

EXHIBIT 7

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/1/2017	Baruch, Douglas W.	Background reading re potential class action.	3.0	\$ 1,285	\$3,855.00
5/2/2017	Baruch, Douglas W.	Address MAVNI matter.	1.5	\$ 1,285	\$1,927.50
5/3/2017	Baruch, Douglas W.	Address MAVNI class action.	3.8	\$ 1,285	\$4,883.00
5/3/2017	Wollenberg, Jennifer	Review MAVNI background and discussions re same.	5.3	\$ 975	\$5,167.50
5/4/2017	Baruch, Douglas W.	Address MAVNI matter.	4.5	\$ 1,285	\$5,782.50
5/4/2017	Gates, Shaun	Review materials from J. Wollenberg regarding MAVNI case.	1.7	\$ 695	\$1,181.50
5/4/2017	Wollenberg, Jennifer	Review MAVNI background and discussions re status and strategy.	6.5	\$ 975	\$6,337.50
5/5/2017	Baruch, Douglas W.	Address MAVNI matter.	3.0	\$ 1,285	\$3,855.00
5/5/2017	Gates, Shaun	MAVNI -- review materials sent by J. Wollenberg; draft outline for screening interview.	4.3	\$ 695	\$2,988.50
5/5/2017	St. Romain, Kate	Review all initial materials from J. Wollenberg regarding potential MAVNI lawsuit; review materials about potential MAVNI plaintiffs; analyze appellate opinion's application to potential MAVNI lawsuit; review examples of complaint for declaratory and injunctive relief based on deprivation of constitution rights, first amended complaint and memorandum in support of motion for preliminary injunction and analyze the application for MAVNI lawsuit.	3.6	\$ 600	\$2,160.00
5/5/2017	Wollenberg, Jennifer	Review MAVNI background and discussions re status and strategy; emails to MAVNIs.	6.1	\$ 975	\$5,947.50
5/6/2017	Wollenberg, Jennifer	Address MAVNI matter, including email from K. Grisez.	0.3	\$ 975	\$292.50
5/7/2017	Wollenberg, Jennifer	Address MAVNI matter, including emails re scheduling interviews of potential plaintiffs.	1.5	\$ 975	\$1,462.50
5/8/2017	Beary, Webster	Team meeting to discuss MAVNI pro bono case with J. Wollenberg; conduct research in support of complaint.	7.7	\$ 780	\$6,006.00
5/8/2017	Gates, Shaun	Address MAVNI. Team meeting; research regarding lawsuits brought under 8 USC 1440.	3.0	\$ 695	\$2,085.00
5/8/2017	St. Romain, Kate	Attend pro bono meeting regarding case background and strategy/tasks; research re potentially relevant decision; watch videos explaining MAVNI program; draft and edit document of biographical information for potential MAVNI plaintiffs and distribute to the team; edit interview screening outline and prepare email to team regarding the same.	5.5	\$ 600	\$3,300.00
5/8/2017	Wollenberg, Jennifer	Address MAVNI matter, including screening questionnaire, scheduling interviews, and team meeting.	8.5	\$ 975	\$8,287.50
5/9/2017	Baruch, Douglas W.	Meetings and calls re MAVNI litigation.	4.0	\$ 1,285	\$5,140.00
5/9/2017	Beary, Webster	Discuss case with J. Wollenberg, D. Baruch, J. LoBue, and K. St. Romain; interview potential clients; conduct legal research on MAVNI program.	8.7	\$ 780	\$6,786.00
5/9/2017	Gates, Shaun	MAVNI. Screening interviews with potential plaintiffs.	4.6	\$ 695	\$3,197.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/9/2017	St. Romain, Kate	Review USCIS Policy Memoranda; updated screening interview outline; attend and record notes for interviews of potential plaintiffs; review 2016 and 2017 DOD MAVNI memos; prepare email to potential plaintiff regarding list of requested documentation regarding MAVNI service and naturalization; telephone call with W. Beary regarding 2016 DOD memorandum.	6.7	\$ 600	\$4,020.00
5/9/2017	Wollenberg, Jennifer	Address MAVNI matter, including screening questionnaire revisions, screening interviews, and a team meeting.	10.5	\$ 975	\$10,237.50
5/10/2017	Beary, Webster	Conduct client interviews; discuss case with J. LoBue, K. St Romain, and J. Wollenberg; conduct research on US immigration law.	7.1	\$ 780	\$5,538.00
5/10/2017	Gates, Shaun	MAVNI. Screening interview with potential plaintiff; draft summary of prior interviews for use in complaint.	3.0	\$ 695	\$2,085.00
5/10/2017	St. Romain, Kate	Review materials from potential plaintiff; prepare complaint paragraphs related to potential plaintiffs; attend telephone conference screening interviews; prepare email to potential plaintiff regarding requested documentation; prepare email to potential plaintiff re follow-up; prepare email to K. Grisez regarding immigration based questions arising from screening interviews; address materials from potential plaintiffs; prepare email to J. Wollenberg and potential plaintiff regarding documentation; address materials regarding the Tiwari lawsuit.	4.9	\$ 600	\$2,940.00
5/10/2017	Wollenberg, Jennifer	Address MAVNI matter, including screening interviews, review of background materials, and emails with potential plaintiffs.	6.9	\$ 975	\$6,727.50
5/11/2017	Baruch, Douglas W.	Address MAVNI litigation.	2.5	\$ 1,285	\$3,212.50
5/11/2017	Beary, Webster	Interview witnesses; discuss case with J. LoBue, J. Wollenberg, and K. St Romain; conduct research on MAVNI program; draft complaint.	9.1	\$ 780	\$7,098.00
5/11/2017	St. Romain, Kate	Review Tiwari v. Mattis's Defendant's Opposition to Plaintiffs' Motion for Preliminary Injunction; screening interview of potential plaintiff; review sample class actions for mandamus and injunctive relief for immigrations cases; email potential plaintiff regarding accessing his MAVNI and naturalization application; review immigration and naturalization documents from potential plaintiff; prepare email to S. Gates and W. Beary regarding interview information and complaint paragraphs for potential plaintiffs.	3.4	\$ 600	\$2,040.00
5/11/2017	Wollenberg, Jennifer	Address MAVNI matter, including team emails, emails with potential plaintiffs, and screening interview.	6.5	\$ 975	\$6,337.50
5/12/2017	Baruch, Douglas W.	Confer with J. Wollenberg and address MAVNI case status with team and common interest counsel.	1.8	\$ 1,285	\$2,313.00
5/12/2017	Beary, Webster	Interview witnesses; discuss case with team members; conduct research re MAVNI; draft complaint.	10.8	\$ 780	\$8,424.00
5/12/2017	Gates, Shaun	MAVNI. Draft interview memos.	2.1	\$ 695	\$1,459.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/12/2017	Raol, Neaha	MAVNI - conference with J. Wollenberg re: background, research assignment; legal research re: organizational standing; review factual background on MAVNI.	3.5	\$ 870	\$3,045.00
5/12/2017	St. Romain, Kate	Prepare biographical information guides for all May 12, 2017 screening interviews; screening interview of potential plaintiffs; attend telephone conference with team and common interest counsel regarding outstanding questions about the MAVNI program and MAVNI treatment; review and distribute the documentation provided by potential plaintiffs; prepare email to W. Beary regarding additional information of potential plaintiff's complaint section; prepare email to potential plaintiff regarding requested documentation.	4.3	\$ 600	\$2,580.00
5/12/2017	Wollenberg, Jennifer	Address MAVNI matter, including various team emails, emails with potential plaintiffs, multiple screening interviews, call with common interest counsel, and team meeting.	11.5	\$ 975	\$11,212.50
5/13/2017	Beary, Webster	Review materials from prior MAVNI court proceeding.	1.1	\$ 780	\$858.00
5/13/2017	St. Romain, Kate	Prepare email to potential plaintiff regarding outstanding paperwork and potential for use of a class action lawsuit; prepare email to potential plaintiffs regarding requested documentation; review outstanding facts necessary for the MAVNI complaint and prepare email to W. Beary confirming and providing additional facts based on reviewed documentation.	1.3	\$ 600	\$780.00
5/13/2017	Wollenberg, Jennifer	Address emails re MAVNI matter.	0.5	\$ 975	\$487.50
5/14/2017	Baruch, Douglas W.	Review and address MAVNI issues.	1.5	\$ 1,285	\$1,927.50
5/15/2017	Baruch, Douglas W.	Address MAVNI litigation.	2.0	\$ 1,285	\$2,570.00
5/15/2017	Beary, Webster	Interview witness; discuss case with J. LoBue, J. Wollenberg, K. St Romain, D. Baruch, and N. Raol; conduct research on MAVNI program; draft complaint.	8.5	\$ 780	\$6,630.00
5/15/2017	Gates, Shaun	MAVNI. Team meeting to discuss status of matter.	0.9	\$ 695	\$625.50
5/15/2017	Raol, Neaha	Conference with potential plaintiff; team meeting; review DC Cir. organizational standing case law; review background material and draft complaint; review sample PI motions, conferences with J. Wollenberg, W. Beary re: same.	4.1	\$ 870	\$3,567.00
5/15/2017	Wollenberg, Jennifer	Address potential lawsuit, potential plaintiffs, and draft complaint.	5.8	\$ 975	\$5,655.00
5/16/2017	Baruch, Douglas W.	Address MAVNI litigation.	3.5	\$ 1,285	\$4,497.50
5/16/2017	Beary, Webster	Discuss case with J. LoBue, J. Wollenberg, K. St Romain, D. Baruch, and N. Raol; conduct research on equal protection issue; draft complaint.	7.0	\$ 780	\$5,460.00
5/16/2017	Raol, Neaha	MAVNI - review DC district court and local rules re: application for PI; case law research re: same.	2.6	\$ 870	\$2,262.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/16/2017	St. Romain, Kate	Call with W. Beary regarding status, additions and deletions to the draft complaint; review email from potential plaintiff and prepare edits to potential plaintiff's complaint narrative; review all documents sent from potential plaintiff; review sample writ of mandamus for immigration civil action; review District Court rules regarding class actions and filing of a complaint; research sample motions to certify a class action; review additional emails and documentation for potential plaintiff; address correspondence with potential plaintiffs; review additional documentation from potential plaintiff.	6.2	\$ 600	\$3,720.00
5/16/2017	Wollenberg, Jennifer	Work on potential MAVNI matter, including discussions with potential plaintiffs, team discussions, and work on draft complaint.	4.9	\$ 975	\$4,777.50
5/17/2017	Baruch, Douglas W.	Address MAVNI litigation.	4.5	\$ 1,285	\$5,782.50
5/17/2017	Beary, Webster	Discuss case with J. LoBue, J. Wollenberg, K. St Romain, and N. Raol; draft complaint.	8.0	\$ 780	\$6,240.00
5/17/2017	Raol, Neaha	MAVNI - case law research and drafting of application for PI.	2.4	\$ 870	\$2,088.00
5/17/2017	St. Romain, Kate	Call with W. Beary regarding status, additions and deletions to the draft MAVNI complaint; review email and documents provided by potential plaintiff; review relief section of MAVNI complaint; review email from B. McNamara and edit the MAVNI complaint accordingly.	1.3	\$ 600	\$780.00
5/17/2017	Wollenberg, Jennifer	Work on MAVNI matter, including causes of action, team discussions, and conversations with potential plaintiffs.	5.2	\$ 975	\$5,070.00
5/18/2017	Beary, Webster	Discuss case with J. LoBue, J. Wollenberg, K. St Romain, and S. Gates; draft complaint.	0.8	\$ 780	\$624.00
5/18/2017	Gates, Shaun	MAVNI. Review enlistment contracts and related materials.	2.5	\$ 695	\$1,737.50
5/18/2017	Raol, Neaha	MAVNI - Review local/court rules re: complaint; review draft complaint and draft/research re: application for PI; conference with J. Wollenberg re: same.	4.7	\$ 870	\$4,089.00
5/18/2017	St. Romain, Kate	Review news story, "Living in limbo: DOD rule change stalls path to citizenship"; analysis of the Federal Rules of Civil Procedure and the Local Federal Rule applicable to the filing of MAVNI complaint; add information from W. Beary regarding one potential plaintiff's complaint section; email W. Beary regarding inclusion of an APA claim in the MAVNI complaint; prepare emails to and respond to emails from S. Gates regarding MAVNI enlistment contract language; edit MAVNI complaint, hold telephone call with J. Wollenberg regarding the same and distribute to the team.	3.9	\$ 600	\$2,340.00
5/18/2017	Wollenberg, Jennifer	Address potential MAVNI suit, including discussions with potential plaintiffs, team discussions, and work on complaint/causes of action.	5.9	\$ 975	\$5,752.50
5/19/2017	Baruch, Douglas W.	MAVNI litigation calls, meetings and complaint.	4.0	\$ 1,285	\$5,140.00
5/19/2017	Beary, Webster	Discuss case with K. St Romain.	0.2	\$ 780	\$156.00
5/19/2017	Gates, Shaun	MAVNI. Team meeting to discuss status of matter; review enlistment contracts; review complaint.	3.8	\$ 695	\$2,641.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/19/2017	Raol, Neaha	MAVNI - team conference; review/revise draft correspondence with clients and redacted versions of complaint; conferences with K. St. Romain re: same; draft application for PI; review material/documents received from clients.	5.5	\$ 870	\$4,785.00
5/19/2017	St. Romain, Kate	Review and chart potential MAVNI plaintiffs responses to correspondence; attend meeting with MAVNI litigation team regarding status of the complaint, additional research and plaintiff follow-up; draft and edit email regarding the draft of MAVNI complaint; prepare follow-up emails to MAVNI plaintiffs; distribute copies of the complaint to B. Juceam, K. Grisez, and common interest counsel; hold telephone calls and draft emails to and respond to emails from N. Raol regarding redacting the MAVNI complaint and tailoring the redactions for each MAVNI plaintiff; email the individualized redacted MAVNI complaints to each MAVNI plaintiff.	5.6	\$ 600	\$3,360.00
5/19/2017	Wollenberg, Jennifer	Work on potential MAVNI matter, including team meeting and work on draft complaint.	3.7	\$ 975	\$3,607.50
5/20/2017	Wollenberg, Jennifer	Review emails regarding matter, including updates re similar MAVNI matter.	1.2	\$ 975	\$1,170.00
5/21/2017	Raol, Neaha	Review responses/correspondence from clients re: draft complaint.	0.2	\$ 870	\$174.00
5/21/2017	St. Romain, Kate	Prepare emails to MAVNI plaintiffs responses to complaint draft; prepare email to team containing a compilation of the MAVNI edits to the factual assertions in the complaint; prepare email to J. Wollenberg regarding preparation of a response to potential plaintiff; review common interest counsel's proposed edits to the complaint.	2.1	\$ 600	\$1,260.00
5/21/2017	Wollenberg, Jennifer	Address emails regarding matter, including from potential plaintiffs and J. LoBue.	1.0	\$ 975	\$975.00
5/22/2017	Baruch, Douglas W.	Edits and revisions to MAVNI complaint and calls and meetings re same.	4.5	\$ 1,285	\$5,782.50
5/22/2017	Beary, Webster	Team meeting to discuss MAVNI complaint with D. Baruch and rest of team; review and edit complaint; research on APA issue.	7.2	\$ 780	\$5,616.00
5/22/2017	Gates, Shaun	Team meeting to discuss status of matter; draft chart of plaintiff information.	1.5	\$ 695	\$1,042.50
5/22/2017	Raol, Neaha	Client calls; team meeting; team call with common interest counsel; confer and follow-up with K. St. Romain and draft client follow up correspondence; review documents from client; review and revise/comment on draft complaint; review Equal Protection and other potential legal arguments.	6.5	\$ 870	\$5,655.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/22/2017	St. Romain, Kate	Telephone conference with potential plaintiff regarding MAVNI complaint information and in-person meeting with team regarding MAVNI responses and tasks moving forward; review diagram of reserve services; review common interest counsel's edits to the complaint and comments on these edits by D. Baruch and J. Wollenberg; attend telephone call with MAVNI team and common interest counsel regarding additional attorney and organization's role in the MAVNI law suit; review research and discussion regarding the Kendell Frederick Citizenship Assistance Act and email to potential plaintiff regarding the same; address responses from MAVNI plaintiffs; prepare multiple updated drafts of MAVNI complaint and email complaint to team and K. Grisez.	4.6	\$ 600	\$2,760.00
5/22/2017	Wollenberg, Jennifer	Address litigation, including comments on draft complaint, emails and calls with team, calls and emails with potential clients/plaintiffs, and call with common interest attorneys.	5.4	\$ 975	\$5,265.00
5/23/2017	Baruch, Douglas W.	Edits and revisions to draft complaint; meetings and calls re same.	4.0	\$ 1,285	\$5,140.00
5/23/2017	Beary, Webster	Review and edit complaint; discuss case with K. St. Romain and J. LoBue.	4.7	\$ 780	\$3,666.00
5/23/2017	LoBue, Joseph J.	Draft, edit complaint in MAVNI case.	3.1	\$ 1,180	\$3,658.00
5/23/2017	Raol, Neaha	Review revisions and comments to draft complaint; conferences with various team members re: same; review and revise pleading; review research, potential APA legal argument; revise draft complaint. Review correspondence from various clients.	4.8	\$ 870	\$4,176.00
5/23/2017	St. Romain, Kate	Hold telephone call with plaintiff regarding questions about the draft complaint; prepare email update to MAVNI litigation team regarding named plaintiffs' authorization to file complaint; prepare email to J. Wollenberg regarding comments to complaint and incorporate J. Wollenberg's comments and distribute updated complaint to MAVNI litigation team; review battalion assignment for plaintiff with W. Beary; incorporate comments and edits to the MAVNI complaint from J. LoBue and D. Baruch, prepare email to W. Beary regarding outstanding research comments, and hold telephone conference with Neaha Raol regarding the same; prepare email to plaintiff regarding edited paragraphs regarding plaintiff circumstance in MAVNI complaint.	3.4	\$ 600	\$2,040.00
5/23/2017	Wollenberg, Jennifer	Address matter, including comments on draft complaint, emails with clients and advisors, and discussions with team.	4.2	\$ 975	\$4,095.00
5/24/2017	Baruch, Douglas W.	Address complaint and research.	2.5	\$ 1,285	\$3,212.50
5/24/2017	Beary, Webster	Review and edit complaint; discuss case with J. Wollenberg, J. LoBue, K. St. Romain, and N. Raol.	5.1	\$ 780	\$3,978.00
5/24/2017	Gates, Shaun	Review complaint.	1.5	\$ 695	\$1,042.50
5/24/2017	LoBue, Joseph J.	Edit complaint in MAVNI case; review materials for MAVNI case.	4.4	\$ 1,180	\$5,192.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/24/2017	Raol, Neaha	Review client documents/call notes; conference with P. Jerjian and E. LoPresti re: background and assignment; research re: jury demand and confer with J. Wollenberg, W/ Beary re: same; review/revise and finalize draft complaint; facilitate filing of complaint; review Tiwari pleadings; conference with J. Wollenberg re: complaint and filing; review draft talking points and email for clients.	9.3	\$ 870	\$8,091.00
5/24/2017	St. Romain, Kate	Hold telephone conference with W. Beary regarding quotation check for MAVNI complaint; prepare email to N. Raol regarding plaintiffs information and communications; prepare email to K. Grisez regarding her comments and edits to the MAVNI complaint and hold conversation with J. Wollenberg regarding the same; review requirements for EAJA funding declarations; fact check and coordinate the fact check of the MAVNI complaint information referencing plaintiffs and discuss the edits with N. Raol; draft email to MAVNI plaintiffs regarding the filing of the complaint; prepare email to W. Beary regarding screening interview notes.	4.1	\$ 600	\$2,460.00
5/24/2017	Wollenberg, Jennifer	Address litigation, including review and filing of complaint, discussions with clients, and preparation of talking points.	11.0	\$ 975	\$10,725.00
5/25/2017	Baruch, Douglas W.	Address complaint and motion.	2.5	\$ 1,285	\$3,212.50
5/25/2017	Beary, Webster	Participate in team meeting with D. Baruch, J. Wollenberg, N. Raol, and K. St. Romain; draft preliminary injunction.	2.5	\$ 780	\$1,950.00
5/25/2017	Gates, Shaun	Team meeting to discuss status of matter; review complaint.	2.0	\$ 695	\$1,390.00
5/25/2017	LoBue, Joseph J.	Meeting with team regarding preliminary injunction motion; review materials relating to preliminary injunction.	1.6	\$ 1,180	\$1,888.00
5/25/2017	Raol, Neaha	Team meeting; correspondence/confer with various team members re: next steps, tracking of potential class members; review update from common interest counsel; review client correspondence; correspondence and follow-up re: complaint/case processing, service; research re: assigned judge; email correspondence/review draft declarations from E. LoPresti and P. Jerjian; confer with E. LoPresti re: research assignment; review draft from and confer with W. Beary re motion for PI outline (re: likelihood of success factor); research and pull Tiwari PI papers.	7.6	\$ 870	\$6,612.00
5/25/2017	St. Romain, Kate	Address interview screening notes; email MAVNI plaintiffs with certified copy of the MAVNI litigation complaint; draft email to common interest counsel regarding the filing of the MAVNI litigation complaint; email R. Juceam certified copy of the MAVNI litigation complaint; draft and send response to plaintiff regarding additional plaintiffs for the MAVNI complaint; organize and collect additional cases similar to the MAVNI complaint; draft and edit email to plaintiff regarding use of additional constitutional claims in complaint and distribute to J. Wollenberg, J. LoBue and D. Baruch for edits; attend team meeting regarding next steps and assignments for the preliminary injunction; draft email to common interest counsel regarding FOIA request and filing of MAVNI complaint.	5.1	\$ 600	\$3,060.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/25/2017	Wollenberg, Jennifer	Address litigation, including circulation of complaint, discussions with clients, team meeting regarding next steps, and other tasks.	6.4	\$ 975	\$6,240.00
5/26/2017	Baruch, Douglas W.	Calls with DOJ attorney, address client inquiries, address PI research.	2.5	\$ 1,285	\$3,212.50
5/26/2017	Beary, Webster	Team meeting to discuss case with J. Wollenberg, N. Raol, K. St Romain, and D. Baruch; perform research in support of preliminary injunction.	3.2	\$ 780	\$2,496.00
5/26/2017	Gates, Shaun	T/C with team regarding preliminary injunction; review documents for filing.	2.8	\$ 695	\$1,946.00
5/26/2017	LoBue, Joseph J.	Review legislative history of 8 U.S.C. section 1440 amendments; conference call with Government regarding case; review, edit outline for preliminary injunction; meeting with team regarding preliminary injunction motion.	2.2	\$ 1,180	\$2,596.00
5/26/2017	Raol, Neaha	Draft PI motion outline; research re: PI standard, factors; conferences with E. LoPresti and P. Jerjian re: research assignment and findings; review case law research findings; revise draft outline; team meeting re: same and status of various tasks.	7.9	\$ 870	\$6,873.00
5/26/2017	St. Romain, Kate	Email plaintiff regarding filing of MAVNI complaint and arguments presented in the complaint; update MAVNI plaintiff files; send follow-up email regarding Senator's response to plaintiff; hold follow-up telephone calls with plaintiffs; research irreparable injury related preliminary injunctions for intangible harms; attend in-person meeting regarding division of the preliminary injunction, research results, and outstanding tasks and research.	4.6	\$ 600	\$2,760.00
5/26/2017	Wollenberg, Jennifer	Address lawsuit, including emails with common interest counsel, discussions with clients, review of PI outline, and discussions with internal team.	7.5	\$ 975	\$7,312.50
5/29/2017	Baruch, Douglas W.	Review status.	0.8	\$ 1,285	\$1,028.00
5/30/2017	Baruch, Douglas W.	Meetings, calls and strategy re complaint.	4.0	\$ 1,285	\$5,140.00
5/30/2017	Beary, Webster	Conduct research on PI motion standard; edit portion of preliminary injunction and send to N. Raol for review.	4.1	\$ 780	\$3,198.00
5/30/2017	Gates, Shaun	Research for preliminary injunction motion; draft preliminary injunction motion.	2.9	\$ 695	\$2,015.50
5/30/2017	LoBue, Joseph J.	Review materials for preliminary injunction motion.	1.6	\$ 1,180	\$1,888.00
5/30/2017	Raol, Neaha	Review notices of appearance and confer with K. St. Romain and J. Wollenberg re: same; review various client updates/correspondence; review research from E. LoPresti and circulate to team/follow-up; legal research re: various aspects of PI motion; draft PI motion and confer with team/follow-up re various legal arguments; review case law circulated by team.	5.7	\$ 870	\$4,959.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/30/2017	St. Romain, Kate	Review order and opinion regarding the motion to dismiss and motion for class certification; review materials from plaintiff regarding his oath ceremony and prepare responsive email to plaintiff regarding the same; review local rules for a preliminary injunction in DC District Court; review prior preliminary injunction decisions by Judge Huvelle; review the docket in Cody case; meeting with S. Johnson to discuss background for MAVNI case and specific research regarding irreparable harm; review case regarding right to travel and prepare email response to S. Johnson regarding MAVNI complaint's focus; hold telephone call with N. Raol regarding structure and content of irreparable harm section; research travel ban preliminary injunction briefs and prepare email to N. Raol, S. Gates and W. Beary regarding travel ban related law suits and documents.	5.2	\$ 600	\$3,120.00
5/30/2017	Wollenberg, Jennifer	Address updates from common interest counsel and others; review materials related to draft PI motion.	3.4	\$ 975	\$3,315.00
5/31/2017	Baruch, Douglas W.	Address complaint issues, calls, and strategy.	3.5	\$ 1,285	\$4,497.50
5/31/2017	Beary, Webster	Conduct research on PI motion; Discuss with N. Raol.	0.6	\$ 780	\$468.00
5/31/2017	Gates, Shaun	Draft preliminary injunction section.	4.2	\$ 695	\$2,919.00
5/31/2017	LoBue, Joseph J.	Review materials for preliminary injunction motion.	2.4	\$ 1,180	\$2,832.00
5/31/2017	Raol, Neaha	Legal research and drafting re: PI motion; confer with various team members re: PI motion sections, follow-up and comments, including J. Wollenberg, W. Beary, K. St. Romain, S. Gates; review legal research re: expedited discovery and correspondence with P. Jerjian re: same.	6.5	\$ 870	\$5,655.00
5/31/2017	St. Romain, Kate	Review Law360 article; hold telephone call with N. Raol regarding outstanding research on the irreparable harm section of the preliminary injunction; coordinate additional research with E. LoPresti, research and write irreparable harm section of the preliminary injunction section, focusing on diminished ability to make a livelihood and travel, and prepare emails to E. LoPresti and hold telephone calls regarding the same; review email from plaintiff regarding naturalization oath and distribute to team.	2.7	\$ 600	\$1,620.00
5/31/2017	Wollenberg, Jennifer	Address matter, including draft PI motion, team discussions, and client discussions.	5.8	\$ 975	\$5,655.00
6/1/2017	Baruch, Douglas W.	Address PI and status.	1.2	\$ 1,285	\$1,542.00
6/1/2017	Beary, Webster	Edit PI motion; participate in team meeting and teleconference with DOJ attorneys.	3.8	\$ 780	\$2,964.00
6/1/2017	Gates, Shaun	Draft preliminary injunction sections.	2.3	\$ 695	\$1,598.50
6/1/2017	LoBue, Joseph J.	Prepare for call with Government attorneys; call with Government attorneys; calls with clients.	1.6	\$ 1,180	\$1,888.00
6/1/2017	Raol, Neaha	Conference with P. Jerjian re: early discovery and draft memo/research; review memo; call with DOJ re: status and response to allegations; team conference re: next steps; revise/draft PI motion; various conferences with W. Beary, K. St. Romain, S. Gates re: same.	6.8	\$ 870	\$5,916.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/1/2017	St. Romain, Kate	Attend call with attorneys from DOJ to discuss DOJ obtained information and meet-and-confer; attend team meeting to discuss outstanding tasks and forward movement for preliminary injunction; prepare emails to W. Beary and E. LoPresti regarding irreparable harm research and drafting; draft and edit irreparable injury section of preliminary injunction and email N. Raol regarding the same; review email by plaintiff and distribute to team; review and incorporate research regarding irreparable harm by W. Beary and E. LoPresti.	4.4	\$ 600	\$2,640.00
6/1/2017	Wollenberg, Jennifer	Discussions with clients regarding inquiries, status, and other issues; prepare for and attend call with DOJ; address PI motion preparation/team questions.	4.7	\$ 975	\$4,582.50
6/2/2017	Baruch, Douglas W.	Address PI status.	1.5	\$ 1,285	\$1,927.50
6/2/2017	Beary, Webster	Edit PI motion; discuss PI motion with N. Raol.	1.0	\$ 780	\$780.00
6/2/2017	Gates, Shaun	Revise preliminary injunction sections.	0.5	\$ 695	\$347.50
6/2/2017	LoBue, Joseph J.	Review materials for preliminary injunction motion.	1.4	\$ 1,180	\$1,652.00
6/2/2017	Raol, Neaha	Draft/review/revise PI motion; conferences with W. Beary, K. St. Romain, J. Wollenberg re: same; review draft declarations and confer with K. St. Romain re: same; review correspondence/updates from client, common interest counsel; legal research re: articles, statutes mentioning MAVNI; review local rules.	6.7	\$ 870	\$5,829.00
6/2/2017	St. Romain, Kate	Review sample irreparable harm citations and cases; edit irreparable harm section of the Preliminary Injunction brief; meet with summer associates S. Johnson, E. LoPresti and P. Jerjian regarding drafting of declarations for preliminary injunction; edit declaration for MAVNI plaintiff and meet with N. Raol to discuss the same; provide S. Johnson with background material regarding complaint and declarations; review emails and information regarding oath ceremony for plaintiff and respond to plaintiff's email.	3.6	\$ 600	\$2,160.00
6/2/2017	Wollenberg, Jennifer	Discussions with clients; address PI motion preparation/team questions.	3.9	\$ 975	\$3,802.50
6/3/2017	St. Romain, Kate	Edit the Declaration of plaintiff and email N. Raol regarding the same.	1.2	\$ 600	\$720.00
6/3/2017	Wollenberg, Jennifer	Emails with common interest counsel re situation updates.	0.3	\$ 975	\$292.50
6/4/2017	Wollenberg, Jennifer	Work on preliminary injunction arguments and brief.	9.9	\$ 975	\$9,652.50
6/5/2017	Raol, Neaha	Confer with K. St. Romain re: PI motion, related papers, and next steps; factual research and agency guidance, statements, material; review J. Wollenberg comments to PI motion; revise draft PI motion; confer with J. Wollenberg re: same.	5.1	\$ 870	\$4,437.00
6/5/2017	St. Romain, Kate	Meet with N. Raol regarding status update for preliminary injunction; edit declaration for plaintiff; research time line for naturalization applications expectations; coordinate with summer associates the drafting of MAVNI plaintiff declarations; research/edit irreparable harm section of preliminary injunction; prepare email to N. Raol regarding irreparable injury case comparison; prepare emails to and respond to emails from E. LoPresti regarding irreparable injury research; prepare email to P. Jerjian regarding effect of visa issue for plaintiff.	6.4	\$ 600	\$3,840.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/5/2017	Wollenberg, Jennifer	Review materials/information relating to MAVNIs and discuss draft preliminary injunction motion with team members.	2.3	\$ 975	\$2,242.50
6/6/2017	Raol, Neaha	Review/revise draft declaration; conference with K. St. Romain re: draft declarations - substance and logistics; review and comments on irreparable harm section, review cases cited; confer with K. St. Romain re: same; draft/revise PI motion; review recent developments and correspondence from common interest counsel re: same.	5.8	\$ 870	\$5,046.00
6/6/2017	St. Romain, Kate	Edit MAVNI declarations for plaintiffs, and prepare email to N. Raol and team regarding the same; edit irreparable harm section of preliminary injunction and email N. Raol and J. Wollenberg regrading the same; review research by E. LoPresti regarding irreparable harm and prepare and respond to emails regarding the same; hold call with and prepare email to J. Wollenberg regarding declaration interviews with plaintiffs; email MAVNI plaintiffs regarding declaration interviews; draft plaintiff fact section for preliminary injunction.	5.6	\$ 600	\$3,360.00
6/6/2017	Wollenberg, Jennifer	Review MAVNI case information; work on aspects of PI brief; discussions with common interest counsel and other updates.	5.1	\$ 975	\$4,972.50
6/7/2017	Baruch, Douglas W.	Address status and PI motion.	1.2	\$ 1,285	\$1,542.00
6/7/2017	Raol, Neaha	Draft/revise PI brief; correspondence; various conferences/follow-up with K. St. Romain re: same; identify potential discovery-related requests for DOJ.	9.1	\$ 870	\$7,917.00
6/7/2017	St. Romain, Kate	Draft plaintiff fact section, edit preliminary injunction and email N. Raol regarding the same; prepare emails to plaintiffs regarding interview meeting; meeting with P. Jerjian regarding plaintiff declaration and talking points for interview call; draft fact section for plaintiff and prepare emails to N. Raol regarding the same; hold call with E. LoPresti regarding plaintiff declaration and talking points; coordinate plaintiff's declaration drafting.	5.0	\$ 600	\$3,000.00
6/7/2017	Wollenberg, Jennifer	Address matter status and strategy, including discussions with common interest counsel, clients, team, and government attorneys.	1.9	\$ 975	\$1,852.50
6/8/2017	Baruch, Douglas W.	Calls with DOJ and common interest counsel and address PI strategy.	1.5	\$ 1,285	\$1,927.50
6/8/2017	Gates, Shaun	Teleconference with DOJ regarding complaint; teleconference with common interest counsel regarding status of litigation; draft consent judgment.	3.8	\$ 695	\$2,641.00
6/8/2017	LoBue, Joseph J.	Conference calls with Government and co-counsel regarding case status.	1.7	\$ 1,180	\$2,006.00
6/8/2017	St. Romain, Kate	Prepare email responses to MAVNI Plaintiffs regarding declaration interviews; edit MAVNI plaintiff declarations and interview talking points/ questions and prepare emails to S. Johnson, E. LoPresti and P. Jerjian regarding the same; review summer associate prepared packets for MAVNI declaration interviews; hold meeting with S. Johnson, E. LoPresti and P. Jerjian regarding structure of MAVNI declaration interviews; attend telephone conference with DOJ and team to discuss investigation and lawsuit; attend telephone conference with common interest counsel and team to discuss plaintiff and DOJ updates; attend team meeting to discuss moving forward.	6.8	\$ 600	\$4,080.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
6/8/2017	Wollenberg, Jennifer	Address draft PI motion; conversations with clients; prep for and attend call with DOJ attorneys; team discussions regarding strategy; call with common interest counsel.	6.9	\$ 975	\$6,727.50
6/9/2017	Baruch, Douglas W.	Discuss status with J. Wollenberg.	0.4	\$ 1,285	\$514.00
6/9/2017	Gates, Shaun	Draft consent judgment order.	2.3	\$ 695	\$1,598.50
6/9/2017	LoBue, Joseph J.	Interviews with plaintiffs for preliminary injunction declarations.	2.1	\$ 1,180	\$2,478.00
6/9/2017	St. Romain, Kate	Prepare email to plaintiff regarding discussion topics for interview call; review and edit the declarations and interview questions for plaintiffs, and prepare emails to S. Johnson and P. Jerjian regarding the same; hold interview calls with all MAVNI plaintiffs, J. Wollenberg and team members work on the plaintiff's declaration, and prepare notes for portions of calls where not conducting the interview; prepare emails regarding follow-up from MAVNI plaintiff interviews to E. LoPresti and hold meeting regarding the same.	7.4	\$ 600	\$4,440.00
6/9/2017	Wollenberg, Jennifer	Calls and emails with clients and discussions with internal team and common interest counsel re matter, including strategy.	10.9	\$ 975	\$10,627.50
6/11/2017	Gates, Shaun	Revise consent judgment order.	1.0	\$ 695	\$695.00
6/11/2017	Raol, Neaha	Review various responses/additional information from clients, news articles.	1.0	\$ 870	\$870.00
6/11/2017	St. Romain, Kate	Edit consent judgment; listen to AILA call discussing MAVNI program immigration effects.	0.9	\$ 600	\$540.00
6/11/2017	Wollenberg, Jennifer	Emails with clients; emails with common interest counsel; review additional information; prepare draft PI brief; discussions with internal team; comments to draft consent judgment document.	4.2	\$ 975	\$4,095.00
6/12/2017	Baruch, Douglas W.	Call with DOJ, team meeting, and address PI strategy.	1.5	\$ 1,285	\$1,927.50
6/12/2017	Beary, Webster	Phone conference with DOJ attorney regarding MAVNI hold; compile evidence of a DoD MAVNI hold and send to J. Wollenberg.	6.6	\$ 780	\$5,148.00
6/12/2017	Gates, Shaun	Call with DoJ regarding complaint; meeting with team to discuss status of matter.	1.7	\$ 695	\$1,181.50
6/12/2017	LoBue, Joseph J.	Conference call with Government; review draft consent judgment; review materials for preliminary injunction motion.	2.4	\$ 1,180	\$2,832.00
6/12/2017	Raol, Neaha	Conference with DOJ, FF team; FF team follow-up meeting; review individual plaintiff facts/notes/documents and revise draft PI motion re: same; conferences with J. Wollenberg, K. St. Romain re: same; conference with J. Wollenberg, W. Beary re: PI exhibit/summary chart; review information re: NSC/lockbox; review material from clients; review local rules re: declarations.	6.7	\$ 870	\$5,829.00
6/12/2017	St. Romain, Kate	Review additional information from plaintiffs; edit plaintiff declarations and hold telephone calls with E. LoPresti and P. Jerjian regarding the same; prepare email to N. Raol regarding plaintiff irreparable injury; research and prepare emails to the team regarding the purpose and uses for a USCIS lockbox and hold telephone call with E. LoPresti regarding the same; draft response to plaintiff regarding telephone call with DOJ attorneys; attend telephone conference with DOJ and team meeting.	3.5	\$ 600	\$2,100.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/12/2017	Wollenberg, Jennifer	Prepare for and attend call with DOJ; work on draft PI motion; emails with clients; internal team meetings re strategy and status; emails with common interest counsel.	10.2	\$ 975	\$9,945.00
6/13/2017	Baruch, Douglas W.	Address PI motion and respond to client inquiries.	1.8	\$ 1,285	\$2,313.00
6/13/2017	Gates, Shaun	Revise consent judgment order.	0.2	\$ 695	\$139.00
6/13/2017	Raol, Neaha	Review client correspondence/information; review individual plaintiff facts/notes/documents and revise draft PI motion re: same; confer with J. Wollenberg re: same; review draft declaration and notes to file for meet and confer with DOJ.	5.8	\$ 870	\$5,046.00
6/13/2017	St. Romain, Kate	Draft emails to MAVNI plaintiffs regarding the status of the case and email J. Wollenberg regarding the same; hold telephone calls with P. Jerjian and E. LoPresti regarding MAVNI plaintiff declarations' content and edits; hold telephone call with plaintiff regarding status of MAVNI preliminary injunction; edit MAVNI plaintiff declarations and prepare emails to P. Jerjian and E. LoPresti regarding the same; review emails from and about plaintiff regarding the de-scheduling of her oath ceremony.	4.1	\$ 600	\$2,460.00
6/13/2017	Wollenberg, Jennifer	Address plaintiff's situation, including call with client and email to DOJ; discussions with internal team members; address updates and status; work on PI brief.	4.5	\$ 975	\$4,387.50
6/14/2017	Baruch, Douglas W.	Multiple calls and meetings to address litigation strategy and PI motion.	3.5	\$ 1,285	\$4,497.50
6/14/2017	Beary, Webster	Review email correspondence; discuss case with J. Wollenberg.	0.4	\$ 780	\$312.00
6/14/2017	Gates, Shaun	Review correspondence regarding naturalization ceremony delays.	0.2	\$ 695	\$139.00
6/14/2017	LoBue, Joseph J.	Conference call with common interest counsel; review materials in support of preliminary injunction motion; team meeting regarding preliminary injunction motion.	3.5	\$ 1,180	\$4,130.00
6/14/2017	Raol, Neaha	Research federal case law, secondary sources re: separation and discharge of MAVNIs; confer with J. Wollenberg re: same.	3.0	\$ 870	\$2,610.00
6/14/2017	St. Romain, Kate	Edit declarations for plaintiffs and email P. Jerjian, E. LoPresti, and N. Raol regarding the same; research class action filing deadlines and email J. Wollenberg regarding the same.	1.5	\$ 600	\$900.00
6/14/2017	Wollenberg, Jennifer	Internal discussions re matter; work on draft PI motion; discussions with common interest counsel.	5.8	\$ 975	\$5,655.00
6/15/2017	Baruch, Douglas W.	Address strategy and calls and meetings re same.	2.0	\$ 1,285	\$2,570.00
6/15/2017	Gates, Shaun	Review correspondence from common interest counsel.	0.3	\$ 695	\$208.50
6/15/2017	LoBue, Joseph J.	Review DoD memo on MAVNI dispositions; meeting with J. Wollenberg regarding memo; conference call with common interest counsel regarding DoD memo.	1.9	\$ 1,180	\$2,242.00
6/15/2017	Raol, Neaha	Conference with R. Williams re: research on PI standard; review individual plaintiffs' documents, notes, correspondence and draft/revise PI motion; confer with J. Wollenberg re: DoD memo.	7.1	\$ 870	\$6,177.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
6/15/2017	Wollenberg, Jennifer	Discussions with common interest counsel; emails with clients; address status and strategy; emails with DOJ attorneys.	4.5	\$ 975	\$4,387.50
6/16/2017	Baruch, Douglas W.	Meetings and calls, including with DOJ attorneys, re status and strategy.	2.5	\$ 1,285	\$3,212.50
6/16/2017	Beary, Webster	Participate in teleconference with DOJ attorneys on case resolution; discuss PI research task with J. Wollenberg; update chart on evidence of a DoD hold.	2.5	\$ 780	\$1,950.00
6/16/2017	Gates, Shaun	Call with DOJ; review correspondence from common interest counsel.	2.5	\$ 695	\$1,737.50
6/16/2017	LoBue, Joseph J.	Conference call with Government; meeting with team regarding consent judgment issues.	1.9	\$ 1,180	\$2,242.00
6/16/2017	Raol, Neaha	Conference with DOJ, FF team; review additional factual information and internal correspondence re: expedited processing language; review case law.	5.1	\$ 870	\$4,437.00
6/16/2017	St. Romain, Kate	Read email articles from common interest counsel regarding MAVNI updates and NJ.com editorial, and email team regarding the same; hold meeting with J. Wollenberg regarding case strategy updates; attend conference call with DOJ regarding case status and factual updates; review law regarding class certification deadlines; review plaintiff's N-426; prepare email to J. Wollenberg regarding plaintiff's N-426 and email update to MAVNI plaintiffs regarding DOJ conference call.	4.3	\$ 600	\$2,580.00
6/16/2017	Wollenberg, Jennifer	Emails with common interest counsel and clients regarding status; call with DOJ and team discussion; address arguments/strategy.	6.8	\$ 975	\$6,630.00
6/17/2017	Baruch, Douglas W.	Address term sheet.	1.5	\$ 1,285	\$1,927.50
6/17/2017	Wollenberg, Jennifer	Emails with clients and internal team members regarding updates.	0.4	\$ 975	\$390.00
6/18/2017	Wollenberg, Jennifer	Address emails from clients and common interest counsel regarding updates; comments to draft term sheet and internal emails re same.	1.5	\$ 975	\$1,462.50
6/19/2017	Baruch, Douglas W.	Address term sheet and fact updates.	2.0	\$ 1,285	\$2,570.00
6/19/2017	Beary, Webster	Discuss preliminary injunction research assignment with B. Jensen.	0.5	\$ 780	\$390.00
6/19/2017	Gates, Shaun	Correspondence with K. St. Romain regarding response to potential plaintiffs.	0.5	\$ 695	\$347.50
6/19/2017	LoBue, Joseph J.	Review term sheet for consent judgment; meeting with common interest counsel regarding case strategy; meeting with D. Baruch and J. Wollenberg regarding consent judgment terms.	2.8	\$ 1,180	\$3,304.00
6/19/2017	Raol, Neaha	Review documents from clients/client call notes and draft/revise declarations; review draft consent judgment and send comments to J. Wollenberg; review correspondence from common interest counsel, client calls; review correspondence with DOJ.	6.5	\$ 870	\$5,655.00
6/19/2017	St. Romain, Kate	Review emails from MAVNI plaintiffs and prepare email responses; hold telephone call with plaintiff and prepare email to team regarding discussion; review Nio v. DHS term sheet; review evidence of USCIS hold and prepare email to W. Beary regarding the same; prepare email to J. Wollenberg regarding DOJ calls; edit MAVNI declarations for plaintiffs and email N. Raol regarding the same; review contacts from MAVNIs interested in joining the class and email S. Gates regarding the same.	3.9	\$ 600	\$2,340.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/19/2017	Wollenberg, Jennifer	Draft and send terms to DOJ attorneys; discuss DOJ response with Fried Frank attorneys; meet with common interest counsel attorneys regarding related suit; preparation for PI motion; emails from potential clients and common interest counsel.	4.3	\$ 975	\$4,192.50
6/20/2017	Baruch, Douglas W.	Address PI motion and strategy.	2.5	\$ 1,285	\$3,212.50
6/20/2017	Beary, Webster	Meet with J. Wollenberg, J. LoBue, and D. Baruch to discuss exhibit lists; edit PI motion and discuss edits with J. Wollenberg; discuss PI motion research task with B. Jensen.	7.6	\$ 780	\$5,928.00
6/20/2017	LoBue, Joseph J.	Meeting with team regarding preliminary injunction papers; review materials in support of preliminary injunction motion.	1.8	\$ 1,180	\$2,124.00
6/20/2017	Raol, Neaha	Team meeting; review client documents/files; draft/revise declarations for PI motion; confer with K. St. Romain, J. Wollenberg re: same; correspondence with J. Wollenberg, W. Beary re: PI standard/DDC case law research; confer with library re: common interest counsel book; client correspondence.	6.3	\$ 870	\$5,481.00
6/20/2017	St. Romain, Kate	Edit list of MAVNIs interested in involvement with the lawsuit and prepare emails to the same group; edit declarations for plaintiffs, and prepare emails to N. Raol regarding the same; prepare emails to and respond to emails from MAVNI plaintiffs; review administration quotes and position regarding MAVNI plaintiffs and prepare email to the team regarding the same; draft declaration for J. Wollenberg.	2.7	\$ 600	\$1,620.00
6/20/2017	Wollenberg, Jennifer	Address draft PI motion and accompanying documents, emails with Government attorneys; conversations with clients; team meeting.	6.8	\$ 975	\$6,630.00
6/21/2017	Baruch, Douglas W.	Discuss status with J. Wollenberg; edits to PI declarations; research.	2.0	\$ 1,285	\$2,570.00
6/21/2017	Beary, Webster	Edit PI motion and send proposed edits to J. Wollenberg; edit exhibit list and send updated list to J. Wollenberg; review research on PI motion and discuss with J. Wollenberg.	4.1	\$ 780	\$3,198.00
6/21/2017	LoBue, Joseph J.	Review, edit declarations in support of preliminary injunction motion; meeting with J. Wollenberg regarding PI motion and N-426 issues.	1.2	\$ 1,180	\$1,416.00
6/21/2017	Raol, Neaha	Follow-up with J. Wollenberg re: facts for PI motion/brief; review information from review of clients' N-426s; review/revise and circulate draft declaration to team for review/comments; review comments from D. Baruch and J. LoBue.	1.8	\$ 870	\$1,566.00
6/21/2017	St. Romain, Kate	Complete review of plaintiffs' Form N-426s; hold telephone call with N. Raol regarding MAVNI plaintiff declaration edits; supplement class member/potential plaintiff chart and prepare emails to potential class members; incorporate comments from J. LoBue into plaintiff declaration and prepare email to team regarding declaration and Form N-426s; research requesting oral hearing on a preliminary injunction motion and email team regarding the same.	2.8	\$ 600	\$1,680.00
6/21/2017	Wollenberg, Jennifer	Address draft PI motion; discussions with team; discussions with client.	7.2	\$ 975	\$7,020.00
6/22/2017	Baruch, Douglas W.	Edits and revisions to PI Motion.	2.5	\$ 1,285	\$3,212.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/22/2017	Beary, Webster	Compile exhibits for preliminary injunction; review B. Jensen's research on the PI motion; discuss PI motion with J. Wollenberg, N. Raol, and K. St Romain.	3.9	\$ 780	\$3,042.00
6/22/2017	LoBue, Joseph J.	Review materials for PI motion.	0.6	\$ 1,180	\$708.00
6/22/2017	Raol, Neaha	Review rules/procedures re: nature of suit designation change; review/revise draft motion and proposed order, cover email for DOJ; conferences with J. Wollenberg, K. St. Romain re: same; review client files/notes and draft declarations; review exhibit chart re: factual supporting documents/statements by USCIS/DOD etc; review draft introduction for PI motion; review correspondence/material from common interest counsel; conferences with team re: MAVNI websites.	7.1	\$ 870	\$6,177.00
6/22/2017	St. Romain, Kate	Hold telephone call with N. Raol regarding MAVNI declarations; review news articles related to the Department of Defense's position on the naturalization of MAVNIs; research plaintiff's I-20 submission and revise draft of plaintiff's declaration, and prepare emails to N. Raol regarding the same; edit chart of hold evidence and prepare an email to W. Beary regarding the same; draft motion for leave to change nature of suit, proposed order, and accompanying email to DOJ regarding the same; revise declarations for plaintiffs.	5.0	\$ 600	\$3,000.00
6/22/2017	Wollenberg, Jennifer	Address draft PI motion; discussions with team and others; discussions with clients.	12.4	\$ 975	\$12,090.00
6/23/2017	Baruch, Douglas W.	Edits and revisions to filing, PI motion, and declarations.	5.0	\$ 1,285	\$6,425.00
6/23/2017	Beary, Webster	Discuss redaction plan with B. Jensen; review redactions; prepare exhibit binder for J. LoBue.	1.4	\$ 780	\$1,092.00
6/23/2017	LoBue, Joseph J.	Review exhibits and declarations in support of preliminary injunction motion.	2.3	\$ 1,180	\$2,714.00
6/23/2017	Raol, Neaha	Research re: electronic/restricted access - rules, case law, secondary sources; confer with D. Baruch, K. St. Romain, MAO re: same; review/revise draft motion; confer with J. Wollenberg re: status; review client files/notes and revise/draft declarations; review common interest counsel book/chapter re: discharge, honorable service; review correspondence with DOJ; review draft email/update for clients; review correspondence from common interest counsel.	6.5	\$ 870	\$5,655.00
6/23/2017	St. Romain, Kate	Research who has access to MAVNI docket under the current nature of suit designation and prepare emails to the team regarding the same; edit declarations for plaintiffs and prepare emails to N. Raol regarding the same; hold telephone calls with N. Raol regarding outstanding declaration issues; edit 5.2(c) motion and proposed order and hold telephone calls and in person meetings with J. DeSantis, D. Baruch, J. LoBue, and N. Raol regarding the same; prepare a redline for the declarations of plaintiff; coordinate with B. Jensen re MAVNI PI exhibits; prepare emails to MAVNI plaintiff regarding the filing of the 5.2(c) motion and responses to follow-up questions about the 5.2(c) motion.	7.9	\$ 600	\$4,740.00
6/23/2017	Wollenberg, Jennifer	Address draft PI motion; discussions with team; discussions with clients.	7.2	\$ 975	\$7,020.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/24/2017	Raol, Neaha	Draft client declarations and review underlying documents and correspondence with clients.	4.9	\$ 870	\$4,263.00
6/24/2017	St. Romain, Kate	Draft email to MAVNI plaintiff emails regarding status update, potential class members and preliminary injunction time line; edit declarations for plaintiffs and email N. Raol regarding the same; prepare exhibits to send to MAVNI plaintiffs with draft declarations; prepare email to MAVNI plaintiffs to accompany draft declarations; review comments on draft motion; email draft declarations to plaintiffs.	2.7	\$ 600	\$1,620.00
6/24/2017	Wollenberg, Jennifer	Email to DOJ; emails to clients; comment on draft procedural motion; draft PI motion.	4.1	\$ 975	\$3,997.50
6/25/2017	Raol, Neaha	Draft client declarations and review underlying documents and correspondence with clients.	6.2	\$ 870	\$5,394.00
6/25/2017	St. Romain, Kate	Edit declarations for plaintiffs and email N. Raol regarding the same; email draft declarations of plaintiffs to N. Raol, J. LoBue, J. Wollenberg and D. Baruch; review edits to draft declaration by plaintiff; review emails from plaintiff and prepare response; research differences between DACA and DA; email MAVNI plaintiffs regarding responses with additional information, next steps for declarations and edits to draft declarations.	2.5	\$ 600	\$1,500.00
6/25/2017	Wollenberg, Jennifer	Address client emails; draft PI motion.	3.9	\$ 975	\$3,802.50
6/26/2017	Baruch, Douglas W.	Address Rule 5.2 order; PI motion, and DOJ call.	2.5	\$ 1,285	\$3,212.50
6/26/2017	Beary, Webster	Teleconference with DOJ attorneys; plan follow on tasks with J. Wollenberg, K. St Romain, and N. Raol.	1.5	\$ 780	\$1,170.00
6/26/2017	Gates, Shaun	Revise preliminary injunction draft and exhibits; call with DoJ.	4.2	\$ 695	\$2,919.00
6/26/2017	Raol, Neaha	Confer with DOJ; team conference; review/draft declarations; revise/finalize/file motion re: remote access; various conferences with team members, including J. Wollenberg, S. Gates, K. St. Romain; review summary chart/exhibits and confer with team re: same.	6.4	\$ 870	\$5,568.00
6/26/2017	St. Romain, Kate	Edit Rule 5.2(c) motion and proposed order and email to the team; prepare emails to MAVNI soldiers interested in joining MAVNI litigation; prepare email to plaintiff regarding FOIA request and discovery and email J. Wollenberg regarding the same; read and distribute recent articles regarding MAVNI soldiers; meet with B. Jensen and W. Beary regarding the preparation of exhibits for PI motion; prepare email to plaintiff regarding schedule for declaration review and PI; edit declarations for plaintiffs; coordinate additional edits of MAVNI declarations with E. LoPresti; attend telephone conference with team and DOJ attorneys; hold follow-up telephone conferences with J. Wollenberg and plaintiffs.	9.9	\$ 600	\$5,940.00
6/26/2017	Wollenberg, Jennifer	Finalize procedural motion; draft PI motion and exhibits, etc.; discussions with client, common interest counsel, and internal team.	11.5	\$ 975	\$11,212.50
6/27/2017	Baruch, Douglas W.	Edits and revisions to PI motion and confer with J. Wollenberg re status.	4.0	\$ 1,285	\$5,140.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/27/2017	Beary, Webster	Review PI motion; discuss case with J. Wollenberg; create exhibit list.	6.1	\$ 780	\$4,758.00
6/27/2017	Gates, Shaun	Revise preliminary injunction motion, declarations, and exhibits.	7.5	\$ 695	\$5,212.50
6/27/2017	McNamara, Brendan	Analyze local rules and Federal Rules of Civil Procedure re opposition to motion for preliminary injunction; draft email with analysis to W. Beary.	1.5	\$ 295	\$442.50
6/27/2017	Raol, Neaha	Draft/revise declarations and send to clients for review; review/discuss exhibits and redactions with various team members; pull/review case law cited in PI brief; review correspondence with clients; confer with clients for additional information re: declarations.	12.6	\$ 870	\$10,962.00
6/27/2017	St. Romain, Kate	Hold telephone conferences with J. Wollenberg and plaintiffs; read and distribute articles regarding MAVNI program; prepare emails to MAVNI plaintiffs regarding outstanding questions for the preliminary injunction declaration and draft declarations for review; prepare email to W. Beary regarding updates on declarations; edit plaintiff declarations; hold telephone conference with plaintiff and N. Raol, and plaintiff and J. Wollenberg regarding declaration information; prepare team update regarding status of all plaintiff declarations; hold telephone calls with team members regarding the status, progress and edits to the declarations.	10.0	\$ 600	\$6,000.00
6/27/2017	Wollenberg, Jennifer	Discussions with clients, common interest counsel, and internal team; draft PI motion and exhibits, etc.	15.9	\$ 975	\$15,502.50
6/28/2017	Baruch, Douglas W.	Address PI motion and declarations.	1.5	\$ 1,285	\$1,927.50
6/28/2017	Beary, Webster	Discuss PI motion with J. Wollenberg, N. Raol, K. St Romain, and S. Gates; perform final edits on PI motion.	6.7	\$ 780	\$5,226.00
6/28/2017	Hinnant, H. Coleman	Cite check case law and statutes in Nio motion for preliminary injunction (N. Raol).	5.0	\$ 255	\$1,275.00
6/28/2017	LoBue, Joseph J.	Review, edit preliminary injunction motion.	1.8	\$ 1,180	\$2,124.00
6/28/2017	Raol, Neaha	Draft J. Wollenberg declaration; revise client declarations, incorporate J. Wollenberg comments and send to client; review exhibits and redactions; various conferences with team re: PI motion and filing; review draft motion; review/ incorporate client comments re: declarations and finalize for signing; follow-up correspondence with client re: same; review and final edits to PI brief and related papers.	14.4	\$ 870	\$12,528.00
6/28/2017	St. Romain, Kate	Prepare emails to MAVNI plaintiffs regarding outstanding questions for the preliminary injunction declaration, draft declarations for review, preliminary injunction brief and final versions of declarations for signature; edit plaintiff declarations and preliminary injunction brief; prepare emails to the team regarding Plaintiff declarations and the preliminary injunction brief; read and distribute articles regarding MAVNI program; draft and edit motion and proposed order for preliminary injunction; prepare email to J. Wollenberg regarding CI Risk assessment time line; prepare PDF exhibits for Plaintiff declarations; coordinate filing of preliminary injunction with J. DeSantis.	12.3	\$ 600	\$7,380.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/28/2017	Wollenberg, Jennifer	Discussions with clients, common interest counsel, and internal team; finalize PI motion filing.	16.2	\$ 975	\$15,795.00
6/29/2017	Baruch, Douglas W.	Address PI motion and court call.	1.5	\$ 1,285	\$1,927.50
6/29/2017	Gates, Shaun	Correspondence with N. Raol and K. St. Romain regarding post-preliminary injunction follow up.	0.4	\$ 695	\$278.00
6/29/2017	Raol, Neaha	Address filed papers and draft emails for client, other interested parties; correspondence re: courtesy copy/follow-up items re: filing; confer with MAO and team re: same; review recent MAVNI news/articles; review correspondence from clerk; review correspondence from DOJ and draft response; revise response per J. Wollenberg comments.	5.5	\$ 870	\$4,785.00
6/29/2017	St. Romain, Kate	Attend telephone conference with J. Wollenberg and plaintiffs; address courtesy copies; review, respond to, and chart emails from potential class members; draft talking points for telephone conference with DOJ and Court and email to J. Wollenberg and N. Raol; prepare emails to Plaintiffs regarding preliminary injunction filing and access to exhibits; coordinate phone call with plaintiff; attend telephone conference with J. Wollenberg and legal team from common interest counsel.	6.5	\$ 600	\$3,900.00
6/29/2017	Wollenberg, Jennifer	Address follow-up from PI filing; discussions with clients; discussions with common interest counsel and internal team; call with common interest counsel and others.	7.9	\$ 975	\$7,702.50
6/30/2017	Baruch, Douglas W.	Court conference call and follow-up.	2.2	\$ 1,285	\$2,827.00
6/30/2017	LoBue, Joseph J.	Conference call with opposing counsel and court regarding PI motion; call with D. Baruch and J. Wollenberg regarding court call.	1.1	\$ 1,180	\$1,298.00
6/30/2017	Raol, Neaha	Review and revise draft talking points for status conference with court; review transcript/summary and next steps after call with court; review various correspondence/updates from clients and common interest counsel.	2.3	\$ 870	\$2,001.00
6/30/2017	St. Romain, Kate	Edit talking points for telephone conference with DOJ and Court and distribute to team; review email to DOJ regarding extension request; attend telephone conference with DOJ, team and Court and prepare email to team and notes regarding the same; prepare emails to Plaintiff regarding updated time line based on Court/DOJ telephone conference and hold telephone call with J. Wollenberg regarding the same; review, respond to, and chart emails from potential class members; email K. Grisez regarding naturalization interview procedure.	2.7	\$ 600	\$1,620.00
6/30/2017	Wollenberg, Jennifer	Address follow-up from PI filing; prepare for and attend telephonic conference with the Court; discussions with common interest counsel, common interest counsel, clients, internal team, and others.	6.9	\$ 975	\$6,727.50
7/1/2017	Wollenberg, Jennifer	Discussions with clients and team and work on matter, including considerations for additional class/claims and responding to PI Opposition.	2.7	\$ 975	\$2,632.50
7/3/2017	St. Romain, Kate	Attend telephone conference with J. Wollenberg and plaintiff regarding press coverage and follow-up call with J. Wollenberg regarding the same.	0.5	\$ 600	\$300.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/3/2017	Wollenberg, Jennifer	Discussions with team members and clients regarding matter; consider next steps for litigation and possible related litigation.	2.5	\$ 975	\$2,437.50
7/4/2017	Baruch, Douglas W.	Address Army developments.	1.0	\$ 1,285	\$1,285.00
7/5/2017	Baruch, Douglas W.	Address correspondence and strategy; prepare for opposition.	2.8	\$ 1,285	\$3,598.00
7/5/2017	Gates, Shaun	Review correspondence from K. St. Romain regarding status of matter.	0.2	\$ 695	\$139.00
7/5/2017	Raol, Neaha	Review material/news/articles from team, common interest counsel; correspondence with DOJ; confer with J. Wollenberg, K. St. Romain re: next steps, class certification.	2.5	\$ 870	\$2,175.00
7/5/2017	St. Romain, Kate	Research elements and sample class certifications; research, read and distribute to team articles regarding MAVNI program.	2.5	\$ 600	\$1,500.00
7/5/2017	Wollenberg, Jennifer	Work on MAVNI matter, including class certification issues, potentially expanded class, and preparation for PI Reply.	5.2	\$ 975	\$5,070.00
7/6/2017	Baruch, Douglas W.	Team meeting and statutory analysis; correspondence with DOJ.	3.5	\$ 1,285	\$4,497.50
7/6/2017	Beary, Webster	Discuss research project with B. Jensen; discuss legislative history research with J. Wollenberg; send D. Baruch prior legislative history research.	0.5	\$ 780	\$390.00
7/6/2017	Gates, Shaun	MAVNI team lunch meeting; review correspondence from K. St. Romain regarding class certification.	2.3	\$ 695	\$1,598.50
7/6/2017	LoBue, Joseph J.	Conference call with team regarding PI Motion; review materials in support of PI motion.	3.7	\$ 1,180	\$4,366.00
7/6/2017	Raol, Neaha	Team meeting; review class action material; review news articles; review documents/resources/correspondence from common interest counsel; correspondence with DOJ.	3.4	\$ 870	\$2,958.00
7/6/2017	St. Romain, Kate	Research class certification qualification periods; research, read and distribute to team articles regarding MAVNI program; prepare email to plaintiff regarding update in immigration status; research class certification structure and Judge Huvelle class certification examples and prepare email to the team regarding the same; attend team meeting regarding action plan for MAVNI lawsuit and reply brief.	3.7	\$ 600	\$2,220.00
7/6/2017	Wollenberg, Jennifer	Work on MAVNI matter, including discussions with team, prep for PI reply, work on potential expanded class.	6.1	\$ 975	\$5,947.50
7/7/2017	Baruch, Douglas W.	Research, meetings, and address DOJ opposition.	4.0	\$ 1,285	\$5,140.00
7/7/2017	Beary, Webster	Discuss legislative research task with J. Wollenberg and B. Jensen; discuss anticipated government response to the PI with J. LoBue; discuss research task with N. Raol in support of reply brief.	1.0	\$ 780	\$780.00
7/7/2017	Gates, Shaun	MAVNI team meeting to discuss DOJ's preliminary injunction opposition; review correspondence regarding potential new plaintiffs.	3.0	\$ 695	\$2,085.00
7/7/2017	LoBue, Joseph J.	Review Government Opposition to Preliminary Injunction Motion and supporting materials; meeting with team regarding Reply brief; review legal research in support of Reply brief.	5.2	\$ 1,180	\$6,136.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/7/2017	Raol, Neaha	Review PI opposition brief and team meeting re: PI briefing.	2.1	\$ 870	\$1,827.00
7/7/2017	St. Romain, Kate	Prepare emails to MAVNIs interesting in joining litigation and chart; prepare emails to MAVNI Plaintiffs regarding the preliminary injunction opposition brief; analyze DOJ opposition brief and accompanying exhibits; attend team meeting regarding action plan for reply brief and arguments regarding opposition brief; coordinate research regarding statutory interpretation with B. Jensen and J. Wollenberg;	3.1	\$ 600	\$1,860.00
7/7/2017	Wollenberg, Jennifer	Work on MAVNI matter, including discussions with clients, team meeting, review of PI Opposition, and discussions with common interest counsel.	7.7	\$ 975	\$7,507.50
7/8/2017	Beary, Webster	Discuss government response to PI motion with S. Gates.	0.2	\$ 780	\$156.00
7/8/2017	Gates, Shaun	Research for reply to DoJ's opposition to motion for preliminary injunction.	1.2	\$ 695	\$834.00
7/8/2017	LoBue, Joseph J.	Review research for Reply Brief.	4.1	\$ 1,180	\$4,838.00
7/8/2017	Wollenberg, Jennifer	Review Government Opposition to PI Motion and research/preparation of reply re same.	6.5	\$ 975	\$6,337.50
7/9/2017	Baruch, Douglas W.	Address reply brief.	1.0	\$ 1,285	\$1,285.00
7/9/2017	Gates, Shaun	Research for reply to defendants' opposition to preliminary injunction.	4.0	\$ 695	\$2,780.00
7/9/2017	LoBue, Joseph J.	Draft Reply Brief.	3.3	\$ 1,180	\$3,894.00
7/9/2017	Wollenberg, Jennifer	Research and drafting of PI Reply, including emails with team and others; review emails concerning additional class/claims.	7.8	\$ 975	\$7,605.00
7/10/2017	Baruch, Douglas W.	Researching and drafting reply brief.	5.8	\$ 1,285	\$7,453.00
7/10/2017	Beary, Webster	Draft and send string citation to J. Wollenberg on APA rule regarding delays; send J. Wollenberg research on "at least one day of service" rule; send research relating to private right of action to J. LoBue.	4.3	\$ 780	\$3,354.00
7/10/2017	Gates, Shaun	Research for reply to defendants' opposition to preliminary injunction.	2.9	\$ 695	\$2,015.50
7/10/2017	LoBue, Joseph J.	Draft Reply Brief.	4.1	\$ 1,180	\$4,838.00
7/10/2017	Raol, Neaha	Case law research for PI reply brief; send email summary and case law re: jurisdiction to J. LoBue; conferences with J. Wollenberg, W. Beary, S. Gates re: research for PI reply brief.	5.6	\$ 870	\$4,872.00
7/10/2017	St. Romain, Kate	Hold telephone call regarding preliminary injunction hearing with plaintiff; research, read and distribute to team articles regarding MAVNI program; review DHS Annual Report for 2017 and prepare outline of MAVNI discussions; prepare updates to MAVNI clients regarding preliminary injunction status update and respond to client follow-up questions; research and prepare email to J. Wollenberg regarding citizenship revocation in the United States, China and South Korea.	3.0	\$ 600	\$1,800.00
7/10/2017	Wollenberg, Jennifer	Work on PI Reply and discussions with team, client, and others regarding issues.	15.1	\$ 975	\$14,722.50
7/11/2017	Baruch, Douglas W.	Drafting and revising PI reply brief; strategy meetings.	6.0	\$ 1,285	\$7,710.00
7/11/2017	Gates, Shaun	Review and revise reply to defendants' opposition to preliminary injunction motion.	1.4	\$ 695	\$973.00
7/11/2017	LoBue, Joseph J.	Draft Reply Brief; review legal research in support of Reply Brief.	5.7	\$ 1,180	\$6,726.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/11/2017	Raol, Neaha	Revise case law and draft/revise brief sections; confer with various team members, including J. LoBue, J. Wollenberg.	8.4	\$ 870	\$7,308.00
7/11/2017	St. Romain, Kate	Review additional Army memorandum and organize research files; review and chart materials for potential N-426 issue4s; research class action opinion and orders; review client declarations and chart length of time in the United States; hold telephone calls with J. Wollenberg and S. Gates regarding preliminary injunction reply brief; review/ edit draft preliminary injunction reply motion.	4.2	\$ 600	\$2,520.00
7/11/2017	Wollenberg, Jennifer	Prepare PI Reply, including discussions with team, clients, and others.	16.0	\$ 975	\$15,600.00
7/12/2017	Baruch, Douglas W.	Drafting and finalizing PI reply brief.	5.8	\$ 1,285	\$7,453.00
7/12/2017	Beary, Webster	Team meeting to discuss next steps with respect to PI preparation.	1.1	\$ 780	\$858.00
7/12/2017	Gates, Shaun	Review and revise reply to defendants' opposition to preliminary injunction.	6.6	\$ 695	\$4,587.00
7/12/2017	Hinnant, H. Coleman	Cite check case law and statutes referenced in Nio reply memo (J. Wollenberg).	6.0	\$ 255	\$1,530.00
7/12/2017	LoBue, Joseph J.	Draft, edit Reply Brief; review research in support of Reply Brief.	6.8	\$ 1,180	\$8,024.00
7/12/2017	McNamara, Brendan	Conduct legal research for K. St. Romain regarding notice requirements and witness lists for preliminary injunction hearing.	1.9	\$ 295	\$560.50
7/12/2017	Raol, Neaha	Review case law in jurisdiction, revise brief; confer with various team members re: PI reply brief tasks, revisions and finalizing brief; team conference re: next steps.	7.9	\$ 870	\$6,873.00
7/12/2017	St. Romain, Kate	Meeting with B. Jensen regarding Chevron memo; compare Tiwari complaint and MAVNI litigation and email J. Wollenberg regarding the same; review and edit reply brief; prepare emails to MAVNI clients regarding reply brief; attend team meeting regarding preliminary injunction hearing strategy and research re same.	6.6	\$ 600	\$3,960.00
7/12/2017	Wollenberg, Jennifer	Prepare PI Reply and follow-up emails regarding the same.	14.9	\$ 975	\$14,527.50
7/13/2017	Beary, Webster	Review reply brief.	0.9	\$ 780	\$702.00
7/13/2017	Gates, Shaun	Correspondence with team regarding status of matter; team meeting to discuss oral argument.	1.1	\$ 695	\$764.50
7/13/2017	LoBue, Joseph J.	Draft outline for hearing; meetings with K. St. Romain and J. Cowdery regarding preliminary injunction hearing.	3.1	\$ 1,180	\$3,658.00
7/13/2017	McNamara, Brendan	Conduct legal research for K. St. Romain regarding notice requirements and witness lists for preliminary injunction hearing.	2.1	\$ 295	\$619.50
7/13/2017	Raol, Neaha	Confer with J. Wollenberg, S. Gates, K. St. Romain re: next tasks; confer with D. Baruch, J. LoBue, J. Wollenberg re: PI argument; review case law re: notice and comment; follow-up re: schedule/deadlines with MAO; review correspondence/info from common interest counsel.	5.4	\$ 870	\$4,698.00
7/13/2017	St. Romain, Kate	Attend team meeting regarding oral argument preparation and research regarding the same; prepare email to team summarizing testimony research; prepare for PI hearing; draft response to plaintiff regarding additional immigration representation; draft email to plaintiff regarding potential discharge and coordinate phone call with plaintiff regarding the same.	4.5	\$ 600	\$2,700.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/13/2017	Wollenberg, Jennifer	Preparation for upcoming PI hearing, including team discussions re the same.	5.4	\$ 975	\$5,265.00
7/14/2017	Baruch, Douglas W.	Address PI and class certification issues; correspondence with DOJ attorneys; address Court order; hearing preparation.	5.5	\$ 1,285	\$7,067.50
7/14/2017	Gates, Shaun	Review court order directing defendants to file documents; review enlistment contracts; correspondence with team regarding status of matter.	3.3	\$ 695	\$2,293.50
7/14/2017	LoBue, Joseph J.	Draft outline for Preliminary Injunction hearing; prepare for Preliminary Injunction hearing.	4.6	\$ 1,180	\$5,428.00
7/14/2017	Raol, Neaha	PI hearing prep; review court's order and internal correspondence re: same.	0.5	\$ 870	\$435.00
7/14/2017	St. Romain, Kate	Attend telephone call with plaintiff regarding preliminary injunction argument questions and prepare notes; preparation for preliminary injunction hearing; email plaintiff regarding additional immigration representation; prepare emails to MAVNI clients regarding preliminary injunction hearing; review and analyze Court order requesting additional documents from defendants; telephone call with plaintiff regarding preliminary injunction questions.	1.7	\$ 600	\$1,020.00
7/14/2017	Wollenberg, Jennifer	Prepare exhibit for oral argument; emails concerning Court's order to Defendants re production of documents; call with plaintiff.	2.7	\$ 975	\$2,632.50
7/15/2017	St. Romain, Kate	Edit memorandum regarding Chevron deference and email B. Jensen regarding the same.	0.7	\$ 600	\$420.00
7/16/2017	Raol, Neaha	Draft/revise talking points re: loss of status circumstances and DOJ opposition points; review material from common interest counsel, common interest counsel, client and follow-up re: same.	4.5	\$ 870	\$3,915.00
7/16/2017	St. Romain, Kate	Edit memorandum regarding Chevron deference and email B. Jensen regarding the same; review research regarding Court's ability to grant "final relief" during the preliminary injunction stage; review email from plaintiff regarding background check portal, research portal use and prepare email to team regarding research; prepare email to plaintiff regarding timeline; draft one-pagers regarding important facts for each MAVNI plaintiff.	3.4	\$ 600	\$2,040.00
7/16/2017	Wollenberg, Jennifer	Prepare for upcoming PI hearing, including emails with team members, prep of outline, and prep of demonstrative table exhibit; emails with clients and common interest counsel regarding case and materials of interest.	7.5	\$ 975	\$7,312.50
7/17/2017	Baruch, Douglas W.	Address DOJ submission; prepare for PI hearing.	5.8	\$ 1,285	\$7,453.00
7/17/2017	Gates, Shaun	Review MAVNI contract language regarding naturalization.	3.2	\$ 695	\$2,224.00
7/17/2017	LoBue, Joseph J.	Review Government filing; prepare for preliminary injunction hearing; meetings with J. Wollenberg, D. Baruch and J. Cowdery regarding PI hearing.	6.4	\$ 1,180	\$7,552.00
7/17/2017	Raol, Neaha	Draft/revise PI talking points re: status and response to DOJ argument/allegations; review declaration and documents filed by DOJ; various correspondence/conferences with J. Wollenberg, K. St. Romain, S. Gates; review evidence/rules for PI hearing prep; review media/articles.	8.8	\$ 870	\$7,656.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/17/2017	St. Romain, Kate	Hold telephone call with plaintiff regarding PI hearing; complete one-page information sheets regarding each MAVNI plaintiff and email J. Wollenberg regarding the same; review and analyze DOJ's supplemental submissions; draft summary regarding relaxed evidentiary rules at a preliminary injunction hearing; draft email to MAVNI clients regarding preliminary injunction hearing attendance.	4.7	\$ 600	\$2,820.00
7/17/2017	Wollenberg, Jennifer	Prep for PI hearing; discussions with clients and others regarding matter; review of Government's Exhibits A and B.	12.8	\$ 975	\$12,480.00
7/18/2017	Baruch, Douglas W.	Prepare for PI hearing and address research.	4.5	\$ 1,285	\$5,782.50
7/18/2017	LoBue, Joseph J.	Prepare for preliminary injunction hearing.	3.8	\$ 1,180	\$4,484.00
7/18/2017	Raol, Neaha	Review correspondence/material from client; review news/media coverage re: case/MAVNI; review/revise prep material for PI hearing (re: DOJ statements); review revised plaintiff summaries; review class action case law.	7.5	\$ 870	\$6,525.00
7/18/2017	St. Romain, Kate	Prepare summaries and exhibits for PI hearing; analyze TRAC factor standard and prepare email with case summary to J. Wollenberg.	4.7	\$ 600	\$2,820.00
7/18/2017	Wollenberg, Jennifer	Prepare for PI hearing; discussions with client, common interest counsel, and internal team; emails with Defendants' counsel.	17.6	\$ 975	\$17,160.00
7/19/2017	Baruch, Douglas W.	Moot court; PI hearing and follow-up.	7.5	\$ 1,285	\$9,637.50
7/19/2017	Raol, Neaha	Prep for and attend PI hearing; follow-up team meeting.	8.9	\$ 870	\$7,743.00
7/19/2017	St. Romain, Kate	Attend moot preliminary injunction hearing; prepare documents for PI hearing; attend preliminary injunction hearing; attend team meeting regarding preliminary injunction debrief and next tasks; draft email to MAVNI plaintiffs summarizing the preliminary injunction hearing.	8.5	\$ 600	\$5,100.00
7/19/2017	Wollenberg, Jennifer	Prepare for PI hearing and attend PI hearing; follow-up regarding the same.	8.9	\$ 975	\$8,677.50
7/20/2017	Baruch, Douglas W.	PI hearing follow-up meetings and calls; address new pleadings.	3.5	\$ 1,285	\$4,497.50
7/20/2017	LoBue, Joseph J.	Draft amended Complaint.	3.3	\$ 1,180	\$3,894.00
7/20/2017	McNamara, Brendan	Conduct legal research to locate case law in DC District Court where motions for class certification were granted; email N. Raol a summary of findings.	0.9	\$ 295	\$265.50
7/20/2017	Raol, Neaha	Confer with MAO re: hearing transcript; team call with common interest counsel re: PI hearing and order; review material from common interest counsel, K. Grisez; correspondence re: D.Md. case; draft class action motion.	5.0	\$ 870	\$4,350.00
7/20/2017	St. Romain, Kate	Review articles regarding preliminary injunction and distribute to team; prepare email regarding preliminary injunction to clients; attend team call with common interest counsel to discuss preliminary injunction; analyze Court order regarding post-preliminary injunction deadlines; prepare email to J. Wollenberg, D. Baruch, and J. LoBue regarding MAVNIs without signed N-426s; hold telephone call with plaintiff; hold telephone call with MAVNI soldier interested in joining lawsuit; review and respond to email reactions to preliminary injunction; hold meeting with J. Wollenberg regarding steps moving forward.	4.3	\$ 600	\$2,580.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/20/2017	Wollenberg, Jennifer	Address MAVNI lawsuit, including call with common interest counsel, discussions with clients, other follow-up from PI hearing, preparation of class cert motion, preparation of additional complaint, revision of complaint, etc.	8.6	\$ 975	\$8,385.00
7/21/2017	Baruch, Douglas W.	Address hearing follow-up, upcoming submissions, and client inquiries.	2.5	\$ 1,285	\$3,212.50
7/21/2017	LoBue, Joseph J.	Review legal research for amended Complaint.	1.1	\$ 1,180	\$1,298.00
7/21/2017	Raol, Neaha	Correspondence with associates re: research assignments; review DC law re: good moral character; review case law and draft motion for class certification.	3.5	\$ 870	\$3,045.00
7/21/2017	St. Romain, Kate	Prepare emails to J. Wollenberg regarding responses to plaintiffs' emails regarding the preliminary injunction and immigration/deportation issues.	0.5	\$ 600	\$300.00
7/21/2017	Wollenberg, Jennifer	Address follow-up from PI hearing, discussions with clients, emails from common interest counsel, class certification, and potential additional suit/claims.	9.0	\$ 975	\$8,775.00
7/23/2017	Wollenberg, Jennifer	Work on matter, including emails with clients.	0.5	\$ 975	\$487.50
7/24/2017	Baruch, Douglas W.	Address class issues and PI updates.	2.4	\$ 1,285	\$3,084.00
7/24/2017	Gates, Shaun	Review correspondence from team regarding status of litigation.	1.3	\$ 695	\$903.50
7/24/2017	LoBue, Joseph J.	Call with potential additional plaintiffs; meeting with litigation team regarding case status and next steps; review materials for amended complaint.	4.4	\$ 1,180	\$5,192.00
7/24/2017	Raol, Neaha	Correspondence re: PI hearing transcript; draft class certification brief and research re: same; review media updates; review E. LoPresti research/summary; confer with J. Wollenberg re: APA research and email correspondence with S. Amadour re: same; review material from client and potential other clients.	6.3	\$ 870	\$5,481.00
7/24/2017	St. Romain, Kate	Review email from plaintiff and prepare email to J. Wollenberg regarding the same; prepare team email regarding Form N-445 questions and hold telephone call with J. Wollenberg regarding the same; hold telephone call with MAVNI and email J. Wollenberg and team regarding potential additional plaintiff; draft email to J. Wollenberg regarding new potential class of plaintiffs and prepare emails to four new potential class members; coordinate telephone conference with un-signed N-426 MAVNI potential plaintiffs.	1.4	\$ 600	\$840.00
7/24/2017	Wollenberg, Jennifer	Emails regarding Order; interview of MAVNI with completed SSBI; emails with clients; discussions with common interest counsel; address materials related to PI Motion and lawsuit.	6.9	\$ 975	\$6,727.50
7/25/2017	Baruch, Douglas W.	Address PI hearing follow-up and potential new clients.	2.0	\$ 1,285	\$2,570.00
7/25/2017	LoBue, Joseph J.	Review materials for Amended Complaint.	3.2	\$ 1,180	\$3,776.00
7/25/2017	Raol, Neaha	Conference with potential class member; review E. LoPresti research and follow-up; confer with J. Wollenberg re: APA/substantive rule notice and comment issue.	1.5	\$ 870	\$1,305.00
7/25/2017	St. Romain, Kate	Attend telephone conference interviews with J. Wollenberg and N-426 MAVNIs; meet with S. Johnson regarding N-426 issues; draft email to K. Grisez regarding naturalization application barriers and review response.	2.0	\$ 600	\$1,200.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/25/2017	Wollenberg, Jennifer	Address materials relating to PI Motion and Amended Complaint, including emails from clients and common interest counsel; interviews of MAVNIs with N-426 problems.	5.5	\$ 975	\$5,362.50
7/26/2017	LoBue, Joseph J.	Draft Amended Complaint.	4.2	\$ 1,180	\$4,956.00
7/26/2017	Raol, Neaha	Confer with potential class members; follow-up with J. Wollenberg re: same; review material from clients, common interest counsel; confer with E. LoPresti re: research assignment/follow-up re: APA notice and rule-making; revise class cert brief.	2.6	\$ 870	\$2,262.00
7/26/2017	St. Romain, Kate	Address N-426 issues, including calls and correspondence with MAVNIs re same; draft email to J. Wollenberg regarding email to potential plaintiff.	1.8	\$ 600	\$1,080.00
7/26/2017	Wollenberg, Jennifer	Call with client; interviews of MAVNIs with N-426 problems; review materials related to PI Motion and lawsuit.	4.3	\$ 975	\$4,192.50
7/27/2017	LoBue, Joseph J.	Draft Amended Complaint.	3.2	\$ 1,180	\$3,776.00
7/27/2017	Raol, Neaha	Review case law on class certification/complaint; confer with J. Wollenberg re: same and draft/revise.	3.9	\$ 870	\$3,393.00
7/27/2017	St. Romain, Kate	Research and prepare an email to J. LoBue regarding deportation of Iraqis.	0.3	\$ 600	\$180.00
7/27/2017	Wollenberg, Jennifer	Address PI Motion and case, including discussions with Fried Frank team members and common interest counsel.	2.3	\$ 975	\$2,242.50
7/28/2017	Baruch, Douglas W.	Review and address DOJ filings and meetings re same.	3.5	\$ 1,285	\$4,497.50
7/28/2017	LoBue, Joseph J.	Review hearing transcript from PI hearing; review documents and declarations produced by Government; meeting with litigation team.	4.3	\$ 1,180	\$5,074.00
7/28/2017	Raol, Neaha	Review Government filing and exhibits; confer with FF team re: same and next steps; confer with E. LoPresti re: APA/notice and comment research; research for and draft class cert motion.	5.1	\$ 870	\$4,437.00
7/28/2017	St. Romain, Kate	Attend team meeting regarding Defendant's supplemental preliminary injunction filing; prepare email to J. Wollenberg and team regarding SAC investigations; analyze DOJ's supplemental filings.	2.1	\$ 600	\$1,260.00
7/28/2017	Wollenberg, Jennifer	Emails with clients and common interest counsel; review research results and other materials related to PI Motion; review Government's filing/submission and discuss with team; emails with defense counsel re redacted Exhibit A; emails to common interest counsel, clients, and others re Government's filing/submission.	6.2	\$ 975	\$6,045.00
7/29/2017	St. Romain, Kate	Review Army guidance regarding status to ship and prepare team email regarding plaintiff's email information.	0.2	\$ 600	\$120.00
7/29/2017	Wollenberg, Jennifer	Emails with common interest counsel; emails with clients; emails with team members; assess Defendants' filing/submission.	3.5	\$ 975	\$3,412.50
7/30/2017	Baruch, Douglas W.	Review DOJ filings.	1.5	\$ 1,285	\$1,927.50
7/30/2017	Gates, Shaun	Review Nio materials for enlistment contract guidance language.	0.6	\$ 695	\$417.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/30/2017	Wollenberg, Jennifer	Assess Defendants' filing/submission; emails with clients, team members, common interest counsel, and common interest counsel; review background materials and prepare items for Amended Complaint and updated Reply.	7.5	\$ 975	\$7,312.50
7/31/2017	Baruch, Douglas W.	Address response to DOJ submission; address class certification motion.	1.7	\$ 1,285	\$2,184.50
7/31/2017	Gates, Shaun	Correspondence regarding status of MAVNI case and upcoming deadlines.	0.8	\$ 695	\$556.00
7/31/2017	LoBue, Joseph J.	Draft Amended Complaint; review e-mail to opposing counsel regarding deficient document production.	3.3	\$ 1,180	\$3,894.00
7/31/2017	Raol, Neaha	Draft/revise/circulate MAVNI class certification brief; case law re: same.	6.0	\$ 870	\$5,220.00
7/31/2017	St. Romain, Kate	Review and respond to emails from MAVNI plaintiffs; research the availability of plaintiff's enlistment contract, Form 474, statelessness as a form of irreparable harm and OPM SSBI codes; prepare emails to J. Wollenberg regarding each research topic; email team regarding NBC coverage of preliminary injunction; chart additional potential plaintiff into chart; talk on phone with J. Wollenberg and K. Grisez regarding chart of naturalization possibilities and timeline.	3.0	\$ 600	\$1,800.00
7/31/2017	Wollenberg, Jennifer	Discussions with clients and team members regarding matter; call with common interest counsel regarding MAVNI issues; review and address Defendants' submissions to the Court.	6.8	\$ 975	\$6,630.00
8/1/2017	Baruch, Douglas W.	Address response to DOJ filing; address class certification motion.	1.5	\$ 1,285	\$1,927.50
8/1/2017	Gates, Shaun	Review materials for new complaint; correspondence with K. St. Romain regarding new complaint.	1.7	\$ 695	\$1,181.50
8/1/2017	LoBue, Joseph J.	Draft Amended Complaint.	4.3	\$ 1,180	\$5,074.00
8/1/2017	St. Romain, Kate	Attend team conference call with J. Wollenberg and S. Gates regarding second class of MAVNIS and coordinate team meeting regarding same; research and prepare team email regarding USCIS Policy Manual; review emails between J. Wollenberg and defense counsel; email K. Grisez and J. Wollenberg, hold telephone call with J. Wollenberg, and research regarding categories of people naturalized after less time in the U.S. than MAVNIs; prepare team email regarding changes to USCIS policy manual; review MAVNIs' documentation and draft follow-up emails to MAVNIs re same; coordinate with K. Clark research of EAJA fees; review and email to team article regarding MAVNI program.	4.8	\$ 600	\$2,880.00
8/1/2017	Wollenberg, Jennifer	Preparation for possible second complaint; team discussions re amended complaint; emails with Defendants regarding errors with their July 28 submission.	8.5	\$ 975	\$8,287.50
8/2/2017	Baruch, Douglas W.	Edits and revisions to amended complaint and meeting re same.	2.0	\$ 1,285	\$2,570.00
8/2/2017	Gates, Shaun	MAVNI team meeting; review draft amended complaint.	3.3	\$ 695	\$2,293.50
8/2/2017	LoBue, Joseph J.	Draft Amended Complaint.	5.1	\$ 1,180	\$6,018.00
8/2/2017	Raol, Neaha	MAVNI team meeting.	2.1	\$ 870	\$1,827.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/2/2017	St. Romain, Kate	Research EAJA fees, review research from K. Clark, prepare outline of EAJA fee issues for team and hold discussion with team regarding EAJA fees; hold telephone call with S. Gates regarding outstanding documents chart for new potential plaintiffs; hold meeting with K. Grisez regarding LPR-MAVNI time in country comparisons and prepare emails to K. Grisez regarding the same; attend team meeting regarding upcoming deadline and outstanding tasks; prepare email to common interest counsel regarding additional MAVNIs interested in relief; draft revised statement of preliminary injunctive relief.	3.7	\$ 600	\$2,220.00
8/2/2017	Wollenberg, Jennifer	Work on draft Amended Complaint and draft revised statement of PI relief sought; discussions with team, clients, and others re the same; team meeting re next steps.	8.8	\$ 975	\$8,580.00
8/3/2017	Baruch, Douglas W.	Edits and revisions to amended complaint; address class motion.	5.0	\$ 1,285	\$6,425.00
8/3/2017	Gates, Shaun	Research regarding APA claims for amended complaint; review amended complaint.	5.8	\$ 695	\$4,031.00
8/3/2017	LoBue, Joseph J.	Draft, edit Amended Complaint.	3.8	\$ 1,180	\$4,484.00
8/3/2017	St. Romain, Kate	Check and edit legal and factual citations in the amended complaint and email team regarding the same; email plaintiff regarding new address; review social media and emails regarding 730 day policy and email team regarding the same; meet with J. LoBue regarding N-426 language and email J. Wollenberg regarding the same; incorporate team comments into amended complaint and email team regarding outstanding comments; prepare emails to clients regarding draft complaint; edit revised statement of preliminary relief sought.	6.9	\$ 600	\$4,140.00
8/3/2017	Wollenberg, Jennifer	Work on tomorrow's filings; discussions with team, clients, and others re the same.	8.5	\$ 975	\$8,287.50
8/4/2017	Baruch, Douglas W.	Edits and revisions to amended complaint and address DOJ filing.	3.0	\$ 1,285	\$3,855.00
8/4/2017	Gates, Shaun	Revise amended complaint; coordinate filing of amended complaint.	7.7	\$ 695	\$5,351.50
8/4/2017	LoBue, Joseph J.	Draft, edit Amended Complaint.	5.1	\$ 1,180	\$6,018.00
8/4/2017	St. Romain, Kate	Hold telephone call with plaintiff and respond to emails from clients regarding amended complaint; prepare email to team regarding client responses to amended complaint; review and edit amended complaint and revised statement of preliminary relief sought; analyze DOJ's supplemental filing regarding discharge policy change; coordinate filing of amended complaint and revised statement of preliminary relief sought; research filing requirements for an amended complaint; distribute amended complaint to clients.	5.9	\$ 600	\$3,540.00
8/4/2017	Wollenberg, Jennifer	Discussions with clients, team members, and others regarding status, strategy, and today's filings; address today's filings.	3.8	\$ 975	\$3,705.00
8/5/2017	Baruch, Douglas W.	Address class motion.	1.0	\$ 1,285	\$1,285.00
8/5/2017	Wollenberg, Jennifer	Emails with common interest counsel, client, potential client, and team members regarding information, status, and strategy.	0.8	\$ 975	\$780.00
8/6/2017	Wollenberg, Jennifer	Address status and strategy, including recent filings and discussions with common interest counsel and team.	2.2	\$ 975	\$2,145.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
8/7/2017	Baruch, Douglas W.	Edits and revisions to class certification motion; address preliminary hearing issues and confer with J. LoBue.	3.5	\$ 1,285	\$4,497.50
8/7/2017	Gates, Shaun	Review correspondence with team regarding orders discharging MAVNIs.	0.2	\$ 695	\$139.00
8/7/2017	LoBue, Joseph J.	Review research for class action certification motion; review materials for supplemental brief in support of preliminary injunction motion.	2.6	\$ 1,180	\$3,068.00
8/7/2017	St. Romain, Kate	Prepare email to potential MAVNI plaintiff; prepare email to team regarding discharge policy and N-426 issues; prepare follow-up with interested class member; coordinate phone conference with common interest counsel.	0.6	\$ 600	\$360.00
8/7/2017	Wollenberg, Jennifer	Emails with clients, common interest counsel, and team regarding status and strategy.	1.5	\$ 975	\$1,462.50
8/8/2017	Baruch, Douglas W.	Draft class certification motion and address Court order.	3.0	\$ 1,285	\$3,855.00
8/8/2017	Gates, Shaun	Review materials from N-426 problems.	1.9	\$ 695	\$1,320.50
8/8/2017	Raol, Neaha	Review D. Baruch comments and revise class cert brief.	1.8	\$ 870	\$1,566.00
8/8/2017	Wollenberg, Jennifer	Review emails and information from clients, common interest counsel, common interest counsel, and others; discussions with team regarding the same as well as status, preparation of new complaint, etc.	4.5	\$ 975	\$4,387.50
8/9/2017	Baruch, Douglas W.	Address status updates and class certification issues; correspondence with DOJ re motions.	3.3	\$ 1,285	\$4,240.50
8/9/2017	Gates, Shaun	Team meeting to discuss 730 day extension; review information from MAVNIs re N426 problems.	3.1	\$ 695	\$2,154.50
8/9/2017	LoBue, Joseph J.	Review, edit class certification motion; call with common interest counsel regarding case status; conference call with potential additional plaintiffs.	3.3	\$ 1,180	\$3,894.00
8/9/2017	Raol, Neaha	Team meeting and call with common interest counsel; confer with J. Wollenberg re: meet and confer requirement, class cert brief; review local rules re meet and confer; review DOJ correspondence and info from common interest counsel.	2.5	\$ 870	\$2,175.00
8/9/2017	St. Romain, Kate	Prepare email to plaintiff regarding current status; attend telephone conference with team and common interest counsel regarding 730 day extension; coordinate meeting with class member regarding unfavorable background investigation and discharge; review new information regarding CI screenings; coordinate meeting with additional Plaintiffs with N-426 issues; meet with K. Clark regarding new research assignment on benefits of citizenship; prepare team email containing information from common interest counsel; email plaintiff regarding request for evidence; hold telephone call with and email J. Wollenberg regarding DOJ comments about class certification; email interested potential plaintiffs regarding case status.	4.0	\$ 600	\$2,400.00
8/9/2017	Wollenberg, Jennifer	Address status and strategy, including class cert motion, call with potential plaintiffs, and communications with clients and others.	6.9	\$ 975	\$6,727.50
8/10/2017	Baruch, Douglas W.	Edits and revisions to class certification papers; research re same.	2.5	\$ 1,285	\$3,212.50
8/10/2017	Gates, Shaun	Interview MAVNI re N-426 problem; review class certification motion.	2.8	\$ 695	\$1,946.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
8/10/2017	Hinnant, H. Coleman	Cite check Nio class certification brief (N. Raol).	5.5	\$ 255	\$1,402.50
8/10/2017	LoBue, Joseph J.	Review, edit class certification motion; review, edit declaration in support of class certification Motion; meetings with J. Wollenberg and D. Baruch regarding class certification.	4.6	\$ 1,180	\$5,428.00
8/10/2017	Raol, Neaha	Various conferences, including with J. Lobue and D. Baruch; draft attorney declaration, review comments/edits to draft brief and follow-up/revise accordingly; review info from common interest counsel, clients.	6.0	\$ 870	\$5,220.00
8/10/2017	St. Romain, Kate	Hold telephone call with S. Gates regarding N-426 issues; hold telephone call with J. Wollenberg regarding class action language and research.	0.7	\$ 600	\$420.00
8/10/2017	Wollenberg, Jennifer	Address class cert motion draft, status, and strategy, including communications with team, DOJ attorneys, clients, and others.	8.5	\$ 975	\$8,287.50
8/11/2017	Baruch, Douglas W.	Finalize class certification brief and supporting documents.	2.5	\$ 1,285	\$3,212.50
8/11/2017	Beary, Webster	Research DC federal cases interpreting federal rule and send findings to J. Wollenberg.	1.3	\$ 780	\$1,014.00
8/11/2017	Gates, Shaun	Review class certification and related submissions.	4.6	\$ 695	\$3,197.00
8/11/2017	Hinnant, H. Coleman	Confer with attorneys regarding proper citation form for motions previously filed in Nio; consult Bluebook; pull and check Pacer for significant recent filings in Wagafe; cite check multiple cases cited in footnote added to brief (N. Raol).	2.5	\$ 255	\$637.50
8/11/2017	LoBue, Joseph J.	Review, edit class certification motion and supporting materials; meetings with J. Wollenberg and N. Raol regarding same.	2.5	\$ 1,180	\$2,950.00
8/11/2017	Raol, Neaha	Confer with various team members including J. LoBue and J. Wollenberg; incorporate comments/edits from team and revise/finalize class cert motion and related papers for filing.	7.9	\$ 870	\$6,873.00
8/11/2017	St. Romain, Kate	Review and respond emails from clients regarding immigration policies; prepare exhibit of transcript excerpts for motion for class certification; prepare update email to MAVNI Plaintiffs with N-426 issues; attend meeting with N. Raol and J. Wollenberg regarding outstanding items for class certification motion; prepare email to N. Raol regarding outstanding information for D. Baruch declaration; review/edits to the motion for class certification; review and edit the proposed order granting class certification.	4.8	\$ 600	\$2,880.00
8/11/2017	Wollenberg, Jennifer	Review information from clients and others re background and strategy; finalize and file class certification motion.	9.5	\$ 975	\$9,262.50
8/12/2017	Wollenberg, Jennifer	Address distribution of and other follow-up re yesterday's filing.	0.5	\$ 975	\$487.50
8/13/2017	St. Romain, Kate	Prepare emails to client regarding class certification filing; prepare email to plaintiff regarding status and remaining claims in the preliminary injunction filing.	0.6	\$ 600	\$360.00
8/13/2017	Wollenberg, Jennifer	Address follow-up re recent updates in case, including email with team.	0.5	\$ 975	\$487.50
8/14/2017	Baruch, Douglas W.	Review and address DOJ response.	3.0	\$ 1,285	\$3,855.00
8/14/2017	Beary, Webster	Meet with MAVNI team to discuss government's PI opposition motion.	1.3	\$ 780	\$1,014.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
8/14/2017	Gates, Shaun	Team meeting to discuss supplemental reply brief; review defendants' opposition to preliminary injunction; address N-426 issues.	4.2	\$ 695	\$2,919.00
8/14/2017	LoBue, Joseph J.	Review Government Supplemental brief; draft outline for Supplemental Reply brief; review research for Supplemental Reply brief.	6.4	\$ 1,180	\$7,552.00
8/14/2017	Raol, Neaha	Confer with J. LoBue and J. Wollenberg re: upcoming briefing and potential arguments; review papers filed by government; team meeting.	3.5	\$ 870	\$3,045.00
8/14/2017	St. Romain, Kate	Prepare email to MAVNI interested in joining lawsuit and email J. Wollenberg and J. LoBue regarding MAVNIs active duty circumstances; prepare emails to MAVNI clients regarding Defendants' supplemental PI opposition; coordinate and attend team meeting regarding Defendants' supplemental PI opposition and plan for supplemental reply brief; analyze Defendants' supplemental PI opposition.	2.9	\$ 600	\$1,740.00
8/14/2017	Wollenberg, Jennifer	Emails re class certification motion and FOIA request; review materials from clients and other MAVNIs; address client issues; review Supplemental Opposition and discussions regarding the same.	7.3	\$ 975	\$7,117.50
8/15/2017	Baruch, Douglas W.	Reply brief and strategy.	1.5	\$ 1,285	\$1,927.50
8/15/2017	Beary, Webster	Draft inserts for reply brief on APA section 706(1).	7.0	\$ 780	\$5,460.00
8/15/2017	Gates, Shaun	Review defendants' opposition to preliminary injunction; draft section regarding APA claims.	7.6	\$ 695	\$5,282.00
8/15/2017	LoBue, Joseph J.	Review research for Supplemental Reply brief; draft Supplemental Reply brief.	6.2	\$ 1,180	\$7,316.00
8/15/2017	McNamara, Brendan	Read case law related to ripeness cited in government's response to motion for preliminary injunction.	0.5	\$ 295	\$147.50
8/15/2017	Raol, Neaha	Review DoD argument re: final agency action and ripeness/standing; legal research re: same; review material from clients/common interest counsel; follow-up with MAO re: D.Md. case and docket.	10.2	\$ 870	\$8,874.00
8/15/2017	St. Romain, Kate	Telephone call with J. LoBue regarding amended complaint; review MAVNI's discharge orders and research discharge codes; prepare emails to plaintiffs regarding recent filings of class certification and Defendants opposition; email team regarding plaintiff CI interview.	0.5	\$ 600	\$300.00
8/15/2017	Wollenberg, Jennifer	Discussions with clients, common interest partners, and internal team regarding status and strategy; research and preparation of reply to supplemental opposition; discussions with defense counsel regarding extension requests.	5.9	\$ 975	\$5,752.50
8/16/2017	Baruch, Douglas W.	Address PI reply and correspondence with DOJ.	2.0	\$ 1,285	\$2,570.00
8/16/2017	Beary, Webster	Edit draft inserts for reply brief on APA section 706(1) and send to J. Wollenberg for review.	8.0	\$ 780	\$6,240.00
8/16/2017	Gates, Shaun	Draft section of reply brief to defendants' opposition to preliminary injunction regarding APA claims.	6.1	\$ 695	\$4,239.50
8/16/2017	LoBue, Joseph J.	Draft Supplemental Reply brief.	5.5	\$ 1,180	\$6,490.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
8/16/2017	McNamara, Brendan	Research and read case law cited in government's brief; draft summaries of cases for N. Raol.	11.7	\$ 295	\$3,451.50
8/16/2017	Raol, Neaha	Review case law cited by government; confer with B. McNamara re: same; draft DoD section of brief; confer with J. LoBue, J. Wollenberg re: same.	8.5	\$ 870	\$7,395.00
8/16/2017	St. Romain, Kate	Review emails from MAVNI and plaintiffs and prepare email responses; research and prepare email to J. Wollenberg regarding D.C. District Court rules regarding motions for extension.	0.8	\$ 600	\$480.00
8/16/2017	Wollenberg, Jennifer	Discussions with clients, team, and others regarding updates, status, and strategy; address response to Supplemental Opposition.	11.2	\$ 975	\$10,920.00
8/17/2017	Baruch, Douglas W.	Address reply brief.	2.5	\$ 1,285	\$3,212.50
8/17/2017	Beary, Webster	Edit draft inserts for reply brief on APA section 706(1) and send to J. Wollenberg for review.	4.5	\$ 780	\$3,510.00
8/17/2017	Gates, Shaun	Draft section of reply brief to defendants' opposition to preliminary injunction regarding APA claims.	2.6	\$ 695	\$1,807.00
8/17/2017	LoBue, Joseph J.	Review research for Supplemental Reply brief; draft Supplemental Reply brief.	7.3	\$ 1,180	\$8,614.00
8/17/2017	Raol, Neaha	Review/revise draft section of brief (re: DoD); confer with J. Wollenberg, K. St. Romain re: same; team meeting re: status and next steps; review case law.	8.9	\$ 870	\$7,743.00
8/17/2017	St. Romain, Kate	Review email from class member and prepare response; distribute media update to team; research citation for DoD concession that signing N-426 is ministerial; hold telephone call with J. Wollenberg regarding DoD ministerial concession and predicted DOJ extension plan; research, review, and prepare email to N. Raol regarding DC Circuit and Judge Huvelle cases regarding two-part test for final agency action; draft outstanding footnote and arbitrary and capricious paragraph for reply to supplemental opposition brief; attend MAVNI team meeting regarding reply to supplemental PI opposition; prepare emails to clients regarding preliminary injunction reply status.	5.1	\$ 600	\$3,060.00
8/17/2017	Wollenberg, Jennifer	Prepare reply to supplemental opposition, including team meetings re the same; emails with clients and others re status, strategy, and information.	14.9	\$ 975	\$14,527.50
8/18/2017	Baruch, Douglas W.	Edits and revisions to supplemental PI memorandum.	8.5	\$ 1,285	\$10,922.50
8/18/2017	Beary, Webster	Review brief; discuss edits with J. Wollenberg.	3.2	\$ 780	\$2,496.00
8/18/2017	Gates, Shaun	Review and revise supplemental memorandum in support of preliminary injunction prior to filing.	10.8	\$ 695	\$7,506.00
8/18/2017	Hinnant, H. Coleman	Cite check and Shepardize Nio/MAVNI reply brief (N. Raol).	7.5	\$ 255	\$1,912.50
8/18/2017	LoBue, Joseph J.	Review research for Supplemental Reply brief; draft, edit Supplemental Reply brief.	8.5	\$ 1,180	\$10,030.00
8/18/2017	Raol, Neaha	Review/revise brief for filing; filing logistics and prepare/review exhibits; confer with various team members, including J. Wollenberg, J. LoBue, D. Baruch, S. Gates, K. St. Romain, C. Hinnant, MAO re: brief/filing.	9.3	\$ 870	\$8,091.00

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8/18/2017	St. Romain, Kate	Address supplemental reply brief; prepare emails to clients regarding the supplemental reply brief.	9.3	\$ 600	\$5,580.00
8/18/2017	Wollenberg, Jennifer	Emails with clients and others regarding status, strategy, and recent information; prepare and file reply to supplemental opposition.	18.5	\$ 975	\$18,037.50
8/19/2017	Wollenberg, Jennifer	Address distribution of Supplemental Reply filing.	0.8	\$ 975	\$780.00
8/20/2017	Baruch, Douglas W.	Address PI hearing.	0.6	\$ 1,285	\$771.00
8/20/2017	Wollenberg, Jennifer	Emails with common interest counsel, team regarding recent updates in Nio case.	1.9	\$ 975	\$1,852.50
8/21/2017	Baruch, Douglas W.	Address PI hearing and strategy.	3.0	\$ 1,285	\$3,855.00
8/21/2017	Beary, Webster	Team meeting; research rules pertaining to interlocutory appeals.	1.0	\$ 780	\$780.00
8/21/2017	LoBue, Joseph J.	Meeting with MAVNI litigation team; prepare for PI motion hearing.	5.5	\$ 1,180	\$6,490.00
8/21/2017	St. Romain, Kate	Team meeting regarding preliminary injunction hearing; review information for MAVNis with N-426 issues.	0.8	\$ 600	\$480.00
8/21/2017	Wollenberg, Jennifer	Prepare for upcoming hearing, including review of research results, review of background materials, and discussion with team members.	5.1	\$ 975	\$4,972.50
8/22/2017	Baruch, Douglas W.	Prepare for PI hearing.	4.0	\$ 1,285	\$5,140.00
8/22/2017	Beary, Webster	Research rules pertaining to interlocutory appeals and send findings to J. Wollenberg.	1.6	\$ 780	\$1,248.00
8/22/2017	LoBue, Joseph J.	Prepare for PI motion hearing.	5.5	\$ 1,180	\$6,490.00
8/22/2017	Raol, Neaha	Review and summarize DoD ripeness cases and potential responses/points (prep for 8/23 PI hearing); confer with J. LoBue, J. Wollenberg re: same; review additional material from common interest counsel.	6.1	\$ 870	\$5,307.00
8/22/2017	St. Romain, Kate	Hold telephone call with plaintiff regarding F-1 visa status; research and hold telephone call with J. Wollenberg regarding Plaintiff's CI dates; prepare emails to client regarding CI schedule and chart responses; prepare potential exhibits for preliminary injunction hearing; communicate with J. Wollenberg regarding cases, documents and technology for preliminary injunction hearing.	1.9	\$ 600	\$1,140.00
8/22/2017	Wollenberg, Jennifer	Prepare for upcoming hearing, including meeting with Fried Frank team members, emails with clients, and review of materials.	6.4	\$ 975	\$6,240.00
8/23/2017	Baruch, Douglas W.	Prepare for PI hearing; PI hearing and follow-up.	6.7	\$ 1,285	\$8,609.50
8/23/2017	Raol, Neaha	Prep for and attend PI hearing; follow-up team meeting and call with common interest counsel.	7.2	\$ 870	\$6,264.00
8/23/2017	St. Romain, Kate	Attend hearing; prepare email to client regarding preliminary injunction hearing update.	6.4	\$ 600	\$3,840.00
8/23/2017	Wollenberg, Jennifer	Prepare for and attend continued PI motion hearing; post-hearing follow-up, including team meeting, discussion with common interest counsel, and communications with clients.	14.1	\$ 975	\$13,747.50
8/24/2017	Baruch, Douglas W.	Address strategy, client updates, and discovery options.	3.5	\$ 1,285	\$4,497.50
8/24/2017	Beary, Webster	Research rules on classified evidence in a civil trial; send findings to J. Wollenberg.	1.0	\$ 780	\$780.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/24/2017	McNamara, Brendan	Meet with K. St. Romain; research and read case and secondary sources on timing for, and expediting of, discovery period.	4.6	\$ 295	\$1,357.00
8/24/2017	St. Romain, Kate	Review client emails and email J. Wollenberg regarding the same; phone call with J. Wollenberg regarding N-426 complaint and responses to client questions; meet with B. McNamara to discuss expedited discovery timeline and process	0.8	\$ 600	\$480.00
8/24/2017	Wollenberg, Jennifer	Follow-on research and work from yesterday's hearing, including research re classified information, emails to clients and others, and review of transcript and other materials.	10.0	\$ 975	\$9,750.00
8/25/2017	LoBue, Joseph J.	Conference call with common interest counsel; conference call with common interest counsel; review PI motion hearing transcript.	2.9	\$ 1,180	\$3,422.00
8/25/2017	McNamara, Brendan	Research and read case law and secondary sources on timing for, and expediting of, the discovery period and discovery schedule.	5.3	\$ 295	\$1,563.50
8/25/2017	St. Romain, Kate	Attend call with J. Wollenberg regarding clients' calls and follow-up re same; prepare email to clients regarding Judge's order and minute entry; prepare team email regarding plaintiff's SSBI results.	0.9	\$ 600	\$540.00
8/26/2017	Raol, Neaha	Review common interest counsel correspondence.	0.4	\$ 870	\$348.00
8/26/2017	Wollenberg, Jennifer	Address new arguments; emails with Nio clients and team members regarding MAVNI instructions; address other recent updates, including emails from common interest counsel.	2.5	\$ 975	\$2,437.50
8/27/2017	McNamara, Brendan	Finalize outline for expedited discovery.	0.4	\$ 295	\$118.00
8/28/2017	Baruch, Douglas W.	Follow up re PI hearing and address classified information issues.	2.8	\$ 1,285	\$3,598.00
8/28/2017	McNamara, Brendan	Meet with K. St. Romain to discuss issues related to expedited discovery; research timing for issuance of scheduling order.	2.2	\$ 295	\$649.00
8/28/2017	St. Romain, Kate	Research expedited discovery and meet with B. McNamara regarding research; hold telephone call with J. Wollenberg regarding new complaint and preliminary injunction; email plaintiff regarding CI interview; revise declaration for MAVNI and follow-up re same.	2.8	\$ 600	\$1,680.00
8/29/2017	McNamara, Brendan	Meet with D. Baruch, J. Wollenberg, and K. St. Romain to discuss possibilities for expediting discovery; pull and review briefs from expedited discovery cases; email briefs and cases to J. Wollenberg.	1.9	\$ 295	\$560.50
8/29/2017	Raol, Neaha	Review draft from PC; follow-up/assemble material for PC; review D. Md. papers.	1.2	\$ 870	\$1,044.00
8/30/2017	Baruch, Douglas W.	Address DOJ filing and status.	0.8	\$ 1,285	\$1,028.00
8/30/2017	Raol, Neaha	Review defendants' filings, update from client, PC correspondence.	1.6	\$ 870	\$1,392.00
8/31/2017	Gates, Shaun	MAVNI. Review defendants' response to 08/24/17 order of court.	0.5	\$ 695	\$347.50
8/31/2017	Raol, Neaha	Review common interest counsel correspondence and follow-up from K. Grisez; confer with potential class member; review notice rules and confer with J. Wollenberg, K. St. Romain, MAO re: same.	1.1	\$ 870	\$957.00
9/1/2017	Baruch, Douglas W.	Address DOJ filings.	0.8	\$ 1,285	\$1,028.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/1/2017	Raol, Neaha	Revise/finalize notice of related action for filing; review DOJ submission/weekly report.	1.0	\$ 895	\$895.00
9/2/2017	Wollenberg, Jennifer	Emails with Nio clients regarding weekly report from defense counsel; review draft complaint from common interest counsel; emails with K. Grisez re situations of Nio clients.	1.5	\$ 975	\$1,462.50
9/3/2017	Wollenberg, Jennifer	Address issues with Nio weekly update, including emails with K. Grisez and draft email to defense counsel; emails with plaintiff regarding immigration issues; emails re common interest counsel draft.	3.9	\$ 975	\$3,802.50
9/4/2017	Baruch, Douglas W.	Address government filings and strategy re responses.	1.2	\$ 1,285	\$1,542.00
9/4/2017	Wollenberg, Jennifer	Address N-426 issues; draft email to defense counsel regarding issues with weekly reporting in Nio; emails with K. Grisez regarding weekly reporting in Nio and other issues re Nio clients.	3.5	\$ 975	\$3,412.50
9/5/2017	Baruch, Douglas W.	Call with common interest counsel, address DOJ chart, address strategy.	2.2	\$ 1,285	\$2,827.00
9/5/2017	LoBue, Joseph J.	Review and comment on similar case complaint; meeting with J. Wollenberg regarding similar case complaint; telephone call with common interest counsel regarding similar case complaint.	2.9	\$ 1,180	\$3,422.00
9/5/2017	Raol, Neaha	Draft and revise notice for court re: defendants' weekly report deficiencies; review correspondence from DOJ re: same; confer with J. Wollenberg re: same; review D. Baruch/J. LoBue edits/comments; review articles/news re: case; client correspondence.	5.4	\$ 895	\$4,833.00
9/5/2017	St. Romain, Kate	Review Defendants' amended weekly report in response to the Court's Order and distribute to clients.	0.2	\$ 695	\$139.00
9/5/2017	Wollenberg, Jennifer	Address comments and other emails re common interest counsel draft complaint; conference call regarding same; address deficiencies with weekly reporting from defendants; emails with clients re status and concerns.	4.1	\$ 975	\$3,997.50
9/6/2017	Baruch, Douglas W.	Review and address PI decision; team meeting re same.	2.0	\$ 1,285	\$2,570.00
9/6/2017	LoBue, Joseph J.	Review court order and opinion; meeting with litigation team re next steps.	1.9	\$ 1,180	\$2,242.00
9/6/2017	McNamara, Brendan	Read court's opinion denying motion for preliminary injunction.	0.5	\$ 295	\$147.50
9/6/2017	Raol, Neaha	Correspondence with DOJ re: weekly report/order; review univision article, other news coverage; review court's PI opinion; confer with various team members re: same.	1.5	\$ 895	\$1,342.50
9/6/2017	St. Romain, Kate	Prepare emails to plaintiffs regarding Defendants' amended weekly report.	1.8	\$ 695	\$1,251.00
9/6/2017	Wollenberg, Jennifer	Emails with Nio clients re updates and questions; emails with K. Grisez re DACA, Chevron, and other issues; emails with defense counsel on Nio re weekly reporting; address PI Order and discussions re same.	6.0	\$ 975	\$5,850.00
9/7/2017	Baruch, Douglas W.	Follow up re PI order; address strategy.	1.4	\$ 1,285	\$1,799.00
9/7/2017	Gates, Shaun	Team meeting to discuss status of matter.	1.5	\$ 745	\$1,117.50
9/7/2017	LoBue, Joseph J.	Meeting with litigation team re discovery and case management.	0.9	\$ 1,180	\$1,062.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
9/7/2017	McNamara, Brendan	Attend MAVNI team meeting to discuss issues and strategy going forward.	1.5	\$ 295	\$442.50
9/7/2017	Raol, Neaha	Team meeting; review news/articles with DoD statements re: MAVNI.	2.1	\$ 895	\$1,879.50
9/7/2017	St. Romain, Kate	Attend MAVNI team meeting; review articles discussing MAVNI lawsuit and DACA policies and prepare email to N. Raol and J. Wollenberg analyzing articles; analyze preliminary injunction decision and meet with J. Wollenberg and D. Baruch regarding opinion.	2.5	\$ 695	\$1,737.50
9/7/2017	Wollenberg, Jennifer	Team meeting to discuss status and strategy; call with various clients re PI Order; emails and other discussions with team, common interest counsel, and others regarding status and strategy; emails with common interest counsel.	3.9	\$ 975	\$3,802.50
9/8/2017	Baruch, Douglas W.	Address report and DOD conduct.	1.4	\$ 1,285	\$1,799.00
9/8/2017	Gates, Shaun	Review article on PI opinion.	0.2	\$ 745	\$149.00
9/8/2017	LoBue, Joseph J.	Review defendant's weekly report to the court.	0.2	\$ 1,180	\$236.00
9/8/2017	Raol, Neaha	Review client correspondence; defendants' weekly report; review press coverage/articles re: matter.	1.0	\$ 895	\$895.00
9/8/2017	St. Romain, Kate	Review Defendants' weekly status report, distribute to clients, and hold telephone call with J. Wollenberg regarding distribution.	0.5	\$ 695	\$347.50
9/8/2017	Wollenberg, Jennifer	Emails with common interest counsel and team re MAVNI updates, including discharges and the like; calls with various clients re PI Order.	3.1	\$ 975	\$3,022.50
9/9/2017	Wollenberg, Jennifer	Review emails from common interest counsel; team email re Deferred Action denial.	0.3	\$ 975	\$292.50
9/11/2017	Baruch, Douglas W.	Address status and strategy.	1.8	\$ 1,285	\$2,313.00
9/11/2017	Gates, Shaun	Call with putative class member; correspondence regarding interview.	0.7	\$ 745	\$521.50
9/11/2017	St. Romain, Kate	Hold telephone call with S. Gates and potential MAVNI class member, and report to J. Wollenberg regarding story of MAVNI.	0.5	\$ 695	\$347.50
9/11/2017	Wollenberg, Jennifer	Emails with clients re updates and concerns; emails with common interest counsel re updates and strategy.	2.6	\$ 975	\$2,535.00
9/12/2017	Baruch, Douglas W.	Address client inquiries and status.	1.5	\$ 1,285	\$1,927.50
9/12/2017	Raol, Neaha	Review updates from clients, potential class members; review D. Md. government papers filed.	2.0	\$ 895	\$1,790.00
9/12/2017	St. Romain, Kate	Prepare email to potential MAVNI plaintiff regarding scope of representation and class action and proposed email to contact from common interest counsel.	0.5	\$ 695	\$347.50
9/12/2017	Wollenberg, Jennifer	Call with potential class member re MAVNI updates; emails with K. Grisez re MAVNI immigration issue; address updates regarding MAVNIs.	2.9	\$ 975	\$2,827.50
9/13/2017	Baruch, Douglas W.	Address strategy and new developments.	2.5	\$ 1,285	\$3,212.50
9/13/2017	Gates, Shaun	Correspondence on mass removals; t/c with common interest counsel.	1.7	\$ 745	\$1,266.50
9/13/2017	LoBue, Joseph J.	Conference calls with joint-interest counsel regarding status of cases and action items; meetings with D. Baruch and J. Wollenberg regarding class member discharges; meetings with D. Baruch and J. Wollenberg regarding case status and action items.	3.4	\$ 1,180	\$4,012.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/13/2017	Raol, Neaha	Team conference; review related news.	1.3	\$ 895	\$1,163.50
9/13/2017	St. Romain, Kate	Attend telephone conference with team and common interest counsel regarding discharges and state of MAVNI program; prepare email to team regarding MAVNI program in the news; prepare email to common interest counsel regarding key documents in District of Maryland MAVNI case; prepare emails to J. LoBue regarding Defendants' statements about plans to mass discharge MAVNIs; review emails from clients regarding mass MAVNI contract cancellations.	3.3	\$ 695	\$2,293.50
9/13/2017	Wollenberg, Jennifer	Call with client re PI Order and next steps; call with common interest counsel and team meeting; discussions and response to news of MAVNI discharges; call with client regarding RFE.	7.5	\$ 975	\$7,312.50
9/14/2017	Baruch, Douglas W.	Call with common interest counsel and address filings.	1.5	\$ 1,285	\$1,927.50
9/14/2017	LoBue, Joseph J.	Conference calls with joint-interest counsel; review materials regarding discharge of class members.	2.3	\$ 1,180	\$2,714.00
9/14/2017	St. Romain, Kate	Prepare email to team regarding research and factual updates following call with common interest counsel; email common interest counsel key MAVNI litigation documents; email D. Baruch and J. LoBue regarding meeting with common interest counsel regarding access to classified documents.	0.7	\$ 695	\$486.50
9/14/2017	Wollenberg, Jennifer	Address updates re individual clients and other MAVNIs; calls and emails with common interest counsel and others regarding updates and strategy.	4.8	\$ 975	\$4,680.00
9/15/2017	Baruch, Douglas W.	Multiple calls and meetings re discharge issues and defense filings.	2.9	\$ 1,285	\$3,726.50
9/15/2017	Gates, Shaun	Review defendants' opposition to class certification motion; team meeting.	2.1	\$ 745	\$1,564.50
9/15/2017	LoBue, Joseph J.	Review defendants' opposition to class certification motion; review defendants' motion to dismiss; draft outline for Reply brief for class certification motion; review order by Court regarding reporting.	3.6	\$ 1,180	\$4,248.00
9/15/2017	Raol, Neaha	Confer with J. Wollenberg, K. St. Romain re: survey; review news articles re: Army actions; review DOJ filings - MTD and class cert opposition papers; team conference re: same; review correspondence with DOJ re: discharge; review court's order re: additional info from DOJ; review DOJ status report.	5.0	\$ 895	\$4,475.00
9/15/2017	St. Romain, Kate	Prepare email to team regarding media coverage of "loss forgiveness" discharges; review new Court order regarding additional reporting requirements; prepare MAVNI survey for discharged MAVNI soldiers; prepare email to plaintiff regarding weekly reporting order and MAVNI discharges; analyze Defendants' opposition to class certification and attend team meeting to discuss plan for class certification reply; prepare emails to clients regarding weekly reporting, class certification and motion to dismiss.	4.8	\$ 695	\$3,336.00
9/15/2017	Wollenberg, Jennifer	Address updates and strategy re MAVNIs; emails and discussions re MAVNI treatment and news; review of and team meeting regarding Government filings.	6.5	\$ 975	\$6,337.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/15/2017	Woods, Elizabeth	Review plaintiff's prior filings, including amended complaint and motion to certify class action; review defendants' opposition to motion to certify class action; review case law regarding eligibility of future class members to participate in existing litigation of class action under Federal Rule 23(a).	4.6	\$ 520	\$2,392.00
9/16/2017	Raol, Neaha	Review research from E. Woods concerning various points in class cert opposition/reply brief; confer with J. Wollenberg re: same.	1.1	\$ 895	\$984.50
9/16/2017	Wollenberg, Jennifer	Emails with clients re weekly reporting; review research re class cert reply.	0.9	\$ 975	\$877.50
9/16/2017	Woods, Elizabeth	Review case law regarding eligibility of future members of a class action class to join class in existing litigation under Federal Rule 23(a); review case law regarding adequacy of counsel under Federal Rule 23(g); draft summaries of cases reviewed; download reviewed cases as PDF documents and highlight relevant portions of each case; draft emails containing case summaries and case PDF documents to S. Gates and N. Raol.	8.4	\$ 520	\$4,368.00
9/17/2017	Gates, Shaun	Review defendants' motion to dismiss.	1.1	\$ 745	\$819.50
9/17/2017	Raol, Neaha	Review research from E. Woods, follow-up research; draft class certification reply brief sections; confer with J. Wollenberg re: same.	9.1	\$ 895	\$8,144.50
9/17/2017	Wollenberg, Jennifer	Email from client re RFE; team emails re discharge news; team emails re motion to dismiss; review research re class cert reply; emails with common interest counsel and others re status and updates.	1.2	\$ 975	\$1,170.00
9/18/2017	Baruch, Douglas W.	Draft response re class certification.	1.5	\$ 1,285	\$1,927.50
9/18/2017	Raol, Neaha	Research re: class cert reply; review cases USG cited in opposition; draft class cert reply arguments; confer with E. Woods re: research/distinguishing USG cases cited; review counsel class action experience; review USG filing.	10.1	\$ 895	\$9,039.50
9/18/2017	Wollenberg, Jennifer	Discussions re client's RFE response; discuss class cert reply; discuss inquiry; call with common interest counsel; email to opposing counsel re weekly reports.	1.5	\$ 975	\$1,462.50
9/18/2017	Woods, Elizabeth	Conference with N. Raol to discuss research assignment regarding class action certification; research D.C. Circuit case law regarding future class members' effect on class action certification; draft summaries of case law regarding future class members' effect on class action certification; draft paragraph for inclusion in Reply to Defendants' Opposition responding to arguments regarding future class members' effect on class certification.	4.2	\$ 520	\$2,184.00
9/19/2017	Raol, Neaha	Draft class cert reply brief; review E. Woods research and conduct follow-up research as needed re: same.	2.3	\$ 895	\$2,058.50
9/19/2017	St. Romain, Kate	Review revised Amended Weekly Status Report.	0.2	\$ 695	\$139.00
9/19/2017	Wollenberg, Jennifer	Emails re MAVNI updates, including from common interest counsel; emails re client RFE.	0.5	\$ 975	\$487.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/19/2017	Woods, Elizabeth	Review case law in D.C. Circuit regarding class action certification for use in Reply to Defendants' Opposition to Plaintiffs' Motion for Class Certification; draft summaries and parentheticals of cases regarding class action certification in the D.C. Circuit; draft and send e-mail containing summaries and analysis to N. Raol.	3.1	\$ 520	\$1,612.00
9/20/2017	Raol, Neaha	Draft/revise MAVNI class certification reply brief; confer/follow-up with E. Woods re case research.	13.7	\$ 895	\$12,261.50
9/20/2017	Wollenberg, Jennifer	Address RFE to client; emails with common interest counsel; emails with putative class member re CAF adjudications.	1.0	\$ 975	\$975.00
9/20/2017	Woods, Elizabeth	Review case law in the D.C. Circuit regarding class certification in the context of APA "undue delay" claims; draft summaries of cases regarding class certification in the context of APA "undue delay" claims; draft email containing summaries and analysis to N. Raol.	3.3	\$ 520	\$1,716.00
9/21/2017	Baruch, Douglas W.	Reply re class certification motion.	5.0	\$ 1,285	\$6,425.00
9/21/2017	Gates, Shaun	Review plaintiff materials for RFE response.	1.1	\$ 745	\$819.50
9/21/2017	LoBue, Joseph J.	Draft opposition to Motion to Dismiss.	3.5	\$ 1,180	\$4,130.00
9/21/2017	Raol, Neaha	Draft/revise class cert brief and circulate to team; follow-up research re: same (class actions re: APA claims); confer with J. Wollenberg re: same; revise/incorporate D. Baruch comments, J. Wollenberg notes, addl. research into draft and circulate to team.	6.9	\$ 895	\$6,175.50
9/21/2017	St. Romain, Kate	Analyze Motion to Dismiss.	0.9	\$ 695	\$625.50
9/21/2017	Wollenberg, Jennifer	Emails/discussions re client's RFE; address reply for class cert motion; review MTD.	4.5	\$ 975	\$4,387.50
9/21/2017	Woods, Elizabeth	Review D.C. Circuit case law regarding Rule 23(a) class certification under the typicality requirement; draft case summaries and analyze under which statements the cases would best fit in Plaintiffs' reply to Defendant's Opposition to class certification; draft emails containing summaries and analysis to N. Raol.	4.8	\$ 520	\$2,496.00
9/22/2017	Gates, Shaun	Review reply to class certification opposition.	1.7	\$ 745	\$1,266.50
9/22/2017	Hinnant, H. Coleman	Proofread and cite check class certification reply brief (J. Wollenberg).	4.5	\$ 255	\$1,147.50
9/22/2017	LoBue, Joseph J.	Review, edit Reply brief in support of class certification motion.	1.7	\$ 1,180	\$2,006.00
9/22/2017	Raol, Neaha	Revise/finalize class cert reply brief; confer with D. Baruch, J. Wollenberg re: same; prepare/revise/finalize supplemental Baruch Declaration; team meeting re: MTD opposition; review USG status report; review MAVNI news.	7.9	\$ 895	\$7,070.50
9/22/2017	St. Romain, Kate	Hold meeting with J. Wollenberg regarding case status; check survey responses; prepare exhibits for the reply to the class certification motion; prepare email to clients regarding preliminary injunction and class certification motion and the weekly status report in the Nio case; review research regarding motion to dismiss standard and Judge Huvelle cases and email E. Woods regarding the same.	4.4	\$ 695	\$3,058.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/22/2017	Wollenberg, Jennifer	Prepare class cert reply brief; emails and discussions with government attorneys, clients, team, and others regarding weekly reporting; review MTD and team discussion re same; emails re client's RFE.	8.5	\$ 975	\$8,287.50
9/22/2017	Woods, Elizabeth	Review defendants' motion to dismiss; conference with team members regarding work assignments for drafting reply to defendants' motion to dismiss; review case law and rules regarding the Federal Rule 12(b)(6) standard of review for motion to dismiss; draft outline of case law and rule findings regarding 12(b)(6) standard of review; review case law authored by J. Huvelle in the District of D.C.	4.7	\$ 520	\$2,444.00
9/23/2017	Raol, Neaha	Review MTD standard/research from E. Woods.	0.4	\$ 895	\$358.00
9/23/2017	Wollenberg, Jennifer	Emails re MTD opposition research.	0.2	\$ 975	\$195.00
9/23/2017	Woods, Elizabeth	Review case law and rules regarding Rule 12(b)(6) Motion to Dismiss standard; review case law regarding which materials a court may consider on a 12(b)(6) motion to dismiss; draft outline of case law and rule findings regarding 12(b)(6) Motion to Dismiss standard and which materials a court may consider in deciding a 12(b)(6) motion; draft and send e-mail to team containing outline with case summaries.	5.6	\$ 520	\$2,912.00
9/24/2017	Baruch, Douglas W.	Address MTD.	1.0	\$ 1,285	\$1,285.00
9/24/2017	Raol, Neaha	Review correspondence from clients, common interest counsel; team correspondence re: MTD; review MTD brief; prior briefing/judge's comments re: final agency action.	1.7	\$ 895	\$1,521.50
9/24/2017	Wollenberg, Jennifer	Emails and discussions re case status and strategy, including with common interest counsel and team.	0.8	\$ 975	\$780.00
9/24/2017	Woods, Elizabeth	Review case law regarding TRAC (Telecom. Research Action Center v. FCC) factors in the context of motions to dismiss; review case law regarding court's obligation, if any, to defer to the government in immigration cases at the motion to dismiss stage; draft outline containing summary of case law and analysis of both TRAC factors and immigration deference in the context of motions to dismiss; draft standard of review section to be used in plaintiffs' opposition to defendants' motion to dismiss.	5.5	\$ 520	\$2,860.00
9/25/2017	Baruch, Douglas W.	Address MTD.	1.0	\$ 1,285	\$1,285.00
9/25/2017	Gates, Shaun	T/c with DOJ regarding weekly status reports.	0.2	\$ 745	\$149.00
9/25/2017	LoBue, Joseph J.	Draft opposition to motion to dismiss.	1.4	\$ 1,180	\$1,652.00
9/25/2017	Raol, Neaha	Call with DOJ and team follow-up; research re: nationwide class standard; confer with J. Wollenberg, J. LoBue re: same and case strategy; confer with E. Woods class cert standard and review findings; review DOJ submission to court; confer with K. St. Romain and review MTD section outline and relevant portions from transcript, order; review docket for MO MAVNI case and complaint.	5.2	\$ 895	\$4,654.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/25/2017	St. Romain, Kate	Draft and respond to emails to/from plaintiff regarding CI interview scheduling; pull prior briefing and language from the complaint about final agency action into outline and prepare emails to N. Raol and J. LoBue regarding final agency action; draft final agency action standard for the opposition to the motion to dismiss; hold telephone call with and prepare email to J. Wollenberg and J. LoBue regarding notice of similar cases and law cited by Defendants filing; ; attend telephone conference with Defense counsel regarding missing information from status reports; email regarding Defendants' report concerning discharged MAVNIs; prepare email to clients regarding hearing in related Kirwa case.	4.5	\$ 695	\$3,127.50
9/25/2017	Wollenberg, Jennifer	Prepare opposition to motion to dismiss; discuss status and strategy; emails with clients and about client issues, including RFE response; call with opposing counsel.	6.9	\$ 975	\$6,727.50
9/25/2017	Woods, Elizabeth	Review case law regarding TRAC (Telecom. Research Action Center v. FCC) factors in the context of motions to dismiss; review case law regarding court's obligation, if any, to defer to the government in immigration cases at the motion to dismiss stage; draft outline containing summary of case law and analysis of both TRAC factors and immigration deference in the context of motions to dismiss; outline draft of standard of review section to be used in plaintiffs' opposition to defendants' motion to dismiss; observe and take notes on call with opposing counsel.	6.1	\$ 520	\$3,172.00
9/26/2017	LoBue, Joseph J.	Draft opposition to motion to dismiss.	6.2	\$ 1,180	\$7,316.00
9/26/2017	St. Romain, Kate	Review article regarding New Jersey "fake" schools; outline differences between the Motion to Dismiss and the Supplemental Opposition to the Preliminary Injunction; draft potential response to MAVNIs who completed the discharge survey; prepare summary of Ahmed v. Holder for J. Wollenberg and E. Woods.	2.3	\$ 695	\$1,598.50
9/26/2017	Wollenberg, Jennifer	Prepare opposition to motion to dismiss; discussions re status and strategy; emails with clients.	5.8	\$ 975	\$5,655.00
9/26/2017	Woods, Elizabeth	Telephone conference with J. Wollenberg regarding draft of opposition to defendants' motion to dismiss; review pleadings, including plaintiffs' first amended complaint and defendants' motion to dismiss; review case law regarding TRAC factors in the context of motions to dismiss; draft argument section regarding TRAC factors in the context of motions to dismiss.	12.2	\$ 520	\$6,344.00
9/27/2017	Baruch, Douglas W.	Address MTD.	1.0	\$ 1,285	\$1,285.00
9/27/2017	Gates, Shaun	Review plaintiff materials for RFE.	0.6	\$ 745	\$447.00
9/27/2017	LoBue, Joseph J.	Draft opposition to motion to dismiss.	5.4	\$ 1,180	\$6,372.00
9/27/2017	Raol, Neaha	Review MAVNI news/recent developments.	0.3	\$ 895	\$268.50
9/27/2017	St. Romain, Kate	Outline opposition to part D of the Motion to Dismiss; hold telephone call and prepare emails to E. Woods regarding opposition to part D of the Motion to Dismiss and case research to refute; review and edit draft of opposition to part D of the Motion to Dismiss.	2.3	\$ 695	\$1,598.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/27/2017	Wollenberg, Jennifer	Work on opposition to motion to dismiss; emails re client's RFE response; emails with client re CI information.	7.5	\$ 975	\$7,312.50
9/27/2017	Woods, Elizabeth	Review case law from the D.C. Circuit and other circuits regarding APA Section 706 in the context of motions to dismiss; review pleadings, including plaintiffs' first amended complaint and defendants' motion to dismiss, to extract relevant material for use in plaintiffs' opposition to defendants' motion to dismiss; compose draft of section of plaintiffs' opposition to defendants' motion to dismiss addressing Part D, APA Section 706 issues; telephone conference with K. St. Romain regarding draft of plaintiffs' opposition; draft introductory section for plaintiffs' opposition to defendants' motion to dismiss.	7.8	\$ 520	\$4,056.00
9/28/2017	Baruch, Douglas W.	Edits and revisions to MTD opposition.	3.0	\$ 1,285	\$3,855.00
9/28/2017	LoBue, Joseph J.	Draft opposition to motion to dismiss.	5.2	\$ 1,180	\$6,136.00
9/28/2017	St. Romain, Kate	Review email from plaintiff regarding case status and coordinate a team call with plaintiff; review draft of the Motion to Dismiss Opposition for the section responding to Defendants' Part D.	0.8	\$ 695	\$556.00
9/28/2017	Wollenberg, Jennifer	Work on opposition to motion to dismiss; emails and work re client's RFE response.	11.5	\$ 975	\$11,212.50
9/28/2017	Woods, Elizabeth	Compose draft of proposed order denying defendants' motion to dismiss; telephone conference with J. Wollenberg regarding standard of review section of plaintiffs' opposition to defendants' motion to dismiss; compose draft of paragraph for insertion into standard of review section of plaintiffs' opposition.	1.9	\$ 520	\$988.00
9/29/2017	Baruch, Douglas W.	Edits and revisions to MTD opposition; confer re strategy.	5.0	\$ 1,285	\$6,425.00
9/29/2017	Gates, Shaun	Review and revise opposition to motion to dismiss for filing.	5.3	\$ 745	\$3,948.50
9/29/2017	Hinnant, H. Coleman	Cite check Nio opposition brief (J. Wollenberg).	6.5	\$ 255	\$1,657.50
9/29/2017	LoBue, Joseph J.	Draft, edit opposition to motion to dismiss.	3.2	\$ 1,180	\$3,776.00
9/29/2017	Raol, Neaha	Review/revise and finalize opposition to MTD; confer with various team members re: same; review DOJ status report.	5.3	\$ 895	\$4,743.50
9/29/2017	St. Romain, Kate	Research form of filing in Nio case and prepare email to J. Wollenberg regarding the same; edit and source/cite check the Opposition to the Motion to Dismiss; prepare table of content and authorities for filing; review and edit proposed order; review Defendants' weekly update; prepare emails to client regarding weekly update and Opposition to the Motion to Dismiss.	3.9	\$ 695	\$2,710.50
9/29/2017	Wollenberg, Jennifer	Prepare and finalize opposition to motion to dismiss; emails re client's RFE response; emails with clients re status and filings.	15.5	\$ 975	\$15,112.50
9/29/2017	Woods, Elizabeth	Review draft of plaintiffs' opposition to defendants' motion to dismiss; review opposition for errors; review and complete edits in the opposition from other members of project team.	3.7	\$ 520	\$1,924.00
9/30/2017	Wollenberg, Jennifer	Emails re client's RFE response.	0.4	\$ 975	\$390.00
10/1/2017	Wollenberg, Jennifer	Emails re client's RFE response.	0.7	\$ 975	\$682.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/2/2017	Baruch, Douglas W.	Address strategy; client calls; address DOJ filings.	2.8	\$ 1,285	\$3,598.00
10/2/2017	Gates, Shaun	Teleconference with common interest counsel; correspondence with J. Wollenberg regarding research for N-426 policy; draft correspondence to DOJ regarding N-426 revocation.	1.6	\$ 745	\$1,192.00
10/2/2017	LoBue, Joseph J.	Meeting with MAVNI team regarding case status and action items; conference call with common interest counsel regarding parallel actions.	1.2	\$ 1,180	\$1,416.00
10/2/2017	St. Romain, Kate	Draft email to survey respondents regarding discharge/contract cancellation information; attend telephone conference with team and plaintiff regarding MAVNI lawsuit update; attend telephone conference with team and common interest counsel regarding updates in Maryland MAVNI case; review email responses from MAVNI clients regarding weekly update;	2.2	\$ 695	\$1,529.00
10/2/2017	Wollenberg, Jennifer	Address MAVNI updates, including call with common interest counsel; call with client re recent issues; emails with clients and others re MAVNI updates; address next steps, including research projects.	4.8	\$ 975	\$4,680.00
10/3/2017	Baruch, Douglas W.	Address correspondence and strategy; client call.	2.5	\$ 1,285	\$3,212.50
10/3/2017	Gates, Shaun	Research regarding history of USCIS's use of Form N-426.	2.2	\$ 745	\$1,639.00
10/3/2017	LoBue, Joseph J.	E-mail exchanges with opposing counsel.	0.4	\$ 1,180	\$472.00
10/3/2017	St. Romain, Kate	Review Law 360 motion to dismiss article; review SDNY decision regarding confidential "national security" information release; prepare emails to survey respondents regarding Defendants' response to Court questions; hold telephone call with J. Wollenberg regarding emails to survey respondent and upcoming tasks; review email to Defense counsel regarding weekly status report errors; attend telephone conference with J. Wollenberg and MAVNI regarding MAVNI litigation questions.	1.9	\$ 695	\$1,320.50
10/3/2017	Wollenberg, Jennifer	Address MAVNI updates, including call with MAVNI; emails with opposing counsel re recent issues; address client's RFE response.	5.5	\$ 975	\$5,362.50
10/4/2017	Baruch, Douglas W.	Address DOJ correspondence re weekly reporting.	0.6	\$ 1,285	\$771.00
10/4/2017	Gates, Shaun	Research regarding Form N-426 use.	1.2	\$ 745	\$894.00
10/4/2017	Raol, Neaha	Follow-up research re: various jurisdiction/immigration-related cases.	1.1	\$ 895	\$984.50
10/4/2017	St. Romain, Kate	Attend telephone conference with plaintiff and J. Wollenberg; review communications between J. Wollenberg and Defense Counsel regarding meet and confer and problems with weekly status report; review Cody case and prepare email to J. Wollenberg and S. Gates regarding selected reserve, ROTC and revocation of N-426.	1.1	\$ 695	\$764.50
10/4/2017	Wollenberg, Jennifer	Call with client re updates; emails with opposing counsel re recent issues, including weekly reporting; address client's RFE response; address MAVNI updates and strategy.	7.5	\$ 975	\$7,312.50
10/5/2017	Baruch, Douglas W.	Address strategy and correspondence with DOJ.	1.0	\$ 1,285	\$1,285.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/5/2017	Gates, Shaun	Research caselaw regarding Form N-426 decertification/revocation.	5.5	\$ 745	\$4,097.50
10/5/2017	Wollenberg, Jennifer	Address client's RFE response; MAVNI updates from clients and others; research re N-426 and other issues; discussions with team re same.	4.5	\$ 975	\$4,387.50
10/6/2017	Baruch, Douglas W.	Correspondence with DOJ; address DOJ filings; confer with team re strategy.	2.5	\$ 1,285	\$3,212.50
10/6/2017	Gates, Shaun	Review court filings in Form N-426 revocation cases.	0.7	\$ 745	\$521.50
10/6/2017	LoBue, Joseph J.	Review Government weekly report; review Government Reply brief; meeting with MAVNI team regarding case status and action items.	2.1	\$ 1,180	\$2,478.00
10/6/2017	Raol, Neaha	Review DOJ weekly status report, MTD reply brief, correspondence with DOJ; review immigration adjudication cases and research/pull briefs re: same; confer with J. Wollenberg re: same; follow-up re: transcript request.	4.1	\$ 895	\$3,669.50
10/6/2017	St. Romain, Kate	Prepare emails to clients regarding weekly status report and Defendants' motion to dismiss reply brief; analyze weekly status report and Defendants' motion to dismiss reply brief.	1.0	\$ 695	\$695.00
10/6/2017	Wollenberg, Jennifer	Emails/discussions with team members, opposing counsel, and clients regarding weekly reporting and MTD reply brief; emails with common interest counsel re MAVNI case; preparation re next steps.	5.5	\$ 975	\$5,362.50
10/7/2017	Wollenberg, Jennifer	Emails with clients, K. Grisez, and common interest counsel re recent filings.	0.5	\$ 975	\$487.50
10/8/2017	Wollenberg, Jennifer	Emails with common interest counsel regarding MAVNI updates; emails with clients.	0.5	\$ 975	\$487.50
10/9/2017	LoBue, Joseph J.	Meeting with team regarding status and action items; review DOD regulations and policies regarding characterization of discharges.	1.8	\$ 1,180	\$2,124.00
10/9/2017	Raol, Neaha	Team meeting.	0.2	\$ 895	\$179.00
10/9/2017	Wollenberg, Jennifer	Call re MAVNI cases; emails with common interest counsel; discuss matter with D. Baruch, J. Lobue, S. Gates, and K. Grisez; review N-426 background/cases; research.	5.5	\$ 975	\$5,362.50
10/10/2017	Baruch, Douglas W.	Meet and confer with DOJ; follow-up email re questions.	1.7	\$ 1,285	\$2,184.50
10/10/2017	LoBue, Joseph J.	Meeting and conference call with opposing counsel; meeting with team regarding case status.	0.8	\$ 1,180	\$944.00
10/10/2017	Raol, Neaha	Meet and confer with DOJ; follow-up team discussion re next steps; review follow-up correspondence with DOJ; correspondence from common interest counsel/common interest counsel re: DTP extension.	1.2	\$ 895	\$1,074.00
10/10/2017	St. Romain, Kate	Attend telephone meet and confer and pre-conference team meeting regarding continued delays to naturalization adjudication; review email to defendants regarding meet and confer questions.	0.5	\$ 695	\$347.50
10/10/2017	Wollenberg, Jennifer	Emails and discussions with opposing counsel; address updates re MAVNIs.	1.4	\$ 975	\$1,365.00
10/11/2017	Wollenberg, Jennifer	Address MAVNI updates and emails with clients/others.	0.9	\$ 975	\$877.50
10/12/2017	Raol, Neaha	Review material from common interest counsel.	0.2	\$ 895	\$179.00
10/12/2017	Wollenberg, Jennifer	Address MAVNI updates and emails/calls with clients/others.	2.1	\$ 975	\$2,047.50
10/13/2017	Raol, Neaha	Review weekly update, new DOD N-426 policy and related DoD statements/comments; confer with various team members re: same.	1.1	\$ 895	\$984.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
10/13/2017	St. Romain, Kate	Analyze weekly status report and new N-426 policy; email clients regarding weekly status update and briefs filed in Kirwa action.	0.3	\$ 695	\$208.50
10/13/2017	Wollenberg, Jennifer	Address MAVNI updates, including discussions with clients and others.	2.2	\$ 975	\$2,145.00
10/16/2017	Baruch, Douglas W.	Motion in response to new policy.	1.5	\$ 1,285	\$1,927.50
10/16/2017	Wollenberg, Jennifer	Calls and emails with client re MAVNI updates; notice to the court requesting status conference and briefing schedule; emails with common interest counsel regarding MAVNI cases.	1.3	\$ 975	\$1,267.50
10/17/2017	St. Romain, Kate	Preparation of documents for status conference; draft emails to clients regarding filing in Kirwa case and follow-up questions; attend team meeting to discussion status conference.	0.5	\$ 695	\$347.50
10/18/2017	Baruch, Douglas W.	Status conference hearing and follow up; address new filings.	4.5	\$ 1,285	\$5,782.50
10/18/2017	St. Romain, Kate	Attend status hearing for renewal of preliminary injunction; attend team meeting regarding supplemental briefing for class certification motion, renewed preliminary injunction and second amended complaint; legislative history research telephone call with S. Orsini; review certification required by Nationality Act of 1940; draft email for J. Wollenberg to clients regarding preliminary injunction and status hearing.	3.0	\$ 695	\$2,085.00
10/18/2017	Wollenberg, Jennifer	Prepare for and attend hearing; discuss and prepare filings due on Friday.	8.0	\$ 975	\$7,800.00
10/18/2017	Woods, Elizabeth	Observe hearing and take notes; conference with project team regarding next steps and research.	4.6	\$ 520	\$2,392.00
10/19/2017	Baruch, Douglas W.	Drafting amended complaint and PI brief; meetings and strategy re same.	10.0	\$ 1,285	\$12,850.00
10/19/2017	Gates, Shaun	Draft filing addressing N-426 issue; research local rules addressing TROs; legislative history research regarding naturalization through military service.	12.4	\$ 745	\$9,238.00
10/19/2017	LoBue, Joseph J.	Draft supplemental brief in support of preliminary injunction motion.	9.9	\$ 1,180	\$11,682.00
10/19/2017	Raol, Neaha	Correspondence with MAVNIs; research re: provisional class cert; confer re: due process claims; review/revise amended class cert memo; confer with J. Wollenberg re: same; review TRO rules; confer with B. McNamara.	5.1	\$ 895	\$4,564.50
10/19/2017	St. Romain, Kate	Prepare emails to clients regarding status hearing and preliminary injunction hearing in Kirwa; hold telephone conferences with and email S. Orsini regarding legislative history for INA 329 certification requirement and prepare email of background materials; prepare email to plaintiff regarding immigration status; coordinate collection of cases for J. Wollenberg; draft renewed preliminary injunction motion.	2.5	\$ 695	\$1,737.50
10/19/2017	Wollenberg, Jennifer	Prepare filings due tomorrow; discussions with clients and common interest individuals; team discussions re tomorrow's filings.	12.2	\$ 975	\$11,895.00
10/19/2017	Woods, Elizabeth	Review case law regarding retroactive applicability of administrative rules; draft portion of renewed motion for preliminary injunction addressing retroactive applicability of administrative rules.	7.1	\$ 520	\$3,692.00
10/20/2017	Baruch, Douglas W.	Finalize amended complaint and PI brief; team meeting; confer with common interest counsel; legal research; address DOJ filing.	6.0	\$ 1,285	\$7,710.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/20/2017	Beary, Webster	Team meeting.	0.7	\$ 815	\$570.50
10/20/2017	Gates, Shaun	Prepare filings re N-426 issue; team meeting to discuss status of matter; teleconference with common interest counsel.	6.6	\$ 745	\$4,917.00
10/20/2017	Hinnant, H. Coleman	Cite check case law and statutes in Nio motions for class certification and preliminary injunction (J. Wollenberg).	3.5	\$ 255	\$892.50
10/20/2017	LoBue, Joseph J.	Review, edit second amended complaint; review, edit amended class certification motion; draft, edit supplemental brief in support of preliminary injunction motion.	7.6	\$ 1,180	\$8,968.00
10/20/2017	Raol, Neaha	Review/revise various filings (amended complaint, amended PI motion, amended class cert motion) and finalize/file; various conferences with team members re: same; team meeting re: status and next steps; review status report.	5.5	\$ 895	\$4,922.50
10/20/2017	St. Romain, Kate	Draft and edit proposed order for renewed preliminary injunction motion; edit amended motion and memorandum for class certification and check citations and factual references; draft and edit the proposed order for the amended motion for class certification; prepare emails to client regarding second amended complaint, amended class certification and renewed preliminary injunction and weekly reporting; edit renewed motion for preliminary injunction and check and supplement citations and factual references; pull transcript references to unmitigable derogatory information; edit motion for renewed preliminary injunction; prepare exhibit for renewed preliminary injunction; attend team meeting to debrief regarding filings and discuss upcoming briefs; prepare email to N. Raol regarding model language for MAVNI contacts; email non-client MAVNIs regarding second amended complaint, amended class certification and renewed preliminary injunction.	7.1	\$ 695	\$4,934.50
10/20/2017	Wollenberg, Jennifer	Address and finalize filings due today; emails/discussions with team, clients, common interest individuals, and others re MAVNI updates and issues.	15.5	\$ 975	\$15,112.50
10/20/2017	Woods, Elizabeth	Conference with project team regarding future research and next steps; review defendants' weekly progress report.	1.4	\$ 520	\$728.00
10/21/2017	Wollenberg, Jennifer	Emails with clients re updates.	0.5	\$ 975	\$487.50
10/22/2017	Baruch, Douglas W.	Address pending motions and common interest counsel emails.	1.0	\$ 1,285	\$1,285.00
10/22/2017	Wollenberg, Jennifer	Email from client re updates.	0.2	\$ 975	\$195.00
10/23/2017	Baruch, Douglas W.	Research re new claims; address strategy; confer with team.	3.0	\$ 1,285	\$3,855.00
10/23/2017	Beary, Webster	Research DC Circuit caselaw regarding discovery in APA cases.	3.9	\$ 815	\$3,178.50
10/23/2017	LoBue, Joseph J.	Review hearing transcripts; review legal research for supplemental brief.	7.8	\$ 1,180	\$9,204.00
10/23/2017	St. Romain, Kate	Hold telephone call with J. Wollenberg regarding outstanding tasks and legislative history; analyze Court order regarding unmitigable information requirements.	0.5	\$ 695	\$347.50
10/23/2017	Wollenberg, Jennifer	Research and preparation re this week's filings and hearing; communications with team, clients, and common interest lawyers re MAVNI updates.	8.5	\$ 975	\$8,287.50
10/24/2017	Baruch, Douglas W.	Address PI opposition, team meeting, strategy, research.	3.8	\$ 1,285	\$4,883.00

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10/24/2017	Beary, Webster	Team meeting; research DC Circuit caselaw regarding discovery in APA cases and send findings to J. LoBue.	2.8	\$ 815	\$2,282.00
10/24/2017	Gates, Shaun	Team meeting; drafting revised PI.	4.9	\$ 745	\$3,650.50
10/24/2017	LoBue, Joseph J.	Review government opposition to preliminary injunction motion; review opposition to class certification motion; draft reply brief in support of preliminary injunction.	7.8	\$ 1,180	\$9,204.00
10/24/2017	Raol, Neaha	Review government's opposition briefs (class cert and PI); team meeting.	0.7	\$ 895	\$626.50
10/24/2017	St. Romain, Kate	Analyze Defendants' supplemental preliminary injunction opposition and amended class certification opposition; analyze Practice Alert- The Department of Defense Halts Expedited Naturalization of Military Members; attend team meeting regarding Defendants' supplemental preliminary injunction opposition and email team assignments; prepare emails to clients regarding Defendants' supplemental preliminary injunction opposition and amended class certification opposition.	1.8	\$ 695	\$1,251.00
10/24/2017	Wollenberg, Jennifer	Research re legislative history; review Government's filings and team meeting re the same; prepare this week's filings and for upcoming hearing; communications with clients and others.	6.7	\$ 975	\$6,532.50
10/24/2017	Woods, Elizabeth	Review defendants' opposition to plaintiffs' renewed motion for preliminary injunction/motion for temporary restraining order.	0.2	\$ 520	\$104.00
10/25/2017	Baruch, Douglas W.	Address PI reply brief.	4.0	\$ 1,285	\$5,140.00
10/25/2017	Gates, Shaun	Drafting PI papers.	2.1	\$ 745	\$1,564.50
10/25/2017	LoBue, Joseph J.	Draft reply brief in support of preliminary injunction motion; review court's decision in Kirwa case.	7.9	\$ 1,180	\$9,322.00
10/25/2017	Raol, Neaha	Identify and save potential exhibits (USCIS docs/sites); confer with K. St. Romain; review media reports/public info; review email from clerk re: upcoming hearing; review correspondence/update from common interest counsel.	1.0	\$ 895	\$895.00
10/25/2017	St. Romain, Kate	Review and respond to emails from clients; email potential class members; collection of filings in Sudario v. DHS and review; respond to client emails regarding the preliminary injunction hearing; prepare email to J. LoBue regarding USCIS policy manual; email S. Orsini regarding 8 USC 1440 legislative history; draft footnote refuting that MAVNIs have not served and identify Defendant filings and transcript where MAVNI service is referenced; research public interest served by implementing congressional intent and draft footnote regarding public interest; email clients regarding order and opinion granting Preliminary Injunction in Kirwa.	3.6	\$ 695	\$2,502.00
10/25/2017	Wollenberg, Jennifer	Review Court's order in Kirwa and discussions re the same; prepare reply brief and discussions re the same.	14.7	\$ 975	\$14,332.50
10/26/2017	Baruch, Douglas W.	Finalize reply brief; prepare for hearing.	5.5	\$ 1,285	\$7,067.50
10/26/2017	Gates, Shaun	Drafting preliminary injunction brief.	2.9	\$ 745	\$2,160.50
10/26/2017	Hinnant, H. Coleman	Cite check case law and statutes cited in Nio reply memo (J. Wollenberg).	1.5	\$ 255	\$382.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/26/2017	LoBue, Joseph J.	Draft reply brief in support of preliminary injunction motion; prepare for preliminary injunction hearing.	8.1	\$ 1,180	\$9,558.00
10/26/2017	Raol, Neaha	Revise reply brief; review hearing transcripts from prior week's hearings; various conferences with team re: same; prepare/review courtesy copies for court; team meeting re: upcoming hearing prep; review govt's declaration submitted to court; review/draft framework for due process claim and preliminary research re: same; confer with J. Wollenberg re: same; other hearing prep for PI and class cert motion as needed.	7.8	\$ 895	\$6,981.00
10/26/2017	St. Romain, Kate	Attend team meeting to prepare for Nio class certification and preliminary injunction hearing; revise/edit preliminary injunction reply.	3.4	\$ 695	\$2,363.00
10/26/2017	Wollenberg, Jennifer	Prepare and finalize reply brief; prepare for tomorrow's hearing; communications with MAVNIs, team, and others re same.	15.0	\$ 975	\$14,625.00
10/27/2017	Baruch, Douglas W.	Address court hearing on injunction and follow up.	4.5	\$ 1,285	\$5,782.50
10/27/2017	Raol, Neaha	Prep for and attend PI and class certification hearing; review DOJ filing/weekly status report; team meeting re: next steps; review orders and opinion issued by court; follow-up re: transcript request; confer with various team members, including J. Wollenberg, K. St. Romain.	6.8	\$ 895	\$6,086.00
10/27/2017	St. Romain, Kate	Attend preliminary injunction and class certification hearing; attend team meeting regarding follow-up from preliminary injunction and class certification hearing results; prepare email to team regarding outstanding tasks; prepare email to clients, common interest counsel regarding hearing, preliminary injunction decision and class action decision; review class action opinion and order; review Washington Post article regarding preliminary injunction motion.	6.5	\$ 695	\$4,517.50
10/27/2017	Wollenberg, Jennifer	Prepare for and attend hearing; address follow-up from hearing, including communications with clients and others.	7.5	\$ 975	\$7,312.50
10/28/2017	Wollenberg, Jennifer	Address inquiries; emails with MAVNIs re yesterday's hearing/preliminary injunction.	1.0	\$ 975	\$975.00
10/29/2017	St. Romain, Kate	Draft email to MAVNI asking about joining lawsuit; prepare email to team with content for MAVNI class action website.	1.2	\$ 695	\$834.00
10/29/2017	Woods, Elizabeth	Review case law regarding demand for class action member information in APA cases; draft and transmit research findings to team.	6.4	\$ 520	\$3,328.00
10/30/2017	LoBue, Joseph J.	Review legal research for APA discovery.	1.8	\$ 1,180	\$2,124.00
10/30/2017	Raol, Neaha	Research re: due process claim case law in anticipation for MTD opposition; confer with D. Baruch, J. Wollenberg re: same; review website draft material/language; confer with K. St. Romain re: same.	3.4	\$ 895	\$3,043.00
10/30/2017	Wollenberg, Jennifer	Address updates and other issues, including communications with clients and team.	5.5	\$ 975	\$5,362.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/30/2017	Woods, Elizabeth	Review case law and statutory provisions regarding a district court's jurisdiction after a preliminary injunction has been appealed; prepare draft of research findings for review by supervising attorneys.	4.3	\$ 520	\$2,236.00
10/31/2017	LoBue, Joseph J.	Review legal research for APA discovery and class discovery.	2.4	\$ 1,180	\$2,832.00
10/31/2017	Raol, Neaha	Review website update/language; confer with K. St. Romain/J. Wollenberg re: same; due process claim research; confer with S. Orsini re: same and review secondary sources from S. Orsini; review Nio 10/28 hearing transcript and media reports re: same; review correspondence from potential class member.	3.8	\$ 895	\$3,401.00
10/31/2017	St. Romain, Kate	Draft new website tabs for Nio important dates; hold telephone call with MAVNI with naturalization hold and email MAVNI; address client emails.	0.4	\$ 695	\$278.00
11/1/2017	McNamara, Brendan	Conduct preliminary research on class actions for N. Raol.	1.0	\$ 295	\$295.00
11/1/2017	Wollenberg, Jennifer	Address emails/inquiries/updates from MAVNIs and interested parties.	3.8	\$ 975	\$3,705.00
11/2/2017	McNamara, Brendan	Conduct legal research for J. Wollenberg on whether named plaintiffs who have received relief in class actions can continue to represent the class.	5.6	\$ 295	\$1,652.00
11/2/2017	Raol, Neaha	Conference with various MAVNIs and review correspondence from same re: updates/documents/info; confer with J. Wollenberg re: same.	0.9	\$ 895	\$805.50
11/2/2017	St. Romain, Kate	Prepare email to MAVNI regarding Nio class action questions.	0.2	\$ 695	\$139.00
11/2/2017	Wollenberg, Jennifer	Address website; emails and calls with clients, class member MAVNIs, and others, including re N-426 requirements for Nio class members.	4.4	\$ 975	\$4,290.00
11/3/2017	Wollenberg, Jennifer	Review weekly update report and email to team re same.	0.4	\$ 975	\$390.00
11/4/2017	St. Romain, Kate	Prepare emails to clients regarding weekly status report and Amended Complaint and Class Certification filings in the Kirwa case.	0.3	\$ 695	\$208.50
11/4/2017	Wollenberg, Jennifer	Emails to individual clients and class members re status/updates.	0.5	\$ 975	\$487.50
11/5/2017	Wollenberg, Jennifer	Various MAVNI update emails -- from clients, MAVNIs, and others.	1.0	\$ 975	\$975.00
11/6/2017	LoBue, Joseph J.	Meeting with J. Wollenberg regarding case status and action items.	0.9	\$ 1,180	\$1,062.00
11/6/2017	Raol, Neaha	Confer with MAVNI class member, J. Wollenberg, K. St. Romain; review Government solicitation re: MAVNI and research/follow-up re: same.	1.3	\$ 895	\$1,163.50
11/6/2017	St. Romain, Kate	Attend telephone conference with J. Wollenberg and MAVNI soldiers regarding current naturalization process and case updates; edit language for the MAVNI website and coordinate updates to the MAVNI website.	1.9	\$ 695	\$1,320.50
11/6/2017	Wollenberg, Jennifer	Discussions with MAVNIs, common interest attorneys, and team members re updates and status.	2.6	\$ 975	\$2,535.00
11/7/2017	Baruch, Douglas W.	Address status; meeting with common interest counsel.	1.2	\$ 1,285	\$1,542.00
11/7/2017	Gates, Shaun	Meeting with common interest counsel.	0.8	\$ 745	\$596.00
11/7/2017	LoBue, Joseph J.	Meeting with common interest counsel regarding case status and strategy; meeting with team regarding case status and action items; review legal research on discovery in APA cases.	2.6	\$ 1,180	\$3,068.00
11/7/2017	Raol, Neaha	Follow-up re: Government solicitation; confer with team, common interest counsel.	0.9	\$ 895	\$805.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/7/2017	Wollenberg, Jennifer	Emails with MAVNIs and common interest attorneys re MAVNI issues and updates; prep for call with immigration counsel; calls with MAVNIs; meeting with common interest counsel.	5.1	\$ 975	\$4,972.50
11/8/2017	Baruch, Douglas W.	Meetings and calls re strategy and status.	2.5	\$ 1,285	\$3,212.50
11/8/2017	Beary, Webster	Team meeting; research APA discovery rules in DC Circuit.	2.5	\$ 815	\$2,037.50
11/8/2017	Gates, Shaun	Team meeting.	1.1	\$ 745	\$819.50
11/8/2017	LoBue, Joseph J.	Review legal research on discovery and administrative record issues; draft submission on eligibility for naturalization based on uncharacterized discharges; meeting with common interest counsel; conference call with common interest counsel.	3.1	\$ 1,180	\$3,658.00
11/8/2017	Raol, Neaha	Team conference re: discovery, administrative record and status/upcoming deadlines; review article re: MAVNI; review email from MAVNI; confer with J. Wollenberg, W. Beary, K. St. Romain re: research.	1.4	\$ 895	\$1,253.00
11/8/2017	St. Romain, Kate	Research enforcement of preliminary injunction orders; prepare email regarding enforcement of preliminary injunction orders; attend team meeting; review research by E. Woods; review emails with clients.	1.9	\$ 695	\$1,320.50
11/8/2017	Wollenberg, Jennifer	Discussions with clients, MAVNIs, and common interest attorneys regarding status, strategy, and/or updates; team meeting; discuss matter with immigration counsel.	4.7	\$ 975	\$4,582.50
11/8/2017	Woods, Elizabeth	Telephone conference regarding discovery research and next steps; research dockets in District for the District of Columbia regarding discovery precedent.	1.4	\$ 520	\$728.00
11/9/2017	Beary, Webster	Research discovery rules in APA cases in DC Circuit; review MAVNI record to understand possible sources of discovery.	5.5	\$ 815	\$4,482.50
11/9/2017	St. Romain, Kate	Review weekly status report and prepare emails to clients regarding weekly status report.	0.2	\$ 695	\$139.00
11/9/2017	Wollenberg, Jennifer	Address updates and status with MAVNIs and common interest attorneys.	4.6	\$ 975	\$4,485.00
11/10/2017	Beary, Webster	Research rules pertaining to discovery in APA cases.	6.0	\$ 815	\$4,890.00
11/10/2017	LoBue, Joseph J.	Draft submission on eligibility for naturalization based on uncharacterized discharge.	2.2	\$ 1,180	\$2,596.00
11/10/2017	Raol, Neaha	Follow-up re: solicitation; confer with team, common interest counsel.	0.2	\$ 895	\$179.00
11/10/2017	St. Romain, Kate	Attend telephone conference with J. Wollenberg and K. Grisez regarding immigration program and summary of MAVNI cases.	0.2	\$ 695	\$139.00
11/10/2017	Wollenberg, Jennifer	Emails with MAVNIs and common interest lawyers regarding MAVNIs issues and updates; address inquiry.	2.1	\$ 975	\$2,047.50
11/11/2017	Wollenberg, Jennifer	Emails from common interest counsel, common interest counsel, and others re MAVNI updates and issues.	1.0	\$ 975	\$975.00
11/12/2017	Beary, Webster	Research rules pertaining to discovery in APA cases.	5.4	\$ 815	\$4,401.00
11/12/2017	Raol, Neaha	Review discovery research.	0.4	\$ 895	\$358.00
11/12/2017	Wollenberg, Jennifer	Emails with client and emails with common interest counsel re MAVNI issues and updates.	1.0	\$ 975	\$975.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
11/13/2017	LoBue, Joseph J.	Review legal research regarding discovery/administrative record issues; draft submission for naturalization based on uncharacterized discharges.	3.7	\$ 1,180	\$4,366.00
11/13/2017	St. Romain, Kate	Draft lawsuit description for the immigration lawyers; review recent publications regarding MAVNI program and litigation.	1.0	\$ 695	\$695.00
11/13/2017	Wollenberg, Jennifer	Address updates and issues re MAVNIs, including discussions re same.	3.8	\$ 975	\$3,705.00
11/14/2017	Baruch, Douglas W.	Motion to enforce drafting and revisions.	3.0	\$ 1,285	\$3,855.00
11/14/2017	Beary, Webster	Discuss APA discovery research with J. Wollenberg.	0.2	\$ 815	\$163.00
11/14/2017	St. Romain, Kate	Hold telephone call with W. Beary regarding discovery research; review discovery research from W. Beary; draft response to MAVNI soldiers regarding class action status.	0.5	\$ 695	\$347.50
11/14/2017	Wollenberg, Jennifer	Emails and calls re updates and issues re MAVNIs.	1.0	\$ 975	\$975.00
11/15/2017	St. Romain, Kate	Draft email to plaintiff; review naturalization updates from MAVNI soldiers.	0.2	\$ 695	\$139.00
11/16/2017	Wollenberg, Jennifer	Address issues and updates re MAVNIs, including emails/calls with MAVNIs and common interest lawyers.	3.5	\$ 975	\$3,412.50
11/17/2017	Baruch, Douglas W.	Address weekly status report.	0.4	\$ 1,285	\$514.00
11/17/2017	Gates, Shaun	Review correspondence from J. Wollenberg regarding updates from class members.	0.2	\$ 745	\$149.00
11/17/2017	LoBue, Joseph J.	Review Government Motion to Dismiss and supporting materials.	1.2	\$ 1,180	\$1,416.00
11/17/2017	Raol, Neaha	Review news and testimony/transcript of Army GC appointee; research/review due process material in anticipation of MTD opp; review weekly status report and motion to dismiss filed by defendants; confer with D. Baruch re: same.	4.6	\$ 895	\$4,117.00
11/17/2017	St. Romain, Kate	Address motion to dismiss cases; review weekly status update.	0.2	\$ 695	\$139.00
11/17/2017	Wollenberg, Jennifer	Emails from MAVNIs, common interest counsel, et al. regarding status and updates; review defense filings; emails with K. Grisez re client situation.	4.5	\$ 975	\$4,387.50
11/18/2017	Wollenberg, Jennifer	Emails with common interest counsel and others re MAVNI status, updates, and issues; emails with team members re motion to dismiss response.	1.2	\$ 975	\$1,170.00
11/19/2017	Baruch, Douglas W.	Review MTD.	1.0	\$ 1,285	\$1,285.00
11/19/2017	St. Romain, Kate	Prepare email to team regarding Motion to Dismiss cases; email J. Wollenberg regarding client emails.	0.3	\$ 695	\$208.50
11/19/2017	Wollenberg, Jennifer	Emails with client and other attorneys regarding status issues; emails re government motion to dismiss and next steps.	1.1	\$ 975	\$1,072.50
11/20/2017	Baruch, Douglas W.	Address motion for summary judgment.	2.0	\$ 1,285	\$2,570.00
11/20/2017	Beary, Webster	Team meeting to discuss response to DOJ filings; research what a court can rely on during summary judgment in an APA case.	3.0	\$ 815	\$2,445.00
11/20/2017	Gates, Shaun	Address motion to dismiss arguments.	2.2	\$ 745	\$1,639.00
11/20/2017	McNamara, Brendan	Conduct legal research and read briefs related to APA 552 and 553 arguments for summary judgment motion.	7.8	\$ 295	\$2,301.00
11/20/2017	Raol, Neaha	Follow-up re: solicitation; confer with team, common interest counsel.	1.5	\$ 895	\$1,342.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
11/20/2017	St. Romain, Kate	Email clients regarding Kirwa and Nio motions to dismiss and weekly status report; analyze motion to dismiss; attend team meeting regarding motion to dismiss; coordinate the addition of motion to dismiss document to MAVNI website; email common interest counsel regarding weekly status report and motions to dismiss; email J. Wollenberg regarding individual MAVNI emails.	2.3	\$ 695	\$1,598.50
11/20/2017	Wollenberg, Jennifer	Address updates and issues re MAVNIs; team meeting re motion to dismiss and other issues; review materials re the same; call with common interest counsel.	4.8	\$ 975	\$4,680.00
11/20/2017	Woods, Elizabeth	Conference with matter team regarding preparing reply to Kirwa and Nio motions to dismiss; review AILA Immigration Handbook and relevant immigration cases contained therein.	2.3	\$ 520	\$1,196.00
11/21/2017	Baruch, Douglas W.	Address motion to dismiss.	1.2	\$ 1,285	\$1,542.00
11/21/2017	Gates, Shaun	Address motion to dismiss arguments; research regarding the same.	2.7	\$ 745	\$2,011.50
11/21/2017	McNamara, Brendan	Conduct legal research and read briefs related to APA 552 and 553 arguments for summary judgment motion; meet with J. LoBue and draft Section 552 argument for summary judgment motion.	7.6	\$ 295	\$2,242.00
11/21/2017	Raol, Neaha	MTD Opposition argument/review of relevant points/notes.	3.0	\$ 895	\$2,685.00
11/21/2017	St. Romain, Kate	Research case for J. Wollenberg; research available APA relief; research mandamus relief available; preparation of research materials.	0.9	\$ 695	\$625.50
11/21/2017	Wollenberg, Jennifer	Emails with MAVNIs and others re updates and issues; review potential administrative record/discovery issues and emails with team members re the same; review research re motion to dismiss and summary judgment.	1.9	\$ 975	\$1,852.50
11/21/2017	Woods, Elizabeth	Review AILA Immigration Handbook; review immigration cases referenced in handbook; prepare summaries of immigration cases.	2.5	\$ 520	\$1,300.00
11/22/2017	Baruch, Douglas W.	Address motion.	1.5	\$ 1,285	\$1,927.50
11/22/2017	McNamara, Brendan	Conduct legal research, read case law, and draft Section 552 argument for summary judgment motion.	2.6	\$ 295	\$767.00
11/22/2017	Wollenberg, Jennifer	Emails and updates regarding MAVNI issues, including emails from common interest counsel and clients; address motion to dismiss and related materials.	1.2	\$ 975	\$1,170.00
11/23/2017	Wollenberg, Jennifer	Emails re MAVNI updates and issues.	1.5	\$ 975	\$1,462.50
11/24/2017	Gates, Shaun	Drafting opposition to motion to dismiss.	4.8	\$ 745	\$3,576.00
11/24/2017	Wollenberg, Jennifer	Emails re MAVNI updates and issues.	1.2	\$ 975	\$1,170.00
11/25/2017	Gates, Shaun	Drafting opposition to motion to dismiss.	5.0	\$ 745	\$3,725.00
11/25/2017	St. Romain, Kate	Prepare emails to clients regarding November 24, 2017 weekly status report.	0.2	\$ 695	\$139.00
11/26/2017	McNamara, Brendan	Finalize draft of Section 552 argument for summary judgment motion and draft Section 553 argument.	3.6	\$ 295	\$1,062.00
11/26/2017	Raol, Neaha	Review emails/analysis/information from common interest counsel.	0.5	\$ 895	\$447.50
11/26/2017	Wollenberg, Jennifer	Emails re MAVNI updates and issues.	2.0	\$ 975	\$1,950.00
11/27/2017	Baruch, Douglas W.	Address response to MTD.	2.5	\$ 1,285	\$3,212.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/27/2017	Beary, Webster	Draft summary judgment argument; team meeting.	8.7	\$ 815	\$7,090.50
11/27/2017	LoBue, Joseph J.	Draft outline for opposition to motion to dismiss.	1.5	\$ 1,180	\$1,770.00
11/27/2017	McNamara, Brendan	Finalize draft of Section 552 and 553 claims for summary judgment brief.	5.5	\$ 295	\$1,622.50
11/27/2017	Raol, Neaha	Draft MTD opposition/research re: same.	1.4	\$ 895	\$1,253.00
11/27/2017	Wollenberg, Jennifer	Status updates and communications with MAVNIs and others re issues and concerns.	1.8	\$ 975	\$1,755.00
11/28/2017	Baruch, Douglas W.	Address MTD.	2.5	\$ 1,285	\$3,212.50
11/28/2017	Beary, Webster	Team meeting; phone conference with DOJ; research rules on what evidence can be relied on in SJ motion in APA case.	2.5	\$ 815	\$2,037.50
11/28/2017	McNamara, Brendan	Participate in MAVNI conference call with opposing counsel and meeting following call.	1.7	\$ 295	\$501.50
11/28/2017	Raol, Neaha	MTD Opposition - re: constitutional law claims; confer/emails with MAVNI class members.	3.3	\$ 895	\$2,953.50
11/28/2017	Wollenberg, Jennifer	Prepare MTD opposition; communications with MAVNIs and others re updates and concerns/issues.	3.8	\$ 975	\$3,705.00
11/29/2017	Baruch, Douglas W.	Address MTD.	2.5	\$ 1,285	\$3,212.50
11/29/2017	Beary, Webster	Research caselaw on what constitutes the administrative record in APA cases.	0.5	\$ 815	\$407.50
11/29/2017	McNamara, Brendan	Review transcripts, declarations, affidavits and other court documents related to timing for background checks and processing naturalization applications; prepare outline of relevant facts.	6.8	\$ 295	\$2,006.00
11/29/2017	Raol, Neaha	Draft MTD opposition.	3.8	\$ 895	\$3,401.00
11/29/2017	Wollenberg, Jennifer	Prepare MTD opposition; communications with MAVNIs and others re updates and concerns/issues.	2.2	\$ 975	\$2,145.00
11/30/2017	Baruch, Douglas W.	Address MTD opposition.	4.5	\$ 1,285	\$5,782.50
11/30/2017	Beary, Webster	Draft standard of review section for motion to dismiss; discuss with J. Wollenberg.	2.4	\$ 815	\$1,956.00
11/30/2017	Gates, Shaun	Draft opposition to motion to dismiss.	0.7	\$ 745	\$521.50
11/30/2017	LoBue, Joseph J.	Draft opposition to motion to dismiss.	4.6	\$ 1,180	\$5,428.00
11/30/2017	McNamara, Brendan	Prepare outline of relevant facts related to timing issues for background checks and processing applications; prepare table summarizing weekly status reports.	7.5	\$ 295	\$2,212.50
11/30/2017	Raol, Neaha	Confer with MAVNI/nio class member; draft/revise MTD opposition and confer with various team members re: same.	7.4	\$ 895	\$6,623.00
11/30/2017	St. Romain, Kate	Edit motion to dismiss proposed order; edit Motion to Dismiss opposition constitutional violation section; edit partial motion to dismiss opposition APA claims section.	1.2	\$ 695	\$834.00
11/30/2017	Wollenberg, Jennifer	Prepare MTD opposition; communications with MAVNIs and others re updates and concerns/issues.	4.4	\$ 975	\$4,290.00
12/1/2017	Baruch, Douglas W.	Edits and revisions to MTD opposition.	5.0	\$ 1,285	\$6,425.00
12/1/2017	Beary, Webster	Edit opposition motion and discuss edits with J. Wollenberg; conduct final review prior to submission.	6.0	\$ 815	\$4,890.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
12/1/2017	Gates, Shaun	Prepare response to motion to dismiss for filing.	2.6	\$ 745	\$1,937.00
12/1/2017	Hinnant, H. Coleman	Cite check case law cited in Nio brief in opposition to motion to dismiss (J. Wollenberg).	2.5	\$ 255	\$637.50
12/1/2017	LoBue, Joseph J.	Draft, edit opposition to motion to dismiss; review legal research.	3.9	\$ 1,180	\$4,602.00
12/1/2017	McNamara, Brendan	Research case law about compliance with particular rule and draft summary of analysis for J. Wollenberg.	6.2	\$ 295	\$1,829.00
12/1/2017	Raol, Neaha	Review DOJ status filing; review/revise MTD opposition; confer with K. St. Romain re: same.	2.2	\$ 895	\$1,969.00
12/1/2017	St. Romain, Kate	Edit Motion to Dismiss; hold telephone calls with J. Wollenberg regarding motion to dismiss content.	1.7	\$ 695	\$1,181.50
12/1/2017	Wollenberg, Jennifer	Prepare, finalize, and file opposition to motion to dismiss; emails with team and others re filing and updates/issues.	9.5	\$ 975	\$9,262.50
12/4/2017	Baruch, Douglas W.	Address research re administrative record and strategy re reporting updates; meetings.	4.0	\$ 1,285	\$5,140.00
12/4/2017	Gates, Shaun	MAVNI team meeting to discuss status of matter; review Nio enlistment documents.	1.4	\$ 745	\$1,043.00
12/4/2017	McNamara, Brendan	Meet with MAVNI team to discuss strategy and assignments; research re rule violations; draft section of brief.	8.6	\$ 295	\$2,537.00
12/4/2017	Raol, Neaha	Review DOJ MTD reply brief; prep courtesy copies for court; team meeting.	2.0	\$ 895	\$1,790.00
12/4/2017	St. Romain, Kate	Email clients regarding litigation update; attend team meeting regarding the motion to dismiss, motion to expand reporting requirement, and dealing with the administrative record deadlines.	1.3	\$ 695	\$903.50
12/4/2017	Wollenberg, Jennifer	Emails re updates/issues with class members; team meeting.	1.5	\$ 975	\$1,462.50
12/5/2017	Baruch, Douglas W.	Address strategy, research and motion.	4.0	\$ 1,285	\$5,140.00
12/5/2017	Gates, Shaun	Review MAVNI HCP documents.	0.3	\$ 745	\$223.50
12/5/2017	McNamara, Brendan	Drafting section of brief and email draft to J. Wollenberg.	3.7	\$ 295	\$1,091.50
12/5/2017	Wollenberg, Jennifer	Address updates/issues re class members.	1.3	\$ 975	\$1,267.50
12/6/2017	Baruch, Douglas W.	Research re administrative record and address motion.	3.5	\$ 1,285	\$4,497.50
12/6/2017	LoBue, Joseph J.	Meeting with team regarding case status and action items.	0.6	\$ 1,180	\$708.00
12/6/2017	McNamara, Brendan	Review class notification issued by Judge Huvelle.	0.6	\$ 295	\$177.00
12/6/2017	Wollenberg, Jennifer	Updates re issues/concerns of class members; strategy discussion with J. LoBue and D. Baruch; prepare materials for email to Government counsel.	4.5	\$ 975	\$4,387.50
12/7/2017	Baruch, Douglas W.	Address motion re reporting.	2.0	\$ 1,285	\$2,570.00
12/7/2017	Wollenberg, Jennifer	Updates re MAVNI issues/concerns from common interest counsel and others; emails with K. Grisez re admin record issues.	1.5	\$ 975	\$1,462.50
12/8/2017	Baruch, Douglas W.	Drafting reporting motion.	3.5	\$ 1,285	\$4,497.50
12/8/2017	Raol, Neaha	Review DOJ filing re: MTD.	0.2	\$ 895	\$179.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/8/2017	Wollenberg, Jennifer	Emails from common interest counsel and others re updates; email from K. Grisez re research on administrative record/discovery; review weekly update and emails re same; review reply re MTD.	2.5	\$ 975	\$2,437.50
12/9/2017	St. Romain, Kate	Prepare emails to clients regarding reply briefs in support of the motion to dismiss and weekly status report; coordinate addition of reply briefs in support of the motion to dismiss to MAVNI litigation website.	0.2	\$ 695	\$139.00
12/10/2017	Baruch, Douglas W.	Address motion re reporting.	1.2	\$ 1,285	\$1,542.00
12/11/2017	Baruch, Douglas W.	Address reporting motion and status.	4.5	\$ 1,285	\$5,782.50
12/11/2017	Gogadze, Helene	Internal discussion regarding research on challenging administrative record under APA; start researching the issues and options in challenging production of administrative record.	1.0	\$ 905	\$905.00
12/11/2017	Raol, Neaha	Follow-up re: recent CIS conference; confer with J. Wollenberg re: same; review MAVNI update/documents; Rand report follow-up.	1.8	\$ 895	\$1,611.00
12/11/2017	Wollenberg, Jennifer	Emails and other updates from MAVNIs and common interest counsel re status and issues; give research assignments to associates.	2.1	\$ 975	\$2,047.50
12/12/2017	Baruch, Douglas W.	Address motion re weekly reporting.	3.0	\$ 1,285	\$3,855.00
12/12/2017	Raol, Neaha	Review govt. MTD in related case for individual MAVNI and confer re: same; review provisions/updates on recently passed NDA law re: MAVNI; correspondence from common interest counsel.	1.7	\$ 895	\$1,521.50
12/12/2017	Wollenberg, Jennifer	Updates, concerns, and issues about MAVNIs and status; emails with common interest counsel and MAVNIs; address various research projects.	1.9	\$ 975	\$1,852.50
12/13/2017	Gogadze, Helene	Review documents for analysis and arguments on challenges related to administrative record.	1.3	\$ 905	\$1,176.50
12/13/2017	Wollenberg, Jennifer	Address MAVNI updates re issues, concerns, and status.	0.8	\$ 975	\$780.00
12/14/2017	Raol, Neaha	Correspondence re: MAVNI; confer with S. Orsini, team re: CIS ombudsman conference recording.	0.5	\$ 895	\$447.50
12/14/2017	St. Romain, Kate	Respond to client and class member emails; coordinate updates MAVNI litigation website; chart new class members; prepare list of MAVNI soldiers not included on prior emails.	1.3	\$ 695	\$903.50
12/14/2017	Wollenberg, Jennifer	Address updates re issues, status, and concerns.	1.5	\$ 975	\$1,462.50
12/15/2017	Baruch, Douglas W.	Address DOJ filings and status.	0.7	\$ 1,285	\$899.50
12/15/2017	Gogadze, Helene	Review documents for analysis and arguments on challenges related to administrative record.	1.0	\$ 905	\$905.00
12/15/2017	Raol, Neaha	Review weekly update, court's order re: status updates/reporting; review correspondence from MAVNI and review/analyze attachment; confer with J. Wollenberg re: same.	1.5	\$ 895	\$1,342.50
12/15/2017	Wollenberg, Jennifer	Address status, issues, updates, and strategy regarding this MAVNI litigation, including review of weekly report and Court orders.	3.5	\$ 975	\$3,412.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
12/16/2017	St. Romain, Kate	Prepare emails to client regarding weekly reporting requirements and weekly status report.	0.4	\$ 695	\$278.00
12/17/2017	Wollenberg, Jennifer	Update emails with MAVNIs and common interest lawyers regarding status and issues/concerns.	0.5	\$ 975	\$487.50
12/18/2017	Baruch, Douglas W.	Address developments and client inquiries.	1.5	\$ 1,285	\$1,927.50
12/18/2017	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	2.2	\$ 905	\$1,991.00
12/18/2017	LoBue, Joseph J.	Drafted submission for naturalization with entry level discharge.	2.1	\$ 1,180	\$2,478.00
12/19/2017	Baruch, Douglas W.	Address motion re reporting.	1.5	\$ 1,285	\$1,927.50
12/19/2017	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	3.0	\$ 905	\$2,715.00
12/19/2017	St. Romain, Kate	Hold telephone conference with MAVNI regarding case status; review article Trump administration asks Supreme Court to overrule decision on DACA documents; coordinate with B. McNamara the collection of filings regarding administrative record review in DACA cases.	0.6	\$ 695	\$417.00
12/19/2017	Wollenberg, Jennifer	Discuss admin record research with H. Gogadze; emails from MAVNIs re updates/concerns.	3.5	\$ 975	\$3,412.50
12/20/2017	Baruch, Douglas W.	Review and address related case and status.	2.0	\$ 1,285	\$2,570.00
12/20/2017	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	4.5	\$ 905	\$4,072.50
12/20/2017	LoBue, Joseph J.	Drafted submission for naturalization with entry level discharge; review decision in similar case.	2.0	\$ 1,180	\$2,360.00
12/20/2017	Raol, Neaha	Review news article and circulate language of interest to team.	0.3	\$ 895	\$268.50
12/20/2017	Wollenberg, Jennifer	Review Tiwari order; emails with team and others re same; updates re MAVNIs status and concerns.	2.5	\$ 975	\$2,437.50
12/21/2017	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	4.5	\$ 905	\$4,072.50
12/21/2017	Raol, Neaha	Confer with MAVNI/class member; follow-up review or articles/research.	1.4	\$ 895	\$1,253.00
12/21/2017	St. Romain, Kate	Review article Building a force of foreign-born Marines is key to the Corps' future.	0.2	\$ 695	\$139.00
12/22/2017	Raol, Neaha	Confer with J. Wollenberg re: update from class member and follow-up re: same; review updated docket entry.	1.1	\$ 895	\$984.50
12/22/2017	Wollenberg, Jennifer	Updates re MAVNI issues and concerns, including call with client.	2.9	\$ 975	\$2,827.50
12/23/2017	Wollenberg, Jennifer	Updates re MAVNI issues and concerns, including call with common interest counsel.	0.6	\$ 975	\$585.00
12/25/2017	Wollenberg, Jennifer	Review emails from MAVNIs and others re updates; emails to internal team re same.	0.5	\$ 975	\$487.50
12/26/2017	Raol, Neaha	Review client correspondence, J. Wollenberg correspondence re: DoD statements and Nio class member update; follow-up re: same; review articles re: MAVNI/naturalization delays.	2.0	\$ 895	\$1,790.00
12/26/2017	St. Romain, Kate	Prepare email to H. Gogadze regarding administrative record research and articles.	0.2	\$ 695	\$139.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
12/26/2017	Wollenberg, Jennifer	Internal emails re admin record research; emails with common interest counsel and others re updates/issues.	2.5	\$ 975	\$2,437.50
12/27/2017	Raol, Neaha	Confer with class member re: interview cancellations; follow-up correspondence with J. Wollenberg re: same; review material from class member.	1.0	\$ 895	\$895.00
12/27/2017	Wollenberg, Jennifer	Emails with common interest counsel and others re MAVNI issues and updates.	0.8	\$ 975	\$780.00
12/28/2017	Raol, Neaha	Review news articles re: MAVNI program.	0.2	\$ 895	\$179.00
12/28/2017	Wollenberg, Jennifer	Review emails re MAVNI updates and issues.	0.9	\$ 975	\$877.50
12/29/2017	Raol, Neaha	Review information from common interest counsel (final agency action argument); review news articles re: MAVNI/naturalization delays.	0.5	\$ 895	\$447.50
12/29/2017	Wollenberg, Jennifer	Updates/emails re MAVNI issues.	0.9	\$ 975	\$877.50
12/31/2017	Wollenberg, Jennifer	Emails with MAVNIs and others re updates/issues.	0.5	\$ 975	\$487.50
1/2/2018	Beary, Webster	Review emails and filings that occurred while out of office.	0.7	\$ 860	\$602.00
1/2/2018	Gates, Shaun	Review correspondence from J. Wollenberg.	0.3	\$ 785	\$235.50
1/2/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	4.0	\$ 960	\$3,840.00
1/2/2018	St. Romain, Kate	Review emails with plaintiff regarding N-426; review Wall Street Journal article regarding MAVNI program.	0.2	\$ 730	\$146.00
1/2/2018	Wollenberg, Jennifer	Address MAVNI updates and issues.	3.8	\$ 1,025	\$3,895.00
1/3/2018	Baruch, Douglas W.	Address DOJ report.	1.4	\$ 1,350	\$1,890.00
1/3/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	5.0	\$ 960	\$4,800.00
1/3/2018	LoBue, Joseph J.	Review legal research; review Government weekly reporting to court.	1.1	\$ 1,240	\$1,364.00
1/3/2018	Raol, Neaha	Review DOJ update filed with court; confer with J. Wollenberg re: same; confer with K. St. Romain re: team calendar.	0.6	\$ 945	\$567.00
1/3/2018	St. Romain, Kate	Email J. Wollenberg regarding email to clients regarding litigation update; email clients regarding litigation update; review bi-weekly status report.	0.4	\$ 730	\$292.00
1/3/2018	Wollenberg, Jennifer	Address issues and updates re MAVNIs.	3.8	\$ 1,025	\$3,895.00
1/4/2018	Baruch, Douglas W.	Address status and strategy.	1.5	\$ 1,350	\$2,025.00
1/4/2018	Gates, Shaun	Review correspondence with government counsel.	0.3	\$ 785	\$235.50
1/4/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	3.0	\$ 960	\$2,880.00
1/4/2018	Raol, Neaha	Review correspondence re: naturalization/oath, correspondence to DOJ.	0.3	\$ 945	\$283.50
1/4/2018	Wollenberg, Jennifer	Address MAVNI updates and issues.	0.7	\$ 1,025	\$717.50
1/5/2018	Baruch, Douglas W.	Address DOJ response.	0.6	\$ 1,350	\$810.00
1/5/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	7.0	\$ 960	\$6,720.00
1/5/2018	Wollenberg, Jennifer	Address updates and issues re MAVNIs.	1.5	\$ 1,025	\$1,537.50
1/6/2018	Wollenberg, Jennifer	Address MAVNI questions by email.	0.3	\$ 1,025	\$307.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/8/2018	Baruch, Douglas W.	Address status, strategy and client inquiries.	1.5	\$ 1,350	\$2,025.00
1/8/2018	Beary, Webster	Review emails.	0.2	\$ 860	\$172.00
1/8/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record.	7.8	\$ 960	\$7,488.00
1/8/2018	Raol, Neaha	Review correspondence with DOJ.	0.2	\$ 945	\$189.00
1/8/2018	Wollenberg, Jennifer	Address updates and concerns re class action and MAVNI circumstances; review research results with H. Gogadze.	2.7	\$ 1,025	\$2,767.50
1/9/2018	Baruch, Douglas W.	Address status, strategy and research.	2.5	\$ 1,350	\$3,375.00
1/9/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record, standards of review, scope of discovery; team meeting.	7.7	\$ 960	\$7,392.00
1/9/2018	LoBue, Joseph J.	Review legal research re discovery in APA case.	1.3	\$ 1,240	\$1,612.00
1/9/2018	Raol, Neaha	Confer with Nio class member.	0.6	\$ 945	\$567.00
1/9/2018	Wollenberg, Jennifer	Address issues and concerns re MAVNIs and class action.	1.2	\$ 1,025	\$1,230.00
1/10/2018	Baruch, Douglas W.	Address administrative record research; meet with H. Gogadze and J. Wollenberg.	2.0	\$ 1,350	\$2,700.00
1/10/2018	Gogadze, Helene	Legal research and analysis on arguments on challenges related to administrative record, standards of review, scope of discovery.	8.0	\$ 960	\$7,680.00
1/10/2018	LoBue, Joseph J.	Meeting with Nio team regarding case status and action items.	1.1	\$ 1,240	\$1,364.00
1/10/2018	St. Romain, Kate	Meeting with H. Gogadze, J. LoBue, J. Wollenberg, D. Baruch regarding administrative record research; draft email for J. Wollenberg regarding administrative record research tasks; attend telephone conference with common interest counsel regarding CI interview schedule; telephone conference with plaintiff; review emails from plaintiff regarding CI results.	1.7	\$ 730	\$1,241.00
1/10/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including calls with class members; Fried Frank internal team discussion re administrative record/discovery research and next steps.	1.6	\$ 1,025	\$1,640.00
1/11/2018	Baruch, Douglas W.	Address status and research; call with soldier; review documents.	1.0	\$ 1,350	\$1,350.00
1/11/2018	Gogadze, Helene	Conduct research on discovery and other issues in APA and constitutional challenge cases; team meeting; internal discussions.	4.5	\$ 960	\$4,320.00
1/11/2018	McNamara, Brendan	Attend motion to dismiss meeting; research discovery issues in cases involving APA and constitutional claims.	3.7	\$ 315	\$1,165.50
1/11/2018	St. Romain, Kate	Attend team meeting regarding litigation plan; email team regarding litigation plan.	0.5	\$ 730	\$365.00
1/11/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including calls with MAVNIs and common interest counsel; team meeting re next steps.	1.5	\$ 1,025	\$1,537.50
1/12/2018	Baruch, Douglas W.	Address declarations and research; address email to counsel and strategy.	2.5	\$ 1,350	\$3,375.00
1/12/2018	Beary, Webster	Interview MAVNI; draft declaration based on MAVNI interview; discuss declarations with J. Wollenberg; send draft of declaration to J. Wollenberg.	5.3	\$ 860	\$4,558.00
1/12/2018	McNamara, Brendan	Conduct research on client issue; discuss findings with J. Wollenberg and D. Baruch.	9.8	\$ 315	\$3,087.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/12/2018	Raol, Neaha	Confer with B. McNamara re: new developments and administrative record/scheduling conference update; review discovery decisions/cites in recent APA/constitutional law claims; follow-up re: DHS ombudsman conference.	2.3	\$ 945	\$2,173.50
1/12/2018	St. Romain, Kate	Email clients regarding Kirwa motion to dismiss order and opinion.	0.3	\$ 730	\$219.00
1/12/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including calls with MAVNIs and common interest counsel, research and discussions re draft declarations, and discussions re the same; email to defense counsel.	8.9	\$ 1,025	\$9,122.50
1/15/2018	Baruch, Douglas W.	Prep and research for motion.	2.0	\$ 1,350	\$2,700.00
1/15/2018	Beary, Webster	Interview MAVNI; draft declarations; discuss declarations with J. Wollenberg; edit declarations; send drafts of declarations to J. Wollenberg, D. Baruch, and J. LoBue.	6.4	\$ 860	\$5,504.00
1/15/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including call and emails with MAVNIs and common interest counsel, discussions with team members re research and other projects, and drafting of declarations.	5.6	\$ 1,025	\$5,740.00
1/15/2018	Woods, Elizabeth	Review case law, statutes, and secondary sources regarding state and federal laws on potential MAVNI issue; prepare and send email summarizing research findings to J. Wollenberg.	3.2	\$ 545	\$1,744.00
1/16/2018	Baruch, Douglas W.	Preparation for hearing.	7.0	\$ 1,350	\$9,450.00
1/16/2018	Beary, Webster	Edit declarations and send to MAVNIs for review; discuss declarations with J. Wollenberg, D. Baruch, and J. LoBue; edit J. Wollenberg declaration.	8.7	\$ 860	\$7,482.00
1/16/2018	LoBue, Joseph J.	Review, edit declarations for court review, edit request for conference with court; review requirements and regulations for Government forms.	3.2	\$ 1,240	\$3,968.00
1/16/2018	McNamara, Brendan	Conduct research on class member issue.	3.8	\$ 315	\$1,197.00
1/16/2018	Wollenberg, Jennifer	Address MAVNI concerns and issues, including email to the Court and review of declarations.	5.2	\$ 1,025	\$5,330.00
1/17/2018	Baruch, Douglas W.	Review and address weekly report; address court order.	0.5	\$ 1,350	\$675.00
1/17/2018	Beary, Webster	Finalize and distribute MAVNI declarations; edit J. Wollenberg's declaration and attachments; edit request for administrative record letter.	8.5	\$ 860	\$7,310.00
1/17/2018	Gates, Shaun	Review court order re: status conference.	0.2	\$ 785	\$157.00
1/17/2018	Gogadze, Helene	Conduct research on the scope of discovery in APA and constitutional claim cases.	4.0	\$ 960	\$3,840.00
1/17/2018	LoBue, Joseph J.	Review court order on Government reporting requirements; meeting with litigation team regarding case status and action items; review legal research and administrative record and potential discovery.	2.6	\$ 1,240	\$3,224.00
1/17/2018	McNamara, Brendan	Conduct research on client issue; draft document with analysis.	4.7	\$ 315	\$1,480.50
1/17/2018	Raol, Neaha	Review court's order and confer with various team members re: same; review status updates filed by defendants.	2.1	\$ 945	\$1,984.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/17/2018	St. Romain, Kate	Review email to Court regarding status conference topics; email clients regarding bi-weekly reporting and Court order regarding status conference; email plaintiff regarding status conference; analyze Court order regarding response and reporting; update to MAVNI litigation website; email common interest counsel regarding bi-weekly reporting and Court order regarding status conference; email plaintiff regarding status conference.	1.2	\$ 730	\$876.00
1/17/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including review of declarations/situations and review of Court Order.	8.0	\$ 1,025	\$8,200.00
1/18/2018	Beary, Webster	Edit request for administrative record letter; interview MAVNI service members; draft additional declarations.	7.2	\$ 860	\$6,192.00
1/18/2018	Gogadze, Helene	Conduct research on the scope of discovery in APA and constitutional claim cases.	4.0	\$ 960	\$3,840.00
1/18/2018	McNamara, Brendan	Conduct research on client issue; read case law and prepare analysis.	9.3	\$ 315	\$2,929.50
1/18/2018	Raol, Neaha	Review updated material provided to government, response/correspondence from class members and common interest counsel.	0.6	\$ 945	\$567.00
1/18/2018	Wollenberg, Jennifer	Address MAVNI issues/updates.	1.3	\$ 1,025	\$1,332.50
1/19/2018	Baruch, Douglas W.	Team meeting re status conference; research and prepare for same.	4.5	\$ 1,350	\$6,075.00
1/19/2018	Beary, Webster	Communicate with MAVNIs regarding declarations; team meeting on upcoming court hearing; edit MAVNI declarations.	7.4	\$ 860	\$6,364.00
1/19/2018	Gates, Shaun	Meeting to discuss upcoming status conference; prepare materials in advance of hearing.	1.6	\$ 785	\$1,256.00
1/19/2018	McNamara, Brendan	Finalize research on client issue; meet with D. Baruch and J. Wollenberg to discuss findings and analysis.	7.3	\$ 315	\$2,299.50
1/19/2018	Raol, Neaha	Review updates; confer with J. Wollenberg re: same; confer with MAVNI class member; team meeting re: prep for status conference.	2.0	\$ 945	\$1,890.00
1/19/2018	St. Romain, Kate	Coordinate team meeting regarding status conference; attend team meeting regarding status conference; email with MAVNI plaintiffs regarding status conference.	1.5	\$ 730	\$1,095.00
1/19/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns; team meeting to discuss upcoming hearing.	5.0	\$ 1,025	\$5,125.00
1/20/2018	Beary, Webster	Edit MAVNI declarations; discuss edits with J. Wollenberg.	3.5	\$ 860	\$3,010.00
1/20/2018	Wollenberg, Jennifer	Address MAVNI problems, including drafting various declarations and arguments, emailing with MAVNIs and team members, and preparing materials for upcoming hearing.	8.8	\$ 1,025	\$9,020.00
1/21/2018	Baruch, Douglas W.	Declarations and hearing preparation.	2.0	\$ 1,350	\$2,700.00
1/21/2018	Beary, Webster	Edit MAVNI declarations; discuss edits with J. Wollenberg.	2.0	\$ 860	\$1,720.00
1/21/2018	Raol, Neaha	Review draft declarations, correspondence with DOJ; class member emails.	0.5	\$ 945	\$472.50
1/21/2018	Wollenberg, Jennifer	Work on declarations and discussions re same; emails with MAVNIs and others re concerns and issues.	6.5	\$ 1,025	\$6,662.50
1/22/2018	Baruch, Douglas W.	Prepare for hearing; team meeting; address relief; client issues.	3.5	\$ 1,350	\$4,725.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/22/2018	Beary, Webster	Team meeting; edit and redact declarations; send draft letter to H. Gogadze for review; research retroactivity issue.	8.1	\$ 860	\$6,966.00
1/22/2018	Gates, Shaun	Review APA arguments in preparation for hearing; prepare outline of APA argument.	6.1	\$ 785	\$4,788.50
1/22/2018	Gogadze, Helene	Conduct research on the scope of discovery in APA and constitutional claim cases; team meeting regarding court appearance tomorrow.	4.0	\$ 960	\$3,840.00
1/22/2018	LoBue, Joseph J.	Review Government filing regarding class naturalization issues; meeting with team regarding January 23 hearing; prepare for January 23 hearing.	4.8	\$ 1,240	\$5,952.00
1/22/2018	McNamara, Brendan	Attend MAVNI motion to dismiss/status conference meeting; conduct research and review documents to prepare materials for upcoming conference.	6.5	\$ 315	\$2,047.50
1/22/2018	Raol, Neaha	Review material filed by government; confer with Jenny re: tables and information provided re: MAVNIs; conference with Nio class member.	2.1	\$ 945	\$1,984.50
1/22/2018	St. Romain, Kate	Email W. Beary and S. Gates regarding potential status conference exhibits; prepare exhibits for status conference; coordinate updates to MAVNI litigation website; analyze defendants response to court's January 17, 2018 order; email plaintiff regarding status conference; attend team meeting regarding status conference plan; email clients regarding defendants' response to Court's January 17, 2018 order; email common interest counsel regarding defendants' response to Court's January 17, 2018 order.	3.4	\$ 730	\$2,482.00
1/22/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs and common interest counsel, internal discussions and emails, and preparation of declarations and other materials for upcoming hearing.	8.1	\$ 1,025	\$8,302.50
1/23/2018	Baruch, Douglas W.	Prepare for and attend court status conference; team meetings re same; correspondence with DOJ.	6.0	\$ 1,350	\$8,100.00
1/23/2018	Beary, Webster	Draft filing; prep for court hearing; attend court hearing; attend team meeting debriefing on hearing.	8.0	\$ 860	\$6,880.00
1/23/2018	Gates, Shaun	Revise outline of APA arguments in preparation for hearing.	1.0	\$ 785	\$785.00
1/23/2018	Gogadze, Helene	Attend the hearing; team meetings and discussions.	5.0	\$ 960	\$4,800.00
1/23/2018	LoBue, Joseph J.	Prepare for court hearing; attend court hearing.	3.9	\$ 1,240	\$4,836.00
1/23/2018	McNamara, Brendan	Prepare materials for status conference; attend status conference and participate in post-conference debriefing.	7.2	\$ 315	\$2,268.00
1/23/2018	Raol, Neaha	Prep for status conference (re: material); team meeting following hearing; review court order/docket entries.	1.3	\$ 945	\$1,228.50
1/23/2018	St. Romain, Kate	Call with J. Wollenberg and B. McNamara regarding exhibits; prepare hearing exhibits; attend status conference; attend team meeting regarding status conference and litigation next steps; email clients regarding status conference and litigation next steps; review redacted versions of status conference declarations; coordinate updates to MAVNI litigation website; analyze court orders; email common interest counsel regarding court orders and status conference.	8.6	\$ 730	\$6,278.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
1/23/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails from MAVNIs and common interest counsel as well as discussions with internal team members; prepare for and attend hearing; follow-up from hearing.	12.5	\$ 1,025	\$12,812.50
1/24/2018	Baruch, Douglas W.	Strategy meetings and calls; address client issues.	2.5	\$ 1,350	\$3,375.00
1/24/2018	Beary, Webster	Coordinate with J. Wollenberg regarding MAVNI followup; research retroactivity cases.	0.7	\$ 860	\$602.00
1/24/2018	LoBue, Joseph J.	Meeting with J. Wollenberg and D. Baruch regarding case status, action items and problems with naturalization of named plaintiffs; e-mail exchanges with Government regarding named plaintiff naturalization problems.	2.6	\$ 1,240	\$3,224.00
1/24/2018	McNamara, Brendan	Draft notice pertaining to subset of MAVNI class with completed background checks and coordinate creation of new Nio inbox; review files of soldiers with completed background investigations.	2.8	\$ 315	\$882.00
1/24/2018	Raol, Neaha	Review Mattis statements and confer with K. St. Romain re: same; review correspondence re: various outstanding issues from J. Wollenberg.	0.7	\$ 945	\$661.50
1/24/2018	St. Romain, Kate	Email common interest counsel regarding status conference; call with plaintiff and J. Wollenberg regarding USCIS N-400 appointment; analyze transcript of Sec. Mattis discussion of MAVNI program; call with Neaha regarding Mattis statement; email B. McNamara regarding defendants' answer.	0.9	\$ 730	\$657.00
1/24/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails and discussions with MAVNIs and others.	9.8	\$ 1,025	\$10,045.00
1/25/2018	Baruch, Douglas W.	Address soldier inquiries and DOJ correspondence.	1.8	\$ 1,350	\$2,430.00
1/25/2018	Beary, Webster	Interview MAVNI; communicate with MAVNI team regarding additional tasks.	1.4	\$ 860	\$1,204.00
1/25/2018	McNamara, Brendan	Finalize notice for MAVNI subset class; phone call with MAVNI soldier and W. Beary; documenting interviews with MAVNI soldiers.	2.6	\$ 315	\$819.00
1/25/2018	Raol, Neaha	Draft/revise email to DOJ re: tables/reports submitted to court; confer with D. Baruch, J. Wollenberg; confer with K. St. Romain, S. Gates re: outstanding tasks; confer with team/review material re: no show examples.	3.2	\$ 945	\$3,024.00
1/25/2018	St. Romain, Kate	Email B. McNamara regarding MAVNIs ready for naturalization; meet with S. Gates regarding email responses; draft emails to MAVNIs with naturalization concerns; call with N. Raol regarding tasks from J. Wollenberg; MAVNI calls for J. Wollenberg; call and draft emails regarding plaintiff USCIS appointment; telephone conference with class members regarding naturalization; telephone conference with plaintiff and email J. Wollenberg regarding telephone conference; email plaintiff regarding reporting errors.	3.4	\$ 730	\$2,482.00
1/25/2018	Wollenberg, Jennifer	Address issues/concerns for MAVNIs, including emails with MAVNIs and common interest counsel, discussions with internal team, and emails with DOJ attorneys.	3.1	\$ 1,025	\$3,177.50
1/26/2018	Baruch, Douglas W.	Multiple calls and emails re soldier inquiries and status.	2.2	\$ 1,350	\$2,970.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/26/2018	Beary, Webster	Discuss case with D. Baruch and K. St. Romain; review MAVNI tracker system and discuss with B. McNamara; draft email to DOJ regarding MAVNI naturalization; review answer in related case.	2.8	\$ 860	\$2,408.00
1/26/2018	Gogadze, Helene	Review case materials.	1.0	\$ 960	\$960.00
1/26/2018	McNamara, Brendan	Summarize phone call with MAVNI soldier and identify MAVNI soldiers with completed background checks for email to DOJ.	2.3	\$ 315	\$724.50
1/26/2018	Raol, Neaha	Analyze Government tables and confer with/send to K. St. Romain; prep for and meet with common interest counsel; correspondence with named class member.	3.2	\$ 945	\$3,024.00
1/26/2018	St. Romain, Kate	Email J. Wollenberg regarding MAVNI telephone conference appointments; coordinate response to MAVNIs ready for naturalization; draft email for D. Baruch regarding plaintiff's USCIS appointment; review MAVNI media articles and email team regarding media reports; email team regarding tracking with Glanz declaration.	1.2	\$ 730	\$876.00
1/26/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including internal emails, call with team members, MAVNI emails, and common interest emails.	3.5	\$ 1,025	\$3,587.50
1/28/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including calls and emails with MAVNIs, internal emails, emails with common interest counsel, and email to DOJ attorneys.	4.5	\$ 1,025	\$4,612.50
1/29/2018	Baruch, Douglas W.	Address inquiries and status.	0.5	\$ 1,350	\$675.00
1/29/2018	Beary, Webster	Review MAVNI materials; Interview MAVNI; email common interest counsel.	1.0	\$ 860	\$860.00
1/29/2018	LoBue, Joseph J.	E-mail exchanges with Government counsel.	0.4	\$ 1,240	\$496.00
1/29/2018	McNamara, Brendan	Conduct research on requests for referral to magistrate judge in DC federal court.	1.3	\$ 315	\$409.50
1/29/2018	Raol, Neaha	Review various issues and prepare email to DOJ; confer/correspondence with J. Wollenberg, B. McNamara re: same; confer with Nio class member.	3.2	\$ 945	\$3,024.00
1/29/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including multiple MAVNI calls and draft email to DOJ attorneys re issues/concerns/magistrate.	6.2	\$ 1,025	\$6,355.00
1/30/2018	Baruch, Douglas W.	Address soldier inquiries and DOJ correspondence.	1.8	\$ 1,350	\$2,430.00
1/30/2018	Gogadze, Helene	Internal team discussion; address possible referral to magistrate judge.	2.5	\$ 960	\$2,400.00
1/30/2018	LoBue, Joseph J.	Conference call with MAVNI class members regarding naturalization issues.	0.9	\$ 1,240	\$1,116.00
1/30/2018	McNamara, Brendan	Conduct research on requests for referral to magistrate judge in DC federal court.	1.4	\$ 315	\$441.00
1/30/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including calls/emails with MAVNIs and others.	5.0	\$ 1,025	\$5,125.00
1/31/2018	Baruch, Douglas W.	Address soldier inquiries and correspondence with DOJ; review filings.	2.0	\$ 1,350	\$2,700.00
1/31/2018	Beary, Webster	Draft letter to MAVNI; discuss case with B. McNamara and J. Wollenberg.	0.4	\$ 860	\$344.00
1/31/2018	Gates, Shaun	Correspondence with named-plaintiff re: naturalization status.	0.2	\$ 785	\$157.00
1/31/2018	Gogadze, Helene	Review transcript of the status conference in the Nio action; address possible referral to magistrate judge.	2.0	\$ 960	\$1,920.00
1/31/2018	McNamara, Brendan	Review transcript for relevant excerpts to incorporate in motion and memo of law; edit and prepare memo of law in support of referral of issues to magistrate judge.	7.0	\$ 315	\$2,205.00
1/31/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails/calls with MAVNIs, common interest counsel, internal team, and DOJ.	4.8	\$ 1,025	\$4,920.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/1/2018	Baruch, Douglas W.	Meeting with common interest counsel; multiple emails to DOJ; strategy meetings; address filings.	3.5	\$ 1,350	\$4,725.00
2/1/2018	Beary, Webster	Research retroactivity argument.	4.2	\$ 860	\$3,612.00
2/1/2018	LoBue, Joseph J.	Conference calls with MAVNI individual counsel regarding case status and case-specific issues; meeting with common interest counsel regarding depositions and Government document production.	2.0	\$ 1,240	\$2,480.00
2/1/2018	Raol, Neaha	Confer with J. Wollenberg; prep for meeting with common interest counsel.	0.2	\$ 945	\$189.00
2/1/2018	Wollenberg, Jennifer	Calls/emails with MAVNIs, common interest counsel, and others regarding MAVNI issues and concerns; discuss MAVNI projects with team members.	4.5	\$ 1,025	\$4,612.50
2/2/2018	Baruch, Douglas W.	Address soldier inquiries, website update, and DOJ correspondence.	2.0	\$ 1,350	\$2,700.00
2/2/2018	Beary, Webster	Research and draft retroactivity argument.	4.3	\$ 860	\$3,698.00
2/2/2018	Gogadze, Helene	Work on draft motion and memo of law regarding referral of N-426 issues to magistrate judge; internal discussions.	4.0	\$ 960	\$3,840.00
2/2/2018	McNamara, Brendan	Review transcripts, pleadings, and declarations for information related to timing issues for background checks.	3.3	\$ 315	\$1,039.50
2/2/2018	Raol, Neaha	Confer with J. Wollenberg; email/phone correspondence with Nio class member; correspondence with common interest counsel; review hearing transcript.	2.2	\$ 945	\$2,079.00
2/2/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns and projects for litigation, including calls with MAVNIs and common interest counsel and discussions with internal team members.	6.1	\$ 1,025	\$6,252.50
2/3/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs and others.	2.3	\$ 1,025	\$2,357.50
2/4/2018	Baruch, Douglas W.	Address soldier inquiries and DOJ correspondence.	2.2	\$ 1,350	\$2,970.00
2/4/2018	Gogadze, Helene	Review certain MAVNIS' specific circumstances; contact MAVNIS; set up information phone calls for tomorrow with MAVNIS and common interest counsel; prepare points for discussions.	10.0	\$ 960	\$9,600.00
2/4/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs, others, and internal team.	8.7	\$ 1,025	\$8,917.50
2/5/2018	Baruch, Douglas W.	Multiple client calls and meetings re status and strategy.	2.8	\$ 1,350	\$3,780.00
2/5/2018	Beary, Webster	Draft email to DOJ; review MAVNI materials; review hearing transcript; draft retroactivity argument.	6.7	\$ 860	\$5,762.00
2/5/2018	Gogadze, Helene	Teleconference with MAVNIs and with common interest counsel; internal team discussions regarding next steps and filings; draft motions.	9.7	\$ 960	\$9,312.00
2/5/2018	LoBue, Joseph J.	Conference call with common interest counsel regarding naturalization issues; conference call with class members regarding naturalization issues.	1.4	\$ 1,240	\$1,736.00
2/5/2018	McNamara, Brendan	Review transcripts, pleadings, and declarations for information related to timing issues for background checks; prepare document for J. Wollenberg.	4.1	\$ 315	\$1,291.50
2/5/2018	Raol, Neaha	Confer/correspondence with class members, FF team members.	1.2	\$ 945	\$1,134.00

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2/5/2018	St. Romain, Kate	Review website updates; analyze Defendants' Answer to Plaintiffs' Second Amended Complaint; coordinate changes to the Nio Class Counsel inbox; email plaintiff regarding bi-weekly reporting; email Nio named plaintiffs regarding HRC screen security eligibility.	2.4	\$ 730	\$1,752.00
2/5/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including conference calls with MAVNIs, other calls/emails with MAVNIs and common interest counsel, and discussions with internal team.	13.1	\$ 1,025	\$13,427.50
2/6/2018	Baruch, Douglas W.	Address motion for conference; address soldier inquiries.	3.0	\$ 1,350	\$4,050.00
2/6/2018	Beary, Webster	Research and draft retroactivity summary; discuss with J. Wollenberg; review MAVNI materials and draft DOJ email.	7.5	\$ 860	\$6,450.00
2/6/2018	Gogadze, Helene	Draft motion for conference with Magistrate Judge; internal discussions regarding next steps; draft emails to MAVNIs.	9.5	\$ 960	\$9,120.00
2/6/2018	LoBue, Joseph J.	Review, edit motion for hearing with Magistrate Judge.	1.2	\$ 1,240	\$1,488.00
2/6/2018	McNamara, Brendan	Review transcripts, pleadings and declarations for support related to what is entailed in NIAC and Tier 3 and 5 investigations.	2.5	\$ 315	\$787.50
2/6/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/questions, including discussions with MAVNIs and common interest counsel plus internal discussions.	5.1	\$ 1,025	\$5,227.50
2/7/2018	Baruch, Douglas W.	Address motions and soldier inquiries; strategy discussions.	3.3	\$ 1,350	\$4,455.00
2/7/2018	Beary, Webster	Review MAVNI materials and draft DOJ email; research retroactivity cases and send research to J. Wollenberg for review.	4.3	\$ 860	\$3,698.00
2/7/2018	Gogadze, Helene	Finalize and submit motion for conference with Magistrate Judge in Nio; draft and send emails for MAVNIs.	7.2	\$ 960	\$6,912.00
2/7/2018	LoBue, Joseph J.	Review, edit e-mails to opposing counsel regarding naturalization issues; review, edit submission to Magistrate Judge; review legal research regarding retroactivity.	2.6	\$ 1,240	\$3,224.00
2/7/2018	St. Romain, Kate	Email H. Gogadze regarding proposed orders for Nio motions; updates for MAVNI litigation website; draft email to named plaintiffs regarding magistrate motions for J. Wollenberg.	0.8	\$ 730	\$584.00
2/7/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including communications with class members, common interest counsel, and internal team members; draft motion for conference with magistrate judge.	6.5	\$ 1,025	\$6,662.50
2/8/2018	Baruch, Douglas W.	Email to DOJ; status and strategy.	3.5	\$ 1,350	\$4,725.00
2/8/2018	Beary, Webster	Research retroactivity; draft email to DOJ; review MAVNI materials; discuss case with J. Wollenberg.	4.7	\$ 860	\$4,042.00
2/8/2018	Gogadze, Helene	Team discussions; review correspondence and documents; draft email correspondence.	4.0	\$ 960	\$3,840.00
2/8/2018	LoBue, Joseph J.	Review, edit e-mails to Government regarding naturalization issues.	0.8	\$ 1,240	\$992.00
2/8/2018	McNamara, Brendan	Research secondary sources and case law on the standard for a motion for reconsideration.	5.2	\$ 315	\$1,638.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
2/8/2018	St. Romain, Kate	Email named plaintiffs regarding motions to conference with the magistrate judge and motion to refer case to the magistrate judge.	0.3	\$ 730	\$219.00
2/8/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including numerous emails and discussions re same.	11.1	\$ 1,025	\$11,377.50
2/9/2018	Baruch, Douglas W.	Meetings and calls re status and strategy and address MJ hearing.	3.5	\$ 1,350	\$4,725.00
2/9/2018	Beary, Webster	Draft email to DOJ; review MAVNI materials; interview MAVNIS; discuss case with J. Wollenberg.	2.1	\$ 860	\$1,806.00
2/9/2018	Gogadze, Helene	Team meeting and discussion; review of correspondence and documents; draft notes for the call with Defendants and for submission to Magistrate Judge.	7.0	\$ 960	\$6,720.00
2/9/2018	McNamara, Brendan	Finalize research on motion for reconsideration standard and email J. Wollenberg; meet with J. LoBue and D. Baruch to discuss findings.	0.4	\$ 315	\$126.00
2/9/2018	Raol, Neaha	Review recent correspondence from class members, government.	1.0	\$ 945	\$945.00
2/9/2018	St. Romain, Kate	Coordinate telephone conference with defense counsel regarding joint magistrate proposal; telephone conference with D. Baruch, J. Wollenberg, and H. Gogadze regarding joint magistrate proposal report; email H. Gogadze regarding elements for joint magistrate proposal report.	2.6	\$ 730	\$1,898.00
2/9/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns.	8.1	\$ 1,025	\$8,302.50
2/10/2018	Beary, Webster	Interview MAVNIS; draft and edit MAVNI declarations; discuss with J. Wollenberg.	4.5	\$ 860	\$3,870.00
2/10/2018	Gogadze, Helene	Draft notes for the call with Defendants and for submission to Magistrate Judge.	6.6	\$ 960	\$6,336.00
2/10/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with class members, common interest counsel, and internal team members; calls and drafting re declarations.	7.8	\$ 1,025	\$7,995.00
2/11/2018	Baruch, Douglas W.	Edits and revisions to declarations and email to DOJ.	1.8	\$ 1,350	\$2,430.00
2/11/2018	Beary, Webster	Draft and edit MAVNI declarations; discuss with J. Wollenberg.	1.5	\$ 860	\$1,290.00
2/11/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIS and others; prepare declarations.	2.7	\$ 1,025	\$2,767.50
2/12/2018	Baruch, Douglas W.	Address MJ hearing and proposal; call with DOJ and follow up.	4.0	\$ 1,350	\$5,400.00
2/12/2018	Beary, Webster	Team meeting; call with DOJ; review MAVNI materials; draft email to DOJ; correspond with MAVNIS.	4.4	\$ 860	\$3,784.00
2/12/2018	Gates, Shaun	Prepare for status conference; status conference.	2.1	\$ 785	\$1,648.50
2/12/2018	LoBue, Joseph J.	Prepare for meeting and conference call with Government lawyers; conference call with Government lawyers; review, edit joint submission to Magistrate Judge.	3.1	\$ 1,240	\$3,844.00
2/12/2018	St. Romain, Kate	Attend team meeting regarding joint magistrate proposal plan; attend telephone conference with team and defense counsel regarding joint magistrate proposal; edit joint magistrate proposal.	2.9	\$ 730	\$2,117.00
2/12/2018	Wollenberg, Jennifer	Address issues/concerns by emails/discussions with MAVNIS, common interest counsel, and internal team; meet and confer with defense counsel re joint filing; draft joint filing.	5.9	\$ 1,025	\$6,047.50
2/13/2018	Baruch, Douglas W.	Address soldier inquiries, DOJ correspondence, emails and meetings.	2.5	\$ 1,350	\$3,375.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/13/2018	Beary, Webster	Discuss case with J. Wollenberg.	0.6	\$ 860	\$516.00
2/13/2018	LoBue, Joseph J.	Review, edit joint submission to the Court; meeting with B. McNamara regarding legal research issues; review research.	2.1	\$ 1,240	\$2,604.00
2/13/2018	McNamara, Brendan	Conduct research on de facto policy violations by agencies.	0.5	\$ 315	\$157.50
2/13/2018	St. Romain, Kate	Call with J. Wollenberg regarding telephone conference with immigration lawyers; identify soldiers going to basic training; email J. Wollenberg and W. Beary regarding MAVNIs ready to naturalize; identify status report regarding FBI background checks.	0.7	\$ 730	\$511.00
2/13/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including calls/emails with MAVNIs, common interest counsel, and internal team.	7.5	\$ 1,025	\$7,687.50
2/14/2018	Baruch, Douglas W.	Address DOJ filings; finalize joint proposal.	2.5	\$ 1,350	\$3,375.00
2/14/2018	Beary, Webster	Team meeting; update tracker; correspond with MAVNIs; review MAVNI materials and draft DOJ email.	3.3	\$ 860	\$2,838.00
2/14/2018	LoBue, Joseph J.	Review, edit joint submission to Magistrate Judge; review legal research.	3.4	\$ 1,240	\$4,216.00
2/14/2018	McNamara, Brendan	Conduct research on de facto policy violations by agencies.	4.8	\$ 315	\$1,512.00
2/14/2018	Raol, Neaha	Review joint status report; Nio report; confer re: same.	1.0	\$ 945	\$945.00
2/14/2018	St. Romain, Kate	Analyze status report; email clients regarding litigation update and court filings.	0.4	\$ 730	\$292.00
2/14/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs, common interest counsel, and internal team; address joint proposal to magistrate judge.	10.1	\$ 1,025	\$10,352.50
2/15/2018	Baruch, Douglas W.	Hearing prep; DOJ correspondence; deposition review; strategy.	3.5	\$ 1,350	\$4,725.00
2/15/2018	Beary, Webster	Address MAVNI issues/research	5.1	\$ 860	\$4,386.00
2/15/2018	LoBue, Joseph J.	Prepare for hearing before Magistrate Judge.	3.1	\$ 1,240	\$3,844.00
2/15/2018	McNamara, Brendan	Research and read case law and secondary sources on de facto violations by agencies of their own policies; draft email to D. Baruch, J. LoBue, and J. Wollenberg summarizing findings.	7.1	\$ 315	\$2,236.50
2/15/2018	St. Romain, Kate	Call with J. Wollenberg regarding magistrate judge hearing materials; review emails from clients.	0.7	\$ 730	\$511.00
2/15/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including discussions with MAVNIs, common interest counsel, and internal team members; prepare for tomorrow's hearing.	10.9	\$ 1,025	\$11,172.50
2/16/2018	Baruch, Douglas W.	Court hearing and strategy meetings.	4.0	\$ 1,350	\$5,400.00
2/16/2018	Beary, Webster	Prep for magistrate hearing; attend magistrate hearing; discuss case with team.	5.5	\$ 860	\$4,730.00
2/16/2018	Gates, Shaun	Prepare for and attend hearing with Magistrate re: monthly reporting; post-hearing team meeting to discuss strategy.	4.2	\$ 785	\$3,297.00
2/16/2018	Gogadze, Helene	Attend court appearance; attend team meeting on the next steps.	5.0	\$ 960	\$4,800.00
2/16/2018	LoBue, Joseph J.	Prepare for hearing before Magistrate Judge; attend hearing.	3.7	\$ 1,240	\$4,588.00
2/16/2018	McNamara, Brendan	Participate in team debriefing following hearing before magistrate.	1.7	\$ 315	\$535.50
2/16/2018	Raol, Neaha	Hearing with magistrate judge; team meeting; review case/matter material/updates.	5.0	\$ 945	\$4,725.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
2/16/2018	St. Romain, Kate	Review Joint Proposal for hearing with magistrate judge; attend hearing regarding joint proposal; attend team meeting regarding debrief from hearing and proposed plan for upcoming filings; review emails from named plaintiffs; email J. LoBue regarding amended complaint and prepare client description for amended complaint.	4.8	\$ 730	\$3,504.00
2/16/2018	Stachniak Kaplan, Kayla	Discuss case with team members.	1.2	\$ 960	\$1,152.00
2/16/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including discussions with MAVNIs, common interest counsel, and internal team members; prepare for and attend hearing; team meeting re next projects/strategy.	10.1	\$ 1,025	\$10,352.50
2/16/2018	Woods, Elizabeth	Conference with MAVNI litigation team regarding magistrate hearing and next steps.	1.1	\$ 545	\$599.50
2/17/2018	Wollenberg, Jennifer	Emails with team members, MAVNIs, and others re issues/concerns, including declarations, amended complaint, etc.	5.4	\$ 1,025	\$5,535.00
2/18/2018	Beary, Webster	Correspond with MAVNIs; review MAVNI materials.	2.0	\$ 860	\$1,720.00
2/18/2018	Raol, Neaha	Correspondence/review re: amended answer.	0.5	\$ 945	\$472.50
2/18/2018	Wollenberg, Jennifer	MAVNI emails, team emails, and draft emails to DOJ regarding MAVNI issues/concerns.	9.2	\$ 1,025	\$9,430.00
2/19/2018	Beary, Webster	Correspond with MAVNIs; review MAVNI materials; set up phone calls with MAVNIs.	1.0	\$ 860	\$860.00
2/19/2018	Wollenberg, Jennifer	Emails with MAVNIs re issues/concerns.	0.8	\$ 1,025	\$820.00
2/20/2018	Beary, Webster	Team meeting; interview MAVNIs; draft email to DOJ; email MAVNIs.	4.1	\$ 860	\$3,526.00
2/20/2018	Gogadze, Helene	Draft motion for leave to amend complaint; legal research and analysis for the motion.	7.0	\$ 960	\$6,720.00
2/20/2018	LoBue, Joseph J.	Review materials for Third Amended Complaint; outline Third Amended Complaint.	2.7	\$ 1,240	\$3,348.00
2/20/2018	McNamara, Brendan	Conduct legal research on de facto rule violations; attend meeting to discuss MAVNI declarations.	7.1	\$ 315	\$2,236.50
2/20/2018	Raol, Neaha	MAVNI team meeting; calls with Nio class members w/ ship dates; review background material, prior declarations, etc.; review court order.	2.8	\$ 945	\$2,646.00
2/20/2018	St. Romain, Kate	Address emails from clients.	0.2	\$ 730	\$146.00
2/20/2018	Stachniak Kaplan, Kayla	Prepare motion for preliminary injunction; review background material.	2.6	\$ 960	\$2,496.00
2/20/2018	Szlarb, Natalia	Attend conference call with Jennifer Wollenberg and Nio class members; draft and review declarations of Nio class members.	4.2	\$ 545	\$2,289.00
2/20/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including calls with MAVNIs re declarations, team meetings re upcoming tasks, and conversations with common interest counsel.	3.4	\$ 1,025	\$3,485.00
2/20/2018	Woods, Elizabeth	Conference with MAVNI litigation team regarding obtaining declarations from class members detailing members' injury; telephone conference with class members regarding members' injury; prepare declaration of class member.	3.1	\$ 545	\$1,689.50
2/21/2018	Baruch, Douglas W.	Address declarations and correspondence with DOJ.	0.9	\$ 1,350	\$1,215.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/21/2018	Beary, Webster	Prepare email to DOJ; communicate with MAVNIs; review MAVNI materials.	1.5	\$ 860	\$1,290.00
2/21/2018	Gogadze, Helene	Draft motion for leave to amend complaint; legal research and analysis for the motion.	7.0	\$ 960	\$6,720.00
2/21/2018	LoBue, Joseph J.	Review materials for Third Amended Complaint; draft Third Amended Complaint.	4.2	\$ 1,240	\$5,208.00
2/21/2018	McNamara, Brendan	Phone calls with MAVNI soldiers; prepare declarations.	7.0	\$ 315	\$2,205.00
2/21/2018	Raol, Neaha	Calls with Nio class members with ship dates; review and revise draft declarations; confer with J. Wollenberg, other team members re: same.	3.7	\$ 945	\$3,496.50
2/21/2018	Stachniak Kaplan, Kayla	Prepare motion for preliminary injunction.	0.6	\$ 960	\$576.00
2/21/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members; conference calls with Jennifer Wollenberg and Neaha Raol regarding Nio class members' declarations.	8.1	\$ 545	\$4,414.50
2/21/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including multiple MAVNI calls re draft declarations and team member discussions re same.	5.4	\$ 1,025	\$5,535.00
2/21/2018	Woods, Elizabeth	Prepare declarations for members of Nio class; coordinate telephone conferences with class members regarding preparation of declarations; telephone conference with class members regarding preparation of declarations.	9.3	\$ 545	\$5,068.50
2/22/2018	Baruch, Douglas W.	Address DOJ correspondence and soldier declarations.	2.5	\$ 1,350	\$3,375.00
2/22/2018	Gogadze, Helene	Team meeting and discussion regarding motion for reconsideration; draft opposition to motion for reconsideration; legal research and analysis for the opposition.	8.8	\$ 960	\$8,448.00
2/22/2018	McNamara, Brendan	Phone calls with MAVNI soldiers; prepare declarations.	9.1	\$ 315	\$2,866.50
2/22/2018	Raol, Neaha	Review draft declarations; confer with team re: same.	1.1	\$ 945	\$1,039.50
2/22/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members; conference calls with Jennifer Wollenberg and Neaha Raol regarding Nio class members' declarations.	7.2	\$ 545	\$3,924.00
2/22/2018	Wollenberg, Jennifer	Address MAVNI issue/concerns, including calls with various MAVNIs re draft declarations, emails with MAVNIs and common interest counsel, and discussions with team members re upcoming projects/briefs/etc.	10.4	\$ 1,025	\$10,660.00
2/22/2018	Woods, Elizabeth	Prepare declarations for members of Nio class.	4.4	\$ 545	\$2,398.00
2/23/2018	Baruch, Douglas W.	Address DOJ correspondence and strategy.	1.5	\$ 1,350	\$2,025.00
2/23/2018	Beary, Webster	Communicate with MAVNIs; review MAVNI materials.	1.7	\$ 860	\$1,462.00
2/23/2018	Gogadze, Helene	Draft opposition to motion for reconsideration; legal research and analysis for the opposition.	7.0	\$ 960	\$6,720.00
2/23/2018	LoBue, Joseph J.	Review, edit declarations in support of preliminary injunction Motion; draft Third Amended Complaint.	3.5	\$ 1,240	\$4,340.00
2/23/2018	McNamara, Brendan	Phone calls with MAVNI soldiers; prepare declarations.	4.1	\$ 315	\$1,291.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/23/2018	Raol, Neaha	Confer with Nio class members with ship dates; confer with Nio class member; correspondence with team re: status/declarations/updates; review/revise draft declarations; review DOJ correspondence re: MAVNIs with ship dates.	4.0	\$ 945	\$3,780.00
2/23/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members.	1.2	\$ 545	\$654.00
2/23/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including draft declarations, emails/calls with MAVNIs and common interest counsel, and discussions with team members.	9.3	\$ 1,025	\$9,532.50
2/23/2018	Woods, Elizabeth	Prepare and review declarations for members of Nio class.	0.6	\$ 545	\$327.00
2/24/2018	Baruch, Douglas W.	Address declarations and amended complaint theories.	1.5	\$ 1,350	\$2,025.00
2/24/2018	McNamara, Brendan	Conduct legal research for opposition to motion for reconsideration; finalize MAVNI declaration.	2.2	\$ 315	\$693.00
2/24/2018	Raol, Neaha	Draft declarations and review/revise re: same.	2.8	\$ 945	\$2,646.00
2/24/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails and calls with MAVNIs, team emails/tasking, preparation of filings/declarations, and communications with common interest counsel.	9.9	\$ 1,025	\$10,147.50
2/25/2018	Baruch, Douglas W.	Address amended complaint and status.	1.5	\$ 1,350	\$2,025.00
2/25/2018	Gogadze, Helene	Call with a MAVNI regarding "derogatory" N-426; legal research/drafting in response to Government arguments.	2.2	\$ 960	\$2,112.00
2/25/2018	McNamara, Brendan	Phone calls with MAVNI soldiers; prepare declarations.	5.8	\$ 315	\$1,827.00
2/25/2018	Raol, Neaha	Nio class declarations and correspondence re: same.	1.0	\$ 945	\$945.00
2/25/2018	Stachniak Kaplan, Kayla	Prepare motion for preliminary injunction; review background materials.	2.1	\$ 960	\$2,016.00
2/25/2018	Szlarb, Natalia	Prepare for conference calls; conference call with Nio class members; draft and review declarations of Nio class members; communications with Nio class members.	5.6	\$ 545	\$3,052.00
2/25/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs, team emails/tasking, preparation of filings/declarations, and communications with common interest counsel.	11.1	\$ 1,025	\$11,377.50
2/26/2018	Baruch, Douglas W.	Address amended complaint and PI theories.	1.5	\$ 1,350	\$2,025.00
2/26/2018	Beary, Webster	Prepare DOJ email; communicate with MAVNIs; review MAVNI materials.	1.2	\$ 860	\$1,032.00
2/26/2018	Gogadze, Helene	Legal research/drafting in response to Government arguments.	8.4	\$ 960	\$8,064.00
2/26/2018	LoBue, Joseph J.	Conference call with MAVNI soldiers regarding declarations in support of preliminary injunction motion; draft Third Amended Complaint.	5.3	\$ 1,240	\$6,572.00
2/26/2018	McNamara, Brendan	Conduct legal research on various issues for motion for reconsideration; prepare drafts of MAVNI declarations.	7.1	\$ 315	\$2,236.50
2/26/2018	Raol, Neaha	Review/revise draft declarations; confer with team re: same.	1.3	\$ 945	\$1,228.50
2/26/2018	Stachniak Kaplan, Kayla	Prepare preliminary injunction brief; review background materials.	4.2	\$ 960	\$4,032.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
2/26/2018	Szlarb, Natalia	Prepare for conference calls; conference call with Nio class members; draft and review declarations of Nio class members; communications with Nio class members.	5.4	\$ 545	\$2,943.00
2/26/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs and others and email to DOJ.	2.3	\$ 1,025	\$2,357.50
2/26/2018	Woods, Elizabeth	Prepare declarations for members of Nio class; coordinate telephone conferences with class members regarding preparation of declarations; telephone conference with class members regarding preparation of declarations.	3.6	\$ 545	\$1,962.00
2/27/2018	Baruch, Douglas W.	Address amended complaint and PI.	1.8	\$ 1,350	\$2,430.00
2/27/2018	Beary, Webster	Review MAVNI materials; respond to MAVNIs; compile email to DOJ.	1.9	\$ 860	\$1,634.00
2/27/2018	Gogadze, Helene	Legal research and analysis for the opposition to Government arguments.	9.7	\$ 960	\$9,312.00
2/27/2018	LoBue, Joseph J.	Conference calls with MAVNI soldiers regarding declarations in support of preliminary injunction; meeting with team regarding preliminary injunction motion; draft Third Amended Complaint.	4.8	\$ 1,240	\$5,952.00
2/27/2018	McNamara, Brendan	Conduct legal research on various issues for motion for reconsideration; prepare drafts of MAVNI declarations.	4.1	\$ 315	\$1,291.50
2/27/2018	Stachniak Kaplan, Kayla	Discuss case with D. Baruch, J. LoBue, J. Wollenberg, and S. Gates; prepare preliminary injunction brief; review background material.	5.5	\$ 960	\$5,280.00
2/27/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members.	3.4	\$ 545	\$1,853.00
2/27/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs and common interest counsel, plus discussions with team members.	6.5	\$ 1,025	\$6,662.50
2/27/2018	Woods, Elizabeth	Prepare declarations for members of Nio class; telephone conference with class members regarding preparation of declarations.	3.1	\$ 545	\$1,689.50
2/28/2018	Baruch, Douglas W.	Analyze DOJ filings and strategy re same.	1.3	\$ 1,350	\$1,755.00
2/28/2018	Beary, Webster	Review MAVNI materials; respond to MAVNIs; compile email to DOJ; draft declarations; discuss case with J. Wollenberg.	7.3	\$ 860	\$6,278.00
2/28/2018	Gates, Shaun	Research in support of TRO/PI motion re: security clearances.	3.8	\$ 785	\$2,983.00
2/28/2018	Gogadze, Helene	Team meeting and discussion; draft opposition to Government arguments.	9.7	\$ 960	\$9,312.00
2/28/2018	LoBue, Joseph J.	Review Government bi-weekly reporting; review Government declarations relating to reporting requirements; review materials in support of Third Amended Complaint; draft Third Amended Complaint.	5.4	\$ 1,240	\$6,696.00
2/28/2018	McNamara, Brendan	Conduct legal research on various issues for motion for reconsideration; prepare drafts of MAVNI declarations.	4.9	\$ 315	\$1,543.50
2/28/2018	Raol, Neaha	Review USG filings/status update.	0.5	\$ 945	\$472.50
2/28/2018	Stachniak Kaplan, Kayla	Prepare motion for preliminary injunction.	3.0	\$ 960	\$2,880.00
2/28/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members.	7.2	\$ 545	\$3,924.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/1/2018	Baruch, Douglas W.	Team meeting and research.	1.4	\$ 1,350	\$1,890.00
3/1/2018	Beary, Webster	Team meeting; discuss case with J. Wollenberg.	1.5	\$ 860	\$1,290.00
3/1/2018	Gates, Shaun	Review Nio filings re status of DoD investigations; research for preliminary injunction; draft preliminary injunction.	5.9	\$ 785	\$4,631.50
3/1/2018	Gogadze, Helene	Draft opposition to Government arguments; team discussions.	8.0	\$ 960	\$7,680.00
3/1/2018	LoBue, Joseph J.	Review additional reporting ordered by the Court; review, edit declarations in support of preliminary injunction motion; draft third Amended Complaint.	6.4	\$ 1,240	\$7,936.00
3/1/2018	McNamara, Brendan	Conduct legal research on various issues for motion for reconsideration; prepare drafts of MAVNI declarations.	4.3	\$ 315	\$1,354.50
3/1/2018	Raol, Neaha	Conferences with MAVNIs; review/revise draft declaration; email correspondence with other MAVNIs re: same; review administrative record.	1.4	\$ 945	\$1,323.00
3/1/2018	St. Romain, Kate	Updates to MAVNI litigation website; prepare emails to MAVNI clients regarding litigation updates; email common interest counsel regarding MAVNI litigation updates; email plaintiff's immigration counsel regarding plaintiff background checks and litigation updates.	1.1	\$ 730	\$803.00
3/1/2018	Stachniak Kaplan, Kayla	Discuss case with team members; prepare preliminary injunction motion.	6.5	\$ 960	\$6,240.00
3/1/2018	Wollenberg, Jennifer	Address MAVNI issues and tasks, including emails/discussions with MAVNIs and common interest counsel, team meeting, and assessment of administrative record index and other materials filed by Government.	11.1	\$ 1,025	\$11,377.50
3/2/2018	Beary, Webster	Edit declaration; review MAVNI materials; correspond with MAVNIs.	3.0	\$ 860	\$2,580.00
3/2/2018	Gates, Shaun	Research for preliminary injunction; draft preliminary injunction.	7.9	\$ 785	\$6,201.50
3/2/2018	Gogadze, Helene	Draft opposition to Government arguments; team discussions re status, strategy.	8.0	\$ 960	\$7,680.00
3/2/2018	LoBue, Joseph J.	Review materials in support of Third Amended Complaint; draft Third Amended Complaint.	7.2	\$ 1,240	\$8,928.00
3/2/2018	McNamara, Brendan	Conduct legal research on various issues for motion for reconsideration; prepare drafts of MAVNI declarations.	5.2	\$ 315	\$1,638.00
3/2/2018	Raol, Neaha	Confer/correspondence with class members; update/finalize draft declaration; review filings/reconsideration motion arguments/status update.	2.4	\$ 945	\$2,268.00
3/2/2018	Stachniak Kaplan, Kayla	Prepare preliminary injunction motion.	1.7	\$ 960	\$1,632.00
3/2/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members.	3.4	\$ 545	\$1,853.00
3/2/2018	Wollenberg, Jennifer	Address MAVNI issues and tasks, including discussions with MAVNIs and common interest counsel, discussions with team members, and preparation of declarations and other materials for upcoming filings.	10.9	\$ 1,025	\$11,172.50
3/2/2018	Woods, Elizabeth	Prepare and send correspondence with members of the Nio class; prepare draft declarations for members of the Nio class.	1.1	\$ 545	\$599.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/3/2018	Gates, Shaun	Draft preliminary injunction memorandum; review correspondence re: the same.	8.5	\$ 785	\$6,672.50
3/3/2018	Raol, Neaha	Review declarations/class member follow-up; confer with team re: same.	1.2	\$ 945	\$1,134.00
3/3/2018	Stachniak Kaplan, Kayla	Prepare preliminary injunction motion; discuss case with J. Wollenberg.	8.2	\$ 960	\$7,872.00
3/3/2018	Wollenberg, Jennifer	Address MAVNI issues, including emails with MAVNIs and common interest counsel.	3.0	\$ 1,025	\$3,075.00
3/3/2018	Woods, Elizabeth	Prepare and send correspondence with members of the Nio class; prepare draft declarations for members of the Nio class.	0.8	\$ 545	\$436.00
3/4/2018	Gogadze, Helene	Review and edit opposition to Government arguments; email to team.	7.0	\$ 960	\$6,720.00
3/4/2018	St. Romain, Kate	Email class members regarding unredacted background check information.	0.3	\$ 730	\$219.00
3/4/2018	Stachniak Kaplan, Kayla	Prepare preliminary injunction motion.	7.4	\$ 960	\$7,104.00
3/4/2018	Wollenberg, Jennifer	Address MAVNI issues, including emails with MAVNIs, common interest counsel, and team members.	3.9	\$ 1,025	\$3,997.50
3/5/2018	Baruch, Douglas W.	Address administrative record and reporting motion.	3.5	\$ 1,350	\$4,725.00
3/5/2018	Beary, Webster	Compile demonstrative exhibit; correspond with MAVNI soldiers; review MAVNI materials.	7.9	\$ 860	\$6,794.00
3/5/2018	Gates, Shaun	Review and redact declarations of preliminary injunction.	3.5	\$ 785	\$2,747.50
3/5/2018	Gogadze, Helene	Draft opposition to Government arguments; legal research and analysis.	8.6	\$ 960	\$8,256.00
3/5/2018	LoBue, Joseph J.	Draft Third Amended Complaint; review, edit declarations in support of preliminary injunction motion.	7.2	\$ 1,240	\$8,928.00
3/5/2018	Raol, Neaha	Confer with various Nio class members; email correspondence re: same; review news articles re: MAVNIs/class action; confer with team members, including J. Wollenberg, B. McNamara re: status of declarations.	2.1	\$ 945	\$1,984.50
3/5/2018	St. Romain, Kate	Draft plaintiffs section of third amended complaint.	0.4	\$ 730	\$292.00
3/5/2018	Stachniak Kaplan, Kayla	Legal research regarding final agency action; develop facts for PI motion.	1.2	\$ 960	\$1,152.00
3/5/2018	Szlarb, Natalia	Draft and review declarations of Nio class members; communications with Nio class members.	3.3	\$ 545	\$1,798.50
3/5/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including MAVNI and common interest discussions, preparation of upcoming filings, and discussions with team members.	8.2	\$ 1,025	\$8,405.00
3/6/2018	Baruch, Douglas W.	Address protective order and response motion.	6.5	\$ 1,350	\$8,775.00
3/6/2018	Baruch, Douglas W.	Address reconsideration opposition and status.	1.8	\$ 1,350	\$2,430.00
3/6/2018	Beary, Webster	Review MAVNI materials; correspond with MAVNIS; draft declarations; compile DOJ email.	5.5	\$ 860	\$4,730.00
3/6/2018	Gogadze, Helene	Draft opposition to Government arguments; legal research and analysis for the opposition.	6.6	\$ 960	\$6,336.00
3/6/2018	LoBue, Joseph J.	Draft Third Amended Complaint; review, edit declarations in support of preliminary injunction Motion.	6.6	\$ 1,240	\$8,184.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/6/2018	McNamara, Brendan	Conduct legal research; review, edit, and cite check opposition to motion for reconsideration.	7.1	\$ 315	\$2,236.50
3/6/2018	Raol, Neaha	Confer with Nio class members.	0.8	\$ 945	\$756.00
3/6/2018	St. Romain, Kate	Supplement and edit Third Amended Complaint sections regarding named plaintiffs; email J. Wollenberg and J. LoBue regarding Third Amended Complaint edits; draft email response to plaintiff.	2.1	\$ 730	\$1,533.00
3/6/2018	Stachniak Kaplan, Kayla	Review and incorporate declarations into PI motion.	1.4	\$ 960	\$1,344.00
3/6/2018	Szlarb, Natalia	Communications with Nio class members; review past filings.	5.1	\$ 545	\$2,779.50
3/6/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including discussions with MAVNIs and common interest counsel, preparation of upcoming filings (including response to court order), and internal team discussions.	9.5	\$ 1,025	\$9,737.50
3/7/2018	Baruch, Douglas W.	Brief re reporting; address protective order; address PI briefing and strategy.	4.5	\$ 1,350	\$6,075.00
3/7/2018	Beary, Webster	Prepare exhibit for amended complaint.	6.7	\$ 860	\$5,762.00
3/7/2018	LoBue, Joseph J.	Review, edit Reply brief in support of Motion for Court-ordered reporting; draft Third Amended Complaint.	5.8	\$ 1,240	\$7,192.00
3/7/2018	McNamara, Brendan	Conduct legal research; review, edit, and cite check opposition to motion for reconsideration.	5.1	\$ 315	\$1,606.50
3/7/2018	Raol, Neaha	Review response to court's order; confer with various Nio class members; review DOD unredacted list of MAVNIs cleared and confer with J. Wollenberg, W. Beary, and correspond with K. St. Romain re: same; review update from Nio class members re: naturalization oath and ceremony.	2.0	\$ 945	\$1,890.00
3/7/2018	St. Romain, Kate	Edit opposition to Plaintiffs' briefing regarding reporting times; research and email J. Wollenberg regarding instances where Arendt discusses September 2016 policy.	1.7	\$ 730	\$1,241.00
3/7/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary and Jennifer Wollenberg regarding individual MAVNIs.	4.4	\$ 545	\$2,398.00
3/7/2018	Wollenberg, Jennifer	Address MAVNI issues, including discussions with MAVNIs, preparation of declarations and upcoming filings, internal team discussions, and emails with DOJ.	6.9	\$ 1,025	\$7,072.50
3/8/2018	Baruch, Douglas W.	Address protective order and PI brief; team strategy meeting.	7.0	\$ 1,350	\$9,450.00
3/8/2018	Beary, Webster	Prepare exhibit for amended complaint; edit declaration; discuss case with J. Wollenberg.	6.0	\$ 860	\$5,160.00
3/8/2018	Gogadze, Helene	Work on drafting motion for leave to amend complaint in Nio action; legal research and analysis for the motion; legal research for APA claims for the amended complaint; legal research for administrative record arguments; team discussions.	9.2	\$ 960	\$8,832.00
3/8/2018	LoBue, Joseph J.	Review, edit draft Protective Order; draft Third Amended Complaint; review Administrative Record.	7.5	\$ 1,240	\$9,300.00
3/8/2018	McNamara, Brendan	Review information related to MAVNI soldiers' background checks; create summary for W. Beary.	4.5	\$ 315	\$1,417.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
3/8/2018	St. Romain, Kate	Call with class action client regarding completed DOD enhanced background checks; emails to J. Wollenberg and N. Raol regarding unredacted Attachment A; email MAVNI class member regarding unredacted Attachment A; coordinate supplements to MAVNI litigation website.	0.6	\$ 730	\$438.00
3/8/2018	Stachniak Kaplan, Kayla	Review proposed Third Amended Complaint.	1.1	\$ 960	\$1,056.00
3/8/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary and Jennifer Wollenberg regarding individual MAVNIs.	3.6	\$ 545	\$1,962.00
3/8/2018	Wollenberg, Jennifer	Address MAVNI issues and questions; prepare upcoming filings including declarations; review and comment on protective order; emails with DOJ counsel.	12.1	\$ 1,025	\$12,402.50
3/9/2018	Baruch, Douglas W.	Meetings re strategy and PI brief; revise TAC; address PO.	4.5	\$ 1,350	\$6,075.00
3/9/2018	Beary, Webster	Prepare exhibit for amended complaint; discuss case with J. Wollenberg; review MAVNI emails.	4.3	\$ 860	\$3,698.00
3/9/2018	Gates, Shaun	Internal correspondence re: MAVNIs omitted from government reporting.	0.3	\$ 785	\$235.50
3/9/2018	Gogadze, Helene	Draft motion for leave to amend complaint in Nio action; legal research and analysis for the motion; team meeting and discussion.	8.8	\$ 960	\$8,448.00
3/9/2018	LoBue, Joseph J.	Review Administrative Record; draft Preliminary Injunction Motion.	7.2	\$ 1,240	\$8,928.00
3/9/2018	McNamara, Brendan	Address declarations for W. Beary.	0.8	\$ 315	\$252.00
3/9/2018	Raol, Neaha	Confer with various Nio class members; review magistrate judge order and confer with team re: same; review articles and pull/review SDFla docket for case filed by Nio class member; review update from class member re: successful naturalization; confer with team members; review draft amended complaint.	2.5	\$ 945	\$2,362.50
3/9/2018	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; legal research regarding 706(1) TRAC factors; discuss case with D. Baruch, J. LoBue, and J. Wollenberg; prepare motion for preliminary injunction.	3.8	\$ 960	\$3,648.00
3/9/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary and Jennifer Wollenberg regarding individual MAVNIs.	2.9	\$ 545	\$1,580.50
3/9/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including preparation of upcoming filings, discussions with MAVNIs and common interest counsel, and internal team discussions.	7.5	\$ 1,025	\$7,687.50
3/10/2018	Baruch, Douglas W.	Edits and revisions to TAC.	4.0	\$ 1,350	\$5,400.00
3/10/2018	Gates, Shaun	Research equitable estoppel for preliminary injunction.	2.0	\$ 785	\$1,570.00
3/10/2018	Gogadze, Helene	Draft motion for leave to amend complaint in Nio action.	7.0	\$ 960	\$6,720.00
3/10/2018	Stachniak Kaplan, Kayla	Prepare motion for preliminary injunction.	4.8	\$ 960	\$4,608.00
3/10/2018	Wollenberg, Jennifer	Prepare materials for PI motion; emails/calls with MAVNIs, common interest counsel, and team members re MAVNI issues/concerns.	13.7	\$ 1,025	\$14,042.50
3/11/2018	Baruch, Douglas W.	Edits and revisions to TAC; edits and revisions to PI brief.	4.0	\$ 1,350	\$5,400.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/11/2018	Gates, Shaun	Research re equitable estoppel.	0.8	\$ 785	\$628.00
3/11/2018	Gogadze, Helene	Draft motion for leave to amend complaint in Nio action.	6.0	\$ 960	\$5,760.00
3/11/2018	Wollenberg, Jennifer	Emails with team members re research, draft PI motion, and other tasks.	0.8	\$ 1,025	\$820.00
3/12/2018	Baruch, Douglas W.	Prepare for meet and confer; call with DOJ; correspondence with DOJ; address PO and upcoming motions.	7.5	\$ 1,350	\$10,125.00
3/12/2018	Baruch, Douglas W.	Edits and revisions to TAC; edits and revisions to PI brief.	4.0	\$ 1,350	\$5,400.00
3/12/2018	Beary, Webster	Team meeting; meet and confer with DOJ; prepare exhibits.	3.6	\$ 860	\$3,096.00
3/12/2018	Gogadze, Helene	Research and analysis for motion for leave to amend complaint and motion for preliminary injunction.	7.3	\$ 960	\$7,008.00
3/12/2018	LoBue, Joseph J.	Conference call with Government regarding outstanding issues; review research for preliminary injunction motion; draft preliminary injunction motion.	7.2	\$ 1,240	\$8,928.00
3/12/2018	McNamara, Brendan	Discussion of MAVNI soldiers shipping to basic training; draft emails with instructions to soldiers shipping to basic training.	0.7	\$ 315	\$220.50
3/12/2018	Raol, Neaha	Confer and follow-up with Nio class members; J. Wollenberg re: same.	2.2	\$ 945	\$2,079.00
3/12/2018	Stachniak Kaplan, Kayla	Discuss case with J. LoBue, D. Baruch, J. Wollenberg, and W. Beary; meet-and-confer regarding TRO/PI issues; discuss case with J. Wollenberg.	2.0	\$ 960	\$1,920.00
3/12/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary regarding individual MAVNIs.	2.8	\$ 545	\$1,526.00
3/12/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs, common interest counsel, and team members; prepare amended complaint; meet and confer with defense counsel.	3.6	\$ 1,025	\$3,690.00
3/13/2018	Baruch, Douglas W.	Address PO negotiation; address MTA, TAC, and PI motions.	6.5	\$ 1,350	\$8,775.00
3/13/2018	Beary, Webster	Review PI; prepare exhibits for PI.	6.4	\$ 860	\$5,504.00
3/13/2018	Gates, Shaun	Review and revise motion for leave to file third amended complaint and related filings.	7.3	\$ 785	\$5,730.50
3/13/2018	Gogadze, Helene	Draft motion for leave to file amended complaint; research and editing for the motion.	8.8	\$ 960	\$8,448.00
3/13/2018	LoBue, Joseph J.	Review research for preliminary injunction motion; draft preliminary injunction motion.	7.9	\$ 1,240	\$9,796.00
3/13/2018	St. Romain, Kate	Call with MAVNI class member; research transcript portions regarding continuation of MAVNI program.	0.4	\$ 730	\$292.00
3/13/2018	Stachniak Kaplan, Kayla	Prepare exhibits for PI motion; prepare PI motion and proposed order.	2.0	\$ 960	\$1,920.00
3/13/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary regarding individual MAVNIs; review past MAVNI filings.	4.1	\$ 545	\$2,234.50
3/13/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns.	4.9	\$ 1,025	\$5,022.50
3/14/2018	Baruch, Douglas W.	Finalize Third Amended Complaint and Motion for Leave to Amend; address Protective Order motion.	4.8	\$ 1,350	\$6,480.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
3/14/2018	Beary, Webster	Review PI; prepare exhibits for PI; correspond with MAVNIs.	5.1	\$ 860	\$4,386.00
3/14/2018	Gogadze, Helene	Finalize and file motion for leave to amend complaint.	9.8	\$ 960	\$9,408.00
3/14/2018	LoBue, Joseph J.	Review research for preliminary injunction motion; draft preliminary injunction motion.	7.3	\$ 1,240	\$9,052.00
3/14/2018	McNamara, Brendan	Review, edit and cite check motion for leave to amend the complaint.	2.7	\$ 315	\$850.50
3/14/2018	Raol, Neaha	Review amended complaint; correspondence/confer with various Nio class members; confer with J. Wollenberg re: same.	2.1	\$ 945	\$1,984.50
3/14/2018	St. Romain, Kate	Review edits to complaint regarding named plaintiffs; email named plaintiffs regarding outstanding questions for complaint; email D. Baruch regarding class certification order; call J. Wollenberg regarding complaint.	1.2	\$ 730	\$876.00
3/14/2018	Stachniak Kaplan, Kayla	Prepare PI exhibits.	0.2	\$ 960	\$192.00
3/14/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary and Jennifer Wollenberg regarding individual MAVNIs.	4.8	\$ 545	\$2,616.00
3/14/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including Third Amended Complaint filing.	12.4	\$ 1,025	\$12,710.00
3/15/2018	Baruch, Douglas W.	Address PI Motion papers.	5.5	\$ 1,350	\$7,425.00
3/15/2018	Beary, Webster	Review PI; prepare exhibits for PI; correspond with MAVNIs; draft declaration.	7.0	\$ 860	\$6,020.00
3/15/2018	Gogadze, Helene	Research for preliminary injunction motion.	7.0	\$ 960	\$6,720.00
3/15/2018	Hinnant, H. Coleman	Cite check case law in Nio memo of law in support of motion for TRO or PI (J. Wollenberg).	6.0	\$ 275	\$1,650.00
3/15/2018	LoBue, Joseph J.	Draft preliminary injunction motion.	8.0	\$ 1,240	\$9,920.00
3/15/2018	Raol, Neaha	Confer with Nio class members; review various papers filed by DOJ.	2.5	\$ 945	\$2,362.50
3/15/2018	St. Romain, Kate	Coordinate additions to MAVNI litigation website; address preliminary injunction exhibits and memo.	5.3	\$ 730	\$3,869.00
3/15/2018	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg.	0.2	\$ 960	\$192.00
3/15/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary regarding individual MAVNIs.	3.6	\$ 545	\$1,962.00
3/15/2018	Wollenberg, Jennifer	Work on filings for MAVNI litigation, including PI/TRO materials; discussions with MAVNIs, joint defense counsel, and team re MAVNI issues/concerns.	12.6	\$ 1,025	\$12,915.00
3/16/2018	Baruch, Douglas W.	Edits and revisions to PI motion.	4.5	\$ 1,350	\$6,075.00
3/16/2018	Beary, Webster	Draft and edit preliminary injunction; prepare exhibits for filing; correspond with MAVNIS; discuss filing with J. Wollenberg.	14.8	\$ 860	\$12,728.00
3/16/2018	Gogadze, Helene	Research and editing for the preliminary injunction motion; research and drafting for Reply on motion for leave to amend complaint.	13.0	\$ 960	\$12,480.00
3/16/2018	Hinnant, H. Coleman	Shepardize case law in Nio memo of law in support of motion for TRO or PI (J. Wollenberg).	4.0	\$ 275	\$1,100.00
3/16/2018	LoBue, Joseph J.	Draft preliminary injunction motion.	7.4	\$ 1,240	\$9,176.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
3/16/2018	McNamara, Brendan	Prepare documents and exhibits for preliminary injunction and TRO filing.	2.8	\$ 315	\$882.00
3/16/2018	Raol, Neaha	Review/revise preliminary injunction papers and assist with filing; confer with team re: same.	4.6	\$ 945	\$4,347.00
3/16/2018	St. Romain, Kate	Edit preliminary injunction memorandum; edit preliminary injunction proposed order; draft and edit preliminary injunction motion; research pre-processing of MAVNI USCIS application for J. Wollenberg and email J. Wollenberg; edit J. Wollenberg declaration for preliminary injunction.	9.0	\$ 730	\$6,570.00
3/16/2018	Stachniak Kaplan, Kayla	Prepare PI motion and exhibits.	1.5	\$ 960	\$1,440.00
3/16/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary and Jennifer Wollenberg regarding individual MAVNIs; review and edit exhibits.	5.2	\$ 545	\$2,834.00
3/16/2018	Wollenberg, Jennifer	Prepare PI/TRO motion and attachments; emails re plaintiff; email with common interest counsel re discharged MAVNI.	16.3	\$ 1,025	\$16,707.50
3/17/2018	Baruch, Douglas W.	Address reply brief re MTA.	1.5	\$ 1,350	\$2,025.00
3/17/2018	Gogadze, Helene	Draft reply in support of motion for leave to amend complaint.	4.5	\$ 960	\$4,320.00
3/17/2018	Wollenberg, Jennifer	Address follow-up from PI filing; discussion with team members re reply in support of leave to amend complaint.	4.2	\$ 1,025	\$4,305.00
3/18/2018	Gogadze, Helene	Draft reply in support of motion for leave to amend complaint; legal research for the reply brief.	9.5	\$ 960	\$9,120.00
3/18/2018	Wollenberg, Jennifer	Follow-up from Friday's filing; emails with team members re draft reply in support of motion to amend; emails with common interest counsel.	1.2	\$ 1,025	\$1,230.00
3/19/2018	Baruch, Douglas W.	Drafting and revising reply brief in support of motion to amend; strategy meetings.	7.0	\$ 1,350	\$9,450.00
3/19/2018	Beary, Webster	Review summary judgment filing; review preliminary injunction filing; discuss case with J. Wollenberg.	3.6	\$ 860	\$3,096.00
3/19/2018	LoBue, Joseph J.	Prepare for March 21 hearing.	4.1	\$ 1,240	\$5,084.00
3/19/2018	Raol, Neaha	Review updates/status.	0.2	\$ 945	\$189.00
3/19/2018	St. Romain, Kate	Supplements to MAVNI litigation website; email K. Grisez regarding Chinese MAVNI documents; plans for telephone conference with J. Huvelle chambers; prepare email to clients, common interest counsel regarding litigation updates.	1.5	\$ 730	\$1,095.00
3/19/2018	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; prepare outline for preliminary injunction hearing.	1.7	\$ 960	\$1,632.00
3/19/2018	Szlarb, Natalia	Respond to Nio class members communications; conference calls with Web Beary and Jennifer Wollenberg regarding individual MAVNIs; review past filings.	4.3	\$ 545	\$2,343.50
3/19/2018	Wollenberg, Jennifer	Follow-up from last week's filings in Nio, including courtesy copies; prepare drafts for this week's filings; discussions with team; discussions with MAVNIs.	7.2	\$ 1,025	\$7,380.00
3/20/2018	Baruch, Douglas W.	Edits and revisions to reply brief; address status and strategy.	4.0	\$ 1,350	\$5,400.00
3/20/2018	Beary, Webster	Assist with response motion; discuss with J. Wollenberg.	3.6	\$ 860	\$3,096.00
3/20/2018	Gates, Shaun	Review reply to opposition to motion for leave to amend.	0.3	\$ 785	\$235.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/20/2018	Hinnant, H. Coleman	Cite check case law in Nio memo of law in Nio reply memo; identify cases for review.	3.5	\$ 275	\$962.50
3/20/2018	LoBue, Joseph J.	Prepare for March 21 hearing.	4.2	\$ 1,240	\$5,208.00
3/20/2018	St. Romain, Kate	Draft email response to clients; email K. Kaplan regarding call with Court; review emails regarding plaintiff naturalization.	0.3	\$ 730	\$219.00
3/20/2018	Stachniak Kaplan, Kayla	Prepare preliminary injunction hearing outline.	0.6	\$ 960	\$576.00
3/20/2018	Szlarb, Natalia	Respond to Nio class members communications.	3.8	\$ 545	\$2,071.00
3/20/2018	Wollenberg, Jennifer	Review and revise reply in support of third amended complaint; address other filings due this week; emails/conversations with MAVNIs and common interest counsel; discussions with team members.	11.4	\$ 1,025	\$11,685.00
3/21/2018	Baruch, Douglas W.	Address PI Motion and Response to declarations; address status.	5.5	\$ 1,350	\$7,425.00
3/21/2018	Beary, Webster	Review filing and news article.	1.0	\$ 860	\$860.00
3/21/2018	McNamara, Brendan	Review pleadings, transcripts, declarations, and other documents for discussion of certain information and that the case is limited to the administrative record; prepare outline for J. Wollenberg.	7.2	\$ 315	\$2,268.00
3/21/2018	Raol, Neaha	Confer with MAVNIs, K. Grisez re: requests; review filings.	0.5	\$ 945	\$472.50
3/21/2018	St. Romain, Kate	Additions to the MAVNI litigation website; read MAVNI litigation articles regarding preliminary injunction; respond to MAVNI client emails; prepare emails to clients regarding MAVNI litigation update.	1.0	\$ 730	\$730.00
3/21/2018	Szlarb, Natalia	Respond to Nio class members communications.	1.2	\$ 545	\$654.00
3/21/2018	Wollenberg, Jennifer	Prepare upcoming filings; team discussions; emails/discussions with MAVNIs and common interest counsel.	10.5	\$ 1,025	\$10,762.50
3/22/2018	Baruch, Douglas W.	Finalize opposition to reply brief re motion to amend; address DOJ correspondence and SJ motion.	6.5	\$ 1,350	\$8,775.00
3/22/2018	Beary, Webster	Update MAVNI tracker spreadsheet; review MAVNI correspondence; create exhibits; discuss case with J. Wollenberg and N. Szlarb.	5.0	\$ 860	\$4,300.00
3/22/2018	LoBue, Joseph J.	Edit reply to DOJ submission on reporting requirements; review DOJ motion for summary judgment; review legal research for opposition to motion for summary judgment.	2.4	\$ 1,240	\$2,976.00
3/22/2018	McNamara, Brendan	Review pleadings, transcripts, declarations, and other documents for discussion of certain information and that the case is limited to the administrative record; prepare outline for J. Wollenberg.	3.2	\$ 315	\$1,008.00
3/22/2018	St. Romain, Kate	Preparation of PI briefing for Court; prepare exhibits for opposition to protective order; supplements to MAVNI litigation website.	1.2	\$ 730	\$876.00
3/22/2018	Szlarb, Natalia	Respond to Nio class members communications; conference call with Webster Beary; update the table with details of the Nio class members.	4.1	\$ 545	\$2,234.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/22/2018	Wollenberg, Jennifer	Emails/discussions with MAVNIs and common interest counsel re issues/concerns/updates; team discussions re projects, strategy, and status; prepare upcoming filings, including response re reporting declarations; prepare file requested by Court.	11.3	\$ 1,025	\$11,582.50
3/23/2018	Baruch, Douglas W.	Draft PO opposition; prepare for hearing; review case law re CAR.	6.0	\$ 1,350	\$8,100.00
3/23/2018	Beary, Webster	Update MAVNI spreadsheet; prepare exhibits; correspond with MAVNIs; QC Nio inbox; discuss QC with J. Wollenberg.	4.6	\$ 860	\$3,956.00
3/23/2018	LoBue, Joseph J.	Review legal research for opposition to motion for summary judgment; draft outline for opposition to summary judgment.	3.5	\$ 1,240	\$4,340.00
3/23/2018	Raol, Neaha	Review papers filed re: amended complaint; confer/correspondence with Nio class members.	1.0	\$ 945	\$945.00
3/23/2018	St. Romain, Kate	Telephone conference with N. Szlarb and class member regarding litigation; calls with S. Gates and J. Wollenberg regarding MAVNI class list	0.7	\$ 730	\$511.00
3/23/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	6.6	\$ 545	\$3,597.00
3/23/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails and calls with MAVNIs and common interest counsel; discussions with team members; preparation for upcoming conference and filing.	9.0	\$ 1,025	\$9,225.00
3/24/2018	Wollenberg, Jennifer	Emails from MAVNI concerning naturalization interview scheduling.	0.3	\$ 1,025	\$307.50
3/25/2018	Wollenberg, Jennifer	Emails from common interest counsel and MAVNIs concerning MAVNI issues/concerns; review and comment on draft response to additional Government declarations re reporting burden.	5.2	\$ 1,025	\$5,330.00
3/26/2018	Baruch, Douglas W.	Edits and revisions to PO opposition; confer with team; conference call and follow-up.	5.8	\$ 1,350	\$7,830.00
3/26/2018	Beary, Webster	Teleconference with Court; correspond with MAVNIs; update MAVNI tracker.	3.3	\$ 860	\$2,838.00
3/26/2018	Gates, Shaun	Teleconference with the court re: preliminary injunction; team meeting re the same.	1.6	\$ 785	\$1,256.00
3/26/2018	Gogadze, Helene	Internal discussions and teleconference with a MAVNI.	1.0	\$ 960	\$960.00
3/26/2018	LoBue, Joseph J.	Review, edit opposition for Government Motion for protective order; prepare for conference call with Court; conference call with Court.	5.3	\$ 1,240	\$6,572.00
3/26/2018	McNamara, Brendan	Meeting with J. Wollenberg to discuss responding to Nio inbox and maintain the tracker.	1.2	\$ 315	\$378.00
3/26/2018	Raol, Neaha	Status conference with court; confer with Nio class members; review updates/filings.	2.9	\$ 945	\$2,740.50
3/26/2018	St. Romain, Kate	Attend telephone conference with J. Huvelle chambers, defense counsel and team; prepare analysis of class lists; email common interest counsel regarding court deadlines.	3.5	\$ 730	\$2,555.00
3/26/2018	Stachniak Kaplan, Kayla	Prepare outline for preliminary injunction hearing.	0.4	\$ 960	\$384.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/26/2018	Wollenberg, Jennifer	Emails/calls with MAVNIs and common interest counsel; prepare today's filing; prepare for today's scheduling conference and attend scheduling conference; team meeting.	11.3	\$ 1,025	\$11,582.50
3/27/2018	Baruch, Douglas W.	Address pending motions and research.	7.5	\$ 1,350	\$10,125.00
3/27/2018	Beary, Webster	Correspond with MAVNIs; review MAVNI related emails; team meeting to discuss tracker; update and QC tracker.	5.1	\$ 860	\$4,386.00
3/27/2018	Gates, Shaun	Research re: USCIS annual meeting.	0.9	\$ 785	\$706.50
3/27/2018	Gogadze, Helene	Team discussion and legal research on APA argument and administrative record.	4.0	\$ 960	\$3,840.00
3/27/2018	LoBue, Joseph J.	Review legal research regarding supplementation of administrative record.	3.5	\$ 1,240	\$4,340.00
3/27/2018	McNamara, Brendan	Review and respond to emails in MAVNI inbox; maintain tracker.	0.6	\$ 315	\$189.00
3/27/2018	Raol, Neaha	Follow-up re: USCIS ombudsman conference; confer with S. Gates re: same; follow-up info for MAVNI re: individual lawsuit.	0.5	\$ 945	\$472.50
3/27/2018	St. Romain, Kate	Review Tiwari documents; meeting with B. McNamara, W. Beary and J. Wollenberg regarding Nio inbox responses; additions to MAVNI litigation website; call with J. Wollenberg regarding Nio inbox; email and call J. Wollenberg regarding class list analysis and amended complaint comparisons.	2.3	\$ 730	\$1,679.00
3/27/2018	St. Romain, Kate	Review Tiwari documents; meeting with B. McNamara, W. Beary and J. Wollenberg regarding Nio inbox responses; coordinate additions to MAVNI litigation website.	2.3	\$ 730	\$1,679.00
3/27/2018	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; case management; prepare PI hearing outline.	0.4	\$ 960	\$384.00
3/27/2018	Wollenberg, Jennifer	MAVNI calls/emails; meet with team members re Nio mailbox and issue tracking; address upcoming filings/projects.	8.0	\$ 1,025	\$8,200.00
3/28/2018	Baruch, Douglas W.	Address pending motions and CAR research.	4.7	\$ 1,350	\$6,345.00
3/28/2018	Gogadze, Helene	Legal research on APA argument and administrative record.	1.5	\$ 960	\$1,440.00
3/28/2018	LoBue, Joseph J.	Review legal research for supplementation of the administrative record; review materials for supplementation of the administrative record; meeting with team regarding case status and action items.	4.1	\$ 1,240	\$5,084.00
3/28/2018	McNamara, Brendan	Review and respond to emails in MAVNI inbox; maintain tracker.	1.0	\$ 315	\$315.00
3/28/2018	Raol, Neaha	Follow-up re: solicitation; confer with team, common interest counsel.	0.7	\$ 945	\$661.50
3/28/2018	St. Romain, Kate	Review status report; respond to Nio inbox emails.	0.4	\$ 730	\$292.00
3/28/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including calls/emails with MAVNIs; strategy discussion with J. Lobue and D. Baruch re administrative record and other items; prepare amended complaint comparison filing.	10.7	\$ 1,025	\$10,967.50
3/29/2018	Baruch, Douglas W.	Address pending motions and correspondence; research.	5.5	\$ 1,350	\$7,425.00
3/29/2018	LoBue, Joseph J.	Review supplemental administrative record produced by Government.	3.5	\$ 1,240	\$4,340.00
3/29/2018	McNamara, Brendan	Respond to emails in MAVNI inbox; discuss issues with K. St. Romain; update tracker.	1.9	\$ 315	\$598.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/29/2018	St. Romain, Kate	Class list analysis; call with J. LoBue regarding Nio exhibits; address Nio USCIS administrative record; respond to Nio inbox emails; review litigation hold policy and email to counsel regarding litigation hold.	1.6	\$ 730	\$1,168.00
3/29/2018	Wollenberg, Jennifer	Emails concerning MAVNIs issues and class list.	0.5	\$ 1,025	\$512.50
3/30/2018	Baruch, Douglas W.	Address pending motions and correspondence with DOJ.	3.1	\$ 1,350	\$4,185.00
3/30/2018	Gogadze, Helene	Legal research on APA argument and administrative record.	2.0	\$ 960	\$1,920.00
3/30/2018	LoBue, Joseph J.	Draft motion to supplement the administrative record.	2.2	\$ 1,240	\$2,728.00
3/30/2018	McNamara, Brendan	Respond to emails in MAVNI inbox; discuss issues with K. St. Romain; update tracker.	1.1	\$ 315	\$346.50
3/30/2018	Raol, Neaha	Conferences with multiple Nio class members.	1.5	\$ 945	\$1,417.50
3/30/2018	St. Romain, Kate	Draft email responses to shipping Nio class members; respond to Nio inbox emails; call with B. McNamara regarding Nio inbox emails; email clients regarding MAVNI litigation updates.	0.9	\$ 730	\$657.00
3/30/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including MAVNI emails.	0.6	\$ 1,025	\$615.00
3/31/2018	McNamara, Brendan	Respond to emails in MAVNI inbox; update tracker.	0.6	\$ 315	\$189.00
3/31/2018	St. Romain, Kate	Respond to Nio inbox emails; email B. McNamara and J. Wollenberg regarding Nio inbox emails; call with plaintiff regarding weekly status report.	1.4	\$ 730	\$1,022.00
3/31/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including emails with MAVNIs and team members.	1.6	\$ 1,025	\$1,640.00
4/1/2018	Gogadze, Helene	Legal research on APA argument and administrative record.	3.0	\$ 960	\$2,880.00
4/1/2018	McNamara, Brendan	Respond to MAVNI soldiers' emails in the Nio inbox.	0.9	\$ 315	\$283.50
4/2/2018	Baruch, Douglas W.	Meeting to address upcoming briefs; research re CAR motion and PI reply; emails and strategy.	6.5	\$ 1,350	\$8,775.00
4/2/2018	Gogadze, Helene	Internal team discussions; legal research on administrative record and related issues.	9.4	\$ 960	\$9,024.00
4/2/2018	LoBue, Joseph J.	Meeting with team regarding case status and action items; review legal research for motion to supplement administrative record; draft outline for motion to supplement administrative record.	7.2	\$ 1,240	\$8,928.00
4/2/2018	McNamara, Brendan	Respond to emails and address concerns raised by MAVNI soldiers.	2.2	\$ 315	\$693.00
4/2/2018	St. Romain, Kate	Email regarding Nio class inbox.	0.2	\$ 730	\$146.00
4/2/2018	Szlarb, Natalia	Respond to Nio class members communications; research cases where plaintiffs successfully supplemented administrative record.	4.4	\$ 545	\$2,398.00
4/2/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including updates from MAVNIs, common interest counsel, and internal team members; email to DOJ re named Plaintiff; internal meeting re admin record and other issues.	5.4	\$ 1,025	\$5,535.00
4/3/2018	Baruch, Douglas W.	Review and address opposition to PI motion; address CAR motion.	6.8	\$ 1,350	\$9,180.00
4/3/2018	Gates, Shaun	Review government's reporting data; meeting to discuss reply in support of preliminary injunction.	2.1	\$ 785	\$1,648.50
4/3/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record; internal team meetings and discussions.	9.6	\$ 960	\$9,216.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
4/3/2018	LoBue, Joseph J.	Review Government opposition to preliminary injunction motion and supporting materials; draft outline for Reply brief.	7.3	\$ 1,240	\$9,052.00
4/3/2018	McNamara, Brendan	Respond to emails in Nio inbox and address MAVNI soldiers' issues regarding naturalization.	3.1	\$ 315	\$976.50
4/3/2018	Raol, Neaha	Review various DOJ filings; team meeting; review cases cited in DOJ PI opposition brief; confer/correspondence with Nio class members.	3.0	\$ 945	\$2,835.00
4/3/2018	St. Romain, Kate	Coordinate edits to MAVNI litigation website; email common interest counsel regarding Defendant filings; email clients regarding Defendants filings and preliminary injunction hearing.	0.6	\$ 730	\$438.00
4/3/2018	Stachniak Kaplan, Kayla	Prepare Reply in support of PI Motion; discuss case with team members.	5.7	\$ 960	\$5,472.00
4/3/2018	Wollenberg, Jennifer	Respond to MAVNIs, common interest counsel, and internal team members; review PI Opposition and draft Reply sections; team meeting re PI Reply; begin drafting Reply.	10.9	\$ 1,025	\$11,172.50
4/4/2018	Baruch, Douglas W.	Meet and confer with DOJ re CAR; address DOJ filings; address client and counsel emails; address PI reply brief.	5.8	\$ 1,350	\$7,830.00
4/4/2018	Gates, Shaun	Review government's opposition to preliminary injunction and draft response.	3.3	\$ 785	\$2,590.50
4/4/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record; teleconference with opposing counsel; internal team discussions.	9.5	\$ 960	\$9,120.00
4/4/2018	LoBue, Joseph J.	Draft Reply brief to Preliminary Injunction Motion.	7.4	\$ 1,240	\$9,176.00
4/4/2018	McNamara, Brendan	Conduct legislative history research for J. Wollenberg.	2.8	\$ 315	\$882.00
4/4/2018	Raol, Neaha	Confer with various team members; draft/revise portion of PI reply brief; review cases cited by DOJ.	6.7	\$ 945	\$6,331.50
4/4/2018	St. Romain, Kate	Call class member regarding status of litigation; email client regarding oath ceremony; email B. McNamara and N. Szlarb regarding Nio inbox shipping soldier; email J. Wollenberg and S. Gates regarding MAVNIs on class list; respond to Nio Class Counsel emails; coordinate edits to MAVNI Litigation website; statutory research for PI reply motion and email B. McNamara regarding the same.	2.3	\$ 730	\$1,679.00
4/4/2018	Stachniak Kaplan, Kayla	Prepare Reply in support of PI Motion; discuss case with J. Wollenberg.	7.4	\$ 960	\$7,104.00
4/4/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	1.3	\$ 545	\$708.50
4/4/2018	Wollenberg, Jennifer	Address MAVNI questions/concerns; discussions with common interest counsel and internal team members; prepare PI Reply sections; meet and confer re July 7 Policy admin record; address Norfolk field office issues.	13.5	\$ 1,025	\$13,837.50
4/5/2018	Baruch, Douglas W.	Address PI reply brief and CAR motion; email to DOJ re CAR position.	3.0	\$ 1,350	\$4,050.00
4/5/2018	Gates, Shaun	Revise reply in support of preliminary injunction.	1.6	\$ 785	\$1,256.00
4/5/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record.	9.2	\$ 960	\$8,832.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
4/5/2018	Hinnant, H. Coleman	Proofread and cite check Nio reply memo (J. Wollenberg).	3.0	\$ 275	\$825.00
4/5/2018	LoBue, Joseph J.	Draft Reply brief in support of preliminary injunction motion.	7.6	\$ 1,240	\$9,424.00
4/5/2018	McNamara, Brendan	Respond to emails of MAVNI soldiers and address concerns regarding naturalization.	1.4	\$ 315	\$441.00
4/5/2018	Raol, Neaha	Conferences/correspondence with Nio class members; draft section of PI reply brief; conferences with D. Baruch, J. Wollenberg re: same.	5.2	\$ 945	\$4,914.00
4/5/2018	St. Romain, Kate	Respond to Nio inbox emails.	0.4	\$ 730	\$292.00
4/5/2018	Stachniak Kaplan, Kayla	Prepare Reply in support of PI Motion; discuss case with J. Wollenberg.	1.8	\$ 960	\$1,728.00
4/5/2018	Wollenberg, Jennifer	Address emails/discussions with MAVNIs, common interest counsel, and internal team; prepare PI Reply.	17.1	\$ 1,025	\$17,527.50
4/6/2018	Baruch, Douglas W.	Address PI reply brief; address CAR motion; meet and confer with DOJ; calls and emails.	5.8	\$ 1,350	\$7,830.00
4/6/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record; teleconference with opposing counsel; internal team discussions.	9.7	\$ 960	\$9,312.00
4/6/2018	Hinnant, H. Coleman	Proofread and cite check Nio reply memo (J. Wollenberg).	5.0	\$ 275	\$1,375.00
4/6/2018	LoBue, Joseph J.	Draft, edit Reply brief in support of preliminary injunction motion; conference call with Government regarding supplementation of the record.	5.7	\$ 1,240	\$7,068.00
4/6/2018	McNamara, Brendan	Respond to emails of MAVNI soldiers and address concerns regarding naturalization.	1.2	\$ 315	\$378.00
4/6/2018	Raol, Neaha	Review/revise/finalize PI reply brief for filing.	2.9	\$ 945	\$2,740.50
4/6/2018	St. Romain, Kate	Edit reply in support of preliminary injunction; meet with J. Wollenberg regarding class list analysis; coordinate edits to MAVNI litigation website; email B. McNamara regarding Nio inbox responses; email clients regarding reply in support of preliminary injunction; address class list analysis.	4.6	\$ 730	\$3,358.00
4/6/2018	Stachniak Kaplan, Kayla	Prepare Reply in support of PI Motion.	2.1	\$ 960	\$2,016.00
4/6/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	1.1	\$ 545	\$599.50
4/6/2018	Wollenberg, Jennifer	Prepare PI Reply brief; discussions with MAVNIs, common interest counsel, and team members.	14.5	\$ 1,025	\$14,862.50
4/7/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record.	2.5	\$ 960	\$2,400.00
4/7/2018	McNamara, Brendan	Respond to emails of MAVNI soldiers and address concerns regarding naturalization.	0.3	\$ 315	\$94.50
4/7/2018	Wollenberg, Jennifer	Emails with team, MAVNIs, and common interest counsel re MAVNI issues/concerns/status.	1.8	\$ 1,025	\$1,845.00
4/8/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record.	1.6	\$ 960	\$1,536.00
4/8/2018	Wollenberg, Jennifer	Emails with team members and MAVNIs re issues/concerns; review/revise memo regarding record supplementation.	4.6	\$ 1,025	\$4,715.00
4/9/2018	Baruch, Douglas W.	Research and motion re CAR.	7.5	\$ 1,350	\$10,125.00
4/9/2018	Gates, Shaun	Review questions from court in preparation for hearing.	0.2	\$ 785	\$157.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
4/9/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record; legal research for the motion; internal discussions regarding the motion and legal support.	9.8	\$ 960	\$9,408.00
4/9/2018	Hinnant, H. Coleman	Proofread and cite check Nio reply memo regarding interpretation of USCIS certified administrative record (J. Wollenberg).	7.5	\$ 275	\$2,062.50
4/9/2018	LoBue, Joseph J.	Draft, edit Motion to Supplement the record.	5.2	\$ 1,240	\$6,448.00
4/9/2018	McNamara, Brendan	Meet with J. Wollenberg to discuss issues related to Nio filings; respond to MAVNI soldiers' substantive emails regarding pending naturalization applications.	4.0	\$ 315	\$1,260.00
4/9/2018	Raol, Neaha	Confer with Nio class members; review/respond to email correspondence from class members and confer with J. Wollenberg, B. McNamara re: same; review questions from court; follow-up re: new counsel for MAVNI case; review articles.	2.4	\$ 945	\$2,268.00
4/9/2018	St. Romain, Kate	Address communications with plaintiff; email B. McNamara regarding Nio inbox; call J. Wollenberg regarding court questions to defense counsel; coordinate edits to MAVNI Litigation website; email plaintiff regarding hearing; email MAVNI regarding ship date; review plaintiff materials.	0.9	\$ 730	\$657.00
4/9/2018	Stachniak Kaplan, Kayla	Prepare PI hearing outline.	3.9	\$ 960	\$3,744.00
4/9/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	3.9	\$ 545	\$2,125.50
4/9/2018	Wollenberg, Jennifer	Address issue with filed declarations; emails/discussions with MAVNIs and common interest counsel re MAVNI issues and concerns; revise and draft motion/memo re supplementation of record.	13.7	\$ 1,025	\$14,042.50
4/10/2018	Baruch, Douglas W.	Finalize motion re CAR; prepare for hearing; DOJ correspondence.	7.0	\$ 1,350	\$9,450.00
4/10/2018	Gates, Shaun	Prepare for hearing on preliminary injunction and team meeting re: the same.	2.5	\$ 785	\$1,962.50
4/10/2018	Gogadze, Helene	Work on draft motion regarding USCIS Administrative Record; legal research for the motion; internal discussions regarding the motion and legal support; finalize and file the motion.	9.6	\$ 960	\$9,216.00
4/10/2018	Hinnant, H. Coleman	Proofread and cite check Nio reply memo regarding interpretation of USCIS certified administrative record (J. Wollenberg).	4.5	\$ 275	\$1,237.50
4/10/2018	LoBue, Joseph J.	Review questions form the Court; prepare for preliminary injunction hearing.	5.5	\$ 1,240	\$6,820.00
4/10/2018	McNamara, Brendan	Attend MAVNI meeting; respond to soldier's emails regarding their naturalization applications.	4.6	\$ 315	\$1,449.00
4/10/2018	Raol, Neaha	Confer with Nio class members; team meeting re: 4/11 hearing; confer with J. Wollenberg re: same; prepare/review hard copy material and email correspondence with team re: same; review DOJ filing; respond/confer with C. Hinnant re: Kirwa/Nio brief cites.	3.2	\$ 945	\$3,024.00
4/10/2018	St. Romain, Kate	Attend team meeting regarding preparation for hearing; prepare documents for hearing; email N. Raol regarding hearing materials.	2.3	\$ 730	\$1,679.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
4/10/2018	Stachniak Kaplan, Kayla	Review motion to supplement administrative record; discuss case with team members.	2.0	\$ 960	\$1,920.00
4/10/2018	Wollenberg, Jennifer	Finalize and file motion to supplement record; prep for tomorrow's hearing, including team meeting re same; discussions with MAVNIs and common interest counsel.	14.9	\$ 1,025	\$15,272.50
4/11/2018	Baruch, Douglas W.	PI hearing, prep, and follow-up.	7.5	\$ 1,350	\$10,125.00
4/11/2018	Raol, Neaha	Follow-up re: solicitation; confer with team, common interest counsel.	5.4	\$ 945	\$5,103.00
4/11/2018	St. Romain, Kate	Prepare documents for PI hearing; research citations for Defendants reports; email and meet with J. Wollenberg regarding citations and documents for hearing; attend pre-hearing team meeting; attend preliminary injunction hearing; attend preliminary injunction hearing de-briefing; review status report; email plaintiff regarding status report; email B. McNamara and N. Szlarb regarding Nio inbox.	8.0	\$ 730	\$5,840.00
4/11/2018	Stachniak Kaplan, Kayla	Attend PI hearing; discuss case with team members.	5.9	\$ 960	\$5,664.00
4/11/2018	Wollenberg, Jennifer	Prepare for today's hearing; attend today's hearing; follow-on team meeting and other follow-up from hearing.	8.0	\$ 1,025	\$8,200.00
4/12/2018	Baruch, Douglas W.	Strategy discussions and address reconsideration.	2.5	\$ 1,350	\$3,375.00
4/12/2018	LoBue, Joseph J.	Review research for motion for reconsideration.	1.7	\$ 1,240	\$2,108.00
4/12/2018	McNamara, Brendan	Respond to soldiers' emails in Nio inbox.	0.6	\$ 315	\$189.00
4/12/2018	St. Romain, Kate	Coordinate supplements to MAVNI Litigation website.	0.2	\$ 730	\$146.00
4/12/2018	Stachniak Kaplan, Kayla	Review PI order.	0.2	\$ 960	\$192.00
4/12/2018	Wollenberg, Jennifer	Discussions with MAVNIs and common interest counsel re MAVNI issues/concerns; emails and discussions with team members re upcoming projects/tasks.	6.9	\$ 1,025	\$7,072.50
4/13/2018	Baruch, Douglas W.	Address strategy.	2.0	\$ 1,350	\$2,700.00
4/13/2018	Raol, Neaha	Follow-up re: solicitation; confer with team, common interest counsel.	1.2	\$ 945	\$1,134.00
4/13/2018	St. Romain, Kate	Prepare emails to named clients regarding hearing and resulting order; call with J. Wollenberg regarding emails to named clients; email common interest counsel regarding hearings and resulting order; review email from common interest counsel regarding order.	0.9	\$ 730	\$657.00
4/13/2018	Wollenberg, Jennifer	Discussions with MAVNIs and common interest counsel re updates/issues/concerns; discussions with team members re MAVNI responses and upcoming projects.	3.2	\$ 1,025	\$3,280.00
4/14/2018	McNamara, Brendan	Respond to soldiers' emails in Nio inbox regarding USCIS and pending applications.	1.0	\$ 315	\$315.00
4/14/2018	Wollenberg, Jennifer	Emails with team members and MAVNIs re MAVNI issues/concerns/status.	1.3	\$ 1,025	\$1,332.50
4/15/2018	Wollenberg, Jennifer	Emails with team member re MAVNI concerns.	0.2	\$ 1,025	\$205.00
4/16/2018	Baruch, Douglas W.	Review and address related case documentation and strategy.	2.5	\$ 1,350	\$3,375.00
4/16/2018	LoBue, Joseph J.	Review legal research for motion for reconsideration.	1.3	\$ 1,240	\$1,612.00
4/16/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization sent to Nio inbox.	0.6	\$ 315	\$189.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
4/16/2018	Raol, Neaha	Confer with MAVNIs re: update/status; review MAVNI correspondence; review Tiwari update/material.	5.1	\$ 945	\$4,819.50
4/16/2018	St. Romain, Kate	Email J. Wollenberg regarding class lists; meeting regarding class lists; email J. Wollenberg and J. LoBue regarding motion for reconsideration.	0.2	\$ 730	\$146.00
4/16/2018	Stachniak Kaplan, Kayla	Analyze Tiwari documents; discuss case with B. McNamara.	1.1	\$ 960	\$1,056.00
4/16/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and internal team; review materials from common interest counsel.	5.9	\$ 1,025	\$6,047.50
4/17/2018	Baruch, Douglas W.	Review related case documents; address strategy.	4.5	\$ 1,350	\$6,075.00
4/17/2018	LoBue, Joseph J.	Draft outline for motion for reconsideration; review research for motion for reconsideration; meeting with J. Wollenberg and K. St. Romain regarding motion for reconsideration.	2.6	\$ 1,240	\$3,224.00
4/17/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization in the Nio inbox; chart progress in tracker.	1.1	\$ 315	\$346.50
4/17/2018	Raol, Neaha	Correspondence with class members, FF team re: status/updates.	1.1	\$ 945	\$1,039.50
4/17/2018	St. Romain, Kate	Email J. Wollenberg and J. LoBue regarding motion for reconsideration; meet with J. Wollenberg and J. LoBue regarding motion for reconsideration; meet with J. Wollenberg, S. Gates and B. McNamara regarding class lists and exhibits; class list projects.	1.3	\$ 730	\$949.00
4/17/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and team members; internal meeting re potential reconsideration motion.	2.6	\$ 1,025	\$2,665.00
4/18/2018	Baruch, Douglas W.	Review related case documents.	2.0	\$ 1,350	\$2,700.00
4/18/2018	LoBue, Joseph J.	Draft motion for reconsideration.	6.4	\$ 1,240	\$7,936.00
4/18/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization; meet with J. Wollenberg to discuss class lists and finding soldiers left off the government's lists.	3.0	\$ 315	\$945.00
4/18/2018	Raol, Neaha	MAVNI correspondence.	0.4	\$ 945	\$378.00
4/18/2018	St. Romain, Kate	Class lists projects; draft motion for reconsideration "serving" section; email B. McNamara and N. Szlarb regarding the Nio inbox.	2.0	\$ 730	\$1,460.00
4/18/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including discussions with MAVNIs and common interest counsel.	3.5	\$ 1,025	\$3,587.50
4/19/2018	Baruch, Douglas W.	Review Wagafe information and address strategy.	1.5	\$ 1,350	\$2,025.00
4/19/2018	Hinnant, H. Coleman	Analysis re individual names from MAVNI class list (K. St. Romain).	4.5	\$ 275	\$1,237.50
4/19/2018	LoBue, Joseph J.	Draft motion for reconsideration.	3.7	\$ 1,240	\$4,588.00
4/19/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization; track down soldiers missing from class list.	1.3	\$ 315	\$409.50
4/19/2018	St. Romain, Kate	Class list project; draft motion for reconsideration "serving" section.	1.4	\$ 730	\$1,022.00
4/19/2018	Wollenberg, Jennifer	Emails/discussions re MAVNI issues/concerns with MAVNIs, common interest counsel, and internal team members; discuss magistrate inquiry.	2.1	\$ 1,025	\$2,152.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
4/20/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization in the Nio inbox.	0.8	\$ 315	\$252.00
4/20/2018	Raol, Neaha	Review press re: MAVNI case; review court order.	0.8	\$ 945	\$756.00
4/20/2018	St. Romain, Kate	Email B. McNamara regarding missing class members list; email B. McNamara and N. Szlard regarding Nio inbox; draft motion for reconsideration "serving" section.	2.5	\$ 730	\$1,825.00
4/20/2018	Wollenberg, Jennifer	Discussions re MAVNI issues/concerns, including calls/emails from MAVNIs.	0.8	\$ 1,025	\$820.00
4/21/2018	Wollenberg, Jennifer	Emails with common interest counsel, team members, and MAVNIs re issues/concerns/updates.	0.5	\$ 1,025	\$512.50
4/22/2018	Baruch, Douglas W.	Address strategy and DOJ correspondence.	0.9	\$ 1,350	\$1,215.00
4/22/2018	Wollenberg, Jennifer	Draft proposed briefing schedule and discuss same with D. Baruch and J. LoBue.	0.8	\$ 1,025	\$820.00
4/23/2018	Baruch, Douglas W.	Address DOJ correspondence and briefing schedule.	0.8	\$ 1,350	\$1,080.00
4/23/2018	LoBue, Joseph J.	Review research for motion for reconsideration; draft motion for reconsideration.	4.4	\$ 1,240	\$5,456.00
4/23/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization in Nio inbox.	0.7	\$ 315	\$220.50
4/23/2018	Raol, Neaha	Review tracker, confer with B. McNamara, review and correspondence with class members; confer with J. Wollenberg; review filing.	3.4	\$ 945	\$3,213.00
4/23/2018	St. Romain, Kate	Email J. Wollenberg regarding Defense counsel's response re class member inquiries; email plaintiff regarding Defense counsel inquiry response; email B. McNamara and N. Szlarb regarding Nio inbox.	0.5	\$ 730	\$365.00
4/23/2018	Wollenberg, Jennifer	Emails with MAVNIs and team members regarding MAVNI issues/concerns/updates; prepare, discuss, and file joint proposed briefing schedule.	7.3	\$ 1,025	\$7,482.50
4/24/2018	McNamara, Brendan	Respond to emails from MAVNI soldiers regarding the naturalization process.	0.6	\$ 315	\$189.00
4/24/2018	Raol, Neaha	Confer/correspondence with class members.	0.8	\$ 945	\$756.00
4/24/2018	St. Romain, Kate	Meet with and email S. Gates regarding class lists.	0.2	\$ 730	\$146.00
4/24/2018	Wollenberg, Jennifer	Discussions with MAVNIs, team members, and common interest counsel re MAVNI issues/concerns/updates.	5.6	\$ 1,025	\$5,740.00
4/25/2018	Baruch, Douglas W.	Address upcoming hearing and meeting re strategy.	2.0	\$ 1,350	\$2,700.00
4/25/2018	LoBue, Joseph J.	Draft motion for reconsideration; review Government reporting to Court.	1.2	\$ 1,240	\$1,488.00
4/25/2018	McNamara, Brendan	Meet with C. Hinnant and K. St. Romain to discuss project to capture "lost" MAVNI soldiers; respond to soldiers' emails regarding naturalization.	5.2	\$ 315	\$1,638.00
4/25/2018	Raol, Neaha	Team meeting re: next steps/strategy; review weekly reporting by government; confer with Nio class members; confer with J. Wollenberg re: case.	2.4	\$ 945	\$2,268.00
4/25/2018	St. Romain, Kate	Email B. McNamara regarding Nio inbox; meet with B. McNamra and C. Hinnant regarding class list comparison; email clients regarding MAVNI status report; email plaintiff and team regarding naturalization.	0.9	\$ 730	\$657.00
4/25/2018	Wollenberg, Jennifer	Emails/discussions with common interest counsel, MAVNIs, and team members re MAVNI issues/concerns/updates; review weekly reporting; team meeting re next steps/strategy.	9.6	\$ 1,025	\$9,840.00
4/26/2018	Baruch, Douglas W.	Address strategy and confer with team.	2.2	\$ 1,350	\$2,970.00
4/26/2018	Gogadze, Helene	Legal research and analysis for MSSD arguments, administrative record and discovery.	3.0	\$ 960	\$2,880.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
4/26/2018	LoBue, Joseph J.	Draft motion for reconsideration.	1.8	\$ 1,240	\$2,232.00
4/26/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.8	\$ 315	\$882.00
4/26/2018	Raol, Neaha	Correspondence re: Nio class communications; confer with Nio class member; review DDC/DC Circuit discovery decisions; confer with J. Wollenberg, H. Gogadze re: same; review common interest counsel correspondence; review news/articles and circulate articles of interest to team.	3.5	\$ 945	\$3,307.50
4/26/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including discussions with MAVNIs, team members, and common interest counsel; review research findings re discovery-related issues.	6.8	\$ 1,025	\$6,970.00
4/27/2018	Baruch, Douglas W.	Address reconsideration and status.	1.2	\$ 1,350	\$1,620.00
4/27/2018	Gogadze, Helene	Legal research and analysis for MSSD arguments, administrative record and discovery.	9.7	\$ 960	\$9,312.00
4/27/2018	LoBue, Joseph J.	Draft motion for reconsideration.	2.2	\$ 1,240	\$2,728.00
4/27/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update DOJ tracker.	4.6	\$ 315	\$1,449.00
4/27/2018	St. Romain, Kate	Call with J. Wollenberg; calendar conference with magistrate judge.	0.2	\$ 730	\$146.00
4/27/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and internal team members.	4.8	\$ 1,025	\$4,920.00
4/28/2018	Wollenberg, Jennifer	Emails from common interest counsel.	0.3	\$ 1,025	\$307.50
4/29/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	1.7	\$ 545	\$926.50
4/29/2018	Wollenberg, Jennifer	Emails with common interest counsel, MAVNIs, and internal team members re status of and problems with MAVNI naturalizations.	1.2	\$ 1,025	\$1,230.00
4/30/2018	Baruch, Douglas W.	Prepare for call with Magistrate Judge; telephonic conference and follow up.	2.5	\$ 1,350	\$3,375.00
4/30/2018	Gogadze, Helene	Legal research and analysis for MSSD arguments, administrative record and discovery.	8.6	\$ 960	\$8,256.00
4/30/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; update DOJ tracker.	1.9	\$ 315	\$598.50
4/30/2018	Raol, Neaha	Confer with Nio class member; review Nio class member correspondence and docket entries; confer with J. Wollenberg re: call with magistrate judge and next steps.	3.1	\$ 945	\$2,929.50
4/30/2018	St. Romain, Kate	Attend team meeting regarding conference with magistrate judge; attend telephone conference with defense counsel, team and magistrate judge; draft "serving" section of motion for reconsideration; email team regarding telephone conference with magistrate judge.	3.3	\$ 730	\$2,409.00
4/30/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	0.5	\$ 545	\$272.50
4/30/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including calls and emails with MAVNIs, common interest counsel; discussions with internal team members; emails to government counsel; prepare for and attend teleconference in front of magistrate.	14.4	\$ 1,025	\$14,760.00
5/1/2018	Baruch, Douglas W.	Address DOJ and class correspondence.	2.2	\$ 1,350	\$2,970.00
5/1/2018	Gogadze, Helene	Research on constitutional claims and supporting information.	7.0	\$ 960	\$6,720.00
5/1/2018	LoBue, Joseph J.	Draft motion for consideration.	1.5	\$ 1,240	\$1,860.00
5/1/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00

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5/1/2018	St. Romain, Kate	Coordinate supplement to MAVNI litigation website; review magistrate judge's minute order regarding Defendant's tasks; coordinate calendar invitation for status conference with magistrate judge.	0.3	\$ 730	\$219.00
5/1/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including discussions with MAVNIs, common interest counsel, and internal team members.	4.1	\$ 1,025	\$4,202.50
5/2/2018	Baruch, Douglas W.	Address DOJ correspondence.	1.0	\$ 1,350	\$1,350.00
5/2/2018	Gogadze, Helene	Research re constitutional claims.	7.0	\$ 960	\$6,720.00
5/2/2018	LoBue, Joseph J.	Review legal research regarding discovery issues.	0.9	\$ 1,240	\$1,116.00
5/2/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.3	\$ 315	\$724.50
5/2/2018	St. Romain, Kate	Address class list project; email J. Wollenberg and B. McNamara regarding list of soldiers with favorable adjudications; research Judge Huvelle decisions regarding privilege logs.	3.6	\$ 730	\$2,628.00
5/2/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and team members re MAVNI issues/concerns/other; emails re research for upcoming motion.	3.2	\$ 1,025	\$3,280.00
5/3/2018	Gogadze, Helene	Research for constitutional claims and analysis of supporting information.	4.0	\$ 960	\$3,840.00
5/3/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update tracker.	2.2	\$ 315	\$693.00
5/3/2018	St. Romain, Kate	Email N. Szlarb and B. McNamara regarding Nio inbox; email and call C. Hinnant, B. McNamara, and J. Wollenberg regarding Nio class members missing from Attachment A; research D.C. Circuit cases regarding privilege logs; email J. Wollenberg regarding privilege log APA cases; coordinate call with J. Wollenberg regarding privilege log research and class list issues.	2.7	\$ 730	\$1,971.00
5/3/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	0.9	\$ 545	\$490.50
5/3/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and internal team members re MAVNI issues/concerns/etc.	6.2	\$ 1,025	\$6,355.00
5/4/2018	Baruch, Douglas W.	Address CAR filing, correspondence with DOJ, and strategy.	1.5	\$ 1,350	\$2,025.00
5/4/2018	Gogadze, Helene	Research on constitutional claims and supporting information.	7.0	\$ 960	\$6,720.00
5/4/2018	LoBue, Joseph J.	Review legal research on discovery issues.	0.5	\$ 1,240	\$620.00
5/4/2018	Raol, Neaha	Confer with MAVNIs, H. Gogadze re: research; confer with J. Wollenberg; review Wagafe discovery filings.	1.6	\$ 945	\$1,512.00
5/4/2018	St. Romain, Kate	Meet with J. Wollenberg regarding privilege log research and class list issues; compile information regarding MAVNI soldiers shipping in May and email J. Wollenberg information; follow-up with Nio soldiers regarding naturalization interviews and ship dates; meet with N. Szlarb regarding Nio mailbox; perform audit of Nio inbox and chart information on master MAVNI chart.	4.7	\$ 730	\$3,431.00
5/4/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	3.8	\$ 545	\$2,071.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/4/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and team members re MAVNI issues/concerns; emails to DOJ; meetings with H. Gogadze and K. St. Romain re research projects.	9.4	\$ 1,025	\$9,635.00
5/5/2018	Wollenberg, Jennifer	Emails with common interest counsel.	0.3	\$ 1,025	\$307.50
5/6/2018	St. Romain, Kate	Research legal standard for attorney-client privilege and waiver; email J. Wollenberg summary of research.	1.5	\$ 730	\$1,095.00
5/6/2018	Wollenberg, Jennifer	Draft motion re USCIS CAR at 7; emails with internal team members, MAVNIs, and common interest counsel.	6.5	\$ 1,025	\$6,662.50
5/7/2018	Baruch, Douglas W.	Edits and revisions to CAR motion; correspondence with DOJ.	2.8	\$ 1,350	\$3,780.00
5/7/2018	Gogadze, Helene	Research and analysis regarding constitutional claims; preparation of the documents needed for MSSD claims.	5.0	\$ 960	\$4,800.00
5/7/2018	Hinnant, H. Coleman	Proofread and cite check Nio motion (J. Wollenberg).	4.0	\$ 275	\$1,100.00
5/7/2018	LoBue, Joseph J.	Draft and edit motion regarding privilege issues; conference call with counsel in related case regarding discovery issues.	4.6	\$ 1,240	\$5,704.00
5/7/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update tracker.	5.1	\$ 315	\$1,606.50
5/7/2018	Raol, Neaha	Correspondence with various class members; confer with team re: various matters.	2.5	\$ 945	\$2,362.50
5/7/2018	St. Romain, Kate	Respond to emails in the Nio inbox and email fast approaching shippers; chart soldier information; draft email to DOJ for J. Wollenberg regarding soldiers shipping in May; call with J. Wollenberg regarding Ex. A comparison; coordinate Ex. A comparison with C. Hinnant; edit memorandum and motion regarding USCIS CAR redactions.	2.6	\$ 730	\$1,898.00
5/7/2018	Wollenberg, Jennifer	Revise and file motion concerning USCIS CAR at 7; discussions with MAVNIs, common interest counsel, and internal team members re MAVNI issues/concerns/etc; emails to DOJ re MAVNIs.	10.2	\$ 1,025	\$10,455.00
5/8/2018	Baruch, Douglas W.	Address Rand Report and DOJ correspondence.	3.4	\$ 1,350	\$4,590.00
5/8/2018	Gogadze, Helene	Research and analysis regarding constitutional claims; preparation of the documents needed for MSSD claims.	7.0	\$ 960	\$6,720.00
5/8/2018	LoBue, Joseph J.	Review legal research on discovery and administrative record issues.	4.4	\$ 1,240	\$5,456.00
5/8/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update tracker.	2.4	\$ 315	\$756.00
5/8/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and internal team members re issues/updates/concerns; draft emails to DOJ re issues; verify MAVNIs as "missing" from class list.	10.9	\$ 1,025	\$11,172.50
5/9/2018	Baruch, Douglas W.	Address DOJ correspondence and reporting.	2.2	\$ 1,350	\$2,970.00
5/9/2018	Hinnant, H. Coleman	Analysis of Government report and internal MAVNI list and spreadsheet (J. Wollenberg).	5.5	\$ 275	\$1,512.50
5/9/2018	LoBue, Joseph J.	Review court-ordered Government reporting; review legal research for administrative record and discovery issues; review Rand Report on MAVNI program.	5.4	\$ 1,240	\$6,696.00
5/9/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update trackers.	5.6	\$ 315	\$1,764.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
5/9/2018	Raol, Neaha	Conference with various class members; review class-wide reports filed by DOJ; review reports filed for named plaintiffs; confer/correspond with various team members re: same (J. Wollenberg, D. Baruch, B. McNamara).	1.7	\$ 945	\$1,606.50
5/9/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, and internal team members re MAVNI issues/concerns/updates; draft emails to DOJ; assess Government May 9 Reporting.	11.4	\$ 1,025	\$11,685.00
5/10/2018	Baruch, Douglas W.	Address DOJ correspondence and reports and strategy.	2.5	\$ 1,350	\$3,375.00
5/10/2018	Gogadze, Helene	Research and analysis regarding constitutional claims; preparation of the documents needed for MSSD claims.	4.0	\$ 960	\$3,840.00
5/10/2018	Hinnant, H. Coleman	Analysis re Government reports and internal tracking (J. Wollenberg).	5.0	\$ 275	\$1,375.00
5/10/2018	LoBue, Joseph J.	Conference call with common interest counsel regarding MAVNI issues; review Rand report.	2.5	\$ 1,240	\$3,100.00
5/10/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update trackers.	7.4	\$ 315	\$2,331.00
5/10/2018	Raol, Neaha	Team conference with J. Wollenberg, S. Gates, B. McNamara, K. St. Romain, N. Szlarb re: next steps/strategy; review DOJ May 9 reports; confer with J. Wollenberg and K. St. Romain, B. McNamara, S. Gates re: May 9 report data; conferences/correspondence with various class members; draft/revise emails to DOJ.	8.7	\$ 945	\$8,221.50
5/10/2018	St. Romain, Kate	Address class list project; meet with J. Wollenberg, N. Raol, B. McNamara and S. Gates regarding next steps based on MAVNI reporting; email clients regarding bi-weekly and class reporting; supplement MAVNI litigation website with class reporting; coordinate with B. McNamara to email and chart all "suitable" MAVNIs; email and chart "A" suitable MAVNIs; email B. McNamara regarding client ship dates; respond to MAVNI emails in the Nio inbox.	4.1	\$ 730	\$2,993.00
5/10/2018	Szlarb, Natalia	Team meeting; draft an email to DOJ	1.8	\$ 545	\$981.00
5/10/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and internal team members; team meeting re follow-up to May 9 reporting; call with common interest counsel re MAVNI issue.	13.9	\$ 1,025	\$14,247.50
5/11/2018	Baruch, Douglas W.	Address DOJ proposal and correspondence; strategy re hearing prep.	2.0	\$ 1,350	\$2,700.00
5/11/2018	Gogadze, Helene	Research and analysis regarding constitutional claims.	7.0	\$ 960	\$6,720.00
5/11/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update trackers.	4.8	\$ 315	\$1,512.00
5/11/2018	Raol, Neaha	Review/analyze DOJ May 9 reports; conferences with J. Wollenberg, K. St. Romain re: same; confer with various class; members (email correspondence and teleconferences); confer with H. Gogadze re: administrative record documents; draft emails to DOJ.	7.2	\$ 945	\$6,804.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/11/2018	St. Romain, Kate	Address check in with interviewed MAVNIs; email and chart "A" suitable MAVNIs; email B. McNamara regarding client ship dates and MAVNI chart information; respond to MAVNI emails in the Nio inbox; draft and edit emails to DOJ regarding shipping MAVNIs; coordinate with N. Raol and B. McNamara regarding responding to suitable MAVNIs.	4.9	\$ 730	\$3,577.00
5/11/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including calls/emails with MAVNIs, discussions with internal team members, and discussions with common interest counsel; emails to DOJ re issues.	10.5	\$ 1,025	\$10,762.50
5/12/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and update trackers.	0.7	\$ 315	\$220.50
5/12/2018	St. Romain, Kate	Review discharged MAVNI survey response and email J. Wollenberg regarding the same; coordinate call with "unsuitable" MAVNI; email B. McNamara regarding Nio inbox responses; address class list.	0.3	\$ 730	\$219.00
5/13/2018	Baruch, Douglas W.	Review correspondence and draft response to DOJ proposal.	1.0	\$ 1,350	\$1,350.00
5/13/2018	Wollenberg, Jennifer	Emails with D. Baruch and J. LoBue re response to DOJ email; emails with team members re MAVNI issues/concerns.	0.8	\$ 1,025	\$820.00
5/14/2018	Baruch, Douglas W.	Prep for hearing; telephonic court hearing and follow up.	3.0	\$ 1,350	\$4,050.00
5/14/2018	Gogadze, Helene	Legal research and analysis re constitutional claims.	4.0	\$ 960	\$3,840.00
5/14/2018	McNamara, Brendan	Attend team meeting; respond to soldiers' emails regarding naturalization and update trackers.	6.8	\$ 315	\$2,142.00
5/14/2018	Raol, Neaha	Team meeting; confer with J. Wollenberg, other team members re: status; conference call with court (magistrate judge), FF team, DOJ; strategy/follow-up conference with team; calls with various class members re: status, next steps, updates.	6.6	\$ 945	\$6,237.00
5/14/2018	St. Romain, Kate	Call with J. Wollenberg regarding naturalizing MAVNIs; meeting with discharged MAVNI; attend telephone status conference with magistrate judge; respond to emails from the Nio inbox; email N. Raol and B. McNamara regarding Nio inbox emails.	3.3	\$ 730	\$2,409.00
5/14/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns, including calls with MAVNIs and common interest counsel, team member discussions, and emails to DOJ; telephone hearing.	10.5	\$ 1,025	\$10,762.50
5/15/2018	Baruch, Douglas W.	Correspondence with DOJ; meetings; correspondence with clients.	1.5	\$ 1,350	\$2,025.00
5/15/2018	Gates, Shaun	Draft email to DOJ re: class member shipping to basic training; review materials re: the same.	1.4	\$ 785	\$1,099.00
5/15/2018	Gogadze, Helene	Legal research regarding constitutional claims.	3.0	\$ 960	\$2,880.00
5/15/2018	LoBue, Joseph J.	Review legal research on Administrative record issues.	1.2	\$ 1,240	\$1,488.00
5/15/2018	McNamara, Brendan	Respond to soldiers' emails re: naturalization and update trackers; draft email to the DOJ.	4.0	\$ 315	\$1,260.00

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5/15/2018	Raol, Neaha	Confer with class members, J. Wollenberg re: various issues/status updates; draft emails to DOJ re: various class member issues/examples; correspondence with J. Wollenberg, D. Baruch, J. LoBue re: same; respond to various class member inquiries/review DOJ exhibits/reports and identify issues; draft bullets re: same.	7.1	\$ 945	\$6,709.50
5/15/2018	St. Romain, Kate	Coordinate call with discharged MAVNI; email B. McNamara regarding Nio inbox responses.	0.6	\$ 730	\$438.00
5/15/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/complaints/status, including discussions with MAVNIs, team members, and common interest counsel.	5.7	\$ 1,025	\$5,842.50
5/16/2018	Baruch, Douglas W.	Meetings and calls re status and strategy.	2.0	\$ 1,350	\$2,700.00
5/16/2018	Gates, Shaun	Correspondence re: draft email to DOJ re: class member shipping to basic training.	0.2	\$ 785	\$157.00
5/16/2018	Gogadze, Helene	Analysis and research regarding constitutional claims.	4.0	\$ 960	\$3,840.00
5/16/2018	LoBue, Joseph J.	Draft, edit e-mails to Government regarding reporting and naturalization issues; review legal research.	3.6	\$ 1,240	\$4,464.00
5/16/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.5	\$ 315	\$157.50
5/16/2018	Raol, Neaha	Confer with nio class members/correspondence.	0.7	\$ 945	\$661.50
5/16/2018	St. Romain, Kate	Draft email to DOJ regarding May 9, 2018 reporting problems; email and call J. Wollenberg regarding DOJ reporting problems and draft email; email and call J. Wollenberg and B. McNamara regarding soldiers shipping in May 2018; respond to emails from the Nio inbox.	2.0	\$ 730	\$1,460.00
5/16/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	1.6	\$ 545	\$872.00
5/16/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/status with various discussions with MAVNIs, common interest counsel, and team members; draft emails to DOJ.	8.3	\$ 1,025	\$8,507.50
5/17/2018	Baruch, Douglas W.	Address DOJ correspondence and draft responses; team meetings.	2.9	\$ 1,350	\$3,915.00
5/17/2018	Gogadze, Helene	Legal research and analysis regarding constitutional claims.	3.0	\$ 960	\$2,880.00
5/17/2018	LoBue, Joseph J.	Team meeting regarding case status and action items; draft, edit e-mails to Government; review legal research for motion for reconsideration.	3.9	\$ 1,240	\$4,836.00
5/17/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ.	1.4	\$ 315	\$441.00
5/17/2018	Raol, Neaha	Respond/confer with various class members regarding status, next steps, DOJ updates (as applicable); prepare draft emails for DOJ re: outstanding issues; review H. Gogadze summary/analysis re: AR supplement/additional documents; confer with H. Gogadze re: same.	6.1	\$ 945	\$5,764.50
5/17/2018	St. Romain, Kate	Email J. Wollenberg regarding MAVNI media reference; coordinate arrangements for meet and confer.	0.3	\$ 730	\$219.00
5/17/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members.	1.4	\$ 545	\$763.00
5/17/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails to DOJ, discussions with MAVNIs and common interest counsel, and discussions with team members.	10.7	\$ 1,025	\$10,967.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/18/2018	Baruch, Douglas W.	Meet and confer with DOJ; hearing prep; address MSSD administrative record; address DOJ filing.	3.5	\$ 1,350	\$4,725.00
5/18/2018	Gates, Shaun	Meet and confer with DOJ; review amended reporting filed by Defendants.	2.8	\$ 785	\$2,198.00
5/18/2018	Gogadze, Helene	Internal team meeting and discussion; legal research and analysis.	3.0	\$ 960	\$2,880.00
5/18/2018	LoBue, Joseph J.	Prepare for conference call with Government; conference call with Government; review research on administrative record issues; team meeting on administrative record issues.	3.2	\$ 1,240	\$3,968.00
5/18/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ; update tracker; phone call with MAVNI soldier to discuss case.	6.5	\$ 315	\$2,047.50
5/18/2018	Raol, Neaha	Correspondence with class members; preliminary review of DOJ reports/updates submitted to court.	1.1	\$ 945	\$1,039.50
5/18/2018	St. Romain, Kate	Attend meet and confer with DOJ; respond to emails in the Nio inbox; check on naturalizing/interviewing soldiers.	2.2	\$ 730	\$1,606.00
5/18/2018	Szlarb, Natalia	Conference call with DOJ; respond to Nio class members communications.	2.3	\$ 545	\$1,253.50
5/18/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/status; team discussion re discovery/record; MAVNI calls/discussions with soldiers, common interest counsel, and team members.	9.3	\$ 1,025	\$9,532.50
5/19/2018	Wollenberg, Jennifer	Emails with MAVNIs, common interest counsel, and team members re MAVNI issues/concerns/updates.	0.8	\$ 1,025	\$820.00
5/20/2018	Baruch, Douglas W.	Address soldier queries.	0.7	\$ 1,350	\$945.00
5/20/2018	St. Romain, Kate	Respond to emails in the Nio inbox; chart ship dates from emails to the Nio inbox; email J. Wollenberg regarding responses to Nio inbox questions; email B. McNamara regarding Nio tracker; prepare draft email to government regarding MAVNIs shipping in June.	1.8	\$ 730	\$1,314.00
5/20/2018	Wollenberg, Jennifer	Emails with MAVNIs and team members re MAVNI issues/concerns/updates.	0.6	\$ 1,025	\$615.00
5/21/2018	Baruch, Douglas W.	Correspondence with DOJ; telephone conference with Court; client calls; address CAR opposition.	3.4	\$ 1,350	\$4,590.00
5/21/2018	Raol, Neaha	Draft/revise emails for DOJ; confer with various class members; call with magistrate; confer with D. Baruch, J. Wollenberg; review DOJ filing re: motion to compel.	4.2	\$ 945	\$3,969.00
5/21/2018	St. Romain, Kate	Respond to emails from the Nio mailbox; email B. McNamara regarding Nio inbox; call with J. Wollenberg regarding analysis of government reporting; draft email to government regarding June shippers.	2.8	\$ 730	\$2,044.00
5/21/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, internal team members, and others; prepare for and attend telephone hearing with Magistrate Meriweather.	10.6	\$ 1,025	\$10,865.00
5/22/2018	Baruch, Douglas W.	Follow-up from Court hearing; multiple calls and emails; correspondence with DOJ.	3.0	\$ 1,350	\$4,050.00
5/22/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and track responses; draft emails to the government on behalf of soldiers; phone call with J. Wollenberg.	7.1	\$ 315	\$2,236.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
5/22/2018	Raol, Neaha	Review cases cited in DOJ opposition brief; conferences / correspondence with class members; review/prep re: immigration counsel meetings; review Tiwari material.	3.0	\$ 945	\$2,835.00
5/22/2018	St. Romain, Kate	Supplements to MAVNI litigation website; respond to Nio inbox emails; call and email with J. Wollenberg regarding Nio inbox email responses; class list analysis.	1.4	\$ 730	\$1,022.00
5/22/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including calls/emails with MAVNIs, common interest counsel, and others; discussions with team members; emails to DOJ re issues.	11.4	\$ 1,025	\$11,685.00
5/23/2018	Baruch, Douglas W.	Address DOJ correspondence and reply brief re CAR.	2.4	\$ 1,350	\$3,240.00
5/23/2018	Gates, Shaun	Team meeting to discuss management of Nio Inbox.	0.8	\$ 785	\$628.00
5/23/2018	McNamara, Brendan	Respond to soldiers' emails regarding security checks and naturalization; draft emails to DOJ.	8.0	\$ 315	\$2,520.00
5/23/2018	Raol, Neaha	Team meeting re: inbox management/correspondence with class members; review correspondence with MAVNIs; draft/circulate BCT dates/notes; confer with class members, J. Wollenberg re: updates; review tracker and draft emails; draft/confer re: reply to motion to compel.	3.8	\$ 945	\$3,591.00
5/23/2018	St. Romain, Kate	Attend team meeting regarding Nio inbox response system; review bi-weekly status report; email bi-weekly status report to clients; email Nio inbox team regarding schedule and procedure.	1.5	\$ 730	\$1,095.00
5/23/2018	Szlarb, Natalia	Respond to Nio class members communications; team meeting.	0.9	\$ 545	\$490.50
5/23/2018	Wollenberg, Jennifer	Address MAVNI updates, issues, questions, etc., including discussions with MAVNIs and team members; emails to DOJ; assignment for summer associate re reply brief.	11.3	\$ 1,025	\$11,582.50
5/24/2018	Baruch, Douglas W.	Address filings and correspondence.	0.8	\$ 1,350	\$1,080.00
5/24/2018	Gogadze, Helene	Review documents; prepare draft email.	2.0	\$ 960	\$1,920.00
5/24/2018	Hinnant, H. Coleman	Update MAVNI list with additional class member information (K. St. Romain).	7.5	\$ 275	\$2,062.50
5/24/2018	LoBue, Joseph J.	Review legal research regarding supplementation of the administrative record.	1.3	\$ 1,240	\$1,612.00
5/24/2018	McNamara, Brendan	Respond to soldiers' emails regarding security checks and naturalization.	1.1	\$ 315	\$346.50
5/24/2018	Raol, Neaha	Draft/revise reply brief; research re: same; correspondence with class members.	2.2	\$ 945	\$2,079.00
5/24/2018	St. Romain, Kate	Respond to emails in the Nio Class Counsel mailbox; email and call J. Wollenberg regarding responses to emails in the Nio mailbox; track soldiers with problems for email to government; email C. Hinnant regarding information for ship date chart; email B. McNamara and J. LoBue regarding Nio inbox responses.	2.6	\$ 730	\$1,898.00
5/24/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including discussions with MAVNIs and others; emails to DOJ re problems/issues.	8.7	\$ 1,025	\$8,917.50
5/25/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; chart ship dates and draft email to the DOJ.	2.7	\$ 315	\$850.50
5/25/2018	Raol, Neaha	Review communications with class members; confer with J. Wollenberg, team communications re: same; calls with class members; draft reply brief and research re: same (deliberative process priv case law).	5.0	\$ 945	\$4,725.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
5/25/2018	St. Romain, Kate	Respond to emails in the Nio Class Counsel mailbox; track soldiers with problems for omnibus email to government; email J. Wollenberg and B. McNamara regarding Nio Class Counsel mailbox.	1.0	\$ 730	\$730.00
5/25/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including various discussions and draft emails to DOJ.	5.6	\$ 1,025	\$5,740.00
5/26/2018	Gates, Shaun	Correspondence with class members; update tracker to reflect ship dates.	2.1	\$ 785	\$1,648.50
5/26/2018	Raol, Neaha	Research re: motion to compel reply brief and draft same.	2.9	\$ 945	\$2,740.50
5/26/2018	Wollenberg, Jennifer	Email with MAVNI re issues/concerns.	0.2	\$ 1,025	\$205.00
5/27/2018	Gates, Shaun	Nio inbox correspondence.	1.5	\$ 785	\$1,177.50
5/27/2018	Wollenberg, Jennifer	Call with MAVNI re issues/concerns.	0.4	\$ 1,025	\$410.00
5/28/2018	Raol, Neaha	Draft reply brief re: motion to compel.	3.2	\$ 945	\$3,024.00
5/28/2018	Wollenberg, Jennifer	Emails with team members re MAVNI issue/concerns; draft Reply brief on USCIS CAR 7 issues.	7.8	\$ 1,025	\$7,995.00
5/29/2018	Baruch, Douglas W.	Address DOJ and client correspondence and strategy.	1.5	\$ 1,350	\$2,025.00
5/29/2018	Gogadze, Helene	Review submissions; draft email to counsel regarding administrative record.	1.5	\$ 960	\$1,440.00
5/29/2018	Hinnant, H. Coleman	Proofread and cite check Nio reply memo in support of plaintiffs' motion to compel (J. Wollenberg).	3.5	\$ 275	\$962.50
5/29/2018	LoBue, Joseph J.	Review and edit reply brief on privilege issues; review legal research; draft motion for reconsideration.	4.9	\$ 1,240	\$6,076.00
5/29/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ and chart ship dates.	2.9	\$ 315	\$913.50
5/29/2018	Raol, Neaha	Revise/finalize reply for motion to compel; confer with J. Wollenberg re: same; confer with Nio class members.	3.5	\$ 945	\$3,307.50
5/29/2018	St. Romain, Kate	Email B. McNamara regarding June shippers; call B. McNamara regarding Nio inbox.	0.2	\$ 730	\$146.00
5/29/2018	Szlarb, Natalia	Audit the Nio mailbox; respond to Nio class members communications; update the table with details of the Nio class members.	1.5	\$ 545	\$817.50
5/29/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including calls with MAVNIs, discussions with team members, and emails to DOJ; draft and finalize Reply brief re USCIS CAR 7.	9.7	\$ 1,025	\$9,942.50
5/30/2018	Baruch, Douglas W.	Address DOJ correspondence and strategy.	1.5	\$ 1,350	\$2,025.00
5/30/2018	LoBue, Joseph J.	Draft motion for reconsideration.	2.4	\$ 1,240	\$2,976.00
5/30/2018	Raol, Neaha	Correspondence with J. Wollenberg, MAVNIs; review govt filings/correspondence with class members.	2.4	\$ 945	\$2,268.00
5/30/2018	St. Romain, Kate	Respond to emails in the Nio inbox; chart ship dates from emails to the Nio inbox; email J. Wollenberg and N. Raol regarding soldiers with delays between interview and naturalization.	2.3	\$ 730	\$1,679.00
5/30/2018	Szlarb, Natalia	Audit the Nio mailbox; respond to Nio class members communications; update the table with details of the Nio class members.	0.8	\$ 545	\$436.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
5/30/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and team members.	4.6	\$ 1,025	\$4,715.00
5/31/2018	Baruch, Douglas W.	Prepare for telephonic court hearing; court hearing and follow up.	2.0	\$ 1,350	\$2,700.00
5/31/2018	St. Romain, Kate	Respond to emails in the Nio inbox; chart ship dates from emails to the Nio inbox; review Defendants response to magistrate and plaintiffs questions; attend conference call with magistrate judge, team and defense counsel; email and meet with J. Wollenberg regarding missing MAVNI lists and class/reporting list comparisons; coordinate comparison lists with W. Bacon.	4.8	\$ 730	\$3,504.00
5/31/2018	Szlarb, Natalia	Conference call with Magistrate Judge; audit the Nio mailbox; respond to Nio class members communications; update the table with details of the Nio class members.	2.1	\$ 545	\$1,144.50
5/31/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and conference with Judge Meriweather.	4.7	\$ 1,025	\$4,817.50
6/1/2018	Baruch, Douglas W.	Correspondence with DOJ; address brief re proposals.	2.0	\$ 1,350	\$2,700.00
6/1/2018	Gates, Shaun	Meeting re: response to Defendants' email to magistrate; respond to class members re: DoD background check status.	3.1	\$ 785	\$2,433.50
6/1/2018	Gogadze, Helene	Work on email and documents regarding MSSD claims; internal discussions.	1.0	\$ 960	\$960.00
6/1/2018	LoBue, Joseph J.	Review administrative record documents; review and edit correspondence to Government regarding administration record.	1.4	\$ 1,240	\$1,736.00
6/1/2018	Raol, Neaha	Confer with class members; email correspondence with common interest counsel re: same.	0.6	\$ 945	\$567.00
6/1/2018	St. Romain, Kate	Meet with, call and email J. Wollenberg regarding list of missing class members; coordinate with C. Hinnant and J. Thompson regarding project concerning list of missing class members; respond to soldier emails in Nio inbox; email K. Grisez and common interest counsel regarding responses to class member emails; call and email S. Gates regarding responses to Nio inbox emails.	1.6	\$ 730	\$1,168.00
6/1/2018	Szlarb, Natalia	Audit the Nio mailbox; respond to Nio class members communications; update the table with details of the Nio class members.	1.7	\$ 545	\$926.50
6/1/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails to DOJ, discussions with MAVNIs, and discussions with team members; address DOJ email to Magistrate Meriweather and discussion with team members re response; prepare email re administrative record.	4.1	\$ 1,025	\$4,202.50
6/2/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including review of MAVNI emails.	2.4	\$ 1,025	\$2,460.00
6/3/2018	St. Romain, Kate	Prepare schedule for Nio inbox responses and email Nio mailbox team regarding schedule; email J. Wollenberg regarding exhibits for email to defendants.	0.2	\$ 730	\$146.00
6/3/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates and emails with MAVNIs and team members re same; emails to DOJ.	6.2	\$ 1,025	\$6,355.00
6/4/2018	Baruch, Douglas W.	Address Court order and various emails to DOJ.	1.5	\$ 1,350	\$2,025.00
6/4/2018	Gates, Shaun	Correspondence with class members re: status of litigation.	4.8	\$ 785	\$3,768.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/4/2018	Gogadze, Helene	Working on draft memorandum in response to court's order; internal discussions.	4.0	\$ 960	\$3,840.00
6/4/2018	LoBue, Joseph J.	Review legal research for discovery issues.	1.5	\$ 1,240	\$1,860.00
6/4/2018	Raol, Neaha	Confer with Nio class member; review court order/next steps.	0.3	\$ 945	\$283.50
6/4/2018	St. Romain, Kate	Meet with J. Wollenberg regarding class list/reporting comparisons; email C. Hinnant regarding check of class list/reporting comparisons; prepare exhibit A and B for email to government; respond to soldier emails from the Nio inbox; email common interest counsel regarding soldier missing from MAVNI reporting; analyze court order; supplement MAVNI litigation website with court order; email clients and common interest counsel regarding Court order.	5.1	\$ 730	\$3,723.00
6/4/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with MAVNIs and Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members.	1.2	\$ 545	\$654.00
6/4/2018	Wollenberg, Jennifer	Respond to MAVNI issues/concerns/updates; draft emails to DOJ re same; review Court order and discuss next steps with team members.	10.9	\$ 1,025	\$11,172.50
6/5/2018	Baruch, Douglas W.	Address DOJ correspondence.	0.7	\$ 1,350	\$945.00
6/5/2018	Gates, Shaun	Correspondence with class members re: litigation status; draft response to DOJ re: magistrate referral solutions.	11.2	\$ 785	\$8,792.00
6/5/2018	Gogadze, Helene	Working on draft memorandum in response to court's order; internal discussions.	4.0	\$ 960	\$3,840.00
6/5/2018	Raol, Neaha	Review court order; internal conferences re same.	0.5	\$ 945	\$472.50
6/5/2018	St. Romain, Kate	Respond to soldier emails from the Nio inbox; email J. Wollenberg regarding MAVNI reporting problems; email S. Gates regarding additional information for MAVNI tracker; email J. Wollenberg draft email to government regarding June shipper.	1.3	\$ 730	\$949.00
6/5/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with MAVNIs and Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members.	3.1	\$ 545	\$1,689.50
6/5/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with team members, MAVNIs, and common interest counsel and emails to DOJ.	7.0	\$ 1,025	\$7,175.00
6/6/2018	Baruch, Douglas W.	Address DOJ reports and follow up.	0.9	\$ 1,350	\$1,215.00
6/6/2018	Gates, Shaun	Review government's filing in Nio re: class-wide reporting.	0.9	\$ 785	\$706.50
6/6/2018	Gogadze, Helene	Work on drafting memo in response to court's order.	4.0	\$ 960	\$3,840.00
6/6/2018	LoBue, Joseph J.	Review legal research for administrative record issues; draft brief on MAVNI discharge issues.	4.1	\$ 1,240	\$5,084.00
6/6/2018	Raol, Neaha	Review reports filed by DOJ and compare to May reports; conferences with J. Wollenberg, S. Gates re: same; confer with various class members re: same.	4.5	\$ 945	\$4,252.50
6/6/2018	St. Romain, Kate	Respond to emails in the Nio mailbox; email clients regarding Court order and bi-weekly reporting; email N. Szlarb and J. Wollenberg regarding Nio inbox responses; coordinate supplements to MAVNI litigation website; review Nio report filing.	1.3	\$ 730	\$949.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/6/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with MAVNIs and Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	8.7	\$ 545	\$4,741.50
6/6/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates and case strategy.	7.3	\$ 1,025	\$7,482.50
6/7/2018	Baruch, Douglas W.	Address DOJ correspondence and confer with team.	1.1	\$ 1,350	\$1,485.00
6/7/2018	Gates, Shaun	Internal correspondence re: response to DOJ's letter to magistrate.	0.3	\$ 785	\$235.50
6/7/2018	Gogadze, Helene	Drafting memorandum in response to order.	4.0	\$ 960	\$3,840.00
6/7/2018	LoBue, Joseph J.	Review legal research; draft brief in response to court order.	4.5	\$ 1,240	\$5,580.00
6/7/2018	McNamara, Brendan	Team meeting to discuss monthly reporting; respond to soldiers' emails regarding naturalization.	1.2	\$ 315	\$378.00
6/7/2018	Raol, Neaha	Team meeting; review/analyze DOJ reports; confer with various class members re: status/updates; confer with J. Wollenberg re: DOJ reports.	4.8	\$ 945	\$4,536.00
6/7/2018	St. Romain, Kate	Attend meeting with J. Wollenberg, S. Gates, B. McNamara, N. Raol and N. Szlarb regarding Nio monthly reporting; respond to emails in the Nio mailbox; review court email regarding reporting.	1.7	\$ 730	\$1,241.00
6/7/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with MAVNIs and Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.6	\$ 545	\$4,142.00
6/7/2018	Wollenberg, Jennifer	MAVNI issues/concerns/updates; emails to DOJ; discuss with team members strategy, upcoming briefs, etc.	8.3	\$ 1,025	\$8,507.50
6/8/2018	Baruch, Douglas W.	Address correspondence and confer with J. Wollenberg.	1.3	\$ 1,350	\$1,755.00
6/8/2018	Gogadze, Helene	Drafting court-ordered memorandum.	7.0	\$ 960	\$6,720.00
6/8/2018	LoBue, Joseph J.	Review legal research; draft and edit brief on issues raised by the court's order.	4.3	\$ 1,240	\$5,332.00
6/8/2018	McNamara, Brendan	Review emails and prepare email to the DOJ of soldiers missing from the government's monthly reporting.	3.6	\$ 315	\$1,134.00
6/8/2018	Raol, Neaha	Confer with various class members re: status/updates/reports filed by DOJ; confer with N. Szlarb re: same; review/analyze DOJ reports re: MANVIs for which notification provided over 2 months ago.	6.8	\$ 945	\$6,426.00
6/8/2018	St. Romain, Kate	Respond to emails from class members; email and call J. Wollenberg regarding class member emails; email plaintiff regarding CI DOD reporting and progress; email common interest counsel and J. Wollenberg regarding soldier missing from government reporting; prepare analysis regarding naturalized MAVNI soldiers; meet with J. Wollenberg regarding analysis of naturalized MAVNI soldiers.	1.5	\$ 730	\$1,095.00
6/8/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with MAVNIs and Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	8.3	\$ 545	\$4,523.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/8/2018	Wollenberg, Jennifer	Address MAVNI issues, updates, and problems, including through discussions with MAVNIs; discussions with team members re same and re strategy/briefs/arguments; emails to DOJ.	7.0	\$ 1,025	\$7,175.00
6/9/2018	Baruch, Douglas W.	Edits and revisions to brief re June 4 order.	2.5	\$ 1,350	\$3,375.00
6/9/2018	Gogadze, Helene	Drafting memorandum in response to court's order.	2.0	\$ 960	\$1,920.00
6/9/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ and chart ship dates.	2.5	\$ 315	\$787.50
6/9/2018	Wollenberg, Jennifer	Address emails re MAVNI issues/concerns/updates.	0.5	\$ 1,025	\$512.50
6/10/2018	Gogadze, Helene	Address memo in response to court's order.	4.0	\$ 960	\$3,840.00
6/10/2018	Wollenberg, Jennifer	Review and revise memorandum per court's order due tomorrow and emails with team members re same.	4.8	\$ 1,025	\$4,920.00
6/11/2018	Baruch, Douglas W.	Drafting response re June 4 order; confer with team re submissions and status.	2.4	\$ 1,350	\$3,240.00
6/11/2018	Gates, Shaun	Revise reply to government's letter to magistrate re: proposed solutions.	0.6	\$ 785	\$471.00
6/11/2018	Gogadze, Helene	Work on today's filing.	5.0	\$ 960	\$4,800.00
6/11/2018	Hinnant, H. Coleman	Proofread and cite check Nio reply memo in response to the court's order (J. Wollenberg).	2.5	\$ 275	\$687.50
6/11/2018	LoBue, Joseph J.	Review, edit brief in response to court's order.	3.4	\$ 1,240	\$4,216.00
6/11/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.5	\$ 315	\$472.50
6/11/2018	Raol, Neaha	Review parties' briefs/filings; confer with various class members.	2.1	\$ 945	\$1,984.50
6/11/2018	St. Romain, Kate	Check docket citations for MAVNI response brief; email J. Wollenberg, C. Hinnant and H. Gogadze regarding MAVNI response brief; email clients, common interest counsel and common interest counsel regarding response to Court's June 4 order; coordinate supplement of MAVNI litigation website with response brief.	1.3	\$ 730	\$949.00
6/11/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.6	\$ 545	\$3,597.00
6/11/2018	Wollenberg, Jennifer	Prepare brief for filing and errata; calls/emails/discussions with common interest counsel, team members, and MAVNIs re MAVNI issues/concerns; prepare emails to DOJ.	8.1	\$ 1,025	\$8,302.50
6/12/2018	Baruch, Douglas W.	Meetings and calls re strategy and MSSD briefing and missing class members.	4.0	\$ 1,350	\$5,400.00
6/12/2018	Kiziltay Carter, Melis	Attend telephone conference with J. Wollenberg and D. Baruch to discuss motion to compel; work on the motion.	0.6	\$ 630	\$378.00
6/12/2018	LoBue, Joseph J.	Conference call with MAVNI soldiers regarding discharge issues; review, edit MAVNI complaint; review legal research on administrative record issues.	3.8	\$ 1,240	\$4,712.00
6/12/2018	McNamara, Brendan	Finalize email to send to DOJ.	0.6	\$ 315	\$189.00
6/12/2018	Raol, Neaha	Review correspondence re: missing class members; confer with various class members, J. Wollenberg; review/analyze reporting re: scheduled interviews.	5.1	\$ 945	\$4,819.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/12/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.8	\$ 545	\$4,251.00
6/12/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, discussions with common interest counsel, and discussions with internal team members; assign memo project to M. Kiziltay-Carter; draft emails to DOJ, including "missing" list; provide courtesy copies of yesterday's filing.	9.8	\$ 1,025	\$10,045.00
6/13/2018	Baruch, Douglas W.	Drafting MSSD motion and correspondence.	5.0	\$ 1,350	\$6,750.00
6/13/2018	Kiziltay Carter, Melis	Draft motion to compel.	1.5	\$ 630	\$945.00
6/13/2018	St. Romain, Kate	Email J. Wollenberg and D. Baruch regarding plaintiff MSSD; call with plaintiff and D. Baruch regarding MSSD results; email regarding Nio inbox potential response.	0.4	\$ 730	\$292.00
6/13/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.6	\$ 545	\$4,142.00
6/13/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members; review draft complaint of individual MAVNI.	7.4	\$ 1,025	\$7,585.00
6/14/2018	Baruch, Douglas W.	Drafting motion re MSSD.	3.5	\$ 1,350	\$4,725.00
6/14/2018	Kiziltay Carter, Melis	Draft motion to compel.	7.9	\$ 630	\$4,977.00
6/14/2018	St. Romain, Kate	Organize client communications in MAVNI database; email J. Wollenberg regarding model AIT training naturalization email; meetings with immigration lawyers and MAVNIs.	4.4	\$ 730	\$3,212.00
6/14/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.4	\$ 545	\$4,033.00
6/14/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members.	5.6	\$ 1,025	\$5,740.00
6/15/2018	Baruch, Douglas W.	Address missing class member filing; status; correspondence.	4.5	\$ 1,350	\$6,075.00
6/15/2018	Kiziltay Carter, Melis	Attend team call; draft motion to compel.	7.3	\$ 630	\$4,599.00
6/15/2018	Raol, Neaha	Correspondence with class member; review filings by DOJ.	1.3	\$ 945	\$1,228.50
6/15/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.0	\$ 545	\$3,815.00
6/15/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including calls with MAVNIs, discussions with team members, and discussions with common interest counsel; draft emails to DOJ.	7.8	\$ 1,025	\$7,995.00
6/16/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/16/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails and call with plaintiff and common interest counsel.	2.5	\$ 1,025	\$2,562.50
6/17/2018	Kiziltay Carter, Melis	Draft motion to compel.	4.4	\$ 630	\$2,772.00
6/17/2018	St. Romain, Kate	Respond to soldier emails to the Nio inbox; email N. Szlarb and B. McNamara regarding outstanding issues for MAVNI inbox responses; email J. Wollenberg and K. Grisez regarding potential MAVNI representation.	0.4	\$ 730	\$292.00
6/18/2018	Baruch, Douglas W.	Revising motions and hearing prep.	3.5	\$ 1,350	\$4,725.00
6/18/2018	Kiziltay Carter, Melis	Draft motion to compel.	1.2	\$ 630	\$756.00
6/18/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and draft email to DOJ.	0.3	\$ 315	\$94.50
6/18/2018	Raol, Neaha	Confer with D. Baruch, J. LoBue, J. Wollenberg re: 6/20 hearing/arguments and discharge issues; review Wagafe briefing; research/prep for hearing; confer with D. Baruch re: same; research re: time-out rule.	6.8	\$ 945	\$6,426.00
6/18/2018	St. Romain, Kate	Email team regarding MAVNI meetings; email J. Wollenberg, D. Baruch and J. LoBue regarding client "derogatory" information.	0.2	\$ 730	\$146.00
6/18/2018	Szlarb, Natalia	Audit the Nio Mailbox; conference call with Jennifer Wollenberg; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.2	\$ 545	\$2,834.00
6/18/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members.	10.6	\$ 1,025	\$10,865.00
6/19/2018	Baruch, Douglas W.	Address strategy and hearing preparation.	5.5	\$ 1,350	\$7,425.00
6/19/2018	LoBue, Joseph J.	Meeting with MAVNI team to prepare for June 20 court hearing; prepare for June 20 court hearing.	6.5	\$ 1,240	\$8,060.00
6/19/2018	Raol, Neaha	Prep for oral argument/hearing; research re: 3-year rule; draft outline of argument talking points; various conferences with D. Baruch, J. Wollenberg re: same; review court opinion; correspondence with/from class members.	9.5	\$ 945	\$8,977.50
6/19/2018	St. Romain, Kate	Meet with J. Wollenberg regarding discharge processes and regulations; email B. McNamara and N. Szlarb regarding Nio inbox and proposed responses; meet with J. LoBue regarding discharge processes; distribute article regarding naturalized MAVNI; email MAVNI.	0.8	\$ 730	\$584.00
6/19/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.4	\$ 545	\$2,943.00
6/19/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails with MAVNIs, common interest counsel, and team members.	1.3	\$ 1,025	\$1,332.50
6/20/2018	Baruch, Douglas W.	Prep for Court hearing, hearing, and follow-up.	6.5	\$ 1,350	\$8,775.00
6/20/2018	Raol, Neaha	Draft outline of talking points for hearing; conferences with J. Wollenberg, K. St. Romain re: hearing prep/documents; attend court hearing; team conference/meeting following hearing re: next steps.	9.6	\$ 945	\$9,072.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/20/2018	St. Romain, Kate	Prepare documents for J. Wollenberg for status hearing; meet with J. Wollenberg regarding status hearing exhibits; attend status hearing; email J. Wollenberg regarding Nio inbox response issues; email team regarding naturalized MAVNI.	6.1	\$ 730	\$4,453.00
6/20/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.2	\$ 545	\$2,834.00
6/20/2018	Wollenberg, Jennifer	Prep and attend hearing; discussions with MAVNIs; follow-on team meeting.	10.9	\$ 1,025	\$11,172.50
6/21/2018	Baruch, Douglas W.	Address hearing outcome and follow-up and DOJ correspondence.	2.3	\$ 1,350	\$3,105.00
6/21/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.9	\$ 315	\$283.50
6/21/2018	Raol, Neaha	Confer/correspondence with Nio class members; review similar case complaint.	2.7	\$ 945	\$2,551.50
6/21/2018	St. Romain, Kate	Supplements to MAVNI litigation website; email N. Szlarb and B. McNamara regarding tracking MAVNI litigation reporting problems; email J. Wollenberg regarding naturalized soldiers.	0.6	\$ 730	\$438.00
6/21/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	4.2	\$ 545	\$2,289.00
6/21/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, discussions with common interest counsel, and team member discussions.	10.5	\$ 1,025	\$10,762.50
6/22/2018	Baruch, Douglas W.	Review related case complaint; address correspondence to DOJ and strategy.	3.5	\$ 1,350	\$4,725.00
6/22/2018	Raol, Neaha	Confer with Nio class members.	0.7	\$ 945	\$661.50
6/22/2018	St. Romain, Kate	Email N. Szlarb regarding MAVNI naturalization update; call with plaintiff regarding status hearing.	0.2	\$ 730	\$146.00
6/22/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.6	\$ 545	\$1,962.00
6/22/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	6.8	\$ 1,025	\$6,970.00
6/23/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 315	\$94.50
6/23/2018	St. Romain, Kate	Coordinate June Nio inbox response schedule with N. Szlarb, B. McNamara and J. Wollenberg.	0.2	\$ 730	\$146.00
6/23/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.4	\$ 545	\$1,853.00
6/23/2018	Wollenberg, Jennifer	Address emails re MAVNI issues.	1.3	\$ 1,025	\$1,332.50
6/24/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00
6/24/2018	Wollenberg, Jennifer	Address MAVNI emails re issues/concerns/updates.	2.4	\$ 1,025	\$2,460.00
6/25/2018	Raol, Neaha	Confer with Nio class members; confer with J. Wollenberg re: same.	1.8	\$ 945	\$1,701.00
6/25/2018	St. Romain, Kate	Email and call J. Wollenberg and N. Szlarb regarding responses to the Nio inbox; respond to soldier emails to the Nio inbox; email N. Szlarb regarding outstanding issues for MAVNI inbox responses.	0.8	\$ 730	\$584.00
6/25/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.4	\$ 545	\$1,853.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
6/25/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails with team, MAVNIs, and common interest counsel; work on matter for plaintiff; emails to DOJ.	10.1	\$ 1,025	\$10,352.50
6/26/2018	St. Romain, Kate	Respond to soldier emails in the Nio inbox; email N. Szlarb regarding outstanding issues for MAVNI inbox responses.	0.2	\$ 730	\$146.00
6/26/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.9	\$ 545	\$2,125.50
6/26/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; work on plaintiff case.	12.2	\$ 1,025	\$12,505.00
6/27/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and draft emails to DOJ.	2.7	\$ 315	\$850.50
6/27/2018	Raol, Neaha	Review DOJ filings re: production of May 18 guidance; confer with team members re: various items; confer/correspond with class members; review DOJ papers/comments re: naturalization.	3.0	\$ 945	\$2,835.00
6/27/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	4.7	\$ 545	\$2,561.50
6/27/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; work on plaintiff case.	12.4	\$ 1,025	\$12,710.00
6/28/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	2.9	\$ 315	\$913.50
6/28/2018	Raol, Neaha	Review/revise/cite-check plaintiff complaint; confer with J. Wollenberg re: same; correspondence re: various class members.	3.7	\$ 945	\$3,496.50
6/28/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	2.2	\$ 545	\$1,199.00
6/28/2018	Wollenberg, Jennifer	Address MAVNI issues and emails; finalize and file plaintiff complaint; work on plaintiff PI filing.	13.3	\$ 1,025	\$13,632.50
6/29/2018	Raol, Neaha	Review court filings.	0.3	\$ 945	\$283.50
6/29/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.5	\$ 545	\$1,907.50
6/29/2018	Wollenberg, Jennifer	Address MAVNI issues/emails/calls; plaintiff PI filing and related emails/tasks.	13.8	\$ 1,025	\$14,145.00
7/1/2018	St. Romain, Kate	Respond to soldier emails in the Nio inbox.	0.8	\$ 730	\$584.00
7/2/2018	Kiziltay Carter, Melis	Attend team meeting, draft brief related to the May 17 guidance.	8.4	\$ 630	\$5,292.00
7/2/2018	Raol, Neaha	Review press / articles re: immigrant soldiers.	1.0	\$ 945	\$945.00
7/2/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.7	\$ 545	\$4,196.50
7/2/2018	Wollenberg, Jennifer	Calls with MAVNIs re issues/concerns; team meeting re response due in Nio case; prepare materials/response re May 18 Memo; call with plaintiff; hearing re plaintiff case.	9.8	\$ 1,025	\$10,045.00
7/3/2018	Kiziltay Carter, Melis	Assisted with the filing of Supplement to Plaintiff's Motion for a Preliminary Injunction and Plaintiff's Response related to May 17 guidance.	8.0	\$ 630	\$5,040.00
7/3/2018	Raol, Neaha	Revise / review / finalize response re: USCIS May 17 guidance; conferences with J. Wollenberg, K. St. Romain re: same.	3.5	\$ 945	\$3,307.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/3/2018	St. Romain, Kate	Email N. Szlarb regarding Nio inbox responses; respond to MAVNI soldier emails from the Nio inbox; edit response regarding the admissibility of USCIS's May 17 2018 guidance and meet and email with J. Wollenberg and N. Raol regarding the same.	2.0	\$ 730	\$1,460.00
7/3/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.1	\$ 545	\$1,689.50
7/3/2018	Wollenberg, Jennifer	Prepare response re May memo in Nio case; address updates.	11.6	\$ 1,025	\$11,890.00
7/4/2018	St. Romain, Kate	Email J. Wollenberg regarding response regarding the admissibility of USCIS's May 17 2018 guidance; draft update to clients regarding upcoming deadlines, filings and Calixto lawsuit; email plaintiff regarding discharge; respond to MAVNI soldier emails from the Nio inbox; email team regarding naturalization.	1.0	\$ 730	\$730.00
7/4/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails with MAVNIs.	3.5	\$ 1,025	\$3,587.50
7/5/2018	Baruch, Douglas W.	Address summary judgment issues; team meeting to discuss strategy and assignments.	4.5	\$ 1,350	\$6,075.00
7/5/2018	Gates, Shaun	Research for summary judgment motion.	1.3	\$ 785	\$1,020.50
7/5/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	8.2	\$ 630	\$5,166.00
7/5/2018	LoBue, Joseph J.	Meeting with litigation team regarding case status and action items; meeting with litigation team regarding summary judgment motion; review legal research for summary judgment motion.	2.8	\$ 1,240	\$3,472.00
7/5/2018	Raol, Neaha	Team conference re: summary judgment motion outline with D. Baruch, J. LoBue, J. Wollenberg, M. Kiziltay; follow up with M. Kiziltay re: case background, legal arguments, outline.	3.2	\$ 945	\$3,024.00
7/5/2018	St. Romain, Kate	Email N. Szlarb regarding Nio inbox responses; respond to MAVNI soldier emails from the Nio inbox; prepare client alert and email J. Wollenberg regarding alert results.	0.3	\$ 730	\$219.00
7/5/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.1	\$ 545	\$3,324.50
7/5/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; team meeting re SJ preparation.	10.7	\$ 1,025	\$10,967.50
7/6/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	8.0	\$ 630	\$5,040.00
7/6/2018	LoBue, Joseph J.	Review research for summary judgment motion; draft outline for summary judgment motion; draft summary judgment motion.	4.7	\$ 1,240	\$5,828.00
7/6/2018	Raol, Neaha	Prepare summary judgment outline; conferences with M. Kiziltay re: same.	2.0	\$ 945	\$1,890.00
7/6/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.9	\$ 545	\$2,125.50
7/6/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; calls with MAVNIs.	12.2	\$ 1,025	\$12,505.00
7/7/2018	Szlarb, Natalia	Audit the Nio Mailbox; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.8	\$ 545	\$2,071.00
7/7/2018	Wollenberg, Jennifer	Emails re MAVNI issues/questions, including with internal team members.	1.4	\$ 1,025	\$1,435.00
7/8/2018	Wollenberg, Jennifer	Emails re Nio action.	2.6	\$ 1,025	\$2,665.00
7/9/2018	Baruch, Douglas W.	Summary judgment research.	2.5	\$ 1,350	\$3,375.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/9/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	7.5	\$ 630	\$4,725.00
7/9/2018	LoBue, Joseph J.	Review legal research for summary judgment motion.	2.7	\$ 1,240	\$3,348.00
7/9/2018	McNamara, Brendan	Respond to soldiers' emails re naturalization; draft emails to DOJ.	8.1	\$ 315	\$2,551.50
7/9/2018	Raol, Neaha	Confer with class members; confer with D. Baruch, C. Wilhelmi re: SJM research; confer/correspondence with M. Kiziltay re: SJM outline and research/follow-up re: same; team conference re: Nio reporting and follow-up tasks.	4.5	\$ 945	\$4,252.50
7/9/2018	St. Romain, Kate	Email B. McNamara and N. Szlarb regarding Nio inbox; email N. Raol regarding reporting response; email J. Wollenberg and N. Raol regarding naturalization law.	0.4	\$ 730	\$292.00
7/9/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.7	\$ 545	\$3,106.50
7/9/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members.	9.8	\$ 1,025	\$10,045.00
7/10/2018	Baruch, Douglas W.	Address summary judgment; correspondence with DOJ; document review and strategy.	4.5	\$ 1,350	\$6,075.00
7/10/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	7.8	\$ 630	\$4,914.00
7/10/2018	LoBue, Joseph J.	Draft summary judgment brief.	2.5	\$ 1,240	\$3,100.00
7/10/2018	McNamara, Brendan	Respond to soldiers' emails re naturalization; draft emails to DOJ.	1.3	\$ 315	\$409.50
7/10/2018	Raol, Neaha	Correspondence/follow-up with C. Wilhelmi re: SJM research; confer with M. Kiziltay re: SJM outline; various conferences with J. Wollenberg re: same and various correspondence/conferences with class members.	0.9	\$ 945	\$850.50
7/10/2018	Stachniak Kaplan, Kayla	Review recent Nio, Kirwa, and Calixto filings.	1.1	\$ 960	\$1,056.00
7/10/2018	Szlarb, Natalia	Audit the Nio Mailbox; review email drafted by Elizabeth Woods; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.1	\$ 545	\$2,779.50
7/10/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members.	10.5	\$ 1,025	\$10,762.50
7/10/2018	Woods, Elizabeth	Conference with N. Szlarb regarding preparing correspondence to Nio class members; prepare email correspondence to Nio class members.	2.7	\$ 545	\$1,471.50
7/11/2018	Baruch, Douglas W.	Calls and review of documents and regulations; confer with J. Wollenberg; address SJ motion.	4.5	\$ 1,350	\$6,075.00
7/11/2018	Gates, Shaun	Research for summary judgment brief.	0.6	\$ 785	\$471.00
7/11/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	0.6	\$ 630	\$378.00
7/11/2018	LoBue, Joseph J.	Draft summary judgment motion.	5.7	\$ 1,240	\$7,068.00
7/11/2018	McNamara, Brendan	Respond to soldiers' emails re naturalization; compile data and draft emails to DOJ.	2.3	\$ 315	\$724.50
7/11/2018	Raol, Neaha	Review court's order; case news/articles; email correspondence re: research with C. Wilhelmi; correspondence with/re: class members.	0.6	\$ 945	\$567.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/11/2018	St. Romain, Kate	Call with MAVNI soldier regarding litigation and soldier's status; email team regarding call with MAVNI soldier.	0.7	\$ 730	\$511.00
7/11/2018	Szlarb, Natalia	Respond to Nio class members communications; revise email drafted by Elizabeth Woods; update the table with details of the Nio class members; draft e-mails to DOJ.	4.7	\$ 545	\$2,561.50
7/11/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members.	11.6	\$ 1,025	\$11,890.00
7/11/2018	Woods, Elizabeth	Review email correspondence from Nio class members; prepare email correspondence to Nio class members and to defendants' counsel.	4.1	\$ 545	\$2,234.50
7/12/2018	Baruch, Douglas W.	Calls and emails re status and filings.	3.5	\$ 1,350	\$4,725.00
7/12/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	2.2	\$ 630	\$1,386.00
7/12/2018	LoBue, Joseph J.	Draft summary judgment motion.	3.9	\$ 1,240	\$4,836.00
7/12/2018	McNamara, Brendan	Attending team meeting; respond to soldiers' emails re naturalization; compile data on missing soldiers; draft email to DOJ.	4.1	\$ 315	\$1,291.50
7/12/2018	Szlarb, Natalia	Audit the Nio Mailbox; review email drafted by Elizabeth Woods; respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	2.3	\$ 545	\$1,253.50
7/12/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members.	10.2	\$ 1,025	\$10,455.00
7/12/2018	Woods, Elizabeth	Review email correspondence from Nio class members; prepare email correspondence to Nio class members and to defendants' counsel.	3.4	\$ 545	\$1,853.00
7/13/2018	Baruch, Douglas W.	Address status and correspondence.	0.7	\$ 1,350	\$945.00
7/13/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	4.5	\$ 630	\$2,835.00
7/13/2018	McNamara, Brendan	Respond to soldiers' emails re naturalization.	1.0	\$ 315	\$315.00
7/13/2018	Raol, Neaha	Confer with class members; correspondence/confer with team members re: corrections to Nio reporting; review/revise draft emails to DOJ; confer with J. Wollenberg re: same; confer with C. Wilhelmi re: SJM research; confer with M. Kiziltay re: SJM outline.	3.1	\$ 945	\$2,929.50
7/13/2018	St. Romain, Kate	Call with J. Wollenberg regarding inaccuracies in government reports; prepare lists and checks of soldiers missing from DOJ list and email to J. Wollenberg; email M. Kiziltay Carter regarding class list and reporting issues.	1.1	\$ 730	\$803.00
7/13/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members; draft email to DOJ re issues with reporting, etc.	5.1	\$ 1,025	\$5,227.50
7/14/2018	Wollenberg, Jennifer	Review Defendants' reporting in Nio and identify issues for email re same; address MAVNI issues/updates/concerns.	3.7	\$ 1,025	\$3,792.50
7/15/2018	Baruch, Douglas W.	Correspondence to DOJ re reporting deficiencies.	0.8	\$ 1,350	\$1,080.00
7/15/2018	Raol, Neaha	Review draft email to DOJ and follow-up/comments re: same.	0.6	\$ 945	\$567.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/15/2018	Szlarb, Natalia	Review emails to DOJ regarding the government report; communications with class members.	3.2	\$ 545	\$1,744.00
7/15/2018	Wollenberg, Jennifer	Email re Nio reporting problems/concerns; address MAVNI issues/concerns/updates/questions.	2.4	\$ 1,025	\$2,460.00
7/16/2018	Baruch, Douglas W.	Address summary judgment, call with soldier, address client inquiries and correspondence with DOJ.	2.5	\$ 1,350	\$3,375.00
7/16/2018	Raol, Neaha	Prepare draft letter for class member; confer with D. Baruch, J. Wollenberg re: status; conference/email correspondence re: discharges; review paperwork/follow-up re: same; review/edit draft emails to DOJ re: class members.	6.1	\$ 945	\$5,764.50
7/16/2018	St. Romain, Kate	Call with plaintiff; coordinate supplements to MAVNI litigation website; email plaintiff regarding defendants' response to PI motion; call with plaintiff regarding hearing and minute order; call with MAVNI soldier regarding naturalization application and email J. Wollenberg and Nio class inbox regarding the same; review court order regarding admissibility of May 18 guidance.	1.0	\$ 730	\$730.00
7/16/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.6	\$ 545	\$3,597.00
7/16/2018	Wollenberg, Jennifer	Address MAVNI emails, emails from team members, etc. re MAVNI concerns/issues/updates; calls with MAVNIs.	5.5	\$ 1,025	\$5,637.50
7/16/2018	Woods, Elizabeth	Review and prepare email correspondence for Nio class members.	0.3	\$ 545	\$163.50
7/17/2018	Baruch, Douglas W.	Address SJ and strategy; client calls and DOJ correspondence.	2.5	\$ 1,350	\$3,375.00
7/17/2018	Gates, Shaun	Summary judgment research.	0.5	\$ 785	\$392.50
7/17/2018	Kiziltay Carter, Melis	Work on summary judgment motion; meeting with summer associate S. Madigan to discuss summary judgment motion.	8.7	\$ 630	\$5,481.00
7/17/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	10.1	\$ 315	\$3,181.50
7/17/2018	Raol, Neaha	Review court minute orders re: upcoming submissions; confer with D. Baruch re: same; finalize letter for class member; confer with various class members re: status/inquiries; update from class member and draft email for DOJ; review prior briefing re: issues with DOJ reporting; confer with various discharged class members.	6.5	\$ 945	\$6,142.50
7/17/2018	St. Romain, Kate	Email B. McNamara and N. Szlarb regarding Nio inbox; distribute MAVNI article to team; call J. Wollenberg regarding MAVNIs missing from government reporting and email B. McNamara regarding the same.	0.6	\$ 730	\$438.00
7/17/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	1.8	\$ 545	\$981.00
7/17/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates via discussions with MAVNIs, team members, and common interest counsel.	4.4	\$ 1,025	\$4,510.00
7/18/2018	Baruch, Douglas W.	Address motions, DOJ correspondence, and client calls and correspondence.	2.5	\$ 1,350	\$3,375.00
7/18/2018	Gates, Shaun	Research re: summary judgment.	1.2	\$ 785	\$942.00
7/18/2018	Kiziltay Carter, Melis	Work on summary judgment motion.	8.3	\$ 630	\$5,229.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/18/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.7	\$ 315	\$850.50
7/18/2018	Raol, Neaha	Confer with J. Wollenberg, D. Baruch re: filings due 7/23, 7/25; confer with various class members re: status (naturalization, discharge, etc.); confer with team members; identify outstanding items and prepare/work on draft email/response language to class members; review additional discharge details provided by class members; review bi-weekly report filed by DOJ; confer with D. Baruch re: same.	6.9	\$ 945	\$6,520.50
7/18/2018	St. Romain, Kate	Email D. Baruch and N. Raol regarding discharge papers for named plaintiffs; email plaintiff regarding discharge paperwork; call discharged MAVNI soldiers and email D. Baruch, J. Wollenberg and N. Raol regarding the same; email N. Szlarb regarding MAVNI Dallas field office treatment; review email from D. Baruch regarding government filing.	0.4	\$ 730	\$292.00
7/18/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.2	\$ 545	\$3,379.00
7/18/2018	Wollenberg, Jennifer	Address MAVNI emails, team member emails, emails from common interest counsel; prepare for upcoming filings.	3.5	\$ 1,025	\$3,587.50
7/18/2018	Woods, Elizabeth	Prepare email correspondence to Nio class members.	3.3	\$ 545	\$1,798.50
7/19/2018	Baruch, Douglas W.	Edits and revisions to memoranda; address DOJ correspondence and client calls.	3.5	\$ 1,350	\$4,725.00
7/19/2018	Gates, Shaun	Summary judgment research re: APA claims.	1.6	\$ 785	\$1,256.00
7/19/2018	Raol, Neaha	Research / review material and draft filing in response to court's minute order; confer with D. Baruch re: same; confer with various class members (re: status, discharge, etc.), D. Baruch; confer/correspondence with J. Wollenberg.	6.1	\$ 945	\$5,764.50
7/19/2018	Raol, Neaha	Confer with plaintiff, D. Baruch, J. Wollenberg re: status, next steps; review/confirm DOJ redactions updated.	0.8	\$ 945	\$756.00
7/19/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.1	\$ 545	\$3,869.50
7/19/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including MAVNI emails/calls, common interest emails, and team member discussions.	3.9	\$ 1,025	\$3,997.50
7/19/2018	Woods, Elizabeth	Review and prepare email correspondence to Nio class members.	2.2	\$ 545	\$1,199.00
7/20/2018	Baruch, Douglas W.	Address court memoranda and communications with DOJ; client calls.	4.5	\$ 1,350	\$6,075.00
7/20/2018	Gates, Shaun	Review research re: APA claims.	1.0	\$ 785	\$785.00
7/20/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ.	2.5	\$ 315	\$787.50
7/20/2018	Raol, Neaha	Draft/prepare 7/23 filing per court's minute order; confer with team re: same; confer with various class members, D. Baruch; confer with B. McNamara re: emails to DOJ for various class members; review DOJ filing and accompanying reports on class members; review and correspond re: discharge papers.	9.8	\$ 945	\$9,261.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/20/2018	St. Romain, Kate	Email named plaintiffs regarding bi-weekly reporting; call MAVNI soldiers regarding message to J. Wollenberg; email J. Wollenberg regarding MAVNI soldier naturalization; email E. Woods regarding emails to common interest counsel; call with plaintiff regarding discharge update; review government monthly report and email J. Wollenberg and N. Raol regarding report problems; email MAVNI soldiers regarding government reporting updates.	1.4	\$ 730	\$1,022.00
7/20/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.3	\$ 545	\$3,978.50
7/20/2018	Wollenberg, Jennifer	Address MAVNI issues, concern, and updates, including via emails with MAVNIs, team member emails, and discussions with team members.	4.5	\$ 1,025	\$4,612.50
7/20/2018	Woods, Elizabeth	Review and prepare email correspondence to Nio class members.	2.9	\$ 545	\$1,580.50
7/21/2018	Raol, Neaha	Draft/revise memorandum in response to minute order.	2.5	\$ 945	\$2,362.50
7/21/2018	St. Romain, Kate	Email J. Wollenberg regarding call with plaintiff; email plaintiff regarding government reporting; supplement MAVNI litigation website with government reporting; email J. Wollenberg and N. Raol regarding government reporting.	0.2	\$ 730	\$146.00
7/21/2018	Wollenberg, Jennifer	Address emails re MAVNI issues/concerns/updates.	1.2	\$ 1,025	\$1,230.00
7/21/2018	Woods, Elizabeth	Prepare email correspondence for Nio class members.	1.7	\$ 545	\$926.50
7/22/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.9	\$ 545	\$4,305.50
7/22/2018	Wollenberg, Jennifer	Emails with team members and others re MAVNI concerns/updates/issues; prepare materials for two upcoming filings in Nio action (Magistrate Meriweather).	5.6	\$ 1,025	\$5,740.00
7/23/2018	Baruch, Douglas W.	Edits and revisions to filing re Defendants' reporting; address strategy and DOJ correspondence; review.	5.5	\$ 1,350	\$7,425.00
7/23/2018	Gates, Shaun	Draft summary judgment section.	3.5	\$ 785	\$2,747.50
7/23/2018	Kiziltay Carter, Melis	Assisted with Memorandum in Response to court order.	7.0	\$ 630	\$4,410.00
7/23/2018	LoBue, Joseph J.	Draft summary judgment motion.	3.7	\$ 1,240	\$4,588.00
7/23/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; review hearing transcripts to find support for brief.	2.7	\$ 315	\$850.50
7/23/2018	Raol, Neaha	Draft/revise/prepare filing per court's minute order; confer with D. Baruch, J. Wollenberg, M. Kiziltay re: same and exhibits; confer with K. St. Romain, others re: citations; prepare/finalize exhibits; confer with various class members; review news/media hits re: MAVNI; review updates from common interest counsel.	11.1	\$ 945	\$10,489.50
7/23/2018	St. Romain, Kate	Coordinate supplement to MAVNI litigation website and email J. Wollenberg regarding the same; email J. Wollenberg and N. Raol regarding defendants' report of MAVNIs with administratively closed and denied naturalization application; analyze Court-ordered reporting requirement and email J. Wollenberg and N. Raol regarding the same; prepare memo in response to Court's Order.	1.7	\$ 730	\$1,241.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
7/23/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.2	\$ 545	\$3,924.00
7/23/2018	Wollenberg, Jennifer	Prepare today's filing; address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members; review Government's produced guidance document.	12.8	\$ 1,025	\$13,120.00
7/24/2018	Baruch, Douglas W.	Address status and strategy re discharges and summary judgment; DOJ correspondence; confer with MAVNIs.	3.5	\$ 1,350	\$4,725.00
7/24/2018	Gates, Shaun	Draft summary judgment section.	3.4	\$ 785	\$2,669.00
7/24/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.2	\$ 315	\$693.00
7/24/2018	Raol, Neaha	Review redacted guidance filed by DOJ; confer with various class members; review GSA presolicitation/news articles; confer with C. Wilhelmi, review constitutional law claims research for SJM; review draft for 7/25 filing and D. Baruch comments/edits.	5.5	\$ 945	\$5,197.50
7/24/2018	St. Romain, Kate	Coordinate supplements to MAVNI litigation website; email B. McNamara and J. LoBue regarding Nio inbox responses.	0.3	\$ 730	\$219.00
7/24/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.2	\$ 545	\$3,924.00
7/24/2018	Wollenberg, Jennifer	Address MAVNI updates/concerns/issues, including discussions with MAVNIs, common interest counsel, and internal team members; prepare tomorrow's filing in Nio action per Judge Meriweather's order.	13.5	\$ 1,025	\$13,837.50
7/24/2018	Woods, Elizabeth	Prepare email correspondence for members of the Nio class; conference with J. Wollenberg and N. Szlarb regarding review and preparation of email correspondence with members of the Nio class.	7.8	\$ 545	\$4,251.00
7/25/2018	Baruch, Douglas W.	Edits and revisions to motion re reporting; correspondence with DOJ.	3.8	\$ 1,350	\$5,130.00
7/25/2018	Gates, Shaun	Review/revise response to Defendants' May 30 statement.	5.7	\$ 785	\$4,474.50
7/25/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00
7/25/2018	Raol, Neaha	Draft/revise/finalize response to Defendants proposal for filing; confer with various team members re: same; confer with class members.	6.7	\$ 945	\$6,331.50
7/25/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.0	\$ 545	\$3,815.00
7/25/2018	Wollenberg, Jennifer	Finalize and file document per Judge Meriweather's order; address MAVNI calls/emails/concerns/updates; work with team members re Nio Class Counsel mailbox.	8.4	\$ 1,025	\$8,610.00
7/25/2018	Woods, Elizabeth	Prepare email correspondence for members of the Nio class.	2.9	\$ 545	\$1,580.50
7/26/2018	Gates, Shaun	Revise/draft summary judgment brief re: APA.	4.9	\$ 785	\$3,846.50
7/26/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	4.6	\$ 315	\$1,449.00
7/26/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.7	\$ 545	\$3,106.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/26/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and others.	8.4	\$ 1,025	\$8,610.00
7/27/2018	Gates, Shaun	Revise summary judgment brief; team meeting.	3.6	\$ 785	\$2,826.00
7/27/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.2	\$ 545	\$3,924.00
7/27/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; calls with various MAVNIs; address MAVNI concerns.	15.0	\$ 1,025	\$15,375.00
7/27/2018	Woods, Elizabeth	Review and prepare email correspondence with members of the Nio class.	7.5	\$ 545	\$4,087.50
7/28/2018	Raol, Neaha	Review facts, background and correspondence with class members, common interest counsel, J. Wollenberg.	0.3	\$ 945	\$283.50
7/29/2018	Raol, Neaha	Review correspondence from common interest counsel re: NIAC/status.	0.2	\$ 945	\$189.00
7/29/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	8.2	\$ 545	\$4,469.00
7/29/2018	Woods, Elizabeth	Telephone conference with J. Wollenberg and members of the Nio class regarding preparation of declarations; prepare declarations on behalf of Nio class members.	4.9	\$ 545	\$2,670.50
7/30/2018	Baruch, Douglas W.	Addressing DOJ correspondence and filings.	1.5	\$ 1,350	\$2,025.00
7/30/2018	LoBue, Joseph J.	Review legal research for summary judgment motion.	2.1	\$ 1,240	\$2,604.00
7/30/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	4.6	\$ 315	\$1,449.00
7/30/2018	Raol, Neaha	Review Defendants' response to last week's filings; confer with J. Wollenberg re: same; follow-up/draft response, review case re: class member inquiry; confer with J. Wollenberg re: same;	1.4	\$ 945	\$1,323.00
7/30/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/questions, including discussions with Nio class members, common interest counsel, and team members.	12.3	\$ 1,025	\$12,607.50
7/30/2018	Woods, Elizabeth	Prepare preliminary injunction motion, brief, and proposed order.	6.8	\$ 545	\$3,706.00
7/31/2018	Baruch, Douglas W.	Address summary judgment briefing.	2.2	\$ 1,350	\$2,970.00
7/31/2018	LoBue, Joseph J.	Review legal research for summary judgment motion; draft summary judgment motion.	3.8	\$ 1,240	\$4,712.00
7/31/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ.	1.5	\$ 315	\$472.50
7/31/2018	Raol, Neaha	Review news/articles re: MAVNI; correspondence with S. Gates and review IG report re: clearances.	0.2	\$ 945	\$189.00
7/31/2018	Woods, Elizabeth	Prepare motion for preliminary injunction, accompanying brief, and accompanying proposed order.	7.7	\$ 545	\$4,196.50
8/1/2018	LoBue, Joseph J.	Draft summary judgment motion; review research for summary judgment motion.	3.5	\$ 1,240	\$4,340.00
8/1/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	2.9	\$ 315	\$913.50
8/2/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 315	\$94.50
8/2/2018	Woods, Elizabeth	Review email correspondence with members of the Nio and Kirwa classes.	0.5	\$ 545	\$272.50
8/3/2018	Baruch, Douglas W.	Address DOJ submission.	0.6	\$ 1,350	\$810.00
8/3/2018	Gogadze, Helene	Work on the court filing.	4.0	\$ 960	\$3,840.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
8/3/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class.	5.1	\$ 545	\$2,779.50
8/4/2018	Wollenberg, Jennifer	Emails with team members re Nio class member inquiries.	0.4	\$ 1,025	\$410.00
8/4/2018	Woods, Elizabeth	Review and prepare correspondence to members of the Nio class.	1.6	\$ 545	\$872.00
8/6/2018	Baruch, Douglas W.	Nio address summary judgment and status.	6.5	\$ 1,350	\$8,775.00
8/6/2018	Gogadze, Helene	Work on summary judgment motion.	7.5	\$ 960	\$7,200.00
8/6/2018	LoBue, Joseph J.	Draft summary judgment motion.	6.3	\$ 1,240	\$7,812.00
8/6/2018	Wollenberg, Jennifer	Discussions with MAVNIs re issues/concerns/updates; team member discussions re SJ motion for Nio.	10.2	\$ 1,025	\$10,455.00
8/6/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class.	3.2	\$ 545	\$1,744.00
8/7/2018	Baruch, Douglas W.	Address partial summary judgment motion and related filings; research re same; correspondence with DOJ; internal meetings.	9.5	\$ 1,350	\$12,825.00
8/7/2018	Gogadze, Helene	Work on summary judgment motion.	9.0	\$ 960	\$8,640.00
8/7/2018	LoBue, Joseph J.	Draft summary judgment motion.	5.9	\$ 1,240	\$7,316.00
8/7/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	1.9	\$ 315	\$598.50
8/7/2018	Raol, Neaha	Follow-up re: DOD IG report; confer/correspond with various team members including B. McNamara, K. Kaplan (re: SJM).	0.7	\$ 945	\$661.50
8/7/2018	Stachniak Kaplan, Kayla	Prepare summary judgment brief on Naturalization Clause violation and legal research regarding the same.	7.4	\$ 960	\$7,104.00
8/7/2018	Wollenberg, Jennifer	Discussions with MAVNIs re naturalization issues/concerns/updates; emails to DOJ re Nio issues; discuss Nio notice with D. Baruch; team meeting re SJ briefing and follow-on discussions/work re same.	12.5	\$ 1,025	\$12,812.50
8/7/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class.	4.7	\$ 545	\$2,561.50
8/8/2018	Baruch, Douglas W.	DOJ correspondence; research and drafting re PSJ motion.	6.6	\$ 1,350	\$8,910.00
8/8/2018	Gogadze, Helene	Work on SJ motion.	9.4	\$ 960	\$9,024.00
8/8/2018	LoBue, Joseph J.	Draft summary judgment motion.	7.6	\$ 1,240	\$9,424.00
8/8/2018	McNamara, Brendan	Respond to soldiers' emails re naturalization; draft emails to DOJ.	6.3	\$ 315	\$1,984.50
8/8/2018	Stachniak Kaplan, Kayla	Prepare summary judgment brief on Naturalization Clause violation and legal research regarding the same.	2.4	\$ 960	\$2,304.00
8/8/2018	Wollenberg, Jennifer	Emails to DOJ re Nio class problems; discussions with MAVNIs, team members, and common interest counsel re Nio issues; prepare/review SJ pieces for Nio action..	10.6	\$ 1,025	\$10,865.00
8/8/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class; review provisions of House Bill.	6.0	\$ 545	\$3,270.00
8/9/2018	Baruch, Douglas W.	Drafting and revising partial summary judgment papers.	8.5	\$ 1,350	\$11,475.00
8/9/2018	Gogadze, Helene	Drafting summary judgment motion.	9.2	\$ 960	\$8,832.00
8/9/2018	LoBue, Joseph J.	Team meeting on summary judgment motion; draft, edit summary judgment motion.	4.3	\$ 1,240	\$5,332.00
8/9/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	4.1	\$ 315	\$1,291.50
8/9/2018	Raol, Neaha	Team meeting re: SJM; review draft SJM brief; draft constitutional claims section; review/draft portion of SJM.	5.8	\$ 945	\$5,481.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/9/2018	Stachniak Kaplan, Kayla	Prepare summary judgment brief on Naturalization Clause violation and legal research regarding the same; discuss case with team members.	7.5	\$ 960	\$7,200.00
8/9/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; emails with DOJ re MAVNI issues; work on SJ brief materials; discussions with team members.	13.2	\$ 1,025	\$13,530.00
8/10/2018	Baruch, Douglas W.	Address partial summary judgment motion and related filings; calls and meetings re same; DOJ correspondence.	9.5	\$ 1,350	\$12,825.00
8/10/2018	Gogadze, Helene	Work on motion for SJ.	8.6	\$ 960	\$8,256.00
8/10/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	2.9	\$ 315	\$913.50
8/10/2018	Raol, Neaha	Confer with D. Baruch, J. Wollenberg re: counts/claims in complaint and SJM implications; draft/revise, legal research re: N-426 policy/ APA 706(2) claim and constitutional claims; review appendix items; confer/correspondence with class members re: status; confer with D. Baruch, J. Wollenberg, J. LoBue, H. Gogadze, K. Kaplan re: SJM - status, potential arguments, etc.	7.5	\$ 945	\$7,087.50
8/10/2018	Stachniak Kaplan, Kayla	Prepare summary judgment brief; discuss case with team members.	6.3	\$ 960	\$6,048.00
8/10/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and others; emails with DOJ re MAVNI issues; work on SJ brief materials; discussions with team members.	12.5	\$ 1,025	\$12,812.50
8/11/2018	Baruch, Douglas W.	Drafting partial summary judgment motion and related filings.	4.0	\$ 1,350	\$5,400.00
8/11/2018	Gogadze, Helene	Address SJ motion draft.	2.2	\$ 960	\$2,112.00
8/11/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00
8/11/2018	Stachniak Kaplan, Kayla	Prepare and cite check summary judgment brief.	4.5	\$ 960	\$4,320.00
8/11/2018	Wollenberg, Jennifer	Work on PSJ motion.	12.8	\$ 1,025	\$13,120.00
8/12/2018	Baruch, Douglas W.	Drafting partial summary judgment motion and related filings.	3.5	\$ 1,350	\$4,725.00
8/12/2018	Gogadze, Helene	Work on summary judgment motion.	4.3	\$ 960	\$4,128.00
8/12/2018	Stachniak Kaplan, Kayla	Prepare summary judgment motion and order.	0.8	\$ 960	\$768.00
8/12/2018	Wollenberg, Jennifer	Work on PSJ motion.	16.7	\$ 1,025	\$17,117.50
8/13/2018	Baruch, Douglas W.	Drafting and finalizing motion for partial summary judgment.	8.5	\$ 1,350	\$11,475.00
8/13/2018	Gogadze, Helene	Work on SJ draft.	9.8	\$ 960	\$9,408.00
8/13/2018	Raol, Neaha	Draft/revise/finalize summary judgment motion; confer with various team members re: same; correspondence with class members, common interest counsel.	7.7	\$ 945	\$7,276.50
8/13/2018	St. Romain, Kate	Call and email J. Wollenberg regarding mandamus research for summary judgment; respond to MAVNI soldier emails; update MAVNI litigation website; email plaintiff regarding summary judgment and meeting with Judge.	1.0	\$ 730	\$730.00
8/13/2018	Stachniak Kaplan, Kayla	Prepare Nio summary judgment brief; discuss cases with D. Baruch, J. Wollenberg, and N. Szlarb.	5.8	\$ 960	\$5,568.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/13/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.1	\$ 545	\$3,324.50
8/13/2018	Wollenberg, Jennifer	Partial summary judgment motion in Nio; address MAVNI questions/issues/updates.	14.4	\$ 1,025	\$14,760.00
8/14/2018	Baruch, Douglas W.	Address and prepare for court call; DOJ correspondence; confer with team.	2.5	\$ 1,350	\$3,375.00
8/14/2018	Baruch, Douglas W.	Address information re Army JAG review; team meeting re status/strategy; research re professional rules.	3.5	\$ 1,350	\$4,725.00
8/14/2018	Raol, Neaha	Confer with D. Baruch, J. Wollenberg, common interest counsel re: updates/status; correspondence with various class members, follow-up re: same.	3.2	\$ 945	\$3,024.00
8/14/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	4.8	\$ 545	\$2,616.00
8/14/2018	Wollenberg, Jennifer	Address MAVNI issues, including calls/emails with MAVNIs, common interest counsel, and team members.	9.6	\$ 1,025	\$9,840.00
8/14/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class.	2.2	\$ 545	\$1,199.00
8/15/2018	Baruch, Douglas W.	Conference call with Court; review DOJ submissions; DOJ correspondence; address status and strategy.	3.5	\$ 1,350	\$4,725.00
8/15/2018	Raol, Neaha	Review status update filed by DOJ; confer with court, DOJ; prep/follow-up with team members re: same; confer with class members.	1.6	\$ 945	\$1,512.00
8/15/2018	St. Romain, Kate	Call with MAVNI soldier regarding naturalization; telephone conference with Judge Huvelle regarded change in reporting.	1.5	\$ 730	\$1,095.00
8/15/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ; conference call with the court.	4.9	\$ 545	\$2,670.50
8/15/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and others; conference call with Court in Nio action.	10.3	\$ 1,025	\$10,557.50
8/15/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class; observe telephone conference with Judge Huvelle and Defendants' counsel; review complaint and other docket entries in similar case.	5.6	\$ 545	\$3,052.00
8/16/2018	Baruch, Douglas W.	DOJ correspondence; soldier correspondence; review materials and confer with team.	3.0	\$ 1,350	\$4,050.00
8/16/2018	Raol, Neaha	Review various DOJ correspondence; confer with class members; review material/status info from E. Woods, other team members re: various tasks; confer with team members re: same.	2.8	\$ 945	\$2,646.00
8/16/2018	St. Romain, Kate	Meet J. Wollenberg regarding MAVNI soldier follow-ups and Nio plan; email named plaintiffs regarding filing updates and MAVNI litigation status; meet with D. Baruch and J. Wollenberg regarding website; arrange calls with named MAVNI plaintiffs.	1.2	\$ 730	\$876.00
8/16/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.2	\$ 545	\$3,379.00
8/16/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and team members.	8.2	\$ 1,025	\$8,405.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/16/2018	Woods, Elizabeth	Review complaint and other docket entries in similar case.	3.2	\$ 545	\$1,744.00
8/17/2018	Baruch, Douglas W.	Address DOJ correspondence; call with common interest counsel; address reporting and strategy.	3.5	\$ 1,350	\$4,725.00
8/17/2018	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; prepare email communications with government counsel; discuss case with D. Baruch and J. Wollenberg.	0.7	\$ 960	\$672.00
8/17/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.8	\$ 545	\$2,071.00
8/17/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, DOJ, common interest counsel, and team members.	8.0	\$ 1,025	\$8,200.00
8/17/2018	Woods, Elizabeth	Review complaint and other docket entries in similar case; prepare summary of complaint; perform analysis on applicability of legal issues to other fact patterns; prepare email summarizing analysis to J. Wollenberg and N. Raol.	6.4	\$ 545	\$3,488.00
8/18/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	2.8	\$ 545	\$1,526.00
8/18/2018	Wollenberg, Jennifer	Emails/calls from MAVNIs and common interest counsel re updates and concerns; emails to team members re same.	0.5	\$ 1,025	\$512.50
8/19/2018	Wollenberg, Jennifer	Address emails re MAVNI issues/concerns/updates.	0.3	\$ 1,025	\$307.50
8/20/2018	Baruch, Douglas W.	Call with common interest counsel; confer with team; review documents re status and strategy.	3.2	\$ 1,350	\$4,320.00
8/20/2018	Kiziltay Carter, Melis	Review the August report and prepare a summary of the ongoing issues.	3.1	\$ 630	\$1,953.00
8/20/2018	Raol, Neaha	Review articles re: legal developments for MAVNIs/lawsuit and internal correspondence with various team members re: same; review correspondence from class members.	1.3	\$ 945	\$1,228.50
8/20/2018	Stachniak Kaplan, Kayla	Analyze Nio and Calixto reporting.	0.5	\$ 960	\$480.00
8/20/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	7.2	\$ 545	\$3,924.00
8/20/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including communications with MAVNIs, joint defense counsel, and team members.	9.3	\$ 1,025	\$9,532.50
8/21/2018	Baruch, Douglas W.	Address reporting and strategy; DOJ correspondence; confer with team.	2.2	\$ 1,350	\$2,970.00
8/21/2018	Raol, Neaha	Confer with various clients/class members re: status, updates, etc.; review reporting on class members from defendants and confer with various FF team members re: same; review various legal articles re: class action/discharges; confer with S. Gates re: drafting papers; confer with D. Baruch, J. Wollenberg re: current/outstanding issues and legal analysis/arguments.	6.2	\$ 945	\$5,859.00
8/21/2018	St. Romain, Kate	Email naturalized named plaintiffs, and plaintiff litigation update.	0.2	\$ 730	\$146.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/21/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ; discuss potential ethical violations of the government lawyers with Doug Baruch, Jennifer Wollenberg and Kayla Kaplan.	6.3	\$ 545	\$3,433.50
8/21/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and common interest counsel.	7.9	\$ 1,025	\$8,097.50
8/22/2018	Baruch, Douglas W.	Address MAVNI naturalization eligibility issues and research re same.	2.5	\$ 1,350	\$3,375.00
8/22/2018	Kiziltay Carter, Melis	Attend team meeting to discuss the outstanding issues in the August report.	0.8	\$ 630	\$504.00
8/22/2018	Raol, Neaha	Various conferences with class members; confer with N. Szlarb re: email correspondence with class members/inquiry responses and draft/revise emails; confer with S. Gates re: draft papers/legal arguments, additional factual background and review legal authority/references; follow-up re: transcript request and review transcript upon receipt; review articles and government quotes/statements re: lawsuit.	3.8	\$ 945	\$3,591.00
8/22/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ; discuss communications with Jennifer Wollenberg.	6.3	\$ 545	\$3,433.50
8/22/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including through discussions with MAVNIs, common interest counsel, and team members; discuss issues with Government's reporting in Nio.	9.5	\$ 1,025	\$9,737.50
8/23/2018	Baruch, Douglas W.	Address MAVNI naturalization eligibility issues and legal research re same.	3.2	\$ 1,350	\$4,320.00
8/23/2018	Kiziltay Carter, Melis	Prepare a draft email to the government about the August report.	3.1	\$ 630	\$1,953.00
8/23/2018	Raol, Neaha	Various correspondence with common interest counsel re: status/update on various class members; review client's CI result/FOIA material provided to class members; confer with class members, correspond with FF team re: Friday meeting with clients; confer with S. Gates re: draft papers, factual background, theme.	3.7	\$ 945	\$3,496.50
8/23/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.6	\$ 545	\$3,597.00
8/23/2018	Wollenberg, Jennifer	Discussions with MAVNIs, common interest counsel, DOJ, and team members re MAVNI issues/concerns/updates in Nio.	9.8	\$ 1,025	\$10,045.00
8/24/2018	Kiziltay Carter, Melis	Meeting with some class members; address class member issues.	5.5	\$ 630	\$3,465.00
8/24/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	2.0	\$ 315	\$630.00
8/24/2018	Raol, Neaha	Review material from S. Gates; conference/correspondence with class members re: status, updates, inquiries; correspondence with common interest counsel re: class members status; confer with J. Wollenberg re: particular class member issues/updates.	4.0	\$ 945	\$3,780.00
8/24/2018	Stachniak Kaplan, Kayla	Meet with MAVNI soldiers.	0.4	\$ 960	\$384.00
8/24/2018	Szlarb, Natalia	Draft email to DOJ highlighting problems with the government report.	2.3	\$ 545	\$1,253.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/24/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates, including discussions with MAVNIs, team members, and others.	8.7	\$ 1,025	\$8,917.50
8/25/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.7	\$ 315	\$220.50
8/26/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.5	\$ 315	\$157.50
8/26/2018	St. Romain, Kate	Prepare analysis comparing August-July government reporting; email N. Szlarb and J. Wollenberg regarding government reporting analysis.	0.7	\$ 730	\$511.00
8/26/2018	Wollenberg, Jennifer	Address emails re MAVNI issues/concerns/updates.	0.5	\$ 1,025	\$512.50
8/27/2018	Baruch, Douglas W.	Address client questions; DOJ correspondence; reporting issues.	2.5	\$ 1,350	\$3,375.00
8/27/2018	Baruch, Douglas W.	Address discharge developments and confer with J. Wollenberg.	1.5	\$ 1,350	\$2,025.00
8/27/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.5	\$ 315	\$787.50
8/27/2018	Raol, Neaha	Confer with class members; various correspondence with class members, common interest counsel, internal team re: status, developments; updates.	3.1	\$ 945	\$2,929.50
8/27/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	1.2	\$ 545	\$654.00
8/27/2018	Wollenberg, Jennifer	Emails/discussions with MAVNIs, common interest counsel, and team members re MAVNIs issues, concerns, and updates; draft emails to DOJ re same.	9.8	\$ 1,025	\$10,045.00
8/28/2018	Baruch, Douglas W.	Address correspondence with DOJ and strategy; address monthly report issues.	2.5	\$ 1,350	\$3,375.00
8/28/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ.	0.7	\$ 315	\$220.50
8/28/2018	Raol, Neaha	Draft/revise new complaint/pleading; review relevant Nio transcripts.	3.4	\$ 945	\$3,213.00
8/28/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.6	\$ 545	\$1,962.00
8/28/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates; prepare website update.	8.8	\$ 1,025	\$9,020.00
8/29/2018	Baruch, Douglas W.	DOJ correspondence and call with common interest counsel; address DOJ filings.	2.5	\$ 1,350	\$3,375.00
8/29/2018	Raol, Neaha	Confer with class members; review news/legal updates re: government comments on MAVNI.	0.8	\$ 945	\$756.00
8/29/2018	Raol, Neaha	Draft complaint / review transcripts and supporting documentation re: same.	3.0	\$ 945	\$2,835.00
8/29/2018	St. Romain, Kate	Review website; email named plaintiffs regarding bi-weekly report.	0.2	\$ 730	\$146.00
8/29/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.6	\$ 545	\$1,962.00
8/29/2018	Wollenberg, Jennifer	Address MAVNI issues, updates, and concerns; draft emails to DOJ.	10.2	\$ 1,025	\$10,455.00
8/30/2018	Baruch, Douglas W.	Address DOJ correspondence and strategy.	2.5	\$ 1,350	\$3,375.00
8/30/2018	Gogadze, Helene	Work on MAVNI filing.	3.0	\$ 960	\$2,880.00
8/30/2018	Raol, Neaha	Confer with class member.	0.9	\$ 945	\$850.50
8/30/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	3.9	\$ 545	\$2,125.50
8/30/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; emails to DOJ re problems with reporting and other issues.	10.5	\$ 1,025	\$10,762.50
8/31/2018	Raol, Neaha	Confer/correspond with various class members re: status/updates, etc.	1.2	\$ 945	\$1,134.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
8/31/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	6.1	\$ 545	\$3,324.50
8/31/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; emails to DOJ re MAVNI issues.	8.2	\$ 1,025	\$8,405.00
9/3/2018	Gogadze, Helene	Work on the MAVNI SJ filing.	10.5	\$ 960	\$10,080.00
9/4/2018	Baruch, Douglas W.	Address various motions and confer with counsel and consultants.	3.5	\$ 1,350	\$4,725.00
9/4/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	2.1	\$ 315	\$661.50
9/4/2018	Raol, Neaha	Confer with various class members; identify/correspondence internally and with class member re: counsel; draft complaint.	3.1	\$ 960	\$2,976.00
9/4/2018	Wollenberg, Jennifer	Address MAVNI concerns/issues/updates, including discussions with MAVNIs and emails to DOJ; address DOJ "protective order" and related issues.	10.8	\$ 1,025	\$11,070.00
9/5/2018	Baruch, Douglas W.	Address DOJ correspondence and protective order issues.	2.0	\$ 1,350	\$2,700.00
9/5/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to the DOJ.	1.8	\$ 315	\$567.00
9/5/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and DOJ.	11.6	\$ 1,025	\$11,890.00
9/6/2018	Baruch, Douglas W.	Address DOJ correspondence and strategy.	3.5	\$ 1,350	\$4,725.00
9/6/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00
9/6/2018	Raol, Neaha	Confer/correspond with various class members and team members; review filing re: extension; review additional docket entries; correspondence with common interest counsel re: docket update; review material/documents/information provided by class members.	3.8	\$ 960	\$3,648.00
9/6/2018	St. Romain, Kate	Edit Nio Response to extension request.	0.6	\$ 785	\$471.00
9/6/2018	Stachniak Kaplan, Kayla	Analyze motions for protective orders.	0.5	\$ 960	\$480.00
9/6/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	4.8	\$ 630	\$3,024.00
9/6/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and common interest counsel.	7.8	\$ 1,025	\$7,995.00
9/7/2018	Baruch, Douglas W.	Client calls and strategy; address motions.	2.5	\$ 1,350	\$3,375.00
9/7/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	5.4	\$ 630	\$3,402.00
9/7/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and common interest counsel; emails to DOJ.	4.2	\$ 1,025	\$4,305.00
9/9/2018	St. Romain, Kate	Email common interest counsel regarding documents.	0.3	\$ 785	\$235.50
9/9/2018	Wollenberg, Jennifer	Emails to team members re MAVNI naturalization issue and communication with common interest counsel.	0.4	\$ 1,025	\$410.00
9/10/2018	Baruch, Douglas W.	Address DOJ correspondence and MAVNI litigation.	2.5	\$ 1,350	\$3,375.00
9/10/2018	Kiziltay Carter, Melis	Work on descriptions of class members' naturalization issues.	7.0	\$ 730	\$5,110.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/10/2018	Raol, Neaha	Confer with M. Kiziltay re: correspondence with class members; review underlying material and draft pleadings / confer with M. Kiziltay, J. Wollenberg re: same; various correspondence with class members/potential class members.	4.9	\$ 960	\$4,704.00
9/10/2018	Szlarb, Natalia	Respond to Nio class members communications.	4.8	\$ 630	\$3,024.00
9/10/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates, including discussions with MAVNIs, common interest counsel, and internal team members.	10.5	\$ 1,025	\$10,762.50
9/11/2018	Baruch, Douglas W.	DOJ correspondence and address protective order issues; confer with J. Wollenberg re status and strategy.	5.5	\$ 1,350	\$7,425.00
9/11/2018	Kiziltay Carter, Melis	Work on descriptions/summaries of class members' naturalization issues.	2.0	\$ 730	\$1,460.00
9/11/2018	Raol, Neaha	Review filings from related MAVNI action (MTD papers); confer with M. Kiziltay and review/revise complaint insert; draft complaint sections; review news re: subject matter/case.	3.4	\$ 960	\$3,264.00
9/11/2018	Szlarb, Natalia	Respond to Nio class members communications; update the table with details of the Nio class members; draft e-mails to DOJ.	2.5	\$ 630	\$1,575.00
9/11/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates, including discussions with MAVNIs, common interest counsel, and internal team members.	9.7	\$ 1,025	\$9,942.50
9/12/2018	Baruch, Douglas W.	Respond to DOJ correspondence and address DOJ motion and report; address litigation strategy.	3.5	\$ 1,350	\$4,725.00
9/12/2018	Kiziltay Carter, Melis	Work on descriptions of class member naturalization problems and team discussions re same.	4.5	\$ 730	\$3,285.00
9/12/2018	Raol, Neaha	Confer/draft email correspondence re: MAVNI inquiries; draft complaint; review DOJ reports filed re: named plaintiffs and papers filed re: class reporting; confer with D. Baruch, M. Kiziltay re: strategy/status/legal arguments.	6.8	\$ 960	\$6,528.00
9/12/2018	St. Romain, Kate	Review bi-weekly status report; email J. Wollenberg regarding analysis of bi-weekly status report.	0.2	\$ 785	\$157.00
9/12/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.3	\$ 630	\$1,449.00
9/12/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates, including discussions with MAVNIs, common interest counsel, and internal team members.	6.6	\$ 1,025	\$6,765.00
9/13/2018	Baruch, Douglas W.	Address summary judgment opposition, DOJ correspondence, strategy.	5.5	\$ 1,350	\$7,425.00
9/13/2018	Kiziltay Carter, Melis	Discuss class members' naturalization problems due to USCIS and other ongoing issues in the class actions.	1.5	\$ 730	\$1,095.00
9/13/2018	McNamara, Brendan	Respond to soldiers' email regarding naturalization; draft emails to DOJ.	1.1	\$ 315	\$346.50
9/13/2018	Raol, Neaha	Confer with D. Baruch, J. Wollenberg, M. Kiziltay re: status/next steps; review reporting from DOJ re: class members; confer with Nio class members; follow-up correspondence/info re: class members and USCIS appellate procedure.	5.2	\$ 960	\$4,992.00
9/13/2018	Szlarb, Natalia	Audit the Nio Mailbox.	2.6	\$ 630	\$1,638.00
9/13/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates, including discussions with MAVNIs, common interest counsel, and internal team members.	9.8	\$ 1,025	\$10,045.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/14/2018	Baruch, Douglas W.	Address summary judgment, protective order, DOJ correspondence and strategy.	4.5	\$ 1,350	\$6,075.00
9/14/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ.	1.1	\$ 315	\$346.50
9/14/2018	Raol, Neaha	Confer with J. Wollenberg re: class member call/prep; confer with various class members; confer/email correspondence with D. Baruch re: draft correspondence to class members; review defendants' cross-motion for summary judgment/opposition brief.	3.7	\$ 960	\$3,552.00
9/14/2018	Stachniak Kaplan, Kayla	Discuss case with D. Baruch; review reporting; analyze Defendants' summary judgment cross-motion/opposition.	2.2	\$ 960	\$2,112.00
9/14/2018	Szlarb, Natalia	Respond to Nio class members communications.	1.8	\$ 630	\$1,134.00
9/14/2018	Wollenberg, Jennifer	Address MAVNI issues, concerns, and updates, including discussions with MAVNIs, common interest counsel, and internal team members.	8.3	\$ 1,025	\$8,507.50
9/16/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.6	\$ 630	\$1,638.00
9/16/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including emails with MAVNIs, team members, and Defendants.	4.2	\$ 1,025	\$4,305.00
9/17/2018	Baruch, Douglas W.	Address summary judgment motion and DOJ correspondence.	5.2	\$ 1,350	\$7,020.00
9/17/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft emails to DOJ.	1.7	\$ 315	\$535.50
9/17/2018	Raol, Neaha	Confer with various class members via telephone and email; legal research/legislative history re: 1440 for constitutional claims section of SJM reply brief; draft email for DOJ re: class member.	4.6	\$ 960	\$4,416.00
9/17/2018	Stachniak Kaplan, Kayla	Analyze summary judgment opposition; legal research distinguishing constitutional cases in summary judgment opposition; discuss case with J. Wollenberg.	3.7	\$ 960	\$3,552.00
9/17/2018	Szlarb, Natalia	Respond to Nio class members communications.	3.1	\$ 630	\$1,953.00
9/17/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and common interest counsel; prepare responses to file in cases.	8.3	\$ 1,025	\$8,507.50
9/18/2018	Baruch, Douglas W.	Team meeting re summary judgment opposition; legal research; DOJ correspondence.	2.5	\$ 1,350	\$3,375.00
9/18/2018	Kiziltay Carter, Melis	Attend MAVNI meeting to discuss the government's response to our summary judgment motion.	1.2	\$ 730	\$876.00
9/18/2018	McNamara, Brendan	Attend MAVNI team meeting; respond to emails regarding soldiers' naturalization applications.	5.4	\$ 315	\$1,701.00
9/18/2018	Raol, Neaha	Correspondence with various class members (via email and telephone); review material and follow-up with class members via email; confer/correspondence with J. Wollenberg, N. Szlarb re: same; team meeting; review/revise/cite-check objections to ex parte filing; confer with K. Kaplan re: SJM response/opposition to cross-motion.	5.8	\$ 960	\$5,568.00
9/18/2018	St. Romain, Kate	Attend team meeting regarding summary judgment reply; coordinate supplements to MAVNI litigation website; email team regarding Law360 coverage of summary judgment cross-motion/opposition.	1.0	\$ 785	\$785.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/18/2018	Stachniak Kaplan, Kayla	Discuss case with team members.	1.1	\$ 960	\$1,056.00
9/18/2018	Szlarb, Natalia	Respond to Nio class members communications; conference with the MAVNI team regarding the summary judgment.	4.1	\$ 630	\$2,583.00
9/18/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, team members, and others; analyze SJ materials and team discussion re that and other issues.	9.5	\$ 1,025	\$9,737.50
9/18/2018	Woods, Elizabeth	Review filings and prepare summary of Defendants' motion to dismiss in similar case; review Defendants' cross motion for summary judgment in Nio; conference with Nio team regarding preparation of motion to dismiss reply and opposition.	6.9	\$ 630	\$4,347.00
9/19/2018	Kiziltay Carter, Melis	Address government's response to summary judgment arguments; review the September report.	1.2	\$ 730	\$876.00
9/19/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization applications.	0.6	\$ 315	\$189.00
9/19/2018	Raol, Neaha	Confer with J. Wollenberg re: legal and factual research; draft sections of brief; review/revise draft brief; incorporate edits and comments; finalize exhibit and check citations; review court's minute order.	11.1	\$ 960	\$10,656.00
9/19/2018	St. Romain, Kate	Email N. Szlarb regarding government reporting; analyze government reporting.	0.9	\$ 785	\$706.50
9/19/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.8	\$ 630	\$1,764.00
9/19/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare filings in response to government protection motions, etc.; discussions with team members and others re SJ and related issues.	16.3	\$ 1,025	\$16,707.50
9/19/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class.	1.1	\$ 630	\$693.00
9/20/2018	Baruch, Douglas W.	Summary judgment analysis; DOJ correspondence; meeting w. common interest counsel.	6.5	\$ 1,350	\$8,775.00
9/20/2018	Kiziltay Carter, Melis	Address governments' response to our summary judgment arguments; draft argument.	6.5	\$ 730	\$4,745.00
9/20/2018	McNamara, Brendan	Draft motion sections on retroactivity and notice and comment rulemaking for motion for summary judgment.	12.2	\$ 315	\$3,843.00
9/20/2018	Raol, Neaha	Confer with common interest counsel, D. Baruch, J. Wollenberg, K. Kaplan, K. St. Romain re: various items; confer with class members / follow-up and review materials sent; confer with K. Kaplan re: constitutional claims/SJM response/opposition to cross-motion; prep for and confer with M. Kiziltay Carter re: SJM reply brief argument on Oct. 13 policy.	5.2	\$ 960	\$4,992.00
9/20/2018	St. Romain, Kate	Email team regarding summary judgment cases; meet with team members and common interest counsel.	1.7	\$ 785	\$1,334.50
9/20/2018	Stachniak Kaplan, Kayla	Discuss case with common interest counsel, team members; prepare reply/opposition to summary judgment.	4.2	\$ 960	\$4,032.00
9/20/2018	Szlarb, Natalia	Respond to Nio class members communications.	1.3	\$ 630	\$819.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/20/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare upcoming filings; discussions re SJ arguments, etc.	11.3	\$ 1,025	\$11,582.50
9/20/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class; conference with J. Wollenberg regarding drafting portions of summary judgment reply brief.	2.8	\$ 630	\$1,764.00
9/21/2018	Baruch, Douglas W.	Summary judgment opposition and reply; call w. common interest counsel; DOJ correspondence.	4.8	\$ 1,350	\$6,480.00
9/21/2018	Kiziltay Carter, Melis	Draft argument; draft email to the government; read our partial summary judgment motion.	5.0	\$ 730	\$3,650.00
9/21/2018	McNamara, Brendan	Draft motion sections on retroactivity and notice and comment rulemaking for motion for summary judgment.	8.3	\$ 315	\$2,614.50
9/21/2018	Raol, Neaha	Confer / correspondence with numerous class members; follow-up with various team members re: same and draft emails to DOJ; confer with M. Kiziltay Carter re: Nio SJM response/cited documents and prior filings/orders.	2.7	\$ 960	\$2,592.00
9/21/2018	Stachniak Kaplan, Kayla	Prepare Naturalization Clause section of reply in support of/opposition to summary judgment.	5.1	\$ 960	\$4,896.00
9/21/2018	Szlarb, Natalia	Respond to Nio class members communications.	3.3	\$ 630	\$2,079.00
9/21/2018	Wollenberg, Jennifer	Address MAVNI issues, updates, and concerns; work on SJ arguments; discussions with team members and others.	8.9	\$ 1,025	\$9,122.50
9/21/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class.	1.1	\$ 630	\$693.00
9/23/2018	Baruch, Douglas W.	Address motions.	1.3	\$ 1,350	\$1,755.00
9/23/2018	Kiziltay Carter, Melis	Draft argument re Government position.	2.5	\$ 730	\$1,825.00
9/24/2018	Baruch, Douglas W.	Draft response to Defendants' Notice; address summary judgment and strategy; emails to counsel.	5.5	\$ 1,350	\$7,425.00
9/24/2018	Raol, Neaha	Team meeting; confer/correspondence with class members; review press reports re: MAVNI program; review filing re: September 21 notice.	2.4	\$ 960	\$2,304.00
9/24/2018	St. Romain, Kate	Email J. LoBue regarding reply/opposition to summary judgment motion; email J. Wollenberg regarding FOIA complaint; email L. Woods regarding summary judgment.	0.2	\$ 785	\$157.00
9/24/2018	Stachniak Kaplan, Kayla	Prepare constitutional arguments for Opposition to/Reply in Support of Summary Judgment; prepare Opposition to Defendants' Notice.	4.9	\$ 960	\$4,704.00
9/24/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.2	\$ 630	\$1,386.00
9/24/2018	Wollenberg, Jennifer	Address MAVNI issues, including emails with MAVNIs and others; prepare filing.	13.1	\$ 1,025	\$13,427.50
9/24/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class; review transcripts of hearings in Nio; review Defendants' and Plaintiffs' docket filings in Nio; prepare portion of Plaintiffs' reply brief and opposition to Defendants' motion for summary judgment regarding inconsistencies in Defendants' policies.	6.0	\$ 630	\$3,780.00
9/25/2018	Baruch, Douglas W.	Team meeting; address summary judgment; DOJ correspondence.	3.8	\$ 1,350	\$5,130.00
9/25/2018	Kiziltay Carter, Melis	MAVNI meeting to discuss status of the cases.	1.8	\$ 730	\$1,314.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/25/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft summary judgment motion.	6.8	\$ 315	\$2,142.00
9/25/2018	Raol, Neaha	Confer with class members; team meeting re: status, strategy, and next steps; confer with K. Kaplan re: constitutional claims/SJM reply brief; review news/articles re: MAVNIs/Army.	2.1	\$ 960	\$2,016.00
9/25/2018	St. Romain, Kate	Review media coverage of MAVNI program; email regarding FOIA complaint; edit response to September 21 notice and email J. Wollenberg regarding the same; attend team meeting regarding MAVNI litigation status and plan; email team regarding NYT recruitment article.	2.4	\$ 785	\$1,884.00
9/25/2018	Stachniak Kaplan, Kayla	Prepare constitutional sections of Opposition to/Reply in support of summary judgment; discuss case with team members.	4.3	\$ 960	\$4,128.00
9/25/2018	Szlarb, Natalia	Conference to discuss summary judgment motion with the team; conference with DOJ attorneys; draft an outline of factual section for a summary judgment; respond to Nio class members communications.	2.8	\$ 630	\$1,764.00
9/25/2018	Wollenberg, Jennifer	Prepare and finalize filing; address MAVNI issues/concerns/updates, including conversations with MAVNIs and others; team meeting.	14.2	\$ 1,025	\$14,555.00
9/25/2018	Woods, Elizabeth	Review and prepare correspondence with members of the Nio class; prepare draft of portion of Plaintiffs' reply and opposition to Defendants' summary judgment motion brief regarding inconsistencies in Defendants' policies.	2.7	\$ 630	\$1,701.00
9/26/2018	Baruch, Douglas W.	Address summary judgment and status; correspondence with DOJ; review DOJ filings.	3.8	\$ 1,350	\$5,130.00
9/26/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft summary judgment motion.	2.3	\$ 315	\$724.50
9/26/2018	Raol, Neaha	Confer with class members; team meeting re: status, strategy, and next steps; confer with K. Kaplan re: constitutional claims/SJM reply brief; review news/articles re: MAVNIs/Army.	2.4	\$ 960	\$2,304.00
9/26/2018	St. Romain, Kate	Meet with J. Wollenberg regarding government reporting problems; email J. Wollenberg regarding status update to named plaintiffs; email named plaintiffs regarding litigation status; email B. McNamara regarding soldier status updates.	1.2	\$ 785	\$942.00
9/26/2018	Szlarb, Natalia	Draft an outline of factual section for a summary judgment; respond to Nio class members communications.	2.4	\$ 630	\$1,512.00
9/26/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, common interest counsel, and team members; emails to DOJ/USCIS.	13.3	\$ 1,025	\$13,632.50
9/26/2018	Woods, Elizabeth	Conference with J. Wollenberg regarding preparation of section of Plaintiffs' reply and opposition brief in response to Defendants' summary judgment motion.	0.4	\$ 630	\$252.00
9/27/2018	Baruch, Douglas W.	DOJ correspondence; summary judgment research.	2.5	\$ 1,350	\$3,375.00
9/27/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft summary judgment motion.	3.7	\$ 315	\$1,165.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
9/27/2018	Raol, Neaha	Confer with class members; confer with K. Kaplan re: constitutional claims section of SJM.	0.8	\$ 960	\$768.00
9/27/2018	Stachniak Kaplan, Kayla	Analyze government reporting; discuss summary judgment opposition with N. Raol.	0.6	\$ 960	\$576.00
9/27/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, common interest counsel, and team members; emails to DOJ/USCIS.	12.9	\$ 1,025	\$13,222.50
9/28/2018	Baruch, Douglas W.	Call with client; DOJ meet and confer; address summary judgment arguments.	4.0	\$ 1,350	\$5,400.00
9/28/2018	Kiziltay Carter, Melis	Meet and Confer call with Government.	1.1	\$ 730	\$803.00
9/28/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft summary judgment motion.	1.7	\$ 315	\$535.50
9/28/2018	Raol, Neaha	Confer with class members; confer with K. Kaplan re: constitutional claims/SJM reply brief; review news/articles re: MAVNIs/Army.	1.5	\$ 960	\$1,440.00
9/28/2018	St. Romain, Kate	Coordinate call with plaintiff; attend meet and confer and post-meet and confer team meeting.	1.2	\$ 785	\$942.00
9/28/2018	Stachniak Kaplan, Kayla	Meet and confer with Government counsel regarding protective order; discuss case with team members; discuss case with N. Raol; prepare reply in support of summary judgment.	1.5	\$ 960	\$1,440.00
9/28/2018	Szlarb, Natalia	Call with a class member; conference with DOJ attorneys; draft an outline of factual section for a summary judgment; respond to Nio class members communications.	5.2	\$ 630	\$3,276.00
9/28/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, common interest counsel, and team members; emails to DOJ/USCIS; meet and confer re protective order language.	9.9	\$ 1,025	\$10,147.50
9/29/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.2	\$ 315	\$378.00
9/29/2018	Wollenberg, Jennifer	Address MAVNI issues and concerns, including emails with MAVNIs.	0.4	\$ 1,025	\$410.00
9/30/2018	Baruch, Douglas W.	DOJ correspondence and status.	1.0	\$ 1,350	\$1,350.00
9/30/2018	Kiziltay Carter, Melis	Search for materials in government's filings; draft argument.	4.9	\$ 730	\$3,577.00
9/30/2018	Raol, Neaha	Review correspondence re: various issues, from J. Wollenberg, H. Gogadze, M. Kiziltay; review articles re: deportation risk for MAVNIs.	0.7	\$ 960	\$672.00
9/30/2018	St. Romain, Kate	Email J. Wollenberg regarding defendants reporting; research composition of DOD enhanced background check and email J. LoBue and J. Wollenberg regarding the same.	0.6	\$ 785	\$471.00
9/30/2018	Szlarb, Natalia	Respond to Nio class members communications.	1.4	\$ 630	\$882.00
9/30/2018	Wollenberg, Jennifer	Address MAVNI issue/concerns/updates, including emails with MAVNIs, team members, common interest counsel, and team members; prepare filing for Nio/Calixto/Kirwa upcoming hearing.	13.4	\$ 1,025	\$13,735.00
10/1/2018	Baruch, Douglas W.	DOJ correspondence; hearing preparation; protective order issues.	1.5	\$ 1,350	\$2,025.00
10/1/2018	Kiziltay Carter, Melis	Research case law that about certain DDC rules.	1.4	\$ 730	\$1,022.00
10/1/2018	Raol, Neaha	Confer with class member re: status/questions.	0.2	\$ 960	\$192.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/1/2018	St. Romain, Kate	Read Defendants' status report; email J. LoBue regarding summary judgment; research Section 1440 and army regulations from prior papers and email J. LoBue and J. Wollenberg regarding the same; email common interest counsel.	0.9	\$ 785	\$706.50
10/1/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.5	\$ 630	\$1,575.00
10/1/2018	Wollenberg, Jennifer	Work on SJ materials; address MAVNI issues/updates/concerns, including discussions with MAVNIs.	3.7	\$ 1,025	\$3,792.50
10/2/2018	Baruch, Douglas W.	Correspondence with DOJ and prepare for hearing.	1.5	\$ 1,350	\$2,025.00
10/2/2018	Johnson, Sam	Attend conference with team members regarding managing communications with Nio class action members.	1.5	\$ 545	\$817.50
10/2/2018	Kiziltay Carter, Melis	Draft a section to be used in the summary judgment motion reply brief; research case law.	2.6	\$ 730	\$1,898.00
10/2/2018	LoPresti, Elizabeth	Conference with N. Szlarb regarding training for the MAVNI Nio inbox.	1.2	\$ 545	\$654.00
10/2/2018	McNamara, Brendan	Draft and finalize sections of summary judgment motion; email drafts to J. LoBue and J. Wollenberg.	3.5	\$ 315	\$1,102.50
10/2/2018	Raol, Neaha	Confer with class members; confer with K. Kaplan re: constitutional claims/SJM reply brief; review material re: Army Aug. 15 memo and confer with D. Baruch, J. Wollenberg re: same; review/revise filing in Nio, Kirwa, Calixto cases.	2.4	\$ 960	\$2,304.00
10/2/2018	St. Romain, Kate	Email team regarding plaintiff status; prepare hearing materials; draft proposed protective order.	4.0	\$ 785	\$3,140.00
10/2/2018	Stachniak Kaplan, Kayla	Legal research regarding constitutional claims in support of Nio summary judgment reply/opposition; discuss case with N. Raol.	1.5	\$ 960	\$1,440.00
10/2/2018	Szlarb, Natalia	Respond to Nio class members communications; meeting with associates to discuss the Nio mailbox.	4.0	\$ 630	\$2,520.00
10/2/2018	Wollenberg, Jennifer	Address issues/updates/problems for MAVNI soldiers, including discussions with MAVNIs, common interest counsel, and team members; prepare filing with proposed order; prepare for tomorrow's hearing.	5.7	\$ 1,025	\$5,842.50
10/3/2018	Baruch, Douglas W.	Status conference and preparation re same; strategy and summary judgment; client calls and DOJ correspondence; common interest call.	3.6	\$ 1,350	\$4,860.00
10/3/2018	Kiziltay Carter, Melis	Read filings for today's court hearing; attend court hearing.	5.1	\$ 730	\$3,723.00
10/3/2018	Raol, Neaha	Prep, attend and follow-up re: hearing - Nio, Kirwa, Calixto.	1.8	\$ 960	\$1,728.00
10/3/2018	St. Romain, Kate	Prepare documents for hearing; calls with J. Wollenberg regarding hearing preparation; attend hearing in MAVNI litigations; email plaintiff regarding PI motion; email M. Kiziltay Carter regarding MAVNI email response.	4.0	\$ 785	\$3,140.00
10/3/2018	Szlarb, Natalia	Respond to Nio class members communications; attend a hearing.	4.9	\$ 630	\$3,087.00
10/3/2018	Wollenberg, Jennifer	Prepare for and attend MAVNI hearing; address MAVNI issues/concerns/updates; team discussions.	5.1	\$ 1,025	\$5,227.50
10/4/2018	Baruch, Douglas W.	Call with plaintiff; address order; address summary judgment; draft proposed orders and review transcript.	4.5	\$ 1,350	\$6,075.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/4/2018	McNamara, Brendan	Review transcripts and orders for information related to administrative record; draft email to J. Wollenberg and N. Raol.	2.5	\$ 315	\$787.50
10/4/2018	Raol, Neaha	Confer with class members; confer with various team members including J. Wollenberg, M. Kiziltay re: draft proposed orders for Nio, Kirwa, Calixto; confer with J. Wollenberg, B. McNamara re: administrative record/motion to strike and underlying docs; review transcript; confer with D. Baruch, J. Wollenberg re: plaintiff and fact research re: same.	3.1	\$ 960	\$2,976.00
10/4/2018	St. Romain, Kate	Email and call J. Wollenberg regarding proposed orders; draft proposed orders; draft MAVNI litigation update to named plaintiffs; review MAVNI hearing transcript and email J. Wollenberg regarding the same.	1.8	\$ 785	\$1,413.00
10/4/2018	Szlarb, Natalia	Respond to Nio class members communications.	1.6	\$ 630	\$1,008.00
10/4/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members; work on proposed order requested by court; work on upcoming SJ filing.	7.1	\$ 1,025	\$7,277.50
10/5/2018	Baruch, Douglas W.	Address order and correspondence; address issues in related case filed by common interest counsel.	3.0	\$ 1,350	\$4,050.00
10/5/2018	Johnson, Sam	Review Nio Class Counsel inbox to prepare for managing communications with Nio class action members.	0.2	\$ 545	\$109.00
10/5/2018	Raol, Neaha	Confer with various class members re status/update from hearing; review/revise draft SJM opposition - constitutional law section;	3.6	\$ 960	\$3,456.00
10/5/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.4	\$ 630	\$1,512.00
10/5/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, common interest counsel, and team members; work on proposed order requested by court; work on upcoming SJ filing.	7.4	\$ 1,025	\$7,585.00
10/7/2018	Raol, Neaha	Draft/revise constitutional law section of SJM reply brief; email correspondence with D. Baruch re: same.	1.6	\$ 960	\$1,536.00
10/7/2018	Szlarb, Natalia	Respond to Nio class members communications.	4.3	\$ 630	\$2,709.00
10/7/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including emails to DOJ/USCIS re same.	4.4	\$ 1,025	\$4,510.00
10/8/2018	Baruch, Douglas W.	Address summary judgment briefing.	1.5	\$ 1,350	\$2,025.00
10/8/2018	Johnson, Sam	Review Nio Class Counsel inbox to prepare for managing communications with Nio class action members.	1.3	\$ 545	\$708.50
10/8/2018	Kiziltay Carter, Melis	Revise SJM footnote.	0.2	\$ 730	\$146.00
10/8/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.8	\$ 315	\$252.00
10/8/2018	Raol, Neaha	Confer with class members and follow-up correspondence as needed; review news/articles published re: case; review/incorporate D. Baruch edits to constitutional claims section of SJM reply.	4.5	\$ 960	\$4,320.00
10/8/2018	St. Romain, Kate	Respond to MAVNI soldier questions; email J. Wollenberg regarding telephone conferences with soldiers.	0.4	\$ 785	\$314.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/8/2018	Stachniak Kaplan, Kayla	Discuss summary judgment arguments with N. Raol.	0.4	\$ 960	\$384.00
10/8/2018	Szlarb, Natalia	Respond to Nio class members communications.	1.8	\$ 630	\$1,134.00
10/8/2018	Wollenberg, Jennifer	Calls/emails regarding MAVNI updates/issues/concerns.	2.3	\$ 1,025	\$2,357.50
10/9/2018	Baruch, Douglas W.	Edits and revisions to summary judgment reply drafts.	1.5	\$ 1,350	\$2,025.00
10/9/2018	Johnson, Sam	Review Nio Class Counsel inbox to prepare for managing communications with Nio class action members; prepare email message to N. Szlarb regarding managing communications with Nio class action members.	0.9	\$ 545	\$490.50
10/9/2018	Kiziltay Carter, Melis	Work on the sjm reply brief sections.	2.2	\$ 730	\$1,606.00
10/9/2018	Raol, Neaha	Confer with M. Kiziltay re: Nio SJM reply brief and record citations; review/incorporate D. Baruch edits to SJM reply constitutional section; confer with K. Kaplan re: same; confer with class members; confer with N. Szlarb, M. Kiziltay-Carter re: same.	3.7	\$ 960	\$3,552.00
10/9/2018	Stachniak Kaplan, Kayla	Revise constitutional arguments in summary judgment opposition/reply.	0.5	\$ 960	\$480.00
10/9/2018	Szlarb, Natalia	Respond to Nio class members communications.	4.3	\$ 630	\$2,709.00
10/9/2018	Williams, Ronald	Meet with N. Szlarb to discuss assignment regarding communicating with MAVNI class members; audit class counsel email inbox; identify and respond to unread email messages from MAVNI individuals.	3.7	\$ 545	\$2,016.50
10/9/2018	Wollenberg, Jennifer	Discussions re MAVNI issues/updates/concerns.	1.8	\$ 1,025	\$1,845.00
10/10/2018	Baruch, Douglas W.	Address summary judgment briefing.	1.5	\$ 1,350	\$2,025.00
10/10/2018	Baruch, Douglas W.	Address inquiries regarding status/updates/problems.	0.5	\$ 1,350	\$675.00
10/10/2018	Johnson, Sam	Attend conference with N. Szlarb regarding contacting Nio class members to inquire regarding their immigration status; prepare email messages to Nio class members to inquire regarding their immigration status.	1.0	\$ 545	\$545.00
10/10/2018	Kiziltay Carter, Melis	Work related to sjm reply brief.	0.3	\$ 730	\$219.00
10/10/2018	Raol, Neaha	Confer/correspondence with class members; review material provided my government/reports.	3.1	\$ 960	\$2,976.00
10/10/2018	St. Romain, Kate	Call and email plaintiff regarding MSSD and NSD status; email M. Kiziltay Carter regarding summary judgment motion.	0.3	\$ 785	\$235.50
10/10/2018	Williams, Ronald	Audit Nio Class Counsel inbox; respond to unanswered emails from MAVNI class members; forward emails to N. Szlarb for review.	3.9	\$ 545	\$2,125.50
10/10/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	0.8	\$ 1,025	\$820.00
10/11/2018	Baruch, Douglas W.	Addressing summary judgment sections on constitutionality and retroactivity; address DOJ filings.	3.5	\$ 1,350	\$4,725.00
10/11/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.4	\$ 315	\$126.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/11/2018	Raol, Neaha	Confer with/follow-up correspondence with class members; legal research re: constitutional section/uniform rule of naturalization cases for SJM reply; confer with D. Baruch re: same; email correspondence with K. Kaplan re: draft section for SJM reply; review K. Kaplan edits.	5.5	\$ 960	\$5,280.00
10/11/2018	Stachniak Kaplan, Kayla	Revise constitutional section of summary judgment opposition/reply; discuss case with J. Wollenberg.	4.0	\$ 960	\$3,840.00
10/11/2018	Szlarb, Natalia	Respond to Nio class members communications.	2.3	\$ 630	\$1,449.00
10/11/2018	Williams, Ronald	Respond to emails from MAVNI class members; conference with N. Szlarb regarding new government report and changing our approach to responding to class members' emails.	6.0	\$ 545	\$3,270.00
10/11/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including calls with MAVNIs and common interest counsel.	9.5	\$ 1,025	\$9,737.50
10/12/2018	Baruch, Douglas W.	Address summary judgment research and briefing.	3.0	\$ 1,350	\$4,050.00
10/12/2018	Johnson, Sam	Attend meeting with N. Szlarb regarding managing Nio Class Counsel inbox.	0.5	\$ 545	\$272.50
10/12/2018	Raol, Neaha	Confer with class members; confer with K. Kaplan re: constitutional claims/SJM reply brief and revise accordingly.	2.8	\$ 960	\$2,688.00
10/12/2018	Stachniak Kaplan, Kayla	Revise constitutional section of summary judgment opposition/reply; discuss case with N. Raol.	0.4	\$ 960	\$384.00
10/12/2018	Szlarb, Natalia	Respond to Nio class members communications; discuss potential responses with Ron Williams and Sam Johnson.	3.3	\$ 630	\$2,079.00
10/12/2018	Williams, Ronald	Respond to MAVNI class members' emails; forward emails to N. Szlarb for review.	2.1	\$ 545	\$1,144.50
10/12/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.9	\$ 1,025	\$5,022.50
10/13/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; work on SJ reply brief.	12.5	\$ 1,025	\$12,812.50
10/14/2018	Baruch, Douglas W.	Summary judgment motion briefing.	1.0	\$ 1,350	\$1,350.00
10/14/2018	Johnson, Sam	Prepare draft email messages to Nio class members informing and advising them regarding their immigration status.	1.4	\$ 545	\$763.00
10/14/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; work on SJ reply brief.	13.9	\$ 1,025	\$14,247.50
10/15/2018	Baruch, Douglas W.	Address summary judgment reply and DOJ correspondence; team meeting; address protective order.	4.2	\$ 1,350	\$5,670.00
10/15/2018	Johnson, Sam	Prepare email messages to Nio class members informing and advising them regarding their immigration status; prepare email messages to Nio class members to inquire regarding their immigration status; attend conference with N. Szlarb and R. Williams regarding identifying corrections for the government's draft report; prepare updated draft email regarding corrections to government's draft report; prepare email messages to R. Williams regarding updating draft email; prepare email message to N. Szlarb regarding updating draft email.	5.9	\$ 545	\$3,215.50
10/15/2018	Kiziltay Carter, Melis	Work related to response brief to summary judgment motion.	6.7	\$ 730	\$4,891.00
10/15/2018	McNamara, Brendan	Team meeting; respond to soldiers' emails regarding naturalization.	6.4	\$ 315	\$2,016.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/15/2018	Raol, Neaha	Confer with class members; team meeting re: status, strategy, and next steps; review news/articles re: MAVNIs/Army; review chronology/respond with H. Gogadze re: same/motion to strike.	3.4	\$ 960	\$3,264.00
10/15/2018	St. Romain, Kate	Email common interest counsel regarding filings; attend team meeting regarding Nio reporting; email B. Stuart and P. Weldon regarding Nio reporting problems; meet and email L. Woods and B. Stuart regarding Nio reporting analysis; respond to MAVNI soldier emails; draft Nio summary judgment section regarding injuries; email B. Stuart regarding documents for MAVNI litigation website.	3.1	\$ 785	\$2,433.50
10/15/2018	Stuart, Brian C.	Conference with D. Baruch, J. Wollenberg, et al.; Legal research for MSJ; Compare Sept. and Oct. Government reports.	2.8	\$ 730	\$2,044.00
10/15/2018	Szlarb, Natalia	Respond to Nio class members communications; attend team meeting.	4.1	\$ 630	\$2,583.00
10/15/2018	Williams, Ronald	Respond to emails from MAVNI class members; conference with N. Szlarb and S. Johnson about sending an updated email to Defendants' concerning edits to the most recent government report; update previous Nio Class Counsel email based on the new government report.	3.5	\$ 545	\$1,907.50
10/15/2018	Wollenberg, Jennifer	Work on SJ reply and motion to strike; address issues with Nio reporting; address MAVNI issues/concerns/updates, including discussions with MAVNI soldiers.	9.5	\$ 1,025	\$9,737.50
10/15/2018	Woods, Elizabeth	Conference with matter team regarding government reporting; prepare comparison spreadsheets analyzing government reporting.	5.3	\$ 630	\$3,339.00
10/16/2018	Baruch, Douglas W.	Motion to strike and PSJ reply brief; correspond with DOJ.	6.5	\$ 1,350	\$8,775.00
10/16/2018	Johnson, Sam	Prepare email messages to Nio class members to inquire regarding their immigration status.	4.5	\$ 545	\$2,452.50
10/16/2018	Kiziltay Carter, Melis	Meet with B. Stuart to discuss summary judgment motion.	0.9	\$ 730	\$657.00
10/16/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	3.6	\$ 315	\$1,134.00
10/16/2018	Raol, Neaha	Confer with class members; team meeting re: status, strategy, and next steps; review news/articles re: MAVNIs/Army.	4.1	\$ 960	\$3,936.00
10/16/2018	St. Romain, Kate	Meet with and email B. Stuart regarding reporting problems; call and email N. Szlarb and L. Woods regarding reporting problems; update MAVNI litigation website; email J. Wollenberg regarding MAVNI litigation updates.	1.4	\$ 785	\$1,099.00
10/16/2018	Stuart, Brian C.	Legal research for MSJ; Compare Sept. and Oct. Government reports; Review Motion to Strike.	6.8	\$ 730	\$4,964.00
10/16/2018	Szlarb, Natalia	Respond to Nio class members communications; draft a response email to DOJ regarding the October report; conference with Sam Johnson and Ronald Williams.	5.8	\$ 630	\$3,654.00
10/16/2018	Williams, Ronald	Respond to emails from MAVNI class members; update an email to the Defendant based on most recent government report.	2.9	\$ 545	\$1,580.50
10/16/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs; prep SJ filing and motion to strike; review government report for issues.	10.8	\$ 1,025	\$11,070.00
10/17/2018	Baruch, Douglas W.	Drafting and revising PSJ brief and motion to strike.	3.5	\$ 1,350	\$4,725.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/17/2018	Johnson, Sam	Attend conference with N. Szlarb and R. Williams regarding identifying corrections for the government's draft report; prepare updated draft email regarding corrections to government's draft report; prepare email messages to R. Williams regarding updating draft email; prepare email message to N. Szlarb regarding updating draft email.	3.2	\$ 545	\$1,744.00
10/17/2018	Kiziltay Carter, Melis	Work on summary judgment motion reply brief.	3.8	\$ 730	\$2,774.00
10/17/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.2	\$ 315	\$378.00
10/17/2018	Raol, Neaha	Confer with M. Kiziltay-Carter re: SJM reply research; review draft email to DOJ re: October report issues; correspondence with MAVNI class members; correspondence with H. Gogadze, B. McNamara re motion to strike/docket entries.	0.5	\$ 960	\$480.00
10/17/2018	St. Romain, Kate	Meet with and call B. Stuart regarding government reporting analysis; prepare analysis of government reporting data; email N. Szlarb regarding government reporting issues; email N. Raol regarding MAVNI litigation website; email and call L. Woods regarding MAVNI reporting analysis.	1.3	\$ 785	\$1,020.50
10/17/2018	Stuart, Brian C.	Legal research for MSJ; Compare Sept. and Oct. Government reports; Review Motion to Strike.	12.2	\$ 730	\$8,906.00
10/17/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ.	10.6	\$ 630	\$6,678.00
10/17/2018	Williams, Ronald	Attend MAVNI hearing at U.S. District Court; update email to send to Defendants.	8.7	\$ 545	\$4,741.50
10/17/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prep SJ filing and motion to strike.	6.2	\$ 1,025	\$6,355.00
10/17/2018	Woods, Elizabeth	Prepare comparison spreadsheets analyzing government reporting.	3.4	\$ 630	\$2,142.00
10/18/2018	Baruch, Douglas W.	Drafting PSJ reply brief and motion to strike; DOJ correspondence.	9.5	\$ 1,350	\$12,825.00
10/18/2018	Hinnant, H. Coleman	Proofread and cite check Nio motion to strike (J. Wollenberg).	3.0	\$ 275	\$825.00
10/18/2018	Johnson, Sam	Prepare email messages to Nio class members to inquire regarding their immigration status.	0.8	\$ 545	\$436.00
10/18/2018	Kiziltay Carter, Melis	Work on summary judgment motion reply brief.	3.3	\$ 730	\$2,409.00
10/18/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.8	\$ 315	\$882.00
10/18/2018	Raol, Neaha	Correspondence with team re: SJM briefing; confer/correspond with various class members; confer with J. Wollenberg re: status of SJM opposition/reply brief and motion to strike; review/revise motion to strike brief; correspondence with K. Kaplan, K. St. Romaine, others re: same.	2.5	\$ 960	\$2,400.00
10/18/2018	St. Romain, Kate	Email N. Raol regarding summary judgment motion; email N. Szlarb regarding Nio reporting issues; edit motion to strike; email K. Kaplan and J. Wollenberg regarding motion to strike.	0.8	\$ 785	\$628.00
10/18/2018	Stachniak Kaplan, Kayla	Revise Motion to Strike.	1.4	\$ 960	\$1,344.00
10/18/2018	Stuart, Brian C.	Legal research for MSJ; Review Motion to Strike; Draft proposed order for Motion to Strike.	7.8	\$ 730	\$5,694.00
10/18/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prep SJ filing and motion to strike.	16.5	\$ 1,025	\$16,912.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/18/2018	Woods, Elizabeth	Review case law regarding government denial of individual benefits; review and prepare sections of plaintiffs' summary judgment opposition and reply.	3.3	\$ 630	\$2,079.00
10/19/2018	Baruch, Douglas W.	Final edits and revisions to PSJ reply brief and motion to strike.	8.5	\$ 1,350	\$11,475.00
10/19/2018	Hinnant, H. Coleman	Cite check Nio motion for partial summary judgment (J. Wollenberg).	7.5	\$ 275	\$2,062.50
10/19/2018	Johnson, Sam	Prepare email messages to Nio class members to inquire regarding their immigration status.	0.8	\$ 545	\$436.00
10/19/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	3.1	\$ 315	\$976.50
10/19/2018	Raol, Neaha	Review/revise draft SJM opposition/reply brief; confer with various team members re: same; incorporate comments/edits; revise motion to strike papers and confer with team members re: same; finalize all papers to be filed in support of SJM and motion to strike.	11.8	\$ 960	\$11,328.00
10/19/2018	St. Romain, Kate	Edit motion to strike; call and email J. Wollenberg regarding motion to strike; email and call M. Kiziltay Carter and B. Stuart regarding motion to strike; edits to motion.	2.2	\$ 785	\$1,727.00
10/19/2018	Stachniak Kaplan, Kayla	Revise summary judgment opposition/reply.	2.4	\$ 960	\$2,304.00
10/19/2018	Stuart, Brian C.	Review MSJ; Review Motion to Strike.	11.4	\$ 730	\$8,322.00
10/19/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prep SJ filing and motion to strike.	17.2	\$ 1,025	\$17,630.00
10/19/2018	Woods, Elizabeth	Review and prepare sections of plaintiffs' summary judgment opposition and reply.	5.4	\$ 630	\$3,402.00
10/20/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.8	\$ 315	\$252.00
10/21/2018	Baruch, Douglas W.	Address client correspondence; call with plaintiff.	1.2	\$ 1,350	\$1,620.00
10/22/2018	Baruch, Douglas W.	Address summary judgment; team meeting; call with counsel re plaintiff; review filings in similar matter.	3.8	\$ 1,350	\$5,130.00
10/22/2018	Johnson, Sam	Prepare email messages to Nio class members to inquire regarding their immigration status.	3.8	\$ 545	\$2,071.00
10/22/2018	Kiziltay Carter, Melis	Team meeting.	0.9	\$ 730	\$657.00
10/22/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	3.3	\$ 315	\$1,039.50
10/22/2018	Raol, Neaha	Team meeting re: status, next steps; confer with D. Baruch, J. Wollenberg; confer with various class members; email correspondence with common interest counsel; draft email to DOJ re: specific class members; confer with K. St. Romain re: responses.	5.1	\$ 960	\$4,896.00
10/22/2018	St. Romain, Kate	Call with N. Raol regarding summary judgment filing; attend team meeting regarding outstanding tasks; email N. Szlarb, D. Baruch and N. Raol regarding responses to MAVNI emails; email J. Wollenberg regarding MAVNI litigation website.	0.6	\$ 785	\$471.00
10/22/2018	Stachniak Kaplan, Kayla	Discuss case with team members.	0.5	\$ 960	\$480.00
10/22/2018	Stuart, Brian C.	Conference with D. Baruch, J. Wollenberg, et al.	0.5	\$ 730	\$365.00
10/22/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members.	4.0	\$ 630	\$2,520.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/22/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and others.	7.8	\$ 1,025	\$7,995.00
10/22/2018	Woods, Elizabeth	Conference with matter team regarding task assignments for future filings.	1.0	\$ 630	\$630.00
10/23/2018	Baruch, Douglas W.	DOJ correspondence and strategy.	1.2	\$ 1,350	\$1,620.00
10/23/2018	Johnson, Sam	Prepare email messages to Nio class members to inquire regarding their immigration status.	4.3	\$ 545	\$2,343.50
10/23/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.1	\$ 315	\$346.50
10/23/2018	Raol, Neaha	Email correspondence/conference with class members.	1.0	\$ 960	\$960.00
10/23/2018	St. Romain, Kate	Call with J. Wollenberg regarding MAVNI litigation website; supplement MAVNI litigation website; email B. Stuart regarding filing deadlines.	0.2	\$ 785	\$157.00
10/23/2018	Stuart, Brian C.	Research subclass certification.	5.0	\$ 730	\$3,650.00
10/23/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members.	3.4	\$ 630	\$2,142.00
10/23/2018	Williams, Ronald	Conference with team members re MAVNI issues and scheduling calls re same.	0.9	\$ 545	\$490.50
10/23/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and others.	7.2	\$ 1,025	\$7,380.00
10/24/2018	Baruch, Douglas W.	Address DOJ filing; call with plaintiff; address DOJ reports; correspondence with DOJ.	5.5	\$ 1,350	\$7,425.00
10/24/2018	Johnson, Sam	Prepare email messages to Nio class members to inquire regarding their immigration status.	4.0	\$ 545	\$2,180.00
10/24/2018	McNamara, Brendan	Attend team meeting; respond to soldiers' emails regarding naturalization.	4.4	\$ 315	\$1,386.00
10/24/2018	Raol, Neaha	Confer/correspondence with various class members; follow-up emails with K. Grisez; review DOJ status report filed with court; correspondence re: issues with DOJ draft report; review Sept. 2018 email/memo re: clearance; correspondence with common interest counsel re: timing out MAVNIs; review DOJ opposition to motion to strike.	2.5	\$ 960	\$2,400.00
10/24/2018	St. Romain, Kate	Supplement MAVNI litigation website; email named plaintiffs regarding motion partial summary judgment, bi-weekly status report and motion to strike; email L. Woods regarding reporting analysis.	0.6	\$ 785	\$471.00
10/24/2018	Stuart, Brian C.	Research subclass certification.	3.2	\$ 730	\$2,336.00
10/24/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with MAVNIs; compare government reports; meeting with Jennifer Wollenberg and Brendan McNamara.	3.7	\$ 630	\$2,331.00
10/24/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and others.	7.3	\$ 1,025	\$7,482.50
10/25/2018	Baruch, Douglas W.	Draft reply brief in support of Motion to Strike; address plaintiff's issues.	5.5	\$ 1,350	\$7,425.00
10/25/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	3.8	\$ 545	\$2,071.00
10/25/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.4	\$ 315	\$441.00
10/25/2018	Raol, Neaha	Review DOJ updated report filed re: class members/status.	0.5	\$ 960	\$480.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/25/2018	St. Romain, Kate	Review MAVNI responses and email Nio inbox team regarding the same; meet with J. Wollenberg regarding MAVNI litigation website.	0.5	\$ 785	\$392.50
10/25/2018	Stuart, Brian C.	Research subclass certification.	4.6	\$ 730	\$3,358.00
10/25/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and others.	7.0	\$ 1,025	\$7,175.00
10/25/2018	Woods, Elizabeth	Prepare spreadsheets comparing government's reporting.	3.0	\$ 630	\$1,890.00
10/26/2018	Baruch, Douglas W.	Address motion to strike reply and DOJ filings; client calls.	3.5	\$ 1,350	\$4,725.00
10/26/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	4.2	\$ 545	\$2,289.00
10/26/2018	LoPresti, Elizabeth	Conference with J. Wollenberg and class member for preliminary interview; correspondence with class members.	2.0	\$ 545	\$1,090.00
10/26/2018	Raol, Neaha	Confer with various class members.	0.7	\$ 960	\$672.00
10/26/2018	St. Romain, Kate	Email regarding and call with MAVNI soldier; email E. LoPresti regarding MAVNI litigation materials.	0.3	\$ 785	\$235.50
10/26/2018	Stuart, Brian C.	Research subclass certification.	6.1	\$ 730	\$4,453.00
10/26/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with MAVNIs; compare government reports.	2.6	\$ 630	\$1,638.00
10/26/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and others.	7.2	\$ 1,025	\$7,380.00
10/27/2018	Wollenberg, Jennifer	Address Strike reply.	0.9	\$ 1,025	\$922.50
10/28/2018	Baruch, Douglas W.	Address reply brief and status.	1.5	\$ 1,350	\$2,025.00
10/28/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.1	\$ 545	\$599.50
10/28/2018	McNamara, Brendan	Review and send common interest counsel updates of soldiers from final October report.	0.6	\$ 315	\$189.00
10/28/2018	Wollenberg, Jennifer	Address Strike reply.	0.8	\$ 1,025	\$820.00
10/29/2018	Baruch, Douglas W.	Edits, revisions, finalize motion to strike reply; call with client re status; confer with J. Wollenberg re status and strategy.	4.5	\$ 1,350	\$6,075.00
10/29/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	3.5	\$ 545	\$1,907.50
10/29/2018	LoPresti, Elizabeth	Conference with J. Wollenberg and class client regarding preliminary interview; correspondence with class members regarding call follow-up.	2.8	\$ 545	\$1,526.00
10/29/2018	Raol, Neaha	Review/revise draft reply to motion to strike; confer with J. Wollenberg, J. DeSantis re: same; confer with class members re: status.	1.9	\$ 960	\$1,824.00
10/29/2018	St. Romain, Kate	Edit motion to strike memorandum; call and email J. Wollenberg regarding motion to strike memorandum.	1.6	\$ 785	\$1,256.00
10/29/2018	Stuart, Brian C.	Review Reply in Support of Motion to Strike.	1.1	\$ 730	\$803.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
10/29/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with MAVNI soldiers; compare government reports.	3.6	\$ 630	\$2,268.00
10/29/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; finalize and file motion to strike reply.	9.8	\$ 1,025	\$10,045.00
10/30/2018	Baruch, Douglas W.	Review and address Defendants' report and correspondence with DOJ; address filings in similar matter; review FOIA response documents.	5.8	\$ 1,350	\$7,830.00
10/30/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	2.5	\$ 545	\$1,362.50
10/30/2018	Kiziltay Carter, Melis	Review our brief in support of the motion to strike.	0.7	\$ 730	\$511.00
10/30/2018	Raol, Neaha	Review status report; contact class member shipping to BCT; confer with J. Wollenberg re: same.	0.3	\$ 960	\$288.00
10/30/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with soldiers; compare government reports.	2.9	\$ 630	\$1,827.00
10/30/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	8.2	\$ 1,025	\$8,405.00
10/31/2018	Baruch, Douglas W.	Address report and filings in similar case.	3.5	\$ 1,350	\$4,725.00
10/31/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	2.4	\$ 545	\$1,308.00
10/31/2018	LoPresti, Elizabeth	Review client paperwork.	1.5	\$ 545	\$817.50
10/31/2018	St. Romain, Kate	Call with MAVNI soldier; email Nio Class Counsel inbox regarding response to MAVNI soldier.	0.2	\$ 785	\$157.00
10/31/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with MAVNIs; compare government reports; conference with Jennifer Wollenberg.	4.2	\$ 630	\$2,646.00
10/31/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	9.2	\$ 1,025	\$9,430.00
11/1/2018	Baruch, Douglas W.	Address similar case filings and confer with counsel re same; address DOJ correspondence.	2.5	\$ 1,350	\$3,375.00
11/1/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare for meeting with class member regarding her situation.	2.5	\$ 545	\$1,362.50
11/1/2018	LoPresti, Elizabeth	Review documents sent by clients.	3.1	\$ 545	\$1,689.50
11/1/2018	Raol, Neaha	Confer with individual class members; follow-up with J. Wollenberg re: same.	1.3	\$ 960	\$1,248.00
11/1/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with MAVNIs with issues; compare government reports; conference with Jennifer Wollenberg.	2.7	\$ 630	\$1,701.00
11/1/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with team members, MAVNIs, and others.	5.6	\$ 1,025	\$5,740.00
11/2/2018	Baruch, Douglas W.	Address DOJ correspondence.	1.0	\$ 1,350	\$1,350.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/2/2018	Johnson, Sam	Attend conference with class member and team members regarding updates in MAVNI litigation and to provide information in response to questions; prepare email messages to Nio class members responding to class member questions; legal research regarding options to correct or amend erroneous information contained in Government reports.	3.9	\$ 545	\$2,125.50
11/2/2018	LoPresti, Elizabeth	Review documents sent by clients.	1.4	\$ 545	\$763.00
11/2/2018	Raol, Neaha	Confer/email correspondence with individual class members; confer with various team members and class member in office.	3.6	\$ 960	\$3,456.00
11/2/2018	Szlarb, Natalia	Respond to Nio class members communications; prepare response email to DOJ; review emails to class members; schedule calls with MAVNIs.	2.0	\$ 630	\$1,260.00
11/2/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs, team members, and others.	6.2	\$ 1,025	\$6,355.00
11/3/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.9	\$ 545	\$490.50
11/4/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding questions about responding to Nio class member inquiries.	1.9	\$ 545	\$1,035.50
11/4/2018	LoPresti, Elizabeth	Correspondence with S. Johnson regarding client status; correspondence with client regarding documents.	0.3	\$ 545	\$163.50
11/4/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including reviewing emails from MAVNIs; review brief in other MAVNI case; common interest communications.	6.0	\$ 1,025	\$6,150.00
11/5/2018	Baruch, Douglas W.	Address similar case and DOJ correspondence.	1.2	\$ 1,350	\$1,620.00
11/5/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; legal research regarding options to correct or amend erroneous information contained in Government reports.	3.1	\$ 545	\$1,689.50
11/5/2018	Raol, Neaha	Confer/correspondence with various team members; call with various class members re: status; review government reports re: same.	4.7	\$ 960	\$4,512.00
11/5/2018	St. Romain, Kate	Email N. Szlarb and N. Raol regarding MAVNI email responses and organization; email and call B. McNamara regarding MAVNI emails; email J. Wollenberg regarding calls with MAVNI soldiers; email J. Wollenberg, D. Baruch and N. Raol regarding supplements to MAVNI litigation website.	0.7	\$ 785	\$549.50
11/5/2018	Szlarb, Natalia	Respond to Nio class members communications; team meeting; conference call.	3.1	\$ 630	\$1,953.00
11/6/2018	Baruch, Douglas W.	Address summary judgment and motion to strike; review pleadings in similar case.	3.5	\$ 1,350	\$4,725.00
11/6/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding certain class members; prepare email messages to K. St. Romain regarding answering class member inquiries.	6.1	\$ 545	\$3,324.50
11/6/2018	McNamara, Brendan	Review emails from J. Wollenberg and respond to soldiers identified in chart.	6.6	\$ 315	\$2,079.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/6/2018	Raol, Neaha	Confer with class members; follow-up/confer with B. McNamara, others re: same; court correspondence re: motion to strike.	4.1	\$ 960	\$3,936.00
11/6/2018	St. Romain, Kate	Call and email named plaintiff regarding ship date; email J. Wollenberg regarding named plaintiff ship date.	0.2	\$ 785	\$157.00
11/6/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates, including discussions with MAVNIs and others.	5.6	\$ 1,025	\$5,740.00
11/7/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding certain class members.	2.1	\$ 545	\$1,144.50
11/7/2018	McNamara, Brendan	Participate in phone call with potential plaintiff; respond to soldiers' emails re naturalization.	4.6	\$ 315	\$1,449.00
11/7/2018	Raol, Neaha	Confer/correspondence with various class members re: status, discharge, updates, next steps; confer with various team members re: same; conference with court re: motion to strike; conferences with D. Baruch, J. Wollenberg, J. LoBue, H. Gogadze re: same/next steps; review wDOJ report on named plaintiffs.	6.7	\$ 960	\$6,432.00
11/7/2018	Szlarb, Natalia	Respond to Nio class members communications; conference call with a MAVNI.	2.6	\$ 630	\$1,638.00
11/7/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; conference in Nio re Motion to Strike.	6.2	\$ 1,025	\$6,355.00
11/8/2018	Baruch, Douglas W.	Address summary judgment opposition; conference call with Court re Motion to Strike; DOJ correspondence.	3.2	\$ 1,350	\$4,320.00
11/8/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding certain class members; prepare email messages to K. St. Romain regarding preparing email messages to class member.	3.1	\$ 545	\$1,689.50
11/8/2018	LoPresti, Elizabeth	Conference with J. Wollenberg and client; prepare for client conference.	1.5	\$ 545	\$817.50
11/8/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.7	\$ 315	\$535.50
11/8/2018	Raol, Neaha	Identify and prepare appendix, administrative record - electronic versions; factual research/litigation history re: same; confer with D. Baruch, J. Wollenberg re: same; review court order and follow-up internal correspondence.	5.9	\$ 960	\$5,664.00
11/8/2018	St. Romain, Kate	Email J. Wollenberg regarding MAVNI phone calls; email regarding MAVNI responses; research and coordinate research regarding MAVNI business associates; email S. Johnson regarding email to MAVNI regarding business associations.	0.6	\$ 785	\$471.00
11/8/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; courtesy copies re AR and PA.	5.7	\$ 1,025	\$5,842.50
11/9/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	2.1	\$ 545	\$1,144.50
11/9/2018	LoPresti, Elizabeth	Correspondence with E. Woods regarding client communication; review newly received client documents.	1.6	\$ 545	\$872.00
11/9/2018	McNamara, Brendan	Participate in phone call with MAVNI soldier; respond to soldiers' emails regarding naturalization.	1.6	\$ 315	\$504.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/9/2018	Raol, Neaha	Prepare and finalize notice of filing, administrative record, plaintiffs' appendix (hard copy and electronic versions/FTP site for court, opposing counsel); conferences with D. Baruch, J. Wollenberg re: same; revise/update; confer with class member re: status/next steps; review class cert motion for update.	6.1	\$ 960	\$5,856.00
11/9/2018	St. Romain, Kate	Update deadline, reporting, and scheduling reminders; email J. Wollenberg regarding calls with MAVNI soldiers; draft email to government regarding named plaintiff naturalization and email J. Wollenberg regarding the same.	0.5	\$ 785	\$392.50
11/9/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; filing and courtesy copies re AR and PA.	7.2	\$ 1,025	\$7,380.00
11/10/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	2.9	\$ 545	\$1,580.50
11/10/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.2	\$ 315	\$63.00
11/11/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.4	\$ 545	\$218.00
11/12/2018	Baruch, Douglas W.	Address DOJ correspondence and summary judgment.	1.5	\$ 1,350	\$2,025.00
11/12/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconference with B. McNamara regarding responding to certain class members.	7.4	\$ 545	\$4,033.00
11/12/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00
11/12/2018	Raol, Neaha	Confer with class members re: status / next steps.	1.4	\$ 960	\$1,344.00
11/12/2018	Szlarb, Natalia	Respond to Nio class members communications; conference call.	1.1	\$ 630	\$693.00
11/12/2018	Wollenberg, Jennifer	Address MAVNI concerns/updates/issues.	3.4	\$ 1,025	\$3,485.00
11/13/2018	Baruch, Douglas W.	Research re summary judgment and DOJ correspondence.	1.4	\$ 1,350	\$1,890.00
11/13/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding responding to class member questions; prepare email messages to B. McNamara regarding responding to class member questions.	7.8	\$ 545	\$4,251.00
11/13/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.9	\$ 315	\$283.50
11/13/2018	Raol, Neaha	Confer with / correspondence with various class members.	1.8	\$ 960	\$1,728.00
11/13/2018	St. Romain, Kate	Call with J. Wollenberg regarding MAVNI email response and status conference.	0.2	\$ 785	\$157.00
11/13/2018	Wollenberg, Jennifer	Address MAVNI issues/updates concerns; prepare for tomorrow's hearing.	4.9	\$ 1,025	\$5,022.50
11/14/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding responding to class member questions; prepare email messages to B. McNamara regarding responding to class member questions.	7.3	\$ 545	\$3,978.50
11/14/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.8	\$ 315	\$252.00
11/14/2018	Raol, Neaha	Follow-up re: notices; confer with class member re: notice / discharge etc.	0.5	\$ 960	\$480.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/14/2018	Raol, Neaha	Prep for hearing; confer/correspondence with class members; confer with D. Baruch, J. Wollenberg, J. LoBue re: status/next steps; correspondence with common interest counsel, others re: USCIS hold / factual background.	3.5	\$ 960	\$3,360.00
11/14/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; prepare for and attend hearing; hearing follow-up.	6.0	\$ 1,025	\$6,150.00
11/15/2018	Baruch, Douglas W.	Team meeting and hearing follow-up.	1.5	\$ 1,350	\$2,025.00
11/15/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding responding to class member questions; prepare email messages to B. McNamara regarding responding to class member questions.	5.4	\$ 545	\$2,943.00
11/15/2018	LoPresti, Elizabeth	Attend MAVNI meeting regarding the status of the cases after the Wednesday court hearing; conduct legal research regarding extra-administrative record evidence in APA cases.	5.3	\$ 545	\$2,888.50
11/15/2018	McNamara, Brendan	Attend team meeting; respond to soldiers' emails regarding naturalization.	1.2	\$ 315	\$378.00
11/15/2018	Raol, Neaha	Internal conference re: references; team meeting re: next steps, update; confer with class members; review court order.	2.4	\$ 960	\$2,304.00
11/15/2018	St. Romain, Kate	Call with J. Wollenberg regarding status conference; attend MAVNI team meeting regarding status conference update; supplement MAVNI litigation website; email team regarding Camp research.	1.6	\$ 785	\$1,256.00
11/15/2018	Szlarb, Natalia	Respond to Nio class members communications; team meeting; conference call.	2.6	\$ 630	\$1,638.00
11/15/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates; hearing follow-up.	5.1	\$ 1,025	\$5,227.50
11/16/2018	Baruch, Douglas W.	Address summary judgment and DOJ correspondence; call with common interest counsel.	3.0	\$ 1,350	\$4,050.00
11/16/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to B. McNamara regarding responding to class member questions.	2.5	\$ 545	\$1,362.50
11/16/2018	LoPresti, Elizabeth	Conduct legal research regarding Judge Huvelle's prior opinions involving the use of extra-administrative record evidence in APA cases.	2.0	\$ 545	\$1,090.00
11/16/2018	Raol, Neaha	Confer / correspondence with class members.	0.6	\$ 960	\$576.00
11/16/2018	Szlarb, Natalia	Respond to Nio class members communications; team meeting; conference call.	1.9	\$ 630	\$1,197.00
11/16/2018	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.2	\$ 1,025	\$4,305.00
11/17/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.7	\$ 545	\$381.50
11/18/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 545	\$109.00
11/19/2018	Baruch, Douglas W.	Address summary judgment and decision in similar case; DOJ correspondence; confer with J. Wollenberg.	3.5	\$ 1,350	\$4,725.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
11/19/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding responding to class member questions and legal research concerning related cases.	3.2	\$ 545	\$1,744.00
11/19/2018	Raol, Neaha	Confer/correspondence with various class members; internal correspondence re: same and next steps/strategy; confer with K. St. Romain, others re: correspondence with class members/status.	2.7	\$ 960	\$2,592.00
11/19/2018	Stachniak Kaplan, Kayla	Discuss case with D. Baruch.	0.2	\$ 960	\$192.00
11/19/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including calls with MAVNIs.	5.5	\$ 1,025	\$5,637.50
11/20/2018	Baruch, Douglas W.	Address summary judgment.	3.5	\$ 1,350	\$4,725.00
11/20/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situation; prepare email messages to K. Grisez regarding class member situation; prepare email messages to common interest counsel regarding class member situation.	3.6	\$ 545	\$1,962.00
11/20/2018	LoPresti, Elizabeth	Legal research regarding Judge Huvelle's cases involving extra-administrative record issues; correspondence with D. Baruch regarding Judge Huvelle research.	6.2	\$ 545	\$3,379.00
11/20/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including calls with MAVNIs.	4.3	\$ 1,025	\$4,407.50
11/21/2018	Baruch, Douglas W.	DOJ correspondence and research re summary judgment.	1.5	\$ 1,350	\$2,025.00
11/21/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to K. Grisez regarding class member situation.	3.8	\$ 545	\$2,071.00
11/21/2018	Raol, Neaha	Review DOJ filing; confer with class member.	0.6	\$ 960	\$576.00
11/21/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including calls with MAVNIs.	5.2	\$ 1,025	\$5,330.00
11/22/2018	Wollenberg, Jennifer	Address MAVNI updates/issues/concerns.	2.3	\$ 1,025	\$2,357.50
11/24/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situation; prepare email message to B. McNamara regarding class member situation.	2.0	\$ 545	\$1,090.00
11/25/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to B. McNamara regarding class member situation.	0.3	\$ 545	\$163.50
11/26/2018	Baruch, Douglas W.	Address summary judgment and DOJ correspondence.	1.5	\$ 1,350	\$2,025.00
11/26/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	7.3	\$ 545	\$3,978.50
11/26/2018	Raol, Neaha	Review class member correspondence/voicemails; internal correspondence re: same.	0.8	\$ 960	\$768.00
11/26/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including communications with MAVNIs and others.	4.2	\$ 1,025	\$4,305.00
11/27/2018	Baruch, Douglas W.	Multiple emails to DOJ; confer with J. Wollenberg; research.	1.5	\$ 1,350	\$2,025.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/27/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class members' situations; prepare email messages to B. McNamara regarding class members' situations.	6.9	\$ 545	\$3,760.50
11/27/2018	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.5	\$ 315	\$157.50
11/27/2018	Raol, Neaha	Review class member correspondence; respond/identify follow-up as applicable.	2.0	\$ 960	\$1,920.00
11/27/2018	Wollenberg, Jennifer	Address updates, issues, concerns re MAVNIs, including discussions with MAVNIs and others.	5.7	\$ 1,025	\$5,842.50
11/28/2018	Baruch, Douglas W.	Address summary judgment research.	2.5	\$ 1,350	\$3,375.00
11/28/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class members' situations; review transcript of November 14, 2018 hearing.	7.1	\$ 545	\$3,869.50
11/28/2018	Raol, Neaha	Review draft report from DOJ.	1.2	\$ 960	\$1,152.00
11/28/2018	St. Romain, Kate	Call with MAVNI soldier; coordinate telephone conference with named plaintiffs; email J. Wollenberg regarding call with MAVNI soldier.	0.3	\$ 785	\$235.50
11/28/2018	Szlarb, Natalia	Respond to Nio class members communications; review hearing transcript.	1.4	\$ 630	\$882.00
11/28/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	6.2	\$ 1,025	\$6,355.00
11/29/2018	Baruch, Douglas W.	Address summary judgment and status.	2.5	\$ 1,350	\$3,375.00
11/29/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class members' situation; prepare email messages to B. McNamara regarding class members' situations; attend teleconference with J. Wollenberg regarding class members' situations and preparing draft corrections email for DOJ/USCIS' preliminary December report; prepare email messages to B. McNamara regarding preparing draft corrections email.	9.6	\$ 545	\$5,232.00
11/29/2018	Raol, Neaha	Correspondence/confer with class members; follow-up re: same.	1.4	\$ 960	\$1,344.00
11/29/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.5	\$ 1,025	\$4,612.50
11/30/2018	Baruch, Douglas W.	Client calls; DOJ correspondence; address summary judgment.	3.0	\$ 1,350	\$4,050.00
11/30/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class members' situation; prepare email messages to B. McNamara regarding class members' situations; attend teleconference with J. Wollenberg regarding scheduling call with class member; prepare email messages to B. McNamara regarding preparing draft corrections email for DOJ/USCIS' preliminary December report.	9.9	\$ 545	\$5,395.50
11/30/2018	McNamara, Brendan	Review and respond to soldiers' emails regarding naturalization.	2.0	\$ 315	\$630.00
11/30/2018	Raol, Neaha	Confer with class members.	1.1	\$ 960	\$1,056.00
11/30/2018	St. Romain, Kate	Email B. McNamara regarding MAVNI report; attend telephone conference with J. Wollenberg, D. Baruch and named plaintiff.	0.9	\$ 785	\$706.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
11/30/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	5.1	\$ 1,025	\$5,227.50
12/2/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situation; prepare email messages to B. McNamara regarding class members' situations; prepare email messages to B. McNamara regarding preparing draft corrections email for DOJ/USCIS' preliminary December report.	5.6	\$ 545	\$3,052.00
12/2/2018	St. Romain, Kate	Redline of cross-motion/opposition; email J. Wollenberg regarding cross-motion/opposition.	0.3	\$ 785	\$235.50
12/3/2018	Baruch, Douglas W.	Address DOJ correspondence.	0.6	\$ 1,350	\$810.00
12/3/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	10.6	\$ 545	\$5,777.00
12/3/2018	McNamara, Brendan	Prepare final errata for government's monthly Nio report.	1.1	\$ 315	\$346.50
12/3/2018	Raol, Neaha	Confer with class members re: status updates / next steps.	0.7	\$ 960	\$672.00
12/3/2018	St. Romain, Kate	Email and call B. McNamara regarding MAVNI reports; prepare analysis comparing November and October Nio reports; coordinate team meeting regarding Nio SJ opposition and Calixto update; review administrative records for Tiger Team report and email J. Wollenberg regrading the same.	1.6	\$ 785	\$1,256.00
12/3/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare SJ materials.	4.8	\$ 1,025	\$4,920.00
12/4/2018	Baruch, Douglas W.	Address summary judgment research and opposition and team meeting re same.	4.8	\$ 1,350	\$6,480.00
12/4/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	8.4	\$ 545	\$4,578.00
12/4/2018	Raol, Neaha	Confer with various class members, B, McNamara, J. Wollenberg, and others on team re: various matters.	1.0	\$ 960	\$960.00
12/4/2018	Stachniak Kaplan, Kayla	Review Government Opposition to summary judgment.	0.2	\$ 960	\$192.00
12/4/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare SJ materials; review latest "draft" report from Defendants.	5.2	\$ 1,025	\$5,330.00
12/5/2018	Baruch, Douglas W.	Team meeting; research; DOJ correspondence.	4.5	\$ 1,350	\$6,075.00
12/5/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to K. Grisez regarding class member situation; review Defendants' Opposition to Plaintiffs' Motion for Partial Summary Judgment and Cross Motion for Summary Judgment in Favor of Defendants; attend conference with team members regarding Defendants' motion.	7.2	\$ 545	\$3,924.00
12/5/2018	McNamara, Brendan	Review soldiers' emails regarding naturalization; compare information against Nio December report; prepare document cross-referencing the lists for J. Wollenberg.	1.9	\$ 315	\$598.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/5/2018	Raol, Neaha	Review government's summary judgment opposition and cross-motion; team meeting re: same and next steps in related case; conference with class member re: DOJ report/update; review DOJ status report.	4.0	\$ 960	\$3,840.00
12/5/2018	St. Romain, Kate	Attend team meeting regarding Nio SJ opposition reply and Calixto updates.	1.6	\$ 785	\$1,256.00
12/5/2018	Stachniak Kaplan, Kayla	Team meeting.	1.4	\$ 960	\$1,344.00
12/5/2018	Stuart, Brian C.	Telephone conference with D. Baruch, J. Wollenberg, et al.	1.4	\$ 730	\$1,022.00
12/5/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare SJ materials; review/email re deficiencies in draft Defendants' report.	6.3	\$ 1,025	\$6,457.50
12/6/2018	Baruch, Douglas W.	Address summary judgment motion.	3.0	\$ 1,350	\$4,050.00
12/6/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; prepare email message to J. Wollenberg regarding open task items in Nio case; attend conference with J. Wollenberg regarding open task items in Nio case.	7.2	\$ 545	\$3,924.00
12/6/2018	LoPresti, Elizabeth	Review re summary judgment.	0.9	\$ 545	\$490.50
12/6/2018	McNamara, Brendan	Review solders' emails regarding naturalization.	0.4	\$ 315	\$126.00
12/6/2018	Raol, Neaha	Confer with soldier re: USCIS status / background check delay and next steps; follow-up correspondence with B. Stuart re: class cert arguments; confer with K. St. Romain re: team updates.	1.1	\$ 960	\$1,056.00
12/6/2018	St. Romain, Kate	Email K. Grisez regarding MAVNI research project for summary judgment citations.	0.2	\$ 785	\$157.00
12/6/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare SJ materials and team meeting re same.	4.9	\$ 1,025	\$5,022.50
12/7/2018	Baruch, Douglas W.	Review transcripts in similar matter; DOJ correspondence.	3.0	\$ 1,350	\$4,050.00
12/7/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	4.4	\$ 545	\$2,398.00
12/7/2018	Raol, Neaha	Confer with numerous class members; follow-up internally re: same; review recent news, Tiwari material; confer with various team members, including B. McNamara, J. Wollenberg.	5.9	\$ 960	\$5,664.00
12/7/2018	St. Romain, Kate	Review bi-weekly status report and email bi-weekly status report to named plaintiffs; address summary judgment project	0.8	\$ 785	\$628.00
12/7/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare SJ materials.	6.3	\$ 1,025	\$6,457.50
12/8/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.6	\$ 545	\$327.00
12/9/2018	Baruch, Douglas W.	Review trial testimony from similar matter.	1.5	\$ 1,350	\$2,025.00
12/9/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email message to J. Wollenberg regarding contacting class members.	0.4	\$ 545	\$218.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/10/2018	Baruch, Douglas W.	Address summary judgment and confer with J. Wollenberg re status.	4.0	\$ 1,350	\$5,400.00
12/10/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	3.8	\$ 545	\$2,071.00
12/10/2018	Raol, Neaha	Confer with various class members re: status / next steps; review updates/correspondence from DOJ.	1.5	\$ 960	\$1,440.00
12/10/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	9.6	\$ 1,025	\$9,840.00
12/11/2018	Baruch, Douglas W.	Client calls, DOJ correspondence, research and address summary judgment.	4.5	\$ 1,350	\$6,075.00
12/11/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	2.3	\$ 545	\$1,253.50
12/11/2018	LoPresti, Elizabeth	Conference with J. Wollenberg and B. Stuart regarding motion for summary judgment research; conduct legal research regarding USCIS standards for naturalization.	5.4	\$ 545	\$2,943.00
12/11/2018	McNamara, Brendan	Review soldiers' emails regarding naturalization.	1.0	\$ 315	\$315.00
12/11/2018	Raol, Neaha	Review hearing transcript for Nov. 14 hearing; correspondence re: SJM brief; confer with various class members and review material/updates from them; follow-up re: same.	2.9	\$ 960	\$2,784.00
12/11/2018	Stuart, Brian C.	Research "good moral character" and "attachment to the Constitution"; Draft section for MSJ response/reply.	4.5	\$ 730	\$3,285.00
12/11/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	10.8	\$ 1,025	\$11,070.00
12/12/2018	Baruch, Douglas W.	Multiple calls and emails re DOJ correspondence and status; address summary judgment.	4.5	\$ 1,350	\$6,075.00
12/12/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	3.7	\$ 545	\$2,016.50
12/12/2018	LoPresti, Elizabeth	Conduct legal research regarding attachment to the Constitution.	5.0	\$ 545	\$2,725.00
12/12/2018	Raol, Neaha	Confer with class members; review documents/material received from class members re: MSSD and/or USCIS N-400 status.	1.8	\$ 960	\$1,728.00
12/12/2018	St. Romain, Kate	Address summary judgment research project.	0.3	\$ 785	\$235.50
12/12/2018	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; review research regarding CAR citations.	1.0	\$ 960	\$960.00
12/12/2018	Stuart, Brian C.	Research "good moral character" and "attachment to the Constitution"; Draft section for MSJ response/reply.	2.6	\$ 730	\$1,898.00
12/12/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	10.6	\$ 1,025	\$10,865.00
12/13/2018	Baruch, Douglas W.	Address summary judgment issues.	4.5	\$ 1,350	\$6,075.00
12/13/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	2.0	\$ 350	\$700.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/13/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.5	\$ 545	\$817.50
12/13/2018	LoPresti, Elizabeth	Conference with J. Wollenberg and B. Stuart; legal research regarding attachment to the Constitution; prepare draft paragraphs for amended summary judgment motion.	6.4	\$ 545	\$3,488.00
12/13/2018	Raol, Neaha	Review correspondence/documents re: reinstatement; confer/correspondence with class members and review documents re: discharge; internal correspondence re: same; high level review of new DOJ report re: status of class members.	2.1	\$ 960	\$2,016.00
12/13/2018	St. Romain, Kate	Call with MAVNI soldier; email A. Rosen regarding research project.	0.3	\$ 785	\$235.50
12/13/2018	Stachniak Kaplan, Kayla	Prepare summary judgment section regarding CAR citations.	3.0	\$ 960	\$2,880.00
12/13/2018	Stuart, Brian C.	Research "good moral character" and "attachment to the Constitution"; Draft section for MSJ response/reply.	2.2	\$ 730	\$1,606.00
12/13/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	9.7	\$ 1,025	\$9,942.50
12/14/2018	Baruch, Douglas W.	Address DOJ correspondence; review reports; client calls; confer with J. Wollenberg; address motion research.	4.5	\$ 1,350	\$6,075.00
12/14/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	2.5	\$ 350	\$875.00
12/14/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend conference with J. Wollenberg regarding open action items and how to respond to certain class member situations.	6.1	\$ 545	\$3,324.50
12/14/2018	LoPresti, Elizabeth	Conference with B. Stuart regarding drafting assignment; draft paragraphs for court filing; legal research regarding good moral character in the naturalization context.	7.6	\$ 545	\$4,142.00
12/14/2018	McNamara, Brendan	Discuss project with A. Fitzgerald concerning missing soldiers.	0.3	\$ 315	\$94.50
12/14/2018	Raol, Neaha	Confer and follow-up correspondence with various Nio class members; confer with J. Wollenberg re: status/SJM briefing; review blackline of DOJ opposition/cross SJM brief.	1.8	\$ 960	\$1,728.00
12/14/2018	Stachniak Kaplan, Kayla	Prepare summary judgment section regarding CAR citations.	2.5	\$ 960	\$2,400.00
12/14/2018	Stuart, Brian C.	Research "good moral character" and "attachment to the Constitution"; Draft section for MSJ response/reply.	10.1	\$ 730	\$7,373.00
12/14/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	6.5	\$ 1,025	\$6,662.50
12/15/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.4	\$ 545	\$763.00
12/15/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with team members; prep re SJ motion.	0.3	\$ 1,025	\$307.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/16/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	1.3	\$ 545	\$708.50
12/16/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	1.7	\$ 1,025	\$1,742.50
12/17/2018	Baruch, Douglas W.	Research and address summary judgment and status.	4.5	\$ 1,350	\$6,075.00
12/17/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	2.5	\$ 350	\$875.00
12/17/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	5.5	\$ 545	\$2,997.50
12/17/2018	McNamara, Brendan	Discuss project with J. Wollenberg concerning missing or unaccounted for soldiers.	0.2	\$ 315	\$63.00
12/17/2018	Raol, Neaha	Confer with various class members; internal follow-up re: same.	2.1	\$ 960	\$2,016.00
12/17/2018	St. Romain, Kate	Call and email K. Kaplan regarding administrative record.	0.2	\$ 785	\$157.00
12/17/2018	Stachniak Kaplan, Kayla	Draft summary judgment opposition/reply section on CAR references.	3.1	\$ 960	\$2,976.00
12/17/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; discuss SJ briefing with J. Lobue and D. Baruch.	5.8	\$ 1,025	\$5,945.00
12/18/2018	Baruch, Douglas W.	Address summary judgment.	2.5	\$ 1,350	\$3,375.00
12/18/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 350	\$1,750.00
12/18/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; prepare email messages to B. McNamara regarding class member situations.	8.5	\$ 545	\$4,632.50
12/18/2018	McNamara, Brendan	Respond to soldiers' emails and compile data in chart.	1.2	\$ 315	\$378.00
12/18/2018	Raol, Neaha	Review articles re: MAVNI naturalization issues/pending cases; confer with various MAVNIs re: status, updates and follow-up correspondence (internal and with DOJ) re: same; review documents from class members and internal/external correspondence re: same.	1.8	\$ 960	\$1,728.00
12/18/2018	St. Romain, Kate	Call and email S. Johnson regarding emails to government for MAVNI soldiers; email and call J. Wollenberg regarding summary judgment; research for summary judgment reply and email J. Wollenberg regarding the same.	1.6	\$ 785	\$1,256.00
12/18/2018	Stachniak Kaplan, Kayla	Draft constitutional section of summary judgment reply/opposition; discuss case with J. Wollenberg; discuss case with N. Raol.	3.0	\$ 960	\$2,880.00
12/18/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; discuss SJ briefing with J. Lobue and D. Baruch.	6.2	\$ 1,025	\$6,355.00
12/19/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 350	\$1,750.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/19/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; attend teleconferences with J. Wollenberg regarding class member situations; legal research for revised motion for summary judgment regarding changes in cases cited by opposition's cross-motion.	6.2	\$ 545	\$3,379.00
12/19/2018	Raol, Neaha	Draft various emails to DOJ re: individual MAVNIs; confer with class members, team members re: same; confer with class members re: status on DOJ reports and requests for investigation documents; confer with B. McNamara re: follow-up with class members and review documents/prepared material re: same.	3.9	\$ 960	\$3,744.00
12/19/2018	St. Romain, Kate	Email named plaintiffs regarding bi-weekly status report; email J. Wollenberg regarding updates to MAVNI litigation website; coordinate updates to MAVNI litigation website; calls with J. Wollenberg regarding research for summary judgment.	0.5	\$ 785	\$392.50
12/19/2018	Stachniak Kaplan, Kayla	Prepare constitutional section of summary judgment opposition/reply; analyze CAR references.	1.3	\$ 960	\$1,248.00
12/19/2018	Wollenberg, Jennifer	Prepare summary judgment brief and motion to strike; address MAVNI issues/updates/concerns.	14.2	\$ 1,025	\$14,555.00
12/19/2018	Woods, Elizabeth	Review case law regarding discharge of U.S. soldiers; prepare summary of research findings.	1.5	\$ 630	\$945.00
12/20/2018	Baruch, Douglas W.	Drafting and revising summary judgment brief and correspondence with DOJ.	6.5	\$ 1,350	\$8,775.00
12/20/2018	Hinnant, H. Coleman	Cite check memo in support of plaintiff's motion for summary judgment (J. Wollenberg).	4.5	\$ 275	\$1,237.50
12/20/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; legal research for revised motion for summary judgment regarding D.C. Circuit rules concerning judicial notice in an APA case; prepare email messages to J. Wollenberg regarding legal research for revised summary judgment motion.	10.8	\$ 545	\$5,886.00
12/20/2018	Raol, Neaha	Review / confer with J. Wollenberg re: material to cite/quote in Nio summary judgment briefing; review material from common interest counsel re: Army guidance; review USCIS responses to specific class member inquiries; confer with various class members re: status / updates / naturalization interview/oath ceremony updates; review constitutional section of summary judgment brief.	5.1	\$ 960	\$4,896.00
12/20/2018	St. Romain, Kate	Research USCIS CAR inaccuracies; prepare outline of USCIS CAR inaccuracies for J. Wollenberg.	1.3	\$ 785	\$1,020.50
12/20/2018	Stachniak Kaplan, Kayla	Prepare constitutional section of summary judgment reply/opposition; prepare motion to strike; discuss case with J. Wollenberg.	8.6	\$ 960	\$8,256.00
12/20/2018	Wollenberg, Jennifer	Prepare summary judgment brief and motion to strike; address MAVNI issues/updates/concerns.	18.7	\$ 1,025	\$19,167.50
12/21/2018	Baruch, Douglas W.	Summary judgment brief and motion to strike.	7.5	\$ 1,350	\$10,125.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/21/2018	Hinnant, H. Coleman	Cite check memo in support of plaintiff's motion for summary judgment; cite check memo in support of motion to strike (J. Wollenberg).	5.5	\$ 275	\$1,512.50
12/21/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconferences with Kate St. Romain regarding cite checking final motion for summary judgment; cite check final motion for summary judgment; prepare email messages to J. Wollenberg, K. Kaplan, N. Raol, and K. St. Romain regarding revisions to final motion for summary judgment; cite checking final motion to strike opposition pleadings; prepare email messages to J. Wollenberg regarding revisions to final motion to strike opposition pleadings; attend conferences with N. Raol regarding revisions to final motion for summary judgment.	9.4	\$ 545	\$5,123.00
12/21/2018	McNamara, Brendan	Respond to soldiers' emails and compile data in chart.	0.6	\$ 315	\$189.00
12/21/2018	Raol, Neaha	Review/revise motion to strike and related papers; review/revise/finalize for filing summary judgment motion reply and opposition to cross motion; confer with various team members re: same; confer with class members re: updates/naturalization interviews/oath ceremony status.	10.1	\$ 960	\$9,696.00
12/21/2018	St. Romain, Kate	Edit memorandum in support of motion for partial summary judgment; email and call J. Wollenberg and N. Raol regarding memorandum in support of motion for partial summary judgment; email and call S. Johnson regarding citations for memorandum in support of motion for partial summary judgment.	3.4	\$ 785	\$2,669.00
12/21/2018	Stachniak Kaplan, Kayla	Prepare Motion to Strike; prepare summary judgment Opposition/Reply.	7.4	\$ 960	\$7,104.00
12/21/2018	Wollenberg, Jennifer	Prepare and finalize summary judgment brief and motion to strike; address MAVNI issues/updates/concerns.	18.5	\$ 1,025	\$18,962.50
12/22/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations and open task items in Nio case; attend teleconference with J. Wollenberg regarding class member situations and open task items in Nio case.	3.9	\$ 545	\$2,125.50
12/23/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	2.3	\$ 545	\$1,253.50
12/24/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.3	\$ 545	\$163.50
12/24/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.3	\$ 1,025	\$3,382.50
12/25/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.4	\$ 545	\$763.00
12/25/2018	Raol, Neaha	Correspondence re: individual class members.	0.4	\$ 960	\$384.00
12/25/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.2	\$ 1,025	\$3,280.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
12/26/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	3.7	\$ 350	\$1,295.00
12/26/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	3.6	\$ 545	\$1,962.00
12/26/2018	McNamara, Brendan	Review and respond to soldiers' emails; chart data; draft emails to DOJ.	2.7	\$ 315	\$850.50
12/26/2018	Raol, Neaha	Review DOJ filings re: stay of deadlines/filings; internal correspondence re: same.	0.5	\$ 960	\$480.00
12/26/2018	Raol, Neaha	Correspondence with individual class members; confer with same; review Tiwari testimony; confer with J. Wollenberg, K. St. Romain re: courtesy copies for court of SJM reply brief papers.	1.7	\$ 960	\$1,632.00
12/26/2018	St. Romain, Kate	Address motion to dismiss reply and motion to strike filings; coordinate updates to MAVNI litigation website.	1.9	\$ 785	\$1,491.50
12/26/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review MAVNI USCIS submission re "uncharacterized" discharge.	4.2	\$ 1,025	\$4,305.00
12/27/2018	Baruch, Douglas W.	Address legal memorandum re class member.	1.0	\$ 1,350	\$1,350.00
12/27/2018	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	3.7	\$ 350	\$1,295.00
12/27/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg and N. Raol regarding class member situations.	3.2	\$ 545	\$1,744.00
12/27/2018	McNamara, Brendan	Research status of certain MAVNI soldiers; draft emails to soldiers/DOJ; log soldiers' data.	1.5	\$ 315	\$472.50
12/27/2018	Raol, Neaha	Internal correspondence re: individual MAVNI/class member status/update; identify documents/material for individual MAVNI and confer with J. Wollenberg re: same.	1.8	\$ 960	\$1,728.00
12/27/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review and comment on MAVNI USCIS submission re "uncharacterized" discharge.	3.9	\$ 1,025	\$3,997.50
12/28/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding research project.	4.1	\$ 545	\$2,234.50
12/28/2018	Raol, Neaha	Prepare material for individual class member; confer with J. Wollenberg re: same.	0.8	\$ 960	\$768.00
12/28/2018	St. Romain, Kate	Email J. Wollenberg regarding naturalized soldier and Nio inbox responses; email B. McNamara regarding docket entry.	0.3	\$ 785	\$235.50
12/28/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	2.5	\$ 1,025	\$2,562.50
12/31/2018	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.4	\$ 545	\$218.00
12/31/2018	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	1.6	\$ 1,025	\$1,640.00
1/1/2019	Wollenberg, Jennifer	Discussions with MAVNIs re issues/updates/concerns relating to naturalization applications.	0.3	\$ 1,075	\$322.50
1/2/2019	Baruch, Douglas W.	Address DOJ filing.	0.6	\$ 1,415	\$849.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/2/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	7.1	\$ 575	\$4,082.50
1/2/2019	Raol, Neaha	Review docket updates/court order; email correspondence with class members, S. Johnson re: same.	1.2	\$ 1,000	\$1,200.00
1/2/2019	St. Romain, Kate	Review updates to MAVNI litigation website and email regarding the same.	0.2	\$ 825	\$165.00
1/2/2019	Wollenberg, Jennifer	Address issues/updates/concerns of MAVNIs; oppose extension request.	0.9	\$ 1,075	\$967.50
1/3/2019	Baruch, Douglas W.	Address status and DOJ correspondence.	1.5	\$ 1,415	\$2,122.50
1/3/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; attend teleconference with J. Wollenberg regarding class member situations and open items.	5.3	\$ 575	\$3,047.50
1/3/2019	Raol, Neaha	Confer/correspondence with various class members re: status/updates; correspondence/confer with S. Johnson, J. Wollenberg re: individual class member; review ABA and law360 articles re: lawsuits/claims; confer with J. Wollenberg re: same; review DOJ reports/status updates.	2.7	\$ 1,000	\$2,700.00
1/3/2019	Stachniak Kaplan, Kayla	Review extension requests and orders.	0.2	\$ 1,000	\$200.00
1/3/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, team members, and others.	8.3	\$ 1,075	\$8,922.50
1/4/2019	Baruch, Douglas W.	Address status and DOJ correspondence.	0.5	\$ 1,415	\$707.50
1/4/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations and open items; attend teleconference with J. Wollenberg regarding open items.	7.9	\$ 575	\$4,542.50
1/4/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.4	\$ 335	\$134.00
1/4/2019	Raol, Neaha	Confer with various class members; review documents re: background checks/FOIA requests from class members.	1.6	\$ 1,000	\$1,600.00
1/4/2019	Stachniak Kaplan, Kayla	Analyze media and related case filings.	0.2	\$ 1,000	\$200.00
1/4/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	6.5	\$ 1,075	\$6,987.50
1/6/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	2.0	\$ 575	\$1,150.00
1/7/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	4.5	\$ 370	\$1,665.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/7/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconference with J. Wollenberg regarding class member situation; prepare email messages to B. McNamara and A. Fitzgerald regarding class member situations; attend teleconference with class member regarding rescheduling call with J. Wollenberg.	6.3	\$ 575	\$3,622.50
1/7/2019	McNamara, Brendan	Email soldiers regarding status of individual cases and chart soldiers' data.	1.7	\$ 335	\$569.50
1/7/2019	Raol, Neaha	Confer with Nio class members re: status/questions/guidance.	0.4	\$ 1,000	\$400.00
1/7/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.8	\$ 1,075	\$4,085.00
1/8/2019	Baruch, Douglas W.	Address developments re Court inquiries and order; address DOJ correspondence.	1.5	\$ 1,415	\$2,122.50
1/8/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	3.3	\$ 370	\$1,221.00
1/8/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to B. McNamara regarding class member situations.	7.6	\$ 575	\$4,370.00
1/8/2019	McNamara, Brendan	Review solders' emails and respond to concerns regarding naturalization.	1.1	\$ 335	\$368.50
1/8/2019	Raol, Neaha	Review court's order; confer with various class members re: status/reports; confer/correspondence with J. Wollenberg re: same/updates to class member and K. St. Romain, S. Johnson re: website.	0.8	\$ 1,000	\$800.00
1/8/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.7	\$ 1,075	\$3,977.50
1/9/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 370	\$1,850.00
1/9/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to A. Fitzgerald regarding class member situations; prepare email messages to J. Wollenberg regarding class member situations and open items; attend teleconferences with J. Wollenberg regarding class member situations.	5.3	\$ 575	\$3,047.50
1/9/2019	McNamara, Brendan	Review solders' emails and respond to concerns regarding naturalization.	0.3	\$ 335	\$100.50
1/9/2019	Raol, Neaha	Confer with class member re: status; follow-up with S. Johnson/Nio class inbox; review legal articles/ABA journal re: MAVNI lawsuits/actions.	0.9	\$ 1,000	\$900.00
1/9/2019	St. Romain, Kate	Call with MAVNI soldier regarding naturalization; meet with J. Wollenberg regarding MAVNI litigation website updates.	0.6	\$ 825	\$495.00
1/9/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including meeting with K. St. Romain re website updates.	6.8	\$ 1,075	\$7,310.00
1/10/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 370	\$1,850.00
1/10/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	6.9	\$ 575	\$3,967.50
1/10/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.2	\$ 335	\$67.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/10/2019	St. Romain, Kate	Draft updates to MAVNI litigation website; call and email MAVNI soldier regarding naturalization interview process.	0.8	\$ 825	\$660.00
1/10/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	7.3	\$ 1,075	\$7,847.50
1/11/2019	Baruch, Douglas W.	Address DOJ correspondence and status.	1.5	\$ 1,415	\$2,122.50
1/11/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	3.0	\$ 370	\$1,110.00
1/11/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	6.3	\$ 575	\$3,622.50
1/11/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	5.6	\$ 1,075	\$6,020.00
1/12/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.4	\$ 575	\$230.00
1/13/2019	McNamara, Brendan	Review solder's file and draft email to DOJ on soldier's behalf.	0.5	\$ 335	\$167.50
1/14/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to K. St. Romain regarding class member situation; prepare email messages to J. Wollenberg regarding class member situations; attend teleconference with K. St. Romain regarding drafting language for litigation website requesting that certain class members contact us; prepare redacted copy of document provided by class member; attend teleconferences with J. Wollenberg regarding class member situations.	8.2	\$ 575	\$4,715.00
1/14/2019	Raol, Neaha	Confer/correspondence with Nio class member; follow-up internally as needed.	0.5	\$ 1,000	\$500.00
1/14/2019	St. Romain, Kate	Email S. Johnson regarding naturalization interview documents and MAVNI soldier response; email and call S. Johnson regarding website updates; email common interest counsel regarding update.	0.7	\$ 825	\$577.50
1/14/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	5.2	\$ 1,075	\$5,590.00
1/15/2019	Baruch, Douglas W.	Address DOJ correspondence.	0.8	\$ 1,415	\$1,132.00
1/15/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	2.1	\$ 575	\$1,207.50
1/15/2019	Raol, Neaha	Confer/correspondence with various Nio class members re: status, DOJ reports, etc.; follow-up internally re: same.	1.3	\$ 1,000	\$1,300.00
1/15/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.8	\$ 1,075	\$5,160.00
1/16/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	4.5	\$ 370	\$1,665.00
1/16/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.1	\$ 575	\$632.50
1/16/2019	Raol, Neaha	Confer with class member re: status/update.	0.3	\$ 1,000	\$300.00
1/16/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.4	\$ 1,075	\$4,730.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/17/2019	Baruch, Douglas W.	Address DOJ and DHS correspondence.	0.5	\$ 1,415	\$707.50
1/17/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	0.7	\$ 370	\$259.00
1/17/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconference with M. Kiziltay Carter regarding class member situation.	2.6	\$ 575	\$1,495.00
1/17/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.7	\$ 1,075	\$5,052.50
1/18/2019	Baruch, Douglas W.	Address status and soldier inquiries.	1.5	\$ 1,415	\$2,122.50
1/18/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; prepare email messages to J. Wollenberg regarding class member situations.	4.2	\$ 575	\$2,415.00
1/18/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.9	\$ 1,075	\$5,267.50
1/19/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
1/19/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	0.5	\$ 1,075	\$537.50
1/20/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situation.	1.5	\$ 575	\$862.50
1/21/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situation.	1.3	\$ 575	\$747.50
1/21/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	0.8	\$ 1,075	\$860.00
1/22/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email message to N. Raol regarding class member situation.	6.8	\$ 575	\$3,910.00
1/22/2019	Raol, Neaha	Confer with Nio class members; internal follow-up re: DOD investigation reports.	2.4	\$ 1,000	\$2,400.00
1/22/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	3.4	\$ 1,075	\$3,655.00
1/23/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 370	\$1,850.00
1/23/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; prepare list of open items in Nio case for discussion; attend conference with J. Wollenberg regarding open items in Nio case.	8.7	\$ 575	\$5,002.50
1/23/2019	Raol, Neaha	Conference with various class members; internal correspondence with J. Wollenberg re: same.	2.4	\$ 1,000	\$2,400.00
1/23/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; meeting with S. Johnson re Nio mailbox.	3.2	\$ 1,075	\$3,440.00
1/24/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	4.5	\$ 370	\$1,665.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/24/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	4.4	\$ 575	\$2,530.00
1/24/2019	Raol, Neaha	Confer with class members; review Dec. comprehensive class member reports; email correspondence/follow-up with A. Fitzgerald re: MAVNI contact/status/follow-up.	1.5	\$ 1,000	\$1,500.00
1/24/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including communications with MAVNIs and common interest counsel; review of MAVNI draft.	5.4	\$ 1,075	\$5,805.00
1/25/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.2	\$ 370	\$1,924.00
1/25/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	7.1	\$ 575	\$4,082.50
1/25/2019	St. Romain, Kate	Review Court order; coordinate updates to MAVNI Litigation website.	0.2	\$ 825	\$165.00
1/25/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review MAVNI drafts; discussions with MAVNIs and common interest counsel.	4.4	\$ 1,075	\$4,730.00
1/26/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.3	\$ 575	\$172.50
1/26/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; discussion with common interest counsel and review of MAVNI draft.	3.2	\$ 1,075	\$3,440.00
1/27/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
1/27/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	0.4	\$ 1,075	\$430.00
1/28/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	8.3	\$ 575	\$4,772.50
1/28/2019	Raol, Neaha	Confer with Nio class member; review docket entries, upcoming reporting order by court.	1.0	\$ 1,000	\$1,000.00
1/28/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.2	\$ 1,075	\$4,515.00
1/29/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 370	\$1,850.00
1/29/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	4.7	\$ 575	\$2,702.50
1/29/2019	Raol, Neaha	Confer with Nio class member re: status/next steps.	0.2	\$ 1,000	\$200.00
1/29/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	3.5	\$ 1,075	\$3,762.50
1/30/2019	Baruch, Douglas W.	Address strategy and DOJ correspondence.	1.5	\$ 1,415	\$2,122.50
1/30/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	4.5	\$ 370	\$1,665.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
1/30/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; prepare list of open items in Nio case; prepare email message to A. Fitzgerald regarding following up with class members; prepare email messages to K. Grisez regarding class member situation.	4.9	\$ 575	\$2,817.50
1/30/2019	Raol, Neaha	Confer/correspondence with Nio class members.	1.8	\$ 1,000	\$1,800.00
1/30/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	3.3	\$ 1,075	\$3,547.50
1/31/2019	Baruch, Douglas W.	Address similar matter decision and DOJ correspondence.	1.8	\$ 1,415	\$2,547.00
1/31/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 370	\$1,850.00
1/31/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to A. Fitzgerald regarding class member situations; prepare email messages to J. Wollenberg regarding class member situations; prepare list of open items for J. Wollenberg; attend conference with J. Wollenberg regarding open items in Nio case.	4.2	\$ 575	\$2,415.00
1/31/2019	Raol, Neaha	Confer with Nio class member; correspondence with DOJ/USCIS re: status of Nio class member in BCT; review Tiwari opinion/order; confer with D. Baruch re: same; review articles/news re: MAVNI lawsuits; confer with J. Wollenberg re: contact with class members.	1.1	\$ 1,000	\$1,100.00
1/31/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.2	\$ 1,075	\$4,515.00
2/1/2019	Baruch, Douglas W.	Confer with common interest counsel re similar matter decision and address strategy; correspondence with DOJ/USCIS.	2.0	\$ 1,415	\$2,830.00
2/1/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to A. Fitzgerald and J. Wollenberg regarding meeting to discuss new project.	4.6	\$ 575	\$2,645.00
2/1/2019	Raol, Neaha	Confer with Nio class members; review related complaint and compare to class list.	0.3	\$ 1,000	\$300.00
2/1/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.6	\$ 1,075	\$3,870.00
2/2/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.6	\$ 575	\$345.00
2/3/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situation.	1.0	\$ 575	\$575.00
2/4/2019	Baruch, Douglas W.	Address decision in similar matter and pleading.	2.4	\$ 1,415	\$3,396.00
2/4/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	5.0	\$ 370	\$1,850.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
2/4/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend conference with J. Wollenberg and A. Fitzgerald regarding project concerning identifying and following up with MAVNIs whose naturalizations have been unduly delayed; prepare email messages to J. Wollenberg regarding class member situations; prepare email messages to K. Grisez regarding class member situations.	7.1	\$ 575	\$4,082.50
2/4/2019	Raol, Neaha	Review Tiwari / Kuang case papers; pull and review legislative history/update re: MAVNI BCT/background check requirements; confer/correspondence with J. Wollenberg re: same.	3.4	\$ 1,000	\$3,400.00
2/4/2019	Stachniak Kaplan, Kayla	Prepare notification of supplemental authority (Tiwari).	5.7	\$ 1,000	\$5,700.00
2/4/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	5.2	\$ 1,075	\$5,590.00
2/5/2019	Baruch, Douglas W.	Address similar matter decision and notice to DDC re decision.	1.5	\$ 1,415	\$2,122.50
2/5/2019	Fitzgerald, Amber	Audit of correspondence in Outlook to provide current status of communications with class action members.	2.0	\$ 370	\$740.00
2/5/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations; attend teleconference with J. Wollenberg regarding class member situations.	5.4	\$ 575	\$3,105.00
2/5/2019	McNamara, Brendan	Respond to soldiers' email re naturalization.	0.2	\$ 335	\$67.00
2/5/2019	Raol, Neaha	Review/comment on notice of supplementary authority (re: Tiwari); confer with J. Wollenberg re: same; review notices filed in other cases; confer with class members.	1.1	\$ 1,000	\$1,100.00
2/5/2019	St. Romain, Kate	Edit Plaintiffs' Notice of Supplemental Authority and communicate with J. Wollenberg regarding the same; prepare exhibits for Notice of Supplemental Authority.	0.9	\$ 825	\$742.50
2/5/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others; draft and file "supplemental authority" notice.	6.4	\$ 1,075	\$6,880.00
2/6/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	2.7	\$ 575	\$1,552.50
2/6/2019	Raol, Neaha	Confer with multiple class members re: status, updates and next steps.	1.3	\$ 1,000	\$1,300.00
2/6/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	4.3	\$ 1,075	\$4,622.50
2/7/2019	Baruch, Douglas W.	Strategy call with counsel.	1.5	\$ 1,415	\$2,122.50
2/7/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	2.4	\$ 575	\$1,380.00
2/7/2019	Raol, Neaha	Confer with class members re: status, update on case/reporting.	0.9	\$ 1,000	\$900.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/7/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	3.6	\$ 1,075	\$3,870.00
2/8/2019	Baruch, Douglas W.	Review and address DOJ status report.	1.5	\$ 1,415	\$2,122.50
2/8/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding open items in Nio case; attend conference with J. Wollenberg regarding open items in Nio case.	3.7	\$ 575	\$2,127.50
2/8/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others; meeting with S. Johnson re Nio mailbox.	1.5	\$ 1,075	\$1,612.50
2/9/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.6	\$ 575	\$345.00
2/10/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.3	\$ 575	\$172.50
2/11/2019	Baruch, Douglas W.	Address DOJ report.	1.4	\$ 1,415	\$1,981.00
2/11/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.8	\$ 575	\$460.00
2/11/2019	Raol, Neaha	Conference/correspondence with class members.	0.8	\$ 1,000	\$800.00
2/11/2019	Stachniak Kaplan, Kayla	Analyze Defendants' reporting.	0.3	\$ 1,000	\$300.00
2/11/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	3.5	\$ 1,075	\$3,762.50
2/12/2019	Baruch, Douglas W.	Address status and strategy; legal research re related matters; confer with J. Wollenberg.	4.5	\$ 1,415	\$6,367.50
2/12/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding class member situations.	1.4	\$ 575	\$805.00
2/12/2019	Raol, Neaha	Confer with various class members/follow-up.	0.9	\$ 1,000	\$900.00
2/12/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	2.4	\$ 1,075	\$2,580.00
2/13/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.8	\$ 575	\$460.00
2/13/2019	Raol, Neaha	Confer/correspondence with class members; confer with J. Wollenberg re: same.	0.8	\$ 1,000	\$800.00
2/13/2019	St. Romain, Kate	Coordinate updates to Nio page of MAVNI litigation website; analyze February 8 Nio report; email J. Wollenberg regarding analysis of February 8 Nio report.	0.8	\$ 825	\$660.00
2/13/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.3	\$ 1,075	\$4,622.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/14/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email message to J. Wollenberg regarding managing Nio inbox workflow; attend teleconference with J. Wollenberg regarding managing Nio inbox workflow; prepare email messages to J. Wollenberg regarding class member situations; attend teleconference with Nio class member regarding his situation; attend conference with N. Szlarb, E. LoPresti, and B. McNamara regarding managing Nio inbox workflow.	1.8	\$ 575	\$1,035.00
2/14/2019	LoPresti, Elizabeth	Conference with S. Johnson, B. McNamara, and N. Szlarb regarding Nio inbox duties.	0.5	\$ 575	\$287.50
2/14/2019	McNamara, Brendan	Review government policies; meet with team to discuss handling responses to soldiers emails.	1.0	\$ 335	\$335.00
2/14/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including call with common interest counsel.	5.2	\$ 1,075	\$5,590.00
2/15/2019	Baruch, Douglas W.	Address DOJ reply brief, DOJ correspondence, and confer with J. Wollenberg re status and strategy; address inquiries.	2.8	\$ 1,415	\$3,962.00
2/15/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.6	\$ 335	\$536.00
2/15/2019	Raol, Neaha	Review DOJ summary judgment cross reply brief and brief re: motion to stay/motion to strike; confer with Nio class members re: update/status.	2.3	\$ 1,000	\$2,300.00
2/15/2019	Stachniak Kaplan, Kayla	Review summary judgment filings.	0.2	\$ 1,000	\$200.00
2/15/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.2	\$ 670	\$1,474.00
2/15/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review Nio filings and discussions re same.	4.1	\$ 1,075	\$4,407.50
2/16/2019	Baruch, Douglas W.	Review and address DOJ filing.	0.6	\$ 1,415	\$849.00
2/16/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email message to A. Fitzgerald regarding following up with Nio class members.	2.1	\$ 575	\$1,207.50
2/17/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email message to A. Fitzgerald regarding following up with Nio class members.	0.6	\$ 575	\$345.00
2/18/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.4	\$ 670	\$1,608.00
2/18/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review Nio SJ filing.	4.8	\$ 1,075	\$5,160.00
2/19/2019	Baruch, Douglas W.	Address possible response to DOJ report and filing.	1.5	\$ 1,415	\$2,122.50
2/19/2019	Johnson, Sam	Prepare email messages to K. Grisez regarding Nio class member; prepare email message to N. Szlarb regarding responding to Nio class members.	0.5	\$ 575	\$287.50
2/19/2019	Stachniak Kaplan, Kayla	Analyze a decision and arguments.	0.4	\$ 1,000	\$400.00
2/19/2019	Szlarb, Natalia	Respond to Nio class members communications; conference with Jenny Wollenberg to discuss the responses.	3.2	\$ 670	\$2,144.00
2/19/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including meeting re Nio mailbox.	4.5	\$ 1,075	\$4,837.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/20/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.6	\$ 335	\$536.00
2/20/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	2.5	\$ 1,075	\$2,687.50
2/21/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email message to common interest counsel regarding oral argument scheduled for motion for summary judgment.	0.2	\$ 575	\$115.00
2/21/2019	Stachniak Kaplan, Kayla	Analyze recent reporting; analyze companion case.	1.1	\$ 1,000	\$1,100.00
2/21/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.2	\$ 670	\$1,474.00
2/21/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs.	3.3	\$ 1,075	\$3,547.50
2/22/2019	Baruch, Douglas W.	Call w. team re status and strategy; review related cases and research.	4.1	\$ 1,415	\$5,801.50
2/22/2019	LoPresti, Elizabeth	Correspondence with K. Kaplan regarding new research assignment.	0.2	\$ 575	\$115.00
2/22/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.9	\$ 335	\$301.50
2/22/2019	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; legal research regarding exhaustion of administrative remedies; conference call with J. LoBue, D. Baruch, J. Wollenberg, and K. Grisez; discuss research assignment with E. LoPresti.	2.8	\$ 1,000	\$2,800.00
2/22/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others; discuss potential lawsuit concerning USCIS treatment of uncharacterized discharges.	4.6	\$ 1,075	\$4,945.00
2/23/2019	Wollenberg, Jennifer	Emails with consultants/common interest counsel re MAVNI issues/updates/concerns.	0.4	\$ 1,075	\$430.00
2/25/2019	Baruch, Douglas W.	Address DOJ correspondence and status.	0.5	\$ 1,415	\$707.50
2/25/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; compile all declarations of S. Miller filed in the Nio case; prepare email message to K. St. Romain regarding S. Miller declarations.	1.3	\$ 575	\$747.50
2/25/2019	LoPresti, Elizabeth	Conduct legal research regarding exhaustion requirements in naturalization cases; prepare internal memo on the same.	8.3	\$ 575	\$4,772.50
2/25/2019	Raol, Neaha	Correspondence with class members; review legal articles/reports re: matter.	0.5	\$ 1,000	\$500.00
2/25/2019	St. Romain, Kate	Supplement MAVNI litigation website; email Nio named plaintiffs regarding Court hearing and supplemental reporting; respond to Nio inbox email regarding Miller declarations.	0.6	\$ 825	\$495.00
2/25/2019	Szlarb, Natalia	Respond to Nio class members communications.	4.1	\$ 670	\$2,747.00
2/25/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.5	\$ 1,075	\$3,762.50
2/26/2019	Baruch, Douglas W.	Address DOJ inquiry and strategy.	0.5	\$ 1,415	\$707.50
2/26/2019	Johnson, Sam	Prepare email message to A. Fitzgerald regarding responding to class members; prepare email message to N. Szlarb regarding responding to class member.	0.3	\$ 575	\$172.50
2/26/2019	LoPresti, Elizabeth	Conduct legal research on interpretation of futility; prepare internal memo on the same; correspondence with K. Kaplan and J. Wollenberg.	5.0	\$ 575	\$2,875.00
2/26/2019	Szlarb, Natalia	Respond to Nio class members communications.	3.8	\$ 670	\$2,546.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
2/26/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.3	\$ 1,075	\$4,622.50
2/27/2019	Baruch, Douglas W.	Address matter filed by non-citizen soldier; legal research and strategy.	2.8	\$ 1,415	\$3,962.00
2/27/2019	Szlarb, Natalia	Respond to Nio class members communications.	0.8	\$ 670	\$536.00
2/27/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including communications with MAVNIs and common interest counsel; prepare MAVNI complaint.	5.9	\$ 1,075	\$6,342.50
2/28/2019	Baruch, Douglas W.	Address pleading by non-citizen soldier and strategy; address class member status and strategy.	2.5	\$ 1,415	\$3,537.50
2/28/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.3	\$ 575	\$172.50
2/28/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 335	\$335.00
2/28/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; draft MAVNI complaint.	3.3	\$ 1,075	\$3,547.50
3/1/2019	Baruch, Douglas W.	DOJ correspondence and reviewing status; legal research.	1.8	\$ 1,415	\$2,547.00
3/1/2019	St. Romain, Kate	Edit/review motion for leave to file sur-reply.	1.8	\$ 825	\$1,485.00
3/1/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.4	\$ 670	\$1,608.00
3/1/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and lawyers representing MAVNIs.	1.4	\$ 1,075	\$1,505.00
3/2/2019	Wollenberg, Jennifer	Emails with common interest counsel re MAVNI issues/updates/concerns.	0.2	\$ 1,075	\$215.00
3/3/2019	Wollenberg, Jennifer	Address MAVNI issues/updates concerns; review Nio summary judgment documents.	1.5	\$ 1,075	\$1,612.50
3/4/2019	Baruch, Douglas W.	Prepare for filing; confer with J. Wollenberg; review records; research; address MTS decision.	5.5	\$ 1,415	\$7,782.50
3/4/2019	Johnson, Sam	Attend teleconference with N. Szlarb regarding February 8, 2019 report; prepare email message to N. Szlarb regarding interpreting February 8, 2019 report.	0.2	\$ 575	\$115.00
3/4/2019	Raol, Neaha	Follow-up correspondence / confer with class members; case update.	0.9	\$ 1,000	\$900.00
3/4/2019	Stachniak Kaplan, Kayla	Analyze supposed MAVNI naturalization eligibility issues.	0.4	\$ 1,000	\$400.00
3/4/2019	Szlarb, Natalia	Respond to Nio class members communications.	4.1	\$ 670	\$2,747.00
3/4/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review materials for Friday's supplemental filing in Nio; review common interest privileged draft re MAVNI's individual lawsuit.	4.6	\$ 1,075	\$4,945.00
3/5/2019	Baruch, Douglas W.	Reviewing DOJ materials; reviewing soldier packets; preparing for court submission per order.	5.5	\$ 1,415	\$7,782.50
3/5/2019	Stachniak Kaplan, Kayla	Review legal research regarding exhaustion and policy challenges.	0.8	\$ 1,000	\$800.00
3/5/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.1	\$ 670	\$1,407.00
3/5/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review materials for Friday's supplemental filing in Nio; review common interest privileged draft re MAVNI's individual lawsuit.	5.2	\$ 1,075	\$5,590.00
3/6/2019	Baruch, Douglas W.	Reviewing background materials for court submission; drafting notice; conferring with team.	5.0	\$ 1,415	\$7,075.00
3/6/2019	LoPresti, Elizabeth	Conference with N. Szlarb regarding preparation for Nio inbox meeting.	0.2	\$ 575	\$115.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
3/6/2019	Raol, Neaha	Review press articles re: MAVNI disclosures by DOD/Army.	0.3	\$ 1,000	\$300.00
3/6/2019	Raol, Neaha	Confer with various class members.	0.8	\$ 1,000	\$800.00
3/6/2019	Szlarb, Natalia	Respond to Nio class members communications.	1.8	\$ 670	\$1,206.00
3/6/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; review materials and draft points for Friday's supplemental filing in Nio.	7.6	\$ 1,075	\$8,170.00
3/7/2019	Baruch, Douglas W.	Address strategy; drafting and revising report to court per order.	4.0	\$ 1,415	\$5,660.00
3/7/2019	Stachniak Kaplan, Kayla	Review research regarding exhaustion requirements and policy challenges.	0.3	\$ 1,000	\$300.00
3/7/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.7	\$ 670	\$1,809.00
3/7/2019	Williams, Ronald	Prepare possible exhibits	8.1	\$ 575	\$4,657.50
3/7/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare materials for Friday's supplemental filing in Nio.	15.3	\$ 1,075	\$16,447.50
3/8/2019	Baruch, Douglas W.	Final edits and revisions to status report; review and address DOJ filings.	4.8	\$ 1,415	\$6,792.00
3/8/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 335	\$100.50
3/8/2019	Raol, Neaha	Assist / revise finalize papers and exhibits for court filing; conferences with J. Wollenberg re: same.	4.5	\$ 1,000	\$4,500.00
3/8/2019	St. Romain, Kate	Call and email J. Wollenberg regarding Notice and Production of Documents in Compliance with February 21, 2019 Court Order; finalize exhibits for notice and production of documents.	2.9	\$ 825	\$2,392.50
3/8/2019	Stachniak Kaplan, Kayla	Review supplemental filings.	0.3	\$ 1,000	\$300.00
3/8/2019	Williams, Ronald	Create cover pages for exhibits for Nio court filing for unredacted background check documents; work with InfoSys to access unredacted documents.	2.1	\$ 575	\$1,207.50
3/8/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare materials for today's supplemental filing in Nio.	8.1	\$ 1,075	\$8,707.50
3/11/2019	Baruch, Douglas W.	Address DOJ filings and strategy.	4.0	\$ 1,415	\$5,660.00
3/11/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to N. Szlarb, E. LoPresti, and B. McNamara regarding report filed by the Government on March 8, 2019; prepare email message to common interest counsel regarding information from the March 8, 2019 report.	1.0	\$ 575	\$575.00
3/11/2019	LoPresti, Elizabeth	Prepare litigation binder for next Wednesday's summary judgment hearing; conference with J. Wollenberg regarding materials/prep.	7.8	\$ 575	\$4,485.00
3/11/2019	Raol, Neaha	Confer with Nio class member; confer with FF team re: same and outstanding items.	0.5	\$ 1,000	\$500.00
3/11/2019	St. Romain, Kate	Supplement MAVNI litigation website.	0.3	\$ 825	\$247.50
3/11/2019	Stachniak Kaplan, Kayla	Review legal research regarding policy challenges and exhaustion requirements.	0.5	\$ 1,000	\$500.00
3/11/2019	Szlarb, Natalia	Respond to Nio class members communications.	3.4	\$ 670	\$2,278.00
3/11/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare for upcoming SJ hearing.	5.5	\$ 1,075	\$5,912.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/12/2019	Baruch, Douglas W.	Meeting to prepare for oral argument; review documentation; research re regs; counsel call re class member matter and begin analysis re same.	6.0	\$ 1,415	\$8,490.00
3/12/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to common interest counsel regarding information from the March 8, 2019 report.	0.4	\$ 575	\$230.00
3/12/2019	LoPresti, Elizabeth	Conference with J. Wollenberg and D. Baruch regarding SJ hearing preparation; prepare for SJ hearing.	7.7	\$ 575	\$4,427.50
3/12/2019	McNamara, Brendan	Meet with J. Wollenberg to discuss MAVNI updates and protocol for responding to soldiers.	0.6	\$ 335	\$201.00
3/12/2019	Stachniak Kaplan, Kayla	Analyze legal research on policy challenges and exhaustion requirements; analyze summary judgment reply arguments.	1.3	\$ 1,000	\$1,300.00
3/12/2019	Szlarb, Natalia	Respond to Nio class members communications; conference with Jenny Wollenberg.	3.9	\$ 670	\$2,613.00
3/12/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare for upcoming SJ hearing.	6.5	\$ 1,075	\$6,987.50
3/13/2019	Baruch, Douglas W.	Address new complaint and research re same; hearing preparation.	5.9	\$ 1,415	\$8,348.50
3/13/2019	LoPresti, Elizabeth	Prepare for SJ hearing next Wednesday.	4.8	\$ 575	\$2,760.00
3/13/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.2	\$ 670	\$1,474.00
3/13/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare for upcoming SJ hearing.	7.2	\$ 1,075	\$7,740.00
3/14/2019	Baruch, Douglas W.	Researching/drafting class member litigation; address Court questions.	5.5	\$ 1,415	\$7,782.50
3/14/2019	LoPresti, Elizabeth	Prepare for SJ hearing.	5.1	\$ 575	\$2,932.50
3/14/2019	Raol, Neaha	Confer/correspondence with MAVNIs.	0.2	\$ 1,000	\$200.00
3/14/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.1	\$ 670	\$1,407.00
3/14/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare for upcoming SJ hearing.	5.7	\$ 1,075	\$6,127.50
3/15/2019	Baruch, Douglas W.	Edits and revisions to class member draft pleading and discuss with J. Wollenberg; address responses to Court questions; DOJ correspondence.	6.5	\$ 1,415	\$9,197.50
3/15/2019	Johnson, Sam	Attend teleconference with MAVNI regarding filing N-400 naturalization application; prepare email message to common interest counsel regarding March 8, 2019 report.	0.3	\$ 575	\$172.50
3/15/2019	LoPresti, Elizabeth	Prepare for Wednesday SJ hearing.	2.6	\$ 575	\$1,495.00
3/15/2019	Raol, Neaha	Confer with class members, J. Wollenberg re: report. Review SJ briefs, articles and various internal correspondence.	1.5	\$ 1,000	\$1,500.00
3/15/2019	St. Romain, Kate	Review Defendants' Supplement to Notice of Compliance with Court's February 21, 2019 Order; supplement MAVNI litigation website.	0.2	\$ 825	\$165.00
3/15/2019	Szlarb, Natalia	Respond to Nio class members communications.	4.4	\$ 670	\$2,948.00
3/15/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare for upcoming SJ hearing.	6.5	\$ 1,075	\$6,987.50
3/16/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prep for upcoming SJ hearing.	5.0	\$ 1,075	\$5,375.00
3/17/2019	Baruch, Douglas W.	Address status and MAVNI information from counsel.	0.7	\$ 1,415	\$990.50
3/17/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; prepare for upcoming SJ hearing.	6.3	\$ 1,075	\$6,772.50
3/18/2019	Baruch, Douglas W.	Prepare for hearing.	5.5	\$ 1,415	\$7,782.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
3/18/2019	Johnson, Sam	Attend teleconference with MAVNI regarding filing N-400 naturalization application; review correspondence from common interest counsel regarding Nio class member; prepare email message to M. Kiziltay Carter, N. Szlarb, and B. McNamara regarding military helpline information for MAVNI soldiers.	0.5	\$ 575	\$287.50
3/18/2019	LoPresti, Elizabeth	Prepare for summary judgment hearing.	1.6	\$ 575	\$920.00
3/18/2019	Szlarb, Natalia	Respond to Nio class members communications.	1.8	\$ 670	\$1,206.00
3/18/2019	Wollenberg, Jennifer	Prepare for upcoming SJ hearing; address MAVNI issues/updates/concerns.	10.5	\$ 1,075	\$11,287.50
3/19/2019	Baruch, Douglas W.	Preparing for summary judgment hearing and research re same.	5.5	\$ 1,415	\$7,782.50
3/19/2019	LoPresti, Elizabeth	Prepare for summary judgment hearing; correspondence with J. Wollenberg regarding preparations.	1.8	\$ 575	\$1,035.00
3/19/2019	Raol, Neaha	Correspondence with class members - via phone and email. Confer with team re: same.	0.5	\$ 1,000	\$500.00
3/19/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.7	\$ 670	\$1,809.00
3/19/2019	Wollenberg, Jennifer	Prepare for upcoming SJ hearing; address MAVNI issues/updates/concerns.	10.8	\$ 1,075	\$11,610.00
3/20/2019	Baruch, Douglas W.	Prepare for hearing; chambers conference and hearing; follow up with clients and team.	8.5	\$ 1,415	\$12,027.50
3/20/2019	LoPresti, Elizabeth	Prepare for summary judgment hearing; conference with MAVNI team; attend summary judgment hearing.	7.2	\$ 575	\$4,140.00
3/20/2019	Raol, Neaha	Prep for and attend summary judgment oral argument; confer with various team members and clients/class members before and after oral argument.	7.1	\$ 1,000	\$7,100.00
3/20/2019	Wollenberg, Jennifer	Prepare for upcoming SJ hearing, attend hearing, and follow-up from hearing; address MAVNI issues/updates/concerns.	8.5	\$ 1,075	\$9,137.50
3/21/2019	Baruch, Douglas W.	Address status and follow-on submissions; calls and emails re strategy.	5.7	\$ 1,415	\$8,065.50
3/21/2019	LoPresti, Elizabeth	Correspondence with J. Wollenberg regarding filing additional authorities with the court; review and shepardize cases and send to J. Wollenberg.	1.8	\$ 575	\$1,035.00
3/21/2019	Raol, Neaha	Review case law and prepare follow-up items for court (per court's request); confer with J. Wollenberg re: same; confer with various class members re: status.	3.0	\$ 1,000	\$3,000.00
3/21/2019	Szlarb, Natalia	Respond to Nio class members communications; conference with Jenny Wollenberg.	3.2	\$ 670	\$2,144.00
3/21/2019	Wollenberg, Jennifer	Prepare SJ submission for Court, with exhibits; address MAVNI issues/updates/concerns.	7.9	\$ 1,075	\$8,492.50
3/22/2019	Baruch, Douglas W.	Address status and strategy; DOJ correspondence and submissions to Court.	4.5	\$ 1,415	\$6,367.50
3/22/2019	Raol, Neaha	Confer with various class members re: status/updates.	2.0	\$ 1,000	\$2,000.00
3/22/2019	Szlarb, Natalia	Respond to Nio class members communications; conference with Jenny Wollenberg.	4.3	\$ 670	\$2,881.00
3/22/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including calls with common interest counsel.	2.5	\$ 1,075	\$2,687.50
3/23/2019	Wollenberg, Jennifer	Emails re MAVNI update.	0.2	\$ 1,075	\$215.00
3/24/2019	Baruch, Douglas W.	Review supplemental notice for filings.	0.6	\$ 1,415	\$849.00
3/24/2019	Wollenberg, Jennifer	Prepare filing notice and attachments.	3.4	\$ 1,075	\$3,655.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
3/25/2019	Baruch, Douglas W.	Call with non-citizen soldier counsel and review draft brief; address status and developments.	2.6	\$ 1,415	\$3,679.00
3/25/2019	LoPresti, Elizabeth	Correspondence with J. Wollenberg regarding short assignment, send cases per assignment.	0.2	\$ 575	\$115.00
3/25/2019	Raol, Neaha	Conference with class member; review correspondence and internal follow-up re: same.	0.6	\$ 1,000	\$600.00
3/25/2019	St. Romain, Kate	Edit MAVNI Litigation Website; review Plaintiffs' Notice and Filing of Documents in Compliance with Court Instruction.	0.2	\$ 825	\$165.00
3/25/2019	Szlarb, Natalia	Respond to Nio class members communications.	3.8	\$ 670	\$2,546.00
3/25/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with common interest counsel and review of common interest draft.	6.5	\$ 1,075	\$6,987.50
3/26/2019	Baruch, Douglas W.	Address non-citizen soldier pleading.	1.5	\$ 1,415	\$2,122.50
3/26/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 335	\$100.50
3/26/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.2	\$ 670	\$1,474.00
3/26/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with common interest counsel and review of common interest draft.	5.5	\$ 1,075	\$5,912.50
3/27/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconference with Nio class member regarding N-400 naturalization application process.	0.5	\$ 575	\$287.50
3/27/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.1	\$ 670	\$1,407.00
3/27/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	4.3	\$ 1,075	\$4,622.50
3/28/2019	St. Romain, Kate	Watch MAVNI news piece; email N. Raol, plaintiff and J. Wollenberg regarding MAVNI news piece.	0.4	\$ 825	\$330.00
3/28/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	5.5	\$ 1,075	\$5,912.50
3/29/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to common interest counsel regarding class member situations and other case updates.	0.6	\$ 575	\$345.00
3/29/2019	Raol, Neaha	Review press coverage, articles, etc. re: matter; confer with class members; review update from common interest counsel re: MAVNI issues; follow-up re: discharge research and confer with D. Baruch, J. Wollenberg re: same.	1.3	\$ 1,000	\$1,300.00
3/29/2019	Szlarb, Natalia	Respond to Nio class members communications.	0.9	\$ 670	\$603.00
3/29/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.3	\$ 1,075	\$3,547.50
4/1/2019	Baruch, Douglas W.	Address status and strategy and confer with team.	2.2	\$ 1,415	\$3,113.00
4/1/2019	Raol, Neaha	Confer/correspondence with class members; internal follow-up re: same; review and analyze DOJ reporting on class members.	3.6	\$ 1,000	\$3,600.00
4/1/2019	Szlarb, Natalia	Respond to Nio class members communications.	3.6	\$ 670	\$2,412.00
4/1/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.3	\$ 1,075	\$4,622.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
4/2/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconference with MAVNI regarding filing N-400 naturalization application.	0.2	\$ 575	\$115.00
4/2/2019	Raol, Neaha	Email correspondence with DOJ re: reporting/status of recommended class members; confer with team members re: same; confer with Nio class member.	0.4	\$ 1,000	\$400.00
4/2/2019	Szlarb, Natalia	Respond to Nio class members communications.	2.3	\$ 670	\$1,541.00
4/2/2019	Wollenberg, Jennifer	Address MAVNI issues/concerns/updates.	4.3	\$ 1,075	\$4,622.50
4/3/2019	Baruch, Douglas W.	Review and address Nio status report; correspondence with government; confer with team.	1.5	\$ 1,415	\$2,122.50
4/3/2019	Raol, Neaha	Review DOJ report; confer/correspondence with class members re: status/updates; discuss/prepare material for potential next steps re: non-recommend MAVNIs with drilling issues.	1.5	\$ 1,000	\$1,500.00
4/3/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.8	\$ 1,075	\$5,160.00
4/4/2019	Baruch, Douglas W.	Address DOJ correspondence and strategy.	0.8	\$ 1,415	\$1,132.00
4/4/2019	Raol, Neaha	Confer class member re: status/updates; internal follow-up re: same and class member correspondence.	1.0	\$ 1,000	\$1,000.00
4/4/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	5.5	\$ 1,075	\$5,912.50
4/5/2019	Raol, Neaha	Review SJ hearing transcript; confer/correspondence with class members.	3.1	\$ 1,000	\$3,100.00
4/5/2019	Stuart, Brian C.	Teleconference with J. Wollenberg regarding research re MAVNI related case.	0.2	\$ 770	\$154.00
4/5/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including calls with MAVNIs.	4.7	\$ 1,075	\$5,052.50
4/8/2019	Raol, Neaha	Correspondence with / regarding class members.	1.4	\$ 1,000	\$1,400.00
4/8/2019	Stuart, Brian C.	Research preliminary injunction law in the immigration context re MAVNI related case.	5.7	\$ 770	\$4,389.00
4/8/2019	Szlarb, Natalia	Respond to Nio class members communications.	1.7	\$ 670	\$1,139.00
4/8/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	3.5	\$ 1,075	\$3,762.50
4/9/2019	Baruch, Douglas W.	Address status and strategy.	0.8	\$ 1,415	\$1,132.00
4/9/2019	Stuart, Brian C.	Research preliminary injunction law in the immigration context re MAVNI case.	2.6	\$ 770	\$2,002.00
4/9/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	4.4	\$ 1,075	\$4,730.00
4/10/2019	Stuart, Brian C.	Research preliminary injunction law.	3.5	\$ 770	\$2,695.00
4/10/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	5.1	\$ 1,075	\$5,482.50
4/11/2019	Baruch, Douglas W.	Address status and strategy; correspondence with DOJ; client calls.	2.6	\$ 1,415	\$3,679.00
4/11/2019	Raol, Neaha	Correspondence/confer with class members re: status/various issues.	1.2	\$ 1,000	\$1,200.00
4/11/2019	Stuart, Brian C.	Research preliminary injunction law in the immigration context .	3.9	\$ 770	\$3,003.00
4/11/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns; discuss MAVNI issues with immigration lawyers.	7.5	\$ 1,075	\$8,062.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
4/12/2019	Baruch, Douglas W.	Conference call with counsel re Ohio suit; address status and strategy.	4.4	\$ 1,415	\$6,226.00
4/12/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.6	\$ 335	\$536.00
4/12/2019	Raol, Neaha	Confer with potential / future class member; confer with class member.	1.5	\$ 1,000	\$1,500.00
4/12/2019	Stuart, Brian C.	Research preliminary injunction law.	0.2	\$ 770	\$154.00
4/12/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	4.5	\$ 1,075	\$4,837.50
4/13/2019	Stuart, Brian C.	Research preliminary injunction law in the immigration context for MAVNI case.	6.2	\$ 770	\$4,774.00
4/14/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.0	\$ 335	\$335.00
4/14/2019	Stuart, Brian C.	Research preliminary injunction law for MAVNI case.	7.2	\$ 770	\$5,544.00
4/15/2019	Baruch, Douglas W.	Response to DOJ re status; correspondence with DOJ re soldiers; confer with J. Wollenberg re status/strategy.	1.5	\$ 1,415	\$2,122.50
4/15/2019	McNamara, Brendan	Meet with J. Wollenberg to discuss outstanding items and updates regarding Nio inbox responses; respond to soldiers' emails regarding naturalization.	1.0	\$ 335	\$335.00
4/15/2019	Raol, Neaha	Confer/correspondence with class members; follow-up correspondence/conferences re: same; review Nio inbox correspondence re: specific class members.	4.0	\$ 1,000	\$4,000.00
4/15/2019	St. Romain, Kate	Address declarations and hearing transcripts for common interest counsel litigation; email J. Wollenberg and N. Raol regarding MAVNI news story.	2.4	\$ 825	\$1,980.00
4/15/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	2.8	\$ 1,075	\$3,010.00
4/16/2019	Baruch, Douglas W.	Address status and strategy.	1.5	\$ 1,415	\$2,122.50
4/16/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.3	\$ 335	\$770.50
4/16/2019	Raol, Neaha	Review correspondence with/from class members; confer with J. Wollenberg re: same; correspondence with JAG attorney.	1.8	\$ 1,000	\$1,800.00
4/16/2019	St. Romain, Kate	Materials to common interest counsel; review supplements to MAVNI litigation website; prepare compilation of reporting information for MAVNI soldier and email/call J. Wollenberg regarding the same.	1.4	\$ 825	\$1,155.00
4/16/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.3	\$ 1,075	\$3,547.50
4/17/2019	Baruch, Douglas W.	Address request re reporting obligations; correspondence with DOJ; address Yin indictment.	3.0	\$ 1,415	\$4,245.00
4/17/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.4	\$ 1,075	\$3,655.00
4/18/2019	Raol, Neaha	Review material re: indicted Nio class member/discharged soldier; internal correspondence re: same; confer with class members and follow-up re: same; review correspondence with DOJ and correspondence with court; confer with D. Baruch re: same.	3.5	\$ 1,000	\$3,500.00
4/19/2019	Baruch, Douglas W.	Correspondence with court re reporting obligations.	0.9	\$ 1,415	\$1,273.50
4/19/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	3.6	\$ 335	\$1,206.00
4/19/2019	Raol, Neaha	Confer with various class members; review/confer with D. Baruch re: draft email to court re: reporting; confer with J. Wollenberg re: status/updates; confer with B. McNamara re: class member inquiry/call/follow-up.	2.8	\$ 1,000	\$2,800.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
4/19/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including call with N. Raol; draft email to chambers re Defendants' extension request and discuss same with D. Baruch.	1.5	\$ 1,075	\$1,612.50
4/22/2019	Baruch, Douglas W.	Address class member complaint and PI and confer with common interest counsel re status; legal research.	3.5	\$ 1,415	\$4,952.50
4/22/2019	St. Romain, Kate	Prepare reporting information for MAVNI soldiers and email/call J. Wollenberg regarding the same; email J. Wollenberg regarding documents for common interest counsel; coordinate updates to MAVNI litigation website.	0.9	\$ 825	\$742.50
4/22/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and team members.	9.5	\$ 1,075	\$10,212.50
4/23/2019	Baruch, Douglas W.	Address DOJ correspondence with Court and status; address non-citizen soldier filing.	2.0	\$ 1,415	\$2,830.00
4/23/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.8	\$ 335	\$603.00
4/23/2019	Raol, Neaha	Correspondence with Nio class members re: status, updates, next steps; internal follow-up re: same.	2.8	\$ 1,000	\$2,800.00
4/23/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with common interest counsel, MAVNIs, and team members.	4.9	\$ 1,075	\$5,267.50
4/24/2019	Baruch, Douglas W.	Address class member case; legal research.	2.5	\$ 1,415	\$3,537.50
4/24/2019	Raol, Neaha	Confer with class members and review status of various class members.	1.5	\$ 1,000	\$1,500.00
4/24/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with common interest counsel, MAVNIs, and team members.	4.2	\$ 1,075	\$4,515.00
4/25/2019	Baruch, Douglas W.	Address Iris analysis and prepare memorandum; DOJ correspondence.	1.5	\$ 1,415	\$2,122.50
4/25/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.3	\$ 335	\$435.50
4/25/2019	Raol, Neaha	Confer with potential class member; confer/correspondence with various Nio class members; attend call with immigration counsel re: MAVNI cases status/updates.	3.9	\$ 1,000	\$3,900.00
4/25/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with common interest counsel, MAVNIs, and team members.	4.3	\$ 1,075	\$4,622.50
4/26/2019	Baruch, Douglas W.	Confer re class member matter; address DOJ correspondence.	2.5	\$ 1,415	\$3,537.50
4/26/2019	Raol, Neaha	Correspondence with Nio class member/potential member.	0.6	\$ 1,000	\$600.00
4/26/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and team members.	4.4	\$ 1,075	\$4,730.00
4/29/2019	Baruch, Douglas W.	Address related suit and phone call re same; research.	2.5	\$ 1,415	\$3,537.50
4/29/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 335	\$100.50
4/29/2019	St. Romain, Kate	Telephone conference J. Wollenberg and plaintiff regarding litigation status.	0.8	\$ 825	\$660.00
4/29/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.5	\$ 1,075	\$3,762.50
4/30/2019	Raol, Neaha	Review/revise draft email to government re: class member.	0.2	\$ 1,000	\$200.00
4/30/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	3.4	\$ 1,075	\$3,655.00
5/1/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.3	\$ 335	\$435.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/1/2019	Raol, Neaha	Confer/correspondence with and/or regarding specific class members (status/next steps); revise draft email to DOJ/government.	1.8	\$ 1,000	\$1,800.00
5/1/2019	Stuart, Brian C.	Research preliminary injunction law in the immigration context.	2.1	\$ 770	\$1,617.00
5/1/2019	Wollenberg, Jennifer	Address MAVNI discharges/updates/disputes.	3.4	\$ 1,075	\$3,655.00
5/2/2019	Baruch, Douglas W.	Address non-citizen soldier case update.	0.6	\$ 1,415	\$849.00
5/2/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 335	\$100.50
5/2/2019	Szlarb, Natalia	Review briefs; respond to class member communications.	2.1	\$ 670	\$1,407.00
5/2/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including emails from USCIS re Nio class member inquiries.	0.3	\$ 1,075	\$322.50
5/3/2019	Baruch, Douglas W.	Address non-citizen soldier related matter.	0.7	\$ 1,415	\$990.50
5/3/2019	Szlarb, Natalia	Review briefs; respond to class communications.	2.8	\$ 670	\$1,876.00
5/3/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs.	3.5	\$ 1,075	\$3,762.50
5/5/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including comment on common interest drafts.	2.9	\$ 1,075	\$3,117.50
5/6/2019	Baruch, Douglas W.	Review filings from related matters/individuals' matters.	1.5	\$ 1,415	\$2,122.50
5/6/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.7	\$ 335	\$234.50
5/6/2019	Szlarb, Natalia	Respond to the Nio class counsel communications.	2.8	\$ 670	\$1,876.00
5/6/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including common interest conversations and review of drafts.	4.3	\$ 1,075	\$4,622.50
5/7/2019	Szlarb, Natalia	Respond to Nio Class Communications.	1.1	\$ 670	\$737.00
5/7/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including internal discussions, discussions with MAVNIs, and discussions with others.	3.2	\$ 1,075	\$3,440.00
5/8/2019	Baruch, Douglas W.	Address DOJ submission and strategy.	2.2	\$ 1,415	\$3,113.00
5/8/2019	St. Romain, Kate	Coordinate updates to MAVNI litigation website.	0.4	\$ 825	\$330.00
5/8/2019	Szlarb, Natalia	Respond to Nio Class communications.	3.8	\$ 670	\$2,546.00
5/8/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, common interest counsel, and team members.	4.5	\$ 1,075	\$4,837.50
5/9/2019	Raol, Neaha	Review DOJ updated status reports and analysis re: same; confer/correspondence with class members.	2.2	\$ 1,000	\$2,200.00
5/9/2019	Szlarb, Natalia	Respond to the Nio class communications.	1.3	\$ 670	\$871.00
5/9/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, common interest counsel, and team members.	4.5	\$ 1,075	\$4,837.50
5/10/2019	Baruch, Douglas W.	Address class member matter; phone call re same.	1.5	\$ 1,415	\$2,122.50
5/10/2019	Raol, Neaha	Correspondence with JAG / class member counsel; confer with J. Wollenberg re: same.	0.2	\$ 1,000	\$200.00
5/10/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs, common interest counsel, and team members.	3.2	\$ 1,075	\$3,440.00
5/13/2019	Baruch, Douglas W.	Address legal research and strategy.	3.5	\$ 1,415	\$4,952.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/13/2019	Raol, Neaha	Confer with JAG attorney and J. Wollenberg re: matter, background, status; review MAVNI/class member material.	1.2	\$ 1,000	\$1,200.00
5/13/2019	Stachniak Kaplan, Kayla	Discuss case with D. Baruch, J. Wollenberg, N. Raol, and K. St. Romain.	0.5	\$ 1,000	\$500.00
5/13/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.3	\$ 1,075	\$4,622.50
5/14/2019	Baruch, Douglas W.	Research and address status and strategy.	2.6	\$ 1,415	\$3,679.00
5/14/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	2.5	\$ 1,075	\$2,687.50
5/15/2019	Baruch, Douglas W.	Addressing background materials for class member case and drafting statement.	2.5	\$ 1,415	\$3,537.50
5/15/2019	McNamara, Brendan	Respond to soldiers' email re naturalization.	0.8	\$ 335	\$268.00
5/15/2019	Raol, Neaha	Confer with MAVNIs/class members re: updates, status, next steps; review correspondence / material from class members and respond as needed; review government's recent reporting re: class and strategy re: same/identify potential next steps.	4.8	\$ 1,000	\$4,800.00
5/15/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.3	\$ 1,075	\$4,622.50
5/16/2019	Baruch, Douglas W.	Drafting statement for class member case.	3.5	\$ 1,415	\$4,952.50
5/16/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend conference with B. McNamara regarding responding to Nio class members; prepare email message to J. Wollenberg regarding Nio class member; prepare email messages to common interest counsel regarding Nio class members.	1.2	\$ 575	\$690.00
5/16/2019	McNamara, Brendan	Respond to soldiers' email re naturalization.	1.1	\$ 335	\$368.50
5/16/2019	Raol, Neaha	Review discharge order/material from class member; confer with J. Wollenberg re: same; draft/finalize/send response to soldier re: same, clarification, supporting documentation and next steps; confer with class members; review articles/press material re: MAVNI immigration / naturalization statistics; draft/revise email to govt re: class member inquiry on MSSR status and internal correspondence re: same.	2.2	\$ 1,000	\$2,200.00
5/16/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	3.3	\$ 1,075	\$3,547.50
5/17/2019	Baruch, Douglas W.	Address DHS correspondence; research; address class member statement; confer with J. Wollenberg.	4.4	\$ 1,415	\$6,226.00
5/17/2019	Raol, Neaha	Confer with class members re: status/govt reports; internal correspondence re: revisions to email to government re: particular class member; review updates to govt reporting.	2.3	\$ 1,000	\$2,300.00
5/17/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.2	\$ 1,075	\$4,515.00
5/19/2019	McNamara, Brendan	Respond to soldiers' email re naturalization; draft emails to DOJ and J. Wollenberg.	6.0	\$ 335	\$2,010.00
5/20/2019	Baruch, Douglas W.	Address class member statement; correspondence with DOJ; confer with J. Wollenberg; research.	4.2	\$ 1,415	\$5,943.00
5/20/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.6	\$ 335	\$201.00

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Date	Timekeeper	Narrative	Hours	Rate	Amount
5/20/2019	Raol, Neaha	Correspondence with Nio class member re: status/update and next steps.	0.4	\$ 1,000	\$400.00
5/20/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	5.1	\$ 1,075	\$5,482.50
5/21/2019	Baruch, Douglas W.	Address class member developments and draft statement; address DOJ correspondence.	1.5	\$ 1,415	\$2,122.50
5/21/2019	Johnson, Sam	Prepare email messages to E. LoPresti and B. McNamara regarding Nio inbox; attend teleconference with K. St. Romain, E. LoPresti, and B. McNamara regarding Nio inbox.	0.7	\$ 575	\$402.50
5/21/2019	LoPresti, Elizabeth	Conference with B. McNamara and S. Johnson regarding Nio inbox duties.	0.2	\$ 575	\$115.00
5/21/2019	St. Romain, Kate	Call with S. Johnson, B. McNamara and E. LoPresti regarding management of Nio inbox.	0.2	\$ 825	\$165.00
5/21/2019	Williams, Ronald	Receive instructions from B. McNamara about monitoring the Nio email inbox.	0.4	\$ 575	\$230.00
5/21/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	3.4	\$ 1,075	\$3,655.00
5/22/2019	Baruch, Douglas W.	Address court ruling and respond to inquiries.	2.5	\$ 1,415	\$3,537.50
5/22/2019	Johnson, Sam	Prepare email messages to J. Wollenberg regarding draft exhibits for Nio class member; prepare email messages to B. McNamara regarding preparing draft exhibits for Nio class member; prepare draft exhibits for Nio class member.	0.9	\$ 575	\$517.50
5/22/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.9	\$ 335	\$301.50
5/22/2019	Raol, Neaha	Confer with various class members; confer with B. McNamara re: adverse MSSR waiver for class member and follow-up with D. Baruch, J. Wollenberg re: same and next steps; review court's summary judgment opinion and order; internal correspondence re: same and next steps; correspondence with various counsel for class members and named plaintiffs re: decision/next steps.	3.1	\$ 1,000	\$3,100.00
5/23/2019	Baruch, Douglas W.	Address court order re summary judgment; respond to class member questions.	2.8	\$ 1,415	\$3,962.00
5/23/2019	Raol, Neaha	Internal correspondence re: next steps/status with various team members; conference/correspondence with various Nio class members; confer with common interest counsel, counsel re: adverse MSSR waiver; review court's minute order.	3.8	\$ 1,000	\$3,800.00
5/23/2019	Stachniak Kaplan, Kayla	Review summary judgment decision; discuss case with D. Baruch; discuss case with N. Raol.	0.7	\$ 1,000	\$700.00
5/24/2019	Baruch, Douglas W.	Correspondence with DOJ re class member inquiries.	0.8	\$ 1,415	\$1,132.00
5/24/2019	Raol, Neaha	Confer/correspondence with various class members re: status, next steps; review correspondence from counsel for various class members; internal correspondence with D. Baruch re: same.	4.5	\$ 1,000	\$4,500.00
5/24/2019	St. Romain, Kate	Call with MAVNI soldier regarding summary judgment decision; updates to MAVNI litigation website.	0.9	\$ 825	\$742.50
5/28/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.5	\$ 335	\$837.50
5/28/2019	Raol, Neaha	Confer with Nio class member; internal follow-up re: next steps, etc; review Nio decision and next steps for MAVNIs and confer with J. Wollenberg re: various class members.	1.1	\$ 1,000	\$1,100.00
5/28/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	7.2	\$ 1,075	\$7,740.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
5/29/2019	Baruch, Douglas W.	Address EAJA fee research and analysis.	0.8	\$ 1,415	\$1,132.00
5/29/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.9	\$ 335	\$301.50
5/29/2019	Raol, Neaha	Confer with class members.	0.8	\$ 1,000	\$800.00
5/29/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	5.6	\$ 1,075	\$6,020.00
5/30/2019	Baruch, Douglas W.	Follow-up and strategy discussions re SJ decision.	1.5	\$ 1,415	\$2,122.50
5/30/2019	McNamara, Brendan	Meet with J. Wollenberg and R. Williams; respond to soldiers' emails regarding naturalization;	1.7	\$ 335	\$569.50
5/30/2019	Raol, Neaha	Review MAVNI class member correspondence; follow-up on various items with class members.	0.6	\$ 1,000	\$600.00
5/30/2019	Williams, Ronald	Monitor Nio inbox; respond to MAVNI soldiers' emails.	1.2	\$ 575	\$690.00
5/30/2019	Wollenberg, Jennifer	Address MAVNI issues.	7.2	\$ 1,075	\$7,740.00
5/31/2019	Baruch, Douglas W.	Address EAJA analysis; strategy re joint reports.	1.5	\$ 1,415	\$2,122.50
5/31/2019	Raol, Neaha	Correspondence with M. Carter re: mailbox, soldier inquiry; confer with soldier/class member re: various items, status, case update, next steps; internal correspondence re: particular class members.	2.6	\$ 1,000	\$2,600.00
5/31/2019	St. Romain, Kate	Address MAVNI litigation website updates; email team regarding response to Nio inbox question; email common interest counsel regarding declarations and transcripts.	1.1	\$ 825	\$907.50
5/31/2019	Williams, Ronald	Respond to MAVNI soldiers' emails; monitor Nio inbox.	0.5	\$ 575	\$287.50
5/31/2019	Wollenberg, Jennifer	Address MAVNI issues, including calls with MAVNIs and others.	7.3	\$ 1,075	\$7,847.50
6/3/2019	Baruch, Douglas W.	Address EAJA research and analysis and meetings re same.	1.5	\$ 1,415	\$2,122.50
6/3/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including implementation thoughts.	4.8	\$ 1,075	\$5,160.00
6/4/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.6	\$ 335	\$201.00
6/5/2019	Baruch, Douglas W.	Address developments and joint status report strategy.	2.0	\$ 1,415	\$2,830.00
6/5/2019	Raol, Neaha	Correspondence with class members re: status/updates, next steps.	1.8	\$ 1,000	\$1,800.00
6/6/2019	Baruch, Douglas W.	Call with DOJ; draft proposal and follow-up.	3.5	\$ 1,415	\$4,952.50
6/6/2019	Raol, Neaha	Participate in conference with DOJ, D. Baruch, J. Wollenberg, K. St. Romain re: joint status report; follow-up internal correspondence; confer with Nio class member.	1.9	\$ 1,000	\$1,900.00
6/6/2019	St. Romain, Kate	Meet and confer with defendants' attorneys; meet with J. Wollenberg, J. LoBue, and D. Baruch regarding litigation strategy.	1.7	\$ 825	\$1,402.50
6/7/2019	Baruch, Douglas W.	Proposal to DOJ; conference call with DOJ and follow-up.	2.5	\$ 1,415	\$3,537.50
6/7/2019	Johnson, Sam	Attend teleconference with E. LoPresti and B. McNamara regarding responding to class member questions.	0.2	\$ 575	\$115.00
6/7/2019	LoPresti, Elizabeth	Conference with B. McNamara and S. Johnson regarding Nio inbox duties.	0.2	\$ 575	\$115.00
6/7/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.7	\$ 335	\$234.50
6/7/2019	Raol, Neaha	Class member correspondence; confer with B. McNamara re: same.	1.3	\$ 1,000	\$1,300.00
6/7/2019	Stachniak Kaplan, Kayla	Discuss case with J. Wollenberg; correspondence regarding case resolution.	0.3	\$ 1,000	\$300.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/7/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including next steps.	5.5	\$ 1,075	\$5,912.50
6/10/2019	Baruch, Douglas W.	Call with DOJ re joint status report and begin drafting plaintiffs' proposal.	2.0	\$ 1,415	\$2,830.00
6/10/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.1	\$ 575	\$632.50
6/10/2019	Raol, Neaha	Confer with opposing counsel and internal team re: joint status report; various follow-up items; correspond with class members.	1.2	\$ 1,000	\$1,200.00
6/10/2019	St. Romain, Kate	Telephone conference with defense counsel regarding joint status report.	1.3	\$ 825	\$1,072.50
6/10/2019	Stachniak Kaplan, Kayla	Revise status reports regarding resolution.	0.2	\$ 1,000	\$200.00
6/10/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns.	4.7	\$ 1,075	\$5,052.50
6/11/2019	Baruch, Douglas W.	Finalize implementation proposal for filing; address developments and strategy.	3.5	\$ 1,415	\$4,952.50
6/11/2019	Johnson, Sam	Prepare email messages to B. McNamara and J. Wollenberg regarding responding to class member questions.	0.3	\$ 575	\$172.50
6/11/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.2	\$ 335	\$67.00
6/11/2019	Raol, Neaha	Review edits/comments of other team members to status report for court; review draft status report; internal conferences with other team members re: same; review status report filed by government; correspondence and confer with various class members.	2.9	\$ 1,000	\$2,900.00
6/11/2019	St. Romain, Kate	Edit joint status report; email K. Kaplan, N. Raol, and J. Wollenberg regarding joint status report.	0.8	\$ 825	\$660.00
6/11/2019	Stachniak Kaplan, Kayla	Prepare status report to Court regarding resolution.	0.6	\$ 1,000	\$600.00
6/11/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including planning for next steps.	4.8	\$ 1,075	\$5,160.00
6/12/2019	Raol, Neaha	Internal correspondence; confer with class members.	1.1	\$ 1,000	\$1,100.00
6/12/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including planning re next steps.	5.2	\$ 1,075	\$5,590.00
6/13/2019	Baruch, Douglas W.	Address developments and prepare for hearing.	2.5	\$ 1,415	\$3,537.50
6/13/2019	Raol, Neaha	Confer with class member and review documentation/material; review DOJ status report.	2.1	\$ 1,000	\$2,100.00
6/13/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including planning re next steps given Court's order.	4.9	\$ 1,075	\$5,267.50
6/14/2019	Baruch, Douglas W.	Draft and revise response to defendants' filing re implementation proposal and legal research re same.	2.5	\$ 1,415	\$3,537.50
6/14/2019	Raol, Neaha	Confer with class members/review correspondence re: same.	0.9	\$ 1,000	\$900.00
6/14/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	5.5	\$ 1,075	\$5,912.50
6/15/2019	Baruch, Douglas W.	Edits and revisions to response to Defendants' supplemental notice.	1.5	\$ 1,415	\$2,122.50
6/16/2019	St. Romain, Kate	Email B. McNamara and J. Wollenberg regarding MAVNI Litigation Website updates; prepare updates to Website.	0.8	\$ 825	\$660.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/17/2019	Baruch, Douglas W.	Prepare for court hearing; court hearing on implementation of Court order and follow-up.	6.5	\$ 1,415	\$9,197.50
6/17/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; draft email to DOJ.	1.3	\$ 335	\$435.50
6/17/2019	Raol, Neaha	Confer with class members; prep for and attend hearing; confer with J. Wollenberg re: draft letter and exhibits.	3.5	\$ 1,000	\$3,500.00
6/17/2019	Wollenberg, Jennifer	Prepare for and attend status conference.	4.2	\$ 1,075	\$4,515.00
6/18/2019	Raol, Neaha	Draft/review class cert sur-reply; confer internally re: same; confer with class member and J. Wollenberg and follow-up re: same; revise and prepare exhibits for draft letter re: class member; confer with class members re: hearing/updates.	6.0	\$ 1,000	\$6,000.00
6/18/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues, including discussions with MAVNIs and others.	3.2	\$ 1,075	\$3,440.00
6/19/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.1	\$ 575	\$632.50
6/19/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.6	\$ 335	\$536.00
6/19/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues/questions/concerns.	3.5	\$ 1,075	\$3,762.50
6/20/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to J. Wollenberg regarding scheduling calls with Nio class members; prepare email messages to B. McNamara regarding questions asked by Nio class members; attend teleconference with B. McNamara regarding responding to questions asked by Nio class members.	0.8	\$ 575	\$460.00
6/20/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues, including discussions with MAVNIs and others.	2.5	\$ 1,075	\$2,687.50
6/21/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues, including discussions with MAVNIs and others.	1.9	\$ 1,075	\$2,042.50
6/24/2019	Baruch, Douglas W.	Address status and strategy.	1.0	\$ 1,415	\$1,415.00
6/24/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.2	\$ 335	\$67.00
6/24/2019	Wollenberg, Jennifer	Address MAVNI issues, including letter concerning criminal indictment.	2.9	\$ 1,075	\$3,117.50
6/25/2019	McNamara, Brendan	Respond to soldiers' emails re naturalization.	0.6	\$ 335	\$201.00
6/25/2019	Raol, Neaha	Confer with class members and follow-up internally with K. Grisez, J. Wollenberg re: same; review transcript from previous week's hearing and circulate; review government's latest report on class members.	2.8	\$ 1,000	\$2,800.00
6/25/2019	Wollenberg, Jennifer	Address MAVNI issues/updates/concerns, including discussions with MAVNIs and others.	3.9	\$ 1,075	\$4,192.50
6/26/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
6/26/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.7	\$ 335	\$569.50
6/26/2019	Raol, Neaha	Correspondence with individual class member counsel; correspondence with various class members and follow-up re: same.	0.6	\$ 1,000	\$600.00
6/26/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues.	1.5	\$ 1,075	\$1,612.50
6/27/2019	Baruch, Douglas W.	Correspondence with DOJ re implementation plan and address status and strategy.	2.0	\$ 1,415	\$2,830.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
6/27/2019	Raol, Neaha	Review draft / final letter re: class member; confer with class members re: report, status, next steps.	1.2	\$ 1,000	\$1,200.00
6/27/2019	Wollenberg, Jennifer	Address MAVNI N-400 and related issues, including letter re criminal indictment of MAVNI.	3.8	\$ 1,075	\$4,085.00
6/28/2019	LoPresti, Elizabeth	Conference with J. Wollenberg regarding declaration assignment.	0.7	\$ 575	\$402.50
6/28/2019	Raol, Neaha	Confer and follow-up with various class members re: status, next steps, etc.; review court's opinion in similar case and Nio discussions; confer with J. Wollenberg re: same.	3.4	\$ 1,000	\$3,400.00
6/28/2019	Wollenberg, Jennifer	Address MAVNI N-400 issues/updates/concerns, including discussions with MAVNIs and others.	3.6	\$ 1,075	\$3,870.00
6/29/2019	LoPresti, Elizabeth	Prepare draft declaration of MAVNI.	3.0	\$ 575	\$1,725.00
6/30/2019	LoPresti, Elizabeth	Review information and prepare draft declaration of MAVNI.	1.1	\$ 575	\$632.50
7/1/2019	Baruch, Douglas W.	Address status and strategy.	1.5	\$ 1,415	\$2,122.50
7/1/2019	Raol, Neaha	Correspondence re: two class members' individual counsel; provide related material/status; confer/follow-up re: nio class members; review reporting from DOJ.	1.1	\$ 1,000	\$1,100.00
7/1/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues, including communications with MAVNIs and others.	3.8	\$ 1,075	\$4,085.00
7/2/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.6	\$ 575	\$345.00
7/2/2019	LoPresti, Elizabeth	Conference with J. Wollenberg regarding MAVNI declaration.	1.3	\$ 575	\$747.50
7/2/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.3	\$ 335	\$435.50
7/2/2019	Raol, Neaha	Confer with numerous class members re: status, responses and next steps; internal follow-up re: same and review material from class members.	4.1	\$ 1,000	\$4,100.00
7/2/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues, including communications with MAVNIs and others.	4.3	\$ 1,075	\$4,622.50
7/3/2019	Baruch, Douglas W.	Address status and strategy and supplemental notice.	1.5	\$ 1,415	\$2,122.50
7/3/2019	Raol, Neaha	Review of documents from class members; follow-up correspondence re: same.	1.4	\$ 1,000	\$1,400.00
7/3/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues, including communication with MAVNIs and others and drafting of Notice in Nio.	4.7	\$ 1,075	\$5,052.50
7/4/2019	Raol, Neaha	Review/revise draft implementation notice; correspondence with J. Wollenberg re: same.	0.5	\$ 1,000	\$500.00
7/4/2019	Stachniak Kaplan, Kayla	Prepare Notice regarding closure procedures.	0.2	\$ 1,000	\$200.00
7/4/2019	Wollenberg, Jennifer	Work on Notice for Nio.	0.8	\$ 1,075	\$860.00
7/5/2019	Baruch, Douglas W.	Supplemental notice re MSSR proposal.	1.0	\$ 1,415	\$1,415.00
7/5/2019	Wollenberg, Jennifer	Finalize Nio notice for filing.	1.2	\$ 1,075	\$1,290.00
7/6/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	1.3	\$ 575	\$747.50

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/8/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.7	\$ 335	\$234.50
7/8/2019	Raol, Neaha	Correspondence with class members; review material from class members and follow-up re: same; correspondence with common interest counsel re: individual client status/info.	0.5	\$ 1,000	\$500.00
7/8/2019	Wollenberg, Jennifer	Address MAVNI naturalization issues.	1.5	\$ 1,075	\$1,612.50
7/9/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
7/9/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.2	\$ 335	\$737.00
7/10/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.9	\$ 335	\$971.50
7/10/2019	Raol, Neaha	Confer internally and with clients.	2.9	\$ 1,000	\$2,900.00
7/11/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	3.0	\$ 335	\$1,005.00
7/11/2019	Raol, Neaha	Confer with class members; follow-up email re: same; review DOJ filing re: MSSR notices, dates, and information from clients; internal correspondence re: same.	2.1	\$ 1,000	\$2,100.00
7/11/2019	Stachniak Kaplan, Kayla	Analyze government status reports.	0.3	\$ 1,000	\$300.00
7/15/2019	Baruch, Douglas W.	Prepare for and attend hearing.	4.0	\$ 1,415	\$5,660.00
7/15/2019	LoPresti, Elizabeth	Prepare declaration.	2.7	\$ 575	\$1,552.50
7/15/2019	Raol, Neaha	Prep for and attend hearing; confer with clients/class members and internally re: same.	4.0	\$ 1,000	\$4,000.00
7/15/2019	Stachniak Kaplan, Kayla	Prepare for and attend Status Conference; discuss case with D. Baruch, J. Wollenberg, and N. Raol; meet with MAVNI hearing attendees.	3.4	\$ 1,000	\$3,400.00
7/16/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.4	\$ 335	\$134.00
7/16/2019	Raol, Neaha	Confer with class members.	3.0	\$ 1,000	\$3,000.00
7/17/2019	Raol, Neaha	Confer with class members; internal follow-up re: same.	0.6	\$ 1,000	\$600.00
7/18/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.7	\$ 335	\$569.50
7/18/2019	Raol, Neaha	Confer/correspondence with class members; review and provide updates / internal correspondence re: next steps, last hearing; review government's latest reports.	4.3	\$ 1,000	\$4,300.00
7/19/2019	Raol, Neaha	Confer with various class members.	0.6	\$ 1,000	\$600.00
7/20/2019	McNamara, Brendan	Prepare MAVNI list for J. Wollenberg.	0.7	\$ 335	\$234.50
7/22/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend conference with B. McNamara regarding responding to Nio class members and coordinating work assignments within team.	0.9	\$ 575	\$517.50
7/22/2019	Raol, Neaha	Confer with B. McNamara re: individual class member questions and follow-up items; review next steps, confer internally re: same; confer with various class members.	2.4	\$ 1,000	\$2,400.00
7/23/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and related issues.	1.2	\$ 335	\$402.00
7/23/2019	Raol, Neaha	Confer with B. McNamara re: various class member responses.	1.4	\$ 1,000	\$1,400.00
7/24/2019	Raol, Neaha	Various internal correspondence re: next steps - for class members, website update, and Government response guidance.	0.4	\$ 1,000	\$400.00

Date	Timekeeper	Narrative	Hours	Rate	Amount
7/25/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
7/25/2019	Raol, Neaha	Confer with various class members; calls with B. McNamara and class members.	0.9	\$ 1,000	\$900.00
7/26/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend teleconferences with Nio class member; attend teleconference with B. McNamara regarding responding to Nio class member.	0.5	\$ 575	\$287.50
7/26/2019	McNamara, Brendan	Respond to soldiers' emails regarding issues related to naturalization.	2.6	\$ 335	\$871.00
7/26/2019	Raol, Neaha	Confer with various class members; followup re: same internally.	2.3	\$ 1,000	\$2,300.00
7/29/2019	McNamara, Brendan	Restructure content on MAVNI federal class action website; respond to soldiers' emails regarding naturalization.	3.1	\$ 335	\$1,038.50
7/29/2019	Raol, Neaha	Confer with B. McNamara, various class members re: guidance, website, new counsel info.	0.5	\$ 1,000	\$500.00
7/30/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; research status of several soldiers and draft email to N. Raol and J. Wollenberg.	2.4	\$ 335	\$804.00
7/30/2019	Raol, Neaha	Confer with various class members re: next steps, guidance, etc.	0.9	\$ 1,000	\$900.00
7/31/2019	McNamara, Brendan	Review Government reports and compile analysis of certain soldiers for N. Raol and J. Wollenberg.	1.6	\$ 335	\$536.00
8/1/2019	Raol, Neaha	Confer with various class members re: status.	0.5	\$ 1,000	\$500.00
8/2/2019	Raol, Neaha	Confer with J. DeSantis, J. Wollenberg, class members; review DD214 issue.	1.0	\$ 1,000	\$1,000.00
8/7/2019	McNamara, Brendan	Respond to soldiers' emails regarding Army service and naturalization.	0.5	\$ 335	\$167.50
8/8/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
8/8/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization and related issues.	0.5	\$ 335	\$167.50
8/9/2019	McNamara, Brendan	Discuss soldiers' status with N. Raol; respond to soldiers' emails regarding naturalization.	1.2	\$ 335	\$402.00
8/11/2019	McNamara, Brendan	Review transcripts for comments about deporting soldiers.	0.5	\$ 335	\$167.50
8/13/2019	McNamara, Brendan	Respond to soldiers' emails regarding adverse MSSR notices and naturalization.	0.5	\$ 335	\$167.50
8/19/2019	McNamara, Brendan	Respond to soldiers' emails regarding questions concerning naturalization.	0.9	\$ 335	\$301.50
8/22/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.4	\$ 335	\$804.00
8/23/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.8	\$ 335	\$603.00
8/26/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.5	\$ 335	\$837.50
8/28/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.3	\$ 335	\$100.50
8/29/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 575	\$115.00
8/30/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	0.7	\$ 335	\$234.50
9/3/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization; discuss website updates with J. Wollenberg.	1.5	\$ 335	\$502.50
9/4/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	2.3	\$ 335	\$770.50

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Date	Timekeeper	Narrative	Hours	Rate	Amount
9/6/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.1	\$ 335	\$368.50
9/9/2019	Johnson, Sam	Attend conference with B. McNamara regarding status of the case.	0.4	\$ 670	\$268.00
9/9/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.2	\$ 335	\$402.00
9/10/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	4.8	\$ 335	\$1,608.00
9/19/2019	McNamara, Brendan	Respond to soldiers' email regarding naturalization.	0.6	\$ 335	\$201.00
9/24/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to B. McNamara regarding Nio class member questions.	0.2	\$ 670	\$134.00
9/30/2019	McNamara, Brendan	Respond to soldiers' emails regarding naturalization.	1.9	\$ 335	\$636.50
10/30/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions.	0.2	\$ 670	\$134.00
11/4/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; prepare email messages to B. McNamara regarding responding to class member questions.	1.1	\$ 670	\$737.00
11/5/2019	Johnson, Sam	Prepare email messages to Nio class members responding to class member questions; attend conference with B. McNamara.	0.4	\$ 670	\$268.00
			12761.4		\$11,506,869.00