

Exhibit A

STATEMENT OF ITEMS IN DISPUTE

<u>Special Interrogatories (Set Three)</u>	<u>PWS responses applicable to all requests (summarized)</u>	<u>Reason for Further Responses</u>
1 State the total amount you have been billed by any counsel for its services in this matter during the RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.	<i>Confidential:</i> Under Evidence Code 917 communication presumed confidential; B&P Code 6149 a fee contract is confidential; B&P Code 6068 attorney must maintain client confidence	Date, hours, rate, and tasks performed (redacted) in a bill do not reveal privileged confidential information.
2 State the number of hours billed by YOUR counsel on this matter during the RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.	<i>Attorney client privilege</i> under Evidence Code sections 951 to 955	
3 State the number of hours that your in-house counsel has worked on this matter during the RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.	<i>Attorney work product per</i> Los Angeles Bar Ass'n Opinion 456	Defendants put these items in dispute in contesting plaintiff's fee bill.
4 State the total amount you have paid for legal services rendered in this matter during the RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.	<i>In excess of 35</i> interrogatories without declaration per 2030.030(a)(1)	
5 State the billing rate(s) you have paid counsel for their work on this matter during the RELEVANT PERIOD, identifying the extent to which, if at all that rate is a discounted rate.	<i>Failure to capitalize</i> all specially defined terms pursuant to 2030.060(e)	
<u>Production of Documents (Set Three)</u>		
1 Any and all Bills you have received from any counsel during the RELEVANT PERIOD relating to the litigation.	<i>Terms are not defined</i> like "billed" "matter" "other applicable period" or litigation are not defined	
2 Any and all DOCUMENTS that refer or relate to the rates billed by your counsel for their services in this matter.	<i>Burdensome to break down by month</i>	
3 Any and all documents that refer or relate to the accompanying special interrogatories.	<i>Overbroad:</i> Requires disclosure of irrelevant material as it includes a request for information that does not relate to Willis' participation	
4 Any and all documents that refer or relate to any arrangements whereby YOU have shared responsibility for the payment of counsel fees with respect to this litigation.	<i>All irrelevant</i> per Cities of Lancaster and Palmdale	