

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Kevin Faile, Louis C. Roman, Alan R.)
DePalma, and Brian Scott Craton, all)
individually and on behalf of all)
other similarly situated individuals,)
)
Plaintiffs,)
vs.)
)
Lancaster County, South Carolina,)
)
Defendant.)
_____)

Civil Action No. 0:10-cv-2809-CMC

**AFFIDAVIT OF PLAINTIFFS’
COUNSEL, DAVID E.
ROTHSTEIN**

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)

PERSONALLY appeared before me David E. Rothstein, who, after being duly sworn, deposes and states the following:

1. My name is David E. Rothstein. I am older than eighteen years of age. The statements in this Affidavit are based upon my own personal knowledge.
2. I am counsel for Plaintiffs in the above-captioned case.
3. I am an attorney in good standing and have been licensed to practice law by the State of South Carolina since November 15, 1993, and by the State of North Carolina since April 11, 2008. I am also admitted to practice before the United States District Court for the District of South Carolina, the United States District Court for the Western District of North Carolina, the United States Court of Appeals for the Fourth Circuit, and the United States Supreme Court.



4. I graduated cum laude from the University of South Carolina School of Law on May 14, 1993, where I was Editor in Chief of the South Carolina Law Review, a member of the Order of the Coif, and a member of the Order of the Wig and Robe.

5. Upon graduation from law school, I served as a judicial law clerk to the Hon. Joseph F. Anderson, Jr., United States District Court Judge for the District of South Carolina, from August 1993 to August 1995. Thereafter, I served as a judicial law clerk to the Hon. Robert F. Chapman, then Senior United States Circuit Court Judge for the Fourth Circuit Court of Appeals, from August 1995 to October 1996.

6. I worked as an associate attorney at the law firm of Nexsen Pruet Jacobs & Pollard, LLP, in Columbia, South Carolina, from October 1996 to January 1999, where the majority of my practice involved employment law. While employed at the Nexsen Pruet firm, I represented both employers and employees in employment litigation and appeals.

7. I worked as an associate attorney at the law firm of Gergel Nickles & Solomon, P.A., in Columbia, South Carolina, from January 1999 to June 30, 2005, where the majority of my practice involved employment law.

8. I was a shareholder in the law firm of Burnette & Rothstein, P.A. from July 1, 2005 until July 31, 2010, when I moved to Greenville and formed Rothstein Law Firm, PA, which is currently a solo practice. Almost all of my current practice involves employment law and litigation.

9. I have been a Certified Specialist in Employment and Labor Law since February 2006. Although I primarily represent individual employees in employment-related matters, my firm also represents several small employers in employment-related matters.

10. I currently serve as an associate member of the South Carolina Board of Law

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Examiners, which position I have held since January 2007.

11. I have had extensive experience in employment litigation, both as an attorney and as a judicial law clerk to two federal judges. In addition, I have written several articles and made numerous CLE presentations on employment law or related topics. I am a member of the Employment Law Sections of the South Carolina Bar, the South Carolina Trial Lawyers Association, and the National Employment Lawyers Association. I am the immediate past Chair of the Employment and Labor Law Section Council of the South Carolina Bar (2011), and I am currently a member of the Specialization Advisory Board for Employment and Labor Law through the South Carolina Commission on CLE and Specialization.

12. Throughout my career, I have been involved in several class actions under Rule 23 of the Federal Rules of Civil Procedure, as well collective actions under the Fair Labor Standards Act. I was involved as trial counsel in the case of Johnson v. Collins, one of the largest class actions in the history of South Carolina, which led to the demise of the video poker industry in South Carolina. I have also handled numerous individual cases under the Fair Labor Standards Act for improperly paid overtime.

13. This case has involved substantial discovery, including two sets of interrogatories, three sets of requests for production, and one set of requests for admissions propounded by Plaintiffs. In addition, Plaintiffs responded to extensive interrogatories and request for production from Defendant, which were answered on behalf of each named Plaintiff as well as the members of the Plaintiffs' Steering Committee. Plaintiffs also took the depositions of seven fact witnesses, as well as Defendant's expert witness, and Defendant took the depositions of all four named Plaintiffs and one of Plaintiffs' experts. All depositions required extensive preparation. I have has reviewed over

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9,000 separate documents produced by Defendant, along with voluminous computer data regarding payroll, work schedules, time-keeper records, and summaries of EMS dispatches for the 3-year period covered by the lawsuit.

14. This case also involved substantial motions practice in an effort to clarify the legal issues for trial or settlement purposes. Plaintiffs filed a motion for partial summary judgment raising five separate legal issues. Defendant conceded liability on two issues, and the court deferred ruling on the other three issues, granting the motion in part and denying the motion in part, without prejudice. This case has involved some incredibly technical legal issues, which have required substantial legal research and analysis. I have also worked closely with Plaintiffs' three expert witnesses to perform very tedious calculations and to verify and validate the time and payroll records from the County's EMS Department. Defendant filed a motion in limine in an effort to have the opinions of one of the experts precluded or limited, which also required substantial research and briefing on my part.

15. Attached is a detailed summary of the time I have spent on this case from late October 2010 through the date of this Affidavit. (Attachment 1). I have spent over 1190 hours of time in connection with this case, which represents approximately 40% of my entire billable time during the 15-month period covered by the lawsuit. I believe that the time recorded on the attached summary is reasonable and was necessary in the prosecution of this case. I anticipate having to spend another 30-40 hours in connection with the settlement approval process and the distribution of the settlement proceeds. I am also attaching a detailed summary of the time my legal assistant, Lorry Miller, has spent in connection with this case. (Attachment 2). Ms. Miller has recorded 35.6 hours of time in connection with this case. I believe that a fair hourly rate for a competent legal assistant with Ms.

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Miller's experience and credentials is \$75.00 per hour.

16. In addition, I am attaching a detailed summary of the costs I have expended in connection with this case. (Attachment 3). I have been very careful to keep the expenses in this case as low as possible, and I have not sought advances or reimbursement from the named Plaintiffs, any opt-in members of the Plaintiff class, or any of the members of the Plaintiffs' Steering Committee. I believe that the expenses are reasonable and were necessary in the prosecution of this case.

17. The staffing and funding of this case has been a difficult undertaking for my firm, which is a solo practice sharing one legal assistant with another law firm. Throughout the pendency of this case, I have been unable to accept a lot of work for other potential clients that I otherwise would have been able to handle, much of it on an hourly basis. I repeatedly considered associating another law firm to assist me with the work-load and expenses of this case; however, I ultimately determined that my firm could handle this matter alone, and I decided that associating another firm might not be in the best interests of the Plaintiff class.

18. My regular hourly rate in employment cases is \$300.00 per hour. I generally anticipate receiving a premium above my normal hourly rate when I take cases on a contingency basis, because of the additional risks involved in taking such cases. I am very selective about what cases I take on a contingency basis, especially because employment cases are generally difficult and can involve investment of hundreds of hours of time. For individual employment cases, my standard contingency percentage is 33.33% of any recovery prior to filing suit, which increases to 40% after suit is filed. I agreed to handle this case on a one-third contingency fee case, rather than 40%, because of the economies of scale involved in representing multiple, similarly-situated Plaintiffs who share common legal and factual issues.

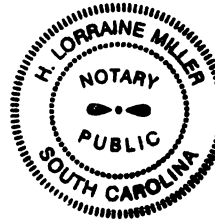
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FURTHER AFFIANT SAYETH NOT.

David E. Rothstein
David E. Rothstein

SWORN to and subscribed before me,
this 24th day of January, 2012.

H. Lorraine Miller (L.S.)
Notary Public for South Carolina



**H. Lorraine Miller
NOTARY PUBLIC
State of South Carolina
My Commission Expires
March 29, 2017**

My commission expires: 3/29/17.

Attachment 1

Louis Roman, Kevin Faile, Scott Craton and Al DePalma, et al.

(File Nos. 10-535, 10-536, 10-537, and 10-539)

Rothstein Law Firm, PA
David E. Rothstein

Date	Description	Time
10/22/2010	TC from Mr. Roman to discuss case; e-mail to Mr. Roman about case	0.8
10/27/2010	Meeting with Mr. Roman and Mr. Faile to discuss overtime case in Lancaster County; research re: FLSA; draft consent forms; draft fee agreement; prepare consent forms for opt-in plaintiffs; e-mail to Roman and Faile about case	3.2
10/28/2010	Research re: FLSA; draft complaint; e-mails to/from clients about case; e-mail draft of complaint to clients; prepare fee agreements for Craton and DePalma; e-mail to Roman and Faile	10.5
10/29/2010	Finalize complaint; prepare summons; prepare local rule 26.01 interrogatory responses; prepare civil cover sheet; receive and review consent forms for Faile, Roman, Craton & DePalma, Biggs, Bodenheimer, Roberts, Walden, L. Adams, Catoe, Garcia, Hoke, D. Demby, J. Demby, J. Humphries, and Ortega; file complaint and other documents; e-mail to clients about case	8.8
11/1/2010	Receive NEFs for case; receive summons; receive and review consent form for K. Holloway; prepare/file notice of consent; e-mail file-stamped copy of complaint to clients; e-mail to clients regarding list of opt-in plaintiffs	1.3
11/2/2010	Receive and review consent form for M. Humphries; prepare/file notice of consent	0.8
11/3/2010	Receive amended NEFs for complaint and consents; research re: Lancaster County; prepare service letter; TC to Linda Edwards about Lancaster County case; e-mail to clerk's office about cleaner copies of consent forms; prepare letter to Lancaster County administrator for service	1.5
11/4/2010	E-mail to Chris Johnson about complaint; TC from Lancaster News about case; e-mail complaint to Lancaster News reporter; e-mail from Roman about news reports; e-mail to Roman	1.1

11/5/2010	Receive and review consent forms for Champion, Polston, Brady, Brasington, Payne & Mann; prepare/file notices of consents e-mail from Lorry re: service of process; e-mail from Roman re: new shift change policy at LCEMS	1.2
11/8/2010	Receive and review consent forms from Diaz, Green, Stricker, Dazzo, Bell, Clemmer, W. Adams, Vincent & Glenn; prepare/filed notices of consents; e-mails to and from clients about case; e-mail to Lorry about case; revise opt-in form; e-mail to Mr. Roman; e-mail from Roman; receive and review return to certified mail	1.2
11/9/2010	Receive and review consent form from Russell Rogers; prepare/file notice of consent; e-mail from Lorry about case; e-mail to Lorry about case; e-mail from Roman	1.0
11/10/2010	Receive and review consent forms from Willis, Mathews, Snipes (2), Staehr, and Loftin; prepare/file notices of consents; E-mail from Mr. Johnson about extension; e-mail to Mr. Johnson; e-mail to Lorry about opt-in plaintiffs; e-mails to and from Roman to discuss case; e-mail from Roman re: sick leave policy; e-mail to Roman; update clients about opt-in list	1.8
11/11/2010	TC to Dirk Aydlette to discuss privileged document found on Faile's windshield; e-mail to Aydlette; receive and review consent form for Ed Abbott; prepare/file consent; review proof of service from Lorry	0.9
11/12/2010	Finalize and file proof of service	0.2
11/14/2010	Prepare agenda for upcoming meeting with potential plaintiffs; e-mail to plaintiffs about meeting	1.2
11/15/2010	Receive and review consent forms from Plyler, Luther, Rouse, T. Robinson, M. Robinson, Camp, D. Roberts, J. Faulkenberry & T. Faulkenberry; prepare/file notice of consents; research re: FLSA; e-mail from DePalma; e-mail to DePalma; prepare for meeting; e-mail from Roman about meeting agenda; e-mail to Roman; e-mail to clients with updated opt-in list	7.6
11/16/2010	Travel to and from Kershaw for meeting with potential class members; attend meeting with potential class members; receive and review consent form for Becky Mathews; prepare/file notice of consent	7.3
11/17/2010	TC from Lancaster reporter about case	0.4
11/21/2010	E-mails to and from Mr. Roman about case	0.5

11/22/2010	TC to Rita Snipes about case	0.4
11/29/2010	Receive and review consent forms for Gainey and Sims; prepare and file notices of consent; receive and review payroll records for Russell Rogers	0.8
12/1/2010	Receive and review consent form for Mahnfeldt; prepare and file notice of consent; TC to Roman about case	0.7
12/2/2010	E-mail for Chris Johnson	0.1
12/3/2010	TC to Roman to discuss case	0.1
12/7/2010	TC to Roman to discuss case	0.4
12/15/2010	Receive and review answer from Lancaster County; e-mail to clients about answer; e-mail to Johnson & Aydlette about service issue	1.2
12/16/2010	E-mail from Aydlette	0.1
12/17/2010	Receive and review spreadsheet of back-pay calculations from Mr. Johnson; e-mail to clients about spreadsheet; review and analyze spreadsheet from County; prepare revised spreadsheets; e-mail to Mr. Johnson about case; e-mail to clients about revised spreadsheets; TC to Mr. Johnson to discuss case	13.1
12/18/2010	Analyze spreadsheet from County	10.6
12/19/2010	Draft discovery to Defendant; e-mail to clients about discovery to Defendant; review spreadsheet from County	7.7
12/20/2010	E-mail from Johnson; e-mail to clients; e-mail to Johnson; e-mail from Roman about draft of discovery; e-mail to Roman	0.4
12/28/2010	E-mail to Johnson about case, spreadsheet and damages calculations; e-mail from Roman about scheduling order; e-mail to Roman; TC to court about scheduling order; receive and review scheduling order; docket deadlines; TC to Mr. Roman to discuss case	2.2

12/29/2010	Work on spreadsheet calculations re: sleep time; draft requests for admissions to Defendant; e-mail to clients about revised spreadsheet and discovery; e-mail to clients about scheduling order; e-mail from Roman about discovery; prepare first set of interrogatories and requests for production to Defendant; prepare service letters	9.5
1/1/2011	E-mail from Roman about case; e-mail to Roman	0.8
1/7/2011	TC to Johnson to discuss case	0.6
1/11/2011	E-mail from Johnson	0.1
1/20/2011	TC to Mr. Roman to discuss case; e-mail from Roman; e-mail from Faile; e-mail to clients about retaliation	1.6
1/21/2011	TC to Mr. Johnson to discuss drug transfer issue; Rule 26(f) conference; TC to Mr. Faile; TC to Mr. Roman; e-mail from Roman about retaliation	3.2
1/24/2011	E-mail from Johnson about drug transfer issue	0.2
1/26/2011	E-mail from Johnson about management changes to LCEMS; e-mail to clients; e-mail to clients about drug transfer issue	0.3
1/27/2011	E-mail from Lancaster reporter about case; TC to Mr. Johnson	0.2
1/29/2011	E-mail from Faile	0.2
1/30/2011	E-mail from Faile	0.2
1/31/2011	E-mails to/from Johnson about 26(f) report; e-mail to/from Johnson re: extension on discovery responses; e-mail to clients about drug transfer issue; TC to Mr. Faile	1.3
2/1/2011	Receive and review Defendant's Rule 26(f) report and 26.03 responses; TC to clients to discuss case; prepare and file 26.03 responses	2.2
2/3/2011	TC to Russell Ferguson to discuss employment with Lancaster County EMS	0.4
2/4/2011	E-mails to and from Roman about scheduling committee meeting	0.2
2/7/2011	E-mail from Roman about committee meeting; receive Defendant's first set of discovery responses; TC to Mr. Johnson to discuss case	8.3
2/8/2011	Review documents from Defendant	6.5
2/10/2011	Review documents from Defendant; TC to Faile and Roman about discovery response	5.9

2/15/2011	E-mails to/from Johnson about confidentiality order; prepare for committee meeting; research re: FLSA; TC to Johnson; research re: Chester County EMS director	6.1
2/16/2011	Travel to and from Ft. Mill for meeting with Plaintiffs' steering committee; meeting with Plaintiffs' steering committee	5.2
2/17/2011	E-mail from Faile about ePro records; research re: ePro scheduler; TC to Faile about County's documents	6.4
2/18/2011	E-mail from Johnson re: proposed confidentiality order	0.5
2/22/2011	E-mail to Bert Louthian about previous complaints to Lancaster County about overtime pay policies; e-mails to/from Herb Louthian	0.4
2/24/2011	E-mail from Johnson about dispatch cards; e-mail to clients; meeting with Kelly Wessel; e-mail to clients about case; TC to Louthians about previous complaints about LCEMS overtime policies	2.4
2/25/2011	E-mail to clients about dispatch cards; TC to Mr. Roman; TC to Mr. Faile	0.6
2/28/2011	TCs to Mr. Roman to discuss case	1.2
3/1/2011	Receive and review discovery from Defendant; TC to Roman; TC to Faile	1.5
3/8/2011	TC from Chris Johnson about case	0.3
3/9/2011	E-mail from Johnson about motion for confidentiality order; e-mail to Johnson	0.4
3/10/2011	E-mail to clients; meeting with Kelly Wessel to discuss case	2.5
3/11/2011	Receive and review motion for confidentiality order; e-mail from Johnson with proposed order; receive and review filed order from Court	0.6
3/15/2011	Receive and review supplemental discovery responses; review documents	4.8
3/17/2011	Review documents from Defendant	6.0
3/18/2011	Review documents from Defendant; TC to clients about documents	4.5
3/22/2011	Receive consent form from Clay Catoe	0.2
3/28/2011	TC to Mr. Johnson about case	0.1
4/1/2011	E-mail to Johnson about mediation; TC to Roman	0.5

4/4/2011	E-mail from Johnson about mediation	0.2
4/6/2011	TC to Chris Johnson to discuss case; e-mail from Johnson about case	0.5
4/7/2011	TC to Chris Johnson about case	0.1
4/8/2011	E-mail from Johnson about Ricky Bell; receive and review supplemental discovery responses from Defendant	5.2
4/14/2011	E-mail from Johnson about case	0.2
4/20/2011	TC to Faile to discuss case; TC from Roman	0.9
4/25/2011	TC to Faile to discuss case	0.3
4/26/2011	TC to Roman to discuss case; TC to Faile	0.4
4/27/2011	TC to Roman to discuss case; TC to Johnson	1.4
5/10/2011	TC from Faile; e-mail to clients about County's discovery to Plaintiffs; e-mail from Johnson about discovery responses	0.5
5/12/2011	TC to Chris Johnson to discuss case; receive and review motion for extension	0.3
5/13/2011	Order on motion for extension	0.1
5/16/2011	E-mails to/from Johnson re: discovery responses and mediation	0.7
5/17/2011	E-mail from Johnson re: mediation	0.2
5/19/2011	TC to Johnson	0.1
5/23/2011	E-mail from Johnson to Lewis re: mediation	0.1
5/27/2011	Receive and review expert disclosure from County; TC to Roman; review expert report	4.8
6/1/2011	Receive and review Woodside report; e-mail to Johnson about Woodside report and mediation; e-mail to clients about Woodside report; review and analyze dispatch report summary; e-mail to clients about dispatch report summary; e-mail from Faile about dispatch summary; e-mail to Faile	6.5
6/2/2011	TC from Faile; e-mail from DePalma; TC to Faile to discuss MICS system; research re: Colleton Software	4.4
6/6/2011	E-mails to/from Johnson about discovery responses	0.2

6/7/2011	TC to Mr. Johnson to discuss case; e-mails to/from Johnson about mediation, dispatch data, Woodside report, and discovery responses; TC to Faile; TC to DePalma; TC to Craton	3.8
6/8/2011	TC to Mr. Johnson about case; e-mails to/from Johnson about mediation and discovery; e-mail to clients about mediation and depositions; research re: regulations under FLSA	2.7
6/9/2011	E-mails to/from Johnson about discovery; research re: locations for mediation; e-mails to and from Johnson about mediation sites; e-mails to and from clients about mediation; TC from Roman; e-mail from Roman about mediation space	1.6
6/10/2011	E-mails to and from Johnson and Lewis about mediation location; TC's reserve mediation spot; e-mails to clients about mediation	1.4
6/11/2011	E-mail from DePalma; TC to Faile	0.3
6/13/2011	TC from Faile to discuss case	0.2
6/14/2011	TC from Faile	0.3
6/15/2011	TCs from Faile; TC from Roman; e-mail from Johnson; prepare for meeting of Plaintiffs Steering Committee	6.8
6/16/2011	TC to Roman; TC to Johnson; travel to and from Rock Hill for meeting of Plaintiffs' steering committee to prepare for mediation	8.2
6/17/2011	E-mail to Johnson about discovery responses and mediation	0.6
6/18/2011	Prepare for mediation; e-mails to and from client about pre-emptive payments by County to non-opt-ins; prepare and file notice of consent for Clay Catoe	10.8
6/19/2011	Prepare for mediation; e-mail from Ortega	14.3
6/20/2011	Travel to and from Rock Hill for mediation; participate in mediation; TC from Roman; TC to Harris Butler about case	9.5
6/21/2011	E-mail to Mr. Johnson about case; TC to Harris Butler and Zev Antell about case; e-mail to Butler and Antell about case; e-mail from Johnson about case; e-mail to Butler and Antell; research re: FLSA issues	8.5
6/22/2011	TC to Kelly Wessel; TC to Jeff Yankow; e-mail to Wessel and Yankow confirming meeting; TC to Roman to discuss case; e-mail to Butler and Antell about experts	2.4

6/23/2011	TC to Chris Johnson about case; receive and review supplemental discovery responses	8.8
6/24/2011	Meeting with Wessel and Yankow; e-mail from Johnson; prepare proposed amended scheduling order; e-mail to Johnson; TC to Johnson to discuss scheduling order; e-mail from Johnson about proposed scheduling order; e-mails from Butler and Antell about case	4.4
6/25/2011	E-mail to Johnson about mediation expenses	0.1
6/27/2011	TC to Faile; TC with Judge Currie's chambers and Johnson about payments; receive and review revised expert report	2.2
6/28/2011	E-mail from Johnson about Faile's termination and other issues; research re: set-off issue; e-mail to Johnson about case; TC from Faile; TC to Roman; e-mail to Johnson; prepare motion to amend scheduling order; research re: ePro Scheduler	5.7
6/29/2011	TCs from Faile; file motion to amend scheduling order; e-mail proposed order to Judge Currie; receive amended scheduling order; docket deadlines; e-mail to Butler and Antell	1.8
6/30/2011	TC from Faile; draft status letter to opt-in Plaintiffs; e-mail to committee members about letter and scheduling order; e-mail to Butler and Antell; research re: potential expert witnesses; TC to potential experts; e-mail to potential experts	10.8
7/1/2011	E-mails to/from Johnson about depositions; e-mails to/from Butler; e-mails from Helen Ortega; e-mails from Butler and Antell about case; TC to Johnson; research re: Jeffrey Naftal	3.4
7/2/2011	E-mail from Helen Ortega	0.1
7/3/2011	E-mails from Adams and Ortega	0.2
7/5/2011	TCs from Faile; finalize letter to opt-in Plaintiffs; e-mail to Lorry about merge list for letter; TCs to Faile; work on discovery responses	7.8
7/7/2011	E-mail from Roman about EMS fund; e-mails from Johnson about depositions; TC to Roman; TC to Faile; TC to Craton; work on discovery responses	6.9

7/8/2011	Work on discovery responses; TC to Chris Johnson about discovery responses; e-mail to Judge Currie's law clerk about extension; e-mail to former LCEMS employee about prior complaints; e-mail from Johnson about scheduling depositions; e-mail from court about discovery extension; TC to Faile to discuss case; TC to clients about discovery responses	8.8
7/9/2011	Work on discovery responses; e-mail from Craton about address change	5.7
7/10/2011	E-mail to Johnson about depositions dates; work on discovery responses; e-mail from Faile; e-mail to committee members about former employees of LCEMS; TC to Roman; e-mail to Lorry about updating Craton's address	6.9
7/11/2011	TC from Roman; TC to Faile; TC to Jay Rinehart's office re: deposition space in Rock Hill; e-mail from Johnson about depositions; work on discovery responses; letter to Johnson enclosing discovery responses; e-mail to clients about depositions and discovery responses; order re: discovery responses	10.8
7/12/2011	E-mail to Johnson re: discovery responses; TC to court reporter; e-mail to court reporter about depositions	0.4
7/13/2011	E-mail from Larry Adams about case; e-mail from Lockley re: case; review articles from Lockley; TC to Dr. Lockley	7.2
7/14/2011	Receive invoice for mediation; research for motions; receive deposition notices for Plaintiffs; e-mail to Lockley about case	5.8
7/15/2011	Prepare deposition notices and subpoenas for Lanny Bernard and Donald Hyatt; arrange for service of subpoenas; TC to clients about depositions; TC to Mr. Johnson about depositions	4.8
7/18/2011	Prepare second set of discovery to Defendant; prepare service letter; e-mail from court reporter about depositions; research for motions	8.6
7/19/2011	Work on motion for partial summary judgment; research; work on motion for class certification; meeting with Kelly Wessel to review variances	10.4
7/20/2011	E-mail to Lockley about case; e-mail from Roman about Silver affidavit; e-mail to Roman about potential affidavit; work on motion for partial summary judgment and class certification; TC from Roman; TC from Silver	8.5

7/21/2011	TC to Johnson to discuss case; review policy manual; e-mail to Johnson about pay practices; draft affidavit for summary judgment motion; e-mail to Roman and Faile about affidavit; e-mail from Faile about draft affidavit; revise affidavit; e-mail final to Faile; work on briefs; TC to Roman; TC to Faile; research re: MICS software system and Colleton Softward	12.4
7/22/2011	E-mail from Antell; e-mail from Butler; work on motions; e-mail from Lorry confirming service of deposition subpoenas	8.5
7/23/2011	E-mail to committee members about motion for partial summary judgment; work on partial summary judgment motion	5.5
7/24/2011	Work on motions	6.6
7/25/2011	Finalize motion for partial summary judgment and briefs; finalize class certification motion and briefs; file motions; TC to clients	7.7
7/26/2011	E-mail to Lockley; e-mail to Lorry about courtesy copy of motion for partial summary judgment and motion for class certification; e-mail from Johnson about extension; receive copy of motion for extension to respond to motions; review e-mail from Kelly Wessel regarding variances; letter to court enclosing courtesy copy of brief	2.2
7/27/2011	TC to Chris Johnson to discuss case; TCs to Faile; review Lancaster County EMS manual and County HR Manual; e-mail to committee members; e-mail briefs to committee members; e-mail from Lockley; e-mail to Lockley	3.1
7/28/2011	TC to Faile; TC to Roman; TC from Faile; receive order granting Defendant's motion for extension; e-mail from DePalma; e-mail from Roman; letter to Willis about preserving documents	1.9
7/29/2011	TC to Faile; TC to Roman; e-mail to Mike Ey; e-mail from Mike Ey; e-mail from Johnson; e-mail to Johnson; e-mail from Wessel; TC to Yankow	3.2
8/1/2011	TC from Faile; e-mail from Johnson about case; e-mail to Johnson; e-mail to clients; prepare Third Request for Production; prepare service letter; e-mail to Johnson; TC to Johnson; e-mail from DePalma about depositions; e-mail to DePalma; e-mail from Wessel; TC to Faile	5.1
8/2/2011	E-mail from Johnson; e-mail to committee members about payments to non-opt-ins; e-mail from Roman; e-mail to Faile and Roman confirming conference call; e-mail to clients about PCR and MICS; research re: EMS stations	2.9

8/3/2011	Research re: locations of EMS stations and hospitals; prepare table of distances; e-mail to Yankow; meeting with Yankow; TC with Roman and Faile; e-mail from Faile; e-mail from DePalma about hospital addresses; e-mail to DePalma; TC to Faile; TC to Roman	6.3
8/4/2011	TC from Roman; analyze partial payment information from Woodside report; e-mail to Johnson about partial payments; e-mail to committee members about partial payments; e-mail to clients about certain non-opt-ins; e-mail from Faile; research re: NEMSMA listserv and Lanny Bernard	11.6
8/5/2011	TC to Roman; e-mails from Ms. Ortega; e-mail to Britt Lineberger; TC from Britt Lineberger to discuss case; e-mail to Roman about case	3.1
8/7/2011	E-mail to Lockley	0.2
8/8/2011	TC to Roman; TC to Faile; e-mail from Lockley; e-mail to Yankow; TC to Yankow; TC to Johnson to discuss deposition of Britt Lineberger; e-mail to Johnson about depositions; e-mail from Johnson about case; prepare deposition notice and subpoena for Lineberger's deposition; e-mails from Kat Holloway about case; e-mail from Johnson about expert; e-mail from Wessel	3.7
8/9/2011	Research re: attorney's fees; e-mail to Johnson; e-mail to Johnson about deposition dates; e-mail to Lockley; e-mail from Yankow	3.2
8/10/2011	E-mail from Yankow; e-mail to Yankow; e-mail to Johnson about Woodside deposition; research re: EMS data collection and analysis; e-mail to Johnson and Aydlette; TC to MICS software company; TC to DHEC about EMS data; TC from Aydlette about extension to class motion; e-mail to Yankow about MICS system information; TC to Johnson	8.8
8/11/2011	TC from Faile; TC to Faile; TC to Johnson; e-mail from Johnson re: sample MICS report; review and analyze report; e-mail to Yankow; e-mail to Johnson re: MICS data; e-mail from Yankow; TC to former employee Vickie Hoffecker about complaints about Lanny and Donald	4.2
8/12/2011	E-mail from Yankow; e-mail to clients about call data; e-mail to DHEC employee about EMS data; TC to Faile to discuss data; e-mail from Faile re: Yankow's question; e-mail to clients about deposition prep; e-mail from Wessel; TC to Johnson	3.2
8/13/2011	E-mail from DePalma	0.2

8/15/2011	TCs from Roman; e-mail from Johnson re: call data; e-mail from DePalma; e-mail from Adams; e-mails to/from Yankow; e-mail from Roman; e-mail from Faile; forward e-mails from clients to Yankow; TC to Colleton Software employee; e-mails to Johnson; prepare proposed motion to extend deadline for expert reports; e-mail to Johnson about payments to non-opt-ins; e-mail to DePalma; e-mail to clients about deposition prep	10.8
8/16/2011	E-mail from Johnson re: payment to non-opt-ins; e-mail to committee; e-mails to and from Faile about payments; work on analysis of pay records	8.7
8/17/2011	TC to Faile; TC to Roman; TC to Faile; TC from Faile; TC from Roman; travel to and from Columbia to inspect dispatch records; review dispatch records; e-mail from Johnson re: red-lines to class notice; prepare motion re: extension for expert reports; travel to Rock Hill for deposition prep; meeting with clients to prepare for depositions	12.4
8/18/2011	TCs from Faile; receive and review NEF granting extension to file expert reports; e-mail to experts about extension and about run report data	1.2
8/19/2011	TC from Faile; TC from Johnson; TC to Johnson; TC to Faile; e-mails to/from Johnson about proposed class order; type language for post-card reminder; e-mail to Johnson about proposed order; receive and review County's summary judgment brief; e-mail to clients about brief; e-mail from Roman; e-mail to Roman; receive County's response to class certification motion	6.9
8/21/2011	TC to Faile; TC from Faile; TC to Faile; prepare for depositions; TC to Faile	5.8
8/22/2011	TC to Faile; TC to Roman; TC to Roman; TC to Faile; TC from Faile; e-mail from Johnson about proposed class order; revise class notice; e-mail to Johnson; travel to Rock Hill for depositions; prepare for depositions; e-mail from Johnson re: discovery responses; e-mail from Ms. Vroegop about class certification; e-mail from Johnson; work on proposed order; deposition prep	18.4
8/23/2011	Defend depositions of Louis Roman and Kevin Faile; TC from Roman; TC to Faile; TCs from Faile; prepare of Bernard deposition; meeting with Craton to prepare for deposition; TC with Judge Currie's law clerk about class certification; receive/review stipulation on class motion	16.7

8/24/2011	Prepare for Bernard deposition; defend Craton deposition; take Bernard deposition; TCs to Roman; TC to Faile; prepare for Hyatt deposition	19.6
8/25/2011	Prepare for Hyatt deposition; defend DePalma deposition; take Hyatt deposition; TC from Faile; TCs to Roman; TC to Faile; receive and review class certification order; e-mail to clients; return to Greenville	13.2
8/26/2011	TC to Roman; TC to Faile; e-mail from Johnson about proposed notice; e-mail to Johnson with signed copy of notice; e-mail from Johnson about e-Pro test calculations; review spreadsheet from Johnson; e-mail to clients; e-mail to Johnson about report; e-mail from Faile; TC to Johnson	6.9
8/27/2011	TC from Faile; work on reply brief	8.8
8/28/2011	TC to Faile to discuss case; e-mail from DePalma; e-mail to DePalma; e-mail to clients about depositions; work on reply brief; prepare affidavit for Faile; e-mail to Faile	7.3
8/29/2011	TCs from Faile; finalize reply brief in support of Plaintiffs' motion for partial summary judgment; file brief; e-mail to Lorry to prepare courtesy copy for Judge; e-mail to clients about reply brief; e-mail from Kelly Wessel; receive request for protection from Johnson; order on protection request; e-mails from Faile	10.6
8/30/2011	TC from Faile; e-mail from Johnson re: address changes of class members; docket correction notice; TC to Johnson; prepare subpoena to Founders FCU; prepare service letter; review Defendant's Answers to Plaintiff's Second Set of Interrogatories; review documents responsive to RFPs	6.4
8/31/2011	TC from Roman; TC to Founders Federal Credit Union about subpoena; e-mail to Founders re: subpoena; TC to Faile	1.7
9/1/2011	E-mail from Johnson; e-mail from Larry Adams; TC to Johnson	0.5
9/2/2011	TC from Roman; e-mail to Johnson about case; prepare deposition notice for Perry Woodside; e-mail to Johnson	1.9
9/6/2011	TC from Faile; e-mail from Johnson about case; e-mail to committee members; e-mail to Johnson; receive consent from Prosser; prepare and file notice of consent; TC to Roman; letter from Johnson about discovery responses	1.9

9/7/2011	TCs from Faile; receive and review affidavits from Silver and Len Robinson; e-mail to clients about affidavits; e-mail from Johnson re: conflict; TC to Johnson; draft e-mail response to Johnson	2.9
9/8/2011	TC to Johnson to discuss case; TC to Faile	1.5
9/9/2011	TC to Faile; receive and review second request for production from Defendant	0.9
9/12/2011	TC to Faile; TC to Roman; e-mails from Faile about case	1.8
9/13/2011	TC to Roman; TC to Faile; TC to Johnson; TCs to Faile	0.6
9/14/2011	TC to Faile; TC from Faile; TCs to Roman; TC to Faile; e-mail from Johnson about Lineberger deposition; e-mail to Johnson; prepare for deposition; prepare deposition notices for Willis, Robinson and Naftal; TC to Mandy Powers about using her conference room; TC to Lancaster County Clerk of Court about using conference room for depositions; e-mail from Johnson about Naftal; prepare deposition subpoena for Naftal; e-mail to court reporter about deposition	14.2
9/15/2011	TC to Faile; TC to Roman; TC from Faile; meeting with committee members to discuss case; travel to and from Chester for Lineberger deposition; take deposition of Britt Lineberger; e-mail from Johnson about deposition	9.4
9/16/2011	TC to Johnson; e-mail from Johnson with settlement offer; e-mail to clients about offer and Lineberger deposition; e-mails from Faile, Roman, and DePalma; letters from court reporter about errata pages	1.8
9/18/2011	E-mail from Holloway	0.2
9/19/2011	TC from Faile; e-mail from Adams; prepare notice postcards	1.2
9/21/2011	TC to Faile; TC to Roman; TCs to Johnson; TC to Roman; receive and review NEF from court on motion for partial summary judgment; TC to Dirk Aydlette to discuss case; e-mail from Johnson about expert depositions; e-mail from Ortega	2.7
9/22/2011	Receive and review documents from credit union; research re: comedian from meeting; e-mail to comedian; e-mail to clients re: summary judgment order; e-mail to clients regarding comedian from meeting; e-mail from Roman; e-mail from Ortega	4.5
9/23/2011	E-mail to Chris Johnson about case; prepare deposition notice for Linda Edwards; TC from Chris Johnson about case; TC to court reporter to schedule deposition	0.6

9/27/2011	TC to Roman; TC to Johnson; e-mail from Johnson about Woodside deposition; e-mail to committee members about Woodside deposition; e-mail to Johnson confirming postponing of Woodside deposition; receive and review consent from King; prepare and file notice of consent; e-mails to/from Johnson about case; email from Johnson about undeliverable notices	2.4
9/28/2011	E-mail from Adams; finalize notice postcards; confirm mailing of postcards; e-mail from Ortega; receive and review Defendant's Second Supplemental Answers to Plaintiff's First Set of Interrogatories	2.4
9/29/2011	Prepare for Linda Edwards deposition; TC to court reporter about deposition	6.5
9/30/2011	TC to Roman; TC to Faile; TCs to Roman; travel to and from Columbia for deposition of Linda Edwards; take deposition of Linda Edwards	7.5
10/2/2011	Prepare for Willis deposition	8.5
10/3/2011	TC from Roman; e-mail to Johnson about Willis deposition; e-mail to clients about deposition transcripts; TC to Johnson; prepare for Steve Willis deposition	10.1
10/4/2011	TC from Roman; travel to and from Lancaster for Steve Willis Deposition; take deposition of Steve Willis; prepare for depositions of Naftal and Robinson	12.1
10/5/2011	TC to Faile; TCs to Roman; travel to and from Lancaster for depositions of Naftal and Robinson; take depositions of Naftal and Robinson	12.2
10/6/2011	TC to Johnson	0.1
10/8/2011	E-mail to Lockley; work on damages calculations for expert report; e-mail to clients about damages calculations and settlement negotiations; e-mail to clients about opt-ins	4.5
10/9/2011	E-mail from Lockley; e-mail to Lockley; work on expert disclosures; e-mail to Yankow	6.2
10/10/2011	TC to Roman; e-mails from Lockley; work on expert disclosures; TC to Lockley; review and revise drafts of reports; TC to Kelly Wessel re: variance report	9.8

10/11/2011	TC from Lockley; TCs to Yankow; TC to Johnson; TCs to Roman; work on expert disclosures; review and revise drafts of reports; e-mails and TCs to experts; file and serve expert disclosures; e-mails to Johnson and Aydlette re: expert reports; e-mails to clients about expert reports; e-mail from Wessel	16.7
10/12/2011	Receive and review Naftal's PowerPoint presentation from Oct. 2010 meeting; e-mail to clients about PowerPoint; e-mail from Faile; e-mail to committee	1.4
10/13/2011	TC to Roman	0.4
10/16/2011	E-mail to clients about damages calculations and settlement negotiations; e-mail to clients about deposition errata pages; e-mail from Ortega; e-mail to Ortega about meeting; e-mail from DePalma about PowerPoint	1.6
10/17/2011	TC to Roman	0.1
10/19/2011	TCs to Johnson; travel to and from Fort Mill for committee meeting; meeting with Plaintiffs' steering committee; e-mail settlement proposal to Chris Johnson	9.3
10/20/2011	Receive and review consent form for Melissa Munn; file document; e-mail to court about redacted document	0.5
10/24/2011	E-mail from Johnson re: expert tables; e-mail to Johnson	0.3
10/25/2011	TC to Faile	0.3
10/26/2011	TC to Roman	0.1
10/27/2011	TC from Roman; e-mail to Johnson with copies of spreadsheets	0.2
10/28/2011	TC to Johnson to discuss case	0.2
10/30/2011	Analysis of time records in ePro; work on spreadsheet comparing time records	3.5
10/31/2011	TC from Roman; e-mails from Roman about reporting issues	0.2
11/2/2011	Receive and review Defendant's motion in limine and brief; TC to Johnson	3.1
11/3/2011	E-mail to clients about motion in limine; e-mails from clients about motion	1.4
11/6/2011	E-mail motion in limine to experts	0.3

11/9/2011	E-mail from Johnson about discovery responses; e-mail from Johnson about deposition dates; e-mail from Roman	0.3
11/10/2011	E-mail from Johnson re: expert depositions; e-mail to Johnson; research re: Chap Hurst; e-mail to Chap Hurst; e-mail to Yankow about deposition dates; receive and review revised expert report from County; e-mail to clients about revised expert report; review revised report; e-mail to Yankow about revised report	3.7
11/11/2011	E-mail to Johnson about case; e-mail to court reporter about expert depositions; e-mail from Chap Hurst's office; e-mail from Yankow; e-mail from Johnson; TC from Yankow re: revised Woodside report; TCs to Johnson	2.9
11/15/2011	E-mail from Chris Johnson about settlement offer; e-mail to committee members; TC to Roman; TC to Faile; e-mail to Yankow; TC to Yankow; e-mail to clients about revised expert report; e-mails from clients about counter-offer	3.2
11/16/2011	TC from Faile; TC to Johnson; letter to court reporter enclosing errata sheet for DePalma	0.8
11/17/2011	TC from Johnson; TC to Faile; TC to Roman; TC to Faile; work on settlement apportionment scenarios; e-mail to committee members	4.6
11/18/2011	TC to Faile; TC to Johnson; TC to Roman; revise proposed settlement apportionment; e-mail to committee members; review depositions to prepare for mediation	6.9
11/19/2011	Work on brief in opposition to motion in limine	4.5
11/20/2011	Work on brief in opposition to motion in limine	5.0
11/21/2011	TC to Faile; TC to Johnson; finalize brief in opposition to motion in limine	4.6
11/25/2011	TC to Faile; travel to and from Fort Mill for committee meeting; meeting with Plaintiffs' steering committee	7.4
11/28/2011	TC to Johnson; letter to Johnson re: settlement proposal; e-mail to Johnson; e-mail from Johnson; e-mail to Johnson	2.7
11/30/2011	E-mail to clients about settlement negotiations; e-mail from Johnson requesting extension for reply brief; e-mail from Johnson about mediation; meeting with Yankow to prepare for deposition; work on deposition prep for expert; e-mail from Roman about mediation	6.6

12/1/2011	TCs to Roman; order on motion for extension; review depositions to prepare for mediation	8.4
12/2/2011	TCs to potential mediators to check availability; TC to Johnson to discuss mediation; analysis of ePro records; review depositions	11.0
12/3/2011	Work on analysis of ePro records; prepare for depositions	8.5
12/4/2011	Work on analysis of ePro records; prepare for depositions	7.7
12/5/2011	E-mail to Frank Shuler about mediation; e-mail to McCormack; e-mail from Shuler about potential conflicts; e-mail to clients about conflict; e-mail to Shuler; prepare for expert depositions; e-mail from Johnson about mediation	9.6
12/6/2011	TC to Chap Hurst; TC to Faile; TC to Roman; TC to Yankow; prepare deposition notice for Debbin Hardin; letter to Johnson enclosing deposition notice; e-mail to Johnson; prepare for expert depositions; receive and review amended report of Woodside; TC to Darryl Dube; e-mail to clients; e-mail from Johnson re: revised report; e-mail to clients; e-mail from Johnson about mediation; prepare PowerPoint for mediation	16.6
12/7/2011	Prepare for depositions; travel to and from Columbia for expert depositions; take deposition of Perry Woodside; defend deposition of Jeff Yankow; TC to Kevin Faile about depositions; e-mail to Roman about deposition	14.7
12/8/2011	TC to Roman; review MICS report sample; e-mail to Yankow with copy of report; receive and review invoice from Yankow; receive documents from Yankow; e-mail from Johnson about Hardin deposition	2.1
12/9/2011	TC to Yankow; e-mail from Yankow about invoice; receive and review County's reply brief; e-mail to clients re: reply brief; e-mails to and from Johnson about MICS report	2.3
12/12/2011	E-mail from Chris Johnson with proposed amended scheduling order; e-mail to Johnson	0.3
12/13/2011	TC to Roman; e-mails from Ms. Vroegop about proposed extension	0.8
12/15/2011	Receive NEF denying County's motion to exclude expert; e-mail to clients and experts; e-mail to Johnson about scheduling order; about order; TC to Roman; e-mail to Johnson about scheduling order; e-mail from Johnson	0.8
12/19/2011	E-mail to clients about mediation	0.2

12/20/2011	TC to Roman; TC to Faile; TC from Roman; prepare for mediation; e-mail from Johnson about scheduling order; confer with Lorry about time reports	14.7
12/21/2011	Travel to and from Columbia for mediation; participate in mediation; TC to Faile about mediation	13.5
12/22/2011	TCs to/from Faile; TC to/from Roman; TC to Johnson; TC from Frank Shuler about council meeting; TC to Chris Johnson; research re: case; e-mail from Chris Johnson; e-mail to clients about settlement offer; TC to Roman; e-mail to committee members about case; prepare revised apportionment calculations	9.5
12/23/2011	TC to Roman; TCs to/from Johnson; TC from Kat Holloway; e-mail to Frank Shuler about settlement; e-mail to Judge Currie's law clerk about settlement; e-mail to Yankow; e-mail to Lockley; e-mail from Holloway; research re: incentive payments; e-mail to committee about Holloway's comments; e-mail from Shuler; e-mail from Johnson about apportionment	5.1
12/24/2011	E-mail from Ms. Vroegop; e-mail to Ms. Vroegop	0.5
12/28/2011	TC with Virginia Vroegop and Chris Johnson about settlement; e-mail from Ms. Vroegop about scheduling approval hearing	0.6
1/2/2012	E-mail to committee about conference call	0.6
1/3/2012	E-mails to and from committee members about service payments; e-mail to Roman; work on settlement approval motion and related documents; e-mail to Lorry about change of address for Stacey Chapman; e-mail from Lockley about invoice	6.4
1/4/2012	Work on settlement documents; receive and review proposed release from Chris Johnson; TC to Mr. Johnson; e-mail to Johnson about release; prepare red-line of draft of settlement agreement; TCs to committee members about apportionment	8.2
1/5/2012	Draft notice of settlement; research re: settlement of FLSA cases; e-mail to Ms. Vroegop with draft of notice; e-mails and TCs to and from committee members about proposed apportionment; e-mails to and from Mr. Johnson about release; e-mail from Ms. Vroegop about draft of notice	10.7
1/6/2012	E-mail to Johnson about apportionment; work on apportionment spreadsheet; work on settlement documents; e-mail to FindLaw representatives about web-site	10.2

1/7/2012	Work on apportionment spreadsheet; e-mail to Committee Members re: revised apportionment; work on motion and brief to approve settlement; work on affidavits of committee members; work on settlement documents; e-mail to Johnson about revised, proposed apportionment	6.2
1/8/2012	Work on settlement documents	3.8
1/9/2012	E-mails to Roman about affidavit and settlement agreement; draft exemplar letters to class members; e-mails to/from Johnson about letters; e-mail to Johnson about address updates; e-mail to Ms. Vroegop about drafts of settlement documents; research and work on settlement documents	12.6
1/10/2012	E-mail from Ms. Vroegop about meeting; e-mail to Ms. Vroegop; work on settlement documents; e-mail to Lorry about address change for Joseph Rouse; prepare affidavit for Ortega; e-mail to Ms. Ortega; prepare Faile affidavit; e-mail to Mr. Faile about affidavit; TC to Mr. Faile; e-mail from Faile	13.8
1/11/2012	Meeting with Ms. Vroegop and Mr. Johnson to discuss settlement documents; TC to Ms. Ortega about settlement agreement; e-mail to committee members about meeting with law clerk; revise apportionment calculations; e-mail to Ms. Vroegop; work on settlement paperwork	9.1
1/12/2012	E-mail from Ms. Holloway about proposed apportionment; e-mail to Ms. Holloway; revise proposed settlement apportionment to include 100% of section 7(k) claim; work on settlement documents and brief; research; revise notice; e-mail revisions to Mr. Johnson; prepare revisions to letters; e-mail to Johnson; e-mail from Ms. Vroegop about schedule; e-mail from Johnson re: proposed order; review proposed order; e-mails to/from Johnson about Fersner	7.7
1/13/2012	E-mail to committee about revised apportionment; e-mail from Johnson about address of class members; work with Lorry about merge lists for letters and notices; e-mail to Johnson about spreadsheet of class members; work on settlement documents	8.2
1/14/2012	Work on brief; e-mail draft to Johnson	4.2
1/15/2012	Work on brief and affidavit; e-mail from Johnson about draft of brief	11.8

1/16/2012	Work on brief; e-mail revision to Johnson; revise proposed letters; revise proposed notice; revise settlement agreement; revise proposed order; e-mail to Johnson with revisions; finalize brief and file via ECF; e-mail proposed order to Judge Currie; e-mail to Lorry about courtesy copy of brief	15.3
1/17/2012	TC from Judge Currie's law clerk; work on supplemental brief	10.3
1/18/2012	E-mail proposed letter to opt-in plaintiffs to Ms. Vroegop; work on supplemental brief; e-mail from Roman; e-mail draft of brief to Johnson and Vroegop ; e-mail from Ms. Vroegop with revisions to draft notice and letter; e-mail from Johnson with revisions to letter and notice	11.9
1/19/2012	E-mail to Roman; e-mail from Vroegop about brief; e-mail to and from Johnson about supplemental brief; finalize supplemental brief; file supplemental brief via ECF; e-mail to FindLaw rep about putting documents on web-site; e-mail to Roman about status of settlement filings; revise notice and letter; e-mail revisions to Ms. Vroegop; e-mail from Johnson re: tax issue; review IRS opinion letter about wage apportionment	14.4
1/20/2012	TCs to Mr. Roman; e-mail from Mr. Johnson about settlement agreement; e-mail from Vroegop about draft of notice and letters; e-mail revised settlement agreement to Roman and Ortega; TC to Ms. Ortega; finalize revisions to notice and letters; e-mail revisions to notice and letters to Johnson; e-mail from Johnson; e-mails to Ms. Vroegop; meeting with Mr. Douglass about web-site	4.2
1/21/2012	TC from Larry Adams to discuss case; TC from Ms. Ortega; research re: attorney's fees in class action cases; work on attorney's fees motion and brief; e-mail from Douglass about web-site draft; e-mail to Douglass about revisions to web-site	4.7
1/22/2012	Work on attorney's fee motion and brief	8.9
	Total attorney hours	1194.4

Attachment 2

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
10/27/10	Intake - set up files, entered into client database, and set up case in tracking sheet.	45
11/3/10	DER letter to Lancaster County enclosing Summons; Complaint; Coversheet; Notice of Filing with Consent to Join for David W. Biggs, Dusty S. Bodenheimer, Terry C. Roberts, Stacey G. Walden, Larry N. Adams, Wendy Catoe, Sol Garcia, Jason Claude Hoke, David Demby, Janie Demby, Jason Humphries, and Helen Anne Ortega; Plaintiff's Answers to Local Rule 26.01 Interrogatories; Notice of Filing with Consent to Join for Katherine Holloway; and Notice of Filing with Consent to Join from Marty B. Humphries. Copy, prepare certified mailing documents, and mail. Updated case tracking sheet. File same.	30
11/08/10	ECF: Receipt of Notice of Joinder [Docket No. 11] for William R. Bell, Jr., Tim Clemmer, William Adams, Tammy Vincent, and Barton L. Glenn. Saved to system. Printed out. Updated Pleading Index & filed same. Updated spreadsheet on consents to join. Emailed updated spreadsheet to DER.	15
11/8/10	Telephone call from Alan Sanderson wanting to join lawsuit. Suggested he contact Kevin Faile since he was coordinating consents to join. Emailed DER.	15
11/8/10	Email to DER regarding updating spreadsheet of parties to include tracking receipt of fee agreements. Response email from DER stating we would only be receiving fee agreements from the main parties and request to go ahead set up file for Alan DePalma.	20
11/9/10	Email to DER about missing ECF filings. DER to make sure I get copies of filings.	5
11/9/10	Email to DER sending corrected copy of spreadsheet of consents to join. Desktop version was not saving to filed location on computer.	5
11/9/10	Receipt of email from DER re: Alan Sanderson being outside statute of limitations.	5

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
11/10/10	ECF: Receipt of Notice of Joinder [Docket No. 13] for Wayne Willis, Angela Staehr, Kelly D. Snipes, Keith Snipes, Franklin Mathews, and John E. Loftin. Saved to system. Printed out. Added to Pleading Index & filed. Updated spreadsheet on consents to join.	15
11/11/10	ECF: Receipt of Notice of Joinder [Docket No. 14] for Edward F. Abbott, Jr. Saved to system. Printed out. Updated Pleading Index & filed same. Updated spreadsheet on consents to join. Emailed updated spreadsheet to DER.	15
11/12/10	ECF: Summons Returned Executed [Docket No. 15]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
11/15/10	Receipt of Consents to Join from: Ned W. Plyler, Jr. Rhonda Luther Joseph T. Rouse Thomas G. Robinson Michele Robinson David Camp Dustin Roberts Josh Faulkenberry Terri Faulkenberry Scanned and saved to system. Updated spreadsheet for consents to join. Sent copies to DER.	45
11/15/10	ECF: Receipt of Notice of Joinder [Docket No. 16] for "Sonny" Ned W. Plyler, Jr., Rhonda Luther, Joseph T. Rouse, Thomas G. Robinson, Michelle Robinson, David Camp, Dustin Roberts, Joshua Eugene Faulkenberry, and Terri Faulkenberry. Saved to system. Printed out. Updated Pleading Index & filed. Updated spreadsheet for consents to join and emailed to DER.	15
11/16/10	ECF: Receipt of Notice of Joinder [Docket No. 17] for Becky Mathews. Saved to system. Printed out. Updated Pleading Index & filed. Updated spreadsheet for consents to join and emailed to DER.	15

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
11/29/10	ECF: Receipt of Notice of Joinder [Docket No. 18] for Meredith Gainey and Teresa Sims. Saved to system. Printed out. Updated Pleading Index and filed. Updated spreadsheet for consents to join and emailed to DER.	15
12/1/10	ECF: Receipt of Notice of Joinder [Docket No. 19] for Martin Uwe Mahnfeldt. Saved to system. Printed out. Updated Pleading Index and filed. Updated spreadsheet for consents to join and emailed to DER.	25
12/5/10	Updated spreadsheet for consents to join and emailed to DER.	15
12/15/10	ECF: Receipt of Defendant's Local Rule 26.01's [Docket No. 22]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
12/15/10	ECF: Receipt of Answer to Complaint [Docket No. 21]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
12/28/10	ECF: Receipt of Scheduling Order [Docket No. 24]. Saved to system. Printed out. Created Order Index and filed. Updated case tracking sheet.	15
12/29/10	DER letter to Chris Johnson enclosing Plaintiff's First Set of Interrogatories and Requests for Production, and First Set of Requests for Admissions to Defendant. Copy and mailed same. Filing of documents. Updated case tracking sheet.	20
2/1/11	ECF: Receipt of Plaintiff's Local Rule 26.03s [Docket No. 27]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
2/1/11	ECF: Receipt of Joint Rule 26(f) Report [Docket No. 25]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
2/1/11	ECF: Receipt of Defendant's Local Rule 26.03s [Docket No. 26]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
3/11/11	ECF: Receipt of Joint Motion for Confidentiality Order [Docket No. 29]. Saved to system. Printed out. Created Motion Index and filed. Updated case tracking sheet.	15
3/11/11	ECF: Receipt of Consent Confidentiality Agreement [Docket No. 30]. Saved to system. Printed out. Added to Orders Index and filed. Updated case tracking sheet.	15
5/12/11	ECF: Receipt of Defendant's Motion for Extension of Time to File Expert Witness Report [Docket No. 33]. Saved to system. Printed out. Added to Orders Index. Updated case tracking sheet. Received NEF deleting Docket No. 33 [Docket No. 34]. Then received NEF correcting document. Received - First Motion for Extension of Time to Identify an Expert and Provide a Report [Docket No. 35]. Then received corrected text for Motion for Extension of Time to Identify an Expert and Provide a Report [Docket No. 35]. Updated Motion Index and filed. Updated case tracking sheet.	20
5/12/11	ECF: Received Text Order granting Motion for Extension of Time to Identify an Expert and Provide a Report [Docket 36]. Printed out. Updated Order Index and filed. Updated case tracking sheet.	15
5/27/11	ECF: Receipt of Defendant's ID of Expert Witnesses [Docket No. 39]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
6/18/11	ECF: Receipt of Notice of Joinder for Clayton Catoe [Docket No. 40]. Saved to system. Printed out. Updated Pleading Index and filed. Updated spreadsheet of consents to join and emailed to DER.	15
6/20/11	Updated Spreadsheet of Parties and sent to DER - added Rhonda Luther, Joseph T. Rouse, Thomas G. Robinson, Michele Robinson, David Camp, Dustin Roberts, Josh Faulkenberry, Becky Matthews, Meredith Gainey, Teresa Sims, Martin Uwe Mahnfeldt, and Clayton Catoe	20
6/23/11	Received, reviewed, and scanned-in Defendant's Supplemental Discovery Responses. Updated case tracking sheet. Filed same.	20

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
6/29/11	ECF: Receipt of Consent Motion for Extension of Time [Docket No. 41]. Saved to system, printed out, updated Motion Index and filed. CORRECTED ECF: Receipt of Motion to Amend Scheduling Order [Docket No. 41]. Updated case tracking sheet.	20
6/29/11	ECF: Received Consent Amended Scheduling Order [Docket No. 42]. Updated case tracking sheet.	30
7/5/11	Mailing of 55 letters - confidential case status letter. Set-up merge database and document. Perform mailmerge, mail & file same.	120
7/8/11	Kevin Faile telephoned DER - took message	5
7/11/11	Kevin Faile telephone DER - took message	5
7/11/11	DER letter to Chris Johnson enclosing Plaintiffs' Answers to Defendant's First Interrogatories to Plaintiffs' and Plaintiffs' Responses to Defendant's First Request for Production along with documents Bates labeled 1-33. Scanned for DER to email. Copy, mail, and file same. Updated case tracking sheet.	30
7/11/11	ECF: Receipt of Text Order: By agreement of the parties, Plaintiff's deadline to respond to Defendant's discovery requests is extended to July 11, 2011 [Docket No. 43]. Printed out. Updated Order Index and filed. Updated case tracking sheet.	15
7/11/11	Scanned-in and emailed copy of Minutes to County Counsel meetings.	5
7/11/11	Corrected address for Scott Craton and emailed updated spreadsheet to DER.	5
7/14/11	Received deposition notices. Scanned and emailed to DER - Louis Roman, Alan Depalma, Brian Craton and Kevin Faile, along with coverletter. Updated case tracking sheet.	15

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
7/15/11	Miller letter to Bernard Investigations enclosing deposition subpoenas on Lanny Bernard and Donald Hyatt to be served. Enclosed DER letters and subpoenas and checks for appearance fees. Copied, mailed, and filed same. Rothstein letter to Chris Johnson enclosing copies of the deposition notices. Copied, mailed, and filed same. Updated case tracking sheet.	20
7/18/11	Copied, scanned and emailed to DER, and mailed copy of Plaintiffs' Second Discovery to Defendant. DER letter to Chris Johnson enclosing same. Copies, mailed, and filed same. Updated case tracking sheet.	20
7/22/11	Patrick Silver called for DER - took message	5
7/22/11	Telephone call to Bernard Investigations and confirmed to DER all deposition subpoenas had been served.	10
7/25/11	ECF: Receipt of Plaintiffs' Motion for Partial Summary Judgment (with attachments) [Docket No. 44 & 45]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet. Also received Corrective ECFs editing text.	20
7/25/11	Receipt of affidavits from Sybil Faile and Kevin Faile. Scanned, saved to system and email to DER	10
7/25/11	ECF: Receipt of Motion to Certify Class [Docket No. 46]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet. Corrective ECF - Later modified text to take out duplicative language.	20
7/26/11	Copied and sent courtesy copies of Motion for Partial Summary Judgment and Motion to Certify Class to Judge Currie.	30
7/26/11	ECF: Received Defendant's Motion for Extension of Time to File Response [Docket No. 47]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
7/27/11	Scanned-in Lancaster County Employee Manual, saved to system and emailed to DER	10

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
7/27/11	Call from Reese Murphy (Lancaster News) wanting to speak with DER. Took message.	5
7/28/11	DER letter to Steve Willis (Lancaster Co. Administrator) regarding grievance procedure for Kevin Faile. File correspondence.	5
8/8/11	Letter to Britt Lineberger with document subpoena - copied, scanned, and emailed to DER. Updated case tracking sheet.	10
8/11/11	Telephone call from Kevin Faile for DER. Took message.	5
8/17/11	ECF: Receipt of Consent Motion for Extension of Time for Expert Witness Disclosures [Docket No. 50]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
8/18/11	ECF: Received Text Order granting [50] Consent Motion for Extension of Time for Expert Witness Disclosures [Docket No. 51]. Saved to system. Printed out. Updated Order Index and filed. Updated case tracking sheet.	15
8/19/11	ECF: Receipt of Defendant's Response in Opposition re [44] Motion for Partial Summary Judgment [Docket No. 53]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet. Received ECF modification to remove duplicative text.	20
8/19/11	ECF: Receipt of Defendant's Response in Support re [46] Motion to Certify Class [Docket No. 54]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
8/23/11	ECF: Receipt of Defendant's Stipulation re [46] Motion to Certify Class, [54] Response in Support of Motion [Docket No. 55]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
8/25/11	ECF: Receipt of Consent Order granting [46] Motion to Certify Class [Docket No. 56]. Saved to system. Printed out. Updated Order Index and filed. Updated case tracking sheet.	15
8/29/11	Receipt of letter from Chris Johnson with mailing labels for EMTs who have not opted in to lawsuit. Filed.	5

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
8/29/11	ECF: Receipt of Plaintiffs' Response in Support re [44] Motion for Partial Summary Judgment Response [Docket No. 59]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet. Put together courtesy copy for Judge, prepared coverletter, copied and mailed.	30
8/29/11	ECF: Receipt of Text Order granting [57] Notice of Request for Protection from Court Appearance by Christopher W Johnson for 9/22/2011 through 9/26/2011 [Docket No. 58]. Saved to system. Printed out. Updated Order Index and filed. Updated case tracking sheet.	10
8/29/11	ECF: Receipt of Notice of Request for Protection from Court Appearance by Christopher W Johnson for 9/22/2011 through 9/26/2011 [Docket No. 57]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	10
8/30/11	ECF: Receipt of corrected filing [59] [Docket No. 60]. Receipt of ECF for deletion of Docket No. 59]. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	10
8/30/11	DER letter to Founders Federal Credit Union along with Subpoena <i>duces tecum</i> . Copied, mailed, and filed same. Noted due date 9/15/11.	15
8/31/11	Founders Federal Credit Union - telephone call to DER regarding document subpoena. Took message.	5
8/31/11	Telephone call from Kevin Faile. Took message for DER.	5
9/2/11	DER letter to Chris Johnson enclosing Notice of Deposition of Perry Woodside. Copied, mailed, and filed. Updated case tracking sheet.	20
9/6/11	Receipt of Consent to Join from Joel D. Prosser. Scanned, saved to system, emailed to DER, and entered onto spreadsheet of parties joined. Emailed updated spreadsheet to DER.	15
9/6/11	ECF: Receipt of Notice of Joinder for Joel D. Prosser re [1] Complaint [Docket No. 62]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
9/6/11	Receipt of return green card from USPS confirming service on document subpoena sent to Founders Federal Credit Union. Scanned-in, saved to system and e-mailed to DER.	10
9/6/11	Receipt of correspondence from Chris Johnson requesting discovery. Filed same.	5
9/7/11	Receipt of coverletter from Chris Johnson's office along with affidavits of Len Robinson and Patrick Silver. Scanned to system and emailed to DER. Filed same.	5
9/9/11	Receipt of Defendant's Second Request for Production. Scanned and emailed copy to DER. Prepared shells for responses. Filed same.	30
9/12/11	Receipt of multiple emails from Kevin Faile regarding Opt-ins (discovered they were sent in error and that we already had these Opt-ins). Checked status of chart and emailed latest version to Kevin Faile & Louis Roman.	25
9/14/11	DER coverletter to Chris Johnson with deposition notices for Steve Willis, Lisa Robinson, and Jeff Naftal. Miller letter to Bernard Investigations enclosing Naftal deposition notice and check for appearance fee for service of same. Copied, scanned, mailed, and filed same.	25
9/16/11	Telephone call from Chris Johnson for DER. Took message.	5
9/21/11	Telephone call from Chris Johnson about postponing depositions.	5
9/21/11	ECF: Receipt of Text Order granting in part and denying in part [44] Motion for Partial Summary Judgment [Docket No. 63]. Saved to system. Printed out. Updated Order Index and filed. Updated case tracking sheet.	15
9/22/11	DER letter to Chris Johnson with Notice of Deposition for Linda Edwards. Copied, scanned, mailed, and filed same. Updated case tracking sheet.	15

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
9/27/11	ECF: Receipt of Notice of Joinder for James Michael King, Jr. re [1] Complaint. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
9/27/11	Consent to join from James Michael King, Jr. Added to spreadsheet. Scanned-in Consent to and e-mailed to DER. Emailed updated chart to Kevin Faile and DER.	15
9/28/11	Stamped and mailed 43 postcards	60
10/7/11	Receipt of letter from Chris Johnson and documents produced responsive to Plaintiffs' Second Request for Production. Updated case tracking sheet. Filed same.	15
10/11/11	Filed DER letter to Chris Johnson enclosing Plaintiffs' Disclosure of Expert Witnesses along with reports and curriculum vitae.	5
10/11/11	ECF: Receipt of Plaintiff's ID Of Expert Witnesses [Docket No. 67]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet.	15
10/19/11	Receipt of Kevin Faile's errata sheet. Scanned and emailed to DER.	5
10/19/11	Scanned Plaintiffs' 1st Discovery Requests and e-mailed to DER.	5
10/20/11	Filed DER letter to Lyn Allen of Allen Court Reporting enclosing copy of Faile errata sheet.	5
10/20/11	Updated spreadsheet for consents to join and emailed to Kevin Faile & DER.	15
10/20/11	ECF: Receipt of Notice of Joinder for Melissa Pitmon Munn [Docket No. 68]. Saved to system. Printed out. Updated Pleading Index and filed. Updated case tracking sheet. Discovered copy of Opt-In for Munn was not redacted and reported to DER. DER corrected and advised all parties accordingly. Multiple emails with Chris Johnson about having problems with opening corrected document in .pdf format. Corrected ECF received and pleadings were all corrected.	20

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
11/2/11	ECF: Received Defendant's Motion in Limine to Exclude Testimony of Experts [Docket No. 70]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
11/10/11	Receipt of coverletter from Chris Johnson along with Defendant's Expert Report. Filed same.	5
11/11/11	Telephone call from Chris Johnson to DER. Left message.	5
11/14/11	Telephone call from Russell Rogers regarding status of case. Left message for DER.	5
11/16/11	File DER letter to Lyn Allen of Allen Court Reporting enclosing DePalma errata sheet.	5
11/21/11	ECF: Receipt of Plaintiff's Response in Opposition re [70] Motion in Limine to Exclude Testimony of Experts [Docket No. 72]. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
11/28/11	DER correspondence to Chris Johnson regarding settlement discussions. Filed same.	5
11/30/11	ECF: Receipt of Text Order granting [73] Motion for Extension of Time to File Response/Reply re [70] Motion in Limine to Exclude Testimony of Experts [Docket No. 74]. Printed out. Updated Pleadings Index and filed. Updated case tracking sheet.	15
11/30/11	ECF: Receipt of Printed out. Motion for Extension of Time to File Response/Reply as to [70] MOTION in Limine to Exclude Testimony of Experts [Docket No. 73]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
11/30/11	Telephone call from Chris Johnson requesting extension of time for reply brief. Left message for DER.	5
12/6/11	Chappell Hurst (Pickens Co.) called for DER [called twice]. Left message for DER.	10
12/6/11	DER letter to Chris Johnson enclosing Notice of Deposition for Debbie Hardin. Updated case tracking sheet.	10

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
12/6/11	Deposition Notice for Debbie Hardin - scanned, copied and mailed. Emailed copy to DER.	15
12/9/11	Filed DER letter to Dr. Yankow with payment for expert witness fee. Updated case tracking sheet for 12/21/11 mediation date.	5
12/9/11	ECF: Receipt of Defendant's Reply to Response to Motion re [70] MOTION in Limine to Exclude Testimony of Experts [Docket No. 76]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
12/12/11	ECF: Receipt of Joint Motion to Amend/Correct [42] Scheduling Order, Set Deadlines, Terminate Motions [Docket No. 77]. Saved to system. Printed out. Updated Motion Index and filed. Updated case tracking sheet.	15
12/13/11	Receipt of cover letter and discovery requests from Lancaster County. Scanned-in to system, and emailed to DER. Set-up shells for responses and emailed to DER.	30
12/15/11	ECF: Receipt of Text Order denying [70] Motion in Limine [Docket No. 79]. Printed out. Saved to system. Updated Order Index and filed.	15
12/15/11	Received from Allen Court Reporting original depositions: Lisa Robinson Steve Wilis Faile's errata sheet Louis Roman's errata sheet Scott Craton's errata sheet Britt Lineberger Donald Hyatt Sent email to DER letting him know receipt.	10
12/20/11	Telephone call from Dr. Stephen Lockley - took message	5
12/28/11	Receipt of deposition transcript for Dr. Jeffrey Yankow	5

FAILE v. LANCASTER COUNTY
Time - Lorry Miller

DATE	DESCRIPTION	TIME (minutes)
1/3/12	Receipt of updated information for Stacey Chapman. Updated spreadsheet and filed email correspondence pertaining to change. Emailed updated spreadsheet.	10
1/11/12	Updated Joseph Rouse's address on spreadsheet. Emailed updated spreadsheet and filed pertaining email correspondence.	10
1/16/12	Scanned Faile Affidavit and emailed to DER	5
1/16/12	Scanned Settlement Agreement and emailed to DER	5
1/17/12	Receipt of ECF - Consent Motion for Settlement Approval, to Authorize Notice to Class, and to Schedule Fairness Hearing. Saved to system, printed out two copies, updated index and filed. Prepared courtesy copy of Motion for Judge Currie. Prepared mailing and took mail package to Post Office.	90
1/17/12	Telephone call from newspaper reporter (Melissa Lipman). Took message for DER.	5
1/19/12	Receipt of ECF - Supplement by Brian Scott Craton, Alan R DePalma, Kevin Faile, Louis C Roman to [84] Consent Motion for Settlement Approval, to Authorize Notice to Class, and to Schedule Fairness Hearing Supplemental Brief in Support of Consent Motion. Saved to system, printed out cop	15
1/20/12	Receipt of deposition transcript for Linda Edwards.	5
1/17/12	Receipt and review of DER email regarding database and letters that will need to be sent out to parties in the case and instructions for the process. Review of chart of opt-ins for case.	10
1/23/12	Receipt and review of DER email with attached spreadsheet of opt-in payees and figures for letters to be merged [Letter 1].	10
1/23/12	Receipt and review of DER email with attached spreadsheet of people who did not opt-in but will receive a payment (Letter 3).	10
1/23/12	Receipt and review of DER email with attached settlement chart of opt-ins who are not owed money and those will not get a settlement payment (Letter 2 and Letter 4).	10

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DATE	DESCRIPTION	TIME (minutes)
1/23/12	Receipt of email and attachments regarding necessary corrections. Updated/corrected database and double-checked entries.	60
1/24/12	Split out main database chart into 4 databases to correspond with letters. Added figure amounts to recipients of payments.	120
	TOTAL	2135
	MINUTES	
		35.6 hours

Attachment 3

Rothstein Law Firm, PA
Faile Expenses

Date	Payee	Description	Amount	Notes
10/29/2010	US District Court	Filing fee	350.00	Visa
10/31/2010	Thompson West	Westlaw	34.57	
11/16/2010	David E. Rothstein	Mileage: Columbia-Lancaster-Greenville	97.50	195 miles @ \$0.50
11/30/2010	Thompson West	Westlaw	108.58	
2/15/2011	PLCG, Inc.	Copies	230.36	1093
2/16/2011	David E. Rothstein	Mileage: Greenville-Ft. Mill r/t	127.50	250 miles @ \$0.51
2/16/2011	David E. Rothstein	Meals	6.41	
3/18/2011	PLCG, Inc.	Copies	119.95	1114
6/16/2011	David E. Rothstein	Mileage: Greenville-Ft. Mill r/t	127.50	250 miles @ \$0.51
6/20/2011	Wingate Inn	Mediation Room	118.77	AmEx
6/20/2011	David E. Rothstein	Mileage: Greenville-Rock Hill r/t	102.00	200 miles @ \$0.51
6/30/2011	Kelly Wessel	Forensic auditing services	892.35	1132
6/30/2011	Thompson West	Westlaw	325.88	
7/12/2011	Rothstein Law Firm	Reimburse for half of mediation room	(59.38)	1572 Gignilliat firm
7/15/2011	Gaffney Lewis & Edwards	Mediation expenses	1,023.75	1135
7/25/2011	Bernard Investigations, LLC	Service on Donald Hyatt	75.00	1228
7/31/2011	Thompson West	Westlaw	196.28	
8/1/2011	Bernard Investigations, LLC	Service on Lanny Bernard	85.00	1229
8/3/2011	PLCG, Inc.	Courtesy copies of brief	49.34	
8/3/2011	Kelly Wessel	Forensic auditing services	1,509.75	1143
8/8/2011	Britt Lineberger	Deposition appearance fee	40.00	1146
8/15/2011	Kelly Wessel	Forensic auditing services	600.00	1150
8/17/2011	Big View Diner	Meals	25.64	AmEx
8/17/2011	David E. Rothstein	Mileage: Greenville-Columbia-Rock Hill	183.15	330 miles @ \$0.555
8/18/2011	Wingate Inn	Lodging	98.79	AmEx
8/18/2011	David E. Rothstein	Mileage: Rock Hill-Greenville	55.50	100 miles @ \$0.555
8/22/2011	Longhorn	Meals	35.18	AmEx
8/23/2011	David E. Rothstein	Mileage: Greenville-Rock Hill r/t	127.65	230 miles @ \$0.555
8/23/2011	David E. Rothstein	Meals	6.18	Cash
8/23/2011	Rock Hill Grill	Meals	45.10	AmEx
8/24/2011	Jersey Mike's	Meals	29.56	Visa
8/24/2011	David E. Rothstein	Meals	17.93	Cash
8/25/2011	Jersey Mike's	Meals	27.82	Visa
8/25/2011	Wingate Inn	Lodging	296.37	AmEx
8/25/2011	Rinehart Realty Corp.	Deposition space	135.00	1148
8/31/2011	Thompson West	Westlaw	145.31	
9/4/2011	PLCG, Inc.	Copies	19.08	1244
9/6/2011	USPS	Mailing brief	14.50	AmEx
9/7/2011	Rothstein Law Firm	Reimburse for half of deposition space	(67.50)	1683 Gignilliat firm
9/14/2011	Jeffrey Naftal	Deposition appearance fee	45.10	1155
9/14/2011	Founders Credit Union	Subpoena--documents	472.75	1251
9/15/2011	David E. Rothstein	Meals (Panera)	1.73	Cash
9/15/2011	David E. Rothstein	Mileage: Greenville-Rock Hill-Chester	122.10	220 miles @ \$0.555
9/15/2011	David E. Rothstein	Meals	7.36	Cash
9/25/2011	Allen Court Reporting	Depositions (Roman, Faile, Craton, Bernard, DePalma, Hyatt)	3,090.70	1250
9/26/2011	Bernard Investigations, LLC	Service on Jeffrey Naftal	75.00	1184
9/28/2011	Staples	Postcards	21.99	
9/30/2011	David E. Rothstein	Mileage: Greenville-Columbia r/t	122.10	220 miles @ \$0.555
9/30/2011	Thompson West	Westlaw	340.79	
10/4/2011	David E. Rothstein	Mileage: Greenville-Lancaster r/t	127.65	230 miles @ \$0.555
10/4/2011	David E. Rothstein	Meals	4.20	
10/4/2011	Jomars Family Rest.	Meals	22.95	Visa
10/5/2011	David E. Rothstein	Mileage: Greenville-Lancaster r/t	127.65	230 miles @ \$0.555
10/5/2011	Lancaster Mexican Rest.	Meals	19.18	Visa
10/5/2011	Allen Court Reporting	Lineberger Deposition	416.15	1182
10/14/2011	Garber Reporting Service	Deposition of Linda Edwards	361.35	

Date	Payee	Description	Amount	Notes
10/15/2011	Kelly Wessel	Forensic auditing services	146.25	
10/21/2011	Allen Court Reporting	Deposition of Steve Willis	591.65	1178
10/31/2011	Allen Court Reporting	Depositions of Lisa Robinson and Jeff Naftal	792.05	1179
11/25/2011	David E. Rothstein	Mileage: Greenville-Ft. Mill r/t	138.75	250 miles @ \$0.555
11/30/2011	Thompson West	Westlaw	36.02	
12/7/2011	David E. Rothstein	Mileage: Greenville-Columbia r/t	122.10	220 miles @ \$0.555
12/8/2011	Jeff Yankow, Ph.D.	Expert witness fees	13,300.00	
	Steve Lockley	Expert witness fees	5,200.00	
	Allen Court Reporting	Expert depositions (Woodside, Yankow)	1,163.60	
12/21/2011	David E. Rothstein	Mileage: Greenville-Columbia r/t	122.10	220 miles @ \$0.555
12/21/2011	David E. Rothstein	Meals	12.05	
12/31/2011	Thompson West	Westlaw	82.33	
	Rothstein Law Firm	Postage	97.86	
	Rothstein Law Firm	Copies	363.60	
1/11/2012	Rothstein Law Firm	Mileage	122.10	220 miles @ \$0.555
1/11/2012	Rothstein Law Firm	Meals	9.56	
1/24/2012	Thompson West	Westlaw	340.47	
		Mileage: Greenville-Columbia r/t (anticipated for fairness hearing)	122.10	220 miles @ \$0.555
3/8/2012	David E. Rothstein		35,497.71	
		To Be Paid by Lancaster County	(1,083.14)	Mediation expenses
			34,414.57	