

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**DECLARATION OF DAVID D. CROSS IN SUPPORT OF PLAINTIFFS’
JOINT MOTION FOR SANCTIONS**

I, David D. Cross, declare as follows:

1. I am a member of the bars of the State of New York and the District of Columbia. I am a partner with the law firm of Morrison & Foerster LLP, and lead counsel in this case representing Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) in the above-captioned matter. I have been admitted *pro hac vice* in these proceedings. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

Description of Work in Connection with the GEMS Discovery Dispute

2. I was extensively involved with Plaintiffs’ efforts to obtain discovery of GEMS databases from Defendants, over objections that the structure of the

databases was unique to Georgia and that disclosure of GEMS databases to Plaintiffs could jeopardize the security of Georgia's election system.

3. Morrison & Foerster now seeks its fees and costs in connection with the parties' litigation of the production of the GEMS databases, as described in the contemporaneously filed Joint Motion for Sanctions (the "GEMS Dispute").

4. Over several weeks, I communicated extensively and coordinated strategy via email and teleconference with a team of attorneys at Morrison & Foerster, LLP, and Krevolin & Horst, LLC, regarding the GEMS Dispute. I also communicated with Coalition Plaintiffs' counsel, the individual Curling Plaintiffs, Curling Plaintiffs' expert Dr. J. Alex Halderman, Defendants' counsel, and the Court and court personnel regarding the GEMS Dispute.

5. I oversaw the drafting and filing of multiple briefs and other papers filed in connection with the GEMS Dispute, including on July 3, 8, and 10, 2019.

6. I participated in a teleconference with the Court on the subject of the GEMS Dispute on June 28, 2019, and a conference with the Court on the same subject on July 11, 2019.

7. After the Court ordered Defendants to produce the GEMS databases, I instructed Dr. Halderman to set up a secure environment and compare them to publicly available GEMS databases.

8. When Dr. Halderman reported that the structure of the databases Defendants had refused to disclose was not unique to Georgia, and it became clear that Defendants' repeated objection to disclosure was demonstrably false, I instructed my team to prepare the current motion for sanctions.

9. I have personally revised and overseen the finalization and filing of the current motion and its supporting materials.

Identification of Time Expended

10. I oversaw and exercised responsibility over the work done by my colleagues in connection with the GEMS Dispute.

11. Quickly after the GEMS Dispute began, I instructed my colleagues at Morrison & Foerster to distinguish GEMS Dispute-related work from other work in their contemporaneous time records by showing the time spent on each GEMS-related task in parenthesis, *e.g.*, "draft declaration regarding GEMS review (1.25)."

12. I personally reviewed the detailed fee report that the Morrison & Foerster accounting department generated. A true and correct copy of that report is attached to this declaration as **Exhibit A**.

13. I understand the non-redacted entries accurately reflect time the Morrison & Foerster team actually expended in connection with the GEMS Dispute.

14. In connection with this motion, we specifically do not seek any fees for which the portion of any time entry related to the GEMS Dispute is not clearly distinguishable from any unrelated portion. As a result, the amount of time claimed in this motion *significantly understates* the amount of time actually and reasonably expended by Morrison & Foerster in connection with the GEMS Dispute.

Detailed Breakdown of Relevant Time

15. I am a trial lawyer and partner in Morrison & Foerster's Global Antitrust Practice. Over seventeen years, I have focused my practice on complex business litigation. I received my J.D. in 2002 from Columbia Law School. I also clerked for the Honorable Michael B. Mukasey, former Chief Judge of the U.S. District Court for the Southern District of New York and U.S. Attorney General.

My hourly rate in 2019 is \$1,065 per hour. The total amount of my time on the GEMS Dispute was **45.5 hours**.

Hours Spent in GEMS Database Discovery Dispute			
	Category	Hours	Fees Requested at \$1,065/hr
D. Cross	Review and analyze Defendants' filings	1.75	\$ 1,863.75
	Review and analyze Court orders	2.25	\$ 2,396.25
	Correspond or confer with Defendants' counsel	5.00	\$ 5,325.00
	Communicate and coordinate strategy with team, CP counsel, clients, or expert	14.50	\$ 15,442.50
	Prepare for and participate in Court conferences or teleconferences	5.50	\$ 5,857.50
	Review research	1.50	\$ 1,597.50
	Review and revise filings	10.75	\$ 11,448.75
	Inspect and coordinate setup of GEMS databases for inspection	4.25	\$ 4,526.25
	Subtotal for D. Cross	45.50	\$ 48,457.50

16. Catherine Chapple was a senior associate in the firm's litigation practice. She received her J.D. in 2012 from Wake Forest University School of Law. She also clerked for the Honorable Judge George W. Miller of the United States Court of Federal Claims during the 2012-2013 term. She recently left Morrison &

Foerster to take an in-house counsel position at Google. Her hourly rate in 2019 was \$800 per hour, and she identified **65.75 hours** on the GEMS Dispute.

Hours Spent in GEMS Database Discovery Dispute			
	Category	Hours	Fees Requested at \$800/hr
C. Chapple	Analyze Defendants' filings	0.50	\$ 400.00
	Analyze Court orders	0.75	\$ 600.00
	Correspond with or meet and confer with Defendants' counsel or prepare for same	8.50	\$ 6,800.00
	Discuss strategy and particular filings with team, CP counsel, clients, or expert	13.75	\$ 11,000.00
	Prepare for and participate in Court conferences or teleconferences	6.25	\$ 5,000.00
	Draft and revise briefs and other court filings	28.00	\$ 22,400.00
	Inspect and coordinate setup of secure room for GEMS database inspection	2.50	\$ 2,000.00
	Discuss motion to seal filing	2.75	\$ 2,200.00
	Coordinate comparison of screenshots of public and confidential databases	2.75	\$ 2,200.00
	Subtotal for C. Chapple		
		65.75	

17. Cameron Tepfer was an associate in the firm's litigation practice. He received his J.D. in 2013 from NYU School of Law. He also clerked for a judge in the U.S. District Court for the Eastern District of New York during the 2018-2019 term. He recently left Morrison & Foerster to take a position as an Assistant U.S.

Attorney in Washington, D.C. His hourly rate in 2019 was \$750 per hour, and he identified **11.25 hours** on the GEMS Dispute.

Hours Spent in GEMS Database Discovery Dispute			
	Category	Hours	Fees Requested at \$750/hr
C. Tepfer	Draft declaration	1.25	\$ 937.50
	Correspond regarding draft declaration	0.50	\$ 375.00
	Analyze law regarding motions for sanctions	0.50	\$ 375.00
	Review transcripts and docket	0.50	\$ 375.00
	Draft sanctions motion and correspond with team re same	8.50	\$ 6,375.00
	Subtotal for C. Tepfer	11.25	\$ 8,437.50

18. Marcie Brimer was an associate in the firm's litigation practice. She received her J.D. in 2015 from Harvard Law School. Her hourly rate in 2019 was \$650 per hour and she identified **12.5 hours** on the GEMS Dispute.

Hours Spent in GEMS Database Discovery Dispute			
	Category	Hours	Fees Requested at \$650/hr
M. Brimer	Correspond with clients	1.75	\$ 1,137.50
	Correspond with MoFo team	1.00	\$ 650.00
	Review court order	0.25	\$ 162.50
	Prepare confidentiality agreement	1.25	\$ 812.50
	Research re motion to seal	2.50	\$ 1,625.00
	Draft and revise opposition to motion to seal	4.75	\$ 3,087.50
	Compare screenshots of public and confidential databases	1.00	\$ 650.00
	Subtotal for M. Brimer	12.50	\$ 8,125.00

19. Jenna Conaway is a senior paralegal. Her hourly rate in 2019 was \$375 per hour and she identified **6.25 hours** on the GEMS Dispute.

Hours Spent in GEMS Database Discovery Dispute			
	Category	Hours	Fees Requested at \$375/hr
J. Conaway	Cite-check, prepare exhibits, or file papers with the court	2.50	\$ 937.50
	Assist with finalizing edits to briefs	2.00	\$ 750.00
	Assist with finalizing edits to declarations	0.75	\$ 281.25
	Reformat and file GEMS screenshots	0.50	\$ 187.50
	Circulate Defendants' filings	0.25	\$ 93.75
	Coordinate with court reporter regarding transcript	0.25	\$ 93.75
	Subtotal for J. Conaway	6.25	\$ 2,343.75

20. Michael Stoler is a research analyst. His hourly rate in 2019 was \$300 and he identified **1.25 hours** on the GEMS Dispute.

Hours Spent in GEMS Database Discovery Dispute			
	Category	Hours	Fees Requested at \$300/hr
M. Stoler	Research fees cases from N.D. Georgia	1.25	\$ 375.00
	Subtotal for M. Stoler	1.25	\$ 375.00

21. According to the contemporaneous time records and based on my professional experience, I believe the preceding six tables represent a fair and accurate breakdown of each timekeeper's relevant time by task

22. The total amount of fees incurred by Morrison & Foerster attorneys in connection with the GEMS Dispute, subject to further supplementation as described in the Joint Motion for Sanctions, was **\$120,338.75**.

Reasonableness of Time and Hourly Rates

23. In light of my professional experience in complex litigation matters, the total amount of time expended by each of the six named individuals was reasonable and necessary to resolving the GEMS Dispute.

24. The rates used to calculate the current request are the standard rates that Morrison & Foerster charges paying clients for our time, and are reasonable in light of the rates that similar law firms and lawyers charge for the time of attorneys with comparable background and experience.

25. The rates are reasonable under the special circumstances of the GEMS Dispute given the specialized institutional cybersecurity expertise of the firm's Washington, D.C. office, and considering that the Curling Plaintiffs made reasonable efforts to find local counsel to take their case and were unable to find local counsel.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 11th day of October, 2019, in Washington, D.C.

/s/ David D. Cross

DAVID D. CROSS

EXHIBIT A

Client: 089828 - CURLING, DONNA (P) 10/11/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/1/2019	19898	DAVID D. CROSS					
6/2/2019	19898	DAVID D. CROSS					
6/2/2019	22270	ROB MANOSO					
6/2/2019	19972	JANE P. BENTROTT					
6/2/2019	23662	REEMA S. ALI					
6/3/2019	23662	REEMA S. ALI					
6/3/2019	21110	JOHN P. CARLIN					
6/3/2019	19972	JANE P. BENTROTT					
6/3/2019	22270	ROB MANOSO					
6/3/2019	20386	ARVIND S. MIRIYALA					
6/3/2019	19929	JENNA B. CONAWAY					
6/3/2019	19898	DAVID D. CROSS					
6/4/2019	19898	DAVID D. CROSS					
6/4/2019	19929	JENNA B. CONAWAY					
6/4/2019	18553	CATHERINE L. CHAPPLE					

Client: 089828 - CURLING, DONNA (P) 10/11/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/4/2019	20386	ARVIND S. MIRIYALA					
6/5/2019	18553	CATHERINE L. CHAPPLE					
6/5/2019	23662	REEMA S. ALI					
6/5/2019	19929	JENNA B. CONAWAY					
6/5/2019	20386	ARVIND S. MIRIYALA					
6/5/2019	19898	DAVID D. CROSS					
6/6/2019	19898	DAVID D. CROSS					
6/6/2019	21110	JOHN P. CARLIN					
6/6/2019	22270	ROB MANOSO					
6/6/2019	19929	JENNA B. CONAWAY					
6/6/2019	23662	REEMA S. ALI					
6/6/2019	20386	ARVIND S. MIRIYALA					
6/6/2019	18553	CATHERINE L. CHAPPLE					
6/7/2019	20386	ARVIND S. MIRIYALA					
6/7/2019	23662	REEMA S. ALI					
6/7/2019	23781	CAROLINE MCKAY					
6/7/2019	21110	JOHN P. CARLIN					
6/7/2019	19929	JENNA B. CONAWAY					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/7/2019	19972	JANE P. BENTROTT					
6/7/2019	19898	DAVID D. CROSS					
6/8/2019	19898	DAVID D. CROSS					
6/8/2019	23662	REEMA S. ALI					
6/8/2019	18553	CATHERINE L. CHAPPLE					
6/9/2019	21110	JOHN P. CARLIN					
6/9/2019	18553	CATHERINE L. CHAPPLE					
6/9/2019	19898	DAVID D. CROSS					
6/10/2019	19898	DAVID D. CROSS					
6/10/2019	20386	ARVIND S. MIRIYALA					
6/10/2019	18553	CATHERINE L. CHAPPLE					
6/10/2019	23781	CAROLINE MCKAY					
6/10/2019	23662	REEMA S. ALI					
6/11/2019	19972	JANE P. BENTROTT					
6/11/2019	23662	REEMA S. ALI					
6/11/2019	20386	ARVIND S. MIRIYALA					
6/11/2019	18553	CATHERINE L. CHAPPLE					
6/11/2019	19898	DAVID D. CROSS					

Client: 089828 - CURLING, DONNA (P) 10/11/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/12/2019	19898	DAVID D. CROSS					
6/12/2019	20386	ARVIND S. MIRIYALA					
6/12/2019	19929	JENNA B. CONAWAY					
6/12/2019	18553	CATHERINE L. CHAPPLE					
6/12/2019	19972	JANE P. BENTROTT					
6/12/2019	23662	REEMA S. ALI					
6/13/2019	18553	CATHERINE L. CHAPPLE					
6/13/2019	23662	REEMA S. ALI					
6/13/2019	18976	MARCIE BRIMER					
6/13/2019	22270	ROB MANOSO					
6/13/2019	19972	JANE P. BENTROTT					
6/13/2019	19929	JENNA B. CONAWAY					
6/13/2019	20386	ARVIND S. MIRIYALA					
6/13/2019	19898	DAVID D. CROSS					
6/14/2019	20386	ARVIND S. MIRIYALA					
6/14/2019	19929	JENNA B. CONAWAY					
6/14/2019	18976	MARCIE BRIMER					
6/14/2019	23662	REEMA S. ALI					
6/14/2019	15298	THUAN H. NGUYEN					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/14/2019	18553	CATHERINE L. CHAPPLE					
6/15/2019	23662	REEMA S. ALI					
6/15/2019	21110	JOHN P. CARLIN					
6/15/2019	19898	DAVID D. CROSS					
6/16/2019	19898	DAVID D. CROSS					
6/16/2019	21110	JOHN P. CARLIN					
6/16/2019	23662	REEMA S. ALI					
6/17/2019	20386	ARVIND S. MIRIYALA					
6/17/2019	18553	CATHERINE L. CHAPPLE					
6/17/2019	19898	DAVID D. CROSS					
6/18/2019	19898	DAVID D. CROSS					
6/18/2019	20386	ARVIND S. MIRIYALA					
6/18/2019	18976	MARCIE BRIMER					
6/19/2019	21110	JOHN P. CARLIN					
6/19/2019	20386	ARVIND S. MIRIYALA					
6/19/2019	19898	DAVID D. CROSS					
6/20/2019	19898	DAVID D. CROSS					
6/20/2019	20386	ARVIND S. MIRIYALA					
6/20/2019	23662	REEMA S. ALI					
6/21/2019	23662	REEMA S. ALI					
6/21/2019	20386	ARVIND S. MIRIYALA					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/21/2019	23765	NICOLE M. ANG					
6/21/2019	23765	NICOLE M. ANG					
6/21/2019	23765	NICOLE M. ANG					
6/21/2019	23765	NICOLE M. ANG					
6/21/2019	19898	DAVID D. CROSS	3	3,195.00		089828-0000001	56970615
					review and analyze filing re GEMS discovery and communicate with team, CP counsel, and expert re same, and coordinate notice of joinder, and review correspondence from court clerk re same (1.5);		
6/21/2019	19929	JENNA B. CONAWAY	1.25	468.75	Cite-check, prepare exhibits and file Curling Pls' Notice of Joinder in Joint Discovery Statement and Court Conference (1.25).	089828-0000001	56997994
6/22/2019	19898	DAVID D. CROSS					
6/22/2019	20386	ARVIND S. MIRIYALA					
6/22/2019	23662	REEMA S. ALI					
6/23/2019	20386	ARVIND S. MIRIYALA					
6/23/2019	21110	JOHN P. CARLIN					
6/23/2019	19972	JANE P. BENTROTT					
6/23/2019	23662	REEMA S. ALI					
6/23/2019	19929	JENNA B. CONAWAY					
6/23/2019	19898	DAVID D. CROSS					
6/24/2019	19898	DAVID D. CROSS	6.25	6,656.25		089828-0000001	56970627
					review court correspondence re GEMS discovery and communicate with team re same (0.25);		

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/26/2019	19898	DAVID D. CROSS					
6/26/2019	19929	JENNA B. CONAWAY					
6/26/2019	20516	BRIAN WILLIAM HART					
6/26/2019	19972	JANE P. BENTROTT					
6/26/2019	20386	ARVIND S. MIRIYALA					
6/26/2019	22270	ROB MANOSO					
6/26/2019	18553	CATHERINE L. CHAPPLE					
6/26/2019	23662	REEMA S. ALI					
6/26/2019	18976	MARCIE BRIMER					
6/27/2019	20386	ARVIND S. MIRIYALA					
6/27/2019	18553	CATHERINE L. CHAPPLE					
6/27/2019	22270	ROB MANOSO					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/27/2019	23662	REEMA S. ALI					
6/27/2019	19972	JANE P. BENTROTT					
6/27/2019	17318	CAMERON ANDREW TEPFER					
6/27/2019	19929	JENNA B. CONAWAY					
6/27/2019	19898	DAVID D. CROSS					
6/28/2019	19898	DAVID D. CROSS	7.5	7,987.50	Curling. Prepare for and participate in court call and meet and confer GEMS discovery and communicate with team, CP counsel, and expert re same (3.0);	089828-0000001	56970711
6/28/2019	19929	JENNA B. CONAWAY					
6/28/2019	21110	JOHN P. CARLIN					
6/28/2019	18553	CATHERINE L. CHAPPLE	10.5	8,400.00	; prepare for and participate in call with court; meet and confer re GEMS discovery; discuss the same with D.Cross, CP counsel, A. Haderman(3.0);	089828-0000001	56682863

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
6/28/2019	17318	CAMERON ANDREW TEPFER					
6/28/2019	15792	MICHAEL E. WILLENS					
6/28/2019	13085	LAURA RAY					
6/28/2019	14906	YUMIKO DOWNIE-BLACKWELL					
6/28/2019	22270	ROB MANOSO					
6/28/2019	19972	JANE P. BENTROTT					
6/28/2019	23662	REEMA S. ALI					
6/29/2019	17318	CAMERON ANDREW TEPFER					
6/29/2019	21110	JOHN P. CARLIN					
6/29/2019	19898	DAVID D. CROSS	3	3,195.00	communicate with CP counsel re strategy; communicate with team, expert, and CP counsel re GEMS discovery and Ds' objections, and attention to strategy re same (1.0); review research re non-confidentiality of GEMS databases (1.0).	089828-0000001	56970714
6/30/2019	19898	DAVID D. CROSS	3	3,195.00	Review research re non-confidentiality of GEMS databases and communicate with team re same (1.0); review and revise draft declarations re GEMS filing and communicate with team and CP counsel re same (1.0);	089828-0000001	56970716
6/30/2019	17318	CAMERON ANDREW TEPFER					
6/30/2019	23662	REEMA S. ALI					
6/30/2019	18553	CATHERINE L. CHAPPLE	5.75	4,600.00	discuss GEMS discovery issues with D. Cross, A. Halderman, CP counsel; draft brief re GEMS discovery (4.5)	089828-0000001	56676373
7/1/2019	17318	CAMERON ANDREW TEPFER					
7/1/2019	23662	REEMA S. ALI					
7/1/2019	19972	JANE P. BENTROTT					
7/1/2019	22270	ROB MANOSO					
7/1/2019	18553	CATHERINE L. CHAPPLE					
7/1/2019	19929	JENNA B. CONAWAY	0.5	187.5	Assist A. Miriyala with finalizing edits to Plaintiff's Brief regarding GEMS Database discovery (0.5).	089828-0000001	56978852

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
7/1/2019	19898	DAVID D. CROSS	5.75	6,123.75	Review and revise draft filing regarding GEMS and communicate with team, expert, and CP counsel regarding same (2.75); [REDACTED]	089828-0000001	56982525
					[REDACTED]		
					review and analyze defense filing regarding GEMS and communicate with team and CP counsel regarding same (0.5); [REDACTED]		
					[REDACTED]		
7/2/2019	19898	DAVID D. CROSS	4	4,260.00	[REDACTED] review and analyze order regarding GEMS discovery and communicate with team, expert, and CP counsel regarding same and coordinate work on filing regarding same (1.75); [REDACTED]	089828-0000001	56982530
					[REDACTED]		
7/2/2019	19929	JENNA B. CONAWAY			[REDACTED]		
					[REDACTED]		
7/2/2019	20516	BRIAN WILLIAM HART			[REDACTED]		
					[REDACTED]		
7/2/2019	18976	MARCIE BRIMER			[REDACTED]		
7/2/2019	23662	REEMA S. ALI			[REDACTED]		
7/2/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
					[REDACTED]		
7/3/2019	17318	CAMERON ANDREW TEPFER	4.75	3,562.50	[REDACTED] confer with C. Chapple regarding draft declaration (0.50); draft declaration regarding GEMS review (1.25); [REDACTED]	089828-0000001	56704537
					[REDACTED]		
7/3/2019	18976	MARCIE BRIMER			[REDACTED]		
					[REDACTED]		
7/3/2019	22270	ROB MANOSO			[REDACTED]		
					[REDACTED]		
7/3/2019	19972	JANE P. BENTROTT			[REDACTED]		
					[REDACTED]		
7/3/2019	19898	DAVID D. CROSS	4.25	4,526.25	Communicate with team, CP counsel, expert, and defense counsel regarding GEMS discovery, coordinate logistics at firm and in MI regarding GEMS review, draft email to Ds	089828-0000001	56982534
					[REDACTED]		

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					regarding same, and work on filing regarding same (3.5);		
					[REDACTED]		
7/3/2019	19929	JENNA B. CONAWAY	1	375	Assist C. Chapple with editing and finalizing Plaintiffs' Proposal regarding Security Protocols for Review of GEMS database and supporting Cross Declaration, file via ECF (1.0).	089828-0000001	56979405
7/3/2019	23662	REEMA S. ALI			[REDACTED]		
7/3/2019	18553	CATHERINE L. CHAPPLE	6	4,800.00	Review and analyze Order re GEMS discovery; discuss the same with D. Cross, A. Halderman, CP counsel; begin drafting filing re the same. (2.5); prepare for and participate in call with court re GEMS databases; draft proposal for review of databases in Michigan; discuss the same with A. Halderman, D. Cross (3.5).	089828-0000001	56912076
7/4/2019	19898	DAVID D. CROSS			[REDACTED]		
7/5/2019	19898	DAVID D. CROSS	3	3,195.00	[REDACTED]	089828-0000001	56982540
					review and analyze Ds' filing regarding GEMS and communicate with team and CP counsel regarding same, and attention to strategy regarding same (1.0);		
7/5/2019	23662	REEMA S. ALI			[REDACTED]		
7/5/2019	18976	MARCIE BRIMER			[REDACTED]		
7/5/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/6/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/6/2019	18976	MARCIE BRIMER			[REDACTED]		
7/6/2019	23662	REEMA S. ALI			[REDACTED]		
7/6/2019	19898	DAVID D. CROSS			[REDACTED]		
7/6/2019	19929	JENNA B. CONAWAY			[REDACTED]		
7/7/2019	19898	DAVID D. CROSS	4.75	5,058.75	[REDACTED]	089828-0000001	56982544
					ommunicate with CP		

Client: 089828 - CURLING, DONNA (P) 10/11/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					counsel and team regarding GEMS discovery and attention to filing and strategy regarding same (3.0); [REDACTED]		
7/7/2019	18976	MARCIE BRIMER			[REDACTED]		
7/7/2019	22270	ROB MANOSO			[REDACTED]		
7/7/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/8/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/8/2019	19972	JANE P. BENTROTT			[REDACTED]		
7/8/2019	17797	CHRIS KEENER			[REDACTED]		
7/8/2019	18976	MARCIE BRIMER	7.75	5,037.50	[REDACTED] correspond with clients regarding GEMS discovery (0.25); [REDACTED]	089828-0000001	56727514
7/8/2019	22139	ROBYN BYTHEWAY			[REDACTED]		
7/8/2019	8688	CHRISTINA M. BELISARIO			[REDACTED]		
7/8/2019	18553	CATHERINE L. CHAPPLE	10.5	8,400.00	Communicate with D. Cross, CP re GEMS discovery and begin drafting filings regarding the same(3.5); telephone calls with A. Halderman, D.Cross re GEMS discovery reply brief; draft GEMS discovery reply brief (5.5); [REDACTED]	089828-0000001	56731442
7/8/2019	17318	CAMERON ANDREW TEPFER			[REDACTED]		
7/8/2019	15298	THUAN H. NGUYEN			[REDACTED]		
7/8/2019	23662	REEMA S. ALI			[REDACTED]		
7/8/2019	19929	JENNA B. CONAWAY	2.75	1,031.25	Edit and revise Plaintiffs' Reply Brief regarding Security Protocol for GEMS database discovery (0.25); [REDACTED]	089828-0000001	56983097

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					[REDACTED]		
7/10/2019	23662	REEMA S. ALI			[REDACTED]		
7/10/2019	18553	CATHERINE L. CHAPPLE	10	8,000.00	[REDACTED] Participate in call with court re GEMS discovery; draft response to minute order re Phase 1 of GEMS discovery, discuss GEMS database strategy with D. Cross (8.0).	089828-0000001	56912975
7/10/2019	22723	TOM DUGGAN			[REDACTED]		
7/10/2019	18976	MARCIE BRIMER	4.25	2,762.50	[REDACTED] correspond with clients regarding GEMS discovery filings (1.00); correspond with D. Cross and C. Chapple regarding GEMS discovery filing (0.75); [REDACTED]	089828-0000001	56789011
7/11/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/11/2019	18976	MARCIE BRIMER	6.5	4,225.00	[REDACTED] prepare confidentiality agreement regarding GEMS discovery (1.25); [REDACTED]	089828-0000001	56788903
7/11/2019	21110	JOHN P. CARLIN			[REDACTED]		
7/11/2019	18553	CATHERINE L. CHAPPLE	13	10,400.00	[REDACTED] draft additional briefing re GEMS discovery; discuss the same with team (5.25).	089828-0000001	56912977
7/11/2019	23662	REEMA S. ALI			[REDACTED]		
7/11/2019	19929	JENNA B. CONAWAY	3.5	1,312.50	Circulate Defendant's Response to Plaintiff's Brief regarding Phase I GEMS Discovery (0.25); [REDACTED]	089828-0000001	56983087
7/11/2019	19898	DAVID D. CROSS	7.5	7,987.50	[REDACTED] coordinate GEMS discovery (0.5); [REDACTED] prepare for and participate in	089828-0000001	57073571

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
7/12/2019	23781	CAROLINE MCKAY					
7/12/2019	23769	RACHEL KONHEIM DAVIDSON					
7/12/2019	18976	MARCIE BRIMER					
7/12/2019	20386	ARVIND S. MIRIYALA					
7/12/2019	22270	ROB MANOSO					
7/13/2019	22270	ROB MANOSO					
7/13/2019	21110	JOHN P. CARLIN					
7/13/2019	23662	REEMA S. ALI					
7/13/2019	21941	MICHAEL STOLER					
7/13/2019	19898	DAVID D. CROSS					
7/13/2019	19929	JENNA B. CONAWAY					
7/13/2019	19972	JANE P. BENTROTT					
7/13/2019	17318	CAMERON ANDREW TEPFER					
7/14/2019	19972	JANE P. BENTROTT					
7/14/2019	19898	DAVID D. CROSS	5.5	5,857.50		089828-0000001	57158228

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					[REDACTED]		
					attention to discovery dispute regarding malware and communicate with team and expert regarding same; communicate with team, defense counsel, CP counsel, and expert regarding GEMS discovery, work on briefing regarding same, and draft proposal for defendants (2.75).		
7/14/2019	23662	REEMA S. ALI			[REDACTED]		
7/14/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/14/2019	22270	ROB MANOSO			[REDACTED]		
7/15/2019	23769	RACHEL KONHEIM DAVIDSON			[REDACTED]		
7/15/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/15/2019	18976	MARCIE BRIMER			[REDACTED]		
7/15/2019	17318	CAMERON ANDREW TEPFER			[REDACTED]		
7/15/2019	23781	CAROLINE MCKAY			[REDACTED]		
7/15/2019	22723	TOM DUGGAN			[REDACTED]		
7/15/2019	22270	ROB MANOSO			[REDACTED]		
7/15/2019	18553	CATHERINE L. CHAPPLE	13	10,400.00	Meet and confer with defense counsel regarding GEMS issues; draft brief on GEMS discovery issues (9.0); [REDACTED]	089828-0000001	56912973
7/15/2019	19898	DAVID D. CROSS	4.75	5,058.75	Coordinate work on reply brief; work on GEMS discovery brief and communicate with defense counsel, CP counsel, expert, court, and team regarding same (3.0); [REDACTED]	089828-0000001	57158233
7/15/2019	23662	REEMA S. ALI			[REDACTED]		

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					[REDACTED]		
7/15/2019	19929	JENNA B. CONAWAY	2.5	937.5	[REDACTED] [REDACTED] [REDACTED] revise Halderman declaration regarding Malware & GEMS structure (0.5); [REDACTED]	089828-0000001	56983348
7/15/2019	19972	JANE P. BENTROTT			[REDACTED]		
7/16/2019	19929	JENNA B. CONAWAY	2	750	[REDACTED] coordinate with C. Chapple to reformat and file GEMS screenshots provisionally sealed (0.5); [REDACTED]	089828-0000001	56983347
7/16/2019	23662	REEMA S. ALI			[REDACTED]		
7/16/2019	21941	MICHAEL STOLER			[REDACTED]		
7/16/2019	19898	DAVID D. CROSS	6	6,390.00	[REDACTED] attention to GEMS discovery briefing and communicate with defense counsel, CP counsel, expert, court, and team regarding same (1.5); attention to motion to seal GEMS screen shots and communicate with team, defense counsel, CP counsel, expert, and court regarding same (0.5); [REDACTED]	089828-0000001	57158238
7/16/2019	18553	CATHERINE L. CHAPPLE	15	12,000.00	[REDACTED] draft brief related to review of GEMS; coordinate GEMS screenshots; discuss motion to seal filing with J. Conway (8.5).	089828-0000001	56912972
7/16/2019	23781	CAROLINE MCKAY			[REDACTED]		
7/16/2019	17318	CAMERON ANDREW TEPFER			[REDACTED]		
7/16/2019	15298	THUAN H. NGUYEN			[REDACTED]		
7/16/2019	18976	MARCIE BRIMER			[REDACTED]		
7/16/2019	19972	JANE P. BENTROTT			[REDACTED]		

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7/16/2019	20386	ARVIND S. MIRIYALA					
7/16/2019	22270	ROB MANOSO					
7/16/2019	21110	JOHN P. CARLIN					
7/17/2019	23119	DAVE R. ALLMAN					
7/17/2019	23769	RACHEL KONHEIM DAVIDSON					
7/17/2019	17318	CAMERON ANDREW TEPFER					
7/17/2019	23748	THOMAS JOHN WEBB					
7/17/2019	15792	MICHAEL E. WILLENS					
7/17/2019	18553	CATHERINE L. CHAPPLE					
7/17/2019	23745	NICHOLAS WALSH KENNEDY					
7/17/2019	23766	PAUL JOSEPH AYLWARD II					
7/17/2019	15298	THUAN H. NGUYEN					
7/17/2019	18976	MARCIE BRIMER					
7/17/2019	23763	HANNAH ROSE ELSON					
7/17/2019	23747	AARON SCHEINMAN					

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7/19/2019	15298	THUAN H. NGUYEN					
7/19/2019	19972	JANE P. BENTROTT					
7/19/2019	20386	ARVIND S. MIRIYALA					
7/19/2019	18976	MARCIE BRIMER					
7/19/2019	18553	CATHERINE L. CHAPPLE					
7/19/2019	19898	DAVID D. CROSS					
7/19/2019	21110	JOHN P. CARLIN					
7/19/2019	23662	REEMA S. ALI					
7/19/2019	19929	JENNA B. CONAWAY					
7/20/2019	21941	MICHAEL STOLER					
7/20/2019	19898	DAVID D. CROSS					
7/20/2019	23662	REEMA S. ALI					
7/20/2019	15298	THUAN H. NGUYEN					
7/20/2019	19972	JANE P. BENTROTT					
7/20/2019	17318	CAMERON ANDREW TEPFER					

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7/21/2019	17318	CAMERON ANDREW TEPFER					
7/21/2019	19972	JANE P. BENTROTT					
7/21/2019	20386	ARVIND S. MIRIYALA					
7/21/2019	19898	DAVID D. CROSS					
7/21/2019	23662	REEMA S. ALI					
7/21/2019	19929	JENNA B. CONAWAY					
7/22/2019	18976	MARCIE BRIMER					
7/22/2019	19898	DAVID D. CROSS					
7/22/2019	19929	JENNA B. CONAWAY					
7/22/2019	20386	ARVIND S. MIRIYALA					
7/22/2019	15298	THUAN H. NGUYEN					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
7/22/2019	23662	REEMA S. ALI					
7/22/2019	17318	CAMERON ANDREW TEPFER					
7/22/2019	17797	CHRIS KEENER					
7/22/2019	19972	JANE P. BENTROTT					
7/22/2019	22270	ROB MANOSO					
7/22/2019	18553	CATHERINE L. CHAPPLE					
7/22/2019	22723	TOM DUGGAN					
7/23/2019	18553	CATHERINE L. CHAPPLE					
7/23/2019	18976	MARCIE BRIMER	6.25	4,062.50	Research regarding opposition to motion to seal regarding GEMS discovery (2.50);	089828-0000001	56930815
7/23/2019	22270	ROB MANOSO					
7/23/2019	20386	ARVIND S. MIRIYALA					
7/23/2019	19972	JANE P. BENTROTT					
7/23/2019	17318	CAMERON ANDREW TEPFER					
7/23/2019	19929	JENNA B. CONAWAY					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
7/26/2019	17318	CAMERON ANDREW TEPFER					
7/26/2019	18553	CATHERINE L. CHAPPLE					
7/26/2019	19972	JANE P. BENTROTT					
7/26/2019	20386	ARVIND S. MIRIYALA					
7/26/2019	22270	ROB MANOSO					
7/27/2019	15298	THUAN H. NGUYEN					
7/27/2019	23662	REEMA S. ALI					
7/27/2019	19898	DAVID D. CROSS					
7/27/2019	18976	MARCIE BRIMER					
7/27/2019	17797	CHRIS KEENER					
7/27/2019	21110	JOHN P. CARLIN					
7/28/2019	15298	THUAN H. NGUYEN					
7/29/2019	15298	THUAN H. NGUYEN					
7/29/2019	17318	CAMERON ANDREW TEPFER					
7/29/2019	23662	REEMA S. ALI					
7/29/2019	17797	CHRIS KEENER					
7/29/2019	20386	ARVIND S. MIRIYALA					
7/29/2019	19929	JENNA B. CONAWAY					
7/29/2019	19898	DAVID D. CROSS	2.5	2,662.50		089828-0000001	57167432

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					[REDACTED]; communicate with defense counsel regarding GEMS confidentiality and attention to strategy regarding same (0.5); coordinate work on sanctions motion (0.5).		
7/29/2019	18976	MARCIE BRIMER			[REDACTED]		
7/30/2019	18976	MARCIE BRIMER			[REDACTED]		
7/30/2019	23662	REEMA S. ALI			[REDACTED]		
7/30/2019	19929	JENNA B. CONAWAY			[REDACTED]		
7/30/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/30/2019	15298	THUAN H. NGUYEN			[REDACTED]		
7/30/2019	21110	JOHN P. CARLIN			[REDACTED]		
7/30/2019	17318	CAMERON ANDREW TEPFER			[REDACTED]		
7/31/2019	23662	REEMA S. ALI			[REDACTED]		
7/31/2019	17318	CAMERON ANDREW TEPFER	0.5	375	Review hearing transcripts and docket regarding GEMS data extraction.	089828-0000001	56949970
7/31/2019	20386	ARVIND S. MIRIYALA			[REDACTED]		
7/31/2019	17318	CAMERON ANDREW TEPFER	0.5	375	Analyze 11th Circuit law regarding motions for sanctions.	089828-0000001	56948685
7/31/2019	19929	JENNA B. CONAWAY			[REDACTED]		
7/31/2019	18976	MARCIE BRIMER			[REDACTED]		
7/31/2019	19898	DAVID D. CROSS	2	2,130.00	[REDACTED] coordinate work on sanctions motion (0.5).	089828-0000001	57167442
8/1/2019	23662	REEMA S. ALI			[REDACTED]		
8/1/2019	23847	RUMBI KAMBASHA			[REDACTED]		
8/1/2019	17318	CAMERON ANDREW TEPFER	7	5,250.00	Confer with D. Cross regarding sanctions motion; draft sanctions motion; confer with J. Conaway regarding sanctions motion; confer with A. Halderman regarding sanctions motion.	089828-0000001	56994081

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8/13/2019	19929	JENNA B. CONAWAY	0.25	93.75	Coordinate with C. Tepfer regarding upcoming Motion for Fees and the invoices to be used as exhibits.	089828-0000001	57268976
8/13/2019	17318	CAMERON ANDREW TEPFER					
8/13/2019	23662	REEMA S. ALI					
8/13/2019	18976	MARCIE BRIMER					
8/15/2019	19972	JANE P. BENTROTT					
8/15/2019	19929	JENNA B. CONAWAY					
8/15/2019	23662	REEMA S. ALI					
8/16/2019	23662	REEMA S. ALI					
8/16/2019	19929	JENNA B. CONAWAY					
8/16/2019	19284	JOSEPH R. PALMORE					
8/16/2019	20386	ARVIND S. MIRIYALA					
8/17/2019	23662	REEMA S. ALI					
8/19/2019	19929	JENNA B. CONAWAY					
8/19/2019	21110	JOHN P. CARLIN					
8/19/2019	19972	JANE P. BENTROTT					
8/19/2019	19284	JOSEPH R. PALMORE					
8/19/2019	23662	REEMA S. ALI					
8/19/2019	18976	MARCIE BRIMER					
8/19/2019	20386	ARVIND S. MIRIYALA					
8/20/2019	18976	MARCIE BRIMER					

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Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
8/20/2019	20403	AUSTIN MICHAEL UHLER					
8/20/2019	23662	REEMA S. ALI					
8/20/2019	19972	JANE P. BENTROTT					
8/20/2019	19929	JENNA B. CONAWAY					
8/20/2019	21110	JOHN P. CARLIN					
8/21/2019	21110	JOHN P. CARLIN					
8/21/2019	23662	REEMA S. ALI					
8/21/2019	20403	AUSTIN MICHAEL UHLER					
8/21/2019	20386	ARVIND S. MIRIYALA					
8/21/2019	18976	MARCIE BRIMER					
8/22/2019	20386	ARVIND S. MIRIYALA					
8/22/2019	22723	TOM DUGGAN					
8/22/2019	20403	AUSTIN MICHAEL UHLER					
8/22/2019	21110	JOHN P. CARLIN					
8/22/2019	23662	REEMA S. ALI					
8/23/2019	23662	REEMA S. ALI					
8/23/2019	20403	AUSTIN MICHAEL UHLER					
8/24/2019	20403	AUSTIN MICHAEL UHLER					
8/24/2019	21110	JOHN P. CARLIN					
8/25/2019	21110	JOHN P. CARLIN					
8/25/2019	20403	AUSTIN MICHAEL UHLER					
8/25/2019	23662	REEMA S. ALI					
8/26/2019	20403	AUSTIN MICHAEL UHLER					

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8/26/2019	19929	JENNA B. CONAWAY					
8/26/2019	23662	REEMA S. ALI					
8/26/2019	20386	ARVIND S. MIRIYALA					
8/26/2019	21110	JOHN P. CARLIN					
8/27/2019	21110	JOHN P. CARLIN					
8/27/2019	20386	ARVIND S. MIRIYALA					
8/27/2019	19929	JENNA B. CONAWAY					
8/27/2019	20403	AUSTIN MICHAEL UHLER					
8/27/2019	23662	REEMA S. ALI					
8/28/2019	19929	JENNA B. CONAWAY					
8/28/2019	20403	AUSTIN MICHAEL UHLER					
8/28/2019	23662	REEMA S. ALI					
8/28/2019	21941	MICHAEL STOLER	1.25	375	Search for attorney fee motions in N.D. Georgia for D. Cross.	089828-0000001	57211786
8/28/2019	19972	JANE P. BENTROTT					
8/28/2019	20386	ARVIND S. MIRIYALA					
8/29/2019	20386	ARVIND S. MIRIYALA					
8/29/2019	20386	ARVIND S. MIRIYALA					

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8/29/2019	20403						
8/29/2019	23662						
8/29/2019	19929						
8/30/2019	19929						
8/30/2019	19972						
8/30/2019	20403						
8/30/2019	20386						
8/31/2019	20403						
8/31/2019	23662						
9/2/2019	20403						
9/3/2019	20386						
9/3/2019	23662						
9/3/2019	20403						
9/4/2019	20403						