

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>TIMOTHY KING, MARIAN ELLEN SHERIDAN, JOHN EARL HAGGARD, CHARLES JAMES RITCHARD, JAMES DAVID HOOPER and DAREN WADE RUBINGH,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>GRETCHEN WHITMER, in her official capacity as Governor of the State of Michigan, et al,</p> <p style="text-align: center;">Defendants,</p> <p style="text-align: center;">and</p> <p>CITY OF DETROIT, et al,</p> <p style="text-align: center;">Intervenor-Defendants.</p>	<p>No. 2:20-cv-13134</p> <p>Hon. Linda V. Parker</p>
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**AFFIDAVIT OF DAVID H. FINK IN SUPPORT OF THE CITY OF
DETROIT'S MOTION FOR SANCTIONS**

David H. Fink states as follows:

1. I am the Managing Partner of Fink Bressack ("FB"). I submit this Affidavit in support of the City of Detroit's request for attorneys' fees and costs pursuant to the Court's Opinion and Order (ECF No. 172).

2. FB represents the City of Detroit (the “City”) in this matter. I have been the attorney responsible for overseeing and reviewing the client bills for legal services rendered by FB.

3. The City is a longstanding FB client. The undersigned began his legal career at the Law Department of the City of Detroit, in 1977, and has represented the City as outside counsel in countless matters since leaving the City to enter private practice more than forty years ago.

4. Before taking on the election litigation arising from the 2020 General Election, FB agreed to charge a reduced blended rate of \$325 per hour for all partners (David H. Fink, Darryl Bressack, and Nathan J. Fink), a blended rate of \$225 per hour for all other FB attorneys, and a blended rate of \$75 per hour for all law clerks and legal assistants. As an additional courtesy to the City, because of the unexpectedly large volume of work involved in the election litigation, FB later agreed to discount all fees by an additional 10%.

5. FB partners David H. Fink and Darryl Bressack were both directly involved in every aspect of this litigation through January 23, 2021 (Mr. Bressack passed away suddenly on January 24, 2021, after suffering a heart attack), and they handled the majority of the work performed in this matter. FB partner Nathan J. Fink and associates Dave Bergh, John L. Mack, and Glenn R. Gayer also worked on this matter, as did law clerk Patrick J. Masterson.

6. The hourly rates charged by FB for this matter were agreed upon in advance by the clients (and then discounted by 10%). In negotiating hourly rates, FB considers overhead expenses, expenses of support personnel, and an evaluation of the prevailing hourly rates in the community for similar work. This fee is also consistent with rates charged by FB to the firm's other municipal clients. In determining the hourly rate for this matter, FB, in discussions with its client, addressed, among other things, (1) the urgency of the matter, including the need to prioritize this matter ahead of other litigation; (2) the complexity of the issues involved and the firm's prior experience with litigation seeking injunctions or emergency relief and its experience with complex legal issues; (3) the extent to which work would have to be performed by senior attorneys or partners, including a commitment that the firm's senior partner would participate directly in all aspects of the litigation; and (4) the uniqueness of the litigation.

7. From the outset, it was clear that this litigation would require immediate attention and substantial time from FB partners, including its senior partner. The hourly rate was established considering the specialized nature of the issues involved. The rate was also established considering that, unlike some municipal work, it was clear that the majority of the work would be done by the most senior attorneys. Finally, the rate was affected by the likelihood of unanticipated and unique arguments that might be (and were) made during the pendency of the litigation. That

said, the rate is substantially lower than the rates charged by FB attorneys in most litigation matters.

8. Attached to this Affidavit as Exhibit 1 are detailed time and expense records. Uncoded entries represent work defending *King v Whitmer* in the trial court. Entries coded with an "A" relate to work pertaining to appellate matters arising from *King v. Whitmer*. Entries coded with an "S" relate to work related to the sanctions motions. Also attached is a spreadsheet that subtotals for each timekeeper the work performed in each category (with totals for work defending *King v Whitmer* in the trial court identified on the spreadsheet with a "D").

9. The total hourly charges, at the City's negotiated and then discounted rates, for defending *King v Whitmer* at the trial court level are \$39,999. The total hourly charges related to appellate matters pertaining to *King v Whitmer* are \$26,077. The total hourly charges in *King v Whitmer* pertaining to the sanctions motions are \$116,116.



David H. Fink

In accordance with the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this 8th day of September, 2021

EXHIBIT 1

Fink Bressack

King v Whitmer Time Detail

11/26/2020 through 11/30/2020

Nov-26-20	DHF	Review of King et al v Whitmer et al; review of media reports regarding King lawsuit; text exchange regarding King lawsuit; telephone conference with DGB regarding King v Whitmer; review of Costantino case and Trump v Benson to identify similar allegations in King; e-mail to Mr. Sautter regarding [REDACTED] [REDACTED] e-mail to DGB regarding next steps; e-mail to Plaintiffs' counsel seeking concurrence in request to intervene; initial review of online information regarding Dominion allegations.	3.75
	DGB	Review of King v Whitmer Complaint; review of news articles regarding same; telephone conference with DHF; review of e-mail from Mr. Sautter; exchange of emails with DHF; review of e-mail from DHF regarding concurrence; review of emails from Mr. Kleinhendler; drafting of Motion to Intervene; factual investigation regarding claims; legal research for Motion to Dismiss; drafting of Motion to Dismiss.	6.25
	NJF	Email exchange with DHF and DGB regarding King Complaint; telephone conference with DHF regarding same.	0.50
	GRG	(King Case) Initial review of King v Whitmer and all exhibits; e-mail exchange with DHF, DGB regarding same.	1.50
Nov-27-20	DHF	Continued review of King Complaint and Exhibits; telephone conference with DGB regarding Motion to Intervene and Motion to Dismiss; conference call with GRG regarding factual investigation and comparison of Complaints; conference call with DGB and NJF regarding strategy; e-mail to Ms. Meingast regarding intervention; [REDACTED] [REDACTED]	6.50



[REDACTED]
[REDACTED] telephone conference with Mr. Garcia; review and revision of draft Motion to Intervene (King v Whitmer);

[REDACTED]
review of 3rd Circuit Opinion affirming dismissal of Pa lawsuit; review of memos from GRG regarding King claimants and regarding King "experts"; e-mail exchange with Mr. Sautter.

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|-----|--|------|
| DGB | <p>Drafting of Motion to Intervene in King v Whitmer; telephone conferences with DHF regarding same and regarding Motion to Dismiss; review of e-mail to Ms. Meingast; review of memo from GRG; review of affidavits submitted by plaintiffs; review of Notices of Appearance; telephone conference with counsel in Georgia lawsuit; review of filings in Georgia lawsuit; [REDACTED]
[REDACTED] review of emails regarding factual investigation into claims made in King; [REDACTED]
[REDACTED] factual investigation regarding plaintiffs' "experts" in King; drafting of Motion to Dismiss for King; drafting of Motion to intervene in same; review of emails with Mr. Sautter; [REDACTED]
[REDACTED]</p> | 4.50 |
| NJF | <p>Review of King Complaint; telephone conference with DHF and DGB regarding intervention; review of emails regarding same; review and revision of Motion to Intervene in King v Whitmer; final preparation and filing of same.</p> | 2.50 |
| JLM | <p>Preparation of appearances in King v. Whitmer; preparation of Motion to Intervene.</p> | 3.75 |
| GRG | <p>(King v Whitmer) Continued review of Plaintiffs' Complaint with exhibits; research regarding Intervenor COD's Motion to Dismiss; research regarding Plaintiffs' Complaint, affiants and experts; telephone conference with DHF and DGB; e-mail</p> | 8.50 |



exchanges with DHF and DGB; review of ruling in Trump v Pennsylvania case; telephone conference with DHF; review of Johnson v. Benson Supreme Court filings; preparation of side-by-side comparison of King Complaint to others.

	PJM	[REDACTED]	[REDACTED]
		[REDACTED]	
Nov-28-20	DHF	[REDACTED]	[REDACTED]
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
	DGB	Exchange of emails regarding King v Whitmer; review of Georgia Sidney Powell filings; review of Dominion response to lawsuits; review of emails regarding legal research; exchange of emails regarding same; exchange of emails regarding Johnson mandamus action; conference call with DHF and NJF; legal research regarding same;	1.25
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
	NJF	[REDACTED]	[REDACTED]
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
	GRG	[REDACTED]	[REDACTED]
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
	PJM	[REDACTED]	[REDACTED]
		[REDACTED]	
		[REDACTED]	
Nov-29-20	DHF	[REDACTED]	[REDACTED]
		[REDACTED]	



	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
DGB	[REDACTED]	[REDACTED]
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
NJF	[REDACTED]	[REDACTED]
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
JLM	[REDACTED]	[REDACTED]
	[REDACTED]	
GRG	[REDACTED]	[REDACTED]
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	

Nov-30-20	DHF	<p>Telephone conference with Mr. Thomas; review of King v Whitmer Amended Complaint, Exhibits and Emergency Motion; e-mail messages to counsel for DNC/MDP and office of Attorney General; telephone conferences with DGB and with NJF regarding King Motions [REDACTED] [REDACTED] [REDACTED] telephone conference with Mr. Sautter; [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] telephone conference with GRG regarding affidavits;</p>	2.50
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review of Motion to Intervene by Robert Davis in King.

DGB Review of Amended complaint in King;
review of Motion for TRO; review of Motion
to Seal; telephone conference with DHF;

2.25

_____ review of proofs of service in King; review of e-mail from Mr. Eldridge; _____

review of emails regarding Dominion;

(Time capped at 12.00 hrs.)

NJF Review of King First Amended Complaint,
Emergency Motion for TRO, and Emergency
Motion to Seal; [REDACTED]

2.00

review of
DNC and MDP's Motion to Intervene (King);
review of Appearances regarding same;
review of Robert Davis's Motion to Intervene
(King);

JLM

GRG



[REDACTED]

Nov-4--
Nov-30-20

[REDACTED]

[REDACTED]

[REDACTED]



Fink Bressack
King v Whitmer Time Detail
12/01/2020 through 12/31/2020

Professional Services

Hours

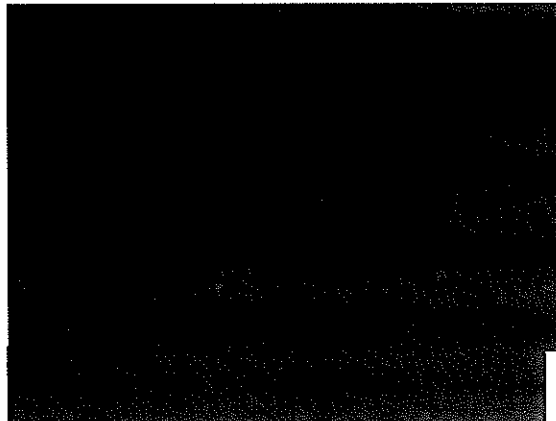
Dec-01-20

DHF

1.00



review of filings in King v Whitmer;



DGB [REDACTED] 1.50
[REDACTED]
[REDACTED]
[REDACTED] review of
Motion to Expedite in King; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] review
of Order regarding service in King; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
review of emails regarding Response to
Motion in King; drafting of Response.
[REDACTED]

NJF [REDACTED] 0.50
[REDACTED]
[REDACTED]
[REDACTED] review of Robert
Davis's Motion to Expedite (King); [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] review of Order
Regarding Briefing Schedule (King); [REDACTED]
[REDACTED]

JLM [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



	GRG	[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
Dec-02-20	DHF	[REDACTED] [REDACTED] review of Response to Motions to Intervene; review of Reply in Support of Davis Motion to Intervene; [REDACTED] [REDACTED] [REDACTED] [REDACTED] preparation of fact section for King v Whitmer brief; review of Motion to Seal and draft Response; review of Response, as filed; review of Response to Motion to Seal by Paterson; review of Order regarding Intervention; [REDACTED] [REDACTED] [REDACTED] [REDACTED]	2.00
	DGB	[REDACTED] [REDACTED] [REDACTED] [REDACTED] review of Response to Motion to Intervene in King; review and revision of response to Motion to Seal in King; drafting of Response to Motion for TRO in King; factual investigation for same; legal research for same; telephone conferences with Mr. Thomas for same; review of Reply ISO Motion to Intervene filed by Robert Davis in King; exchange of emails with Mr. Thomas regarding Response to Motion for TRO; preparation of exhibits for Response to same; telephone conferences with DHF regarding same; additional review and revision of same. [REDACTED]	8.00
	NJF	Review of Plaintiffs' Response to Motion to Intervene (King); email exchange with DHF and DGB regarding same; review of Opinion and Order Granting Motions to Intervene	4.00



(King); preparation of Response to Emergency Motion to File Under Seal (King); review and revision of Response to Motion for TRO (King); telephone conferences with DHF, DGB and JLM regarding same; final preparation and filing of King filings; review of King filings by Co-Defendants.

JLM [REDACTED] 0.25

[REDACTED] preparation of motion to extend page limit in King v Whitmer.

GRG Research for and assistance with Defendants' Response to Plaintiffs' Emergency Motion for Temporary Restraining Order and Emergency Motion to Seal (King); telephone conferences with and e-mail exchanges with DHF regarding same. 9.00

Dec-03-20 DHF [REDACTED] 1.50

continued review of Response Briefs filed in King v Whitmer; [REDACTED]

[REDACTED] review of motion seeking amicus status in King v Whitmer; [REDACTED]

[REDACTED] e-mail exchange regarding request for extension from Plaintiffs in King v Whitmer.

DGB [REDACTED] 4.50

[REDACTED] review of Motions to Strike in King; [REDACTED]

[REDACTED] review of Motion to Extend Time in King; review of proposed



amicus brief in King; review of emails regarding Motion to Extend Time; [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED] review of filings by Robert Davis in King; review of Order on Motion to Strike; review of Order denying amicus in King; review of email from Lawyers' Committee for Civil Rights for King; review of emails regarding same; review of NAACP Motion for Leave to File Amicus; review of proposed amicus; review of Reply in support of Motion to Seal; review of Reply in support of Motion for TRO; [REDACTED]
 [REDACTED] (Time capped at 12.00 hrs.)

NJF Review of Intervenor-Defendant Davis's Motion to Strike Plaintiffs' Amended Complaint (King); [REDACTED]
 [REDACTED] review of NAACP's Motion to Intervene (King); review of Plaintiffs' Reply In Support of Emergency Motion for Injunctive Relief (King); review of Plaintiffs' Reply In Support of Motion to Seal (King). 2.75

GRG [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Dec-04-20 DHF [REDACTED] 4.00
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED] review of "expert" reports of Mr. Braynard in Georgia, Arizona and Pennsylvania; internet research regarding Mr. Braynard; [REDACTED]
 [REDACTED] review of newspaper and magazine articles about Mr. Braynard; [REDACTED]



[REDACTED]
 [REDACTED] review of pleadings in Wisconsin
 litigation; review of pleadings in Georgia
 litigation; review of Supplemental Brief in
 King v Whitmer, regarding Feehan v
 Wisconsin Elections Commission. [REDACTED]
 [REDACTED]

DGB

0.25

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 review of Order from Judge Parker;
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

NJF

2.00

Review of Intervenor-Defendant Robert
 Davis's Notice of Withdrawal of Emergency
 Motion to Strike (King); review of
 Appearances of counsel for NAACP (King);
 review of Order Granting NAACP's Motion
 for Leave to File Amicus Brief (King);
 review of NAACP's Amicus Brief; review of
 Plaintiffs' Supplemental Brief In Support of
 Motion for TRO (King); [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

JLM

[REDACTED]
 [REDACTED]

GRG

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Dec-05-20

DHF

Telephone conference with Mr. Thomas;
 telephone conferences with NJF and with

2.00



	GRG	regarding election lawsuits in other states; review of Wisconsin Order; review of Nevada order.	
	DGB	[REDACTED] [REDACTED] review of Opinion and Order in Nevada lawsuit; review of Motion filed by Davis in King.	0.50
	NJF	[REDACTED] [REDACTED] [REDACTED] review of news articles regarding pending cases in Michigan and in other states; telephone conference with DHF regarding same; review of emails from DHF regarding same.	0.75
	GRG	Telephone conference with DHF regarding election cases in other states; research regarding election cases in other states.	1.00
Dec-06-20	DHF	[REDACTED] [REDACTED] [REDACTED] review of Text-Only Order in King v Whitmer (Court dispensing with oral argument); review of rebuttal expert reports filed in Georgia; review of Supplemental Response in King v Whitmer; [REDACTED] [REDACTED]	1.25
	DGB	Review of Georgia filings regarding plaintiffs' experts in King matter; review of Order in King; review of Supplemental Response filed in King; review of Order denying Motion to Take Judicial Notice; [REDACTED] [REDACTED]	1.00
	NJF	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]
	GRG	Research regarding election cases in other states; [REDACTED] [REDACTED]	3.00
Dec-07-20	DHF	Early morning (1:30 AM) review of Opinion and Order denying Motion for TRO; e-mail messages to clients and others regarding Opinion and Order; [REDACTED]	1.50



[illegible]

DGB	Review of Opinion and Order in King; review of emails regarding same; [REDACTED]	1.00
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[REDACTED]

NJF	Review of Opinion and Order Denying Motion for TRO (King); [REDACTED]	0.75
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GRG [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] telephone conferences with DGB

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dec-08-20

DHF

0.50 A

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] review of [REDACTED] Notice of
Appeal of King v Whitmer; [REDACTED]
[REDACTED]
[REDACTED]

DGB

0.50 A

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] review of Notice of Appeal in King v
Whitmer; telephone conference with DHF
regarding same.

NJF

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

GRG

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dec-09-20

DHF

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



DGB

[REDACTED]

[REDACTED]

[REDACTED]

NJF

[REDACTED]

[REDACTED]

GRG

[REDACTED]

[REDACTED]

Dec-10-20

DHF

[REDACTED]

0.25 A



0.75 A

[REDACTED]

[REDACTED]

[REDACTED]

5.75 A

Telephone conference with [REDACTED] regarding Supreme Court King v Whitmer filing; telephone conferences with DGB and with NJF regarding Cert Petition; e-mail messages sent and received regarding King Petition for Writ; review of King Supreme Court filing; preparation of comments for DGB regarding new arguments in King

Supreme Court filing; conference call with Eli Savit and NJF; telephone conference with Mr. Savit; e-mail to Mr. Garcia; e-mail to Mr. Thomas and Dr. Stewart; review of e-mail messages from Mr. Thomas and Mr. Stewart; review of trial court brief in King v Whitmer; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

DGB Legal research regarding petition for writ of certiorari; exchange of emails with DHF; exchange of emails with Ms. Meingast; drafting of Response to Petition; telephone conferences with DHF regarding same; telephone conferences with DHF and NJF regarding same; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

7.00 A

NJF Telephone conference with DHF and DGB regarding SCOTUS cert petition (King); review of SCOTUS cert petition (King); [REDACTED]
[REDACTED]
conference call with Mr. Savit and DHF; [REDACTED]
[REDACTED]
[REDACTED]

1.00 A

JLM [REDACTED]
[REDACTED]

Dec-13-20

DHF Telephone conferences with DGB and with NJF; review of reports of Stanley Young, Robert Wilgus, Eric Quinnell, William Briggs, Russell Ramsland, Jr., and Louis Bouchard and preparation of notes for briefing; review of Georgia affidavits; telephone conferences with DGB and with NJF regarding [REDACTED]
[REDACTED]
[REDACTED] review of "Letter related to Emergency Petition" (requesting permission to file new documents under seal regarding Antrim County voting machines and regarding alleged affidavits that "evince

8.50 A



international interference in the election");
preparation for partial draft introduction.

DGB Drafting of Response to King petition;
telephone conferences with DHF; factual
investigation; regarding same; legal research
for same; drafting of same; review of
declaration regarding Dominion; exchange of
emails regarding same.

8.25 A

NJF Email exchange with DHF and DGB
regarding SCOTUS brief (King); telephone
conference with DHF regarding same.

0.25 A

JLM

Dec-14-20

DHF

review of State of Michigan
trial court response in King v Whitmer
(reviewed in preparation for Supreme Court
Response, if necessary); continued analysis
of "expert" reports in King v Whitmer;
review of DNC trial court response in King v
Whitmer, including attachments and expert
reports offered by DNC; review of media
reports regarding Antrim County Circuit
Court ruling on documents which King
Plaintiffs seek to submit to US Supreme
Court;

1.50 A

review of draft Rule
11 Complaint for King v Whitmer; e-mail to
NJF regarding Rule 11 draft Complaint;

1.00 S

DGB Drafting of Answer to Petition for Cert;
telephone conferences with DHF regarding

same; legal research for same; [REDACTED]

2.50 A

[REDACTED]

review of Rule

0.25 S

11 Motion draft; [REDACTED]

[REDACTED]

NJF Telephone conference with DHF regarding SCOTUS brief and Rule 11 letter (King); preparation of Rule 11 Motion (King); email exchange with DHF regarding same; email to Mr. Garcia regarding same.

2.50 S

JLM

[REDACTED]

[REDACTED]

GRG Telephone conference with DHF regarding King v Whitmer; review of State Response to motions; e-mail to DHF regarding same; research regarding Sydney Powell public statements; research regarding [REDACTED]

4.00 A

Dec-15-20

DHF

[REDACTED]

[REDACTED]

1.50 S

[REDACTED] review and revision of Rule 11 motion; review of case law regarding Rule 11; e-mail exchange regarding Rule 11 motion; telephone conference with Mr. Garcia; [REDACTED]

[REDACTED]

DGB

[REDACTED]

[REDACTED]



[REDACTED]

1.75 S

[REDACTED] review of Rule 11 Motion;
review of email regarding [REDACTED];
factual investigation for Rule 11; exchange
of emails regarding same; telephone
conference with DHF regarding same;

[REDACTED] review of Notice of
Supplemental Authority filed with SCOTUS;
review of opinions and orders entered in GA;
review of same from AZ.

1.50 A

NJF

[REDACTED]

[REDACTED]

1.50 S

[REDACTED] review
and revision of Rule 11 Motion (King);
email to all counsel regarding same; email
exchange with DHF and DGB regarding
same; [REDACTED]

JLM

[REDACTED]

[REDACTED]

GRG

[REDACTED]

[REDACTED]

Dec-16-20

DHF

[REDACTED]

[REDACTED]

0.25 S

[REDACTED] telephone conference with
NJF regarding status of Rule 11 motion in
King; review of rulings in other states;
telephone conference with DGB; e-mail
exchange with GRG regarding official
election results.

1.00 A

DGB

[REDACTED]

[REDACTED]

0.25 S

[REDACTED] exchange of
emails Rule 11 Motion in King; [REDACTED]

0.25 A

[REDACTED] telephone conference with DHF;

NJF

Telephone conference with DHF regarding

[REDACTED]



		status of Rule 11 letter (King); [REDACTED]	0.25 S
		[REDACTED]	
	GRG	Research regarding King Supreme Court filing; research regarding nationwide election cases; research regarding election results in Michigan and Detroit in 2016 and 2020; email to DHF regarding same.	2.00 A
Dec-17-20	DHF	Telephone conference with Mr. Thomas; review of detailed letter from Dominion regarding defamatory statements by Ms. Powell; [REDACTED]	1.75
		[REDACTED]	
		[REDACTED] telephone conference with NJF regarding Dominion letter; telephone conference with GRG regarding [REDACTED]	
		[REDACTED] research regarding [REDACTED]	
	DGB	Drafting of Motion to Dismiss for King v Whitmer; exchange of messages with Mr. Garcia; [REDACTED]	2.00
	NJF	Review of Dominion defamation retraction demand to Sidney Powell; telephone conference with DHF regarding same; [REDACTED]	0.75
	GRG	Research regarding attorney affiliations with organizations in all election cases; telephone conference with DHF regarding same; email to DHF regarding same; review of Dominion Demand Letter to Sidney Powell.	2.50
Dec-18-20	DHF	Review of Supreme Court filings and related e-mail messages.	3.25 A
	DGB	[REDACTED] review of filings before SCOTUS in King matter; legal research regarding same; exchange of emails with JLM regarding same; [REDACTED]	3.00 A
	JLM	Research on Supreme Court rules for	1.00 A



responses to motions and petitions for cert;
e-mail exchange regarding SCOTUS
procedures.

Dec-19-20

DHF Telephone conferences with GRG regarding
investigation to support motion for sanctions
in King v Whitmer; [REDACTED]

[REDACTED]
1.00 S

[REDACTED]
review of media reports
regarding Sidney Powell; telephone
conference with Mr. Thomas.

DGB

[REDACTED]
drafting of MTD for King.

[REDACTED]
2.25

GRG Telephone conferences with DHF regarding
facts in support of motion for sanctions;
research regarding out of balance precincts in
Wayne County; e-mail exchange with DHF
regarding same; [REDACTED]

[REDACTED]
1.25 S

Dec-21-20

DHF

[REDACTED]
DGB Drafting of Motion to Dismiss in King;

[REDACTED]
4.00

[REDACTED]
1.00 S

[REDACTED]
exchange of emails with DHF regarding
Motion to Dismiss in King; telephone
conference with DHF regarding same;
factual investigation for Motion for
Sanctions in King.

JLM Review and revision of Motion to Dismiss in
King.

0.75



	GRG	Research regarding Sanctions Motion in King v Whitmer; research regarding public statements made by Plaintiff attorneys in same; [REDACTED]	[REDACTED] 2.75 S
Dec-22-20	DHF	Review and revision of draft Motion to Dismiss and for Sanctions (King v Whitmer); [REDACTED] review and revision of sanctions section of brief [REDACTED]	[REDACTED] 2.00 0.50 S
	DGB	Drafting of Motion to Dismiss in King; exchange of emails with DHF regarding same; telephone conference with Mr. Eldridge; exchange of emails with Mr. Eldridge; exchange of emails regarding concurrence in King [REDACTED] [REDACTED] continued drafting of Motion for Sanctions in King; review of amicus in King; review of Motion for Sanctions filed by Davis.	[REDACTED] 4.75 4.00 S
	NJF	Review of SOM Defendants' Motion to Dismiss (King); review of Robert Davis's Motion for Sanctions; review and revision of COD's Motion to Dismiss.	[REDACTED] 1.25 0.25 S
	JLM	Review and revision of Motion to Dismiss in King.	2.25
	GRG	Research regarding public statements made by Plaintiff attorneys in King v Whitmer; email to DHF, DGB and NJF regarding same.	1.50 S
Dec-23-20	DHF	[REDACTED] [REDACTED] review of e-mail messages regarding statements by counsel of record in King; [REDACTED]	[REDACTED] 0.50 S
	DGB	Review of Motions to Dismiss filed in King; review of Motion for Sanctions filed in King; [REDACTED] [REDACTED] review of Order in King; factual investigation for Motion for	[REDACTED] 3.00 S



[REDACTED]

GRG Research for Rule 11 Sanctions motion;
research regarding nationwide election cases;
email to DHF, DGB and NJF regarding
same; review of State Response to Motion to
Expedite (King v Whitmer, SCOTUS).

[REDACTED]

0.50

2.00 S

Dec-29-20

DHF

[REDACTED]

[REDACTED]

DGB

[REDACTED]

[REDACTED]

NJF

[REDACTED]

[REDACTED]

JLM

[REDACTED]

[REDACTED]

Dec-30-20

DHF Review of Kleinhendler letter to S Court;

[REDACTED]
[REDACTED]
[REDACTED] e-mail exchange
regarding King v Whitmer Rule 11 Motion.

[REDACTED]

0.25 A

0.25 S

DGB

[REDACTED]

[REDACTED]



[REDACTED]
[REDACTED] review of briefing filed in King;
exchange of emails with DHF regarding
same [REDACTED]
[REDACTED]

0.50 A

NJF Exchange of messages with DHF and DGB
regarding Rule 11 Motion (King).

0.25 S

JLM [REDACTED]
[REDACTED]

[REDACTED]

Dec-31-20

DHF [REDACTED]
[REDACTED]
review of draft sanctions motion.

[REDACTED]

0.25 S

DGB [REDACTED]
[REDACTED]
[REDACTED] drafting of Motion for Sanctions in
King.

[REDACTED]

3.00 S

GRG [REDACTED]
[REDACTED]

[REDACTED]

Dec-1—
Dec-31-20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Fink Bressack
 King v Whitmer Time Detail
 01/01/2021 through 01/31/2021

Professional Services			<u>Hours</u>	
Jan-01-21	DGB	Drafting of Motion for Sanctions.	1.75	S
Jan-02-21	DGB	Drafting of Motion for Sanctions.	5.50	S
Jan-03-21	DHF	Review and revision of draft Rule 11 motion; review of transcript of telephone conference involving President Trump, Mark Meadows, Georgia Secretary of State Raffensberger and others; telephone conference with DGB regarding draft motion and regarding remaining pending matters; telephone conference with [REDACTED] review of Plaintiffs' Motion to Extend Deadline for Filing Response to Robert Davis's Motion for Sanctions.	2.75	S
	DGB	Drafting of Motion for Sanctions.	6.00	S
	NJF	Review of Plaintiffs' Motion to Extend Deadline for Filing Response to Robert Davis's Motion for Sanctions.	0.25	S

Jan-04-21

DHF Continued review and revision of draft Rule 11 motion; e-mail to GRG; telephone conferences with DGB regarding draft Brief;

[REDACTED]
6.75 S

DGB Drafting of Motion for Sanctions; telephone conferences with DHF regarding same; exchange of emails regarding same.

11.75 S

NJF Review of draft Motion for Sanctions (King); review of emails regarding same; telephone conference with DHF regarding same;

[REDACTED]
0.50 S

JLM Research regarding Rule 11 sanctions and assistance with preparation of brief in support of sanctions.

2.75 S

GRG Research regarding [REDACTED]
[REDACTED] research for Sanctions Motion; emails to DHF, DGB regarding same.

3.50 S

Jan-05-21

DHF Review and revision of draft Rule 11 Brief; [REDACTED] review of expert reports and revised draft Motion and Brief; review and revision of draft Rule 11 Motion; telephone conferences with DGB and with NJF regarding [REDACTED]
[REDACTED] telephone conference with Ms. Gurewitz.

[REDACTED]
4.50 S

DGB Drafting of Motion for Sanctions; preparation of exhibits for same; factual investigation for same; telephone conferences with DHF regarding same; review of DHF edits regarding same; telephone conferences with GRG regarding same; preparation of same for filing.

9.50 S



NJF Review and revision of Rule 11 Motion (King); email exchange with DGB regarding same; telephone conference with DHF regarding same; review and revision of same; final preparation and filing of same. 1.25 S

JLM Review and revision of Motion for Sanctions; preparation of motion to extend page limit. 1.00 S

GRG Assistance with Sanctions Motion (King v Whitmer); multiple calls and e-mail exchanges with DGB. 7.00 S

Jan-06-21

DHF [REDACTED] 0.50 S
review of public statements by opposing counsel; review of e-mail messages regarding Rule 11 Motion. [REDACTED]

DGB Review of e-mail messages regarding sanctions motion, [REDACTED] 1.00 S
[REDACTED] e-mail exchange with Mr. Hoese regarding tweets by opposing counsel; review of Lin Wood tweets;

NJF Review of e-mail messages regarding sanctions motion; e-mail regarding service of motion for sanctions on opposing counsel who have not filed proper appearances; 0.50 S

Jan-07-21

DHF E-mail exchange with Mr. Thomas; [REDACTED] 1.00 S
[REDACTED] review of media reports regarding incitement by opposing counsel; conference call with DGB and GRG regarding L. Lin Wood and Sidney Powell tweets and regarding evidence of their incitement of January 6, 2021 activities; [REDACTED]



[REDACTED]

DGB Conference call with DHF and GRG regarding incitement of insurrection by King v Whitmer counsel; review of related tweets;

[REDACTED]
1.00 S

[REDACTED]

[REDACTED] review of e-mail regarding Ms. Babbitt's retweeting of tweet by opposing counsel; online research regarding incitement by opposing counsel.

NJF Review of e-mail messages and follow-up on service of sanctions motion on opposing counsel; [REDACTED]

[REDACTED]
0.25 S

GRG Telephone conference with NJF regarding election cases; research regarding upcoming Reply brief for Sanctions Motion in King v Whitmer; telephone conference with DHF and DGB regarding Sanctions Motion; research regarding public statement of attorneys and rioters for sanctions motion.

6.50 S

Jan-08-21

DHF Review of American Lawyer article How Trump-Tied Lawyers' Conspiracy Theories Moved From Court to a Capitol Mob; review of tweets from Lin Wood; review of social media postings that connect attorneys in Detroit litigation to Capitol mob; telephone conference with DGB; review of defamation lawsuit filed by Dominion against Ms. Powell; review of US Supreme Court Notice of Supplemental Authority (filed by Plaintiffs in King v Whitmer); review of Motion for Court to Take Judicial Notice of Motion to Withdraw as Counsel in Eastern District of Pa, filed in King v Whitmer.



[REDACTED]
3.75 S
0.75 A

DGB E-mail exchange regarding service; e-mail to all Plaintiffs' counsel who have not registered for electronic filing in King v Whitmer; review of American Lawyer article about role of election lawyers in inciting Capitol insurrection; review of media reports and

[REDACTED]
1.50 A
5.00 S



analysis of potential supplemental brief; review of Dominion defamation lawsuit and related media reports; review of reports regarding Lin Wood being banned from twitter; review of Lin Wood tweet, retweeting (on Parlor) claim that Babbit shooting is a false flag; e-mail exchanges with DHF, NJF and GRG regarding issues related to Reply or Supplemental Brief; review of Supreme Court Petitioners' Notice of Supplemental Authority, filed in King v Whitmer (claiming that an alternative slate of electors cast Michigan electoral votes for Trump and arguing that an "Interim Report" established "inherent errors" and "systemic fraud" with the Dominion Voting System in Antrim County); review of Motion to Take Judicial Notice, filed by Mr. Paterson.

	NJF	Email exchange with DGB regarding service of Motion for Sanctions.	0.25	S
	GRG	Research regarding upcoming Reply brief for Sanctions Motion in King v Whitmer; multiple e-mail exchanges with DHF and DGB; research regarding public statement of attorneys and rioters for sanctions motion.	6.50	S
Jan-09-21	DHF	E-mail exchange with GRG regarding dismissal of election cases in Georgia; review of Notice of Voluntary Dismissal (filed in Northern District of Georgia); review of Response to Notice of Dismissal (denying settlement).	0.75	S
	DGB	Review of e-mail messages and attachments related to Georgia federal court dismissals; review of defamation complaint.	1.25	S
	GRG	Research regarding dismissals in Georgia election cases and relationship to Michigan election cases; email to DHF regarding same.	1.00	S
Jan-10-21	GRG	Research regarding DC rioters arrested connections to Powell and Wood.	4.00	S
Jan-11-21	DHF	 review of extension request from King v Whitmer Plaintiffs' counsel; text exchange with Mr. Garcia; telephone conference with DGB; telephone	 2.75	-



conference with Mr. Garcia; telephone conference with Ms. Meingast; e-mail exchange with DNC counsel; review of improperly filed Motion for Extension of Time; preparation of draft response to anticipated Motion for Extension of Time to File Response to Motion to Dismiss and for Sanctions.

DGB Telephone conference with DHF; review of e-mail messages [REDACTED] review of e-mail regarding [REDACTED]; review of text-only order denying Motion to Expedite Consideration of the request for certiorari filed by King v Whitmer Plaintiffs; e-mail to Mr. Garcia; [REDACTED] review of improperly filed Motion to Extend Time and email exchange regarding proper response (or non-response).

[REDACTED]
0.75 A
1.00

NJF Review of Plaintiffs Motion to Extend Time to Respond to Motion to Dismiss (misfiled by Plaintiffs) (King); review of email exchange regarding request for concurrence regarding same; telephone conference with DHF regarding same.

0.50

GRG Research for reply In Support of Motion for Sanctions (King v Whitmer); Internet research regarding election cases; email to DHF regarding election matter; assistance with Response to Motion for Extension of Time to File Response (King. v. Whitmer).

3.50 S

Jan-12-21

DHF Review of dockets; telephone conference with NJF regarding Motion for Extension of time to file response in King v Whitmer; review of Court Order striking motion and setting deadline for properly filed motion; review of corrected motion; telephone conference with NJF regarding preparation of Response to Motion for Extension; review of Response, as filed; review of Court Order, granting in part Motion for Extension; [REDACTED]

[REDACTED]
1.25 S



[REDACTED]

DGB Drafting of Response to Certiorari Request; telephone conferences with DHF regarding same; telephone conference with DHF and SC expert regarding same; continued draft of same; review of Judge Parker's Order striking motion and setting deadline for properly filed motion; review of corrected motion; review of Response to Motion for Extension; review of Court Order, granting in part and denying in part Motion for Extension; [REDACTED]

[REDACTED]
3.00 A
0.75

NJF Review of Order Striking Plaintiffs' Motion to Extend Time to File Response to Motion to Dismiss; telephone conference with DHF regarding same; review of Plaintiffs' Re filed Motion to Extend Time to File Response to Motion to Dismiss; preparation of Response to same; filing of same; telephone conference with DGB regarding same; review of Text-Only Order Granting in Part and Denying in Part Plaintiffs' Motion to Extend Time to File Response.

1.25

JLM [REDACTED]

GRG Research for Reply in support of Motion for Sanctions (King v Whitmer); review of filed documents and scheduling of election hearings.

4.50 S

Jan-13-21

DHF Telephone conferences with DGB regarding Response to Petition for Cert; review of Delaware ruling regarding Lin Wood and related e-mail message; review of Law360 report regarding Lin Wood; review and revision of draft SCOTUS Brief.

2.50 A

DGB [REDACTED]

[REDACTED]
telephone conferences with DHF regarding response to certiorari; review and revision of

[REDACTED]
6.50 A



Response to Petition for Writ of Certiorari;
review of Delaware ruling regarding Lin
Wood and Law360 report; e-mail exchange
with NJF and GRG regarding Supreme Court
filing of Response; review of Stoddard
Notice of Hearing, as filed;

JLM

GRG

Research regarding Response to Petition for
Writ of Certiorari (King v Whitmer); calls to
DC Printer; e-mail exchanges with DGB and
NJF regarding same; research for reply to
sanctions motion and election cases.

Jan-14-21

DHF

Review and revision of SCOTUS Brief;
telephone conferences with DGB regarding
SCOTUS brief; review of exhibits; e-mail
messages regarding Brief; review of State of
Michigan SCOTUS Brief; review of State of
Michigan Notice of Joinder/Concurrence in
COD Motion for Sanctions in King v
Whitmer; initial review of late night filings
by Plaintiffs in King v Whitmer, opposing
sanctions and purporting to voluntarily
dismiss the case in chief; review of State of
Michigan Response to Cert Petition in
SCOTUS.

DGB

Preparation of Response to Petition for Cert;
exchange of emails with GRG regarding
same; telephone conferences with DHF
regarding same; review of DHF edits to
same; continued drafting of same; legal
research for same; factual investigation
regarding same; preparation of exhibits for
same; review of State of Michigan Notice of
Joinder/Concurrence in COD Motion for
Sanctions in King v Whitmer; e-mail to Mr.
Garcia with Response to Petition for Writ of
Cert; review of State of Michigan SCOTUS
filings.

NJF

Review and revision of SCOTUS Response
to Cert Petition (King); telephone
conferences with GRG regarding final
preparation and filing procedures; final
preparation and filing of same.

3.50 A
1.50 S

4.00 A
0.50 S

6.25 A
0.50 S

1.75 A



	GRG	Assistance with drafting and filing of Response to Petition for Writ of Certiorari (King v Whitmer); e-mail exchanges and telephone conference with DGB regarding same; telephone conferences with NJF regarding same.	7.50 A
Jan-15-21	DHF	Review of Notices of Voluntary Dismissal in King v Whitmer; review of Response to Motion to Dismiss and for Sanctions in King v Whitmer; telephone conferences with DGB and with NJF regarding Response; e-mail exchange regarding response to attempts to voluntarily dismiss selected defendants.	1.50
	DGB	Review of notices of "voluntary dismissal"; review of response to Motion for Sanctions; legal research regarding dismissals; telephone conferences with DHF; telephone conference with Ms. Meingast; review of e-mail from Ms. Meingast; telephone conference with Mr. Eldridge; e-mail to Mr. Garcia.	2.00
	NJF	Review of Plaintiffs' Response to Motion to Dismiss and for Sanctions (King); review of Plaintiffs' Notices of Voluntary Dismissal; email exchange with DHF and DGB regarding same; email exchange with GRG regarding same; online research regarding "expert" John Lott.	1.50
	GRG	Review of Plaintiff's Response to Motions to Dismiss and Award of Sanctions; research regarding same.	2.00
	PJM	Research regarding Reply Brief In Support of Motion to Dismiss and Motion for Sec. 1927 sanctions.	4.00 S
Jan-16-21	DHF	Review and response to e-mail from Ms. Gurewitz; e-mail exchange with DGB.	0.50
	DGB	Review of e-mail messages regarding "voluntary dismissal" as to selected Defendants, including intervening defendants; e-mail to DHF.	0.50
	PJM	Research regarding Reply Brief In Support of Motion to Dismiss and Motion for Sec. 1927 sanctions.	5.00 S



Jan-17-21	DHF	Email exchange with NJF regarding dismissals; email exchange with DGB, Mr. Eldridge, Ms. Gurewitz and Ms. Meingast regarding "dismissals" and pendency of appeal; review of Sunday evening Notice of Voluntary Dismissal (Motion to permit voluntary dismissal) as to Robert Davis; e-mail exchange with DGB regarding new filing.	1.00
	DGB	Exchange of emails with DHF, Mr. Eldridge and Ms. Meingast regarding dismissals in King; review of Sunday night "Notice of Voluntary Dismissal" regarding Robert Davis.	0.50
	NJF	Review of Plaintiffs' Motion for Voluntary Dismissal (King); review of email exchange regarding same.	0.25
Jan-18-21	DHF	Review of e-mail messages between DGB and Ms. Lambert; review of Response and analysis of issues for Reply.	1.25
	DGB	Email exchange with other defense counsel [REDACTED], e-mail to Ms. Lambert regarding dismissal/withdrawal of appeals; review of e-mail from Ms. Lambert; e-mail to Ms. Lambert consenting to dismissal of appeal and Petition for Writ to SCOTUS; research regarding Reply in Support of Motion to Dismiss and for Sanctions.	[REDACTED] 1.50 1.50 A
	PJM	Research regarding Reply Brief In Support of Motion to Dismiss and Motion for Sec. 1927 sanctions.	0.50 S
Jan-19-21	PJM	Research regarding Reply Brief In Support of Motion to Dismiss and Motion for Sec. 1927 sanctions.	2.00 S
Jan-20-21	DHF	Review of Plaintiffs' Opposition to Rule 11 Motion [REDACTED], telephone conferences with DGB and with NJF regarding Responses and necessary Replies; review of Davis Motion to Strike Notice of Voluntary Dismissal.	[REDACTED] 1.50 S .25



DGB Factual investigation for response to Motion for Sanctions; drafting of Response; telephone conference with DHF regarding same; telephone conference with DHF and NJF regarding same; review of Motion to Strike Notice of Voluntary Dismissal, filed by Robert Davis.

0.50
3.50 S

NJF Review of Plaintiffs' Response to COD's Motion for Rule 11 Sanctions; telephone conference with DHF and DGB regarding same.

1.00 S

PJM Preparation of draft of Reply Brief In Support of Motion to Dismiss and Motion for Sec. 1927 sanctions.

7.50 S

Jan-21-21

DHF Preparation of draft Reply Brief; [REDACTED] e-mail to PM regarding research to support Reply Brief; review of e-mail messages from GRG with Powell and Wood tweets and postings on Parlor; e-mail exchange and telephone conference with Professor Grimmer regarding John Lott; e-mail to Ms. Lambert regarding delay in dismissing appeal; review of e-mail from Ms. Lambert, claiming "Sidney Powell's team is preparing" a notice of dismissal of appeal; e-mail to Professor Eggers regarding John Lott; review of exhibits in potential exhibits for Reply Brief; review of e-mail messages regarding John Lott; review of Response Brief on sanctions and analysis of signature issue.

0.50 A
4.25 S

NJF Telephone conference with PJM regarding Reply In Support of Rule 11 Motion and Reply In Support of Motion for Sanctions (from Motion to Dismiss) (King); telephone conference with DGB regarding same.

0.50 S

GRG Review of social media screenshots regarding COD's Reply In Support of Motion for Sanctions; emails to DGB regarding same.

1.50 S

PJM Research regarding Reply Brief In Support of Motion for Rule 11 Sanctions; e-mail message to DGB and NJF regarding same.

4.50 S



DHF

DGB

GRG Research for Reply in support of Sanctions Motion; emails to DGB regarding same.

3.50 5

PJM Research regarding Reply Brief In Support of Motion for Rule 11 Sanctions; preparation of draft sections of Reply Brief.

5.50 5

Jan-23-21

DHF Review of draft Reply Brief on Rule 11 sanctions.

0.50 S

DGB Preparation of draft Reply Brief; review of e-mail messages regarding research supporting Reply Brief; e-mail to DHF, NJF and GRG regarding draft Reply.

6.00 S

Jan-24-21

DHF Review and revision draft Response to Rule 11 Motion and Brief; e-mail to DGB regarding brief; [REDACTED]

2.005

Jan-25-21

DHF Review and revision of draft Reply Brief;

review of Opinion and

0.75 s

Order Denying Davis Motion to Strike
(King); [REDACTED]

NJF Review of Opinion and Order Denying
Robert Davis' Motion to Strike (King);
review of Order Requiring Response.

[REDACTED]
2.00 S

[REDACTED] review and
revision of Reply In Support of Motion for
Rule 11 Sanctions (King); [REDACTED]
[REDACTED]

Jan-26-21

DHF Review of e-mail [REDACTED] with
attached draft addition; review and revision
of draft Reply Brief; review of stipulation of
voluntary dismissal of appeal to 6th Circuit;
review of Order Granting Stipulation to
Voluntarily Dismiss; telephone conference
with NJF.

[REDACTED]
0.50A
3.50 S

NJF Review and revision of Reply In Support of
Rule 11 Motion (King); telephone
conference with PJM regarding Reply In
Support of Motion for Sanctions; telephone
conference with DHF regarding same; final
preparation of Reply In Support of Rule 11
Motion (King).

3.50 S

GRG Assistance with draft of Reply in support of
COD's Motion for Sanctions; preparation of
exhibits for same; multiple telephone
conferences with NJF regarding same;
multiple e-mail exchanges with NJF
regarding same; editing of final draft of
same.

7.00 S

PJM Review of Plaintiffs' Response to Motion to
Dismiss and Motion for Sec. 1927 sanctions.

[REDACTED] 1.25
1.25 S

Jan-27-21

DHF Review of e-mail from Mr. Rohl [REDACTED]
[REDACTED]; telephone
conference with Ms. Lambert; [REDACTED]
[REDACTED]

[REDACTED]
1.00
0.50 S

[REDACTED] telephone
conference with NJF regarding Reply Brief;
telephone conference with PJM regarding
Reply Brief; e-mail to Ms. Lambert and Mr.
Rohl regarding additional time for Reply



Brief; [REDACTED], review of Order Granting Leave to File Excess Pages; evening e-mail exchange with Ms. Lambert.

NJF	Review of Order Granting Motion for Leave to File Excess Pages In Support of Reply Regarding Motion for Rule 11 Sanctions (King); telephone conference with Ms. Junttila regarding request to file supplemental brief; telephone conference with DHF regarding same; review and revision of Reply In Support of Motion for Section 1927 Sanctions.	0.75 S
JLM	Preparation of stipulation for extension to file reply brief in King v Whitmer.	0.25 S
GRG	Research regarding plaintiff's social media posts; email to DHF and NJF regarding same; review of court filings.	1.50 S
PJM	Preparation of draft Reply Brief In Support of Motion to Dismiss and Motion for Sec. 1927 sanctions.	3.50 S
Jan-28-21 DHF	[REDACTED] [REDACTED] [REDACTED], review of stipulated order extending time for Reply in King v Whitmer; review of e-mail messages from GRG and from Mr. Eldridge regarding Judge Kenny's schedule; review of State Defendants' Motion for Sanctions in King v Whitmer; review of revised draft Reply for Rule 11 motion; telephone conference with PJM.	[REDACTED] 0.75 S
NJF	Review and revision of Stipulation Regarding Deadline for Reply In Support of Motion for Sanctions (King); email to Ms. Junttila regarding same; telephone conference with DHF regarding same; [REDACTED] [REDACTED] [REDACTED]	[REDACTED] 0.25 S

GRG

[REDACTED]

[REDACTED]

PJM Preparation of and editing of draft Reply
Brief In Support of Motion to Dismiss and
Motion for Sec. 1927 sanctions.

5.50 S

Jan-29-21

DHF

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Fink Bressack
 King v Whitmer Time Detail
 02/01/2021 through 02/28/2021

Professional Services

Hours

Feb-01-21	DHF	[REDACTED]	[REDACTED]
		[REDACTED]	0.50 S
		[REDACTED] review and revision of draft Reply Brief on sanctions motion.	
Feb-02-21	DHF	Review of State Defendants' Motion for Sanctions; review and revision of Reply Brief on sanctions; telephone conference with NJF regarding same.	4.00 S
	NJF	Review and revision of Reply In Support of Motion for 1927 Sanctions (King); email exchange with PJM regarding same; telephone conference with DHF regarding same, [REDACTED] [REDACTED]	0.50 S
	GRG	[REDACTED]	[REDACTED]

	PJM	Research regarding Reply Brief for Motion to Dismiss and Motion for Section 1927 sanctions; review of Plaintiffs' Response to City's Motion for Sanctions.	0.75 S
Feb-03-21	DHF	Continued preparation of Reply Brief regarding sanctions; [REDACTED] [REDACTED] review of US Supreme Court notice that petition for cert in King v Whitmer is being "distributed for conference"; e-mail exchange regarding significance of SCOTUS notice, suggesting Plaintiffs have not withdrawn their Cert Petition.	[REDACTED] 1.00 S 0.50 A
	NJF	Review of Notice of Distribution for Conference Regarding Cert Petition (King); email exchange with DHF and GRG regarding same.	0.25 A
	GRG	Research regarding Reply Brief In Support of Motion to Dismiss and Award of Sanctions (King v Whitmer); telephone conference with DHF regarding same; emails to DHF and NJF regarding same; research regarding SCOTUS filing in King v Whitmer.	[REDACTED] 2.00 S 0.50 A
	PJM	Preparation of responses to Plaintiffs' arguments presented in Response; research regarding same; telephone conference with DHF and NJF regarding same; email exchange with DHF regarding same.	7.50 S
Feb-04-21	DHF	Review and revision of Reply Brief regarding sanctions; review of cases cited; [REDACTED] [REDACTED] telephone conference with Ms. Meingast; late night e-mail exchange with Ms. Junttila regarding concurrence in supplemental response; telephone conferences with NJF regarding final preparation and filing of Reply Brief.	[REDACTED] 6.50 S








	NJF	Review and revision of Reply In Support of Motion for Section 1927 Sanctions (King); telephone conference with DHF regarding same; final preparation and filing of same; preparation of Ex Parte Motion for Additional Pages Regarding Reply In Support of Motion to Dismiss and for Sanctions; final preparation and filing of same.	2.50 S
Feb-05-21	DHF	<p>[REDACTED]</p> <p>[REDACTED] review of Motion for Leave to File Supplemental Brief and attachments; telephone conference with NJF regarding Motion for Leave; [REDACTED]</p> <p>[REDACTED], review of Order Granting Motion for Leave to File Additional Pages In Support of Reply In Support of Motion to Dismiss and for an Award of Sanctions.</p>	0.75 S
	NJF	Review of Order Granting Motion for Leave to File Additional Pages In Support of Reply In Support of Motion to Dismiss and for an Award of Sanctions (King); review of Plaintiffs' Motion for Leave to File Supplemental Brief in Opposition to the City's Motion for Sanctions; telephone conference with DHF regarding same; review of Robert Davis's Response to Plaintiffs' Motion to Dismiss.	1.25 S
	GRG	Review of Plaintiffs' Motion for Leave to File Supplemental Opposition to COD Motion for Sanctions; telephone conference with NJF regarding same.	0.25 S
Feb-06-21	GRG	Research regarding attorney public statements for Reply regarding sanctions motion.	1.00 S
Feb-08-21	DHF	<p>[REDACTED] review of Telegram messages posted by Sidney Powell and Lin Wood; telephone conference with NJF regarding Order Granting Plaintiffs' Motion for Leave to File Supplemental Brief; review of order.</p>	0.50 S



	NJF	Review of Order Granting Plaintiffs' Motion for Leave to File Supplemental Brief (King); telephone conference with DHF regarding same.	0.25 S
	GRG	Research regarding attorney public statements for Reply regarding sanctions motion; review of Plaintiffs' Supplemental Brief in Opposition to COD's Motion for Sanctions; research regarding same.	3.50 S
Feb-09-21	NJF	Telephone conference with GRG regarding Plaintiffs' Supplemental Brief in Opposition to COD's Motion for Sanctions.	0.25 S
	GRG	Research regarding responding to Plaintiffs' Supplemental Brief in Opposition to COD's Motion for Sanctions; telephone conference with NJF regarding same.	1.00 S
Feb-11-21	DHF	[REDACTED]	[REDACTED]
Feb-12-21	DHF	Telephone conference with NJF regarding Plaintiffs' Response to Governor Whitmer and Secretary Benson's Motion for Sanctions; review of same.	0.50 S
	NJF	Review of Plaintiffs' Response to Governor Whitmer and Secretary Benson's Motion for Sanctions; telephone conference with DHF regarding same; telephone conference with GRG regarding same.	1.00 S
	GRG	Review of Plaintiffs' Opposition to State Defendants' Motion for Sanctions; research regarding responding to arguments in same; telephone conference with NJF regarding same.	2.00 S
Feb-15-21	DHF	[REDACTED] telephone conference with GRG regarding sanctions motion.	0.25 S
	GRG	Research regarding COD Sanctions Motion; telephone conference with DHF regarding same.	2.50 S
Feb-16-21	DHF	Review of email from GRG regarding sanctions research.	0.25 S



	NJF		
	GRG	Research regarding Sanctions Motion; email to DHF and NJF regarding same.	3.00 S
Feb-17-21	GRG	Research regarding Sanctions Motions.	1.50 S
Feb-22-21	DHF	Review of online report of SCOTUS denial of cert petition; review of Telegram posting by Sidney Powell, claiming case still alive as of February 4th; e-mail to clients and others regarding SCOTUS ruling; telephone conference with NJF regarding same; 	 0.75 A 0.25 S
			
	NJF	Review of Order Denying Petition for Writ of Cert (King); telephone conference with DHF regarding same; email exchange with DHF regarding same.	0.25 S
Feb-24-21	DHF	Review of e-mail exchange between Ms. Meingast and Ms. Lambert regarding extension for Reply; review of proposed stipulation.	0.25 S
Feb-25-21	DHF	Review of Stipulated Order Extending Time for Benson and Whitmer to Reply to Response Regarding Sanctions.	0.25 S

Fink Bressack
 King v Whitmer Time Detail
 03/01/2021 through 03/30/2021

Professional Services

Hours

Mar-04-21	DHF	[REDACTED]	[REDACTED]
	NJF	[REDACTED]	[REDACTED]
Mar-10-21	DHF	[REDACTED]	[REDACTED]
	NJF	[REDACTED]	[REDACTED]
	DAB	[REDACTED]	[REDACTED]
Mar-11-21	DHF	Review of Reply Brief by State Defendants in King v Whitmer; review of cases cited.	1.00

	NJF	Review of Defendants Whitmer and Benson's Reply In Support of Motion for Sanctions (King); [REDACTED]	[REDACTED]
	DAB	[REDACTED]	[REDACTED]
Mar-12-21	DAB	[REDACTED]	[REDACTED]
Mar-15-21	DHF	[REDACTED]	[REDACTED]
	NJF	[REDACTED]	[REDACTED]
	DAB	[REDACTED]	[REDACTED]
Mar-16-21	DHF	[REDACTED]	[REDACTED]
	NJF	[REDACTED]	[REDACTED]
Mar-30-21	DHF	[REDACTED]	[REDACTED]

Fink Bressack
 King v Whitmer Time Detail
 04/01/2021 through 04/30/2021

Professional Services			<u>Hours</u>
Apr-05-21	DHF	[REDACTED]	0.25 S
Apr-06-21	DHF	Telephone conference with NJF regarding Whitmer and Benson's Motion for Leave to File Supplemental Brief.	0.25 S
	NJF	Review of Governor Whitmer and Secretary Benson's Motion for Leave to File Supplemental Brief; email to DHF regarding same.	0.75 S
Apr-09-21	DHF	Review of Text only order granting time for Response to Supplemental Brief; review of amended order.	0.25 S
	NJF	Review of Text-Only Order Granting Governor Whitmer and Secretary Benson's Motion for Leave to File Supplemental Brief; review of Amended Order regarding same.	0.25 S

Apr-22-21	DHF	Review of Text-only orders regarding Supplemental Briefing; review of Defendants Whitmer and Benson's Supplemental Brief and assessment of appropriate filing to concur in briefing; e-mail to NJF; telephone conference with GRG regarding remaining deadlines; text exchange with client.	1.25	S
	NJF	Review of email from DHF regarding addressing supplemental briefing.	0.25	S
	GRG	Telephone conference with DHF regarding case deadlines.	0.25	S
Apr-23-21	DHF	Review of sanction briefs; review and revision of draft Concurrence in Supplemental Brief of Whitmer and Benson; telephone conference with NJF regarding filing procedure.	1.00	S
	NJF	Review and revision of Concurrence With Defendants Whitmer and Benson's Supplemental Brief in support of Motion for Sanctions; final preparation and filing of same; review of Plaintiffs' Response to Defendants Whitmer and Benson's Supplemental Brief in support of Motion for Sanctions; telephone conference with DHF regarding same.	0.75	S
Apr-24-21	DHF	Review of Plaintiffs' Response to Supplemental Brief; review of related e-mail message.	0.50	S
Apr-25-21	DHF	Telephone conference with NJF regarding Plaintiffs' Response to Supplemental Brief.	0.25	S
	NJF	Telephone conference with DHF regarding Plaintiffs' Response to Whitmer and Benson's Supplemental Brief in support of Motion for Sanctions.	N/C	S

[REDACTED]

[REDACTED]

[REDACTED]



Fink Bressack
 King v Whitmer Time Detail
 05/01/2021 through 05/31/2021

Professional Services

Hours

May-10-21	DHF	Telephone conference with NJF regarding Supplemental Brief; review of Lin Wood statements and review of representations by Plaintiffs regarding non-involvement of Lin Wood.	1.25	S
	NJF	Research regarding potential Supplemental Brief In Support of Motion for Sanctions; telephone conference with DHF regarding same; telephone conference with DAB regarding same; preparation of Motion for Leave to File Supplemental Brief.	1.00	S
	DAB	Telephone conference with NJF regarding supplemental brief issue; research regarding same.	5.00	S
May-11-21	DHF	Review of Delaware filings by Lin Wood; review of sanctions briefs; review and revision of draft Motion for Leave to File Supplemental Brief; telephone conferences with NJF regarding Supplemental Brief; e-mail to Mr. Garcia.	2.75	S

NJF Preparation of Motion for Leave to File Supplemental Brief; telephone conference with DHF regarding same; final preparation and filing of same. 0.50 S

May-17-21

DHF

NJF

May-20-21

DHF

GRG

E-mail exchange with Ms. Gurewitz; review of Washington Post article regarding Ms. Junttila's public statements; e-mail exchange with GRG regarding Ms. Junttila's statement to Cheboygan Commissioners.

Research regarding Ms. Junttila's statements at Cheboygan County Board of Commissioners meeting; e-mail exchange with DHF regarding same.

0.75 S

0.50 S



Fink Bressack
 King v Whitmer Time Detail
 06/01/2021 through 06/23/2021

Professional Services

Hours

Jun-08-21	DHF	Review of Notice of Hearing related to sanctions motions before Judge Parker; transmittal to client; telephone conference with NJF regarding same.	0.25	S
	NJF	Review of Notice of Hearing Regarding Motions for Sanctions; telephone conference with DHF regarding same.	0.25	S
Jun-10-21	DHF	Email exchange with Ms. Meingast and Mr. Paterson regarding hearing schedule.	0.25	S
Jun-17-21	DHF	Review of Order requiring all Plaintiffs' counsel to be present for July 6, 2021 hearing; text exchange and telephone conference with NJF; telephone conference with Ms. Gurewitz; review of briefs and analysis of issues for hearing and additional necessary investigation.	2.00	S

	NJF	Review of Order Regarding Plaintiffs' Counsel's Required Appearance at Sanctions Hearing; telephone conference with DHF regarding same. [REDACTED] telephone conference with GRG regarding same.	[REDACTED] 0.25 S
	GRG	Telephone conference with NJF regarding Judge's 6.17.21 Order regarding sanctions motion hearing.	0.25 S
Jun-18-21	DHF	Review of e-mail messages; telephone conference with NJF regarding preparation for hearing; telephone conference with GRG regarding preparation for hearing; e-mail to NJF and GRG regarding hearing preparation; [REDACTED] e-mail to client.	[REDACTED] 1.00 S
	NJF	Telephone conference with DHF regarding preparation for hearing regarding Motion for Sanctions; review of email from DHF regarding same.	0.25 S
	GRG	Telephone conference with DHF regarding hearing regarding sanctions motion; review of email from DHF regarding same; research regarding preparation for hearing regarding sanctions motion.	0.50 S
Jun-21-21	DHF	Review of e-mail from Ms. Junttila regarding scheduling conflict; review of prior e-mail messages regarding hearing date; review of Notice of Hearing on Motion to Dismiss; telephone conference with Ms. Meingast; review of e-mail from Ms. Meingast; telephone conference with NJF regarding same; preparation for oral argument on sanctions motions (review of briefs).	2.50 S
	NJF	Review of email from Ms. Junttila regarding request to reschedule hearing regarding Motion for Sanctions; review of email from DHF regarding same; telephone conference with DHF regarding same.	0.25 S
	GRG	Assistance with preparation for hearing regarding sanctions motions; research regarding same; drafting of emails to DHF regarding same.	3.50 S



Jun-22-21	DHF	Preparation for July 6th oral argument on sanctions motions; review of additional factual information to present to court; e-mail exchange with GRG and review of additional out of court statements of opposing counsel.	3.50	S
	GRG	Assistance with preparation for hearing regarding sanctions motions; research regarding same; emails to DHF regarding same; e-mail exchanges with DHF regarding same.	2.50	S
Jun-23-21	DHF	Review of Davis Emergency Motion regarding State Senate report; review of State Senate Report.	1.75	S
	NJF	[REDACTED]		
	GRG	Review of MI Senate's 2/23/21 Report on Election; research regarding Hearing on Motions for Sanctions.	1.00	S




Fink Bressack
 King v Whitmer Time Detail
 06/24/2021 through 08/31/2021

Professional Services

Hours


Jun-24-21	DHF	[REDACTED]	[REDACTED]
	NJF	Telephone conference with DHF regarding preparation for hearing regarding Motion for Sanctions; telephone conference with DAB regarding same; review of media reports regarding same.	0.25 S
	DAB	Telephone conference with NJF regarding Michigan Senate Election Report; review of file; review of Michigan Senate Election Report.	[REDACTED] 3.00 S
Jun-25-21	DAB	Review of MI Senate election report; preparation of memo regarding MI Senate election report; research regarding documents filed in Rudy Giuliani discipline action.	2.00 S

Jun-28-21	DHF	Review of e-mail from Mr. Paterson to Ms. Junttila; review of Motion to Adjourn; text exchange with Ms. Gurewitz; telephone conference with NJF regarding request for adjournment; telephone conference with Mr. Garcia.	1.00 S
	NJF	Review of Plaintiffs' Motion to Adjourn Sanctions Hearing; review of Plaintiffs' Amended Motion to Adjourn Sanctions Hearing; email exchange with DHF regarding same; telephone conference with DHF regarding same.	0.25 S
Jun-29-21	DHF	Preparation for oral argument on sanctions motions; telephone conference with NJF; conference call with NJF and DAB.	2.25 S
	NJF	Telephone conference with DHF and DAB regarding preparation for hearing regarding sanctions motions.	0.25 S
	DAB	Telephone conference with DHF and NJF regarding research regarding plaintiffs' counsel statements and representation in preparation for sanctions hearing; review of file; preparation of memo regarding confirmed and potential misrepresentations made by Plaintiffs' counsel.	 3.50 S
Jun-30-21	DHF	Office conference with DAB regarding preparation for oral argument; telephone conference with NJF regarding preparation for oral argument; review of Supplemental Briefs; review of briefs regarding oral argument schedule; review of Court Order adjourning hearing; telephone conference with Judge Parker's Case Manager; e-mail to counsel regarding schedule; preparation for oral argument; review of Notices of Appearance by Donald Campbell for representation of multiple attorneys (Hagerstrom, Haller, Johnson, Rohl, Wood, Kleinhendler, Powell,); review of Notices of Appearance by Patrick McClinn for each attorney represented by Mr. Campbell; review of e-mail messages from Ms. Meingast, Ms. Lambert, Mr. Eldridge and Mr. Campbell regarding oral argument schedule; review of e-mail from Case	3.50 S



Manager regarding Court limitations on rescheduling of oral argument; evening e-mail exchange with all counsel (except Meingast) regarding oral argument; e-mail exchange with Ms. Meingast.

NJF Review of Appearances filed by Mr. Campbell on behalf of Plaintiffs' counsel; telephone conference with DHF regarding same; email to client regarding same; review of Order Granting Motion to Adjourn Hearing; review of emails regarding same. 0.25 S


DAB Office conference with DHF regarding review of representations made by Plaintiffs' counsel in sanctions briefing; review of file; continued review of briefing regarding same; preparation of memo regarding same.  2.00 S

GRG Research regarding sanctions Motions; review of attorney appearances regarding same; telephone conference with DAB regarding case. 1.50 S




Jul-01-21 DHF E-mail exchange with Judge Parker's Case Manager regarding oral argument; review and approval of draft stipulation regarding hearing schedule; review of e-mail messages from NJF, Mr. Campbell, Mr. Paterson, Ms. Meingast and Ms. Gurewitz; telephone conference with NJF regarding stipulation. 1.00 S

NJF Review of email from Case Manager regarding hearing date for Motions for Sanctions; preparation of Stipulated Order regarding same; email to all counsel regarding same; telephone conference with DHF regarding same. 0.25 S

Jul-02-21 DHF Office conference with DAB regarding preparation for oral argument; review of e-mail messages regarding draft stipulation to reschedule oral argument; preparation for oral argument. 1.00 S

DAB Office conference with DHF regarding preparation for sanctions hearing; telephone conference with DHF regarding preparation for sanctions hearing; review of file regarding representations made to the Court by Plaintiffs' counsel; preparation of memo  2.00 S



		regarding same; assisting DHF regarding preparation for sanctions hearing.	
	GRG	Assistance with preparation for Sanctions Motion; telephone conference and e-mail exchange with DAB regarding same.	0.75 S
Jul-05-21	DAB	Research regarding Rule 11 sanctions issues; preparation of memo regarding representations made by Plaintiffs' counsel and other issues regarding sanctions hearing.	 1.50 S
Jul-06-21	DHF	Preparation for oral argument; review and response to e-mail from Mr. McGlinn regarding non-appearance of his clients at sanctions hearing; e-mail to client.	1.50 S
	DAB	Office conference with DHF regarding preparation for sanctions hearing; research regarding Rule 11 sanctions issues; preparation of memo regarding representations made by Plaintiffs' counsel and other sanctions issues.	 2.00 S
Jul-07-21	DHF	Preparation for oral argument; telephone conference with Ms. Gurewitz; review of Rule 11 letter; e-mail to Ms. Gurewitz; review of Ex Parte Motion for Leave to Appear by Counsel; review of Order denying Motion to Appear Via Counsel; review of e-mail from Case Manager regarding zoom and YouTube link; review of amended order, as submitted to Court.	3.25 S
	NJF	Telephone conference with DHF regarding preparation for hearing regarding Motions for Sanctions; review of Ex Parte Motion for Leave to Appear Through Counsel; review of Text-Only Order Denying same; review of email from Case Manager regarding revised Stipulated Order; preparation of same; submission of same; email to all counsel regarding same; review of Plaintiffs' Response to Intervenor-Defendant Davis's Request for the Court to Take Judicial Notice.	1.00 S
	DAB	Research regarding Rule 11 sanctions issues; preparation of memo regarding issues for sanctions hearing.	 2.00 S



Jul-08-21	DHF	Preparation for oral argument; review of Notice of Hearing; [REDACTED], review of information regarding attorneys representing ex-President Trump in social media lawsuits.	[REDACTED] 4.00 S
	NJF	Review of Notice of Hearing Regarding Motion for Sanctions; telephone conference with DHF regarding same; review of Notice of Appearance of Mr. Buchanan on behalf of Emily Newman.	0.25 S
	DAB	Office conference with DHF regarding preparation for sanctions hearing; research regarding same.	0.75 S
	GRG	Telephone conference with DHF regarding Sanctions Motion Hearing.	0.25 S
Jul-09-21	DHF	Preparation for oral argument; [REDACTED] office conference with DAB and telephone conference with NJF regarding oral argument.	[REDACTED] 2.50 S
	NJF	[REDACTED]	[REDACTED]
	DAB	Office conference with DHF regarding issues for King sanctions hearing; preparation of memo regarding sanctions hearing issues; preparation of outline of sanctions hearing argument.	[REDACTED] 3.50 S
	GRG	Assistance with preparation for Sanctions Hearing; drafting of memo regarding same; multiple office conferences and e-mail exchanges with DHF and DAB.	[REDACTED] 3.00 S
Jul-10-21	DHF	Preparation for oral argument on sanctions motions; review of all briefs.	3.50 S
Jul-11-21	DHF	Preparation for oral argument.	6.00 S
	NJF	Assisting DHF with preparation for hearing regarding motions for sanctions; telephone conferences with DHF regarding same; review of all briefs regarding same; research regarding same; email exchange with DHF	2.00 S






regarding same.

	DAB	Preparation for sanctions hearing.	1.00 S
Jul-12-21	DHF	Final preparation for oral argument on sanctions motions; appearance for [REDACTED] hearing before Judge Parker; [REDACTED] [REDACTED] telephone conference with Mr. Garcia; telephone conference with Ms. Gurewitz; review of notes for supplemental briefing; office conference with NJF regarding same.	[REDACTED] 6.00 S
	NJF	Assistance with DHF's preparation for hearing regarding Motions for Sanctions; attendance at Zoom hearing regarding Motions for Sanctions; office conference with DHF regarding same; review of Order Regarding Supplemental Briefing; office conference with DHF regarding same.	4.50 S
	DAB	Observation of sanctions hearing to assist with legal issues.	[REDACTED] N/C
	GRG	Assistance with preparation for Sanctions Hearings; observation of Sanctions Hearing; multiple e-mail exchanges and office conferences with DHF, NJF and DAB regarding same.	[REDACTED] N/C
Jul-13-21	DHF	[REDACTED] [REDACTED] review of Motion for Order to Show Cause, filed by Mr. Davis; [REDACTED] [REDACTED]	[REDACTED] 0.25 S
	DAB	Telephone conference with DHF regarding supplemental sanctions brief; telephone conference with GRG regarding same; research regarding same; preparation of memo regarding same.	[REDACTED] 4.00 S
	GRG	Research regarding supplemental briefing for Sanctions Motions; e-mail exchanges with DHF and DAB regarding same.	1.50 S





Jul-14-21	DHF	Review of e-mail exchange with court reporter; review of transcript of Monday's proceedings; [REDACTED] review of issues for Supplemental Brief.	[REDACTED] 1.75 S
	NJF	Review of Plaintiffs' Counsel's Emergency Motion to Release Video from Sanctions Hearing; telephone conference with DHF regarding same; review of Opinion and Order Denying same.	0.25 S
	DAB	Research regarding issues regarding supplemental brief; review of hearing transcript regarding same; preparation of memo regarding same.	[REDACTED] 3.50 S
	GRG	Research regarding supplemental briefing for Sanctions Motions; e-mail exchanges with DHF and DAB regarding same; telephone conference with DAB regarding same.	1.75 S
Jul-15-21	DHF	Review of Order to Show Cause; review of scheduling notice regarding Show Cause; review of stipulation and order regarding substitution of counsel for Ms. Newman; review of Ms. Junttila's appearance on OAN; review of transcript and preparation of outline of additional issues for Supplemental Brief.	3.50 S
	NJF	Review of Stipulation and Order of Substitution of Counsel for Emily Newman; telephone conference with DHF regarding same.	0.25 S
	DAB	Review of hearing transcript to identify statements relevant to supplemental brief; research regarding issues for supplemental brief; preparation of memo regarding same; telephone conference with GRG regarding post-hearing statements of Plaintiffs' attorneys.	[REDACTED] 2.75 S
	GRG	Research regarding supplemental briefing for Sanctions Hearing; telephone conference with DAB regarding same; emails to DAB regarding same.	1.00 S




Jul-16-21	DHF	Preparation of Supplemental Brief; conference call with potential witness with video and audio evidence; review of transcript; conference call with DAB and GRG regarding Supplemental Brief.	3.00 S
	DAB	Review of hearing transcript; research regarding cases cited by Plaintiffs during hearing; telephone conference with DHF and GRG regarding potential supplemental brief issues; preparation of memo regarding issues for supplemental brief; preparation of outline of supplemental brief; telephone conference with GRG regarding factual issues relevant to supplemental brief.	 4.00 S
	GRG	Research regarding supplemental briefing for Sanctions Hearing; telephone conference with DHF and DAB regarding same.	1.00 S
Jul-19-21	DHF	Office conference with GRG and review of recent Telegram postings by Lin Wood referring to DHF; review of media reports regarding sanctions; office conference with DAB regarding draft Supplemental Brief; review of exhibits for Supplemental Brief; online research regarding opposing counsel; review of stipulated substitution of counsel for Lin Wood.	2.25 S
	NJF	Telephone conference with DHF and DAB regarding Supplemental Brief Regarding Sanctions.	0.25 S
	DAB	Office conference with DHF regarding preparation of supplemental brief; preparation of supplemental brief.	 3.25 S
	GRG	Research regarding supplemental briefing for Sanctions Hearing; office conference with DHF and DAB regarding same.	1.00 S
Jul-20-21	DAB	Office conference with DHF regarding preparation of supplemental brief; preparation of supplemental brief; research regarding same.	 2.50 S
	GRG	Telephone conference with DAB regarding Supplemental Briefing for Sanctions Hearing; research regarding same.	0.50 S



Jul-21-21	DHF	Review and revision of Supplemental Brief.	2.50 S
	NJF	Telephone conference with DHF regarding Supplemental Brief Regarding Sanctions.	0.25 S
	DAB	Legal research regarding supplemental brief; office conference with DHF regarding preparation of supplemental sanctions brief; review of Plaintiffs' prior filings regarding same.	 3.00 S
	GRG	Review of draft of Supplemental Brief for sanctions hearing; telephone conference with DAB regarding same.	0.50 S
Jul-22-21	DHF	Review and revision of draft Supplemental Brief; e-mail to NJF and DAB; review of New York transcript of hearing regarding Lin Wood's Pro Hac Vice status; review of transcript of hearing.	2.50 S
	NJF	Telephone conference with DHF regarding Supplemental Brief Regarding Sanctions; review and revision of same; telephone conference with DAB regarding same; research regarding same.	0.25 S
	DAB	Preparation of memo regarding issues to address in supplemental brief; research regarding Lin Wood's involvement in New York defamation case and related PHV issues; review of DHF's edits to supplemental brief; preparation of exhibit regarding same.	 2.50 S
Jul-23-21	NJF	Review of Mr. Wood's Response to Order to Show Cause; review and revision of Supplemental Brief Regarding Sanctions.	1.00 S
	DAB	Review of Lin Wood response to show cause order; telephone conferences with NJF regarding preparation of supplemental brief; telephone conference with GRG regarding preparation of supplemental brief; review of Plaintiffs' counsel's social media posts.	2.50 S
	GRG	Telephone conference with DAB regarding Supplemental Briefing for Sanctions Motion.	0.25 S



Jul-25-21	NJF	Review and revision of Supplemental Brief Regarding Sanctions; telephone conference with DHF regarding same.	1.00 S
	DAB	Review and revision of supplemental brief.	1.00 S
Jul-26-21	DHF	Review and response to e-mail messages from Ms. Lambert Junttila and other counsel; telephone conference with Ms. Lambert Junttila; conference call with Case Manager and Ms. Lambert Junttila; review and revision of draft Supplemental Brief; telephone conferences with DAB and with NJF regarding Supplemental Brief; review of e-mail from Case Manager regarding stipulated order; evening telephone conference with Ms. Lambert Junttila; email exchange with Mr. Campbell regarding Ms. Lambert Junttila's failure to include him in e-mail notification (despite talking to him and obtaining consent).	2.50 S
	NJF	Review and revision of Supplemental Brief Regarding Sanctions; telephone conference with DHF regarding same; telephone conference with DAB regarding same.	1.25 S
	DAB	Office conferences with DHF regarding supplemental sanctions brief; review and revision of supplemental brief; telephone conference with GRG regarding exhibits for supplemental brief; review of hearing transcript and related briefing regarding issues relevant to preparation of supplemental brief.	 2.50 S
	GRG	Telephone conference with DAB regarding Supplemental Briefing for Sanctions Motion; review of Supplemental briefs filed by Plaintiffs' attorneys.	1.00 S
Jul-27-21	DHF	Telephone conference with NJF regarding Motion for Extension; review of Motion for Extension and Order Granting Extension; review of related e-mail messages; review and revision of draft Supplemental Brief; review of exhibits.	2.00 S



	NJF	Review and revision of Supplemental Brief Regarding Sanctions; preparation of Emergency Motion to Extend Deadline for Filing Supplemental Briefs; email to all counsel regarding same; telephone conference with DHF regarding same; telephone conference with DAB regarding same; final preparation and filing of same; review of Text-Only Order granting same.	2.00 S
	DAB	Preparation of draft Affidavit of KSH to attach to supplemental brief; telephone conferences with NJF regarding preparation of supplemental brief; preparation of supplemental brief; preparation of exhibits for supplemental brief; [REDACTED]	[REDACTED] 3.00 S
	GRG	Office conference with DAB regarding Supplemental Briefing for Sanctions Motion; emails to DAB regarding same.	0.75 S
Jul-28-21	DHF	Review and revision of draft Supplemental Brief; office conferences with KSH and DAB regarding affidavit of service; review of revised draft Affidavit;	5.25 S
	NJF	Review and revision of Supplemental Brief Regarding Sanctions; telephone conference with DHF regarding same; telephone conference with DAB regarding same; final preparation and filing of same.	4.00 S
	DAB	Review of Lin Wood supplemental brief; review of Sidney Powell et al supplemental brief; research regarding issues raised in supplemental briefs; [REDACTED] office conferences with DHF regarding preparation of supplemental brief; telephone conferences with NJF regarding preparation of supplemental brief; preparation of exhibits for supplemental brief, preparation of supplemental brief.	[REDACTED] 4.00 S
	KSH	Office conference with DHF regarding affidavit of service.	[REDACTED] N/C



Jul-29-21	DHF	Review of Supplemental Briefs filed by Powell, Junttila and Campbell; [REDACTED]	[REDACTED] S 2.00
	DAB	Review of Plaintiffs' counsels' supplemental briefs; legal research regarding issues raised in supplemental briefs, preparation of memo regarding responses to supplemental briefs; office conference with DHF and NJF regarding preparation of responses to supplemental briefs.	[REDACTED] S 4.00
Aug-02-21	DHF	Review of briefs; preparation of Response Brief.	4.00 S
	DAB	Preparation of brief in response to supplemental briefs filed by Plaintiffs' counsel.	[REDACTED] S 3.75
Aug-03-21	DHF	Review of Supplemental Briefs; telephone conference with DAB regarding Response Brief issues; office conference with DAB regarding Response Brief issues; telephone conference with NJF regarding Response Brief.	5.50 S
	NJF	Telephone conference with DHF regarding response to supplemental briefs regarding sanctions.	0.25 S
	DAB	Research regarding issues raised in supplemental briefs; telephone conference with DHF regarding issues raised in supplemental briefs; preparation of response to Plaintiffs' counsels' supplemental briefs; research regarding same.	[REDACTED] S 3.50
Aug-04-21	DHF	Review and revision of Response Brief; review of Order Granting Sanctions, entered by Magistrate Judge Neureiter in Colorado US District Court Dominion litigation.	5.00 S
	NJF	Review and revision of Response Brief; final preparation and filing of same.	0.25 S
	DAB	Preparation of response to Plaintiffs' counsels' supplemental briefs; office conferences with DHF regarding same; telephone conferences with DHF and NJF regarding preparation of response to	[REDACTED] S 2.25



supplemental briefs; preparation of exhibit
for response to supplemental briefs.

Aug-05-21	DHF	Review and response to media inquiries; review of Response Briefs filed by Plaintiffs' counsel.	2.00 S
	NJF	Review of Plaintiffs' counsel's Responses to Supplemental Briefs; telephone conference with DHF regarding same.	0.25 S
	DAB	Review of Plaintiffs' responses to the City's supplemental brief.	0.50 S
Aug-25-21	DHF	Review of Opinion and Order; response to e-mail messages [REDACTED]	[REDACTED] 1.50 S
	NJF	Review of Opinion and Order Regarding Sanctions; telephone conference with DHF regarding same.	0.25 S



Timekeeper	Category	Hours	Rate	Total	Total (Reduced by 10%)
DHF	D	38.5	325	12512.5	11261.25
DHF	A	31.5	325	10237.5	9213.75
DHF	S	156.25	325	50781.25	45703.125
DGB	D	50.75	325	16493.75	14844.375
DGB	A	40.25	325	13081.25	11773.125
DGB	S	66	325	21450	19305
JLM	D	7	225	1575	1417.5
JLM	A	1	225	225	202.5
JLM	S	3.75	225	843.75	759.375
NJF	D	21.25	325	6906.25	6215.625
NJF	A	4.25	325	1381.25	1243.125
NJF	S	41	325	13325	11992.5
GRG	D	30.5	225	6862.5	6176.25
GRG	A	18	225	4050	3645
GRG	S	99	225	22275	20047.5
PJM	D	1.25	75	93.75	84.375
PJM	S	42.5	75	3187.5	2868.75
DAB	S	76.25	225	17156.25	15440.625
				Category Totals	
				Defense in Trial Court (D)	39999.375
				Appeal (A)	26077.5
				Sanctions Proceedings (S)	116116.875