



**SECOND SUPPLEMENTAL MOTION FOR FEES  
LODESTAR JANUARY 1, 2012 TO DECEMBER 31, 2015**

<u>LODESTAR AT HISTORICAL RATE</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Ralph B. Kalfayan - Attorney	51.10	400	20,440
Ralph B. Kalfayan - Attorney	5.20	450	2,340
Ralph B. Kalfayan - Attorney	1,446.50	500	723,250
Lynne Brennan - Attorney	1,313.40	500	656,700
Amanda Friedman - Attorney	65.90	300	19,770
Ian Krupar - Law Clerk	370.50	200	74,100
Robbin Griffin - Paralegal	29.00	100	2,900
Cindy Barba - Paralegal	38.00	100	3,800
Total KKBS	<u>3,319.60</u>		<u>1,503,300</u>
Less travel deduction	188.50	250	47,125
Total KKBS historical Lodestar (SD)			<u>1,456,175</u>
Greg James - Attorney	217.40	450	97,830
Greg James - Attorney	81.50	50	4,075
Total Greg James historical Lodestar	<u>298.90</u>		<u>101,905</u>
Grand total historical lodestar	<u>3,618.50</u>		<u>1,558,080</u>
<u>LODESTAR AT PREVAILING LOS ANGELES RATE</u>			
Ralph B. Kalfayan - Attorney	51.10	700	35,770
Ralph B. Kalfayan - Attorney	5.20	700	3,640
Ralph B. Kalfayan - Attorney	1,446.50	700	1,012,550
Lynne Brennan - Attorney	1,313.40	700	919,380
Amanda Friedman - Attorney	65.90	300	19,770
Ian Krupar - Law Clerk	370.50	200	74,100
Robbin Griffin - Paralegal	29.00	100	2,900
Cindy Barba - Paralegal	38.00	100	3,800
Total KKBS	<u>3,319.60</u>		<u>2,071,910</u>
Less travel deduction	188.50	450	84,825
Total KKBS Lodestar at prevailing rate in LA			<u>1,987,085</u>
Greg James - Attorney	217.40	700	152,180
Greg James - Attorney	81.50	50	4,075
Total Greg James Lodestar at prevailing rate in LA	<u>298.90</u>		<u>156,255</u>
Grand total of Lodestar at prevailing rate in LA	<u>3,618.50</u>		<u>2,143,340</u>

# Krause, Kalfayan, Benink & Slavens LLP

550 West C Street, Suite 530

San Diego, California, 92101

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Invoice submitted to:  
Rebecca Willis

January 21, 2016

In Reference To: Rebecca Willis vs. Los Angeles County Water District  
Antelope Valley Groundwater Litigation

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2012	RBK Conference Telephone conference with class member regarding status (.2).	0.20 400.00/hr	80.00
1/18/2012	RBK Litigation Strategy Work Review of motions filed by AGWA regarding phase 4 trial (.4).	0.40 400.00/hr	160.00
1/19/2012	RBK Litigation Strategy Work Review of Central and six Basin decisions (.5).	0.50 400.00/hr	200.00
3/19/2012	RBK Litigation Strategy Work Review of filed pleadings (.2).	0.20 400.00/hr	80.00
4/30/2012	RBK Litigation Strategy Work Meeting with DZ to discuss letters to PWS and all counsel (.3). Review of letters (.5) Review of emails from all counsel (.5).	1.30 400.00/hr	520.00
5/1/2012	RBK Litigation Strategy Work Preparation for hearing (1.0).	1.00 400.00/hr	400.00
5/2/2012	RBK Hearing Appearance at telephonic hearing on CMC (1.0). Meeting with DZ to discuss results of hearing and strategy (.5).	1.50 400.00/hr	600.00

		<u>Hrs/Rate</u>	<u>Amount</u>
5/22/2012	RBK Litigation Strategy Work Telephone conference with Melinda at Justice Robie's chambers regarding mediation (.2).	0.20 400.00/hr	80.00
5/30/2012	RBK Mediation Appearance at mediation and meeting with all counsel present (4.0).	4.00 400.00/hr	1,600.00
	RBK Travel Travel to Sacramento to attend mediation before Justice Robie (2.0). Travel to San Diego (2.0).	4.00 400.00/hr	1,600.00
6/19/2012	RBK Conference Meeting with David Z to discuss today's case management conference and preparation of memo to the file.	0.50 400.00/hr	200.00
6/20/2012	RBK Briefs and Motions and Legal Research Further preparation of mediation brief and spreadsheet of damages (3.4).	3.40 400.00/hr	1,360.00
6/21/2012	RBK Litigation Strategy Work Review of CMC from Lemieux (.2); email from Warren Wellen (.2); finalized our CMC statement (2.2)	2.60 400.00/hr	1,040.00
6/22/2012	RBK Conference Telephonic conference with Avek (1.0)	1.00 400.00/hr	400.00
7/9/2012	RBK Hearing Hearing on CMC.	2.50 400.00/hr	1,000.00
9/19/2012	RBK Litigation Strategy Work Review of Motion for Protective Order by AGWA (.2).	0.20 400.00/hr	80.00
10/5/2012	RBK Litigation Strategy Work Review of filings in advance of status conference for Oct 12 (.5).	0.50 400.00/hr	200.00
10/8/2012	RBK Litigation Strategy Work Review of filings before status conference (1.0)	1.00 400.00/hr	400.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2012	RBK Ct. appearance Preparation for status conference (1.0).	1.00 400.00/hr	400.00
10/12/2012	RBK Hearing Appearance at hearing on CMC and telephone conference with counsel post hearing (1.8). Preparation of memo to the file (.4).	2.20 400.00/hr	880.00
10/16/2012	RBK Litigation Strategy Work Review of emails and court order (.4).	0.40 400.00/hr	160.00
11/5/2012	RBK Litigation Strategy Work Review of TSC statements (1.0)	1.00 400.00/hr	400.00
11/6/2012	RBK Litigation Strategy Work Further review of statements and filings (1.0).	1.00 400.00/hr	400.00
11/8/2012	RBK Litigation Strategy Work Review of filings in preparation for TSC (1.0)	1.00 400.00/hr	400.00
11/9/2012	RBK Hearing Appearance at TSC via phone (2.0)	2.00 400.00/hr	800.00
11/19/2012	RBK Discovery Review of filings and objections to court ordered discovery.	1.00 400.00/hr	400.00
11/21/2012	RBK Litigation Strategy Work Review of filings.	0.40 400.00/hr	160.00
11/28/2012	RBK Litigation Strategy Work Review of letter to Mike M regarding suit against landowners (.2). E-mail co-counsel (.2).	0.40 400.00/hr	160.00
11/29/2012	RBK Litigation Strategy Work Multiple telephone conferences with co-counsel regarding status of case and motion to intervene.	0.50 400.00/hr	200.00
12/4/2012	RBK Litigation Strategy Work Review of status of case (.3). Telephone conference with David Z. regarding strategy (.4).	0.70 400.00/hr	280.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/6/2012	RBK Litigation Strategy Work Review of PWS CMC statement (.2). Conference with counsel regarding same (.3)	0.50 400.00/hr	200.00
12/10/2012	RBK Litigation Strategy Work Exchange of emails with counsel and review of all filings before hearing.	1.20 400.00/hr	480.00
12/11/2012	RBK Hearing Appearance at lengthy telephonic hearing on TSC, CMC, and Discovery program. (3.0)	3.00 400.00/hr	1,200.00
12/12/2012	RBK Litigation Strategy Work Review of CMC and Discovery orders from court and emails to counsel (.5).	0.50 400.00/hr	200.00
12/13/2012	RBK Briefs and Motions and Legal Research Preparation of ex parte application to exclude Willis from Discovery order.	2.50 400.00/hr	1,000.00
12/14/2012	RBK Litigation Strategy Work Appearance on conference call regarding liaison committee (1.); Preparation of memo to file (.4); Review of filings (.3); Telephone conference with Rowena Walker regarding ex parte (.2).	1.90 400.00/hr	760.00
12/17/2012	RBK Litigation Strategy Work Exchange of emails with clerk of court (.2). Review of filings (.2). Email to counsel (.2).	0.60 400.00/hr	240.00
12/18/2012	RBK Briefs and Motions and Legal Research Preparation of statement re phase IV trial (1.0); Review of filings (1.3).	2.30 400.00/hr	920.00
12/19/2012	RBK Litigation Strategy Work Telephone conference with Lemieux's office asking for records of North Edwards and Desert Lake (.2); Review of filings (.8).	1.00 400.00/hr	400.00
12/22/2012	RBK Discovery Review of discovery responses.	1.00 400.00/hr	400.00
10/8/2013	RBK Litigation Strategy Work Review of woods partial settlement agreement with public water suppliers (.5). Review of ex parte application (.2). Review of LA county	1.10 450.00/hr	495.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	request to stay woods v LA county (.2). Review of court order (.2).		
11/8/2013	RBK Correspondence Review of discovery from Bill Brunick (.2). Review of correspondence from Mr. Brunick (.2). Preparation of letter objecting to Mr. Brunick's discovery requests (.4). Email to Greg James (.2).	1.00 450.00/hr	450.00
11/11/2013	RBK Litigation Strategy Work Telephone conference with Greg regarding Brunick filing (.3). Review of Brunick filing (.7).	1.00 450.00/hr	450.00
11/20/2013	RBK Litigation Strategy Work Receipt and review of letter from Bill Brunick regarding return flows (.4). Response thereto (.4). Review of filings in court (.3).	1.10 450.00/hr	495.00
12/18/2013	AF General Read over AVEK's motion for summary adjudication, look for possible issues for landowner clients (1.0).	1.00 300.00/hr	300.00
12/30/2013	RBK Litigation Strategy Work Review of filings (1.0).	1.00 450.00/hr	450.00
1/1/2014	RBK Litigation Strategy Work Review of Woods class reply brief (.2)	0.20 500.00/hr	100.00
1/2/2014	AF Litigation Strategy Work Look up notices of deposition for AVEK's expert, calendar and discussion with RBK about attendance	0.20 300.00/hr	60.00
1/7/2014	RBK Litigation Strategy Work Review of discovery from Bolthouse farms against Willis (.5). Preparation of response to Bolthouse.(.9)	1.40 500.00/hr	700.00
	AF Correspondence Read and review Bolthouse discovery requests, draft letter objecting to all discovery requests (1.0).	1.00 300.00/hr	300.00
1/13/2014	RBK Litigation Strategy Work Review of recent filings and discovery (.5) Review of letter from Zimmer regarding return flows from native yield not imported water	1.40 500.00/hr	700.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	and preparation of response thereto (.9).		
1/14/2014 RBK	Discovery Review of letters from Bolthouse regarding discovery and preparation of response thereto (1.0). Telephone conference with Greg James regarding issues relative to return flow (.4).	1.40 500.00/hr	700.00
1/15/2014 RBK	Litigation Strategy Work Review of order from court and recent filings. (.4)	0.40 500.00/hr	200.00
1/27/2014 AF	Hearing Attend Motion for Summary Adjudication hearing (1.0). Review notes and write synopsis of hearing, email to RBK for review (1.0).	2.00 300.00/hr	600.00
AF	Travel Drive to Los Angeles to attend hearing (3.0). Drive back to San Diego (3.0).	6.00 300.00/hr	1,800.00
1/28/2014 AF	General Receive and review minute order; calendar upcoming important dates and deadlines.	0.20 300.00/hr	60.00
1/30/2014 RBK	Litigation Strategy Work Review of orders from court regarding federal reserve rights and Avek rights to return flows (.4).	0.40 500.00/hr	200.00
2/3/2014 AF	Discovery Receive and review meet and confer letter regarding Bolthouse discovery requests; draft response to Zimmer, finalize and mail to Zimmer.	1.20 300.00/hr	360.00
3/10/2014 RBK	Litigation Strategy Work Telephone conference with class member (.2). Review of letter regarding settlement conference (.2).	0.40 500.00/hr	200.00
4/3/2014 RBK	Litigation Strategy Work Telephone conference with Mike McLachlan regarding possible settlement of case (.5). Memo to the file and review of settlement agreement (.5).	1.00 500.00/hr	500.00



		<u>Hrs/Rate</u>	<u>Amount</u>
4/7/2014	RBK Litigation Strategy Work Receipt and review of order and discussions with AF (.5).	0.50 500.00/hr	250.00
4/8/2014	RBK Litigation Strategy Work Telephone conference with class member regarding status of case (.3). Review of filings and strategy regarding order and meeting with Amanda (1.5).	1.80 500.00/hr	900.00
4/9/2014	RBK Litigation Strategy Work Preparation of status conference statement (1.0). Telephone conference with investigator regarding status of property in Antelope Valley (.2). Review of investigators report (.5). Meeting with counsel to discuss strategy and preparation of memo to the file (2.0).	3.70 500.00/hr	1,850.00
4/10/2014	RBK Litigation Strategy Work Preparation for conference call with all landowners and public water suppliers and attendance at conference call (1.0). Review of notes from settlement and settlement agreement (1.0).	2.00 500.00/hr	1,000.00
4/17/2014	AF Research Analyze Long Valley case for relevance to Antelope Valley issues.	0.70 300.00/hr	210.00
4/21/2014	RBK Litigation Strategy Work Email from possible class member. Response to email.	0.20 500.00/hr	100.00
5/15/2014	RBK Litigation Strategy Work Further preparation of status conference statement (.9).	0.90 500.00/hr	450.00
5/22/2014	RBK Conference Email regarding proposed physical solution.	0.20 500.00/hr	100.00
5/28/2014	RBK Conference Email to Warren Wellen regarding proposed physical solution (.2). Preliminary review of proposed physical solution (.9). Telephone conference with Greg James regarding physical solution (.3).	1.40 500.00/hr	700.00
6/5/2014	RBK Litigation Strategy Work Review of Draft May 22, 2014 proposed physical solution and email to Warren Wellen (2.0).	2.00 500.00/hr	1,000.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2014	AF Research Go over list of potential class members and class representatives with Ian, research potential members; email to RBK regarding class member information.	0.40 300.00/hr	120.00
6/11/2014	AF Research Telephone conference with class member regarding proposed settlement impact on Willis class, email to RBK regarding same; continued research on proposed physical solution and application of case law (3.0).	3.00 300.00/hr	900.00
6/12/2014	AF Research Continued research regarding physical solution, comparison of physical solution with stipulation of settlement (3.0).	3.00 300.00/hr	900.00
6/14/2014	AF Research Continued research regarding physical solution, comparison of physical solution and stipulation of settlement, research regarding subordination of water rights (2.0).	2.00 300.00/hr	600.00
6/17/2014	RBK Litigation Strategy Work Telephone conference with class member regarding proposed physical solution (.3). Receipt of email from class member regarding proposed physical solution and response to email (.3).	0.60 500.00/hr	300.00
	AF Litigation Strategy Work Prepare retainer agreement for potential new class representative.	0.80 300.00/hr	240.00
7/11/2014	RBK Litigation Strategy Work Preparation of letter to public water suppliers regarding terms contained in proposed physical solution (1.0). Review of terms of proposed physical solution (1.0). Review of order from court (.2).	2.20 500.00/hr	1,100.00
7/14/2014	RBK Litigation Strategy Work Preparation of letter to Judge Komar (.5) Telephone conference with government state agency regarding notice to riparian right holders (.4).	0.90 500.00/hr	450.00
7/16/2014	AF Briefs and Motions and Legal Research Telephone conference with RBK regarding letter to court regarding physical solution (.2); make edits to letter (.5); email to RBK for review (.2); continue research and drafting of opposition brief (1.8).	2.70 300.00/hr	810.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2014	AF	Briefs and Motions and Legal Research Telephone conference with RBK regarding potential class representatives, continue research on class representatives, call to general systems regarding case map and download of class representative contact info; email to RBK regarding updated contact information; continue research and drafting of brief in opposition to physical solution (3.7).	3.70 300.00/hr 1,110.00
7/21/2014	RBK	Briefs and Motions and Legal Research Telephone conference with prospective clients regarding case (1.0). Meeting with A Friedman to discuss briefing project and research same (1.2). Telephone conference with class members (2.0).	4.20 500.00/hr 2,100.00
7/24/2014	RBK	Litigation Strategy Work Telephone conference with clients and search for additional clients and investigate same (2.0) Telephone conference with other class members regarding retention (1.0). Edits to retainer agreement (.5).	3.50 500.00/hr 1,750.00
7/25/2014	AF	Briefs and Motions and Legal Research Review latest changes to retainer agreement, re-send retainer; continue working on brief, finalize before sending to Ralph to review; begin drafting motion to substitute (1.4).	1.40 300.00/hr 420.00
7/28/2014	RBK	Litigation Strategy Work Telephone conference with class members regarding status of litigation (.3). Email with Mike Mclachlan regarding physical solution and review of same (.8). Emails with prospective clients to be named class representatives (1.0). Review of exhibits from Mike M (.5).	2.60 500.00/hr 1,300.00
	AF	Research Print out newest physical solution, compare with last version, make note of all the differences and changes from the previous version - look up proper hearing dates for preliminary approval, calendar (3.4).	3.40 300.00/hr 1,020.00
7/29/2014	RBK	Briefs and Motions and Legal Research Review of revised draft of Proposed physical solution and discussion with other counsel (4.0). Telephone conference with class members (.2) Meeting with Amanda to discuss brief (1.0).	5.20 500.00/hr 2,600.00
	AF	Briefs and Motions and Legal Research Download and save exhibits to folder, meeting with RBK discussion of brief in opposition to preliminary approval, download and review filings in appeal, begin drafting facts and procedural history section of brief; call to Professor Sunding at Berkeley out of office, emailed requesting	6.70 300.00/hr 2,010.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	time to speak with Ralph (6.7).		
7/30/2014	RBK Litigation Strategy Work Further review of proposed physical solution (.5). Meeting with counsel to discuss same (1.0). Research and preparation of brief in opposition to proposed physical solution (2.0).	3.50 500.00/hr	1,750.00
	AF Briefs and Motions and Legal Research Sit in on conference call, meeting with RBJ re settlement review by court; research re ability of court to review non-final settlement; review briefs filled in Mojave case.	6.90 300.00/hr	2,070.00
7/31/2014	RBK Conference Conference with Mike McLachlan regarding proposed physical solution (.5). Meeting with counsel to discuss merits of case (1.0). Preparation of status conference statement (1.4).	2.90 500.00/hr	1,450.00
	AF Briefs and Motions and Legal Research Review latest changes to the brief, meeting with RBK to discuss issues, continue research regarding settlement issue.	4.40 300.00/hr	1,320.00
8/1/2014	RBK Litigation Strategy Work Further preparation of CMC statement (.4). Meeting with Amanda to discuss same (.4).	0.80 500.00/hr	400.00
	AF Research Continue research on settlement issue and presentation of settlement to court; begin drafting case management statement.	6.50 300.00/hr	1,950.00
8/3/2014	RBK Litigation Strategy Work Email from James Dubois regarding proposed physical solution (.2). Review of documents and all related exhibits (1.0). Review of filings and prior research on the case (2.0). Preparation of CMC statement to the court (1.5).	4.70 500.00/hr	2,350.00
	LB Litigation Strategy Review and analyze draft Stipulation and Judgment and related exhibits regarding proposed Physical Solution generated by water suppliers, United States, and other entities (3.3).	3.30 500.00/hr	1,650.00
8/4/2014	RBK Litigation Strategy Work Research status of case (2.5). Telephone conference with G James regarding points in CMC statement and email from Feds(.5). Meeting	4.90 500.00/hr	2,450.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	with counsel to discuss status of case (1.5). Email to prospective clients regarding retention (.4).		
8/4/2014 AF	Research Continue research for opposition brief, review draft case management statement, Telephone conference with Ralph regarding case management statement, research regarding non-binding signatories, edits to case management statement (4.0).	4.00 300.00/hr	1,200.00
8/6/2014 AF	Research Continue reviewing Bolthouse and Wood filings; continue drafting opposition brief.	2.50 300.00/hr	750.00
8/7/2014 AF	Research Continue research and drafting of opposition brief; review Wood filings looking for arguments on permanent or temporary allocations.	2.20 300.00/hr	660.00
RBK	Litigation Strategy Work Further preparation for case management conference and review of proposed physical solution (3.5).	3.50 500.00/hr	1,750.00
8/8/2014 RBK	Litigation Strategy Work Preparation for CMC, review of status of case, and research and compare physical solution with Willis settlement (4.0).	4.00 500.00/hr	2,000.00
LB	Litigation Strategy Review and analyze R. Kalfayan's oral argument points; review and analyze Public Water Suppliers' CMC Statement; draft memorandum to R. Kalfayan in response to same.	2.50 500.00/hr	1,250.00
8/10/2014 RBK	Ct. appearance Preparation for hearing and meeting with Greg James (2.0).	2.00 500.00/hr	1,000.00
RBK	Travel Travel to Los Angeles (2.5).	2.50 500.00/hr	1,250.00
8/11/2014 RBK	Ct. appearance Meeting with Greg prior to court appearance (2.2). Appearance in court regarding status conference (3.0). Meeting with all parties and counsel at BBK (2.0).	7.20 500.00/hr	3,600.00

		<u>Hrs/Rate</u>	<u>Amount</u>
8/11/2014	RBK Travel Travel to San Diego (2.5).	2.50 500.00/hr	1,250.00
8/12/2014	LB General Respond to Willis Class member questions regarding status update on case received from the Court; document substance of conversation for review by R. Kalfayan.	0.60 500.00/hr	300.00
8/18/2014	RBK Litigation Strategy Work Email with client regarding strategy (.2). Review of prior and current orders (.4). Telephone conference with public entity lawyer regarding strategy and status of case (.5). Telephone conference with watermaster for other adjudications (.5).	1.60 500.00/hr	800.00
8/19/2014	RBK Litigation Strategy Work Research and compare allocation of NSY (1.5). Research and comparison of proposed physical solution (1.0). Telephone conference with class members (.6). Review of retainer agreement for new client (.5).	3.60 500.00/hr	1,800.00
8/20/2014	RBK Litigation Strategy Work Preparation of email and memo to the file regarding proposal to all landowners (2.0). Telephone conference with landowner and public entity counsel to discuss proposal (.4). Comparison of data for physical solution (1.5).	3.90 500.00/hr	1,950.00
8/21/2014	RBK Litigation Strategy Work Telephone conference with counsel for landowners regarding willis settlement and proposed physical solution (.7). Review of trial briefs and declarations from phase IV (2.0).	2.70 500.00/hr	1,350.00
8/27/2014	RBK Litigation Strategy Work Review of filings from all landowners for reasonable and beneficial use of water (1.5).	1.50 500.00/hr	750.00
8/29/2014	RBK Litigation Strategy Work Conference with MM regarding case (.5). Email and phone conference with Rod Smith (.5).	1.00 500.00/hr	500.00
9/1/2014	RBK Litigation Strategy Work Research cases and preparation of outline for opposition to SPPS settlement (3.5).	3.50 500.00/hr	1,750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
9/3/2014	RBK Litigation Strategy Work Appearance at MSC with all parties (2.0). Telephone conference with class members regarding status of case (.4). Telephone conference with client David Estrada regarding retention and scope of work (.4).	2.80 500.00/hr	1,400.00
9/4/2014	RBK Litigation Strategy Work Exchange of email with client and review of attachment (.3). Telephone conference with class member regarding case (.5). Rebecca Willis research (.3). Telephone conference with multiple landowner counsel (1.5). Preparation of memo regarding arguments to present to court (1.5).	4.10 500.00/hr	2,050.00
9/5/2014	RBK Litigation Strategy Work Emails with experts regarding case (.4). Review and further preparation of brief regarding proposed physical solution (2.0). Research cases (1.0).	3.40 500.00/hr	1,700.00
9/8/2014	LB Litigation Strategy Review and analyze Long Valley case in light of proposed Physical Solution that extinguishes Willis Class members' Overlying Rights; discuss same with R. Kalfayan.	1.80 500.00/hr	900.00
9/9/2014	LB General Review and analyze Wright vs. Goleta Water District and related cases in light of proposed Physical Solution that extinguishes Willis Class members' Overlying Rights.	2.50 500.00/hr	1,250.00
	RBK Ct. appearance Appearance at MSC with all counsel (2.0). Meeting with water economist Rod Smith to discuss issues relative to the case (2.0). Review of case law in preparation for MSC (2.0).	6.00 500.00/hr	3,000.00
	RBK Travel Travel to Pomona (2.0).	2.00 500.00/hr	1,000.00
9/11/2014	RBK Litigation Strategy Work Meeting with counsel to discuss case (1.0). Review of Texas Supreme Court case (1.0). Memo to file regarding strategy (.5).	2.50 500.00/hr	1,250.00
9/12/2014	RBK Litigation Strategy Work Multiple telephone conference with experts (1.0). Telephone conference with Public Water Suppliers regarding status of case (.4).	1.80 500.00/hr	900.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	Review of file (.4).		
9/15/2014	RBK Litigation Strategy Work Telephone conference with Stephen Childs regarding Rebecca Willis (.4). Multiple emails with R. Willis regarding case and declarations and status (.5). Further preparation of Motion to Substitute (2.0).	2.90 500.00/hr	1,450.00
	LB Research Legal research regarding motion to substitute class representative when original class representative no longer has standing to sue; draft memorandum to R. Kalfayan citing useful cases.	1.40 500.00/hr	700.00
9/16/2014	LB Pleading Draft declaration of David Estrada in support of motion to substitute; review and edit draft motion to substitute.	0.80 500.00/hr	400.00
9/17/2014	RBK Litigation Strategy Work Telephone conference with class members (1.5). Further preparation of brief regarding substitution (1.5).	3.00 500.00/hr	1,500.00
	LB Pleading Discuss draft declaration of Estrada in support of motion to substitute with David Estrada; finalize same.	0.60 500.00/hr	300.00
9/18/2014	RBK Litigation Strategy Work Preparation of CMC statement (1.0). Research new case authority (1.0). Further preparation of motion to substitute (1.8).	3.80 500.00/hr	1,900.00
	LB Pleading Review and edit Case Management Conference statement; provide edits and comments to R. Kalfayan.	0.40 500.00/hr	200.00
9/19/2014	RBK Litigation Strategy Work Final preparation of CMC statement and email to clients (1.2).	1.20 500.00/hr	600.00
9/22/2014	LB Pleading Revise declaration of Archdiocese of Los Angeles in support of motion to substitute.	0.30 500.00/hr	150.00



		<u>Hrs/Rate</u>	<u>Amount</u>
9/25/2014	RBK Litigation Strategy Work Review of filings (.5). Preparation for status conference (1.0).	1.50 500.00/hr	750.00
9/26/2014	RBK Ct. appearance Preparation for case status conference (1.0). Appearance at CMC (1.5). Post CMC emails with counsel (1.0).	3.50 500.00/hr	1,750.00
9/30/2014	LB Correspondence Drafted letter to Public Suppliers regarding Willis Class position regarding proposed physical solution.	0.80 500.00/hr	400.00
10/1/2014	RBK Litigation Strategy Work Telephone conference with class member regarding strategy and declarations (.3).	0.30 500.00/hr	150.00
10/7/2014	LB General Attend telephonic CMC; email to RBK summarizing the CMC; review email from Eric Garner regarding CMC and email to RBK regarding same; review and provide comments on follow-up CMC statement drafted by RBK.	0.80 500.00/hr	400.00
10/8/2014	LB General Review and edit motion to substitute or add class representatives and CMC briefs.	0.30 500.00/hr	150.00
10/10/2014	RBK Ct. appearance Appearance at status conference via courtcall and preparation for conference (2.0). Final review of motion to add or substitute before filing (2.0).	4.00 500.00/hr	2,000.00
10/13/2014	RBK Litigation Strategy Work Review of letter regarding today's deposition and discussion with Lynne regarding same (.3).	0.30 500.00/hr	150.00
10/14/2014	RBK Litigation Strategy Work Telephone conference with counsel for public entities regarding status of Willis action (.4).	0.40 500.00/hr	200.00
10/15/2014	RBK Litigation Strategy Work Email exchange with counsel for public entities (.4). Preparation of letter to landowners regarding terms of settlement (1.0). Discussion	1.90 500.00/hr	950.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	with counsel regarding letter (.5).		
10/15/2014 LB	General Review and edit draft letter to landowners for RBK (.2).	0.20 500.00/hr	100.00
10/20/2014 RBK	Litigation Strategy Work Review of US proposed order and research same (2.0).	2.00 500.00/hr	1,000.00
10/21/2014 RBK	Litigation Strategy Work Review of proposed order from the US (.4). Email to Lee Leininger (.1). Research response to proposed order (2.0). Preparation of response to proposed order (1.6).	4.10 500.00/hr	2,050.00
LB	Litigation Strategy Discuss litigation strategy with RBK regarding inclusion of Willis Class' rights in proposed physical solution (.5).	0.50 500.00/hr	250.00
10/22/2014 RBK	Litigation Strategy Work Telephone conference with opposing counsel Wendy Wang regarding motion to substitute (.4). Research same (1.0). Preparation of email to client and conversations with client (1.0). Further preparation of response to Proposed Order (2.0). Multiple telephone conversations with clients (1.0).	5.40 500.00/hr	2,700.00
10/28/2014 RBK	Litigation Strategy Work Conference call with AVEK (1.0). Preparation of reply brief to WW40 opposition to Motion to Add or Substitute (3.0). Meeting with Ian to discuss research (1.0). Research issues in Motion to Add (2.0).	7.00 500.00/hr	3,500.00
LB	General Edit reply brief regarding opposition to motion to substitute plaintiff; edit letter to pumping landowners regarding proposed compromise for physical solution (.3).	0.30 500.00/hr	150.00
10/29/2014 RBK	Litigation Strategy Work Finalize and file reply brief (2.0).	2.00 500.00/hr	1,000.00
10/30/2014 RBK	Litigation Strategy Work Multiple emails to and from counsel (.5). Review and further preparation of partial opposition to CMO (3.5).	4.00 500.00/hr	2,000.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2014	RBK Litigation Strategy Work Preparation for hearing on Motion to Substitute and hearing on CMO (2.5).	2.50 500.00/hr	1,250.00
11/2/2014	RBK Litigation Strategy Work Further research cases in support of motions to substitute and motion to CMO. (2.3).	2.30 500.00/hr	1,150.00
11/3/2014	RBK Litigation Strategy Work Multiple emails with Greg James regarding hearings (.5). Further preparation for same (2.0).	2.50 500.00/hr	1,250.00
11/4/2014	RBK Ct. appearance Appearance in court regarding hearings on motion to substitute and motion regarding CMO (2.0). Meeting with Greg pre and post hearing (3.0).	5.00 500.00/hr	2,500.00
	RBK Travel Travel time to and from Los Angeles (5.0).	5.00 500.00/hr	2,500.00
11/5/2014	RBK Litigation Strategy Work Email to Jeff Dunn requesting evidence relative to the Archdiocese (.4). Review of AVEK D40 MOU for sale and delivery of water (.8). Preparation of memo to file regarding strategy for challenging PWS (1.0). Email Chris Sanders (.2).	2.40 500.00/hr	1,200.00
11/6/2014	RBK Litigation Strategy Work Telephone conference with landowner counsel regarding potential physical solution (.4). Email exchange with Greg James (.3). Telephone conference with clients (1.0). Telephone conference with public entities (1.8). Research website for class members (.5).	4.00 500.00/hr	2,000.00
11/7/2014	RBK Litigation Strategy Work Exchange of email with Jeff Dunn regarding Archdiocese (.2).	0.20 500.00/hr	100.00
11/10/2014	RBK Litigation Strategy Work Review of Santa Maria case and contact with class members (2.0).	2.00 500.00/hr	1,000.00
11/12/2014	RBK Litigation Strategy Work Review of transcript from 11/4/2014 (.4). Revise letter to landowner counsel. (.5). Research and document strategy for submission of proposed physical solution (2.0). Review of orders posted by Court	3.30 500.00/hr	1,650.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	(.4).		
11/13/2014	RBK Litigation Strategy Work Meeting with Lynne to discuss revised motion to add Archdiocese and discuss hearing on 11/4/14 (1.0).	1.00 500.00/hr	500.00
11/14/2014	RBK Litigation Strategy Work Review of client list for additional plaintiffs (1.0). Preparation of list of inconsistencies between PPS and Judgment (3.0).	4.00 500.00/hr	2,000.00
11/17/2014	RBK Litigation Strategy Work Research case law and new law regarding groundwater and create APPS (8.0).	8.00 500.00/hr	4,000.00
11/18/2014	RBK Litigation Strategy Work Initial preparation of opposition to proposed physical solution and create APPS (8.0).	8.00 500.00/hr	4,000.00
11/19/2014	RBK Litigation Strategy Work Further work on renewed motion to add Archdiocese (2.0). Further work on opposition to PPS (4.0). Further work on motion for enforcement of judgment (2.0).	8.00 500.00/hr	4,000.00
	LB General Draft Declaration of Archdiocese in support of Renewed Motion to Add Archdiocese as Class Representative	1.50 500.00/hr	750.00
11/20/2014	LB Research Discuss proposed settlement letter with outside counsel for Archdiocese (.2); draft email to R. Kalfayan regarding discussions (.1); edit proposed settlement letter (.5); draft email regarding proposed settlement letter (.2); draft Renewed Motion to Add Archdiocese as Class Representative (1.0); draft email regarding draft Renewed Motion to Add Archdiocese as Class Representative (.1)	2.10 500.00/hr	1,050.00
11/21/2014	RBK Litigation Strategy Work Review of file and strategy regarding case and consider APPS and research case law (3.0).	3.00 500.00/hr	1,500.00
	LB Research Finalize letter to counsel for all PWS regarding proposed settlement offer by the Willis Class (1.0); draft email to Archdiocese regarding Declaration of Archdiocese in support of Motion to Add Archdiocese	1.10 500.00/hr	550.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	as Class Representative (.1)		
11/24/2014	RBK Litigation Strategy Work Meeting with Lynne to discuss strategy (1.0). Further research and review cases regarding enforcement of judgment (7.0).	8.00 500.00/hr	4,000.00
	LB Research Research case law regarding adequacy of representation given circumstances of case.	2.00 500.00/hr	1,000.00
11/25/2014	RBK Litigation Strategy Work Preparation of opposition to PPS (8.0).	8.00 500.00/hr	4,000.00
	LB Pleading Finalize and file Willis Class' Notice and Renewed Motion to Add Archdiocese as Class Representative and Declaration of Archdiocese relating to "Leslie Property" and Opt-In form	0.50 500.00/hr	250.00
11/26/2014	RBK Litigation Strategy Work Further preparation of opposition to PPS (5.0).	5.00 500.00/hr	2,500.00
	LB Research Edit letter to PWS requesting a copy of proposed physical solution.	0.10 500.00/hr	50.00
12/1/2014	RBK Litigation Strategy Work Further preparation of opposition to PPS (5.0).	5.00 500.00/hr	2,500.00
12/2/2014	RBK Litigation Strategy Work Review of Waldo Accord and create optional physical solutions (5.0).	5.00 500.00/hr	2,500.00
12/3/2014	RBK Litigation Strategy Work Research and review senate hearing by Justice Robie and Eric Garner (2.0). Further preparation of opposition to PPS (3.0).	5.00 500.00/hr	2,500.00
	IK Litigation Strategy Work Reviewing docket entries and preparing collection of documents for RBK.	5.30 200.00/hr	1,060.00
	LB Correspondence Review, edit and finalize letter to counsel for Public Water Suppliers regarding the Public Water Suppliers' breach of the Willis Stipulation	0.30 500.00/hr	150.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	of Settlement arising from the stipulated proposed physical solution.		
12/4/2014	RBK Litigation Strategy Work Research case law regarding physical solutions and preparation of memo to file (2.0).	2.00 500.00/hr	1,000.00
	IK Litigation Strategy Work Review of documents in potential preparation of responding to physical solution.	4.30 200.00/hr	860.00
12/5/2014	RBK Litigation Strategy Work Meeting with counsel to discuss strategy and further preparation of opposition to PPS (4.0).	4.00 500.00/hr	2,000.00
	LB General Review and analyze California Senate Hearing video regarding groundwater adjudications, including Antelope Valley adjudication (1.8). Review and analyze R. Kalfayan's draft motion to withdraw (.2); discuss draft motion with R. Kalfayan (.1).	2.10 500.00/hr	1,050.00
12/8/2014	RBK Litigation Strategy Work Further research and preparation of opposition to PPS (8.0).	8.00 500.00/hr	4,000.00
	IK Litigation Strategy Work Docket search and Case Review.	5.30 200.00/hr	1,060.00
12/9/2014	RBK Litigation Strategy Work Review of Blumfield MSJ (2.0). Review of other filings (1.0). Review of opposition to Archdiocese as lead (1.0). Further preparation of opposition to PPS (4.0).	8.00 500.00/hr	4,000.00
	IK Litigation Strategy Work Docket search and collection of documents for RBK.	5.70 200.00/hr	1,140.00
12/10/2014	IK Litigation Strategy Work Docket Search for filed orders and stipulations.	1.50 200.00/hr	300.00
	LB Pleading Review and analyze District 40's Opposition brief to renewed motion to add Archdiocese of Los Angeles as class representative, including Wang Declaration and exhibits in support. Review and analyze cases cited in District 40's Opposition brief to renewed motion to add	2.90 500.00/hr	1,450.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	Archdiocese of Los Angeles as class representative.		
12/11/2014 LB	Pleading Draft introduction to reply brief regarding renewed motion to add Archdiocese of Los Angeles as class representative (1.3); draft Declaration of Archdiocese of Los Angeles in support of renewed motion (.7); discuss draft Declaration of Archdiocese with R. Kalfayan (.1).	2.10 500.00/hr	1,050.00
12/12/2014 RBK	Briefs and Motions and Legal Research Review of opposition brief regarding Archdiocese as lead (1.0). Research cases (1.0). Further preparation of reply brief (2.0).	4.00 500.00/hr	2,000.00
LB	Pleading Draft reply brief regarding renewed motion to add Archdiocese of Los Angeles as class representative (2.3); discuss draft reply brief with R. Kalfayan (.2); draft Request for Dismissal of Answer of Leslie Property (.2); discuss draft Request for Dismissal with R. Kalfayan (.1); discuss edits to Declaration of Archdiocese of Los Angeles in support of renewed motion with Allan Graf, outside counsel for the Archdiocese (.1); review email from Allan Graf regarding Declaration of Archdiocese (.1).	3.00 500.00/hr	1,500.00
LB	Litigation Strategy Review tax bill of Archdiocese of Los Angeles which includes water assessment fee (.1); draft memorandum regarding Archdiocese' tax bill to R. Kalfayan (.1).	0.20 500.00/hr	100.00
12/15/2014 RBK	Litigation Strategy Work Further preparation of opposition brief (8.0).	8.00 500.00/hr	4,000.00
LB	Pleading Revise and finalize reply brief regarding renewed motion to add Archdiocese of Los Angeles as class representative (2.8); discuss reply brief revisions with R. Kalfayan (.3); draft and finalize Reply Declaration of Lynne M. Brennan in support of renewed motion to add Archdiocese of Los Angeles as class representative, including finalizing exhibits in support of motion (1.4); file all reply pleadings in support of renewed motion to add Archdiocese of Los Angeles as class representative with the Court (.2).	4.70 500.00/hr	2,350.00
LB	Correspondence Review and analyze email from Jeff Dunn, District 40 counsel, to Allan Graf, outside counsel for the Archdiocese of Los Angeles (.1); draft memorandum to R. Kalfayan regarding Mr. Dunn's email to Mr. Graf	0.20 500.00/hr	100.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	(.1).		
12/16/2014	LB Correspondence Draft and finalize email in response to Mr. Dunn's ex parte email to Allan Graf, outside counsel for the Archdiocese of Los Angeles (.4); discuss draft email to Mr. Dunn with R. Kalfayan (.2).	0.60 500.00/hr	300.00
	LB Pleading Review and analyze Tapia's Demand for Inclusion in Settlement Negotiations.	0.20 500.00/hr	100.00
12/17/2014	RBK Litigation Strategy Work Further research filings in preparation for opposition to PPS (4.5).	4.50 500.00/hr	2,250.00
	LB Research Research case law regarding finality of judgments.	0.30 500.00/hr	150.00
12/18/2014	LB Pleading Research prior Orders regarding attorneys' fees (.2); draft Motion for Order Permitting Class Counsel to Seek Attorneys' Fees for specified work (4.3)	4.50 500.00/hr	2,250.00
12/19/2014	RBK Litigation Strategy Work Review of Tapia filing and review of court orders (1.0). Research and preparation of demand for participation (.5).	1.50 500.00/hr	750.00
	LB Pleading Review and analyze Tapia's Demand for Inclusion in Settlement Negotiations (.2); write memo regarding pros and cons of submitting a demand for inclusion in settlement negotiations on behalf of the Willis Class (.2); review R. Kalfayan's draft Willis Class Demand for Inclusion in Settlement Negotiations (.1).	0.50 500.00/hr	250.00
	IK Litigation Strategy Work Case docket review for future summary.	5.00 200.00/hr	1,000.00
12/22/2014	LB Expert Work Meet with expert witness Dr. Rod Smith regarding proposals for a physical solution that incorporate the rights obtained by the Willis Class members in the Judgment.	1.20 500.00/hr	600.00



		<u>Hrs/Rate</u>	<u>Amount</u>
12/22/2014	LB Pleading Draft, edit, and finalize Willis Class Demand for Inclusion in Settlement Negotiations (1.4); discuss drafts of Demand for Inclusion in Settlement Negotiations with R. Kalfayan (.3); send draft of Demand for Inclusion of Settlement Negotiations to outside counsel Allan Graf for client Archdiocese of Los Angeles and review Mr. Graf's email in response to same (.1); review email sent by attorney McLachlin regarding Willis Class Demand (.1); draft email to R. Kalfayan regarding McLachlin's email (.2).	2.10 500.00/hr	1,050.00
	IK Litigation Strategy Work Meeting with Water Expert, Filing, and Case Research.	5.30 200.00/hr	1,060.00
	RBK Litigation Strategy Work Preparation of Demand for Inclusion in settlement discussions (2.5). Research Stipulation and grounds to oppose settlement (4.0).	6.50 500.00/hr	3,250.00
12/23/2014	RBK Litigation Strategy Work Receipt and review of 2nd draft proposed PS (1.0). Discussion with counsel (1.0). Research methods to defeat PPS (5.0).	7.00 500.00/hr	3,500.00
	LB General Review and analyze proposed survey by water expert Rod Smith of Willis Class members regarding future plans for property development; draft memorandum to R. Kalfayan with proposed revisions regarding same (.5). Review and analyze Stipulated Proposed Physical Solution and determine its impact on Willis Class Members (3.1).	3.60 500.00/hr	1,800.00
12/24/2014	RBK Litigation Strategy Work Further review of draft PPS and strategy regarding alternatives (3.0).	3.00 500.00/hr	1,500.00
	LB General Draft memorandum to R. Kalfayan regarding Stipulated Proposed Physical Solution (SPPS), including analysis regarding provisions of SPPS that are inconsistent with the Willis Stipulation of Settlement and Judgment	3.30 500.00/hr	1,650.00
12/29/2014	RBK Litigation Strategy Review of reports from Rod regarding case (1.0). Further preparation of Motion for attorneys fees per judgment (2.0).	3.00 500.00/hr	1,500.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2014	LB Pleading Draft motion for attorneys' fees pursuant to Section VIII.D.(a) of the Stipulation of Settlement based on Public Water Suppliers' breach of the Stipulation (3.5). Review and analyze R. Kalfayan's comments to the Stipulated Proposed Physical Solution (.4); draft email to R. Kalfayan regarding same (.1).	4.00 500.00/hr	2,000.00
12/30/2014	LB Research Research and analyze case law and expert practitioner articles regarding potential motion to withdraw based on anticipated refusal of Public Water Suppliers to pay Class Counsel's attorneys' fees in connection with physical solution proceeding	2.30 500.00/hr	1,150.00
12/31/2014	RBK Litigation Strategy Work Review of CMC statements and other filings (1.0). Research and preparation of response to CMC statement (5.0).	6.00 500.00/hr	3,000.00
	LB Litigation Strategy Draft memorandum to R. Kalfayan regarding strategy and basis for motion for attorneys' fees (.7); discuss same with R. Kalfayan (.2)	0.90 500.00/hr	450.00
1/2/2015	RBK Litigation Strategy Work Meeting with Lynne to discuss motion for fees (.5). Further preparation of CMC statement (1.). Review documents with Rod (1.5). Emails to co-counsel regarding strategy (.5).	3.50 500.00/hr	1,750.00
	LB Pleading Revise draft of Case Management Conference Statement (.8); discuss same with R. Kalfayan (.1); draft motion for supplemental attorneys' fees based on C.C.P. Section 1021.5 (2.2); discuss same with R. Kalfayan (.2).	3.30 500.00/hr	1,650.00
1/3/2015	RBK Litigation Strategy Work Further review of status conference statements and review of prior work and preparation of CMC statement in advance of Jan 7 status hearing.	8.00 500.00/hr	4,000.00
1/4/2015	RBK Litigation Strategy Work Further preparation of CMC statement and declaration of RBK (4.0).	4.00 500.00/hr	2,000.00
1/5/2015	RBK Litigation Strategy Work Review of Wood CMC (.2) . Preparation for argument (2.0). Review of file and meeting with Lynne to discuss motion for experts and motion for fees (2.0). Meeting with counsel to discuss case (1.0). Further work	8.20 500.00/hr	4,100.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	on opposition to PS (3.0).		
1/5/2015	IK Litigation Strategy Work Helped to edit and draft and ultimately file moving papers.	5.50 200.00/hr	1,100.00
	LB General Teleconference with Mr. Allan Graf, outside counsel for Archdiocese of Los Angeles, regarding Stipulating Parties' proposed physical solution (.2). Edit CMC statement; draft declaration in support of CMC Statement (1.0). Analyze case law regarding Motion to Obtain Court Order for Permission to Seek Additional Attorney's Fees (2.5).	3.70 500.00/hr	1,850.00
1/6/2015	RBK Litigation Strategy Work Preparation for hearing tomorrow (1.0). Further edits and preparation of motions for fees, for experts, and clarify CMO (4.0). Review of expert report (1.0).	6.00 500.00/hr	3,000.00
	LB Pleading Review and analyze Wood Class CMC (.5); draft Motion to Obtain Court Order for Permission to Seek Additional Attorneys' Fees (4.0). Analyze case law regarding Motion to Obtain Court Order for Permission to Seek Additional Attorneys' Fees (3.0).	7.50 500.00/hr	3,750.00
1/7/2015	RBK Hearing Preparation for hearing (1.0). Appearance at hearing (.8). Post hearing meeting with counsel to discuss strategy (1.5). Preparation of memo to file (.2). Email from Mike M and email from Mike M (.4). Review of client list (1.0). Review of Bolthouse admissions (1.0). Final preparation of separate statement of inconsistencies (2.0).	8.10 500.00/hr	4,050.00
	LB Correspondence Review emails from M . McLachlan regarding Wood Class' request to take deposition of Class Representative David Estrada; draft emails in response to same (1.0).	1.00 500.00/hr	500.00
	LB Hearing Prepare for CMC telephonic hearing, including review R. Kalfayan's oral argument outline; attend CMC telephonic hearing; draft memorandum regarding substance of hearing and send same to Class Representative David Estrada and client Archdiocese of Los Angeles (3.0).	3.00 500.00/hr	1,500.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/7/2015	LB Pleading Draft and edit Motion for Court-Appointed Expert (3.6).	3.60 500.00/hr	1,800.00
1/8/2015	RBK Litigation Strategy Work Telephone conference with client David Estrada (.4). Review of Opposition to Archdiocese from Mike M and discussion with counsel regarding same (1.0). Further preparation of expert motion and fee motion (2.0).	3.40 500.00/hr	1,700.00
	LB Pleading Review and analyze Opposition to Adding Archdiocese as Class Representative Filed by Wood Class and cases cited therein (1.5); draft Motion to Obtain Court Order for Permission to Seek Additional Attorneys' Fees (6.4).	7.90 500.00/hr	3,950.00
1/9/2015	LB Pleading Review Court's Minute Order from January 7 CMC teleconference.	0.10 500.00/hr	50.00
	LB Research Research case law regarding class counsel's professional responsibility when fees not paid (2.2); draft memorandum to R. Kalfayan regarding same (.3); research case law and treatises regarding typicality requirement for class representatives (2.0).	4.50 500.00/hr	2,250.00
1/12/2015	RBK Litigation Strategy Work Further preparation of CMC statement (1.0). Meeting with co-counsel to discuss strategy regarding opposing SPPS (1.0). Review of expert report for alternative consistent solutions (1.4).	3.40 500.00/hr	1,700.00
	LB Pleading Edit CMC Statement (.5).	0.50 500.00/hr	250.00
	LB Expert Work Review and analyze work performed by experts (3.0).	3.00 500.00/hr	1,500.00
	LB Research Research and analyze cases and prior filings/pleadings in support of Further Reply Brief in Response to Opposition to Adding Archdiocese as Class Representative Filed by Wood Class (4.2).	4.20 500.00/hr	2,100.00
1/13/2015	IK Litigation Strategy Work Continued to review landowner list, sorting by emails and acres for possible survey and/or to provide evidence of types and sizes of	5.50 200.00/hr	1,100.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	ownership.		
1/13/2015	RBK Litigation Strategy Work Research case law related to subordination and extinguishment and searched for communication with potential experts and investigated other opposing experts (8.0).	8.00 500.00/hr	4,000.00
	LB Research Research and analyze cases and prior filings/pleadings in support of Further Reply Brief in Response to Opposition to Adding Archdiocese as Class Representative Filed by Wood Class.	5.50 500.00/hr	2,750.00
1/14/2015	RBK Litigation Strategy Work Further preparation of reply to MM opposition to Archdiocese (4.0).	4.00 500.00/hr	2,000.00
	IK Litigation Strategy Work Reviewed Bolthouse Filings admissions regarding usufructory rights and overlying landowners.	5.10 200.00/hr	1,020.00
	LB Pleading Review and edit CMC Statement (.3); Draft Further Reply Brief in Response to Opposition to Adding Archdiocese as Class Representative Filed by Wood Class (5.0).	5.30 500.00/hr	2,650.00
	LB Research Research and analyze cases in support of Further Reply Brief in Response to Opposition to Adding Archdiocese as Class Representative Filed by Wood Class.	2.50 500.00/hr	1,250.00
1/15/2015	RBK Litigation Strategy Work Further research and opposition to MM opposition to Archdiocese (3.0). Further preparation of CMC statement (1.5). Meeting and emails with Lynne regarding same (1.0).	5.50 500.00/hr	2,750.00
	IK Litigation Strategy Work Continued Bolthouse filing review and filed several papers for Willis Class.	3.90 200.00/hr	780.00
	LB Pleading Draft, finalize, and file Further Reply Brief in Response to Opposition to Adding Archdiocese as Class Representative Filed by Wood Class	7.50 500.00/hr	3,750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	(7.0); finalize and file CMC Statement (.5).		
1/16/2015 RBK	Litigation Strategy Work Review of ex parte application and related order and related filings (1.0). Meeting with Lynne and Brian to discuss strategy (2.0). Preparation of memo to file regarding strategy and alternative solutions (2.0).	5.00 500.00/hr	2,500.00
LB	Pleading Review and analyze Amended CMO and review SPPS (2.0); draft proposed order regarding Modified CMO (.5).	2.50 500.00/hr	1,250.00
1/19/2015 RBK	Litigation Strategy Work Research opposition to CMO issues and opposition to Ex parte application for entry of judgment and opposition to public water suppliers physical solution (7.0). Review of court filings (1.0).	8.00 500.00/hr	4,000.00
LB	Pleading Review past filings relating to previous proposed Wood Class Settlement; Draft Ex Parte Application for Modified CMO.	9.50 500.00/hr	4,750.00
1/20/2015 RBK	Litigation Strategy Work Review of Wood Class Ex parte regarding discovery and preparation of response (2.0). Final preparation of response and opposition to CMO proposed by Public Water Suppliers (4.0). Meeting with counsel to discuss strategy (2.0).	8.00 500.00/hr	4,000.00
IK	Litigation Strategy Work Preparation and Filing of the Ex parte motion, proposed order, and objection.	6.90 200.00/hr	1,380.00
LB	Pleading Finalize and file objections to Amended CMO proposed by Stipulating Parties (1.5.); Draft, finalize, and file Ex Parte Application for Modified CMO, Brennan Declaration in support of same, and proposed Order (8.5); Review and analyze Wood Class Request for Informal Discovery Hearing (.5).	10.50 500.00/hr	5,250.00
1/21/2015 RBK	Litigation Strategy Work Preparation of opposition to Wood class meet and confer on deposition of David Estrada (1.5). Review of opposition to Willis ex parte for CMO and discussion with counsel regarding same (2.0). Strategy session with counsel to discuss oral argument and	6.50 500.00/hr	3,250.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	preparation of outline of oral arguments (3.0).		
1/21/2015	IK Litigation Strategy Trial Preparation with LB and RBK.	7.60 200.00/hr	1,520.00
	LB Travel Travel to San Jose from San Diego after Hearing with Judge Komar regarding Amended CMO and Motion to Add Archdiocese as Class Representative.	1.50 500.00/hr	750.00
	LB Hearing Prepare for Hearing with Judge Komar regarding Amended CMO and Motion to Add Archdiocese as Class Representative.	6.50 500.00/hr	3,250.00
	LB Research Review and analyze case law regarding meet and confer obligations for discovery disputes.	1.00 500.00/hr	500.00
	LB Pleading Draft, finalize, and file Opposition to Wood Class Request for Informal Discovery Hearing.	3.20 500.00/hr	1,600.00
	RBK Travel Travel to San Jose for hearing (2.0).	2.00 500.00/hr	1,000.00
1/22/2015	RBK Ct. appearance Preparation for hearing on so called global settlement and physical solution and CMO proposed by settling parties (2.0). Meeting with Lynne before hearing to prepare for oral argument. (2.0). Appearance at hearing on CMO, Expartes, and informal discovery conference (2.0).	6.00 500.00/hr	3,000.00
	LB Travel Return travel from San Jose to San Diego after Hearing with Judge Komar regarding Amended CMO and Motion to Add Archdiocese as Class Representative.	1.50 500.00/hr	750.00
	LB Hearing Prepare for Hearing with Judge Komar regarding Amended CMO and Motion to Add Archdiocese as Class Representative (2.0); Attend Hearing with Judge Komar regarding Amended CMO and Motion to Add Archdiocese as Class Representative (1.5).	3.50 500.00/hr	1,750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/22/2015	RBK Travel Travel from San Jose to San Diego (2.0).	2.00 500.00/hr	1,000.00
1/23/2015	IK Litigation Strategy Work Review of Transcripts and Orders of Hon. Judge Komar - looking for instances where 3rd parties are not bound by agreements between other parties	2.90 200.00/hr	580.00
	LB Hearing Review Court's Minute Order from January 22, 2015 Hearing	0.10 500.00/hr	50.00
	LB Litigation Strategy Discuss litigation strategy with R. Kalfayan in light of January 22 Hearing	0.30 500.00/hr	150.00
1/26/2015	RBK Litigation Strategy Work Further research and preparation of opposition to Wood class motion and SPPS (8.)	8.00 500.00/hr	4,000.00
	IK Litigation Strategy Work Review of Opinions and Transcripts	5.90 200.00/hr	1,180.00
1/27/2015	LB Correspondence Draft letter to all Stipulating Parties regarding demand for removal of references to Willis Class from Wood Class Settlement (1.5); draft letter to Public Water Suppliers regarding further notice of breach of Willis Stipulation of Settlement and violation of Judgment	3.00 500.00/hr	1,500.00
	LB General Review and analyze pleadings filed by all parties for admissions useful to Willis Class in upcoming physical solution proceedings	3.80 500.00/hr	1,900.00
	IK Litigation Strategy Work Review of Transcripts looking for admissions	5.30 200.00/hr	1,060.00
1/28/2015	RBK Litigation Strategy Work Meeting to discuss reasonable and beneficial uses requirements and research Brian Gray articles (2.0). Email to counsel regarding CMO schedule and preparation of memo of outline of all work necessary to	4.00 500.00/hr	2,000.00



		<u>Hrs/Rate</u>	<u>Amount</u>
	complete (2.0).		
1/28/2015	LB Research Review and analyze article regarding reasonable use doctrine (1.0); analyze cases cited therein (2.5)	3.50 500.00/hr	1,750.00
	LB General Review and analyze pleadings filed by all parties for admissions useful to Willis Class in upcoming physical solution proceedings	3.50 500.00/hr	1,750.00
	IK Litigation Strategy Work Review Transcripts and Opinions looking for admissions	3.30 200.00/hr	660.00
1/29/2015	RBK Litigation Strategy Work Further research and strategy regarding opposition brief to Wood settlement and SPPS and further drafting of same (8.0).	8.00 500.00/hr	4,000.00
	LB General Review and analyze pleadings filed by all parties regarding Court-appointed expert for Wood Class; draft memorandum regarding mechanism for appointment of expert by Court	5.20 500.00/hr	2,600.00
	IK Litigation Strategy Work Further Review of Transcripts	4.20 200.00/hr	840.00
1/30/2015	LB General Review and analyze pleadings filed by all parties for admissions useful to Willis Class in upcoming physical solution proceedings	7.00 500.00/hr	3,500.00
	LB Litigation Strategy Review and analyze litigation strategy memo drafted by R. Kalfayan; draft memo to R. Kalfayan in response to same	0.20 500.00/hr	100.00
	IK Litigation Strategy Work Review Antelope Valley Physical Solution begin draft of Willis Class Version	3.30 200.00/hr	660.00
2/2/2015	RBK Litigation Strategy Work Further research and preparation of opposition to SPPS, APPS, and Motions for fees and experts (7.2).	7.20 500.00/hr	3,600.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2015	LB Research Analyze cases regarding motions to decertify class.	3.50 500.00/hr	1,750.00
2/3/2015	IK Litigation Strategy Work Discussion of Antelope Valley 3 Option Plan and begin Drafting plan	6.00 200.00/hr	1,200.00
	LB Research Review and analyze outline of arguments for opposition to SPPS (2.3); analyze provisions of SPPS (2); discuss same with R. Kalfayan (.2); Draft introduction to Motion for Court-appointed expert (1.0); discuss same with R. Kalfayan (.1)	5.60 500.00/hr	2,800.00
2/4/2015	RBK Litigation Strategy Work Further preparation of opposition briefs to SPPS and preparation of motions for experts and fees and clarify CMO.	7.00 500.00/hr	3,500.00
	IK Litigation Strategy Work Continue Drafting 3 Option Plan	5.70 200.00/hr	1,140.00
	LB Research Review and analyze pleadings, including cases cited therein, related to Wood Class' motions for Court-appointed expert (5.5); draft email to potential expert Dr. Sunding regarding proposed scope of work (.4); Revise introduction to Motion for Court-appointed expert (.5)	6.40 500.00/hr	3,200.00
2/5/2015	RBK Litigation Strategy Work Further preparation of opposition to SPPS and Wood Class settlement (6.5).	6.50 500.00/hr	3,250.00
	LB Pleading Draft Motion for Court-appointed Expert	5.50 500.00/hr	2,750.00
2/6/2015	RBK Litigation Strategy Work Preparation of separate statement for SPPS opposition (4.0).	4.00 500.00/hr	2,000.00
	LB Pleading Review outline of alternative proposed physical solutions drafted by R. Kalfayan	0.50 500.00/hr	250.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/7/2015	LB Research Review and analyze chart of specific objections to SPPS created by R. Kalfayan	1.50 500.00/hr	750.00
2/9/2015	RBK Litigation Strategy Work Further preparation of opposition to Wood class motion and SPPS (6.0).	6.00 500.00/hr	3,000.00
2/11/2015	IK Litigation Strategy 4 Proposals Outline	6.20 200.00/hr	1,240.00
2/12/2015	RBK Litigation Strategy Work Further preparation of opposition to SPPS and discussions with potential experts regarding provisions in SPPS (6.0).	6.00 500.00/hr	3,000.00
2/13/2015	LB Pleading Review and analyze proposed scope of work of expert Dr. Sunding (.8); review Dr. Sunding's expertise and qualifications (.6); discuss same with R. Kalfayan (.1)	1.50 500.00/hr	750.00
2/16/2015	RBK Litigation Strategy Work Further research and preparation of opposition to SPPS (7.5).	7.50 500.00/hr	3,750.00
2/17/2015	RBK Litigation Strategy Work Further preparation of opposition to SPPS.	7.00 500.00/hr	3,500.00
2/18/2015	RBK Litigation Strategy Work Further preparation of opposition to SPPS.	5.00 500.00/hr	2,500.00
	LB Research Review and analyze draft opposition to SPPS (1.0); draft memorandum with overall comments and suggested edits to opposition (1.0)	2.00 500.00/hr	1,000.00
2/19/2015	RBK Litigation Strategy Work Further preparation of separate statement of inconsistencies and opposition to SPPS (4.5).	4.50 500.00/hr	2,250.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/19/2015	LB Research Analyze 2013 Antelope Valley Water Rates Report for support for opposition to SPPS	1.50 500.00/hr	750.00
2/20/2015	IK Litigation Strategy Drafting Opposition to SPPS	4.10 200.00/hr	820.00
2/22/2015	LB Pleading Draft and edit Motion for Court-appointed Expert	5.30 500.00/hr	2,650.00
2/24/2015	LB Pleading Review R. Kalfayan edits and make edits to Motion for Court-appointed Expert and Motion for Order Seeking Additional Attorneys' Fees	2.50 500.00/hr	1,250.00
2/25/2015	LB Pleading Draft and edit Motion for Court-appointed Expert	7.50 500.00/hr	3,750.00
2/26/2015	LB Pleading Review Minute Order regarding continuance of Court hearing and related filing dates and Wood Class' filing regarding Request for Continuance (.1); Revise Motion for Court-appointed Expert (.5)	0.60 500.00/hr	300.00
2/27/2015	IK Litigation Strategy Worked on Objections and Inconsistencies	5.30 200.00/hr	1,060.00
3/3/2015	IK Litigation Strategy Helping to Organize citations for Motions	3.70 200.00/hr	740.00
3/4/2015	RBK Litigation Strategy Work Futher edits and preparation of motion in preparation for filing.	4.00 500.00/hr	2,000.00
	LB Pleading Edit Motion for Order to Seek Permission for Attorney's Fees and Motion for Expert	1.00 500.00/hr	500.00
3/5/2015	RBK Litigation Strategy Work Review of PWS and Wood Class motion for preliminary approval (2.5). Further preparation of opposition (5.0).	7.50 500.00/hr	3,750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/5/2015	LB Research Draft emails to R. Kalfayan regarding Phelan Pinon Hills' request to be excluded from Willis Class' Motion regarding Attorneys' Fees	0.20 500.00/hr	100.00
3/6/2015	RBK Litigation Strategy Work Further preparation of opposition brief (8.).	8.00 500.00/hr	4,000.00
	LB Research Review and analyze 2013 Report of Antelope Valley Water Rates for possible use in Opposition - 2.0; review and analyze other publicly available information regarding water rates in the Antelope Valley - 1.5; review and analyze draft outline of opposition to Stipulated Proposed Physical Solution ("SPPS") - 1.0; review and analyze spreadsheet of Alternative Proposed Physical Solutions ("APPS") - 1.0	5.50 500.00/hr	2,750.00
3/8/2015	LB Research Draft introduction to Opposition brief - 1.5; analyze draft APPS and draft email to R. Kalfayan with analysis and suggested edits - 1.0	2.50 500.00/hr	1,250.00
3/9/2015	RBK Briefs and Motions and Legal Research Further preparation of opposition brief to PS (7.2).	7.20 500.00/hr	3,600.00
	LB Pleading Draft declaration of Ralph B. Kalfayan in support of Opposition to SPPS and APPS - 4.5; discuss draft declaration of RBK with R. Kalfayan - .2	4.70 500.00/hr	2,350.00
3/10/2015	RBK Litigation Strategy Work Further research and preparation of opposition brief (6.5).	6.50 500.00/hr	3,250.00
	LB Pleading Draft and revise declaration of Ralph B. Kalfayan in support of Opposition to SPPS and APPS - 2.0; draft introduction to Motion for APPS - 1.5; analyze and edit separate statement of objections and inconsistencies regarding SPPS - 4.0	7.50 500.00/hr	3,750.00
3/11/2015	RBK Briefs and Motions and Legal Research Further preparation of opposition brief to motion for preliminary approval (8.0).	8.00 500.00/hr	4,000.00
	LB Pleading Draft and edit Opposition to SPPS, Declaration of RBK, APPS (Alternative Proposed Physical Solutions) and Separate Statement of	8.00 500.00/hr	4,000.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	Objections and Inconsistencies; review edits of Greg James re same; incorporate G. James' edits into various briefs as appropriate - 8.0		
3/12/2015	RBK Briefs and Motions and Legal Research Further preparation of opposition to motion for preliminary approval (8.0).	8.00 500.00/hr	4,000.00
	IK Litigation Strategy Work Reivew and check citations for Oppo and APPS.	6.00 200.00/hr	1,200.00
	LB Pleading Review email from Allan Graf, outside counsel for Archdiocese, regarding corrective Grant Deed and respond to same .2; Draft and edit Opposition to SPPS, Declaration of RBK, APPS (Alternative Proposed Physical Solutions) and Separate Statement of Objections and Inconsistencies; review edits of Greg James re same; incorporate G. James' edits into various briefs as appropriate - 9.5	9.70 500.00/hr	4,850.00
3/13/2015	RBK Briefs and Motions and Legal Research Final preparation of brief and attention to filing (8.0).	8.00 500.00/hr	4,000.00
	IK Litigation Strategy Finalization of Motions and Filing of Motions	8.30 200.00/hr	1,660.00
	LB Pleading Finalize Opposition to SPPS, Declaration of RBK, APPS (Alternative Proposed Physical Solutions) and Separate Statement of Objections and Inconsistencies; review edits of Greg James re same; incorporate G. James' edits into various briefs as appropriate	6.00 500.00/hr	3,000.00
3/16/2015	RBK Briefs and Motions and Legal Research Review of opposition to expert motion and fee motion (1.0). Preparation of reply (4.0). Research value issues and onerous terms for pumping (3.0).	8.00 500.00/hr	4,000.00
	LB Research Review and analyze opposition briefs filed by PWS and Wood Class - (1.5); discuss same with R. Kalfayan - (.2); research case law regarding Plaintiffs' reply brief regarding Motion to Add the Archdiocese as Class Representative (1.5); draft reply declaration of Archdiocese in support of Motion to Add the Archdiocese as Class Representative (.4); discuss second reply declaration of Archdiocese	3.70 500.00/hr	1,850.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	with Allan Graf, outside counsel for Archdiocese (.1)		
3/17/2015	RBK Briefs and Motions and Legal Research Further preparation of reply to expert motion (3.0) Further preparation of reply to fee motion (2.5) and preparation of opposing CMC statement (1.5)	7.00 500.00/hr	3,500.00
	LB Pleading Review and analyze Associated Press article regarding \$700 AFY price for water (.3); draft Second Reply Declaration of Archdiocese and analyze cases in support of same (3.0); draft email to Allan Graf, outside counsel for Archdiocese, regarding Second reply Declaration of Archdiocese (.2); draft letter (.2); review and edit draft reply to motion for attorneys fees (.5); review and edit draft CMC Statement (.5); draft memorandum regarding potential Motion to Enforce the Willis Settlement Agreement (.4)	5.10 500.00/hr	2,550.00
3/18/2015	RBK Briefs and Motions and Legal Research Final preparation of reply brief to expert motion (2.0). Final preparation of reply brief to fee motion (2.0). Final preparation of cmc statement (1.0)	5.00 500.00/hr	2,500.00
	LB Pleading Edit and finalize motion for attorneys fees, motion for expert, CMC Statement (7.0); draft email to Allan Graf, outside counsel for Archdiocese, regarding Second Reply Declaration of Archdiocese (.1)	7.10 500.00/hr	3,550.00
3/19/2015	IK Litigation Strategy Work Finalization and Filing of Motions with LMB	3.00 200.00/hr	600.00
	LB Pleading Finalize and file motion for attorneys fees, motion for expert, CMC Statement	4.50 500.00/hr	2,250.00
3/20/2015	IK Litigation Strategy Work Preparation of Materials for hearing and to send to Court	4.10 200.00/hr	820.00
	LB Pleading Review and analyze reply brief and motion to strike filed by Wood Class (.5); review and analyze reply brief filed by PWS (.3)	0.80 500.00/hr	400.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2015	RBK Litigation Strategy Work Preparation for oral argument on five motions: (1) prelim approval, (2) experts, (3) fees, (4) Archdiocese, and (5) cmc statement.	4.00 500.00/hr	2,000.00
	LB Research Prepare for March 26 Hearing	3.50 500.00/hr	1,750.00
3/24/2015	LB Research Prepare for March 26 Hearing including prepare outline of oral argument for Motion to Add Archdiocese as Class Representative (6.5); analyze appellate brief/Writ of Mandate filed by Phelan Pinon Hills and determine impact, if any, on Willis Class Motions pending before the Court (1.5)	8.00 500.00/hr	4,000.00
3/25/2015	RBK Litigation Strategy Work Meeting with Greg and Lynne to discuss strategy for hearing (2.0). Preparation for hearing (3.5).	5.50 500.00/hr	2,750.00
	LB Research Prepare for March 26 Hearing (5.5); meet with R. Kalfayan and Greg James to prepare for March 26 Hearing (1.5).	7.00 500.00/hr	3,500.00
	RBK Travel Travel to Los Angeles for hearing on preliminary approval (2.0).	2.00 500.00/hr	1,000.00
	LB Travel Travel to Los Angeles for March 26 Hearing (2.0)	2.00 500.00/hr	1,000.00
3/26/2015	RBK Ct. appearance Appearance at hearings on preliminary approval of Wood Class settlement, motion for expert, motion for fees, and motion for Archdiocese (2.0). Pre and post hearing meetings with counsel (2.0).	4.00 500.00/hr	2,000.00
	LB Ct. appearance Meet with R. Kalfayan and Greg James prior to Hearing to further prepare oral arguments (1.0); attend hearing (2.0).	3.00 500.00/hr	1,500.00
	RBK Travel Travel to San Diego (2.0).	2.00 500.00/hr	1,000.00



		<u>Hrs/Rate</u>	<u>Amount</u>
3/26/2015 LB	Travel Travel back to San Diego after March 26 Hearing (2.0).	2.00 500.00/hr	1,000.00
3/27/2015 LB	Research Review Court Order regarding notification to Court of non-stipulating parties desire to separately adjudicate claim (.1); discuss same with R. Kalfayan (.2); analyze general case strategy following Preliminary Approval of Wood Class Settlement and incorporated SPPS (1.0); discuss same with R. Kalfayan (.2).	1.50 500.00/hr	750.00
3/28/2015 LB	Research Draft memoranda regarding potential Motion to Strike regarding references to the Willis Class in SPPS and edits to Opposition to SPPS.	0.50 500.00/hr	250.00
3/29/2015 LB	Research draft email to R. Kalfayan regarding proposed changes to Opposition to SPPS	0.10 500.00/hr	50.00
4/2/2015 LB	General Research and analyze issues regarding Assertion of Claim and revisions to previously-filed Opposition to SPPS	3.00 500.00/hr	1,500.00
4/3/2015 LB	General Research pleadings, hearing transcripts, and SPPS for support for Assertion of Claim and related filings	3.50 500.00/hr	1,750.00
4/5/2015 LB	General Review and respond to emails from R. Kalfayan and Greg James regarding case strategy	0.50 500.00/hr	250.00
4/6/2015 LB	General Draft revised Alternative Proposed Physical Solutions; draft Assertion of Claim; review and analyze SPPS in support of same	7.50 500.00/hr	3,750.00
4/7/2015 LB	General Draft and finalize Assertion of Claim, revised Alternative Proposed Physical Solutions (APPS), revised Declaration of Ralph Kalfayan, and revised separate statement of facts.	7.50 500.00/hr	3,750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/9/2015	RBK Litigation Strategy Work Receipt and review of Order from Court regarding telephonic conference call to review and adjust CMO calendared dates.	0.20 500.00/hr	100.00
4/10/2015	RBK Ct. appearance Emails from Mike M regarding deposition of David Estrada (.2). Respond to emails (.2). Review of CMO and schedule in preparation for court ordered hearing (.5). Appearance at court ordered courtcall regarding scheduling and trial issues (.5). Email exchange with David Estrada regarding status of case (.4).	1.80 500.00/hr	900.00
	LB General Review emails regarding deposition notice for class representative David Estrada.	0.10 500.00/hr	50.00
4/12/2015	LB General Review and respond to emails regarding case strategy.	0.20 500.00/hr	100.00
4/13/2015	RBK Litigation Strategy Work Meeting with David Estrada (2.5). Preparation of email to client regarding status of case and documents to review (.3). Meeting with counsel to discuss strategy for opposing physical solution (.7). Telephone conference with Greg yesterday regarding strategy in response to CMO (.9).	4.40 500.00/hr	2,200.00
	LB General Draft Motion to Enforce Settlement Agreement (2.5); research and analyze cases regarding enforcement of settlement agreements and possible motion to strike portions of proposed stipulated judgment (4.5).	7.00 500.00/hr	3,500.00
	RBK Travel Travel to Newport to meet with David Estrada and discuss status of case (1.0). Travel back to San Diego (1.0).	2.00 500.00/hr	1,000.00
4/14/2015	RBK Litigation Strategy Work Telephone conference with Lynne regarding brief to determine consistency (.4).	0.40 500.00/hr	200.00
	LB General Analyze proposed groundwater legislation and its potential impact on Willis Class (2.5); review and analyze Greg James' email regarding same (.3); review and analyze transcript from March 26, 2015, hearing and draft and review emails regarding same (1.5); draft Motion to	7.80 500.00/hr	3,900.00