

SUMMARY OF MENDOZA PLAINTIFFS' FEE REQUEST FOR TIME AND EXPENSES

July 1, 2017 – September 30, 2017

TIME

7/1/2017 – 9/30/2017: 101.4 hours (Thompson)

Total: 101.4 hours

Proskauer Rate: \$350/hr

Total Proskauer Fees Requested: \$35,490.00

7/1/2017 – 9/30/2017: 108.60 hours (Rodriguez)

7/1/2017 – 9/30/2017: 1.0 hours (Saenz)

Total: 109.6 hours

MALDEF Rate: \$300/hr

Total MALDEF Fees Requested: \$32,880.00

GRAND TOTAL: \$68,370.00

Fisher v. TUSD
Mendoza Plaintiffs' Attorney Hours (Proskauer)
7/1/2017-9/30/2017

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
7/5/2017	LOIS D. THOMPSON	0.80	t/c S Campoy and J Rodriguez re: call with S Brown re Roberts-Naylor and budget; S Campoy mtgs re USP
7/6/2017	LOIS D. THOMPSON	0.20	emails J Rodriguez re SM issues re SMAR
7/6/2017	LOIS D. THOMPSON	2.00	draft objections to SMAR -- failures to find non compliance with USP (student assignment)
7/7/2017	LOIS D. THOMPSON	1.50	draft objections to SMAR
7/8/2017	LOIS D. THOMPSON	2.50	draft objections to SMAR (ALEs/quality of ed.)
7/10/2017	LOIS D. THOMPSON	3.30	cont'd drafting objections to SMAR (quality of ed./ALEs/dual language)
7/11/2017	LOIS D. THOMPSON	2.00	cont'd drafting objections to SMAR (student support services, AASSD, MASSD, etc.)
7/12/2017	LOIS D. THOMPSON	3.00	cont'd drafting objections to SMAR, review/edit portions of JR drafts
7/13/2017	LOIS D. THOMPSON	2.00	cont'd drafting objections to SMAR and review/edit JR sections
7/15/2017	LOIS D. THOMPSON	3.00	review District final 910 (G) budget and related docs in ct. filing and MP continuing objections, esp re magnet plans
7/16/2017	LOIS D. THOMPSON	2.00	draft objections to TUSD budget -- magnet plans
7/17/2017	LOIS D. THOMPSON	0.70	read Fisher objections to SMAR and to budget
7/17/2017	LOIS D. THOMPSON	2.50	final edits/revisions to objections to SMAR and review of related exhibits for filing
7/17/2017	LOIS D. THOMPSON	3.00	cont'd drafting objections to 910(G) budget esp re magnet and transition plans; review family engagement issues re same
7/17/2017	LOIS D. THOMPSON	0.80	t/c S Brown and J Rodriguez re TUSD budget issues: teacher/mentor ratio, magnet funding, facilities budgeting

Fisher v. TUSD
Mendoza Plaintiffs' Attorney Hours (Proskauer)
7/1/2017-9/30/2017

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
7/18/2017	LOIS D. THOMPSON	4.00	cont'd drafting objections to TUSD 910(G) budget
7/19/2017	LOIS D. THOMPSON	2.00	edit/review J Rodriguez sections on objections to 910(G) budget; final revisions, edits and review of proposed filing; review appendix and
7/24/2017	LOIS D. THOMPSON	0.40	read, reply to J Rodriguez email re conversation with S Brown re Roberts-Naylor; emails S Campoy re same
7/31/2017	LOIS D. THOMPSON	0.50	read, notes re follow up re SM supplemental annual report
7/31/2017	LOIS D. THOMPSON	0.20	rev. R Salter RFI re consultants
7/31/2017	LOIS D. THOMPSON	1.50	review/check certain factual assertions in TUSD response to SMAR
8/1/2017	LOIS D. THOMPSON	1.40	cont'd review data in TUSD response to SMAR and notes re needed response
8/2/2017	LOIS D. THOMPSON	3.00	draft MP response to TUSD response re SMAR re integration progress
8/3/2017	LOIS D. THOMPSON	2.40	cont'd drafting of response to TUSD response re integration; read/edit/ notes re J Rodriguez draft re discipline response
8/5/2017	LOIS D. THOMPSON	1.70	read SM Supp SMAR and ALE R&R; outline issues and prelim response
8/6/2017	LOIS D. THOMPSON	1.00	finalize draft response to Supp. SMAR and filing of ALE R&R; email to J Rodriguez re same
8/7/2017	LOIS D. THOMPSON	0.70	final review, edits MP responses to TUSD SMAR response and SM supp filings; emails J Rodriguez re same
8/7/2017	LOIS D. THOMPSON	0.80	review TUSD budget objections response and notes re same and needed follow up
8/11/2017	LOIS D. THOMPSON	0.60	read SM filing in response to objections to SMAR, note issues

Fisher v. TUSD
Mendoza Plaintiffs' Attorney Hours (Proskauer)
7/1/2017-9/30/2017

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
8/14/2017	LOIS D. THOMPSON	0.90	emails and t/c S Campoy, J Rodriguez re SM response to objections to SMAR and District current issues
8/14/2017	LOIS D. THOMPSON	0.70	outline, commence draft of MP objections and response to SM response to objections to SMAR
8/16/2017	LOIS D. THOMPSON	0.90	t/c J Rodriguez and SM re open compliance and data issues and emails, call J Rodriguez re same
8/16/2017	LOIS D. THOMPSON	0.40	emails with S Campoy and J Rodriguez re CRP and Itinerant teacher issues
8/17/2017	LOIS D. THOMPSON	0.20	email SM re open data and compliance issues
8/17/2017	LOIS D. THOMPSON	1.30	review TUSD response to RFI re enrollment in Wheeler GATE and review TUSD filings re same; draft email to M Taylor for clarification
8/17/2017	LOIS D. THOMPSON	2.00	review data relating to SM ALE R&R
8/18/2017	LOIS D. THOMPSON	1.30	outline response to SM ALE R&R
8/22/2017	LOIS D. THOMPSON	2.40	cont'd review of ALE materials and data; draft objections to ALE R&R
8/24/2017	LOIS D. THOMPSON	3.50	on-going analysis ALE enrollment and completion data and ALE plans; con't drafting of objections
8/24/2017	LOIS D. THOMPSON	0.40	emails J Rodriguez re SM issues re SMAR 2015-16 report and open compliance items
8/25/2017	LOIS D. THOMPSON	0.60	review email and memo from SM re on-going 2015-16 compliance issues and SMAR; email J Rodriguez re same
8/26/2017	LOIS D. THOMPSON	2.40	review of ALE Action Plan and Supp re prep of Addendum 1 to objections re plan provisions not implemented for recruitment/expansion, and drafting addendum
9/5/2017	LOIS D. THOMPSON	0.50	overview review of TUSD annual report filing
9/6/2017	LOIS D. THOMPSON	0.60	read, emails (J Rodriguez) re: WDH proposal re achievement gap and magnet school assessment

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7/1/2017-9/30/2017

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
9/6/2017	LOIS D. THOMPSON	0.40	review status WDH recommendations re open SMAR issues and email WDH re same
9/8/2017	LOIS D. THOMPSON	1.00	t/c J Rodriguez, S Campoy re misc TUSD issues: magnet plans, budget R&R, MAS decision, SM proposal re magnet school achievement assessment, etc.
9/11/2017	LOIS D. THOMPSON	1.30	draft response to SM proposal re abandoning narrowing achievement gap as criterion for assessing USP implementation
9/13/2017	LOIS D. THOMPSON	2.00	read, notes re DAR 2016-17
9/18/2017	LOIS D. THOMPSON	0.80	read, emails (J Rodriguez, S Campoy) re: SM revised formulation re achievement gap issues
9/20/2017	LOIS D. THOMPSON	3.50	review DAR and related magnet plan issues; notes re RFIs and open items
9/20/2017	LOIS D. THOMPSON	1.20	read, notes re District objection to SM budget R&R; notes re needed response
9/21/2017	LOIS D. THOMPSON	1.20	read District response on 2015-16 non compliance issues and review prior correspondence and docs re same
9/22/2017	LOIS D. THOMPSON	0.90	t/c J Rodriguez re open issues: 2015-16 non compliance and SMAR; budget response by District, SM proposals re achievement gap
9/22/2017	LOIS D. THOMPSON	0.40	t/c J Rodriguez and WDH re open 2015-16 non compliance issues
9/22/2017	LOIS D. THOMPSON	2.40	con't review DAR and notes re needed info, open issues
9/23/2017	LOIS D. THOMPSON	2.00	cont'd review 2016-17 DAR
9/24/2017	LOIS D. THOMPSON	3.50	cont'd review 2016-17 DAR and begin to formalize RFIs
9/25/2017	LOIS D. THOMPSON	0.80	t/c Hawley and Rodriguez re open issues -- SMAR report on non compliance, budget, approach to academic achievement gaps

Fisher v. TUSD
Mendoza Plaintiffs' Attorney Hours (Proskauer)
7/1/2017-9/30/2017

<u>Date</u>	<u>Name</u>	<u>Hours</u>	<u>Description</u>
9/25/2017	LOIS D. THOMPSON	3.50	con't reading of 2016-17 DAR and drafting of RFIs re same
9/26/2017	LOIS D. THOMPSON	0.70	prep for and t/c with DOJ re open discipline issues esp re TUSD reply to open SMAR issues re compliance
9/26/2017	LOIS D. THOMPSON	2.40	review of TUSD response/objections to SM R&R re budget and magnet plans and draft response
9/27/2017	LOIS D. THOMPSON	3.00	con't reading of DAR and drafting of RFIs directed to 2016-17 DAR; review, edit RFIs drafted by J Rodriguez and emails re same
9/27/2017	LOIS D. THOMPSON	1.40	read, edit, sections of budget reply to TUSD response/objections from J Rodriguez; emails re same
9/28/2017	LOIS D. THOMPSON	0.40	emails J Rodriguez re DAR RFIs
9/29/2017	LOIS D. THOMPSON	1.00	t/c S Campoy, J Rodriguez re misc issues -- magnet, Reynolds property, etc.
	TOTAL	101.4	

Time Sheet - Juan Rodriguez

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
7/5/2017	Call with L. Thompson and S. Campoy re USP-related meetings, USP budget, magnet schools and other open items	0.80
7/6/2017	Review and analyze Special Master Annual Report ("SMAR") sections re Mendoza Plaintiffs' requests for noncompliance relating to discipline, and parties' correspondence and documents re same; Draft outline of opposition to SMAR sections re same	3.60
7/6/2017	Review and analyze L. Thompson email re opposition to SMAR; Draft email to L. Thompson re same	0.40
7/7/2017	Draft objections to SMAR re discipline issues	2.10
7/10/2017	Cont. draft objections to SMAR re discipline issues	2.00
7/12/2017	Draft objections to SMAR re administrative and certificated staff issues; Revise and edit L. Thompson portions of SMAR objections; Draft email to L. Thompson re same	2.60
7/13/2017	Draft SMAR objections re administrative and certificated staff issues (professional development)	2.20
7/13/2017	Review and analyze Special Master summary of parties' unitary status discussion, and L. Thompson email re same; Draft email to L. Thompson re same	0.20
7/14/2017	Draft SMAR objections re administrative and certificated staff; Revise and edit SMAR objections; Draft email to L. Thompson re same	4.70
7/15/2017	Review and analyze family and community engagement plan and related documents; Draft SMAR objections re family engagement	4.00
7/16/2017	Draft SMAR objections re family and community engagement and facilities	3.20
7/17/2017	Draft SMAR objections re facilities; Revise and edit objections to SMAR; Finalize objections to SMAR and gather exhibits; Draft emails to L. Thompson re same	5.30
7/17/2017	Prepare for and call with S. Brown and L. Thompson re budget issues	1.00

Time Sheet - Juan Rodriguez

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
7/18/2017	Review and analyze Fisher Plaintiffs' and TUSD's objections/responses to SMAR, and docs related to District assertions re discipline	1.00
7/18/2017	Review and analyze Fisher Plaintiffs' objections to USP Budget	0.20
7/18/2017	Review and analyze Davis parking lot DIA and L. Thompson email re same; Draft email to S. Brown re same	0.30
7/18/2017	Draft memo to T. Saenz re SMAR, SMAR objections, and related items; Confer with T. Saenz re same	1.50
7/18/2017	Review and analyze L. Thompson and S. Campoy emails re budget issues; Draft budget objections re facilities, CRC itinerant teachers and teacher mentors	3.70
7/19/2017	Revise and edit L. Thompson portions of USP budget objections; Finalize USP budget objections and gather exhibits; Correspondence with L. Thompson re same	3.40
7/21/2017	Call with R. Salter re SMAR issues	0.30
7/24/2017	Call with S. Brown re Roberts-Naylor DIA and integration issues; Draft email to L. Thompson re same; Review and analyze L. Thompson email re same	1.50
7/25/2017	Draft memo to T. Saenz re unitary status and TUSD budget issues; Confer with T. Saenz re same	1.60
7/28/2017	Review and analyze materials relating to discipline issues raised in TUSD objection to SMAR	4.10
7/31/2017	Draft Mendoza Plaintiffs' response to TUSD objection to SMAR	1.50
8/1/2017	Draft Mendoza Plaintiffs' response to TUSD objection to SMAR	2.20
8/2/2017	Draft Mendoza Plaintiffs' response to TUSD objection to SMAR; Revise and edit same	4.20
8/5/2017	Revise and edit Mendoza Plaintiffs' response to TUSD response to SMAR	2.00
8/7/2017	Revise and edit Mendoza Plaintiffs' response to TUSD response to SMAR	2.20

Time Sheet - Juan Rodriguez

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
8/7/2017	Draft motion to exceed page limit and proposed order re Mendoza Plaintiffs' response to TUSD response to SMAR	0.60
8/7/2017	Revise and edit L. Thompson draft of Mendoza Plaintiffs' response to Special Master SMAR supplement and ALE R&R	0.50
8/14/2017	Review and analyze Special Master response to SMAR objections, L. Thompson and S. Campoy emails re same, portions of Mendoza Plaintiffs' objections to SMAR; Draft email to L. Thompson and S. Campoy re same	0.80
8/14/2017	Call with L. Thompson and S. Campoy re Special Master SMAR response, TUSD administration and other open issues	0.70
8/15/2017	Draft memo to T. Saenz re TUSD objections to SMAR, related SMAR issues and other open items	0.60
8/16/2017	Call with Special Master re Court order re SMAR recommendation	0.60
8/16/2017	Call with L. Thompson re SMAR Order and Special Master call re same	0.20
8/16/2017	Review SMAR objections relating to data issues, appendices re same; Draft email to Dr. Hawley re same	0.40
8/16/2017	Review and analyze TUSD RFI responses re GATE/Wheeler and AZMerit data	0.30
8/24/2017	Call with Special Master re Objections to 2015-16 SMAR	0.30
8/24/2017	Draft emails to L. Thompson re 2015-16 SMAR objection issues, and to Special Master re same	0.30
8/29/2017	Review and analyze Special Master email re transition coordinators, correspondence re same; Draft email to Special Master re same	0.20
8/29/2017	Draft memo to T. Saenz re objections to SMAR and ALE R&R, and magnet and transition school plan issues	0.60
8/31/2017	Review and analyze Special Master memo re magnet school academic criteria/achievement gap issues	0.20

Time Sheet - Juan Rodriguez

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
9/7/2017	Review and analyze L. Thompson email re achievement gap issues; Draft email to L. Thompson re same	0.20
9/8/2017	Call with L. Thompson and S. Campoy re magnet achievement gap issues, budget R&R, CRCs and other open items	1.00
9/12/2017	Draft memo to T. Saenz re TUSD Annual Report, unitary status issues and other open items; Confer with T. Saenz re same	1.20
9/12/2017	Review and analyze S. Campoy email re Pueblo issues and Governing Board meeting	0.20
9/13/2017	Review and analyze TUSD Annual Report and appendices: family and community engagement, and related case material	0.50
9/15/2017	Review and analyze TUSD Annual Report and appendices: family and community engagement, and related case materials; Draft RFIs re same	1.40
9/15/2017	Read portion of budget R&R relating to mentors, and related documents and correspondence, and L. Thompson and S. Campoy emails re same; Draft email to L. Thompson and S. Campoy re same	1.00
9/20/2017	Review and analyze Special Master memo re: Narrowing the Achievement Gap; Draft emails with L. Thompson re same and re call with Dr. Hawley re TUSD budget responses	0.30
9/20/2017	Review and analyze TUSD Annual Report and appendices: family and community engagement and facilities and technology; Draft RFIs re same	2.60
9/21/2017	Review and analyze District response to Special Master memo re: SMAR recommendations concerning TUSD noncompliance issues, and related documents	1.60
9/21/2017	Review and analyze TUSD response and limited objection to Special Master R&R re budget for 2017-18	0.60
9/22/2017	Draft email to DOJ re discipline/DAEP issues	0.20

Time Sheet - Juan Rodriguez

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
9/22/2017	Call with L. Thompson re Budget R&R, SMAR issues, District unitary status analysis schedule, and achievement gap issues	0.90
9/22/2017	Call with Special Master and L. Thompson re SMAR issues	0.40
9/22/2017	Draft email to Special Master re discipline/DAEP issues	0.30
9/25/2017	Review and analyze TUSD Annual Report: discipline; Draft RFIs re same	3.20
9/25/2017	Call with L. Thompson and Special Master re noncompliance issues and other open items	0.80
9/26/2017	Review and analyze TUSD Annual Report: discipline; Draft RFIs re same	3.50
9/26/2017	Prepare for and call with L. Thompson and DOJ re exclusionary discipline and DAEP issues	0.80
9/26/2017	Review and analyze TUSD Annual Report: administrative and certificated staff; Draft RFIs re same	3.60
9/27/2017	Review and analyze TUSD response to Special Master's budget recommendations and related documents; Draft response to TUSD objections to budget R&R	3.90
9/27/2017	Review and analyze L. Thompson and Special Master emails re unitary status process; Draft email to T. Saenz re same	0.50
9/27/2017	Review and analyze TUSD Annual Report: Extracurricular activities, CRCs, multicultural curriculum and dual language; Draft RFIs re same; Draft emails to L. Thompson re same	4.20
9/28/2017	Review and analyze TUSD Annual Report: administrative and certificated staff; Draft RFIs re same	4.40
9/28/2017	Revise and edit L. Thompson and J. Rodriguez portions of Mendoza Plaintiffs' response to TUSD objections to Special Master's budget R&R	1.50
9/28/2017	Revise and edit TUSD Annual Report RFIs; Draft emails to and review emails from L. Thompson re same	0.70



Time Sheet - Juan Rodriguez

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
9/29/2017	Call with L. Thompson and S. Campoy re magnet, usp-related meetings, Reynolds sale, and other open items	1.00
	TOTAL	108.60



Time Sheet - Thomas A. Saenz

Mendoza v. TUSD

DATE	DESCRIPTION	TIME
7/18/2017	Confer with J. Rodriguez re Special Master's Annual Report, objections to the report and related issues	0.30
7/25/2017	Confer with J. Rodriguez re unitary status and TUSD 2017-18 desegregation budget issues	0.40
9/12/2017	Confer with J. Rodriguez re TUSD Annual Report and unitary status issues	0.30
	TOTAL	1.00