OF COUNSEL
LEWIS DICKSON
CATHERINE BAEN
MARK WHITE III
CRAIG ANTHONY WASHINGTON
LIZ ROGERS, ALPINE
SHANE O'NEAL, ALPINE

Attention:

Re:

DECUERIN & DICKSON

ATTORNEYS AT LAW

SEVENTH FLOOR, THE REPUBLIC BUILDING

HOUSTON, TEXAS 77002

June 30, 2023

RECEIVED

NOV 2 8 2023

ACCOUNTING HOUSE OF REPRESENTATIVES

State Representative Andrew Murr

Logan Harrison, Chief of Staff

Logari ramson, Offici of Stan

Dick DeGuerin - Submission of Time Sheets

Impeachment and Trial of Warren Kenneth Paxton, Attorney General of the State

of Texas

FOR PROFESSIONAL SERVICES RENDERED FROM May 28, 2023 through June 30, 2023

May 28, 2023	Sunday	Review impeachment Articles. Telephone conference with House Manager x2 and co-counsel x2. Review and sign contract.	2.00
May 29, 2023	Monday	Review Articles of Impeachment, Texas Constitution; set up files. Text House Manager; talk to co-counsel, investigator; get phone numbers.	1.00
May 30, 2023	Tuesday	Reading Paxton materials. Team meeting in co-counsel's office.	4.00
May 31, 2023	Wednesday	Telephone conference co-counsel; review video of presentation to House Committee; telephone conference with team; plan for press conference; telephone conference with co-counsel and House Manager.	8.00
June 1, 2023	Thursday	Travel Hou-Aus-Hou; press conference; meet with consultant, House Committee members; co-counsel.	8.00
June 2, 2023	Friday	Emails, texts, news stories. Telephone conference with reporter; multiple telephone conferences: House Manager, co-counsel; multiple media interviews.	8.00
June 3, 2023	Saturday	Emails, texts, telephone conference with attorney, co-counsel.	4.00
June 4, 2023	Sunday	Emails, texts, telephone conference with witness.	2.00

Re: Impeachment and Trial of Warren Kenneth Paxton

June 30, 2023

Page 2

June 5, 2023	Monday	Multiple articles; texts and email with team; telephone conference with lawyers for witnesses; telephone interview with reporter, KHOU interview; meet at attorney's office with co-counsel.	8.00
June 6, 2023	Tuesday	Interview with reporter; telephone conference with lawyer; interview with reporter; texts, consultant, co-counsel; set up other interviews.	4.00
June 7, 2023	Wednesday	Prepare agenda for meeting; outline trial memo; Team meeting at office of co-counsel; press interviews.	8.00
June 8, 2023	Thursday	News articles; multiple telephone conferences; co-counsel emails, texts, interviews.	8.00
June 9, 2023	Friday	Emails, texts, news articles; Nate Paul Indictment unsealed	ı;
		review emails between co-counsel and OAG re: discovery subpoena.	4.00
June 10, 2023	Saturday	Emails, texts: co-counsel; next steps.	1.00
June 11, 2023	Sunday	Emails; correspondence from Paxton lawyers re: contract with OAG.	2.00
June 12, 2023	Monday	Conference call with co-counsel and investigators; conference call with co-counsel.	1.00
June 13, 2023	Tuesday	Texts, emails; new information about Paxton money; Paxton, Senator Paxton; emails re: rules and strategy.	4.00
June 14, 2023	Wednesday	Emails, texts; Paxton criminal case to be in Harris Co.; telephone conference with attorney; Team meeting at office of co-counsel.	6.00
June 15, 2023	Thursday	Conference call with co-counsel, co-counsel memo; conference call House Manager, co-counsel re: memo; texts, emails; respond to cease and desist; response to Hilton letters; telephone conference with co-counsel.	8.00

Impeachment and Trial of Warren Kenneth Paxton Re:

June 30, 2023 Page 3

June 16, 2023 Friday	Drafting response to Hilton letters; telephone conference with co-counsel; texts, emails; meeting with reporter; emails with reporter; receive and review conflict letter; telephone conference and emails re: response: co-counsel and House Manager; final response.	8.00
June 17, 2023 Saturday	Receive and review memo from OAG General Counsel; draft response; conference call House Manager and co-counsel; texts, emails.	4.00
June 18, 2023 Sunday	Review news articles, texts, emails.	1.00
June 19, 2023 Monday	Review media, emails, texts; text House Manager re Angela Paxton.	2.00
June 20, 2023 Tuesday	Review media, texts, emails; Paxton Press Conference; telephone conference reporter; telephone conference co-counsel; review OAG reports; telephone conference reporter; review Lewis Brisbois report; monitor Senate for rules.	10.00
June 21, 2023 Wednesday	Monitor media, texts, emails; prepare for team meeting; prepare agenda; interview reporter; team meeting at office of co-counsel; monitor Senate for rules; receive and review Senate Rules.	10.00
June 22, 2023 Thursday	Review media, texts, emails; telephone conference House Manager; work on press release re Rules; study rules.	10.00
June 23, 2023 Friday	Review texts, emails, media; prepare agenda for Team meeting with House Manager; telephone conference with lawyer re Laura Olson; conference with co-counsel; review materials on assignments, witnesses.	6.00
June 24, 2023 Saturday	Review texts, emails, media; list pretrial motions from co-counsel.	2.00
June 25, 2023 Sunday	Review emails, texts, media.	1.00

Re: Impeachment and Trial of Warren Kenneth Paxton

June 30, 2023 Page 4

June 26, 2023 Monday	Review texts, emails, media; prepare agenda for Team meeting; telephone conference co-counsel; review rules; telephone conference re properties.	2.00
June 27, 2023 Tuesday	Review texts, emails, media; Team meeting at RHA.	2.00
June 28, 2023 Wednesday	Texts, emails, media; prepare for meeting with BOM.	2.00
June 29, 2023 Thursday	Travel Hou-Aus-Hou; meeting with BOM; texts, emails, m telephone conference with witness.	edia; 6.00
June 30, 2023 Friday	Texts, emails, media; plan further investigation; multiple telephone conferences.	3.00
	TOTAL HOURS DICK DeGUERIN:	160.00
OF COUNSEL MARK WHIT	E	
June 5, 2023 Monday	Review investigations committee hearing.	3.00
June 7, 2023 Wednesday	Review Paxton defense press conference; draft communication regarding a reply; attend meeting at office of co-counsel.	4.00
June 14, 2023 Wednesday	Team meeting at office of co-counsel.	2.50
June 15, 2023 Thursday	Email regarding forensic accountant selection; review emails and draft memo re: Senate rules.	1.00
June 16, 2023 Friday	Meeting at office of co-counsel; draft emails re: forensic accountant options and roles; review emails re: case and a draft memo re: proposed rules; conference call	
	on forensic accountant selection process.	3.50
June 20, 2023 Tuesday	Meet with co-counsel re forensic accountant.	2.00
June 21, 2023 Wednesday	Review Senate rules, conference with team.	1.00
	TOTAL HOURS MARK WHITE:	17.00

Re: Impeachment and Trial of Warren Kenneth Paxton June 30, 2023

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Dick DeGuerin 160 hours @ \$500.00/hr. = \$80,000.00 Mark White 17 hours @\$500.00/hr. = \$8,500.00

INVOICE TOTAL: \$88,500.00

General & Dickson), DEGUERIN & DICKSON), W



SHANE O'NEAL, ALPINE

SEVENTH FLOOR, THE REPUBLIC BUILD WILL TO THE PRESTON AVENUE

HOUSTON, TEXAS 77002

July 31, 2023

RECEÍVED

State Representative Andrew Murr

NOV 2 8 2023

Attention:

Logan Harrison, Chief of Staff

ACCOUNTING HOUSE OF REPRESENTATIVES

Re:

Dick DeGuerin - Submission of Time Sheets

Impeachment and Trial of Warren Kennth Paxton, Attorney General of the State

of Texas

FOR PROFESSIONAL SERVICES RENDERED FROM July 1, 2023 through July 31, 2023

July 1, 2023	Saturday	Texts, emails, media.	1.00
July 2, 2023	Sunday	Texts, emails, media.	1.00
July 3, 2023	Monday	Texts, emails, media; review subpoena applications; schedule interviews; review property info; TEC filings; schedule interviews.	4.00
July 4, 2023	Tuesday	Texts, emails, media; review House report on Slaton; review Articles.	3.00
July 5, 2023	Wednesday	Texts, emails, media; telephone conference with reporter; review summary of four whistleblower complaints; prepare for interviews; witness transcripts.	8.00
July 6, 2023	Thursday	Travel Houston-Austin-Houston; team meeting; interviews Witnesses.	12.00
July 7, 2023	Friday	Prepare for team meeting; interview attorney; receive and review Paxton demand for discovery; Motion to Prohibit Compelling Testimony; Paxton request for pretrial Conference; emails, texts.	3.00
July 8, 2023	Saturday	Texts, emails, media; review witness memo.	2.00

Re: Impeachment and Trial of Warren Kenneth Paxton July 31, 2023 Page 2

July 9, 2023	Sunday	Texts, emails, media; scheduled conference with BOM; prepare for conference call re: OAG waiver/witness.	2.00
July 10, 2023	Monday	Texts, emails, media; reporter telephone conference; attorney telephone conference re: witness; conference with team; review responses on disclosure; review Cammad audio re: Grand Jury subpoena; telephone conference with co-counsel.	sk 8.00
July 11, 2023	Tuesday	Texts, emails, media; review letter to Stone/Hilton and ours to Senate; telephone conference with attorney.	3.00
July 12, 2023	Wednesday	Buzbee release and suggested reply; prepare for Team meeting; Team zoom; Team conference with House Manage receive and review Discovery order.	er; 4.00
July 13, 2023	Thursday	Texts, emails, media; Hilton letter; text to co-counsel; telephocalls; conference call with Hilton and Team disclosure.	one 4.00
July 14, 2023	Friday	Texts, emails, media; conference calls x2; conference re: Protective Order and letter to Hilton; review House Resolution approve disclosure 18,000 pp.	8.00
July 15, 2023	Saturday	Texts, emails, media; draft email re: confidential documents and protective order; response from Hilton.	2.00
July 16, 2023	Sunday	Texts, emails, media; review new information from N. Paul's oppo; discovery dispute emails; set up meeting with attorney.	4.00
July 17, 2023	Monday	Texts, emails, media; meet at RH with attorney; new emails by Hilton; receive and review gag order; work on discovery response.	6.00
July 18, 2023	Tuesday	Travel Houston-Austin; telephone conference AUSA; interviews: witnesses x2; review witness materials, witness affidavit; prepare for interviews; receive Amy Hilton letter and draft reply.	8.00
July 19, 2023	Wednesday	Texts, emails, media; prepare for witness and conduct interview; prepare for and interview witness.	8.00

Re: Impeachment and Trial of Warren Kennth Paxton July 31, 2023
Page 3

July 20, 2023	Thursday	Text, emails, media; prepare for and conduct interviews Witnesses x2; prepare for but cancel interview of witness. Travel Austin-Houston.	10.00
July 21, 2023	Friday	Text, emails, media; review Webster testimony to Senate; Team conference; media calls re: Paxton Motion to DQ Democrats telephone conference House Manager, others re: reply.	6.00
July 22, 2023	Saturday	Texts, emails, media; review Webster testimony; receive and review Hotze suit for TRO.	2.00
July 23, 2023	Sunday	Texts, emails, media; team emails re: Commack, Paxton appearance before Senate Committee.	3.00
July 24, 2023	Monday	Texts, emails, media; House Manager re meeting with BOM, co-counsel re:witness; telephone call attorney; receive letter AUSA.	8.00
July 25, 2023	Tuesday	Texts, emails, media; zoom conference; conference call attorney and co-counsel; review Articles re: Ferguson and Carillo; receive and review Motion for Bill of Particulars and draft response; review texts between House Manager and witness; multiple telephone conferences.	6.00
July 26, 2023	Wednesday	Texts, emails, media; zoom conference BOM; zoom conference with Team; telephone conference with attorney; schedule interviews; review materials.	8.00
July 27, 2023	Thursday	Texts, emails, media; telephone conference with reporter; telephone conference with reporter; text Team.	2.00
July 28, 2023	Friday	Texts, emails, media; review OAG report on whistleblowers; review report by Lewis Brisbois; review objections to subpoena; review Hilton response to our Notice; investigator report.	8.00
July 29, 2023	Saturday	Texts, emails, media; travel arrangements; schedule interviews.	2.00

Re: Impeachment and Trial of Warren Kenneth Paxton July 31, 2023 Page 4

July 30, 2023	Sunday	Texts, emails, media; review OAG report; review Lewis Brisbois report.	4.00
July 31, 2023	Monday	Texts, emails, media; receive and review new Paxton pleadings; Motion to Dismiss and Forgiveness research; zoom Team.	4.00
		TOTAL HOURS DICK DEGUERIN: 1	54.00
OF COUNSEL	_ MARK WHIT	E	
July 5, 2023	Wednesday	Attend weekly Team meeting.	1.00
July 12, 2023	Wednesday	Attend weekly Team meeting; review materials to prepare for meeting with witness, and members of the team; attend meeting with witness and Team members.	4.50
July 14, 2023	Friday	Review transcript of the House Investigation Committee hearing, Senate impeachment rules, laws and constitutional provisions pertaining to impeachment and government ethics.	5.00
July 17, 2023	Monday	Review the OAG internal investigation reports (2) related to the whistleblower claims; attend meeting to interview witness and lawyer regarding the litigation giving rise to the OAG letter regarding foreclosure sales during COVID; research Kadari, Inc.; draft email with details of the Kadari, Inc. research.	4.00
July 18, 2023	Tuesday	Review the OAG internal investigation reports (2) related to the whistleblower claims and their exhibits.	4.00
July 19, 2023	Wednesday	Review the OAG internal investigation reports (2) related to the whistleblower claims; review voicemail left by potential witness and draft an email evaluation of the message for co-counsel review.	2.50
July 20, 2023	Thursday	Attend Team meeting; review the OAG internal investigation reports (2) related to the whistleblower claims and transcript of the House Investigation Committee hearing.	3.75

Re: Impeachment and Trial of Warren Kenneth Paxton

July 31, 2023

Page 5

July 22, 2023 Saturday Focused review of the allegations regarding the OAG

intervention into the Mitte Foundation lawsuit; research the TX Property Code and related materials regarding the OAG'S right to intervene; draft email to the team regarding

the research.

2.00

July 25, 2023 Tuesday Research OAG opinion letters to COVID, foreclosure, OAG

Intervention, public information requests; research cases

related to OAG intervention.

5.00

July 26, 2023 Wednesday Research the TX Property, Business Organizations,

Government, and other Codes to determine the propriety of the Mitte Foundation Intervention, the OAG opinion letter procedure, relevant government ethics rules and rules related to contract processing and document retention, and the impact of a gubernatorial disaster declaration; draft email for the Team regarding the TX Property Code and the right of the OAG to intervene in the Mitte Foundation litigation.

July 27, 2023 Thursday

Continue to research the TX Property, Business Organizations, Government and other Codes to determine the propriety of the Mitte Foundation intervention, the OAG opinion letter procedure, relevant government ethics rules and rules related to contract processing and document retention, and the impact of a Gubernatorial disaster declaration; respond to replies from the team to email regarding the TX Property Code and the right of the OAG to intervene in the Mitte Foundation litigation.

July 28, 2023 Friday

Attend Team meeting to continue to learn how to operate the DISCO discovery platform; research the TX Property, Business organizations, Government, and other Codes to determine the propriety of the Mitte Foundation intervention, the OAG Opinion letter procedure, relevant government ethics rules and rules related to contract processing and document retention, and the impact of a gubernatorial Disaster Declaration.

4.25

Re:	Impeachment and	Trial of Warren Kenneth Paxton
July 3	31, 2023	
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Page 6

July 29, 2023 Saturday	Review OAG opinion letters, case law on OAG intervention
	in lawsuite involving charitable trusts, and state laws

in lawsuits involving charitable trusts, and state law on contracting procedures, OAG opinion letter process, the hiring of outside counsel by the OAG and the appointment of "special prosecutors" or attorneys pro tem; draft email

reply to an email from co-counsel on the Mitte

Foundation intervention. 3.25

July 30, 2023 Sunday Review Texas statutes related to the OAG's retention of

contracting documents, Open Records requests,

government ethics, OAG opinions. 2.00

July 31, 2023 Monday Research government contracting statutes and state

Agency regulations to determine the propriety of contracting with B. Cammack by OAG; meet with

witness, investigator and co-counsel regarding financial analysis of Esther Blind Trust and Paxton accounts.

6.00

TOTAL HOURS FOR MARK WHITE:

59.00

Dick DeGuerin 154 hours @ \$500.00/hr. = \$77,000.00 Mark White 59 hours @500.00/hr. = \$29,500.00

FEE TOTAL: \$106,500.00

EXPENSES:

Mileage, July 7, 2023 (Hou-Austin-Hou) 320 miles x \$ 0.655 = \$209.60 Mileage, July 18, 2023 (Hou-Austin-Hou) 320 miles x \$ 0.655 = \$209.60 Parking, May 30, 2023 (Houston) (Team Meeting) - \$4.20 Parking, June 5, 2023 (Houston) (Team Meeting) - \$20.00 Parking, June 14, 2023 (Houston) (Team Meeting -) \$4.50 Mileage, July 18, 2023 (Hou-Aus) 160 miles x \$ 0.655 = \$104.80 Hotel, July 18-20, 2023 (Austin, TX) (Interviews) - \$455.06 Hotel , July 19, 2023 (Austin, TX) (Interviews) (Meal) - \$33.15 July 19, 2023, (Austin, TX) (Interviews), Team Dinner - \$264.64 Hotel, Meal, July 20, 2023 (Austin, TX) (Interviews) - \$33.15 Mileage, July 20, 2023 (Austin, TX) (Interviews) - \$33.15

EXPENSE TOTAL: \$1,443.50

INVOICE TOTAL: \$107,943.50

OF COUNSEL LEWIS DICKSON CATHERINE BAEN MARK WHITE III CRAIG ANTHONY WASHINGTON LIZ ROGERS, ALPINE SHANE O'NEAL, ALPINE

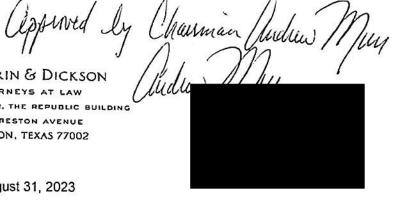
DEGUERIN & DICKSON

ATTORNEYS AT LAW

SEVENTH FLOOR, THE REPUBLIC BUILDING IOIS PRESTON AVENUE

HOUSTON, TEXAS 77002

August 31, 2023



RECEIVED

NOV 2 8 2023

ACCOUNTING

State Representative Andrew Murr

Attention:

Logan Harrison, Chief of Staff

Re:

Dick DeGuerin - Submission of Time Sheets

HOUSE OF REPRESENTATIVES

Impeachment and Trial of Warren Kenneth Paxton, Attorney General of the

State of Texas

FOR PROFESSIONAL SERVICES RENDERED FROM AUGUST 1, 2023 THROUGH AUGUST 31, 2023.

August 1, 2023	Tuesday	Texts, emails, media; Team zoom call; planning motions, witness interviews.	4.00
August, 2, 2023	Wednesday	Texts, emails, media; BOM zoom meeting; receive and review Paxton pleadings; review witness binders for tomorrow.	4.00
August 3, 2023	Thursday	Travel Hou-Aus-Hou; witness interviews x3; texts, emails, media.	12.00
August 4, 2023	Friday	Travel Hou-Nashville-Hou; texts, emails, media; witness interview.	12.00
August 5, 2023	Saturday	Texts, emails, media; multiple filings by Paxton; receive and review; schedule meeting.	11.00
August 6, 2023	Sunday	Texts, emails, media; Team zoom conference; telephone calls attorney, co-counsel review Paxton motions, Brisbois report.	6.00
August 7, 2023	Monday	Texts, emails, media; make arrangements for upcoming witness interviews; telephone conference with co-counsel.	2.00
August 8, 2023	Tuesday	Texts, emails, media; travel Hou-Austin; review pleadings; prepare for interviews.	4.00

Re: Impeachment and Trial of Warren Kenneth Paxton August 31, 2023 Page 2

August 9, 2023	Wednesday	Texts, emails, media; interviews: witnesses x2; meet with attorney for witness; Team conference call re: immunity.	9.00
August 10, 2023	Thursday	Texts, emails, media; meet with witness and attorney; witness interviews: witness and attorney; travel Austin-Ranch.	8.00
August 11, 2023	Friday	Texts, emails, media; review Paxton MTDs, Brisbois report, Motion to Quash subs 11 th Supp production.	2.00
August 12, 2023	Saturday	Texts, emails, media; review Motion to Compel Discovery; Paxton subpoena recipients.	1.00
August 13, 2023	Sunday	Texts, emails, media; review Paxton letter to Patrick re: Paxton Motion to Compel; review draft responses.	2.00
August 14, 2023	Monday	Texts, emails, media; travel Hou-Dal-Fresno-Hou; witness interviews; witness and attorney x2.	14.00
August 15, 2023	Tuesday	Texts, emails, media; telephone interviews; review Paxton transcript with APD; review witness response to Paxton subpoena; review our responses.	6.00
August 16, 2023	Wednesday	Texts, emails, media; review our filed motions; BOM zoom meeting; Team conference call re: witness.	6.00
August 17, 2023	Thursday	Texts, emails, media; prepare for interview with witness; interview witness.	8.00
August 18, 2023	Friday	Texts, emails, media; our response to Paxton Motion to Compel; schedule witnesses x2; prepare.	8.00

Re: Impeachment and Trial of Warren Kennth Paxton August 31, 2023 Page 3

August 19, 2023	Saturday	Texts, emails, media; Patrick advisor appointed yesterday, then withdraws; review info re: DPS; schedule interviews; draft witness list.	6.00
August 20, 2023	Sunday	Texts, emails, media; received 5 books of exhibits; started reviewing; 1:00 zoom until 2:30.	6.00
August 21, 2023	Monday	Texts, emails, media; reviewing exhibits; zoom and Team meeting 5:00-6:30.	8.00
August 22, 2023	Tuesday	Texts, emails, media; telephone conference attorney; witness lists; subpoenas; witness production logistics; witness production x2; text attorney for Sheena Paul; review attorney emails re: Laura Olsen.	8.00
August 23, 2023	Wednesday	Texts, emails, media; BOM zoom 10:00-11:00; Team zoom 4:00-5:30; telephone conference lawyer; review interviews.	6.00
August 24, 2023	Thursday	Texts, emails, media; travel Hou-Aus-Hou; witness interview and materials 10:30-2:00; interview reporter; op-ed by Rick Perry; Paxton subpoenaed our inv. Team; telephone conference co-counsel re: Motion to Quash.	9.00
August 25, 2023	Friday	Texts, Emails, media; telephone conference co-counsel; telephone conference reporter re: G.J.; receive and review witness interview (DPS); review HR Complaint.	5.00
August 26, 2023	Saturday	Texts, emails, media; review co-counsel memo re: AG Charity Intervention; share with Team; reviewing interviews.	4.00
August 27, 2023	Sunday	Texts, emails, media; working on timeline and interviews.	6.00
August 28, 2023	Monday	Texts, emails, media; pack and travel Hou-Aus; telephone conference co-counsel re: opening; draft opening for BM.	8.00

Re: Impeachment and Trial of Warren Kenneth Paxton

August 31, 2023

Page 4

August 29, 2023	Tuesday	Texts, emails, media; witness discuss, BOM presentation.	8.00
August 30, 2023	Wednesday	Texts, emails, media; meeting on Senate Floor with Patrick, Patrick attorney; witness interview; interview cancelled; office and hotel to review materials.	8.00
August 31, 2023	Thursday	Texts, emails, media; review materials; conference BOM; preparing Mitte. 8.00	

TOTAL HOURS FOR DICK DeGUERIN: 209.00

OF COUNSEL MARK WHITE:

August 1, 2023	Tuesday	Review witnesses x4 interview transcripts; phone call with co-counsel re: Paxton's Motion for Bill of Particulars; research OAG documents for documents related to the Mitte Foundation litigation.	9.50
August 2, 2023	Wednesday	Review witnesses x2 interview transcripts.	7.50
August 3, 2023	Thursday	Review witness interview transcript; evaluate evidence relevant to the financial investigation into the Esther Blind Trust and Paxton accounts; research Texas law of trusts to ascertain law applicable to blind trusts and charitable trusts; prepare for meeting with expert witness and the financial investigation team.	5.25
August 4, 2023	Friday	Review Texas law related to blind and charitable trusts; attend meeting of the financial investigation team.	5.25
August 7, 2023	Monday	Draft email to co-counsel regarding the financial investigation team's progress and findings to seek guidance on focus for the team's effort moving forward.	1.50

Impeachment and Trial of Warren Kenneth Paxton

August 31, 2023 Page 5

August 10, 2023	Thursday	Review multiple Paxton motions and other pleadings, BOM draft responses to those motions; listen to audio recordings made by witness; review Ken Paxton's deposition in SEC proceeding; review interview summaries for witnesses x9; review witness memo sent by witness regarding potential charges against Paxton.	8.50
August 11, 2023	Friday	Review Paxton's deposition in SEC proceeding.	1.25
August 12, 2023	Saturday	Review Paxton's deposition in SEC proceeding.	3.00
August 14, 2023	Monday	Review Paxton's motions and draft BOMs reply briefs.	1.50
August 15, 2023	Tuesday	Review Paxton's motions and draft BOM reply briefs; review witness response to Paxton Motion to Compel.	2.00
August 17, 2023	Thursday	Review witness interview and Paxton's motions and replies to them by BOMs draft email regarding Paxton's reply to Texans for Lawsuit Reform pleading.	1.00
August 18, 2023	Friday	Review witnesses x2 interviews and Paxton's motions and replies to them by the BOM.	1.50
August 20, 2023	Sunday	Attend Team meeting to prepare for the impeachment trial.	1.50
August 25, 2023	Friday	Review witness interview notes; review Texas law on trusts and the supposed right of OAG to intervene; draft and revise email to the Team on strategy.	3.25
August 26, 2023	Saturday	Review all motions and replies to motions; take notes on Paxton's numerous motions to dismiss; telephone call with co-counsel about trial strategy.	7.00

Re: Impeachment and Trial of Warren Kenneth Paxton August 31, 2023

Page 6

August 29, 2023	Tuesday	Travel to Austin; meet with House General committee on Investigation for trial strategy presentation; team discussions and meetings to plan and revise trial presentation.	9.50
August 30, 2023	Wednesday	Meeting with team and the House Impeachment Managers; meeting with the Lt. Governor to discuss trial management; research, draft, and revise email on the OAG's criminal jurisdiction.	8.00
August 31, 2023	Thursday	Review documents for transport to Austin.	_1.00
		TOTAL HOURS FOR MARK WHITE:	78.00

Dick DeGuerin 209 hours @\$500.00/hr. = \$104,500.00 Mark White 78 hours @\$500.00/hr. = \$39,000.00

FEE TOTAL: \$143,500.00

EXPENSES:

Airfare, August 4, 2023 (Hou-Nashville-Hou) (Interview) - \$819.97
Taxi, August 4, 2023 (Nashville) (Interview) - \$36.00
Parking, August 4, 2023 (IAH) (Nashville Interview) - \$28.00
Mileage, August 8, 2023 (Hou-Austin) (Interviews) 160mi x \$0.655 - \$104.80
Hotel, August 8-10, 2023 (Austin, TX) (Interviews) - \$459.05
Hotel Breakfast, August 9, 2023 (Austin, TX) (Interviews) - \$33.15
Food, August 9, 2023 (Austin) (Interviews/Team Mtg) - \$36.23
Mileage, August 10, 2023, (Austin to Ranch) 77 mi. x \$0.655 - \$50.44
Airfare, August 14, 2023 (Hou-Dal-Hou) (Interviews) - \$637.97
Parking, August 14, 2023 (IAH) (Dallas Interviews) - \$28.00
Uber, August 29, 2023 (Austin, TX) (Team, 3pp, hotel to restaurant) - \$28.39
Uber, August 29, 2023 (Austin, TX) (Team, 3pp, restaurant to hotel) - \$27.63

EXPENSE TOTAL: \$2,289.63

INVOICE TOTAL: \$ 145,789.63

0.5

Or Counsel
LEWIS DICKSON
CATHERINE BAEN
MARK WHITE III
CRAIG ANTHONY WASHINGTON
LIZ ROGERS, ALPINE
SHANE O'NEAL, ALPINE

DECUERIN & DICKSON

ATTORNEYS AT LAW

SEVENTH FLOOR, THE REPUBLIC BUILDING

HOUSTON, TEXAS 77002

September 16, 2023



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ACCOUNTING

State Representative Andrew Murr

Attention:

Logan Harrison, Chief of Staff

Impeachment and Trial of Warren Kenneth Paxton, Attorney General of the OF REPRESENTATIVES

State of Texas

FOR PROFESSIONAL SERVICES RENDERED FROM SEPTEMBER 1, 2023 THROUGH SEPTEMBER 16, 2023

September 1, 2023	Friday	Texts, emails, media; prep witness; prep witness; prep witness.	9.00
September 2, 2023	Saturday	Texts, emails, media; Team meeting; prep witness; second Team meeting re: privilege and AG experts.	9.00
September 3, 2023	Sunday	Texts, emails, media; meet with co-counsel; meet with co-counsel; prep witness; prep witness; prep witness.	6.00
September 4, 2023	Monday	Texts, emails, media; prep witness; prep witness; Team meeting; prep BOM opening.	6.00
September 5, 2023	Tuesday	Texts, emails, media; trial begins; motions ruled on; testimony witness; meet with witnesses x2.	12.00
September 6, 2023	Wednesday	Texts, emails, media; Trial Day 2; witnesses x2.	12.00
September 7, 2023	Thursday	Texts, emails, media; Trial Day 3; witnesses x2; meet with witness.	11.00
September 8, 2023	Friday	Texts, emails, media; Trial Day 4; witnesses x2.	12.00
September 9, 2023	Saturday	Texts, emails, media; Team meeting; review witnesses; prepare.	8.00

Re: Impeachment and Trial for Warren Kenneth Paxton September 16, 2023

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September 10, 2023	September 10, 2023 Sunday Texts, emails, media; prep for witness conference; witness prep x5.		13.00
September 11, 2023	Monday	Texts, emails, media; Trial Day 5; witnesses x3.	12.00
September 12, 2023	Tuesday	Texts, emails, media; Trial Day 6; witness; witness prep; witness; Amplify Bank.	10.00
September 13, 2023	Wednesday	Texts, emails, media; Trial Day 7; witnesses x3.	10.00
September 14, 2023	Thursday	Texts, emails, media; Trial Day 8; Defendant's witnesses x3; work on argument BOM.	11.00
September 15, 2023	Friday	Texts, emails, media, Trial Day 9; work on argument with Team and BOM.	7.00
September 16, 2023	Saturday	Texts, emails, media; Trial Day 10; receive Verdict; travel Austin-Houston.	_5.00
		TOTAL HOURS FOR DICK DeGUERIN	153.00
OF COUNSEL MAR	RK WHITE:		
September 5, 2023	Tuesday	Attend trial; meet with legal team re: attorney/ client privilege waiver issues; draft insert for trial brief on privilege waiver.	14.50
September 6, 2023	Wednesday	Attend trial; review Government Code provisions dealing with the authority to hire outside counsel.	9.50
September 7, 2023	Thursday	Attend trial; research government procurement And records preservation; prepare for witness Testimony.	11.00

Impeachment and Trial for Warren Kenneth Paxton Re:

September 16, 2023 Page 3

September 8, 2023	Friday	Attend trial.	8.00
September 9, 2023	Saturday	Strategy meeting and for closing argument brainstorm meeting.	4.00
September 11, 2023	Monday	Attend witness preparation meeting and researching/drafting an email on government contracting and records retention laws in Texas; went to Clerk's Office to request documents;	
		analyzing Cupertino bank records.	8.00
September 12, 2023	Tuesday	Assist in trial.	8.00
September 13, 2023	Wednesday	Assist in trial; review financial records; review transcripts of trial for closing argument material.	10.00
September 14, 2023	Thursday	Attend trial.	8.00
September 15, 2023	Friday	Attend trial.	7.00
September 16, 2023	Saturday	Verdict; travel Austin-Houston.	1.50
		TOTAL HOURS FOR MARK WHITE:	89.50

Re: Impeachment and Trial of Warren Kenneth Paxton

September 16, 2023

Page 4

Dick DeGuerin 153 hours @\$500.00/hr. = \$76,500.00 Mark White 89.5 hours @\$500.00/hr. = \$44,750.00

FEE TOTAL: \$121,250.00

EXPENSES:

Uber, September 2, 2023 (Austin) (Hotel to restaurant w/Team) - \$21.49 Dinner, September 4, 2023 (Austin) (With co-counsel) - \$180.47 Breakfast, September 5, 2023 (Austin) (with co-counsel) - \$32.15 Dinner, September 6, 2023 (Austin) (With co-counsel) - \$207.68 Breakfast, September 7, 2023 (Austin) (co-counsel) - \$11.74 Uber, September 9, 2023 (Austin) (Supper to hotel) - \$24.02 Breakfast, September 13, 2023 (Austin) (co-counsel) - \$18.16 Meal, September 15, 2023 (Austin) (co-counsel) - \$41.04 Hotel, August 28-September 16, 2023 (Austin, trial) Mark White And Dick DeGuerin - \$6,988.41 Mileage, September 16, 2023 (Aus-Hou) 160 mi. x \$0.655 - \$104.80

EXPENSE TOTAL: \$7,629.96

INVOICE TOTAL: \$128,879.96

KENNEDY

Invoice

DATE

INVOICE NO

5/28/2023

2305061-R

A record of excellence

BILL TO

House Business Office Scott Siebert Assistant Executive Director PLEASE NOTE NEW ADDRESS FOR REMITTANCE!

Kennedy Reporting Service, Inc.

100 E. Whitestone Blvd. Ste. 148 Cedar Park, TX 78613

JOB NUMBER

SERVICE ORDERED BY

DOCKET NUMBER

CASE NAME

23114

Scott Siebert

House

ITMO Warren Kenneth Paxton

DATE TAKEN	DESCRIPTION	QUANTITY	RATE	AMOUNT
5/24/2023 5/24/2023	Texas House of Representatives Committee on General Investigation Presentation of the Evidence In the Matter of Warren Kenneth Paxton Public Hearing Hourly Reporting Fee Original & Two Copies - Daily Administrative Fee Tax ID# 74-1837735	4 158 1	50.00 14.30 45.00	200.00 2.259.40 45.00
,	TERMS Due on receipt	Total		\$2.504.40

Payments/Credits

\$0.00

Balance Due

\$2,504.40

5-30/2023

RE: Invoice 1682 from New West Communications



Retention Policy Inbox - 30 Days (30 days)

Expires 7/29/2023

i) This item will expire in 30 days. To keep this item longer apply a different Retention Policy.



Hey Steve,

Attached below is an invoice for General Investigating that Chairman Murr has approved.

Does this format work? Could you help us move forward with getting this one paid?

Appreciate your help, hope all is well.

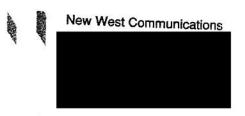
Logan Harrison | Chief of Staff
State Representative Andrew Murr
HD - 53 | Austin Office

Subject: Invoice 1682 from New West Communications

INVOICE 1682

MAN

Now Most Communications



BILL TO

Texas House General Investigating Committee INVOICE # 1682

DATE 06/29/2023

DUE DATE 07/29/2023

TERMS Net 30

06/01/2023

Communications Support

June 2023 services

5,000.00

5,000.00

BALANCE DUE

\$5,000.00

RECEIVED

JUN 2 9 2023



BILL TO

Texas House General Investigating Committee Approved by Chairman Andrew Mun Andrew May

INVOICE # 1708

DATE 07/31/2023

DUE DATE 08/30/2023

TERMS Net 30

DATE

ACTIVITY

DESCRIPTION

RATE

AMOUNT

07/01/2023

Communications Support July 2023 services

6,000.00

6,000.00

BALANCE DUE

\$6,000.00

RECEÍVED

DEC 0 4 2023



BILL TO

Texas House General Investigating Committee Clessived by Charmian Andrew Muse Andrew Muse

INVOICE # 1717
DATE 08/15/2023
DUE DATE 09/14/2023
TERMS Net 30

DATE

ACTIVITY

DESCRIPTION

RATE

AMOUNT

08/01/2023

Communications Support

August 2023 services

7,000.00

7,000.00

BALANCE DUE

\$7,000.00

RECEIVED

DEC 0 4 2023



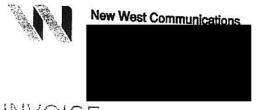
BILL TO

Texas House General Investigating Committee aproved Andrew Muy

*****************		BALANCE DUE	***************************************	***************************************
09/01/2023	Communications Support	September 2023 services	7,000.00	7,000.00
09/01/2023	ACTIVITY	DESCRIPTION	RATE	AMOUNT

RECEIVED

NOV 2 0 2023



BILL TO

Texas House General Investigating Committee

INVOICE # 1753 DATE 10/30/2023 **DUE DATE 11/29/2023** TERMS Net 30

DATE

ACTIVITY

DESCRIPTION

RATE

ASSESSED.

10/01/2023 Communications Support

October 2023 services

7,000.00

7,000.00

BALANCE DUE

\$7,000.00

RECEIVED

NOV 2 0 2023



September 20, 2023

Texas House of Representatives Board of Managers c/o Logan Harrison

Re: In The Matter of Warren Kenneth Paxton, Jr.; Texas Senate Sitting as High Court of Impeachment

Dear Logan:

Please find enclosed my invoice in the above-referenced matter for my time through July 2023. If you have any questions or concerns, don't hesitate to give me a call.

I appreciate the opportunity to assist you in this matter.

Sincerely,

Harriet O'Neill

Harriel O. rill

/lg Enclosures

RECEIVED

NOV 2 0 2023

Texas House of Representatives Board of Managers c/o Logan Harrison

September 20, 2023

Re:

In The Matter of Warren Kenneth Paxton, Jr.; Texas Senate Sitting as High Court of Impeachment

Invoice #

10876

Professional Services

		Hours	Amount
06/09/23	Review Stone I Hilton cease-and-desist letter, background materials and Articles of Impeachment	1.30	650.00
06/12/23	Review constitutional and statutory provisions on impeachment proceedings; review Texas Supreme Court impeachment jurisprudence and Senate Rules governing impeachment proceedings in <i>Ferguson</i> and <i>Carillo</i> ; telephone conference with legal team re status, strategy and next steps; review and suggest edits to proposed rules memorandum	4.80	2,400.00
06/14/23	Prepare for and participate in impeachment legal team meetings; continue review of impeachment background materials; continue review of rules memorandum	3.30	1,650.00
06/15/23	Telephone conferences with legal team re multiple process and substance issues; review Stone I Hilton letters re House Managers subpoena and investigatory powers and statutory basis; continue review of impeachment background material; review draft response letter and telephone conference with legal team re salient points	5.40	2,700.00
06/16/23 RECEIVED	Review Paxton letter to Senate Rules Committee, House Managers' prior rules proposals and various background materials; prepare potential response for discussion with legal team; participate in legal team discussions re	3.40	1,700.00

NOV 2 0 2023

		Hours	Amount
	strategy; review email correspondence among legal team re recent developments		
06/20/23	Monitor Senate rules proceedings and email correspondence with legal team; telephone conferences with legal team re status, strategy and additional resources	1.60	800.00
06/21/23	Participate in impeachment team conferences and monitoring of Senate rules proceedings; conference with legal team re briefing points to develop	1.70	850.00
06/22/23	Review and notate Senate rules for impeachment trial in conjunction with articles of impeachment; continue review of impeachment background materials; telephone conference with impeachment team re legal points to further develop	3.40	1,700.00
06/23/23	Participate in impeachment team meeting and follow-up telephone conferences with legal team; continue review of impeachment background materials	3.60	1,800.00
06/27/23	Review and notate hearing before General Investigating Committee	3.60	1,800.00
06/29/23	Review draft list of legal issues to be addressed; participate in Zoom conference with trial team and BOM	2.50	1,250.00
07/05/23	Prepare for and participate in impeachment team meeting	0.90	450.00
07/09/23	Telephone conference with legal team re outstanding issues for research and privilege-waiver issues; participate in impeachment team teleconference re waiver of attorney-client privilege for witnesses	2.60	1,300.00
07/11/23	Review and suggest revisions to draft House Managers' Notice Regarding Paxton's recent motions; review correspondence regarding Paxton's motions	0.80	400.00
07/12/23	Attention to email correspondence among impeachment team on various legal points; participate in team meeting and follow-up telephone conferences	1.40	700.00
07/14/23	Participate in impeachment team conference call on various impeachment issues; telephone conference with legal team on motions issues; review notes and email correspondence on motions and other issues	1.40	700.00
07/16/23	Review and participate in discussions re correspondence between impeachment team and Paxton's counsel over discovery issues	1.20	600.00
07/17/23	Review email correspondence with Paxton's counsel and participate in preparation of response; remotely attend investigation meeting re OAG foreclosure opinion and Mitte Foundation intervention; review and revise various correspondence with Paxton's counsel re discovery and confidentiality issues; monitor correspondence re investigation and discovery	4.60	2,300.00

		Hours	Amount
07/18/23	Monitor correspondence re investigation and discovery; review Lt. Gov. Gag Order; review Paxton Response to BOM Motion to Clarify	1.10	550.00
07/19/23	Review correspondence re investigation and discovery; participate in impeachment team conference; telephone conference with legal team re statutory confidentiality provision	3.30	1,650.00
07/20/23	Conference with investigative/legal team re production status, protective order, subpoenas and miscellaneous issues; review investigative summaries; telephone conferences with legal team re Lt. Governor production order and next steps	2.40	1,200.00
07/22/23	Conferences with legal/motions team re list of motions, strategy and next steps; continue review of background impeachment materials	1.60	800.00
07/25/23	Review Paxton motions for bill of particulars and to quash, and email correspondence among legal team; review impeachment team updates; review Carillo proceedings	3.10	1,550.00
07/26/23	Continue review of Paxton motions and notes of related discussions; participate in multiple conferences with BOM, impeachment team, motions team, and GIC team; review and edit Notice to Senate re Paxton Motion to Quash and for Bill of Particulars; review email correspondence regarding motions and related issues; review Ferguson proceedings	7.30	3,650.00
07/31/23	Review Paxton motions to dismiss and exclude evidence based on prior-term doctrine; review legal authorities cited in motions and Senate Rules and Resolutions; participate in multiple conferences with impeachment team on pending motions and strategy	4.60	2,300.00
For profes	ssional services rendered	70.90 \$	35,450.00
Polones d		***************************************	
Balance d	ue	\$	35,450.00
		A1	

HARRIET O'NEILL A PROFESSIONAL CORPORATION

919 Congress Avenue, Suite 1400 Austin, Texas 78701 • (512) 944-2222

September 21, 2023

Texas House of Representatives Board of Managers c/o Logan Harrison

Re: In The Matter of Warren Kenneth Paxton, Jr.; Texas Senate Sitting as High Court of Impeachment

Dear Logan:

Please find enclosed my invoice in the above-referenced matter for my time through September 2023. If you have any questions or concerns, don't hesitate to give me a call.

I appreciate the opportunity to assist you in this matter.

Sincerely,

Harriet O'Neill

Harriel O. rill

/lg Enclosures

RECEIVED

NOV 2 0 2023

Asserved Undew Muy

Texas House of Representatives Board of Managers c/o Logan Harrison

September 21, 2023

Re:

In The Matter of Warren Kenneth Paxton, Jr.; Texas Senate Sitting as High Court of Impeachment

Invoice #

10877

Professional Services

		Hours _	Amount
08/01/23	Multiple conferences with motions team re affirmative and responsive motions; review draft motion to exclude evidence/argument on House process, and review pertinent legal authorities; prepare suggested revisions to draft motion and telephone conferences with motions team re same; review prior Texas impeachment proceedings	9.20	4,600.00
08/02/23	Review materials in preparation for BOM meeting; participate in BOM meeting and follow up with legal team; telephone conference with legal team re structuring motions and responses; continue review of Ferguson proceedings	4.30	2,150.00
08/03/23	Review proposed strategy for consolidating responses to Paxton motions and email correspondence with legal team re same; conference with motions team re substantive points for responses to Paxton motions; review email correspondence among legal team on various strategy and investigative points; review and edit BOM Motion for Clarification of Senate Rules	4.80	2,400.00
08/04/23	Multiple telephone conferences with legal team re motions and strategy; review draft motion/notes re attorney-client privilege and relevant documents	3.80	1,900.00
RECENTED	100 100 100 100 100 100 100 100 100 100		

NOV 2 0 2023

00/05/00		Hours	Amount
08/05/23	Telephone conferences with legal team re status of motions and potential responses; review email correspondence on Paxton motions and begin review of motions	1.20	600.00
08/06/23	Continue review of Paxton motions; participate in impeachment team conferences on Paxton motions and organization/strategy for responses; review transcript of Buzbee radio interview	4.20	2,100.00
08/07/23	Correspondence among legal team re Paxton motions and related strategy; review draft response to Motion to Quash and for Bill of Particulars; prepare suggested edits and intro points; review background materials for preparing BOM response; continue review of past Texas impeachment proceedings	6.60	3,300.00
08/08/23	Review and edit draft of BOM Response to Paxton Motion to Quash, and email correspondence with legal team re same; telephone conference with legal team re responses to various motions	4.60	2,300.00
08/09/23	Review and edit draft BOM Response to Paxton Request for Bill of Particulars, and email correspondence with legal team re same; extended telephone conferences with legal team re OAG attorney-client privilege claims, motions and responses; begin review of draft BOM Response to Paxton Motion to Exclude Evidence Gathered in Violation of Law	4.80	2,400.00
08/10/23	Continue review of, and prepare edits to, draft BOM Response to Paxton Motion to Exclude Evidence Gathered in Violation of Law; telephone conferences with legal team re status of motions and next steps	7.50	3,750.00
08/11/23	Review and prepare edits to BOM response to Paxton Motion to Exclude Evidence based on the forgiveness doctrine, and review cited legal authorities; telephone conference with legal team re status of motions and next steps; begin review of BOM Response to Lewis Brisbois Motion to Quash and related authorities	9.80	4,900.00
08/12/23	Continue review and editing of BOM Response to Lewis Brisbois Motion to Quash; review cited references and authorities; email correspondence among legal team re various points on Lewis Brisbois Response; review and edit draft of BOM Consolidated Response to Paxton Motion to Dismiss Articles III and IV, and email correspondence among legal team re points for discussion	10.10	5,050.00
08/13/23	Review Paxton Motion to Dismiss Article II, Motion to Dismiss Article III-IV, and Motion to Dismiss Articles IX-X; review and edit drafts of BOM Responses; review citations and related legal authorities; telephone conferences with legal team re motions, responses and next steps; review draft of Paxton Motion for Notice of Brady Materials; review and edit draft BOM Response; review most recent draft of BOM Response to Lewis Brisbois Motion to Quash; review and edit draft of BOM Response to Paxton Motion to Disqualify Senators	11.20	5,600.00

00/44/00		Hours	Amount
08/14/23	Review Paxton Motion to Dismiss Article VIII (Whistleblower Settlement); review draft BOM Response to Article VIII motion and prepare edits; review Paxton Motion to Disqualify Senators, and review and edit BOM Response; review Paxton Motion to Exclude Evidence of Nate Paul Campaign Contribution, and review and edit BOM Response; prepare final revisions to BOM Response to Lewis Brisbois Motion to Quash; review Paxton Motion to Dismiss Article I (Mitte Foundation), and review and edit BOM Response; review multiple Poyton Materials	11.40	5,700.00
	review multiple Paxton Motions to Dismiss and BOM Responses, and prepare suggested edits; review legal authorities cited in various Paxton motions and BOM responses; telephone conferences with legal team re various Response points		
08/15/23	Continue review of draft BOM Responses to multiple Paxton motions, and prepare suggested edits	4.70	2,350.00
08/16/23	Participate in Zoom meeting with BOM	1.00	500.00
08/20/23	Review and annotate filed Paxton Motions and BOM Responses; participate in Zoom meeting with impeachment team re trial logistics, subpoenas, witnesses and other trial-related issues; continue review of Carillo proceedings	6.60	3,300.00
08/21/23	Participate in Zoom meeting with impeachment team re treatment of motions at trial; review list of motions and legal authorities cited therein	3.80	1,900.00
08/24/23	Continue review of motions, authorities and exhibits in preparation for potential questioning/argument at impeachment trial; telephone conference with Ms. Hobbs re resources needed for preparation	4.10	2,050.00
08/25/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; review various Senate filings	5.40	2,700.00
08/26/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial, and prepare talking points on articles	4.20	2,100.00
08/27/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; continue preparation of talking points on articles; Zoom conference with legal team re status of preparation on motions and OAG attorney-client privilege issues	8.30	4,150.00
08/28/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; continue preparation of talking points on articles; telephone conference with legal team re Article V points and background	7.70	3,850.00
08/29/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; continue preparation of talking points on articles	6.80	3,400.00

		Uarra	2
08/30/23	Meeting with legal team and BOM; attend pre-trial	<u>Hours</u>	Amount
	meeting with Lt. Governor and Judge Myers and follow up meeting with impeachment team; continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial, and continue preparation of talking points on articles		4,350.00
08/31/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; continue preparation of talking points on articles	8.20	4,100.00
09/01/23	Continue review of motions, authorities and exhibits in preparation for trial; continue preparation of talking points on articles; review email correspondence among legal team on various issues	9.40	4,700.00
09/02/23	Continue review of motions, authorities and exhibits in preparation for trial; continue preparation of talking points on articles; review email correspondence among legal team; participate in impeachment team conference on opening statement, attorney-client privilege, and miscellaneous issues	7.60	3,800.00
09/03/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; continue preparation of talking points on articles; review email correspondence among legal team on various issues; telephone conference with legal team re multiple trial preparation issues	8.20	4,100.00
09/04/23	Continue review of motions, authorities and exhibits in preparation for potential argument/questioning at trial; continue preparation of talking points on articles; review email correspondence among legal team on multiple issues; telephone conferences with legal tea on various points for argument	12.30	6,150.00
09/05/23	Prepare for and participate in Senate impeachment trial and meetings with impeachment team; conferences with legal team in preparation for attorney-client privilege issue; review Paxton Motion to Quash and BOM Attorney-Client Privilege Brief; prepare for argument on attorney-client privilege issue and review related legal authorities	19.80	9,900.00
09/06/23	Participate in Senate impeachment trial and meetings with impeachment team	9.30	4,650.00
09/07/23	Participate in Senate impeachment trial and meetings with impeachment team	10.10	5,050.00
09/08/23	Participate in Senate impeachment trial and meetings with impeachment team	7.80	3,900.00
09/09/23	Participate in impeachment team meeting to strategize closing argument	2.10	1,050.00
09/10/23	Participate in witness information meetings; email correspondence with legal team re potential Paxton motion for directed verdict and other legal issues; telephone conference with legal team re same	4.80	2,400.00

494.000 T000		Hours	Amount
09/11/23	Participate in Senate impeachment trial and meetings with impeachment team; post-trial conference among impeachment team members re issues for closing, directed verdict motion and witness order	10.50	5,250.00
09/12/23	Participate in Senate impeachment trial and meetings with impeachment team; review and revise draft BOM Motion to Enforce Order of Proceedings, and prepare to argue points against Paxton motions for directed verdict	14.40	7,200.00
09/13/23	Continue preparation for argument of BOM Motion to Enforce Order of Proceedings and Disallow Motions for Directed Verdict; participate in Senate impeachment trial and meetings with impeachment team; review BOM Motion to Reconsider Senate Rules on disqualification vote	12.30	6,150.00
09/14/23	Continue review of BOM Motion to Reconsider Senate Rules on disqualification vote and Paxton Response; prepare to argue Motion; participate in Senate impeachment trial and meetings with impeachment team	11.20	5,600.00
09/15/23	Review and revise draft BOM Motion to Extend Judgment to Disqualification and email correspondence with legal team re same; review Motions regarding holding of Articles in abeyance in event of conviction or acquittal, and email correspondence with legal team re same; participate in Senate impeachment trial and meetings with impeachment team	8.50	4,250.00
09/16/23	Participate in impeachment trial and post-verdict meeting with BOM and impeachment team	4.00	2,000.00
Fo	or professional services rendered	315.30	\$157,650.00
В	alance due	-	\$157,650.00

Mirved by Chairman andun RUSTY HÁRDIN & ASSOCIATES, LLP

Texas House of Representatives Board of Managers Chairman Andrew Murr, House Board of Managers ATTN: Logan Harrison P. O. Box 2910, Room E1.308 Austin, TX 78768

Fed Tax ID#76-0518681 Invoice # 23386 Client/Matter No. 3655.01 -Impeachment November 20, 2023

In Reference To: Impeachment Proceedings of

LEGAL FEES

5/30/2023 RH

Texas Attorney General Warren Kenneth Paxton, Jr.

STATEMENT

HRS/RATE AMOUNT Telephone conference with RHA lawyers in 5/28/2023 RH 0.50 NO CHARGE reference to being asked to be Special Counsel in 500.00/hr impeachment proceedings. JR Telephone conference with RHA lawyers 0.50 NO CHARGE regarding new matter. 500.00/hr LH Firm call regarding new matter. 0.50 NO CHARGE 500.00/hr RKH Team conference call.

Meeting with parties and RHA team to learn facts

of case and timeline.

RECEIVED

0.50

500.00/hr

2.50

500.00/hr

NO CHARGE

1,250.00

NOV 2 8 2023

ACCOUNTING HOUSE OF REPRESENTATIVES

			HRS/RATE	AMOUNT
5/30/2023	LH	Research regarding impeachment law and presentation to House of evidence regarding Paxton potential impeachment; meeting with team regarding same.	4.50 500.00/hr	2,250.00
	RKH	Prepare for and attend team meeting.	2.50 500.00/hr	NO CHARGE
	TK	Attend team meeting.	2.00 500.00/hr	NO CHARGE
	AD	Attend team meeting.	2.50 500.00/hr	1,250.00
	JY	Meeting with impeachment team; pre-meeting with RHA team.	2.50 200.00/hr	500.00
5/31/2023	RH	Telephone conversation with House Manager to discuss announcement of team; telephone conference with Dick DeGuerin and House Manager to solicit views; telephone conference with Dick DeGuerin to discuss review of emails and texts arranging for press conference in Austin announcing team; telephone conference with Dick DeGuerin to discuss public announcement; review of materials, including impeachment presentation to the House; telephone conference with Dick DeGuerin and special investigation group in preparation for receipt of information on the investigation; review of materials suggested by special investigation group.	7.00 500.00/hr	3,500.00
	LH	Conduct legal research regarding impeachment law and procedure.	2.75 500.00/hr	1,375.00
	SJ	Review investigators' files; work on logistics of team members' full access to same.	1.50 200.00/hr	300.00
6/1/2023	RH	Travel to Austin for press conference announcing Dick DeGuerin and our retention; review of the record of presentation for impeachment materials prepared by investigative team; meeting with House Managers; appearance at press conference; return to Houston.	10.00 500.00/hr	5,000.00

		HRS/RATE	AMOUNT
6/1/2023 LH	Review House proceedings on Paxton impeachment.	0.75 500.00/hr	375.00
6/2/2023 RH	Participate with Dick DeGuerin in podcast interview with WFAA in Dallas.	0.75 500.00/hr	375.00
RH	Review of impeachment presentation in the House.	3.00 500.00/hr	1,500.00
LH	Review impeachment case law and history.	6.00 500.00/hr	3,000.00
6/3/2023 RH	Continued review of impeachment presentation in the House.	2.00 500.00/hr	1,000.00
6/4/2023 RH	Telephone conference with Board of Managers lawyer regarding meetings going forward; telephone conference with Board of Managers lawyer regarding strategy going forward.	0.50 500.00/hr	250.00
RH	Interview with witness with Leah Graham, Aisha Dennis, Armie Lewis, Jim Yarbrough, Board of Managers lawyers, and Dick DeGuerin.	1.00 500.00/hr	500.00
LMG	Prepare for and attend strategy call and interview with witness regarding relevant information and materials.	1.50 500.00/hr	750.00
AD	Review House committee hearing.	3.00 500.00/hr	1,500.00
ACL	Telephone call with witness.	1.00 500.00/hr	500.00
AD	Meeting with witness.	1.00 500.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
6/4/2023 JY	Interview of witness, with Rusty Hardin, Leah Graham, Aisha Dennis, Armie Lewis, Board of Managers lawyers, and Dick DeGuerin.	1.00 200.00/hr	200.00
6/5/2023 RH	Multiple telephone conferences with members of the team; telephone conference with witness; additional telephone conference with team members; telephone conference with team members and witness.	3.50 500.00/hr	1,750.00
LH	Draft memo regarding prior impeachment procedure and impeachment law.	4.50 500.00/hr	2,250.00
LMG	Legal research regarding potential witness and additional factual investigation; multiple conferences with Jim Yarbrough regarding same.	4.50 500.00/hr	2,250.00
SJ	Upload and organize investigators' files; create team email for group communications.	2.00 200.00/hr	400.00
JY	Begin research of witness and confer with Leah Graham regarding same.	3.00 200.00/hr	600.00
6/6/2023 RH	Confer with Jim Yarbrough and Stella Jares regarding group email, text logistics, and upcoming team meeting.	0.25 500.00/hr	125.00
RH	Conference call with House Manager to update on various parts of the case.	0.25 500.00/hr	125.00
RH	Telephone conference with TJ Turner regarding his client.	0.50 500.00/hr	250.00
RH	Telephone conference with witness regarding relevant information about the case.	1.00 500.00/hr	500.00
LMG	Attention to media coverage and publication of factual matters; multiple conferences with Jim Yarbrough regarding witness research.	2.75 500.00/hr	1,375.00

		HRS/RATE	AMOUNT
6/6/2023 ACL	Telephone call regarding case; draft notes regarding call.	0.50 500.00/hr	250.00
SJ	Confer with Rusty Hardin and Jim Yarbrough regarding group email and text logistics and upcoming team meeting; continue to review transcript of hearing and prepare notes of key issues from same.	3.00 200.00/hr	600.00
JY	Work on witness research; multiple conferences with Leah Graham; confer with Rusty Hardin and Stella Jares regarding group email, text logistics, and upcoming team meeting.	3.50 200.00/hr	700.00
KN	Research and create a timeline of Attorney General Kenneth Paxton's impeachment.	1.00 N 100.00/hr	IO CHARGE
ZT	Review social media for Leah Graham; watch press conference; summarize arguments.	3.50 N 50.00/hr	O CHARGE
TS	Review press conference on Kenneth Paxton; research for trial.	3.75 N 50.00/hr	O CHARGE
6/7/2023 RH	Participate in KXAN interview with Dick DeGuerin.	0.75 500.00/hr	375.00
RH	View press conference of Tony Buzbee and Dan Cogdell; draft and edit statement with Daniel Dutko and Leah Graham.	1.50 500.00/hr	750.00
RH	Meeting with impeachment investigative team to discuss evidence and make assignments in preparation for trial.	2.00 500.00/hr	1,000.00
DD	Draft and edit press statement with Rusty Hardin and Leah Graham.	1.00 500.00/hr	500.00
LMG	Begin reviewing and analyzing case documents; strategy meeting with team; review and analyze Ken Paxton's team's press conference; draft	4.75 500.00/hr	2,375.00

		HRS/RATE	AMOUNT
	response to same; multiple telephone calls regarding strategy for dealing with same.		
6/7/2023 LH	Team meeting regarding information gathering; legal research needs, and report on legal research.	2.00 500.00/hr	1,000.00
AD	Attend team meeting; review Tony Buzbee press conference.	2.75 500.00/hr	NO CHARGE
ACL	Attend team meeting relating to case; attention to and listen to hearing.	4.25 500.00/hr	NO CHARGE
SJ	Prepare for and participate in full team meeting to discuss case strategy and division of labor; continue to work on downloading files.	3.50 200.00/hr	700.00
JY	Begin review of interviews; meeting at RHA with Hardin team, DeGuerin team and House investigators.	2.50 200.00/hr	500.00
KN	Review and discuss research for trial with coworkers.	0.75 100.00/hr	NO CHARGE
ММС	Review Tony Buzbee press conference with co-counsel; draft notes regarding same.	0.75 100.00/hr	NO CHARGE
TS	Research for trial.	2.00 50.00/hr	NO CHARGE
KSH	Review Tony Buzbee's press conference; research past Texas impeachments.	4.00 50.00/hr	NO CHARGE
JAG	Review press conference and research media regarding articles of impeachment; research for trial.	2.00 50.00/hr	NO CHARGE
RA	Review Tony Buzbee's press conference; research for trial.	2.50 l 50.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
6/8/2023	RH	Meeting with John MacVane, Armie Lewis, and Jim Yarbrough regarding information provided by third party witness and discussion of how to further research the matter in preparation for trial.	0.50 500.00/hr	250.00
	RH	Interview with source providing information, John MacVane, Armie Lewis, and Jim Yarbrough in preparation for trial.	0.50 500.00/hr	250.00
	RH	Review materials in preparation for trial.	1.00 500.00/hr	500.00
	LMG	Research regarding documents presented during press conference; research Secretary of State for entities relating to Nate Paul.	1.25 500.00/hr	625.00
	JM	Analysis of various issues related to proposed NDA from the Office of the Attorney General and other matters with Lara Hollingsworth; interview with source providing information, Rusty Hardin, Armie Lewis, and Jim Yarbrough in preparation for trial.	1.50 500.00/hr	750.00
	LH	Draft, edit, and research memo on prior Senate procedural rules for impeachment trial.	8.50 500.00/hr	4,250.00
	ACL	Telephone call regarding case; meeting regarding same.	1.50 500.00/hr	750.00
	JY	Work on developing real property ownership details; interview witness; interview with source providing information, Rusty Hardin, Armie Lewis, and John MacVane in preparation for trial.	5.50 200.00/hr	1,100.00
	JAG	Summarize defense claims in press conference and online articles; additional research for trial.	5.00 N 50.00/hr	O CHARGE
	KSH	Research impeachment of Judge Carillo.	3.00 N 50.00/hr	O CHARGE

			HRS/RATE	AMOUNT
6/8/2023	TS	Continue research for trial.	1.00 50.00/hr	NO CHARGE
	RA	Continue research for trial.	5.50 50.00/hr	NO CHARGE
6/9/2023	RH	Telephone conference with House Manager to discuss staffing for trial.	0.25 500.00/hr	125.00
	RH	Telephone conference with Board of Managers lawyer to discuss trial issues.	0.25 500.00/hr	125.00
	JM	Review and analysis of non-disclosure agreement and issues related to same; telephone call with Board of Managers lawyer and Lara Hollingsworth related to same.	1.00 500.00/hr	500.00
	LH	Draft, edit, and research memo regarding prior Senate procedures for impeachment trials and impeachment law; memo to Rusty Hardin for review; telephone conference with impeachment team regarding discussions with Attorney General's office regarding subpoena.	3.25 500.00/hr	1,625.00
	JY	Continue work on real property documentation and send to team.	6.00 200.00/hr	1,200.00
	KSH	Finish report on past impeachments.	3.00 50.00/hr	NO CHARGE
	RA	Continue research for trial.	1.50 50.00/hr	NO CHARGE
	JAG	Continue research for trial.	2.50 50.00/hr	NO CHARGE
6/10/2023	RH	Review materials gathered during investigation in preparation for trial.	4.50 500.00/hr	2,250.00
6/11/2023	RH	Review materials particularly that of the rules committee citing proposed rules from the viewpoint of the house; several telephone	7.00 500.00/hr	3,500.00

		HRS/RATE	AMOUNT
	conferences with Lara Hollingsworth and staff to discuss edits.		
6/11/2023 LH	Research regarding impeachment law and House jurisdiction to issue subpoena; memo regarding same; edit memo on prior Senate procedures for impeachment trials; telephone conference with Rusty Hardin regarding same; telephone conference with Board of Managers lawyer regarding House subpoenas.	7.50 500.00/hr	3,750.00
JY	Review emails from witness.	0.50 200.00/hr	100.00
6/12/2023 RH	Review documents in preparation for trial.	2.00 500.00/hr	1,000.00
RH	Telephone conference with trial team to discuss strategy going forward; telephone conference with House Managers to discuss strategy going forward; review and edit memo to be given to senate committee regarding rules; telephone conference with client and managers; meeting with Lara Hollingsworth regarding edit of memo; telephone conference with entire team to discuss legal issues involved.	7.00 500.00/hr	3,500.00
JM	Conference with Jim Yarbrough regarding witness' emails.	0.25 500.00/hr	125.00
LH	Telephone conference with Jenny Brevorka regarding subpoena issues and trial preparation; edit, research, and circulate memo regarding prior Senate procedure for Senate impeachment trials; meeting with Rusty Hardin regarding same; emails, telephone conferences, and meetings regarding edits.	7.50 500.00/hr	3,750.00
AD	Internet research work with Board of Managers lawyer and documenting ethics commission opinions.	1.00 500.00/hr	500.00
SJ	Prepare for upcoming team meeting; organize resumes and documents of potential experts.	1.00 200.00/hr	200.00

		HRS/RATE AMOUNT
6/12/2023 JY	Conference with Rusty Hardin regarding potential experts; conference with John MacVane regarding assignment to law clerks; conference with law clerks to summarize all of witness' emails; attempts to contact prospective experts.	1.25 250.00 200.00/hr
KN	Prepare evidence chart.	3.25 NO CHARGE 100.00/hr
JH	Compile information about allegations regarding Kenneth Paxton sent to Jim Yarbrough into a chart.	3.75 NO CHARGE 100.00/hr
6/13/2023 JR	Conference with Lara Hollingsworth regarding strategy.	0.25 125.00 500.00/hr
LH	Edits and research to memo regarding prior Senate procedures for impeachment trial; emails with impeachment team regarding same; conference with Joe Roden.	4.50 2,250.00 500.00/hr
AD	Intern assignments; ethics reports assignment for Board of Managers lawyer.	0.50 250.00 500.00/hr
SJ	Upload newly received documents from investigating team; prepare minutes from last week's team meeting and circulate to group; prepare notebook for Rusty Hardin of pleadings and interview memos.	4.75 950.00 200.00/hr
KN	Continue preparing evidence chart.	2.75 NO CHARGE 100.00/hr
MMC	Review emails from witness regarding allegations against Kenneth Paxton; compile all documents with evidence into chart.	2.75 NO CHARGE 100.00/hr
JH	Compiled information about allegations sent to Jim Yarbough about Kenneth Paxton into chart.	4.25 NO CHARGE 100.00/hr

			HRS/RATE	AMOUNT
6/13/2023	RA	Meet with Aisha Dennis regarding research for trial.	1.25 50.00/hr	NO CHARGE
6/14/2023	RH	Review interviews and materials in preparation for trial.	1.00 500.00/hr	500.00
	RH	Attend weekly meeting with litigation team to discuss assignments in preparation for trial.	2.00 500.00/hr	1,000.00
	LMG	Prepare for and attend weekly strategy meeting; continue to review and analyze information obtained during House investigation; monitor media coverage and publication of additional pertinent information; circulate to team for review.	6.00 500.00/hr	3,000.00
	JM	Review rules memorandum and analysis of issues related to same with Lara Hollingsworth.	0.75 500.00/hr	375.00
	LH	Review, edit, and research memo on prior Senate procedures in impeachment trials; meeting with impeachment ream regarding case strategy, legal research issues, and next steps; meeting with Harriet O'Neill regarding case strategy and legal issues.	5.50 500.00/hr	2,750.00
	AD	Team meeting and debrief.	2.00 500.00/hr	NO CHARGE
	ACL	Review House investigation hearing meeting; draft task list.	2.50 500.00/hr	1,250.00
	ACL	Meeting regarding case.	2.00 500.00/hr	NO CHARGE
	SJ	Participate in Zoom meeting with Lara Hollingsworth and addition to team, Harriet O'Neill; prepare for and participate in team meeting; prepare minutes from today's team meeting and circulate to group; forward additional key documents to team.	6.00 200.00/hr	1,200.00

			HRS/RATE	AMOUNT
6/14/2023	JY	Meeting with internal RHA team and House Investigative team; attention to emails; work on identifying experts.	4.00 200.00/hr	800.00
	KN	Continue preparing evidence chart.	5.75 100.00/hr	NO CHARGE
	ММС	Continue working on chart with compiled information regarding the allegations against Kenneth Paxton.	2.00 100.00/hr	NO CHARGE
	JH	Continue compiling allegations regarding Kenneth Paxton into working chart.	2.75 100.00/hr	NO CHARGE
	RA	Meet with Leah Graham regarding research for trial.	0.25 50.00/hr	NO CHARGE
	JAG	Edit document regarding the arguments laid out by defense in press conference video.	2.25 50.00/hr	NO CHARGE
6/15/2023	LMG	Monitor media coverage and publication of additional pertinent information; circulate to team for review.	2.00 500.00/hr	1,000.00
	LH	Meetings with impeachment team; edit, and finalize memo regarding prior Senate procedures in impeachment trials; draft letter response regarding House investigation and subpoena authority; meeting with impeachment team members regarding same.	7.75 500.00/hr	3,875.00
	AD	Media review.	1.25 500.00/hr	NO CHARGE
	ACL	Review House investigation hearing meeting and related materials.	2.00 500.00/hr	1,000.00
	SJ	Upload latest documents received from investigative team via inter-agency requests; confer with Leah Graham regarding preparation of documents for potential production; prepare additional notebooks of witness interview memos and key documents for team members.	5.00 200.00/hr	1,000.00

		HRS/RATE AMOUNT
6/15/2023 JH	Research for trial.	3.00 NO CHARGE 100.00/hr
KSH	Continue researching past impeachments.	3.00 NO CHARGE 50.00/hr
RA	Continue research for trial.	1.00 NO CHARGE 50.00/hr
JAG	Review impeachment proceedings; summarize evidence and arguments made during House hearing on impeachment.	5.00 NO CHARGE 50.00/hr
JBH	Review media; summarize same; review and summarize impeachment procedure from James Ferguson's impeachment trial.	3.00 NO CHARGE 50.00/hr
6/16/2023 RH	Review materials in preparation for trial; conference with Leah Graham regarding response to alleged conflicts of interest.	2.50 1,250.00 500.00/hr
LMG	Continue to review and analyze client documents; attention to issues relating to letter from Stone Hilton regarding alleged conflicts of interest; telephone call with Rusty Hardin to draft and circulate response to same; monitor media coverage and publication of additional pertinent information; circulate to team for review.	5.75 2,875.00 500.00/hr
JM	Research and revisions related to response to Paxton letter on use of subpoenas.	1.00 500.00 500.00/hr
ACL	Review documents regarding property records.	2.00 1,000.00 500.00/hr
SJ	Initial review of latest documents received from investigative team via inter-agency requests; confer with Board of Managers lawyer regarding document sharing platform for team's use; prepare additional key documents for Leah Graham's review; continue preparation of documents for potential production.	5.50 1,100.00 200.00/hr

		HRS/RATE	AMOUNT
6/16/2023 JY	Work on gathering campaign data; attention to emails.	3.00 200.00/hr	600.00
JAG	Continue to summarize evidence and arguments made during House hearing on impeachment.	2.00 50.00/hr	NO CHARGE
JBH	Continue reviewing media; continue review of James Ferguson's impeachment trial and summarize procedure.	1.75 50.00/hr	NO CHARGE
6/17/2023 RH	Review documents and materials in preparation for trial.	3.00 500.00/hr	1,500.00
LH	Review June 15, 2023 Paxton response to memorandum on prior Senate impeachment trial rules; research regarding same; draft response regarding same.	4.25 500.00/hr	2,125.00
6/18/2023 RH	Review documents and materials in preparation for trial.	6.00 500.00/hr	3,000.00
LH	Emails to impeachment team members regarding legal issues and Paxton letters regarding procedure and alleged disqualification issues.	0.50 500.00/hr	250.00
6/19/2023 RH	Review materials in preparation for trial; review of previous statements and voluminous documents gathered in the investigation.	9.50 500.00/hr	4,750.00
SJ	Continue preparation of documents for potential production.	4.00 200.00/hr	800.00
6/20/2023 RH	Review materials in preparation for trial; meeting with Board of Managers lawyers and Jim Yarbrough to discuss results of meeting with forensic examiner; meeting with Lara Hollingsworth and Leah Graham to discuss facts in case and how they work in strategy; review of Senate's press conferences.	6.00 500.00/hr	3,000.00
LMG	Continue to review and analyze client documents; attention to media coverage and publication of additional pertinent information; circulate to team	4.50 500.00/hr	2,250.00

			HRS/RATE	AMOUNT
		for review; review research; attention to pretrial logistics; meeting with Rusty Hardin and Lara Hollingsworth regarding strategy; confer with Bridget Daspit and Stella Jares regarding documents.		
6/20/2023	LH	Telephone conference with Harriet O'Neill regarding legal issues and preparation for potential issues related to impeachment trial; review Senate proceedings regarding procedures for Senate impeachment trial; meeting with Rusty Hardin and Jim Yarbrough regarding strategy.	7.00 500.00/hr	3,500.00
	ACL	Review property records and documents; review articles relating to impeachment.	1.50 500.00/hr	750.00
	SJ	Organize documents for database uploads; multiple conferences with Leah Graham and Bridget Daspit regarding same.	6.50 200.00/hr	1,300.00
	BD	Confer with Stella Jares regarding assistance on database project; work on zipping and renaming files to be loaded to database.	1.00 200.00/hr	200.00
	RA	Review Dan Patrick's press conference.	0.50 50.00/hr	NO CHARGE
	JAG	Review the 1975 Texas Senate impeachment proceedings and summarize the procedures.	1.50 50.00/hr	NO CHARGE
6/21/2023	RH	Meeting with RHA team to prepare for and make assignments for investigation and preparation for trial with Dick DeGuerin; meeting with RHA trial team, Dick DeGuerin, Lisa Hobbs, Harriet O'Neill and House Investigating team to prepare for trial to discuss themes and assign tasks, monitor senate in anticipation of announcement of rules; listen to Senate release of rules; discuss the rules impact on trial; review and discussion of rules with team; telephone conference with House Manager to discuss potential meeting and rules.	10.00 500.00/hr	5,000.00

		HRS/RATE AMOUNT
6/21/2023 DD	Meeting with Rusty Hardin, Jim Yarbrough, Lara Hollingsworth, Leah Graham, Aisha Dennis, Armie Lewis, and outside investigative team regarding case strategy.	3.00 1,500.00 500.00/hr
LH	Research legal issues regarding potential lawsuit; create running list of legal issues and potential motions; review rules issued by Senate; meeting with team regarding impeachment trial issues.	10.25 5,125.00 500.00/hr
LMG	Meeting with Rusty Hardin, Jim Yarbrough, Lara Hollingsworth, Daniel Dutko, Aisha Dennis, Armie Lewis, and outside investigative team regarding case strategy.	3.00 NO CHARGE 500.00/hr
LMG	Continue to review and analyze client documents; monitor media coverage and publication of additional facts and circulate to team for review; attention to legislative announcements and press conference regarding status of Senate rules for trial.	7.50 3,750.00 500.00/hr
ACL	Meeting regarding case strategy with Rusty Hardin, Jim Yarbrough, Lara Hollingsworth, Leah Graham, Daniel Dutko, Aisha Dennis, and outside investigative team.	3.00 NO CHARGE 500.00/hr
ACL	Draft task list.	2.25 1,125.00 500.00/hr
AD	Team meetings regarding strategy, next steps, and assignments.	3.00 NO CHARGE 500.00/hr

		HRS/RATE	AMOUNT
6/21/2023 LBH	Phone conference with legal team to brainstorm potential legal briefing; review and outline House process.	2.50 300.00/hr	750.00
JY	Meeting with House investigators and RHA internal team to discuss going forward.	2.00 200.00/hr	400.00
JY	Meeting with RHA internal team discussing tasks going forward.	3.00 200.00/hr	600.00
TW	Review media.	2.50 50.00/hr	NO CHARGE
JAG	Continue reviewing the 1975 Texas Senate impeachment proceedings and summarize the procedures.	1.00 50.00/hr	NO CHARGE
6/22/2023 RH	Review documents, including recently announced roles; telephone conference with Dick DeGuerin to discuss same; further review of documents relevant to the new rules.	3.00 500.00/hr	1,500.00
LH	Calendar deadlines; review newly issued Senate rules; telephone conference with Jenny Brevorka regarding potential motions and legal issues presented by impeachment trial and new rules; draft running list of legal issues and motions.	2.50 500.00/hr	1,250.00
RKI	Review correspondence from Jim Yarbrough regarding expert; draft expert engagement letter.	1.00 500.00/hr	500.00
JB	Telephone conference with Lara Hollingsworth regarding potential motions and legal issues presented by impeachment trial and new rules.	1.00 500.00/hr	500.00
LBH	Continue outlining House process and complaints; research issue related to same; study Senate rules and outline potential issues with rules in anticipation of motion to clarify.	7.75 300.00/hr	2,325.00
JH	Review Senate rules for Kenneth Paxton's impeachment trial.	0.25 100.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
6/22/2023	TW	Continue reviewing media.	0.50 50.00/hr	NO CHARGE
6/23/2023	RH	Interview with potential witness and Armie Lewis to discuss the possibility of her being a witness at trial.	0.50 500.00/hr	250.00
	RH	Meeting with Dick DeGuerin, Leah Graham, Jenny Brevorka, Aisha Dennis, Armie Lewis, and Jim Yarbrough.	1.50 500.00/hr	750.00
	RH	Review rules; meeting with RHA team to update in preparation for 10:00 call with larger group; meeting with RHA team, Dick DeGuerin, investigating staff, House Managers, Harriet O'Neill, Lisa Hobbs, and Jenny Brevorka to discuss significance in case of various portions of rules and to get team consensus on their meaning.	3.50 500.00/hr	1,750.00
	LH	Zoom meeting with trial team, including potential legal issues and motions.	1.50 500.00/hr	750.00
	LMG	Prepare for and attend meeting regarding Senate rules and strategy going forward; continue to review and analyze client documents; monitor media coverage and publication of additional pertinent information; circulate to team for review.	7.50 500.00/hr	3,750.00
	JB	Meeting with Aisha Dennis, Leah Graham, Rusty Hardin, Jim Yarbrough, Armie Lewis, and outside investigative team regarding case strategy and Senate rules.	1.50 500.00/hr	750.00
	ACL	Meeting with Aisha Dennis, Jenny Brevorka, Leah Graham, Rusty Hardin, Jim Yarbrough, and outside investigative team regarding case strategy and senate rules (No Charge); draft task list.	1.50 500.00/hr	NO CHARGE
	ACL	Meeting with Aisha Dennis, Jenny Brevorka, Leah Graham, Rusty Hardin, Jim Yarbrough, and outside investigative team regarding case strategy and senate rules (No Charge); draft task list.	0.75 500.00/hr	375.00

			HRS/RATE	AMOUNT
6/23/2023	AD.	Meeting regarding Senate rules.	2.00 500.00/hr	NO CHARGE
	LBH	Continue outlining and research issues related to House process.	2.75 300.00/hr	825.00
	JY	Attend meeting with RHA internal, House investigators, and Dick DeGuerin; work on real property information.	6.00 200.00/hr	1,200.00
	JH	Attend team meeting to go over the Senate rules for the Kenneth Paxton trial; review case documents to prepare for an assignment.	2.25 100.00/hr	NO CHARGE
	TW	Continue monitoring media and drafting notes on meeting.	5.50 50.00/hr	NO CHARGE
	ZT	Participate in Zoom meeting.	2.00 50.00/hr	NO CHARGE
	TS	Attend meeting regarding Kenneth Paxton's impeachment.	1.50 50.00/hr	NO CHARGE
	JAG	Attend impeachment trial meeting and continue reviewing the 1975 Texas Senate impeachment proceedings and summarize the procedures.	4.00 50.00/hr	NO CHARGE
	JBH	Review James Ferguson impeachment trial; attend team meeting.	4.75 50.00/hr	NO CHARGE
6/24/2023	RH	Review materials developed in the investigation in preparation for trial.	3.00 500.00/hr	1,500.00
	LH	Finalize and email running list of potential legal issues and motions.	0.75 500.00/hr	375.00
	LMG	Monitor media coverage and publication of additional pertinent information; circulate to team for review.	2.50 500.00/hr	1,250.00
6/25/2023	RH	Review materials developed in investigation in preparation for trial.	4.00 500.00/hr	2,000.00
	CD	Initial telephone call with House Manager on ethics issues.	0.50 500.00/hr	250.00

		HRS/RATE	AMOUNT
6/25/2023 LMG	Monitor media coverage and publication of additional pertinent information; circulate to team for review.	1.50 500.00/hr	750.00
6/26/2023 RH	Telephone conference with corroborating witness.	0.50 500.00/hr	250.00
RH	Telephone conference with Jenny Brevorka to discuss case and scheduling; telephone conference with House Managers to discuss possible retention of experts; confer with Jim Yarbrough and Armie Lewis.	0.75 500.00/hr	375.00
RH	Telephone conference with Jenny Brevorka to discuss meeting with Armie Lewis and Jim Yarbrough regarding agenda items.	0.25 500.00/hr	125.00
JB	Telephone conference with Rusty Hardin regarding case and scheduling; telephone call with Lara Hollingsworth regarding impeachment, legal, and subpoena issues.	1.50 500.00/hr	750.00
LH	Call with Jenny Brevorka regarding impeachment legal issues; research regarding subpoena issues; telephone conference with Lisa Hobbs regarding legal issues and assignment of projects.	5.50 500.00/hr	2,750.00
LMG	Continue to review and analyze client documents; attention to media coverage and publication of additional pertinent information; circulate to team for review.	2.00 500.00/hr	1,000.00
AD	Review assignment from Jodie Aguirre; discussion of OAG document review with Jodie Aguirre and Kenneth Spivey.	1.00 500.00/hr	NO CHARGE
ACL	Meeting with Rusty Hardin and Jim Yarbrough; draft task list.	0.25 500.00/hr	125.00
LBH	Prepare for and participate in phone conference with legal team.	0.75 300.00/hr	225.00
CD	Initial telephone call with counsel to discuss collaborating on motions and ethics research.	0.50 500.00/hr	250.00

		HRS/RATE	AMOUNT
6/26/2023 JY	Meeting with Rusty Hardin and Armie Lewis regarding upcoming agenda items; work on real property research and Texas Secretary of State records.	8.25 200.00/hr	1,650.00
TW	Continued reviewing media and conduct research for trial; summarize research.	4.25 50.00/hr	NO CHARGE
JAG	Draft timeline summary.	6.50 50.00/hr	NO CHARGE
JBH	Review James Ferguson's impeachment trial procedure.	4.00 50.00/hr	NO CHARGE
6/27/2023 RH	Review contract for hotel lodging during trial.	0.25 500.00/hr	NO CHARGE
RH	Meeting with RHA team, investigation team, and Dick DeGuerin to assign duties and plans for each person; respond to emails; meeting afterwards with Lara Hollingsworth to discuss legal issues the appellate group is working on; review of documents.	3.00 500.00/hr	1,500.00
JB	Meeting with Leah Graham and Armie Lewis regarding impeachment document review and tasks; meeting with Rusty Hardin, Leah Graham, Armie Lewis, Board of Managers lawyers, and Dick DeGuerin regarding document issues and witnesses; telephone call with Armie Lewis regarding scheduling of interviews.	3.00 500.00/hr	1,500.00
LMG	Telephone call regarding status of case, strategy going forward, and organization and delegation of tasks and labor; attention to media coverage and publication of additional pertinent information; circulate to team for review; continue to review and analyze information obtained during investigation and prepare attorney work product relating to same; meeting with Lara Hollingsworth and Jenny Brevorka regarding impeachment	6.00 500.00/hr	3,000.00

		HRS/RATE	AMOUNT
	document review and tasks; conferences with Bridget Daspit regarding database.		
6/27/2023 LH	Meeting with RHA team; meeting afterwards with Rusty Hardin regarding appellate issues; prepare potential legal issues memo; review and research issues regarding document collection pre-trial; review and research law regarding immunity.	6.00 500.00/hr	3,000.00
ACL	Meeting with Jenny Brevorka and Leah Graham regarding impeachment document review and tasks; meeting with Rusty Hardin, Jenny Brevorka, Leah Graham, Board of Managers lawyers, and Dick DeGuerin regarding document issues and witnesses; telephone call with Jenny Brevorka regarding scheduling of interviews.	3.00 500.00/hr	1,500.00
LBH	Research legal issues in anticipated motion, including prior impeachment trials.	5.50 300.00/hr	1,650.00
BD	Confer with Leah Graham regarding loading documents into database; begin the ingest of documents into database; various emails with Leah Graham regarding status; communications with tech support.	6.25 200.00/hr	1,250.00
JY	Work on real property research.	5.00 200.00/hr	1,000.00
TW	Review relevant records for trial.	4.75 50.00/hr	NO CHARGE
JAG	Draft timeline summary and discuss findings with Aisha Dennis.	6.50 50.00/hr	NO CHARGE
JBH	Continue reviewing James Ferguson's impeachment trial procedure.	1.50 50.00/hr	NO CHARGE
6/28/2023 RH	Telephone conference with appellate attorney to discuss issues.	0.25 500.00/hr	125.00

			HRS/RATE	AMOUNT
6/28/2023	RH	Meeting with potential witness.	0.50 500.00/hr	250.00
	RH	Meeting with Leah Graham, Armie Lewis, and Jim Yarbrough regarding House Managers meeting.	0.50 500.00/hr	250.00
	LH	Research and draft subpoena forms; telephone conference with House Managers lawyer regarding same.	3.00 500.00/hr	1,500.00
	LMG	Continue to review and analyze client documents; prepare attorney work product relating to same; attention to media coverage and publication of additional pertinent information; circulate to team for review; attention to issues relating to logistics of document review; meeting with Rusty Hardin, Armie Lewis, and Jim Yarbrough regarding House Managers meeting.	7.50 500.00/hr	3,750.00
	ACL	Draft calendar for scheduling interviews; draft task list; draft outline regarding House Managers meeting; meeting with Jim Yarbrough, Leah Graham, and Rusty Hardin regarding House Managers meeting.	5.25 500.00/hr	2,625.00
	AD	Debrief with interns on document findings.	0.25 500.00/hr	125.00
	BD	Confer with DISCO customer service regarding documents ingested into database; continue work on ingesting documents into DISCO database; confer with Leah Graham regarding same; review ingest reports; confirm documents uploaded were ingested; various emails with DISCO; multiple telephone conferences with DISCO support tech regarding documents.	4.00 200.00/hr	800.00
	JY	Meeting with Rusty Hardin, Leah Graham, and Armie Lewis regarding House Managers meeting; draft memo for team on real property ownership.	7.00 200.00/hr	1,400.00
	ZT	Scanned documents for Jim Yarbrough's file.	0.50 N 50.00/hr	O CHARGE
	CD	Legal research and draft initial memo outline.	3.50 500.00/hr	1,750.00

		HRS/RATE	AMOUNT
6/28/2023 JAG	Draft timeline summary and discuss findings with Aisha Dennis.	7.00 50.00/hr	NO CHARGE
6/29/2023 RH	Travel to and from Austin with Leah Graham, Armie Lewis, and Jim Yarbrough to meet with House Managers meeting to update client and discuss strategy going forward; telephone conference afterwards with House Managers.	12.00 500.00/hr	6,000.00
LH	Attend Zoom meeting with House Managers regarding trial issues.	1.50 500.00/hr	NO CHARGE
LMG	Continue to review and analyze client documents; travel to and from Austin for meeting with House Managers.	12.00 500.00/hr	6,000.00
ACL	Travel to Austin for meeting; telephone call with potential impeachment expert with Jim Yarbrough, Rusty Hardin, and Leah Graham; review documents to prepare for House Managers meeting; meeting with Jim Yarbrough, Leah Graham, Rusty Hardin, and House Managers.	12.00 500.00/hr	6,000.00
BD	Conferences with Stella Jares regarding database uploads.	0.50 200.00/hr	100.00
SJ	Continue to organize documents for database uploads; conferences with Bridget Daspit regarding same; research campaign finance report filings and disseminate same to team.	3.00 200.00/hr	600.00
BD	Continue work on ingesting documents into DISCO database; confer with Leah Graham regarding same; confer with DISCO help desk; work in database.	4.00 200.00/hr	800.00
JY	Travel to Austin with Rusty Hardin, Armie Lewis and Leah Graham to meet with House Managers; review witness memo and locate potential witnesses.	11.00 200.00/hr	2,200.00

		HRS/RATE	AMOUNT
6/29/2023 JAG	Draft timeline summary.	6.00 50.00/hr	NO CHARGE
JBH	Continue reviewing James Ferguson's impeachment trial procedure.	3.00 50.00/hr	NO CHARGE
6/30/2023 RH	Telephone conference with Ross Garber to arrange meeting next week; review documents in preparation for trial.	3.25 500.00/hr	1,625.00
RH	Meeting with Stella Jares regarding logistics; review, edit and finalize memo with Lara Hollingsworth; review draft letter response regarding House investigation and subpoena authority.	4.00 500.00/hr	2,000.00
JB	Telephone call with Armie Lewis regarding update of meeting with House Managers on June 29th; conference with Stella Jares regarding hearing logistics.	0.50 500.00/hr	250.00
DD	Strategy conference with Leah Graham and Lara Hollingsworth.	1.00 500.00/hr	500.00
LH	Edit running list of legal issues; research regarding immunity and right of cross examination; strategy meeting with Leah Graham and Daniel Dutko.	3.50 500.00/hr	1,750.00
LMG	Continue to review and analyze client documents; attention to issues relating to pretrial motions, including motion for no-evidence summary judgment (or something similar) and issues relating to same; strategy conference with Lara Hollingsworth and Daniel Dutko regarding same; conference with Stella Jares regarding previous day's meeting with House Managers.	3.50 500.00/hr	1,750.00
ACL	Review witness interview and prepare for witness interview; draft witness list and contact information; telephone call with Jenny Brevorka regarding update of meeting with House Managers on June 29th; telephone call with Board of Managers lawyer, Dick DeGuerin, Jim Yarbrough, and	7.25 500.00/hr	3,625.00

		HRS/RATE	AMOUNT
	witness; draft email regarding interview of one of the witnesses.		
6/30/2023 LBH	Review list of potential joint motions and give feedback.	0.75 300.00/hr	225.00
SJ	Continue to work on issues regarding database setup; conference with Leah Graham regarding previous day's meeting with House members; conference with Jenny Brevorka regarding hearing logistics; update team calendar with upcoming witness interview dates; meeting with Rusty Hardin to discuss hearing logistics; review additional recently received documents.	5.00 200.00/hr	1,000.00
JY	Telephone conference with Board of Managers lawyer, Dick DeGuerin, Armie Lewis, and witness; begin work and review of The Esther Blind Trust; work on property ownership homestead information.	5.00 200.00/hr	1,000.00
JAC	Continue drafting timeline summary.	7.00 N 50.00/hr	NO CHARGE
JBł	Continue reviewing James Ferguson's impeachment trial procedure.	3.00 N 50.00/hr	NO CHARGE
Tota	al Legal Fees This Invoice	777.75	\$237,550.00
EXI	PENSES		
5/28/2023 RH	AT&T Teleconference Service Amex 07/23		98.63
5/31/2023 SM	In-house copies - May 2023 337 black and white copies @ \$0.10 per copy		33.70

		AMOUNT
6/1/2023 RH	Transportation from residence to Hobby Airport Genesis Corporate Transportation #24861 (Fare discounted to be comparable to Uber) Amex 06/23	28.00
RH	Transportation from Hobby Airport to residence Genesis Corporate Transportation #24862 (Fare discounted to be comparable to Uber) Amex 06/23	28.00
RH	Transportation in Austin Taxi Airport Amex 06/23	74.40
RH	Airfare - Round trip Houston (Hobby) to Austin Southwest Airlines #5262459956040 Amex 06/23	500.00
6/7/2023 RH	Parking at RH&A for Board of Managers lawyer for pretrial meeting	15.00
RH	Parking at RH&A for Board of Managers staff for pretrial meeting	15.00
6/8/2023 JY	Online Research - Find/Find by Global People Name Cupertino Builders/sagiraju Office of the Secretary of State #125500450 Amex 07/23	2.00
6/9/2023 JY	Online Research - Find by Global People Name Witness (San Antonio, TX) Office of the Secretary of State #125551344 Amex 07/23	1.00
JY	Property History Report CourthouseDirect.com #866760 Amex 07/23	5.33
JY	Property History Report Courthouse Direct.com #866761 Amex 07/23	5.33
JY	Property History Report Courthouse Direct.com #866762 Amex 07/23	5.33

		AMOUNT
6/9/2023 JY	Property History Report CourthouseDirect.com #866763 Amex 07/23	5.33
JY	Property History Report Courthouse Direct.com #866764 Amex 07/23	5.33
JY	Property History Report Courthouse Direct.com #866765 Amex 07/23	5.33
6/14/2023 RH	Parking at RH&A for Board of Managers lawyer for pretrial meeting	15.00
JY	Land and property records Real property research TexasFile LLC #6767339 Amex 07/23	49.25
6/16/2023 SJ	Tech Time - Merging PDFs OCR - Searchable Text FLIP Document Services #5994 Amex 07/23	241.12
6/20/2023 RH	Parking at RH&A - Board of Managers lawyer for pretrial meeting	15.00
6/21/2023 RH	Parking at RH&A - Dick DeGuerin for pretrial meeting	15.00
RH	Parking at RH&A - Board of Managers lawyer for pretrial meeting	20.00
LMG	Rush Transcription - Expedited Interview of Witness Infinity Reporting Group, LLC #22496 Amex 08/23	1,245.00
LMG	Rush Transcriptions - Overnight and 2-5 Days Expedited Interviews of Witness 1, Witness 2, Witness 3, Witness 4, Witness 5, Witness 6, Witness 7, Witness 8, and Witness 9 Infinity Reporting Group, LLC #22460 Amex 08/23	11,569.80
6/23/2023 RH	Parking at RH&A for pretrial meeting	15.00

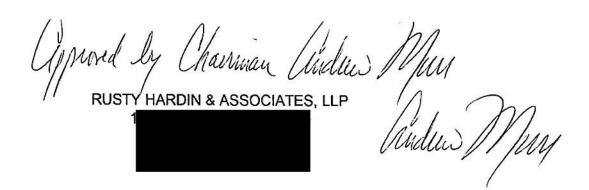
		AMOUNT
6/26/2023 JY	Online Research - Find by Global People Name W Kenneth Paxton Office of the Secretary of State #126119665 Amex 07/23	1.00
JY	Property Profile Report CourthouseDirect.com #867864 Amex 07/23	3.19
JY	Online Research - Find/Find by Global People Name Esther Blind Trust, The Esther Blind Trust, S3 Sleep Investments, DNG Holdings, and W Kenneth Paxton Office of the Secretary of State #126116363 Amex 07/23	5.00
6/27/2023 RH	Parking at RH&A for Dick DeGuerin for pretrial meeting	15.00
JY	Online Research - Find Name prlap inc Office of the Secretary of State #126166324 Amex 07/23	1.00
JY	Document Images (Weber-2021.3165879 - Session 8) CourthouseDirect.com #867999 Amex 07/23	5.59
6/28/2023 JY	Online Research - Web Inquiry Sundance at Brushy Creek Office of the Secretary of State #126214113 Amex 07/23	1.00
JY	Online Research - Find/Find Global Blind Esther Trust, Sundance Memory Care, Sundance Brushy Creek, Sundance at Brushy Creek, and Sundance Office of the Secretary of State #126214128	7.00
JY	Subscription OKCountyRecords.com #1177763 VISA 07/23	10.00
6/29/2023 RH	Toll Fees Fort Bend Grand Parkway Toll Road Authority Harris County Toll Road Authority (July Statement)	1.58

		AMOUNT
6/29/2023 RH	Toll Fees Harris County Toll Road Authority (June Statement)	4.90
JY	Round-trip mileage to Austin 275 miles @ \$0.655 per mile plus tolls \$6.64 Jim Yarbrough Expense Report	186.77
JY	Parking - Meeting with House Manager at Capitol Visitors Parking Garage Amex 07/23	4.00
6/30/2023 RH	AT&T Teleconferences (4) - June 2023 Amex 08/2023	192.34
JM	Westlaw Charges for June 9 and 16, 2023 Amex 08/23	37.24
LH	Westlaw Charges for June 2023 Amex 08/23	565.46
LMG	Westlaw Charges for June 19-21, 2023 Amex 08/23	379.16
JY	Online Research TransUnion - TLO Charges for June 2023 Amex 07/2023	399.75
JY	PACER Charges - June 8, 2023	0.10
JY	Online Research - June 2023 IDI #IN520367	81.02
JY	Land and property records TexasFile LLC Amex 07/23	105.54
SM	In-House Copies - June 2023 214 black and white copies @ \$0.10 per copy 33 color copies @ \$0.50 per copy	37.90
Total	Expenses	\$16,057.42
Total	Fees and Expenses this Invoice	\$253,607.42

AMOUNT

Time also assess	_
Timekeeper	Summarv

Timekeeper Summary			
Name	HOURS	RATE	AMOUNT
Rusty Hardin	140.00	500.00	\$70,000.00
Rusty Hardin	0.75	0.00	\$0.00
Daniel Dutko	5.00	500.00	\$2,500.00
Jennifer Brevorka	7.50	500.00	\$3,750.00
Joe Roden	0.25	500.00	\$125.00
Joe Roden	0.50	0.00	\$0.00
John MacVane	4.50	500.00	\$2,250.00
Lara Hollingsworth	109.75	500.00	\$54,875.00
Lara Hollingsworth	2.00	0.00	\$0.00
Leah Graham	83.00	500.00	\$41,500.00
Leah Graham	3.00	0.00	\$0.00
Ryan Higgins	1.00	500.00	\$500.00
Ryan Higgins	3.00	0.00	\$0.00
Terry Kernell	2.00	0.00	\$0.00
Aisha Dennis	7.25	500.00	\$3,625.00
Aisha Dennis	13.00	0.00	\$0.00
Armstead Lewis	41.75	500.00	\$20,875.00
Armstead Lewis	10.75	0.00	\$0.00
Claude Ducloux	4.50	500.00	\$2,250.00
Lisa Hobbs	20.00	300.00	\$6,000.00
Bridget A. Daspit	15.75	200.00	\$3,150.00
Stella Jares	50.75	200.00	\$10,150.00
Jim Yarbrough	80.00	200.00	\$16,000.00
Jordan Harkins	16.25	0.00	\$0.00
Kensington Nulf	13.50	0.00	\$0.00
Molly McNamara	5.50	0.00	\$0.00
James Beck	21.00	0.00	\$0.00
Hollingsworth Jodie	58.25	0.00	\$0.00
Aguirre	13.00	0.00	\$0.00
Kevel Shah	12.50	0.00	\$0.00
Rodrigo Amare	17.50	0.00	\$0.00
Tanner Watson	8.25	0.00	\$0.00
Thomas Smith	6.00	0.00	\$0.00
Zoey Taylor			•



Texas House of Representatives Board of Managers Chairman Andrew Murr, House Board of Managers

ATTN: Logan Harrison

P. O. Box 2910, Room E1.308

Austin, TX 78768

Fed Tax ID#76-0518681 Invoice # 23388 Client/Matter No. 3655.01 -Impeachment November 20, 2023

In Reference To: Impeachment Proceedings of

Texas Attorney General Warren Kenneth Paxton, Jr.

STATEMENT

LEGAL FEES

<u>LLO</u>	AL I LLO		
		HRS/RATE	AMOUNT
9/1/2023 RH	Review materials on witnesses in preparation for interviews; attendance at interviews of witnesses.	10.00 500.00/hr	5,000.00
LH	Meeting with House counsel, Board of Managers lawyer, and Ross Garber regarding legislative privilege; review of materials regarding Paxton's alleged experts; review of Texas Supreme Court dissent to denial Petition for Review from third party suit attacking impeachment rules; research draft opening statement; emails regarding preparation of legal issues for trial.	10.50 500.00/hr	5,250.00

RECEIVED

NOV 2 8 2023

ACCOUNTING HOUSE OF REPRESENTATIVES

			HRS/RATE	AMOUNT
9/1/2023	МСМ	Travel to Austin for trial; coordinate with House Managers' office to obtain security clearance; conduct analysis regarding overlapping exhibits for pre-admission; confer with Aisha Dennis regarding same; attend meeting regarding opening statement; confer with Leah Graham regarding exhibits.	7.25 500.00/hr	3,625.00
	LMG	Prepare for trial.	17.25 500.00/hr	8,625.00
	DD	Attend witness interview.	3.50 500.00/hr	1,750.00
	JB	Participate in witness trial preparations; review materials from subpoena production; correspondence with counsel for witness about their review of materials; review exhibit list; review and assemble materials for attorney use at trial; confer with team members about trial preparations; direct Stacey Manela on revisions to demonstrative for trial; meet and confer with court reporter about trial matters.	13.25 500.00/hr	6,625.00
	ACL	Draft notes for trial preparation of multiple witnesses.	15.75 500.00/hr	7,875.00
	AD	Review pre-admitted exhibits.	6.00 500.00/hr	3,000.00
	AD	Media monitoring.	0.75 500.00/hr	NO CHARGE
	RG	Trial preparation; conference with co-counsel.	5.50 500.00/hr	2,750.00
	LBH	Research past impeachments in preparation for trial; research issues on suspension of Senate Rules; review Justice Devine's dissent on Senator	6.50 300.00/hr	1,950.00

		HRS/RATE	AMOUNT
	Paxton recusal and consider its implication on trial procedure.		
9/1/2023 SJ	Continue to prepare documents for attorney use at trial; continue to review documents and identify additional trial exhibits; prepare trial notebooks for team members.	12.50 200.00/hr	2,500.00
JY	Trial preparation.	10.50 200.00/hr	2,100.00
9/2/2023 RH	Review documents of witnesses in preparation of presenting them at trial.	10.50 500.00/hr	5,250.00
LH	Research in support of legal response trial preparation; draft opening statement; meeting with trial team regarding opening statement; emails and edits regarding opening statement; prepare legal briefs for trial usage.	9.00 500.00/hr	4,500.00
МСМ	Prepare for trial, including analyzing exhibits for overlap for preadmission; confer with trial team regarding same; attend meeting regarding opening statement and privilege issues; work with Aisha Dennis to finalize preliminary overlap list of trial exhibits for preadmission.	14.25 500.00/hr	7,125.00
JB	Prepare for trial.	14.00 500.00/hr	7,000.00
DD	Attend meeting regarding opening statement; prepare trial outline for multiple witnesses.	8.50 500.00/hr	4,250.00
LMG	Prepare for trial.	13.50 500.00/hr	6,750.00
ACL	Witness preparation and draft notes regarding same; meeting regarding strategy for opening with trial team; compile documents related to another witness.	16.25 500.00/hr	8,125.00

			HRS/RATE	AMOUNT
9/2/2023	AD .	Assist trial team; prepare documents for attorney use at trial; prepare for AG expert meeting; team meeting; discuss AG experts with Ross Garber; review opening statement; update motions scorecard; exhibit comparison.	5.00 500.00/hr	2,500.00
	AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
	RG	Trial preparation; conference with co-counsel.	6.50 500.00/hr	3,250.00
	LBH	Conduct follow-up research on legal issues and advise trial team accordingly.	3.25 300.00/hr	975.00
	SJ	Continue to assist attorneys with preparation of documents for use at trial and trial exhibits.	12.50 200.00/hr	2,500.00
	JY	Trial preparation.	12.25 200.00/hr	2,450.00
9/3/2023	RH	Interview of witness; review of previous interviews of witnesses; review of documents in preparation for trial; meeting with Lara Hollingsworth and Daniel Dutko regarding opening statement.	11.00 500.00/hr	5,500.00
	LH	Draft and edit opening statement; draft motion regarding removal and disqualification; email to House Managers regarding opening statement; preparation of trial materials, regarding attorney-client privilege; meeting with Rusty Hardin and Daniel Dutko regarding opening statement.	13.25 500.00/hr	6,625.00
	MCM	Continue preparing for trial, including analysis of overlap exhibits, research and draft legal standard on offensive use and selective waiver, pull documents for attorney use in witness preparation, and review and revise motion to continue trial if Paxton resigns.	9.50 500.00/hr	4,750.00

			HRS/RATE	AMOUNT
9/3/2023	JB	Trial preparation.	12.00 500.00/hr	6,000.00
	LMG	Prepare for trial.	14.00 500.00/hr	7,000.00
	DD	Attend interview of witness; prepare outline of opening statement; attend meeting with Rusty Hardin and Lara Hollingsworth regarding opening statement.	8.00 500.00/hr	4,000.00
	ACL	Attend interview of two witnesses and draft notes regarding same; meeting with Stacy Manela regarding demonstrative organizational chart revisions; meeting regarding trial witnesses.	15.25 500.00/hr	7,625.00
	AD	Assist trial team; review opening; update motions scorecard; exhibit comparison.	9.00 500.00/hr	4,500.00
	AD	Media monitoring.	0.75 500.00/hr	NO CHARGE
	RG	Trial preparation; conference with co-counsel.	5.00 500.00/hr	2,500.00
	LBH	Conduct follow-up research on legal issues and advise trial team accordingly.	2.50 300.00/hr	750.00
	SJ	Continue to assist attorneys with preparation of documents for use at trial and trial exhibits.	8.75 200.00/hr	1,750.00
	JY	Trial preparation.	9.50 200.00/hr	1,900.00
9/4/2023	RH	Review of materials in preparation for the testimony of several witnesses; review proposed opening statement; meeting with Lara Hollingsworth to go over proposed draft of opening statement; attend and conduct interview of another witness.	13.00 500.00/hr	6,500.00

			HRS/RATE	AMOUNT
9/4/2023	LH	Research, draft, and edit opening statement; meeting with House Manager regarding opening statement; emails regarding same; preparation of legal materials for trial; meeting with Daniel Dutko and Leah Graham regarding edits to opening statement.	10.75 500.00/hr	5,375.00
	МСМ	Prepare for trial, including analysis of exhibits, particularly for overlapping HBOM and AG exhibits for cross-referencing purposes; revise, finalize, and attention to serving HBOM second amended exhibit list; revise, finalize, and attention to serving HBOM third amended exhibit list; draft summary of argument in support of compelling Paxton to testify.	13.25 500.00/hr	6,625.00
	JB	Trial preparation.	15.50 500.00/hr	7,750.00
	LMG	Prepare for trial.	18.00 500.00/hr	9,000.00
	DD	Attend interview with witness; attend meeting regarding opening statement.	5.50 500.00/hr	2,750.00
	ACL	Prepare for witness meeting; meet with Rusty Hardin and Jenny Brevorka regarding witness direct examination and strategy; draft outline for witness direct examination.	16.25 500.00/hr	8,125.00
	AD	Review opening; update motions scorecard; exhibit comparison; prepare for trial.	12.00 500.00/hr	6,000.00
	AD	Media monitoring.	0.75 500.00/hr	NO CHARGE
	RG	Trial preparation; conference with co-counsel.	8.00 500.00/hr	4,000.00
	LBH	Conduct follow-up research on legal issues and advise trial team accordingly.	5.00 300.00/hr	1,500.00

			HRS/RATE	AMOUNT
9/4/2023	SJ	Continue general trial preparations; participate in second walk though in the Senate, including working with court reporters regarding real time and Senate staff regarding presentation of evidence.	12.00 200.00/hr	2,400.00
	JY	Trial preparation.	12.25 200.00/hr	2,450.00
9/5/2023	RH	Attendance at first day of trial; preparation for the next day of trial.	15.00 500.00/hr	7,500.00
	LH	Attend trial; prepare trial brief on privilege; research regarding same.	11.50 500.00/hr	5,750.00
	MCM	Attend trial day 1; attention to admitted exhibits and update team regarding same; review Lewis Brisbois report to gather examples of subject matter waiver; prepare for trial day 2.	14.00 500.00/hr	7,000.00
	JB	Attend and participate in trial; prepare for the next day of trial.	15.00 500.00/hr	7,500.00
	LMG	Prepare for and attend trial; prepare for the next day of trial.	16.75 500.00/hr	8,375.00
	DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	13.00 500.00/hr	6,500.00
z	ACL	Attend trial; draft outline for direct examination of witnesses; meeting with Rusty Hardin and Jenny Brevorka about direct examination outlines.	15.00 500.00/hr	7,500.00
9	AD	Attend trial; prepare for the next day of trial.	15.50 500.00/hr	7,750.00
	RG	Trial; evaluate legal issues.	9.25 500.00/hr	4,625.00

			HRS/RATE	AMOUNT
9/5/2023	LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict; assist in drafting and finalizing trial bench on privilege issues.	17.25 300.00/hr	5,175.00
	SJ	Participate in trial and assist trial attorneys to prepare for next day's witnesses.	18.00 200.00/hr	3,600.00
	JY	Attend trial and witness preparation; meetings after trial with team.	12.00 200.00/hr	2,400.00
	KN	Media reporting (Twitter).	3.00 50.00/hr	NO CHARGE
9/6/2023	RH	Attendance at 2nd day of trial; preparation for next day; review of exhibits and preparation for presentation of witnesses.	14.50 500.00/hr	7,250.00
	LH	Attend trial and prepare for next day of trial; research evidentiary issues.	9.50 500.00/hr	4,750.00
	МСМ	Attend trial day 2; prepare for trial day 3, including attention to admitted exhibits and updating team regarding same, revising and finalizing HBOM's fourth amended exhibit list, and updating exhibit lists with analysis of admitted exhibits used on direct, cross, and redirect examination.	12.50 500.00/hr	6,250.00
	JB	Participate in trial; prepare for next day of trial.	14.00 500.00/hr	7,000.00
	LMG	Prepare for and attend trial; prepare for next day of trial.	15.00 500.00/hr	7,500.00
	DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	13.00 500.00/hr	6,500.00
	ES	Communicate with Jenny Brevorka regarding coordination of trial transcript summary project; communicate with Kylee Nichols regarding trial transcript project; review and revise trial transcript	1.75 500.00/hr	875.00

			HRS/RATE	AMOUNT
		summaries; communicate with Jenny Brevorka regarding initial draft of transcript summaries.		
9/6/2023	ACL	Participate in trial; prepare for trial the next day, including drafting outlines for direct examination of multiple trial witnesses.	14.50 500.00/hr	7,250.00
	AD	Attend trial; prepare for trial the next day.	13.25 500.00/hr	6,625.00
	LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict.	10.50 300.00/hr	3,150.00
	RG	Trial; conference with co-counsel; evaluate legal issues.	10.00 500.00/hr	5,000.00
	SJ	Participate in trial and assist trial attorneys to prepare for next day's witnesses.	12.00 200.00/hr	2,400.00
	JY	Attend trial and review discovery.	11.00 200.00/hr	2,200.00
	KN	Media reporting (Twitter); summarize opening statement and witness testimony.	12.00 50.00/hr	NO CHARGE
9/7/2023	RH	Attendance at trial; preparation for next day.	15.50 500.00/hr	7,750.00
	LH	Attend trial and prepare for next day of trial; review trial transcripts; research regarding evidentiary issues.	10.25 500.00/hr	5,125.00
	МСМ	Attend trial day 3; prepare for trial day 4, including attention to admitted exhibits and updating team regarding same, reviewing amended AG exhibit lists, revising HBOM's fifth amended exhibit list, analyzing bankruptcy filings of Nate Paul entities, and gathering orders of dismissal.	10.25 500.00/hr	5,125.00
	JB	Attend trial; prepare for next day of trial.	14.50 500.00/hr	7,250.00

		HRS/RATE	AMOUNT
9/7/2023 DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	13.00 500.00/hr	6,500.00
LMG	Prepare for and attend trial; prepare for next day of trial.	14.25 500.00/hr	7,125.00
ES	Communicate with Kylee Nichols and Elvira Barajas regarding trial transcript summary project.	0.50 500.00/hr	NO CHARGE
ACL	Participate in trial; witness preparation; meeting with Rusty Hardin, Jenny Brevorka, and Jim Yarbrough regarding redirect examination.	15.75 500.00/hr	7,875.00
AD	Attend trial; prepare for the next day of trial.	12.00 500.00/hr	6,000.00
RG	Trial; attention to strategy; evaluate legal issues.	5.00 500.00/hr	2,500.00
LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict.	7.75 300.00/hr	2,325.00
SJ	Participate in trial and assist trial attorneys to prepare for next day's witnesses.	14.00 200.00/hr	2,800.00
JY	Attend trial; witness preparation.	10.00 200.00/hr	2,000.00
EAB	Review the trial testimony transcript for witness and prepare witness testimony summary; review Attorney General's amended exhibits and updated chart with a description of the exhibits.	13.25 200.00/hr	2,650.00
KN	Media reporting (Twitter); summary of witness testimony.	11.00 50.00/hr	NO CHARGE
9/8/2023 RH	Attend trial.	8.50 500.00/hr	4,250.00

			HRS/RATE	AMOUNT
9/8/2023	LH	Attend trial.	8.50 500.00/hr	4,250.00
	MCM	Draft employment law notes regarding witness testimony; attend trial day 4; attention to admitted exhibits and update team regarding same.	8.50 500.00/hr	4,250.00
	ES	Coordinate with Kylee Nichols, Jenny Brevorka, and Elvira Barajas regarding summaries of testimony.	0.50 500.00/hr	250.00
	DD	Attend trial.	8.50 500.00/hr	4,250.00
	LMG	Prepare for and attend trial.	9.75 500.00/hr	4,875.00
	JB	Prepare for and attend trial.	9.75 500.00/hr	4,875.00
	ACL	Attend trial; draft re-direct regarding witness testimony.	10.50 500.00/hr	5,250.00
	AD	Attend trial; prepare for trial the next day.	8.50 500.00/hr	4,250.00
	RG	Trial; attention to strategy.	3.50 500.00/hr	1,750.00
	LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict; begin preparing strategy for articles held in abeyance.	8.50 300.00/hr	2,550.00
	SJ	Participate in trial.	8.50 200.00/hr	1,700.00
	JY	Attend trial.	8.50 200.00/hr	1,700.00
	KN	Media reporting (Twitter) and testimony of Witness for the impeachment trial.	9.00 50.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
9/9/2023	RH	Review of materials in preparation for resumption of trial on Monday.	4.00 500.00/hr	2,000.00
	LH	Team meeting regarding witness order and closing argument; telephone conference with Ross Garber regarding Paxton experts; emails regarding potential motions for directed verdict; research regarding rules on closing argument; prepare motion to clarify rules regarding closing; telephone conference with witness counsel.	8.50 500.00/hr	4,250.00
	JB	Prepare for trial.	7.00 500.00/hr	3,500.00
	DD	Review and analyze notes regarding interviews with witness and documents regarding same; preparation of direct examination questions of multiple witnesses.	12.00 500.00/hr	6,000.00
	LMG	Prepare for trial; team meetings regarding trial strategy, witness order, and exhibits.	14.00 500.00/hr	7,000.00
	ACL	Meeting with trial team regarding witness order; phone call regarding privilege with Lara Hollingsworth, Board of Managers lawyer, and Rusty Hardin; draft outline for examination.	9.75 500.00/hr	4,875.00
	RG	Attention to legal issues; conference with co-counsel.	3.50 500.00/hr	1,750.00
	LBH	Research evidentiary issues for trial team.	2.50 300.00/hr	750.00
	SJ	Upload latest subpoenaed document productions; prepare and serve supplemental production on opposing counsel.	2.00 200.00/hr	400.00
	JY	Trial preparation.	8.00 200.00/hr	1,600.00

			HRS/RATE	AMOUNT
9/10/2023	RH	Attendance at interviews of multiple witnesses; review of material interviews and exhibits in preparation for Monday trial.	12.00 500.00/hr	6,000.00
	LH	Preparation for witness; telephone conferences with counsel for witness; review rules on closing argument; telephone conference with House Managers regarding closing argument; review motion to withdraw motion for ruling; draft closing argument; meeting with Rusty Hardin and Leah Graham regarding closing.	10.75 500.00/hr	5,375.00
	МСМ	Conference call with Lara Hollingsworth and Lisa Hobbs regarding responses to potential motions for directed verdicts; begin preparing same; revise and finalize HBOM's fifth amended exhibit list, including communications regarding branding exhibits and serving final list; confer with Leah Graham, Jenny Brevorka, and Stella Jares regarding exhibits; attention to service of text messages from witnesses.	10.50 500.00/hr	5,250.00
	JB	Prepare for trial.	10.00 500.00/hr	5,000.00
	DD	Attend interviews of multiple witnesses; review and analyze notes regarding interviews with another witness and documents regarding same; preparation of direct examination questions of witness.	9.00 500.00/hr	4,500.00
	LMG	Prepare for trial; multiple meetings regarding trial exhibits.	16.25 500.00/hr	8,125.00
	ACL	Telephone calls to witnesses regarding witness preparation; draft direct examination outline for a witness; review exhibits and prepare for meetings with multiple witnesses to prepare for trial.	15.75 500.00/hr	7,875.00

			HRS/RATE	AMOUNT
9/10/2023	RG	Trial preparation; attention to legal issues.	1.25 500.00/hr	625.00
	LBH	Confer with Ross Garber and Harriet O'Neill regarding possibility of motion for directed verdict; draft motion in opposition to allowing motions for directed verdicts; begin drafting response to anticipated motion for directed verdict.	4.25 300.00/hr	1,275.00
	SJ	Continue to work with team and witnesses in preparation for trial.	10.00 200.00/hr	2,000.00
	JY	Trial preparation.	10.50 200.00/hr	2,100.00
9/11/2023	RH	Attendance at trial; preparation of witness; review of materials in preparation for next day.	15.00 500.00/hr	7,500.00
	LH	Attend trial; draft closing argument; research regarding the rule and experts; prepare for trial; finalize motion to amend Rules 27 and 30a; draft motion to amend Rule 39b; emails regarding witness order.	13.00 500.00/hr	6,500.00
	МСМ	Attend trial day 5; prepare for trial day 6, including drafting, revising, and finalizing House Manager's Seventh Amended Exhibit List and preparing amended exhibits.	20.75 500.00/hr	10,375.00
	JB	Prepare for and attend trial; prepare for next day of trial.	16.00 500.00/hr	8,000.00
	DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	12.00 500.00/hr	6,000.00
	LMG	Prepare for and attend trial; prepare for next day of trial.	17.75 500.00/hr	8,875.00

			HRS/RATE	AMOUNT
9/11/2023	ES	Communicate with Kylee Nichols and Elvira Barajas regarding trial transcript summary project trial transcript summary project; review communication from Lisa Hobbs; communicate with Kylee Nichols regarding Lisa Hobbs' email.	0.50 500.00/hr	250.00
	ACL	Prepare for and attend trial; prepare for trial the next day.	16.50 500.00/hr	8,250.00
	AD	Attend trial; prepare for trial the next day.	12.00 500.00/hr	6,000.00
	RG	Trial; attention to legal issues.	3.50 500.00/hr	1,750.00
	LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict; edit and revise motion to amend Senate Rules 27 and 30(a); continue drafting response to anticipated motion for directed verdict.	11.00 300.00/hr	3,300.00
	JA	Assist trial team with exhibit redactions.	2.75 200.00/hr	550.00
	SJ	Participate in trial and assist trial attorneys to prepare for next day's witnesses; prepare 31st supplemental production of subpoenaed documents to opposing counsel.	22.00 200.00/hr	4,400.00
	JY	Attend trial; prepare for trial the next day.	10.00 200.00/hr	2,000.00
	KN	Media Reporting on Twitter from 9/9 to 9/11; testimony summary of trial witnesses.	10.00 50.00/hr	NO CHARGE
9/12/2023	RH	Attendance at trial; preparation of witness; meeting with Lara Hollingsworth regarding witnesses; review exhibits in preparation for next day.	16.00 500.00/hr	8,000.00

		HRS/RATE	AMOUNT
9/12/2023 LH	Attend trial; draft closing argument; meeting with Stacey Manela and Jenny Brevorka regarding closing argument; emails regarding witness order; meeting with Rusty Hardin regarding witnesses.	14.25 500.00/hr	7,125.00
MCM	Attend trial day 6; prepare for trial day 7, including compiling business record affidavits for key documents for summary witness, revising exhibit list to include same, and communications with opposing counsel regarding same.	15.50 500.00/hr	7,750.00
JB	Prepare for trial; attend trial; draft closing statement; prepare for next day's trial.	17.50 500.00/hr	8,750.00
DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	13.00 500.00/hr	6,500.00
LMG	Prepare for and attend trial; prepare for next day of trial.	16.00 500.00/hr	8,000.00
ES	Communicate with Kylee Nichols and Elvira Barajas regarding trial transcript summary project trial transcript summary project.	0.25 500.00/hr	NO CHARGE
ACL	Attend trial; prepare for next day's trial.	15.00 500.00/hr	7,500.00
AD	Cull quotes for closing; prepare for trial; summary witness notebooks; redact exhibits.	12.75 500.00/hr	6,375.00
RG	Trial; attention to legal issues.	6.50 500.00/hr	3,250.00
SMZ	Work on redaction of exhibits; emails with Aisha Dennis and staff regarding same.	0.75 200.00/hr	150.00
LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict; edit and revise motion in opposition to allowing motions for directed verdict; continue drafting	11.50 300.00/hr	3,450.00

			HRS/RATE	AMOUNT
		response to anticipated motion for directed verdict.		
9/12/2023	JA	Redact exhibit for trial team; communications with Aisha Dennis and Sylvia Martinez regarding same.	0.75 200.00/hr	150.00
	SJ	Participate in trial and assist trial attorneys to prepare for next day's witnesses; upload latest productions received via subpoena and produce same to opposing counsel.	15.00 200.00/hr	3,000.00
	JY	Attend trial.	10.00 200.00/hr	2,000.00
	EAB	Review the trial testimony transcript and prepare witness testimony summary; review and redact trial exhibits.	8.75 200.00/hr	NO CHARGE
	KN	Media reporting on Twitter from 9/12 as requested by Aisha Dennis; summarize trial testimony as requested by Jenny Brevorka.	8.50 50.00/hr	NO CHARGE
9/13/2023	RH	Attendance at trial; preparation for next day.	17.00 500.00/hr	8,500.00
	LH	Attend trial; draft closing argument; research regarding calling witness asserting the Fifth and invoking the rule; prepare for trial; review and edit motion to disallow motion for directed verdict; file motion to amend Rules 27 and 30a; team meeting regarding closing; meeting with Rusty Hardin, Jenny Brevorka, and Armie Lewis regarding closing.	12.75 500.00/hr	6,375.00
	MCM	Attend trial day 7; prepare for trial day 8, including compiling key testimony for closing arguments.	15.75 500.00/hr	7,875.00
	JB	Prepare for and attend trial; prepare for trial the next day.	17.00 500.00/hr	8,500.00

			HRS/RATE	AMOUNT
9/13/2023	DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	12.00 500.00/hr	6,000.00
	LMG	Prepare for and attend trial; prepare for next day of trial.	15.50 500.00/hr	7,750.00
	ES	Communicate with Kylee Nichols and Elvira Barajas regarding trial transcript summary project trial transcript summary project.	0.25 500.00/hr	NO CHARGE
	ACL	Attend trial; meeting regarding closing argument with Lara Hollingsworth, Jenny Brevorka, and Rusty Hardin.	16.75 500.00/hr	8,375.00
	AD	Attend trial; prepare for trial the next day.	11.00 500.00/hr	5,500.00
	RG	Trial; attention to legal issues.	11.75 500.00/hr	5,875.00
	SMZ	Work on redaction of exhibits.	0.75 200.00/hr	150.00
	LBH	Attend trial to outline evidence for closing argument and any motions for directed verdict; finalize motion in opposition to allowing motions for directed verdict; continue drafting response to anticipated motion for directed verdict.	7.25 300.00/hr	2,175.00
	SJ	Participate in trial and assist trial attorneys to prepare for next day's witnesses; upload latest productions received via subpoena and produce same to opposing counsel.	16.50 200.00/hr	3,300.00
	JY	Attend trial.	10.00 200.00/hr	2,000.00
	EAB	Review trial testimony transcript and prepare witness testimony summary.	8.75 200.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
9/13/2023	KN	Media reporting on Twitter from 9/13; prepare witness testimony summary.	8.00 50.00/hr	NO CHARGE
9/14/2023	RH	Attendance at trial; participate in preparation of final argument.	16.00 500.00/hr	8,000.00
	LH	Draft closing argument; review emails regarding same; review trial transcripts; meeting with team, regarding closing argument; meeting with Jenny Brevorka, Stacey Manela, Armie Lewis, and House Manager regarding closing argument.	15.00 500.00/hr	7,500.00
	МСМ	Attend trial day 8; prepare for trial day 9, including preparing for closing arguments.	16.25 500.00/hr	8,125.00
	JB	Prepare for and attend trial.	16.00 500.00/hr	8,000.00
	DD	Attend trial; prepare for next day of trial including preparation for direct examination of witnesses, preparing for legal issues, and preparing for cross-examinations.	13.00 500.00/hr	6,500.00
	LMG	Prepare for and attend trial; prepare for next day of trial.	19.75 500.00/hr	9,875.00
	ES	Communicate with Julie Ayers and Kendall Speer regarding potential research project; communicate with Kylee Nichols and Elvira Barajas regarding status of transcript review and summary.	0.25 500.00/hr	NO CHARGE
	ACL	Attend trial; draft portion of closing argument; edits to closing presentation with Lara Hollingsworth and Stacey Manela.	19.25 500.00/hr	9,625.00
	KVS	Research regarding rebuttal witnesses and attention to summarizing and sending same to Jennifer Brevorka.	2.00 500.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
9/14/2023 AD	Attend trial; trial tasks for Leah Graham regarding closing.	13.50 500.00/hr	6,750.00
RG	Trial; attention to legal issues; correspondence with co-counsel.	5.50 500.00/hr	2,750.00
LBH	Attend trial; begin drafting post-verdict motions.	10.50 300.00/hr	3,150.00
SJ	Participate in trial and assist trial attorneys in preparing for closing argument.	14.00 200.00/hr	2,800.00
JY	Attend trial and prepare witness.	10.00 200.00/hr	2,000.00
EAB	Continue to review the trial testimony transcript for multiple witnesses; prepare summaries of same.	9.50 200.00/hr	NO CHARGE
KN	Testimony summary of multiple witnesses; pin cites for closing statement outline.	6.75 50.00/hr	NO CHARGE
9/15/2023 RH	Attendance at trial; waiting for verdict.	10.50 500.00/hr	5,250.00
LH	Draft closing argument; meeting with Jenny Brevorka, Armie Lewis, Stacey Manela, and House Manager regarding same; attend trial.	10.50 500.00/hr	5,250.00
MCM	Continue preparing for closing arguments; attend trial day 9 (closing arguments).	7.00 500.00/hr	3,500.00
JB	Prepare for and attend trial.	8.00 500.00/hr	4,000.00
DD	Attend trial; attend meetings regarding closing arguments.	5.00 500.00/hr	2,500.00
LMG	Prepare for and attend trial.	7.00 500.00/hr	3,500.00

			HRS/RATE	AMOUNT
9/15/2023	ES	Communicate with Elvira Barajas, Jenny Brevorka, and Kylee Nichols regarding trial transcripts.	0.25 500.00/hr	NO CHARGE
	ACL	Attend trial.	11.00 500.00/hr	5,500.00
	AD	Attend closing; trial debrief with team.	3.00 500.00/hr	NO CHARGE
	RG	Trial; correspondence with co-counsel.	3.00 500.00/hr	1,500.00
	LBH	Attend trial; edit and revise post-verdict motions and outline strategy for motions for trial team.	4.75 300.00/hr	1,425.00
	SJ	Participate in trial.	6.00 200.00/hr	1,200.00
	JY	Attend trial and meetings afterwards; closing arguments.	3.00 200.00/hr	NO CHARGE
	EAB	Review the trial testimony transcript for multiple witnesses and prepare witness testimony summaries of same.	4.00 200.00/hr	NO CHARGE
	KN	Media reporting (Twitter) as requested by Aisha Dennis.	4.50 50.00/hr	NO CHARGE
9/16/2023	RH	Attendance at verdict and tongue lashing by Lieutenant Governor.	2.50 500.00/hr	1,250.00
	RH	Post-trial meeting with client and legal team.	1.00 500.00/hr	NO CHARGE
	MCM	Attend trial day 10 (verdict); travel from Austin to Houston.	5.50 500.00/hr	2,750.00
	JB	Attend trial; participate in post-trial meeting with client and team; return travel to Houston.	5.50 500.00/hr	2,750.00

		HRS/RATE	AMOUNT
9/16/2023 DD	Attend trial; return travel from impeachment trial from Austin back to Houston.	5.50 500.00/hr	2,750.00
DD	Post-verdict meetings	1.00 500.00/hr	NO CHARGE
LMG	Attend final vote; travel back from Austin.	5.50 500.00/hr	2,750.00
LH	Telephone conference with House Manager regarding potential motions; draft motion to extend judgment to disqualification; draft motion to amend Rule 30b; attend trial; travel to Houston.	5.50 500.00/hr	2,750.00
JB	Post-verdict meetings.	1.00 500.00/hr	NO CHARGE
LMG	Post-verdict meetings.	1.00 500.00/hr	NO CHARGE
LH	Post trial meeting with legal team.	1.00 500.00/hr	NO CHARGE
MCN	Post-verdict meetings.	1.00 500.00/hr	NO CHARGE
ACL	Attend trial; return to Houston from Austin.	5.50 500.00/hr	2,750.00
AD	Attend jury verdict.	2.50 500.00/hr	1,250.00
ACL	Post-verdict meetings.	1.00 500.00/hr	NO CHARGE
AD	Trial debrief with team.	1.00 500.00/hr	NO CHARGE
RG	Attention to trial and verdict; correspondence with co-counsel.	1.50 500.00/hr	750.00

		HRS/RATE	AMOUNT
9/16/2023 LBH	Finalize post-verdict motions; confer with Lara Hollingsworth and Harriet O'Neill regarding strategy of same; attend trial.	3.50 300.00/hr	1,050.00
SJ	Attend and assist attorneys during impeachment votes.	2.50 200.00/hr	500.00
SJ	Post-trial meeting with legal team.	1.00 200.00/hr	NO CHARGE
JY	Attend trial; verdict; return to Houston.	5.50 200.00/hr	1,100.00
JY	Post-trial meetings.	1.00 200.00/hr	NO CHARGE
9/17/2023 AD	Travel to Houston.	3.00 500.00/hr	1,500.00
SJ	Organize trial materials in preparation for return to Houston; return to Houston.	6.00 200.00/hr	1,200.00
9/21/2023 RH	Review draft invoice; meeting with Joe Roden, Lara Hollingsworth, Megan Moore, Armie Lewis, Leah Graham, Daniel Dutko, and Jim Yarbrough to discuss invoice, eliminating certain charges and issue of document release.	2.00 500.00/hr	NO CHARGE
Total	Legal Fees This Invoice	2196.75	\$902,925.00

EXPENSES

		AMOUNT
9/1/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hosting storage, user licensing, and other eDiscovery services for August and September 2023 CS Disco, Inc. #331236	10,774.48
RH	Rental of Toshiba copier for September 2023 Mannings Office Solutions #INV46957 Amex 09/2023	541.25
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/1/2023 MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Transportation from van rental location to office to return rental van Uber Amex 09/2023	28.71
9/2/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/2/2023 RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
JB	Valet parking at Doubletree Hotel for Witness Doubletree Hotel Amex 10/2023	23.82
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/2/2023 RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
9/3/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Transportation from Capitol to Austin Airport after meeting with Rusty Hardin and team Witness Expense Report (Lyft)	25.84
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
RH	Transportation from Austin Airport to Capitol for meeting with Rusty Hardin and team Witness Expense Report (Lyft)	22.71
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/3/2023 LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/4/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/4/2023 AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
SJ	Exhibits for use in direct examination of Witness Blowback printing with assembly and redwells Array #X78914	159.67
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Transportation from airport to Doubletree Hotel Uber Amex 09/2023	33.54
ELG	One way trip from Houston (Hobby) Airport to Austin Southwest Airlines #5262498013988 Amex 09/2023	246.98
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/5/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/5/2023 RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/5/2023 SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Delivery to Jim Yarbrough at DoubleTree Hotel in Austin FedEx Tracking ID #773312608287 Amex 10/2023	49.48
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/6/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
RH	Transportation from Austin Airport to DoubleTree Hotel Lyft Witness Expense Report	28.85
RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Round trip airfare to Austin for Witness Southwest Airlines 3P6DX3 American Express 10/2023	547.96

		AMOUNT
9/6/2023 JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/6/2023 JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/7/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Technology support to set up for trial in Austin IAG Business Technology #38100	1,040.13
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Valet Parking for Witness Doubletree Hotel Amex 10/2023	43.30
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/7/2023 LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/7/2023 ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/8/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Reporter's Record - Daily Copy Transcript Volumes #2-AM and #4-AM Cherry Stenographers. LLC	3,315.50
RH	Reporter's Record - Daily Copy Transcript Volumes #1-AM, #3-PM, and #4-PM Lorrie A. Schnoor & Company, LLC	7,767.00
RH	Transportation from DoubleTree Hotel to Austin Airport Lyft Witness Expense Report	23.82
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Expenses for work rooms Doubletree Hotel Amex 10/2023	7,352.20
RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
JB	3 Sets of Binders with Documents for trial Blowback printing, tabs, and binders Array #X78927	1,088.07

		AMOUNT
9/8/2023 JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Transportation to hotel Uber Amex 10/2023	26.19

		AMOUNT
9/8/2023 JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/9/2023 RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Reporter's Record - Daily Copy Transcript Volumes #1-PM, #2-PM, and #3-AM Mary Oralia Berry, CSR, RDR, CRC, CBC	7,882.00
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
LH	Transportation to hotel Uber Lara Hollingsworth Expense Report	17.64
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/9/2023 LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/10/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Valet Parking for Witness Doubletree Hotel Amex 10/2023	43.30
RH	One way airfare to Austin (returned home with family) for Witness Southwest Airlines 44E5G5 American Express 10/2023	371.98
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/10/2023 MCN	M Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/11/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/11/2023 RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
RH	Valet Parking for Witness Doubletree Hotel Amex 10/2023	43.30
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	6 Binders/3 Sets of AG Exhibits 297-433 Blowback printing with assembly, tabs, and binders Array #X78925	1,415.42
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
МСМ	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/11/2023 ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
SJ	3 Sets of Revised Exhibits (25, 98, 129, and 151) Blowback printing with assembly and redweld Array #X78919	185.87
SJ	Witness Exhibits Blowback printing and file folders Array #X78924	240.10
SJ	3 Sets of Exhibits 553-627 Blowback printing with assembly, tabs, and binders Array #X78912	601.60
SJ	5 Sets Foldered Exhibits/Hot Docs Blowback printing, folders, and redwelds Array #X78922	868.71
SJ	8 Sets of Documents for Attorney Use at Trial Blowback printing with assembly, tabs, and binders Array #X78909	1,059.55
SJ	8 Sets of Documents for Attorney Use at Trial Blowback printing with assembly, tabs, and binders Array #X78920	1,082.50
SJ	10 Trial Notebooks Blowback printing with assembly, tabs, and binders Array #X78913	1,406.71

			AMOUNT
9/11/2023	S SJ	9 Binders/3 Sets of Exhibit 257 Blowback printing with assembly Array #X78926	1,712.73
	SJ	8 Sets of Documents for Attorney Use at Trial Blowback printing with assembly, tabs, and binders Array #X78921	1,876.62
	SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
	JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
	ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/12/2023	RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
	RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
	RH	Hotel Room plus taxes in Austin for trial Witness Doubletree Hotel Amex 10/2023	184.86
	JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/12/2023 LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/12/2023 JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/13/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/13/2023 DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
RG	Airfare - One way Austin to New Orleans Ross Garber Southwest Airlines The Garber Group LLC #1171	367.98
RG	Transportation from hotel to airport Ross Garber Uber The Garber Group LLC #1171	35.93
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	184.86
RG	Per diem allowance for Ross Garber 8 days at \$64 per day less meals provided for trial September 11 - September 13, 2023	377.00
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Professional services - September 13 and 14, 2023 Verification of addresses by Investigator Paul Brick Superior Investigating and Consulting, LLC #23-SUB-0002	1,164.25

Texas House of R	epresentatives Board of Managers	Page	48
		_	AMOUNT
9/13/2023 JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023		184.86
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023		184.86
9/14/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023		184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023		184.86
RH	Reporter's Record - Daily Copy Transcript Volumes #5-AM, #6-AM, and #7 and 7-1 AM) Cherry Stenographers, LLC		5,661.50
RH	Consulting Services - Scott Bayley Accumyn Consulting LLC #Paxton062-1		15,207.00
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka		184.86

184.86

184.86

Doubletree Hotel Amex 10/2023

Doubletree Hotel Amex 10/2023

Leah Graham Doubletree Hotel Amex 10/2023

Hotel Room plus taxes in Austin for trial Lara Hollingsworth

LMG Hotel Room plus taxes in Austin for trial

LH

		AMOUNT
9/14/2023 MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY	Batch review session 091423KO1758 Find nowspace Ilc Texas Secretary of State Jane Nelson Amex 10/2023	22.00
JY	Online Research - Find/Find by Global People Name Nowspace LLC/Natin Paul, certified copies - 8 pages Office of the Secretary of State #128489870 Amex 10/2023	23.00
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/14/2023 ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
ELG	Parking in Austin Amex 10/2023	2.25
9/15/2023 RH	Meals for 9 trial days September 5, 6, 7, 8, 11,12,13,14,15, 2023	4,290.00
RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86
MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86

			AMOUNT
9/15/2023 LI	.H	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
A	ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86
Al	ΛD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
S	3J	Daily Copy Transcript Volume #5-PM Daily Copy Transcript Volume #9-AM Lorrie A. Schnoor & Company, LLC	5,900.50
S		Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
JY		Transportation from Capitol to hotel Jim Yarbrough and Armie Lewis Uber Amex 10/2023	19.28
JY		Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
EL		Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/16/2023 RH		Reporter's Record - Daily Copy Transcript Volumes #6-PM, #7-PM, and #8-AM Mary Oralia Berry, CSR, RDR, CRC, CBC	8,300.50

		AMOUNT
9/16/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	184.86
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	184.86
RH	Per diem allowance for Rusty Hardin 19 days at \$64 per day less meals provided for trial August 29, 2023 - September 16, 2023	956.00
RH	Per diem allowance for Stacey Manela 19 days at \$64 per day less meals provided for trial August 29, 2023 - September 16, 2023	956.00
LH	One way mileage from Austin to residence 154 miles @ \$0.655 per mile Lara Hollingsworth Expense Report	100.87
МСМ	Round-trip mileage to Austin for trial 318 miles @ \$0.655 per mile Megan Moore Expense Report	208.29
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	184.86
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	184.86
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/16/2023 LH	Per diem allowance for Lara Hollingsworth 18 days at \$64 per day less meals provided for trial August 30, 2023 - September 16, 2023	892.00
MCM	Hotel Room plus taxes in Austin for trial Megan Moore Doubletree Hotel Amex 10/2023	184.86
JB	Per diem allowance for Jenny Brevorka 19 days at \$64 per day less meals provided for trial August 29, 2023 - September 16, 2023	956.00
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	184.86
LMG	Per diem allowance for Leah Graham 18 days at \$64 per day less meals provided for trial August 30, 2023 - September 16, 2023	892.00
МСМ	Per diem allowance for Megan Moore 15 days at \$64 per day less meals provided for trial September 2 - September 16, 2023	700.00
DD	Per diem allowance for Daniel Dutko 17 days at \$64 per day less less meals provided for trial August 31, 2023 - September 16, 2023	828.00
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	184.86

		AMOUNT
9/16/2023 ACL	Per diem allowance for Armie Lewis 19 days at \$64 per day less meals provided for trial August 29, 2023 - September 16, 2023	956.00
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	184.86
AD	Per diem allowance for Aisha Dennis 17 days at \$64 per day less meals provided for trial August 31, 2023 - September 16, 2023	828.00
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	184.86
SJ	Per diem allowance for Stella Jares 18 days at \$64 per day less meals provided for trial August 30, 2023 - September 16, 2023	892.00
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	184.86
JY	Per diem allowance for Jim Yarbrough 18 days at \$64 per day less meals provided for trial August 30, 2023 - September 16, 2023	892.00
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
9/17/2023 AD	Transportation from hotel to Barton Springs bus terminal Uber Aisha Dennis Expense Report	17.91

			AMOUNT
9/17/2023	AD	Bus fare from Barton Springs to Houston Vonlane Aisha Dennis Expense Report	129.00
	AD	Transportation from bus terminal to residence Uber Aisha Dennis Expense Report	9.90
	SJ	One way mileage to Houston 164 miles @ \$0.655 per mile Stella Jares Expense Report	107.42
j	ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	184.86
	ELG	Fuel for U-Haul truck to transport documents and equipment from Austin to RH&A in Houston Exxon Mobil Amex 10/2023	85.44
I	ELG	U-Haul truck rental in Austin to transport documents and equipment to Houston U-Haul at University of Texas Amex 10/2023	160.60
I	ELG	Per diem allowance for meals for Eddie Gaines 15 days at \$64 per day August 30, 2023, September 4 - September 17, 2023	960.00
9/18/2023 F	RH	Rental copier - contract overage September 1 - 17, 2023 Manning Office Solutions #INV47045 Amex 10/2023	808.03
J	JB	Blowback printing with assembly, tabs, file folders, and redwelds - Exhibits Array #X79258	387.32
J	JB	Blowback printing and file folders Array #X79259	306.89

		AMOUNT
9/18/2023 SJ	Blowback printing with assembly Exhibits 706 and 707 and 7th Amended Exhibit List Array #X79255	92.55
SJ	Blowback printing color - Closing PowerPoint Array #X79257	185.65
SJ	Reporter's Record - Daily Copy Transcript Volumes #8-PM and 10 Realtime Deposition Services #10059	3,637.50
SJ	Admitted Exhibits - HBOM and AG Blowback printing with assembly, tabs, binders, and thumb drives Array #X79256	10,923.24
SJ	Blowback printing with assembly Array #X79252	49.04
ELG	Additional mileage charge on rental of U-Haul truck 8 miles @ \$1.00 per mile plus rental tax U-Haul #14710305 Amex 10/2023	8.80
9/19/2023 RH	Professional services during trial preparation and attendance Technical and audio/visual litigation support Art of Facts #1106	46,884.69
Total	Expenses	\$206,211.02
Total	Fees and Expenses this Invoice	\$1,109,136.02

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Time	keeper	Summar	J

Name	HOU	RS F	RATE	AMOUNT
Rusty Hardin	191.			\$95,500.00

Name HOURS RATE AMOU Rusty Hardin 3.00 0.00 \$0. Daniel Dutko 154.50 500.00 \$77,250. Emily Smith 1.00 0.00 \$0. Emily Smith 2.75 500.00 \$1,375. Jennifer Brevorka 205.00 500.00 \$0. Jennifer Brevorka 1.00 0.00 \$0. Lara Hollingsworth 173.50 500.00 \$86,750. Leah Graham 230.25 500.00 \$115,125.	
Daniel Dutko 154.50 500.00 \$77,250. Daniel Dutko 1.00 0.00 \$77,250. Emily Smith 2.75 500.00 \$1,375. Emily Smith 1.50 0.00 \$0. Jennifer Brevorka 205.00 500.00 \$102,500. Jennifer Brevorka 1.00 0.00 \$0. Lara Hollingsworth 173.50 500.00 \$86,750. Leah Graham 1.00 0.00 \$0.	
Daniel Dutko 154.50 500.00 \$77,250. Emily Smith 2.75 500.00 \$1,375. Emily Smith 1.50 0.00 \$0. Jennifer Brevorka 205.00 500.00 \$102,500. Jennifer Brevorka 1.00 0.00 \$0. Lara Hollingsworth 173.50 500.00 \$86,750. Leah Graham 1.00 0.00 \$0.	
Emily Smith 2.75 500.00 \$1,375. Emily Smith 1.50 0.00 \$0. Jennifer Brevorka 205.00 500.00 \$102,500. Jennifer Brevorka 1.00 0.00 \$0. Lara Hollingsworth 173.50 500.00 \$86,750. Leah Graham 1.00 0.00 \$0.	
Emily Smith 1.50 0.00 \$1,375. Jennifer Brevorka 205.00 500.00 \$102,500. Jennifer Brevorka 1.00 0.00 \$0. Lara Hollingsworth 173.50 500.00 \$86,750. Leah Graham 1.00 0.00 \$0.	
Jennifer Brevorka 205.00 500.00 \$0. Jennifer Brevorka 1.00 500.00 \$102,500. Lara Hollingsworth 173.50 500.00 \$86,750. Leah Graham 1.00 0.00 \$0.	00
Jennifer Brevorka Lara Hollingsworth Lara Hollingsworth Leah Graham 203.00 \$0.00 \$102,500. 1.00 0.00 \$0. \$102,500. \$1	00
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Megan Moore 100.73 500.00 \$90,375.	00
Aisha Donnis 1.00 0.00 \$0.0	
Aisha Donnia 130.00 500.00 \$68,000.0)0
Armstead Lewis 6.75 0.00 \$0.0	
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Armstead Lewis 1.00 0.00 \$0.0	00
Kendall Speer 2.00 0.00 \$0.0	00
Lisa Hobbs 116.50 300.00 \$34,950.0	00
1005 Galber 89 25 500 00 \$44 625 0	
Sylvia Martinez 1.50 200.00 \$300.0	0
3.50 200.00 \$700.0	
192.25 200.00 \$38.450.0	
Stella Jares 1.00 0.00 so c	
3iii Farbrough 150 00 200 00 \$30 000 0	
Jill Yarbrough 4 00 0 00 \$0.0	
Elvira Barajas 13 25 200 00 \$2 650 0	
Elvira Barajas 31.00 0.00 \$0.0	
Kylee Nichols 72.75 0.00 \$0.0	

RUSTY HARDIN & ASSOCIATES, LLP

Texas House of Representatives Board of Managers Chairman Andrew Murr, House Board of Managers ATTN: Logan Harrison P. O. Box 2910, Room E1.308

Austin, TX 78768

Fed Tax ID#76-0518681 Invoice # 23387 Client/Matter No. 3655.01 -Impeachment November 20, 2023

HOUSE OF REPRESENTATIVES

In Reference To: Impeachment Proceedings of

Texas Attorney General Warren Kenneth Paxton, Jr.

STATEMENT

	100		
LEG	AL FEES		
		HRS/RATE	AMOUNT
7/1/2023 RH	Review documents, including past interviews, in preparation for trial.	3.50 500.00/hr	1,750.00
7/2/2023 RH	Review past interviews in preparation for trial.	4.00 500.00/hr	2,000.00
ACL	Review transcripts and draft notes regarding interview of Witness 1, Witness 2, Witness 3, Witness 4, Witness 5, and Witness 6.	4.00 500.00/hr	2,000.00
7/3/2023 RH	Review past interviews in preparation for trial.	5.00 500.00/hr	2,500.00
JB	Confer numerous times with Board of Managers lawyer and Armie Lewis regarding witness interviews; review and respond to e- mail correspondence about TEC filings,	5.00 500.00/hr	2,500.00
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			HRS/RATE	AMOUNT
		impeachment documents for chronology, documents for lawyer preparation, Esther Blind Trust; attention to investigative leads; research about impeachment proceedings in other cases.		
7/3/2023	ACL	Review interviews and make notes regarding interviews of Witness 1; draft email regarding documents for upcoming witness interviews of Witness 1, Witness 2, Witness 3, Witness 4, and Witness 5; telephone call with Jenny Brevorka regarding interview scheduling; telephone calls to schedule witness interviews; draft chart of interview schedule.	6.75 500.00/hr	3,375.00
	SJ	Begin identifying documents for attorney use in interviews; organize files and consolidate same.	4.75 200.00/hr	950.00
	JY	Continue work on Esther Blind Trust, Sundance Memory Care, Sundance At Brushy Creek, WCP Fund GP LLC, and 281 WB GP LLC; prepare memo related to same.	9.00 200.00/hr	1,800.00
	MMC	Research regarding impeachment of prior officials (state and federal).	5.00 100.00/hr	NO CHARGE
	JAG	Summarize discovery in chart.	7.00 50.00/hr	NO CHARGE
7/4/2023	RH	Telephone conference with Jim Yarbrough regarding potential witnesses.	0.50 500.00/hr	250.00
	RH	Review materials, particularly previous interviews, in preparation for trial.	5.00 500.00/hr	2,500.00
	JB	Telephone call with Armie Lewis regarding interview scheduling.	0.50 500.00/hr	250.00
	ACL	Review interviews and take notes regarding interview of witness; review Office of the Attorney General report regarding witness interview and second witness interview; telephone	8.25 500.00/hr	4,125.00

		HRS/RATE	AMOUNT
	call with Chip Lewis to schedule witness interview.		
7/4/2023 JY	Telephone conference with Rusty Hardin regarding potential witnesses; attention to emails and messages; research on witness; communications with Board of Managers staff.	4.50 200.00/hr	900.00
7/5/2023 RH	Review previous interviews and documents in preparation for trial; conference with Jim Yarbrough regarding interviews; conference with Jim Yarbrough and Board of Managers staff regarding interviews.	6.00 500.00/hr	3,000.00
LH	Team meeting regarding trial issues, including legal issues and potential motions; update running list of legal issues per Paxton's counsel's statements; attempt call with opposing counsel regarding motions; correspondence with Jenny Brevorka regarding subject matters for motions.	2.25 500.00/hr	NO CHARGE
JB	Participate in weekly group meeting; confer with Armie Lewis multiple times regarding witness interviews and preparations for interviews; confer with Stella Jares regarding witness interviews; review motion materials and e-mail correspondence with Lara Hollingsworth regarding motions and additional topics for motions.	4.00 500.00/hr	2,000.00
LMG	Prepare for and attend meeting regarding status of document collection, and review and logistics relating to same; prepare for and attend meeting regarding overall strategy and logistics; continue to review and analyze client documents and prepare attorney work product in connection with same.	8.50 500.00/hr	4,250.00
AD	OAG document review; attend team meeting.	3.25 500.00/hr	1,625.00

		HRS/RATE	AMOUNT
7/5/2023 ACL	Review interviews and take notes regarding interviews of Witness 1 and Witness 2; conferences with Jenny Brevorka regarding witness interview preparations.	3.00 500.00/hr	1,500.00
SJ	Preparation of documents for attorneys' use in interviews of Witness 1 and Witness 2; full team meeting via Zoom; circulate minutes of team meeting; confer with Leah Graham regarding documents for attorney use at interviews; research key documents; conference with Jenny Brevorka regarding witness interviews.	7.50 200.00/hr	1,500.00
JY	Conference with Rusty Hardin regarding interviews; conference with Armie Lewis regarding documents for attorney use at interviews; participate in RHA Team and Investigative Team weekly meeting including with House Manager; review interview of Witness 1; telephone conference with Rusty Hardin and Board of Managers staff regarding interviews.	9.00 200.00/hr	1,800.00
MMC	Create chart with state elected officials who have previously been impeached regarding impeached elected officials (state or federal)).	5.00 100.00/hr	NO CHARGE
MV	Discuss new project with Leah Graham regarding Kenneth Paxton's impeachment; prepare proof charts per article of impeachment.	1.75 100.00/hr	NO CHARGE
JAG	Summarize discovery into chart and participate in Zoom meeting; discuss discovery with Aisha Dennis.	7.00 50.00/hr	NO CHARGE
ZT	Talked with Aisha Dennis and Jodie Aguirre about document summary; read through Jodie Aguirre hearing summary to get background information on the case; went through Office of Attorney General's documents and summarized them.	2.00 50.00/hr	NO CHARGE
TW	Research past Kenneth Paxton's lawsuits.	1.50 50.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
7/6/2023 RH	Travel to and from Austin; review of materials in preparation for interview of two witnesses; attendance at interviews of Witness 1 and Witness 2 with Leah Graham, Armie Lewis, Jim Yarbrough, Dick DeGuerin, and others who participated remotely; continued review of materials; confer with Jenny Brevorka regarding subpoenas.	12.00 500.00/hr	6,000.00
JB	Telephone conference with investigative team and trial team; review and revise subpoenas and attachments; confer with Rusty Hardin regarding subpoenas; correspondence with investigators regarding subpoenas and contents.	1.50 500.00/hr	750.00
LMG	Travel to and from Austin for interview of Witness 1 and Witness 2; continue to review and analyze client documents and prepare attorney work product relating to same; prepare for and participate in team meeting regarding document review, collection, and logistics relating to same; continue to monitor media coverage and coordinate with Aisha Dennis to circulate report regarding same to the team.	12.25 500.00/hr	6,125.00
JB	Participate in witness interview.	3.00 500.00/hr	NO CHARGE
AD	Media monitoring; email media report to team.	0.75 500.00/hr	NO CHARGE
ACL	Travel to Austin regarding Witness 1 and Witness 2 interview; participate in telephone interviews of Witness 1 and Witness 2; draft notes and memo regarding witness interviews.	12.00 500.00/hr	6,000.00
SJ	Continue to upload latest received document productions; revise database coding panel; attention to logistics for upcoming meeting with impeachment expert, Ross Garber.	5.00 200.00/hr	1,000.00

			HRS/RATE	AMOUNT
7/6/2023	JY	Travel to Austin for interviews of Witness 1 and Witness 2 with Leah Graham and Armie Lewis.	12.00 200.00/hr	2,400.00
	KN	Compile research for trial.	1.00 100.00/hr	NO CHARGE
	MV	Pull cases for Jennifer Brevorka and conduct research regarding sovereign immunity waivers and compelled testimony for discussion with Jennifer Brevorka; background research to complete a "players" list in Kenneth Paxton's impeachment; continue research for Jennifer Brevorka and discuss findings regarding sovereign immunity waivers and compelled testimony.	8.25 100.00/hr	NO CHARGE
	MMC	Continue preparing chart regarding impeached elected officials (state and federal).	5.00 100.00/hr	NO CHARGE
	ZT	Continue reviewing and summarizing OAG documents; assist Leah Graham with research regarding witness.	4.50 50.00/hr	NO CHARGE
	TW	Continue research for trial.	1.75 50.00/hr	NO CHARGE
	JAG	Continue summarizing discovery.	7.00 50.00/hr	NO CHARGE
7/7/2023	RH	Meeting with Ross Garber and team to discuss his role; conference with Lara Hollingsworth and Jenny Brevorka regarding request for disclosures and response.	5.00 500.00/hr	2,500.00
	JB	Attend meeting with Impeachment Team and Ross Garber; review demand for disclosure; confer with Lara Hollingsworth and Rusty Hardin regarding request for disclosure and response; review case law cited in correspondence; multiple conferences with Aisha Dennis, Leah Graham, and Stella Jares regarding database.	4.00 500.00/hr	2,000.00

		HRS/RATE	AMOUNT
7/7/2023 LMG	Continue to monitor media coverage; continue to review and analyze client documents; prepare attorney work product in connection with same; meeting with potential expert and team; attention to Ken Paxton's team's demand for discovery and motion to preclude compelling Paxton to testify; multiple conferences with Jenny Brevorka, Aisha Dennis, and Stella Jares regarding database.	6.00 500.00/hr	3,000.00
LH	Confer with Rusty Hardin and Jenny Brevorka regarding request for disclosures and response.	0.25 500.00/hr	125.00
AD	Multiple conferences with Jenny Brevorka, Leah Graham, and Stella Jares regarding database.	1.25 500.00/hr	625.00
ACL	Prepare memo regarding interview schedule.	0.50 500.00/hr	250.00
AD	Meeting with expert, Ross Garber.	2.00 500.00/hr	NO CHARGE
SJ	Participate in team meeting with potential expert; multiple conferences with Jenny Brevorka, Aisha Dennis, and Leah Graham regarding database; prepare witness materials for Rusty Hardin's review; continue to upload and organize document productions.	10.50 200.00/hr	2,100.00
KN	Continue research for trial.	3.25 100.00/hr	NO CHARGE
MV	Pull cases, highlighting each pincite; pull congressional records, highlighting pincites; prepare notes for review by Leah Graham and Jennifer Brevorka.	4.00 100.00/hr	NO CHARGE
ММС	Continue preparing chart regarding all elected and appointed officials who have been impeached in all other states; continue gathering and highlighting cases.	7.75 100.00/hr	NO CHARGE
	Conference call with House Manager and counsel; continued research; drafting of potential format for OAG waiver on contracts and conversations; analysis of OCC contracts.	2.25 500.00/hr	1,125.00

		HRS/RATE	AMOUNT
7/7/2023 ZT	Review OAG documents for Leah Graham; summarize OAG documents and participate in an expert meeting.	5.50 50.00/hr	NO CHARGE
TW	Attend impeachment expert meeting.	2.75 50.00/hr	NO CHARGE
JAG	Summarize discovery and discuss with Leah Graham; participate in Zoom meeting.	7.00 50.00/hr	NO CHARGE
7/8/2023 RH	Review interviews and multiple documents in preparation for trial.	4.00 500.00/hr	2,000.00
JB	Draft and revise letter to opposing counsel regarding discovery demands and motions.	2.00 500.00/hr	1,000.00
LMG	Continue to monitor media coverage; continue to review and analyze client documents and prepare attorney work product in connection with same.	6.00 500.00/hr	3,000.00
7/9/2023 RH	Telephone conference and correspondence with team to discuss discovery letter received from Ken Paxton's lawyer.	1.00 500.00/hr	500.00
LH	Edit letter response to Paxton discovery demand; calls and emails with team regarding privilege issues.	3.50 500.00/hr	1,750.00
JB	Telephone conference with Lara Hollingsworth, Harriet O'Neill, and Lisa Hobbs regarding potential litigation; telephone conference with Rusty Hardin, Dick DeGuerin, Lara Hollingsworth, and client regarding waiver of privilege; review edits to letter regarding discovery; telephone discussion with Lara Hollingsworth regarding revisions; e-mail correspondence with Rusty Hardin regarding revisions to letter to opposing counsel.	2.50 500.00/hr	1,250.00
LMG	Continue to monitor media coverage; continue to review and analyze client documents and prepare attorney work product in connection with same.	11.25 500.00/hr	5,625.00

			HRS/RATE	AMOUNT
7/9/2023	LBH	Phone conference with legal team regarding legal issues; research possibility of judicial review.	2.75 300.00/hr	825.00
	SJ	Continue to work on database document review.	3.50 200.00/hr	700.00
7/10/2023	RH	Review documents in preparation for interviews and trial; review of emails and drafts regarding discovery issues.	3.00 500.00/hr	1,500.00
	LH	Edit notice regarding responses to Paxton filings.	0.75 500.00/hr	375.00
	LMG	Continue to monitor media coverage and reporting of new facts; circulate report to team for review; continue to review and analyze client documents; prepare attorney work product relating to same; multiple telephone calls with Jim Yarbrough and Board of Managers lawyer regarding investigative threads, responses to subpoenas, and issues relating to same.	9.75 500.00/hr	4,875.00
	JB	Revise and edit responsive correspondence to opposing counsel about pre-trial matters; correspondence with client and team about responsive materials; phone call with client and team members about revisions to responsive correspondence; conference with Stella Jares and Aisha Dennis regarding database.	3.75 500.00/hr	1,875.00
	AD	Discussion with Stella Jares regarding document production; meeting with Jenny Brevorka and Stella Jares regarding database.	0.75 500.00/hr	375.00
	LBH	Edit and revise letter to Paxton team regarding pre-trial issues.	0.25 300.00/hr	75.00
	SJ	Extended conference with Jenny Brevorka and meeting with Aisha Dennis regarding database; prepare additional coding panel; research Mitte Foundation civil docket; begin document review for purposes of production to opposing counsel; research recorded interviews.	4.75 200.00/hr	950.00
	CD	Deliver redraft of proposed letter of waiver and analysis of comments.	1.25 500.00/hr	625.00

			HRS/RATE	AMOUNT
7/10/2023	JY	Telephone conferences separately with Board of Managers lawyers, Mark White, and Leah Graham; telephone conference(s) with witness, research documents, and attend to emails.	8.50 200.00/hr	1,700.00
	KN	Continue research for trial.	3.00 100.00/hr	NO CHARGE
	MMC	Amend work product chart.	0.50 100.00/hr	NO CHARGE
	TS	Review discovery.	0.50 50.00/hr	NO CHARGE
	JAG	Continue to summarize discovery.	7.00 50.00/hr	NO CHARGE
	TW	Summarize witness documents.	0.75 50.00/hr	NO CHARGE
7/11/2023	RH	Telephone conference seeking evidence with person with past information.	0.50 500.00/hr	250.00
	RH	Conference with Jenny Brevorka regarding letter response to opposing sides demand for discovery; edit letter response draft; repeated exchange of emails regarding motions to be filed and responses to Paxton team documents; telephone conference with Board of Managers lawyer regarding other lead for other matters; multiple calls with Jenny Brevorka regarding documents to be filed and meetings to be held; conference call with Lara Hollingsworth regarding draft notice.	2.00 500.00/hr	1,000.00
	RH	Review documents; read and respond to numerous emails regarding issues to be considered, including response to July letter of Ken Paxton's lawyer.	4.00 500.00/hr	2,000.00
	RH	Telephone conference with Lara Hollingsworth regarding response to Paxton recent filings.	0.25 500.00/hr	125.00

		HRS/RATE	AMOUNT
7/11/2023 LH	Edit list of potential legal issues; draft notice regarding response to Paxton recent filings; telephone conference with Rusty Hardin regarding same.	4.25 500.00/hr	2,125.00
LMG	Continue to review and analyze client documents; continue to prepare attorney work product in connection with same; continue to monitor news coverage and reporting of additional facts; circulate report to the team; strategy call with Jenny Brevorka and Stella Jares regarding various pretrial issues and logistics; strategy conference with Jim Yarbrough regarding additional investigative threads, potential subpoena requests, and issues relating to same.	10.25 500.00/hr	5,125.00
JB	Multiple phone calls with Rusty Hardin regarding letter response to opposing sides demand for discovery and upcoming meetings; strategy call with Leah Graham and Stella Jares regarding pretrial issues and logistics.	1.00 500.00/hr	500.00
AD	Conference with Stella Jares regarding document review.	0.25 500.00/hr	125.00
SJ	Continue document review for potential production to Paxton; telephone conference with Jenny Brevorka and Leah Graham and later conference with Leah Graham regarding database review; forward key documents to team per their requests; conference with Aisha Dennis regarding document review.	6.00 200.00/hr	1,200.00
JY	Research regarding property ownership; several telephone conferences with witness; work on memo for team; conferences with Leah Graham regarding additional investigative leads, potential subpoena requests, and issues regarding same.	6.00 200.00/hr	1,200.00
JAG	Summarize discovery and Texas Senate impeachment trial procedures.	6.25 50.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
7/11/2023 TW	Continue summarizing witness documents.	1.75 50.00/hr	NO CHARGE
7/12/2023 RH	Attendance at weekly team meeting to discuss various issues and to update team on individual developments; telephone conference with House Manager for further discussion about strategy; continue review of documents in preparation for interviews.	3.75 500.00/hr	1,875.00
RH	Telephone call with Armie Lewis regarding witness interviews.	0.25 500.00/hr	125.00
LH	Team meeting regarding case strategy; review discovery order; prepare comparison of order and Paxton request; file notice regarding recent filings; team call regarding open records request; Zoom meeting with Board of Managers.	9.50 500.00/hr	4,750.00
AD	Team meeting.	0.75 500.00/hr	NO CHARGE
ACL	Trial team call; telephone call regarding scheduling of witness interviews with Rusty Hardin; telephone call with witnesses and witness attorneys for witness interview scheduling.	1.00 500.00/hr	500.00
JY	Review documents; prepare for interviews of witnesses.	7.00 200.00/hr	1,400.00
ZT	Talk with Leah Graham about meetings and ask questions regarding trial.	1.50 50.00/hr	NO CHARGE
TS	Update Leah Graham on the Kenneth Paxton case.	1.00 50.00/hr	NO CHARGE
JAG	Summarize discovery and Texas Senate impeachment trial procedures.	7.00 50.00/hr	NO CHARGE
TW	Continue summarizing witness documents.	0.50 50.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
7/13/2023	RH	Review documents and multiple telephone calls with team to discuss tasks to complete.	2.50 500.00/hr	1,250.00
	LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; prepare for upcoming production; attention to logistics for same; meeting with potential source, Mark White, Board of Managers lawyers, and Jim Yarbrough regarding expert preparation.	8.75 500.00/hr	4,375.00
	LH	Meet and confer with Chris Hilton and Daniel Dutko regarding production of documents; meeting with Leah Graham and Stella Jares regarding document production.	7.00 500.00/hr	3,500.00
	SJ	Participate in team meeting to discuss production issues and case strategy; multiple conferences with Leah Graham and Lara Hollingsworth regarding plan to produce documents to Paxton's counsel; continue to review documents for production.	7.00 200.00/hr	1,400.00
	JY	Preparation for meeting with witness; meeting with potential source, Mark White, Board of Managers lawyers ,and Leah Graham to discuss what documents to give to fraud expert.	8.00 200.00/hr	1,600.00
	ZT	Continue research for trial.	2.75 50.00/hr	NO CHARGE
	TS	Continued researching OAG opinions on COVID.	3.50 50.00/hr	NO CHARGE
	JAG	Draft memo for Leah Graham regarding OAG statements and summarize research.	6.50 50.00/hr	NO CHARGE
	CD	Receipt and review of responses to requests; discussion with House Board of Managers lawyer and counsel.	1.00 500.00/hr	500.00

			HRS/RATE	AMOUNT
7/14/2023	RH	Telephone conference with investigating and trial team to discuss tactics and discovery approach in light of Ken Paxton lawyers refusal to acknowledge confidentiality.	1.00 500.00/hr	500.00
	RH	Review documents and interviews in preparation for trial and future interviews.	3.50 500.00/hr	1,750.00
	LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; prepare for upcoming production; attention to logistics relating to same; meeting with Lara Hollingsworth regarding document production.	7.50 500.00/hr	3,750.00
	LH	Review email and draft response regarding meet and confer with counsel and Daniel Dutko regarding document production; meeting with Leah Graham regarding document production issue; telephone conference with Board of Managers lawyer and House lawyer regarding potential issue with document production; telephone conference with Rusty Hardin and Daniel Dutko regarding same; telephone conference with Board of Managers lawyer regarding privilege.	8.00 500.00/hr	4,000.00
	JB	Attend group conference call regarding waiver of privilege issue; review e-mail correspondence regarding waiver of privilege issue.	1.00 500.00/hr	500.00
	DD	Meet and confer with counsel and Lara Hollingsworth regarding response and document production; telephone with Rusty Hardin and Lara Hollingsworth regarding same.	1.00 500.00/hr	500.00
	SJ	Multiple team meetings regarding scope of initial production to Paxton team; continue to review documents; finalize production and send all counsel link to same; begin preparation of documents for attorney use at witness interviews.	9.50 200.00/hr	1,900.00

		HRS/RATE	AMOUNT
7/14/2023 ZT	Research for trial.	1.00 50.00/hr	NO CHARGE
TS	Research opinions on COVID.	2.75 50.00/hr	NO CHARGE
JA	G Draft memo for Leah Graham regarding OAG statements and continue summarizing research; summarize Nate Paul's deposition.	7.00 50.00/hr	NO CHARGE
7/15/2023 RH	Review documents, correspondence, and chronology in preparation for trial and upcoming interviews; review and edit of letter response to Hilton regarding his inflammatory letter of 7/14/23.	5.00 500.00/hr	2,500.00
LM	G Continue to review and analyze witness interviews; continue to prepare attorney work product relating to same; telephone conference with Lara Hollingsworth, Board of Managers lawyer, Jenny Brevorka, and Stella Jares regarding document production.	2.50 500.00/hr	1,250.00
LH	Emails with opposing counsel regarding confidentiality of Article 39.14 documents; prepare response to meet and confer email; telephone conference with Board of Managers lawyer, Jenny Brevorka, Stella Jares, and Leah Graham regarding document production.	4.00 500.00/hr	2,000.00
JB	Attend and participate in conference call regarding document production; review correspondence relating to document production.	0.50 500.00/hr	250.00
SJ	Team call to discuss production issues; continue to work on documents for attorney use.	1.00 200.00/hr	200.00
7/16/2023 RH	Telephone conference with Jim Yarbrough regarding upcoming interviews and updates on his and others interview with witness.	0.50 500.00/hr	250.00
RH	Review and edit letter to opposing counsel correcting multiple misstatements in Chris Hilton letter of 7/14/23 recounting his revision of specific	3.00 500.00/hr	1,500.00

		HRS/RATE	AMOUNT
	meet and confer conference on Friday, the 14th; multiple telephone calls with Lara Hollingsworth regarding merits and language of response letter; telephone conference with Lara Hollingsworth regarding discovery request for confidentiality of documents produced; review and edit of letter to Hilton regarding his letter about production dated 7/14/23.		
7/16/2023 LH	Research and draft request to clarify court's discovery order or motion for protection; edit response to Paxton's email regarding meet and confer; multiple telephone calls with Rusty Hardin regarding same.	6.50 500.00/hr	3,250.00
JB	Review and revise correspondence to opposing counsel regarding discovery production; review email correspondence from opposing counsel regarding discovery issues; review and edit protective order motion; review e-mail correspondence regarding interviews pertaining to World Class Holdings.	1.50 500.00/hr	750.00
SJ	Continue preparation of documents for attorney use at interviews.	5.00 200.00/hr	1,000.00
JY	Preparation for upcoming interview of witness; telephone conference with Rusty Hardin regarding upcoming interviews and interview updates.	2.00 200.00/hr	400.00
7/17/2023 RH	Interview with witness regarding previous litigation.	2.00 500.00/hr	1,000.00
RH	Review letter from Paxton counsel to Lt. Governor; strategize with Lara Hollingsworth and Jenny Brevorka regarding motion for protective order and clarification; draft response letter to opposing counsel regarding their additional discovery demands; review motion for clarification of protective order; conference with Jenny Brevorka regarding Lara Hollingsworth's revisions to letter.	500 00/hr	1,250.00

		HRS/RATE	AMOUNT
7/17/2023 LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; compile documents in anticipation of upcoming meeting with witness; prepare for and attend same; conference with Armie Lewis and Stella Jares regarding preparation of documents for attorney use at interviews.	11.75 500.00/hr	5,875.00
LH	Review Paxton motion requesting privilege log, alleged waiver of privilege, and other demands; draft and file request to clarify order or motion for protections.	13.00 500.00/hr	6,500.00
JB	Review emails regarding discovery dispute with opposing counsel; review letter from opposing counsel regarding discovery dispute; draft response letter to opposing counsel regarding their additional discovery demands; review motion for clarification of protective order; conference with Rusty Hardin regarding Lara Hollingsworth's revisions to letter; revise and edit letter to Lt. Gov. Dan Patrick.	7.25 500.00/hr	3,625.00
ACL	Draft outline for witness interviews of Witness 1, Witness 2, Witness 3, Witness 4, Witness 5, and Witness 6; review documents regarding witness interviews of Witness 1, Witness 2, Witness 3, Witness 4, Witness 5, and Witness 6; confer with Stella Jares regarding same.	4.50 500.00/hr	2,250.00
SJ	Continue to work on preparation of documents for attorney use at interviews; multiple conferences with Armie Lewis and with Leah Graham to discuss same.	7.50 200.00/hr	1,500.00
JY	Preparation for all upcoming interviews this week.	7.00 200.00/hr	1,400.00
TS	Review and analysis of Uber Subpoena and review OAG COVID opinions.	7.00 50.00/hr	NO CHARGE
JAG	Continue summarizing Senate impeachment procedures.	7.00 50.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
7/18/2023 RH	Travel to Austin; interviews with Witness 1 and Witness 2; telephone call with Board of Managers lawyer, Dick DeGuerin, Leah Graham, and FBI regarding document production and potential issues.	8.00 500.00/hr	4,000.00
LMG	Telephone call with Board of Managers lawyer, Rusty Hardin, Dick DeGuerin, and FBI regarding document production and potential issues relating to same; continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; continue preparation of documents for attorney use at interviews; extended meeting with Stella Jares regarding subpoenas and productions.	13.50 500.00/hr	6,750.00
LH	Telephone conference with Board of Managers lawyer, Dick DeGuerin, Rusty Hardin, Jenny Brevorka, and FBI regarding document production; emails regarding issuance of subpoenas.	1.50 500.00/hr	750.00
JB	Travel to Austin for interviews; participate in witness interviews; review email correspondence regarding subpoenas; review response to motion for clarification of protective order; prepare for witness interviews; attend conference call regarding subpoenas.	8.00 500.00/hr	NO CHARGE
ACL	Travel to Austin for witness interviews of Witness 1, Witness 2, Witness 3, Witness 4, Witness 5, and Witness 6; interview Witness 2; attend interview of Witness 1; draft memo and notes regarding Witness 2 interview; draft memo and notes regarding Witness 1 interview; multiple conferences with Stella Jares regarding preparation of documents for attorney use at interviews.	8.00 500.00/hr	4,000.00
RG	Attention to background; evaluate factual issues.	6.50 500.00/hr	3,250.00
CD	Complete draft of opinion letter; emails and calls with counsel for editing.	3.00 500.00/hr	1,500.00

		HRS/RATE	AMOUNT
7/18/2023 SJ	Update subpoenas chart; review financial documents and mark relevant documents for expert to review; extended conference with Leah Graham regarding subpoenas and next production to Paxton's counsel; upload latest production from OAG; receive and review files received from lawyer for witness.	7.00 200.00/hr	1,400.00
JY	Travel to Austin for interviews; participate in witness interviews; review email correspondence regarding subpoenas; prepare for next day interviews.	8.00 200.00/hr	1,600.00
TS	Continue review and analysis of Uber Subpoena.	4.00 50.00/hr	NO CHARGE
JAG	Continue summarizing Texas Senate impeachment procedures.	6.50 50.00/hr	NO CHARGE
7/19/2023 RH	Participate in interviews with Witness 1 and Witness 2; review documents in preparation for interviews scheduled the next day.	10.00 500.00/hr	5,000.00
RH	Telephone conference with Lara Hollingsworth, Dick DeGuerin, Jenny Brevorka, and Leah Graham regarding responses to Paxton filings.	1.00 500.00/hr	500.00
LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; continue preparation of documents for attorney use at interviews; prepare for upcoming document production; attention to issues relating to same.	9.25 500.00/hr	4,625.00
LH	Review Paxton response to motion for protection or clarification of Senate rules regarding confidentiality; telephone conference with Rusty Hardin, Jenny Brevorka, and Dick DeGuerin regarding responses to Paxton filings; hiring of Ross Garber; the production of documents; attend team meeting.	3.25 500.00/hr	1,625.00

			HRS/RATE	AMOUNT
7/19/2023	JB	Attend and participate in witness interviews; prepare for witness interview of Witness 1 and Witness 2; review email correspondence pertaining to case.	10.00 500.00/hr	NO CHARGE
	JB	Telephone conference with Rusty Hardin, Lara Hollingsworth, Dick DeGuerin, and Leah Graham regarding responses to Paxton filings.	1.00 500.00/hr	500.00
	AD	Media monitoring; send media report to team.	1.75 500.00/hr	NO CHARGE
	ACL	Attend interview of Witness 1; attend interview Witness 2; draft memo and notes regarding Witness 1 interview; draft memo and notes regarding Witness 2 interview.	10.50 500.00/hr	5,250.00
	LBH	Continue researching possibility of judicial review.	3.25 300.00/hr	975.00
	RG	Attention to legal issues; attention to status; attention to procedural issues.	7.25 500.00/hr	3,625.00
	SJ	Continue reviewing latest document productions.	4.00 200.00/hr	800.00
	JY	Attend and participate in witness interviews and return to Houston.	10.00 200.00/hr	2,000.00
	TS	Continue review and analysis of Uber Subpoena; additional research for trial.	7.00 50.00/hr	NO CHARGE
	JAG	Continue summarizing Texas Senate impeachment procedures.	7.00 50.00/hr	NO CHARGE
7/20/2023	RH	Interview Witness 1 and Witness 2; conference with Lara Hollingsworth and Daniel Dutko regarding subpoenas and discovery; conference with Jenny Brevorka regarding court order regarding discovery.	12.00 500.00/hr	6,000.00

		HRS/RATE	AMOUNT
7/20/2023 LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; attention to issues relating to document production and subpoena responses; continue preparation of documents for attorney use at interviews; attention to issues relating to same; communications with Lara Hollingsworth and Stella Jares regarding production; conference call with Jenny Brevorka regarding discovery.	12.75 500.00/hr	6,375.00
LH	Telephone conference with Jenny Brevorka regarding issues with production and confidentiality; draft notice to Senate regarding confidentiality; telephone conference with Rusty Hardin and Daniel Dutko regarding same; review court's order regarding production; communications with Leah Graham and Stella Jares regarding production.	3.25 500.00/hr	1,625.00
JB	Prepare for witness interviews; participate in group call regarding subpoenas and discovery logistics; telephone call with Stacey Manela regarding contract; telephone conference with Lara Hollingsworth regarding letter to Senate pertaining to discovery order; review court order; telephone discussions with Leah Graham regarding discovery, production and discovery order; discussions with Rusty Hardin regarding court order on discovery and productions; review email from Stella Jares regarding discovery matters.	3.00 500.00/hr	1,500.00
DD	Telephone conference with Rusty Hardin and Lara Hollingsworth regarding notice to Senate regarding confidentiality.	1.25 500.00/hr	625.00
JB	Participate in witness interviews of Witness 1 and Witness 2.	12.00 500.00/hr	NO CHARGE
AD	Media monitoring.	0.50 500.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
7/20/2023	ACL	Attend Interview of Witness 1 and Witness 2; telephone call with team regarding logistics; travel back to Houston from Austin.	12.00 500.00/hr	6,000.00
	RG	Attention to background.	5.75 500.00/hr	2,875.00
	SJ	Continue to upload and review latest document productions; attention to subpoenas issued; team call regarding next productions; respond to team emails regarding subpoenas.	10.50 200.00/hr	2,100.00
	JAG	Continue summarizing Texas Senate impeachment procedures.	7.00 50.00/hr	NO CHARGE
	TS	Research regarding witness; continue analysis of Uber Subpoena.	6.00 50.00/hr	NO CHARGE
7/21/2023	RH	Review documents in preparation for trial; conference call with Lara Hollingsworth regarding motion to challenge jurors; conference call with Jenny Brevorka regarding discovery issues.	4.00 500.00/hr	2,000.00
	RH	Telephone conference with Lara Hollingsworth regarding draft response and motion to challenge jurors; telephone conference with Jenny Brevorka regarding discovery issues.	0.50 500.00/hr	250.00
	LH	Review Paxton's motion to challenge jurors; telephone conference with Harriet O'Neill regarding same; draft response and file with Senate; telephone conference with Rusty Hardin regarding same; telephone conference with client regarding motion to challenge jurors.	3.00 500.00/hr	1,500.00
	JB	Review motion to recuse jurors filed by opposing counsel; correspondence with impeachment team about motion and response; telephone discussion with Board of Managers lawyer about subpoenas and investigation; review Witness 1 interview notes and Witness 1 affidavit; telephone conference with Rusty Hardin regarding discovery issues; review research on motion to recuse;	3.00 500.00/hr	1,500.00

			HRS/RATE	AMOUNT
		discussions with Stella Jares regarding discovery production.		
7/21/2023	AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
j	ACL	Draft memo of witness interview.	6.00 500.00/hr	3,000.00
I	RG	Attention to legal issues; attention to procedural issues.	5.50 500.00/hr	2,750.00
\$	SJ	Continue to upload and review latest document productions; finalize and send productions to opposing counsel; discussions with Jenny Brevorka regarding discovery production.	5.25 200.00/hr	1,050.00
j	MV	Create binders for all cases, regulations, and congressional journals with highlights on pin cite to the motion challenging jurors with cause exhibits.	4.00 100.00/hr	NO CHARGE
1	ММС	Create binder of all cases, relations and congressional journals with highlights on pin cites to the motions challenging jurors for cause with exhibits.	1.75 100.00/hr	NO CHARGE
•	TS	Continue research regarding witness; continue review and analysis of Uber Subpoena.	7.00 50.00/hr	NO CHARGE
\$	JAG	Summarize Texas Senate impeachment procedures; review interview notes.	7.00 50.00/hr	NO CHARGE
•	TW	Review notes from Austin interviews.	0.75 50.00/hr	NO CHARGE
7/22/2023	RH	Continue review of materials including previous interviews of witnesses.	5.00 500.00/hr	2,500.00
I	LH	Research legal issues regarding: impeachment proceedings in preparation for motions and responses; meeting with Jenny Brevorka, Lisa Hobbs, Ross Garber, and Harriet O'Neill	2.75 500.00/hr	1,375.00

		HRS/RATE	AMOUNT
	regarding legal issues and draft of motions and responses; prepare memo regarding same.		
7/22/2023 AD	Media monitoring.	1.00 500.00/hr	NO CHARGE
AC	L Draft memo regarding witness interview.	3.00 500.00/hr	1,500.00
RG	Attention to legal issues; attention to procedural issues.	7.00 500.00/hr	3,500.00
7/23/2023 JB	Review interview notes from investigator's interviews and trial preparation interviews; review memo circulated by counsel; review e-mail correspondence about Mitte Foundation litigation and video clip involving appearance before Senate committee on hiring of witness.	2.50 500.00/hr	1,250.00
AD	Media monitoring.	1.00 500.00/hr	NO CHARGE
RG	Attention to legal and procedural issues.	5.75 500.00/hr	2,875.00
SJ	Upload DPS production of video files of dumpster fire; email opposing counsel regarding same; initial review of Alliance Bank records; provide same to expert for his review; send documents to counsel for use in upcoming witness interviews.	4.00 200.00/hr	800.00
7/24/2023 LM	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; prepare for upcoming production; attention to issues relating to same; meeting with Stella Jares regarding document review; meeting with Jenny Brevorka regarding database and production issues; conference with Jim Yarbrough regarding interviews.	11.50 500.00/hr	5,750.00

		HRS/RATE	AMOUNT
7/24/2023 LH	Research various legal issues regarding impeachment proceedings in preparation for motions and responses; emails with client regarding same; meeting with Leah Graham regarding documents in support of motions and responses.	4.50 500.00/hr	2,250.00
JB	Review motions filed by opposing counsel; review chronology and witness information; e-mail correspondence with Stacey Manela regarding review of materials for starting work; e-mail correspondence with counsel and Stella Jares regarding expert witness and engagement letter; telephone call with Armie Lewis regarding witness interviews; telephone call with Leah Graham regarding document database and production issues.	4.00 500.00/hr	2,000.00
AD	Media monitoring.	1.00 500.00/hr	NO CHARGE
ACL	Telephone call regarding interview scheduling; telephone call with Jenny Brevorka regarding status of scheduling and tasks; updating task list and calendar regarding upcoming tasks; telephone call with House of Managers lawyers regarding scheduling; conference with Jim Yarbrough regarding upcoming witness interviews; confer with Stella Jares regarding documents for attorney use in interviews.	4.50 500.00/hr	2,250.00
LBH	Continue researching possibility of judicial review.	1.75 300.00/hr	525.00
RG	Attention to legal issues; attention to factual issues.	5.00 500.00/hr	2,500.00
SJ	Meeting with Leah Graham regarding document review; conference with Armie Lewis regarding next set of documents for attorney use; upload latest subpoenaed productions to database; revise chart accordingly; make latest financial documents available to expert; coordinate sending witness's audio recordings to court reporter for transcription.	7.50 200.00/hr	1,500.00

			HRS/RATE	AMOUNT
7/24/2023	JY	Conference with Leah Graham regarding interviews; conference with Armie Lewis regarding upcoming interviews; review discovery.	4.00 200.00/hr	800.00
	TS	Complete analysis and review of Uber Subpoena; complete research regarding witness.	7.00 50.00/hr	NO CHARGE
	JBH	Continue reviewing James Ferguson's impeachment trial procedure.	2.00 50.00/hr	NO CHARGE
	TW	Summarize witness documents.	0.75 50.00/hr	NO CHARGE
7/25/2023	RH	Review documents, including previous interviews of witnesses.	2.00 500.00/hr	1,000.00
	LH	Review, research, and draft response to motion to quash and bill of particulars; telephone conference with Jenny Brevorka regarding trial logistics; emails with House counsel regarding telephone conference.	8.50 500.00/hr	4,250.00
	LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; finalize and serve supplemental production; attention to issues relating to same; confer with Stella Jares and Jenny Brevorka regarding production.	10.25 500.00/hr	5,125.00
	JB	Correspondence regarding witness and service of subpoena; review motion to quash and demand for bill of particulars; correspondence with law clerks regarding assembling research from motion to quash and bill of particulars demand; conference call with Lara Hollingsworth regarding motions and deadlines; conference call with Stella Jares and Leah Graham relating to production issues and discovery; correspondence with Aisha Dennis regarding media research on witnesses; summarize court testimony of Witness 1 and Witness 2 for preparation of documents	6.25 500.00/hr	3,125.00

		HRS/RATE	AMOUNT
	for attorney's use at trial; direct Armie Lewis regarding summarizing testimony.		
7/25/2023 AD	Media monitoring.	1.25 500.00/hr	NO CHARGE
ACL	Update task list and calendar; phone call with Jim Yarbough and witness; phone calls and editing schedule for upcoming witness interviews; draft witness summary of witness interview; confer with Jenny Brevorka regarding summarizing testimony.	6.75 500.00/hr	3,375.00
RG	Attention to issues regarding factual and procedural background; attention to legal issues.	8.00 500.00/hr	4,000.00
SJ	Conference call with Jenny Brevorka and Leah Graham regarding case tasks status; prepare documents for attorney's use for Witness 1 and Witness 2; handle retention of expert; finalize and send 4th supplemental document production to opposing counsel.	4.00 200.00/hr	800.00
JY	Review discovery; phone calls to witnesses; phone call with Armie Lewis and witness.	4.25 200.00/hr	850.00
MV	Compile cases, codes and House journal citations for motion to quash for Jennifer Brevorka and Lara Hollingsworth.	6.25 100.00/hr	NO CHARGE
ММС	Compile cases, codes and House journal citations for motion to quash for Jennifer Brevorka and Lara Hollingsworth.	5.00 100.00/hr	NO CHARGE
TS	Review OAG's opinions and complete project related to Uber Subpoena.	7.00 50.00/hr	NO CHARGE
JBH	Continue reviewing James Ferguson's impeachment trial procedure.	4.00 50.00/hr	NO CHARGE
TW	Review pleadings and summarize witness documents; attend discovery meeting.	1.00 50.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
7/26/2023	RH	Telephone conference with House Manager regarding update on case; participate in weekly call with litigation team regarding scheduled interviews.	2.00 500.00/hr	1,000.00
	LH	Research and draft responses to motion to quash and bill of particulars; meeting with House Managers on case strategy; telephone conference with Board of Managers lawyers regarding legal issues.	8.00 500.00/hr	4,000.00
	LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; prepare for upcoming production; attention to issues relating to same; prepare for and attend meeting with investigative team members regarding open records article of impeachment; prepare for and attend weekly impeachment strategy and status update meeting.	11.75 500.00/hr	5,875.00
	JB	Attend call with Leah Graham, Board of Managers lawyers regarding open records' issue and documents supporting that article of impeachment; strategize with Leah Graham, Lara Hollingsworth, and Rusty Hardin regarding response to motion to quash and demand for bill of particulars; research legislative immunity under Texas Government Code; review research by law clerks on cases cited in motion to protect Ken Paxton from testifying.	3.50 500.00/hr	1,750.00
	JB	Attend House Board of Managers meeting; attend weekly Zoom meeting with team; attend meeting with House counsel and motions team regarding motions; attend Zoom with motions writing group.	2.00 500.00/hr	NO CHARGE
	AD	Media monitoring.	1.00 500.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
7/26/2023 ACL	Draft witness summary of Witness 1 interview; draft witness summary of Witness 2 interview; draft witness summary of Witness 3 nterview.	5.00 500.00/hr	2,500.00
ACL	Weekly update phone call with trial team; schedule August witness interviews; meeting with Jim Yarbrough regarding interviews.	2.00 500.00/hr	NO CHARGE
LBH	Conference with legal team; research legal issues anticipated in motions.	2.50 300.00/hr	750.00
RG	Attention to legal issues.	6.25 500.00/hr	3,125.00
SJ	Zoom meeting with Leah Graham, Jenny Brevorka, and Board of Managers lawyers to discuss impeachment article regarding Open Records Act; as well as related key documents and chronology; weekly full team meeting to discuss case progress and strategy; uploaded latest productions into database; continue preparation of documents for attorney use at interviews.	7.00 200.00/hr	1,400.00
JY	Meetings with Armie Lewis regarding interviews; meeting with Leah Graham regarding discovery; team meeting to discuss strategy; review discovery and interviews; telephone conference with Board of Managers staff and Board of Managers lawyer; phone and email communications with counsel regarding engagement of forensic expert.	5.25 200.00/hr	1,050.00
MV	Create document of cases, law journals, Texas Constitution sections, and/or codes cited in the motion from opposing counsel for Jennifer Brevorka.	4.00 100.00/hr	NO CHARGE
MMC	Review witness interview; create summary; create document containing cases, law journals, Texas Constitution sections, and codes cited in the motion from opposing counsel.	4.00 100.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
7/26/2023	TW	Draft potential arguments.	0.50 50.00/hr	NO CHARGE
	TS	Review documents and complete final Uber document.	7.00 50.00/hr	NO CHARGE
	JBH	Continue reviewing James Ferguson's impeachment trial procedure.	4.00 50.00/hr	NO CHARGE
7/27/2023	RH	Review and return various emails from team regarding case.	1.00 500.00/hr	500.00
	LH	Research and draft responses to motion to quash and bill of particulars; emails with House counsel regarding research on forgiveness doctrine; review precinct chair letter; telephone conference with House Managers and Ross Garber regarding forgiveness doctrine.	8.00 500.00/hr	4,000.00
	LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; attention to issues relating to upcoming motions deadline and motion/response relating to Prior Term/Forgiveness doctrine.	5.50 500.00/hr	2,750.00
	JB	Direct research of law clerk on impeachment and difference from criminal proceedings; research and review materials pertaining to Forgiveness Doctrine and question of how impeachment differs from criminal proceedings.	2.00 500.00/hr	1,000.00
	ACL	Draft witness summary of Witness 1 interview; draft witness summary of Witness 2 interview.	8.50 500.00/hr	4,250.00
	AD	Media monitoring.	1.75 500.00/hr	NO CHARGE
	RG	Attention to legal issues.	6.75 500.00/hr	3,375.00
	SJ	Upload latest subpoenaed document productions into database; continue preparation of documents for attorney use at interviews.	4.50 200.00/hr	900.00

		HRS/RATE	AMOUNT
7/27/2023 JY	Work on scheduling of interviews; attempts to help in service of witness; communications with DPS; research and send information on subpoenas for cellular records; communications with Board of Managers lawyer, Leah Graham, Armie Lewis, and Board of Managers staff.	7.00 200.00/hr	1,400.00
MV	Confer with Jenny Brevorka regarding impeachment research; begin research supporting that impeachment proceeding is not a criminal trial.	8.25 100.00/hr	NO CHARGE
TS	Review of drafts and final reports.	7.00 50.00/hr	NO CHARGE
JBH	Continue reviewing James Ferguson's impeachment trial procedure.	4.00 50.00/hr	NO CHARGE
7/28/2023 RH	Review and return various emails from team regarding case.	1.00 500.00/hr	500.00
LH	Research and draft responses to motion to quash and bill of particulars; legal team emails and calls regarding drafting of motions and responses.	9.00 500.00/hr	4,500.00
LMG	Continue to review, analyze, and organize client documents; continue to prepare attorney work product relating to same; attention to issues relating to subpoena responses and upcoming motions deadlines; conferences with Stella Jares regarding OAG production issues.	6.50 500.00/hr	3,250.00
JB	Revise and edit motion material for Forgiveness Doctrine motion; research for Forgiveness Doctrine motion.	4.75 500.00/hr	2,375.00
AD	Media monitoring.	0.75 500.00/hr	375.00
ACL	Draft witness summary of Witness 1 initial interview; draft witness summary of Witness 2 initial interview; draft witness summary for Witness 3 initial interview.	7.50 500.00/hr	3,750.00

			HRS/RATE	AMOUNT
7/28/2023	RG	Attention to issues regarding impeachment trial.	7.00 500.00/hr	3,500.00
	LBH	Continue researching legal issues in anticipation of motions; begin drafting motion to exclude evidence of House process.	3.25 300.00/hr	975.00
	SJ	Upload additional document collections into database; prepare supplemental production and forward same to opposing counsel; several conferences with Leah Graham and Board of Managers lawyer regarding OAG production issues; continue reparation of documents for attorney use at interviews.	9.50 200.00/hr	1,900.00
	JY	Review discovery.	3.25 200.00/hr	650.00
	MV	Continue impeachment research and compile additional cases for review.	3.75 100.00/hr	NO CHARGE
	MMC	Continue summary of witness interview.	1.50 100.00/hr	NO CHARGE
	TS	Review and compare OAG reports.	7.75 50.00/hr	NO CHARGE
7/29/2023	RH	Review and return various emails from team regarding case.	1.00 500.00/hr	500.00
	LH	Research on House process and Senate responses; draft section of motions and responses regarding: same; review reply to notices regarding responses.	9.50 500.00/hr	4,750.00
	LMG	Attention to issues relating to Prior Term/Forgiveness doctrine and upcoming motions deadline; compile documents for factual background section regarding same; work with Jenny Brevorka to draft same.	9.50 500.00/hr	4,750.00

		HRS/RATE	AMOUNT
7/29/2023 JE	B Revise and edit fact section for Forgiveness Doctrine motion; correspondence and telephone call with Leah Graham about revisions.	2.75 500.00/hr	1,375.00
A	CL Draft witness summary for initial witness interview.	1.00 500.00/hr	500.00
R	G Attention to issues regarding impeachment trial.	2.25 500.00/hr	1,125.00
LE	BH Continue drafting Motion to Exclude Evidence of House Process; begin analysis of Senate Rules in anticipation of Motion to Clarify Rules.	4.50 300.00/hr	1,350.00
7/30/2023 RI	H Review and return various emails from team regarding case.	1.50 500.00/hr	750.00
Lŀ	H Research on House process and Senate responses; draft section of motions and responses regarding same; review reply to notices regarding responses; review prior impeachment proceeding records.	13.00 500.00/hr	6,500.00
LE	BH Draft Motion to Clarify Rules.	3.25 300.00/hr	975.00
S	J Continue to upload additional document collections into database; preparation of documents for attorney use at interviews of Witness 1 and Witness 2.	4.00 200.00/hr	800.00
7/31/2023 RI	H Meeting with team to discuss motion to dismiss.	1.25 500.00/hr	625.00
RI	H Review material in preparation for witness interviews.	2.00 500.00/hr	1,000.00
LH	H Research on House process and Senate responses; draft section of motions and responses regarding same; review and research motions based on forgiveness doctrine; meeting with legal team regarding same; confer with	10.25 500.00/hr	5,125.00

		HRS/RATE	AMOUNT
	Jenny Brevorka regarding attorney proffer.		
7/31/2023 LMG	Review and analyze Paxton's motions to dismiss based on the prior term and forgiveness doctrine; review evidence cited in support of same; prepare for and attend strategy meeting regarding response and upcoming motions deadlines; continue to review, analyze, and organize client documents for use in upcoming motions and responses and in anticipation of upcoming supplemental production.	12.25 500.00/hr	6,125.00
JB	Review motion to dismiss and motion to exclude filed by opposing counsel; direct research on articles discussed in exhibit A to motion and case law cited in motions; review factual materials cited in motions; attend team meetings to discuss motions; review correspondence from investigative team about investigative matters; review and edit subpoenas; correspondence with Board of Managers lawyer about contents of subpoenas; confer with Lara Hollingsworth and Board of Managers lawyer about attorney proffer.	5.25 500.00/hr	2,625.00
ACL	Draft witness interview summary regarding witness; phone call regarding pretrial motions with Rusty Hardin, Dick DeGuerin, Leah Graham, Jenny Brevorka, Lara Hollingsworth, Harriet O'Neill, and Ross Garber; meeting with Leah Graham and Jenny Brevorka regarding drafting of factual narrative; review OAG reports for factual discrepancies.	5.50 500.00/hr	2,750.00
AD	Media monitoring.	1.50	NO CHARGE
RG	Attention to impeachment proceedings.	500.00/hr 7.50 500.00/hr	3,750.00
LBH	Edit and revise Motion to Exclude Evidence and Motion to Clarify Rules; finalize and circulate Motion to Exclude.	3.00 300.00/hr	900.00

		HRS/RATE	AMOUNT
7/31/2023 SJ	Continue to upload additional document collections into database and forward same to financial expert; preparation of documents for attorney use at interviews.	5.00 200.00/hr	1,000.00
MV	Create single document of the cases, law journals, Texas Constitution sections, and/or code cited in the motion from opposing counsel.	4.25 100.00/hr	NO CHARGE
ММ	C Create single document of the cases, law journals, Texas Constitution sections and/or cited in the motion from opposing counsel for review; continue summary of witness interview.	7.00 100.00/hr	NO CHARGE
TS	Review Attorney General's Lewis Brisbois report and the Motion to Dismiss articles of impeachment.	6.00 50.00/hr	NO CHARGE
8/1/2023 RH	Meeting with team regarding strategy; participate in call regarding legal issues.	4.00 500.00/hr	2,000.00
JB	Attend meetings on legal issues and motions; attend meeting about trial logistics with Rusty Hardin, Jim Yarbrough, Leah Graham, Armie Lewis, and Stella Jares; e-mail correspondence with investigators about subpoenas.	4.50 500.00/hr	2,250.00
LH	Research on House process and Senate responses; draft section of motions and responses regarding same; review and research motions based on forgiveness doctrine; telephone conference with House Managers regarding same; edit motion on House process.	10.00 500.00/hr	5,000.00
LMG	Attend meeting about trial logistics with Rusty Hardin, Jim Yarbrough, Jenny Brevorka, Armie Lewis, and Stella Jares; review document production and prepare attorney work product regarding same; attention to issues relating to subpoenas and Forgiveness Doctrine; prepare and compile materials for upcoming interviews of Witness 1 and Witness 2.	5.00 500.00/hr	2,500.00
CD	Conference call with lawyers on impeachment team review of motion to quash subpoena and need for response.	; 1.25 500.00/hr	625.00

		HRS/RATE	AMOUNT
8/1/2023 ACL	Review interview transcripts and summaries and highlight points for narrative in response to motion to dismiss; review OAG reports for factual discrepancies; review articles regarding what public knew at time of Paxton re-election.	7.50 500.00/hr	3,750.00
ACL	Review interview transcripts and summaries and highlight points for narrative in response to motion to dismiss; attend meeting about trial logistics with Rusty Hardin, Jim Yarbrough, Leah Graham, Jenny Brevorka, and Stella Jares.	2.00 500.00/hr	NO CHARGE
AD	Attention to preparation of documents for attorney use at interviews and news articles.	1.25 500.00/hr	625.00
AD	Media monitoring; attend team meeting.	2.50 500.00/hr	NO CHARGE
LBH	Finalize and circulate Motion to Clarify Rules; prepare memo analyzing Senate Rules to accompany same.	4.25 300.00/hr	1,275.00
RG	Research; conference call; evaluate pretrial issues; evaluate pretrial motions.	5.75 500.00/hr	2,875.00
SJ	RHA team meeting to discuss case strategy; review latest subpoenaed production; upload same to database; attention to OAG's reproduction of documents previously produced in response to House Managers' subpoenas; revise documents for attorney use at interviews.	8.50 200.00/hr	1,700.00
JY	Meeting with RHA team to discuss ongoing projects, assignments and strategy; review discovery.	5.75 200.00/hr	1,150.00
ММС	Finish interview summary of witness and forward final product to Armie Lewis, begin deposition summary of witness.	5.25 100.00/hr	NO CHARGE
ZT	Research articles from Kenneth Paxton's Motion To Dismiss.	6.00 50.00/hr	NO CHARGE

updates and strategy.

		HRS/RATE	AMOUNT
8/1/2023 TW	Compare discovery requests.	3.00 50.00/hr	NO CHARGE
8/2/2023 RH	Meet with Leah Graham, Lara Hollingsworth, and Jenny Brevorka regarding case update, strategy, and motion to exclude based on House process; telephone conference with Jenny Brevorka and Board of Managers lawyer regarding expert.	1.25 500.00/hr	625.00
LH	Attend Zoom meeting with House Managers; review motions to exclude based on House process; research regarding impeachment process and rights; telephone conference with House Manager regarding same; meeting with Rusty Hardin, Leah Graham, and Jenny Brevorka regarding motion to exclude based on House process.	10.00 500.00/hr	5,000.00
JB	Meet with Rusty Hardin, Leah Graham, Armie Lewis, Lara Hollingsworth, Stella Jares, Daniel Dutko, and Jim Yarbrough regarding case updates and strategy; review evidence for response to motion to dismiss; confer with Armie Lewis regarding chronology and witness summaries; review e-mails regarding subpoena productions; telephone discussion with Rusty Hardin and Board of Managers lawyer about expert; telephone call to counsel for witness; telephone calls with Board of Managers lawyers regarding trial preparation matters; attend House Board of Managers meeting; prepare for witness interviews; review and edit language for subpoena requests; direct interns in research needed for response to motions; correspondence with Jim Yarbrough regarding phone numbers associated with subpoena requests from witness; review production from Esther Blind Trust.	13.75 500.00/hr	6,875.00
DD	Meet with Rusty Hardin, Leah Graham, Armie Lewis, Lara Hollingsworth, Stella Jares, Jenny Brevorka, and Jim Yarbrough regarding case	2.00 500.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
8/2/2023 LMG	Continue to review and analyze documents; continue to prepare work product regarding same; attention to issues regarding Forgiveness Doctrine and motion to dismiss relating to same.	6.00 500.00/hr	3,000.00
LMG	Meeting regarding case strategy and updates; meeting regarding motion to exclude based on House process.	2.00 500.00/hr	NO CHARGE
ACL	Highlight and comment on interview transcripts and interview notes regarding factual narrative for motion to dismiss; review OAG reports regarding whistleblowers; draft written chronology; draft witness testimony portion for order of proof chart.	7.25 500.00/hr	3,625.00
ACL	Team meeting and conference with Jenny Brevorka regarding chronology and witness summaries.	2.00 500.00/hr	NO CHARGE
AD	Research for Jim Yarbrough on call detail records; preparation of Documents for Attorney Use at Interviews and news articles.	2.00 500.00/hr	1,000.00
AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
RG	Research; correspondence with co-counsel; conference call with co-counsel; attention to pretrial issues.	6.50 500.00/hr	3,250.00
SJ	Upload and review latest subpoenaed productions received; prepare supplemental production and serve same on opposing counsel; revise documents for attorney use at interviews.	6.00 200.00/hr	1,200.00
JY	Prepare for upcoming interviews; review discovery; correspondence with Jenny Brevorka regarding phone numbers associated with subpoena requests from witness.	4.00 200.00/hr	800.00
ММС	Continue witness summary of deposition concerning the Mitte Foundation.	1.50 100.00/hr	NO CHARGE
CD	Work on motion drafting and editing; two Zoom conferences with counsel; send proposed response and counter-motion to impeachment team lawyers.	5.00 500.00/hr	2,500.00

		HRS/RATE	AMOUNT
8/2/2023 ZT	Obtain articles from Kenneth Paxton's Motion To Dismiss.	5.50 50.00/hr	NO CHARGE
TS	Continue to review the motions to dismiss.	5.00 50.00/hr	NO CHARGE
8/3/2023 RH	Travel to Austin for interviews of Witness 1 and Witness 2; return to Houston; participate in interview of Witness 3.	16.50 500.00/hr	8,250.00
LH	Review House transcripts and Lewis Brisbois documents and Paxton subpoenas; research regarding trial time limits, Texas Rule of Evidence 611 and attorney-client privilege; edit motion to clarify Senate rules; edits to brief regarding attorney-client privilege; emails and telephone conference with legal team regarding same; telephone conference with Harriet O'Neill regarding privilege.	9.00 500.00/hr	4,500.00
JB	Travel to and from Austin for interviews; participate in interviews of Witness 1, Witness 2 and Witness 3.	16.50 500.00/hr	8,250.00
LMG	Continue to review and analyze documents produced in response to subpoenas; continue to prepare attorney work product related to same.	8.00 500.00/hr	4,000.00
ACL	Travel to Austin with Rusty Hardin, Jim Yarbrough and Jennifer Brevorka for Witness 1 and Witness 2 interviews; Witness 3 interview with Rusty Hardin, Jim Yarbrough, Jennifer Brevorka, Board of Managers lawyer, and Dick DeGuerin; Witness 2 interview with Rusty Hardin, Jim Yarbrough, Jennifer Brevorka, Board of Managers lawyer, and Dick DeGuerin; Witness 1 interview with Rusty Hardin, Jim Yarbrough, Jennifer Brevorka, Board of Managers lawyer, and Dick DeGuerin.	16.50 500.00/hr	8,250.00
AD	Media monitoring.	0.75 500.00/hr	NO CHARGE
CD	Continue working on motion drafting and editing.	3.00 500.00/hr	1,500.00

		HRS/RATE	AMOUNT
8/3/2023 RG	Telephone conference with client; telephone conference with co-counsel; correspondence with client; evaluate legal issues.	7.00 500.00/hr	3,500.00
SJ	Upload and review OAG supplemental production; upload to database and review latest financial records received and forward same to experts for their analysis; revise documents for attorney use at interviews; revise subpoena chart.	8.00 200.00/hr	1,600.00
MV	Gather authorities in Kenneth Paxton's most recent motion and highlight same.	6.25 100.00/hr	NO CHARGE
ZT	Compile articles from Kenneth Paxton's motions to dismiss.	6.00 50.00/hr	NO CHARGE
TS	Continue to review motions to dismiss.	5.00 50.00/hr	NO CHARGE
8/4/2023 RH	Travel to Nashville for interview with witness; attend interview with witness, and Armie Lewis; return to Houston (flight delayed); conference call with Lara Hollingsworth regarding research.	12.25 500.00/hr	6,125.00
LH	Review attorney notes regarding House process; research regarding disqualification, removal, and attorney-client privilege; telephone conference with Rusty Hardin regarding same; telephone conference with Harriett O'Neill regarding same; draft motion to amend Senate Rules 27 and 30a; telephone conference with legal team regarding attorney-client privilege briefing; review letter from witness; review emails regarding motion to clarify; edit motion to clarify; review witness documents; review Paxton's motion to dismiss Articles I, II, V, motion to exclude inadmissible evidence; emails regarding OAG subpoenas; review Buzbee statement to media.	9.75 500.00/hr	4,875.00
JB	Review and edit motion; review and edit language for subpoenas; review motions filed by opposing counsel; phone calls with potential witnesses; review correspondence regarding privilege issue.	4.75 500.00/hr	2,375.00

		HRS/RATE	AMOUNT
8/4/2023 LMG	Continue to review and analyze documents produced in response to subpoenas; continue to prepare attorney work product relating to same; review and analyze Paxton's motions to dismiss; continue to prepare materials for upcoming witness interviews.	8.00 500.00/hr	4,000.00
ACL	Travel to Nashville and then back to Houston with Rusty Hardin for interview of Witness 1; draft memo regarding Witness 2 interview; draft memos regarding Witness 3 interview and Witness 1 interview.	12.25 500.00/hr	6,125.00
AD	Media monitoring.	1.75 500.00/hr	NO CHARGE
RG	Attention to pretrial issues; correspondence with co-counsel; telephone conference with co-counsel; attention to legal issues; attention to pretrial matters.	4.50 500.00/hr	2,250.00
LBH	Edit and revise motions; review and respond to comments on Motion to Clarify; conduct additional research in support of Motion to Exclude.	2.50 300.00/hr	750.00
SJ	Continue to organize documents for attorney use at upcoming witness interviews; prepare additional documents for experts.	4.00 200.00/hr	800.00
MV	Continue to gather authorities cited in Kenneth Paxton's most recent motion to compel.	5.00 100.00/hr	NO CHARGE
ММС	Continue the witness summary of witness deposition concerning the Mitte Foundation.	2.00 100.00/hr	NO CHARGE
ZT	Compile articles from Kenneth Paxton's motions to dismiss.	6.00 50.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
8/4/2023 TS	Continue to review motions to dismiss; complete research regarding motion to exclude.	7.00 50.00/hr	NO CHARGE
8/5/2023 RH	Exchange text messages with lawyer representing one of the witnesses, to discuss scheduling.	0.25 500.00/hr	125.00
RH	Review materials and edit motions to be filed; review of motions filed by opposing side; meeting with team to plan for trial.	8.50 500.00/hr	4,250.00
LH	Edit and finalize motion to clarify; review witness interview notes; emails regarding attorney-client privilege research; review Paxton's motions; emails regarding motion to clarify.	9.25 500.00/hr	4,625.00
LMG	Attention to issues relating to pretrial motions; continue to review and analyze documents in response to subpoenas and prepare attorney work product relating to same; prepare responses to pretrial motions and compile evidence in support of same; correspondence with Jenny Brevorka and Board of Managers lawyer regarding subpoena production and subsequent subpoena; meeting with team regarding trial details and strategy.	14.50 500.00/hr	7,250.00
JB	Meet with Rusty Hardin, Leah Graham, and Lara Hollingsworth regarding motions and trial preparations; review materials in preparation for drafting a response to motions to dismiss; confer with Leah Graham and Board of Managers lawyer regarding subpoena production and subsequent subpoena; confer with Stella Jares regarding subpoena productions; review witness interview summaries circulated by Armie Lewis.	6.00 500.00/hr	3,000.00
LH	Meeting with Rusty Hardin, Jenny Brevorka, and Leah Graham regarding motion to clarify; emails regarding post-filing deadline meeting.	2.00 500.00/hr	NO CHARGE
ACL	Draft memo of Witness 1 interview; draft memo of Witness 2 interview; draft memo of Witness 3 interview; draft memo of Witness 4 interview; draft proof chart regarding witness testimony.	7.25 500.00/hr	3,625.00

		HRS/RATE	AMOUNT
8/5/2023 AD	Draft discovery timeline.	3.50 500.00/hr	1,750.00
RG	Attention to pretrial motions; correspondence with co-counsel.	3.00 500.00/hr	1,500.00
SJ	Confer with Jenny Brevorka regarding subpoena productions.	0.25 200.00/hr	50.00
8/6/2023 RH	Review motions to dismiss; review prior interviews and documents in preparation for trial.	7.00 500.00/hr	3,500.00
RH	Telephone conference with to discuss motions to dismiss.	1.25 500.00/hr	625.00
LH	Legal team meeting to discuss responding to Paxton motions; emails with House personnel regarding same; review Paxton motions; create task list for responses; outline responses; review attorney-client privilege documents; meeting with Leah Graham regarding response to no-evidence motion for summary judgment; emails with Jenny Brevorka regarding narrative; draft and research responses to 21 motions.	10.00 500.00/hr	5,000.00
JB	Attend meeting on response to motions; draft response to motion to dismiss; review materials for response to motion to dismiss; confer with Leah Graham, Lara Hollingsworth, and Rusty Hardin regarding response to motion to dismiss.	7.50 500.00/hr	3,750.00
LMG	Attention to issues relating to pretrial motions; attend meetings relating to same; continue to review and analyze client data and prepare attorney work product relating to same.	8.25 500.00/hr	4,125.00
LMG	Continue to prepare factual narrative sections for responses to motions to dismiss and compile evidence in support of same.	2.00 500.00/hr	NO CHARGE
CD	Zoom conference with entire impeachment team to discuss pre-trial list of motions and assignments for responsive action.	1.50 500.00/hr	750.00

		HRS/RATE	AMOUNT
8/6/2023 ACL	Draft proof chart regarding witness testimony.	3.50 500.00/hr	1,750.00
LBH	Review motions filed by Paxton in anticipation of phone conference with legal team to distribute workload; participate in phone conference with legal team.	3.25 300.00/hr	975.00
RG	Attention to legal issues; attention to pretrial motions; correspondence with co-counsel; telephone conference with co-counsel.	5.00 500.00/hr	2,500.00
SJ	Continue preparation of documents for attorney use at interviews; prepare and send 7th supplemental production to opposing counsel; load files into database and work with software IT regarding same.	5.00 200.00/hr	1,000.00
JY	Review discovery; meeting with Rusty Hardin, Leah Graham, Jenny Brevorka and Daniel Dutko regarding trial strategy.	7.00 200.00/hr	1,400.00
8/7/2023 RH	Respond to telephone call to Law 360 reporter.	0.25 500.00/hr	125.00
RH	Review material provided in discovery; review material in preparation for witness interviews on Wednesday and Thursday.	8.00 500.00/hr	4,000.00
RH	Meeting regarding fraud expert with Jim Yarbrough, Leah Graham, and Jenny Brevorka; correspondence with Leah Graham and Jenny Brevorka regarding subpoenas.	1.50 500.00/hr	750.00
LH	Research and draft responses to response to the Motion to Quash/Request for Bill of Particulars; meeting with Megan Moore regarding response to motions to dismiss; meeting with Daniel Dutko regarding response to motions to dismiss; email to legal team establishing drafting guidelines; emails re OAG subpoena; telephone conference with Harriett O'Neill regarding responses to Motion to Quash and Bill of Particulars.	11.00 500.00/hr	5,500.00

		HRS/RATE	AMOUNT
8/7/2023 JB	Draft and revise response to motion to dismiss; review chronology; confer with Leah Graham and Rusty Hardin regarding subpoenas; attend team meeting regarding trial strategy with Jim Yarbrough, Leah Graham, Daniel Dutko and Rusty Hardin; phone calls with Board of Managers Lawyers regarding subpoenas and witness matters.	10.50 500.00/hr	5,250.00
MCM	Confer with Lara Hollingsworth and Leah Graham regarding strategy for responding to certain motions to dismiss; review and analyze motion to dismiss Article VI; research and draft response to same; review and analyze motion to dismiss Articles VII and XV; review and analyze motion to dismiss Article VIII; review and analyze no-evidence motion for summary judgment on all articles of impeachment pertaining to whistleblower counts.	7.75 500.00/hr	3,875.00
LMG	Attention to issues relating to pretrial motions; continue to review and analyze client data and prepare attorney work product relating to same; prepare responses to pretrial motions and compile evidence in support of same.	14.50 500.00/hr	7,250.00
DD	Meeting with Lara Hollingsworth regarding response to motions to dismiss.	1.00 500.00/hr	500.00
ACL	Draft proof chart regarding witness testimony; phone call with Board of Managers lawyer regarding document production; draft timeline/chronology to update with new information from witness interviews.	4.00 500.00/hr	2,000.00
AD	Draft discovery timeline.	1.00	500.00
		500.00/hr	
AD	Media monitoring.	0.50 500.00/hr	NO CHARGE

			HRS/RATE	AMOUNT
8/7/2023	LBH	Deep dive into motions filed by Paxton concerning Articles II, III, IV and IX-XX; begin outlining responses and research needed.	9.75 300.00/hr	2,925.00
	RG	Attention to issues regarding pretrial motions; correspondence with co-counsel.	2.25 500.00/hr	1,125.00
	SJ	Continue preparation of documents for attorney use at interviews; prepare background notebook on witness for Rusty Hardin's review; conference with Jenny Brevorka regarding hotel war room logistics; call with hotel group services regarding same; review latest productions received responsive to Senate subpoenas; finalize binder of all pending motions for Rusty Hardin's review.	9.50 200.00/hr	1,900.00
	MV	Research cases, codes, and journals in Kenneth Paxton's most recent motion to compel.	6.75 100.00/hr	NO CHARGE
	MMC	Research cases, codes, and journals in motion to dismiss article 3.	3.75 100.00/hr	NO CHARGE
	TS	Continue compiling articles cited as evidence in Paxton's motions to dismiss; research Nate Paul.	5.00 50.00/hr	NO CHARGE
	TW	Summarized hearing in Mitte Litigation for Leah Graham and reviewed produced documents.	8.50 50.00/hr	NO CHARGE
8/8/2023	RH	Review materials in preparation for trial.	2.00 500.00/hr	1,000.00
	JR	Conferences with Lara Hollingsworth regarding strategy and procedural status; conduct legal research.	2.25 500.00/hr	1,125.00
	МСМ	Continue researching and drafting response to Paxton's motion to dismiss Article VI; confer with Leah Graham and Lara Hollingsworth regarding same.	11.00 500.00/hr	5,500.00
	JB	Review and edit subpoena attachments; confer with Leah Graham regarding subpoenas and chronology; draft and revise motion response;	11.00 500.00/hr	5,500.00

		HRS/RATE	AMOUNT
	confer with Board of Managers lawyer and Armie Lewis regarding materials for witness meeting; confer with Stella Jares regarding subpoenas; draft and circulate work flow for team; confer with Lara Hollingsworth regarding subpoena issues; review contract from Stacey Manela.		
8/8/2023 LMG	Continue to review and analyze documents produced in response to subpoenas; continue to prepare attorney work product related to same; meeting with Megan Moore and Lara Hollingsworth regarding response to Paxton's motions to dismiss and factual background relating to same; confer with Jenny Brevorka regarding subpoenas and chronology.	10.00 500.00/hr	5,000.00
LH	Emails with Harriett O'Neill regarding response to Bill of Particulars and Motion to Quash; research regarding same; draft and edit same; emails with House Managers regarding research on impeachment; research regarding privilege; emails with Ross Garber regarding responses to Bill of Particulars and Motion to Quash; emails regarding House subpoenas; collecting authorities for submission to Senate; emails with Board of Managers lawyer and Ross Garber regarding attorney-client privilege and research; emails with House lawyer regarding responses to motions to dismiss; review, research, draft, and edit response to exclude evidence regarding House process; confer with Jenny Brevorka regarding subpoena issues; confer with Megan Moore and Leah Graham regarding responses to motions to dismiss whistleblower articles.	11.50 500.00/hr	5,750.00
ACL	Review witness documents; review Witness 1 and Witness 2 transcripts for use in responding to Paxton's motions to dismiss; draft order of proof chart regarding witness testimony; confer with Board of Managers lawyer and Jenny Brevorka regarding materials for witness meeting.	3.75 500.00/hr	1,875.00

			HRS/RATE	AMOUNT
8/8/2023	AD	Reporting tasks; media monitoring.	0.75 500.00/hr	NO CHARGE
	LBH	Begin drafting response to motion to dismiss Article II; research issues related to same.	9.50 300.00/hr	2,850.00
	RG	Correspondence with co-counsel; evaluate pretrial motions.	3.00 500.00/hr	1,500.00
	SJ	Continue to upload and review subpoenaed document productions; team meetings to discuss draft response motions; revise documents for attorney use at interviews; conference with Jenny Brevorka regarding subpoenas.	7.00 200.00/hr	1,400.00
	JY	Review discovery.	7.25 200.00/hr	1,450.00
	MV	Continue to research cases, codes, and journals in Kenneth Paxton's most recent motions.	6.50 100.00/hr	NO CHARGE
	TS	Continue research relating to Nate Paul; research regarding Nate Paul's various scandals controversies lawsuits, public statements, foreclosures, and Office of Attorney General legal opinion letter.	7.00 50.00/hr	NO CHARGE
	TW	Summarize 91a hearing in Whistleblowers Litigation hearing.	4.50 50.00/hr	NO CHARGE
8/9/2023	RH	Travel to Austin for interviews with Witness 1 and Witness 2; interviews with Witness 1 and Witness 2; dinner meeting with team to further discuss witnesses; review of materials in preparation for witnesses.	9.25 500.00/hr	4,625.00
	ES	Communicate with Joe Roden regarding motion to exclude evidence; review motion.	0.75 500.00/hr	375.00
	JB	Participate in House Board of Managers meeting; review discovery and chronology for responses to motions; review court's exhibit production order; confer with team about exhibits and subpoenas;	10.00 500.00/hr	5,000.00

		HRS/RATE	AMOUNT
	confer with Lara Hollingsworth about draft responses.		
8/9/2023 JR	Conference with Emily Smith regarding impeachment strategy; conduct legal research; draft response to motion to challenge jurors.	7.75 500.00/hr	3,875.00
МСМ	Continue researching and drafting response to Paxton's motion to dismiss Article VI; finalize and circulate preliminary draft of same.	7.00 500.00/hr	3,500.00
LMG	Continue to prepare responses to pretrial motions to dismiss; continue to review documents and prepare attorney work product relating to same.	14.75 500.00/hr	7,375.00
LH	Circulate draft of response to motion to quash; review draft response to Lewis Brisbois motion to quash; emails with House Managers regarding impeachment research; attend status meeting with House Managers; emails regarding edits to motion to quash; review, research, draft, and edit response to exclude evidence regarding House process; emails and review and make edits to Bill of Particulars; circulate draft Bill of Particulars; review Senate exhibit order; review draft of factual narrative; review and edit response to motion to dismiss Article VI; research and draft response on forgiveness; review witness interview notes; review emails regarding notes on Paxton motions; review attorney-client privilege documents.	13.50 500.00/hr	6,750.00
ACL	Travel to Austin with Jim Yarbrough and Rusty Hardin regarding witness interviews; Witness 1 interview; Witness 2 interview; drafting memo regarding Witness 1 interview.	9.25 500.00/hr	4,625.00
AD	Media monitoring.	0.75 500.00/hr	NO CHARGE
	Review additional revisions and deletions on the response to motion to quash; emails to Board of Managers lawyer and Lara Hollingsworth concerning same.	0.50 500.00/hr	250.00

			HRS/RATE	AMOUNT
8/9/2023	LBH	Edit and revise response to motion to exclude evidence (House Process); research issues related to same; continue drafting response to motion to dismiss Article II.	12.50 300.00/hr	3,750.00
	RG	Correspondence with co-counsel; telephone conference with co-counsel; research regarding pretrial motions; evaluate pretrial motions; attention to strategy.	4.00 500.00/hr	2,000.00
	SJ	Send external hard drives of Texas State Facilities Commission video productions to opposing counsel; work with court reporters to get transcriptions of additional video recordings; update subpoena log; ingest and review additional subpoenaed productions.	9.50 200.00/hr	1,900.00
	JY	Travel to Austin for interviews of Witness 1 and Witness 2.	9.25 200.00/hr	1,850.00
	MV	Continue compiling cases and codes for the responses to Paxton's motions.	5.50 100.00/hr	NO CHARGE
	MMC	Continue compiling cases and codes for use in responses to Paxton's motions to dismiss; finish motion to quash article 6; continue to research cases codes, and journals for use relating to same.	5.50 100.00/hr	NO CHARGE
	TS	Continue researching Nate Paul's finances, public statements, lawsuits, and recent indictment for multiple felony counts of lying to financial institutions.	6.00 50.00/hr	NO CHARGE
8/10/2023	RH	Meeting with Witness 1 and his attorney to discuss further information in connection with case; participate in interviews of Witness 1 and Witness 2; telephone conference with House Manager regarding filings to be developed; return to Houston.	11.25 500.00/hr	5,625.00

		HRS/RATE	AMOUNT
8/10/2023 ES	Prepare response to AG's motion to exclude evidence; communicate with Joe Roden regarding same.	2.50 500.00/hr	1,250.00
JB	Review materials for exhibits; draft and revise response materials; review e-mail correspondence pertaining to pleadings; participate in conference call about motions and evidence; participate in discussions about recordings of interview transcripts.	10.75 500.00/hr	5,375.00
JR	Conduct legal research; draft response to motion to challenge jurors; draft response to motion to preclude House from calling Paxton; meeting with Lara Hollingsworth regarding same.	10.25 500.00/hr	5,125.00
MCM	Continue researching and drafting responses to Paxton's motion to dismiss Article VI, motion to dismiss Article VIII, and motion to dismiss Articles VII and XV.	5.50 500.00/hr	2,750.00
LMG	Continue to prepare responses to pretrial motions to dismiss; continue to review and analyze documents received in response to subpoenas and prepare attorney work product relating to same.	12.50 500.00/hr	6,250.00
DD	Review and analysis of Paxton's motion to dismiss Article I and preparation of notes regarding same to prepare response; review and analysis of witness interviews, documents and all evidence supporting Article I to prepare response to Paxton's motion to dismiss.	9.00 500.00/hr	4,500.00
LH	Review Paxton discovery deficiency letter; review witness interview notes; review emails regarding responses to subpoenas; review, research, draft, and edit response to motion to exclude evidence of House process; review research and email with House Managers regarding impeachable offenses; circulate draft response to motion to exclude evidence of House process; emails regarding attorney-client privilege; meeting with legal team, regarding status of responses; review	11.50 500.00/hr	5,750.00

		HRS/RATE	AMOUNT
	and incorporate edits to circulated responses; emails from investigators regarding responses to motions to dismiss; email from House Managers regarding edits, comments, and research on responses; meeting with Joe Roden regarding response to juror challenge and Paxton testifying.		
8/10/2023 ACL	Travel to Houston with Jim Yarbrough and Rusty Hardin for witness interviews; Witness 1 interview with Jim Yarbrough, Rusty Hardin, Dick DeGuerin, and Board of Managers lawyer; Witness 2 interview with Jim Yarbrough, Rusty Hardin, Dick DeGuerin, Board of Managers lawyer; meeting with Witness 1, Board of Managers lawyer; Dick DeGuerin, and Rusty Hardin; draft memo regarding Witness 3; draft memo regarding Witness 2 interview; draft memo regarding Witness 4 interview.	11.25 500.00/hr	5,625.00
AD	Media monitoring.	1.25 500.00/hr	NO CHARGE
LBH	Finalize response to motion to exclude evidence (House Process); continue drafting response to motion to dismiss Article II; research issues related to same; participate in conference with legal team; begin to outline response to motions to dismiss Articles III and IV and conduct research in support of same.	14.75 300.00/hr	4,425.00
RG	Attention to pretrial issues; telephone conference with co-counsel.	4.00 500.00/hr	2,000.00
SJ	Team conference regarding letter from Paxton's counsel outlining alleged discovery deficiencies; review production log; prepare supplemental production; create and finalize documents for attorney use at witness interview; coordinate trial logistics with Austin hotel; conferences to discuss finalization of responses to Paxton's pre-trial motions.	9.75 200.00/hr	1,950.00
JY	Austin interviews of Witness 1 and Witness 2; return to Houston.	9.00 200.00/hr	1,800.00

		HRS/RATE	AMOUNT
8/10/2023 MV	Compile final book of authorities.	6.25 100.00/hr	NO CHARGE
ММС	Compile cases to respond to motions to dismiss.	6.25 100.00/hr	NO CHARGE
TS	Finish analysis and summary of Nate Paul's research for attorney's use and review.	5.00 50.00/hr	NO CHARGE
8/11/2023 RH	Telephone conference regarding background of case and to set the stage for trial; review materials in preparation for trial; meeting with Leah Graham, Lara Hollingsworth, Jenny Brevorka, Armie Lewis, Jim Yarbrough, and Stella Jares to discuss order of filing and responses to opposing motions; telephone conference with House Manager to solicit views; telephone conference with Harriett O'Neill to discuss strategy regarding filing of responses to pretrial motions; information background meeting with opposing counsel; review materials in preparation for trial and filing of motions.	7.75 500.00/hr	3,875.00
ES	Prepare response to Paxton's motion to exclude evidence.	4.00 500.00/hr	2,000.00
JB	Revise and edit responses to Paxton's motions; review and compile supporting exhibits; provide direction on Book of Authorities; draft response to Motion for Brady Evidence; confer with Lara Hollingsworth about edits to motions.	12.25 500.00/hr	6,125.00
JR	Conduct legal research; draft responses to motion to challenge jurors; draft response to motion to preclude House from calling Paxton.	6.25 500.00/hr	3,125.00
MCM	Continue researching and drafting responses to Paxton's motion to dismiss Article VI, motion to dismiss Article VIII, and motion to dismiss Articles VII and XV.	11.00 500.00/hr	5,500.00
LMG	Continue to prepare responses to pretrial motions to dismiss; continue to review and analyze documents received in response to subpoena and prepare attorney work product relating to same.	10.25 500.00/hr	5,125.00

AMOUNT

HRS/RATE

8/11/2023 JB	Meeting regarding motion response strategy.	1.00 500.00/hr	NO CHARGE
LMG	Meeting to discuss strategy for responses to Paxton's motions to dismiss.	1.00 500.00/hr	NO CHARGE
DD	Prepare response to Paxton's motion to dismiss regarding Article I.	7.00 500.00/hr	3,500.00
LH	Research regarding motions to dismiss in criminal proceedings; review, research, and edit response to motion to dismiss Article II; telephone conference with Lisa Hobbs regarding same; review, edit, research, and draft response to motion and notice regarding Brady materials; review witness interview notes; review and incorporate edits from House counsel; review House subpoenas; meeting with Rusty Hardin, Jenny Brevorka, Leah Graham, and Armie Lewis regarding factual narrative and filing of responses; emails regarding requirements for filing responses with Senate; review Texas For Lawsuit Reform's motion to quash; emails from House lawyers regarding responses to motions to dismiss; telephone conference with Harriett O'Neill, Board of Managers lawyer, and Ross Garber regarding attorney-client privilege; review, edit, research, draft response to motion to dismiss Articles III and IV; telephone conference with House Manager regarding impeachment law; edit, draft, research forgiveness; review Paxton motion to compel discovery.	9.00 500.00/hr	4,500.00
AD	Work on discovery timeline.	4.25 500.00/hr	2,125.00
ACL	Draft memo regarding Witness 1 interview; draft memo regarding Witness 2 interview; highlight interview transcripts for portions to use in response briefs; meeting with Leah Graham, Lara Hollingsworth, Jenny Brevorka, Jim Yarbrough, and Rusty Hardin regarding motion strategy.	10.25 500.00/hr	5,125.00

		HRS/RATE	AMOUNT
8/11/2023 AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
LB	Finalize and circulate response to motion to dismiss Article II; confer with Board of Managers lawyer to confirm accuracy; draft response to motions to dismiss Articles III and IV; confer with Board of Managers lawyer and Leah Graham to confirm accuracy.	15.50 300.00/hr	4,650.00
RG	Attention to pretrial issues; telephone conference with co-counsel; correspondence with co-counsel.	5.25 500.00/hr	2,625.00
SJ	Team meeting to discuss strategy and logistics for filing of responses; prepare index to witness documents; work with Leah Graham on compiling exhibits to responses.	9.00 200.00/hr	1,800.00
JY	Review discovery.	4.50 200.00/hr	900.00
JY	Meeting with Leah Graham, Lara Hollingsworth, Jenny Brevorka, Armie Lewis, and Rusty Hardin regarding motion strategy.	1.00 200.00/hr	NO CHARGE
MV	Continue research and gather authorities in response to Paxton's motions to dismiss.	6.50 100.00/hr	NO CHARGE
MM	C Continue research regarding responses to Paxton's motions to dismiss.	6.50 100.00/hr	NO CHARGE
CD	Complete re-draft of response to motion to quash; two telephone calls with counsel and Ross Garber; send edited copy to cooperating lawyers.	4.50 500.00/hr	2,250.00
8/12/2023 RH	Review materials in preparation for trial and witness interviews; draft, edit and review responses to various motions to be filed on Tuesday.	12.00 500.00/hr	6,000.00
JB	Revise and edit responses to motions to dismiss; confer with team about draft responses and revisions.	13.50 500.00/hr	6,750.00

		HRS/RATE	AMOUNT
8/12/2023 JR	Conduct legal research; draft response to Paxton's motion to preclude House from calling Paxton to testify at trial; conference with Lara Hollingsworth regarding same.	8.50 500.00/hr	4,250.00
МСМ	Finalize and circulate responses to Paxton's motion to dismiss Article VI, motion to dismiss Article VIII, and motion to dismiss Article VIII and XV.	11.25 500.00/hr	5,625.00
ES	Review and revise response; communicate with Joe Roden regarding response; communicate with Lisa Hobbs regarding response.	0.50 500.00/hr	250.00
LMG	Continue to prepare responses to pretrial motions to dismiss.	14.00 500.00/hr	7,000.00
LMG	Meeting with Jenny Brevorka, Rusty Hardin and Lara Hollingsworth regarding narrative.	1.00 500.00/hr	NO CHARGE
LH	Review, research, edit, and draft response to exclude campaign donations; review and edit response to motion to dismiss Article VI; edit, draft, review, and research response to motion to dismiss Articles III and IV; review and edit response to motion to challenge jury; review, edit, draft response to motion to dismiss Article VIII; meeting with Joe Roden regarding response to motion to preclude Paxton from testifying; meeting with Jenny Brevorka, Leah Graham, and Rusty Hardin regarding narrative; edit, research, draft response to forgiveness; review and edit response to motion to dismiss Articles VII and XV.	11.25 500.00/hr	5,625.00
ACL	Draft order of proof chart; edit brief for transcript references; highlight interview transcripts for portions to use in response briefs; review Nate Paul interview videos; editing exhibits to pretrial responses.	7.75 500.00/hr	3,875.00
AD	Draft motion to compel response.	3.25 500.00/hr	1,625.00
CD	Receive edited version from Judge O'Neill; review edits; send comments.	0.50 500.00/hr	250.00

			HRS/RATE	AMOUNT
8/12/2023	3 LBH	Finalize and circulate response to motions to dismiss Articles III and IV; begin drafting response to motions to dismiss IX and XX; research issues related to same; confer with Joe Roden regarding factual narrative on bribery and calling Paxton to testify; edit and revise draft response to Paxton's motion to exclude Nate Paul donations; edit and revise response to motions to dismiss Articles III and IV.	15.00 300.00/hr	4,500.00
	RG	Attention to pretrial issues; correspondence with co-counsel.	0.75 500.00/hr	375.00
	SJ	Prepare supplemental production of witness's handwritten notes; review recently issued subpoenas and update subpoena log; work on identifying and compiling exhibits to responses to Paxton's pre-trial motions.	5.00 200.00/hr	1,000.00
	MV	Continue to compile cases and codes for use in the responses to Paxton's motions to dismiss.	3.50 100.00/hr	NO CHARGE
	MMC	Continue compiling cases and codes for use in responses to Paxton's motions to dismiss.	4.75 100.00/hr	NO CHARGE
8/13/2023	RH	Review materials in preparation for trial and witness interviews; draft, edit and review responses to various motions to be filed on Tuesday with particular emphasis to response to motion for forgiveness and motion for summary judgment; meeting with team regarding the same; review materials in preparation for witness interviews.	13.00 500.00/hr	6,500.00
	JR	Conduct legal research; prepare response to motion to challenge jurors for cause.	7.25 500.00/hr	3,625.00
	JB	Revise and edit factual responses to motion to dismiss and motion for summary judgment; meeting regarding narrative.	21.00 500.00/hr	10,500.00
	LMG	Continue to prepare responses to pretrial motions to dismiss; attend meeting regarding narrative.	18.00 500.00/hr	9,000.00

		HRS/RATE	AMOUNT
8/13/2023 LH	Research regarding criminal procedures, impeachment procedures, and law, Forgiveness Doctrine, House process, <i>Brady</i> ; edit, draft, and review responses to motions to dismiss Articles II, VI, VII, VIII, IX, X, XV, motions to exclude evidence, <i>Brady</i> motion, juror challenge; research prior impeachment proceedings; meeting with Rusty Hardin, Jenny Brevorka, and Leah Graham regarding narrative.	16.00 500.00/hr	8,000.00
AD	Draft motion to compel response.	4.50 500.00/hr	2,250.00
ACL	Highlight interview transcripts for portions to use in response briefs; review materials for witness interview.	3.50 500.00/hr	1,750.00
AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
LBH	Edit, revise, and circulate response to motions to dismiss Articles IX and XX; confer with Board of Managers lawyer regarding same; incorporate comments to draft; edit and revise response to motion to dismiss Article II; research issues related to Article II; edit and revise Forgiveness Doctrine response; incorporate comments on Articles IX and XX response; begin drafting response to motion to dismiss Articles XVI-XX; conduct research regarding same; confer with Board of Managers lawyer regarding the Rule of Unanimity; confer with Ross Garber regarding issues raised in Articles XVI-XX motion; edit and revise Articles XVI-XX response; confer with Mattie Vazquez and Molly McNamara regarding prior impeachment research; edit and revise response to Paxton's Motion for Notice of Brady Materials; confer with Lara Hollingsworth regarding Article II response; edit and revise same.	15.75 300.00/hr	4,725.00
RG	Attention to pretrial issues; correspondence with co-counsel.	1.50 500.00/hr	750.00
CD	Additional edits based upon Board of Managers lawyer's comments; send to Judge O'Neill and team for consideration.	0.75 500.00/hr	375.00

		HRS/RATE	AMOUNT
8/13/2023 SJ	Work on exhibits to HBOM responsive motions; preparation of documents for attorney use at interview.	11.00 200.00/hr	2,200.00
ММС	Began researching impeachment proceedings of Carillo for potential use in responses to pretrial motions to dismiss; continue putting cases and codes in binders.	5.50 100.00/hr	NO CHARGE
MV	Began researching the impeachment proceedings of Carillo for potential use in responses to Paxton's pretrial motions to dismiss; review motions written by Lara Hollingsworth to ensure accuracy; review James Ferguson impeachment proceedings for potential use in same.	5.50 100.00/hr	NO CHARGE
8/14/2023 RH	Travel to Dallas; participate in interviews of Witness 1 and Witness 2 in Frisco; return to Houston; review of materials in preparation for trial.	19.00 500.00/hr	9,500.00
LMG	Continue to prepare responses to pretrial motions to dismiss; continue to review documents and prepare attorney work product relating to same.	17.25 500.00/hr	8,625.00
MCM	Review, revise, and finalize response to motion to dismiss Impeachment Article I; confer with Lara Hollingsworth regarding same; incorporate revisions to finalize responses to motions to dismiss Impeachment Articles, VI, VII & XV, and VIII.	9.00 500.00/hr	4,500.00
JB	Draft and revise responses to Paxton's motions to dismiss; review and edit exhibits to same.	12.00 500.00/hr	6,000.00
ES	Communicate with Lara Hollingsworth regarding response.	0.25 500.00/hr	NO CHARGE
LH	Review, edit, and draft responses to motions to dismiss Articles I, II, III, IV, VIII, VII, XV, XVI-XX, forgiveness, motion to quash, Bill of Particulars, Paxton testifying; edit narrative, begin finalizing responses; confer with team regarding same.	15.50 500.00/hr	7,750.00

			HRS/RATE	AMOUNT
8/14/2023	JR	Conduct legal research and prepare responses to motion to preclude Paxton from testifying and motion challenging jurors for cause.	9.25 500.00/hr	4,625.00
	AD	Draft motion to compel response; review investigative subpoena production.	6.75 500.00/hr	3,375.00
	ACL	Travel to Dallas with Rusty Hardin, Jim Yarbrough, and Dick DeGuerin regarding Witness 1 and Witness 2 interviews; Witness 1 and Witness 2 interviews with Rusty Hardin, Jim Yarbrough, and Dick DeGuerin; travel from Dallas to Houston from interviews.	19.00 500.00/hr	9,500.00
	AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
	SMZ	Review and revise draft response to motion for summary judgment; review and revise draft responses to motions to dismiss; review radio interview of Ken Paxton and provide summary to Jenny Brevorka.	8.75 200.00/hr	1,750.00
	LBH	Edit, revise, and circulate responses to motions to dismiss Articles II, III, IV, IX, XX, and XVI-XX; edit and revise responses based on feedback from team; assist in finalizing citations for other responses; begin drafting response to motion to set pre-trial deadlines.	15.25 300.00/hr	4,575.00
	RG	Attention to pretrial issues; correspondence with co-counsel; evaluate legal issues.	6.00 500.00/hr	3,000.00
	SJ	Continue to prepare exhibits to responses to Paxton's pre-trial motions.	17.50 200.00/hr	3,500.00
	JY	Travel to Dallas with Rusty Hardin and Armie Lewis for interviews of Witness 1 and Witness 2; return to Houston.	19.00 200.00/hr	3,800.00
	MMC	Continue researching and pulling cases for motions to dismiss responses.	6.75 100.00/hr	NO CHARGE

		HRS/RATE	AMOUNT
8/15/2023 RH	Work on drafting, editing, and production of responses to 21 motions.	17.00 500.00/hr	8,500.00
LMG	Continue to prepare responses to pretrial motions to dismiss; continue to review documents and prepare attorney work product relating to same; attention to issues relating to witness interviews.	18.50 500.00/hr	9,250.00
MCM	Continue assisting with finalizing all responses to motions to dismiss, including cite checking certain briefs, incorporating edits to various motions, and finalizing appendices of authorities.	7.75 500.00/hr	3,875.00
JB	Draft and revise responses to motions to dismiss.	19.00 500.00/hr	9,500.00
ES	Communicate with Lara Hollingsworth regarding edits to response to motion to exclude evidence; telephone call with Board of Managers lawyer regarding edits to response; review and revive response.	1.50 500.00/hr	750.00
LH	Edit draft, and finalize all responses; draft narrative; prepare book of exhibits for filing; prepare book of authorities for filing; emails regarding same.	14.75 500.00/hr	7,375.00
AD	Legal research for Lara Hollingsworth on motion to compel; edits to motion to compel.	3.00 500.00/hr	1,500.00
ACL	Draft memo regarding witness interview; draft and edit response for Forgiveness Doctrine brief with Rusty Hardin and Jenny Brevorka; edit and cite check exhibit references in response brief; telephone calls regarding scheduling of witness interviews.	13.00 500.00/hr	6,500.00
AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
SMZ	Work on proofreading and revisions to draft responses; test Sharepoint access outside of the office; prepare exhibit cover sheets and add to all exhibits.	10.25 200.00/hr	2,050.00

			HRS/RATE	AMOUNT
8/15/2023	LBH	Finalize motions to dismiss Articles II, III, IV, IX, XX, and XVI-XX; circulate response to motion to set pre-trial deadlines.	3.50 300.00/hr	1,050.00
	RG	Attention to pretrial issues; correspondence with co-counsel; attention to strategy.	3.25 500.00/hr	1,625.00
	SJ	Complete compendium of exhibits to response motions; prepare and serve 13th supplemental production to opposing counsel.	13.00 200.00/hr	2,600.00
	JY	Review discovery; phone calls with Board of Managers staff; work on subpoena review.	4.75 200.00/hr	950.00
8/16/2023	MV	Continue pulling authorities in cited responses and compile the sources into 6 master book of authorities.	6.25 100.00/hr	NO CHARGE
	MMC	Finish pulling cases for motions to dismiss responses.	6.25 100.00/hr	NO CHARGE
	TW	Assist in preparation of responses to Paxton's motions to dismiss including case and evidence citations.	8.50 50.00/hr	NO CHARGE
	RH	Participate in conference call with House Managers; multiple telephone calls with Patsy Spaw regarding technical and security issues relating to filing of responses to Paxton's motions to dismiss.	3.00 500.00/hr	1,500.00
	LMG	Begin preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; attention to issues relating to witness interviews.	9.50 500.00/hr	4,750.00
	MCM	Review all responses submitted by House Board of Managers and other relevant pleadings in anticipation of further trial preparation.	4.00 500.00/hr	2,000.00

		HRS/RATE	AMOUNT
8/16/2023 JB	Work on various issues with filings; confer with various team members regarding trial logistics; review and edit response to motion to compel.	7.00 500.00/hr	3,500.00
LH	Meeting with House Managers; telephone conference with Rusty Hardin and Patsy Spaw regarding filing; telephone conference with Jim Yarbrough regarding Sharefile; review Paxton's reply to response; draft and file letter response to Paxton's improper replies; review Paxton response to motion to clarify.	6.25 500.00/hr	3,125.00
AD	Media monitoring; correspondence with Kendall Speer regarding media monitoring.	1.25 500.00/hr	NO CHARGE
KVS	Conference with Rusty Hardin and search for media attention in response to filings.	1.00 500.00/hr	NO CHARGE
ACI	Draft memo regarding witness interview; phone call with Rusty Hardin, Dick DeGuerin, Board of Managers lawyer regarding witness interview; draft timeline/chronology; draft topics for witness interview; review materials for witness interview.	9.75 500.00/hr	4,875.00
RG	Attention to pretrial motions; correspondence with co-counsel.	2.75 500.00/hr	1,375.00
SJ	Continue review of subpoenaed documents in database.	4.00 200.00/hr	800.00
JY	Telephone conference with House Managers, RHA and House Investigators; left messages with the Austin Police Department regarding Paxton's report of alleged terroristic threat regarding Nate Paul; work on motion production complications; review discovery.	7.00 200.00/hr	1,400.00
8/17/2023 RH	Interview of witness; meeting with House Managers regarding same.	7.25 500.00/hr	3,625.00

		HRS/RATE	AMOUNT
8/17/2023 LMG	Begin preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; attention to issues relating to witness interviews.	12.75 500.00/hr	6,375.00
МСМ	Continue to review all responses submitted by House Board of Managers and other relevant pleadings in anticipation of further trial preparation; review public media regarding trial.	5.00 500.00/hr	2,500.00
JB	Draft response to motion to compel discovery; confer with various members of trial team about logistics for trial.	14.00 500.00/hr	7,000.00
AD	Review pending motions.	0.75 500.00/hr	NO CHARGE
KVS	Confer with Aisha Dennis; review media response and compile same; additional research and attention to sending summary to impeachment team; attention to email bounce backs and resending media email.	1.50 500.00/hr	NO CHARGE
ACL	Draft timeline/chronology for attorney use in witness interview; draft discussion topics for witness interview; reviewing materials for witness interview; draft and edit notes regarding witness interview.	10.25 500.00/hr	5,125.00
RG	Attention to pretrial issues; correspondence with co-counsel.	0.50 500.00/hr	250.00
SJ	Continue review of subpoenaed documents in database; preparation of documents for attorneys' use in interviews.	9.50 200.00/hr	1,900.00
JY	Meeting with team and House Managers regarding witness interview; meetings before and after interview.	7.25 200.00/hr	1,450.00

		HRS/RATE	AMOUNT
8/17/2023 TW	Prepare impeachment exhibits for Stella Jares; create exhibit chart and motion exhibits for attorney's review and analysis.	6.75 50.00/hr	NO CHARGE
8/18/2023 LMG	Continue preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; meeting with Megan Moore regarding same.	9.25 500.00/hr	4,625.00
МСМ	Review and organize trial exhibits for Articles VI, VII, VIII, and XV regarding whistleblower claims; confer with Leah Graham regarding same.	10.50 500.00/hr	5,250.00
JB	Review and edit subpoenas; e-mail correspondence with investigators and Leah Graham about multiple subpoenas; phone conference with Armie Lewis about motion to compel, revisions to motion; confer with Armie Lewis about changes to Uber chart and amending of chart with filings; e-mail correspondence about court reporting issues, exhibits, list of witnesses, and terms; revise and edit correspondence to court about amended exhibits and motion, and filing; confer with Leah Graham about communication to opposing counsel regarding meet and confer.	4.50 500.00/hr	2,250.00
LH	Review and edit response to Paxton's motion to compel discovery; review and edit amended response to no-evidence motion for summary judgment; review Paxton's motion for sanctions.	1.50 500.00/hr	750.00
AD	Edit motions; review impeachment filings.	0.75 500.00/hr	NO CHARGE
ACL	Draft and edit notes regarding witness interview; discussion with Leah Graham and Jim Yarbrough regarding Uber rides log; phone call with Jennifer Brevorka about tasks and response to motion to compel; edit and draft response to motion to compel; draft email and edit exhibit and response for amended exhibit and amended response.	10.50 500.00/hr	5,250.00

AMOUNT

HRS/RATE

8/18/2023	KVS	Review media and compile summary of stories and tweets.	0.75 500.00/hr	NO CHARGE
	RG	Attention to pretrial issues; correspondence with co-counsel.	0.25 500.00/hr	125.00
	SJ	Travel to Austin with trial graphics consultant Stacey Manela to meet with Patsy Spaw and House Managers team to discuss trial logistics; meeting with DoubleTree hotel staff to discuss war room logistics.	8.50 200.00/hr	1,700.00
	JY	Work on discovery; discussion of Uber rides.	6.25 200.00/hr	1,250.00
	TW	Prepared impeachment exhibits for Stella Jares and created exhibit chart for Leah Graham.	3.75 50.00/hr	NO CHARGE
8/19/2023	LMG	Begin preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review documents and prepare attorney work product relating to same; attention to issues relating to witness interviews.	14.50 500.00/hr	7,250.00
	MCM	Continue reviewing and organizing trial exhibits for Articles VI, VII, VIII, and XV regarding whistleblower claims.	7.00 500.00/hr	3,500.00
	LH	Research, draft, and prepare response to motion for sanctions; review subpoenas and document production regarding same.	2.00 500.00/hr	1,000.00
	JB	Revise and edit witness list; revise and edit chronology; confer with Board of Managers lawyer; review e-mails about trial logistics; correspondence with Leah Graham and Armie Lewis about exhibits.	3.50 500.00/hr	1,750.00
	ACL	Review and edit witness list; draft timeline.	8.75 500.00/hr	4,375.00

		HRS/RATE	AMOUNT
8/19/2023 AD	Review correspondence from team.	0.50 500.00/hr	NO CHARGE
RO	Attention to pretrial issues; correspondence with co-counsel.	0.25 500.00/hr	125.00
SJ	Prepare memorandum for trial team summarizing meetings with Patsy Spaw and House Managers regarding trial logistics; organize and upload various files for House Managers to review online.	4.00 200.00/hr	800.00
8/20/2023 RH	Meeting with team to discuss trial; strategy and exhibits; telephone conference with client and trial team to discuss update, strategy of scheduling witness and exhibits; review of exhibits.	7.00 500.00/hr	3,500.00
LM	G Continue preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review and analyze documents produced in response to subpoenas; prepare attorney work product relating to same.	10.25 500.00/hr	5,125.00
JB	Revise and edit witness list; participate in group conference call; telephone discussions with Rusty Hardin about witness list and witnesses; draft lengthy e-mail to Aisha Dennis about securities chronology; revise and edit chronology; review securities materials; phone call with Armie Lewis regarding drafting timeline.	5.00 500.00/hr	2,500.00
DD	Attend meeting regarding remaining discovery issues, exhibits, witnesses and trial logistics; review and analyze documents related to Articles I and II to confirm that all exhibits related to this article are on the exhibit list and identify which documents and witnesses may be sponsored.	8.50 500.00/hr	4,250.00
LH	Meeting with trial team regarding exhibits, witnesses, preparation for presentation of responses to motions to dismiss; draft response to motion for sanctions; review document productions and subpoenas and compare documents in response to motion for sanctions.	2.75 500.00/hr	1,375.00

AMOUNT

HRS/RATE

8/20/2023	LMG	Meetings regarding trial strategy, exhibits and witnesses.	2.00 500.00/hr	NO CHARGE
	ACL	Drafting timeline; phone call with trial team regarding trial strategy; phone call with Jennifer Brevorka regarding drafting timeline.	8.00 500.00/hr	4,000.00
	AD	Correspondence from Jenny Brevorka regarding securities chronology.	0.50 500.00/hr	250.00
	SJ	Work with Lara Hollingsworth on response to Paxton's motion for sanctions regarding alleged discovery deficiencies; participate in trial team Zoom meeting.	9.00 200.00/hr	1,800.00
8/21/2023	RH	Telephone conference with team to discuss assignments of motion response at trial; review of materials and rules in preparation for trial.	4.50 500.00/hr	2,250.00
	RH	Confer with Jenny Brevorka regarding press questions and exhibits; meeting with Stella Jares regarding trial logistics.	0.50 500.00/hr	250.00
	LMG	Continue preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; attention to issues relating to witness interviews; confer with Jenny Brevorka and Julie Ayers regarding exhibits.	15.00 500.00/hr	7,500.00
	MCM	Review trial exhibits and prepare final trial exhibit list, including exhibits relating to open records, Mitte litigation, and foreclosure.	12.50 500.00/hr	6,250.00
	JB	Prepare for trial; prepare and edit witness list; confer multiple times with Board of Managers lawyer about witness subpoenas and trial document subpoenas; review Uber records and determine credit card information to file; confer with Leah Graham about exhibits; review e-mails about motion arguments;	10.00 500.00/hr	5,000.00

			HRS/RATE	AMOUNT
		review issues from investigators about witnesses and action items; confer with Rusty Hardin about press questions and exhibits; meeting with Lara Hollingsworth, Ross Garber, Lisa Hobbs, and Harriett O'Neill regarding legal issues and draft of motions and responses.		
8/21/2023	3 LH	Draft response to motion for sanctions; review document production and subpoena information; meeting with legal team regarding preparation of materials regarding responses for trial team.	4.00 500.00/hr	2,000.00
	ACL	Draft timeline; phone call regarding documents; draft order of proof chart.	8.25 500.00/hr	4,125.00
	AD	Review exhibits.	6.00 500.00/hr	3,000.00
	AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
	LBH	Prepare for and attend trial preparation meeting; begin outlining legal issues for lead trial lawyers.	3.75 300.00/hr	1,125.00
	RG	Attention to pretrial issues; correspondence with co-counsel.	1.00 500.00/hr	500.00
	JA	Communications with Leah Graham regarding availability to work on redactions and exhibit list.	0.25 200.00/hr	NO CHARGE
	SJ	Complete chart to accompany response to Paxton's motion for sanctions regarding alleged discovery deficiencies; meet with Rusty Hardin to discuss trial logistics; upload latest productions from OAG and witness to database.	9.00 200.00/hr	1,800.00
	JY	Travel to Austin for interviews; conduct interviews.	8.00 200.00/hr	1,600.00

		HRS/RATE	AMOUNT
8/21/2023 JY	Review discovery pertaining to Austin Police Department investigation of Paxton claiming a threat; prepare memo of the investigation and send to team; trial preparation.	12.50 200.00/hr	2,500.00
TW	Correct trial exhibits for Armie Lewis and Jennifer Brevorka; create exhibit chart for Leah Graham.	7.75 50.00/hr	NO CHARGE
8/22/2023 RH	Review materials in preparation for trial; telephone conferences with client; telephone conferences with House Board of Managers; multiple telephone conferences with Jenny Brevorka; multiple telephone conferences with Leah Graham and Stella Jares; review materials in preparation for Thursday meeting and presentation with House Board of Managers.	10.00 500.00/hr	5,000.00
LMG	Multiple telephone conferences with Megan Moore and Stella Jares; begin preparing exhibits in anticipation of upcoming exhibit list deadline; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; meetings with Rusty Hardin and Stella Jares regarding trial logistics, prepare presentation for House Board of Managers.	18.25 500.00/hr	9,125.00
МСМ	Continue reviewing trial exhibits and revising trial exhibit list; frequent communications with Leah Graham and Stella Jares regarding same; assist in finalizing trial exhibit list and attention to service of same, including potential service issues.	13.75 500.00/hr	6,875.00
JB	Revise and edit witness list; revise and edit subpoenas; multiple phone calls with Rusty Hardin and Lara Hollingsworth about trial matters; phone call about subpoena to World Class Holdings and witness; telephone discussion with Jim Yarbrough and Board of Managers staff about interview; review and edit exhibit list; phone call with Patsy Spaw about exhibit filings; confer with staff about obtaining transcriptions of witness audio recordings;	11.75 500.00/hr	5,875.00

		HRS/RATE	AMOUNT
	edit and revise chronology; confer with Armie Lewis about chronology and revisions; review House Appropriations committee video for appearance by Messrs. Paxton and Hilton.		
8/22/2023 DD	Review and analysis of documents related to Article III to confirm that all exhibits related to this article are on the exhibit list and identify which documents and witnesses may be sponsored through; review and analysis of documents related to Article IV to confirm that all exhibits related to this article are on the Exhibit List and identify which documents and witnesses may be sponsored through; prepare presentation for House Board of Managers.	8.00 500.00/hr	4,000.00
LH	Telephone conference with Rusty Hardin and Jenny Brevorka regarding witnesses and attorney examination.	0.75 500.00/hr	375.00
AD	Media monitoring.	0.50 500.00/hr	NO CHARGE
ACL	Draft timeline; phone calls regarding document production.	9.50 500.00/hr	4,750.00
AD	Review exhibits.	5.75 500.00/hr	2,875.00
JA	Assist with preparing exhibits and exhibit list; communications with Leah Graham and Stella Jares regarding same.	3.75 200.00/hr	750.00
SJ	Work on exhibits to HBOM responsive motions; prepare 3rd supplemental production and serve same on opposing counsel; update production log.	15.00 200.00/hr	3,000.00
JY	Interview in Austin; telephone conference with Austin Police Department and Jenny Brevorka; return to Houston.	8.00 200.00/hr	1,600.00

		HRS/RATE	AMOUNT
8/22/2023 TW	Correct chronology for Armie Lewis and Jennifer Brevorka; redact exhibits for Leah Graham.	8.75 50.00/hr	NO CHARGE
8/23/2023 RH	Telephone conferences with Jenny Brevorka and Board of Managers lawyer and other separate members of the team regarding witnesses, exhibits, and strategy of witnesses; telephone conference with investigators, RHA team, and Dick DeGuerin to further discuss witnesses; telephone conference with House Manager to discuss same; review documents in preparation for witness interview; review of documents in preparation for trial; meeting with Armie Lewis and Jim Yarbrough regarding logistics of interview in Austin on 8/23.	11.50 500.00/hr	5,750.00
LMG	Prepare for trial; continue to review documents and prepare attorney work product relating to same; attention to document production and issues relating to same; attention to issues relating to witness interviews.	8.50 500.00/hr	4,250.00
MCM	Attend meeting regarding trial logistics; confer with Stella Jares regarding same; review order of proof chart.	1.25 500.00/hr	NO CHARGE
JB	Meeting on trial logistics with RH&A trial team.	1.25 500.00/hr	NO CHARGE
JB	Attend meeting with House Board of Managers; phone conferences with Rusty Hardin and Board of Managers lawyer regarding witnesses, exhibits, and trial strategies; e-mail correspondence with client about exhibits and exhibit list; phone conference with Jim Yarbrough and witness; meeting with investigators and trial team about witnesses and witness order; direct staff about trial preparations; review Attorney General's exhibits; confer with Armie Lewis and Megan Moore about proof chart.	8.00 500.00/hr	4,000.00

			HRS/RATE	AMOUNT
8/23/2023	DD	Review and analyze notes and documents regarding interviews with Witness 1 and Witness 2; preparation of outline topics to be covered during direct examination of Witness 1.	8.00 500.00/hr	4,000.00
	LH	Meeting with the House Managers; draft and research response to motion for sanctions; create chart comparing the production of documents.	4.25 500.00/hr	2,125.00
	ACL	Draft timeline; meeting regarding logistics with Aisha Dennis, Jenny Brevorka, Stella Jares, Daniel Dutko, Leah Graham, and Megan Moore.	7.75 500.00/hr	3,875.00
	AD	Begin defense exhibits review.	2.25 500.00/hr	1,125.00
	AD	Team meeting.	1.25 500.00/hr	NO CHARGE
	SMZ	Conference with Armie Lewis regarding work on chart of Uber rides for locations; work to find accurate latitude and longitude locations and revise chart with same.	1.50 200.00/hr	300.00
	SJ	Team meeting to discuss trial preparations; upload recent productions; complete preparation of documents for attorneys' use at trial; prepare notebook of witness interview summaries; work on logistics of hard copy sets of trial exhibits and legal research to Austin hotel.	8.00 200.00/hr	1,600.00
	JY	Work on discovery; prepare for upcoming interviews.	7.00 200.00/hr	1,400.00
	TW	Work on chronology with Armie Lewis and attend logistics meeting; assemble notebooks for Stella Jares.	6.75 50.00/hr	NO CHARGE
8/24/2023	RH	Travel to and from Austin with Armie Lewis and Jim Yarbrough for interview of Witness 1; tour Senate for staging trial; telephone conference with House Board of Managers for update on	12.50 500.00/hr	6,250.00

		HRS/RATE	AMOUNT
8/24/2023 LMG	status of outline and meeting schedule next week; review materials in preparation for trial. Prepare for trial; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; attention to document production and issues relating to same; attention to issues relating to witness examinations; continue preparing presentation to House Board Managers.	13.75 500.00/hr	6,875.00
JB	Trial preparation; phone call with Armie Lewis regarding witness interview.	10.00 500.00/hr	5,000.00
LH	Draft response to motion for sanctions; create chart in support of response to motion for sanctions.	1.25 500.00/hr	625.00
DD	Review and analyze notes and documents regarding interviews with Witness 1 and Witness 2 for use in preparing pretrial presentation to House Board of Managers; preparation of outline topics to be covered during direct examination of Witness 3.	8.00 500.00/hr	4,000.00
ACL	Prepare for Witness 1 interview; drafting memo regarding witness interview with Witness 1; travel to Austin with Rusty Hardin and Jim Yarbrough for Witness 1 interview; travel back to Houston from Austin with Rusty Hardin and Jim Yarbrough; attend Witness 1 interview; phone call with Jenny Brevorka regarding Witness 2 interview; conferences with Sylvia Martinez regarding Uber chart and transcript excerpts.	16.00 500.00/hr	8,000.00
AD	Defense exhibits review.	5.25 500.00/hr	2,625.00
SMZ	Work to find accurate latitude and longitude locations and revise chart with same; send revised chart to Armie Lewis for review; conference with Armie Lewis regarding transcript excerpts for chronology; proofread and revise	4.75 200.00/hr	950.00

		HRS/RATE	AMOUNT
	chart of exhibits; review, identify and prepare excerpts from transcripts and send to Armie Lewis for review.		
8/24/2023 LBH	Continue outlining legal issues for lead trial lawyers.	2.50 300.00/hr	750.00
RG	Correspondence with client; attention to pretrial issues.	2.50 500.00/hr	1,250.00
SJ	Work on supplemental production; update production log.	3.00 200.00/hr	600.00
JY	Travel to and from Austin for witness interview; witness interview.	11.50 200.00/hr	2,300.00
TW	Review videos of Nate Paul's interviews.	5.75 50.00/hr	NO CHARGE
8/25/2023 RH	Multiple telephone calls with Jenny Brevorka; review documents in preparation for production and trial.	7.00 500.00/hr	3,500.00
LMG	Prepare for trial; continue to review and analyze documents produced in response to subpoenas; prepare attorney work product relating to same; attention to document production and issues relating to same.	10.50 500.00/hr	5,250.00
JB	Trial preparation; multiple phone calls with Rusty Hardin; telephone conference with Lara Hollingsworth regarding privilege issues.	8.00 500.00/hr	4,000.00
LH	Revise and finalize response to motion for sanctions; telephone conference with Jenny Brevorka regarding privilege issues.	0.75 500.00/hr	375.00
ACL	Draft memo regarding witness interview; drafting timeline and contact list; phone calls regarding witnesses.	10.25 500.00/hr	5,125.00
AD	Defense exhibits review.	3.00 500.00/hr	1,500.00

			HRS/RATE	AMOUNT
8/25/2023	B LBH	Continue outlining legal issues for lead trial lawyers.	3.50 300.00/hr	1,050.00
	SJ	Upload multiple subpoenaed document sets to database; prepare supplemental productions and serve same on opposing counsel; prepare witness interview materials for board members and send Sharefile link to same; update production log; attention to general trial logistics.	7.00 200.00/hr	1,400.00
	JY	Review interview memos and discovery.	4.50 200.00/hr	900.00
	EAB	Review AG's list and exhibits; update the exhibit list with a description of each exhibit.	7.00 200.00/hr	1,400.00
	TW	Summarize deposition for Leah Graham.	5.25 50.00/hr	NO CHARGE
8/26/2023	RH	Review documents, including previous interviews and exhibits in preparation for trial; telephone call with Lara Hollingsworth and Jenny Brevorka regarding presentation and news updates.	7.50 500.00/hr	3,750.00
	LMG	Prepare for trial; continue to review documents and prepare attorney work product relating to same; attention to document production and issues relating to same; continue preparing for presentation to House Board of Managers.	14.25 500.00/hr	7,125.00
	JB	Prepare for trial; phone call with Lara Hollingsworth and Rusty Hardin about presentation and evolving news updates.	1.50 500.00/hr	750.00
	LH	Review OAG privilege log; call with Jenny Brevorka and Rusty Hardin regarding presentation and news updates.	1.00 500.00/hr	500.00
	ACL	Draft timeline; draft order of proof.	2.50 500.00/hr	1,250.00
	LBH	Phone conference with legal team.	1.00 300.00/hr	300.00

			HRS/RATE	AMOUNT
8/26/2023	RG	Attention to pretrial issues; correspondence with	1.00	500.00
		co-counsel.	500.00/hr	300.00
8/27/2023	RH	Review documents, including previous interviews and exhibits in preparation for trial; meeting with team regarding case strategy.	7.00 500.00/hr	3,500.00
	LMG	Prepare for trial; continue to review and analyze documents produced in response to subpoenas; prepare attorney work product relating to same; attention to document production and issues relating to same; prepare for upcoming presentation to House Board of Managers.	13.00 500.00/hr	6,500.00
	JB	Prepare for trial; prepare for client meeting about trial.	13.00 500.00/hr	6,500.00
	LH	Meeting with legal team regarding OAG privilege log; preparation of legal materials for trial; telephone conference with House counsel regarding opening statement; telephone conference with Rusty Hardin regarding opening statement.	5.00 500.00/hr	2,500.00
	ACL	Draft timeline; meeting with Rusty Hardin, Daniel Dutko, Leah Graham, Stella Jares, Stacey Manela, Jenny Brevorka, and Lara Hollingsworth regarding trial strategy.	4.25 500.00/hr	2,125.00
	RG	Attention to pretrial issues regarding pretrial motions; evaluate background; telephone conference with co-counsel.	2.25 500.00/hr	1,125.00
	JA	Communications with team regarding legal notebooks and chronology.	0.25 200.00/hr	NO CHARGE
	SJ	Update subpoena log; team meeting to discuss trial themes, order of witnesses and use of key exhibits; preparation of documents for attorneys' use at trial.	7.00 200.00/hr	1,400.00
8/28/2023	RH	Travel to Austin; work on presentation to House Managers; review and edit presentation.	9.50 500.00/hr	4,750.00

		HRS/RATE	AMOUNT
8/28/2023 LMG	Prepare for trial; continue to review documents and prepare attorney work product relating to same; attention to document production and issues relating to same; continue preparing presentation to House Board of Managers.	15.50 500.00/hr	7,750.00
МСМ	Cross-reference House Managers' responses' exhibits and trial exhibits; supplement first amended exhibit list in reference to same; confer with Leah Graham regarding project status and updates; search for and compile trial exhibits in Disco to facilitate preparation for trial.	11.00 500.00/hr	5,500.00
JB	Prepare for trial; prepare for House Board of Managers presentation; travel to Austin.	17.00 500.00/hr	8,500.00
LH	Meeting with House counsel and House Managers regarding opening statement and trial strategy; preparation of legal materials for trial; telephone conference with House Board of Managers regarding trial preparation and witness lists.	3.50 500.00/hr	1,750.00
ACL	Travel with Rusty Hardin and Jenny Brevorka to Austin for trial preparation; call with Julie Ayers regarding chronology; draft chronology; calls regarding witness preparation; edit presentation for House Board of Managers.	14.75 500.00/hr	7,375.00
SMZ	Emails with Lara Hollingsworth regarding preparation of motions notebooks; work with Stella Jares to identify additional documents for notebooks; prepare electronic version of notebooks.	4.00 200.00/hr	800.00
RG	Attention to pretrial issues; telephone conference; research.	5.75 500.00/hr	2,875.00
JA	Communications with Armie Lewis regarding chronology; communications with Leah Graham and Stella Jares regarding access to DISCO; work on chronology documents.	6.75 200.00/hr	1,350.00

		HRS/RATE	AMOUNT
8/28/2023 SJ	Attention to final trial logistics and organize materials for transporting to Austin.	8.50 200.00/hr	1,700.00
JY	Review discovery in preparation for trial.	6.00 200.00/hr	1,200.00
KN	Prepare indexes to documents for attorneys' use at trial; send links for trial supplies.	0.25 50.00/hr	NO CHARGE
8/29/2023 RH	Meeting with Jenny Brevorka, Stacey Manela, and Armie Lewis to finalize presentation to House Managers; meeting afterwards with client and trial teams to discuss order of witnesses and assignments; review materials in preparation for trial; travel to Houston and review of trial exhibits; conference with trial team to discuss order and preparation of witnesses; further review of exhibits in preparation for trial.	19.00 500.00/hr	9,500.00
LMG	Prepare for trial; continue to review and analyze documents produced in response to subpoenas and prepare attorney work product relating to same; attention to document production and issues relating to same; continue preparing for presentation to House Board of Managers; travel to Austin for trial.	14.75 500.00/hr	7,375.00
MCM	Attention to resolving issues regarding potential additional exhibits to the amended exhibit list; follow-up emails with Armie Lewis and Leah Graham regarding same; gather documents and information related to witness preparation; emails with Leah Graham and Stella Jares regarding same; email to internal RH&A with general employment law note in preparing witnesses.	9.50 500.00/hr	4,750.00
JB	Prepare for presentation to House Board of Mangers; meeting with Rusty Hardin, Stacey Manela, and Armie Lewis about presentation; prepare for trial.	13.00 500.00/hr	6,500.00
LH	Travel to Austin for impeachment trial; attend trial presentation meeting with House Managers.	5.00 500.00/hr	2,500.00

			HRS/RATE	AMOUNT
8/29/2023	ACL	Draft chronology; meet with House Board of Managers; edit presentation for House Board of Managers.	15.50 500.00/hr	7,750.00
	AD	Media monitoring.	2.00 500.00/hr	NO CHARGE
	AD	Review news articles and witness interviews; assignment regarding sealed order.	4.75 500.00/hr	2,375.00
	SMZ	Work on final version of documents for notebooks; emails with Stella Jares and Lara Hollingsworth; telephone conference with Lara Hollingsworth regarding motions for notebooks; draft index and spines for notebooks; email to Stella Jares and Lara Hollingsworth with final electronic version of notebooks for printing.	2.00 200.00/hr	400.00
	LBH	Trial preparation.	3.25 300.00/hr	975.00
	RG	Attention to trial preparation; correspondence with co-counsel; telephone conference with co-counsel.	3.00 500.00/hr	1,500.00
	JA	Telephone call with DISCO; work on chronology documents; communications with Armie Lewis regarding chronology documents.	3.50 200.00/hr	NO CHARGE
	SJ	Travel to Austin; set up hotel war room and handle various logistics issues; upload subpoenaed document productions; several team meetings to prepare for witness preparation interviews.	8.50 200.00/hr	1,700.00
	JY	Travel to Austin for witness interviews; trial preparation.	8.75 200.00/hr	1,750.00
8/30/2023	RH	Review materials in preparation for trial; attendance at walk through by Lt. Governor; review pleadings and materials for trial during trip to Houston; continue review of materials for trial.	7.00 500.00/hr	3,500.00

		HRS/RATE	AMOUNT
8/30/2023 LM	IG Prepare for trial.	13.50 500.00/hr	6,750.00
MC	CM Attention to preparing AG exhibits in searchable form to facilitate trial preparation; review documents for witness cross-examination preparation; conference call with Leah Graham regarding amended exhibit list status.	3.50 500.00/hr	1,750.00
JB	Tour Senate building; prepare for trial.	9.75 500.00/hr	4,875.00
DD	Travel to Austin to attend impeachment trial; attend walk-through at Senate and pretrial rulings of Lt. Gov. Dan Patrick; attend witness interview.	9.50 500.00/hr	4,750.00
LH	Senate walk-through with trial team; review Dick DeGuerin notes regarding opening statement; review witness appearance order; review presentation slide deck in preparation for opening statement.	4.00 500.00/hr	2,000.00
AD	Travel to Austin; Senate tour; meeting with team; work on term list for court reporter; team call with Rusty Hardin; continue terms list for court reporter.	11.00 500.00/hr	5,500.00
AC	Walk-through at the Senate; preparing materials and draft outline for witness preparation; prepare regarding witness interview; trial team meeting regarding tasks with Jenny Brevorka, Lara Hollingsworth, Leah Graham, Daniel Dutko, Aisha Dennis, and Stella Jares.	14.00 500.00/hr	7,000.00
AD	Media monitoring.	1.75 500.00/hr	NO CHARGE
LBI	Attend pre-trial hearing in Senate Chambers; meet with legal team afterwards to discuss legal issues anticipated at trial; follow-up on legal issues.	5.25 300.00/hr	1,575.00

		HRS/RATE	AMOUNT
8/30/2023 RG	Trial preparation; conference with co-counsel.	7.25	3,625.00
		500.00/hr	
JA	Update chronology documents; communications with Armie Lewis regarding same.	0.50 200.00/hr	100.00
SJ	Team meetings to discuss upcoming witness interviews and exhibits; war room logistics; prepare chronology notebooks; participate in official walk through at the Senate; preparation of documents for attorneys' use at trial; upload subpoenaed documents and prepare 21st supplemental production to serve on opposing counsel.	11.50 200.00/hr	2,300.00
JY	Trial preparation.	9.00 200.00/hr	1,800.00
8/31/2023 RH	Interview of witness in preparation for trial; planning meeting with team to discuss witnesses, exhibits, and review materials for trial; dinner with trial team.	11.00 500.00/hr	5,500.00
LMG	Prepare for trial.	15.00 500.00/hr	7,500.00
МСМ	Review and analyze all HBOM response exhibits on HBOM trial list for accuracy and completeness.	6.75 500.00/hr	3,375.00
JB	Prepare for trial; meet with clients about trial; witness preparations.	14.00 500.00/hr	7,000.00
LH	Meeting with Jenny Brevorka and House Board of Managers regarding opening statement, witness order, attorney examination, draft opening statement; meeting with Ross Garber and Harriett O'Neill regarding preparation of legal issues and responses for trial.	7.00 500.00/hr	3,500.00
ACL	Prepare materials and draft outline for witness preparation; witness preparation; meeting with Rusty Hardin and Board of Managers lawyer regarding witness order; meeting regarding trial strategy with Leah Graham, Jim Yarbrough,	13.25 500.00/hr	6,625.00

			HRS/RATE	AMOUNT
		Aisha Dennis, Jenny Brevorka, Rusty Hardin, and Lara Hollingsworth.	- 31 - 10	
8/31/2023	AD	Twitter search for Chris Hilton video; shared exhibit lists; lunch meeting with Rusty Hardin and team; formalize notes from Senate walk-through.	7.50 500.00/hr	3,750.00
	AD	Media monitoring.	0.75 500.00/hr	NO CHARGE
	RG	Trial preparation; conference with co-counsel.	6.50 500.00/hr	3,250.00
	SJ	Preparation of documents for attorneys' use at trial; upload subpoenaed document productions; general trial preparations.	12.00 200.00/hr	2,400.00
	JY	Trial preparation.	10.00 200.00/hr	2,000.00
	Total	Legal Fees This Invoice	4,285.00	\$1,558,850.00
	EXPE	NSES		
7/3/2023	JY	Online Research - Find Name S3 Sleep Investment Office of the Secretary of State #126335116 Amex 08/23	ts LLC	1.00
	JY	Online Research - Find Name Huntington Creek Ca Office of the Secretary of State #126338542 Amex 08/23	apital VI LLC	1.00
	JY	Online Research - Find Twin Village Management, LLC, WCP Fund GP LLC, and 281 WB GP LLC Office of the Secretary of State #126326131 Amex 08/23		3.00

		AMOUNT
7/3/2023 JY	Online Research - Find/Find by Global People Name Sundance Memory Care, Sundance at Brushy Creek, and "Sundance" Office of the Secretary of State #126325174 Amex 08/23	4.00
7/6/2023 RH	Transportation from residence to Hobby Airport Genesis Corporate Transportation #25221 (Fare discounted to be comparable to Uber) Amex 08/23	28.00
RH	Transportation from airport to Reagan Building Interview of Witness 1 and Witness 2 Lonestar Cab Rusty Hardin Expense Report	61.98
RH	Uber ride from hotel to airport Amex 07/23	50.88
RH	Airfare - Round trip Houston (Hobby) to Austin Southwest Airlines #5262475496790 Amex 07/23	500.00
LMG	No. 1992Cl03541 - Kehoe v Kehoe Bexar County, 224th District Court Letter to District Clerk requesting copy of divorce file Envelope Id #77276097 VISA 07/23	3.00
LMG	No. 2022CI14695 - Gonzales v. Olson Bexar County, 224th District Court Letter to District Clerk requesting copy of divorce file Envelope Id #77275263 VISA 07/23	5.00
LMG	No. 1997Cl10831 - Olson v. Trevino Bexar County, 37th District Court Letter to District Clerk requesting copy of divorce file Envelope Id #77275818 VISA 07/23	30.00
LMG	No. 2006Cl06326 - Saenz v. Saenz Bexar County, 224th District Court Letter to District Clerk requesting copy of divorce file	52.47

		AMOUNT
	Envelope Id #77275537 VISA 07/23	
7/6/2023 JY	Round-trip mileage to Austin 275 miles @ \$0.655 per mile plus tolls \$6.64 Jim Yarbrough Expense Report	186.77
JY	Parking - Capitol Visitors Parking Garage Amex 07/23	11.00
7/11/2023 JY	Online Research - Name Find Huntington Creek Capital Office of the Secretary of State #126563049 Amex 08/23	1.00
JY	Online Research - Find by Registered Agent and Global People Name - Cammack Office of the Secretary of State #126562922 Amex 08/23	2.00
7/12/2023 RH	Parking at RH&A for Board of Managers lawyer	20.00
7/13/2023 RH	Parking at RH&A for Board of Managers lawyer and witness for pretrial meeting	45.00
7/14/2023 RH	Return Delivery to Stella Jares Rusty Hardin Case/Trial Materials FedEx Tracking ID #781161308810 Amex 08/23	42.07
JY	Public Information Requests City of Houston #INV23-W125238-1 Amex 08/2023	7.67
7/17/2023 RH	Parking at RH&A for Dick DeGuerin for pretrial meeting	20.00
SJ	24 Notebooks - Potential Trial Exhibits Black & white digital prints (letter and legal), tabs, and binders FLIP Document Services #6070 Amex 09/2023	1,014.82
JY	Online Research - Find/Find by Global People Name Wise Design Services, CTA Enterprises LLC, Harkor Homes LLC, Acquisition Holdings LLC,	15.00

		AMOUNT
	Big State Property Ventures LLC, Denyer Holdings Corporation LLC, Bomerang Finance Sub-Reit, Nate Paul, Allen J Fisher, Houston Design Build LLC, Ingrid Gray, Ingrid W Gray, and Mansour and Associates PC Office of the Secretary of State #126731034 Amex 08/23	
7/18/2023 RH	Lodging in Austin (2-night stay & parking) Rusty Hardin, Jim Yarbrough, Armie Lewis, and Jenny Brevorka DoubleTree Suites by Hilton Austin Amex 08/23	1,159.49
RH	Toll Fees Central Texas Regional Mobility Authority Grand Parkway Northwest Mainline Plaza Harris County Toll Road Authority	3.32
7/19/2023 RH	Parking in Austin Lanier Parking Amex 08/23	14.00
JY	Airfare - One way Austin to Houston (IAH) United Airlines #0162312258186 MasterCard 08/23	185.90
JY	Transportation from Reagan Building to airport Uber	36.15
JY	Transportation from airport (IAH) to residence Uber	108.89
7/21/2023 RH	Remote technical support after hours Assistance with downloading FTP file Service Ticket #862349 IAG Business Technology #37960	102.90
7/26/2023 LH	Book Impeachment: A Handbook, New Edition Lara Hollingsworth Expense Report	8.49
SJ	Audio Transcriptions Recording of Meeting 1; Recording of Meeting 2; Recording of Meeting 3;	930.00

		AMOUNT
	Recording of Meeting 4; Recording of telephone call 1; & Recording of Voicemail 1 Infinity Reporting Group, LLC #22850 Amex 09/2023	
7/26/2023 JY	Online Research - Find/Find by Global People Name Kevin Wood Landscapes/Kevin Wood (Austin, TX) Office of the Secretary of State #126993239 Amex 08/23	2.00
7/30/2023 LH	Book Impeachment: The Constitutional Problems Lara Hollingsworth Expense Report	22.15
7/31/2023 RH	NY Herald The Real Deal Digital Package VISA 08/2023	1.00
RH	AT&T Teleconference Services (5) - July 2023 Amex 09/23	211.29
RH	Hosting storage, user licensing, and other eDiscovery services for June and July 2023 CS Disco, Inc. #302253 Amex 10/2023	29,854.44
LH	Westlaw Charges for July 2023 Amex 08/23	722.38
JB	Westlaw Charges for July 8, 10, and 25-28, 2023 Amex 08/23	730.56
DD	PACER Charges for July 31, 2023 Amex 08/2023	0.10
ACL	Westlaw Charges for July 5, 2023 Amex 08/23	48.29
JY	Online Research - Find/Find by Assumed Name/Find by Global People Name World Class Holdings, Nate Paul, WC 4th and Colorado LP, and WC 4th Office of the Secretary of State #127079641 Amex 08/23	5.00

			AMOUNT
7/31/2023	JY	Online Research - Find/Find by Global People Name Austin Medical Group/Sheena Paul, Pearl Paul, Love Paul, and Sean Paul Office of the Secretary of State #127093222 Amex 08/23	5.00
	JY	Online Research - Find/Find by Global People Name World Class Capital Group/Natin Paul Office of the Secretary of State #127090402 Amex 0823	2.00
	JY	Online Research TransUnion - TLOxp Charges - July 2023	282.49
	JY	PACER Charges - July 10, 2023 Amex 08/2023	3.30
45	JY	Online Research - July 10-13 and 26-28, 2023 IDI #IN532747 Amex 08/23	57.56
	SM	In-House Copies - July 2023 77 black and white copies @ \$0.10 per copy	7.70
8/1/2023	RH	Hosting storage, user licensing, and other eDiscovery services for July 8 and 19, 2023 and August 2023 CS Disco, Inc. #316605 Amex 09/2023	4,058.28
	JY	Online Research - Find by Global People Name Pearl Paul and Sean Paul Office of the Secretary of State #127107291 Amex 09/23	2.00
	ELG	Electronic storage 1TB portable SSD and 2TB USB Micro Center Amex 08/23	211.07
8/3/2023	SJ	Tech Time - Transferring data to another hard drive FLIP Document Services #6111	357.23

		AMOUNT
8/3/2023 JY	Parking in Austin COA Parking Meters Jim Yarbrough Expense Report	2.25
JY	Round-trip mileage to Austin 275 miles @ \$0.655 per mile Jim Yarbrough Expense Report	180.13
8/4/2023 RH	Airfare - Round trip Houston (IAH) to Nashville Witness Interview United Airlines #0162316140270 MasterCard 09/2023	449.90
RH	Transportation from residence to airport (IAH) Genesis Corporate Transportation #25521 (Fare discounted to be comparable to Uber) Amex 08/2023	42.00
RH	Transportation from airport (IAH) to residence Genesis Corporate Transportation #25522 (Fare discounted to be comparable to Uber) Amex 08/2023	42.00
RH	Transportation to airport (BNA) Uber Amex 08/23	59.02
RH	Transportation in TN Lateef Fayemi Amex 08/23	43.75
RH	Parking at RH&A for three people for pretrial meeting	45.00
ACL	Airfare - Round trip Houston (IAH) to Nashville Witness Interview United Airlines #0162316141279 MasterCard 09/2023	449.90
8/7/2023 SJ	24 Notebooks Digital prints, tabs, and binders FLIP Document Services #6120	1,128.90

		<u>-</u>	AMOUNT
8/8/2023	JY	Online Research - Find Name Cupertino Builders Office of the Secretary of State #127310636 Amex 09/23	1.00
	JY	Online Research - Find Esther Blind Trust and The Esther Blind Trust Office of the Secretary of State #127293851 Amex 09/23	3.00
	JY	Retrieval of records Delaware Corp & Tax Web File No. 7937577 Amex 09/89	20.00
8/9/2023	RH	Lodging in Austin (1-night stay & parking) Rusty Hardin, Jim Yarbrough, and Armie Lewis DoubleTree Suites by Hilton Austin Amex 09/2023	882.19
	RH	Toll Fees Harris County Toll Road Authority (August Statement)	4.56
	LMG	Rush Transcription - Expedited Interviews (07/21/2020 and 08/05/2020) Infinity Reporting Group, LLC #22861 Amex 09/2023	3,607.76
	SJ	Delivery to Allison Collins, Stone Hilton FedEx Tracking ID #773002845336	25.88
8/10/2023	RH	Toll Fees Harris County Toll Road Authority (August Statement)	3.32
	LMG	Rush Transcription, 2-Day Expedited Interview of Witness Infinity Reporting Group, LLC #22860 Amex 09/2023	1,318.08
8/11/2023	SJ	Scanning litigation and OCR searchable text Impeachment the Constitutional Problems FLIP Document Services #6129	63.30

		AMOUNT
8/11/2023 SJ	Digital prints, tabs, and binders Materials related to witness Flip Document Services #6128	631.64
JY	Online Research - Find Name World Class Holdings Office of the Secretary of State #127390037 Amex 09/23	1.00
8/12/2023 JY	Online Research - Find Name World Class Capital Group and witness Office of the Secretary of State #127412870 Amex 09/23	2.00
8/13/2023 JY	Online Research - Find Rio Lounge and Rio Austin Office of the Secretary of State #127417105 Amex 09/23	3.00
JY	Online Research - Find Rio Austin, Rio Rooftop Pool Lounge & Restaurant, Rio, and WC 6th & Rio Grande Office of the Secretary of State #127417181 Amex 09/23	5.00
8/14/2023 RH	Transportation from residence to Hobby Airport (Fare discounted to be comparable to Uber) Genesis Corporate Transportation #25650	28.00
RH	Airfare - Round trip Houston (Hobby) to Dallas Southwest Airlines #5262489846093 Amex 09/2023	500.00
RH	Transportation from Hobby Airport to residence (Fare discounted to be comparable to Uber) Genesis Corporate Transportation #25651	28.00
LMG	Rush Transcription - Expedited Radio Interviews (12/02/2021 and 01/31/2022) Infinity Reporting Group, LLC #22857 Amex 09/2023	261.90
ACL	Airfare - Round trip Houston (Hobby) to Dallas Southwest Airlines #5262489846180 Amex 09/2023	500.00

		AMOUNT
8/14/2023 ACL	Parking at airport in Houston The Parking Spot Armie Lewis Expense Report	12.97
ACL	Transportation in Dallas Uber Armie Lewis Expense Report	42.74
JY	Online Research - Find Cerberus SFR Office of the Secretary of State #127438651 Amex 09/23	1.00
JY	Online Research Find Name FKH SFR Propco B-HLD, LP/Cerberus Office of the Secretary of State #127438342 Amex 09/23	2.00
JY	Transportation from Frisco to Dallas Rusty Hardin, Armie Lewis, Dick DeGuerin, and Jim Yarbrough Uber Amex 09/23	93.58
JY	Transportation from Dallas to Frisco Uber Amex 09/23	105.00
JY	Airfare - Round trip Houston (Hobby) to Dallas Southwest Airlines #5262489846141 Amex 09/2023	500.00
8/16/2023 RH	Professional services for July 26, 2023 - August 12, 2023 Expert forensic accounting services Nicholas DAmbrosio, Jr.	13,275.00
8/18/2023 SJ	Round-trip mileage to Austin 328 miles @ \$0.655 per mile Stella Jares Expense Report	214.84
SJ	46 Notebooks Digital prints, tabs, and binders FLIP Document Services #6141	6,890.31

		AMOUNT
8/21/2023 LMC	Rush Transcription Senate Finance Committee Hearing Regarding Cammack Engagement Infinity Reporting Group, LLC #22914 Amex 09/2023	92.50
JY	Round-trip mileage to Austin 280 miles @ \$0.655 per mile plus tolls \$6.64	190.04
JY	Lodging in Austin (1-night stay, parking, and food) DoubleTree Suites by Hilton Austin Amex 09/2023	214.40
8/22/2023 LMC	Rush Transcription - 4-Day Rush Audio of Voicemails Infinity Reporting Group, LLC #22960 Amex 09/2023	131.16
LMG	Rush Transcription - 3-Day Rush Audio of Appropriations Committee Infinity Reporting Group, LLC #22961 Amex 09/2023	661.62
8/24/2023 JY	Round-trip mileage to Austin 280 miles @ \$0.655 per mile plus tolls \$6.64	190.04
8/25/2023 SJ	4 Sets of Trial Exhibits (2 HBOM, 2 AG) Digital prints, tabs, binders, electronic Bates labeling, and exhibit stamping FLIP Document Services #6150	14,797.99
8/27/2023 JY	Professional services - August 26 and 27, 2023 Superior Investigating and Consulting, LLC Invoice #23-SUB-0001 Amex 09/2023	2,168.00
8/28/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	153.27
RH	Toll Fees Harris County Toll Road Authority (August Statement)	10.29

		AMOUNT
8/28/2023 RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	153.27
RH	Parking fee for six non-reserved parking spaces Rusty Hardin, Daniel Dutko, Megan Moore, Leah Graham, Stella Jares, and Stacey Manela. Moody Parking Garage Amex 10/2023	1,419.00
LH	One way mileage to hotel in Austin 154 miles @ \$0.655 per mile Lara Hollingsworth Expense Report	100.87
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	153.27
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	153.27
RG	Airfare - One way New Orleans to Austin Ross Garber American Airlines The Garber Group LLC #1171	236.90
ELG	Transportation from office to Capps Van & Truck Rental to pick up van for transport of documents and equipment to Austin Uber Amex 09/2023	21.92
ELG	Fuel for rental van Exxon Mobil Amex 09/2023	64.41

		AMOUNT
8/28/2023 ELG	Van rental to transport documents and equipment to Austin (partial payment) Capps Van & Truck Rental Amex 09/2023	344.85
8/29/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	153.27
RH	Transportation from hotel Uber Amex 09/2023	20.47
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	153.27
LH	Transportation to hotel Uber Lara Hollingsworth Expense Report	14.38
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	153.27
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	153.27
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	153.27
LH	Valet parking at hotel (parking card not yet available) DoubleTree Hotel Amex 10/2023	43.30

		AMOUNT
8/29/2023 AC	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	153.27
SJ	One way mileage to Austin 164 miles @ \$0.655 per mile Stella Jares Expense Report	107.42
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	153.27
JY	Transportation to hotel Uber Amex 09/2023	29.26
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	153.27
ELC	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	153.27
ELC	Valet parking rental van to unload documents and equipment transported from Houston Doubletree Hotel Amex 10/2023	43.30
8/30/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	153.27
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	153.27

		AMOUNT
8/30/2023 JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	153.27
LMG	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	153.27
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	153.27
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	153.27
AD	Transportation from Barton Springs bus terminal to Austin hotel Uber Aisha Dennis Expense Report	9.92
AD	Transportation from residence to Hyatt Regency Downtown for pickup by Vonlane bus for trip to Austin Uber Aisha Dennis Expense Report	43.53
AD	One way Vonlane bus fare to Barton Springs bus terminal Aisha Dennis Expense Report	129.00
ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	153.27
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	153.27

		AMOUNT
8/30/2023 RG	Transportation from airport to hotel Ross Garber Taxi The Garber Group LLC #1171	65.00
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	153.27
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023	153.27
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023	153.27
ELG	Final payment for rental van Capps Van & Truck Rental Amex 09/2023	114.95
ELG	Hotel Room plus taxes in Austin for trial Eddie Gaines Doubletree Hotel Amex 10/2023	153.27
ELG	Valet parking rental van a hotel to deliver documents, equipment and supplies to work rooms Doubletree Hotel Amex 10/2023	43.30
8/31/2023 RH	Hotel Room plus taxes in Austin for trial Stacey Manela Doubletree Hotel Amex 10/2023	153.27
RH	Hotel Room plus taxes in Austin for trial Rusty Hardin Doubletree Hotel Amex 10/2023	153.27

		AMOUNT
8/31/2023 JR	Westlaw Charges for August 2023 Amex 09/2023	1,010.22
LH	Westlaw Charges for August 1-16, 2023 Amex 09/2023	1,564.45
TK	PACER Charges - August 1, 14, and 25, 2023 Amex 09/2023	38.20
МС	M Westlaw Charges for August 2023 Amex 09/2023	1,197.91
JB	Westlaw Charges for August 10 and 12, 2023 Amex 09/2023	118.25
ES	Westlaw Charges for August 9-11, 2023 Amex 09/2023	130.11
LMO	Westlaw Charges for August 14, 15, and 28, 2023 Amex 09/2023	338.15
JB	Blowback printing Array #X78165	863.29
JB	Hotel Room plus taxes in Austin for trial Jenny Brevorka Doubletree Hotel Amex 10/2023	153.27
LMC	Hotel Room plus taxes in Austin for trial Leah Graham Doubletree Hotel Amex 10/2023	153.27
LH	Hotel Room plus taxes in Austin for trial Lara Hollingsworth Doubletree Hotel Amex 10/2023	153.27
DD	Hotel Room plus taxes in Austin for trial Daniel Dutko Doubletree Hotel Amex 10/2023	153.27

		AMOUNT
8/31/2023 ACL	Hotel Room plus taxes in Austin for trial Armie Lewis Doubletree Hotel Amex 10/2023	153.27
AD	Hotel Room plus taxes in Austin for trial Aisha Dennis Doubletree Hotel Amex 10/2023	153.27
AD	Westlaw Charges - August 2023	393.91
RG	Hotel Room plus taxes in Austin for trial Ross Garber Doubletree Hotel Amex 10/2023	153.27
SJ	6 Notebooks Blowback printing with assembly, tabs, and binders Array #X78173	481.93
SJ	8 Notebooks Blowback printing with assembly, tabs, and binders Array #X78174	642.57
SJ	8 Notebooks Blowback printing with assembly, tabs, and binders Array #X78172	655.13
SJ	13 Notebooks Blowback printing with assembly, tabs, and binders Array #X78169	2,104.00
SJ	20 Notebooks Blowback printing with assembly, tabs, and binders Array #X78170	2,417.76
SJ	51 Notebooks Blowback printing with assembly, tabs, and binders Array #X78168	5,575.04

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		_	AMOUNT
8/31/2023 SJ	1 Notebook - Trial Preparation Black & white digital prints, tabs, and binder FLIP Document Services #6176		46.20
SJ	Hotel Room plus taxes in Austin for trial Stella Jares Doubletree Hotel Amex 10/2023		153.27
JY	Online Research TransUnion - TLO Charges - August 2023 Amex 10/2023		127.92
JY	Online Research - August 2023 IDI #IN551718 Amex 09/2023		55.43
JY	Hotel Room plus taxes in Austin for trial Jim Yarbrough Doubletree Hotel Amex 10/2023		153.27
ELG	Fuel for rental van Exxon Mobile Amex 09/2023		50.01
ELG	Valet parking for rental van DoubleTree Hotel Amex 09/2023		43.30
ELG	Tip to valet		25.98
Total	Expenses	<u>\$</u>	117,413.86

\$1,676,263.86

Total Fees and Expenses this Invoice

Timekeeper Summary

Name Timekeeper Summary			
Rusty Hardin	HOURS	RATE	
Daniel Dutko	408.25	500.00	5 N (8)
Daniel Dutko	61.25	500.00	\$30,625.00
	2.00	0.00	\$0.00
Emily Smith	9.25	500.00	\$4,625.00
Emily Smith	0.25	0.00	\$0.00
Jennifer Brevorka	395.50	500.00	\$197,750.00
Jennifer Brevorka	37.25	0.00	\$0.00
Joe Roden	51.50	500.00	\$25,750.00
Lara Hollingsworth	362.25	500.00	\$181,125.00
Lara Hollingsworth	4.25	0.00	\$0.00
Leah Graham	585.00	500.00	\$292,500.00
Leah Graham	8.00	0.00	\$0.00
Megan Moore	153.75	500.00	\$76,875.00
Megan Moore	1.25	0.00	\$0.00
Aisha Dennis	81.75	500.00	\$40,875.00
Aisha Dennis	35.50	0.00	\$0.00
Armstead Lewis	417.50	500.00	\$208,750.00
Armstead Lewis	6.00	0.00	\$0.00
Kendall Speer	3.25	0.00	\$0.00
Claude Ducloux	24.50	500.00	\$12,250.00
Lisa Hobbs	165.25	300.00	\$49,575.00
Ross Garber	175.25	500.00	\$87,625.00
Sylvia Martinez	31.25	200.00	\$6,250.00
Julie Ayers	11.00	200.00	\$2,200.00
Julie Ayers	4.00	0.00	\$0.00
Stella Jares	391.75	200.00	\$78,350.00
Jim Yarbrough	291.00	200.00	\$58,200.00
Jim Yarbrough	1.00	0.00	\$0.00
Elvira Barajas	7.00	200.00	\$1,400.00
Kensington Nulf	7.25	0.00	\$0.00
Martha Vazquez	102.50	0.00	\$0.00
Molly McNamara	96.50	0.00	\$0.00
James Beck Hollingsworth	14.00	0.00	\$0.00
Jodie Aguirre	96.25	0.00	\$0.00
Kylee Nichols	0.25	0.00	\$0.00
Tanner Watson	81.25	0.00	\$0.00
Thomas Smith	120.50	0.00	\$0.00
Zoey Taylor	40.75	0.00	\$0.00
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