

**IN THE UNITED STATES COURT OF APPEALS
FOR VETERANS CLAIMS**

JEREMY BEAUDETTE AND)
MAYA BEAUDETTE,)
individually and on behalf of others)
similarly situated,)
Petitioners,)
v.)
DENIS McDONOUGH,)
in his capacity as)
Secretary of Veterans Affairs,)
Respondent.)

Vet. App. No. 20-4961

**APPELLANT’S APPLICATION FOR AWARD OF REASONABLE
ATTORNEYS’ FEES AND EXPENSES PURSUANT TO 28 U.S.C. § 2412(d)**

Pursuant to the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d), and U.S. Vet. App. Rule 39, Petitioners Jeremy Beaudette and Maya Beaudette apply for an award of reasonable attorneys' fees and expenses in the amount of **\$ 431,647.79.**

I. PROCEDURAL BACKGROUND

A. The VA Proceedings Below

Petitioner Jeremy Beaudette served in the Marine Corps from 2002 to 2012, including five combat tours in Iraq and Afghanistan. *See* Appx1217.¹ Multiple concussions during his combat tours caused Traumatic Brain Injury (“TBI”) and rendered him legally blind. Appx1229-1231. Upon medical discharge, VA rated Jeremy 100% disabled and found him in need of ‘aid and attendance’ benefits. Appx1067-1068.

Jeremy and his wife, Maya, (together, the “Beaudettes”) applied for Caregiver Program benefits in March 2013. Appx66. The VA found them eligible for the program based on a finding of Jeremy’s inability to perform activities of daily living and his substantial need for supervision and protection, including assistance with a variety of routine personal and household tasks. Appx1200-1240. The Beaudettes remained on the Caregiver Program for over four years.

In February 2018, VA informed the Beaudettes that they were no longer eligible for Caregiver Program benefits. Appx693. The Beaudettes challenged VA’s determination under VHA’s two-level internal appeals process. Appx36-43; Appx46-47. The first-level reviewer—the Caregiver Program manager at the VA Southern Nevada

¹ All record citations refer to the joint appendix filed with the Federal Circuit in *Beaudette v. McDonough*, Appeal No. 22-1264.

Healthcare System—denied the Beaudettes’ appeal in July 2018. Appx44-45. The reviewer stated only that “discharge from the [Caregiver Program] was clinically and administratively appropriate.” *Id.* The Beaudettes sought reconsideration of this decision by a second-level reviewer in September 2018. Appx46-47. That reviewer—the Director of the Sierra Pacific Veterans Integrated Service Network (“VISN”)—denied the Beaudettes’ appeal in November 2018. Appx48-49. The VISN Director based his decision on Jeremy’s inability “to come to the program for a full evaluation at the time of [the October 2017] review.” *Id.*

The Beaudettes sought to appeal the VHA denial-of-benefits decision to the Board on August 12, 2019, Appx1267-1273, but did not receive a response, Appx3.

B. This Court’s Mandamus and Class Certification Decision

On July 15, 2020, the Beaudettes filed a petition for a writ of mandamus with this Court seeking an order declaring the Secretary’s prohibition of Board review of benefit decisions under the Caregiver Program to be contrary to law, ordering the Secretary to allow Board review of their claims, and enjoining the Secretary from denying Board review of future decisions under the Caregiver Program. Appx50-76. The Beaudettes also sought to certify a class of similarly situated veterans and caregivers. *Id.*

On April 19, 2021, this Court granted the Beaudettes’ petition, issued “a writ of mandamus ordering the Secretary to begin notifying claimants of their right to appeal adverse Caregiver Program determinations to the Board of Veterans’ Appeals,” and certified a class. Appx2. The Court found that “[t]he Beaudettes have established an

indisputable right to Board review, the lack of an adequate administrative means of securing that right, and the propriety of extraordinary relief in these circumstances,” and also have “satisfied each of the prerequisites for class certification.” Appx7; Appx10.

The Court found the “purported reference in section 1720G [of the Caregiver Act] to VA’s longstanding rule that a ‘medical determination’ is not appealable” insufficient “to overcome broad reach of the Veterans’ Judicial Review Act [VJRA] and the strong presumptions in favor of reviewability of agency action and against implicit repeals of statutes.” Appx2. The Court disagreed with VA’s contention that Congress stripped the Board and this Court of jurisdiction through use of the term “medical determination” in 38 U.S.C. § 1720G. Appx5-6. This Court found that “the plain language of section 1720G(c)(1) does not insulate the Caregiver Program from [Board review and subsequent] judicial review.” Appx5. As the Court noted, Congress “certainly knew how to clearly limit the jurisdiction of this Court when it passed the Caregiver Program statute” and had done so in a similar context—the VA MISSION Act at 38 U.S.C. § 1703(f)—but not in section § 1720G. Appx6.

Finding that the plain language of the Caregiver Program statute does not support the Secretary’s interpretation, the Court turned to applicable canons of statutory interpretation and found that they confirmed the court’s construction of section 1720G. *Id.* The Court found that the Caregiver Program statute does not contain “clear and convincing evidence” of an intent to bar judicial review. The Court also found no evidence to support the Secretary’s argument that Congress silently ratified VA’s

construction of § 1720G, and “displace[d] the ordinary scope of the VJRA,” especially given the strong presumption against repeals by implication. *Id.*

The Court specifically (and “with confidence”) rejected the Secretary’s interpretation of § 1720G:

Of the potentially correct readings of section 1720G(c)(1), the Secretary’s is not one. It would take the extraordinary step of limiting the regular operation of the VJRA and foreclosing judicial review despite the absence of a clearly expressed congressional intent to do so. We can say with confidence that VA’s interpretation does not meet the high standard for wholly stripping the Board, and thus this Court, of jurisdiction over Caregiver Program determinations.

Appx7-8.

Judge Falvey dissented. *See* Appx11.

The Secretary requested review of the order by the entire Court. The Court denied the Secretary’s motion for full-court review on August 2, 2021, Appx1367, and entered judgment on October 6, 2021, Appx1.

C. The VA’s Implementation of the Veterans Court’s Order

The Court’s April 19, 2021 order also granted the Beaudettes’ motion to certify a class. Appx8-11. The Court certified a class of “claimants who received an adverse -2- benefits decision under the Caregiver Program, exhausted the administrative review process within the VHA, and have not been afforded the right to appeal to the [Board].” Appx11. As to class notice, upon finding that “VA has had a widespread practice of informing veterans, by mail, that Caregiver Program benefits decisions may not be appealed to the Board,” the Court concluded the Secretary should “send members of the

proposed class an updated benefits decision notice.” Appx11. The Court also ordered that “within 45 days of the date of this order the parties jointly prepare and submit to the Court for approval a plan to provide notice to members of the proposed class of (1) their right to appeal Caregiver benefits decisions to the Board and (2) the procedure for obtaining Board review of the decision.” Appx11.

The parties conferred at length on these issues, and jointly submitted a Joint Notice Plan to the Court, which was designed to provide notice to claimants of their right to appeal Caregiver benefits decisions to the Board, on August 5, 2021. Appx1368-1385. The Court approved the Joint Notice Plan on August 19, 2021. Appx1386-1390.

As part of a notice plan jointly devised by the parties, as of December 11, 2023, the VA has sent 443,728 notices to veterans and caregivers who at any time applied to the Caregiver Program of their right to appeal to the Board of Veterans’ Appeals. *See* Appeal No. 22-1264, Docket No. 75 at 2 (Fed. Cir. Dec. 13, 2023). The VA has created a website describing the appeals process and providing links to the necessary forms, including forms it created specifically to implement the Veterans Court’s decision.² As a result, veterans and caregivers have appealed PCAFC decisions to the Board. As of December 11, 2023, the Board has received 5,192 Caregiver Program appeals and has issued 1,134 dispositions on appeals of those decisions. *See* Appeal No. 22-1264, Docket No. 75 at 2-3 (Fed. Cir. Dec. 13, 2023).

² *See* U.S. Dep’t of Veterans Affairs, “VA Caregiver Support Program: PCAFC Decisions—Options for Further Review and Appeal,” https://www.caregiver.va.gov/support/PCAFC_Appeals.asp.

D. The Federal Circuit's Decision

The Secretary appealed this Court's decision to the Federal Circuit. The appeal was fully briefed on February 16, 2023. The Federal Circuit heard argument on December 6, 2023. The Court also ordered post-argument supplemental briefing by both parties.

On February 27, 2024, the Federal Circuit issued a precedential opinion affirming this Court's grant of the petition for a writ of mandamus. *Beaudette v. McDonough*, 93 F.4th 1361 (Fed. Cir. 2024). The Federal Circuit unanimously held that Congress did not intend to preclude Board or judicial review of eligibility decisions under the Caregiver Program, aside from a narrow category of discretionary decisions "on the furnishing of assistance or support." 93 F.4th at 1366-68. The Federal Circuit also rejected the VA's reliance on its prior regulation, holding that, by its own terms, the regulation did not bar review outside of this narrow category. 93 F.4th at 1368-69. As a result, the Federal Circuit held that "the Beaudettes and other similarly situated veterans and caregivers have an indisputable right to judicial review of Caregiver Program decisions that do not affect the furnishing of support or assistance." 93 F.4th at 1369. Finally, the Federal Circuit rejected the Secretary's argument that this Court did not have authority to issue a writ of mandamus. The Federal Circuit held that "the Beaudettes had no adequate alternative means to obtain the relief requested and the Veterans Court properly issued a writ of mandamus." 93 F.4th at 1370.

The Secretary did not seek *en banc* or certiorari review of the Federal Circuit's

decision. The Federal Circuit issued its mandate on April 19, 2024.

II. ARGUMENT

A. **Petitioners are a Prevailing Party and Eligible to Receive an Award.**

Under 28 U.S.C. § 2412(d), a court shall award to a prevailing party fees and other expenses incurred by that party in any civil action, including proceedings for judicial review of agency action. To obtain “prevailing party” status, a party need only to have obtained success “on any significant issue in litigation which achieve[d] some of the benefit ... sought in bringing the suit.” *Shalala v. Schaefer*, 509 U.S. 292, 302 (1993) (quoting *Texas State Teachers Assn. v. Garland Indep. Sch. Dist.*, 489 U.S. 782, 791-92 (1989)).

In this case, Petitioners are a prevailing party entitled to an award of fees and costs because the Court granted their petition for a writ of mandamus “ordering the Secretary to begin notifying claimants of their right to appeal adverse Caregiver Program determinations to the Board of Veterans’ Appeals.” Appx2. The Court also certified, based on Petitioners’ request, a class of “claimants who received an adverse -2- benefits decision under the Caregiver Program, exhausted the administrative review process within the VHA, and have not been afforded the right to appeal to the [Board].” Appx11. The Federal Circuit affirmed this Court’s decision to grant the petition for a writ of mandamus. *Beaudette v. McDonough*, 93 F.4th 1361, 1370 (Fed. Cir. 2024). (The Secretary did not appeal the Court’s decision to certify a class.) The Court-ordered relief creates the “material alteration of the legal relationship of the parties’ necessary to permit an award of attorney’s fees.” *Buckhannon Bd. & Care Home, Inc. v. West*

Virginia Dep't of Health and Human Res., 532 U.S. 598, 604 (2001) (quoting *Garland Indep. Sch. Dist.*, 489 U.S. at 792).

The court's ruling is of wide-reaching significance. The decision potentially affects over 400,000 veterans and caregivers denied benefits under the Caregiver Program, as well as any veterans and caregivers who will seek such benefits in the future. By December 2023, the VA sent out over 440,000 notices to veterans and their caregivers that they had a right to appeal an adverse Caregiver Program decision, and almost 14,000 veterans and their caregivers had either appealed a Caregiver Program decision or submitted a supplemental claim or request for higher-level review.

Appellant is a party eligible to receive an award of reasonable fees and expenses because the Beaudettes' net worth did not exceed \$2 million (two million dollars) at the time this civil action was filed. As an officer of the Court, the undersigned counsel hereby states that the Beaudettes' net worth did not exceed \$2 million (two million dollars) at the time this civil action was filed, nor did they own any unincorporated business, partnership, corporation, association, unit of local government, or organization, of which the net worth exceeded \$7 million (seven million dollars) and which had more than 500 employees. *See Bazalo v. Brown*, 9 Vet. App. 304, 309, 311 (1996).

B. The Position of the Secretary Was Not Substantially Justified.

The Secretary can defeat Petitioners' application for fees and costs only by demonstrating that the government's position was substantially justified. *See Brewer v. Am. Battle Monument Comm'n*, 814 F.2d 1564, 1566-67 (Fed. Cir. 1987); *Stillwell v.*

Brown, 6 Vet. App. 291, 301 (1994). The U.S. Supreme Court has held that for the position of the government to be substantially justified, it must have a “reasonable basis both in law and fact.” *Pierce v. Underwood*, 487 U.S. 552, 565 (1988); accord *Beta Sys. v. United States*, 866 F.2d 1404, 1406 (Fed. Cir. 1989).

In this case, the Secretary’s administrative and litigation positions were not substantially justified. As described above, this Court rejected the Secretary’s interpretation of the Caregiver Program statute, 38 U.S.C. § 1720G. As the Court explained, the Secretary’s statutory construction is not among “the potentially correct readings of section 1720G(c)(1),” and “does not meet the high standard for wholly stripping the Board, and thus this Court, of jurisdiction over Caregiver Program determinations.” Appx7-8. The Court then issued the extraordinary writ of mandamus to the Secretary, finding that “. The Beaudettes have established an indisputable right to Board review, the lack of an adequate administrative means of securing that right, and the propriety of extraordinary relief in these circumstances.” Appx7. The Court held that Caregiver Program claimants are entitled to seek review at the Board, ordering the Secretary to allow Petitioners to appeal their Caregiver Program claim to the Board, and enjoining the Secretary from denying Board review of future benefits decisions under the Caregiver Program. Appx11. The Court then denied the Secretary’s motion for full-court review. Appx1367.

The Federal Circuit unanimously affirmed this Court’s decision, rejecting all of the Secretary’s argument. As noted above, the Federal Circuit held that Congress did not

intend to preclude Board or judicial review of eligibility decisions under the Caregiver Program, aside from a narrow category of discretionary decisions “on the furnishing of assistance or support.” 93 F.4th at 1366-68. The court of appeals then rejected the Secretary’s reliance on its prior regulation, holding that, by its own terms, the regulation did not bar review outside of this narrow category. *Id.* at 1368-69. And the Federal Circuit rejected the Secretary’s argument that this Court did not have authority to issue a writ of mandamus. *Id.* at 1370.

C. Itemized Statement of Services Rendered and Amounts of Reasonable Fees and Expenses.

An itemized statement of the services rendered and the reasonable fees and expenses for which Petitioners seek compensation is attached to this application as Exhibit A. Included in Exhibit A is a certification that lead counsel has “(1) reviewed the combined billing statement and is satisfied that it accurately reflects the work performed by all counsel and (2) considered and eliminated all time that is excessive or redundant.” *Baldrige v. Nicholson*, 19 Vet. App. 227, 240 (2005). In the exercise of billing judgment, Appellant has eliminated **76.8** hours of attorney time and **0.5** hours of paralegal and research assistant time from this itemized statement and this fee petition.³

Appellant seeks attorneys’ fees at the following rates for representation in the Court of Appeals for Veterans Claims and the Court of Appeals for the Federal Circuit:⁴

³ There were also additional attorney, paralegal, and research assistant hours that were entirely excluded from this application.

⁴ A rate in excess of \$125 per hour for the attorneys for Appellant in this case is justified based on the increase in the cost of living since the EAJA was amended in March 1996.

See 28 U.S.C. § 2412(d)(2)(A)(ii). A rate in excess of \$125 per hour for the attorneys for Appellant in this case is justified based on the increase in the cost of living since the EAJA was amended in March 1996. *See* 28 U.S.C. § 2412(d)(2)(A)(ii). The \$125 attorney fee rate, adjusted for inflation for the **Washington Metropolitan Area**, was \$208.95 in 2019, \$210.82 in 2020, \$219.17 in 2021, \$233.68 in 2022, and \$239.01 in 2023, the years over which litigation took place in this case. *See* Bureau of Labor Statistics Data, CPI-U (Exhibit B). The rates were calculated by using the CPI-U for the Washington-Arlington-Alexandria, DC-VA-MD-WV area adjusted for inflation between March 1996 and the annual CPI-U for the years 2019, 2020, 2021, 2022, and 2023. *See* Exhibit B; *Mannino v. West*, 12 Vet. App. 242 (1999). Related to the work of D. Scott Carlton, Michael J. Fisher, Eleanor K. Mercado, Emma C. O'Hanlon, the \$125 attorney fee rate adjusted for inflation for **Los Angeles, California** was \$221.37 in 2020, \$229.85 in 2021, \$246.97 in 2022, and \$255.55 in 2023, the years over which litigation took place in this case. *See* Exhibit B. The rates were calculated by using the CPI-U for the Los Angeles-Long Beach-Anaheim, CA area adjusted for inflation between March 1996 and the annual CPI-U for the years 2020, 2021, 2022, and 2023. *See* Exhibit B; *Mannino*, 12 Vet. App. at 242. Related to the work of Sean Unger, Anuva V. Ganapathi, and Abigail H. Wald, the \$125 attorney fee rate adjusted for inflation for **San Francisco, California** was \$241.17 in 2019, \$245.33 in 2020, \$253.21 in 2021, and \$267.38 in 2022, the years over which litigation took place in this case. *See* Exhibit B. The rates were calculated by using the CPI-U for the San Francisco-Oakland-Hayward, CA area adjusted for inflation between March 1996 and the annual CPI-U for the years 2019, 2020, 2021, and 2022. *See* Exhibit B; *Mannino*, 12 Vet. App. at 242. Related to the work of Justin T. Fleischacker, Kurt W. Hansson, Yael Hopkovitz, Barry G. Sher, and Jake A. Silvers, the \$125 attorney fee rate adjusted for inflation for **New York, New York** was \$208.83 in 2019, \$212.40 in 2020, \$219.45 in 2021, \$232.84 in 2022, and \$241.74 in 2023, the years over which litigation took place in this case. *See* Exhibit B. The rates were calculated by using the CPI-U for the New York-Newark-Jersey City, NY-NJ-PA area adjusted for inflation between March 1996 and the annual CPI-U for the years 2019, 2020, 2021, 2022, and 2023. *See* Exhibit B; *Mannino*, 12 Vet. App. at 242. Related to the work of Andy LeGolvan, the \$125 attorney fee rate adjusted for inflation for **San Diego, California** was \$232.62 in 2019, \$236.12 in 2020, \$248.42 in 2021, and \$267.57 in 2022, the years over which litigation took place in this case. *See* Exhibit B. The rates were calculated by using the CPI-U for the San Diego-Carlsbad, CA area adjusted for inflation between the annual March 1996 and the annual CPI-U for the years 2019, 2020, 2021, and 2022. *See* Exhibit B; *Mannino*, 12 Vet. App. at 242. The market rates for Appellant's attorneys exceeded the requested rates per hour during the relevant time period. *See Covington v. District of Columbia*, 839 F. Supp. 894, 904–05 (D.D.C. 1993), *aff'd*, 58 F.3d 1101 (D.C. Cir. 1995). The prevailing market rate for the work done by paralegals and law clerks was at least \$173.00 from June 1, 2019, to May 31, 2020, and at least \$180.00 from June 1, 2020, to the present. *See* USAO Attorney's Fees Matrix, 2015-2021

<u>Name</u>	<u>Rate</u>	<u>Hours</u>	<u>Fee Amount</u>
Barton F. Stichman	\$219.17	23.90	\$5,238.16
(1974 law graduate)	\$233.68	15.70	\$3,668.78
	\$239.01	14.20	\$3,393.94
Kurt W. Hansson	\$212.40	0.25	\$53.10
(1986 law graduate)	\$219.45	0.50	\$109.73
Barry G. Sher	\$212.40	2.75	\$584.10
(1989 law graduate)	\$219.45	13.50	\$2,962.58
Stephen B. Kinnaird	\$239.01	6.00	\$1,434.06
(1994 law graduate)			
Andy Legolvan	\$232.62	202.25	\$47,047.40
(2001 law graduate)	\$236.12	376.50	\$88,899.18
	\$248.42	332.55	\$82,612.07
	\$267.57	25.00	\$6,689.25
Igor V. Timofeyev	\$233.68	136.75	\$31,955.74
(2001 law graduate)	\$239.01	83.50	\$19,957.34
	\$239.01	3.35	\$800.68
Sean Unger	\$245.33	5.50	\$1,349.32
(2003 law graduate)	\$253.21	9.50	\$2,405.50
	\$267.38	1.75	\$467.92
D. Scott Carlton	\$221.37	7.25	\$1,604.93
(2005 law graduate)	\$229.85	4.75	\$1,091.79
	\$246.97	13.25	\$3,272.35
Yael Hopkovitz	\$219.45	3.00	\$658.35

(Exhibit C) (“The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc.*, 572 F. Supp. 354 (D.D.C. 1983), *aff’d in part, rev’d in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore . . . area.”); *see also Sandoval v. Brown*, 9 Vet. App. 177, 181 (1996); *Richlin Sec. Serv. Co. v. Chertoff*, 553 U.S. 571 (2008).

(2007 law graduate)

Renee Burbank	\$219.17	30.00	\$6,575.10
(2009 law graduate)	\$233.68	20.10	\$4,696.97
	\$239.01	1.40	\$334.61
Amanda Pertusati	\$246.97	9.70	\$2,395.61
(2013 law graduate)	\$255.55	4.80	\$1,226.64
	\$255.55	0.40	\$102.22
Daniel Triplett Jr.	\$246.97	1.20	\$296.36
(2013 law graduate)			
Randall V. Johnston	\$208.95	16.25	\$3,395.44
(2013 law graduate)	\$210.82	51.50	\$10,857.23
	\$219.17	9.75	\$2,136.91
	\$233.68	1.00	\$233.68
Abigail H. Wald	\$241.17	4.00	\$964.68
(2015 law graduate)			
Alex T. Schulman	\$210.82	5.75	\$1,212.22
(2018 law graduate)			
Anderson Y. To	\$210.82	12.75	\$2,687.96
(2018 law graduate)			
Justin T. Fleischacker	\$241.74	1.00	\$241.74
(2018 law graduate)			
Jake A. Silvers	\$232.84	33.50	\$7,800.14
(2019 law graduate)			
Michael J. Fisher	\$221.37	37.25	\$8,246.03
(2019 law graduate)	\$229.85	9.75	\$2,241.04
	\$246.97	89.75	\$22,165.56
	\$255.55	1.00	\$255.55
Anuva V. Ganapathi	\$267.38	3.75	\$1,002.68
(2021 law graduate)			

Ryan Kelley (2021 law graduate)	\$239.01	4.80	\$1,147.25
Emma C. O'Hanlon (2022 law graduate)	\$229.85	32.00	\$7,355.20
Allison Doherty (paralegal)	\$180.00	9.00	\$1,620.00
Angela Nedd (paralegal)	\$180.00	2.90	\$522.00
Brianna LeFrere (paralegal)	\$180.00	0.10	\$18.00
C. Wendy Phinny (paralegal)	\$180.00	81.00	\$14,580.00
Courtney A. Hsieh (paralegal)	\$180.00	0.25	\$45.00
Elizabeth Elliott (paralegal)	\$180.00	2.00	\$360.00
Heather R. O'Dea (paralegal)	\$180.00	0.50	\$90.00
Irene Chang (paralegal)	\$180.00	2.00	\$360.00
James Jordan (paralegal)	\$173.00 \$180.00	22.75 82.25	\$3,935.75 \$14,805.00
Javii D. Austin (paralegal)	\$180.00	2.00	\$360.00
John Lund (paralegal)	\$180.00	6.25	\$1,125.00

WHEREFORE, Petitioners respectfully request that the Court award attorneys' fees and expenses in the total amount of **\$ 431,647.79.**

Date: June 26, 2024

Respectfully submitted,

/s/ Igor V. Timofeyev
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Counsel for Petitioners

CERTIFICATION

As lead counsel in this appeal, I have reviewed the combined billing statement attached as Exhibit A and I am satisfied that it accurately reflects the work performed by all counsel and I have considered and eliminated all time that is excessive or redundant.

/s/ Igor V. Timofeyev
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EXHIBIT A

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	9/12/2019	2.25	Andy Legolvan
	Conduct legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court		
Date:	9/13/2019	1.25	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court		
Date:	9/17/2019	4.00	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (2.0); draft outline of arguments (2.0)		
Date:	9/18/2019	5.75	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (3.0); further draft outline of arguments (2.75)		
Date:	9/19/2019	6.00	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (2.5); further draft outline of arguments (3.5); 0.5 eliminated in the exercise of billing judgment		
Date:	9/20/2019	6.75	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (3.0); further draft outline of arguments (3.5); phone call with Public Counsel regarding ongoing strategy (0.25); 1.0 eliminated in the exercise of billing judgment		
Date:	9/23/2019	5.50	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (1.5); further draft outline of arguments (3.0); draft writ petition (1.0)		
Date:	9/24/2019	7.75	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (2.75); further draft outline of arguments (2.0); draft writ petition (2.0)		
Date:	9/25/2019	8.00	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (2.5); further draft outline of arguments (1.5); further draft writ petition (4.0)		
Date:	9/26/2019	8.00	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (2.0); further draft outline of arguments (2.5); draft writ petition (3.5)		
Date:	9/27/2019	2.25	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (0.75); further draft writ petition (1.5)		
Date:	9/30/2019	3.25	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (0.5); further draft writ petition (2.75)		
Date:	10/1/2019	1.50	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court (0.5); further draft writ petition (1.0)		
Date:	10/2/2019	6.50	Andy Legolvan
	Conduct further legal research and analysis regarding possible strategy for filing emergency writ petition in the Veterans Court; further draft writ petition; email correspondence with Public Counsel and veterans organizations regarding possible amicus briefs		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	10/2/2019	0.25	Randall V. Johnston
	Correspond with A. Legolvan regarding preparation of writ petition		
Date:	10/3/2019	1.00	Andy Legolvan
	Prepare for and attend phone call with Public Counsel and Luke Miller to discuss amicus brief strategy for writ petition		
Date:	10/4/2019	1.25	Andy Legolvan
	Phone call with Public Counsel regarding amicus strategy and phone call with counsel for DAV regarding same (0.5); conduct further legal research regarding petition strategy (0.75)		
Date:	10/7/2019	2.25	Andy Legolvan
	Phone call with Public Counsel regarding writ petition (0.75); further draft petition for review (1.5)		
Date:	10/7/2019	0.75	Randall V. Johnston
	Teleconference with Public Counsel, A. Legolvan regarding writ petition (0.75); 0.25 eliminated in the exercise of billing judgment		
Date:	10/8/2019	0.50	Andy Legolvan
	Email with Public Counsel regarding petition draft and amicus briefs		
Date:	10/8/2019	0.25	Randall V. Johnston
	Correspond with A. Legolvan regarding amici briefs in support of writ petition		
Date:	10/9/2019	0.25	Andy Legolvan
	Email with Public Counsel regarding petition draft and amicus briefs		
Date:	10/9/2019	0.25	Randall V. Johnston
	Correspond with A. Legolvan, P. Clamurro, A. Pertusati regarding potential amicus partners		
Date:	10/10/2019	1.50	Andy Legolvan
	Teleconference with Public Counsel and NVLSP regarding writ petition draft and amicus briefs		
Date:	10/10/2019	1.50	Randall V. Johnston
	Teleconference with A. Legolvan, Public Counsel, and NVLSP regarding litigation strategy concerning writ petition and potential amicus brief		
Date:	10/11/2019	0.50	Andy Legolvan
	Phone call with R. Johnston regarding litigation strategy for writ petition		
Date:	10/11/2019	0.50	Randall V. Johnston
	Call with A. Legolvan regarding litigation strategy for writ petition		
Date:	10/16/2019	0.75	Randall V. Johnston
	Review draft class petition		
Date:	10/17/2019	0.25	Randall V. Johnston
	Correspond with A. Legolvan regarding class petition		
Date:	10/18/2019	3.50	Andy Legolvan
	Prepare for and attend phone call with Swords to Plowshares for potential amicus brief (0.5); further draft writ petition (3.0)		
Date:	10/18/2019	0.25	Randall V. Johnston
	Review correspondence regarding amicus briefs		
Date:	10/21/2019	1.25	Andy Legolvan
	Prepare for and attend phone call with Public Counsel regarding writ petition and amicus effort		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	10/21/2019	0.25	Randall V. Johnston
	Correspond regarding amicus brief outreach		
Date:	10/22/2019	0.25	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	10/23/2019	0.25	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	10/24/2019	7.00	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	10/24/2019	0.25	Randall V. Johnston
	Conference with A. Legolvan regarding class action brief		
Date:	10/25/2019	5.00	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	10/25/2019	0.25	Randall V. Johnston
	Teleconference with A. Legolvan regarding class petition		
Date:	10/28/2019	1.00	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	10/29/2019	2.00	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	10/30/2019	3.25	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims (2.0); phone call with Inner City Law Center regarding amicus brief (1.25)		
Date:	10/30/2019	1.25	Randall V. Johnston
	Teleconference with Paul Hastings, Public Counsel, Inner City Law Center regarding amicus effort		
Date:	10/31/2019	6.50	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims (5.0); phone call with Veterans Consortium regarding amicus brief (1.5)		
Date:	10/31/2019	1.50	Randall V. Johnston
	Teleconference with Paul Hastings, Public Counsel, Veterans Consortium regarding amicus briefs		
Date:	11/4/2019	1.50	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims (1.0); phone call with Public Counsel regarding litigation strategy for petition for mandamus (0.5)		
Date:	11/4/2019	0.50	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	11/5/2019	4.50	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/5/2019	0.25	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	11/6/2019	7.75	Andy Legolvan
	Further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/6/2019	0.50	Randall V. Johnston
	Teleconference regarding amicus brief		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	11/7/2019	0.25	Randall V. Johnston
	Review correspondence regarding Beaudette rating decision		
Date:	11/8/2019	0.25	Randall V. Johnston
	Review correspondence from A. Pertusati regarding amicus filers		
Date:	11/12/2019	7.00	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/12/2019	0.25	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	11/13/2019	7.75	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/13/2019	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	11/14/2019	8.00	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/15/2019	7.25	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/18/2019	7.25	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/19/2019	7.50	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/19/2019	1.00	Randall V. Johnston
	Teleconference regarding amicus briefs		
Date:	11/20/2019	4.25	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/20/2019	0.25	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	11/21/2019	7.25	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims (6.5); phone call with Public Counsel and PVA regarding amicus brief (0.5); email correspondence with PVA regarding amicus brief (0.25)		
Date:	11/21/2019	1.50	Randall V. Johnston
	Teleconference and correspondence regarding amicus briefs		
Date:	11/22/2019	5.50	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	11/22/2019	0.25	Randall V. Johnston

Date:	Work Date	Hours Worked	Timekeeper Name
	Correspond regarding amicus briefs		
Date:	11/25/2019	5.25	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims (3.75); phone call with NVLSP regarding amicus briefs (1.5)		
Date:	11/25/2019	1.50	Randall V. Johnston
	Teleconference with NVLSP regarding amicus briefs and strategy for litigation		
Date:	11/26/2019	6.00	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	12/2/2019	0.75	Andy Legolvan
	Conference call with Public Counsel regarding ongoing litigation strategy		
Date:	12/6/2019	4.25	Andy Legolvan
	Conduct further legal research, further review of evidence, and further draft petition for mandamus and class relief to the US Court of Appeals for Veterans Claims		
Date:	12/16/2019	0.50	Abigail H. Wald
	Confer with A. Legolvan re petition for writ of mandamus and review same		
Date:	12/16/2019	5.00	Andy Legolvan
	Conference call with Public Counsel regarding ongoing litigation strategy (0.5); further draft petition for mandamus (4.5)		
Date:	12/17/2019	3.50	Abigail H. Wald
	Prepare petition for writ of mandamus		
Date:	12/23/2019	0.25	Randall V. Johnston
	Review correspondence regarding potential amicus brief		
Date:	1/9/2020	0.25	Randall V. Johnston
	Review correspondence regarding amicus briefs		
Date:	1/10/2020	0.25	Randall V. Johnston
	Review correspondence related to amicus briefs		
Date:	1/13/2020	1.50	Randall V. Johnston
	Conference and correspond with A. Pertusati regarding litigation strategy and amicus briefs		
Date:	2/25/2020	1.75	Randall V. Johnston
	Review and edit petition for mandamus		
Date:	4/15/2020	2.25	Andy Legolvan
	Review and analyze Tapia opinion the court of federal claims and Tapia federal circuit docket to determine impact on writ petition (0.5); further draft class petition (1.25); phone call with R. Johnston regarding mandamus petition and ongoing strategy (1.0)		
Date:	4/15/2020	2.25	Randall V. Johnston
	Prepare comments on petition (1.75); correspond and conference with S. Carlton, A. Legolvan regarding same (0.5)		
Date:	4/16/2020	0.75	Randall V. Johnston
	Review and analyze mandamus petition		
Date:	4/17/2020	1.00	Andy Legolvan
	Phone call with S. Carlton and R. Johnston regarding the emergency class petition		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	4/17/2020	1.00	D. Scott Carlton
	Telephone conference regarding revisions to mandamus petition and comments to class complaint		
Date:	4/17/2020	1.25	Randall V. Johnston
	Conference with S. Carlton, A. Legolvan regarding mandamus and class petition (1.0); preparation for and follow up regarding same (0.25)		
Date:	5/1/2020	0.75	James Jordan
	Research federal and local US Court of Appeals for Veteran Claims rules re Rule 21 and 32 for upcoming petition.		
Date:	5/1/2020	0.25	James Jordan
	Research local US Court of Appeals for Veterans Claims rules regarding appearance requirements		
Date:	5/1/2020	0.50	Randall V. Johnston
	Correspond with A. Legolvan, A. Dragon regarding preparation of petition		
Date:	5/11/2020	1.00	Andy Legolvan
	Further review and revise class petition to the Court of Appeals for Veterans Claims		
Date:	5/11/2020	2.50	Randall V. Johnston
	Prepare mandamus petition (2.25); correspond with S. Carlton, A. Legolvan regarding same (0.25)		
Date:	5/12/2020	0.25	Andy Legolvan
	Further review and revise class petition to the Court of Appeals for Veterans Claims		
Date:	5/12/2020	5.00	James Jordan
	Organize potential exhibits to Rule 21 petition for writ mandamus brief.		
Date:	5/12/2020	0.75	Randall V. Johnston
	Correspondence regarding draft of petition		
Date:	5/13/2020	0.25	Andy Legolvan
	Email correspondence with Paul Hastings team regarding preparation and status of mandamus petition		
Date:	5/13/2020	5.00	James Jordan
	Continue organization of potential exhibits to Rule 21 petition for writ of mandamus		
Date:	5/13/2020	0.25	Randall V. Johnston
	Review correspondence from A. Legolvan regarding Tapia case for mandamus petition		
Date:	5/14/2020	4.00	James Jordan
	Proofread including fact and legal authority cite checking of petition for writ of mandamus		
Date:	5/15/2020	3.50	James Jordan
	Complete fact and legal authority cite checking of petition for writ of mandamus		
Date:	5/21/2020	1.00	Andy Legolvan
	Review and revise class petition to CAVC (0.75); email correspondence with Public Counsel regarding same (0.25)		
Date:	5/23/2020	2.00	Andy Legolvan
	Review and revise CAVC petition		
Date:	5/23/2020	1.00	Barry G. Sher
	Review petition for mandamus (0.75); email with team regarding same (0.25)		
Date:	5/23/2020	0.50	Randall V. Johnston
	Correspond with B. Sher, A. Legolvan regarding CAVC petition		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	5/24/2020	3.25	Andy Legolvan
	Review and revise CAVC petition		
Date:	5/24/2020	0.50	Randall V. Johnston
	Review correspondence from B. Sher, A. Legolvan regarding CAVC petition		
Date:	5/25/2020	0.25	Randall V. Johnston
	Correspond with S. Carlton, A. Legolvan regarding CAVC petition		
Date:	5/26/2020	7.25	Andy Legolvan
	Conduct further legal research and analysis and further draft CAVC petition		
Date:	5/26/2020	0.25	James Jordan
	Review comments from team on CAVC petition		
Date:	5/26/2020	0.25	Randall V. Johnston
	Review correspondence regarding CAVC petition		
Date:	5/27/2020	1.50	James Jordan
	Research local rules regarding motions to seal and redaction of personal identifying information in light of soon to be filed petition for writ brief (1.0); draft memorandum to team in light of same (0.5)		
Date:	5/27/2020	0.25	James Jordan
	Review additional comments from team on CAVC petition		
Date:	5/27/2020	0.25	Randall V. Johnston
	Review correspondence regarding CAVC petition		
Date:	5/28/2020	2.25	James Jordan
	Reorganize exhibits in support of petition for writ brief including resizing PDFs due to 30MB CM/ECF filing specification.		
Date:	5/29/2020	1.00	Andy Legolvan
	Review and analyze further edits to CAVC petition and memorandum prepared by Public Counsel regarding reply brief		
Date:	5/29/2020	1.00	D. Scott Carlton
	Review and revise CAVC petition		
Date:	5/29/2020	0.50	Randall V. Johnston
	Review correspondence regarding CAVC petition		
Date:	6/1/2020	4.50	Andy Legolvan
	Further draft CAVC petition		
Date:	6/1/2020	0.50	Randall V. Johnston
	Correspondence regarding petition and case law		
Date:	6/2/2020	0.50	Randall V. Johnston
	Correspond with PH, PC team regarding petition		
Date:	6/3/2020	0.25	Randall V. Johnston
	Review correspondence related to CAVC petition and amici briefs		
Date:	6/5/2020	1.00	D. Scott Carlton
	Attention to amicus issues and revised CAVC petition		
Date:	6/5/2020	1.00	Randall V. Johnston
	Correspondence regarding CAVC petition		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	6/6/2020	2.25	Andy Legolvan
	Conduct further legal research and review and revise CAVC petition		
Date:	6/6/2020	0.25	James Jordan
	Confer with team regarding logistics of potential petition filing		
Date:	6/6/2020	1.25	Randall V. Johnston
	Correspond regarding CAVC petition		
Date:	6/7/2020	2.75	Andy Legolvan
	Conduct further legal research regarding potential amicus topics in preparation for upcoming call with NVLSP		
Date:	6/7/2020	0.25	Randall V. Johnston
	Review correspondence from A. Pertusati regarding call with NVLSP concerning amicus brief		
Date:	6/8/2020	5.75	Andy Legolvan
	Conduct further legal research for CAVC petition (2.0); further review and revise CAVC petition (3.75)		
Date:	6/8/2020	2.25	Andy Legolvan
	Prepare for and attend call with NVLSP regarding amicus brief		
Date:	6/8/2020	0.50	Heather R. O'Dea
	Research dockets in 2 Court of Appeals for Veterans Claims cases for CAVC petition		
Date:	6/8/2020	3.50	Randall V. Johnston
	Teleconference with NVLSP regarding amicus brief and preparation for and follow up regarding same (2.25); review and analyze CAVC petition (1.25)		
Date:	6/9/2020	3.25	Andy Legolvan
	Conduct further legal research regarding potential amicus topics raised by NVLSP and draft memorandum regarding same		
Date:	6/9/2020	3.25	Andy Legolvan
	Conduct legal research and analysis regarding petition in the Court of Appeals for the Federal Circuit and further draft petition		
Date:	6/9/2020	1.50	Andy Legolvan
	Further draft CAVC petition		
Date:	6/9/2020	0.50	Randall V. Johnston
	Correspondence regarding CAVC petition		
Date:	6/10/2020	1.50	Andy Legolvan
	Conduct further legal research and further draft CAVC petition (1.0); email correspondence with prospective amicus brief filers (0.5)		
Date:	6/10/2020	0.50	Randall V. Johnston
	Correspond regarding amicus briefs		
Date:	6/11/2020	1.25	Andy Legolvan
	Conduct further legal research and further draft CAVC petition (0.75); email correspondence with prospective amicus brief filers (0.5)		
Date:	6/11/2020	0.75	Randall V. Johnston
	Correspondence regarding amicus briefs and status of CAVC petition		
Date:	6/12/2020	1.25	Andy Legolvan
	Phone call with Public Counsel and Paul Hastings team regarding CAVC petition (1.); phone call with NVLSP regarding amicus support (0.25)		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	6/12/2020	1.00	D. Scott Carlton
	Telephone conference regarding amicus support for CAVC petition		
Date:	6/12/2020	1.00	Randall V. Johnston
	Teleconference with PH, Public Counsel regarding amicus support for CAVC petition (1.0); 0.5 eliminated in the exercise of billing judgment		
Date:	6/15/2020	0.50	Andy Legolvan
	Prepare for and attend call with prospective amicus filer, Swords to Plowshares (0.5); 0.25 eliminated in the exercise of billing judgment		
Date:	6/15/2020	0.50	Randall V. Johnston
	Conferences regarding amicus briefs		
Date:	6/16/2020	1.25	Andy Legolvan
	Email correspondence with VLC regarding potential amicus brief and review and analyze legal research regarding same		
Date:	6/16/2020	0.50	Randall V. Johnston
	Correspondence regarding petition and amicus briefs		
Date:	6/17/2020	2.25	Andy Legolvan
	Prepare for and attend phone call with VLC regarding potential amicus brief (0.75); review VA decision denying Beaudettes' claims (1.0); email correspondence with VLC regarding amicus brief (0.5)		
Date:	6/17/2020	1.50	Randall V. Johnston
	Teleconference with UC clinic, Paul Hastings, Public Counsel regarding amicus brief and follow up regarding same (0.75); review Beaudette decision and correspond with A. Legolvan, A. Pertusati regarding same (0.75)		
Date:	6/18/2020	0.25	Randall V. Johnston
	Correspondence regarding CAVC petition and amici briefs		
Date:	6/19/2020	0.75	D. Scott Carlton
	Review email correspondence regarding CAVC petition and amicus briefs and follow up regarding same		
Date:	6/19/2020	1.50	Randall V. Johnston
	Conference and correspondence with A. Legolvan, A. Pertusati regarding caregiver determinations and amicus briefs		
Date:	6/22/2020	0.25	Randall V. Johnston
	Review correspondence regarding amici briefs		
Date:	6/23/2020	0.25	Randall V. Johnston
	Review correspondence from A. Pertusati regarding amicus briefs and PCAFC claims		
Date:	6/24/2020	0.25	Andy Legolvan
	Email correspondence with USD VLC regarding amicus brief		
Date:	6/24/2020	0.25	Randall V. Johnston
	Correspondence regarding USD amicus brief		
Date:	6/25/2020	3.25	Andy Legolvan
	Prepare for and attend conference call with USD VLC regarding amicus brief (1.5); conduct further legal research regarding amicus issue and draft email correspondence to USD VLC regarding same (1.75)		
Date:	6/25/2020	1.25	Randall V. Johnston
	Teleconference with Paul Hastings, USD clinic regarding amicus brief and follow up regarding same		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	6/30/2020	0.25	Randall V. Johnston
	Review correspondence regarding amicus briefs		
Date:	7/1/2020	2.25	Andy Legolvan
	Email correspondence with NVLSP, Swords to Plowshares, and USD VLC regarding amicus briefs (0.75); review and revise email blast regarding amicus briefs (0.75); review and analyze CAFC rules regarding petition for review of VA regulations (0.75)		
Date:	7/1/2020	1.25	Randall V. Johnston
	Correspondence regarding amici briefs		
Date:	7/2/2020	0.50	Randall V. Johnston
	Correspondence regarding amici briefs		
Date:	7/6/2020	0.75	Randall V. Johnston
	Correspondence regarding amici briefs		
Date:	7/8/2020	2.25	Andy Legolvan
	Prepare for and attend call with Jenner Block to discuss amicus brief (0.75); call with NVLSP to discuss amicus brief (0.75); phone call with Paul Hastings team and Public Counsel team regarding amicus strategy (0.75)		
Date:	7/8/2020	3.00	Andy Legolvan
	Review and revise CAVC caregiver petition (Beaudettes)		
Date:	7/9/2020	2.50	Andy Legolvan
	Conduct further legal research and further review and revise CAVC caregiver petition (Beaudettes)		
Date:	7/9/2020	4.50	Andy Legolvan
	Review and analyze draft amicus brief from USD VLC and Public Counsel's comments and revisions to same; draft comments regarding same		
Date:	7/9/2020	1.25	James Jordan
	Send certain exhibits in support of Beaudette's extraordinary petition to Sidley Austin in preparation for amicus support		
Date:	7/9/2020	1.50	Randall V. Johnston
	Correspond and conference regarding amici briefs		
Date:	7/10/2020	0.50	Andy Legolvan
	Prepare for and attend phone call with Inner City law clinic to discuss amicus brief		
Date:	7/10/2020	1.75	Randall V. Johnston
	Correspond and conference with A. Legolvan, A. Pertusati, amicus brief counsel regarding amici briefs		
Date:	7/11/2020	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	7/12/2020	0.75	Randall V. Johnston
	Preparation for filing and correspondence with A. Legolvan, A. Pertuasati regarding same		
Date:	7/13/2020	-	Andy Legolvan
	2.25 eliminated in the exercise of billing judgment		
Date:	7/13/2020	0.50	Andy Legolvan
	Review and analyze CAVC rules in preparation for petition filings (0.5); 1.5 eliminated in the exercise of billing judgment		
Date:	7/13/2020	8.00	James Jordan
	Prepare appendix and table of contents for filing		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	7/14/2020	4.75	Andy Legolvan
	Further review and revise CAVC petition (Beaudettes)		
Date:	7/14/2020	1.25	Andy Legolvan
	Phone call with Beaudettes and Public Counsel regarding CAVC petition (0.75); phone call with David Daniels regarding upcoming petition filing (0.5)		
Date:	7/14/2020	8.50	James Jordan
	Prepare appendix and table of contents for filing		
Date:	7/14/2020	1.00	Randall V. Johnston
	Conference and correspond regarding filing of CAVC petition		
Date:	7/15/2020	1.00	Andy Legolvan
	Conduct legal research and analysis regarding potential claim for unreasonable delay to be asserted in amended petition (Beaudettes)		
Date:	7/15/2020	0.50	Andy Legolvan
	Email correspondence with various amicus filers regarding CAVC petition (Beaudettes) and appendix in support thereof		
Date:	7/15/2020	5.00	Andy Legolvan
	Review and finalize CAVC petition (Beaudettes) and appendix in support thereof in preparation for filing		
Date:	7/15/2020	0.50	Andy Legolvan
	Review and revise certificate of service for petition and appendix (CAVC - Beaudettes)		
Date:	7/15/2020	1.00	James Jordan
	Prepare copies of filed petition for co-counsel and other entities		
Date:	7/15/2020	1.00	Randall V. Johnston
	Correspondence regarding CAVC filing		
Date:	7/16/2020	2.50	Andy Legolvan
	Conduct further legal research and analysis regarding potential claim for unreasonable delay to be asserted in amended petition (Beaudettes)		
Date:	7/16/2020	0.50	Andy Legolvan
	Email correspondence with various amicus filers regarding docketing and case number for CAVC petition (Beaudettes) and appendix in support thereof		
Date:	7/16/2020	1.00	Randall V. Johnston
	Correspondence regarding petitions and amici briefs		
Date:	7/20/2020	3.00	Andy Legolvan
	Conduct legal research and analysis regarding Solze notice, and attend phone call with NVLSP regarding same, in preparation for drafting Solze notice in Beaudettes case (1.0); draft Solze notice (2.0)		
Date:	7/20/2020	1.75	Andy Legolvan
	Review and draft comments to ICLC amicus brief		
Date:	7/20/2020	5.50	James Jordan
	Preparation of Solze notice for filing including redaction of personal identifying information and filing.		
Date:	7/20/2020	1.00	Randall V. Johnston
	Review correspondence regarding amici briefs		
Date:	7/21/2020	2.50	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Further draft and finalize Solze notice regarding Beaudettes' petition in the CAVC, along with declaration and exhibits in support thereof
Date:	7/21/2020	2.25	Andy Legolvan
			Review and analyze NVLSP amicus brief, and phone call with counsel for NVLSP
Date:	7/21/2020	3.50	Andy Legolvan
			Review and draft comments to USD VLC amicus brief and phone call with Deva from USD regarding amicus brief
Date:	7/21/2020	3.25	James Jordan
			Complete Solze filing
Date:	7/21/2020	1.25	Randall V. Johnston
			Review draft amici briefs and correspond with A. Legolvan regarding same
Date:	7/22/2020	4.25	Andy Legolvan
			Phone call and email correspondence with various amicus filers regarding amicus briefs; review and further comment on draft amicus briefs prior to filing
Date:	7/22/2020	1.50	D. Scott Carlton
			Review petition and amicus briefs
Date:	7/22/2020	-	James Jordan
			3.25 eliminated in the exercise of billing judgment
Date:	7/22/2020	2.50	Randall V. Johnston
			Review and provide comments on USD brief and correspond and conference with A. Legolvan, D. Robbins regarding same
Date:	7/23/2020	1.75	Andy Legolvan
			Review and analyze finalized, filed amicus briefs in Beaudette/CAVC case
Date:	7/23/2020	-	Randall V. Johnston
			0.5 eliminated in the exercise of billing judgment
Date:	7/24/2020	-	Randall V. Johnston
			0.25 eliminated in the exercise of billing judgment
Date:	7/28/2020	0.25	Andy Legolvan
			Review court order submitting petition to panel of judges (Beaudette) (0.25); 0.5 eliminated in the exercise of billing judgment
Date:	7/31/2020	3.75	Andy Legolvan
			Conduct legal research and analysis regarding class certification in CAVC in preparation for drafting motion for class certification in Beaudette case; draft motion for class certification
Date:	8/3/2020	4.25	Andy Legolvan
			Conduct further legal research and analysis regarding class certification in CAVC in preparation for drafting motion for class certification in Beaudette case (1.75); draft motion for class certification (2.0); phone call and email correspondence with Public Counsel regarding class certification issues (0.5); 0.25 eliminated in the exercise of billing judgment
Date:	8/4/2020	0.50	Andy Legolvan
			Review and analyze court order regarding class certification (0.25); email correspondence with Paul Hastings team and Public Counsel regarding same (0.25); 1.0 eliminated in the exercise of billing judgment
Date:	8/5/2020	1.50	Andy Legolvan
			Phone call with Paul Hastings team regarding class certification strategy; email regarding same

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	8/5/2020	2.25	Michael J. Fisher
	Research strategy for establishing numerosity for proposed class definition		
Date:	8/6/2020	1.00	Michael J. Fisher
	Research strategy for establishing numerosity for proposed class definition		
Date:	8/7/2020	0.50	Andy Legolvan
	Email correspondence with team regarding further class certification strategy		
Date:	8/7/2020	1.50	Michael J. Fisher
	Call with Public Counsel partner attorney to strategize approach for class certification numerosity requirement. Research numerosity requirement		
Date:	8/7/2020	0.25	Randall V. Johnston
	Review correspondence from regarding preparation of class certification petition		
Date:	8/9/2020	2.00	Alex T. Schulman
	Prepared outline on CAVC class certification standards		
Date:	8/10/2020	4.50	Andy Legolvan
	Conduct legal research and analysis regarding class certification strategy for Beaudette petition (2.0); draft motion for class certification (2.5)		
Date:	8/10/2020	2.00	Michael J. Fisher
	Research strategy for establishing numerosity for proposed class definition; 0.5 eliminated in the exercise of billing judgment		
Date:	8/10/2020	0.25	Randall V. Johnston
	Review correspondence from A. Pertusati regarding NOD appeal		
Date:	8/11/2020	3.00	Alex T. Schulman
	Prepared outline on CAVC class certification standards		
Date:	8/11/2020	4.25	Andy Legolvan
	Conduct legal research and analysis regarding class certification strategy for Beaudette petition (1.25); draft motion for class certification (3.0)		
Date:	8/11/2020	0.50	Andy Legolvan
	Phone call with Public Counsel and Syracuse NY veterans clinic regarding class outreach		
Date:	8/11/2020	3.50	Michael J. Fisher
	Research strategy for establishing numerosity for proposed class definition		
Date:	8/11/2020	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	8/12/2020	6.75	Andy Legolvan
	Conduct further legal research and analysis regarding class certification strategy for Beaudette petition (1.75); further draft motion for class certification (5.0)		
Date:	8/13/2020	0.75	Anderson Y. To
	Research class action case law		
Date:	8/13/2020	0.75	Andy Legolvan
	Phone call with NVLSP regarding class certification strategy for Beaudette petition		
Date:	8/13/2020	0.25	Randall V. Johnston
	Review correspondence from M. Beaudette		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	8/14/2020	3.75	Anderson Y. To
	Research class action case law		
Date:	8/14/2020	2.50	Andy Legolvan
	Conduct further legal research and further draft motion for class certification in Beaudette case (2.0); phone call with Public Counsel regarding same (0.5)		
Date:	8/14/2020	0.50	Michael J. Fisher
	Summarize research findings on establishing numerosity for proposed class definition		
Date:	8/14/2020	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	8/15/2020	3.25	Andy Legolvan
	Conduct further legal research and further draft motion for class certification in Beaudette case		
Date:	8/16/2020	1.25	Andy Legolvan
	Conduct further legal research and further draft motion for class certification in Beaudette case		
Date:	8/17/2020	0.75	Alex T. Schulman
	Teleconference with potential class representative		
Date:	8/17/2020	4.75	Anderson Y. To
	Attend call with client (0.75); research class action case law (4.0)		
Date:	8/17/2020	5.25	Andy Legolvan
	Conduct further legal research and further draft motion for class certification in Beaudette case		
Date:	8/17/2020	0.75	Andy Legolvan
	Prepare for and attend phone call with clients (Beaudettes) regarding class certification (0.75); 0.75 eliminated in the exercise of billing judgment		
Date:	8/17/2020	0.75	Michael J. Fisher
	Teleconference with partner organization and prospective class member representative (0.75); 0.5 eliminated in the exercise of billing judgment		
Date:	8/17/2020	0.50	Randall V. Johnston
	Review correspondence regarding formation of class for Caregiver case		
Date:	8/18/2020	3.50	Anderson Y. To
	Research class action case law		
Date:	8/20/2020	1.50	Andy Legolvan
	Further draft motion for class certification in Beaudette action		
Date:	8/20/2020	0.25	Randall V. Johnston
	Review correspondence from A. Legolvan regarding motion for class certification		
Date:	8/21/2020	0.50	D. Scott Carlton
	Telephone conference with A. LeGolvan regarding class certification motion		
Date:	8/21/2020	0.25	Randall V. Johnston
	Review correspondence regarding class certification		
Date:	8/23/2020	0.25	Randall V. Johnston
	Review correspondence from A. Pertusati regarding motion for class certification		
Date:	8/24/2020	0.25	Randall V. Johnston
	Review correspondence regarding class certification		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	8/27/2020	1.00	Andy Legolvan
	Email correspondence and phone call with Public Counsel and Jenner regarding Beaudette petition in CAVC (0.25); phone call with Wounded Warriors regarding status of Beaudette petition in CAVC (0.75)		
Date:	8/28/2020	2.50	Andy Legolvan
	Further draft motion for class certification and declaration supporting same in Beaudette case		
Date:	8/28/2020	0.25	Kurt W. Hansson
	Review materials related to Beaudette CAVC petition and class certification motion		
Date:	9/2/2020	0.50	Andy Legolvan
	Further draft motion for class certification in Beaudette case		
Date:	9/3/2020	0.25	Andy Legolvan
	Phone call with John Niles of NVLSP regarding status of litigation and class certification		
Date:	9/10/2020	0.50	D. Scott Carlton
	Review draft motion for class certification		
Date:	9/30/2020	4.50	Andy Legolvan
	Further draft and finalize motion for class certification and declarations in support of same (Beaudette action)		
Date:	9/30/2020	6.25	James Jordan
	Begin proofreading and citechecking of motion for class certification		
Date:	10/1/2020	1.50	Andy Legolvan
	Further draft motion for class certification in Beaudette case, including declarations		
Date:	10/1/2020	7.50	James Jordan
	Complete preparation of motion for class certification for filing including organization of supportive declaration exhibits and final proofreading		
Date:	10/2/2020	2.00	Andy Legolvan
	Review, finalize, and file Beaudette motion for class certification and related documents		
Date:	10/5/2020	1.50	Andy Legolvan
	Review and analyze VA's response to petition and conduct legal research regarding same		
Date:	10/6/2020	1.00	Andy Legolvan
	Conduct legal research and analysis regarding arguments in response to VA's response to petition; 0.75 eliminated in the exercise of billing judgment		
Date:	10/7/2020	2.00	Andy Legolvan
	Review and analyze VA's response to petition and conduct legal research regarding same		
Date:	10/8/2020	2.50	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct legal research regarding same, and draft outline for reply brief		
Date:	10/8/2020	0.50	Andy Legolvan
	Review court orders in Baudette action regarding oral argument and motion for class certification (0.25); email correspondence with counsel for Secretary regarding motion for leave to file reply brief in support of petition (0.25)		
Date:	10/8/2020	1.50	C. Wendy Phinny
	Assist with upcoming court filings		
Date:	10/8/2020	0.25	James Jordan

Date:	Work Date	Hours Worked	Timekeeper Name
	Review court order regarding scheduling of oral arguments in Jeremy and Maya Beaudette v. Robert L. Wilkie (United States Court of Appeals for Veterans Claims).		
Date:	10/8/2020	1.00	Michael J. Fisher
	Research acquiescence doctrine for Beaudette reply brief		
Date:	10/9/2020	1.50	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct legal research regarding same, and draft outline for reply brief		
Date:	10/9/2020	1.00	Andy Legolvan
	Review and revise and file motion for leave to file reply brief		
Date:	10/9/2020	2.50	C. Wendy Phinny
	Calls and emails to CAVC appeals court and review draft of reply brief		
Date:	10/9/2020	1.50	Michael J. Fisher
	Draft motion ISO reply brief for Beaudette case (0.75); research acquiescence doctrine for Beaudette reply brief (0.75)		
Date:	10/12/2020	4.25	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct legal research regarding same, and draft outline for reply brief		
Date:	10/13/2020	0.75	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct legal research regarding same, and draft outline for reply brief		
Date:	10/13/2020	0.50	Randall V. Johnston
	Correspond regarding declarations, CAVC Beaudette case update		
Date:	10/14/2020	6.50	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and draft reply brief		
Date:	10/14/2020	2.00	Michael J. Fisher
	Research acquiescence doctrine for Beaudette reply brief		
Date:	10/15/2020	4.25	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and further draft reply brief		
Date:	10/15/2020	1.00	Andy Legolvan
	Phone call with M. Fisher (PH associate) regarding strategy for Beaudette petition		
Date:	10/15/2020	1.00	Andy Legolvan
	Phone call with NVLSP regarding strategy for Beaudette petition		
Date:	10/15/2020	2.75	Michael J. Fisher
	Teleconference with A. Glovan to strategize research for Beaudette reply brief (1.0); research issues for Beaudette reply brief (1.75)		
Date:	10/15/2020	0.25	Randall V. Johnston
	Review motion for leave to file reply brief and legislative history research		
Date:	10/16/2020	1.50	Andy Legolvan
	Review order from Beaudette court regarding oral argument (0.25); further draft reply brief in support of petition (1.25)		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	10/16/2020	2.00	Michael J. Fisher
	Research issues for Beaudette reply brief		
Date:	10/16/2020	0.25	Randall V. Johnston
	Review correspondence from A. Pertusati regarding class certification oral argument		
Date:	10/18/2020	1.00	Andy Legolvan
	Prepare for Beaudette oral argument		
Date:	10/19/2020	2.00	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and further draft reply brief		
Date:	10/20/2020	1.75	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and further draft reply brief		
Date:	10/20/2020	3.50	Michael J. Fisher
	Research legal issues for Beaudette reply brief		
Date:	10/21/2020	5.50	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and further draft reply brief		
Date:	10/22/2020	5.50	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and further draft reply brief		
Date:	10/22/2020	2.75	Michael J. Fisher
	Research legal issues for Beaudette reply brief		
Date:	10/23/2020	0.50	Andy Legolvan
	Further review and analyze Secretary's response brief to Beaudette petition, conduct further legal research regarding same, and further draft reply brief		
Date:	10/29/2020	4.50	Andy Legolvan
	Further draft reply brief in support of Beaudette petition		
Date:	10/30/2020	7.00	Andy Legolvan
	Further draft reply brief in support of Beaudette petition and conduct further legal research regarding same		
Date:	11/2/2020	1.50	Andy Legolvan
	Draft outline for oral argument in Beaudette petition		
Date:	11/2/2020	4.75	Andy Legolvan
	Further draft reply brief in support of Beaudette petition and conduct further legal research regarding same		
Date:	11/3/2020	1.25	Andy Legolvan
	Further draft outline for oral argument in Beaudette petition		
Date:	11/3/2020	2.50	Andy Legolvan
	Further draft reply brief in support of Beaudette petition and conduct further legal research regarding same		
Date:	11/5/2020	2.25	Michael J. Fisher
	Research legal issues for Beaudette reply brief		
Date:	11/9/2020	1.00	Michael J. Fisher
	Research legal issues for Beaudette reply brief		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	11/11/2020	1.50	Andy Legolvan
	Further draft outline for oral argument in Beaudette petition		
Date:	11/11/2020	4.50	Andy Legolvan
	Further draft reply brief in support of Beaudette petition and conduct further legal research regarding same		
Date:	11/11/2020	3.50	C. Wendy Phinny
	Confer with team regarding preparation for upcoming oral argument in Beaudette case and begin gathering necessary documents for same		
Date:	11/11/2020	0.75	Michael J. Fisher
	Summarize analysis of case law for Beaudette reply brief		
Date:	11/11/2020	1.25	Michael J. Fisher
	Teleconference with A. LeGolvan to review legal research for Beaudette reply brief		
Date:	11/12/2020	3.25	Andy Legolvan
	Further draft reply brief in support of Beaudette petition and conduct further legal research regarding same		
Date:	11/12/2020	3.50	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft outline for oral argument		
Date:	11/12/2020	3.50	C. Wendy Phinny
	Continue collecting documents for upcoming oral argument for A. LeGolvan		
Date:	11/13/2020	6.25	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft outline for oral argument		
Date:	11/13/2020	2.50	C. Wendy Phinny
	Review documents for upcoming oral argument for Beaudette case		
Date:	11/16/2020	4.50	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft reply brief		
Date:	11/17/2020	1.25	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft reply brief		
Date:	11/17/2020	3.50	C. Wendy Phinny
	Prepare binders for upcoming oral argument per A. LeGolvan		
Date:	11/18/2020	3.50	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft reply brief		
Date:	11/18/2020	3.50	C. Wendy Phinny
	Prepare binders for oral argument		
Date:	11/19/2020	2.50	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft reply brief		
Date:	11/19/2020	2.50	C. Wendy Phinny
	Review and upload new cases and statutes to Y drive for upcoming oral argument		
Date:	11/20/2020	1.50	Andy Legolvan
	Further review and analyze Beaudette petition pleadings and further draft reply brief		
Date:	11/20/2020	3.00	C. Wendy Phinny
	Continued preparation for upcoming oral argument		
Date:	11/24/2020	3.50	C. Wendy Phinny

Date:	Work Date	Hours Worked	Timekeeper Name
			Research cases and related materials for oral argument prep binders
Date:	11/25/2020	5.50	James Jordan
			Organize authorities cited in support of secretary's response brief in preparation for cite and fact checking of reply brief
Date:	11/30/2020	1.25	Andy Legolvan
			Further review and analyze Beaudette petition pleadings and further draft reply brief
Date:	11/30/2020	3.50	James Jordan
			Begin cite checking reply brief in support of petition.
Date:	12/1/2020	2.50	C. Wendy Phinny
			Prepare cases for oral argument binders
Date:	12/1/2020	3.00	James Jordan
			Begin fact check of cites in support of reply to petition.
Date:	12/1/2020	4.00	James Jordan
			Complete cite checking legal authorities in support of reply to petition
Date:	12/2/2020	0.75	Andy Legolvan
			Further review and analyze Beaudette petition pleadings and further draft reply brief
Date:	12/2/2020	4.00	James Jordan
			Complete fact checking of cites in support of reply to petition
Date:	12/3/2020	4.00	Andy Legolvan
			Further review and analyze Beaudette petition pleadings and further draft reply brief
Date:	12/3/2020	1.25	Andy Legolvan
			Prepare for oral argument in Beaudette petition
Date:	12/3/2020	5.00	C. Wendy Phinny
			Prepare documents for oral argument case binders
Date:	12/4/2020	2.25	Andy Legolvan
			Further review and revise reply brief in support of Beaudette petition
Date:	12/4/2020	0.75	Barry G. Sher
			Review reply brief and emails to A. LeGolvan regarding same
Date:	12/4/2020	4.00	C. Wendy Phinny
			Create more binders for A. LeGolvan for upcoming oral argument
Date:	12/5/2020	1.75	Andy Legolvan
			Further review and revise reply brief in support of Beaudette petition
Date:	12/5/2020	2.50	Andy Legolvan
			Prepare for oral argument for Beaudette petition
Date:	12/6/2020	2.00	Andy Legolvan
			Further review and revise reply brief in support of Beaudette petition
Date:	12/6/2020	2.75	Andy Legolvan
			Prepare for oral argument for Beaudette petition
Date:	12/7/2020	2.75	Andy Legolvan
			Further review and finalize reply brief in support of Beaudette petition

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	12/7/2020	1.75	Andy Legolvan
	Prepare for oral argument in Beaudette petition		
Date:	12/7/2020	2.00	Andy Legolvan
	Review and analyze VA's opposition to petitioners' motion for class certification and conduct legal research and analysis regarding same		
Date:	12/7/2020	5.00	C. Wendy Phinny
	Continued work on binders for upcoming oral argument		
Date:	12/7/2020	3.50	James Jordan
	Cite check Secretary's Response to Motion for Class Certification and Court Order in preparation to draft reply		
Date:	12/7/2020	2.00	Randall V. Johnston
	Review correspondence regarding amici briefs; extension of time, mail declarations, Beaudette reply brief		
Date:	12/8/2020	5.25	Andy Legolvan
	Further review and analyze VA's opposition to petitioners' motion for class certification, conduct legal research and analysis regarding same, and draft reply brief in support of class certification		
Date:	12/8/2020	1.50	Andy Legolvan
	Phone call with Beaudettes regarding status of Beaudette petition and upcoming oral argument		
Date:	12/8/2020	4.00	C. Wendy Phinny
	Organize other authorities for upcoming oral argument		
Date:	12/8/2020	6.25	James Jordan
	Organize record excerpts for attorney review in support of reply for Motion for Class Certification		
Date:	12/8/2020	1.50	Michael J. Fisher
	Teleconference with Beaudettes to prepare narrative for oral argument		
Date:	12/8/2020	0.50	Michael J. Fisher
	Teleconference with A. LeGolvan to strategize identification of exemplar veterans cases for Beaudette class certification reply brief		
Date:	12/9/2020	6.50	Andy Legolvan
	Further review and analyze VA's opposition to petitioners' motion for class certification, conduct legal research and analysis regarding same, and draft reply brief in support of class certification		
Date:	12/9/2020	3.00	C. Wendy Phinny
	Finalize other authorities binders for upcoming oral argument and arrange for production of same		
Date:	12/9/2020	0.75	Michael J. Fisher
	Research case law on denial of eligibility due to budget reduction for Beaudette class certification reply brief		
Date:	12/9/2020	0.25	Randall V. Johnston
	Correspond with A. Legolvan regarding reply brief; review correspondence regarding amici briefs		
Date:	12/9/2020	0.50	Sean Unger
	Review briefing on Veterans review and analysis for oral argument moot court		
Date:	12/10/2020	1.25	Andy Legolvan
	Draft motion for leave to file reply brief in support of class certification, and email correspondence with VA regarding same		
Date:	12/10/2020	3.50	Andy Legolvan
	Further review and analyze VA's opposition to petitioners' motion for class certification, conduct further legal research and analysis regarding same, and further draft reply brief in support of class certification		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	12/10/2020	3.25	Andy Legolvan
	Prepare for oral argument in Beaudette petition		
Date:	12/10/2020	6.50	James Jordan
	Fact and cite check reply for Motion for Class Certification		
Date:	12/10/2020	0.25	Randall V. Johnston
	Correspond regarding amici briefs		
Date:	12/10/2020	2.00	Sean Unger
	Review briefing in advance of oral argument moot court		
Date:	12/11/2020	4.50	Andy Legolvan
	Further draft motion for leave to file reply brief in support of class certification, and motion for leave to file reply brief		
Date:	12/11/2020	2.75	Andy Legolvan
	Prepare for oral argument in Beaudette petition		
Date:	12/11/2020	1.00	Barry G. Sher
	Review revised brief		
Date:	12/11/2020	4.25	James Jordan
	Complete fact and cite check and proofread reply for Motion for Class Certification		
Date:	12/11/2020	1.50	Michael J. Fisher
	Proof Beaudette class certification reply brief		
Date:	12/11/2020	0.25	Randall V. Johnston
	Correspond with A. Legolvan, A. Pertusati regarding Beaudette reply brief		
Date:	12/11/2020	1.00	Sean Unger
	Review reply and follow up on preparation for moot court		
Date:	12/13/2020	3.00	Andy Legolvan
	Prepare for oral argument in Beaudette petition		
Date:	12/14/2020	4.50	Andy Legolvan
	Prepare for oral argument in Beaudette petition		
Date:	12/14/2020	2.50	Andy Legolvan
	Review and finalize motion for leave to file reply brief in support of class certification and motion for leave to file reply brief		
Date:	12/14/2020	2.50	C. Wendy Pinny
	Review new pleadings and update binders for upcoming oral argument		
Date:	12/15/2020	4.25	Andy Legolvan
	Prepare for oral argument in Beaudette petition		
Date:	12/15/2020	2.25	Andy Legolvan
	Review Sullivan motion to consolidate with Beaudette and draft notice of non-opposition		
Date:	12/15/2020	-	C. Wendy Pinny
	3.5 eliminated in the exercise of billing judgment		
Date:	12/15/2020	0.75	Michael J. Fisher
	Research items for Beaudette CAVC oral argument for A. LeGolvan		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	12/15/2020	0.25	Sean Unger
	Review order on requested reply brief		
Date:	12/16/2020	1.25	Andy Legolvan
	Draft Beaudettes' notice of non-opposition to Sullivan motion to consolidate		
Date:	12/16/2020	3.25	Andy Legolvan
	Review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and draft oral argument outline		
Date:	12/16/2020	0.50	Randall V. Johnston
	Review and provide comment to non-opposition to Sullivan stay motion		
Date:	12/16/2020	0.50	Sean Unger
	Review and follow up on moot court issues and analysis		
Date:	12/17/2020	1.00	Andy Legolvan
	Further draft Beaudettes' notice of non-opposition to Sullivan motion to consolidate		
Date:	12/17/2020	0.75	Andy Legolvan
	Phone call with S. Unger regarding oral argument strategy for Beaudette petition		
Date:	12/17/2020	0.50	Andy Legolvan
	Review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and draft oral argument outline		
Date:	12/17/2020	1.25	Sean Unger
	Review and follow up on with A. Legolvan on oral argument preparation		
Date:	12/18/2020	0.50	Andy Legolvan
	Phone call with Maya Beaudette regarding status of litigation		
Date:	12/18/2020	3.25	Andy Legolvan
	Review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and draft oral argument outline		
Date:	12/19/2020	1.50	Andy Legolvan
	Review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and draft oral argument outline		
Date:	12/22/2020	1.00	Andy Legolvan
	Draft Beaudette motion for clarification of oral argument and request to reschedule oral argument		
Date:	12/22/2020	3.25	Andy Legolvan
	Review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and draft oral argument outline		
Date:	12/23/2020	6.25	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	12/24/2020	3.00	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	12/28/2020	3.25	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	12/28/2020	1.75	Andy Legolvan
	Review and finalize non-opposition to Sullivan motion to consolidate, and email correspondence and phone call with Public Counsel/Jenner Block regarding same (1.25); review VA's brief regarding same (0.5)		
Date:	12/29/2020	3.00	Andy Legolvan
	Review and finalize non-opposition to Sullivan motion to consolidate, and email correspondence and phone call with Public Counsel/Jenner Block regarding same (2.5); review VA's brief regarding same (0.5)		
Date:	12/30/2020	6.50	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	12/31/2020	6.25	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	1/1/2021	2.25	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	1/3/2021	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	1/4/2021	6.75	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	1/4/2021	0.25	Randall V. Johnston
	Review correspondence regarding pre-oral argument hearing		
Date:	1/5/2021	1.25	Andy Legolvan
	Further review and analyze Baudette briefing and evidence, and case law in support of same, in preparation for oral argument, and further draft oral argument outline		
Date:	1/6/2021	3.00	Andy Legolvan
	Further prepare for oral argument in Beaudette case		
Date:	1/6/2021	0.50	D. Scott Carlton
	Review and analyze motion for leave to file reply		
Date:	1/7/2021	3.50	Andy Legolvan
	Further prepare for oral argument in Beaudette case		
Date:	1/8/2021	0.50	Andy Legolvan
	Further prepare for oral argument in Beaudette case		
Date:	1/8/2021	3.00	Barry G. Sher
	Review CAVC petition and government response to petition (2.5); emails with A. LeGolvan regarding same (0.5)		
Date:	1/8/2021	0.25	Sean Unger
	Review and follow up on moot court on oral argument		
Date:	1/10/2021	2.25	Barry G. Sher
	Review merits briefs and class certification brief in preparation for oral argument moot court		
Date:	1/11/2021	7.25	Andy Legolvan
	Further prepare for oral argument in Beaudette case		
Date:	1/12/2021	8.00	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Further prepare for oral argument in Beaudette case
Date:	1/13/2021	5.00	Andy Legolvan
			Prepare for and attend moot argument for oral argument in Beaudette case
Date:	1/13/2021	0.50	Andy Legolvan
			Prepare for and attend pre-oral argument conference with clerk for Beaudette case
Date:	1/13/2021	3.75	Barry G. Sher
			Prepare for, and attend, mock argument with A. LeGolvan, S. Unger et al.
Date:	1/13/2021	1.75	Sean Unger
			Review materials for, and participate in, moot court argument
Date:	1/14/2021	4.25	Andy Legolvan
			Further prepare for oral argument in Beaudette case (3.75), and review and analyze VA's Solze notice of supplemental authorities (TEAM Veteran Caregivers Act) (0.5)
Date:	1/14/2021	0.25	Barry G. Sher
			Email with A. LeGolvan regarding argument
Date:	1/15/2021	6.50	Andy Legolvan
			Further prepare for oral argument in Beaudette case
Date:	1/15/2021	0.50	Sean Unger
			Continue preparation for oral argument
Date:	1/16/2021	8.00	Andy Legolvan
			Further prepare for oral argument in Beaudette case
Date:	1/17/2021	6.00	Andy Legolvan
			Further prepare for oral argument in Beaudette case
Date:	1/18/2021	5.25	Andy Legolvan
			Further prepare for oral argument in Beaudette case
Date:	1/18/2021	1.25	Michael J. Fisher
			Research additional case law for A. LeGolvan oral argument preparation in Beaudette CAVC case
Date:	1/19/2021	6.25	Andy Legolvan
			Further prepare for oral argument in Beaudette case
Date:	1/19/2021	1.00	Barry G. Sher
			Review merits briefing in light of latest filing by Secretary; emails with A. LeGolvan regarding plaintiffs
Date:	1/19/2021	0.50	Michael J. Fisher
			Research additional case law for A. LeGolvan oral argument preparation in Beaudette CAVC case
Date:	1/20/2021	7.25	Andy Legolvan
			Further prepare for oral argument in Beaudette case
Date:	1/20/2021	0.50	Sean Unger
			Review and follow up on oral argument preparation with A. Legolvan
Date:	1/21/2021	1.75	Andy Legolvan
			Attend oral argument in Beaudette case
Date:	1/21/2021	4.50	Andy Legolvan
			Further prepare for oral argument in Beaudette case

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	1/21/2021	2.25	Andy Legolvan
	Review oral argument video in Beaudette case (1.5); email correspondence with Paul Hastings team, Public Counsel, amicus filers, and client regarding same (0.75)		
Date:	1/21/2021	0.50	Barry G. Sher
	Emails with A. LeGolvan regarding argument		
Date:	1/21/2021	0.25	Randall V. Johnston
	Review correspondence regarding oral argument		
Date:	1/21/2021	0.25	Sean Unger
	Follow up on oral argument analysis with A. Legolvan		
Date:	1/22/2021	1.25	Andy Legolvan
	Further review oral argument video in Beaudette case (0.75); email correspondence with Paul Hastings team regarding same (0.5)		
Date:	1/22/2021	1.50	Barry G. Sher
	Review oral argument video (1.25); emails with team regarding argument (0.25)		
Date:	1/22/2021	0.25	Randall V. Johnston
	Review correspondence regarding oral argument		
Date:	1/22/2021	0.25	Sean Unger
	Review and follow up on oral argument with A. Legolvan		
Date:	2/8/2021	1.00	Andy Legolvan
	Review recent case law from SCOTUS to determine possible supplemental authorities pleading in Beaudette action		
Date:	2/8/2021	0.25	Sean Unger
	Review recent Supreme Court decision and follow up on additional case submission		
Date:	2/9/2021	3.00	Andy Legolvan
	Further review recent Supreme Court case law regarding judicial review (1.0); email correspondence with Paul Hastings team regarding same (0.5); email correspondence with VA's counsel regarding notice of supplemental authorities (0.5); and draft notice of supplemental authorities (1.5)		
Date:	2/11/2021	0.50	Andy Legolvan
	Phone call with paralegal J. Jordan regarding status of Beaudette and oral argument		
Date:	2/17/2021	2.00	Andy Legolvan
	Review oral argument video and consider potential supplemental authorities in support of petition and conduct legal research regarding same (1.5); review recently-filed 502 petition in the federal circuit relating to the Caregiver Program to determine impact on litigation strategy (0.5)		
Date:	3/2/2021	1.00	Andy Legolvan
	Conduct legal research regarding potential supplemental authorities for petition briefing		
Date:	3/4/2021	3.75	Andy Legolvan
	Conduct legal research regarding potential Social Security related supplemental authority to submit in support of petition; draft notice of supplemental authority		
Date:	3/5/2021	1.50	Andy Legolvan
	Conduct further legal research regarding potential Social Security related supplemental authority to submit in support of petition; further draft notice of supplemental authority		
Date:	3/17/2021	2.50	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Email correspondence with Public Counsel regarding status of litigation (0.25); review briefing and oral argument in Wolfe case regarding significant class management issues (2.25)
Date:	3/29/2021	0.50	Andy Legolvan
			Conduct further legal research regarding potential supplemental authorities in Beaudette
Date:	4/13/2021	1.75	Andy Legolvan
			Conduct legal research regarding potential supplemental authorities to support petition or class certification
Date:	4/19/2021	4.50	Andy Legolvan
			Review decision in Beaudette on petition and class certification (0.5); conduct legal research regarding next steps (3.25); email correspondence and phone call with various individuals from Paul Hastings team, Public Counsel, and amicus filers regarding same (0.5)
Date:	4/19/2021	0.50	Barry G. Sher
			Review court decision granting mandamus petition and class certification (0.25); emails with team regarding same (0.25)
Date:	4/19/2021	1.00	Randall V. Johnston
			Correspond with team regarding CAVC decision granting mandamus petition and class certification
Date:	4/19/2021	0.50	Sean Unger
			Review order granting mandamus petition and class certification (0.25); follow up with A. Legolvan regarding the same (0.25)
Date:	4/19/2021	0.50	Sean Unger
			Telephone conference with A. Legolvan regarding order granting mandamus petition and class certification
Date:	4/20/2021	2.25	Andy Legolvan
			Further review decision in Beaudette on petition and class certification and related class actions to determine next steps for enforcement of class notice (1.5); email correspondence and phone calls with various individuals from Paul Hastings team, Public Counsel, and amicus filers regarding same (0.75)
Date:	4/20/2021	1.50	Randall V. Johnston
			Correspondence regarding CAVC order granting mandamus petition and class certification and subsequent strategy
Date:	4/21/2021	4.75	Andy Legolvan
			Further review decision in Beaudette on petition and class certification and related class actions to determine next steps for enforcement of class notice (2.0); conduct legal research and analysis regarding potential arguments relating to exhaustion element of the certified class (2.25); email correspondence with potential class member regarding status of the case (0.25); phone call with A. Pertusati regarding status of the case (0.25)
Date:	4/21/2021	0.25	Randall V. Johnston
			Correspond regarding CAVC order granting petition for mandamus and subsequent strategy
Date:	4/22/2021	3.50	Andy Legolvan
			Further review decision in Beaudette on petition and class certification and related class actions to determine next steps for enforcement of class notice (1.0); conduct further legal research and analysis regarding potential arguments relating to exhaustion element of the certified class (1.0); draft strategy memorandum regarding enforcement of the court's class certification order (1.25); phone call with J. Niles regarding status of the case and class certification (0.25)
Date:	4/23/2021	4.75	Andy Legolvan
			Further draft strategy memorandum regarding enforcement of the court's class certification order (2.5); phone call and email correspondence with potential class member regarding status of his claim (0.5); email correspondence with NVLSP regarding class certification (0.25); email correspondence with counsel for VA

Date:	Work Date	Hours Worked	Timekeeper Name
			regarding class action order and notice (0.25); conduct further legal research regarding strategy for class notice (0.75)
Date:	4/23/2021	0.50	D. Scott Carlton
			Follow up with A. LeGolvan regarding CAVC order granting mandamus petition and next steps
Date:	4/23/2021	1.00	Michael J. Fisher
			Review CAVC class certification cases in advance of strategy call
Date:	4/23/2021	0.75	Randall V. Johnston
			Correspond and conference with PH team regarding preparation for potential appeal from CAVC decision
Date:	4/25/2021	0.25	Randall V. Johnston
			Review correspondence from A. Pertusati regarding next steps
Date:	4/26/2021	2.25	Andy Legolvan
			Email correspondence with Public Counsel regarding strategy for class notice (0.25); internal call with Paul Hastings attorneys regarding strategy for class notice and potential appeal (1.25); email correspondence with VA's counsel regarding status of class notice (0.25); conduct legal research regarding timing and viability of VA's appeal options (0.75)
Date:	4/26/2021	0.75	Barry G. Sher
			Email with team regarding potential appeal from CAVC order
Date:	4/26/2021	2.00	Michael J. Fisher
			Team call regarding strategy for class notice and potential appeal (1.25); review case law on appeal of CAVC decisions for A. LeGolvan and I. Timofeyev (0.75)
Date:	4/26/2021	1.25	Randall V. Johnston
			Conference and correspond with I. Timofeyev, A. Legolvan, A. Pertusati regarding next steps, including strategy for class notice and potential appeal
Date:	4/27/2021	4.00	Andy Legolvan
			Conduct legal research regarding class action notice in Beaudette action (2.0); prepare for and attend phone call with Public Counsel regarding status of Beaudette and next steps (1.5); email correspondence with VA's counsel regarding enforcement of the court's decision in Beaudette (0.5)
Date:	4/27/2021	1.50	Randall V. Johnston
			Correspond and conference with PH, PC teams regarding next steps and third party outreach
Date:	4/29/2021	0.5	Barton F. Stichman
			Review and analyze Court order and identify issues to advocate for in required notice plan
Date:	4/30/2021	3.00	Andy Legolvan
			Prepare for and attend litigation strategy call with NVLSP and Public Counsel to jointly prepare and submit notice plan in response to CAVC's class certification order (1.0); review and revise class notice and jot form for Public Counsel website (0.5); phone call with putative class member regarding claim (0.5); conduct further legal research and analysis regarding preparation of notice plan in response to CAVC's class certification order (1.0)
Date:	4/30/2021	0.0	Barton F. Stichman
			Conf w/ Andy G at Paul Hastings, Amanda @ Public Counsel, CM, RB, & EL regarding Court order to jointly prepare and submit notice plan to the Court; evaluate same (0.8) [0.8 eliminated in the exercise of billing judgment]
Date:	4/30/2021	0.0	Esther Leibfarth
			Call with Paul Hastings regarding Court order to jointly prepare and submit notice plan to the Court [0.8 eliminated in the exercise of billing judgment]

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	4/30/2021	0.0	Rochelle Bobroff
	Call with Paul Hastings regarding Court order to jointly prepare and submit notice plan to the Court [0.8 eliminated in the exercise of billing judgment]		
Date:	5/3/2021	0.75	Andy Legolvan
	Phone call and email correspondence with Public Counsel regarding preparation of joint notice plan (0.25); review draft class notice joint form (0.5)		
Date:	5/4/2021	1.00	Andy Legolvan
	Prepare for and attend phone call with Chicago veterans clinic director Y. Duterte regarding preparation of joint notice plan (0.5); phone call with Public Counsel regarding preparation of joint notice plan (0.5)		
Date:	5/5/2021	0.50	Andy Legolvan
	Email correspondence with VA's counsel regarding preparation of joint notice plan for submission to CAVC		
Date:	5/5/2021	1.50	Michael J. Fisher
	Research finality of CAVC decisions for purposes of appeal for A. LeGolvan		
Date:	5/6/2021	3.25	Andy Legolvan
	Email correspondence with Public Counsel and NVLSP regarding case status and strategy (0.25); review and analyze Caregiver Program documents FOIA'd from VA medical centers to determine impact on class notice strategy (0.75); phone call with J. Jordan of Paul Hastings regarding same (0.25); conduct further legal research regarding upcoming case deadlines including potential motion for en banc review, motion to stay, and appeal (1.5); 0.5 eliminated in the exercise of billing judgment		
Date:	5/6/2021	1.00	Michael J. Fisher
	Research finality of CAVC decisions for purposes of appeal		
Date:	5/7/2021	0.75	Andy Legolvan
	Phone call with Public Counsel regarding preparation of joint notice plan for CAVC		
Date:	5/10/2021	-	Andy Legolvan
	2.0 eliminated in the exercise of billing judgment		
Date:	5/10/2021	4.75	Andy Legolvan
	Review and analyze VA's motion for full court review in Beaudette (0.5); conduct legal research regarding same (1.25); and draft response brief (3.0)		
Date:	5/10/2021	2.25	Michael J. Fisher
	Review standards for en banc review at CAVC		
Date:	5/10/2021	0.25	Sean Unger
	Review and follow up on petition for rehearing en banc		
Date:	5/11/2021	0.75	Andy Legolvan
	Email correspondence and phone calls with several caregiver program claimants regarding the class action decision (0.5); email correspondence with VA's counsel regarding status of compliance with the court's decision (0.25)		
Date:	5/11/2021	6.50	Andy Legolvan
	Further review and analyze VA's motion for full court review (1.0); conduct further legal research regarding same (1.5); and draft response brief (4.0)		
Date:	5/11/2021	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	5/12/2021	5.25	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Conduct further legal research regarding VA's motion for full court review (1.25); further draft response brief (4.0)
Date:	5/12/2021	0.50	Andy Legolvan
			Phone call with potential caregiver/class member regarding status of case (0.25); email correspondence with VA's counsel regarding status of case (0.25)
Date:	5/12/2021	0.25	Andy Legolvan
			Email correspondence with NVLSP, Public Counsel, and Paul Hastings team regarding court judgement in Beaudette
Date:	5/13/2021	4.75	Andy Legolvan
			Conduct further legal research regarding VA's motion for full court review (1.75); and further draft response brief (3.0)
Date:	5/13/2021	0.50	Andy Legolvan
			Email correspondence with NVLSP regarding preparation of joint notice plan (0.25); email correspondence with Public Counsel regarding same (0.25); 0.5 eliminated in the exercise of billing judgment
Date:	5/14/2021	3.00	Andy Legolvan
			Further draft response to VA's motion for full court review
Date:	5/14/2021	0.25	Andy Legolvan
			Email correspondence with Public Counsel regarding class notice strategy (0.25); 0.75 eliminated in the exercise of billing judgment
Date:	5/17/2021	0.25	Andy Legolvan
			Email correspondence with potential class member regarding joint notice plan
Date:	5/17/2021	6.75	Andy Legolvan
			Further draft response to VA's motion for full court review
Date:	5/18/2021	5.50	Andy Legolvan
			Further draft response to VA's motion for full court review
Date:	5/18/2021	2.75	Andy Legolvan
			Phone call with A. Pertusati of Public Counsel regarding preparation of joint notice plan (0.25); prepare for and attend conference call with Public Counsel and NVLSP regarding joint notice plan (1.25); further draft proposed joint class notice outline (1.25)
Date:	5/18/2021	1.1	Barton F. Stichman
			Call with co-counsel regarding Court order to jointly prepare and submit notice plan to the Court and entry of Bart/NVLSP as co-class counsel; evaluate same
Date:	5/18/2021	0.0	Rochelle Bobroff
			Call with co-counsel regarding Court order to jointly prepare and submit notice plan to the Court and entry of Bart/NVLSP as co-class counsel [0.5 eliminated in the exercise of billing judgment]
Date:	5/19/2021	0.75	Andy Legolvan
			Email correspondence with NVLSP and Public Counsel regarding joint class notice plan (0.5); phone call and email correspondence with counsel for potential class member in Beaudette (0.25)
Date:	5/19/2021	2.00	Andy Legolvan
			Further draft response to VA's motion for full court review
Date:	5/19/2021	3.25	Andy Legolvan
			Review documents FOIA'd from various VA medical centers and VISNs to determine impact on class notice issues (1.75); draft summary of same (1.5)

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	5/20/2021	0.50	Andy Legolvan
	Email correspondence with VA's counsel regarding class notice plan (0.25); email correspondence and phone call with Public Counsel and NVLSP regarding same (0.25)		
Date:	5/20/2021	2.75	Andy Legolvan
	Review documents FOIA'd from various VA medical centers and VISNs to determine impact on class notice issues (0.75); draft summary of same (2.0)		
Date:	5/20/2021	0.25	Randall V. Johnston
	Correspond with A. LeGolvan regarding case		
Date:	5/24/2021	0.50	Andy Legolvan
	Email correspondence with Public Counsel regarding FOIA document production (0.25); email correspondence with NVLSP regarding joint class notice plan (0.25)		
Date:	5/26/2021	2.00	Andy Legolvan
	Review email correspondence from VA regarding joint class notice plan (0.25); review VA's draft joint class notice plan (0.5); draft comments and notes regarding same (1.0); email correspondence with litigation team regarding same (0.25)		
Date:	5/26/2021	0.25	Randall V. Johnston
	Review correspondence from A. Legolvan regarding VA joint plan for class notice		
Date:	5/26/2021	0.50	Sean Unger
	Review and provide comments to A. Legolvan regarding draft notice plan		
Date:	5/27/2021	3.00	Andy Legolvan
	Further review VA's draft joint class notice plan and further draft comments and notes regarding same (2.25); email correspondence and conference call with NVLSP and Public Counsel regarding same (0.75)		
Date:	5/27/2021	0.0	Barton F. Stichman
	Call with Paul Hastings regarding strategy for call with VA OGC re: notice plan and joint motion for an Extension of Time [0.7 eliminated in the exercise of billing judgment]		
Date:	5/27/2021	0.0	Esther Leibfarth
	Call with Paul Hastings regarding strategy for call with VA OGC re: notice plan and joint motion for an Extension of Time [0.7 eliminated in the exercise of billing judgment]		
Date:	6/1/2021	0.50	Andy Legolvan
	Email correspondence with VA's counsel and NVLSP regarding joint notice plan (0.25); conduct legal research regarding appearance of NVLSP (0.25)		
Date:	6/1/2021	1.00	Andy Legolvan
	Further review VA's draft joint class notice plan and draft strategy outline regarding same		
Date:	6/1/2021	1.25	Andy Legolvan
	Prepare for and attend conference call with Public Counsel and NVLSP regarding class notice strategy		
Date:	6/1/2021	1.75	Andy Legolvan
	Review NVLSP's entry of appearance, draft request for approval of NVLSP as additional representative, and email correspondence with NVLSP regarding same		
Date:	6/1/2021	1.1	Barton F. Stichman
	Call with Paul Hastings regarding issues to advocate for in Court ordered notice plan		
Date:	6/1/2021	0.1	Brianna LeFrere
	draft notice of appearance for Bart Stichman		
Date:	6/1/2021	0.25	Randall V. Johnston

Date:	Work Date	Hours Worked	Timekeeper Name
			Review correspondence from PH team regarding NVLSP co-counsel agreement
Date:	6/2/2021	1.75	Andy Legolvan
			Email correspondence with VA's counsel regarding status of NVLSP's appearance, joint class notice plan, and status of the Beaudettes' Board appeal (0.25); conduct legal research regarding VA's position that its motion for en banc review stays the Beaudettes' Board appeal (1.25); email correspondence with NVLSP and Public Counsel regarding same (0.25)
Date:	6/2/2021	6.00	Emma C. O'Hanlon
			Research automatic stay pending motion for en banc review issue
Date:	6/2/2021	0.50	Emma C. O'Hanlon
			Telephone conference with A. LeGolvan regarding automatic stay pending motion for en banc review research assignment
Date:	6/3/2021	1.50	Andy Legolvan
			Conduct further legal research regarding VA's position that its motion for en banc review stays the Beaudettes' Board appeal (1.25); further email correspondence VA regarding same (0.25)
Date:	6/3/2021	1.00	Emma C. O'Hanlon
			Video conference with A. LeGolvan and E. Atkinson regarding research concerning VA's position on automatic stay and upcoming telephone conference with VA
Date:	6/4/2021	1.25	Andy Legolvan
			Review order granting approval for NVLSP representations (0.25); email correspondence with VA's counsel regarding status of Beaudettes' Board appeal (0.25); email correspondence with NVLSP and Public Counsel regarding same (0.25); email correspondence with Public Counsel regarding FOIA review (0.5)
Date:	6/7/2021	-	Andy Legolvan
			1.0 eliminated in the exercise of billing judgment
Date:	6/7/2021	1.75	Andy Legolvan
			Review and revise draft questions from NVLSP for VA's counsel (1.0); draft email correspondence to VA's counsel regarding draft questions and setting up call to discuss joint class notice plan (0.25); email correspondence with VA GC regarding upcoming call (0.25); email correspondence with NVLSP and Public Counsel regarding same (0.25)
Date:	6/7/2021	2.2	Barton F. Stichman
			Review and draft inserts to draft of questions for VAGC/VAIA
Date:	6/8/2021	0.50	Andy Legolvan
			Draft email update to Paul Hastings team regarding status update on joint notice plan
Date:	6/8/2021	0.25	Andy Legolvan
			Email correspondence with NVLSP and Public Counsel regarding upcoming conference call with VA general counsel and recent audit relating to Caregiver Program IT compliance
Date:	6/8/2021	0.75	Andy Legolvan
			Prepare for and attend conference call with VA general counsel regarding status of litigation
Date:	6/8/2021	3.25	Andy Legolvan
			Review and analyze recent audit relating to Caregiver Program IT compliance to determine impact on litigation strategy (2.0) conduct legal research regarding same (1.25)
Date:	6/8/2021	2.3	Barton F. Stichman
			Conf w/ Holly Ferrel re: Caregiver system of recounts (1.0); Conf w/ VAGC Sunbert and Assistance VAGC Hipolit regarding possible settlement and related matters (0.8); call with co-counsel to discuss strategy in light of discussion with VAGC; evaluate same (0.5)

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	6/8/2021	2.50	Emma C. O'Hanlon
	Video conference with A. LeGolvan and E. Atkinson regarding OIG audit report and upcoming conference with opposing counsel (0.5); prepare OIG audit report summary of key IT system issues (2.0)		
Date:	6/8/2021	0.25	Randall V. Johnston
	Review correspondence from A. LeGolvan regarding call with VA GC		
Date:	6/8/2021	0.0	Rochelle Bobroff
	Call with Paul Hastings regarding issues to advocate for in Court ordered notice plan [0.5 eliminated in the exercise of billing judgment]		
Date:	6/8/2021	0.75	Sean Unger
	Conference with A. Legolvan regarding latest proposal from VA's counsel		
Date:	6/9/2021	7.25	Andy Legolvan
	Conduct legal research relating to VA's proposal for the Beaudettes' individual Board appeal and potential impact on the litigation (2.25); draft summary of same (4.5); email correspondence and phone call with Paul Hastings team (0.5)		
Date:	6/9/2021	0.75	Andy Legolvan
	Phone call with NVLSP and Public Counsel regarding VA's proposal for the Beaudettes' individual Board appeal, issued to advocate for in notice plan, and strategy to obtain relief for named petitioners		
Date:	6/9/2021	0.50	Andy Legolvan
	Review VA's email correspondence relating to proposal for the Beaudettes' individual Board appeal (0.25); email correspondence with NVLSP and Public Counsel regarding same (0.25)		
Date:	6/9/2021	0.6	Barton F. Stichman
	Conf call w/ Andy, Amanda, et al regarding strategy to obtain relief for named petitioners; evaluate same		
Date:	6/9/2021	3.75	Emma C. O'Hanlon
	Telephone conferences with E. Atkinson regarding class action research and OIG audit summary (0.5); prepare OIG audit report summary of key IT system issues (3.25)		
Date:	6/9/2021	0.25	Randall V. Johnston
	Review correspondence from S. Unger, A. LeGolvan regarding correspondence from VA and impact on class		
Date:	6/9/2021	0.0	Rochelle Bobroff
	Conf call w/ Andy, Amanda, et al regarding strategy to obtain relief for named petitioners [0.5 eliminated in the exercise of billing judgment]		
Date:	6/9/2021	1.50	Sean Unger
	Review and follow up with A. LeGolvan regarding VA proposals concerning joint notice plan		
Date:	6/10/2021	4.25	Andy Legolvan
	Conduct further legal research relating to VA's proposal for the Beaudettes' individual Board appeal and potential impact on the litigation (1.0); further email correspondence NVLSP and Public Counsel regarding same (0.25); draft email correspondence to VA regarding proposal (3.0)		
Date:	6/10/2021	0.75	Emma C. O'Hanlon
	Telephone conference with E. Atkinson regarding audit report and case law research (0.25); email to A. LeGolvan regarding audit report summary (0.5)		
Date:	6/10/2021	0.25	Sean Unger
	Review and follow up with A. LeGolvan on VA proposal		
Date:	6/11/2021	1.50	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Prepare for and attend phone call with the Beaudettes regarding joint notice plan and status of litigation (1.25); email correspondence with NVLSP and Public Counsel regarding same (0.25)
Date:	6/11/2021	0.50	Sean Unger
			Review and follow up with A. LeGolvan on class representative notice
Date:	6/14/2021	1.00	Andy Legolvan
			Email correspondence with NVLSP and Public Counsel regarding issues relating to notice to class (0.5); draft email correspondence to VA's counsel regarding upcoming class notice conference call and status of the Beaudettes' individual Board appeal (0.5)
Date:	6/14/2021	0.25	Andy Legolvan
			Phone call with potential class member caregiver regarding case
Date:	6/14/2021	2.50	Andy Legolvan
			Review research relating to class notice obligation where defendant lacks records relating to the class and factual research relating to VA's records for the Caregiver Program to determine strategy for upcoming call with CA
Date:	6/15/2021	0.4	Barton F. Stichman
			Conf w/ co-counsel re: new potential class members and evaluate same.
Date:	6/16/2021	3.00	Andy Legolvan
			Prepare for upcoming conference call with VA regarding joint notice proposal (1.5); attend conference call with VA (1.5)
Date:	6/16/2021	1.7	Barton F. Stichman
			Conf w/ VAGC regarding issues relating to notice to class
Date:	6/16/2021	0.0	Christopher G. Murray
			Conf w/ VAGC regarding issues relating to notice to class [1.7 eliminated in the exercise of billing judgment]
Date:	6/16/2021	5.00	Emma C. O'Hanlon
			Attend notice plan telephone conference with VA (1.5); prepare detailed summary of telephone conference (3.5)
Date:	6/17/2021	0.25	Andy Legolvan
			Email correspondence with Public Counsel and NVLSP regarding potential class representatives
Date:	6/18/2021	0.75	Andy Legolvan
			Email correspondence with VA's counsel regarding joint notice plan follow up questions (0.5); review summary of call with VA (0.25)
Date:	6/18/2021	2.00	Emma C. O'Hanlon
			Prepare detailed summary and high-level summary of notice plan telephone conference with VA
Date:	6/21/2021	0.25	Emma C. O'Hanlon
			Read email from A. LeGolvan to VA regarding request for written response to notice plan questions
Date:	6/22/2021	0.75	Andy Legolvan
			Phone call and email correspondence with potential class member claimant
Date:	6/22/2021	1.25	Andy Legolvan
			Conference call with NVLSP and Public Counsel regarding next steps and negotiation strategy for notice plan (0.75); email correspondence with NVLSP regarding joint notice strategy (.5)
Date:	6/22/2021	0.7	Barton F. Stichman
			Conf w Andy G & RB & Chris M re next steps and negotiation strategy for notice plan
Date:	6/22/2021	0.0	Christopher G. Murray

Date:	Work Date	Hours Worked	Timekeeper Name
	Conf w Andy G & RB & BFS re next steps and negotiation strategy for notice plan [0.7 eliminated in the exercise of billing judgment]		
Date:	6/23/2021	0.75	Andy Legolvan
	Review VA's draft joint motion for extension of time to submit joint notice plan (0.25); email correspondence with NVLSP and Public Counsel regarding same (0.25); email correspondence with VA's counsel regarding same (0.25)		
Date:	6/29/2021	0.50	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding next steps and negotiation strategy for notice plan		
Date:	6/29/2021	2.00	Andy Legolvan
	Review potential candidates for additional class representatives (0.5); draft joint motion for approval of additional class representatives (1.0); email correspondence with Public Counsel and NVLSP regarding same (0.5)		
Date:	6/29/2021	0.9	Barton F. Stichman
	Review and draft inserts for correspondence with co-counsel regarding 6/16 conference w/ VA OGC and litigation strategy		
Date:	6/29/2021	0.0	Christopher G. Murray
	Conf w co-counsel re next steps and negotiation strategy for notice plan [0.9 eliminated in the exercise of billing judgment]		
Date:	6/30/2021	1.00	Andy Legolvan
	Review and revise summary of call with VA regarding class notice (0.5); email correspondence with VA regarding same (0.5)		
Date:	6/30/2021	2.5	Barton F. Stichman
	Finalize correspondence to co-counsel regarding 6/16 conference w/ VA OGC and litigation strategy		
Date:	7/6/2021	0.75	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding litigation strategy and next steps (0.5); email correspondence with VA's counsel regarding status of joint notice plan (0.25)		
Date:	7/6/2021	0.0	Renee Burbank
	Teleconference with B. Stichman, R. Bobroff, and co-counsel regarding litigation strategy and next steps. [0.5 eliminated in the exercise of billing judgment]		
Date:	7/7/2021	2.00	Andy Legolvan
	Conduct further legal research and analysis regarding adding additional named class representatives (0.75); further draft joint motion regarding same (1.25)		
Date:	7/7/2021	0.50	Emma C. O'Hanlon
	Emails to A. LeGolvan and E. Atkinson regarding VA call summary and class certification research project		
Date:	7/8/2021	0.25	Andy Legolvan
	Email correspondence with NVLSP, Public Counsel, and VA GC office regarding upcoming conference call with VA GC		
Date:	7/9/2021	1.25	Andy Legolvan
	Conduct legal research regarding strategy for adding new named class representatives and further draft joint motion regarding same		
Date:	7/9/2021	0.25	Andy Legolvan
	Email correspondence with VA's counsel regarding status of joint notice plan and upcoming call with VA		
Date:	7/9/2021	0.0	Renee Burbank

Date:	Work Date	Hours Worked	Timekeeper Name
			Email correspondence with firm counsel regarding litigation strategy and planned meeting w/ VA OGC to negotiate notice plan [0.1 eliminated in the exercise of billing judgment]
Date:	7/12/2021	0.75	Emma C. O'Hanlon
			Telephone conference with E. Atkinson regarding class certification research
Date:	7/13/2021	1.25	Andy Legolvan
			Conference call with NVLSP regarding strategy for negotiating notice plan (0.5); email correspondence with VA's counsel regarding status of joint notice plan (0.25); correspondence with summer associates regarding status of research relating to mootness and adding class representatives (0.75)
Date:	7/13/2021	0.4	Barton F. Stichman
			Teleconference with co-counsel re: strategy in negotiating notice plan; evaluate same
Date:	7/13/2021	0.0	Barton F. Stichman
			Review and draft inserts for correspondence from A LeGolvan to VA OGC re: delays in responding to June 18 questions about VA's representations about VHA's limitations and practices as relevant to joint notice plan [0.1 eliminated in the exercise of billing judgment]
Date:	7/13/2021	0.0	Christopher G. Murray
			Teleconference with co-counsel re: strategy in negotiating notice plan; .6 eliminated in exercise of billing judgment [0.4 eliminated in the exercise of billing judgment]
Date:	7/13/2021	0.0	Renee Burbank
			Teleconference with co-counsel re: strategy in negotiating notice plan [0.4 eliminated in the exercise of billing judgment]
Date:	7/13/2021	0.0	Renee Burbank
			review draft correspondence from A LeGolvan to VA OGC re: delays in responding to June 18 questions about VA's representations about VHA's limitations and practices as relevant to joint notice plan [0.1 eliminated in the exercise of billing judgment]
Date:	7/14/2021	0.75	Andy Legolvan
			Email correspondence and phone call with prospective new class representative (Barbee)
Date:	7/15/2021	1.00	Andy Legolvan
			Email correspondence with potential class member Jerry Barbee regarding status of caregiver claim (0.25); review stipulation to extend joint notice deadline and email correspondence with VA regarding same (0.75)
Date:	7/15/2021	0.0	Renee Burbank
			email correspondence w/ co-counsel and opposing counsel regarding scheduling call with opposing counsel and proposing extension necessary [0.3 eliminated in the exercise of billing judgment]
Date:	7/16/2021	1.25	Andy Legolvan
			Review court order granting stipulation to extend deadline to file joint notice plan (0.75); email correspondence with VA's counsel regarding same (0.5)
Date:	7/19/2021	1.75	Andy Legolvan
			Prepare for and attend conference call with general counsel for VA regarding settlement discussion (1.0); email correspondence with NVLSP and Public Counsel regarding same (0.25); email correspondence with VA's counsel regarding joint class notice plan (0.5)
Date:	7/19/2021	0.6	Barton F. Stichman
			Conf w/ VAGC Sauber and our team re settlement; evaluate same
Date:	7/19/2021	3.00	Yael Hopkovitz

Date:	Work Date	Hours Worked	Timekeeper Name
	Research on when a class representative settles a case, whether the class continues: without a class representative, with the same class representative, does a new class representative have to be added to continue litigating the case (E Atkinson).		
Date:	7/20/2021	1.25	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding notice plan and notice to class members (0.5); review and revise joint motion to add named representatives (0.75)		
Date:	7/20/2021	0.0	Renee Burbank
	Call with lead counsel re: status of negotiations w/ VAGC for notice plan and notice to class members, possible settlement [0.5 eliminated in the exercise of billing judgment]		
Date:	7/21/2021	1.50	Andy Legolvan
	Email correspondence with VA's counsel regarding joint class notice plan (0.25); review class notice plans from prior cases (e.g., Skaar) to determine strategy for joint class notice (1.25); 1.25 eliminated in the exercise of billing judgment		
Date:	7/22/2021	1.50	Andy Legolvan
	Review and analyze VA's revised class notice plan and draft notes relating to same (0.25); phone call and email correspondence with Public Counsel and NVLSP regarding same (0.25); draft joint notice plan for submission to the Court (1.0); 0.5 eliminated in the exercise of billing judgment		
Date:	7/22/2021	0.4	Barton F. Stichman
	.Review of VAGC proposal of notice to class (0.4) [Additional 0.7 eliminated in the exercise of billing judgment]		
Date:	7/22/2021	2.50	Emma C. O'Hanlon
	Research procedure for adding named class representatives post-certification		
Date:	7/23/2021	6.50	Andy Legolvan
	Prepare for upcoming calls with NVLSP/Public Counsel and VA's counsel regarding joint class notice and litigation strategy (2.0); attend call with NVLSP/Public Counsel regarding same (0.75); call with NVLSP/Public Counsel and VA's counsel regarding same (0.75); draft joint motion for approval of joint notice plan (3.0)		
Date:	7/23/2021	0.8	Barton F. Stichman
	conf w/ VAGC re joint notice plan for Court		
Date:	7/23/2021	0.3	Barton F. Stichman
	review VAGC draft proposal of class notice and identify issues in the draft for negotiating		
Date:	7/23/2021	1.50	Emma C. O'Hanlon
	Attend telephone conference regarding preparation for telephone conference with VA Counsel regarding joint class notice (0.75); attend telephone conference with VA Counsel (0.75); 0.5 eliminated in the exercise of billing judgment		
Date:	7/23/2021	0.0	Renee Burbank
	videoconference with lead counsel and co-counsel re: VA draft notice and litigation strategy [0.8 eliminated in the exercise of billing judgment]		
Date:	7/26/2021	4.25	Andy Legolvan
	Further draft joint motion for approval of joint notice plan and proposed joint notice plan		
Date:	7/26/2021	1.75	Emma C. O'Hanlon
	Research regarding mootness of a named plaintiff's claim after class certification		
Date:	7/27/2021	1.00	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding joint notice plan and case strategy		
Date:	7/27/2021	2.50	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Further draft motion for approval of joint notice plan and further draft joint notice plan
Date:	7/27/2021	0.75	Andy Legolvan Phone call with M. McNabb, VA, regarding joint notice plan
Date:	7/27/2021	0.0	Barton F. Stichman video teleconference with co-counsel re: case strategy, class notice, and next steps [1.0 eliminated in the exercise of billing judgment]
Date:	7/27/2021	3.00	Emma C. O'Hanlon Research regarding mootness of a named plaintiff's claim after class certification
Date:	7/27/2021	2.0	Renee Burbank Draft inserts and revise draft class notice
Date:	7/27/2021	0.0	Renee Burbank video teleconference with co-counsel re: case strategy, class notice, and next steps [1.0 eliminated in the exercise of billing judgment]
Date:	7/28/2021	4.25	Andy Legolvan Further draft motion for approval of joint notice plan and further draft joint notice plan and proposed notices (3.75); email correspondence with NVLSP/Public Counsel regarding same (0.25); email correspondence with VA's counsel regarding same (0.25)
Date:	7/28/2021	0.0	Barton F. Stichman Review of and draft inserts to co-counsel's revised draft notice plan (0.4); Review of and draft inserts to Renee B's new draft of 2 notice letters (0.5) [Entire 0.9 eliminated in the exercise of billing judgment]
Date:	7/28/2021	0.25	Emma C. O'Hanlon Email to A. LeGolvan regarding class certification research
Date:	7/28/2021	0.0	Renee Burbank Review relevant law on notice of disagreement for inclusion in class notice plan and class notices [0.3 eliminated in the exercise of billing judgment]
Date:	7/28/2021	2	Renee Burbank Draft proposed class notices and corresponding inserts to draft notice plan.
Date:	7/28/2021	0.6	Renee Burbank review and draft inserts for draft joint notice plan
Date:	7/29/2021	1.00	Andy Legolvan Email correspondence with the Sullivans and Jenner Block regarding status of Beaudette litigation (0.25); phone call and email correspondence with M. McNabb regarding joint notice plan (0.5), and email correspondence with NVLSP/Public Counsel regarding same (0.25)
Date:	7/29/2021	0.0	Barton F. Stichman Review VA response regarding 2 notice letters and draft correspondence to co-counsel re: arguments to make re: same [0.5 eliminated in the exercise of billing judgment]
Date:	7/29/2021	0.25	Sean Unger Further coordination with A. LeGolvan regarding class coordination efforts
Date:	7/30/2021	0.50	Andy Legolvan Phone call with Public Counsel regarding status of Caregiver legislation and joint notice plan (0.25); email correspondence with NVLSP/Public Counsel regarding same (0.25)
Date:	8/2/2021	1.00	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Review court order denying motion for en banc review (0.25); email correspondence with Paul Hastings team, Public Counsel, and NVLSP regarding same (0.25); conduct legal research regarding impact on litigation schedule (0.25); email correspondence with VA's counsel regarding status of class notice plan (0.25); 1.5 eliminated in the exercise of billing judgment
Date:	8/2/2021	0.0	Randall V. Johnston
			Correspond with I. Timofeyev, A. LeGolvan regarding en banc review denial [0.25 eliminated in the exercise of billing judgment]
Date:	8/3/2021	0.0	Andy Legolvan
			Conference call with Public Counsel and NVLSP regarding status of discussions with VA regarding joint notice plan and strategy for same [1.0 eliminated in the exercise of billing judgment]
Date:	8/3/2021	0.25	Andy Legolvan
			Email correspondence with M. McNabb, VA, regarding joint notice plan
Date:	8/3/2021	0.0	Barton F. Stichman
			team call to discuss case status and strategy re: class notice plan [1.0 eliminated in the exercise of billing judgment]
Date:	8/3/2021	0.0	Christopher G. Murray
			weekly team call to discuss case status and strategy re: class notice plan [0.8 eliminated in the exercise of billing judgment]
Date:	8/3/2021	0.0	Renee Burbank
			team call to discuss case status and strategy re: class notice plan [1.0 eliminated in the exercise of billing judgment]
Date:	8/4/2021	2.00	Andy Legolvan
			Review draft Joint Response and Joint Notice Plan provided by VA and draft comments to same (1.5); email correspondence with NVLSP, VA, and Public Counsel regarding same (0.25); phone call with M. McNabb regarding same (0.25)
Date:	8/4/2021	0.0	Renee Burbank
			Read draft proposed joint notice plan from VAGC [0.4 eliminated in the exercise of billing judgment]
Date:	8/5/2021	7.25	Andy Legolvan
			Further draft Joint Response and Joint Notice Plan in preparation for filing (3.25); conference with VA regarding same (2.0); phone call with co-counsel in preparation for conference with VA regarding same (2.0)
Date:	8/5/2021	0.0	Christopher G. Murray
			Conference call w/co-counsel re: Joint Notice Plan [2.0 eliminated in the exercise of billing judgment]
Date:	8/5/2021	0.0	Christopher G. Murray
			Conference calls w/VA re: Joint Notice Plan [2.0 eliminated in the exercise of billing judgment]
Date:	8/5/2021	1	Renee Burbank
			Review and draft inserts to draft joint notice plan and enclosures
Date:	8/5/2021	0.0	Renee Burbank
			Videoconference with lead counsel reagrding negotiation strategy and proposed changes to joint notice plan [2.0 eliminated in the exercise of billing judgment]
Date:	8/5/2021	2	Renee Burbank
			teleconference call with lead counsel and VAGC regarding Joint notice plan
Date:	8/5/2021	0.7	Renee Burbank

Date:	Work Date	Hours Worked	Timekeeper Name
			drafting and reviewing additional inserts and changes to joint notice plan and enclosures after discussion with VAGC
Date:	8/5/2021	0.0	Renee Burbank videoconference with lead and co-counsel to finalize joint notice plan for filing [0.4 eliminated in the exercise of billing judgment]
Date:	8/9/2021	0.75	Andy Legolvan Review VA's en banc motion and prepare for upcoming call with Richard Sauber (VA GC) regarding status of litigation
Date:	8/9/2021	0.1	Barton F. Stichman Review en banc VA motion to prepare for settlement Conf w/ Dick Sauber VA GC (0.1) [Additional 0.2 eliminated in the exercise of billing judgment]
Date:	8/9/2021	0.0	Renee Burbank Read and reply to emails from lead counsel and VAGC re: scheduling call w/ VAGC [0.1 eliminated in the exercise of billing judgment]
Date:	8/10/2021	1.50	Andy Legolvan Prepare for and attend call with Richard Sauber (VA GC) regarding status of litigation (0.75); follow-on call with NVLSP and Public Counsel (0.75)
Date:	8/10/2021	0.5	Barton F. Stichman FRE 403 settlement conference w/ Dick Saube & Hipolit re: possible settlement and VA position on appeal
Date:	8/10/2021	0.8	Barton F. Stichman videoconference with co-counsel re: litigation strategy in light of call with VAGC
Date:	8/10/2021	0.0	Renee Burbank FRE 403 settlement conference w/ Dick Saube & Hipolit re: possible settlement and VA position on appeal [0.5 eliminated in the exercise of billing judgment]
Date:	8/10/2021	0.0	Renee Burbank videoconference with A. LeGolvan, A. Pertusati, and B. Stichman re: litigation strategy in light of call with VAGC [0.7 eliminated in the exercise of billing judgment]
Date:	8/12/2021	0.25	Andy Legolvan Email correspondence with VA regarding status of class notice (0.25); 0.75 eliminated in the exercise of billing judgment
Date:	8/17/2021	0.75	Andy Legolvan Conference call with Paul Hastings team regarding status of litigation (0.5); conference call with NVLSP and Public Counsel regarding status of litigation an dpossible dual-track appeal forms for class members (0.25)
Date:	8/17/2021	0.3	Renee Burbank conference w/ co-counsel re: case status and possbile dual-track appeal forms for class members; evaluate same
Date:	8/19/2021	0.75	Andy Legolvan Review court order approving joint class notice plan (0.25); correspondence with NVLSP and Public Counsel regarding status of litigation and next steps (0.5); 0.5 eliminated in the exercise of billing judgment
Date:	8/19/2021	0.0	Barton F. Stichman Review of Aug 19, 2021 Court Order [0.2 eliminated in the exercise of billing judgment]
Date:	8/19/2021	0.1	Renee Burbank review court order on joint notice plan and evaluate same

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	8/19/2021	0.0	Renee Burbank
	email correspondence with co-counsel re: court order on notice plan and next steps [0.1 eliminated in the exercise of billing judgment]		
Date:	8/23/2021	0.25	Andy Legolvan
	Email correspondence with VA's counsel regarding status of implementation of class notice order		
Date:	8/24/2021	0.50	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding status of litigation and strategy for next steps in compelling VA to comply with court-ordered notice		
Date:	8/24/2021	0.0	Barton F. Stichman
	Teleconference w/ co-counsel regarding litigation strategy to compel VA to comply with Court ordered notice [0.3 eliminated in the exercise of billing judgment]		
Date:	8/24/2021	0.0	Christopher G. Murray
	Teleconference w/ co-counsel regarding litigation strategy to compel VA to comply with Court ordered notice [0.3 eliminated in the exercise of billing judgment]		
Date:	8/24/2021	0.2	Renee Burbank
	email lead counsel re: recommendations for litigation strategy in light of court order on joint notice plan; evaluate same		
Date:	8/25/2021	0.0	Barton F. Stichman
	conference w/ R. Burbank regarding litigation strategy to compel VA to comply with Court ordered notice [0.1 eliminated in the exercise of billing judgment]		
Date:	8/25/2021	0.0	Renee Burbank
	email correspondence with BFS and C.Murray re: additional potential class representatives requested by VAGC [0.2 eliminated in the exercise of billing judgment]		
Date:	8/25/2021	0.2	Renee Burbank
	conference w/ B. Stichman regarding litigation strategy to compel VA to comply with Court ordered notice; evaluate same		
Date:	8/26/2021	0.25	Andy Legolvan
	Email correspondence with Public Counsel and NVLSP regarding motion to enforce court's order and additional potential class representatives		
Date:	8/26/2021	0.0	Barton F. Stichman
	Review email exchange re status of notice and Beaudette appeal between VAGC and co-counsel [0.2 eliminated in the exercise of billing judgment]		
Date:	8/26/2021	0.0	Renee Burbank
	email correspondence with lead counsel re: additional potential class representatives requested by VAGC [0.1 eliminated in the exercise of billing judgment]		
Date:	8/27/2021	1.50	Andy Legolvan
	Email correspondence with VA regarding motion to enforce court's order (0.25); review draft motion for enforcement prepared by NVLSP (1.0); phone call with caregiver class member regarding status of litigation (0.25)		
Date:	8/31/2021	0.50	Andy Legolvan
	Conference with NVLSP and Public Counsel regarding strategy to complete VA to comply with court-ordered notice		
Date:	8/31/2021	1.75	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Review and revise motion to enforce court's order (1.25); email correspondence with VA regarding motion to enforce (0.25); and phone call with M. McNabb regarding motion to enforce (0.25)
Date:	8/31/2021	0.0	Barton F. Stichman
			teleconference with co-counsel to discuss negotiation strategy to compel VA to comply with Court ordered notice [0.5 eliminated in the exercise of billing judgment]
Date:	8/31/2021	0.0	Christopher G. Murray
			teleconference with co-counsel to discuss negotiation strategy to compel VA to comply with Court ordered notice [0.5 eliminated in the exercise of billing judgment]
Date:	8/31/2021	0.5	Renee Burbank
			teleconference with co-counsel to discuss negotiation strategy to compel VA to comply with Court ordered notice; evaluate same
Date:	9/1/2021	0.50	Andy Legolvan
			Phone call with VA regarding motion for enforcement (0.25); email correspondence with NVLSP and Public Counsel regarding same (0.25)
Date:	9/1/2021	0.2	Renee Burbank
			correspondence with co-counsel re: stipulation with VA on enforcement; evaluate same
Date:	9/2/2021	0.50	Andy Legolvan
			Review stipulation proposed by VA's counsel regarding enforcement of court's injunction (0.25); email correspondence with NVLSP and Public counsel regarding same (0.25)
Date:	9/2/2021	0.4	Renee Burbank
			review VA OGC draft joint filing; evaluate same
Date:	9/3/2021	0.25	Andy Legolvan
			Email correspondence with VA and NVLSP/Public Counsel regarding stipulation proposed by VA's counsel regarding enforcement of court's injunction
Date:	9/3/2021	0.4	Renee Burbank
			draft inserts to VA proposed joint filing
Date:	9/3/2021	0.3	Renee Burbank
			correspondence with VA OGC re: joint filing about notices for new decisions
Date:	9/5/2021	0.50	Andy Legolvan
			Email correspondence with Paul Hastings team regarding discussions with VA relating to stipulation re enforcement of injunction
Date:	9/7/2021	0.50	Andy Legolvan
			Strategy call with NVLSP and Public Counsel regarding class counsel monitoring (0.25); review VA's revisions to stipulation for enforcement of injunction and correspondence with VA's counsel regarding same (0.25)
Date:	9/7/2021	0.0	Renee Burbank
			Conf w/ co-counsel re Class Counsel monitoring [0.2 eliminated in the exercise of billing judgment]
Date:	9/9/2021	0.25	Randall V. Johnston
			Review correspondence from A. Legolvan regarding CAVC order related to compliance with injunction
Date:	9/10/2021	0.75	D. Scott Carlton
			Follow up in connection with general counsel of VA's outreach
Date:	9/13/2021	0.25	Andy Legolvan
			Email correspondence with VA regarding status of Beaudettes' individual Board appeal and potential motion practice regarding same

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	9/14/2021	3.00	Andy Legolvan
	Conduct legal research regarding potential motion for compel processing of the Beaudettes' individual Board appeal (1.0); draft outline regarding same (1.0); phone call with M. McNabb, VA, regarding same (0.25); weekly strategy call with NVLSP and Public Counsel (0.25)		
Date:	9/14/2021	0.0	Barton F. Stichman
	Conf w/ Andy G, Amanda P, & Renee B re Class Counsel monitoring [0.2 eliminated in the exercise of billing judgment]		
Date:	9/14/2021	0.1	Barton F. Stichman
	communications with class member re: status of case		
Date:	9/15/2021	1.25	Andy Legolvan
	Review draft class notice forms prepared by VA (0.75); email correspondence with NVLSP, Public Counsel, and VA regarding same (0.5)		
Date:	9/15/2021	0.4	Barton F. Stichman
	Review of legacy NOD form and request for records form sent to class counsel by VAGC for comment		
Date:	9/15/2021	0.3	Renee Burbank
	review options for class member administration/enforcement related to VA notice		
Date:	9/15/2021	0.2	Renee Burbank
	review and draft inserts to co-counsel on VA draft forms for notice		
Date:	9/17/2021	0.50	Andy Legolvan
	Review draft notices from VA and email correspondence with VA regarding same (0.25); email correspondence with NVLSP and Public Counsel regarding same (0.25)		
Date:	9/17/2021	1.1	Barton F. Stichman
	Review of VAGC email justifying removal of VA separate phone # and research for and prep of proposed response to VAGC (0.5). Prepare memo /chart for analyzing appeal options/legal analysis (0.6)		
Date:	9/20/2021	0.50	Andy Legolvan
	Court mandated 30-day status call with VA, NVLSP, and Public Counsel regarding status of class notice compliance		
Date:	9/20/2021	0.0	Barton F. Stichman
	Court-ordered monthly status call with VA OGC [0.5 eliminated in the exercise of billing judgment]		
Date:	9/20/2021	0.4	Barton F. Stichman
	conference w/ NVLSP team regarding mechanism for handling class member inquiries to provide in court-ordered class notice		
Date:	9/20/2021	0.0	Christopher G. Murray
	Court-ordered monthly status call with VA OGC [0.5 eliminated in the exercise of billing judgment]		
Date:	9/20/2021	0.1	Renee Burbank
	read and respond to emails related to OGC changes to draft notice letter		
Date:	9/20/2021	0.4	Renee Burbank
	Court-ordered monthly status call with VA OGC regarding class notice and VA compliance w/ providing notice		
Date:	9/22/2021	1.25	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding status of class notice compliance		
Date:	9/22/2021	0.0	Barton F. Stichman

Date:	Work Date	Hours Worked	Timekeeper Name
	Conf. w/ Amanda, Andy G, Renee B to discuss handing class member intake as a result of notice letter[1.0 eliminated in the exercise of billing judgment]		
Date:	9/22/2021	1	Renee Burbank
	Call with co-counsel re: options on claims administration; evaluate same		
Date:	9/23/2021	0.75	Andy Legolvan
	Phone call and email correspondence with potential claims administrator (0.5); email correspondence with NVLSP and Public Counsel regarding same (0.25)		
Date:	9/23/2021	0.0	Barton F. Stichman
	Analyze options for claims administration and how to handle class member intake[0.2 eliminated in the exercise of billing judgment]		
Date:	9/23/2021	0.4	Renee Burbank
	Provide advice for a Beaudette class member seeking to appeal to BVA		
Date:	9/23/2021	0.3	Renee Burbank
	review and draft comments on preliminary claims administration estimates		
Date:	9/24/2021	0.75	D. Scott Carlton
	Review status of action and class notice issues		
Date:	9/29/2021	0.50	Andy Legolvan
	Email correspondence with counsel for VA regarding status update to court re notice (0.25); review status update and email correspondence with Paul Hastings team regarding same (0.25)		
Date:	9/29/2021	0.25	Randall V. Johnston
	Review correspondence from A. Legolvan regarding status report related to appeals notices		
Date:	10/1/2021	1.25	Andy Legolvan
	Prepare for and attend conference call with NVLSP and Atticus claims administrator (0.75); phone call with B. Stichman regarding class action strategy (0.25); email correspondence with Paul Hastings team regarding same (0.25)		
Date:	10/5/2021	1.00	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding preparation for class notice and class administrator (0.5); email correspondence with Atticus and NVLSP/Public Counsel regarding claims administration and review scope of work from Atticus (0.5)		
Date:	10/5/2021	0.5	Barton F. Stichman
	Conference with Amanda, Andy G, Renee B regarding preparations for notice and class administrator, evaluate same		
Date:	10/6/2021	0.25	Andy Legolvan
	Review entry of judgment in Beaudette and email correspondence with NVLSP/Public Counsel and Paul Hastings team regarding same		
Date:	10/7/2021	1.00	D. Scott Carlton
	Review and analyze entry of judgment and update from A. LeGolvan regarding appeal		
Date:	10/7/2021	-	Randall V. Johnston
	0.25 eliminated in the exercise of billing judgment		
Date:	10/8/2021	0.2	Renee Burbank
	Review OGC edits to notice letter; evaluate same		
Date:	10/8/2021	0.2	Renee Burbank
	Review BVA notice for individual class member; evaluate same		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	10/11/2021	-	Andy Legolvan
	0.75 eliminated in the exercise of billing judgment		
Date:	10/12/2021	3.25	Andy Legolvan
	Review and revise draft class notice provided by VA's counsel (1.5); email correspondence with VA's counsel regarding same (0.25); email correspondence with Atticus claims administrator regarding vendor agreement (0.5); prepare for and attend conference call with NVLSP and Public Counsel regarding VA's notice letter and preparation for implementation and response mechanism (1.0)		
Date:	10/12/2021	0.0	Barton F. Stichman
	Conference with Amanda M and Andy G and Renee B regarding preparing for implementation and response mechanism and analysis of latest VA draft notice letter[0.9 eliminated in the exercise of billing judgment]		
Date:	10/12/2021	0.9	Renee Burbank
	Teleconference w co-counsel to discuss status of case including OGC edits to notice letter, claims administrator, and individual class member appeals; evaluate same.		
Date:	10/12/2021	0.0	Renee Burbank
	review co-counsel edits to OGC-edited class notice letter[0.1 eliminated in the exercise of billing judgment]		
Date:	10/13/2021	0.1	Renee Burbank
	emails with co-counsel re: litigation strategy in light of judgment issuing; evaluate swame		
Date:	10/14/2021	1.1	Barton F. Stichman
	Participate in VHA discussion of Court's decision and likely problems; evaluate same		
Date:	10/14/2021	0.2	Renee Burbank
	review of VA training handout re: Beaudette; evaluate same		
Date:	10/14/2021	0.3	Renee Burbank
	begin drafting FAQ for claims administration and for communications with individual class members		
Date:	10/15/2021	1.00	Andy Legolvan
	Draft FAQ and script for potential class administrator (0.75); email correspondence with NVLSP and Public Counsel regarding same (0.25)		
Date:	10/18/2021	0.75	Andy Legolvan
	Email correspondence with counsel for VA regarding upcoming call and class notice logistics (0.25); phone call with class member regarding appeal options (0.25); email correspondence with NVLSP regarding status update re Beaudette compliance from VSOs (0.25)		
Date:	10/18/2021	1.4	Barton F. Stichman
	Emails to team re: inform VSOs re: VHA plans; evaluate same (0.5); Research re; 5104 and notice due to caregivers (0.4); send notice letter to VSOs (0.5)		
Date:	10/19/2021	0.50	Andy Legolvan
	Draft internal outline and agenda for upcoming status call with VA (0.25); email correspondence with NVLSP regarding same (0.25)		
Date:	10/19/2021	0.75	Andy Legolvan
	Prepare for and attend weekly call with NVLSP regarding class proceedings and upcoming call with VA		
Date:	10/19/2021	0.75	Andy Legolvan
	Review and revise Atticus contract (0.5); email correspondence with NVLSP regarding same (0.25)		
Date:	10/19/2021	-	Andy Legolvan
	0.5 eliminated in the exercise of billing judgment		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	10/19/2021	0.0	Christopher G. Murray
			call with co-counsel to discuss case status and next steps[0.6 eliminated in the exercise of billing judgment]
Date:	10/19/2021	0.5	Renee Burbank
			call with co-counsel to discuss case status and next steps; evaluate same
Date:	10/20/2021	1.25	Andy Legolvan
			Prepare for and attend monthly conference call with VA regarding notice letter and other pending issues in class proceedings
Date:	10/20/2021	0.0	Barton F. Stichman
			Prep for conf w/ VAGC re: implementation and notice letters [0.1 eliminated in the exercise of billing judgment]
Date:	10/20/2021	0.0	Barton F. Stichman
			conf w/ VAGC re: implementation and notice letters [1.1 eliminated in the exercise of billing judgment]
Date:	10/20/2021	1.1	Renee Burbank
			Call with VA OGC to discuss class notice letter and other pending matters; evaluate same
Date:	10/20/2021	0.2	Renee Burbank
			Analyze whether the parties need Court approval on changes to notice letter (0.2) ; email co-counsel re same [0.1 eliminated in the exercise of billing judgment]
Date:	10/25/2021	0.1	Renee Burbank
			review final edits on class notice; evaluate same
Date:	10/26/2021	0.8	Andy Legolvan
			Conference call with NVLSP regarding status of case and next steps in implementation of court-ordered class notice process (0.5); email correspondence with VA regarding class notice (0.3)
Date:	10/26/2021	0.0	Barton F. Stichman
			Conf w/ Andy G + Renee B to prepare for implementation + open questions w VHA/VAGC[0.5 eliminated in the exercise of billing judgment]
Date:	10/26/2021	0.0	Christopher G. Murray
			Teleconference w/ co-counsel to discuss case status and next steps re: implementation of court-ordered class member notice + open questions w VHA/VAGC [0.8 eliminated in the exercise of billing judgment]
Date:	10/26/2021	0.5	Renee Burbank
			Teleconference w/ co-counsel to discuss case status and next steps re: implementation of court-ordered class member notice + open questions w VHA/VAGC; evaluate same
Date:	10/29/2021	0.25	Andy Legolvan
			Email correspondence with potential class member regarding Board appeal rights
Date:	10/31/2021	0.6	Barton F. Stichman
			Research need to modify notice letter to correct deadline
Date:	10/31/2021	0.0	Barton F. Stichman
			email to co-counsel re: need to modify notice letter to correct deadline [0.4 eliminated in the exercise of billing judgment]
Date:	11/1/2021	0.75	Andy Legolvan
			Conference with NVLSP and Public Counsel regarding status of class proceedings, notice letter, and appellate rights deadline (0.5)e; phone call with M. McNabb (VA) regarding revisions to class notice and further email correspondence with NVLSP and Public Counsel regarding revisions to class notice (0.25)
Date:	11/1/2021	0.0	Barton F. Stichman

Date:	Work Date	Hours Worked	Timekeeper Name
	Conf w/ Andy, Renee, and Amanda re; amending notice letter re; inaccurate appeal deadline in VA Form 10182 (0.5); Research first letter and prep of amendment to notice to add info on appeal deadline (0.3) [Entire 0.8 eliminated in the exercise of billing judgment]		
Date:	11/1/2021	0.5	Renee Burbank
	Call with co-counsel re: notice letter and appellate rights deadline [0.5 eliminated in the exercise of billing judgment] ; analysis and drafting proposed addition to notice letter re: same (.5)		
Date:	11/1/2021	3.0	Renee Burbank
	draft content for class counsel website for required class notice and for communication with class members		
Date:	11/2/2021	0.50	Andy Legolvan
	Review and revise FAQ for class counsel website (0.25); phone call with NVLSP and Public Counsel regarding class notice status (0.25)		
Date:	11/2/2021	0.0	Barton F. Stichman
	videoconference with co-counsel re: class notice and class communication through FAQs and related notice implementation [0.3 eliminated in the exercise of billing judgment]		
Date:	11/2/2021	0.4	Barton F. Stichman
	Further review of draft Notice letter and draft inserts to notice letter regarding lack of appeal deadline for certain class members		
Date:	11/2/2021	0.0	Renee Burbank
	videoconference with co-counsel re: class notice and class communication through FAQs and related notice implementation [0.3 eliminated in the exercise of billing judgment]		
Date:	11/3/2021	0.25	Andy Legolvan
	Email correspondence with NVLSP, Public Counsel, and VA regarding class notice revisions		
Date:	11/4/2021	0.0	Barton F. Stichman
	Review FAQ for class counsel website [0.4 eliminated in the exercise of billing judgment]		
Date:	11/8/2021	0.0	Barton F. Stichman
	review inserts to class member FAQs for class counsel website [0.2 eliminated in the exercise of billing judgment]		
Date:	11/8/2021	0.5	Renee Burbank
	review and draft inserts to Class Counsel claims administration website material		
Date:	11/12/2021	0.5	Renee Burbank
	email correspondence with claims administrator providing inserts and changes to class counsel website		
Date:	11/12/2021	0.2	Renee Burbank
	Correspondence with VA General Counsel regarding class counsel website		
Date:	11/15/2021	0.50	D. Scott Carlton
	Review update on finalizing the class counsel website to provide FAQ and review website related to same		
Date:	11/15/2021	0.25	Randall V. Johnston
	Review correspondence from A. LeGolvan regarding class counsel website		
Date:	11/15/2021	1.5	Renee Burbank
	review and draft inserts for claims administration website draft		
Date:	11/15/2021	0.0	Renee Burbank
	correspondence w/ co-counsel regarding inserts for claims administration website draft [0.2 eliminated in the exercise of billing judgment]		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	11/16/2021	0.50	Andy Legolvan
	Conference call with with NVLSP and Public Counsel regarding class proceedings and next steps on class administration and website		
Date:	11/16/2021	0.0	Barton F. Stichman
	teleconference with co-counsel re: case status and next steps on class administration and website [0.5 eliminated in the exercise of billing judgment]		
Date:	11/16/2021	0.25	Randall V. Johnston
	Review correspondence from B. Sher, A. LeGolvan regarding class counsel website		
Date:	11/16/2021	0.0	Renee Burbank
	teleconference with co-counsel re: case status and next steps on class administration and website [0.5 eliminated in the exercise of billing judgment]		
Date:	11/16/2021	0.3	Renee Burbank
	email correspondence with OGC counsel re: class notice rollout		
Date:	11/16/2021	0.25	Sean Unger
	Review correspondence regarding website banner and notice program		
Date:	11/17/2021	0.50	Andy Legolvan
	Email correspondence with VA, NVLSP, Public Counsel and Atticus regarding class notice and website finalization (0.25); review VA's notice to the Court regarding compliance with class notice deadlines (0.25)		
Date:	11/17/2021	0.50	D. Scott Carlton
	Review updated status regarding VA's court-imposed deadline to begin sending out notices of Board appeal rights to the approximate 400,000 class members		
Date:	11/17/2021	0.2	Renee Burbank
	emails with VA OGC and class administrator re: class counsel website		
Date:	11/17/2021	0.25	Sean Unger
	Review and follow up on notice program and coordinate with A. Legolvan		
Date:	11/18/2021	0.0	Barton F. Stichman
	Review of VA "toolkit" and other docs (.4) and send with comment to AG, RB and AP [0.1 eliminated in the exercise of billing judgment]		
Date:	11/22/2021	0.50	Andy Legolvan
	Email correspondence with NVLSP and Public Counsel regarding status of class notice (0.25); phone call with caregiver class member (0.25)		
Date:	11/22/2021	1	Renee Burbank
	Draft inserts for revised content for website		
Date:	11/24/2021	0.50	Andy Legolvan
	Email correspondence with Paul Hastings team, NVLSP, Public Counsel, and DOJ regarding appeal of Beaudette decision		
Date:	11/24/2021	0.25	D. Scott Carlton
	Review and analyze update regarding VA appealing the merits decision in Beaudette		
Date:	11/24/2021	0.50	Kurt W. Hansson
	Review and analyze VA's appeal of CAVC decision		
Date:	11/30/2021	1.00	Andy Legolvan
	Call with NVLSP and Public Counsel regarding status of litigation, case strategy, and next steps (0.75); email correspondence with VA's counsel regarding status of class procedures (0.25)		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	11/30/2021	0.0	Barton F. Stichman
	Conference with Andy G, Renee B and Amanda P re: seeking class member names and addresses [0.7 eliminated in the exercise of billing judgment]		
Date:	11/30/2021	0.7	Renee Burbank
	call w/ A. Pertusati, B. Stichman, and A. LeGolvan re: case strategy and next steps; evaluate same		
Date:	12/9/2021	1.75	Andy Legolvan
	Draft joint motion to add additional named petitioner and class representative in Beaudette (1.5); email correspondence with NVLSP and Public Counsel regarding same (0.25)		
Date:	12/9/2021	0.75	Andy Legolvan
	Prepare for and attend call with NVLSP regarding upcoming call with VA's counsel regarding Beaudette class (0.75); 0.5 eliminated in the exercise of billing judgment		
Date:	12/9/2021	0.75	Andy Legolvan
	Prepare for and attend call with VA's counsel regarding Beaudette class		
Date:	12/9/2021	0.0	Barton F. Stichman
	Conference with Andy G and Renee B to prepare for regular status call with VAGC (0.7); Status call with VAGC, Andy G and Renee B (0.6) [Entire 1.3 eliminated in the exercise of billing judgment]		
Date:	12/9/2021	1	Renee Burbank
	Court-ordered monthly status call with VA OGC regarding class notice and VA compliance w/ providing notice; evaluate same		
Date:	12/9/2021	1.3	Renee Burbank
	call with A. LeGolvan and B. Stichman re: outstanding Beaudette implementation issues and matters to be raised with VA OGC; evaluate same (0.7); status call with VA OGC; evaluate same (0.6)		
Date:	12/14/2021	1.50	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding status of class action and joint motion to add additional petitioner (1.0); further draft joint motion to add additional petitioner in Beaudette and email correspondence with VA's counsel regarding same (0.5)		
Date:	12/14/2021	0.2	Renee Burbank
	review and draft inserts to draft joint motion to add petitioner		
Date:	12/14/2021	1	Renee Burbank
	conference w/ co-counsel re: case status and draft joint motion to add petitioner		
Date:	12/15/2021	0.75	Andy Legolvan
	Review notice of docketing and related documents regarding the Beaudette Federal Circuit appeal (0.25); email correspondence with NVLSP, Public Counsel, and Paul Hastings team regarding same (0.25); 0.25 eliminated in the exercise of billing judgment		
Date:	12/15/2021	0.25	Randall V. Johnston
	Review correspondence from A. Legolvan regarding case strategy		
Date:	12/15/2021	0.1	Renee Burbank
	review Federal Circuit Entry of Appearance; add insert to same		
Date:	12/15/2021	0.25	Sean Unger
	Review and follow up with A. LeGolvan regarding case strategy		
Date:	12/16/2021	0.25	Andy Legolvan
	Collect information for entry of appearance and statement of interest in the Beaudette federal circuit appeal		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	12/17/2021	0.75	Andy Legolvan
	Review and revise NVLSP draft press release regarding class counsel website		
Date:	12/17/2021	2.00	C. Wendy Phinny
	Draft notices of appearance for CAFC appeal		
Date:	12/20/2021	-	Andy Legolvan
	0.25 eliminated in the exercise of billing judgment		
Date:	12/20/2021	1.00	C. Wendy Phinny
	Review new docket and prepare pleadings for upcoming filings in CAFC		
Date:	12/28/2021	0.50	Andy Legolvan
	Review and revise entry of appearance and certificate of interests in the Beaudette federal circuit appeal (0.25); email correspondence with Paul Hastings team and NVLSP/Public Counsel regarding same (0.25)		
Date:	12/29/2021	2.00	C. Wendy Phinny
	Prepare, finalize, file and distribute entry of appearances and certificate of interest with CAFC		
Date:	12/29/2021	0.25	Michael J. Fisher
	Conduct final review of EOA and certificate of interest filings		
Date:	12/29/2021	0.1	Renee Burbank
	review revised Federal Circuit EOA and Certificate of Interest; evaluate same		
Date:	1/4/2022	0.50	Andy Legolvan
	Prepare for and attend conference call with NVLSP and Public Counsel to discuss Federal Circuit appeal strategy and appeal brief arguments		
Date:	1/4/2022	0.3	Renee Burbank
	analyze arguments for inclusion in Fed Cir appeal		
Date:	1/4/2022	0.5	Renee Burbank
	teleconference w/ co-counsel to Federal Circuit appeal strategy and arguments for inclusion in appeal brief; evaluate same		
Date:	1/5/2022	2.0	D. Scott Carlton
	Review status of litigation, including briefing, decisions, and court orders related to pending appeal		
Date:	1/6/2022	2.00	D. Scott Carlton
	Review status of litigation and appeal strategy related to same		
Date:	1/7/2022	0.25	Sean Unger
	Review correspondence regarding appeal		
Date:	1/13/2022	2.00	D. Scott Carlton
	Review and analyze briefing regarding class issues		
Date:	1/14/2022	0.75	Andy Legolvan
	Review VA's docketing statement in the Beaudette appeal (0.25); draft docketing statement for submission (0.5)		
Date:	1/14/2022	2.50	C. Wendy Phinny
	Prepare, file and distribute docketing statement for CAFC appeal		
Date:	1/19/2022	1.75	D. Scott Carlton
	Review and analyze legal research regarding class certification issues		
Date:	1/25/2022	0.50	Andy Legolvan
	Phone call with NVLSP regarding Federal Circuit appeal strategy and potential arguments		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	1/25/2022	0.5	Renee Burbank
	teleconference w/ co-counsel to Federal Circuit appeal strategy and arguments for inclusion in appeal brief; evaluate same		
Date:	1/26/2022	0.25	Andy Legolvan
	Email correspondence with NVLSP and Public Counsel regarding issues raised by VSOs regarding caregiver appeals process		
Date:	1/27/2022	0.25	Randall V. Johnston
	Correspond with A. Pertusati regarding caregiver call concerning appeals process		
Date:	1/31/2022	0.0	Renee Burbank
	review queries from Public Counsel about class member communications [0.2 eliminated in the exercise of billing judgment]		
Date:	2/1/2022	0.75	Andy Legolvan
	Prepare for and attend weekly call with NVLSP and Public Counsel regarding status of class action proceedings and strategy and arguments for appeal		
Date:	2/1/2022	0.5	Renee Burbank
	teleconference w/ co-counsel to Federal Circuit appeal strategy and arguments for inclusion in appeal brief; evaluate same		
Date:	2/3/2022	1.00	Andy Legolvan
	Email correspondence with NVLSP and M. McNabb (VA's counsel) regarding upcoming status call re Beaudette class proceedings (0.25); email correspondence with NVLSP, Paul Hastings team, and DOJ regarding DOJ's request for extension of time to file brief in Beaudette federal circuit appeal, and review and analyze DOJ's motion (0.25); email correspondence with NVLSP and Paul Hastings team, and draft email to Solicitor General's office regarding Beaudette appeal (0.5)		
Date:	2/4/2022	0.3	Angela Nedd
	Intake call [class member] regarding case status		
Date:	2/4/2022	0.2	Angela Nedd
	Intake call [class member]		
Date:	2/8/2022	0.75	Andy Legolvan
	Call with NVLSP and Public Counsel regarding VA's reporting requirement and upcoming conference with VA		
Date:	2/8/2022	0.0	Barton F. Stichman
	Conference with Andy G, Amanda and Renee B to prepare for 2/9 Meeting with VAGC [0.7 eliminated in the exercise of billing judgment]		
Date:	2/8/2022	0.7	Renee Burbank
	teleconference w/ co-counsel to discuss VA reporting requirement and to prepare for conference with VAGC; evaluate same		
Date:	2/9/2022	1.50	Andy Legolvan
	Prepare for and attend court-ordered conference call with VA's counsel regarding implementation of class notice plan (1.0); draft follow up email correspondence to VA's counsel regarding same (0.5)		
Date:	2/9/2022	0.8	Barton F. Stichman
	Court-ordered conference call with VAGC and co-counsel re: implementation of notice plan		
Date:	2/11/2022	0.25	Andy Legolvan
	Email correspondence with S. Carlton regarding caregiver class member appeals process		
Date:	2/11/2022	1.25	D. Scott Carlton

Date:	Work Date	Hours Worked	Timekeeper Name
			Call with [class member name redacted] regarding joining class action and follow up regarding same
Date:	2/14/2022	-	Andy Legolvan
			0.5 eliminated in the exercise of billing judgment
Date:	2/15/2022	0.50	Andy Legolvan
			Conference call with NVLSP and Public Counsel regarding appeal strategy and class member communications
Date:	2/15/2022	0.1	Angela Nedd
			Caretaker class action referral [class member name redacted]
Date:	2/15/2022	0.0	Barton F. Stichman
			teleconference with co-counsel re: Federal Circuit appeal strategy and class member communications [0.4 eliminated in the exercise of billing judgment]
Date:	2/15/2022	0.4	Renee Burbank
			teleconference with co-counsel re: Federal Circuit appeal strategy and class member communications; evaluate same
Date:	2/18/2022	0.2	Angela Nedd
			Caretaker class action referral [class member name redacted]
Date:	2/22/2022	0.50	Andy Legolvan
			Prepare for and attend weekly status call with NVLSP regarding appeal strategy and class member communications
Date:	2/22/2022	0.0	Barton F. Stichman
			teleconference with co-counsel re: Federal Circuit appeal strategy and class member communications [0.3 eliminated in the exercise of billing judgment]
Date:	2/22/2022	0.3	Renee Burbank
			teleconference with co-counsel re: Federal Circuit appeal strategy and class member communications; evaluate same
Date:	3/1/2022	0.50	Andy Legolvan
			Conference call with NVLSP regarding status of Beaudette class proceedings and appeal
Date:	3/1/2022	0.0	Renee Burbank
			teleconference w/ co-counsel re: case status; evaluate same [0.5 eliminated in the exercise of billing judgment]
Date:	3/8/2022	0.50	Andy Legolvan
			Conference call with NVLSP and Public Counsel regarding status of Beaudette class proceedings and class member inquiries
Date:	3/8/2022	0.0	Barton F. Stichman
			Conf with Paul Hastings, Public Counsel and Renee B re; status update and answers to Qs from class members [0.5 eliminated in the exercise of billing judgment]
Date:	3/8/2022	1	Renee Burbank
			teleconference with co-counsel re: case status and class member inquiries; evaluate same (.5); respond to Class member inquiry (.5)
Date:	3/14/2022	1.00	Andy Legolvan
			Review and revise motion to add [class member name redacted] as additional named petitioner and class representative
Date:	3/15/2022	0.50	Andy Legolvan
			Conference call with NVLSP and Public Counsel regarding status of class proceedings and motion to add [class member name redacted]

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	3/15/2022	0.50	Andy Legolvan
	Review and revise motion to add [class member name redacted] as additional named petitioner and class representative (0.25); email correspondence with VA's counsel regarding same (0.25)		
Date:	3/15/2022	0.0	Barton F. Stichman
	call w/ co-counsel to discuss case status and joint motion re: [class member name redacted] [0.4 eliminated in the exercise of billing judgment]		
Date:	3/15/2022	0.2	Renee Burbank
	call w/ co-counsel to discuss case status and joint motion re: [class member name redacted]		
Date:	3/18/2022	0.50	Andy Legolvan
	Phone call with class member regarding caregiver appeal		
Date:	3/18/2022	0.1	Renee Burbank
	read and respond to email from VA OGC re: class member BVA appeal status		
Date:	3/18/2022	0.1	Renee Burbank
	email class member re: status update on BVA appeal		
Date:	3/23/2022	1.6	Angela Nedd
	Caretaker program contact: five class members [names redacted]		
Date:	3/28/2022	0.5	Angela Nedd
	caregiver class action contact [three class member names redacted]		
Date:	3/30/2022	0.50	Andy Legolvan
	Conference call with NVLSP and Public Counsel regarding status of class proceedings, litigation strategy, and questions for VA OGC		
Date:	3/30/2022	0.0	Barton F. Stichman
	Conference with Andy, Amanda, and Renee re; litigation strategy - questions to VAGC [0.5 eliminated in the exercise of billing judgment]		
Date:	3/30/2022	0.5	Renee Burbank
	draft correspondence to VA OGC re: Beaudette class member appeals status		
Date:	3/31/2022	0.25	Andy Legolvan
	Email correspondence with Solicitor General's office and VA's OGC office regarding Beaudette appeal		
Date:	3/31/2022	0.2	Renee Burbank
	draft inserts to draft email to VA OGC re: class member appeal & remand status (.1); correspondnece to VA OGC re: same (.1)		
Date:	4/1/2022	0.25	Andy Legolvan
	Email correspondence with SG's office and DOJ's office regarding appeal and briefing schedule		
Date:	4/4/2022	0.75	Andy Legolvan
	Phone call with class member regarding status of Board appeal (0.5); email correspondence with Paul Hastings, NVLSP, and Public Counsel regarding same (0.25)		
Date:	4/4/2022	0.50	Randall V. Johnston
	Correspond with B. Moran, A. Legolvan regarding response to caregiver calls		
Date:	4/5/2022	0.25	Andy Legolvan
	Email correspondence with NVLSP regarding class member Board appeal status		
Date:	4/20/2022	1.00	Andy Legolvan

Date:	Work Date	Hours Worked	Timekeeper Name
			Review and analyze recent Federal Circuit precedent regarding All Writs Act/502 petitions and the Caregiver Program to determine impact on Beaudette appeal strategy
Date:	4/21/2022	0.75	Andy Legolvan
			Email correspondence with NVLSP, Public Counsel, and VA OGC regarding upcoming Beaudette class conference call (0.5); email correspondence with Paul Hastings team regarding Beaudette appeal strategy (0.25)
Date:	4/21/2022	3.75	Andy Legolvan
			Further review and analyze recent Federal Circuit precedent regarding All Writs Act/502 petitions and the Caregiver Program to determine impact on Beaudette appeal strategy (0.75); develop strategy for response to jurisdictional challenge (3.0)
Date:	4/22/2022	4.75	Andy Legolvan
			Further review and analyze Federal Circuit precedent regarding All Writs Act/502 petitions and determine impact on Beaudette appeal strategy (1.25); draft memorandum regarding same (3.5)
Date:	4/29/2022	0.75	Andy Legolvan
			Prepare for and attend regular class proceeding call with VA OGC
Date:	5/10/2022	0.25	Andy Legolvan
			Email correspondence with NVLSP, Public Counsel, and Paul Hastings team regarding VA decision granting Beaudettes' caregiver benefits (0.25); 0.5 eliminated in the exercise of billing judgment
Date:	5/10/2022	0.25	Randall V. Johnston
			Correspond with PH team regarding benefits determination
Date:	5/15/2022	0.50	Sean Unger
			Review orders and follow up with A. LeGolvan regarding case status and strategy
Date:	5/17/2022	1.00	Andy Legolvan
			Conference call with NVLSP and Public Counsel regarding class proceedings and Federal Circuit litigation strategy
Date:	5/17/2022	0.0	Barton F. Stichman
			Conference with co-counsel to discuss Federal Circuit litigation strategy [1.0 eliminated in the exercise of billing judgment]
Date:	5/17/2022	1	Renee Burbank
			Call w/ co-counsel to discuss Federal Circuit litigation strategy; evaluate same
Date:	5/17/2022	0.0	Renee Burbank
			email to OGC re: status call [0.1 eliminated in the exercise of billing judgment]
Date:	5/25/2022	0.5	Barton F. Stichman
			Review of [class member] decision on remand to VHA
Date:	6/1/2022	0.25	Igor V. Timofeyev
			Correspondence with co-counsel regarding Beaudette reinstatement decision
Date:	6/1/2022	1	Renee Burbank
			communications with co-counsel and OGC re: finalization and signatures for motion to add petitioner
Date:	6/2/2022	0.2	Renee Burbank
			email w/ OGC approving motion filing
Date:	6/3/2022	0.75	Igor V. Timofeyev
			Correspondence with co-counsel and team regarding status conferences (0.25); review motion to add class representatives and related correspondence (0.5)

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	6/6/2022	-	Michael J. Fisher
			0.5 eliminated in the exercise of billing judgment
Date:	6/7/2022	0.0	Barton F. Stichman
			E-mails with Igor T re; gov'n't extension in Federal Circuit [0.1 eliminated in the exercise of billing judgment]
Date:	6/7/2022	0.50	Igor V. Timofeyev
			Correspondence with DOJ's counsel regarding VA's request for extension of time (0.25); correspondence with co-counsel and team regarding same (0.25)
Date:	6/8/2022	0.25	Igor V. Timofeyev
			Review Federal Circuit's order granting extension of time and correspondence with co-counsel and team regarding same (0.25); 0.75 eliminated in the exercise of billing judgment
Date:	6/9/2022	1.00	D. Scott Carlton
			Telephone conference with co-counsel regarding status of actions and strategy (0.5); telephone conference with team regarding same (0.5)
Date:	6/9/2022	1.00	Igor V. Timofeyev
			Conferences with co-counsel and team regarding class action and appeal strategy (1.0); 0.5 eliminated in the exercise of billing judgment
Date:	6/9/2022	0.50	Michael J. Fisher
			Teleconference with co-counsel regarding case status and strategy
Date:	6/9/2022	0.5	Renee Burbank
			conference w/ co-counsel to discuss case status and next steps; evaluate same
Date:	6/10/2022	0.75	Igor V. Timofeyev
			Conference with M. Fisher regarding amicus solicitation request (0.75); 1.0 eliminated in the exercise of billing judgment
Date:	6/10/2022	0.75	Michael J. Fisher
			Attend teleconference with I. Timofeyev strategizing letter soliciting amici support in CAFC
Date:	6/13/2022	0.50	Michael J. Fisher
			Identify research needed for Beaudette CAFC response brief
Date:	6/14/2022	2.00	Elizabeth Elliott
			Legal research regarding legislative and regulatory history of caregiver program for CAFC response brief
Date:	6/14/2022	2.50	Igor V. Timofeyev
			Correspondence with team regarding meeting with Solicitor General's office concerning potential resolution of appeal (0.25); correspondence with Solicitor General's office regarding same (0.25); prepare for same (2.0)
Date:	6/14/2022	0.50	Michael J. Fisher
			Email M. McNabb, VA, re appeals slide deck sent to VSOs
Date:	6/14/2022	0.3	Renee Burbank
			emails w/ co-counsel and VAGC re: VSO briefing slides and comparison to VAGC data provided pursuant to court order
Date:	6/15/2022	0.0	Barton F. Stichman
			Call w/ co-counsel to discuss strategy for 6/16 meeting with Office of Solicitor General re: possible settlement and resolution of case [0.8 eliminated in the exercise of billing judgment]
Date:	6/15/2022	0.0	Barton F. Stichman
			CAVC-ordered monthly meeting with VAGC to discuss CAVC notice compliance/updates [0.5 eliminated in the exercise of billing judgment]

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	6/15/2022	0.75	D. Scott Carlton
	Conference with co-counsel to discuss strategy for conference with Solicitor General's office regarding potential resolution of case		
Date:	6/15/2022	4.00	Igor V. Timofeyev
	Prepare for conference with Solicitor General's Office regarding potential resolution of Beaudette appeal (3.0); conferences with co-counsel and team regarding preparation for same (0.75); correspondence with M. Stewart, Deputy Solicitor General, regarding same (0.25)		
Date:	6/15/2022	1.25	Michael J. Fisher
	Attend internal team call regarding preparation for conference with Solicitor General's office concernign potential resolution of case (0.75); attend external court-ordered monthly meeting with VA OGC to discuss CAVC notice compliance/updates (0.5)		
Date:	6/15/2022	0.8	Renee Burbank
	Call w/ co-counsel to discuss stratgy for 6/16 meeting with Office of Solicitor General re: possible settlement and resolution of case; evaluate same		
Date:	6/15/2022	0.5	Renee Burbank
	CAVC-ordered monthly meeting with OGC to discuss notice compliance/updates; evaluate same		
Date:	6/15/2022	1.00	Sean Unger
	Review recent Supreme Court jurisprudence for impact on appeal		
Date:	6/16/2022	0.0	Barton F. Stichman
	call w/ SG's office to argue against appeal authorization [0.7 eliminated in the exercise of billing judgment]		
Date:	6/16/2022	2.75	Igor V. Timofeyev
	Prepare for conference with Solicitor General's office regarding potential resolution of appeal; (1.75) conference with Solicitor General's office regarding potential resolution of appeal (0.75); conference with NVLSP, Public Counsel, and team regarding same (0.25)		
Date:	6/16/2022	1.00	Michael J. Fisher
	Attend teleconference with Solicitor General to discuss potential resolution of appeal (0.75); conference with team and co-counsel regarding same (0.25)		
Date:	6/16/2022	0.7	Renee Burbank
	call w/ SG's office to argue against appeal authorization		
Date:	6/16/2022	0.3	Renee Burbank
	teleconference w/ co-counsel to discuss case strategy in light of SG meeting; evaluate same		
Date:	6/20/2022	0.25	Igor V. Timofeyev
	Correspondence with DOJ's counsel and team regarding VA's request for further extension		
Date:	6/21/2022	0.25	Igor V. Timofeyev
	Review government's motion for extension of time		
Date:	06/23/2022	0.5	Amanda Pertusati
	Conference with co-counsel regarding status of appeal and associated strategy and class action proceeding and related strategy for outstanding compliance issues		
Date:	6/23/2022	0.0	Barton F. Stichman
	Conference with co-counsel to discuss litigation strategy for appeal and strategy for outstanding compliance issues in CAVC [0.5 eliminated in the exercise of billing judgment]		
Date:	6/23/2022	0.50	D. Scott Carlton

Date:	Work Date	Hours Worked	Timekeeper Name
			Conference with co-counsel and team regarding litigation strategy for appeal and strategy for outstanding CAVC compliance issues
Date:	6/23/2022	0.50	Igor V. Timofeyev
			Conference with co-counsel and team regarding status of appeal and associated strategy and class action proceeding and related strategy for outstanding compliance issues
Date:	6/23/2022	0.50	Michael J. Fisher
			Attend strategy teleconference with co-counsel and team regarding appeal litigation strategy and strategy for outstanding CAVC compliance issues
Date:	6/23/2022	2.75	Michael J. Fisher
			Draft amicus support letter for Beaudette CAFC action [1.0 eliminated in the exercise of billing judgment]
Date:	6/23/2022	0.5	Renee Burbank
			Conference with co-counsel to discuss litigation strategy for appeal and strategy for outstanding compliance issues in CAVC; evaluate same
Date:	6/24/2022	0.25	Igor V. Timofeyev
			Correspondence with M. Fisher regarding amicus solicitation request
Date:	06/30/2022	0.5	Amanda Pertusati
			Conference with co-counsel regarding appeal litigation strategy and outstanding CAVC compliance issues
Date:	6/30/2022	0.50	D. Scott Carlton
			Telephone conference with co-counsel and team regarding appeal litigation strategy and outstanding CAVC compliance issues
Date:	6/30/2022	0.50	Igor V. Timofeyev
			Conference with co-counsel and team regarding appeal strategy and outstanding class action compliance issues
Date:	6/30/2022	0.5	Renee Burbank
			Conference with co-counsel to discuss litigation strategy for appeal and strategy for outstanding compliance issues in CAVC; evaluate same
Date:	6/30/2022	0.2	Renee Burbank
			email to class administrator re: class member notice
Date:	7/1/2022	0.75	Igor V. Timofeyev
			Review joint appendix (0.5); correspondence with opposing counsel regarding same (0.25)
Date:	7/5/2022	2.00	Michael J. Fisher
			Review Secretary's appeal brief [2.0 eliminated in the exercise of billing judgment]
Date:	7/5/2022	0.0	Renee Burbank
			Review VA initial brief [1.6 eliminated in the exercise of billing judgment]
Date:	7/6/2022	1	Barton F. Stichman
			Review of VA's initial brief in Fed. Cir.; outline same
Date:	7/6/2022	0.50	Igor V. Timofeyev
			Review amicus solicitation request (0.25); correspondence with co-counsel regarding same (0.25)
Date:	7/6/2022	0.25	Michael J. Fisher
			Correspond with VA OGC re court-ordered monthly status call
Date:	7/7/2022	0.9	Barton F. Stichman
			Research relevant case law for inclusion in brief in response to VA brief

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	7/7/2022	0.50	Igor V. Timofeyev
	Correspondence with co-counsel regarding amici solicitation		
Date:	7/7/2022	0.5	Renee Burbank
	weekly co-counsel strategy meeting; evaluate same		
Date:	7/8/2022	0.50	Igor V. Timofeyev
	Review VA's opening brief		
Date:	7/11/2022	1.50	Igor V. Timofeyev
	Review VA's opening appeal brief		
Date:	7/11/2022	1.00	Michael J. Fisher
	Research materials for response appeal brief		
Date:	7/12/2022	4.00	Igor V. Timofeyev
	Review VA's opening appeal brief and related case materials (1.5); consider arguments for response brief (1.0); revise request for amicus support (1.5)		
Date:	07/14/2022	0.5	Amanda Pertusati
	Conference with team regarding status of litigation and associated strategy, and regarding strategy and arguments for appeal		
Date:	7/14/2022	0.0	Barton F. Stichman
	conference with co-counsel to discuss VA's Federal Circuit initial brief and arguments for inclusion in response brief [0.4 eliminated in the exercise of billing judgment]		
Date:	7/14/2022	0.0	D. Scott Carlton
	Telephone conference with co-counsel and team regarding status of litigation and associated strategy, and regarding strategy and arguments for appeal [0.5 eliminated in the exercise of billing judgment]		
Date:	07/14/2022	0.5	Daniel Triplett Jr.
	Conference with co-counsel regarding status of litigation and associated strategy, and regarding strategy and arguments for appeal		
Date:	7/14/2022	3.00	Igor V. Timofeyev
	Prepare amicus support request (2.5); conference with co-counsel and team regarding appeal strategy and argument, and class action coordination (0.5)		
Date:	7/14/2022	0.50	Michael J. Fisher
	Strategy teleconference regarding appeal arguments and class action coordination		
Date:	7/14/2022	4.50	Michael J. Fisher
	Research materials for response appeal brief		
Date:	7/14/2022	0.5	Renee Burbank
	conference with co-counsel to discuss VA's Federal Circuit initial brief and arguments for inclusion in response brief; evaluate same		
Date:	7/15/2022	0.25	Igor V. Timofeyev
	Correspondence with co-counsel and team regarding amicus briefing and response appeal brief		
Date:	7/15/2022		Renee Burbank
	1.0 eliminated in the exercise of billing judgment		
Date:	7/18/2022	0.25	Igor V. Timofeyev
	Correspondence with team regarding conference with VA concerning notice compliance and updates		
Date:	07/21/2022	0.7	Amanda Pertusati

Date:	Work Date	Hours Worked	Timekeeper Name
			Conference with co-counsel and team regarding appeal and CAVC proceedings strategy
Date:	07/21/2022	0.7	Daniel Triplett Jr.
			Conference with co-counsel and team regarding appeal and CAVC proceedings strategy
Date:	7/21/2022	0.75	Igor V. Timofeyev
			Conference with co-counsel and team regarding updates in class action and appeal strategy
Date:	7/21/2022	0.25	Michael J. Fisher
			Attend monthly call with OGC regarding notice compliance and updates
Date:	7/21/2022	0.75	Michael J. Fisher
			Strategy teleconference with co-counsel and team regarding appeal and CAVC proceedings
Date:	7/21/2022	0.7	Renee Burbank
			Discussion w/ co-counsel re: strategy for CAVC proceedings; evaluate same (.4) and Fed Cir proceedings; evaluate same (.3)
Date:	7/21/2022	0.5	Renee Burbank
			CAVC-ordered monthly meeting with OGC to discuss notice compliance/updates; evaluate same
Date:	7/21/2022	0.2	Renee Burbank
			review July 2022 PCAFC Update pdf from OGC; evaluate same
Date:	7/26/2022	0.25	Igor V. Timofeyev
			Correspondence with DOJ's counsel regarding extension of time for response brief
Date:	7/28/2022	0.5	Barton F. Stichman
			Conference with Paul Hastings team and RB on motion to strike and other CAVC matters
Date:	7/28/2022	0.5	Renee Burbank
			conference with co-counsel to discuss arguments for inclusion in Federal Circuit response brief
Date:	7/29/2022	0.0	Igor V. Timofeyev
			Prepare motion for extension of time for response brief (2.0); correspondence with opposing counsel and co-counsel regarding same (0.25) [Entire 2.25 eliminated in the exercise of billing judgment]
Date:	8/1/2022	0.0	C. Wendy Phinny
			Finalize, file and distribute motion for extension of time to file response brief in CAFC [0.5 eliminated in the exercise of billing judgment]
Date:	8/1/2022	0.0	Igor V. Timofeyev
			Correspondence with DOJ's counsel regarding extension of time for response appeal brief (0.25); finalize motion for extension of time and supervise filing of same (0.25) [Entire 0.5 eliminated in the exercise of billing judgment]
Date:	8/5/2022	0.9	Barton F. Stichman
			identify and analyze arguments for inclusion in Federal Circuit brief
Date:	8/5/2022	1	Barton F. Stichman
			conference with co-counsel on arguments for inclusion in Federal Circuit brief
Date:	8/5/2022	1.00	Igor V. Timofeyev
			Conference with co-counsel and team regarding response appeal brief arguments
Date:	8/5/2022	1.00	Michael J. Fisher
			Attend teleconference with I. Timofeyev, B. Stichman, and R. Burbank discussing strategy for response brief
Date:	8/11/2022	1.00	Michael J. Fisher

Date:	Work Date	Hours Worked	Timekeeper Name
	Attend teleconference with I. Timofeyev strategizing response to Secretary's opening brief		
Date:	8/11/2022	2.00	Michael J. Fisher
	Work on drafting response brief outline		
Date:	8/12/2022	1.00	Michael J. Fisher
	Work on drafting response brief outline		
Date:	8/18/2022	0.50	Igor V. Timofeyev
	Correspondence with M. Fisher regarding outline for response brief (0.25); correspondence with co-counsel and team regarding case status and next steps (0.25)		
Date:	8/18/2022	2.00	Michael J. Fisher
	Work on research and preparing outline of CAFC response brief		
Date:	8/19/2022		Renee Burbank
	0.3 eliminated in the exercise of billing judgment		
Date:	8/22/2022	3.00	Michael J. Fisher
	Research Colvin rule and applicable statutory canons for CAFC response brief outline		
Date:	8/23/2022	1.25	Igor V. Timofeyev
	Review materials for response appeal brief (0.5); correspondence with M. Fisher regarding outline for response brief (0.25); review same (0.5)		
Date:	8/23/2022	1.75	Michael J. Fisher
	Work on drafting background section of CAFC response brief		
Date:	8/24/2022	4.00	Michael J. Fisher
	Work on drafting background section of CAFC response brief		
Date:	8/26/2022	-	Michael J. Fisher
	0.5 eliminated in the exercise of billing judgment		
Date:	9/2/2022	4.00	Michael J. Fisher
	Work on researching and drafting of Beaudette CAFC response brief		
Date:	9/8/2022	0.25	Igor V. Timofeyev
	Correspondence with co-counsel and team regarding response appeal brief		
Date:	9/14/2022	0.50	Igor V. Timofeyev
	Correspondence with M. Fisher and J. Silvers regarding response appeal brief		
Date:	9/14/2022	1.25	Jake A. Silvers
	Begin to work on background section of response appeal brief		
Date:	09/15/2022	1	Amanda Pertusati
	Conference with co-counsel and team regarding response appeal brief		
Date:	9/15/2022	1.0	Igor V. Timofeyev
	Conference with co-counsel and team regarding response appeal brief [1.0 eliminated in the exercise of billing judgment] ; conference and correspondence with J. Silvers regarding opening appeal brief [0.5 eliminated in the exercise of billing judgment] ; review materials for same (1.0)		
Date:	9/15/2022	0.00	Jake A. Silvers
	Conference with co-counsel and team regarding response appeal brief [1.0 eliminated in the exercise of billing judgment]		
Date:	9/15/2022	6.25	Jake A. Silvers

Date:	Work Date	Hours Worked	Timekeeper Name
			Continue to work on background section of response appeal brief
Date:	9/15/2022	0.0	Renee Burbank
			discuss draft and draft outline with co-counsel [1.0 eliminated in the exercise of billing judgment]
Date:	9/16/2022	3.5	Igor V. Timofeyev
			Conference and correspondence with M. Fisher regarding response appeal brief [1.0 eliminated in the exercise of billing judgment] 0.5 prepare response appeal brief (3.5)
Date:	9/16/2022	0.0	Michael J. Fisher
			Call with I. Timofeyev regarding response brief; [0.5 eliminated in the exercise of billing judgment]
Date:	9/19/2022	0.50	Igor V. Timofeyev
			Review VA's data on Beaudette appeals for response appeal brief
Date:	9/19/2022	1.50	Jake A. Silvers
			Continue to work on background section of response appeal brief
Date:	9/20/2022	2.75	Jake A. Silvers
			Continue to work on background section of response appeal brief
Date:	9/21/2022	2.5	Igor V. Timofeyev
			Prepare response appeal brief (2.25); conference and correspondence with team regarding same; [0.5 eliminated in the exercise of billing judgment]
Date:	9/21/2022	5.0	Jake A. Silvers
			Prepare response appeal brief (5.0); conference with I. Timofeyev regarding same; [1.0 eliminated in the exercise of billing judgment]
Date:	9/22/2022	1.00	Jake A. Silvers
			Continue to prepare response appeal brief
Date:	9/22/2022	0.0	Renee Burbank
			draft inserts for draft motion to extend (Fed Cir) [0.2 eliminated in the exercise of billing judgment]
Date:	9/26/2022	3.00	Michael J. Fisher
			Work on research and drafting of Beaudette CAFC response brief
Date:	9/27/2022	0.25	Jake A. Silvers
			Continue to prepare response appeal brief
Date:	9/27/2022	5.00	Michael J. Fisher
			Work on research and drafting of Beaudette CAFC response brief; [1.0 eliminated in the exercise of billing judgment]
Date:	9/28/2022	3.00	Michael J. Fisher
			Work on research and drafting of Beaudette CAFC response brief
Date:	09/29/2022	0.5	Amanda Pertusati
			Conference with co-counsel regarding response appeal brief and upcoming discussion with VA concerning notice implementation
Date:	9/29/2022	0.5	Barton F. Stichman
			Conference with co-counsel regarding issues to discuss in our Fed. Cir. brief and meeting with VAGC; evaluate same
Date:	9/29/2022	0.50	D. Scott Carlton
			Telephone conference with co-counsel and team regarding preparation of response appeal brief and status meeting with VA regarding notice implementation

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	9/29/2022	1.50	Igor V. Timofeyev
	Conference with co-counsel and team regarding response appeal brief and upcoming discussion with VA concerning notice implementation (0.5); prepare response appeal brief (1.0)		
Date:	9/29/2022	0.50	Jake A. Silvers
	Attend internal strategy conference regarding response appeal brief and upcoming meeting with VA concerning notice implementation		
Date:	9/30/2022	3.00	Michael J. Fisher
	Work on research and drafting of Beaudette CAFC response brief; [2.0 eliminated in the exercise of billing judgment]		
Date:	10/4/2022	0.0	Barton F. Stichman
	monthly status call w/ VA OGC pursuant to CAVC order - discuss outstanding Qs re: Beaudette implementation [0.5 eliminated in the exercise of billing judgment]		
Date:	10/4/2022	1.0	Igor V. Timofeyev
	Conference with VA regarding CAVC decision's implementation (0.5); prepare for same (0.5); correspondence with co-counsel regarding same; [0.5 eliminated in the exercise of billing judgment]		
Date:	10/4/2022	0.75	Jake A. Silvers
	Attend strategy session with VA OGC regarding notice plan implementation (0.5); prepare summary of same (0.25)		
Date:	10/4/2022	0.25	Jake A. Silvers
	Continue to work on drafting response appeal brief		
Date:	10/4/2022	0.50	Michael J. Fisher
	Attend monthly call with OGC regarding notice plan implementation		
Date:	10/4/2022	6.00	Michael J. Fisher
	Work on research and drafting of Beaudette CAFC response brief		
Date:	10/4/2022	0.5	Renee Burbank
	monthly status call w/ VA OGC pursuant to CAVC order - discuss outstanding Qs re: Beaudette implementation		
Date:	10/5/2022	2.00	Michael J. Fisher
	Work on research and drafting of Beaudette CAFC response brief		
Date:	10/6/2022	0.50	Igor V. Timofeyev
	Correspondence with co-counsel and team regarding response appeal brief		
Date:	10/6/2022	2.00	Michael J. Fisher
	Work on research and drafting of Beaudette CAFC response brief		
Date:	10/12/2022	0.0	D. Scott Carlton
	Review and analyze draft response appeal brief; [1.25 eliminated in the exercise of billing judgment]		
Date:	10/13/2022	0.25	Igor V. Timofeyev
	Correspondence with co-counsel regarding response appeal brief		
Date:	10/19/2022	0.0	Barton F. Stichman
	correspondence w/ co-counsel regarding motion for extension in Fed Cir [0.1 eliminated in the exercise of billing judgment]		
Date:	10/19/2022	1.50	C. Wendy Phinny
	Finalize, file and distribute motion for extension of time in CAFC proceeding		

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	10/19/2022	2.00	Igor V. Timofeyev
	Correspondence with co-counsel regarding response brief and extension of time (0.25); correspondence with DOJ regarding extension of time (0.25); prepare motion for extension of time and supervise filing of same (1.5)		
Date:	10/20/2022	1.50	Igor V. Timofeyev
	Prepare response appeal brief (1.25); correspondence with team regarding same (0.25)		
Date:	10/21/2022	2.00	Igor V. Timofeyev
	Prepare response appeal brief		
Date:	10/24/2022	4.00	Michael J. Fisher
	Work on cite check and proof of introduction and pre-drafted argument sections		
Date:	10/25/2022	2.50	Igor V. Timofeyev
	Prepare response appeal brief		
Date:	10/26/2022	2.25	Igor V. Timofeyev
	Prepare response appeal brief		
Date:	10/27/2022	1.5	Barton F. Stichman
	Review partial Federal Circuit draft and draft inserts for inclusion in argument		
Date:	10/27/2022	3.25	Igor V. Timofeyev
	Prepare response appeal brief (3.0); correspondence with co-counsel and team regarding same (0.25)		
Date:	10/27/2022	0.75	Jake A. Silvers
	Prepare response appeal brief		
Date:	10/28/2022	2.50	Igor V. Timofeyev
	Prepare response appeal brief (2.0); research for same (0.5)		
Date:	10/31/2022	2.00	Igor V. Timofeyev
	Prepare response appeal brief		
Date:	11/1/2022	1.75	Igor V. Timofeyev
	Prepare response appeal brief		
Date:	11/2/2022	1.50	Igor V. Timofeyev
	Prepare response appeal brief (1.25); correspondence with co-counsel and team regarding same (0.25)		
Date:	11/3/2022	0.4	Barton F. Stichman
	Review partial Federal Circuit draft and draft inserts for inclusion in argument		
Date:	11/3/2022	2.25	Igor V. Timofeyev
	Correspondence with co-counsel and team regarding response appeal brief (0.25); prepare response appeal brief (2.0)		
Date:	11/4/2022	3	Barton F. Stichman
	Draft inserts for inclusion in argument section of brief		
Date:	11/4/2022	2.00	Igor V. Timofeyev
	Prepare response appeal brief		
Date:	11/7/2022	8.00	Igor V. Timofeyev
	Prepare response appeal brief (7.0); review co-counsel's suggestions to response appeal brief (1.0)		
Date:	11/7/2022	0.50	Jake A. Silvers
	Continue to work on draft appeal brief		
Date:	11/7/2022	0.0	Renee Burbank

Date:	Work Date	Hours Worked	Timekeeper Name
			review B. Stichman inserts to draft brief [0.7 eliminated in the exercise of billing judgment]
Date:	11/8/2022	6.25	Igor V. Timofeyev
			Prepare response appeal brief (6.0); correspondence with team regarding same (0.25)
Date:	11/8/2022	0.50	Jake A. Silvers
			Continue to work on draft appeal brief
Date:	11/8/2022	1.00	Michael J. Fisher
			Work on additional research for CAFC response brief
Date:	11/9/2022	7.00	Igor V. Timofeyev
			Prepare response appeal brief (6.75); correspondence with team regarding same (0.25)
Date:	11/9/2022	0.25	Jake A. Silvers
			Continue to work on draft appeal brief
Date:	11/9/2022	3.00	Michael J. Fisher
			Work on additional research and drafting for CAFC response brief
Date:	11/10/2022	6.75	Igor V. Timofeyev
			Prepare response appeal brief (6.5); conference with team regarding same (0.5)
Date:	11/10/2022	0.50	Jake A. Silvers
			Strategy conference regarding response appeal brief
Date:	11/10/2022	6.00	Michael J. Fisher
			Attend internal team call regarding CAFC response brief (0.5); work on finalizing CAFC response brief including appendix and cite check (5.5)
Date:	11/11/2022	3.00	Igor V. Timofeyev
			Revise response appeal brief (2.5); review additional appendix designations (0.5)
Date:	11/12/2022	7.75	Igor V. Timofeyev
			Prepare response appeal brief (7.5); correspondence with co-counsel regarding same (0.25)
Date:	11/13/2022	0.50	Igor V. Timofeyev
			Correspondence with opposing counsel regarding confidentiality issues
Date:	11/14/2022	2.9	Barton F. Stichman
			Continue drafting inserts for inclusion in argument section of brief
Date:	11/15/2022	2.00	Igor V. Timofeyev
			Review co-counsel's comments on response appeal brief (1.5); correspondence with co-counsel and team regarding same (0.5)
Date:	11/15/2022	0.75	Jake A. Silvers
			Continue to work on draft appeal brief
Date:	11/15/2022	0.0	Renee Burbank
			review current draft Fed Cir Brief Draft [1.3 eliminated in the exercise of billing judgment]
Date:	11/15/2022	0.7	Renee Burbank
			review relevant case law for inclusion in Fed Cir brief
Date:	11/15/2022	3	Renee Burbank
			draft inserts for inclusion in Fed Cir brief
Date:	11/16/2022	4.50	Igor V. Timofeyev

Date:	Work Date	Hours Worked	Timekeeper Name
			Revise response appeal brief (4.0); transmit revised version to co-counsel and team (0.25); correspondence with team regarding preparation of response appeal brief (0.25)
Date:	11/17/2022	2	Amanda Pertusati Discussed case with client and co-counsels
Date:	11/17/2022	3.00	C. Wendy Phinny Cite check record cites in reply brief
Date:	11/17/2022	1.00	D. Scott Carlton Review and analyze draft response brief
Date:	11/17/2022	3.75	Jake A. Silvers Continue to work on draft appeal brief
Date:	11/17/2022	5.00	John Lund Cite check caselaw in appellate brief to be filed with the Federal Circuit.
Date:	11/17/2022	4.50	Michael J. Fisher Work on citations, joint appendix, and case cite check for response brief
Date:	11/18/2022	3.75	Anuva V. Ganapathi Citecheck of response appeal brief
Date:	11/18/2022	3.50	C. Wendy Phinny Record cite check brief and work on additions to Joint Appendix
Date:	11/18/2022	3.00	Igor V. Timofeyev Revise response appeal brief (2.25); conference and correspondence with M. Fisher and J. Silvers regarding revisions to appeal brief and preparation of joint appendix (0.25); correspondence with DOJ's counsel regarding confidentiality issues and joint appendix (0.25); correspondence with co-counsel regarding appeal brief (0.25)
Date:	11/18/2022	0.25	Jake A. Silvers Conference with I. Timofeyev and M. Fisher regarding response appeal brief
Date:	11/18/2022	6.00	Michael J. Fisher Work on citations, joint appendix, and case cite check for response brief
Date:	11/19/2022	6.50	Igor V. Timofeyev Revise response appeal brief (6.0); correspondence with team regarding same and joint appendix (0.25); correspondence with co-counsel regarding response appeal brief (0.25)
Date:	11/20/2022	1.8	Barton F. Stichman Review near-final response brief and draft inserts for inclusion in brief
Date:	11/20/2022	3.00	C. Wendy Phinny Update Joint Appendix with new documents and number same
Date:	11/20/2022	6.00	Igor V. Timofeyev Revise response appeal brief (5.5); correspondence with co-counsel and team regarding same (0.25); correspondence with team regarding joint appendix (0.25)
Date:	11/21/2022	0.0	Barton F. Stichman Review R. Burbank inserts to Fed Cir brief [0.2 eliminated in the exercise of billing judgment]
Date:	11/21/2022	3.50	C. Wendy Phinny Finalize, file and distribute appearance and response brief with CAFC
Date:	11/21/2022	7.00	Igor V. Timofeyev

Date:	Work Date	Hours Worked	Timekeeper Name
			Revise and finalize response appeal brief (6.0); conferences and correspondence with co-counsel and team regarding same (0.5); supervise filing of same; review, revise, and finalize additional joint appendix designations (0.5)
Date:	11/21/2022	6.75	Jake A. Silvers
			Continue to work on draft appeal brief, including conference with I. Timofeyev and M. Fisher
Date:	11/21/2022	1.25	John Lund
			Review final draft brief and offer edits for inclusion in filed version.
Date:	11/21/2022	4.00	Michael J. Fisher
			Work on finalizing CAFC response brief for filing
Date:	11/21/2022	1.2	Renee Burbank
			finish drafting inserts to Fed Cir brief
Date:	11/22/2022	0.75	Igor V. Timofeyev
			Correspondence with S. Bae, VA's counsel, and team regarding additional joint appendix designations
Date:	11/23/2022	0.75	Igor V. Timofeyev
			Review NLSVCC's amicus brief
Date:	11/29/2022	0.25	Igor V. Timofeyev
			Correspondence with opposing counsel and co-counsel regarding VA's request for extension of time
Date:	12/01/2022	2	Amanda Pertusati
			Discussed case with client and co-counsels
Date:	12/08/2022	2	Amanda Pertusati
			Discussed case with client and co-counsels
Date:	12/15/2022	0.25	Igor V. Timofeyev
			Correspondence with co-counsel and team regarding status of appeal and next steps
Date:	1/19/2023	0.5	Amanda Pertusati
			Conference with co-counsel regarding recent developments and scheduling court-ordered VAGC call
Date:	1/19/2023	0.4	Barton F. Stichman
			Conf w Paul Hastings and RB re; impact of Skaar and recent developments and scheduling court-ordered VAGC call; evaluate same
Date:	1/19/2023	0.50	Michael J. Fisher
			Conference with co-counsel regarding recent developments and scheduling court-ordered VAGC call
Date:	2/1/2023	0.25	Igor V. Timofeyev
			Correspondence with co-counsel and team regarding upcoming meeting with VA on notice plan implementation
Date:	2/6/2023	0.75	Igor V. Timofeyev
			Telephone conference with VA regarding Beaudette implementation (0.5); review materials for same (0.25)
Date:	2/16/2023	2.00	Igor V. Timofeyev
			Correspondence with co-counsel regarding appeal coordination (0.25); correspondence with opposing counsel and team regarding appendix designations (0.25); review reply brief (1.25); correspondence with co-counsel and tem regarding same (0.25)
Date:	2/17/2023	0.25	Igor V. Timofeyev
			Correspondence with team regarding appendix

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	2/22/2023	1.50	Igor V. Timofeyev
	Review joint appendix (0.75); correspondence with VA's counsel regarding same (0.25); prepare index of additional appendix materials (0.5)		
Date:	2/23/2023	0.0	Barton F. Stichman
	Conf re: merit of VA Reply Brief and oral argument strategy [0.5 eliminated in the exercise of billing judgment]		
Date:	2/23/2023	1.50	Igor V. Timofeyev
	Review VA's reply brief (1.0); conference and correspondence with co-counsel and team regarding same and moot court preparation (0.5)		
Date:	2/23/2023	0.5	Renee Burbank
	T/C with co-counsel re: reply brief and oral argument strategy; evaluate same		
Date:	3/6/2023	0.25	Igor V. Timofeyev
	Correspondence regarding submission of paper briefs to Federal Circuit		
Date:	3/7/2023	1.00	C. Wendy Phinny
	Draft oral argument scheduling response		
Date:	3/8/2023	0.50	Michael J. Fisher
	Attend teleconference with OGC regarding court-ordered implementation reporting data		
Date:	3/9/2023	0.25	Igor V. Timofeyev
	Correspondence with team regarding notice of argument conflicts		
Date:	3/10/2023	0.50	C. Wendy Phinny
	Finalize notice of argument conflicts and file same		
Date:	3/13/2023	0.50	Igor V. Timofeyev
	Review response to notice of oral argument conflicts (0.25); correspondence with team regarding same (0.25)		
Date:	3/16/2023	0.3	Amanda Pertusati
	Correspondence with co-counsel regarding oral argument preparation		
Date:	3/20/2023	2.00	C. Wendy Phinny
	Preparation of materials for oral argument		
Date:	9/8/2023	0.50	Igor V. Timofeyev
	Prepare amended response to notice of conflicts; supervise filing of same		
Date:	10/20/2023	0.50	Igor V. Timofeyev
	Review notice of oral argument (0.25); correspondence with co-counsel and team regarding same (0.25)		
Date:	11/3/2023	0.50	Igor V. Timofeyev
	Prepare and supervise filing of acknowledgement of oral argument (0.25); correspondence with co-counsel regarding same (0.25)		
Date:	11/7/2023	0.50	Igor V. Timofeyev
	Correspondence with co-counsel regarding moot courts and preparation for oral argument		
Date:	11/7/2023	0.0	Renee Burbank
	email to co-counsel re: oral argument and moot strategy [0.1 eliminated in the exercise of billing judgment]		
Date:	11/8/2023	0.50	Igor V. Timofeyev
	Correspondence with co-counsel regarding oral argument preparation		
Date:	11/8/2023	0.0	Renee Burbank

Date:	Work Date	Hours Worked	Timekeeper Name
			read and respond to emails from co-counsel re: oral argument prep and moots [0.2 eliminated in the exercise of billing judgment]
Date:	11/13/2023	0.25	Igor V. Timofeyev Correspondence with co-counsel regarding preparation for oral argument
Date:	11/14/2023	0.25	Igor V. Timofeyev Correspondence with co-counsel regarding preparation for oral argument (0.25); 0.75 eliminated in the exercise of billing judgment
Date:	11/14/2023		Renee Burbank 0.2 eliminated in the exercise of billing judgment
Date:	11/20/2023	-	Igor V. Timofeyev 0.25 eliminated in the exercise of billing judgment
Date:	11/21/2023	2.50	Igor V. Timofeyev Prepare for oral argument
Date:	11/22/2023	3.00	Igor V. Timofeyev Review materials in preparation for oral argument
Date:	11/27/2023	0.25	Courtney A. Hsieh Prepare material for oral argument
Date:	11/27/2023	3.00	Igor V. Timofeyev Prepare for oral argument moot court; correspondence with co-counsel regarding same
Date:	11/28/2023	4.00	Igor V. Timofeyev Review materials in preparation for oral argument moot court (3.75); correspondence with co-counsel regarding same; prepare for moot court (0.25)
Date:	11/29/2023	1.75	Allison Doherty Prepare oral argument preparation materials
Date:	11/29/2023	2	Amanda Pertusati Participate in oral argument moot court with co-counsel
Date:	11/29/2023	4.1	Barton F. Stichman Review Fed. Cir. briefs (2.0); 1st Moot Court w/ Igor T, Paul Hastings, and RB (2.1)
Date:	11/29/2023	6.50	Igor V. Timofeyev Prepare for, and participate in, oral argument moot court
Date:	11/29/2023	0.0	Renee Burbank moot/strategy session with arguing counsel [2.2 eliminated in the exercise of billing judgment]
Date:	11/29/2023	0.0	Renee Burbank travel to moot/strategy session at arguing counsel's office [0.5 eliminated in the exercise of billing judgment]
Date:	11/30/2023	2.50	Igor V. Timofeyev Prepare for oral argument (2.25); correspondence with co-counsel regarding same (0.25)
Date:	11/30/2023	0.3	Renee Burbank Provide background documents and information to arguing counsel for prep for Fed Cir argument
Date:	12/1/2023	2.75	Allison Doherty Prepare oral argument prep materials
Date:	12/1/2023	3.00	Igor V. Timofeyev

Date:	Work Date	Hours Worked	Timekeeper Name
			Prepare for oral argument
Date:	12/2/2023	2.00	Igor V. Timofeyev
			Prepare for oral argument
Date:	12/3/2023	5.00	Igor V. Timofeyev
			Prepare for oral argument moot court
Date:	12/3/2023	3.50	Stephen B. Kinnaird
			Review briefs and statute for moot court
Date:	12/4/2023	3.25	Allison Doherty
			Prepare oral argument prep materials
Date:	12/4/2023	2	Amanda Pertusati
			Participate in oral argument moot court with co-counsel
Date:	12/4/2023	3	Barton F. Stichman
			Travel to Paul Hastings (0.5); moot court w/ Igor T, Steve Kinnard (2.5)
Date:	12/4/2023	6.50	Igor V. Timofeyev
			Prepare for, and participate in, oral argument moot court (3.5); prepare and revise oral argument script (1.0); prepare for oral argument (12.0)
Date:	12/4/2023	2.50	Stephen B. Kinnaird
			Prepare for and attend moot court
Date:	12/5/2023	1.1	Barton F. Stichman
			Conf w/ Igor T. re: oral argument strategy; evaluate same
Date:	12/5/2023	8.00	Igor V. Timofeyev
			Prepare for oral argument (5.0); revise argument script (1.75); conference with B. Stichman regarding oral argument preparation (1.25)
Date:	12/6/2023	2.8	Barton F. Stichman
			Travel to Fed. Cir. (0.5); prep. for oral w/ Igor T (0.8); second seat for oral argument (1.0); and discussion after argument re: supp. Memorandum; evaluate same (0.5)
Date:	12/6/2023	4.50	Igor V. Timofeyev
			Prepare for, and deliver, oral argument (2.5); conference with B. Stichman regarding post-argument supplemental briefing (0.5); listen to portions of oral argument for supplemental briefing preparation (1.0); correspondence with B. Stichman and R. Burbank regarding same (0.5)
Date:	12/6/2023	0.0	Renee Burbank
			review order for supp briefing[0.2 eliminated in the exercise of billing judgment]
Date:	12/7/2023	0.8	Barton F. Stichman
			Research for supp. memo and exchange emails re; supp. memo w/ Igor T
Date:	12/7/2023	7.50	Igor V. Timofeyev
			Listen to oral argument for supplemental brief preparation (0.5); correspondence with co-counsel regarding supplemental brief (0.25); review materials for same (2.0); legal research for same (2.0); prepare supplemental brief (2.0); prepare correspondence to opposing counsel regarding joint letter submission on decision statistics (0.5); correspondence with S. Bae, VA's counsel, regarding same (0.25)
Date:	12/7/2023	2.7	Ryan Kelley
			Research Board decisions on domiciliary care and record in list.
Date:	12/8/2023	2.50	Igor V. Timofeyev

Date:	Work Date	Hours Worked	Timekeeper Name
			Correspondence with B. Stichman regarding joint submission on statistical information (0.25); consider objectives and specifics for same (0.5); correspondence with DOJ's counsel regarding same (0.25); prepare supplemental brief (0.5); research for same (1.0)
Date:	12/8/2023	2.00	Irene Chang Research regulatory history of 38 CFR 20.104(b) for supplemental CAFC brief
Date:	12/8/2023	2.1	Ryan Kelley Research Board decisions on domiciliary care and record in list (2.1).
Date:	12/11/2023	1.4	Barton F. Stichman Draft part of supp. memo due 12/13 at Fed. Cir. and review of RB's edits to same (1.2); Review of Joint Filing draft (0.2)
Date:	12/11/2023	2.75	Igor V. Timofeyev Review and revise VA's joint letter regarding Board review statistics (1.25); correspondence with DOJ's counsel regarding same (0.25); correspondence with co-counsel regarding same (0.25); review co-counsel's suggestions for supplemental brief (0.5); review materials for same (0.5)
Date:	12/11/2023	0.0	Renee Burbank Review summary of Fed Cir oral argument and discuss next steps on supp. briefing w/ BFS[0.3 eliminated in the exercise of billing judgment]
Date:	12/11/2023	0.2	Renee Burbank Review DOJ draft of joint filing on BVA numbers
Date:	12/11/2023	0.0	Renee Burbank research domiciliary care and draft arugment re: same for supplemental brief to Fed Cir[1.4 eliminated in the exercise of billing judgment]
Date:	12/12/2023	6.50	Igor V. Timofeyev Prepare supplemental brief (4.0); correspondence with co-counsel regarding same (0.25); review VA's draft joint submission on appeal statistics (0.25); correspondence with co-counsel regarding same (0.25); review and prepare comments on VA's draft joint submission (1.5); transmit suggested revisions to joint submission to VA's counsel (0.25)
Date:	12/12/2023	0.1	Renee Burbank review and draft inserts on co-counsel's edits to draft joint report to Fed Cir re: BVA statistics
Date:	12/13/2023	1.25	Allison Doherty Review legal and factual citations included in supplemental brief and file with the court
Date:	12/13/2023	0.6	Barton F. Stichman Review of PH draft and draft inserts for supplemental memo (0.6); conf w/ Igor T. re: same [0.2 eliminated in the exercise of billing judgment]
Date:	12/13/2023	3.50	Igor V. Timofeyev Review revised joint submission regarding statistics information (0.5); correspondence with VA's counsel and co-counsel regarding same (0.25); revise same (0.25); revise and finalize supplemental brief (1.75); conference and correspondence with co-counsel regarding same (0.25); review VA's supplemental brief (0.25); correspondence with co-counsel regarding same (0.25)
Date:	12/13/2023	2.00	Javii D. Austin Research and analysis to acquire dictionary entries defining the term domiciliary for supplemental brief
Date:	12/13/2023	0.2	Renee Burbank review and draft inserts for draft supplemental brief re: "domiciliary care" to Fed Cir

Date:	Work Date	Hours Worked	Timekeeper Name
Date:	12/13/2023	0.0	Renee Burbank
	review drafts and emails from co-counsel and opposing counsel re: joint report to Fed Cir[0.2 eliminated in the exercise of billing judgment]		
Date:	12/13/2023	0.1	Renee Burbank
	final review of supplemental brief to Fed Cir		
Date:	12/14/2023	0.0	Igor V. Timofeyev
	Correspondence with printing service regarding filing and service of printed copies of supplemental brief [0.25 eliminated in the exercise of billing judgment]		
Date:	2/27/2024	0.75	Igor V. Timofeyev
	Review Federal Circuit's opinion (0.5); correspondence with co-counsel regarding same (0.25); 2.0 eliminated in the exercise of billing judgment		
Date:	3/1/2024	0.4	Amanda Pertusati
	Preparation of EAJA fee application		
Date:	3/1/2024	0.3	Igor V. Timofeyev
	Preparation of EAJA fee application		
Date:	3/4/2024	1.5	Igor V. Timofeyev
	Preparation of EAJA fee application		
Date:	3/5/2024	0.5	Renee Burbank
	Begin preparation of application for fees		
Date:	3/7/2024	0.8	Igor V. Timofeyev
	Preparation of EAJA fee application		
Date:	3/7/2024	1.00	Justin T. Fleischacker
	Preparation of EAJA fee application		

EXHIBIT B

Change Output Options:

From: To:



include graphs

include annual averages

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Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUURS35ASA0,CUUSS35ASA0

Not Seasonally Adjusted

Series Title: All items in Washington-Arlington-Alexandria, DC-VA-MD-WV, all urban consumers, not seasonally adjusted

Area: Washington-Arlington-Alexandria, DC-VA-MD-WV

Item: All items

Base Period: 1982-84=100

Download:  [.xlsx](#)

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
1996	156.8		158.4		159.0		160.1		160.8		161.2		159.6	158.3	160.8
1997	161.6		161.9		162.1		162.9		163.6		161.8		162.4	162.0	162.8
1998	162.5		163.5		163.6		164.9		165.2		164.5				
1999	165.4		165.9		167.0		168.3		169.8		169.1				
2000	169.8		173.2		172.5		174.8		175.0		175.3				
2001	175.9		177.2		178.0		179.2		180.9		179.5				
2002	180.0		181.9		183.6		184.2		185.8		185.4				
2003	186.3		188.8		188.7		190.2		190.8		190.4				
2004	190.7		192.8		194.1		195.4		196.5		197.2				
2005	198.2		200.4		201.8		202.8		205.6		204.3				
2006	205.6		206.4		209.1		211.4		211.2		210.1				
2007	211.101		214.455		216.097		217.198		218.457		218.331				
2008	220.587		222.554		224.525		228.918		228.871		223.569				
2009	221.830		222.630		223.583		226.084		227.181		226.533				
2010	227.440		228.480		228.628		228.432		230.612		230.531				
2011	232.770		235.182		237.348		238.191		238.725		238.175				
2012	238.994		242.235		242.446		241.744		244.720		243.199				
2013	243.473		245.477		245.499		246.178		247.838		247.264				
2014	247.679		249.591		250.443		250.326		250.634		249.972				
2015	247.127		249.985		251.825		250.992		252.376		251.327		250.664	249.828	251.500
2016	250.807		252.718		254.850		254.305		253.513		253.989		253.422	253.049	253.795
2017	254.495		255.435		255.502		255.518		257.816		257.872		256.221	255.332	257.110
2018	260.219		260.026		261.770		262.016		263.056		261.120		261.445	260.903	261.987
2019	262.304		264.257		265.967		265.170		265.500		265.026		264.777	264.252	265.301
2020	266.433		265.385		265.733		267.287		268.788		268.700		267.157	265.954	268.359
2021	270.535		272.347		275.822		279.099		280.933		284.240		277.728	273.603	281.852
2022	286.678		292.227		296.559		299.937		299.268		300.085		296.117	292.543	299.690
2023	299.149		302.930		305.614		305.273		309.254		308.419		305.317	302.876	307.759
2024	309.961		313.108		315.667										

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Not Seasonally Adjusted

Series Title: All items in Los Angeles-Long Beach-Anaheim, CA, all urban consumers, not seasonally adjusted

Area: Los Angeles-Long Beach-Anaheim, CA

Item: All items

Base Period: 1982-84=100

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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
1996	155.7	156.2	157.3	157.7	157.5	156.7	157.6	157.3	158.2	158.8	158.4	158.3	157.5	156.9	158.1
1997	159.1	159.2	159.8	159.9	159.5	159.4	159.5	159.7	160.5	161.1	160.7	161.2	160.0	159.5	160.5
1998	161.0	161.1	161.4	161.8	162.3	162.2	162.1	162.6	162.6	163.2	163.4	163.5	162.3	161.6	162.9
1999	164.2	164.6	165.0	166.6	166.2	165.4	165.8	166.3	167.2	167.2	167.1	167.3	166.1	165.3	166.8
2000	167.9	169.3	170.7	170.6	171.1	171.0	171.7	172.2	173.3	173.8	173.5	173.5	171.6	170.1	173.0
2001	174.2	175.4	176.2	176.6	177.5	178.9	178.3	178.4	178.8	178.3	178.1	177.1	177.3	176.5	178.2
2002	178.9	180.1	181.1	182.2	182.6	181.9	182.2	183.0	183.4	183.7	184.0	183.7	182.2	181.1	183.3
2003	185.2	186.5	188.2	187.6	186.4	186.3	186.3	186.9	188.2	187.8	187.1	187.0	187.0	186.7	187.2
2004	188.5	190.1	191.5	191.9	193.3	193.7	193.4	193.1	194.5	196.3	196.9	195.2	193.2	191.5	194.9
2005	195.4	197.4	199.2	201.1	201.5	200.7	201.4	203.1	205.8	206.9	205.6	203.9	201.8	199.2	204.5
2006	206.0	207.5	208.5	210.5	212.4	211.1	211.4	211.9	212.9	211.4	211.1	210.6	210.4	209.3	211.6
2007	212.584	214.760	216.500	217.845	218.596	217.273	217.454	217.330	217.697	218.696	219.943	219.373	217.338	216.260	218.416
2008	220.918	221.431	223.606	224.625	226.651	229.033	229.886	228.484	227.449	226.159	222.229	219.620	225.008	224.377	225.638
2009	220.719	221.439	221.376	221.693	222.522	223.906	224.010	224.507	225.226	225.264	224.317	223.643	223.219	221.943	224.495
2010	224.610	224.620	225.483	225.916	226.438	225.877	225.991	226.373	226.048	226.794	225.941	226.639	225.894	225.491	226.298
2011	228.652	229.729	232.241	233.319	233.367	232.328	231.303	231.833	233.022	233.049	232.731	231.567	231.928	231.606	232.251
2012	233.441	234.537	236.941	236.866	237.032	236.025	235.776	237.222	238.104	240.111	237.675	236.042	236.648	235.807	237.488
2013	238.015	239.753	239.995	239.043	239.346	239.223	238.920	239.219	239.611	239.940	238.677	238.742	239.207	239.229	239.185
2014	239.857	241.059	242.491	242.437	243.362	243.528	243.727	243.556	243.623	243.341	241.753	240.475	242.434	242.122	242.746
2015	239.724	241.297	243.738	243.569	246.093	245.459	247.066	246.328	245.431	245.812	245.711	245.357	244.632	243.313	245.951
2016	247.155	247.113	247.873	248.368	249.554	249.789	249.784	249.700	250.145	251.098	250.185	250.189	249.246	248.309	250.184
2017	252.373	253.815	254.525	254.971	255.674	255.275	256.023	256.739	257.890	258.883	259.135	259.220	256.210	254.439	257.982
2018	261.235	263.012	264.158	265.095	266.148	265.522	266.007	266.665	268.032	269.482	268.560	267.631	265.962	264.195	267.730
2019	269.468	269.608	271.311	273.945	274.479	274.380	274.682	274.579	276.054	278.075	277.239	275.553	274.114	272.199	276.030
2020	277.755	278.657	276.589	275.853	276.842	278.121	279.899	280.116	279.366	279.947	280.102	279.560	278.567	277.303	279.832
2021	280.178	281.347	282.648	285.808	287.620	289.218	290.890	291.333	292.209	294.961	296.790	297.925	289.244	284.470	294.018
2022	301.209	302.164	306.679	308.302	310.649	314.072	313.415	313.608	315.033	317.014	314.633	312.601	310.782	307.179	314.384
2023	318.591	317.571	317.873	320.089	320.514	322.055	321.931	324.050	324.984	324.545	323.341	323.456	321.583	319.449	323.718
2024	326.640	328.232	330.671	332.572	332.956										

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 include graphs

 include annual averages

Data extracted on: June 26, 2024 (1:56:11 PM)

Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUURS12ASA0, CUUSS12ASA0
 Not Seasonally Adjusted
Series Title: All items in New York-Newark-Jersey City, NY-NJ-PA, all urban consumers, not seasonally adjusted
Area: New York-Newark-Jersey City, NY-NJ-PA
Item: All items
Base Period: 1982-84=100

Download: [.xlsx](#)

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
1996	164.8	165.7	166.5	166.0	166.4	166.5	166.7	167.2	168.2	168.2	168.4	168.5	166.9	166.0	167.9
1997	169.1	170.1	170.7	170.2	169.9	170.3	170.8	170.8	171.7	172.3	172.0	171.9	170.8	170.1	171.6
1998	172.1	172.7	173.0	173.0	173.0	173.1	173.6	174.2	174.4	174.8	174.7	174.7	173.6	172.8	174.4
1999	175.0	175.1	175.5	176.0	176.1	176.8	177.2	177.6	178.2	178.9	178.8	178.6	177.0	175.8	178.2
2000	179.3	180.5	181.5	181.4	181.4	182.0	182.8	183.1	184.4	184.6	184.6	184.2	182.5	181.0	184.0
2001	184.9	185.3	186.4	186.6	187.3	188.3	187.8	188.1	188.0	187.8	187.8	187.3	187.1	186.5	187.8
2002	188.5	189.9	191.1	191.8	191.4	191.5	192.0	193.1	193.3	193.7	193.4	193.1	191.9	190.7	193.1
2003	194.7	196.2	197.1	196.7	196.8	196.9	197.7	199.1	199.6	200.0	199.4	199.3	197.8	196.4	199.2
2004	199.9	201.1	203.4	204.0	204.4	206.0	205.5	205.7	205.9	207.3	207.2	206.8	204.8	203.1	206.4
2005	208.1	208.9	212.4	212.5	211.4	210.7	212.5	214.1	215.8	216.6	215.3	214.2	212.7	210.7	214.8
2006	215.9	216.4	218.2	220.2	221.6	222.6	223.1	224.1	222.9	221.7	220.9	221.3	220.7	219.2	222.3
2007	221.767	223.066	224.551	225.780	227.146	228.258	228.628	228.326	228.308	228.552	229.504	229.395	226.940	225.095	228.785
2008	229.869	231.020	233.122	233.822	236.151	238.580	240.273	240.550	240.089	238.403	234.498	233.012	235.782	233.761	237.804
2009	233.402	234.663	235.067	235.582	235.975	237.172	237.600	238.282	238.568	238.380	238.777	238.427	236.825	235.310	238.339
2010	238.970	238.862	240.101	240.529	241.075	240.817	241.147	241.569	241.485	241.981	241.960	241.874	240.864	240.059	241.669
2011	242.639	243.832	245.617	246.489	248.073	248.505	249.164	250.058	250.559	250.051	249.317	248.307	247.718	245.859	249.576
2012	249.322	250.285	251.887	252.349	252.652	252.406	252.016	253.472	254.554	254.277	254.285	253.555	252.588	251.483	253.693
2013	254.807	256.234	256.589	255.967	256.270	256.911	257.326	257.659	258.504	257.069	257.377	257.284	256.833	256.130	257.537
2014	259.596	259.019	259.971	259.985	261.225	261.350	261.498	261.075	261.074	260.500	259.382	258.080	260.230	260.191	260.268
2015	258.376	259.240	259.647	259.959	261.066	261.512	261.199	261.347	261.887	261.515	261.009	259.941	260.558	259.967	261.150
2016	260.342	260.875	261.508	262.619	263.312	263.877	263.722	264.160	264.602	264.738	265.203	265.421	263.365	262.089	264.641
2017	266.917	267.662	267.582	267.948	268.183	268.666	268.051	268.657	270.059	269.575	269.381	269.564	268.520	267.826	269.215
2018	270.771	272.214	272.196	272.950	274.001	274.170	274.073	274.441	275.455	275.101	274.478	273.836	273.641	272.717	274.564
2019	275.144	275.823	276.570	277.441	278.068	278.802	278.817	279.428	279.338	279.255	279.468	279.816	278.164	276.975	279.354
2020	282.020	282.577	281.975	280.623	282.092	282.333	283.624	283.478	284.551	284.121	283.291	284.350	282.920	281.937	283.903
2021	285.525	286.474	287.481	289.493	290.991	293.872	293.553	293.927	295.488	296.472	297.490	296.865	292.303	288.973	295.633
2022	300.164	301.151	305.024	307.781	309.243	313.589	312.615	313.280	313.880	314.338	314.975	315.656	310.141	306.159	314.124
2023	318.151	319.295	319.038	319.211	320.002	321.290	322.496	324.380	325.613	325.288	324.520	324.691	321.998	319.498	324.498
2024	328.006	328.606	329.829	331.270	332.633										

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Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUURS49ESA0,CUUSS49ESA0
 Not Seasonally Adjusted
Series Title: All items in San Diego-Carlsbad, CA, all urban consumers, not seasonally adjusted
Area: San Diego-Carlsbad, CA
Item: All items
Base Period: 1982-84=100

Download: [.xlsx](#)

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
1996													160.9	159.8	161.9
1997													163.7	163.7	163.7
1998													166.9	166.0	167.8
1999													172.8	171.7	173.9
2000													182.8	179.8	185.8
2001													191.2	190.1	192.4
2002													197.9	195.7	200.0
2003													205.3	203.8	206.7
2004													212.8	211.4	214.3
2005													220.6	218.3	222.9
2006													228.1	226.7	229.6
2007													233.321	231.870	234.772
2008													242.313	242.440	242.185
2009													242.270	240.885	243.655
2010													245.464	244.242	246.686
2011													252.910	252.451	253.368
2012													256.961	256.637	257.285
2013													260.317	258.955	261.679
2014													265.145	265.251	265.039
2015													269.436	267.346	271.526
2016													274.732	272.628	276.837
2017											285.961		283.012	281.561	284.464
2018	288.331		290.810		289.243		295.185		295.883		293.858		292.547	290.076	295.018
2019	295.761		297.226		300.303		299.333		301.033		301.520		299.433	298.147	300.718
2020	302.564		302.589		301.317		305.611		304.443		306.334		303.932	302.040	305.823
2021	307.688		315.035		317.141		323.906		324.138		326.422		319.761	314.282	325.241
2022	332.990		339.852		343.502		347.462		350.721		348.145		344.416	339.886	348.945
2023	354.453		358.026		361.339		362.412		367.185		366.343		362.022	358.515	365.529
2024	367.917		370.858		372.858										

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Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
1996	152.9	153.2	152.9	153.9	155.1	155.2	155.9	155.6	156.3	156.9	156.9	156.0	155.1	153.9	156.3
1997	157.0	157.9	159.2	159.6	159.8	160.0	160.6	161.2	161.6	162.5	162.6	162.6	160.4	158.9	161.9
1998		163.2		164.6		165.5		166.6		167.2		167.4	165.5	164.2	166.9
1999		169.4		172.2		171.8		173.5		175.2		174.5	172.5	170.8	174.2
2000		176.5		178.7		179.1		181.7		183.4		184.1	180.2	177.7	182.6
2001		187.9		189.1		190.9		191.0		191.7		190.6	189.9	188.7	191.1
2002		191.3		193.0		193.2		193.5		194.3		193.2	193.0	192.3	193.7
2003		197.7		197.3		196.3		196.3		196.3		195.3	196.4	196.8	196.1
2004		198.1		198.3		199.0		198.7		200.3		199.5	198.8	198.2	199.5
2005		201.2		202.5		201.2		203.0		205.9		203.4	202.7	201.5	203.9
2006		207.1		208.9		209.1		210.7		211.0		210.4	209.2	207.9	210.6
2007		213.688		215.842		216.123		216.240		217.949		218.485	216.048	214.736	217.361
2008		219.612		222.074		225.181		225.411		225.824		218.528	222.767	221.730	223.804
2009		222.166		223.854		225.692		225.801		226.051		224.239	224.395	223.305	225.484
2010		226.145		227.697		228.110		227.954		228.107		227.658	227.469	226.994	227.944
2011		229.981		234.121		233.646		234.608		235.331		234.327	233.390	232.082	234.698
2012		236.880		238.985		239.806		241.170		242.834		239.533	239.650	238.099	241.201
2013		242.677		244.675		245.935		246.072		246.617		245.711	245.023	243.894	246.152
2014		248.615		251.495		253.317		253.354		254.503		252.273	251.985	250.507	253.463
2015		254.910		257.622		259.117		259.917		261.019		260.289	258.572	256.723	260.421
2016		262.600		264.565		266.041		267.853		270.306		269.483	266.344	263.911	268.777
2017		271.626		274.589		275.304		275.893		277.570		277.414	274.924	273.306	276.542
2018		281.308		283.422		286.062		287.664		289.673		289.896	285.550	282.666	288.435
2019		291.227		294.801		295.259		295.490		298.443		297.007	295.004	293.150	296.859
2020		299.690		298.074		300.032		300.182		301.736		302.948	300.084	299.109	301.059
2021		304.387		309.419		309.497		311.167		313.265		315.805	309.721	306.724	312.718
2022		320.195		324.878		330.539		328.871		332.062		331.222	327.060	323.408	330.711
2023		337.173		338.496		340.056		340.094		341.219		339.915	339.050	337.689	340.411
2024		345.151		351.247											

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EXHIBIT C

USAO ATTORNEY'S FEES MATRIX — 2015-2021*Revised Methodology starting with 2015-2016 Year*

Years (Hourly Rate for June 1 – May 31, based on change in PPI-OL since January 2011)

Experience	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
31+ years	568	581	602	613	637	665
21-30 years	530	543	563	572	595	621
16-20 years	504	516	536	544	566	591
11-15 years	455	465	483	491	510	532
8-10 years	386	395	410	417	433	452
6-7 years	332	339	352	358	372	388
4-5 years	325	332	346	351	365	380
2-3 years	315	322	334	340	353	369
Less than 2 years	284	291	302	307	319	333
Paralegals & Law Clerks	154	157	164	166	173	180

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (USAO) to evaluate requests for attorney's fees in civil cases in District of Columbia courts. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, or by other Department of Justice components, or in other kinds of cases. The matrix does **not** apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
2. A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *See, e.g., Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). Consistent with that definition, the hourly rates in the above matrix were calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers (PPI-OL) index. The survey data comes from ALM Legal Intelligence's 2010 & 2011 Survey of Law Firm Economics. The PPI-OL index is available at <http://www.bls.gov/ppi>. On that page, under "PPI Databases," and "Industry Data (Producer Price Index - PPI)," select either "one screen" or "multi-screen" and in the resulting window use "industry code" 541110 for "Offices of Lawyers" and "product code" 541110541110 for "Offices of Lawyers." The average hourly rates from the 2011 survey data are multiplied by the PPI-OL index for May in the year of the update, divided by 176.6, which is the PPI-OL index for January 2011, the month of the survey data, and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
3. The PPI-OL index has been adopted as the inflator for hourly rates because it better reflects the mix of legal services that law firms collectively offer, as opposed to the legal services that typical consumers use, which is what the CPI-

Legal Services index measures. Although it is a national index, and not a local one, *cf. Eley v. District of Columbia*, 793 F.3d 97, 102 (D.C. Cir. 2015) (noting criticism of national inflation index), the PPI-OL index has historically been generous relative to other possibly applicable inflation indexes, and so its use should minimize disputes about whether the inflator is sufficient.

4. The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc.* 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore (DC-MD-VA-WV) area. The USAO rates for years prior to and including 2014-15 remains the same as previously published on the USAO's public website.
5. The various "brackets" in the column headed "Experience" refer to the attorney's years of experience practicing law. Normally, an attorney's experience will be calculated starting from the attorney's graduation from law school. Thus, the "Less than 2 years" bracket is generally applicable to attorneys in their first and second years after graduation from law school, and the "2-3 years" bracket generally becomes applicable on the second anniversary of the attorney's graduation (*i.e.*, at the beginning of the third year following law school). See *Laffey*, 572 F. Supp. at 371. An adjustment may be necessary, however, if the attorney's admission to the bar was significantly delayed or the attorney did not otherwise follow a typical career progression. See, *e.g.*, *EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); *EPIC v. Dep't of Homeland Sec.*, 982 F. Supp. 2d 56, 60-61 (D.D.C. 2013) (same). The various experience levels were selected by relying on the levels in the ALM Legal Intelligence 2011 survey data. Although finer gradations in experience level might yield different estimates of market rates, it is important to have statistically sufficient sample sizes for each experience level. The experience categories in the current USAO Matrix are based on statistically significant sample sizes for each experience level.
6. ALM Legal Intelligence's 2011 survey data does not include rates for paralegals and law clerks. Unless and until reliable survey data about actual paralegal/law clerk rates in the D.C. metropolitan area become available, the USAO will compute the hourly rate for Paralegals & Law Clerks using the most recent historical rate from the USAO's former *Laffey* Matrix (*i.e.*, \$150 for 2014-15) updated with the PPI-OL index. The formula is \$150 multiplied by the PPI-OL index for May in the year of the update, divided by 194.3 (the PPI-OL index for May 2014), and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
7. The attorney's fees matrices issued by the United States Attorney's Office are intended to facilitate the settlement of attorney's fees claims in actions in which the United States may be liable to pay attorney's fees to the prevailing party and the United States Attorney's Office is handling the matter. The United States Attorney's Office is presently working to develop a revised rate schedule, based upon current, realized rates paid to attorneys handling complex federal litigation in the District of Columbia federal courts. This effort is motivated in part by the D.C. Circuit's urging the development of "a reliable assessment of fees charged for complex federal litigation in the District." *D.L. v. District of Columbia*, 924 F.3d 585, 595 (D.C. Cir. 2019). This new matrix should address the issues identified by the majority in *D.L.*, but it is expected that it will be some time before a new matrix can be prepared. In the interim, for matters in which a prevailing party agrees to payment pursuant to the matrices issued by the United States Attorney's Office, the United States Attorney's Office will not demand that a prevailing party offer the additional evidence that the law otherwise requires. See *Eley*, 793 F.3d at 104 (quoting *Covington v. District of Columbia*, 57 F.3d 1101, 1109 (D.C. Cir. 1995)) (requiring "evidence that [the] 'requested rates are in line with those prevailing in the community for similar services'").