

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELE A. LEAHY,

Plaintiff,

v.

GARCES RESTAURANT GROUP LLC, *et al*

Defendants.

CIVIL ACTION
NO. 17-00968

PAPPERT, J.

May 17, 2018

MEMORANDUM

Michele Leahy, represented by Disability Rights Pennsylvania, sued Garces Restaurant Group, LLC, 2401 Walnut Café, LLC, 2401 Walnut, LP, and Bedrock Group, Inc. for violations of the American with Disabilities Act. (Compl., ECF No. 1.) The parties resolved the litigation via a Consent Decree which the Court approved on October 25, 2017. They were unable, however, to agree on the amount of reasonable attorneys' fees owed to Leahy's lawyers under the ADA's fee shifting provision.¹ (Consent Decree, ECF No. 39.) Defendants acknowledge that Leahy is the prevailing party and that the hourly rates for Leahy's attorneys are reasonable, but contend that the number of hours DRP attorneys worked on the case were excessive. DRP filed its Motion for Attorneys' Fees (Mot., ECF No. 43), to which the Defendants objected (Def. Resp. in Opp., ECF No. 44) and DRP replied (ECF No. 46). After reviewing the Motion,

¹ Under ¶ 8.1 of the Consent Decree, only 2401 Walnut Café, LLC, 2401 Walnut, LP, and Bedrock Group, Inc. (collectively "Defendants"), not Garces Restaurant Group, LLC, are responsible for the fees, expenses, and costs.

Response, Reply and all time sheets provided by DRP, the Court grants the Motion in part and denies it in part for the reasons explained below.

I

In the fall of 2016, Leahy learned that a new restaurant, 24 Wood Fired Fare, would be opening at 24th and Walnut Streets in Philadelphia. (Compl. ¶ 21.) Leahy uses a wheelchair for mobility and often dines out for personal and professional reasons. (*Id.* ¶¶ 11, 18-19.) She was concerned about the restaurant’s accessibility and contacted DRP. (*Id.* ¶¶ 21-22.) DRP is a non-profit corporation “designated as the federally-mandated protection and advocacy agency in Pennsylvania.” *Who We Are*, Disability Rights Pennsylvania, <https://www.disabilityrightspa.org/who-we-are/> (last visited May 12, 2018). Specifically, DRP protects and advances the rights of people with disabilities, including litigating ADA compliance issues. *Id.*

DRP attorneys sent the Defendants a September 26, 2016 letter describing the various ADA compliance issues that were visible from outside the restaurant. (Mot., Ex. A (“Haubert Declaration”) ¶ 3.) In response, Charles Block, a representative of the 2401 Defendants, contacted DRP attorney Dynah Haubert in early October 2016. (*Id.* ¶ 4.) Haubert sent Block a list of questions concerning the restaurant’s accessibility and Block invited DRP to tour the restaurant and make suggestions that would address DRP’s concerns. (*Id.* ¶ 5.) Haubert and Jamie Ray-Leonetti, another DRP attorney, visited the restaurant on October 21, 2016 and identified issues concerning the entryway on Walnut Street, signage, and the entrance at 24th and Sansom Streets. (*Id.* ¶ 6.) Over the next few months, the parties attempted to resolve the ADA

compliance concerns but were unable to do so and DRP filed a one-count Complaint on Leahy's behalf on March 2, 2017. (ECF No. 1.)

In her Complaint, Leahy asserted that the restaurant violated the ADA because it lacked adequate ramps from the Walnut Street sidewalk to the patio and from the sidewalk to the Sansom Street entrance. She also alleged that there were not enough accessible parking spaces in the nearby parking lot. (Compl. ¶¶ 62-63, 72.) After several stipulations between the parties to extend the Defendants' time to respond to the Complaint, the Court ordered the Defendants to respond and the parties to exchange Rule 26(f) disclosures on or before May 26, 2017. (May 5 Order, ECF No. 16.) The Court referred the case to Magistrate Judge Elizabeth T. Hey for settlement discussions (Scheduling Order, ECF No. 24) and the parties participated in settlement conferences with Judge Hey on June 29, July 7, July 31, August 23, September 28 and October 13 (Minute Entries, ECF Nos. 25, 27, 30, 33, 35, 37).

The negotiations eventually resulted in the twelve-page Consent Decree pursuant to which the Defendants agreed to make the modifications necessary to ensure the restaurant's accessibility under the ADA. The modifications include the construction of a ramp from the sidewalk to the Walnut Street patio, ongoing maintenance of the Sansom Street ramp, the designation of accessible parking spots and the adjustment of bathroom doors to require less than five pounds of force to open. (Consent Decree ¶¶ 3-5.)

During a telephone conference on October 17, 2017 with the Court, the parties stated that they were "far apart" in their attorneys' fees negotiations. The Court conducted a subsequent telephone conference on December 18, 2017 where the parties

informed the Court that they were still unable to resolve the matter without Court intervention. Plaintiff's attorneys then filed this Motion.

II

The ADA provides that a court may allow the prevailing party to recover “a reasonable attorney’s fee, including litigation expenses, and costs.” 42 U.S.C. § 12205. A plaintiff is a “prevailing party” if “they succeed on any significant issue in litigation which achieves some of the benefit the [party] sought in bringing suit.” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). In statutory fee shifting cases, the party seeking fees has the burden to prove its request is reasonable and can meet its burden by submitting “evidence supporting the hours worked and the rates claimed.” *Rode v. Dellarciprete*, 892 F.2d 1177, 1183 (3d Cir. 1990). The Court multiplies the hourly rate by the number of hours to obtain the lodestar, which is presumed to be the reasonable fee, *id.*, and the Court “may not award less in fees than requested unless the opposing party makes specific objections to the fee request,” *United States v. Eleven Vehicles, Their Equipment and Accessories*, 200 F.3d 203, 212 (3d Cir. 2000).

The party opposing the fee award “has the burden to challenge, by affidavit or brief with sufficient specificity to give fee applicants notice, the reasonableness of the requested fee.” *Rode*, 892 F.2d at 1183. The party does not need to challenge specific time entries but must “identify the type of work being challenged” and “specifically state [the] grounds for contending that the hours claimed in that area are unreasonable.” *Bell v. United Princeton Properties, Inc.*, 884 F.2d 713, 720 (3d Cir. 1989). “Hours are not reasonably expended if they are excessive, redundant, or otherwise unnecessary.” *Rode*, 892 F.2d at 1183. Although the Court cannot decrease

the fee award based on factors not raised by the adverse party, it has “a great deal of discretion in deciding what a reasonable fee award is, so long as the reduction is based on objections actually raised by the adverse party.” *Bell*, 884 F.2d at 721. In light of objections, the Court “will inevitably be required to engage in a fair amount of judgment calling based upon its experience with the case and its general experience as to how much time a case requires.” *Id.*

III

A

DRP submitted time sheets indicating the amount of time spent on each task throughout the litigation. DRP seeks \$53,138 for 216.5 hours of work and \$1,245 for litigation expenses and costs. Again, there is no dispute that Leahy is a “prevailing party” and the Defendants do not object to the litigation expenses and costs or the hourly rates charged.² While the Defendants take issue with virtually all aspects of DRP’s bills, the Court can address only those fees to which the Defendants have objected with the requisite specificity.

As often happens, the parties blame each other in a number of ways for the protracted nature of the dispute. Defendants first contend that the fees should be reduced because they only paid their lawyers \$10,470 to resolve the case. (Def. Resp. in Opp. at 7.) Their attorneys’ decision to work fewer hours (or charge their clients for less time than they worked) does not in and of itself make the amount of time that DRP lawyers spent unreasonable. *See Harlan v. NRA Grp., LLC*, No. 10-0324, 2011 WL

² The attorneys’ rates per hour are as follows: Shanon Levin (\$355), Kelly Darr (\$355), Jamie Ray-Leonetti (\$335), Rocco Iacullo (\$305), Dynah Haubert (\$200). (Mot., at 8.)

813961, at *1 (E.D. Pa. Mar. 2, 2011). Further, this objection does not identify the type of work being challenged.

They next contend that the hours overall are unreasonable because DRP should not have filed a Complaint, something Defendants contend was unnecessary. (Def. Resp. in Opp. at 3, 8.) Although the parties worked to resolve Leahy's concerns both before and after she filed the Complaint, the pleading was certainly not frivolous. Defendants agreed to make certain modifications that were specified in the Complaint and prior negotiations certainly do not foreclose a plaintiff's right to file a Complaint.

B

Defendants also object to the amount of time spent on discovery related work. (Def. Resp. in Opp. at 8, 11 n.8.) DRP served requests for admission, interrogatories, and document requests to all Defendants. *See* (Appendix A). Defendants contend that much of the discovery was unnecessary because most of it "related to matters not in dispute." (Def. Resp. in Opp. at 9.) They argue further that the amount of time spent was "absurdly excessive" since there were no motions filed, no depositions taken, and they did not serve any discovery requests on Leahy. (*Id.* at 11 n.8, 8.) While Defendants contend that DRP spent 103 hours on discovery related work (*id.* at 11 n.8), DRP claims it spent 34.2 hours on those tasks (Reply, at 4). The Court reviewed the time sheets DRP submitted and attributes 45.3 hours to discovery. *See* (Appendix A).

The Complaint and Consent Decree demonstrate that the necessary modifications to the restaurant were seemingly obvious and few in number. Time expended drafting a "discovery plan" was excessive and the Court reduces that time

from 3.3 to 2.1 hours. (Entries 116, 145).³ DRP attorneys seek payment for 8.1 hours of work on the Rule 26(f) report, preparing for the Rule 16 conference, and conferring with each other about the conference, an excessive amount of time which the Court reduces by 2.6 hours. The lawyers also charge an excessive amount of time for drafting and revising discovery requests; the case was small in scope and the parties were at all relevant times actively negotiating a resolution. The Court reduces that time by 12.7 hours. (Entries 183-189.) Defendants correctly point out that there was not much “of real substance” that took place after the Complaint was filed. Defendants propounded no discovery, there were no depositions taken or motions filed, and the dispute was very narrow in scope. The Court accordingly reduces the total amount of time spent on discovery related work by 18.6 hours. *See* (Appendix A).

C

In their fourth objection, Defendants contend that DRP spent an excessive amount of time working on the Complaint. (Def. Resp. in Opp. at 11 n.8.) Defendants assert that DRP spent 64.8 hours on such work (*id.*) while DRP contends that it seeks payment for 29.8 hours (Reply, at 4). The Court concludes that DRP spent 41.2 hours on Complaint related work. *See* (Appendix A). This includes time spent researching and visiting the restaurant and drafting and editing the Complaint.

Defendants object to the excessive time spent on such work since the case is a simple one. (Def. Resp. in Opp. at 11 n.8.) Leahy’s Complaint asserts one count under the ADA contending that a restaurant was not accessible to those like her who need a wheelchair for mobility. While such concerns are undoubtedly important, the nature of this dispute was far from complex. DRP is designated as the federally-mandated

³ All entries are listed on Appendix A.

protection advocacy program in Pennsylvania and it routinely litigates ADA compliance issues. Further, the barriers at the restaurant were minimal. The Court reduces the amount of time spent drafting the Complaint from 10.8 to 4.0 hours (Entries 39, 45, 47, 51) and the amount of time spent editing the pleading from 11 to 3 hours (Entries 52-55, 57, 59, 60). In sum, the Court reduces the total amount of Complaint related work by 16.6 hours. *See* (Appendix A).

IV

The Court reduces those aspects of DRP's request to which the Defendants objected by 35.2 hours and approves 181.3 hours of time reasonably spent on the case for a total \$43,203 in attorneys' fees and \$1,245 in costs.

An appropriate Order follows.

BY THE COURT:

/s/ Gerald J. Pappert
GERALD J. PAPPERT, J.

Appendix A - Reasonable Attorneys' Fees								
Entry	Date	Provided By	Description	Hours Claimed	Hours Revised	Rate	Subtotal	Category
1	9/16/2016	Dynah Haubert	Research and draft letter to Garces Group re: ADA violations at 2401 Walnut	2.4	2.4	\$ 200	\$ 480.00	Complaint
2	9/19/2016	Dynah Haubert	Research and draft letter to Garces Group re: ADA violations at 2401 Walnut	1.2	1.2	\$ 200	\$ 240.00	Complaint
3	9/19/2016	Jamie Ray-Leonetti	research on restaurant	0.5	0.5	\$ 335	\$ 167.50	Complaint
4	9/20/2016	Dynah Haubert	Research and draft letter to Garces Group re: ADA violations at 2401 Walnut	1.1	1.1	\$ 200	\$ 220.00	Complaint
5	9/20/2016	Jamie Ray-Leonetti	review and revise Garces letter	0.5	0.5	\$ 335	\$ 167.50	
6	9/21/2016	Dynah Haubert	Edit letter to Garces Group re: ADA violations at 2401 Walnut	0.5	0.5	\$ 200	\$ 100.00	
7	9/21/2016	Dynah Haubert	Discussion with JRL on letter	0.3	0.3	\$ 200	\$ 60.00	
8	9/21/2016	Jamie Ray-Leonetti	discussion with Dynah on letter	0.3	0.3	\$ 335	\$ 100.50	
9	9/21/2016	Jamie Ray-Leonetti	discussion with Rocco on letter	0.2	0.2	\$ 335	\$ 67.00	
10	9/21/2016	Rocco Iacullo	Discussion with JRL on letter	0.2	0.2	\$ 305	\$ 61.00	
11	9/22/2016	Dynah Haubert	Final edits to letter re ADA violations at 2401	0.7	0.7	\$ 200	\$ 140.00	
12	10/4/2016	Dynah Haubert	TC w/ Charles Block from 2401 Walnut re: restaurant entrance	0.2	0.2	\$ 200	\$ 40.00	Complaint
13	10/6/2016	Jamie Ray-Leonetti	meet with KD about Garces follow up	0.5	0.5	\$ 335	\$ 167.50	Complaint
14	10/6/2016	Kelly Darr	Meet with JRL re Garces next steps	0.5	0.5	\$ 355	\$ 177.50	
15	10/6/2016	Jamie Ray-Leonetti	TC with building owner about plans	0.3	0.3	\$ 335	\$ 100.50	Complaint
16	10/11/2016	Jamie Ray-Leonetti	emails with building owner about plans	0.2	0.2	\$ 335	\$ 67.00	Complaint
17	10/18/2016	Jamie Ray-Leonetti	internet research re: Garces, 2401	1	1	\$ 335	\$ 335.00	Complaint
18	10/19/2016	Jamie Ray-Leonetti	mtg with KD and DH re site visit	0.5	0.5	\$ 335	\$ 167.50	
19	10/19/2016	Kelly Darr	Meet w/ JRL & DH re site visit	0.5	0.5	\$ 355	\$ 177.50	
20	10/19/2016	Dynah Haubert	Meet w/ KD & JRL re site visit (.5); meet w/ JRL re same (.5)	1	1	\$ 200	\$ 200.00	
21	10/19/2016	Jamie Ray-Leonetti	call with C Block and follow up with DH for site visit	1	1	\$ 335	\$ 335.00	
22	10/20/2016	Dynah Haubert	Drafted checklist for site visit to 2401 Walnut	0.9	0.9	\$ 200	\$ 180.00	
23	10/21/2016	Dynah Haubert	Visited 24 (.6 travel to 24; .7 conduct site visit/meet with Rob Esplen and mgr Natasha); .3 travel back from 24)	1.6	1.6	\$ 200	\$ 320.00	Complaint
24	10/21/2016	Dynah Haubert	Wrote up notes from visit to 24	1.4	1.4	\$ 200	\$ 280.00	Complaint
25	10/26/2016	Dynah Haubert	Review Jamie's additions to site visit notes	0.2	0.2	\$ 200	\$ 40.00	
26	10/28/2016	Dynah Haubert	Met with legal director to discuss site visit and next steps	0.5	0.5	\$ 200	\$ 100.00	
27	10/28/2016	Kelly Darr	Meet w/ DH re site visit, next steps	0.5	0.5	\$ 355	\$ 177.50	
28	11/1/2016	Dynah Haubert	Reviewed correspondence to prep for call to C. Block; LVM for him	0.2	0.2	\$ 200	\$ 40.00	
29	11/1/2016	Dynah Haubert	Emailed JRL about C. Block's ? about signage	0.2	0.2	\$ 200	\$ 40.00	
30	11/2/2016	Dynah Haubert	Researched ADA's signage requirements and drafted reply to C. Block re same	1.2	1.2	\$ 200	\$ 240.00	Complaint
31	11/3/2016	Dynah Haubert	Meeting with JRL re site visit followup	0.5	0.5	\$ 200	\$ 100.00	
32	11/3/2016	Jamie Ray-Leonetti	mtg with Dynah re follow up from site visit	0.5	0.5	\$ 335	\$ 167.50	
33	11/4/2016	Dynah Haubert	Met with JRL to discuss response to R. Esplen email	0.2	0.2	\$ 200	\$ 40.00	
34	11/4/2016	Jamie Ray-Leonetti	Met with DH to discuss response to R. Esplen email	0.2	0.2	\$ 335	\$ 67.00	
35	11/7/2016	Dynah Haubert	Met w/ client and JRL & discussed next steps	1	1	\$ 200	\$ 200.00	
36	11/7/2016	Jamie Ray-Leonetti	mtg with Dynah and client	1	1	\$ 335	\$ 335.00	
37	11/22/2016	Dynah Haubert	TC w/ M. Leahy re: her visit to 24	0.4	0.4	\$ 200	\$ 80.00	Complaint
38	11/22/2016	Jamie Ray-Leonetti	phone call with client re: her visit to 24	0.4	0	\$ 335	\$ -	Complaint
39	12/2/2016	Jamie Ray-Leonetti	draft portions of complaint	2	0	\$ 335	\$ -	Complaint
40	12/6/2016	Dynah Haubert	Drafted complaint	0.6	0.6	\$ 200	\$ 120.00	Complaint

41	12/7/2016	Dynah Haubert	Drafted complaint	2.9	2.9	\$ 200	\$ 580.00	Complaint
42	12/13/2016	Jamie Ray-Leonetti	T/C with client	0.3	0.3	\$ 335	\$ 100.50	
43	12/14/2016	Jamie Ray-Leonetti	Research - new construction claims	1	1	\$ 335	\$ 335.00	Complaint
44	12/16/2016	Dynah Haubert	Drafted claims section of complaint	0.5	0.5	\$ 200	\$ 100.00	Complaint
45	1/9/2017	Dynah Haubert	Drafted sections of complaint	0.8	0	\$ 200	\$ -	Complaint
46	1/9/2017	Dynah Haubert	Researched identities of proper defendants	0.9	0.9	\$ 200	\$ 180.00	Complaint
47	1/24/2017	Jamie Ray-Leonetti	drafting complaint	2	0	\$ 335	\$ -	Complaint
48	1/25/2017	Dynah Haubert	Discussion with JRL re: existing alteration	0.4	0.4	\$ 200	\$ 80.00	Complaint
49	1/25/2017	Jamie Ray-Leonetti	discussion with Dynah- existing alteration	0.4	0	\$ 335	\$ -	Complaint
50	1/25/2017	Jamie Ray-Leonetti	Dynah - emails	0.2	0.2	\$ 335	\$ 67.00	
51	1/26/2017	Jamie Ray-Leonetti	complaint - draft and revise facts	2	0	\$ 335	\$ -	Complaint
52	1/30/2017	Dynah Haubert	Edit complaint	3	2	\$ 200	\$ 400.00	Complaint
53	1/31/2017	Jamie Ray-Leonetti	Garces complaint	3	0	\$ 335	\$ -	Complaint
54	2/2/2017	Dynah Haubert	Edited complaint	1.3	0	\$ 200	\$ -	Complaint
55	2/3/2017	Jamie Ray-Leonetti	revisions to complaint	2	1	\$ 335	\$ 335.00	Complaint
56	2/10/2017	Jamie Ray-Leonetti	meet with Kelly re- complaint	1	1	\$ 335	\$ 335.00	Complaint
57	2/10/2017	Kelly Darr	Meet with JRL re: complaint	1	0	\$ 355	\$ -	Complaint
58	2/14/2017	Jamie Ray-Leonetti	T/C with client	0.5	0.5	\$ 335	\$ 167.50	
59	2/27/2017	Kelly Darr	Review and revise complaint	0.7	0	\$ 355	\$ -	Complaint
60	3/1/2017	Jamie Ray-Leonetti	edit and review complaint with cl	1	0	\$ 335	\$ -	Complaint
61	3/1/2017	Jamie Ray-Leonetti	prep complaint to file	0.5	0.5	\$ 335	\$ 167.50	Complaint
62	3/2/2017	Jamie Ray-Leonetti	additional cover sheets etc. to file	0.3	0.3	\$ 335	\$ 100.50	Complaint
63	3/6/2017	Jamie Ray-Leonetti	issues regarding service of process with JA	1	1	\$ 335	\$ 335.00	Complaint
64	3/7/2017	Jamie Ray-Leonetti	call with client - update	0.4	0.4	\$ 335	\$ 134.00	
65	3/8/2017	Shanon Levin	Review file	1	1	\$ 355	\$ 355.00	
66	3/9/2017	Dynah Haubert	File and task review meeting with S. Levin	0.5	0.5	\$ 200	\$ 100.00	
67	3/9/2017	Shanon Levin	File and task review; meet w/ Dhaubert	0.5	0.5	\$ 355	\$ 177.50	
68	3/15/2017	Dynah Haubert	Reviewed Judge Pappert's procedures	0.5	0.5	\$ 200	\$ 100.00	
69	3/15/2017	Dynah Haubert	TC to client (w/ SL) re: change in representation, next steps	0.3	0.3	\$ 200	\$ 60.00	
70	3/15/2017	Dynah Haubert	TC w/ SL re: setting up next meeting w/ client, retainer agreement	0.1	0.1	\$ 200	\$ 20.00	
71	3/15/2017	Dynah Haubert	TCs with adjuster N Gargano re: coverage, earliest date client addressed the issue	0.3	0.3	\$ 200	\$ 60.00	
72	3/15/2017	Shanon Levin	T/c w/ client and meet with DHaubert re same	0.4	0.4	\$ 355	\$ 142.00	
73	3/16/2017	Dynah Haubert	Left VM and emailed C. Block; conferred w/ SL re same	0.2	0.2	\$ 200	\$ 40.00	
74	3/16/2017	Shanon Levin	Confer w/ DH re C Block	0.1	0.1	\$ 355	\$ 35.50	
75	3/17/2017	Dynah Haubert	TC w/ C. Block re settlement possibilities (ramp to patio)	0.6	0.6	\$ 200	\$ 120.00	
76	3/17/2017	Dynah Haubert	Conferred w/ SL re C. Block TC, response	0.4	0.4	\$ 200	\$ 80.00	
77	3/17/2017	Dynah Haubert	Emailed client re: retainer and setting up teleconference	0.2	0.2	\$ 200	\$ 40.00	
78	3/17/2017	Shanon Levin	Review complaint (.1); research (.1); meet w/ DHaubert re t/c from Defendant and next steps (.4)	0.6	0.6	\$ 355	\$ 213.00	
79	3/21/2017	Dynah Haubert	TC w/ C. Block re settlement possibilities (required architectural mods, atty fees) and ext of time to answer	0.4	0.4	\$ 200	\$ 80.00	
80	3/21/2017	Dynah Haubert	Emailed client re: retainer and teleconference	0.1	0.1	\$ 200	\$ 20.00	
81	3/21/2017	Dynah Haubert	Drafted list of all steps necessary for full relief	1	1	\$ 200	\$ 200.00	
82	3/21/2017	Dynah Haubert	Review entries of appearance and fwd to docket filing	0.1	0.1	\$ 200	\$ 20.00	
83	3/21/2017	Dynah Haubert	Confer W/ SL re TC w/ C. Block and relief list	0.2	0.2	\$ 200	\$ 40.00	
84	3/21/2017	Dynah Haubert	Update retainer and email same to client for signature	0.4	0.4	\$ 200	\$ 80.00	
85	3/21/2017	Shanon Levin	Meet w/ DHaubert re settlement possibility	0.2	0.2	\$ 355	\$ 71.00	

86	3/22/2017	Dynah Haubert	Confer w/ admin staff re: service addresses of unrepresented defendants; email SL re same	0.5	0.5	\$ 200	\$ 100.00	Complaint
87	3/22/2017	Dynah Haubert	Draft and edit full relief list; send same to SL	0.8	0.8	\$ 200	\$ 160.00	
88	3/22/2017	Dynah Haubert	TC w/ A. Goldstein re Garces Restaurant Group	0.1	0.1	\$ 200	\$ 20.00	
89	3/22/2017	Dynah Haubert	Confer with S. Levin and R. Iacullo re obligation of Garces RG under Title III	0.2	0.2	\$ 200	\$ 40.00	
90	3/22/2017	Rocco Iacullo	confer w/ SL and DH re Garces RG Title III oblig.	0.2	0.2	\$ 305	\$ 61.00	
91	3/22/2017	Dynah Haubert	Confer w/ SL re defense counsel TCs	0.2	0.2	\$ 200	\$ 40.00	
92	3/22/2017	Shanon Levin	Meet w/ DHaubert re calls from defense counsel	0.2	0.2	\$ 355	\$ 71.00	
93	3/22/2017	Shanon Levin	Meet w/ DHaubert and Rlacullo re dismissal of parties/re obligation of Garces RG under Title III	0.2	0.2	\$ 355	\$ 71.00	
94	3/23/2017	Dynah Haubert	Emailed with J. Kinkopf re: Stipulation to extend time to respond and setting up teleconference	0.3	0.3	\$ 200	\$ 60.00	
95	3/23/2017	Dynah Haubert	Emailed with P. Buchanan re: Stipulation to extend time to respond	0.1	0.1	\$ 200	\$ 20.00	
96	3/23/2017	Shanon Levin	Review filings and correspondence; review photos of ADA violations	0.8	0.8	\$ 355	\$ 284.00	Discovery Related
97	3/24/2017	Dynah Haubert	Review defendants' disclosure statements and send to docket filing	0.1	0	\$ 200	\$ -	Discovery Related
98	3/24/2017	Dynah Haubert	TC w/J.Kinkopf re resolution possibilities (.2); email & confer w/ S. Levin re same (.5)	0.7	0.7	\$ 200	\$ 140.00	
99	3/24/2017	Shanon Levin	Emails w/ DHaubert re settlement and meet w/ DHaubert re same	0.5	0.5	\$ 355	\$ 177.50	
100	3/28/2017	Dynah Haubert	Review Judge's procedure re Rule 26 f meeting and email counsel to schedule same	0.5	0.5	\$ 200	\$ 100.00	Discovery Related
101	3/28/2017	Dynah Haubert	Emailed w/ J. Kinkopf to arrange teleconference re: possibilities for settlement	0.1	0.1	\$ 200	\$ 20.00	
102	3/28/2017	Dynah Haubert	Discussion w/ SLevin re Rule 26(f) and settlement	0.2	0	\$ 200	\$ -	Discovery Related
103	3/28/2017	Shanon Levin	Discussions w/ DHaubert re Rule 26(f) and settlement	0.2	0	\$ 355	\$ -	Discovery Related
104	3/29/2017	Shanon Levin	Review and discuss settlement offer; research re prevailing party	1.4	1.4	\$ 355	\$ 497.00	
105	3/30/2017	Dynah Haubert	Confer w/S. Levin re next steps; strategy	0.2	0.2	\$ 200	\$ 40.00	
106	3/30/2017	Shanon Levin	Meet w/ DHaubert re settlement strategy	0.2	0.2	\$ 355	\$ 71.00	
107	4/3/2017	Dynah Haubert	Review parking lot plan provided by C. Block to determine ADA compliance/info needed	0.9	0.9	\$ 200	\$ 180.00	Discovery Related
108	4/3/2017	Dynah Haubert	Review ramp plan provided by C. Block to determine ADA compliance/info needed	1.2	1.2	\$ 200	\$ 240.00	Discovery Related
109	4/3/2017	Dynah Haubert	TC re settlement incl. arch. barriers w/ J. Kinkopf & C. Block (.6); confer w/ SL re same (.4)	1	1	\$ 200	\$ 200.00	
110	4/3/2017	Dynah Haubert	Research & draft confirming email (incl. detail re each arch. barrier) to J. Kinkopf	1.3	1.3	\$ 200	\$ 260.00	
111	4/3/2017	Shanon Levin	Meet w/ DHaubert re settlement and t/c w/ counsel re same	1	1	\$ 355	\$ 355.00	
112	4/3/2017	Shanon Levin	Review emails to counsel re summary	0.2	0.2	\$ 355	\$ 71.00	
113	4/4/2017	Shanon Levin	Rule 26(f) prep	0.3	0	\$ 355	\$ -	Discovery Related
114	4/5/2017	Dynah Haubert	Review Rule 26f; Judge's procedures; and local rules in prep for meeting w/ S. Levin re: Rule 26f conference	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
115	4/5/2017	Dynah Haubert	Meet w/ S. Levin to prep for Rule 26f conference	0.3	0	\$ 200	\$ -	Discovery Related
116	4/5/2017	Dynah Haubert	Draft discovery outline incl. subject areas for document requests	1.2	0	\$ 200	\$ -	Discovery Related
117	4/6/2017	Dynah Haubert	Review & respond to emails among counsel re rescheduling 26f meeting	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
118	4/6/2017	Shanon Levin	Review discovery plan and emails re same	0.9	0	\$ 355	\$ -	Discovery Related
119	4/11/2017	Dynah Haubert	Review updated ramp plans for ADA compliance and draft email to J. Kinkopf re: same	2	2	\$ 200	\$ 400.00	Discovery Related
120	4/11/2017	Dynah Haubert	Confer w/ R. Iacullo re: settlement possibilities, ramp plans	0.3	0.3	\$ 200	\$ 60.00	
121	4/11/2017	Dynah Haubert	Email w/ J. Kinkopf re: scheduling 26f	0.3	0.3	\$ 200	\$ 60.00	Discovery Related

122	4/11/2017	Rocco Iacullo	Confer w/ D. Haubert re: settlement possibilities, ramp plans	0.3	0.3	\$ 305	\$ 91.50	
123	4/12/2017	Dynah Haubert	Email w/ M. Leahy re retainer and to arrange TC	0.1	0.1	\$ 200	\$ 20.00	
124	4/13/2017	Dynah Haubert	TC w/ M. Leahy re case updates (.4); notes re same (.2)	0.6	0.6	\$ 200	\$ 120.00	
125	4/17/2017	Dynah Haubert	Email w/ M. Leahy re retainer; file same	0.2	0.2	\$ 200	\$ 40.00	
126	4/18/2017	Dynah Haubert	Email w/ counsel re scheduling 26(f)	0.1	0.1	\$ 200	\$ 20.00	Discovery Related
127	4/18/2017	Dynah Haubert	Review docs and info from J. Kinkopf re Walnut St. ramp(-.2); confer w S. Levin re: same	0.4	0.4	\$ 200	\$ 80.00	Discovery Related
128	4/18/2017	Shanon Levin	Confer w/ DH re info from counsel re Walnut St. ramp	0.2	0.2	\$ 355	\$ 71.00	
129	4/19/2017	Dynah Haubert	Review info from J. Kinkopf re Walnut St. ramp, other architectural barriers for ADA compliance	1.3	1.3	\$ 200	\$ 260.00	
130	4/20/2017	Dynah Haubert	Calculate updated time & attorneys fees	0.3	0.3	\$ 200	\$ 60.00	
131	4/20/2017	Dynah Haubert	Review parking lot plans and photos sent by J. Kinkopf for ADA compliance (.3); conference w/ R. Iacullo re: same (.9)	1.1	1.1	\$ 200	\$ 220.00	Discovery Related
132	4/20/2017	Rocco Iacullo	Confer w/ DH re parking lot compliance	0.8	0.8	\$ 305	\$ 244.00	
133	4/20/2017	Dynah Haubert	Rule 26(f)/ settlement teleconference	1	1	\$ 200	\$ 200.00	Discovery Related
134	4/20/2017	Dynah Haubert	Meet w/ SLevin re: discovery and settlement	0.2	0	\$ 200	\$ -	Discovery Related
135	4/20/2017	Shanon Levin	Prepare for and attend Rule 26(f) conference	1	0	\$ 355	\$ -	Discovery Related
136	4/20/2017	Shanon Levin	Meet w/ DHaubert re discovery and settlement	0.2	0	\$ 355	\$ -	Discovery Related
137	4/21/2017	Dynah Haubert	Edit Stip. for ext of time to reflect counsels' convo.; confer w/ S. Levin re: same; circulate same via email	0.2	0.2	\$ 200	\$ 40.00	
138	4/21/2017	Dynah Haubert	Review all plans provided to date and confer w/ R. Iacullo re: same	0.8	0.8	\$ 200	\$ 160.00	
139	4/21/2017	Shanon Levin	Review proposed stipulation; meet w/ DHaubert re same	0.2	0.2	\$ 355	\$ 71.00	
140	4/21/2017	Rocco Iacullo	Confer w/ DH re architectural plans	0.8	0.8	\$ 305	\$ 244.00	
141	4/26/2017	Dynah Haubert	Research and draft reply to J. Kinkopf re: parking lot, rear door and ramp surface	1.2	1.2	\$ 200	\$ 240.00	Discovery Related
142	4/26/2017	Shanon Levin	Prepare consent decree	1.7	1.7	\$ 355	\$ 603.50	
143	4/26/2017	Shanon Levin	Email correspondence re discovery plan	0.2	0	\$ 355	\$ -	Discovery Related
144	4/28/2017	Dynah Haubert	Review S. Levin's draft of consent decree	0.1	0.1	\$ 200	\$ 20.00	
145	4/28/2017	Dynah Haubert	Draft discovery plan	2.1	2.1	\$ 200	\$ 420.00	Discovery Related
146	4/28/2017	Dynah Haubert	Draft Pl's initial disclosures	0.4	0.4	\$ 200	\$ 80.00	Discovery Related
147	5/1/2017	Dynah Haubert	Meet w/ SLevin re: Rule 26(f) plan and review/edit draft plan	0.4	0.4	\$ 200	\$ 80.00	Discovery Related
148	5/1/2017	Shanon Levin	Meet w/ DHaubert re Rule 26(f) plan and review/edit draft plan	0.4	0	\$ 355	\$ -	Discovery Related
149	5/2/2017	Shanon Levin	Review letter from defense counsel	0.5	0.5	\$ 355	\$ 177.50	
150	5/3/2017	Dynah Haubert	Draft timeline of pre-filing communications w/ Defs for SL	0.3	0.3	\$ 200	\$ 60.00	
151	5/3/2017	Dynah Haubert	Review & edit S. Levin letter to Judge	0.2	0.2	\$ 200	\$ 40.00	
152	5/3/2017	Shanon Levin	Emails re Rule 26(f) conference	0.2	0	\$ 355	\$ -	Discovery Related
153	5/4/2017	Dynah Haubert	Edit & finalize initial disclosures	0.4	0.4	\$ 200	\$ 80.00	Discovery Related
154	5/4/2017	Dynah Haubert	Attend teleconference with counsel & judge	0.3	0.3	\$ 200	\$ 60.00	
155	5/4/2017	Dynah Haubert	Meet w/ SLevin re court conference, outcome, and strategy	0.4	0.4	\$ 200	\$ 80.00	
156	5/4/2017	Shanon Levin	Meet w/ DHaubert re court conference, outcome, and strategy	0.4	0.4	\$ 355	\$ 142.00	
157	5/5/2017	Dynah Haubert	Draft consent decree	1.4	1.4	\$ 200	\$ 280.00	
158	5/5/2017	Dynah Haubert	Review court order; meet w/ SLevin re next steps	0.2	0.2	\$ 200	\$ 40.00	
159	5/5/2017	Shanon Levin	Review court order; meet w/ DHaubert re next steps	0.2	0.2	\$ 355	\$ 71.00	
160	5/8/2017	Dynah Haubert	Draft consent decree	3.8	3.8	\$ 200	\$ 760.00	
161	5/9/2017	Dynah Haubert	Draft & edit Consent Decree	1.2	1.2	\$ 200	\$ 240.00	
162	5/9/2017	Dynah Haubert	Confer w/ S. Levin re consent decree	0.2	0.2	\$ 200	\$ 40.00	
163	5/9/2017	Dynah Haubert	TC w/ client re case updates, consent decree	0.2	0.2	\$ 200	\$ 40.00	
164	5/9/2017	Shanon Levin	Review emails and meet w/ DHaubert re next steps, consent decree	0.2	0.2	\$ 355	\$ 71.00	

165	5/10/2017	Dynah Haubert	Draft & edit consent decree	0.8	0.8	\$ 200	\$ 160.00	
166	5/10/2017	Dynah Haubert	Meet w/ SLevin re consent decree and experts	0.2	0.2	\$ 200	\$ 40.00	
167	5/10/2017	Shanon Levin	Meet w/ DHaubert re consent decree and experts	0.2	0.2	\$ 355	\$ 71.00	
168	5/11/2017	Dynah Haubert	Calculate attorneys fees	0.2	0.2	\$ 200	\$ 40.00	
169	5/11/2017	Dynah Haubert	Meet w/ SLevin re status and t/c w/ client	0.5	0.5	\$ 200	\$ 100.00	
170	5/11/2017	Shanon Levin	Meet w/ DHaubert re status and t/c w/ client	0.5	0.5	\$ 355	\$ 177.50	
171	5/19/2017	Dynah Haubert	TC w/ R Thomas re: consulting on case	0.2	0.2	\$ 200	\$ 40.00	
172	5/23/2017	Dynah Haubert	Revise rept of rule 26 f meeting/status rept and send to opposing counsel	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
173	5/23/2017	Dynah Haubert	Draft requests for admission	0.8	0.8	\$ 200	\$ 160.00	Discovery Related
174	5/24/2017	Dynah Haubert	Draft RFAs	0.9	0.9	\$ 200	\$ 180.00	Discovery Related
175	5/25/2017	Dynah Haubert	Review 2401 Defs' Answer	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
176	5/25/2017	Dynah Haubert	Review Garces' Answer	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
177	5/25/2017	Dynah Haubert	Revise 26(f) report and email to defs' counsel	0.2	0.2	\$ 200	\$ 40.00	Discovery Related
178	5/25/2017	Dynah Haubert	Meet w/ SLevin re discovery and answer	0.5	0.5	\$ 200	\$ 100.00	Discovery Related
179	5/25/2017	Shanon Levin	Meet w/ DHaubert re discovery and answer	0.5	0	\$ 355	\$ -	Discovery Related
180	5/26/2017	Dynah Haubert	Prepare discovery requests	0.7	0.7	\$ 200	\$ 140.00	Discovery Related
181	5/30/2017	Dynah Haubert	Draft interrogatories	1.3	1.3	\$ 200	\$ 260.00	Discovery Related
182	5/31/2017	Dynah Haubert	Draft reqs. for admission, interrogatories,and doc. requests	5.1	5.1	\$ 200	\$ 1,020.00	Discovery Related
183	6/1/2017	Shanon Levin	Review and revise discovery requests	1.2	0	\$ 355	\$ -	Discovery Related
184	6/2/2017	Dynah Haubert	Edit RFAs	1.6	0	\$ 200	\$ -	Discovery Related
185	6/2/2017	Shanon Levin	Review and revise discovery requests	1.2	0	\$ 355	\$ -	Discovery Related
186	6/5/2017	Dynah Haubert	Meet w/ SLevin re discovery requests and court conference	0.4	0	\$ 200	\$ -	Discovery Related
187	6/5/2017	Dynah Haubert	Draft 1st Interrogs, RFA, Doc Requests to all defs.	5.3	0	\$ 200	\$ -	Discovery Related
188	6/5/2017	Shanon Levin	Meet w/ DHaubert re discovery requests and court conference	0.4	0	\$ 355	\$ -	Discovery Related
189	6/6/2017	Dynah Haubert	Draft 1st Interrogs, RFA, Doc Requests to all defs.	2.6	0	\$ 200	\$ -	Discovery Related
190	6/14/2017	Dynah Haubert	Review J's procedures and fed/local rules to prep for rule 16 conference	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
191	6/15/2017	Dynah Haubert	Confer w/ SL to prep for Rule 16 conference	0.2	0.2	\$ 200	\$ 40.00	Discovery Related
192	6/15/2017	Dynah Haubert	Review docs to prep for Rule 16 conference	1	1	\$ 200	\$ 200.00	Discovery Related
193	6/15/2017	Shanon Levin	Prepare w/ DHaubert re Rule 16 Conference	0.2	0.2	\$ 355	\$ 71.00	Discovery Related
194	6/16/2017	Dynah Haubert	Rule 16 conference	0.3	0.3	\$ 200	\$ 60.00	Discovery Related
195	6/16/2017	Dynah Haubert	Confer w/ S Levin re Rule 16 conference, next steps	0.2	0.2	\$ 200	\$ 40.00	Discovery Related
196	6/16/2017	Shanon Levin	Confer w/ DHaubert re Rule 16 conference and strategy	0.2	0.2	\$ 355	\$ 71.00	Discovery Related
197	6/19/2017	Dynah Haubert	Confer w/ S Levine re: experts	0.3	0.3	\$ 200	\$ 60.00	
198	6/19/2017	Dynah Haubert	Confer w/ Dhaubert re : experts	0.3	0.3	\$ 200	\$ 60.00	
199	6/28/2017	Shanon Levin	Consider status and strategy; review email correspondance	0.4	0.4	\$ 355	\$ 142.00	
200	6/29/2017	Shanon Levin	Meet w/ DHaubert re conference w/ Judge	0.2	0.2	\$ 355	\$ 71.00	
201	6/29/2017	Dynah Haubert	meet w/ SL re conference w/ Judge	0.2	0.2	\$ 200	\$ 40.00	
202	6/30/2017	Dynah Haubert	TC to client to update	0.2	0.2	\$ 200	\$ 40.00	
203	6/30/2017	Kelly Darr	Meeting w/ DH re: fees	0.2	0.2	\$ 355	\$ 71.00	
204	6/30/2017	Dynah Haubert	Discuss fees w/ KD	0.2	0.2	\$ 200	\$ 40.00	
205	7/6/2017	Dynah Haubert	Prepare settlement memo	1.4	1.4	\$ 200	\$ 280.00	
206	7/6/2017	Shanon Levin	Review and revise settlement memo; review defs' changes to consent decree and meet w/ Dhaubert re same	1.9	1.9	\$ 355	\$ 674.50	
207	7/6/2017	Dynah Haubert	Meet w/ SL re changes to CD	0.6	0.6	\$ 200	\$ 120.00	
208	7/7/2017	Shanon Levin	Prep for and attend settlement conference	2.7	2.7	\$ 355	\$ 958.50	
209	7/7/2017	Dynah Haubert	Prep, attend settlement conference	2.5	2.5	\$ 200	\$ 500.00	
210	7/7/2017	Shanon Levin	Review and respond to emails; comment on draft communications	0.2	0.2	\$ 355	\$ 71.00	
211	7/10/2017	Shanon Levin	Meet w/ DHaubert re strategy	0.2	0.2	\$ 355	\$ 71.00	

212	7/10/2017	Dynah Haubert	Confer w/ SL re strategy	0.2	0.2	\$ 200	\$ 40.00
213	7/11/2017	Dynah Haubert	TC w/ MJ Hey and counsel re exhibits (.3); draft letter to DMccomb clarifying what we need for exhibits	1.7	1.7	\$ 200	\$ 340.00
214	7/11/2017	Dynah Haubert	Confer / SL re court conference	0.2	0.2	\$ 200	\$ 40.00
215	7/11/2017	Shanon Levin	Confer w/ DHaubert re conference with Court	0.2	0.2	\$ 355	\$ 71.00
216	7/11/2017	Shanon Levin	Emails re consent decree exhibits; draft correspondence; review defs' consent decree	1.2	1.2	\$ 355	\$ 426.00
217	7/12/2017	Dynah Haubert	Continue drafting letter (.4); confer re same w SL (.2)	0.6	0.6	\$ 200	\$ 120.00
218	7/12/2017	Dynah Haubert	Review defs' exhibits provided today	0.3	0.3	\$ 200	\$ 60.00
219	7/12/2017	Dynah Haubert	Emails and TC w/ DMccomb re curb in parking lot	0.2	0.2	\$ 200	\$ 40.00
220	7/12/2017	Dynah Haubert	TC w/ counsel and Magistrate re settlement next steps	0.1	0.1	\$ 200	\$ 20.00
221	7/12/2017	Shanon Levin	Review and comment on letter to Judge; meet w/ DHaubert re court conference and strategy	0.4	0.4	\$ 355	\$ 142.00
222	7/26/2017	Dynah Haubert	TC w/ R Thomas re: update on his evaluation; notes/email to S Levin re same	0.3	0.3	\$ 200	\$ 60.00
223	7/31/2017	Dynah Haubert	Draft email to OC re today's conference and issues to discuss	0.3	0.3	\$ 200	\$ 60.00
224	7/31/2017	Dynah Haubert	Attend teleconference w/ magistrate judge re status	0.2	0.2	\$ 200	\$ 40.00
225	8/1/2017	Dynah Haubert	Edit proposed consent decree	1.9	1.9	\$ 200	\$ 380.00
226	8/2/2017	Dynah Haubert	TC w/ expert R Thomas re his review of site & exhibits	1	1	\$ 200	\$ 200.00
227	8/2/2017	Dynah Haubert	Revise & analyze notes from call w/ expert	0.4	0.4	\$ 200	\$ 80.00
228	8/3/2017	Dynah Haubert	Confer w. SL re expert's recommendations	1	1	\$ 200	\$ 200.00
229	8/3/2017	Dynah Haubert	Edits to CD	1	1	\$ 200	\$ 200.00
230	8/3/2017	Shanon Levin	Meet w/ DH re expert's recommendations	1	1	\$ 355	\$ 355.00
231	8/4/2017	Dynah Haubert	Make edits to CD to incorporate expert recommendations	1.6	1.6	\$ 200	\$ 320.00
232	8/4/2017	Dynah Haubert	Confer w/ SL re edits to CD	0.3	0.3	\$ 200	\$ 60.00
233	8/4/2017	Dynah Haubert	Final edits to CD, gather and verify labels on all exhibits	0.7	0.7	\$ 200	\$ 140.00
234	8/4/2017	Shanon Levin	Review and comment on consent decree; meet w/ DHaubert re expert's comments	0.7	0.7	\$ 355	\$ 248.50
235	8/8/2017	Dynah Haubert	Corr. w/ client re CD	0.2	0.2	\$ 200	\$ 40.00
236	8/8/2017	Dynah Haubert	Gather CD & exhibits and email to OC	0.1	0.1	\$ 200	\$ 20.00
237	8/14/2017	Dynah Haubert	Teleconference w/ OC and C. Block re changes to consent decree (.6); report to SL re same (.1)	0.7	0.7	\$ 200	\$ 140.00
238	8/14/2017	Shanon Levin	Meet w/ DHaubert re conference w/ defense counsel	0.1	0.1	\$ 355	\$ 35.50
239	8/15/2017	Dynah Haubert	Followup from 8/14 TC: edit consent decree, research re 2401's concerns re lot, email expert R. Thomas re lot	0.7	0.7	\$ 200	\$ 140.00
240	8/15/2017	Dynah Haubert	Review and incorporate defendant Garces' changes to consent decree	0.2	0.2	\$ 200	\$ 40.00
241	8/16/2017	Dynah Haubert	TC w/ R. Thomas re parking lot concerns (.2), notes to file re same (.2)	0.4	0.4	\$ 200	\$ 80.00
242	8/21/2017	Dynah Haubert	draft email to OC AND JOINT STATUS REPORT .2; CONFERW/ sl RE SAME.2	0.4	0.4	\$ 200	\$ 80.00
243	8/21/2017	Dynah Haubert	Draft status report addendum .3; confer w/ SL re same .2	0.5	0.5	\$ 200	\$ 100.00
244	8/21/2017	Shanon Levin	Meet w/ DHaubert re status; review and revise Status Report	0.5	0.5	\$ 355	\$ 177.50
245	8/22/2017	Dynah Haubert	Confer w/ SL re status report to court	0.1	0.1	\$ 200	\$ 20.00
246	8/22/2017	Shanon Levin	Review and comment on revised consent decree; meet w/ DHaubert re status report to judge	0.2	0.2	\$ 355	\$ 71.00
247	8/22/2017	Dynah Haubert	review SL edits to CD	0.5	0.5	\$ 200	\$ 100.00
248	8/23/2017	Shanon Levin	Confer w/ DH re CD, conference	0.1	0.1	\$ 355	\$ 35.50
249	8/23/2017	Dynah Haubert	Confer w/ SL re consent decree, conference	0.1	0.1	\$ 200	\$ 20.00
250	8/23/2017	Dynah Haubert	Teleconference w/ OC and Judge Hey re: consent decree & fees	0.2	0.2	\$ 200	\$ 40.00
251	8/23/2017	Dynah Haubert	review new info and exhibits from 2401 defs	0.5	0.5	\$ 200	\$ 100.00

252	8/24/2017	Dynah Haubert	Draft email to OC re CD edits, parking lot, and fees, incl. calculating fees to date	1.1	1.1	\$ 200	\$ 220.00	
253	8/24/2017	Dynah Haubert	Edits to CD per latest evidence from 2401; gather corresponding exhibits	0.8	0.8	\$ 200	\$ 160.00	
254	8/25/2017	Dynah Haubert	Research re parking lot pedestrian route designation .2; email SL re sharing CD with defendants .3	0.5	0.5	\$ 200	\$ 100.00	
255	8/28/2017	Dynah Haubert	TC w/ DMCombs and C. Block re CD changes .3; TC w/ OC and Judge Hey re status of negotiations .2, TC w/ Judge Hey at her request re: CD and fees .1; write notes to file re calls .2	0.8	0.8	\$ 200	\$ 160.00	
256	8/29/2017	Dynah Haubert	Email R. Thomas re invoice and fees for future review .2; email SL re same.1	0.3	0.3	\$ 200	\$ 60.00	
257	8/30/2017	Dynah Haubert	Review 2401 new exhibits and edits to CD and research in ADA standards re same; email OC re same	0.5	0.5	\$ 200	\$ 100.00	
258	8/30/2017	Dynah Haubert	TC w/ expert R Thomas re invoice	0.1	0.1	\$ 200	\$ 20.00	
259	8/30/2017	Dynah Haubert	Meet w/ SL re remaining issues on CD and fees	0.3	0.3	\$ 200	\$ 60.00	
260	8/30/2017	Shanon Levin	Confer w/ DH re remaining issues	0.3	0.3	\$ 355	\$ 106.50	
261	8/31/2017	Dynah Haubert	Draft email to OC re their CD edits; confer w/ SL re same	0.2	0.2	\$ 200	\$ 40.00	
262	8/31/2017	Dynah Haubert	Review and accept as applicable 2401's redlines to CD; ensure correct updated set of exhibits	0.5	0.5	\$ 200	\$ 100.00	
263	8/31/2017	Shanon Levin	Meet w/ DHaubert re settlement	0.1	0.1	\$ 355	\$ 35.50	
264	9/19/2017	Dynah Haubert	Review latest correspondence; discuss same w/ SL (.1); email OC re status	0.3	0.3	\$ 200	\$ 60.00	
265	9/21/2017	Dynah Haubert	Draft email to Judge Hey re: case status, requesting conference	0.3	0.3	\$ 200	\$ 60.00	
266	9/21/2017	Dynah Haubert	TC w/ OC re "ADA standards" provision in CD	0.3	0.3	\$ 200	\$ 60.00	
267	9/28/2017	Dynah Haubert	TC w/ OC and C Block before MJ Hey	0.5	0.5	\$ 200	\$ 100.00	
268	9/29/2017	Dynah Haubert	Update SL on call w/ Judge Hey	0.1	0.1	\$ 200	\$ 20.00	
269	9/29/2017	Shanon Levin	Meet w/ DHaubert re status and strategy	0.1	0.1	\$ 355	\$ 35.50	
270	10/2/2017	Dynah Haubert	Review CD and fee info for call w/ Judge Hey, incl. calculating latest fees	0.6	0.6	\$ 200	\$ 120.00	
271	10/3/2017	Dynah Haubert	Meet w/ SL to prep for call .2; TC w/ Judge Hey at her request, .3	0.5	0.5	\$ 200	\$ 100.00	
272	10/3/2017	Shanon Levin	Confer w/ DHaubert re strategy; t/c w/ Judge Hey	0.5	0.5	\$ 355	\$ 177.50	
273	10/6/2017	Shanon Levin	Confer w/ DHaubert re settlement	0.2	0.2	\$ 355	\$ 71.00	
274	10/6/2017	Dynah Haubert	TC from Judge Hey re 2401 proposal on CD & fees, .1; confer w/ SL re same, .2	0.3	0.3	\$ 200	\$ 60.00	
275	10/10/2017	Shanon Levin	Confer w/ DHaubert re response to 2401 proposal	0.2	0.2	\$ 355	\$ 71.00	
276	10/10/2017	Dynah Haubert	Meet w/ SL re response to Judge Hey	0.2	0.2	\$ 200	\$ 40.00	
277	10/10/2017	Shanon Levin	Research re attorney fee awards	0.2	0.2	\$ 355	\$ 71.00	
278	10/11/2017	Dynah Haubert	TC w/ A Goldstein re: conference and her client's agreement with 2401, .1; confer w/ SL re response to Judge Hey, .1; draft email response to Judge Hey, .3	0.5	0.5	\$ 200	\$ 100.00	
279	10/11/2017	Dynah Haubert	Review mgmt agreement btwn Garces Rest. Group and 2401, and letter re same from A Goldstein	0.5	0.5	\$ 200	\$ 100.00	Discovery Related
280	10/11/2017	Dynah Haubert	LVM for client asking to CB re case update	0.1	0.1	\$ 200	\$ 20.00	
281	10/11/2017	Shanon Levin	Confer w/ DHaubert re strategy; review and revise email to Judge Hey	0.6	0.6	\$ 355	\$ 213.00	
282	10/12/2017	Dynah Haubert	TC w/ client re case updates	0.2	0.2	\$ 200	\$ 40.00	
283	10/12/2017	Dynah Haubert	TC from Judge Hey re 2401's response re CD	0.1	0.1	\$ 200	\$ 20.00	
284	10/12/2017	Dynah Haubert	Email to client re CD language	0.2	0.2	\$ 200	\$ 40.00	
285	10/12/2017	Shanon Levin	Review notes of conversation w/ client and Judge Hey; review and revise draft email	0.3	0.3	\$ 355	\$ 106.50	
286	10/13/2017	Dynah Haubert	Meet w/ SL re strategy	0.3	0.3	\$ 200	\$ 60.00	
287	10/13/2017	Shanon Levin	Review email correspondence; meet w/ DHaubert re strategy	0.5	0.5	\$ 355	\$ 177.50	

288	10/16/2017	Dynah Haubert	Review draft final CD from OC (.2), confer w/ SL re response (.2), draft language re fees & enforcement (.2)	0.6	0.6	\$ 200	\$ 120.00
289	10/16/2017	Dynah Haubert	TC w/ Dave and C. Block re overhead sign	0.5	0.5	\$ 200	\$ 100.00
290	10/16/2017	Dynah Haubert	Confer w/ SL re overhead sign	0.3	0.3	\$ 200	\$ 60.00
291	10/16/2017	Shanon Levin	Meet w/ DHaubert re status and strategy; review Defs' Consent Decree and prepare Consent Decree language	2	2	\$ 355	\$ 710.00
292	10/16/2017	Shanon Levin	Review email correspondence; prepare for conference; prepare email correspondence to opposing counsel and judge	1.7	1.7	\$ 355	\$ 603.50
293	10/17/2017	Dynah Haubert	Attend status teleconference w/ OC and Judge Pappert	0.5	0.5	\$ 200	\$ 100.00
294	10/18/2017	Dynah Haubert	Per D. McComb's request, edited consent decree formatting and verified correct identification of exhibits	0.5	0.5	\$ 200	\$ 100.00
295	10/17/2017	Shanon Levin	Confer w/ DHaubert re status and strategy	0.4	0.4	\$ 355	\$ 142.00
296	10/17/2017	Dynah Haubert	Meet w/ SL re case status, strategy	0.4	0.4	\$ 200	\$ 80.00
297	10/17/2017	Shanon Levin	T/C w/ defense counsel	0.2	0.2	\$ 355	\$ 71.00
298	10/20/2017	Dynah Haubert	TC w/ client re signing consent decree, timeline for modifications	0.3	0.3	\$ 200	\$ 60.00
299	10/23/2017	Dynah Haubert	Per Mr. McComb's request, put together counterparts and email executed CD and exhibits to Judge Pappert	0.2	0.2	\$ 200	\$ 40.00
300	10/30/2017	Shanon Levin	Meet w/ Dhaubert re fee offer	0.1	0.1	\$ 355	\$ 35.50
301	10/30/2017	Dynah Haubert	Email to OC re fee offer, confer w/ SL re same (.1)	0.3	0.3	\$ 200	\$ 60.00
302	11/2/2017	Dynah Haubert	Prepare DRP form for payment of invoice for R. Thomas's review of planned modifications	0.2	0.2	\$ 200	\$ 40.00
303	12/14/2017	Shanon Levin	Review and comment on Status Report	0.2	0.2	\$ 355	\$ 71.00
304	12/18/2017	Dynah Haubert	Review DMccomb's status letter (.2); attend status conference (.2); meet w/ SL re status conference (.2)	0.6	0.6	\$ 200	\$ 120.00
305	12/18/2017	Shanon Levin	Meet w/ DHaubert re t/c w/ judge	0.2	0.2	\$ 355	\$ 71.00
306	12/22/2017	Dynah Haubert	Review add'l photos from DMccomb (.2); emails re scheduling inspection w/architect and M Leahy (.3)	0.5	0.5	\$ 200	\$ 100.00
307	1/3/2018	Dynah Haubert	Begin to draft fee motion	0.3	0.3	\$ 200	\$ 60.00
308	1/4/2018	Dynah Haubert	Research & draft fee motion (.7); email w/ client re inspection (.1)	0.8	0.8	\$ 200	\$ 160.00
309	1/8/2018	Dynah Haubert	TC w/ client to prep for site inspection	0.2	0.2	\$ 200	\$ 40.00
310	1/10/2018	Dynah Haubert	Prepare for site inspection (review pictures/plans of modifications to be inspected and gather necessary materials and tools)	0.6	0.6	\$ 200	\$ 120.00
311	1/10/2018	Dynah Haubert	Site inspection (including .6 travel b/w DRP office and site)	1.5	1.5	\$ 200	\$ 300.00
312	1/11/2018	Shanon Levin	Meet w/ DHaubert re inspection	0.2	0.2	\$ 355	\$ 71.00
313	1/11/2018	Dynah Haubert	Review results of site inspection (.5); review items with SLevin (.2); TC w/ client re issues to be reported to defs. (.1); email w/ RThomas re issues (.1); email OC re outstanding issues	1	1	\$ 200	\$ 200.00
314	1/16/2018	Dynah Haubert	Email w/ DMccomb re CD compliance issues and review issues w/ RResnick	0.3	0.3	\$ 200	\$ 60.00
315	1/17/2018	Dynah Haubert	Confer w/ SLevin re case updates	0.1	0.1	\$ 200	\$ 20.00
316	1/16/2018	Dynah Haubert	Draft fee order	1	1	\$ 200	\$ 200.00
317	1/17/2018	Dynah Haubert	Draft fee order and sections of fee petition	3.3	3.3	\$ 200	\$ 660.00
318	1/17/2018	Shanon Levin	Meet w/ DHaubert re inspection	0.1	0.1	\$ 355	\$ 35.50
319	1/18/2018	Dynah Haubert	Draft sections of fee petition	4.3	4.3	\$ 200	\$ 860.00
320	1/19/2018	Dynah Haubert	Draft sections of fee petition	1.9	1.9	\$ 200	\$ 380.00
321	1/21/2018	Dynah Haubert	Corr. w. expert re invoice (.1); draft sections of fee petition (1.5)	1.6	1.6	\$ 200	\$ 320.00
322	1/22/2018	Dynah Haubert	Draft & edit sections of fee petition (2.1); identify exhibits to brief (.5); calculate fees to date (.4)	3	3	\$ 200	\$ 600.00

323	1/23/2018	Dynah Haubert	Draft Haubert declaration for fee petition	1.1	1.1	\$ 200	\$ 220.00	
324	1/24/2018	Dynah Haubert	Draft Darr declaration for fee petition	0.7	0.7	\$ 200	\$ 140.00	
325	1/24/2018	Kelly Darr	Review itemized fees and exercise billing judgment	0.4	0.4	\$ 355	\$ 142.00	
326	1/29/2018	Dynah Haubert	Edit fee brief, declarations, exhibits	2.3	2.3	\$ 200	\$ 460.00	
Total Reasonable Attorneys' Hours / Fees				216.5	181.3		\$ 43,203.00	