

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

M.B., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:17-cv-04102-NKL
)	
Steve Corsi, et al.,)	
)	
Defendants.)	

**DECLARATION OF SCOTT T. SCHUTTE
IN SUPPORT OF PLAINTIFFS’ MOTION FOR FEES AND EXPENSES**

I, Scott T. Schutte, hereby declare as follows:

1. I am a partner at the law firm of Morgan, Lewis & Bockius (“Morgan Lewis”) and one of the attorneys for Plaintiffs in the litigation captioned *M.B. et al. v. Corsi et al.*, pending as Case No. 2:17-CV-04102-NKL in the Western District of Missouri, Central Division (the “Missouri Litigation”). I submit this Declaration in support of Plaintiffs’ motion for fees and expenses. I have personal knowledge of the facts stated herein and, if called to testify, could and would testify competently thereto.

Qualifications of Morgan Lewis Attorneys

2. Morgan Lewis is an international law firm with more than 2,000 attorneys in 31 offices around the world.

3. The core team at Morgan Lewis working on the Missouri Litigation included rising partner Stephanie Schuster, associates Ning He and Courtney McCormick, and me. We also have received extensive support from paralegals and employees who work in our e-data group, but as described in Paragraphs 14 and 20 we are not seeking reimbursement of these costs.

4. I am a 1995 graduate of the Chicago-Kent College of Law, where I was the valedictorian and the Editor-in-Chief of the Chicago-Kent Law Review. Immediately after graduating from law school, I clerked for the Hon. Milton I. Shadur in the Northern District of Illinois, and then joined the law firm of Jenner & Block. I spent 11 years at Jenner & Block and four years at Howrey LLP before joining Morgan Lewis in 2011.

5. During my eight years at Morgan Lewis – and, indeed, throughout the 23 years I have practiced law – I have spent much of my time handling class action litigation. I have represented defendants in dozens of complex class action lawsuits, including companies like Walmart, HP, H&R Block, Groupon, Uber, Jones Lang LaSalle, Lands' End, Bed Bath & Beyond, Bank of America and JPMorganChase. While my experience in class action litigation has been primarily on the defense side, I have become intimately familiar with the requirements of Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”). I frequently lecture on issues relating to Rule 23 and state law analogs.

6. I also handle high-exposure complex litigation across a variety of industries and subject matters. For example, in addition to my class action work, I currently am representing (i) a utility with respect to a \$265 million insurance recovery claim; (ii) the owner of a failed futures exchange that claims that its start-up was harmed by the illegal and anti-competitive behavior of two competitors; and (iii) Little League Baseball, Inc. in defending claims regarding discipline imposed against the team that won the 2014 Little League World Series.

7. As set out in Paragraphs 11 and 13 below, one of Morgan Lewis’s primary roles in the Missouri Litigation has been to work on class certification issues. I am one of dozens Morgan Lewis attorneys who spend a significant amount of their time on class action litigation, and I am a co-chair of Morgan Lewis’s class action practice. Morgan Lewis has a recognized brand in class action litigation, including being named a “Powerhouse” firm that is “leading the litigation market” for Class Action Litigation by *BTI Litigation Outlook*. Morgan Lewis also was ranked the “#1 class action firm” or “class action practice group of the year” by *BTI*,

Law360, Chambers, The Recorder, and many others. Two of my partners and I are co-authors of the American Bar Association’s “Practitioner’s Guide to Class Actions.”

8. Stephanie Schuster is an associate in Morgan Lewis’s Appellate Practice Group. She will be promoted to partner on October 1, 2019 when our next fiscal year begins. Stephanie’s practice covers complex appellate, class action and regulatory matters across a range of legal subjects. She has litigated high-profile and high-value issues in the areas of telecommunications, bankruptcy, tax, commercial, insurance, civil rights and constitutional law. Stephanie has worked on appeals in the Second, Fourth, Fifth, Eighth, Ninth and Eleventh Circuits, as well as several state appellate courts. As described more below, Stephanie’s primary role in the Missouri Litigation was to work on the State’s interlocutory appeal of this Court’s class certification ruling. Stephanie is a 2011 graduate of the Georgetown University Law Center.

9. Ning He is a 2015 graduate of the Washington University School of Law. Ning practices primarily in Morgan Lewis’s Securities Enforcement and Litigation Group, where she is involved in the day-to-day management of complex government investigations. As described more fully below, Ning was the lead associate for Morgan Lewis in the Missouri Litigation.

10. Courtney McCormick is a 2010 graduate of Villanova Law School who practices primarily in Morgan Lewis’s toxic tort defense practice. Her roles in the Missouri Litigation included review of documents and deposition preparation.

Morgan Lewis’s Role in the Missouri Litigation

11. Morgan Lewis became involved in the Missouri Litigation shortly after the original complaint was filed in 2017. While prior to the Missouri Litigation I had limited experience in the substantive issues raised by the case (my only prior relevant substantive experience was in a death penalty case that I argued in the Illinois Supreme Court in 1998 involving the effect of a psychotropic medication on a “voluntary” guilty plea), I believed that Morgan Lewis’s – and my – class action experience would be beneficial in prosecuting this important claim. I would not have felt comfortable prosecuting a case of this complexity without

the subject matter expertise of our co-counsel from Children’s Rights (“CR”), the National Center for Youth Law (“NCYL”), as well as the local expertise of John Ammann from the St. Louis University School of Law (“SLU”).

12. From the time we became involved in the Missouri Litigation, our Morgan Lewis team worked closely with our co-counsel from CR, NCYL, and SLU, to develop and implement the strategy for the Missouri Litigation. We managed the many moving parts – dispositive motion briefing, class certification discovery and briefing (including an interlocutory appeal requested by the State), affirmative and defensive merits discovery, and settlement discussions – via tightly structured weekly strategy calls, during which we divided duties to avoid duplication of efforts.

13. For example, while CR and NCYL (specifically, Samantha Bartosz and Bill Grimm) took the lead on all arguments in this Court, my colleague Stephanie Schuster and I took the lead on opposing the State’s Rule 23(f) petition, and briefing and arguing the State’s interlocutory appeal. Morgan Lewis also provided the paralegals and e-data professionals that enabled the Plaintiffs’ Team to assimilate, organize and review more than 1.5 million pages of documents, and also attorney support in reviewing those documents. I also took the lead on several depositions, and our associates were involved in the review and analysis of thousands of pages of documents that were produced by the State.

14. In addition, because Morgan Lewis is frequently called upon to handle document-intensive, complex matters (and I would put the Missouri Litigation in this category), we have an infrastructure in place for storage, organization and review of vast amounts of documents. While we are not seeking reimbursement for these costs as part of this Motion, Morgan Lewis employees spent more than 344 hours (valued at more than \$50,000) creating, organizing and maintaining this document review database.

Morgan Lewis’s Fee and Cost Request

15. Morgan Lewis’s fee application requests reimbursement for approximately 628.5 hours expended on this litigation by the four Morgan Lewis attorneys who were part of our core

team. At the billing rates listed in the table included in Paragraphs 17 and 18 below in this Declaration, the fees for which reimbursement is requested totals \$250,452.50.

16. A spreadsheet listing Morgan Lewis's detailed, itemized time records on which these attorney's fees are based is attached as Exhibit A. This itemization represents a summary compiled from detailed time records maintained in the regular course of the law practice of Morgan Lewis. These time records are maintained on a current basis and in chronological order, showing the date, timekeeper, task performed, and time expended for all work for each entry.

17. The rates we are seeking in this lawsuit are significantly below the standard rates of the core Morgan Lewis team. For example, my standard rate is \$935, which is consistent with what I understand to be the rate of lawyers of my experience level at international law firms. That would be the standard rate for clients if we were handling a matter in Chicago, New York, Los Angeles, Kansas City, St. Louis, or Jefferson City, Missouri. The rate for which we are seeking reimbursement for my time in the Missouri Litigation, however, is \$500 per hour.

18. Similarly:

- a. Stephanie Schuster's standard rate is \$700 per hour; the rate sought here is \$325.
- b. Ning He's standard rate is \$550 per hour; the rate sought here is \$275.
- c. Courtney McCormick's standard rate is \$375 per hour; the rate sought here is \$325.

19. The spreadsheet in Exhibit A does *not* include more than 85 hours expended by other Morgan Lewis attorneys who contributed to this matter but were not part of the "core team" identified above.

20. In addition, the spreadsheet in Exhibit A does not include more than 355 hours expended by paralegals and other employees in Morgan Lewis's e-data team in creating, organizing and maintaining the document database that was used by the entire Plaintiffs' team in prosecuting this lawsuit.

21. Besides conducting an internal review of time entries, Morgan Lewis contracted with Sterling Analytics, Inc., at its own expense, to review and audit their time and expense slips

for reasonableness. In addition to helping corporate clients manage their legal spending through legal bill review and auditing, Sterling Analytics has been retained as experts on the reasonableness of legal fees in both federal and state courts. Their attorneys assist clients in negotiating legal fee disputes, and have authored a law review article on best practices in implementing outside counsel billing guidelines to establish trust and transparency in legal billing. Pursuant to this fee application, Sterling Analytics performed a line-by-line review of the fees and expenses herein to remove and reduce charges that were objectionable, including but not limited to, overtly vague or block-billed descriptions, clerical work, multiple attendance at meetings and hearings, overstaffing of tasks, billing for overhead, long billing days, and excessive time for task.

22. Throughout the litigation, Morgan Lewis made a concerted effort to be efficient and hold down our time. I have supervised staffing levels throughout this litigation and assigned attorneys to tasks only as reasonably necessary to provide suitable representation of Plaintiffs. Throughout this litigation, I made reasonable efforts to balance the workloads of attorneys and paralegals working on this case to ensure that the work assigned to them was commensurate with their level of experience. I believe the case was appropriately staffed at all times by Morgan Lewis.

23. Morgan Lewis also incurred out-of-pocket attorney expenses which were necessary and reasonably expended in this case. Throughout the litigation, we made diligent efforts to hold expenses, which must be paid when incurred, to a minimum. Morgan Lewis seeks reimbursement for approximately \$32,821.28 in out-of-pocket expenses to this case.

24. Attached as Exhibit B is a detailed expense report detailing litigation support and travel expenses incurred by Morgan Lewis from August 30, 2017 to June 13, 2019. These expense records were recorded on a current basis, in chronological order, showing the date, category, description, and total cost for each expense sought in this fee petition. I believe that the expense records and the summaries of them represent accurate and reliable accounts of the compensable costs and expenses incurred by Morgan Lewis and its personnel in this case.

25. The costs and expenses reflected in Exhibit B were actually expended to prosecute this action and were reasonable and necessary to protect the interests of the Named Plaintiffs and Plaintiff Class. The expenses for which Morgan Lewis seeks reimbursement are in addition to significant categories of out-of-pocket expenses expended by Morgan Lewis to prosecute this action for which it does not seek reimbursement, including: expert fees exceeding \$75,000; all meal expenses; any expenses associated with an attorney's travel for which counsel is not seeking to recover fees; and any expenses that counsel has deemed overhead, such as copying, mailing, research, and equipment costs.

* * *

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 1, 2019



Scott T. Schutte
Morgan Lewis & Bockius
77 W. Wacker
Chicago, IL 60601
312-324-1773

Exhibit A

Timekeeper Name	Total Hours	Total Amount Billed
SCOTT T. SCHUTTE	314.2	\$157,100.00
Attorney - \$500	314.2	\$157,100.00
COURTNEY J. MCCORMICK	51.2	\$16,640.00
Attorney - \$325	51.2	\$16,640.00
STEPHANIE SCHUSTER	87.2	\$28,340.00
Attorney - \$325	87.2	\$28,340.00
NING HE	175.9	\$48,372.50
Attorney - \$275	175.9	\$48,372.50
Grand Total	628.5	\$250,452.50

Timekeeper Name	Position	Rate	Date	Description	Hours	Amount
SCOTT T. SCHUTTE	Attorney	\$500.00	6/27/2017	Review materials provided by co-counsel; telephone conference with co-counsel re potential new matter.	2.2	\$1,100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/14/2017	Review and analyze current draft of complaint.	0.8	\$400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/18/2017	Call with team re next steps.	0.5	\$250.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/1/2017	Prepare for and attend call re scheduling order.	1.3	\$650.00
NING HE	Attorney	\$275.00	8/13/2017	Review and analyze background documents.	0.2	\$55.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/14/2017	Review materials provided by client; prepare for and attend call with client re mediator.	0.9	\$450.00
NING HE	Attorney	\$275.00	8/14/2017	Review and analyze background documents.	0.2	\$55.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/17/2017	Prepare for and attend call with team re status and strategy.	1.2	\$600.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	8/22/2017	Review Defendants' Motion to Dismiss.	1.5	\$487.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/23/2017	Correspond with team re status and strategy.	0.5	\$250.00
NING HE	Attorney	\$275.00	8/23/2017	Participate in status call.	1.0	\$275.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/24/2017	Correspond with team re strategy issues.	0.4	\$200.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/30/2017	Review and respond to e-mails re discovery.	0.4	\$200.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	9/6/2017	Participate in conference call regarding strategy related to pending motions, discovery and draft protective order.	0.7	\$227.50
NING HE	Attorney	\$275.00	9/6/2017	Attend weekly status call.	1.0	\$275.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/15/2017	Weekly telephone conference with team.	1.0	\$500.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	9/15/2017	Attend strategic conference call regarding mediation preparation.	0.6	\$195.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/18/2017	Attend videoconference re background facts.	2.3	\$1,150.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	9/18/2017	Attend case presentation and training.	2.0	\$650.00
NING HE	Attorney	\$275.00	9/18/2017	Participate in training program re background and status update.	2.5	\$687.50
SCOTT T. SCHUTTE	Attorney	\$500.00	9/19/2017	Work on preparing for mediation and getting PHV motion filed.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/20/2017	Attend weekly team call; attend call with mediator re mediation logistics.	1.5	\$750.00
NING HE	Attorney	\$275.00	9/20/2017	Participate in weekly status call.	1.0	\$275.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/25/2017	Prepare for (0.5) and attend call re mediation (0.7).	1.2	\$600.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/28/2017	Attend meet-and-confer re discovery issues.	0.8	\$400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/1/2017	Review background documents to prepare for mediation.	2.2	\$1,100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/2/2017	Meet with team and review background materials to prepare for mediation.	5.8	\$2,900.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/2/2017	Attend mediation	5.5	\$2,750.00
NING HE	Attorney	\$275.00	10/2/2017	Review relevant case documents.	0.2	\$55.00
NING HE	Attorney	\$275.00	10/3/2017	Review and analyze documents related to the case.	0.5	\$137.50
SCOTT T. SCHUTTE	Attorney	\$500.00	10/4/2017	Attend weekly telephone conference with co-counsel.	1.1	\$550.00
NING HE	Attorney	\$275.00	10/4/2017	Participate in weekly status conference call.	1.1	\$302.50
SCOTT T. SCHUTTE	Attorney	\$500.00	10/17/2017	Work on letter re spoliation issue.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/18/2017	Work on letter re discovery/spoliation issue.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/23/2017	Review draft of motion to dismiss surrepley; telephone conference with team re same.	1.1	\$550.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/25/2017	Telephone conference with team re status and strategy.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/27/2017	Prepare for and attend meet-and-confer re discovery issues; follow-up call with team.	1.5	\$750.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/31/2017	Correspond with team re status and next steps.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/1/2017	Work on compromise plan for document destruction issue.	0.8	\$400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/6/2017	Telephone conference with team re status and strategy; correspondence with team re ongoing discovery issues.	1.0	\$500.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/7/2017	Correspond with team re expert issues.	0.2	\$100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/13/2017	Prepare for and attend call with team re expert issues.	1.5	\$750.00
NING HE	Attorney	\$275.00	11/15/2017	Participate in weekly status call.	1.0	\$275.00
NING HE	Attorney	\$275.00	11/16/2017	Summarize takeaways from the weekly status call.	0.2	\$55.00
NING HE	Attorney	\$275.00	11/29/2017	Review, prepare, and participate in weekly status call.	2.5	\$687.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	12/6/2017	Participate in conference regarding status discovery strategy and updates.	0.6	\$195.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/12/2017	Telephone conference with team re class cert strategy.	0.5	\$250.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/13/2017	Attend call re next steps.	0.8	\$400.00
NING HE	Attorney	\$275.00	12/13/2017	Participate and summarize weekly status call.	1.0	\$275.00
NING HE	Attorney	\$275.00	12/15/2017	Participate and summarize oral argument and debrief.	2.0	\$550.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/19/2017	Work on Rule 30(b)(6) notice.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/20/2017	Work on 30(b)(6) topics.	1.2	\$600.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/21/2017	Review and edit scheduling motion.	0.3	\$150.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	1/3/2018	Participate in conference regarding status of case and next steps.	0.5	\$162.50
NING HE	Attorney	\$275.00	1/8/2018	Review and analyze emails re status update.	0.3	\$82.50

Timekeeper Name	Position	Rate	Date	Description	Hours	Amount
COURTNEY J. MCCORMICK	Attorney	\$325.00	1/12/2018	Participate in conference regarding status of case and next steps.	0.5	\$162.50
NING HE	Attorney	\$275.00	1/17/2018	Prepare and participate in weekly status call.	1.1	\$302.50
SCOTT T. SCHUTTE	Attorney	\$500.00	1/31/2018	Prepare for and attend strategy call.	1.4	\$700.00
SCOTT T. SCHUTTE	Attorney	\$500.00	2/1/2018	Work on deposition preparation.	0.6	\$300.00
NING HE	Attorney	\$275.00	2/7/2018	Prepare and participate in weekly status call.	2.2	\$605.00
NING HE	Attorney	\$275.00	2/12/2018	Review and analyze emails re status update.	0.2	\$55.00
SCOTT T. SCHUTTE	Attorney	\$500.00	2/14/2018	Prepare for and attend weekly call with team.	1.3	\$650.00
NING HE	Attorney	\$275.00	2/21/2018	Participate partially in weekly status conference.	0.9	\$247.50
SCOTT T. SCHUTTE	Attorney	\$500.00	2/25/2018	Work on preparing for 30(b)(6) depositions.	1.8	\$900.00
SCOTT T. SCHUTTE	Attorney	\$500.00	2/28/2018	Work on preparing for 30(b)(6) depositions.	0.2	\$100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/1/2018	Prepare for and attend team call; work on preparing for depositions.	2.4	\$1,200.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/4/2018	Prepare for 30(b)(6) deposition.	5.3	\$2,650.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/5/2018	Work on preparing for corporate representative depositions.	6.1	\$3,050.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	3/5/2018	Prepare for deposition of Christy Collins.	0.7	\$227.50
SCOTT T. SCHUTTE	Attorney	\$500.00	3/6/2018	Prepare for and take corporate representative deposition of Christy Collins.	11.3	\$5,650.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/7/2018	Prepare for and take corporate representative deposition; work on follow-up issues.	9.3	\$4,650.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/11/2018	Follow-up on corporate rep depositions.	0.4	\$200.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/14/2018	Prepare for (1.5) and attend weekly call with team; work on class cert papers (1.9).	3.4	\$1,700.00
NING HE	Attorney	\$275.00	3/14/2018	Participate in weekly status conference; review and analyze draft brief.	1.8	\$495.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/15/2018	Review and edit class cert brief; work on declaration in support of class counsel appointment.	4.3	\$2,150.00
NING HE	Attorney	\$275.00	3/16/2018	Review and analyze research re privilege.	0.7	\$192.50
SCOTT T. SCHUTTE	Attorney	\$500.00	3/21/2018	Prepare for and attend calls re strategy and expert issues.	2.4	\$1,200.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	3/21/2018	Participate in conference call regarding deposition and discovery issue updates.	1.0	\$325.00
NING HE	Attorney	\$275.00	3/21/2018	Arrange and review notes from status call.	0.2	\$55.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/28/2018	Attend weekly strategy call.	1.2	\$600.00
NING HE	Attorney	\$275.00	3/28/2018	Prepare (1.0) and participate in weekly status conference call (1.1).	2.1	\$577.50
NING HE	Attorney	\$275.00	3/30/2018	Review and analyze defendant's motions.	0.4	\$110.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/4/2018	Prepare for and attend strategy call.	1.3	\$650.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/11/2018	Attend weekly status call.	1.2	\$600.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	4/11/2018	Participate in conference call regarding deposition and discovery issue updates.	1.0	\$325.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/14/2018	Review and analyze class rep cert opposition.	0.4	\$200.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	4/20/2018	Participate in conference call regarding discovery issues.	1.0	\$325.00
NING HE	Attorney	\$275.00	5/7/2018	Review and analyze documents re updates and case status.	1.3	\$357.50
SCOTT T. SCHUTTE	Attorney	\$500.00	5/18/2018	Attend weekly strategy call.	1.0	\$500.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/24/2018	Telephone conference with team re settlement issues	0.5	\$250.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/24/2018	Work on deposition preparation.	2.4	\$1,200.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/25/2018	Prepare for and attend weekly strategy call; work on deposition preparations.	1.0	\$500.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	5/25/2018	Participate in conference call regarding case status updates	0.5	\$162.50
SCOTT T. SCHUTTE	Attorney	\$500.00	5/29/2018	Telephone conference with team re status and strategy	1.0	\$500.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/31/2018	Telephone conferences with team re settlement meeting and court hearing.	1.3	\$650.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/8/2018	Prepare for and attend weekly status call.	1.2	\$600.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	6/8/2018	Participate in conference call regarding case status updates	1.0	\$325.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/15/2018	Attend weekly status call.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/18/2018	Prepare for and attend call with mediator.	1.4	\$700.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/21/2018	Attention to file; review and respond to e-mail	0.7	\$350.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/25/2018	Telephone conference with team re next steps.	0.6	\$300.00
NING HE	Attorney	\$275.00	6/26/2018	Participate in conference call re next steps and document review	0.8	\$220.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/27/2018	Telephone conference with team re next steps on class cert.	0.7	\$350.00
NING HE	Attorney	\$275.00	6/27/2018	Participate in group call re oral argument.	0.7	\$192.50
SCOTT T. SCHUTTE	Attorney	\$500.00	7/3/2018	Follow-up on class cert argument; participate in weekly team call; work on discovery issues.	2.2	\$1,100.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/3/2018	Participate in conference call regarding case status updates	0.5	\$162.50

Timekeeper Name	Position	Rate	Date	Description	Hours	Amount
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/6/2018	Analyze Dr. Calloway deposition transcript; draft analysis re the same.	3.6	\$1,170.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/9/2018	Prepare for and attend call with mediator.	1.5	\$750.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/10/2018	Prepare for and attend strategy call; review and respond to e-mail.	1.3	\$650.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/10/2018	Participate in conference call regarding case status updates	0.7	\$227.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/10/2018	Review documents responsive to Plaintiff's RFPs for key information	2.5	\$812.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/10/2018	Analyze Dr. Calloway deposition transcript; draft analysis re the same	1.7	\$552.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/13/2018	Review documents responsive to Plaintiff's RFPs for key information	1.7	\$552.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/14/2018	Review documents responsive to Plaintiff's RFPs for key information	2.3	\$747.50
SCOTT T. SCHUTTE	Attorney	\$500.00	7/16/2018	Prepare for and attend call with opposing counsel re discovery issues; telephone conference with team re expert issues.	2.6	\$1,300.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/16/2018	Review documents responsive to Plaintiff's RFPs for key information	4.7	\$1,527.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/16/2018	Analyze Dr. Calloway deposition transcript; draft analysis re the same	2.7	\$877.50
SCOTT T. SCHUTTE	Attorney	\$500.00	7/17/2018	Prepare for and attend weekly call.	1.1	\$550.00
NING HE	Attorney	\$275.00	7/17/2018	Participate in status call re email review and draft summary email.	1.6	\$440.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/19/2018	Telephone conference with team re next steps; work on discovery issues.	3.0	\$1,500.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/20/2018	Work on discovery issues.	1.3	\$650.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/20/2018	Finalize analysis of Dr. Calloway's deposition transcript	2.5	\$812.50
SCOTT T. SCHUTTE	Attorney	\$500.00	7/23/2018	Prepare for and attend call with survey expert.	1.8	\$900.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/23/2018	Review documents responsive to Plaintiff's RFPs for key information	3.3	\$1,072.50
SCOTT T. SCHUTTE	Attorney	\$500.00	7/24/2018	Prepare for and attend weekly status call; telephone conference with survey expert K. Johnson.	2.8	\$1,400.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/24/2018	Review documents responsive to Plaintiff's RFPs for key information	3.5	\$1,137.50
SCOTT T. SCHUTTE	Attorney	\$500.00	7/25/2018	Prepare for and attend meet-and-confer with opposing counsel; work on discovery issues.	2.1	\$1,050.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/27/2018	Telephone conference with team re status and strategy; review and analyze draft settlement agreement.	2.1	\$1,050.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/27/2018	Review documents responsive to Plaintiff's RFPs for key information	2.7	\$877.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/28/2018	Review documents responsive to Plaintiff's RFPs for key information	2.0	\$650.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/30/2018	Telephone conferences with team and mediator re settlement	2.1	\$1,050.00
SCOTT T. SCHUTTE	Attorney	\$500.00	7/31/2018	Call with team re status and strategy; review draft settlement documents.	1.3	\$650.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/31/2018	Participate in conference call re discovery, expert preparation, case strategy, and mediation preparation.	0.5	\$162.50
COURTNEY J. MCCORMICK	Attorney	\$325.00	7/31/2018	Review documents responsive to Plaintiff's RFPs for key information	1.0	\$325.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/3/2018	Review Rule 23(f) petition; telephone conference with team re Rule 23(f) response and mediation proposal.	2.1	\$1,050.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	8/3/2018	Review documents responsive to Plaintiff's RFPs for key information	1.5	\$487.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/5/2018	Work on Rule 23(f) opposition.	2.8	\$1,400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/6/2018	Work on Rule 23(f) opposition.	3.1	\$1,550.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/7/2018	Prepare for and attend weekly strategy call.	1.3	\$650.00
NING HE	Attorney	\$275.00	8/7/2018	Review documents for production.	4.7	\$1,292.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/8/2018	Work on Rule 23(f) opposition.	1.9	\$950.00
NING HE	Attorney	\$275.00	8/8/2018	Review and analyze documents re deposition preparation.	3.0	\$825.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/9/2018	Work on Rule 23(f) opposition.	2.2	\$1,100.00
NING HE	Attorney	\$275.00	8/9/2018	Review and analyze documents for potential production.	1.4	\$385.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/10/2018	Work on Rule 23(f) opposition.	2.8	\$1,400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/12/2018	Work on Rule 23(f) opposition.	3.2	\$1,600.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/13/2018	Work on Rule 23(f) opposition.	7.1	\$3,550.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	8/13/2018	Analyze and review response to plaintiffs Rule 23(f) motion.	1.2	\$390.00
NING HE	Attorney	\$275.00	8/13/2018	Review and analyze documents in preparation for deposition of P. Carter.	4.2	\$1,155.00

Timekeeper Name	Position	Rate	Date	Description	Hours	Amount
SCOTT T. SCHUTTE	Attorney	\$500.00	8/14/2018	Attend weekly status call.	1.5	\$750.00
NING HE	Attorney	\$275.00	8/14/2018	Review and analyze documents in preparation of deposition.	3.3	\$907.50
NING HE	Attorney	\$275.00	8/15/2018	Review and analyze documents in preparation of deposition of P. Carter.	4.2	\$1,155.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/16/2018	Work on preparing for Carter deposition.	2.1	\$1,050.00
NING HE	Attorney	\$275.00	8/16/2018	Review and analyze documents in preparation of deposition of P. Carter.	3.2	\$880.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/17/2018	Telephone conference with K. Johnson re survey; review and analyze survey document and draft proposal; telephone conference with opposing counsel re draft settlement agreements.	2.6	\$1,300.00
NING HE	Attorney	\$275.00	8/17/2018	Review and analyze documents re preparation of deposition of P. Carter.	6.0	\$1,650.00
NING HE	Attorney	\$275.00	8/19/2018	Review and analyze documents in preparation of deposition of P. Carter.	3.1	\$852.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/20/2018	Work on preparing for Carter deposition.	1.1	\$550.00
NING HE	Attorney	\$275.00	8/20/2018	Prepare for deposition of P. Carter.	4.5	\$1,237.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/21/2018	Review and edit mediation statement.	0.8	\$400.00
NING HE	Attorney	\$275.00	8/21/2018	Prepare for deposition of P. Carter.	7.6	\$2,090.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/22/2018	Work on preparing for Carter deposition.	2.9	\$1,450.00
NING HE	Attorney	\$275.00	8/22/2018	Review and analyze documents in preparation for deposition of P. Carter.	5.3	\$1,457.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/23/2018	Attend Young-Walker deposition; work on preparing for Carter deposition.	11.8	\$5,900.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/24/2018	Prepare for and take Carter deposition; follow-up on settlement issues.	9.7	\$4,850.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/25/2018	Follow-up from Carter deposition.	0.5	\$250.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/27/2018	Prepare for mediation.	0.7	\$350.00
NING HE	Attorney	\$275.00	8/27/2018	Review and analyze documents re depositions; coordinate re deposition documents	3.2	\$880.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/28/2018	Attend weekly strategy call; work on preparing for mediation.	3.1	\$1,550.00
NING HE	Attorney	\$275.00	8/28/2018	Review and analyze documents post interlocutory appeal and in preparation for mediation.	1.7	\$467.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/29/2018	Meet with team to prepare for mediation; telephone conference re survey.	4.3	\$2,150.00
NING HE	Attorney	\$275.00	8/29/2018	Review and analyze documents re mediation and interlocutory appeal.	1.5	\$412.50
SCOTT T. SCHUTTE	Attorney	\$500.00	8/30/2018	Prepare for and attend mediation.	12.4	\$6,200.00
SCOTT T. SCHUTTE	Attorney	\$500.00	8/31/2018	Work on appeal issues; follow-up on mediation.	0.7	\$350.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/4/2018	Prepare for and attend weekly strategy meeting; work on appellate issues; follow-up on mediation.	2.2	\$1,100.00
NING HE	Attorney	\$275.00	9/4/2018	Participate in weekly status call.	1.3	\$357.50
SCOTT T. SCHUTTE	Attorney	\$500.00	9/5/2018	Telephone conference re settlement.	0.8	\$400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/6/2018	Work on revised settlement proposal.	0.8	\$400.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/7/2018	Work on mediation proposal; telephone conference with team re same.	1.9	\$950.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/10/2018	Follow-up on settlement issues.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/11/2018	Prepare for and attend weekly status call; prepare for and attend call with mediator.	4.1	\$2,050.00
COURTNEY J. MCCORMICK	Attorney	\$325.00	9/11/2018	Participate in mediation strategy call.	1.0	\$325.00
NING HE	Attorney	\$275.00	9/11/2018	Review and analyze emails and documents.	0.5	\$137.50
SCOTT T. SCHUTTE	Attorney	\$500.00	9/12/2018	Attend team strategy call.	1.5	\$750.00
NING HE	Attorney	\$275.00	9/14/2018	Review and analyze emails and documents for potential production.	1.8	\$495.00
NING HE	Attorney	\$275.00	9/17/2018	Review emails re status and revised drafts.	0.9	\$247.50
SCOTT T. SCHUTTE	Attorney	\$500.00	9/18/2018	Prepare for and attend weekly strategy call.	1.3	\$650.00
NING HE	Attorney	\$275.00	9/18/2018	Participate in status call re updates.	1.2	\$330.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/20/2018	Review and respond to e-mail on discovery issues.	0.2	\$100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/21/2018	Prepare for and attend mediation call.	1.5	\$750.00
SCOTT T. SCHUTTE	Attorney	\$500.00	9/24/2018	Work on appellate issues; telephone conference with team re strategy.	1.5	\$750.00
NING HE	Attorney	\$275.00	9/25/2018	Review and analyze emails re status update and revised drafts.	0.5	\$137.50
NING HE	Attorney	\$275.00	9/27/2018	Review and analyze emails and listen to Postawko hearing.	2.4	\$660.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/2/2018	Prepare for and attend strategy call.	1.2	\$600.00
NING HE	Attorney	\$275.00	10/2/2018	Participate in group status call.	1.2	\$330.00
NING HE	Attorney	\$275.00	10/4/2018	Review and analyze documents and emails for production.	1.0	\$275.00
NING HE	Attorney	\$275.00	10/17/2018	Review and analyze email re case update.	0.2	\$55.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/23/2018	Attention to discovery issues.	0.3	\$150.00
NING HE	Attorney	\$275.00	10/23/2018	Prepare for deposition of J. Lester	0.6	\$165.00

Timekeeper Name	Position	Rate	Date	Description	Hours	Amount
SCOTT T. SCHUTTE	Attorney	\$500.00	10/24/2018	Telephone conference with team re Lester and Decker depositions.	1.2	\$600.00
NING HE	Attorney	\$275.00	10/24/2018	Prepare for deposition of J. Lester.	0.9	\$247.50
NING HE	Attorney	\$275.00	10/25/2018	Review and analyze documents re preparation for deposition of J. Lester; participate in oral argument re motion for stay.	3.3	\$907.50
NING HE	Attorney	\$275.00	10/26/2018	Review and analyze documents re preparation of deposition of J. Lester.	6.4	\$1,760.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/28/2018	Work on preparing for Lester deposition.	0.5	\$250.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/29/2018	Review appellate appendix; work on preparing for Lester deposition.	5.2	\$2,600.00
NING HE	Attorney	\$275.00	10/29/2018	Prepare for deposition of J. Lester.	6.7	\$1,842.50
SCOTT T. SCHUTTE	Attorney	\$500.00	10/30/2018	Prepare for and take deposition of Julie Lester.	8.9	\$4,450.00
NING HE	Attorney	\$275.00	10/30/2018	Prepare and appear for deposition of J. Lester.	10.0	\$2,750.00
SCOTT T. SCHUTTE	Attorney	\$500.00	10/31/2018	Follow-up on Decker and Lester depositions.	2.1	\$1,050.00
NING HE	Attorney	\$275.00	11/6/2018	Prepare and participate in weekly status call.	1.5	\$412.50
SCOTT T. SCHUTTE	Attorney	\$500.00	11/7/2018	Work on appellate issues.	0.6	\$300.00
NING HE	Attorney	\$275.00	11/7/2018	Review and analyze emails re status.	0.3	\$82.50
SCOTT T. SCHUTTE	Attorney	\$500.00	11/8/2018	Work on appeal.	1.5	\$750.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/12/2018	Work on appellate brief.	0.7	\$350.00
STEPHANIE SCHUSTER	Attorney	\$325.00	11/12/2018	Call with S. Schutte regarding Rule 23(f) appeal.	0.8	\$260.00
NING HE	Attorney	\$275.00	11/12/2018	Confer with S. Schutte and S. Schuster re appellate brief and collect records on file.	1.6	\$440.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/13/2018	Attend telephone conference with team re strategy; work on appeal issues.	1.5	\$750.00
NING HE	Attorney	\$275.00	11/13/2018	Participate in weekly status call and confer with S. Schutte and S. Schuster re appellate brief.	2.2	\$605.00
NING HE	Attorney	\$275.00	11/14/2018	Draft motion re extension of time to file response appellate brief.	1.8	\$495.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/16/2018	Prepare for and attend telephone conference with team re mediation strategy.	0.7	\$350.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/20/2018	Attend weekly call; work on appeal issues.	1.2	\$600.00
NING HE	Attorney	\$275.00	11/20/2018	Revise and finalize motion for extension.	3.2	\$880.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/26/2018	Participate in settlement conference.	2.9	\$1,450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	11/27/2018	Attend weekly strategy call.	0.7	\$350.00
NING HE	Attorney	\$275.00	11/27/2018	Participate in weekly status call; prepare certificate re motion to extend.	2.9	\$797.50
NING HE	Attorney	\$275.00	11/28/2018	Prepare and finalize motion for extension.	1.3	\$357.50
SCOTT T. SCHUTTE	Attorney	\$500.00	12/4/2018	Correspond with team re next steps.	0.3	\$150.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/4/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	1.3	\$422.50
NING HE	Attorney	\$275.00	12/4/2018	Review 8th circuit cases re class cert and review summary from the call.	1.5	\$412.50
STEPHANIE SCHUSTER	Attorney	\$325.00	12/5/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	3.5	\$1,137.50
SCOTT T. SCHUTTE	Attorney	\$500.00	12/6/2018	Work on appellate brief.	0.8	\$400.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/6/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	0.3	\$97.50
NING HE	Attorney	\$275.00	12/6/2018	Review 8th circuit decision re class cert brief	0.2	\$55.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/7/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	1.4	\$455.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/10/2018	Work on appellate brief.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/11/2018	Telephone conference with team re appellate brief; work on appellate brief.	2.2	\$1,100.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/11/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	4.8	\$1,560.00
NING HE	Attorney	\$275.00	12/11/2018	Participate in weekly status call and prepare for appellate briefing.	1.1	\$302.50
STEPHANIE SCHUSTER	Attorney	\$325.00	12/12/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	2.4	\$780.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/13/2018	Work on appellate brief.	2.3	\$1,150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/14/2018	Work on appellate brief.	1.8	\$900.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/15/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	3.1	\$1,007.50
STEPHANIE SCHUSTER	Attorney	\$325.00	12/16/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	13.2	\$4,290.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/17/2018	Work on appellate brief.	1.8	\$900.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/17/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	2.6	\$845.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/18/2018	Work on appellate brief.	3.4	\$1,700.00
NING HE	Attorney	\$275.00	12/18/2018	Prepare and participate in weekly status conference call.	1.1	\$302.50
SCOTT T. SCHUTTE	Attorney	\$500.00	12/19/2018	Work on appellate brief.	1.9	\$950.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/19/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	2.2	\$715.00

Timekeeper Name	Position	Rate	Date	Description	Hours	Amount
NING HE	Attorney	\$275.00	12/19/2018	Gather appendices and revise citations to appendices accordingly.	3.3	\$907.50
SCOTT T. SCHUTTE	Attorney	\$500.00	12/20/2018	Review and revise appellate brief.	1.1	\$550.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/20/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	3.7	\$1,202.50
NING HE	Attorney	\$275.00	12/20/2018	Edit citation for appellate brief.	0.4	\$110.00
SCOTT T. SCHUTTE	Attorney	\$500.00	12/21/2018	Edit and finalize appellate brief.	1.5	\$750.00
STEPHANIE SCHUSTER	Attorney	\$325.00	12/21/2018	Draft answering brief for defendants' interlocutory appeal of class certification.	4.8	\$1,560.00
SCOTT T. SCHUTTE	Attorney	\$500.00	1/7/2019	Attend telephone conference with team re settlement issues.	1.0	\$500.00
NING HE	Attorney	\$275.00	1/7/2019	Review and analyze documents and filings and related news report up to date.	1.6	\$440.00
NING HE	Attorney	\$275.00	1/8/2019	Participate in weekly status call and review documents to date.	2.0	\$550.00
SCOTT T. SCHUTTE	Attorney	\$500.00	1/9/2019	Review and respond to e-mail re strategy issues.	0.2	\$100.00
NING HE	Attorney	\$275.00	1/9/2019	Review and analyze recent documents re case status and upcoming depositions and mediation.	2.3	\$632.50
SCOTT T. SCHUTTE	Attorney	\$500.00	1/12/2019	Correspond with team re expert issues.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	1/14/2019	Review and finalize expert reports.	2.1	\$1,050.00
SCOTT T. SCHUTTE	Attorney	\$500.00	1/16/2019	Follow up on mediation issues.	0.2	\$100.00
NING HE	Attorney	\$275.00	1/22/2019	Prepare and participate in status call; review and analyze documents re mediation.	1.3	\$357.50
NING HE	Attorney	\$275.00	1/23/2019	Review and analyze documents in preparation for mediation.	0.5	\$137.50
NING HE	Attorney	\$275.00	1/24/2019	Review documents in preparation for mediation.	3.5	\$962.50
NING HE	Attorney	\$275.00	1/25/2019	Prepare for(2.0) and attend mediation (7.0).	9.0	\$2,475.00
SCOTT T. SCHUTTE	Attorney	\$500.00	1/28/2019	Correspond with team re status and strategy.	0.2	\$100.00
NING HE	Attorney	\$275.00	1/28/2019	Review and analyze documents following mediation and status updates.	2.7	\$742.50
STEPHANIE SCHUSTER	Attorney	\$325.00	2/8/2019	Analyze plaintiffs' reply brief on appeal.	1.8	\$585.00
NING HE	Attorney	\$275.00	2/11/2019	Review and analyze documents and emails re case status.	1.2	\$330.00
NING HE	Attorney	\$275.00	3/8/2019	Review and analyze emails re case status.	1.2	\$330.00
NING HE	Attorney	\$275.00	3/15/2019	Review and analyze emails re mediation updates.	1.0	\$275.00
SCOTT T. SCHUTTE	Attorney	\$500.00	3/21/2019	Work on settlement issues.	0.5	\$250.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/3/2019	Attend weekly strategy call.	1.0	\$500.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/10/2019	Prepare for and attend weekly call; work on preparing for appellate argument.	2.1	\$1,050.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/11/2019	Work on preparing for appellate argument.	1.3	\$650.00
STEPHANIE SCHUSTER	Attorney	\$325.00	4/13/2019	Prepare for oral argument.	3.9	\$1,267.50
STEPHANIE SCHUSTER	Attorney	\$325.00	4/14/2019	Prepare for oral argument.	4.9	\$1,592.50
SCOTT T. SCHUTTE	Attorney	\$500.00	4/15/2019	Work on preparing for appellate argument.	3.2	\$1,600.00
STEPHANIE SCHUSTER	Attorney	\$325.00	4/15/2019	Prepare for oral argument.	5.5	\$1,787.50
SCOTT T. SCHUTTE	Attorney	\$500.00	4/16/2019	Prepare for and attend moot court for Eighth Circuit argument.	3.5	\$1,750.00
STEPHANIE SCHUSTER	Attorney	\$325.00	4/16/2019	Prepare for oral argument; participate in moot for same.	11.9	\$3,867.50
SCOTT T. SCHUTTE	Attorney	\$500.00	4/17/2019	Prepare for Eighth Circuit argument.	5.5	\$2,750.00
STEPHANIE SCHUSTER	Attorney	\$325.00	4/17/2019	Prepare for oral argument.	7.7	\$2,502.50
SCOTT T. SCHUTTE	Attorney	\$500.00	4/18/2019	Prepare for and attend 8th Circuit argument.	6.0	\$3,000.00
STEPHANIE SCHUSTER	Attorney	\$325.00	4/18/2019	Prepare for and present oral argument.	7.4	\$2,405.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/19/2019	Follow-up on settlement issues.	1.4	\$700.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/23/2019	Attend weekly strategy call.	1.2	\$600.00
SCOTT T. SCHUTTE	Attorney	\$500.00	4/30/2019	Prepare for and attend weekly strategy call.	1.5	\$750.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/2/2019	Telephone conference with team re settlement issues.	0.7	\$350.00
NING HE	Attorney	\$275.00	5/7/2019	Review and analyze email exchange re case update.	0.5	\$137.50
SCOTT T. SCHUTTE	Attorney	\$500.00	5/11/2019	Review and respond to e-mail re settlement.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/14/2019	Attend settlement strategy call.	0.9	\$450.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/15/2019	Correspond with team re settlement issues.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/21/2019	Attend team call re settlement.	0.7	\$350.00
SCOTT T. SCHUTTE	Attorney	\$500.00	5/31/2019	Correspond with team re settlement.	0.2	\$100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/2/2019	Correspond re settlement time frames.	0.3	\$150.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/3/2019	Review and respond to settlement correspondence.	0.2	\$100.00
SCOTT T. SCHUTTE	Attorney	\$500.00	6/4/2019	Attend strategy call re settlement.	0.5	\$250.00
NING HE	Attorney	\$275.00	6/5/2019	Review and analyze case status.	0.4	\$110.00
NING HE	Attorney	\$275.00	6/11/2019	Review and analyze emails re case update and settlement status.	1.4	\$385.00
NING HE	Attorney	\$275.00	6/12/2019	Review and analyze emails re status update and settlement process.	0.4	\$110.00
TOTAL:					628.5	\$250,452.50

Exhibit B

Expense Category	Date	Name	Vendor (If Applicable)	Cost Amount	Description
Air	3/5/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	716.31	Air prepare for and attend 30(b)(6) depositions Chicago/St. Louis 3/5-3/7/18 for S. Schutte
Air	8/24/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	265.98	Air prepare for and attend Young-Walker and Carter depositions
Air	8/28/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	583.96	Air prepare for and attend mediation - airfare - Chicago/Kansas City - 8/28-8/30/18 for S.
Air	10/26/2018	HE, NING	Ning He	341.10	Attend deposition. Oct 26, 2018 - Ning He
Air	10/26/2018	HE, NING	Ning He	341.10	Attend deposition. airfare Oct 26, 2018 - Ning He
Air	10/29/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	341.10	Air prepare for and attend Lester deposition to Columbia on 10/29/18 for S. Schutte
Air	10/31/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	265.98	Air prepare for and attend Lester deposition St. Louis to Chicago on 10/31/18 for S. Schutte
Air	1/14/2019	HE, NING	Ning He	468.60	Air Attend mediation in Kansas City. Merchant: United Airlines
Air	4/15/2019	SCHUSTER, STEPHANIE		836.16	Air LVQQWL : 526 2464999129 : 2019-04-17 - 2019- 2019-04-17 : SCHUSTER/STEPHANIE --> DCA STL DCA : Billable
Car Rental	3/7/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	223.40	Car Rental prepare for and attend 30(b)(6) depositions Jefferson City - 3/5-3/7/18 for S. Schutte
Car Rental	8/24/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	283.94	Car Rental prepare for and attend Young-Walker and Carter depositions
Car Rental	10/31/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	496.92	prepare for and attend Lester deposition St. Louis - 10/30-10/31/18 for S. Schutte Oct 31, 2018 - Scott T. Schutte
Court Reporter	2/15/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	631.20	Court Reporter - Alaris Litigation Services - deposition transcript of Kris Dadant (taken on 2/17/18) -
Court Reporter	2/28/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,149.53	Court Reporter - Alaris Litigation Services - deposition transcript of Kealey Williams (taken 2/13/18) -
Court Reporter	2/28/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,169.50	Court Reporter - Alaris Litigation Services - deposition transcript of Ericka Eggemeyer (taken on
Court Reporter	3/12/2018	SCHUTTE, SCOTT T.	Capital City Court Reporting	1,008.15	Court Reporter - Capital City Court Reporting - deposition of Christy Collins (volume I) - 12982
Court Reporter	3/13/2018	SCHUTTE, SCOTT T.	Capital City Court Reporting	2,333.65	Court Reporter - Capital City Court Reporting - Deposition transcript of Christy Collins (Volume II) (taken
Court Reporter	3/15/2018	SCHUTTE, SCOTT T.	Capital City Court Reporting	1,533.90	Court Reporter - Capital City Court Reporting - Deposition transcript of Laine Young-Walker (taken on
Court Reporter	4/9/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,143.40	Court Reporter - Alaris Litigation Services - deposition of Stephen Calloway (taken on 3/20/18) - 63166
Court Reporter	5/9/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,163.20	Court Reporter - Alaris Litigation Services - deposition of Susan Savage (taken on 4/20/18) - 65985
Court Reporter	7/26/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,425.70	Court Reporter - Alaris Litigation Services - deposition of Christy Collins (taken on 4/19/18) - 65477
Court Reporter	8/31/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,676.05	Court Reporter - Alaris Litigation Services - deposition of Laine Young Walker (taken on 8/23/18) - 75652
Court Reporter	8/31/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,099.55	Court Reporter - Alaris Litigation Services - deposition of Patsy Carter, M.D. (taken on 8/24/18) - 75654
Court Reporter	10/29/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,270.90	Court Reporter - Alaris Litigation Services - deposition of Lori Masek (taken on 10/10/18) - 80786
Court Reporter	10/31/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	948.30	Court Reporter - Alaris Litigation Services - deposition of Christy Collins (taken on 10/11/18) - 80900
Court Reporter	11/6/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,201.15	Court Reporter - Alaris Litigation Services - deposition of Ginger Nicol (taken on 10/20/18) - 81578
Court Reporter	11/8/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,157.15	Court Reporter - Alaris Litigation Services - deposition of Julie Lester (taken on 10/30/18) - 81687
Court Reporter	11/15/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	2,298.70	Court Reporter - Alaris Litigation Services - deposition of Tim Decker (taken on 10/31/18) - 81996
Court Reporter	12/19/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,132.25	Court Reporter - Alaris Litigation Services - deposition of Ivy Doxley (taken on 11/29/18) - 85025
Court Reporter	12/21/2018	SCHUTTE, SCOTT T.	Alaris Litigation Services	1,438.15	Court Reporter - Alaris Litigation Services - deposition of Joseph John Parks III MD (taken on 12/5/18) -
Hotel	8/24/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	142.23	Hotel prepare for and attend Young-Walker and Carter depositions
Hotel	8/30/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	680.09	Hotel prepare for and attend mediation - hotel - Kansas City - 8/28-8/30/18 for S. Schutte
Hotel	10/30/2018	SCHUTTE, SCOTT T.	Ning He	150.29	prepare for and attend Lester deposition Jefferson City - 10/29-10/30/18 for S. Schutte Oct 30, 2018 - Scott T. Schutte
Hotel	10/31/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	367.59	prepare for and attend Lester deposition St. Louis - 10/30-10/31/18 for S. Schutte Oct 31, 2018 - Scott T. Schutte
Hotel	1/24/2019	HE, NING	Ning He	234.78	Hotel Attend mediation in Kansas City. hotel
Mediator/Mediation Fees	10/30/2017	SCHUTTE, SCOTT T.	James Howard Levin	2,275.00	Mediator/Mediation Fees - James Howard Levin - services for mediation on 10/2/17 - 110117 2275.00
Miscellaneous Out of Town Travel	3/7/2018	SCHUTTE, SCOTT T.	Scott T. Schutte	26.32	Miscellaneous Out of Town Travel prepare for and attend 30(b)(6) depositions gasoline for rental car on 3/7/18 for S. Schutte
				32,821.28	