

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ARTHUR DOE, *et al.*

Plaintiff,

v.

FITCH,¹ *et al.*,

Defendants.

Case No. 3:16-cv-00789 (CWR) (FKB)

DECLARATION OF SHAYANA KADIDAL IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND COSTS

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Attorneys for Plaintiffs

¹ Lynn Fitch is substituted for former Attorney General Jim Hood. Fed. R. Civ. P. 25(d).

DECLARATION OF SHAYANA KADIDAL

I, Shayana Kadidal, hereby declare as follows:

1. I am an attorney with the Center for Constitutional Rights (“CCR” or “the Center”).

I make this declaration in support of Plaintiffs’ application for attorneys’ fees.

2. The Center for Constitutional Rights (“CCR”) is a national non-profit legal and educational organization dedicated to advancing and protecting the rights guaranteed by the United States Constitution and international human rights law. Founded in 1966, CCR has a long history of litigating cases on behalf of those with the fewest protections and least access to legal resources, including numerous landmark civil and human rights cases fighting for racial justice and the rights of sexual minorities.

Overview of the Litigation

3. CCR represented plaintiffs in successful challenges to a discriminatory requirement for those convicted of solicitation for oral or anal sex to register as sex offenders in Louisiana. In *Doe v. Jindal*, 851 F. Supp. 2d 995, 1009 (E.D. La. 2012), the federal court for the Eastern District of Louisiana found plaintiffs required to register as sex offenders because of convictions under the state’s Crimes Against Nature by Solicitation (“CANS”) statute entitled to judgment as a matter of law under the Equal Protection Clause.” In a companion class action challenge, *Doe v. Caldwell*, 913 F. Supp. 2d 262, 265 (E.D. La. 2012), the Court held that Louisiana’s sex offender registry law, “which mandates sex offender registration by individuals convicted of violating the State’s Crime Against Nature by Solicitation statute, but not those convicted for the identical sexual conduct under the Prostitution statute, deprived individuals of Equal Protection of the laws[.]”.

4. In 2015, staff attorneys at CCR were contacted by Brenda Doe, a former class representative in *Doe v. Caldwell*, who had been removed from the Louisiana registry in 2013

pursuant to the terms of the settlement on behalf of herself and others similarly situated. But when she moved to Mississippi, where her mother lived, Brenda Doe was advised that Mississippi would not remove her from Mississippi's registry, despite the fact that the only trigger for sex offender registration there was the Louisiana conviction.

5. In communication with Mississippi's Department of Public Safety, CCR attorneys were advised that even though Louisiana no longer deemed a CANS conviction a registrable offense, Mississippi did, because the CANS conviction was analogous or equivalent to a conviction under Mississippi's "Unnatural Intercourse" statute, which has been interpreted to bar oral or anal sex and subjects those convicted of it to imprisonment for up to ten years. Miss. Code Ann. § 97-29-59; *State v. Davis*, 79 So. 2d 452 (Miss. 1955); *State v. Hill*, 176 So. 719 (Miss. 1937). Mississippi's Sex Offender Registration Act classified convictions for Unnatural Intercourse or out-of-state equivalents, as sex offenses requiring registration. § 45-33-23(h)(xi), (xxi). As in Louisiana, it did not classify Prostitution as a registrable offense.

6. In 2003, the United States Supreme Court struck down Texas's sodomy prohibition in its entirety on due process grounds because the "statute further[ed] *no legitimate state interest* which can justify its intrusion into the personal and private life of the individual." *Lawrence v. Texas*, 539 U.S. 558, 578 (2003) (emphasis added). In striking down the Texas law and asserting that it lacked any legitimate state interest, the Court necessarily held that any criminal statute whose only element is the commission of oral or anal sex is unconstitutional. *Id.* at 578-79. In explicitly overruling *Bowers v. Hardwick*, 478 U.S. 186 (1986), a prior unsuccessful facial challenge to Georgia's sodomy statute, the Court held that its ruling was not limited to Texas or to laws singling out same-sex couples. Yet despite the Supreme Court's unequivocal ruling,

Mississippi's Unnatural Intercourse statute, including the provision outlawing a "crime against nature committed with mankind," remains on the books.

7. CCR began investigating how many individuals who had been removed from the Louisiana sex offender registry were required to register in Mississippi solely because of a CANS conviction that the state deemed to be an out-of-state equivalent to a conviction for "Unnatural Intercourse." In addition, CCR researched the number of individuals who were required to register because of Mississippi convictions for oral or anal sex under the "Unnatural Intercourse" statute. This research led CCR to co-counsel with Robert MacDuff and Matthew Strugar in order to prepare a Fourteenth Amendment challenge to Mississippi's Unnatural Intercourse statute as well as the registration requirements for those with Unnatural Intercourse convictions.

8. After meeting with several individuals required to register in Mississippi because of Unnatural Intercourse or Louisiana CANS convictions, in January 2016, Plaintiffs' counsel reached out to the office of Mississippi's Attorney General. After a preliminary discussion, Plaintiffs' counsel agreed to send the Attorney General's office a copy of the complaint expected to be filed in the Southern District of Mississippi. In March, 2016, counsel held a follow-up call after the Attorney General's office reviewed the complaint. Discussions between Plaintiffs' counsel and the Attorney General's office continued through August of 2016.

9. When these discussions failed to result in an agreement to remove individuals with CANS convictions or Unnatural Intercourse convictions from Mississippi's sex offender registry, Plaintiffs' counsel began preparing to file the complaint as well as motions for summary judgment, class certification, and for leave to proceed under pseudonyms.

10. Plaintiffs filed their class action complaint on October 7, 2016, alleging that Mississippi's sex offender registration requirement for CANS and Unnatural Intercourse convictions violated the Equal Protection and Due Process clauses of the Fourteenth Amendment.

11. Plaintiffs filed motions for summary judgment (Dkt. 16), pseudonymity (Dkt. 19), and class certification (Dkt. 21) on November 3, 2016. On November 18, 2016, as briefing on these motions proceeded, the Defendants filed a motion for discovery, which Court granted on June 2, 2017 (Dkt 44). The order further denied Plaintiffs' motion for summary judgment and class certification without prejudice pending the completion of discovery. *Id.* That same day, the Court granted Plaintiffs' motion for leave to proceed under pseudonyms and pursuant to a protective order for the duration of discovery. (Dkt. 43).

12. The parties submitted a proposed case management schedule as well as settlement proposals to Magistrate Judge Ball. The discovery that ensued, including voluminous document discovery and deposition testimony, spanned several months.

13. On February 22, 2018, following the completion of several depositions, the parties met in a settlement conference with Magistrate Judge Ball. Negotiations to settle the claims of the plaintiffs with CANS convictions – Brenda Doe, Carol Doe, Diana Doe, and Elizabeth Doe – continued for several weeks.

14. On May 10, 2018, Judge Reeves entered an order directing the Department of Public Safety to remove all individuals from the Mississippi Sex Offender Registry if their sole reason for registration was a conviction or multiple convictions for CANS. (Dkt. 105). The order, which applied not only to named plaintiffs, but to all individuals similarly situated because of CANS convictions in Louisiana, further directed the Department of Public Safety to notify individuals that they would be removed from the MSOR, permit them to apply for new state

identification at no cost, and direct relevant public agencies to remove any references to such individuals as registrants.

15. This settlement, obtained more than two years after Plaintiffs' counsel first approached the Attorney General's office to attempt to avoid litigation, represented a complete victory not only for the CANS plaintiffs but for all others similarly situated who had been forced to register for years because of CANS convictions. These individuals suffered under the requirement to register as sex offenders long after the case should have and could have been resolved.

16. While the case continued on behalf of a remaining plaintiff, Arthur Doe, the instant fee petition pertains only to fees incurred in support of the claims of the CANS plaintiffs.

Basis for Proposed Hourly Rates of CCR Attorneys and Staff

Shayana Kadidal

17. I am a member of the bars of the State of New York and the District of Columbia, as well as several federal courts including the United States Supreme Court. I received my law degree in 1994 from Yale Law School, where I was a member of the law journal, and was afterwards a law clerk to Judge Kermit V. Lipez of the United States Court of Appeals for the First Circuit. I have worked at CCR since 2001. I have held a central role on a large portion of CCR's post-9/11 litigation, including both cases successfully challenging the indefinite detention of foreign nationals at Guantánamo Bay Naval Station before the Supreme Court, *Rasul v. Bush*, 542 U.S. 466 (2004) and *Boumediene v. Bush*, 553 U.S. 723 (2008), which I worked on from the very beginnings of the litigation, and a major *Bivens* case regarding mistreatment of immigration detainees swept up after the attacks, *Ziglar v. Abassi*, 137 S. Ct. 1843 (2017). I also co-counseled a First Amendment challenge to the Material Support Statute, *Holder v. Humanitarian Law Project*, 561 U.S. 1 (2010),

and second-chaired a challenge to coercive No-Fly List placement of our clients that resulted in a unanimous decision that the Religious Freedom Restoration Act provides for damages against federal officials, *Tanzin v. Tanvir*, 141 S. Ct. 486 (2020). I am currently senior managing attorney of CCR's Guantánamo litigation project, a position I have held since late 2006. In that capacity I hold a current Top Secret//SCI clearance from the Justice Department.

18. I have worked on a number of fees-generating cases during my years at CCR. In *Humanitarian Law Project*, CCR received over ten thousand dollars in fees in 2008 for my hours as part of an Equal Access to Justice Act (EAJA) award against the federal government. My recovery was capped by statute at \$174 per hour, but the application noted that the market rate for an attorney of my then-level of experience in the Los Angeles market was \$475 per hour. For five years I was lead counsel for an organization of Black firefighters in a Title VII challenge to the low minority hiring rates of the New York City Fire Department. *See United States v. City of New York*, 731 F. Supp. 2d 291 (E.D.N.Y. 2010). That case resulted in a nine-figure back pay judgment and various preferential hiring remedies; when the case ultimately settled in 2014, attorneys' fees of over nine million dollars were part of the settlement. (Our fee application had listed my market rate as \$575 per hour, and the 2013 order granting interim fees granted my hours at a rate of \$375 per hour, *see United States v. City of New York*, No. 07-CV-2067, 2013 WL 5542459, at *8 (E.D.N.Y. Aug. 30, 2013).) I also was counsel in *Kunstler, et al., v. City of New York, et al.*, No. 04-CV-1145 RWS (S.D.N.Y.), an unlawful arrest case brought under § 1983 for 52 anti-war protestors that settled in 2008 for two million dollars, approximately half of which was attorneys' fees; CCR requested \$450 per hour for my time on the case.

19. A conservative market billing rate in the Southern District of New York for attorneys with my level of experience is \$700 per hour. Federal courts in New York City have

approved similar rates for less experienced attorneys. *See, e.g., New York Times Co. v. CIA*, 251 F. Supp. 3d 710, 715 (S.D.N.Y. 2017) (\$650 at 14 years of experience); *Schwartz v. DEA*, No. 13CV5004CBAST, 2019 WL 1299192, at *9 (E.D.N.Y. Mar. 1, 2019) (summarizing cases), *report and recommendation adopted*, No. 13CV5004CBAST, 2019 WL 1299660 (E.D.N.Y. Mar. 21, 2019); *VR Optics, LLC v. Peloton Interactive, Inc.*, No. 16-CV-6392 (JPO), 2021 WL 1198930, at *5 (S.D.N.Y. Mar. 30, 2021) (\$690 per hour for associates); *Vista Outdoor Inc. v. Reeves Fam. Tr.*, No. 16 CIV. 5766, 2018 WL 3104631, at *6 (S.D.N.Y. May 24, 2018) (up to \$1,170 for partners and \$925 for associates). This rate is consistent with other standard sources for determining the “prevailing market rates,” *Blum v. Stenson*, 465 U.S. 886, 895 (1984), in New York. The Laffey matrix is the most commonly-used base from which to calculate local market rates. *See Laffey v. Northwest Airlines, Inc.*, 572 F. Supp. 354, 371 (D.D.C. 1983); *Save Our Cumberland Mountains, Inc. v. Hodel*, 857 F.2d 1516, 1518-25 (D.C. Cir. 1988) (en banc). As adjusted for inflation by the Legal Services Index (LSI), the Laffey matrix calculates an hourly rate for attorneys with 20 or more years of experience in the Washington, D.C. market of \$919/hr. *See* <http://www.laffeymatrix.com/see.html>.² Washington, D.C. is only the third most expensive legal market in the United States (behind New York City and the San Francisco Bay Area). *See, e.g., Citizens for Resp. & Ethics in Washington v. DOJ*, 80 F. Supp. 3d 1, 4 (D.D.C. 2015).

20. While I am seeking out-of-market rates in this action, I am not seeking a full \$700 New York City rate. Instead, I am seeking a rate of \$550, which I believe is a reasonable blended

² The U.S. Attorney’s Office fees matrix for 2021 applies more conservative inflation indexing to the original Laffey matrix and calculates an hourly rate for attorneys with 27 years of experience in the Washington, D.C. market of \$713/hr. *See* <https://www.justice.gov/usao-dc/page/file/1189846/download> (hereinafter “USAO Matrix”).

rate between my New York rate and the rate my services would command in the Northern Division of the Southern District of Mississippi legal market.

21. I kept contemporaneous time records in this case. I recorded my time daily, including notation of the nature of the services and work performed. I record my time in tenth of an hour increments. Attached hereto as Exhibit A is a true and correct copy of my compensable time records to date in this case. I have carefully reviewed these records up through obtaining partial judgment and attest that they reflect time that was reasonably spent in litigating this case. My hours consist of 51.0 hours on the merits portion of the litigation and 29.1 hours preparing this fee motion, for a total of 77.8 hours. At \$550 an hour, the lodestar for the 80.1 hours of time reflected in Exhibit A (which include no travel hours) is \$44,055.00 (\$28,050.00 for the 51.0 hours on the merits portion of the litigation and \$16,005.00 on this fee motion).

Ghita Schwarz

22. Ghita Schwarz was a Senior Staff Attorney at CCR. She earned a J.D. from Columbia University School of Law in 1998, where she was an Articles Editor for the *Columbia Human Rights Law Review*, a James Kent Scholar and a Harlan Fiske Stone Scholar. From 1998 to 2005 she was an Equal Justice Works Fellow, a staff attorney, and a senior staff attorney at Queens Legal Services, a division of Legal Services for New York City, where she litigated public interest cases on behalf of low-income people in administrative, state, and federal courts. She served as a Chadbourne & Parke Fellow at The Door Legal Services Center from 2005 to 2007, where she litigated public interest cases on behalf of young people in administrative, state and federal courts. From 2007 to 2012, Ms. Schwarz was an associate and senior counsel at LatinoJustice PRLDEF, litigating complex constitutional and civil rights cases in federal and state courts. She served as co-counsel in *Lozano v. City of Hazleton*, 496 F. Supp. 477 (M.D. Pa 2007);

aff'd 620 F.3d 170 (3d Cir. 2010), *vacated and remanded*, 131 S. Ct. 1358 (2011) (challenging a Pennsylvania town's ordinance banning employment and housing of immigrants); *Hispanic Interest Coalition of Alabama v. Bentley*, 691 F.3d 1236 (11th Cir. 2012) (challenging the State of Alabama's law regulating immigrant access to employment, schools, businesses, and housing); *Milanes v. Napolitano*, 354 Fed. Appx. 573 (2d Cir. 2009) (putative class action challenging delays in naturalizing Latino applicants for citizenship); and *Recalde v. Bae Cleaners LLC*, 20 Misc. 3d 827, 862 N.Y.s. 2d 781 (Sup. Ct. N.Y. County 2008) (finding a landlord's attempt to evict based on immigration status to violate the New York City Human Rights Law). She served as lead counsel in *Berkoski v. Board of Trustees of Inc. Village of Southampton*, 889 N.Y.S. 2d 623 (2d Dep't 2009) (winning the right of day laborers to intervene in a case impacting their First Amendment rights to seek employment) and *Aguilar v. ICE*, 811 F. Supp. 2d 212 (S.D.N.Y. 2011) (challenging Fourth and Fifth Amendment violations during ICE practice of warrantless entries into Latino homes).

23. Ms. Schwarz joined CCR in 2012, where she litigated a range of complex federal civil rights cases, including a challenge to the discriminatory hiring of black firefighters in New York City that resulted in a damages and fees award exceeding one hundred million dollars, *United States v. City of New York* (described *supra* paragraph 18), and a number of other complex civil rights cases, *see, e.g., Hassan v. City of New York*, 804 F.3d 277 (3d Cir. 2015) (successfully challenging the NYPD's discriminatory program of suspicionless surveillance of Muslims in New Jersey); *Al Otro Lado v. Nielsen*, 17-cv-02366 (S.D. Cal.) (challenging government practice of turning a class of asylum seekers away at the U.S.-Mexico border); *Make the Road New York v. Cuccinelli*, 419 F. Supp. 3d 647 (2019), 969 F.3d 42 (2d Cir. 2020) (Administrative Procedure Act and Equal Protection case against Department of Homeland Security's public charge regulation

targeting low-income immigrants). She occupied the leading role in much of CCR's FOIA work, including litigation in such cases as *National Day Laborer Organizing Network v. ICE*, 877 F. Supp. 2d 87 (S.D.N.Y. 2012); *Immigrant Defense Project v. ICE*, 208 F. Supp. 3d 520 (S.D.N.Y. 2016); and *Detention Watch Network v. ICE*, 215 F. Supp. 3d 256 (S.D.N.Y. 2016) (FOIA action establishing right to pricing information in government detention contracts, and resulting in award of nearly three hundred thousand dollars in attorneys' fees). In December 2021 she left CCR to rejoin LatinoJustice PRLDEF as Legal Director.

24. She kept contemporaneous time records, recording her time daily, including notation of the nature of the services and work performed in tenth of an hour increments. Attached as Exhibit B is a true and correct copy of her compensable time records. Based on the market rates set forth in paragraph 19, above, an appropriate market rate for Ms. Schwarz would exceed \$600 an hour, *see, e.g.*, Laffey Matrix (\$919 for attorneys in D.C.); USAO Matrix (\$691 for attorneys in D.C.), and a blended market rate of \$450 an hour is appropriate for her work in this case. Exhibit B reflects a total of 378.9 compensable hours expended by Ms. Schwarz, including 46.3 travel hours and 332.6 non-travel. At the requested market rate of \$450 an hour, with all travel hours billed at half the market rate, the lodestar is \$149,670.00 for her non-travel hours and \$10,417.50 for her travel hours, totaling \$160,087.50.

Alexis Agathocleous

25. Alexis Agathocleous is currently the Deputy Director of the ACLU's Racial Justice Program (RJP). Prior to joining the ACLU in 2020, he worked with the Innocence Project's Strategic Litigation Department, focusing on eyewitness identification evidence, false confessions, and racial bias in the criminal legal system. Before that, Mr. Agathocleous was Deputy Legal Director at CCR, where he also litigated federal civil rights cases involving racial and religious

profiling, the rights of incarcerated people, gender and LGBTQ justice, and the criminalization of dissent. He was counsel for plaintiffs in *Aref v. Holder*, challenging policies and conditions at the Federal Bureau of Prisons' Communications Management Units, in *Ashker v. Governor of California*, a class action lawsuit challenging long-term solitary confinement at California's Pelican Bay prison that resulted in the transfer of thousands of prisoners from SHU units across the state, and in *Doe v. Jindal* and *Doe v. Caldwell*, the successful companion challenges to a Louisiana law that required individuals convicted of a "Crime Against Nature" to register as sex offenders that ultimately gave rise to this case. Prior to joining CCR he was the Director of the Reinvestigation Project at the Office of the Appellate Defender in New York City, where he also represented indigent defendants on appeal from felony convictions as a senior staff attorney, and was a Karpatkin Fellow with the ACLU's Racial Justice Project. Mr. Agathocleous graduated from Brown University in 1997 and Yale Law School in 2003. He kept contemporaneous time records, recording his time daily, including notation of the nature of the services and work performed in tenth of an hour increments. Attached as Exhibit C is a true and correct copy of his compensable time records. Based on the market rates set forth in paragraph 19, above, an appropriate market rate for Mr. Agathocleous would exceed \$600 an hour, *see, e.g., Schwartz v. DEA* (\$640 per hour for senior associates); Laffey Matrix (\$653 for 18th year attorneys in D.C.); USAO Matrix (\$764 for 18th year attorneys in D.C.); and a blended market rate of \$450 an hour is appropriate for his work in this case. Exhibit C reflects a total of 142.1 compensable hours expended by Mr. Agathocleous, including 31.3 travel hours and 110.8 non-travel hours. At the requested market rate of \$450 an hour, with all travel hours billed at half the market rate, the lodestar is \$49,860.00 for his non-travel hours and \$7,042.50 for his travel hours, totaling \$56,902.50.

Stephanie Llanes

26. Stephanie Llanes is currently counsel at Protect Democracy, a nonpartisan nonprofit organization formed in late 2016 by former Office of White House Counsel and Justice Department attorneys with the mission to prevent American democracy from declining into a more authoritarian form of government. She manages the organization's litigation and legal advocacy team and oversees the skills development of counsel and impact associates, the Democracy and Rule of Law clinic at Harvard Law, and co-counsel relationships. She received her bachelor's degree from Emory University and her J.D. from the University of California–Berkeley School of Law in 2016. From 2016 to 2018 she was a Bertha Justice Fellow at CCR, litigating cases in the racial justice and government misconduct dockets, including this case. (Her predecessor in the Bertha Fellowship was Mr. Zachery Morris, who appears in the schedule of expenses, Exhibit F, but for whom Plaintiffs are not submitting a fees request.) She kept contemporaneous time records, recording her time daily, including notation of the nature of the services and work performed in tenth of an hour increments. Attached as Exhibit D is a true and correct copy of her compensable time records. Based on the market rates set forth in paragraph 19, above, an appropriate market rate for Ms. Llanes would exceed \$400 an hour, *see, e.g., New York Times v. CIA* (\$400 for junior associates); *Schwartz v. DEA* (\$415-\$640 for associates and \$300-\$350 for summer associates); Laffey Matrix (\$381 for first year attorneys in D.C.); USAO Matrix (\$442 for first year attorneys in D.C.); and a blended market rate of \$250 an hour is appropriate for her work in this case. Exhibit D reflects a total of 142.5 compensable hours expended by Ms. Llanes, including 17.0 travel hours and 125.5 nontravel hours. At the requested market rate of \$450 an hour, with all travel hours

billed at half the market rate, the lodestar is \$31,375.00 for her non-travel hours and \$2,125.00 for her travel hours, totaling \$33,500.00.

Claire Dailey

27. Claire Dailey is a Senior Legal Worker at CCR, where she has worked in her current capacity for fifteen years, and has been assigned to this case throughout this litigation. She kept contemporaneous time records, recording her time daily, including notation of the nature of the services and work performed in tenth of an hour increments. Attached as Exhibit E is a true and correct copy of her compensable time records. A market rate of \$150 is commensurate with awards in the Southern District of New York to paralegals with extensive experience who have made significant contributions to the case. The prevailing rate for paralegals in the Southern District is at least \$150. *See, e.g., Long v. HSBC USA Inc.*, No. 14 CIV. 6233 (HBP), 2016 WL 4764939, at *11 (S.D.N.Y. Sept. 13, 2016) (awarding \$150 per hour for paralegal at plaintiff-side employment law firm); *Navig8 Chemicals Asia Pte., Ltd. v. Crest Energy Partners, LP*, 15 Civ. 7639 (PAE), 2015 WL 7566866 at *2 (S.D.N.Y. Nov. 24, 2015) (awarding hourly rate \$150 for paralegal work); *see also* USAO Matrix (\$200 per hour for paralegals in D.C.). A blended market rate of \$125 an hour is appropriate for her work in this case. Exhibit E reflects a total of 72.5 compensable hours expended by Ms. Dailey, including no travel hours. At the requested market rate of \$125 an hour, the lodestar for her work is \$9,062.50.

Expenses

28. Attached as Exhibit F is a record of the compensable expenses of this litigation. These consist primarily in filing fees, travel expenses, attorney admissions fees, and records search fees, and were recorded contemporaneously and stored in CCR's finance recording system. All are expenses that would normally be passed on to fee-paying clients. As indicated within the

document, Exhibit F includes expenses that were paid by CCR for CCR attorneys (Ms. Schwarz, Mr. Agathacleous, Ms. Llanes, and Mr. Morris) as well as for co-counsel Matthew Strugar.

* * *

29. I have reviewed all the time entries submitted and can attest that time billed was devoted to work necessary for this case. Nonetheless, to account for the possibility of some duplication and inefficiencies among attorneys, Plaintiffs have applied a 10% discount to all work done by staff of CCR. Together the total lodestar for the individuals listed above is \$287,602.50, the 10% discount reduces that amount to \$258,842.25. The compensable expenses of the litigation, set forth in Exhibit F, are \$11,318.30.

Pursuant to 28 U.S.C. § 1924, I certify that the information in this declaration and its exhibits are correct to the best of my knowledge and that the services for which fees are sought were actually and necessarily performed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of December, 2021.



Shayana Kadidal

Exhibit A

Timekeeper: Shayana Kadidal

Date	Hours	Comment
		conv w Baher re joining case (.3); read complaint (.7); call w Strugar re case
9/20/17	1.6	(.6)
9/23/17	0.3	review of basic filings to date
9/25/17	1.1	review of basic filings to date
9/26/17	4	review complaint, MTD briefs, discovery briefs, cert petition and opp in snyder
9/27/17	1.5	email CD re judge's SJ denial, continue review of MTD and relevant cases
10/2/17	0.5	continue review of MTD and relevant cases
	1.0	continue review of MTD and relevant cases; 0.1 emails re scheduling call w
10/3/17	1.1	team
10/4/17	0.2	emails w GS re amendments
10/12/17	0.2	emails re complaint amendment w GS, scheduling w team
10/13/17	0.3	emails re complaint amendment, review older emails re protective order
11/2/17	0.9	decryption, storage of discovery docs from state of Miss.email GS re same
11/6/17	0.5	scan and file hardcopy discovery docs
11/6/17	0.5	initial review of responses and objections to discovery requests
11/8/17	0.3	review discovery plan email from MS; resched meeting with GS
11/9/17	0.2	coord meeting with GS
11/9/17	0.3	evening call w GS
11/13/17	0.3	Llanes emails re storage of docs
11/16/17	0.4	conf call re discovery responses
11/30/17	0.1	email w GS re schedule for tomorrow's call
12/1/17	0.6	conf call re discovery responses: MS, GS, Jake, Claire Dailey
12/7/17	1.1	team call discussing FPs RPAs and rogs
12/11/17	0.2	Columbia research student for old versions of KS etc statutes
12/12/17	0.2	obsolete statute research
12/13/17	0.1	review emails re discovery extensions
1/8/18	0.8	call re discovery -- deposition targets -- with GS SL RMD MS.

2.1 tracking down Chris E. Cosner UCMJ conviction appeals in databases and
 alaying his conviction vs archived MCM and UCMJ provisions
 0.2 call with Fidell
 re how military specifications work
 0.2 rereview disc docs for 4pm call
 0.5 call

1/11/18 3 and emails w MS GS SL

1/12/18 0.1 depo scheduling emails

1/17/18 0.6 call with Miss AG attorneys re depositions

1/25/18 0.1 emails re rescheduling call

1/26/18 0.4 depo schedule team call GS MS CD

2/1/18 0.2 conf call w team re Alexis' witness status, depo dates

2/6/18 1.2 discovery review and back-and-forth re last RFPs and rogs

2/8/18 0.7 rereview of complaint, opinion, sttaute

2/9/18 0.8 review 11th Cir decision in Greene v Georgia

2/10/18 0.7 settlement proposals (GS, MS): review and analysis
 4.7 continue review of settlement document, research on due process cases re

2/12/18 4.9 dangerousness, 0.2 emails re schedling discussion of same
 0.1 review of deposition notices sent to PW; 2.0 continue research into caselaw

2/13/18 2.1 standards on continued dangerousness
 continued review of settlement memo, rsch on prior Louisiana litigation,

2/14/18 5.2 research into fees standards

2/15/18 5.5 research on SJ cases cited by state
 pro hac application and CGS request forms 0.4; obtain CGS 1.6: review local

2/16/18 3.3 rules 1.1admin pro hac checks 0.2
 0.6 discussion with GS re settlement negotiations in MS, and record review
 0.9 call with team before call with Paul Barnes, Wilson Minor
 1.2 call with PB and

2/26/18 2.7 WM and team, and then debrief w GS/SL, and later just GS
 0.2 emails re settlement proposal for Albert Doe
 0.5 call w Paul Barnes et al re A. Doe settlement and other mising fact possible class members; and debrief w

2/27/18 1.3 GS SL CD afterwards
 0.6 rereview MacDonald v Moore (4th Cir)

2/28/18 0.9 .5 judge ball call and debrief.
 4 Wendell Gover research: what is PCF?

4/10/20 0.4 review timesheets summaries , txt MS re fees settlement proposal

4/20/20 0.8 began line by line review of CCR hours for fee proposal
review emails re local rates, partial success, cutoff dates. line by line review of

4/21/20 0.8 CCR and cocounsel MS timesheets.

4/22/20 0.9 email to GS re open questions on fee proposal 0.80.1 email to MS re same

4/23/20 0.3 agreed order .2fees followup .1

4/27/20 0.3 review Reeves atty fees decisions

5/13/20 0.5 txts and emails re fees

5/14/20 0.6 emails w GS re fees

8/26/20 1.8 initial review and assembly of time records

9/3/20 0.2 read emails from GS, CD re timesheet processing

9/4/20 0.2 review timesheet entry for 4/5/2018; email reply to CD GS

10/17/20 0.3 review past timesheets, draft email to GS CD

12/4/20 0.5 review records of hours
review legal standards re compensable fees for assembly of application; review

12/7/20 1.9 MS memos re same

12/13/20 0.5 gather costs records for fees proposal; emails w CD re same

12/14/20 1.8 assembly of CCR fees records
0.7emails to MS CD JW re fees (.7); crossindexing of selected hours (.3); email
to MS re costs (.1); sorting of compensable expenses (.4); emails to Rob and

12/15/20 1.7 Jake re hours (.2)

12/16/20 0.2 emails to MS re fees

6/1/21 0.4 review MS draft fees application documents and email
work on fees application: begin drafting declaration; research comparable

6/3/21 1.3 rates; email GS re above

6/8/21 1.5 research on rates

6/9/21 1 additional research on NYC market billing rates
compilation of fees information, all former proposals to Paul Wilson, emails w

6/17/21 1.3 GS BA CD, texts and emails with MS re past data submitted to PW.

10/13/21	0.2 emails, calls w MS re fees application
11/17/21	0.6 collect and organize timesheet records drafting and research for CCR fees declaration; emails and texts to MS and GS
11/29/21	5.1 re same continued drafting; final formatting of time records for CD, SL, SK (2.3); email w MS re fees application, scheduling call (0.1); call with MS re declarations, 4 rates, and motion (0.3); edits to final decl (1.3)
11/30/21	
TOTAL	80.1

Exhibit B

Timekeeper: Ghita Schwarz

Date	Hours	Travel	Task	Comment
1/2/16	2		Research	Research on PI brief.
1/2/16	1		Editing	Editing PI motion.
1/3/16	2.5		Editing	Editing PI motion.
1/4/16	2.5		Editing	Editing PI motion.
1/5/16	3.5		Editing	Editing PI motion.
1/7/16	1		Editing	Work on PI research and drafting.
1/7/16	1		Research	PI Motion research
1/8/16	0.7		Meeting	Meet to prep for call on Monday.
1/8/16	1.5		Editing	PI motion.
1/8/16	1.5		Research	PI motion research
1/11/16	0.2		Email Exchange/Review	
1/11/16	2.5		Drafting / Writing	PI motion.
1/11/16	0.2		Client Communication	Call with Carol Doe re affidavit.
1/12/16	2.5		Drafting / Writing	PI motion.
1/13/16	0.2		Email Exchange/Review	Correspondence re agenda for call and complaint.
1/13/16	0.5		Editing	Edit complaint.
1/13/16	3.5		Drafting / Writing	PI motion.
1/14/16	1		Conference Call	Call with co-counsel re next steps.
1/21/16	0.1		Email Exchange/Review	Correspondence with CD re plaintiff outreach.
1/21/16	0.2		Editing	Letters to potential plaintiffs.
1/22/16	0.1		Email Exchange/Review	Correspondence with CD re plaintiff outreach.
1/22/16	1.3		Editing	Letters to potential plaintiffs (.3); PI brief (1.0).
1/25/16	0.1		Email Exchange/Review	Correspondence re scheduling.
1/25/16	1.5		Editing	Edit PI brief.

1/26/16	0.5	Research	Review AK's research on PDP.
1/26/16	0.5	Editing	Edit PDP section for PI motion.
1/29/16	0.9	Conference Call	Call with MS & CCR team re procedural due process.
1/29/16	1.7	Editing	PI Motion (1.5); letters to registrants (.2).
1/29/16	0.5	Research	Procedural due process for PI.
2/1/16	0.1	Email Exchange/Review	Correspondence re scheduling.
2/1/16	3.8	Editing	Edit complaint (.5); PI motion (2.5); class cert memo (.8).
2/2/16	0.2	Email Exchange/Review	Correspondence re scheduling and latest draft of complaint.
2/5/16	0.2	Email Exchange/Review	Correspondence with AK re proofing and edits to PI brief and complaint.
2/5/16	0.5	Editing	Review of AA's edits to brief and complaint; review of AK's fixes.
2/5/16	1	Research	Registry review for incarcerated people.
2/5/16	0.7	Client Communication	calls with potential plaintiffs
2/6/16	1	Email Exchange/Review	Editing/conforming PI brief.
2/7/16	1.5	Editing	PI brief and complaint.
2/8/16	4	Editing	Finalizing and citechecking PI brief and complaint for circulation to McDuff & Byrd.
2/16/16	0.2	Client Communication	Review of letter from potential plaintiff in prison.
2/18/16	0.1	Email Exchange/Review	Correspondence with team re update.
2/19/16	0.2	Client Communication	Call with Potential Plaintiff Sh.L.
2/26/16	0.1	Telephone Call	Messages from RM, AA, CM.
2/26/16	0.2	Email Exchange/Review	Email to team re: update from Rob; JH's open record request results.

2/26/16	0.2	Document Review	Review of open record request results.
2/27/16	0.2	Email Exchange/Review	Correspondence re records requests, scheduling.
2/27/16	0.6	Telephone Call	Team call on strategy for discussions with AG's office.
2/29/16	0.1	Telephone Call	Call with Rob McDuff.
2/29/16	0.3	Discuss	Lawrence-related issues with AA.
2/29/16	0.3	Email Exchange/Review	Scheduling.
2/29/16	0.5	Conference Call	Call with team and Rob McDuff.
3/1/16	0.2	Client Communication	Call with CM & AA.
3/3/16	0.1	Email Exchange/Review	Correspondence re scheduling.
3/3/16	0.5	Discuss	Debrief after call with MS AG's office.
3/3/16	0.8	Conference Call	Call with Mississippi AG's office and with RM, JH, MS, AA, ZM, CD. Review of PI motion, prep materials and additional research in prep for conference call with AG's motion.
3/3/16	1	Research	
3/4/16	0.3	Discuss	Discuss follow-up research and strategy with AA.
3/5/16	0.2	Email Exchange/Review	Response to research from MS.
3/5/16	0.2	Research	Review of Green v. Georgia.
3/6/16	0.2	Email Exchange/Review	Scheduling call.
3/7/16	0.1	Email Exchange/Review	Scheduling call.
3/8/16	0.2	Telephone Call	Call with RM.
3/8/16	0.2	Email Exchange/Review	Scheduling; points on brief.

3/8/16	1	Conference Call	Call with MS AG's office.
3/8/16	1	Document Review	Prep for call with AG's office.
3/8/16	1	Research	Post-Macdonald cases.
3/9/16	0.5	Discuss	Strategy discussion on filing with AA.
3/10/16	0.5	Discuss	Filing issues with ZM.
3/10/16	0.6	Meeting	Meet with AK, AA, ZM & BA re MS litigation.
3/11/16	1	Conference Call	Call with AA, AK, CD, MS re next steps.
3/11/16	1	Research	Review of post-Macdonald & post-Lawrence research.
3/14/16	0.1	Email Exchange/Review	Correspondence re complaint.
3/14/16	0.5	Document Review	Review of complaint revisions.
3/15/16	0.1	Email Exchange/Review	Scheduling team call.
3/16/16	0.2	Email Exchange/Review	Scheduling and circulation of relevant briefs.
3/16/16	0.7	Conference Call	Call with team in MS, CA.
3/21/16	0.1	Email Exchange/Review	Scheduling call with Chemerinsky.
3/21/16	0.5	Research	SOR research.
3/21/16	1.5	Editing	Editing PI.
3/22/16	0.7	Research	Various aspects of SOR research.
3/22/16	2	Editing	PI brief.
3/23/16	0.5	Conference Call	Call with AA & Chemerinsky re amicus/MacDonald v. Moose.
3/23/16	0.5	Research	Recent SOR cases.
3/23/16	2	Editing	PI brief.
3/24/16	1	Research	facial invalidity research.
3/24/16	1	Editing	PI.
3/28/16	2	Editing	PI brief.
3/28/16	2	Research	facial invalidity.

3/29/16	4	Editing	Pi brief.
3/30/16	0.1	Email Exchange/Review	Scheduling of call with Chemerinsky.
3/31/16	1.5	Editing	Edit & circulate PI brief.
4/1/16	0.5	Conference Call	Call with AA & Chemerinsky re amicus brief.
4/4/16	1.5	Research	Pseudonymity motion (1.0); review of MS comments on PI (.5).
4/11/16	1	Research	Pseud research.
4/12/16	1	Research	Pseudonymity motion.
5/13/16	0.1	Email Exchange/Review	Scheduling.
6/16/16	0.2	Email Exchange/Review	Correspondence re scheduling.
6/22/16	1	Meeting	Team meeting re timing.
6/22/16	1	Drafting / Writing	Pseudonymity.
7/13/16	0.3	Telephone Call	Call with AA.
7/25/16	1.5	Research	Heck related research.
7/26/16	0.1	Email Exchange/Review	Correspondence re amicus.
7/28/16	1	Editing	Review of DR's state survey memo.
8/2/16	2	Drafting / Writing	pseudonymity.
8/3/16	2	Drafting / Writing	pseudonymity.
8/12/16	1	Research	Pseudonymity memo.
8/12/16	2.5	Drafting / Writing	Pseudonymity memo.
8/14/16	3.5	Drafting / Writing	Pseudonmity motion.
8/14/16	1.5	Research	Pseudonymity motion.
8/15/16	1.5	Meeting	Meet with MS & AA re filing plans.
8/15/16	1.5	Drafting / Writing	Pseudonymity motion.
8/16/16	1.1	Editing	Complaint & class cert motion.
8/17/16	1.2	Editing	Complaint and class cert motion.

8/18/16	0.2	Email Exchange/Review	Correspondence re: legal issues in amicus.
8/24/16	0.2	Email Exchange/Review	Scheduling.
8/24/16	0.5	Meeting	Meet with AA re trip logistics and amicus update.
8/26/16	0.2	Email Exchange/Review	Correspondence re scheduling with RM.
8/27/16	0.2	Email Exchange/Review	Correspondence re filings.
9/9/16	2	Meeting	Meet with AA.
9/13/16	0.5	Editing	Complaint and Pseudonymity motion.
9/13/16	0.6	Telephone Call	Call with AA & MS re trip planning.
9/14/16	0.2	Client Communication	Calls with Does re meetings next week.
9/15/16	0.5	Client Communication	Correspondence with Does re meetings next week.
9/15/16	1	Editing	Research and editing of PI motion to reflect additional 5th Circuit law.
9/16/16	0.2	Email Exchange/Review	Correspondence re scheduling for trip.
9/16/16	0.5	Client Communication	Calls with Does re meetings next week.
9/17/16	0.3	Client Communication	Emails re scheduling of meetings.
9/18/16	8	Travel	Travel to Jackson, MS. Meet with █████ (1.5); █████ (1.5); █████ (1.5).
9/19/16	4.5	Meeting	driving between client meetings.
9/19/16	6.5	Travel	Meet with █████.
9/20/16	1.5	Meeting	driving between Jackson and north MS.
9/20/16	8	Travel	
9/21/16	4.5	Meeting	Meet with RMCD (1.0); AA (1.5); █████ (1.5); █████ (.5).
9/21/16	8.8	Travel	return to NY

9/22/16	0.2	Email Exchange/Review	Correspondence with legal team re complaint and scheduling.
9/22/16	0.5	Editing	Edit complaint to reflect changes.
9/26/16	1	Meeting	Meet with AA & SL (and CD by phone) re next steps to prepare for MS litigation.
9/27/16	0.2	Email Exchange/Review	Correspondence re complaint, scheduling.
9/29/16	1	Conference Call	Call with team.
9/30/16	0.2	Client Communication	Talk with D. Doe about new identity declarations.
9/30/16	0.3	Meeting	Meet with AA Re upcoming litigation tasks.
9/30/16	0.5	Email Exchange/Review	Correspondence re class cert statements; scheduling, ex post facto cases.
9/30/16	0.5	Editing	Class cert statement from CCR; verifications/identity declaration for SL.
10/3/16	0.3	Email Exchange/Review	Correspondence with SL re converting PI to SJ; review of standard.
10/4/16	2.5	Editing	Review of summary judgment standard draft by SL; editing of complaint.
10/4/16	0.3	Client Communication	Complaint.
10/4/16	1.1	Conference Call	
10/5/16	3.5	Editing	Transforming PI motion to SJ.
10/5/16	0.3	Email Exchange/Review	Correspondence re class cert, sj, scheduling, filing.
10/5/16	0.2	Client Communication	Call with HY.
10/6/16	0.7	Editing	Finalizing complaint; pro hac vice applications.
10/6/16	0.4	Client Communication	Calls to Ps.
10/6/16	1	Meeting	Summary judgment motion.
10/6/16	0.5	Conference Call	Call with RMc, JH, MS, AA, SL, CD.
10/7/16	0.8	Editing	Cleanup of complaint.

10/7/16	0.3	Email Exchange/Review	Correspondence with team re filing, class cert, etc.
10/7/16	0.2	Client Communication	Call with [REDACTED]; message for AA.
10/11/16	1	Editing	SJ editing.
10/12/16	1	Editing	SJ.
10/13/16	0.5	Conference Call	Call with SL, CD, AA, MS.
10/13/16	2.5	Editing	SJ motion.
10/14/16	0.3	Editing	Editing of SJ motion.
10/17/16	0.5	Conference Call	Call with Jenner & Block re potential amicus for DKT Liberty.
10/17/16	0.5	Discuss	Next steps with AA.
10/17/16	0.2	Email Exchange/Review	Correspondence with team re next litigation steps and scheduling of call with AG's office.
10/18/16	1.5	Editing	SJ motion.
10/18/16	0.2	Client Communication	Call with AA.
10/19/16	1.5	Editing	SJ motion.
10/19/16	0.1	Email Exchange/Review	Amicus.
10/20/16	0.3	Email Exchange/Review	Scheduling, confidentiality, class cert, SJ.
10/20/16	0.5	Conference Call	Team call.
10/21/16	0.1	Email Exchange/Review	Scheduling.
10/21/16	1	Editing	SJ to account for Patel.
10/21/16	0.2	Email Exchange/Review	Scheduling, SJ.
10/24/16	2.5	Editing	Motion for Pseudonymity/Under seal.
10/24/16	1	Research	
10/24/16	0.2	Email Exchange/Review	Scheduling with amicus counsel; emails re briefing with team.
10/24/16	1.2	Meeting	Meet with SL, AA re next steps in litigation.

10/25/16	1.1	Conference Call	Team call (RMcD, AA, MS, CD, SL) (.7) with AG's office; follow-up call with team (.4).
10/25/16	0.5	Drafting / Writing	Proposed order on sealing/pseudonyms with SL (.5); proposed order on SJ (.5).
10/25/16	3	Editing	Proposed sealing order, protective order, memo of law in support of sealing order.
10/25/16	0.3	Email Exchange/Review	Correspondence with team re plan for call with AG; scheduling; proposed orders.
10/26/16	2.5	Editing	Editing proposed confi agreement/protective order; proposed orders on SJ; final pseudonymity/sealing memo of law.
10/26/16	0.3	Email Exchange/Review	Correspondence re proposed orders; text of proposed protective order/confi agreement.
10/26/16	0.5	Conference Call	Call with ACLU-MS re amicus brief; with AA.
10/27/16	2	Editing	Clean up proposed protective order; finalize briefs.
10/27/16	0.5	Email Exchange/Review	Correspondence with AG and with team re confi agreement and sealing.
10/28/16	1.5	Editing	Editing protective order to address AG's concerns; cite-checking and clean up of briefs and sealing orders.
10/28/16	0.5	Email Exchange/Review	Correspondence with team and with AG's office re confidentiality/pseudonyms/sealing.
10/31/16	1.5	Email Exchange/Review	Correspondence re cleanup of briefs and next steps with AG's office.
10/31/16	0.5	Editing	Cite checking and proofing class cert and msj.
11/1/16	0.5	Email Exchange/Review	Communication with team re scheduling and with AG's office re motions/protective order.
11/1/16	1	Editing	Review and clean up of class cert MOL & Decl.

11/2/16	0.3	Email Exchange/Review	Email to MS re class cert; to team re filing of briefs; with AG's office re pseudonyms and sealing.
11/2/16	0.8	Editing	Cleanup of class cert and numerosity, with AA.
11/3/16	0.5	Editing	Final cleanup.
11/3/16	0.2	Client Communication	Call with AA.
11/3/16	0.5	Email Exchange/Review	Emails re scheduling, filing, responses from AG, amicus.
11/10/16	0.2	Email Exchange/Review	Correspondence re scheduling.
11/15/16	0.2	Email Exchange/Review	Correspondence re arrangements for court conference on 11/21.
11/17/16	1	Conference Call	
11/18/16	0.3	Email Exchange/Review	Correspondence with AG's office and with team re discovery motion to be filed by AG.
11/18/16	0.5	Document Review	Review of discovery motion.
11/20/16	0.2	Email Exchange/Review	Correspondence with team re Ds' motion for discovery and effect on our motions.
11/21/16	0.3	Email Exchange/Review	Correspondence re plan for court telephone conference.
11/21/16	0.5	Research	Cases cited by Defendants in discovery motion.
11/21/16	0.6	Court Appearance	
11/21/16	1.5	Court Preparation	
11/21/16	0.3	Client Communication	Calls with LA, CM, SL re updates to case.
11/21/16	0.5	Conference Call	Debrief with team; assignment of opposition and reply briefs.
11/22/16	0.2	Email Exchange/Review	Scheduling call with team and with AG.
11/23/16	0.1	Email Exchange/Review	Scheduling call with team and with AG.
11/23/16	0.5	Document Review	Review of papers filed by AG.

11/27/16	0.5	Document Review	Review of Ds' motion for discovery. Call with team and with AG's office re
11/28/16	1.1	Conference Call	pseudonymity, conferring, etc.
11/28/16	0.5	Document Review	Prep for call with AG's office.
11/28/16	4	Drafting / Writing	MSJ reply.
11/28/16	0.3	Discuss	With AA plan for call with PB.
11/28/16	0.3	Email Exchange/Review	Correspondence re motion for discovery with team (.2); re call in number with AG's office (.1).
11/29/16	3.5	Drafting / Writing	MSJ reply & Pseud reply.
11/29/16	1	Editing	SJ reply.
11/30/16	1.5	Research	Cases for pseudonymity.
11/30/16	4	Drafting / Writing	Pseudonymity reply.
11/30/16	2.5	Editing	Pseudonymity reply (1.5) & SJ reply (1.0).
11/30/16	0.2	Email Exchange/Review	Correspondence with team re all four briefs being filed on 12/1.
12/1/16	2.5	Editing	Pseudonymity, opp to discovery.
12/1/16	1	Drafting / Writing	Pseudonymity.
12/1/16	1	Filing	Finalizing and filing replies to class cert, pseudonymity, and SJ, and opposition to discovery.
12/2/16	0.3	Client Communication	Call with AA.
12/6/16	0.5	Research	Review of cases sent by defendants to court re pseudonymity.
12/6/16	0.2	Email Exchange/Review	Correspondence re response to defendants' cases, protective order.
12/7/16	2.5	Drafting / Writing	Letter response to Michigan cases submitted to judge via email re pseudonymity.
12/7/16	0.2	Email Exchange/Review	Correspondence re pseudonymity, protective order, extension by defendants.

12/8/16	0.5	Editing	Finalize letter to court re Michigan cases submitted by defendants against pseudonymity.
12/12/16	0.5	Meeting	Meet with BA, AA, SL re next steps in litigation.
12/21/16	0.1	Email Exchange/Review	Email re protective order.
12/21/16	0.2	Email Exchange/Review	Edits to proposed protective order. With AA re coverage while gone and tasks to be done.
12/22/16	0.3	Meeting	done.
12/22/16	0.5	Conference Call	Call with AA, MS, JH, CD, SL. With team re scheduling and protective order;
12/22/16	0.3	Email Exchange/Review	with AG's office re protective order.
1/5/17	0.1	Client Communication	Call with AA.
1/5/17	0.1	Email Exchange/Review	Scheduling.
1/12/17	0.1	Email Exchange/Review	Correspondence re scheduling.
3/9/17	0.1	Telephone Call	Email correspondence re scheduling.
3/10/17	0.2	Telephone Call	Call with AA.
4/7/17	0.2	Client Communication	Call with AA. Review of court orders on pseudonymity, SJ, and CC.
6/2/17	0.5	Document Review	Correspondence with team re court order and scheduling.
6/2/17	0.5	Email Exchange/Review	scheduling.
6/5/17	1	Client Communication	Spoke with all plaintiffs re court orders. Call with AA, SL, CD, MS, RMCD, JH re next steps following court orders.
6/5/17	0.5	Conference Call	following court orders. Further discussion with CCR team (AA, SL, CD) re next steps.
6/5/17	0.3	Discuss	next steps.
6/5/17	0.5	Editing	Protective order.

6/6/17	0.5	Editing	Draft AEO order and circulation to team.
6/8/17	0.1	Email Exchange/Review	Correspondence with team re discovery/protective order process.
6/9/17	0.3	Client Communication	Call with AA.
6/12/17	0.5	Conference Call	Call with AG's office re protective order and discovery.
6/16/17	0.1	Conference Call	Correspondence with AG's office re protective order.
6/28/17	0.5	Document Review	Review of AG's edits to protective order.
6/28/17	0.2	Email Exchange/Review	Emails re scheduling & protective order.
6/29/17	0.8	Conference Call	Call with JH & MS re next steps in discovery.
6/30/17	0.1	Email Exchange/Review	Email to AG's office re protective order.
7/13/17	0.5	Conference Call	Call with team re next discovery steps.
7/14/17	0.1	Email Exchange/Review	Email to AG's office about protective order.
7/17/17	0.1	Email Exchange/Review	Correspondence re discovery.
7/19/17	0.2	Email Exchange/Review	Re draft discovery requests.
7/19/17	1	Editing	Review of draft discovery (rogs, production, RFAs). With team re scheduling & with AG's office re
7/20/17	0.1	Email Exchange/Review	planning for TCMC.
7/20/17	0.5	Conference Call	Re case management conference, discovery.
7/21/17	0.1	Email Exchange/Review	With AG's office re scheduling.
7/24/17	0.2	Email Exchange/Review	Scheduling with AG; substance of case management order with MS.

7/25/17	0.1	Email Exchange/Review	Scheduling call with team & AG's office.
7/25/17	1	Conference Call	Call with AG's office.
7/25/17	0.5	Telephone Call	Call with MS to prep for call with AG.
7/31/17	0.3	Email Exchange/Review	Finalizing signatures on protective order.
8/2/17	0.5	Editing	Review of CMO.
8/2/17	0.2	Email Exchange/Review	Correspondence with AG's office re protective order (.1) and with team re CMO (.1).
8/7/17	1	Drafting / Writing	Confidential settlement memo to Judge Ball.
8/8/17	2.5	Drafting / Writing	Confidential settlement memorandum.
8/8/17	0.1	Email Exchange/Review	Emails to AG's office re CMO; with Judge Ball's chambers re: confi settlement memo and joint case management proposal.
8/9/17	0.1	Email Exchange/Review	Scheduling with team.
8/15/17	0.2	Telephone Call	
8/15/17	0.5	Court Preparation	Prep for TCMC with Judge Ball.
8/15/17	0.5	Conference Call	TCMC with Judge Ball.
8/17/17	0.5	Drafting / Writing	Motion for entry of protective order.
8/17/17	0.5	Editing	Revised protective order.
8/17/17	0.2	Email Exchange/Review	Email to team (.1) and to AG's office (.1) re protective order and submission to court.
8/18/17	0.2	Email Exchange/Review	Correspondence re protective order.
8/30/17	0.1	Email Exchange/Review	Correspondence with MS re discovery timing.
9/5/17	0.5	Editing	Editing interrogatories and RFPs.
9/6/17	0.1	Email Exchange/Review	With court staff attorney re protective order and with team re rogs/RFAs.
9/6/17	0.8	Client Communication	Calls with plaintiffs re next steps in litigation.

9/6/17	0.5	Editing	Review and comments on RFAs. Correspondence with court and with co-counsel
9/7/17	0.2	Email Exchange/Review	re protective order.
9/8/17	0.2	Email Exchange/Review	Correspondence re initial disclosures.
9/8/17	0.2	Drafting / Writing	Notice of service of disclosures.
9/8/17	0.2	Filing	Filing notice of initial disclosures.
9/12/17	1	Research	Amendment of pleadings; additional claim. Call re deadline to amend
9/13/17	1	Conference Call	pleadings/amendments.
9/13/17	0.3	Email Exchange/Review	Re amendment of pleadings.
9/13/17	2	Research	Amendment of pleadings; additional claim.
9/14/17	0.8	Drafting / Writing	Motion to extend time to amend pleadings.
9/14/17	0.2	Filing	Motion for extension of time.
9/19/17	0.2	Email Exchange/Review	Correspondence with team re RFAs.
9/19/17	5	Editing	Review of RFAa. Correspondence re protective order with team;
9/20/17	0.2	Email Exchange/Review	with AG's office re their need to amend.
9/21/17	0.2	Telephone Call	Call with docketing clerk re protective order. Correspondence re restricted access in protective
9/21/17	0.4	Email Exchange/Review	order with team, amicus counsel, and AG's office. Call with docketing clerk re "restricted access" v
9/26/17	0.1	Telephone Call	"under seal." Correspondence re amendment to protective
9/26/17	0.2	Email Exchange/Review	order and possible amendment of claim for one plaintiff.
9/26/17	0.5	Drafting / Writing	Motion to amend protective order.

9/26/17	0.5	Filing	Finalizing and filing motion to amend protective order.
9/27/17	0.8	Telephone Call	Call with SK (.5) call with SL (.3) re resources for case.
9/28/17	0.2	Email Exchange/Review	Correspondence re scheduling and discovery.
10/3/17	0.2	Email Exchange/Review	With team re scheduling and amending complaint.
10/4/17	0.5	Telephone Call	Conf call.
10/4/17	0.2	Email Exchange/Review	Correspondence with SK re amendments.
10/10/17	0.3	Editing	Proposed protective order.
10/11/17	0.2	Editing	Joint statement on motions.
10/11/17	1	Drafting / Writing	Motion to amend and FAC.
10/11/17	0.2	Email Exchange/Review	With team re motion to amend and protective order; with AG's office re same.
10/12/17	0.2	Email Exchange/Review	With team re scheduling; with AG's office re motion to amend and protective order.
10/12/17	0.1	Telephone Call	With Arthur Doe.
10/13/17	0.5	Drafting / Writing	MOL ISO Motion to amend.
10/13/17	1.2	Editing	Protective order (1.0); motion to amend (.2).
10/13/17	0.5	Filing	Motion to Amend complaint.
10/13/17	0.5	Email Exchange/Review	Correspondence with team, AG and court re protective order; with AG re motion to amend.
10/16/17	0.1	Drafting / Writing	Certificate of service re MOL ISO Motion to Amend complaint.
10/16/17	0.1	Document Review	Review of court order permitting amendment of protective order.
10/18/17	0.2	Email Exchange/Review	Correspondence re gov't request for discovery extension.
10/23/17	0.1	Document Review	Review of court order.

10/26/17	0.1	Email Exchange/Review	Correspondence re discovery and scheduling. Correspondence with BA re brief on timing of
10/29/17	0.1	Email Exchange/Review	motio to compel.
10/30/17	0.3	Client Communication	Call with Arthur Doe.
10/30/17	0.1	Email Exchange/Review	Correspondence with team re discovery. With team re scheduling and review of
11/2/17	0.2	Email Exchange/Review	discovery. Correspondence with team re Green v Georgia
11/4/17	0.2	Email Exchange/Review	case.
11/6/17	0.8	Conference Call	Review of discovery and next steps.
11/6/17	0.5	Document Review	Review of production, interrogatories, RFAs.
11/13/17	0.5	Editing	Edits to discovery requests.
11/13/17	0.3	Discuss	Production chart/sorting.
11/13/17	0.3	Document Review	Review of docs.
11/13/17	0.1	Email Exchange/Review	To SL re chart.
11/16/17	0.1	Email Exchange/Review	Scheduling.
11/16/17	0.4	Conference Call	Call with SK & MS re discovery responses.
11/20/17	0.2	Document Review	Review of SL's draft chart on class members.
11/20/17	0.1	Email Exchange/Review	Correspondence with SL re discovery chart. Correspondence with JH re expert witness
11/21/17	0.2	Email Exchange/Review	report.
11/30/17	0.2	Email Exchange/Review	With team re scheduling and re class members.
12/1/17	1	Document Review	Call re discovery plans and review of docs. Review of class member chart and underlying
12/4/17	0.5	Document Review	docs.

12/4/17	0.3	Telephone Call	With Alexis A. re fact witnesses and expert witness; with court clerk in Hinds county re files (.1).
12/4/17	0.4	Discuss	Discovery process with SK(.2); discovery chart with SL (.2)
12/5/17	0.3	Discuss	Discovery chart with SL.
12/5/17	3	Document Review	Editing of chart summarizing class members; review of underlying docs produced by AG's office; review of draft expert report from Rudder.
12/5/17	0.7	Telephone Call	Call with potential expert W. Eskridge (.6); with second court clerk at Hinds county re files (.1).
12/5/17	0.2	Client Communication	Call with AA re underlying conviction.
12/5/17	0.3	Email Exchange/Review	Correspondence re discovery process, experts.
12/6/17	0.2	Client Communication	Call with A Doe.
12/7/17	1.5	Editing	Editing discovery responses.
12/7/17	0.1	Email Exchange/Review	Scheduling and draft responses.
12/7/17	0.5	Conference Call	Call with team re next steps in discovery.
12/7/17	0.3	Client Communication	Calls with E Doe C Doe, message for D Doe, A Doe.
12/11/17	0.5	Discuss	Process of getting verifications done with Claire.
12/12/17	0.5	Discovery	Review chart of Doe v. Caldwell clients for interrogatory response re class members.
12/12/17	1	Client Communication	Calls with Brenda and Elizabeth Doe re interrogatory responses; messages to Diana Doe. Messages from Carol Doe.

12/12/17	2.5	Drafting / Writing	Review relevant documentation and draft interrogatory responses for individuals plaintiffs.
12/13/17	1	Client Communication	Calls with Brenda re receipt of interrogatory responses & verification; with Carol and Diana re answers to interrogatory responses.
12/13/17	1	Drafting / Writing	Review relevant documents and draft interrogatory responses for named plaintiffs.
12/14/17	0.3	Email Exchange/Review	Correspondence with team re Ps' discovery responses.
12/14/17	0.7	Discovery	Prep of interrogatory responses and verifications; coordination with CD re verification mailing
12/14/17	1	Conference Call	Team call re discovery; review of chart of class members.
12/15/17	1	Discovery	Preparation of responses to interrogatories; emails with team re logistics for verifications in Jackson; emails with CD re pickups and fedexes of verifications in Jasper.
12/15/17	1	Conference Call	Call with SL & MS re designation of class members.
12/15/17	0.4	Email Exchange/Review	Correspondence re: verification coordination, discovery/class member chart, open records requests.
12/19/17	1	Discovery	Coordinating with plaintiffs to collect verifications for interrogatories and emailing same to team.
12/20/17	0.5	Email Exchange/Review	Correspondence re verifications and records requests.
12/21/17	1.5	Discovery	Preparation of final interrogatory responses.

1/4/18	0.2	Email Exchange/Review	Scheduling calls with team.
1/8/18	1	Conference Call	Team call re deposition and witnesses.
1/11/18	0.7	Conference Call	Deposition planning with team.
1/11/18	1.3	Drafting / Writing	Outline of deposition topics (.5); Public records request for prostitution convictions (.8).
1/11/18	0.2	Email Exchange/Review	Correspondence with SK re class members.
1/12/18	0.3	Email Exchange/Review	Correspondence re scheduling.
1/17/18	0.2	Email Exchange/Review	Correspondence re deposition planning.
1/17/18	0.5	Conference Call	Call with AG's office re deposition scheduling.
1/31/18	0.1	Email Exchange/Review	With AG's office re scheduling and court order.
2/1/18	0.2	Telephone Call	Call with Wade White of Neshoba County re deposition of Ralph Sciple.
2/1/18	0.1	Telephone Call	Call with Claire re upcoming call on depositions; message for AG's office re; same.
2/1/18	0.1	Email Exchange/Review	Email with Rob re upcoming depositions.
2/1/18	0.2	Conference Call	Conference call with team re deposition scheduling and court order.
2/2/18	0.2	Drafting / Writing	Draft letter to court re clarification of court order re jury trial.
2/2/18	0.3	Email Exchange/Review	With team re discovery and deposition coordination; with AG's office re clarification of court order; correspondence with team re call with Paul Barnes.
2/2/18	0.5	Telephone Call	Call with PB re depo dates, settlement, etc.

2/2/18	0.3	Telephone Call	With Paul Barnes of AG's office re deposition scheduling, witnesses, possible settlement.
2/5/18	0.2	Email Exchange/Review	Correspondence within team re discovery and upcoming depositions; with PB re letter to court.
2/5/18	0.8	Drafting / Writing	RFPs and Interrogatories to Hill & Hood re process for removal from registry.
2/5/18	0.5	Discuss	Settlement ideas with BA.
2/6/18	0.4	Email Exchange/Review	Review of correspondence re potential settlement and attorneys' fees with team (.2); correspondence with team re discovery to be served (.1); correspondence with AG's office re revisions to letter motion to clarify court order (.1).
2/6/18	0.3	Drafting / Writing	Editing RFPs and Interrogatories.
2/6/18	0.2	Filing	File motion to clarify court order re trial.
2/7/18	0.1	Email Exchange/Review	With Paul re deposition scheduling,
2/7/18	0.1	Telephone Call	With Brooks deposition company re schedule.
2/8/18	0.1	Email Exchange/Review	Correspondence with team re scheduling and APA research topics, incl. length/extension of comment period.
2/9/18	2.5	Drafting / Writing	Draft settlement memo in advance of 2/15 conference with Judge Ball.
2/9/18	0.2	Email Exchange/Review	With team re draft subpoena for Neshoba county; with AG's office and Neshoba county lawyer re deposition scheduling.
2/10/18	0.5	Editing	Draft settlement memo for conference with Judge Ball.

2/12/18	0.5	Email Exchange/Review	Scheduling of settlement discussions; correspondence with Jolley re deposition logistics.
2/13/18	0.3	Telephone Call	Call with Brooks deposition company re set up of our depositions and notices.
2/13/18	0.2	Email Exchange/Review	correspondence with Neshoba county lawyer re deposition; with team re agenda/tasks for settlement and depositions.
2/13/18	0.2	Discuss	Meet with CD re tasks for notices, prep for trip to depose and settle.
2/13/18	0.5	Editing	Edit and email deposition notices (.3); edit settlement memo (.5).
2/14/18	2	Email Exchange/Review	Notices of deposition, arranging for times with Brooks court reporter and attorneys from county.
2/14/18	0.5	Editing	Settlement memo.
2/14/18	1	Conference Call	Team call re prep for settlement; depositions.
2/14/18	0.2	Email Exchange/Review	Correspondence re deposition logistics.
2/15/18	0.2	Email Exchange/Review	Settlement memo to Judge Ball; deposition logistics with AG's office.
2/15/18	0.2	Discuss	Tasks in prep for trip with CD.
2/15/18	2	Deposition prep	Review of docs for deposition of DPS staff & DPS director.
2/18/18	1.5	Deposition prep	Draft deposition outlines.
2/20/18	3	Deposition prep	Gathering docs and finalizing deposition outlines.
2/20/18	8	Travel	Travel to Jackson.
2/21/18	1	Court Preparation	Meet with RM, SL, MS re next day's court conference.
2/21/18	1.5	Deposition prep	Prep of depositions of LJ & CH.

2/21/18	8.5	Deposition	Deposition of Lori Jones (3); Deposition of Charlie Hill (5.5).
2/21/18	0.2	Client Communication	Call with Arthur Doe re deposition scheduling.
2/22/18	1	Court Preparation	Prep of draft settlement agreement.
2/22/18	5	Court Appearance	Settlement conference with Judge Ball; negotiation of confidential MOU re CANS plaintiffs.
2/22/18	0.3	Email Exchange/Review	Correspondence with team re settlement.
2/22/18	0.5	Client Communication	Calls with CM, LA; attempts to reach SL, MB re settlement.
2/23/18	0.5	Administrative	Drop off of documents to be shredded at Rob's office.
2/23/18	0.2	Client Communication	Call with SL re settlement.
2/23/18	7	Travel	Travel from Jackson to NYC.
2/26/18	0.2	Editing	Settlement stip.
2/26/18	0.8	Conference Call	Call with team and AG's office re settlement (.4); and outstanding claimants with UI convictions (.3).
2/26/18	0.7	Conference Call	With SK next steps re UI people.
2/26/18	0.3	Discuss	Correspondence re stip to be sent to government.
2/26/18	0.2	Email Exchange/Review	Call with team and AG's office re global settlement.
2/27/18	0.2	Conference Call	Discussions with SK, SL, CD re proposed settlements.
2/27/18	0.5	Discuss	Settlement agreement.
2/27/18	0.1	Editing	Correspondence with gov't re stip on LA CANS plaintiffs.
2/27/18	0.1	Email Exchange/Review	Call with MB re removal from registry.
2/27/18	0.2	Client Communication	

2/27/18	0.2	Email Exchange/Review	Correspondence with team re proposed settlement for UI.
2/28/18	0.4	Court Appearance	Call with AG's office and Judge Ball.
TOTAL	332.6	46.3	

Exhibit C

Timekeeper: Alexis Agathocleous

Date	Hours	Travel	Task	Comment
1/8/16	1.2		Meeting	w/GS re: complaint, class cert motion, PI motion, pseudonymity, timing
1/14/16	1		Meeting	call with co-c re: claims, plaintiffs, filing
1/15/16	2.5		Review	motion for PI
2/2/16	1		Review	complaint
2/3/16	2.6		Review	motion for PI
2/4/16	1.1		Telephone Call	w/co-c re: complaint, motion for PI, class cert motion, filing plans
2/29/16	1.2		Drafting / Writing	prep for negotiations with AG's office
2/29/16	0.5		Telephone Call	w/lit team re: negotiation with AG's office
			Email	
3/3/16	0.1		Exchange/Review	re: call w/AG's office
3/8/16	1		Meeting	w/GS re: claims, legal theories, plaintiffs, filing plan
3/8/16	1		Telephone Call	w/lit team re: claims, legal theories, plaintiffs, filing plan
3/8/16	1		Research	procedural due process claims
3/10/16	1		Meeting	w/BA, GS, ZM re: legal claims and motions
3/16/16	1		Telephone Call	w/co-c re: Mtn for PI, complaint allegations, filing plans
3/23/16	0.8		Meeting	w/Chemerinsky re: claims
3/23/16	1.6		Drafting / Writing	PI motion
3/24/16	0.5		Drafting / Writing	PI motion
3/24/16	0.5		Meeting	w/GS re: legal theories for PI motion
3/30/16	4.3		Review	PI motion
4/1/16	0.8		Telephone Call	call w/Erwin Chemerinsky
4/12/16	0.5		Meeting	w/GS re: PI motion, pseudonymity motion, amicus strategy
4/29/16	0.8		Telephone Call	w/Katherine Franke re: claims
5/4/16	0.5		Telephone Call	w/consultant re: claims
5/17/16	0.3		Research	cert petition re: Lawrence
5/19/16	1		Meeting	w/co-c and ACLU attys re: legal theories, strategy, amicus
5/23/16	0.6		Meeting	w/GS re: timing of filing

6/8/16	0.8	Meeting	w/interns re: legal research for PI motion and legal theory w/co-c re: amicus strategy, legal claims, filing plans, plaintiff
6/22/16	0.8	Telephone Call	meetings w/law student re: researching challenges to sodomy statutes
6/23/16	0.5	Meeting	nationally
6/29/16	0.8	Telephone Call	w/DOJ re: statement of interest
6/30/16	0.6	Telephone Call	re: amicus
6/30/16	0.4	Drafting / Writing	memo re: amicus strategy and DOJ involvement
		Email	
6/30/16	0.3	Exchange/Review	to Lambda atty re: amicus
7/21/16	0.5	Meeting	w/co-c (GS) re: reviewing pleadings, amicus strategy
7/27/16	0.9	Review	draft complaint editing
7/28/16	2.8	Research	Heck preclusion
8/1/16	1.9	Research	Heck's applicability reviewing student research memo on sodomy statutes post-
8/3/16	0.6	Review	Lawrence
8/15/16	1.5	Meeting	w/co-c re: legal theories, filing plans, trip to MS, finalizing filings
8/15/16	0.8	Review	pseudonymity motion
8/16/16	1.9	Review	pseudonymity motion
8/17/16	0.8	Review	PI motion
8/18/16	1.6	Review	PI motion
8/31/16	0.5	Telephone Call	w/DOJ atty re: litigation
9/13/16	0.5	Meeting	w/co-c re: planning trip to MS to meet with plaintiffs
9/18/16	2	Meeting	w/community group re: litigation
9/18/16		8 Travel	to Jackson
9/19/16	4.5	Meeting	w/plaintiffs and co-c
9/19/16		6.5 Travel	to meet w/plaintiffs and co-c
9/20/16	1.5	Meeting	w/plaintiff and co-c
9/20/16		8 Travel	for meeting w/plaintiff and co-c
9/21/16	4.5	Meeting	w/plaintiffs and co-c
9/21/16		8.8 Travel	to NYC

9/26/16	0.8	Research	retrieving docs to establish standing
9/26/16	1	Meeting	w/co-c re: filing plans, MSJ, exhibits
9/28/16	0.7	Review	Ps' conviction and registry records for standing purposes
9/28/16	1.9	Meeting	w/co-c re: MSJ, filing plans, pseudonymity, plaintiffs
		Email	
9/30/16	0.2	Exchange/Review	to co-c re: class cert declarations
			w/co-c re: SJ motion, class cert motion, pseudonymity motion,
10/4/16	1	Meeting	plaintiffs, timing of filing
10/5/16	0.5	Meeting	w/SL re: pseudonymity motion
10/5/16	3	Editing	SJ motion
			w/co-c re: filing, sequencing of briefs, substance of post-complaint
10/6/16	0.5	Meeting	filings
10/6/16	1	Meeting	w/co (GS, SL) re: MSJ
10/7/16	3.5	Editing	MSJ
10/10/16	2.2	Editing	
10/11/16	2	Editing	class cert
10/12/16	0.3	Meeting	w/co-c SL re: pseudonymity motion
10/12/16	1	Drafting / Writing	decl ISO motion for SJ
10/17/16	0.5	Telephone Call	w/potential amici
10/18/16	0.6	Drafting / Writing	MSJ
10/19/16	1.2	Drafting / Writing	
10/20/16	0.8	Review	pseudonymity motion
10/21/16	0.5	Meeting	w/co-c re: MSJ
10/24/16	1.2	Meeting	w/co-c re: finalizing MSJ, MCC, MFS
10/24/16	0.6	Drafting / Writing	protective order
10/25/16	0.5	Meeting	w/co-c re: finalizing filings
10/25/16	0.5	Telephone Call	w/opp c re: MSJ, pseudonymity, filing under seal
10/26/16	0.2	Telephone Call	w/amici
10/28/16	0.3	Review	
			w/co-c re: class cert, pseudonymity, filing plans, negotiations
10/31/16	0.5	Meeting	w/opp c

11/1/16	0.8	Meeting	w/co-c re: class cert, pseudonymity, summary judgment
11/1/16	0.8	Drafting / Writing	MSJ
			w/co-c re: class cert motion and declarations, pseudonymity
11/2/16	1	Meeting	motion
11/2/16	0.1	Drafting / Writing	class cert mtn
11/2/16	2	Review	class cert, MSJ, pseudonymity motions for filing
11/3/16	2.7	Review	finalizing and filing pseudonymity, SJ, class cert motions
11/10/16	0.5	Telephone Call	w/co-c re: status conference & motion schedule
11/21/16	0.5	Court Appearance	status conference w/Magistrate Judge Ball
11/21/16	0.5	Telephone Call	w/co-c re: status conference
11/22/16	0.7	Review	Ds opposition briefs
11/28/16	0.6	Review	opp to Ds motion for discovery
			w/Ds re: potential resolution of pending motions; follow-up mtg
11/28/16	1.2	Telephone Call	w/co-c re: meeting w/Ds.
			Ps opp to Ds motion for discovery; Ps reply ISO class certification;
11/30/16	4	Review	Ps reply ISO summary judgment
			review, finalizing, filing replies ISO class cert, SJ, pseudonymity,
12/1/16	6	Review	and opp to Ds motion for discovery
			Ltr brief in response to Ds email to Magistrate Judge re:
12/7/16	0.3	Review	pseudonymity
12/12/16	0.8	Meeting	w/co-c re: pending motions, strategy for next steps
		Email	
12/15/16	0.2	Exchange/Review	w/co-c re: protective order
12/19/16	0.5	Meeting	w/co-c re: exhibits ISO SJ
6/5/17	0.5	Telephone Call	re: protective order, discovery, next steps
		Email	
6/5/17	0.1	Exchange/Review	re: protective order
		Email	
6/6/17	0.1	Exchange/Review	re: protective order
7/13/17	0.5	Telephone Call	w/co-c re: case management conference, case memo to court
TOTALS	110.8	31.3	

Exhibit D

Stephanie Llanas

entry date	time	travel	task	comment
10/10/16	0.3		Drafting / Writing	drafting pseudonimity motion
10/10/16	0.3		Meeting	Meeting about filing timeline
10/11/16	2.8		Drafting / Writing	Drafting pseudonym motion
10/12/16	0.4		Meeting	Meeting with Alexis to discuss pseduo motion
10/12/16	5.8		Editing	Editing Motion for pseudo
10/13/16	1		Telephone Call	Conference call to discuss litigation strategy moving forward
10/13/16	3.3		Editing	Editing motion for pseudo
10/14/16	4		Editing	Editing pseudo motion for Mississippi case
10/17/16	0.5		Telephone Call	Call with Jenner & Block to discuss amicus brief
10/17/16	5.8		Editing	Editing pseudo motion
10/20/16	1		Telephone Call	Call with co-counsel on strategy moving forward
				Internal meeting to discuss litigation strategy moving forward-
10/24/16	1.2		Meeting	-summary judgment, motion to proceed under seal and pseudo, motion for class cert.
				Drafting Motion for Pseudo/Under Seal and researching
10/24/16	5.4		Drafting / Writing	relevant case law for under seal int he 5th Cir.
10/25/16	0.7		Conference Call	Call with opposing counsel on litigation moving forward
10/25/16	0.7		Meeting	Internal debrief from conference call
				Drafting Proposed Order for Pseudo/Under Seal Motion with
10/25/16	1		Drafting / Writing	Ghita
				Researching 5th Cir. and other circuits on case law for sealing
10/25/16	2.9		Research	records
10/25/16	1.3		Editing	Editing motion and memo of law
10/26/16	0.3		Telephone Call	Call with Paloma from the ACLU to discuss amicus brief
				Research local rules on electronic signatures for electronic
10/27/16	0.6		Research	filing
11/10/16	2.1		Review	Reviewing amicus brief filed

11/10/16	0.5	Telephone Call	Call with co-counsel about strategy moving forward
11/21/16	1.5	Review	Reviewing D's answer to pseudo motion
11/21/16	1	Meeting	Debrief meeting with CCR team and co-counsel on magistrate judge call
11/21/16	0.5	Meeting	Prepping for call with magistrate judge
11/21/16	0.5	Conference Call	Conference call with Judge Ball
11/28/16	1	Meeting	Meeting to discuss assignment--draft part of the reply brief (pseudo)
11/28/16	1.1	Telephone Call	Call with AG and co-counsel
11/28/16	4	Drafting / Writing	researching and drafting reply brief for Doe
11/29/16	3	Drafting / Writing	Researching and drafting pseudo section of reply brief
11/30/16	4	Editing	Editing and cite checking briefs
12/19/16	1	Meeting	Document discussion before Alexis vacation
12/22/16	2	Review	Reviewing protective order
12/22/16	1	Telephone Call	Call with co-counsel to discuss case strategy moving forward
6/5/17	1	Telephone Call	Call with co-counsel to discuss judge's order
6/7/17	0.5	Review	Reviewing AEO protective order
7/13/17	1	Telephone Call	Team call
8/24/17	1	Telephone Call	Team Call
9/26/17	1	Telephone Call	Call with Ghita to discuss Doe work moving forward
10/4/17	1	Telephone Call	Call with co-counsel
11/7/17	1	Drafting / Writing	working on doc production chart
11/9/17	1	Telephone Call	Team call
11/10/17	3	Drafting / Writing	working on doc production chart
11/13/17	3	Drafting / Writing	working on doc production chart
11/14/17	2	Drafting / Writing	doc production chart
11/28/17	1	Drafting / Writing	working on doc production chart
11/30/17	1	Drafting / Writing	working on doc production chart
12/4/17	6.5	Drafting / Writing	Working on production chart

12/4/17	1	Meeting	Meeting with Ghita to go over production chart
12/4/17	1	Editing	Editing chart with Ghita's comments
			Researching specific people in the production and making final
12/5/17	2	Editing	edit to chart
12/8/17	1	Document Review	Reviewing interrogatories and emails
12/14/17	1.5	Telephone Call	Legal team call
12/15/17	1	Telephone Call	Call with co-counsel to discuss potential plaintiff class
1/8/18	1	Telephone Call	Litigation team call--depositions
1/17/18	1	Telephone Call	Depositions call with AUSA's
1/29/18	0.5	Email Exchange/Review	Related to scheduling of depositions
2/1/18	0.5	Telephone Call	Team call
2/8/18	2	Research	Deposition research
2/9/18	4	Research	Depositions prep
2/14/18	1	Telephone Call	Call re: depositions
2/20/18		7 Travel	Travel to Jackson, MS for depositions
2/20/18	1.5	Drafting / Writing	Drafting settlement agreement
2/21/18	9	Deposition	2 depositions--Lori Jones and Charlie Hill
2/22/18	0.5	Drafting / Writing	Editing settlement and emailing team
2/22/18	5	Court Appearance	Settlement conference with magistrate judge
2/22/18	1.5	Court Preparation	Prepping for settlement with team
2/23/18		10 Travel	Travel back to NYC
2/26/18	1	Telephone Call	litigation team call
2/26/18	1	Telephone Call	Call with AUSA in preparation for settlement conference call
2/28/18	1	Court Appearance	Settlement Call
2/28/18	1	Meeting	Team call before settlement call
totals	125.5	17	

Exhibit E

Claire Dailey

entry date	time	task	comment
10/12/16	3	Meeting	meeting w/aa re exhibit/redaction for filing
10/12/16	1	Administrative	working on docs for filing
10/13/16	0.6	Meeting	team meeting re filing plans/timing/tasks
10/13/16	2.5	Administrative	working on docs for filing
10/14/16	3.5	Administrative	working on docs for filing
10/16/16	3.7	Administrative	working on SJ for filing
10/17/16	1.5	Administrative	working on SJ
10/18/16	1.2	Administrative	work on SJ docs
10/20/16	0.6	Meeting	team call/meeting
10/21/16	0.7	Administrative	discussion about & setting up meeting
10/23/16	1.3	Administrative	reviewing docs for filing
10/24/16	4.7	Administrative	reviewing docs for filing - class cert, pseudonymity, summary judgment
11/21/16	0.5	Conference	phone conference with opposing and magistrate
11/21/16	0.6	Meeting	meeting with CCR and strugar post magistrate conf.
11/28/16	1.1	Conference	call with opposing counsel
11/28/16	0.5	Administrative	back and forth re scheduling
11/29/16	0.2	Meeting	phone call/meeting with cocounsel
11/30/16	9.3	Administrative	reviewing, cite checking, formatting etc of upcoming filings
12/1/16	7.2	Administrative	reviewing, cite checking, formatting etc briefs to be filed
12/19/16	0.5	Meeting	ccr team check in on standing documents
12/22/16	0.5	Meeting	team-wide call check in
6/5/17	0.7	Meeting	team call re recent decisions
6/12/17	0.4	Meeting	phone call w/opposing counsel
6/12/17	0.2	Meeting	phone call w/cocounsel after call w/d's re protective order
7/13/17	0.7	Telephone Call	team call re scheduling conference, protective order
7/20/17	0.5	Meeting	team call
8/3/17	0.3	Administrative	pdf compiling of filing

8/15/17	0.7 Administrative	conference call set up
8/15/17	0.5 Conference Call	phone meeting with opp counsel and magistrate
8/18/17	0.6 Administrative	editing/assembling pdfs of filings
8/25/17	1.2 Administrative	looking at scheduling order and setting all deadlines into outlook
9/7/17	0.9 Meeting	call w/co-counsel re upcoming litigation deadlines/strategy
11/6/17	1.1 Meeting	team call discussing recent production
12/1/17	1 Meeting	team call re discovery
12/7/17	1 Meeting	team call re discovery
		scheduling/tracking document mailings to/from clients, trying to figure out
12/12/17	2.5 Administrative	address discrepancy
12/13/17	1 Administrative	scheduling/tracking document mailings to/from clients
12/14/17	1.1 Meeting	team call working on interrogatory responses
12/14/17	0.5 Administrative	scheduling/tracking document mailings to/from clients
12/15/17	1 Administrative	scheduling/tracking document mailings to/from clients
12/18/17	0.5 Administrative	scan/share client docs that we recieved today
1/8/18	0.7 Meeting	team phone call/meeting re discovery
1/11/18	0.8 Meeting	team meeting/phone call re discovery, scheduling
1/26/18	0.5 Meeting	team call re discovery deadlines, possible depositions/timing
2/1/18	0.5 Meeting	litigation team phone call re discovery
2/13/18	0.2 Meeting	chat w/GS about discovery related tasks
2/13/18	0.5 Administrative	put together depo notice draft
2/14/18	0.9 Meeting	team meeting/phone call re discovery, settlement discussions
		locating & printing documents for GS depo preparation (1.3) prepping notice
2/15/18	1.8 Administrative	of service of interrogs and RFAs for GS (.5)
2/20/18	2 Deposition prep	prepping depo docs etc for GS
2/21/18	0.5 Deposition prep	depo support - finding info here for GS and SL in Mississippi for depositions
2/26/18	1 Meeting	phone call with cocounsel
2/26/18	1 Conference	teleconference with opposing counsel re potential settlement details

2/27/18	0.5 Conference	teleconference with opposing counsel re potential settlement details
2/28/18	0.5 Administrative	gathering/submitting reimbursement request for cocounsel strugar
	72.5 (0 travel hours)	

Exhibit F

Center for Constitutional Rights

Item Actual Cost Detail

April 30, 1995 through December 20, 2020

Date	Num	Name	Source Name	Memo	Amount
01/05/2016		legal:Racial Justice:Doe v Hood	CitiBusiness Card	Expedia Car Rental Ghita/Zac Mississippi	78.99
01/05/2016		legal:Racial Justice:Doe v Hood	CitiBusiness Card	Hotel.Com Ghita and Zac Mississippi	575.76
01/05/2016		legal:Racial Justice:Doe v Hood	CitiBusiness Card	Delta Airfare Ghita/Zac	720.20
01/05/2016		legal:Racial Justice:Doe v Hood	CitiBusiness Card	Delta Air Ghita/Zac	720.20
01/28/2016	40517	legal:Racial Justice:Doe v Hood	Zachery Morris	Taxi / Rental Car / Gas / Meal - Mississippi - December 2015	285.69
02/04/2016	40547	legal:Racial Justice:Doe v Hood	Fed Ex	515 - Mississippi	106.04
02/18/2016	40594	legal:Racial Justice:Doe v Hood	United Parcel Service	515 Mississippi	16.09
09/01/2016	41313	legal:Racial Justice:Doe v Hood	Alexis Agathocleous	Flights / car rental insurance - Mississippi - for Ghita & Alexis	870.40
09/28/2016	41410	legal:Racial Justice:Doe v Hood	Ghita Schwarz	Food - Mississippi trip - Doe v. Hood	256.18
09/28/2016	41412	legal:Racial Justice:Doe v Hood	Alexis Agathocleous	Hotels / car rental / gas / taxis / food - Mississippi trip (2 staff plus co-counsel)	1,649.51
10/05/2016	41440	legal:Racial Justice:Doe v Hood	Alexis Agathocleous	Breakfast meeting with co-counsel - Mississippi trip	77.18
10/06/2016	41460	legal:Racial Justice:Doe v Hood	Clerk, Appellate Division	Certificate of Good Standing for Alexis Agathocleous, bar # 4227062	5.00
10/06/2016	41461	legal:Racial Justice:Doe v Hood	Clerk, Appellate Division	Certificate of Good Standing for Ghita Schwarz, bar # 3030087	5.00
10/19/2016	41509	legal:Racial Justice:Doe v Hood	Fed Ex	Mississippi	99.04
11/10/2016	41581	legal:Racial Justice:Doe v Hood	McDuff & Byrd	Filing fee and pro hac vice applications - Doe v. Hood (Mississippi)	700.00
11/16/2016	41608	legal:Racial Justice:Doe v Hood	Matthew D Strugar	Flight / Gas / Parking / Meals - Client visits for Doe v. Hood	534.15
11/16/2016	41608	legal:Racial Justice:Doe v Hood	Matthew D Strugar	Certificate of good standing for court admission	25.00
01/03/2018	11135	legal:Racial Justice:Doe v Hood	Fed Ex	Ghita - 12/14/17	47.30
01/03/2018	11135	legal:Racial Justice:Doe v Hood	Fed Ex	Ghita - 12/15/17	37.62
01/03/2018	11135	legal:Racial Justice:Doe v Hood	Fed Ex	Ghita - 12/18/17	37.80
01/29/2018	11216	legal:Racial Justice:Doe v Hood	Clerk of the Court, Southern District NY	Stephanie Llanes Admission Fee	206.00
02/09/2018	11268	legal:Racial Justice:Doe v Hood	Administrative Office of the Courts	Criminal Searches Feb 2018	60.00
03/01/2018	11336	legal:Racial Justice:Doe v Hood	Matthew D Strugar	Flight / Taxis / Food - Mississippi deposition trip - 2/20-2/24/18 - Doe v. Hood	800.29
03/07/2018		legal:Racial Justice:Doe v Hood	Citicard Advantage	Orbitz - Airfare booking fee	8.13
03/07/2018		legal:Racial Justice:Doe v Hood	Citicard Advantage	Orbitz - Airfare booking fee	8.13
03/07/2018		legal:Racial Justice:Doe v Hood	Citicard Advantage	Delta - flight to Jackson MS for Doe v. Hood depositions - Ghita	297.00

1:14 PM
12/15/20

Center for Constitutional Rights

Item Actual Cost Detail

April 30, 1995 through December 20, 2020

03/07/2018	legal:Racial Justice:Doe v Hood	Citicard Advantage	Delta - flight to Jackson MS for Doe v. Hood depositions - Stephanie	297.00
03/07/2018	legal:Racial Justice:Doe v Hood	Citicard Advantage	American - flight from Jackson MS for Doe v. Hood depositions - Ghita	621.50
03/07/2018	legal:Racial Justice:Doe v Hood	Citicard Advantage	American - flight from Jackson MS for Doe v. Hood depositions - Stephanie	621.50
03/07/2018	legal:Racial Justice:Doe v Hood	Citicard Advantage	Hotel_ Ghita, Stephanie M Strugar	365.58
03/07/2018	legal:Racial Justice:Doe v Hood	Citicard Advantage	Hotel _ Ghita, Staphanie, M Strugar	533.72
03/07/2018	legal:Racial Justice:Doe v Hood	Citicard Advantage	Hotel-Ghita, Stephanie, M Strugar	536.67
05/30/2018	11644	legal:Racial Justice:Doe v Hood	Taxi / Flight costs / food - Jackson MS - Doe v. Hood	116.16
				11,318.83

CERTIFICATE OF SERVICE

This is to certify that on this day I, Matthew Strugar, Counsel for Plaintiffs, electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notice of such filing to the following:

WILSON MINOR, MSB No. 102663
Special Assistant Attorney General
State of Mississippi
Office of the Attorney General
Post Office Box 220
Jackson, MS 39205
wmino@ago.state.ms.us

ATTORNEY FOR DEFENDANTS

THIS, the 10th day of December, 2021.

/s/Matthew Strugar
Matthew Strugar