

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

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

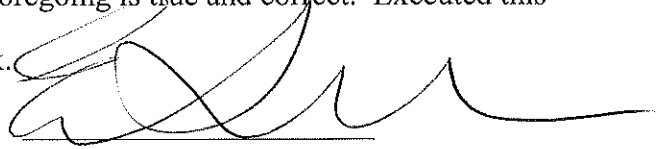
SUPPLEMENTAL DECLARATION OF STERLING ANALYTICS

I, Erin L. Sussman, Esq., do hereby declare as follows:

1. Exhibit 1 attached to the Declaration of Sterling Analytics contained a typographical error in the hourly rate for Leecia Welch, as set out in Table 2. Doc. 285-1 at 7. That table incorrectly listed Ms. Welch’s hourly rate as \$450 per hour. Her correct hourly rate is \$475 per hour, as reflected in the declaration of Leecia Welch and the time sheets attached to her declaration, Doc. No. 285-3 at 11, 41-136. A corrected version of Exhibit 1 is attached to this Supplemental Declaration.

2. That error in Ms. Welch’s rate was limited to the cell listing her rate in Table 2. Ms. Welch’s correct rate was used to calculate the remainder of the information in the Declaration of Sterling Analytics, including the total fees for Ms. Welch and for the National Center for Youth Law, and for fees submitted to Sterling Analytics for review and removed during that review.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of October, 2019 in New York, New York.



Erin L. Sussman

**CORRECTED EXHIBIT 1 TO THE DECLARATION OF STERLING
ANALYTICS**

Table 1

Firm	Total Hours Claimed
Children's Rights	7,763.6
Saint Louis University Legal Clinic	185.9
National Center for Youth Law	2,839.6
Morgan, Lewis & Bockius	628.5
Total Hours	11,417.6

Table 2

Name	Law School Grad. Year	Total Hours	Hourly Rate	Total Fees
<i>Children's Rights</i>				
Samantha Bartosz	1986	1426.4	\$500	\$690,092.50
Elizabeth Gretter	2009	2384.8	\$375	\$863,220.35
Stephen Dixon	1987	378.1	\$375	\$126,769.38
Aaron Finch	2012	268.5	\$325	\$83,420.25
Catherine Frizell	2012	538.9	\$325	\$157,965.17
Jonathan King	2012	425.9	\$325	\$132,074.58
Daniele Gerard	1990	338.4	\$300	\$94,530.00
Danielle Rosenthal	2013	817.9	\$300	\$242,792.50
Erin McGuinness	2012	148.7	\$225	\$33,465.00
Genevieve Caffrey	Paralegal	345.8	\$150	\$51,865.50
Hailey Cherepon	Paralegal	236.9	\$150	\$35,542.00
Meghan Kacsmar	Paralegal	453.3	\$150	\$67,988.00
<i>St. Louis University Legal Clinic</i>				
John Ammann	1984	185.9	\$400	\$74,360.00
<i>National Center for Youth Law</i>				
Bill Grimm	1975	500.6	\$500	\$228,900.00
Leecia Welch	1996	638.3	\$475	\$285,118.75
Poonam Juneja	2009	658.0	\$375	\$239,343.75
Freya Pitts	2013	302.8	\$300	\$84,795.00
Amanda Grill	2017	472.7	\$225	\$105,300.00
Jacqueline Stolzenberg	2018	92.0	\$225	\$20,700.00
Kira Setren	Paralegal	175.2	\$150	\$26,280.00

<i>Morgan, Lewis & Bockius</i>				
Scott T. Schutte	1995	314.2	\$500	\$157,100.00
Courtney J. McCormick	2010	51.2	\$325	\$16,640.00
Stephanie Schuster	2011	87.2	\$325	\$28,340.00
Ning He	2015	175.9	\$275	\$48,372.50
Total		11,417.6		\$3,894,975.22

Table 3

Firm	Total Expenses Claimed
Children's Rights	\$83,269.19
Saint Louis University Legal Clinic	\$0.00
National Center for Youth Law	\$16,817.09
Morgan, Lewis & Bockius	\$32,821.28
Total Expenses	\$132,907.56