

Honorable Lauren King

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

N.D., et al.,

Plaintiffs,

v.

CHRIS REYKDAL, et al,

Defendant

Case No.: 2:22-cv-01621-LK

PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES

Counsel for the Plaintiffs and Class, Susman Godfrey LLP and Cedar Law PLLC (“class counsel”) respectfully submit this Motion for Attorneys’ Fees and Costs, consistent with this Court’s Amended Order Granting Plaintiffs’ Motion to Certify Class and for Preliminary Approval of the Class Action Settlement. Dkt #95. As noted in that Order, as part of the provisionally approved Settlement Agreement “OSPI has agreed to pay ‘all of Plaintiffs’ reasonable attorney’s fees and costs incurred in this action through the entry of the settlement decree by the Court.” As such, Plaintiffs submit this memorandum of authorities and contemporaneous billing records in support of their motion. Plaintiffs seek **\$448,478** in fees and costs for all work performed.

BACKGROUND

1 This litigation arose from the efforts of T.D., the mother of N.D., to ensure her
2 son was able to access the Free Appropriate Public Education (“FAPE”) he was entitled under
3 the Individuals with Disabilities Education Act (“IDEA”) in light of the Ninth Circuit’s
4 decision in *E.R.K. v. Hawaii*, 728 F.3d 982 (9th Cir. 2013). In May of 2022 Cedar Law reached
5 out to OSPI through the Attorney General’s Office seeking their support in issuing emergency
6 rules to align Washington’s practice of exiting special education students with the federal
7 requirements – namely once a student turns twenty-two, rather than at the end of the school
8 year in which they turn twenty-one. *See* Dkt #35-5 at 9. Those efforts were ultimately
9 unsuccessful, and this litigation followed. Dkt #1. Both Cedar Law PLLC and Susman Godfrey
10 agreed to take this litigation on under a “fee-shifting” arrangement consistent with the IDEA’s
11 award of attorneys’ fees to prevailing parents. 20 U.S.C. § 1415(3)(B). *Declaration of Lara*
12 *Hruska* ¶ 3.

15 After amending the operative complaint to include E.A., a student who was then
16 currently eligible for special education in the Selah School District (Dkt. #27), Plaintiffs filed
17 for provisional class certification and a preliminary injunction, which was opposed by OSPI.
18 (Dkts #35, 36 and 42). This Court denied the preliminary injunction (Dkt. #58) and although
19 it “thoroughly reconsidered its decision” this Court “ultimately reache[d] the same result” after
20 Plaintiffs filed a Motion for Reconsideration. Dkts. #60 and 72. Contemporaneously, both
21 Plaintiffs and Defendants engaged in extensive discovery, discovery motions practice, and
22 Plaintiffs filed for Class Certification consistent with the Court’s Scheduling Order. *See* Dkts.
23 # 17, 26, and 45.

1 Plaintiffs appealed the denied preliminary injunction. In May of 2024, the Ninth
2 Circuit issued *N.D. v. Reykdal*, 102 F.4th 982 (9th Cir., 2024), concluding that “the students
3 have a high likelihood of success on the merits of their claim... students will indeed be
4 irreparably harmed by the denial of access to special education... [and] both the balance of
5 hardships tips in the student’s favor and also that an injunction would be in the public interest.”
6 *Id.* at 994-995. The Ninth Circuit ordered that a preliminary injunction be issued and that this
7 Court address the issue of provisional certification on remand. *Id.* at 996. The Ninth Circuit
8 also “transfer[red] the consideration of attorney’s fees incurred by Appellants on appeal to the
9 district court from which the parties’ appeal was taken.” Dkt. #80.

12 As noted in the Joint Status Report submitted following remand, “the parties
13 agree that the Ninth Circuit’s opinion effectively resolves the merits of the case in favor of
14 Plaintiffs.” Dkt. 81 at 2. Parties then began back and forth settlement negotiations and had
15 planned to engage in mediation (Dkt. #82) but reached an agreement prior to the mediation
16 date. Specifically, Defendants proffered an Offer of Judgment pursuant to Rule 68 and 20
17 U.S.C. § 1415(i)(3)(D) on July 3, 2024. Following further negotiations after this Court granted
18 provisional certification (Dkt. #83), parties reached an agreement on July 18, 2024.

20 Plaintiffs then filed for Preliminary Approval of the Settlement Agreement,
21 which was denied. Dkt # 86 and 87. Following the denial, and consistent with the Court’s
22 concerns about notice, Plaintiffs developed a more robust notification scheme to ensure class
23 members received notice of the agreement and submitted a second motion. Due to errors by
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1 Plaintiffs’ counsel, that second motion was also denied. Dkt #91.¹ Once those errors were
2 corrected, and an updated settlement agreement was provided, the Court granted preliminary
3 approval of the settlement agreement, including the award of fees sought in this Motion. Dkt
4 #95.

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6 **III. ARGUMENT AND AUTHORITY**

7 IDEA provides that a court has discretion to award reasonable attorney fees to a
8 disabled child’s parents when parents are a “prevailing party” in a legal action against a local
9 educational agency. 20 USC 1415(i)(3)(B)(i); 34 CFR 300.517 (a)(1). To be a prevailing part,
10 a party must demonstrate an order created “a material alternation of the legal relationship of the
11 parties.” *V.S. v. Los Gatos-Saratoga Joint Union High School*, 484 F.3d 1230, 1233 (9th Cir.
12 2007) (citation omitted). Accordingly, even absent the agreement by OSPI to pay “all
13 reasonable fees,” Plaintiffs would be entitled to reasonable attorney fees and costs for this action,
14 the appeal, and the work on remand, including the preparation and filing of this Motion.

15
16 The United States Supreme Court observed in *Hensley v. Eckherhart*, “a prevailing
17 plaintiff should ordinarily recovery attorney’s fees unless special circumstances would render
18 such an award unjust under a statute intended ‘to ensure effective access to the judicial process
19 for person with civil rights grievances.’” *Hensley*, 461 US 424, 429, 103 S.Ct. 1933, 76 L.Ed.2d
20 240 (1983) (discussing 42 U.S.C. § 1988). In determining reasonable attorney’s fees, courts
21 utilize the two-step “lodestar” method. *See Morales v. City of San Rafael*, 96 F. 3d 359, 363-

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¹ As noted in the Court’s order, Plaintiffs are not seeking fees for counsels’ work on their Third Motion for Preliminary Approval.

1 65 & nn. 8-12 (9th Cir 1996). The “lodestar” is calculated by multiplying the number of hours
2 the prevailing party reasonably expended on the litigation by a reasonable hourly rate. *See*
3 *McGrath v. County of Nevada*, 67 F.3d248, 252 (9th Cir. 1995). The reasonableness of an hourly
4 rate is determined by the prevailing market rates in the relevant community for similar work.
5 *See Blum v. Stenson*, 465 U.S. 886, 895, n. 11 (1984). District courts may use their own
6 knowledge of customary rates and their experience concerning reasonable and proper fees.
7 *Ingram v. Oroudjian*, 647 F.3d 925, 928 (9th Cir. 2011)).

8
9 On rare occasions a court may adjust the lodestar figure, but the lodestar figure is the
10 “presumptively accurate measure of reasonable fees.” *Ballen v. City of Redmond*, 466 F.3d 736,
11 746 (9th Cir. 2006). On the rare occasion an adjustment is appropriate, it is made in
12 consideration of the factors referenced in *Kerr v. Screen Extras Guild, Inc.* 526 F.2nd 67, 70
13 (9th Cir. 1975). “A district court should not, however, prophylactically apply the *Kerr* factors
14 in every case.” *Abrams v. Sequim Asset Solutions, LLC*, 2023 WL 2757195 at 3 (W.D. Wash.,
15 March 2023) (citing *Cairns v. Franklin Mint. Co.*, 292 F.3d 1139, 1158 (9th Cir. 2002)). As this
16 Court explained “[i]n sum, the lodestar figure ‘includes most, if not all, of the relevant factors
17 constituting a reasonable attorney's fee,’ and a departure from that figure is permitted ‘only in
18 certain rare and exceptional cases, supported by both specific evidence on the record and
19 detailed findings[.]’” *Id.* Plaintiffs are not seeking an adjustment of fees based on the *Kerr*
20 factors.
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24 “The most critical factor in determining the reasonableness of a fee award is ‘the degree
25 of success obtained.’” *Farrar v. Hobby*, 506 US 103, 1111 (1992) (quoting *Hensley v. Eckerhart*,
26 461 US 424, 436 (1983)). “Where a plaintiff has obtained excellent results, his attorney should
27

1 receive a fully compensatory fee.” *Hensley*, 461 U.S. at 435. Moreover, “a plaintiff may obtain
2 excellent results without obtaining all of the relief he requested.” *Id.*, at 424 n. 11. The result
3 obtained by Plaintiffs in this matter is nothing short of significant and substantial. Plaintiffs
4 obtained permanent change to the law in Washington, mechanisms for students and former
5 students to access compensatory education owed to them, and a published Ninth Circuit opinion
6 that not only expanded access to special education for students – up to an additional year for
7 some students – but also clarified the standard for issuing a preliminary injunction when a
8 student is being denied access to special education.
9

10 Over the course of the litigation, attorneys and paralegals at Cedar Law completed 523.7
11 hours of work, amounting to \$198,570 at billable rates of \$500 for Ms. Hruska, \$400 for Mr.
12 Hagel, and \$200 for Ms. Leifur-Masterson. *See Hruska Decl.*, ¶ 6, and Exhibit 1. Cedar Law
13 also incurred costs of \$450 (represented on the 10th to last line in the attached spreadsheet)
14 accessing court records for research purposes. And as noted above, work on the third motion
15 for preliminary approval (as well as work on a recent due process hearing request intended to
16 preserve the statute of limitations for N.D., billed in this matter for convenience) are not
17 included in the fee request.
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19 Similarly, Ian Crosby and his team at Susman Godfrey completed 298.5 hours of work,
20 amounting to \$245,067 encompassing Mr. Crosby’s s rate of \$850, which increased to \$950 at
21 the start of 2024. *See Declaration of Ian Crosby.*, ¶ 13, Exhibit 1. Susman Godfrey incurred a
22 total of \$4,391 in costs associated with the matter as well. *Id.*
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1 Plaintiffs estimate that responding to any concerns expressed by class members, as well
2 as attendance at the Final Approval hearing could incur no more than an additional \$10,000 in
3 fees. Plaintiffs will have a final number for the Court at that hearing.

4 All told, Plaintiffs request **\$448,478** plus any work necessary to respond to class member
5 disagreements.

6
7 **1) Reasonable Rate**

8 This case was handled primarily by three attorneys² – Ian Crosby of Susman Godfrey,
9 and Lara Hruska and Alex Hagel of Cedar Law PLLC. The team also includes Kaitlin Leifur-
10 Masterson, who was a paralegal the majority of the time, but is now a licensed attorney, having
11 completed Washington’s APR 6 program and passed the Washington Bar in September of 2024.

12
13 Ms. Hruska and Mr. Hagel’s rates are reasonable and commensurate with other civil
14 rights and special education attorneys in Washington. As previously indicated, Ms. Hruska
15 founded Cedar Law in 2015 and is Cedar’s Managing Partner. Dkt. #35-5 at 4. Prior to founding
16 Cedar, Ms. Hruska represented school districts around Washington, providing both general
17 counsel advice and state and federal litigation. *Id.* Most of her work – and Cedar’s in general –
18 focuses on student educational rights, including special education services under the IDEA. *Id.*
19 Mr. Hagel is Cedar’s newest partner, having been promoted from senior associate at the start of
20 this year. *Hruska Decl.* ¶ 11. Mr. Hagel graduated from the University of Washington School
21 of Law in 2019 and started at Cedar that same year. *Id.* ¶ 12. Prior to law school, both Ms.
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26 ² Notably, T.D., who is herself an attorney, contributed significant comments, edits, and suggestions on every
27 filing submitted in this case (as did E.A.’s family) – which reduced the amount of time necessary for other
attorneys to devote to these matters. However, Plaintiffs are not seeking reimbursement for her time and efforts.

1 Hruska and Mr. Hagel served as teachers, where both had significant experience supporting
2 special education students. *Id.* ¶¶ 9 and 13.

3 The reasonableness of fees for special education attorneys was recently discussed by the
4 Western District of Washington in *S.H. v. Issaquah School District*, 2:21-cv-00137-DGE, 2023
5 WL 3011732 (March 2023). In that case, Attorney Ryan Ford (then a solo practitioner, now
6 also a partner at Cedar Law) submitted two declarations by colleagues in Washington – Kerri
7 Feeney and Nicholle Mineiro. Ms. Feeney’s declaration, submitted in October of 2022, stated
8 “I am generally familiar with the hourly rates of other education and special education law
9 practitioners in the state of Washington who represent families. The majority bill from \$275 to
10 \$450 per hour.” *See S.H.*, 2:21-cv-00137-DGE, 2023 WL 3011732 (Dkt #45 at 88). Similarly,
11 Ms. Mineiro stated also stated that in October of 2022 “special education attorneys in the Seattle
12 area generally charge between \$250-\$400 per hour” and that her rate was \$375 per hour. *Id.* at
13 98. The fees Ms. Hruska and Mr. Hagel are consistent with the general practice of special
14 education attorneys – although on the higher side. But their prior experience in education, where
15 both were teachers with firsthand knowledge of special education was and is crucial to their
16 ability to serve their clients, justifies the higher rate (see *Declaration of Lara Hruska*, Dkt. #35-
17 5).

18 Although not related to Washington directly, the Oregon State Bar Association’s semi-
19 annual Economic Survey, relying on data from 2021, provides similar values for “private
20 practice” attorneys based on the number of years as a licensed attorney. *See Hruska Decl.* ¶ 15
21 at Exhibit 2. It is Cedar’s experience that the rates charged in Downtown Portland (one of the
22 economic areas identified in the survey) are comparatively lower than those rates in Seattle,
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1 where Cedar’s office is located. *Hruska Decl.* ¶ 15. Mr. Hagel, having passed the bar in 2019,
2 falls within the 4–6-year range – which shows the 95th percentile at \$495 an hour, while Ms.
3 Hruska, who falls within the 10-12 years shows the 95th percentile at \$567 an hour. Thus, both
4 of their rates fall below the rates established in Portland in 2021. *Id.*

5
6 Ms. Leifur-Masterson’s rate of \$200 an hour is also reasonable. A case from 2021 cited
7 with approval the proposition that “a range of reasonable paralegal rates, [are] from \$145 to
8 \$240.” *Black Lives Matter Seattle-King County v. City of Seattle, Seattle Police Department*,
9 516 F. Supp. 3d 1202 at 1213 (citing *Stewart v. Snohomish County Public Utility District No.*
10 *I*, No. C16-0020-JCC, 2017 WL 4538956, at *1 (W.D. Wash. Oct. 11, 2017). As noted above,
11 Ms. Leifur-Masterson was completing the Washington Admission and Practice Rules 6 program
12 while working on this matter, and has since become a licensed attorney. *Hruska Decl.* ¶ 14. Ms.
13 Leifur-Masterson’s experience warrants the \$200 rate.

14
15 Mr. Crosby’s rates are also reasonable given his prominence and experience as lead
16 counsel in high-profile cases and his specific expertise in the fields of class action and appellate
17 litigation. Mr. Crosby has long been recognized as among the “Best Lawyers in America” by
18 *U.S. News and World Report* and was recently honored to be the only attorney named among
19 “the nation’s most powerful people in artificial intelligence” on *Business Insider’s* “2024 AI
20 Power List.” *Crosby Decl.* ¶ 12.

21
22 Mr. Crosby regularly serves as lead counsel for major public companies in “bet the
23 company” litigation and matters of public importance. He is currently lead counsel for *The New*
24 *York Times* in its highly-watched lawsuit against OpenAI and Microsoft regarding the use of
25 copyrighted works scraped from the Internet to train and operate generative AI models. *Id.* ¶ 3.
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1 Locally, he is lead counsel for Zillow Group in defense a lawsuit by IBM asserting infringement
2 of seven patents that is currently pending before Judge Zilly. *Id.* ¶ 4. He has served as lead
3 counsel for Zillow in other concluded matters in the Western District of Washington. *Id.* He has
4 also served as lead counsel for Seattle Children’s Hospital in King County Superior Court, and
5 represented Perkins Coie in defending depositions of former employees in response to third-
6 party subpoenas. *Id.* ¶ 5.

8 Mr. Crosby also has significant experience in class action litigation. He most recently
9 presented plaintiffs’ damages expert at trial in the *NFL Sunday Ticket* antitrust lawsuit, in which
10 the jury awarded a \$4.6 billion dollar verdict, which is now on appeal. *Id.* ¶ 7. He is currently
11 counsel in the recently settled *Google Incognito* and in the pending *Google Firebase* class action
12 lawsuits. *Id.* Mr. Crosby’s appellate experience includes multiple arguments before the United
13 States Courts of Appeals for the Ninth and Federal Circuits. *Id.* ¶ 6.

15 Susman Godfrey has a national litigation practice, and sets its published hourly rates,
16 including Mr. Crosby’s, accordingly. *Id.* ¶ 8. Mr. Crosby’s rates of \$850 to \$950 per hour are
17 commensurate with recognized national benchmarks such as the *Fitzpatrick Matrix* (\$831/hr.)
18 and the *Laffey Matrix* (\$1,141/hr.) for lawyers of his seniority and experience. *Id.* ¶ 9. Susman
19 Godfrey’s published hourly rates have been accepted or deemed reasonable in multiple class
20 action lawsuits throughout the country. *Id.* ¶ 9. Susman Godfrey has never discounted Mr.
21 Crosby’s or any of its lawyer’s national published hourly rates in any of Mr. Crosby’s multiple
22 matters for local clients. *Id.* ¶¶ 10-11.

25 2) Hours Reasonably Expended

1 “The number of hours to be compensated is calculated by considering whether, in light
2 of the circumstances, the time could reasonably have been billed to a private client.” *Moreno v.*
3 *City of Sacramento*, 534 F.3d 1106, 1111 (9th Cir. 2008). The Ninth Circuit would go on to
4 explain “it must also be kept in mind that lawyers are not likely to spend unnecessary time on
5 contingency fee cases in the hope of inflating their fees. The payoff is too uncertain, as to both
6 the result and the amount of the fee. It would therefore be the highly atypical civil rights case
7 where plaintiff’s lawyer engages in churning. By and large, the court should defer to the winning
8 lawyer’s professional judgment as to how much time he was required to spend on the case; after
9 all, he won, and might not have, had he been more of a slacker.” *Id.* at 1112.

12 The billing records submitted in this case shows that Plaintiffs’ counsel has, at every
13 step, attempted to quickly resolve this issue with OSPI. Starting in 2022, T.D. and Cedar sought
14 to work with OSPI to issue emergency rules and pressure the Legislature to bring RCW 392-
15 172A-02000(2)(c) into line with the federal requirements, consistent with *E.R.K.* Dkt. 35-5 at
16 8. Only once that effort failed did we seek litigation. Both Cedar Law and Susman Godfrey took
17 this matter on a fee-shifting basis. *Hruska Decl.* ¶ 3. The number of hours billed by Cedar Law
18 and Susman Godfrey encompasses over two years of litigation, several major motions –
19 including a motion to amend the complaint, motion to compel, motion for provisional
20 certification and preliminary injunction, motion for reconsideration, motions for approval of the
21 settlement, and a motion for class certification which was ultimately rendered moot by the
22 settlement – and an appeal. Plaintiffs were ultimately successful on every motion filed (with the
23 glaring exception of the second motion for class certification). Additionally, Plaintiffs engaged
24 in extensive discovery, both as it related to the named plaintiffs’ special education needs and
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1 regarding Washington’s provision of education to non-disabled students through the HS+ and
2 GED programs. The timely completion of the work necessary in this case was possible because
3 of the multiple team meetings held on this matter, during which both named plaintiffs’ families
4 participated fully.
5

6 Plaintiffs’ successful appeal to the Ninth Circuit, which included multiple rounds of
7 briefing and motions to expedite consideration of the appeal, was essential in resolving this case
8 at this point. Plaintiffs were especially careful to avoid duplication of work given the short turn-
9 around on many of the appellate briefs. Plaintiffs generally split the work with Mr. Crosby
10 generally handling class certification issues, and Mr. Hagel and Ms. Hruska generally handling
11 the merits portions – although inevitable overlap occurred, especially on edits and rewrites.
12 *Hruska Decl.* ¶ 16.
13

14 The billing records show that counsel was diligent with their time, and at every step
15 working to complete this litigation and benefit the class. Plaintiffs should be awarded their fully
16 requested amount of **\$448,478**.
17

18 IV. CONCLUSION

19 Plaintiffs obtained nearly complete relief in this matter. Their attorney’s fees are
20 reasonable, and they respectfully request this Court to award the full sum of attorney’s fees
21 requested.
22

23
24 Respectfully submitted this 6th Day of January, 2025.

25
26 By: /s/ Ian B. Crosby
27 Ian B. Crosby, WSBA 28461
icrosby@susmangodfrey.com

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Attorneys for Plaintiffs

CERTIFICATE OF COMPLIANCE

I certify that this reply contains 3197 words, in compliance with the Local Civil Rules.

/s/ Ian B. Crosby
Ian B. Crosby, WSBA 28461

CERTIFICATE OF SERVICE

I hereby certify that on this day I caused the foregoing document to be served,
via electronic mail, per agreement, on the following:

BRIAN ROWE, WSBA #56817
S. TODD SIPE, WSBA #23203
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Counsel for Defendants

I declare under penalty of perjury under the laws of the State of Washington and
the United States of America that the foregoing is true and correct.

DATED this 6th day of January, 2025, at Seattle Washington.

/s/ Ian B. Crosby
Ian B. Crosby, WSBA #28461

The Honorable Lauren King

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

N.D. et al., on behalf of a class of those similarly
situated,

No. 2:22-cv-01621-LK

Plaintiffs,

v.

CHRIS REYKDAL, in his capacity as the
SUPERINTENDENT OF PUBLIC
INSTRUCTION and OFFICE OF THE
SUPERINTENDENT OF PUBLIC
INSTRUCTION, a Washington State agency,

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES**

Defendants.

This matter comes before the Court on Plaintiffs' motion for attorneys' fees pursuant to the settlement agreement and Order of Preliminary Approval (Dkt. #95). The Court heard argument on the Final Approval of the Settlement Agreement on February 26 at 10:00 am.

The Court finds Plaintiffs' counsels' hourly rates and hours worked are reasonable. The Court GRANTS Plaintiffs' Motion for Attorneys' Fees and costs in the amount of \$448,478.

SO ORDERED this _____ day of _____, 2025.

HONORABLE LAUREN KING
UNITED STATES DISTRICT JUDGE

1 Presented by:

2 /s/ Ian B. Crosby

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10 /s/ Lara Hruska

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22 *Attorneys for Plaintiffs*

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The Honorable Lauren King

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

N.D. et al., on behalf of a class of those
similarly situated,

No. 2:22-cv-01621-LK

Plaintiffs,

v.

CHRIS REYKDAL, in his capacity as the
SUPERINTENDENT OF PUBLIC
INSTRUCTION and OFFICE OF THE
SUPERINTENDENT OF PUBLIC
INSTRUCTION, a Washington State agency,

**DECLARATION OF IAN CROSBY IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES.**

Defendants.

I, Ian Crosby, declare as follows:

1. I am over the age of eighteen and competent to testify to the matters set forth herein.

I make this Declaration based on personal knowledge.

2. I am currently a partner at the law firm Susman Godfrey L.L.P. I was admitted to the practice of law in the State of Washington in 1998. I clerked in the Western District of Washington for the Honorable John Coughenour from 1998 to 1999, and in the United States Court of Appeals for the Ninth Circuit for the Honorable Robert Boochever from 1999 to 2000, after which I began the full-time practice of law as an associate at Susman Godfrey in October 2000. I was made a

1 partner at Susman Godfrey in December 2004 after second-chairing the negotiation that resulted in
2 a settlement of antitrust claims against Microsoft Corp. in an amount publicly reported to have been
3 more than \$500 million for our client Novell, Inc.

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5 3. In my over twenty-six years of admission to practice I have represented companies,
6 individuals, and classes of consumers in a wide variety of commercial cases. In recent years, my
7 practice has focused on intellectual property and class action litigation. Prominently, I am currently
8 lead counsel for *The New York Times* in their suit against OpenAI and Microsoft regarding the use
9 of copyrighted works scraped from the Internet to train and operate generative AI models, Case No.
10 1:23-cv-11195 (S.D.N.Y.).

11
12 4. I have also served as lead counsel for local public company Zillow Group in a number
13 of cases in the Western District of Washington. Currently, I am lead counsel for Zillow in defense
14 of a lawsuit by IBM asserting infringement of seven patents that is currently pending before Judge
15 Zilly, Case No. 2-20-cv-00851. I have been lead counsel for Zillow in multiple other concluded
16 lawsuits against Zillow in the Western District of Washington, including *International Business*
17 *Machines Corp. v. Zillow Group*, Case No. 2-20-cv-01130-TSZ, *Stross v. Zillow Inc.*, Case No. 2-
18 21-cv-01489-RAJ, and *VHT Inc. v. Zillow Group*, Case No. 2-15-cv-01096-JLR.

19
20 5. In recent years, I have also served as lead counsel for Seattle Children's Hospital in
21 King County Superior Court in *Kean v. Seattle Children's Hospital*, Case No. 20-2-16194-2-SEA. I
22 and my firm have also recently represented local client Perkins Coie in defending depositions of
23 their former employees in response to subpoenas issued in *Ex rel. AudienceScience v. Google*, Case
24 No. 5:22-cv-04756-EJD (N.D. Cal.).

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26 6. In addition to the instant case, I have argued multiple appeals to the United States
27 Courts of Appeals for the Ninth Circuit. Recent examples include two cross appeals in the *VHT v.*

1 *Zillow* matters mentioned above, Ninth Circuit Case Nos. 17-35587 & -88, and 22-35147 & -200. I
2 have also had multiple arguments or been on brief in multiple appeals to the United States Court of
3 Appeals for the Federal Circuit.

4 7. In the field of class action litigation, I recently presented the plaintiffs' damages
5 expert at trial in *In Re National Football League Sunday Ticket Antitrust Litigation*, Case No. 2:15-
6 ml-02668-PSK (C.D. Cal), in which the jury rendered a \$4.6 billion verdict that is now the subject
7 of a Ninth Circuit appeal. I am also counsel in two class action lawsuits against Google, the recently
8 settled but not finally resolved suit regarding Google's "Incognito" browser mode, *Brown v. Google*,
9 Case No. 4-20-cv-03664-YGR (N.D. Cal.), and the pending suit regarding Google "Firebase"
10 programming API, *Rodriguez v. Google*, Case No. 3:20-cv-04688-RS (N.D. Cal.).

11
12 8. My law firm has a national litigation practice, and we set our published rates
13 accordingly. Our firm capacity is fully utilized and we rarely if ever discount our rates to match local
14 markets. I have done hourly work for local clients, including in the publicly-filed lawsuits mentioned
15 above, as well as on a confidential basis, at my full, undiscounted hourly rates. My firm has never
16 discounted my published hourly rate or that of any lawyer in our firm form in any local matter for
17 which I have been the responsible attorney.

18
19 9. My published rates of \$850 to \$950 charged in this matter are commensurate with
20 recognized national benchmarks such as the *Fitzpatrick Matrix*¹ (\$831/hr.) and the *Laffey Matrix*²
21 (\$1,141/hr.) for lawyers of my seniority and experience.

22
23 10. My firm's published hourly rates have repeatedly been accepted or deemed
24 reasonable by courts throughout the country when approving fee awards in class action litigation.
25 For example, this past November the United States District Court for the Western District of
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27 ¹ <https://www.justice.gov/usao-dc/media/1353286/dl?inline>

² <http://www.laffeymatrix.com/see.html>

1 Missouri held, in *Burnett v. National Association of Realtors*, Case No. 19-CV-00332-SRB, Dkt.
2 No. 1622, at 30 (W.D. Mo., Nov. 24, 2024), with respect to those rates: “[T]he Court finds that the
3 rates of Class Counsel are both consistent with the market rates of other lawyers practicing complex
4 litigation of this type, including the firms defending this case, and that any increases in those rates
5 over time are consistent with the recent rise in rates across the profession.”
6

7 11. Susman Godfrey’s published hourly rates have likewise been found reasonable in at
8 least the following class action lawsuits: *37 Besen Parkway, LLC v. John Hancock (U.S.A.)*, No. 15-
9 cv-9924, ECF No. 164 at 19:6-13, 20:5-20 (S.D.N.Y. Mar. 18, 2019) (accepting Susman Godfrey’s
10 rates as reasonable); *Fleisher v. Phoenix Life Ins. Co.*, 2015 WL 10847814, at *18 (S.D.N.Y. Sept.
11 9, 2015) (finding Susman Godfrey’s rates “reasonable” and “comparable to peer plaintiffs and
12 defense-side law firms litigating matters of similar magnitude”); *Nitsch v. Dreamworks Animation*
13 *SKG Inc.*, 5:14-cv-4062, ECF No. 402, at 16-17 (N.D. Cal. June 5, 2017) (finding counsel rates,
14 including those for Susman Godfrey attorneys and staff, were reasonable); *id.* at 17 (finding
15 specifically with respect to the “[t]he three most senior attorneys on the case, who serve as the lead
16 attorney for each respective law firm,” including Susman Godfrey, that each of their rates were
17 reasonable because the “hourly rate is the same rate that he charges clients, including corporations
18 that are billed hourly”); *Markson v. CRST Int’l, Inc.*, 5:17-cv-1261, ECF No. 724, at 12-13 (N.D.
19 Cal. Feb. 17, 2023); *PHT Holding II LLC v. N. Am. Co. for Life & Health Ins.*, 2023 WL 8522980,
20 at *7 (S.D. Iowa Nov. 30, 2023); *Flo & Eddie, Inc. v. Sirius XM Radio, Inc.*, 2017 WL 4685536, at
21 *8 (C.D. Cal. 2017); *Fleisher v. Phoenix Life Ins. Co.*, 2015 WL 10847814, at *18 (S.D.N.Y. Sept.
22 9, 2015).
23
24

25 12. I have been honored to receive awards and professional recognition during my legal
26 career. For example, I have long been recognized as among the “Best Lawyers in America” by *U.S.*
27

1 *News and World Report* and was recently honored to be the only attorney named among “the nation’s
2 most powerful people in artificial intelligence” on *Business Insider’s* “2024 AI Power List.”

3 13. I have diligently tracked my hours in this matter. Attached to this declaration as
4 **Exhibit 1** are the complete billing records and expenses Susman Godfrey incurred in this matter.
5

6 I declare under the penalty of perjury under the laws of the United States the above is true
7 and correct.
8

9 Dated January 6, 2025
10

11 _____
12 /s/ Ian Crosby

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Ian B. Crosby

Exhibit 1

<u>Date</u>	<u>TKPR Name</u>	<u>Matter Name</u>	<u>Bs Amt</u>	<u>Bs Hrs</u>	<u>Task</u>	<u>Narrative</u>
9/9/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,162.50	1.50	CCLA12 Conferring by phone and email re case.
9/9/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,860.00	2.40	CCLA12 Opening case file.
9/21/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	232.50	0.30	CCLA12 Attending to file opening and preparation of initial pleadings.
11/3/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	697.50	0.90	CCLA05 Reviewing draft complaint.
11/11/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,162.50	1.50	CCLA05 Finalizing and filing complaint
11/10/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	387.50	0.50	CCLA05 Reviewing and revising draft complaint.
11/14/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,937.50	2.50	CCLA05 Preparing corrected complaint
11/15/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	387.50	0.50	CCLA12 Reviewing and responding to emails re preliminary relief
11/15/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	620.00	0.80	CCLA12 Attending call with team re case strategy.
11/21/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	387.50	0.50	CCLA12 Attending call with opposing counsel.
12/9/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,162.50	1.50	CCLA01 Researching law re additional claims.
12/20/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,937.50	2.50	CCLA12 Preparing for and attending Rule 26 Conference.
12/19/2022	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	542.50	0.70	CCLA12 Preparing Rule 26 Report.
1/3/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	425.00	0.50	CCLA09 Reviewing and revising electronic service agreement.
1/4/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	170.00	0.20	CCLA12 Reviewing and responding to emails re case management.
1/4/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	595.00	0.70	CCLA01 Researching law re burden of proof.
1/5/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,275.00	1.50	CCLA03 Reviewing and commenting on draft discovery.
1/5/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	595.00	0.70	CCLA12 Attending call with team.
1/6/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,955.00	2.30	CCLA03 Preparing Rule 26 report.
1/12/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	510.00	0.60	CCLA12 Attending team call.
1/17/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	765.00	0.90	CCLA03 Reviewing and revising written discovery.
1/12/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	680.00	0.80	CCLA12 Preparing task list.
1/12/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,700.00	2.00	CCLA03 Reviewing and revising discovery requests.
1/17/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	425.00	0.50	CCLA12 Attending to case management.
1/19/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	850.00	1.00	CCLA03 Revising and serving written discovery.
1/18/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,105.00	1.30	CCLA12 Reviewing, revising, and filing joint status report.
2/7/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	425.00	0.50	CCLA03 Preparing subpoenas to SBCTC.
2/7/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	255.00	0.30	CCLA05 Reviewing and commenting on amended complaint.
2/13/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	850.00	1.00	CCLA05 Preparing subpoenas to SBCTS.
3/2/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	510.00	0.60	CCLA05 Reviewing and revising motion for leave to amend.
3/2/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,870.00	2.20	CCLA03 Preparing correspondence with opposing counsel re discovery responses.
3/2/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	425.00	0.50	CCLA12 Preparing for and attending team call.
3/2/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	255.00	0.30	CCLA03 Reviewing and revising draft discovery responses.
3/10/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,530.00	1.80	CCLA03 Preparing requests for admission.
3/13/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	1,275.00	1.50	CCLA04 Reviewing SBCTC production.
3/14/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	255.00	0.30	CCLA03 Reviewing and responding to emails re discovery.
3/16/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	3,145.00	3.70	CCLA03 Preparing discovery letter brief.
3/13/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	680.00	0.80	CCLA05 Reviewing opposition to motion for leave to amend.
3/14/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	935.00	1.10	CCLA05 Preparing reply in support of motion for leave to amend.
3/16/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	3,060.00	3.60	CCLA05 Preparing reply in support of motion for leave to amend.
3/17/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	3,145.00	3.70	CCLA05 Preparing reply in support of motion for leave to amend.
3/16/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	510.00	0.60	CCLA12 Preparing for and attending team call.
3/6/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	2,890.00	3.40	CCLA03 Preparing responses and objections to written discovery.
3/7/2023	Crosby, Ian B.	SG Fees & Costs:	v. State of WA	425.00	0.50	CCLA03 Reviewing supplemental interrogatory responses.

3/7/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,105.00	1.30	CCLA03	Preparing for and attending meet and confer.
3/23/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	5,015.00	5.90	CCLA03	Preparing for SBCTC deposition
3/30/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,295.00	2.70	CCLA03	Preparing reply in support of motion to compel.
3/31/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	680.00	0.80	CCLA03	Revising and filing LCR 37 brief.
4/10/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,675.00	5.50	CCLA03	Preparing for and attending SBCTC deposition.
4/11/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,275.00	1.50	CCLA05	Reviewing and conferring with team re order on motion for leave to amend.
4/13/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	255.00	0.30	CCLA05	Preparing email to opposing counsel re amended complaint.
4/13/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA06	Researching law re preliminary injunction and class certification.
4/13/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,445.00	1.70	CCLA12	Preparing for and attending weekly call.
4/26/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	595.00	0.70	CCLA05	Preparing PI motion.
4/27/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,190.00	1.40	CCLA05	Preparing PI motion.
4/28/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,380.00	2.80	CCLA05	Preparing PI motion.
5/1/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA05	Preparing PI motion.
5/2/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,700.00	2.00	CCLA05	Preparing PI motion.
5/4/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	680.00	0.80	CCLA12	Preparing for and attending weekly call.
5/3/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	5,525.00	6.50	CCLA05	Preparing PI motion.
5/5/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA05	Revising PI motion.
5/8/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,360.00	1.60	CCLA05	Preparing declarations in support of PI motion.
5/10/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,675.00	5.50	CCLA05	Finalizing and filing PI motion.
5/11/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	340.00	0.40	CCLA12	Preparing for and attending team call.
5/11/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	510.00	0.60	CCLA03	Attending to discovery supplementation.
5/9/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	595.00	0.70	CCLA05	Preparing declarations in support of PI motion.
5/9/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,040.00	2.40	CCLA05	Revising PI brief.
5/12/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	680.00	0.80	CCLA03	Attending to inadvertent production and privilege issue.
5/25/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	425.00	0.50	CCLA12	Preparing for and attending team call.
6/7/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	7,905.00	9.30	CCLA05	Preparing reply in support of motion for preliminary injunction.
6/8/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,020.00	1.20	CCLA05	Revising PI reply brief.
6/9/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,380.00	2.80	CCLA05	Finalizing PI reply brief.
6/8/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	5,270.00	6.20	CCLA05	Preparing reply in support of motion for preliminary injunction.
6/6/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	8,160.00	9.60	CCLA05	Preparing reply in support of motion for preliminary injunction.
7/6/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,720.00	3.20	CCLA05	Preparing class certification motion.
7/6/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	765.00	0.90	CCLA12	Preparing for and attending call with team.
7/5/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,190.00	1.40	CCLA05	Preparing class cert motion.
7/10/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA05	Finalizing and filing class certification motion.
7/13/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	255.00	0.30	CCLA12	Attending call with team.
7/18/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,785.00	2.10	CCLA05	Researching law re regular high school diploma issue.
7/19/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,190.00	1.40	CCLA05	Researching law re picking off class representatives.
7/20/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,105.00	1.30	CCLA12	Preparing for and attending call with team.
7/31/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,275.00	1.50	CCLA05	Reviewing and commenting on class cert opposition.
8/4/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,165.00	4.90	CCLA05	Preparing reply in support of class certification motion.
8/2/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA05	Preparing reply in support of class certification motion.
8/3/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	8,925.00	10.50	CCLA05	Preparing reply in support of class certification motion.
7/31/2023	Tameez, Zaakir	SG Fees & Costs:	[REDACTED]	v. State of WA	25.00	0.20	CCLA12	Conferring by phone with partner to learn about the case.
8/1/2023	Tameez, Zaakir	SG Fees & Costs:	[REDACTED]	v. State of WA	250.00	2.00	CCLA01	Researching re Rule 37(c)(1) sanctions.

8/3/2023	Tameez, Zaakir	SG Fees & Costs:	[REDACTED]	v. State of WA	625.00	5.00	CCLA01	Researching case law on "picking off class representatives" doctrine. Drafting memorandum re "picking off class representatives" doctrine.
8/4/2023	Tameez, Zaakir	SG Fees & Costs:	[REDACTED]	v. State of WA	500.00	4.00	CCLA01	Researching case law on "picking off class representatives" doctrine. Drafting memorandum "picking off class representatives" doctrine. Finalizing same.
8/10/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	340.00	0.40	CCLA12	Preparing for and attending call with team.
8/10/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	5,865.00	6.90	CCLA05	Preparing supplemental brief re graduation issue.
8/11/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,675.00	5.50	CCLA05	Revising and filing supplemental brief re PI.
8/31/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,975.00	3.50	CCLA05	Preparing motion for reconsideration.
9/4/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA08	Preparing opening brief.
9/5/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	11,390.00	13.40	CCLA08	Preparing opening brief.
9/1/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA05	Revising motion for reconsideration.
9/1/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	680.00	0.80	CCLA08	Preparing motion for expedited appeal.
9/6/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	8,925.00	10.50	CCLA08	Preparing opening brief.
9/7/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,105.00	1.30	CCLA08	Preparing corrected excerpts of record.
9/6/2023	Stanley, Joanna	SG Fees & Costs:	[REDACTED]	v. State of WA	600.00	1.50	CCLA05	Preparing index and excerpt records for filing.
9/7/2023	Stanley, Joanna	SG Fees & Costs:	[REDACTED]	v. State of WA	400.00	1.00	CCLA05	Updating brief, index and excerpt records per court.
9/8/2023	Stanley, Joanna	SG Fees & Costs:	[REDACTED]	v. State of WA	400.00	1.00	CCLA05	Updating brief, index and excerpt records per court.
9/24/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,975.00	3.50	CCLA05	Preparing for oral argument on motion to reconsider.
9/25/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,125.00	2.50	CCLA05	Preparing for oral argument on motion to reconsider.
9/26/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,505.00	5.30	CCLA05	Preparing for and attending hearing on motion to reconsider.
10/19/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	340.00	0.40	CCLA12	Attending team call.
10/26/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	340.00	0.40	CCLA12	Attending call with team.
10/26/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	850.00	1.00	CCLA08	Revising amended appeal brief.
10/26/2023	Stanley, Joanna	SG Fees & Costs:	[REDACTED]	v. State of WA	400.00	1.00	CCLA05	Preparing amended record excerpts and amended appendix.
10/27/2023	Stanley, Joanna	SG Fees & Costs:	[REDACTED]	v. State of WA	600.00	1.50	CCLA05	Reviewing brief and updating cites.
10/27/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,420.00	5.20	CCLA08	Finalizing and filing amended appeal brief.
11/9/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	255.00	0.30	CCLA12	Attending call with team.
11/21/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	5,440.00	6.40	CCLA08	Preparing reply brief.
11/22/2023	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	3,655.00	4.30	CCLA08	Preparing reply brief.
3/19/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	4,750.00	5.00	CCLA09	Preparing for oral argument.
3/18/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,375.00	2.50	CCLA09	Preparing for oral argument.
3/20/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	6,745.00	7.10	CCLA09	Preparing for oral argument.
3/24/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	5,035.00	5.30	CCLA09	Preparing for oral argument.
3/25/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	2,850.00	3.00	CCLA09	Preparing for and attending oral argument.
6/17/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	855.00	0.90	CCLA11	Attending call with team re settlement proposal.
6/20/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	475.00	0.50	CCLA12	Revising draft joint status report.
6/20/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	475.00	0.50	CCLA05	Attending to filing of motion to transfer fee application.
6/25/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	380.00	0.40	CCLA12	Reviewing and responding to email re joint statement.
7/5/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	760.00	0.80	CCLA11	Reviewing and responding to emails re settlement proposal.
7/8/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	475.00	0.50	CCLA11	Reviewing and responding to emails re settlement proposal.
7/8/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	855.00	0.90	CCLA11	Attending call re settlement.
7/10/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	475.00	0.50	CCLA06	Reviewing and discussing preliminary injunction order.
7/17/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	570.00	0.60	CCLA01	Researching law re limitations and state agencies.
7/12/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,045.00	1.10	CCLA11	Preparing response to offer of judgment.
7/15/2024	Crosby, Ian B.	SG Fees & Costs:	[REDACTED]	v. State of WA	1,045.00	1.10	CCLA11	Revising settlement offer.

7/15/2024	Crosby, Ian B.	SG Fees & Costs: [REDACTED]	v. State of WA	855.00	0.90	CCLA01	Researching law re offer of judgment in class case.
7/18/2024	Crosby, Ian B.	SG Fees & Costs: [REDACTED]	v. State of WA	380.00	0.40	CCLA11	Preparing response to email re settlement and conferring with team re same.
8/5/2024	Crosby, Ian B.	SG Fees & Costs: [REDACTED]	v. State of WA	760.00	0.80	CCLA11	Finalizing and filing motion for preliminary approval.
8/1/2024	Crosby, Ian B.	SG Fees & Costs: [REDACTED]	v. State of WA	475.00	0.50	CCLA11	Preparing motion for preliminary approval.
8/2/2024	Crosby, Ian B.	SG Fees & Costs: [REDACTED]	v. State of WA	380.00	0.40	CCLA11	Reviewing and responding to emails re motion for preliminary approval.

Totals:			245,067.50	298.50			
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Disb ID	Date	Orig Per	Cost Code	Cost Desc	Matter	Status	Base Amt	Tkpr	TKPR Name	Narrative
3021866	1/5/2023	202302	RESRCH	Research charges	017545.X	W	10.85	4720	Crosby, Ian B.	WESTLAW - Research charges; 1/5/2023
3021867	1/19/2023	202302	RESRCH	Research charges	017545.X	W	21.69	4720	Crosby, Ian B.	WESTLAW - Research charges; 1/19/2023
3024367	1/18/2023	202302	PACER	Court Document Alerts	017545.X	W	0.30	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 1/18/2023
3038666	3/6/2023	202303	RESRCH	Research charges	017545.X	W	14.36	4720	Crosby, Ian B.	WESTLAW - Research charges; 3/6/2023
3038667	3/16/2023	202303	RESRCH	Research charges	017545.X	W	104.56	4720	Crosby, Ian B.	WESTLAW - Research charges; 3/16/2023
3038668	3/17/2023	202303	RESRCH	Research charges	017545.X	W	14.36	4720	Crosby, Ian B.	WESTLAW - Research charges; 3/17/2023
3042098	3/6/2023	202304	PACER	Court Document Alerts	017545.X	W	0.20	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 3/6/2023
3042168	3/13/2023	202304	PACER	Court Document Alerts	017545.X	W	0.40	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 3/13/2023
3047260	4/13/2023	202305	RESRCH	Research charges	017545.X	W	9.33	4720	Crosby, Ian B.	WESTLAW - Research charges; 4/13/2023
3049537	4/13/2023	202305	PACER	Court Document Alerts	017545.X	W	6.00	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 4/13/2023
3049541	4/13/2023	202305	PACER	Court Document Alerts	017545.X	W	1.30	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 4/13/2023
3059650	5/23/2023	202306	PACER	Court Document Alerts	017545.X	W	0.50	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 5/23/2023
3066135	6/6/2023	202307	RESRCH	Research charges	017545.X	W	67.57	4720	Crosby, Ian B.	WESTLAW - Research charges; 6/6/2023
3066136	6/7/2023	202307	RESRCH	Research charges	017545.X	W	20.45	4720	Crosby, Ian B.	WESTLAW - Research charges; 6/7/2023
3066137	6/8/2023	202307	RESRCH	Research charges	017545.X	W	10.22	4720	Crosby, Ian B.	WESTLAW - Research charges; 6/8/2023
3074310	7/19/2023	202307	RESRCH	Research charges	017545.X	W	60.07	4720	Crosby, Ian B.	WESTLAW - Research charges; 7/19/2023
3076982	7/10/2023	202307	PACER	Court Document Alerts	017545.X	W	0.50	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 7/10/2023
3077107	7/18/2023	202307	PACER	Court Document Alerts	017545.X	W	1.00	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 7/18/2023
3083729	8/3/2023	202309	RESRCH	Research charges	017545.X	W	14.42	4720	Crosby, Ian B.	WESTLAW - Research charges; 8/3/2023
3083730	8/4/2023	202309	RESRCH	Research charges	017545.X	W	24.71	4720	Crosby, Ian B.	WESTLAW - Research charges; 8/4/2023
3083731	8/31/2023	202309	RESRCH	Research charges	017545.X	W	47.96	4720	Crosby, Ian B.	WESTLAW - Research charges; 8/31/2023
3086724	8/3/2023	202309	PACER	Court Document Alerts	017545.X	W	3.50	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 8/3/2023
3086727	8/3/2023	202309	PACER	Court Document Alerts	017545.X	W	0.20	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 8/3/2023
3087745	8/31/2023	202309	RESRCH	Research charges	017545.X	W	97.48			LexisNexis - Research charges, 08/01/2023 - 08/31/2023
3093217	9/1/2023	202309	RESRCH	Research charges	017545.X	W	12.54	4720	Crosby, Ian B.	WESTLAW - Research charges; 9/1/2023
3093218	9/5/2023	202309	RESRCH	Research charges	017545.X	W	37.63	4720	Crosby, Ian B.	WESTLAW - Research charges; 9/5/2023
3113690	11/21/2023	202312	RESRCH	Research charges	017545.X	W	13.20	4720	Crosby, Ian B.	WESTLAW - Research charges; 11/21/2023
3117358	11/8/2023	202312	PACER	Court Document Alerts	017545.X	W	0.40	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 11/8/2023
3117695	11/21/2023	202312	PACER	Court Document Alerts	017545.X	W	0.40	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 11/21/2023
3146181	1/3/2024	202402	PACER	Court Document Alerts	017545.X	W	1.10	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 1/3/2024
3146897	1/29/2024	202402	PACER	Court Document Alerts	017545.X	W	0.10	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 1/29/2024
3157205	2/1/2024	202403	PACER	Court Document Alerts	017545.X	W	0.10	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 2/1/2024
3157323	2/5/2024	202403	PACER	Court Document Alerts	017545.X	W	0.20	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 2/5/2024
3165002	3/18/2024	202404	RESRCH	Research charges	017545.X	W	19.97	4720	Crosby, Ian B.	WESTLAW - Research charges; 3/18/2024
3165003	3/24/2024	202404	RESRCH	Research charges	017545.X	W	3.57	4720	Crosby, Ian B.	WESTLAW - Research charges; 3/24/2024
3213504	7/15/2024	202408	RESRCH	Research charges	017545.X	W	17.23	4720	Crosby, Ian B.	WESTLAW - Research charges; 7/15/2024
3229894	8/1/2024	202409	PACER	Court Document Alerts	017545.X	W	0.90	4720	Crosby, Ian B.	Pacer - Court Document Alerts; 8/1/2024

TOTAL:**639.27**

<u>Disb ID</u>	<u>Date</u>	<u>Orig Per</u>	<u>Cost Code</u>	<u>Cost Desc</u>	<u>Matter</u>	<u>Status</u>	<u>Base Amt</u>	<u>Tkpr</u>	<u>TKPR Name</u>	<u>Narrative</u>
3043885	4/7/2023	202304	DEPEXP	Deposition Expenses	017545.Y	W	285.00	4720	Crosby, Ian B.	VENDOR: DEPOSITION SOLUTIONS LLC (LEXITAS) INVOICE#: 1428618 DATE: 4/7/2023 Cancellation Fee - Stenographer for deposition of Aileen Miller, 03/27/2023
3060299	4/24/2023	202306	VTDEPO	Videotaped Deposition Expense	017545.Y	W	1,297.50	4720	Crosby, Ian B.	VENDOR: DEPOSITION SOLUTIONS LLC (LEXITAS) INVOICE#: 1434057 DATE: 4/24/2023 Original Transcript & 1 Copy - Video Testimony of Troy Goracke
3099434	9/29/2023	202310	TRIALT	Trial Transcripts	017545.Y	W	234.35	4720	Crosby, Ian B.	VENDOR: Chatelain, Marci INVOICE#: 20230098 DATE: 9/29/2023 Transcript Service
3122171	12/6/2023	202312	FFEE	Filing Fees	017545.Y	W	451.20	4720	Crosby, Ian B.	VENDOR: COUNSEL PRESS INC. INVOICE#: 0009155811 DATE: 12/6/2023 Reply Brief Filing
3126700	12/6/2023	202401	FFEE	Filing Fees	017545.Y	W	1,484.35	4720	Crosby, Ian B.	VENDOR: COUNSEL PRESS INC. INVOICE#: 0009155788 DATE: 12/6/2023 Appellants Opening Brief Filing
Hard Costs:							3,752.40			
Lit Funds							0.00			
Total:							3,752.40			

The Honorable Lauren King

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

N.D. et al., on behalf of a class of those
similarly situated,

No. 2:22-cv-01621-LK

Plaintiffs,

v.

CHRIS REYKDAL, in his capacity as the
SUPERINTENDENT OF PUBLIC
INSTRUCTION and OFFICE OF THE
SUPERINTENDENT OF PUBLIC
INSTRUCTION, a Washington State agency,

**DECLARATION OF LARA HRUSKA IN
SUPPORT OF MOTION FOR
ATTORNEYS FEES AND COSTS.**

Defendants.

I, Lara Hruska, declare as follows:

1. I am over the age of eighteen and competent to testify to the matters set forth herein. I make this Declaration based on personal knowledge.

2. I am the founder and managing partner of Cedar Law PLLC. I founded Cedar Law PLLC in November 2014 based on a holistic approach to school law informed by my experience as an educator, social worker, and attorney.

3. In April or May of 2022, I was approached by T.D., the mother of N.D. regarding her son's ability to access special education beyond his twenty-first birthday. I agreed to take her case on a

1 “fee-shifting” basis, whereby I would not charge T.D. for the representation given that the IDEA
2 contains a fee-hook for parents who prevail. This is a typical practice of Cedar Law.

3 4. Cedar Law utilizes Clio Manage, an online service, to track and bill our hourly work. All
4 attorneys and paralegals at Cedar are expected to enter their time for their work contemporaneously
5 in Clio Manage.

6 5. Attached to this declaration as **Exhibit 1** is a true and correct printout of all time billed to
7 this matter (with appropriate redactions to protect the named plaintiffs and their families). In total,
8 Cedar Law spent **523.7** hours working on this matter.

9 6. Given the length of time expected to work on this case and the complex nature of the work
10 expected in a class action, I chose to bill at the following rates:

- 11 a. \$500 for myself
- 12 b. \$400 for Mr. Hagel, and
- 13 c. \$200 for Ms. Leifur-Masterson

14 These rates are reasonable when considered against the market and each person’s experience.
15 Cedar’s rates have previously been approved in multiple state level Settlement Guardian Ad Litem
16 agreements.

17 7. As previously indicated, a significant portion of the work Cedar Law does involve claims
18 and issues under the Individuals with Disabilities Education Act (IDEA). Our firm leverages the
19 extensive experience of our attorneys as former educators, in-house school district general counsel,
20 and administrative law judges to find solutions to our clients’ and their families’ unique and
21 challenging needs within the special education realm. Our firm represents clients in all stages of an
22 IDEA dispute – from attending thousands of IEP meetings with our clients up through argument in
23 front of the Ninth Circuit.

24 8. In recognition of our expertise in this subject matter area, our firm (including attorney Alex
25 Hagel and myself) was asked in 2020 and then again in 2023 to produce and present a multi-part
26 CLE series for the WSBA on education law, with two modules especially focused on special
27 education law and civil rights in education. These CLE presentations have been viewed by our

1 colleagues around the state. We have also presented dozens of times over the years to governmental,
2 nonprofit, and private entities wishing to learn more about special education law and civil rights in
3 education.

4 9. Prior to attending law school, I received an MSW in Child and Family Welfare Policy from
5 Columbia University, an MEd in Special and General Childhood Education from Bank Street
6 College of Education, and a BA in Peace and Conflict Studies from U.C. Berkeley. I taught children
7 from pre-kindergarten through middle school in California, New York, and Louisiana, where I
8 served as the founding special education director for two post-Katrina charter schools in New
9 Orleans.

10 10. Prior to forming Cedar Law in 2015, I worked at a Seattle litigation firm representing
11 traditional school districts around the State of Washington with day-to-day general counsel advice
12 and provided representation in state and federal litigation and administrative proceedings.

13 11. Mr. Hagel is Cedar's newest partner, being promoted from senior associate at the start of the
14 year. He graduated from the University of Washington School of Law, where he worked in the
15 Children and Youth Advocacy Clinic representing homeless and low-income children in the
16 dependency system. During law school, Mr. Hagel also interned with the U.S. Attorney's Office,
17 Civil Rights Division, and with the Department of Education's Office for Civil Rights, enforcing
18 civil rights laws that protect students from discrimination.

19 12. Mr. Hagel joined Cedar Law immediately out of law school and has represented hundreds of
20 families and students in due process proceedings, including multiple appeals to federal court.

21 13. Prior to law school, Mr. Hagel was a high school science teacher and soccer coach in Arizona,
22 where he led the freshman science curriculum team at his school. He also co-taught special education
23 classes, where he worked collaboratively with special education teachers, students, and their parents
24 to help students succeed in the classroom.

25 14. Kaitlin Leifur-Masterson was, for the majority of this litigation, Cedar's primary paralegal.
26 She graduated from the University of Washington with a Master of Fine Arts in creative writing and
27 poetics in 2016, and a Bachelors from Boston University in 2010. During the entire course of this

1 litigation, Ms. Leifur-Masterson participated in the Washington Admission Practice Rule 6 program
2 – a four year program designed to provide the required educational and practical experience to
3 become an attorney. Ms. Leifur-Masterson passed the Washington State Bar Exam in September of
4 2024 and was sworn in as an attorney that same month. Ms. Leifur-Masterson joined Cedar Law in
5 February of 2019 and has been working in the legal field since 2012.

6 15. Both Mr. Hagel and I are also members of the Oregon State Bar. It is my experience that the
7 rates special education attorneys charge here in Seattle are comparatively higher than those in
8 Portland, Oregon, but we attempt to track the Oregon rates when possible. Attached to this
9 declaration as **Exhibit 2** are two pages of the Oregon State Bar 2022 Economic Survey Report of
10 Findings (specifically Table 36), which breaks down the Mean, Median and 95th Percentile billing
11 rate of Oregon attorneys by years of practice. Both my rate of \$500 based on my twelve years of
12 experience, and Mr. Hagel’s rate of \$400 based on his 5 years of experience are within the values of
13 that chart. The full economic survey is available at
14 https://www.osbar.org/_docs/resources/Econsurveys/22EconomicSurvey.pdf.

15 16. The team at Cedar Law worked closely with Ian Crosby at Susman Godfrey to ensure that
16 there was always coordination of work to avoid duplication of work whenever possible. This was
17 accomplished by initially weekly team meetings, which gradually faded to monthly meetings. Many
18 entries, including those around September of 2023 reflect all-hands on deck work to complete the
19 time sensitive appeal and related documents.

20
21 I declare under the penalty of perjury under the laws of the United States the above is true
22 and correct.

23
24 Dated January 6, 2025

25
26 

27 Lara Hruska

Exhibit 1

Date	Activity category	Description	Hours	Rate (\$)	Billable (\$)	Non-billab	User
5/17/2022	Phone Call	Prep and have phone call re: IDEA case, debrief with client	1	500	500		Lara Hruska
5/19/2022	Draft	Draft & send email to OSPI AAG re legal analysis for IDEA to 22	1	500	500		Lara Hruska
5/20/2022	Phone Call	Prep and have phone call re: IDEA case, debrief with client	1	500	500		Lara Hruska
5/23/2022	Correspondence	With AG re: Circuit Court Decision on IDEA Eligibility	0.5	500	250		Lara Hruska
5/24/2022	Correspondence	Mult corr and follow up with M Barber, A Miller and client re: Inquiry re Circuit Court Decision on IDEA Eligibility	0.4	500	200		Lara Hruska
6/8/2022	Correspondence	Update clients and cocounsel re: call with OSPI	0.3	500	150		Lara Hruska
6/8/2022	Correspondence	Follow up with I Crosby and client re: OSPI, strategy	0.4	500	200		Lara Hruska
6/12/2022	Correspondence	Follow up with team re: OSPI	0.2	500	100		Lara Hruska
6/22/2022	Meeting	F/u with OSPI & Cedar re IDEA to 22	1	500	500		Lara Hruska
7/1/2022	Correspondence	Advise client re: response to discharge letter	0.1	500	50		Lara Hruska
7/15/2022	Review	Review client draft response	0.1	500	50		Lara Hruska
7/28/2022	Meeting	Prepare for and attend OSPI Debrief re 22 IDEA. debrief with client	1	500	500		Lara Hruska
8/1/2022	Review	Follow up with team re: special ed/common interest	0.1	500	50		Lara Hruska
8/2/2022	Review	Review and revise client draft email	0.2	500	100		Lara Hruska
8/2/2022	Review	With A Miller and M Barber re: Request for District Guidance	0.2	500	100		Lara Hruska
8/17/2022	Correspondence/Email	With team, A Miller and M Barber re: FAQ & status with OSPI	0.3	500	150		Lara Hruska
8/19/2022	Correspondence/Email	Review and respond to draft client email	0.1	500	50		Lara Hruska
8/22/2022	Correspondence/Email	F/u with district re: guidance	0.1	500	50		Lara Hruska
8/30/2022	Correspondence/Email	Review and respond to client and team emails re: next steps, due process filing	0.2	500	100		Lara Hruska
9/2/2022	Correspondence/Email	Review and respond to emails re: IDEA to 22 Class Action	0.1	500	50		Lara Hruska
9/2/2022	Correspondence/Email	Respond to client questions and follow up with team re: OSPI exit data, program completion	0.2	500	100		Lara Hruska
9/8/2022	Correspondence/Email	Review and respond to client questions	0.1	500	50		Lara Hruska
9/9/2022	Correspondence/Email	Respond to client questions	0.2	500	100		Lara Hruska
9/13/2022	Correspondence/Email	Review and respond to team re: next steps, LWSD enrollment	0.1	500	50		Lara Hruska
9/20/2022	Phone Call	OSPI Call re: next steps / A-C and CI, debrief with client after	1	500	500		Lara Hruska
10/19/2022	Meeting	Strategy meeting with KLM re drafting complaint.	0.5	500	250		Lara Hruska
10/19/2022	Meeting	Meeting w/ LRH re drafting complaint.	0.2	200	40		Kaitlin Leifur-Masterson
10/19/2022	Correspondence/Email	With client and team re: Class action filing	0.2	500	100		Lara Hruska
10/20/2022	Draft	Review sample pleadings and begin drafting complaint.	0.8	200	160		Kaitlin Leifur-Masterson
10/21/2022	Draft	Continue drafting class action complaint.	4	200	800		Kaitlin Leifur-Masterson
10/24/2022	Draft	Continue drafting complaint	2.6	200	520		Kaitlin Leifur-Masterson
10/25/2022	Draft	Continue drafting complaint.	2.3	200	460		Kaitlin Leifur-Masterson
10/25/2022	Draft	Continue drafting complaint	0.7	200	140		Kaitlin Leifur-Masterson
10/25/2022	Correspondence/Email	Emails to/from LRH, TD, AH, co-counsel re draft complaint.	0.1	200	20		Kaitlin Leifur-Masterson
10/25/2022	Correspondence/Email	Follow up with client and cocounsel re: draft complaint	0.2	500	100		Lara Hruska
10/26/2022	Review	Review complaint by KLM	1	500	500		Lara Hruska
11/2/2022	Review	Review TMD revisions & make Cedar revisions & sent to Ian for final review	1	500	500		Lara Hruska
11/7/2022	Correspondence/Email	Emails to/from ████████ team re complaint and scheduling a time to meet.	0.1	200	20		Kaitlin Leifur-Masterson
11/9/2022	Meeting	Strategy zoom meeting w/ LRH, ████████ and co-counsel	0.3	200	60		Kaitlin Leifur-Masterson
11/9/2022	Meeting	Call with TMD & Zoom with litigation team	1	500	500		Lara Hruska
11/14/2022	Review	Reviewing complaint and starting to review documents to get back up to speed on case	2.7	500	1350		Alex Hagel
11/15/2022	Meeting	Meeting w/ LRH, Ian, ████████ AH re service and next steps.	0.6	200	120		Kaitlin Leifur-Masterson
11/15/2022	Meeting	Team meeting re TRO v PMSJ	0.6	500	300		Lara Hruska
11/15/2022	Draft	Draft press release	1.9	200	380		Kaitlin Leifur-Masterson
11/15/2022	Meeting	Team meeting regarding next steps now that action filed	1	500	500		Alex Hagel
11/16/2022	Correspondence/Email	Emails from team re service.	0.2	200	40		Kaitlin Leifur-Masterson
11/16/2022	Draft	Draft & revise and circulate press release statement.	1.2	500	600		Lara Hruska

11/16/2022	Correspondence/Email	Multiple emails re FRCP 4 and service	0.9	500	450	Lara Hruska
11/16/2022	Review	Review press release and proposed changes from team.	0.1	200	20	Kaitlin Leifur-Masterson
11/17/2022	Research	Research and compile list of education reporters	1.5	500	750	Jessica Johanson-Kubin
11/18/2022	Review	Review press correspondence and article re lawsuit	0.1	200	20	Kaitlin Leifur-Masterson
11/21/2022	Meeting	Attend meeting w/ AG's office, LRH, and Ian Crosby. Debrief with client from meeting with AAG & litigation team.	0.5	200	100	Kaitlin Leifur-Masterson
11/21/2022	Correspondence		1	500	500	Lara Hruska
11/21/2022	Meeting	Attend meeting w/ AG's office, KLM, and Ian Crosby. Call with client re class certification issue & next steps for trial.	0.5	500	250	Lara Hruska
11/22/2022	Phone Call	Meeting w/ LRH, AH, Ian, and Todd Sipes re JSR and Discovery Conference.	0.7	500	350	Lara Hruska
12/20/2022	Meeting		0.7	200	140	Kaitlin Leifur-Masterson
12/20/2022	Correspondence/Email	Email notes from meeting to LRH, AH, Ian. 26f conference with AAG & debrief with Ian & then client afterwards.	0.1	200	20	Kaitlin Leifur-Masterson
12/21/2022	Meeting		1.6	500	800	Lara Hruska
12/29/2022	Meeting	Meeting re discovery with KLM & TMD Review client documents for initial disclosures to produce by 1/13 & email team re same.	0.9	500	450	Lara Hruska
12/29/2022	Review		1	500	500	Lara Hruska
12/29/2022	Meeting	Meeting w/ LRH, ct re discovery Review model stipulated protective order from WDWA court website & circulate to cocounsel & client.	0.5	200	100	Kaitlin Leifur-Masterson
12/29/2022	Draft		0.4	500	200	Lara Hruska
1/3/2023	Draft	Draft initial discovery requests to OSPi	2.8	200	560	Kaitlin Leifur-Masterson
1/4/2023	Draft	Begin drafting 30(b)(6) notice	0.3	200	60	Kaitlin Leifur-Masterson
1/4/2023	Review	Review & revise draft discovery.	0.5	500	250	Lara Hruska
1/4/2023	Correspondence/Email	Review JSR drafts exchanged between counsel	0.3	500	150	Lara Hruska
1/4/2023	Correspondence/Email	Email to/from LRH re draft discovery requests	0.1	200	20	Kaitlin Leifur-Masterson
1/5/2023	Meeting	Team meeting re discovery, adding another plaintiff	0.5	200	100	Kaitlin Leifur-Masterson
1/5/2023	Meeting	Team meeting re discovery, adding another plaintiff	0.5	500	250	Lara Hruska
1/5/2023	Meeting	Team meeting re discovery, adding another plaintiff With team re: Revised stipulation and order for protection	0.5	400	200	Alex Hagel
1/5/2023	Correspondence		0.1	500	50	Lara Hruska
1/6/2023	Draft	Stipulated Protective Order	0.8	150	120	Amy Schley
1/6/2023	Draft	Draft revised stipulated protective order	0.5	500	250	Lara Hruska
1/6/2023	Correspondence	With team and SD re: Draft Stipulated Protective Order	0.1	500	50	Lara Hruska
1/9/2023	Discovery	Continue drafting discovery requests Email to/from LRH, Nicole re bates numbering docs to be produced in initial disclosures.	1.2	200	240	Kaitlin Leifur-Masterson
1/9/2023	Correspondence/Email		0.1	200	20	Kaitlin Leifur-Masterson
1/9/2023	Correspondence	With team re: records batches, drafts of initial disclosures	0.2	500	100	Lara Hruska
1/10/2023	Draft	Continue drafting roggs/rfps to OSPi Draft subpoena to Washington State Community and Technical Colleges	1.3	200	260	Kaitlin Leifur-Masterson
1/10/2023	Draft		1.6	200	320	Kaitlin Leifur-Masterson
1/11/2023	Draft	Begin drafting initial disclosures. Reviewing discovery requests and preparing subpoena/30(b)(6) topics	0.9	200	180	Kaitlin Leifur-Masterson
1/11/2023	Discovery		2.7	400	1080	Alex Hagel
1/12/2023	Meeting	Team meeting re discovery and task assignments	0.5	200	100	Kaitlin Leifur-Masterson
1/12/2023	Meeting	Team meeting with ICRO & AFH & KLM & client	0.5	500	250	Lara Hruska
1/12/2023	Meeting	Team meeting with ICRO & LRH & KLM & client With team and client re: initial disclosures, withholding until protective order	0.5	400	200	Alex Hagel
1/12/2023	Correspondence		0.1	500	50	Lara Hruska
1/13/2023	Review	Review initial disclosure docs, add, Bates no, and mark additional emails confidential Reviewing E.R.K in light of D's joint disclosure statements	0.6	200	120	Kaitlin Leifur-Masterson
1/18/2023	Research	Meeting w/ Ian, [REDACTED] AH re case status and next steps.	0.6	400	240	Alex Hagel
1/26/2023	Meeting		0.1	200	20	Kaitlin Leifur-Masterson
1/26/2023	Correspondence/Email	Multiple correspondence re parallel leg effort.	0.5	500	250	Lara Hruska
1/26/2023	Meeting	Client meeting with TMD. Zoom meeting w/ LRH, AH, and the [REDACTED] family re joining class action.	0.5	500	250	Lara Hruska
1/30/2023	Meeting		0.7	200	140	Kaitlin Leifur-Masterson
1/30/2023	Meeting	Zoom meeting w/ LRH, KLM, and the [REDACTED] family re joining class action. With team and client following up on subpoena and next steps	0.7	400	280	Alex Hagel
1/30/2023	Correspondence		0.2	400	80	Alex Hagel
1/31/2023	Review	Review notes, case file, emails for final complaint in preparation to draft revisions. Meeting w/ AH, Ian, and [REDACTED] re case status and next steps.	1.2	400	480	Alex Hagel
2/2/2023	Meeting		0.1	400	40	Alex Hagel

2/3/2023	Draft	Draft Amended Complaint and circulate to LRH, AH for review.	0.8	400	320	Alex Hagel
2/3/2023	Discovery	Receive, circulate, and quickly review D's Roggs/RFPs	0.1	400	40	Alex Hagel
2/6/2023	Review	Review amended complaint & circulate to team.	0.4	400	160	Alex Hagel
2/8/2023	Draft	Draft/revise amended complaint	0.8	400	320	Alex Hagel
2/9/2023	Draft	Revise complaint based on client input.	0.2	400	80	Alex Hagel
2/9/2023	Meeting	Weekly team meeting w/ [REDACTED] lan, LRH, AH	0.5	500	250	Lara Hruska
2/9/2023	Meeting	Participated in weekly meeting with team	0.5	400	200	Alex Hagel
2/9/2023	Meeting	Participated in weekly meeting with team	0.5	200	100	Kaitlin Leifur-Masterson
2/16/2023	Meeting	Attend team meeting	0.4	400	160	Alex Hagel
2/16/2023	Meeting	Attend team meeting	0.4	500	200	Lara Hruska
2/16/2023	Meeting	Attend team meeting	0.4	200	80	Kaitlin Leifur-Masterson
2/21/2023	Review	Review SDT from OSPI to SPS.	0.1	400	40	Alex Hagel
2/22/2023	Draft	Drafted Motion for Leave to Amend	3.8	400	1520	Alex Hagel
2/23/2023	Draft	Begin drafting discovery responses.	4.5	400	1800	Alex Hagel
2/23/2023	Preparation	Review Lara's emails and print relevant emails to PDF for initial disclosures	0.6	200	120	Kaitlin Leifur-Masterson
2/24/2023	Preparation	Review Lara's emails and print relevant emails to PDF for initial disclosures	1.4	200	280	Kaitlin Leifur-Masterson
2/28/2023	Preparation	Combine emails sent/received between LRH and OSPI into one document, remove metadata, and add bates nos.	1	400	400	Alex Hagel
3/2/2023	Meeting	Meeting w/ LRH, lan, and [REDACTED] re case status and next steps.	0.4	400	160	Alex Hagel
3/2/2023	Discovery	Continue drafting discovery responses to circulate to cocounsel.	3	400	1200	Alex Hagel
3/2/2023	Meeting	Meeting with lan & KLM & client	0.4	200	80	Kaitlin Leifur-Masterson
3/2/2023	Meeting	Attended weekly planning meeting with LRH, KLM, and client	0.4	400	160	Alex Hagel
3/2/2023	Meeting	Attended weekly planning meeting with LRH, KLM, and client	0.4	200	80	Kaitlin Leifur-Masterson
3/7/2023	Meeting	Discovery conference with lan & Brian Rowe from AGO	0.5	400	200	Alex Hagel
3/7/2023	Meeting	Attend meet and confer w/ LRH, lan and OC	0.4	400	160	Alex Hagel
3/7/2023	Meeting	Attend meet and confer w/ AH, lan and OC	0.4	200	80	Kaitlin Leifur-Masterson
3/9/2023	Meeting	Meeting w/ lan, [REDACTED] LRH, AFH re case status and next steps.	0.6	400	240	Alex Hagel
3/9/2023	Draft	Draft RFAs to OSPI and circulate to ALH and LRH for review.	1.6	400	640	Alex Hagel
3/9/2023	Discovery	prep & revise draft of RFAs & send to cocounsel.	0.8	400	320	Alex Hagel
3/9/2023	Meeting	Meeting w/ lan, [REDACTED] LRH, AFH re case status and next steps.	0.6	500	300	Lara Hruska
3/9/2023	Meeting	Meeting w/ lan, [REDACTED] LRH, AFH re case status and next steps.	0.6	200	120	Kaitlin Leifur-Masterson
3/10/2023	Discovery	Review and calendar d/l to respond to D's 2nd discovery requests	0.1	400	40	Alex Hagel
3/16/2023	Meeting	Meeting w/ AFH, lan, [REDACTED] re case status and next steps.	0.2	200	40	Kaitlin Leifur-Masterson
3/16/2023	Meeting	Meeting w/ KLM, lan, [REDACTED] re case status and next steps.	0.2	400	80	Alex Hagel
4/10/2023	Deposition	Attended deposition of SBCTC with ICRO	3	400	1200	Alex Hagel
4/11/2023	Correspondence/Email	Emails to/from co-counsel, clients re Order Granting leave to amend and new class discovery and cert d/l's.	0.5	400	200	Alex Hagel
4/11/2023	Review	Review Order Granting Leave to Amend and Order appointing magistrate for discovery issues.	0.2	400	80	Alex Hagel
4/13/2023	Meeting	Zoom meeting w/ lan, AFH, and clients re case status and next steps.	0.7	400	280	Alex Hagel
4/13/2023	Meeting	Zoom meeting w/ lan, AFH, and clients re case status and next steps.	0.7	200	140	Kaitlin Leifur-Masterson
4/17/2023	Review	Review discovery docs and update chron	3.8	200	760	Kaitlin Leifur-Masterson
4/18/2023	Review	Continue reviewing discovery docs and update chronology	0.9	400	360	Alex Hagel
4/18/2023	Draft	Drafting preliminary injunction motion - reviewing chron from KLM and other documents produced by SBCTC in anticipation of drafting analysis	4.5	400	1800	Alex Hagel
4/19/2023	Review	Review discovery docs and update chronology	0.4	200	80	Kaitlin Leifur-Masterson
4/20/2023	Draft	Drafting preliminary injunction - inclusion of ERK facts/analysis in argument section of brief	3.3	400	1320	Alex Hagel
4/20/2023	Draft	Drafting preliminary injunction - reviewing ERK and first and second circuit cases for inclusion in motion	3.3	400	1320	Alex Hagel

4/23/2023	Draft	Continuing to draft PI motion, time spent primarily reviewing discovery responses from SBCTC	2.6	400	1040	Alex Hagel
4/24/2023	Review	Continue reviewing docs produced in discovery and update chronology.	1.6	200	320	Kaitlin Leifur-Masterson
4/25/2023	Draft	Continuing to draft preliminary injunction motion; reviewing deposition transcript and incorporating testimony into motion	5.9	400	2360	Alex Hagel
4/26/2023	Review	Continue reviewing docs produced in discovery and update chronology.	1.9	200	380	Kaitlin Leifur-Masterson
4/26/2023	Discovery	Reviewing and emailing team regarding supplemental response from defendant	0.2	200	40	Kaitlin Leifur-Masterson
4/27/2023	Review	Continue reviewing docs produced by OSPI and update chronology.	1.8	200	360	Kaitlin Leifur-Masterson
4/27/2023	Meeting	Weekly team meeting	0.4	400	160	Alex Hagel
4/27/2023	Meeting	Weekly team meeting	0.4	500	200	Lara Hruska
4/27/2023	Meeting	Weekly team meeting	0.4	200	80	Kaitlin Leifur-Masterson
4/28/2023	Review	Continue reviewing OSPI docs and update chronology	4.2	400	1680	Kaitlin Leifur-Masterson
		Continue reviewing docs produced by OSPI and update chronology				
5/1/2023	Review	Continue reviewing OSPI docs and update chronology.	0.9	200	180	Kaitlin Leifur-Masterson
5/3/2023	Review	Continue reviewing OSPI docs and update chronology.	1.5	200	300	Kaitlin Leifur-Masterson
5/4/2023	Phone Call	Phone call w/ AFH re Drafting Decl of Ian Crosby	0.1	200	20	Kaitlin Leifur-Masterson
		Draft declaration of Ian Crosby iso Mtn for Provisional Certification and Prelim Injunction.				
5/4/2023	Draft	Certification and Prelim Injunction.	2.9	400	1160	Alex Hagel
5/4/2023	Meeting	Weekly meeting	0.3	400	120	Alex Hagel
5/4/2023	Correspondence	Emails with KLM re: ICRO declaration	0.2	400	80	Alex Hagel
5/4/2023	Meeting	Weekly meeting	0.3	500	150	Lara Hruska
5/4/2023	Meeting	Weekly meeting	0.3	200	60	Kaitlin Leifur-Masterson
		Continue reviewing docs produced in response to discovery requests and update chron				
5/5/2023	Review	Review discover and update chronology	2.1	200	420	Kaitlin Leifur-Masterson
5/8/2023	Review	Review discover and update chronology	1	200	200	Kaitlin Leifur-Masterson
5/8/2023	Draft	Drafting LRH declaration re: Cedar Law	2.8	400	1120	Alex Hagel
5/8/2023	Draft	Drafting EA mother's declaration for motion	3	400	1200	Alex Hagel
5/8/2023	Draft	Review declaration re: Cedar Law	0.5	500	250	Lara Hruska
		Review docs produced in discovery and update chronology.				
5/9/2023	Review	Drafting my declaration for motion, including time gathering exhibits	1.6	200	320	Kaitlin Leifur-Masterson
		Continue reviewing docs produced in discovery and update chronology.				
5/9/2023	Draft	Review pleadings & checkin with client and cocounsel re FAPE violations & provisional class certification.	3.4	400	1360	Alex Hagel
5/10/2023	Review	Review pleadings & checkin with client and cocounsel re FAPE violations & provisional class certification.	1.8	200	360	Kaitlin Leifur-Masterson
5/10/2023	Review	Review pleadings & checkin with client and cocounsel re FAPE violations & provisional class certification.	1	400	400	Alex Hagel
		Drafting discovery responses to second interrogatories				
5/10/2023	Draft	Correspondence with co-counsel/clients regarding order granting leave to amend	3.6	400	1440	Alex Hagel
5/11/2023	Correspondence/Email	Continue reviewing discovery and update chronology	0.3	400	120	Alex Hagel
5/11/2023	Review	Circulate task list	3.3	200	660	Kaitlin Leifur-Masterson
5/11/2023	Correspondence/Email	Circulate task list	0.1	200	20	Kaitlin Leifur-Masterson
		Meeting w/ KLM, AFH, Ian re case status and next steps				
5/11/2023	Meeting	Reviewing P.A. provided client files prior to disclosure to OC	0.3	400	120	Alex Hagel
5/11/2023	Review	Complete review of OSPI discovery docs and chron.	4.5	400	1800	Alex Hagel
5/11/2023	Draft	Drafting supplemental discovery responses	1.3	400	520	Alex Hagel
		Meeting w/ KLM, AFH, Ian re case status and next steps				
5/11/2023	Meeting	Complete review of OSPI discovery docs and chron.	0.3	400	120	Kaitlin Leifur-Masterson
5/12/2023	Review	Circulate to Ian, AFH, LRH.	3.7	200	740	Kaitlin Leifur-Masterson
		Coordinating supplemental discovery responses for PA				
5/12/2023	Discovery	Coordinating supplemental discovery responses for PA	3.5	400	1400	Alex Hagel
		Correspondence with co-counsel regarding inadvertent disclosure, including research into ethical obligations				
5/12/2023	Correspondence	Meeting w/ LRH, AFH, Ian, clients re case status and next steps	0.5	400	200	Alex Hagel
		Attend client meeting re next steps.				
5/18/2023	Meeting	Attend client meeting re next steps.	0.2	400	80	Alex Hagel
5/18/2023	Meeting	Review ██████ Bates no issue	0.4	400	160	Alex Hagel
5/18/2023	Review	Investigate & address unopenable redacted files.	0.9	400	360	Alex Hagel
5/23/2023	Review	Meeting w/ Ian, AFH, ██████ re case status and next steps.	1	400	400	Alex Hagel
5/25/2023	Meeting	Weekly meeting with clients, ICRO, and KLM	0.2	400	80	Alex Hagel
5/25/2023	Meeting	Weekly meeting with clients, ICRO, and KLM	0.3	400	120	Alex Hagel

5/31/2023	Draft	Draft Stipulated Notice of Motion Renoted: Plaintiffs Motion for Provisional Certification and a Preliminary Injunction	0.5	400	200	Alex Hagel
5/31/2023	Draft	Communicate with opposing counsel & cocounsel - draft unopposed motion to renote in light of AFH medical issue.	1.5	400	600	Alex Hagel
5/31/2023	Draft	Draft Proposed Order Renoting Plaintiffs's Motion for Provisional Certification and a Preliminary Injunction	0.2	400	80	Alex Hagel
6/5/2023	Draft	Reviewing Response brief and starting to outline motion based on brief. Review of brief involved research of cited cases	5.3	400	2120	Alex Hagel
6/6/2023	Draft	Drafting reply brief - drafted likelihood of success portion and started on drafting EA graduation response	7.1	400	2840	Alex Hagel
6/8/2023	Meeting	Meeting w/ LRH, AFH, Ian, the [REDACTED] re case status and next steps. Recap sent to LRH.	0.4	400	160	Alex Hagel
6/8/2023	Meeting	Weekly strategy meeting, discussed reply brief	0.4	400	160	Alex Hagel
6/8/2023	Correspondence/Email	Correspondence with Cedar team regarding status of reply	0.2	400	80	Alex Hagel
6/8/2023	Meeting	Meeting w/ LRH, AFH, Ian, the [REDACTED] re case status and next steps. Recap sent to LRH.	0.4	500	200	Lara Hruska
6/8/2023	Meeting	Meeting w/ LRH, AFH, Ian, the [REDACTED] re case status and next steps. Recap sent to LRH.	0.4	200	80	Kaitlin Leifur-Masterson
6/9/2023	Discovery	Reviewing discovery completed by KLM	3.5	400	1400	Alex Hagel
6/13/2023	Review	Review, save D's Notice of Intent to File Surreply and counsel's correspondence re same.	0.1	400	40	Alex Hagel
6/14/2023	Review	Read, review, and save D's Surreply in Opp to Ps' MSJ	0.1	400	40	Alex Hagel
6/20/2023	Discovery	Reviewing Discovery progress from KLM in anticipation of drafting motion for class certification	2.9	400	1160	Alex Hagel
6/22/2023	Meeting	Attend weekly meeting w/ KLM.	0.2	400	80	Alex Hagel
6/22/2023	Meeting	Attend weekly meeting w/ AFH.	0.2	200	40	Kaitlin Leifur-Masterson
6/23/2023	Draft	Starting to draft motion for class certification - initial research and resource gathering	3.8	400	1520	Alex Hagel
6/28/2023	Draft	Drafting Motion for class certification - drafting 23(b) portions	7.2	400	2880	Alex Hagel
6/29/2023	Draft	Continuing to draft certification motion, includes time spent reviewing discovery hot docs	6.5	400	2600	Alex Hagel
7/6/2023	Meeting	Weekly Zoom w/ Ian, Teresa, [REDACTED] LRH, AFH re case status and next steps.	0.4	400	160	Alex Hagel
7/6/2023	Correspondence	With cocounsel & client re regular high school diploma issue	0.5	400	200	Alex Hagel
7/6/2023	Research	Research regarding diploma pathways in WA	4.1	400	1640	Alex Hagel
7/6/2023	Meeting	Weekly Zoom w/ Ian, Teresa, [REDACTED] LRH, AFH re case status and next steps.	0.4	500	200	Lara Hruska
7/6/2023	Meeting	Weekly Zoom w/ Ian, Teresa, [REDACTED] LRH, AFH re case status and next steps.	0.4	200	80	Kaitlin Leifur-Masterson
7/7/2023	Review	Read and review Motion for Class Certification	0.3	400	120	Alex Hagel
7/7/2023	Draft	Continuing to edit Motion for certification based on feed back, and including citations to record	4.2	400	1680	Alex Hagel
7/10/2023	Discovery	Reviewed new documents provided by client prior to disclosure	1.3	200	260	Kaitlin Leifur-Masterson
7/10/2023	Discovery	Reviewing Discovery provided by client prior to disclosure	2.6	200	520	Kaitlin Leifur-Masterson
7/10/2023	Draft	Coordinating final versions for motion, declaration and exhibits	4.5	400	1800	Alex Hagel
7/11/2023	Review	Reviewing Court order re: surreply	0.2	400	80	Alex Hagel
7/13/2023	Meeting	Meeting w/ AFH, LRH, Ian, and the [REDACTED] re case status and next steps.	0.4	200	80	Kaitlin Leifur-Masterson
7/13/2023	Meeting	Meeting w/ AFH, LRH, Ian, and the [REDACTED] re case status and next steps.	0.4	400	160	Alex Hagel
7/13/2023	Meeting	Meeting w/ AFH, LRH, Ian, and the [REDACTED] re case status and next steps.	0.4	500	200	Lara Hruska
7/18/2023	Review	Review D's Supplemental Briefing and emails from counsel.	0.2	400	80	Alex Hagel
7/20/2023	Meeting	Meeting w/ LRH, AFH, Ian, [REDACTED] the [REDACTED] re case status and next steps	0.6	400	240	Alex Hagel
7/20/2023	Meeting	Team strategy checkin	0.7	400	280	Alex Hagel
7/20/2023	Research	Zoom with attorney from prior diploma cases & review other decisions including OCR guidance & OAH pleadings on regular diploma issue.	1.5	400	600	Alex Hagel

7/20/2023	Phone Call	morning call with clients re concerns about litigation strategy	0.2	400	80	Alex Hagel
7/20/2023	Phone Call	Afternoon call with client	0.2	400	80	Alex Hagel
7/20/2023	Meeting	Meeting w/ LRH, AFH, Ian, [REDACTED] the [REDACTED] re case status and next steps	0.6	200	120	Kaitlin Leifur-Masterson
7/20/2023	Meeting	Meeting w/ LRH, AFH, Ian, [REDACTED] the [REDACTED] re case status and next steps	0.6	500	300	Lara Hruska
7/21/2023	Review	Review minute order, response d/l's, and correspondence re same.	0.1	400	40	Alex Hagel
7/24/2023	Draft	Starting to draft initial reply briefing based on anticipated responses per ICRO	5.2	400	2080	Alex Hagel
7/27/2023	Meeting	Weekly team meeting w/ the [REDACTED] T.D., Ian, and AFH re case status and next steps.	0.4	400	160	Alex Hagel
7/27/2023	Review	Review [REDACTED] Selah records and update chronology Misc. correspondence with clients/co-counsel regarding due process hearing request	1	200	200	Kaitlin Leifur-Masterson
7/27/2023	Correspondence/Email	Reviewing discovery work from KLM	0.3	400	120	Alex Hagel
7/27/2023	Discovery	Review OSPI response on motion to certify class & communicate with clients and cocounsel re same.	4.1	400	1640	Alex Hagel
7/31/2023	Review	Strategy meeting with AFH & KLM & cocounsel	1	400	400	Alex Hagel
8/1/2023	Meeting	Meeting w/ LRH, AFH, Ian, and [REDACTED] re case status and brief writing.	0.5	500	250	Lara Hruska
8/1/2023	Meeting	Starting to draft portions of reply to MCC - includes research on exhaustion requirements in prior cases	0.5	400	200	Alex Hagel
8/1/2023	Draft	Strategy meeting with LRH, AFH & KLM & cocounsel	3	400	1200	Alex Hagel
8/1/2023	Meeting	Continuing to draft my assigned portions of the reply brief - namely typicality and exhaustion. Includes time researching relevant cases	0.5	200	100	Kaitlin Leifur-Masterson
8/2/2023	Draft	Continuing to draft reply - research and drafted section on statute of limitations	6.5	400	2600	Alex Hagel
8/3/2023	Draft	Review new paperwork from district re aging-out and correspond with client & cocounsel re same to inform reply.	4.5	400	1800	Alex Hagel
8/3/2023	Review	Additional edits to reply brief	1	400	400	Alex Hagel
8/4/2023	Draft	Read, review, and save case filing	2.5	400	1000	Alex Hagel
8/4/2023	Review	Call with Alex re status of DPHR re declaration for class action.	0.6	200	120	Kaitlin Leifur-Masterson
8/7/2023	Phone Call	Communication with Ian re settlement of DPHR in advance of reply for class action.	0.2	200	40	Kaitlin Leifur-Masterson
8/7/2023	Correspondence	Multiple emails & call with client re diploma in 75 days.	0.3	400	120	Alex Hagel
8/7/2023	Correspondence	Review discovery and pull spreadsheet of OAH hearing dates	0.5	400	200	Alex Hagel
8/7/2023	Review	Drafting response to brief regarding E.A.'s graduation status	0.3	200	60	Kaitlin Leifur-Masterson
8/7/2023	Draft	Drafting declaration regarding IDEA process	4.1	400	1640	Alex Hagel
8/7/2023	Draft	Drafting updated version of Response brief regarding graduation status	2.1	400	840	Alex Hagel
8/8/2023	Draft	Meeting w/ [REDACTED] [REDACTED] AFH, Ian, [REDACTED] re case status and next steps	3.7	400	1480	Alex Hagel
8/10/2023	Meeting	Review final pleadings & debrief with AFH	0.2	400	80	Alex Hagel
8/14/2023	Review	Review supplemental briefing re Motion for Class Cert.	1	500	500	Lara Hruska
8/15/2023	Review	Weekly meeting w/ co-counsel, clients re case status and next steps	0.5	400	200	Alex Hagel
8/31/2023	Meeting	Weekly meeting w/ co-counsel, clients re case status and next steps	0.4	200	80	Kaitlin Leifur-Masterson
8/31/2023	Meeting	Reviewing Order denying motion	0.4	500	200	Lara Hruska
8/31/2023	Review	Drafted Motion for Reconsideration	1.5	400	600	Alex Hagel
8/31/2023	Draft	Weekly team meeting	3.7	400	1480	Alex Hagel
8/31/2023	Meeting	Drafting Motion for expedited hearing	0.4	400	160	Alex Hagel
9/1/2023	Draft	Review emails re appellate filing and briefing	8.6	400	3440	Alex Hagel
9/5/2023	Correspondence/Email	Drafting 9th Circuit brief - statement of case, and section regarding mandatory injunction standard	0.1	400	40	Alex Hagel
9/5/2023	Draft	Continuing to work on appellate brief - coordinating citations, researching and drafting section on types of injunctions	7.4	400	2960	Alex Hagel
9/6/2023	Draft	Drafting mediation questionnaire	6	400	2400	Alex Hagel
9/6/2023	Draft	Weekly meeting; ninth circuit appeal strategy and recap for client	1	200	200	Kaitlin Leifur-Masterson
9/7/2023	Meeting	Weekly meeting; ninth circuit appeal strategy	0.5	400	200	Alex Hagel
9/7/2023	Meeting		0.5	400	200	Alex Hagel

9/8/2023	Review	Reviewing Court order on responding to motion for reconsideration	1	400	400	Alex Hagel
9/11/2023	Draft	Drafting response to request for briefing from Court regarding authority to entertain mot. for recon.	2.5	400	1000	Alex Hagel
9/12/2023	Correspondence	Correspondence with cocounsel/clients regarding Order re: providing additional information to court Meeting w/ AFH, LRH, the [REDACTED] re case status and next steps	0.3	400	120	Alex Hagel
9/14/2023	Meeting	Meeting w/ AFH, KLM re case status and next steps	0.2	400	80	Alex Hagel
9/14/2023	Meeting	Review briefing on Mtn for Reconsideration and correspondence re same.	0.2	400	80	Alex Hagel
9/20/2023	Review	Listen to oral argument on Pl w/ AFH	1	400	400	Alex Hagel
9/26/2023	Hearing/Court	Listened to hearing on Plaintiffs motion for reconsideration	1	400	400	Alex Hagel
9/26/2023	Hearing/Court	Reviewing discovery/hot docs provided by KLM	1	400	400	Alex Hagel
9/27/2023	Discovery	Weekly team meeting w/ AFH, Ian, TD, [REDACTED]	8.7	400	3480	Alex Hagel
9/28/2023	Meeting	Reviewing Order denying preliminary injunction	0.4	400	160	Alex Hagel
9/29/2023	Review	Communicating with team regarding next steps after motion was denied	1	400	400	Alex Hagel
9/29/2023	Correspondence	Beginning to draft thoughts on errors in court decision for use in appeal	0.5	400	200	Alex Hagel
9/29/2023	Draft	Brief meeting w/ the [REDACTED] waited for counsel, then decided to just meet next week	3.5	400	1400	Alex Hagel
10/5/2023	Meeting	Brief meeting w/ the [REDACTED]	0.1	400	40	Alex Hagel
10/5/2023	Meeting	Correspondence with opposing counsel regarding deadlines	0.1	400	40	Alex Hagel
10/9/2023	Correspondence	Drafting appellant opening brief	0.1	400	40	Alex Hagel
10/16/2023	Draft	Drafting appellate brief	8.4	400	3360	Alex Hagel
10/18/2023	Draft	Meeting w/ Ian, [REDACTED] TD, AFH	9.9	400	3960	Alex Hagel
10/19/2023	Meeting	Continuing to draft appellant opening brief	0.2	400	80	Alex Hagel
10/19/2023	Draft	Final edits of opening brief before	8.9	400	3560	Alex Hagel
10/20/2023	Draft	Meeting w/ AFH, LRH, Ian, [REDACTED] the [REDACTED] re case status and next steps	1.2	400	480	Alex Hagel
10/26/2023	Meeting	Continued drafting of Amended Opening Brief - includes additional research regarding stay-put implications Meeting w/ AFH, Ian, [REDACTED] and the [REDACTED] re case status and next steps	0.3	400	120	Alex Hagel
10/26/2023	Draft	Reviewing Answering Brief and initial research of cited cases	8.5	400	3400	Alex Hagel
11/9/2023	Meeting	Starting to draft reply brief - includes time spent reviewing OSPI response and district court order	0.2	400	80	Alex Hagel
11/17/2023	Review	Continuing to draft Reply	3.5	400	1400	Alex Hagel
11/18/2023	Draft	Continuing to draft reply - reviewing other sections of brief and editing at necessary	5.4	400	2160	Alex Hagel
11/20/2023	Draft	Finalizing draft with team - drafting mandatory injunction section, and reviewing multiple times for edits	7.6	400	3040	Alex Hagel
11/21/2023	Draft	Meeting w/ Ian, the [REDACTED] re case status and next steps	4.7	400	1880	Alex Hagel
11/22/2023	Draft	With clients and team re: oral argument date	3.9	400	1560	Alex Hagel
11/30/2023	Meeting	Review 9COA scheduling notice, guidelines	0.2	400	80	Alex Hagel
1/15/2024	Correspondence/Email	With clients and counsel re: oral argument schedule, injunction	0.2	500	100	Lara Hruska
1/16/2024	Review	Email and follow up chat with G Crowder re: testimony	0.1	200	20	Kaitlin Leifur-Masterson
1/16/2024	Review	Email clients re: Settlement offer and next steps, follow up with SD counsel	0.2	400	80	Alex Hagel
1/16/2024	Correspondence/Email	Mult corr re: declined settlement, follow up meeting, strategy	0.2	400	80	Alex Hagel
1/25/2024	Correspondence	Follow up re: declined settlement and next steps with team	0.3	400	120	Alex Hagel
1/25/2024	Correspondence	Email to SD counsel re: offer and continuance	0.1	500	50	Lara Hruska
2/12/2024	Correspondence	Conducted updated research on preliminary injunction appeal prior to 9th cir. argument	0.1	400	40	Alex Hagel
2/13/2024	Correspondence	Reply to client questions re settlements	3.7	400	1480	Alex Hagel
2/13/2024	Correspondence	Follow up with SD counsel re: offer and continuance	0.2	500	100	Lara Hruska
2/15/2024	Research	With LRH and co-counsel re: OOO message from L Baisch and next steps	0.1	400	40	Alex Hagel
2/15/2024	Correspondence	Response to SD counsel re: hearing, fees, next steps	0.1	400	40	Alex Hagel
2/21/2024	Correspondence	With team and clients re: latest offer, reimbursements	0.2	500	100	Lara Hruska
2/22/2024	Correspondence		0.1	500	50	Lara Hruska
2/22/2024	Correspondence					
2/23/2024	Correspondence					

2/27/2024	Meeting	Zoom with clients re settlement demand & email co-counsel re terms	0.3	400	120	Alex Hagel
2/27/2024	Meeting	Zoom with clients re settlement demand & email co-counsel re terms	0.3	500	150	Lara Hruska
2/27/2024	Correspondence	Mult corr with team, clients, SD counsel re: meeting, fees, settlement agreement	0.5	500	250	Lara Hruska
2/28/2024	Correspondence	Mult corr re: draft agreement	0.2	500	100	Lara Hruska
3/4/2024	Review	Review waiver language re maintaining standing for class action.	1	400	400	Alex Hagel
3/4/2024	Correspondence	Mult corr with clients and team explaining draft agreement, waiver	0.5	500	250	Lara Hruska
3/5/2024	Correspondence	Email with team and clients re: waiver	0.1	400	40	Alex Hagel
3/5/2024	Correspondence	With client re: appeal, dismissal, questions on eligibility for relief	0.1	500	50	Lara Hruska
3/6/2024	Correspondence	Mult corr with team and SD counsel re: draft language, not waiving eligibility for relief	0.3	500	150	Lara Hruska
3/6/2024	Correspondence	With L Baisch re: concerns of class action, current settlement offer	0.2	500	100	Lara Hruska
3/7/2024	Correspondence	Correspondence with co-counsel regarding release language	1.4	400	560	Alex Hagel
3/7/2024	Correspondence	With AH re: phrasing of agreement	0.1	500	50	Lara Hruska
3/8/2024	Research	Research regarding SEA liability and drafting email to co-counsel	3.5	400	1400	Alex Hagel
3/8/2024	Correspondence/Email	With L Baisch and team re: impasse in proposed language	0.3	500	150	Lara Hruska
3/8/2024	Correspondence/Email	With co-counsel re: liability, settlement	0.1	500	50	Lara Hruska
3/11/2024	Correspondence	Multiple emails with team and L Baisch re draft language and preservation of claims/liability	0.4	500	200	Lara Hruska
3/12/2024	Review	Review waiver language with cocounsel & clients re OSPI v Selah.	1	400	400	Alex Hagel
3/13/2024	Prehearing	Attend prehearing conference	0.5	400	200	Alex Hagel
3/19/2024	Review	Reviewing briefing/exhibits in preparation for moot.				
3/20/2024	Preparation	Drafting potential questions etc.	4.5	400	1800	Alex Hagel
3/20/2024	Preparation	Preparation session for Ninth Circuit argument	1	400	400	Alex Hagel
3/20/2024	Meeting	Attend moot for COA argument	0.4	200	80	Kaitlin Leifur-Masterson
3/20/2024	Meeting	Attend Ian's moot for COA argument	0.4	400	160	Alex Hagel
3/20/2024	Meeting	Attend moot for COA argument	0.4	500	200	Lara Hruska
3/24/2024	Meeting	Final prep meeting for ICRO's argument	1	400	400	Alex Hagel
3/25/2024	Correspondence/Email	Emails re oral argument	0.3	400	120	Alex Hagel
3/25/2024	Hearing/Court	Attended Ninth Circuit oral argument	2.5	400	1000	Alex Hagel
3/25/2024	Travel	travel to and from Court house	1.2	400	480	Alex Hagel
5/21/2024	Research	Research into underlying facts of ERK re: fees	1.5	400	600	Alex Hagel
5/22/2024	Review	Reviewing Ninth Circuit Decision	2.5	400	1000	Alex Hagel
5/22/2024	Meeting	Meeting with LRH and KLM regarding media response	0.8	400	320	Alex Hagel
5/22/2024	Review	Reviewing Ninth Circuit Decision	0.9	500	450	Lara Hruska
5/22/2024	Correspondence	Call with TMD re next steps	1	500	500	Lara Hruska
5/22/2024	Correspondence	With clients and team re: press release	0.2	500	100	Lara Hruska
5/23/2024	Phone Call	Phone call with Seattle Times regarding Ninth Circuit victory	0.5	400	200	Alex Hagel
5/28/2024	Draft	Starting to draft motions for issuance of injunction, rule on class certification, and summary judgment	3.2	400	1280	Alex Hagel
5/28/2024	Correspondence	Clarifications with team re doc for preliminary injunction, ruling, summary judgment?	0.2	400	80	Alex Hagel
5/30/2024	Correspondence	Multiple emails re SPS productions	0.3	400	120	Alex Hagel
6/3/2024	Correspondence	Review and respond to emails from cocounsel proposal and meeting	0.1	500	50	Lara Hruska
6/4/2024	Meeting	Team meeting to debrief with ██████████	1	500	500	Lara Hruska
6/4/2024	Meeting	Team meeting regarding resolution	1	400	400	Alex Hagel
6/4/2024	Correspondence/Email	Email with M Wacker re case, special master role	0.3	500	150	Lara Hruska
6/5/2024	Research	Research into Hawaii and other state's settlements	2.4	400	960	Alex Hagel
6/5/2024	Correspondence/Email	With JJ Law re: case cite	0.1	500	50	Lara Hruska
6/5/2024	Correspondence	With co-counsel and clients re: Draft email to Rowe	0.2	500	100	Lara Hruska
6/6/2024	Correspondence	Extensive correspondence with client re terms.	1	500	500	Lara Hruska
6/6/2024	Correspondence	Multiple correspondence with LRH and co-counsel re Draft Rowe email, terms	0.3	400	120	Alex Hagel
6/6/2024	Correspondence	Continued emails with co-counsel re: Draft email to Rowe	0.2	500	100	Lara Hruska
6/7/2024	Correspondence/Email	Review correspondence between R Pope and B Rowe, re statistics, follow up with team with excerpts	0.3	500	150	Lara Hruska
6/9/2024	Phone Call	Multiple calls with client re terms.	0.4	500	200	Lara Hruska

6/9/2024	Correspondence	Emails with AH and client re: term sheet, clarification	0.1	500	50	Lara Hruska
6/9/2024	Phone Call	Client call with LRH	0.2	400	80	Alex Hagel
6/10/2024	Correspondence	With client re: school expenses	0.2	500	100	Lara Hruska
6/10/2024	Correspondence	Review and respond to term sheet emails with feedback	0.3	400	120	Alex Hagel
6/11/2024	Review	Review draft FAQs from AFH	0.1	200	20	Kaitlin Leifur-Masterson
6/11/2024	Draft	Drafting potential Q&A for clients regarding class action status	4.3	400	1720	Alex Hagel
6/12/2024	Correspondence	Correspondence with client/co-counsel regarding resolution efforts	0.6	400	240	Alex Hagel
6/12/2024	Correspondence	Review and respond to client feedback on Draft FAQ	0.1	500	50	Lara Hruska
6/13/2024	Review	Reviewing OSPI Q-and-A	1.2	400	480	Alex Hagel
6/13/2024	Review	Reviewing most recent OSPI guidance	1.9	400	760	Alex Hagel
6/13/2024	Correspondence	Reviewing correspondence between client and Counsel	0.5	400	200	Alex Hagel
6/13/2024	Correspondence	Follow up and response to client re Draft FAQs re IDEA case	0.1	400	40	Alex Hagel
6/17/2024	Meeting	Meeting with Ian & Alex & TMD re class definition.	1	500	500	Lara Hruska
6/17/2024	Meeting	Strategy meeting with team	1	400	400	Alex Hagel
6/17/2024	Correspondence	With team re: LWSD issuing PWNs	0.1	500	50	Lara Hruska
6/17/2024	Correspondence	With team re: student's summary of performance	0.1	400	40	Alex Hagel
6/18/2024	Draft	Drafting joint status report	3.5	400	1400	Alex Hagel
6/18/2024	Correspondence	Reviewing correspondence with clients and co-counsel	0.5	400	200	Alex Hagel
6/18/2024	Correspondence	Mult corr with team re: doc draft and clarification of language surrounding continuing need for education	0.2	400	80	Alex Hagel
6/18/2024	Correspondence	Mult corr with co-counsel re: proposed class, revised class definition, demands	0.4	400	160	Alex Hagel
6/19/2024	Phone Call	Call with client re status	0.4	500	200	Lara Hruska
6/20/2024	Correspondence	propose settlement mediation format to co-counsel, review and respond to feedback	0.3	500	150	Lara Hruska
6/20/2024	Correspondence	Extensive correspondence with N Farley and team re mediation and mediator, special master, scheduling	0.5	500	250	Lara Hruska
6/20/2024	Correspondence	Multiple emails with co-counsel re joint status report, drafting process, feedback and revisions	0.5	400	200	Alex Hagel
6/20/2024	Correspondence	With J Harris re availability for mediation	0.1	500	50	Lara Hruska
6/25/2024	Research	Researching class notice vs. class definition distinctions	2.4	400	960	Alex Hagel
6/26/2024	Correspondence/Email	With co-counsel, team and clients re Settlement Framework	0.3	500	150	Lara Hruska
6/26/2024	Correspondence/Email	re: settlement framework, attached scheduling order	0.3	400	120	Alex Hagel
6/26/2024	Correspondence/Email	Follow up with client and AH re settlement framework and mediator	0.2	500	100	Lara Hruska
6/26/2024	Correspondence/Email	respond to team comms re framework with continuance order	0.2	500	100	Lara Hruska
7/1/2024	Correspondence/Email	Review and respond to steam comms re mediation	0.1	400	40	Alex Hagel
7/3/2024	Correspondence	With client and co-counsel re: settlement offer	0.2	500	100	Lara Hruska
7/3/2024	Correspondence	With team Re: settlement offer and IEP comp. ed. decision, community complaint	0.2	400	80	Alex Hagel
7/5/2024	Review	Reviewing mediator letter	0.2	400	80	Alex Hagel
7/8/2024	Meeting	Meeting with Ian & Alex & [REDACTED] re offer	0.8	500	400	Lara Hruska
7/8/2024	Meeting	Meeting with Ian & Alex & [REDACTED] re offer	0.8	500	400	Alex Hagel
7/8/2024	Correspondence	Review correspondence between co-counsel and B Rowe and provide feedback on draft reply	0.4	400	160	Alex Hagel
7/8/2024	Correspondence	Review settlement framework comms and provide feedback	0.3	500	150	Lara Hruska
7/9/2024	Correspondence	With team re confirmation of remedies available for IEP team comp ed disputes	0.1	500	50	Lara Hruska
7/10/2024	Review	Review district court's order granting prelim injunction	0.5	200	100	Kaitlin Leifur-Masterson
7/10/2024	Review	Review preliminary injunction & debrief with AFH & TMD re impact on settlement.	1.5	500	750	Lara Hruska
7/12/2024	Correspondence	Review proposed letter from co-counsel and provide feedback re exit codes, comp ed, reimbursement	0.3	500	150	Lara Hruska
7/12/2024	Correspondence	Review proposed letter from co-counsel	0.2	400	80	Alex Hagel
7/15/2024	Correspondence	Review client and co-counsel emails, Respond to co-counsel email re: OSPI liability	0.2	500	100	Lara Hruska
7/15/2024	Correspondence	Re: request for separate SGAL funding for settlements	0.1	500	50	Lara Hruska
7/17/2024	Correspondence	Review emails and docs for finalized agreement and follow up with team, question re compliance	0.3	400	120	Alex Hagel

7/17/2024	Correspondence	With co-counsel re resolution, concerns for student families' recourse	0.3	500	150	Lara Hruska
7/17/2024	Correspondence	Respond to AH question re comploiance, community complaint	0.1	500	50	Lara Hruska
7/18/2024	Correspondence	Review proposed response and follow up with permission to share client names	0.2	400	80	Alex Hagel
7/18/2024	Correspondence	Review team comms re acceptance of edits, mediation, respond to request for motion to approve draft	0.2	400	80	Alex Hagel
7/19/2024	Correspondence	Questions to team re: motion to approve	0.1	400	40	Alex Hagel
7/23/2024	Draft	Drafting motion for class action settlement approval	4.1	400	1640	Alex Hagel
7/24/2024	Research	Research re: Class action settlement processes and case law	3.5	400	1400	Alex Hagel
7/24/2024	Draft	Starting to draft class action settlement motion	3.2	400	1280	Alex Hagel
7/31/2024	Draft	Finalizing draft motion for preliminary approval	8.2	400	3280	Alex Hagel
8/2/2024	Correspondence	Texts/emails to/from LRH re status of settlement discussions, rev'w motion and draft settlement	0.3	200		60 Kaitlin Leifur-Masterson
8/6/2024	Review	Review Motion for Prelim Approval of Class Settlement, Decl of AFH, and proposed order	0.3	200	60	Kaitlin Leifur-Masterson
8/22/2024		EXPENSE PACER Access over lifetime of case	1	450		450 Alex Hagel
8/30/2024	Draft	Draft DPHR to preserve claims in light of ongoing settlement effort.	1	500		500 Lara Hruska
9/5/2024	Draft	Drafting new notification plan for class action settlement, includes reviewing samples and past best practices	7.5	400	3000	Alex Hagel
9/10/2024	Correspondence/Email	Arrange continuances in both LWSD & SPS matters with OAH and opposing counsel.	1.5	500		750 Lara Hruska
10/14/2024	Correspondence	Correspondence with team regarding possible case of OSPi non-compliance with injunction	0.2	400	80	Alex Hagel
10/22/2024	Draft	Revising Motion for preliminary approval based on district court denial and communication with OC regarding amendments to agreement	2.1	400		840 Alex Hagel
12/13/2024	Phone Call	Phone call with class member regarding notification letter	0.3	400	120	Alex Hagel
12/16/2024	Correspondence	Responding to email with class member regarding notification letter	0.2	400	80	Alex Hagel
1/2/2024	Draft	Drafting Motion for Final Approval	2.8	400	1120	Alex Hagel
1/4/2024	Draft	Drafting Motion for Attorneys Fees and Costs	5.7	400	2280	Alex Hagel
		TOTAL	523.7		198570	

Exhibit 2

Billing Rate

Table 35 presents the 2021 hourly billing rate for private practice lawyers, regardless of level of employment (i.e., full-time, part-time by choice, and part-time due to lack of legal work). The mean hourly rate was \$344 statewide, and ranged from \$269 to \$401 regionally.

Table 35: 2021 Hourly Billing Rate – Private Practice

	Oregon (n=1,613)	Downtown Portland (n=597)	Tri-County (n=500)	Upper Willamette Valley (n=151)	Lower Willamette Valley (n=134)	Southern Oregon (n=69)	Eastern Oregon (n=122)	Oregon Coast (n=40)
Mean Hourly Rate	\$344	\$401	\$329	\$293	\$306	\$281	\$288	\$269
Median Hourly Rate	\$325	\$380	\$325	\$300	\$300	\$270	\$288	\$250
Low Hourly Rate	\$75	\$125	\$75	\$105	\$75	\$100	\$75	\$175
95 th Percentile	\$575	\$686	\$500	\$415	\$459	\$405	\$399	\$399
High Hourly Rate	\$1,375	\$1,150	\$1,375	\$500	\$754	\$600	\$500	\$650

Q14: When you charged on an hourly basis, what was your usual billing rate per hour in 2021?

Q6: Which type of employment represented 50% or more of your practice as of 12/31/2021? [*private practice only*]

Total Years Admitted to Practice

Table 36 presents the 2021 hourly bill rate data by total years admitted to practice for all private practice lawyers, regardless of level of employment. Statewide, the mean hourly billing rate increased as the number of years admitted to practice increased (aside from a small decrease in the 16-20 year range), reaching a mean of \$384 for lawyers admitted to practice for Over 30 Years. Slight variations occurred regionally.

Table 36: 2021 Hourly Billing Rate by Total Years Admitted to Practice – Private Practice

	Oregon (n=148)	Downtown Portland (n=69)	Tri-County (n=32)	Upper Willamette Valley (n=15)	Lower Willamette Valley (n=12)	Southern Oregon (n=6)	Eastern Oregon (n=12)	Oregon Coast (n=n/a)
0-3 Years								
Mean Rate	\$273	\$310	\$257	\$232	\$223	\$194	\$255	n/a
Median Rate	\$250	\$300	\$250	\$225	\$230	\$180	\$243	n/a
95 th Percentile	\$459	\$538	\$425	n/a	n/a	n/a	n/a	n/a
	Oregon (n=165)	Downtown Portland (n=62)	Tri-County (n=48)	Upper Willamette Valley (n=20)	Lower Willamette Valley (n=13)	Southern Oregon (n=10)	Eastern Oregon (n=11)	Oregon Coast (n=n/a)
4-6 Years								
Mean Rate	\$285	\$312	\$281	\$276	\$234	\$241	\$276	n/a
Median Rate	\$275	\$308	\$263	\$250	\$230	\$250	\$295	n/a
95 th Percentile	\$468	\$495	\$464	\$498	n/a	n/a	n/a	n/a
	Oregon (n=160)	Downtown Portland (n=58)	Tri-County (n=51)	Upper Willamette Valley (n=18)	Lower Willamette Valley (n=14)	Southern Oregon (n=n/a)	Eastern Oregon (n=14)	Oregon Coast (n=n/a)
7-9 Years								
Mean Rate	\$308	\$339	\$316	\$272	\$261	n/a	\$264	n/a
Median Rate	\$300	\$350	\$325	\$275	\$245	n/a	\$275	n/a
95 th Percentile	\$449	\$486	\$450	n/a	n/a	n/a	n/a	n/a
	Oregon (n=173)	Downtown Portland (n=72)	Tri-County (n=51)	Upper Willamette Valley (n=17)	Lower Willamette Valley (n=11)	Southern Oregon (n=7)	Eastern Oregon (n=10)	Oregon Coast (n=5)
10-12 Years								
Mean Rate	\$334	\$379	\$312	\$289	\$339	\$281	\$271	\$253
Median Rate	\$325	\$370	\$320	\$300	\$325	\$250	\$275	\$250
95 th Percentile	\$547	\$567	\$450	n/a	n/a	n/a	n/a	n/a

Table 36: 2021 Hourly Billing Rate by Total Years Admitted to Practice – Private Practice

	Oregon (n=150)	Downtown Portland (n=66)	Tri-County (n=44)	Upper Willamette Valley (n=11)	Lower Willamette Valley (n=13)	Southern Oregon (n=n/a)	Eastern Oregon (n=7)	Oregon Coast (n=5)
13-15 Years								
Mean Rate	\$366		\$348		\$336		\$305	\$248
Median Rate	\$350	\$400	\$350	\$315	\$300	n/a	\$300	\$250
95 th Percentile	\$586	\$733		n/a	n/a	n/a	n/a	n/a
	Oregon (n=187)	Downtown Portland (n=66)	Tri-County (n=69)	Upper Willamette Valley (n=15)	Lower Willamette Valley (n=11)	Southern Oregon (n=9)	Eastern Oregon (n=14)	Oregon Coast (n=n/a)
16-20 Years								
Mean Rate	\$359		\$320		\$314		\$314	n/a
Median Rate	\$350	\$425	\$315	\$300	\$305	\$280	\$285	n/a
95 th Percentile	\$600	\$683		n/a	n/a	n/a	n/a	n/a
	Oregon (n=317)	Downtown Portland (n=103)	Tri-County (n=109)	Upper Willamette Valley (n=27)	Lower Willamette Valley (n=26)	Southern Oregon (n=18)	Eastern Oregon (n=29)	Oregon Coast (n=5)
21-30 Years								
Mean Rate	\$371		\$351		\$315		\$306	\$250
Median Rate	\$350	\$450	\$350	\$350	\$313	\$300	\$320	\$250
95 th Percentile		\$697	\$550	\$477	\$422	n/a	\$450	n/a
	Oregon (n=313)	Downtown Portland (n=101)	Tri-County (n=96)	Upper Willamette Valley (n=28)	Lower Willamette Valley (n=34)	Southern Oregon (n=12)	Eastern Oregon (n=25)	Oregon Coast (n=17)
Over 30 Years								
Mean Rate	\$384		\$364		\$349		\$292	\$302
Median Rate	\$350	\$425	\$350	\$308	\$325	\$313	\$275	\$275
95 th Percentile		\$798	\$600	\$408	\$571	n/a	\$435	n/a

Q14: When you charged on an hourly basis, what was your usual billing rate per hour in 2021?

Q2: What year were you first admitted to a state bar other than Oregon? and year admitted to OSB from database [converted to years]

Q6: Which type of employment represented 50% or more of your practice as of 12/31/2021? [private practice only]

Area of Practice

Table 37 presents the 2021 hourly billing rate data by area of practice for all private practice lawyers, regardless of level of employment. The highest hourly billing rate was for Business/Corporate – Litigation (mean=\$408) statewide, with variations across the regions.

Table 37: 2021 Hourly Billing Rate by Area of Practice – Private Practice

	Oregon (n=33)	Downtown Portland (n=16)	Tri-County (n=10)	Upper Willamette Valley (n=n/a)	Lower Willamette Valley (n=5)	Southern Oregon (n=n/a)	Eastern Oregon (n=n/a)	Oregon Coast (n=n/a)
Administrative Law								
Mean Rate	\$331	\$337	\$309	n/a	\$379	n/a	n/a	n/a
Median Rate	\$300	\$288	\$275	n/a	\$325	n/a	n/a	n/a
95 th Percentile	\$629	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	Oregon (n=34)	Downtown Portland (n=15)	Tri-County (n=12)	Upper Willamette Valley (n=n/a)	Lower Willamette Valley (n=n/a)	Southern Oregon (n=n/a)	Eastern Oregon (n=n/a)	Oregon Coast (n=n/a)
Bankruptcy								
Mean Rate	\$383	\$432	\$364	n/a	n/a	n/a	n/a	n/a
Median Rate	\$370	\$400	\$375	n/a	n/a	n/a	n/a	n/a
95 th Percentile	\$631	n/a	n/a	n/a	n/a	n/a	n/a	n/a