

SOMACH SIMMONS & DUNN  
A Professional Corporation

1 SOMACH SIMMONS & DUNN  
A Professional Corporation  
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EXEMPT FROM FILING FEES  
PURSUANT TO GOVERNMENT  
CODE SECTION 6103

6 Attorneys for Petitioner/Plaintiff BYRON-  
7 BETHANY IRRIGATION DISTRICT

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9  
10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 IN AND FOR THE COUNTY OF SANTA CLARA

12 Coordination Proceeding  
Special Title (Rule 3.550)

Case No. 1-15-CV-285182

13 CALIFORNIA WATER  
14 CURTAILMENT CASES

JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 4838

15 BYRON-BETHANY IRRIGATION DISTRICT,

DECLARATION OF THERESA C.  
BARFIELD IN SUPPORT OF BYRON-  
BETHANY IRRIGATION DISTRICT'S  
MOTION FOR ATTORNEYS' FEES  
PURSUANT TO CODE OF CIVIL  
PROCEDURE § 1021.5

16 Petitioner/Plaintiff,

17 vs.

18 CALIFORNIA STATE WATER RESOURCES  
CONTROL BOARD; THOMAS HOWARD as  
19 EXECUTIVE DIRECTOR OF THE STATE  
WATER RESOURCES CONTROL BOARD;  
20 MICHAEL GEORGE, as DELTA  
WATERMASTER; and DOES 1 THROUGH  
21 100, INCLUSIVE,

Date: October 18, 2019  
Time: 9:00 a.m.  
Dept: 1  
Judge: Hon. Brian C. Walsh

22 Respondents/Defendants.

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1 I, THERESA C. BARFIELD, declare as follows:

2 1. I am an attorney at law licensed to practice before the courts of the State of  
3 California. I am a shareholder with Somach Simmons & Dunn, and counsel of record for  
4 Petitioner/Plaintiff Byron-Bethany Irrigation District (BBID). The following matters are within  
5 my personal knowledge and, if called as a witness, I can competently testify thereto.

6 2. From June 1, 2015 through June 30, 2019, BBID incurred \$2,165,872.23 in  
7 attorneys' fees for professional services directly related to the State Water Resources Control  
8 Board's curtailments and litigation arising therefrom, including the Superior Court (Curtailment  
9 Notice Cases, Phases I – III, and Dismissal Order Cases), and the administrative proceedings  
10 (Enforcement Action). The Somach Simmons & Dunn (SSD) invoices generated from June 1,  
11 2015 through June 30, 2019 reflect this total of \$2,165,872.23 for all work performed. These  
12 invoices also reflect a certain amount of work that was "written-off" by SSD. Thus, some of the  
13 invoices include time entries that reflect additional work performed, but not charged to BBID.  
14 BBID paid all amounts charged to it as reflected in the invoices for work performed in support of  
15 this matter.

16 3. BBID does not seek recovery of attorneys' fees in relation to the Dismissal Order  
17 Cases, and Phases II and III of the Curtailment Notice Cases.

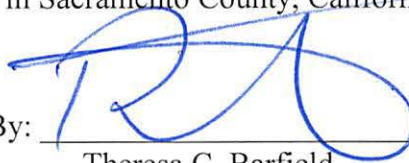
18 4. I have personal knowledge of the attorney fee billing practices at SSD, and  
19 personal knowledge of the attorney tasks performed in support of this matter. As such, and in an  
20 effort to calculate the fees associated with work performed in support of the Dismissal Order  
21 Cases, and Phases II and III of the Curtailment Notice Cases, I personally reviewed each SSD  
22 invoice from June 1, 2015 through June 30, 2019. During the review, I identified work performed  
23 in support of the Dismissal Order Cases, and Phases II and III of the Curtailment Notice Cases,  
24 and deducted the attorney time and associated fees for this work. Based upon my diligent and  
25 good faith effort to identify the total fees paid by BBID for work performed by SSD related to the  
26 Dismissal Order Cases, and Phases II and III of the Curtailment Notice Cases, I attribute  
27 \$207,921.50 to this work. Accordingly, the total amount of attorneys' fees that BBID seeks to  
28 recover in this motion as of the date of this Declaration is \$1,957,950.73. BBID will receive .

1 additional invoices for work subsequently performed, including work on this motion and motions  
2 related to recovery of litigation costs.

3 5. Attached hereto as Exhibit A is a true and correct copy of a detailed summary of  
4 attorneys' fees sought herein, identifying the nature of attorney tasks with the associated  
5 hours/fees from June 1, 2015 through June 30, 2019. I prepared this summary. The summary  
6 does *not* include the attorney tasks and associated hours/fees that constitute the \$207,921.50 of  
7 work related to the Dismissal Order Cases, and Phases II and III of the Curtailment Notice Cases.

8 I declare under penalty of perjury under the laws of the State of California that the  
9 foregoing is true and correct.

10 Executed this 5th day of August 2019, in Sacramento County, California.

11  
12 By:   
13 Theresa C. Barfield

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# EXHIBIT A

**EXHIBIT A**  
**Declaration of Theresa C. Barfield in Support of Byron-Bethany Irrigation District's Motion for Attorneys' Fees**  
**Pursuant to Code of Civil Procedure Section 1021.5**

<u>Date Range</u>	<u>General Overview of Tasks</u>	<u>Attorney Hours</u>	<u>Paralegal Hours</u>	<u>Total Fees</u>
June 2015 - August 2015	Research State Water Resources Control Board (Water Board) jurisdiction and authority to curtail; tasks responsive to Water Board curtailments, including legal research, communications, water acquisition and transfer efforts, meeting attendance, preparation of petition for reconsideration and legal research in support; research, drafting and filing of Writ/Complaint action and amended Writ/Complaint; research, drafting and filing of Temporary Restraining Order (TRO)/Preliminary Injunction documents and attend hearings; review Writ/Complaint actions filed on behalf of other petitioners; draft enforcement actions against Byron Bethany Irrigation District (BBID) and West Side Irrigation District (WSID); work with experts regarding water availability analysis, modeling, and expert litigation support work; research, draft and respond to correspondence to and from the Water Board and Department of Water Resources' (DWR) regarding the Public Records Act (PRA) Requests; review Water Board spreadsheet model; work related to Water Board's motion to change venue and petition for coordination; review and analyze Water Board expert declarations; prepare for and attend Case Management Conference and Court orders; communications with counsel; review and analyze Water Board notices regarding pre-hearing mandates; research and draft motion to stay; draft notice of intent to appear and related documents.	<b>JUNE 2015:</b> 2.70 hrs @ \$390 0.90 hrs @ \$310 0.70 hrs @ \$300 139.50 hrs @ \$260 220.50 hrs @ \$205 <b>JULY 2015:</b> 1.20 hrs @ \$390 1.80 hrs @ \$300 79.50 hrs @ \$260 26.10 hrs @ \$205 <b>AUGUST 2015:</b> 6.70 hrs @ \$390 33.00 hrs @ \$300 140.00 hrs @ \$260 134.70 hrs @ \$205 [\$1,882.24 not billed to client]	<b>JUNE 2015:</b> 1.60 hrs @ \$180 17.40 hrs @ \$165 1.60 hrs @ \$150 <b>JULY 2015:</b> 11.0 hrs @ \$165 2.60 hrs @ \$150 <b>AUGUST 2015:</b> 7.00 hrs @ \$180 15.00 hrs @ \$165 [\$669.00 not billed to client]	\$ 193,357.26
September 2015	Draft notice of intent to appear and related documents; draft request for the extension of time, request for discovery, preparation and attendance at the pre-hearing conference for enforcement action; review Water Board hearing rules, protocol and procedures; work with experts regarding water availability analysis, modeling, and expert litigation support work; draft BBID's first amended Writ/Complaint and legal research in support; research, draft and file motion to stay enforcement action and supporting documents, including review and analysis of opposing briefs/exhibits, and preparation of reply brief and supporting documents; review and analysis of amended Petitions/Writs filed by other parties; prepare for and attend oral argument/hearing on motion to stay; review, analyze and draft responses to Water Board notices regarding pre-hearing mandates and prosecution team correspondence; review and analysis of court order on motion to stay; research and draft writ of prohibition.	<b>SEPTEMBER 2015:</b> 76.90 hrs @ \$300 152.40 hrs @ \$260 30.60 hrs @ \$215 165.70 hrs @ \$205 [\$7,800.50 not billed to client]	<b>SEPTEMBER 2015:</b> 9.50 hrs @ \$180 36.90 hrs @ \$165 15.30 hrs @ \$150 [\$3,336 not billed to client]	\$ 102,198.50
October - November 2015	Review and analysis of documents produced by Water Board in response to PRA requests; work with experts regarding water availability analysis, modeling, and expert litigation support work; prepare deposition notices and meet and confer regarding deposition notices, scope and schedules; preparation of exhibits for depositions; review subpoena duces tecum served on BBID by the Water Board; prepare for and attend witness depositions, including exhibit preparation; research draft and finalize Petition for Writ of Mandate; review, analyze and draft responses to Water Board notices regarding pre-hearing mandates and prosecution team correspondence; research, draft and finalize opposition to prosecution team's motion for a protective order; research and draft motions to quash and motions for protective orders in response to subpoenas, including review of oppositions and preparation of reply briefs and supporting documents.	<b>OCTOBER 2015:</b> 1.80 hrs @ \$390 114.60 hrs @ \$260 29.60 hrs @ \$225 16.40 hrs @ \$205 <b>NOVEMBER 2015:</b> 44.60 hrs @ \$300 149.90 hrs @ \$260 39.10 hrs @ \$225 87.00 hrs @ \$205 [\$3,824.00 not billed to client]	<b>OCTOBER 2015:</b> 4.00 hrs @ \$180 24.60 hrs @ \$165 8.30 hrs @ \$150 <b>NOVEMBER 2015:</b> 12.80 hrs @ \$180 3.00 hrs @ \$150 23.50 hrs @ \$100	\$ 137,160.50

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<u>Date Range</u>	<u>General Overview of Tasks</u>	<u>Attorney Hours</u>	<u>Paralegal Hours</u>	<u>Total Fees</u>
December 2015	Prepare for and take depositions of Water Board and DWR witnesses; research and draft pre-hearing briefing; work with experts regarding water availability analysis, modeling, and expert litigation support work, including preparation of draft testimony; draft joint case management conference (CMC) statement, prepare for and attend CMC; prepare correspondence for hearing officers; research, draft and finalize motion to strike; review and analysis of documents produced by the Water Board and DWR	<b>DECEMBER 2015:</b> 61.50 hrs @ \$300 63.40 hrs @ \$260 109.00 hrs @ \$225 94.70 hrs @ \$205 [\$7,487.10 not billed to client]	<b>DECEMBER 2015:</b> 9.40 hrs @ \$180 3.90 hrs @ \$165 [\$252.00 not billed to client]	\$ 73,468.90
January - February 2016	Research and draft pre-hearing briefing; preparation of exhibits and written witness testimony, including expert testimony; preparation of written witten witness rebuttal testimony, including expert testimony; work with experts regarding water availability analysis, modeling, and expert litigation support work, including preparation of draft testimony and witness preparation for hearing before the Water Board; review and analysis of Water Board witness testimony, including expert testimony; preparation of objections and motions in limine; review and analysis of Water Board's oppositions to pre-hearing briefing; preparation of opening trial statements; review and analysis of motions for leave to intervene and proposed complaints in intervention; review and analysis of deposition transcripts; review and analyze pre-hearing notices, orders and correspondence from the Water Board hearing officers; review and analysis of Water Board pre-hearing briefing and objections; review and analysis of pre-hearing briefing by other petitioners and objections; review and analysis of Water Board's demurrer and State Water Contractors' (SWC) motion to intervene; research in support of opposing demurrer and motion to intervene; review and analysis of Water Board's rulings on objections; attend pre-hearing conference.	<b>JANUARY 2016:</b> 1.0 hrs @ \$410 102.40 hrs @ \$320 20.80 hrs @ \$295 151.70 hrs @ \$285 64.00 hrs @ \$240 105.80 hrs @ \$235 118.90 hrs @ \$225 3.50 hrs @ \$210 <b>FEBRUARY 2016:</b> 69.50 hrs @ \$320 109.60 hrs @ \$295 91.30 hrs @ \$285 46.50 hrs @ \$245 50.60 hrs @ \$240 29.90 hrs @ \$235 4.60 hrs @ \$210 [\$6,393.50 not billed to client]	<b>JANUARY 2016:</b> 36.60 hrs @ \$180 44.20 hrs @ \$165 <b>FEBRUARY 2016:</b> 12.60 hrs @ \$180 24.50 hrs @ \$165 [\$108.00 not billed to client]	\$ 275,974.50

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<u>Date Range</u>	<u>General Overview of Tasks</u>	<u>Attorney Hours</u>	<u>Paralegal Hours</u>	<u>Total Fees</u>
March - May 2016	Preparation for trial/hearing before the Water Board; work with witnesses and experts to prepare testimony; prepare cross-examinations for the Water Board and DWR's witnesses; review and analysis of orders and correspondence from the hearing team; review and analysis of correspondence from the prosecution team; attend trial/hearing before the Water Board; preparation of argument for non-suit; review and analysis of opposition to motion for non-suit; review and analysis of motions for protective orders, motions to strike testimony and motions to quash subpoenas; research, draft and finalize opposition to strike testimony, opposition to motions for protective orders and opposition to motion to quash subpoena; analyze draft and final orders of the Water Board; preparation of memoranda of costs; prepare for and attend case management conference; review Court minute order setting five demurrers; research motion for attorney fees.	<b>MARCH 2016:</b> 96.00 hrs @ \$320 143.90 hrs @ \$295 127.40 hrs @ \$285 87.50 hrs @ \$245 74.10 hrs @ \$240 120.50 hrs @ \$235 <b>APRIL 2016:</b> 4.20 hrs @ \$320 0.50 hrs @ \$295 13.00 hrs @ \$285 1.90 hrs @ \$245 <b>MAY 2016:</b> 46.30 hrs @ \$320 0.20 hrs @ \$295 2.60 hrs @ \$285 10.20 hrs @ \$235 [\$16,669.91 not billed to client]	<b>MARCH 2016:</b> 7.20 hrs @ \$180 71.30 hrs @ \$165 <b>APRIL 2016:</b> 0.30 hrs @ \$180 1.20 hrs @ \$165 <b>MAY 2016:</b> 0.5 hrs @ \$165 [\$652.19 not billed to client]	\$ 196,766.40
June - July 2016	Research cost and fee recovery options; research, draft and finalize motion for attorney fees and supporting documents; review and analysis of Water Board's motion to strike and/or tax BBID's memorandum of costs; analysis of Water Board's dismissal order; review and analysis of prosecution team comment letter on dismissal order; preparation of memoranda of costs; review and analysis of operative petition/complaint in Santa Clara County and evaluate for amendment; review and analysis of pending demurrers and draft opposition; review and analysis of operative petitions/complaints by other petitioners; review and analysis of motions to intervene and draft oppositions; research and draft ex parte application to seek leave to amend petition/complaint in Santa Clara County; meet and confer with Water Board over amendments to Santa Clara Petition/Writ; review and analysis of Water Board's opposition to ex parte application to amend complaint; attend ex parte hearing in Santa Clara County; draft opposition to SWC motion to intervene; draft amended petition/complaint in Santa Clara County and draft motion to amend and supporting documents; review and analysis of Water Board's motion to strike/tax costs; draft joint CMC statement.	<b>JUNE 2016:</b> 48.20 hrs @ \$320 81.80 hrs @ \$295 90.80 hrs @ \$235 <b>JULY 2016:</b> 54.40 hrs @ \$320 96.10 hrs @ \$295 90.80 hrs @ \$235	<b>JUNE 2016:</b> 1.50 hrs @ \$180 30.20 hrs @ \$165 <b>JULY 2016:</b> 16.10 hrs @ \$180 17.70 hrs @ \$165	\$ 139,060.00
August - September 2016	Review, research and analyze Water Board motion to strike/tax costs; continued evaluation and research in support of drafting amended complaint/writ for Santa Clara County; draft amended complaint/writ and stipulation to file the same; evaluation of administrative record issues for the Curtailment Notice cases; meet and confer with Water Board regarding stipulation to file amended complaint/writ; review draft stipulation for DWR's intervention; review and analyze Water Board's demurrers and draft opposition; review opposition and reply briefs for pending demurrers and motions to intervene; draft reply briefs; prepare for and attend hearing on demurrers and motion to intervene; prepare stipulation for compilation of administrative record; draft joint CMC statement	<b>AUGUST 2016:</b> 9.30 hrs @ \$320 15.70 hrs @ \$295 63.10 hrs @ \$235 <b>SEPTEMBER 2016:</b> 31.90 hrs @ \$320 66.90 hrs @ \$295 68.90 hrs @ \$235	<b>AUGUST 2016:</b> 2.50 hrs @ \$180 4.30 hrs @ \$165 <b>SEPTEMBER 2016:</b> 5.20 hrs @ \$180 23.00 hrs @ \$165	\$ 74,461.50

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**Pursuant to Code of Civil Procedure Section 1021.5**

<u>Date Range</u>	<u>General Overview of Tasks</u>	<u>Attorney Hours</u>	<u>Paralegal Hours</u>	<u>Total Fees</u>
October - December 2016	Review and analysis of Court's order on demurrers and motions to intervene; review and analysis of SWC complaint in intervention and amended complaint in intervention; research and draft motion to strike portions of SWC complaint; address administrative record issues; research, draft and finalize the third amended petition/complaint in curtailment notice case; draft government claim to Water Board; draft stipulation to address administrative record and cost/fee motion issues; review and analysis of Water Board's motion to bifurcate hearing on motions for attorney fees and draft opposition; review WSID opposition to motion to bifurcate; review and analysis of amended pleadings by other petitioners; draft stipulation to continue the attorneys' fee and costs motions; draft joint case management statement; meet and confer on Water Board's demurrer to third amended Complaint/Petition, and research issues regarding the same; review and analyze Water Board's motion to strike and demurrer to third amended Petition/Complaint and draft oppositions and supporting documents.	<b>OCTOBER 2016:</b> 25.20 hrs @ \$320 54.30 hrs @ \$295 30.8 hrs @ \$235 <b>NOVEMBER 2016:</b> 12.20 hrs @ \$320 21.80 hrs @ \$295 39.00 hrs @ \$235 <b>DECEMBER 2016:</b> 18.20 hrs @ \$320 51.40 hrs @ \$295 9.30 hrs @ \$235	<b>OCTOBER 2016:</b> 4.60 hrs @ \$180 7.40 hrs @ \$165 <b>NOVEMBER 2016:</b> 0.50 hrs @ \$180 8.90 hrs @ \$165 <b>DECEMBER 2016:</b> 0.30 hrs @ \$180 0.8 hrs @ \$175 11.20 hrs @ \$165	\$ 79,642.50
January - April 2017	Review and analysis of Water Board's consolidated memorandum in opposition to attorneys' fees motion; research and draft reply brief on attorneys' fees motion; review and analysis of motions to strike/tax costs; research and draft oppositions to demurrers and motions to strike; research and draft opposition to cost motions; review and coordination of administrative record; research and draft motion to augment the administrative record; review and analysis of amended pleadings; correspondence exchange regarding administrative record; research, document review and drafting in support of petitioners' opening brief on the merits; review and analysis of the Water Board's consolidated opposition to motion of BBID and WSID to augment the administrative record; research and draft reply brief; draft joint case management statement; preparation and attendance at hearing on April 28, 2017 regarding nine pending motions.	<b>JANUARY 2017:</b> 44.30 hrs @ \$320 77.40 hrs @ \$295 39.60 hrs @ \$235 <b>FEBRUARY 2017:</b> 37.20 hrs @ \$320 4.50 hrs @ \$295 8.20 hrs @ \$235 <b>MARCH - APRIL 2017:</b> 83.40 hrs @ \$320 78.30 hrs @ \$295 31.90 hrs @ \$250 4.30 hrs @ \$235	<b>JANUARY 2017:</b> 39.20 hrs @ \$165 <b>FEBRUARY 2017:</b> 12.40 hrs @ \$165 <b>MARCH - APRIL 2017:</b> 0.90 hrs @ \$175 23.30 hrs @ \$165	\$ 132,761.67
May - June 2017	Review and analysis of Court's order after hearing on April 28, 2017; research and draft fourth amended petition/writ; review and analysis of amended pleadings; review answers to fourth amended petition/writ; research, document review and drafting in support of petitioners' opening brief on the merits; draft stipulation on phase I briefing; review and coordination of administrative record; review and object to Water Board's proposed revisions to the Court's April 2017 order; draft joint case management statement	<b>MAY 2017:</b> 35.20 hrs @ \$320 46.30 hrs @ \$295 2.70 hrs @ \$250 0.20 hrs @ \$125 <b>JUNE 2017:</b> 59.20 hrs @ \$320 35.10 hrs @ \$295 4.10 hrs @ \$250	<b>MAY 2017:</b> 0.90 hrs @ \$165 <b>JUNE 2017:</b> 7.90 hrs @ \$165	\$ 58,734.00
July - September 2017	Review order regarding joint stipulation regarding briefing schedule for phase I; research, document review and drafting in support of petitioners' opening brief on the merits; review and analysis of the Water Board's amended administrative record; attend case management conference	<b>JULY 2017:</b> 84.30 hrs @ \$320 109.5 hrs @ \$295 6.80 hrs @ \$250 6.80 hrs @ \$220 <b>AUGUST - SEPTEMBER 2017:</b> 26.10 hrs @ \$335 10.10 hrs @ \$00 (No Charge)	<b>JULY 2017:</b> 1.20 hrs @ \$175 58.00 hrs @ \$165 <b>AUGUST - SEPTEMBER 2017:</b> 1.70 hrs @ \$180	\$ 81,304.00



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<u>Date Range</u>	<u>General Overview of Tasks</u>	<u>Attorney Hours</u>	<u>Paralegal Hours</u>	<u>Total Fees</u>
October - December 2017	Review and analysis of administrative record documents in support of continued work on briefing phase I on the merits; review and analysis of opposition briefs for phase I; research and draft the consolidated reply brief on the merits for phase I; prepare for hearing on the merits/trial of phase I.	<b>OCTOBER 2017:</b> 83.30 hrs @ \$335 55.00 hrs @ \$310 0.70 hrs @ \$275 0.20 hrs @ \$265 49.40 hrs @ \$235 53.40 hrs @ \$220 <b>NOVEMBER - DECEMBER 2017:</b> 99.90 hrs @ \$335 78.90 hrs @ \$310 6.60 hrs @ \$275 31.30 hrs @ \$235 7.30 hrs @ \$220	<b>OCTOBER 2017:</b> 3.5 hrs @ \$180 <b>NOVEMBER - DECEMBER 2017:</b> 21.10 hrs @ \$180	\$ 141,688.00
January - March 2018	Prepare for oral argument/trial on the merits of phase I; review and research procedural issues raised by the Court in advance of trial; review Water Board's objection to reply brief; research and draft reply to the objection; attend trial on the merits of phase I; review transcript of phase I hearing/trial; review order regarding phase I trial brief; review and analysis of the Court's statement of decision regarding phase I trial; review State Water Contractors objections to the statement of decision regarding phase I; review and analysis of Water Board's notice of intention to move for a new trial or modification of decision and joinders and memorandum in support; research, draft and finalize consolidated opposition motion for a new trial or modification of statement of decision and objections to the statement of decision and review reply briefs; draft joint case management conference statement.	<b>JANUARY 2018:</b> 47.00 hrs @ \$335 62.90 hrs @ \$310 0.70 hrs @ \$275 26.60 hrs @ \$235 17.10 hrs @ \$220 <b>FEBRUARY - MARCH 2018:</b> 1.50 hrs @ 430 78.80 hrs @ \$335 54.00 hrs @ \$310 24.40 hrs @ \$235 4.80 hrs @ \$220	<b>JANUARY 2018:</b> 21.20 hrs @ \$180 <b>FEBRUARY - MARCH 2018:</b> 11.40 hrs @ \$180	\$ 101,698.00
April - September 2018	Review and analyze Court's final statement of decision (post-objections and motion for a new trial/modification); prepare for and attend case management conference; draft and finalize joint case management statements; draft stipulated order from April case management conference; prepare for and attend case management conference.	<b>APRIL - MAY 2018:</b> 40.70 hrs @ \$335 41.70 hrs @ \$310 32.40 hrs @ \$235 <b>JUNE - SEPTEMBER 2018:</b> Excluded - Phases I & III	<b>APRIL - MAY 2018:</b> 7.20 hrs @ 180 <b>JUNE - SEPTEMBER 2018:</b> Excluded - Phases I & III	\$ 35,471.50
October - December 2018	Research in support of cost and fee motions; work related to judgments and writs.	<b>OCTOBER - DECEMBER 2018:</b> 49.10 hrs @ \$350 8.3 hrs @ \$330 16.70 hrs @ \$265	<b>OCTOBER - DECEMBER 2018:</b> 0.50 hrs @ \$00 (No Charge)	\$ 24,349.50

**EXHIBIT A**  
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**Pursuant to Code of Civil Procedure Section 1021.5**

<u>Date Range</u>	<u>General Overview of Tasks</u>	<u>Attorney Hours</u>	<u>Paralegal Hours</u>	<u>Total Fees</u>
January - June 2019	Work related to judgments and writs including preparation, submission to Court, review of formal objections, briefing in support of form of judgments and writs; meet and confer process; submission of final proposed judgments and writs; the Court's issuance of final judgments and writs and objections thereto; draft and finalize joint case management statements; prepare for and attend case management conference; work related to cost and fee recovery issues; draft and finalize the memorandum of costs; review memoranda of costs filed by other petitioners; review and analysis of motions to strike and/or tax costs; initiate research and drafting of motion for attorneys' fees.	<b>JANUARY - MARCH 2019:</b> 31.90 hrs @ \$350 79.10 hrs @ \$330 26.70 hrs @ \$265 <b>APRIL - JUNE 2019:</b> 30.90 hrs @ \$350 94.80 hrs @ \$330 42.00 hrs @ \$265	<b>JANUARY - MARCH 2019:</b> 21.00 hrs @ \$180 2.00 hrs @ \$150 1.70 hrs @ \$00 (No Charge) <b>APRIL - JUNE 2019:</b> 45.8 hrs @ 180	\$ 109,854.00

<b>TOTAL FEES CLAIMED IN MOTION:</b>	<b>\$ 1,957,950.73</b>
Total amount of reduction of invoices paid by BBID to account for work on Dismissal Order Cases and Phases II & III:	\$207,921.50