

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

OSCAR SALAZAR, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, et al.,

Defendants.

Civil No. 93-452 (TSC)
In Forma Pauperis

**PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF LITIGATION
COSTS, INCLUDING ATTORNEYS' FEES AND EXPENSES,
FOR THE SECOND QUARTER OF 2024**

Pursuant to the terms of the January 25, 1999 Order Modifying the Amended Remedial Order of May 6, 1997 and Vacating the Order of March 27, 1997 (ECF 663) ("Settlement Order"), 42 U.S.C. § 1988, and the Order of July 19, 2004 (ECF 1029) ("July 19, 2004, Order"), Plaintiffs move this Court for an award of attorneys' fees and expenses for their work representing the Plaintiff class in this matter for the second quarter of 2024.

Prior to filing this attorneys' fees request, Plaintiffs followed the procedures in paragraph 67 of the Settlement Order, as amended by the Court's Order of March 19, 2013 (ECF 1801), which provides that Plaintiffs make their fees request first to Defendants and allow the Parties a 45-day period to attempt to settle the attorneys' fees or make a motion to the Court if no agreement is reached within 55 days after submission of the fees request to Defendants. *See* Pl. Ex. 1. The Parties reached an agreement to settle Plaintiffs' request for fees and expenses for the second quarter of 2024. Therefore, this motion requests an award of \$138,281.61 from the Court.

The July 19, 2004, Order sets forth procedures to comply with Rule 23(h)(1) of the Federal Rules of Civil Procedure, which provides that attorneys' fee awards in a class action must be made on motion and that notice must be given to class members. The July 19, 2004, Order provides that, if the Parties reach agreement on the amount of attorneys' fees, Plaintiffs must file an unopposed motion for an award of the agreed amount with documentation of their fees and expenses and allow at least 30 days for notice to the class. Since the Parties have reached an agreement to settle Plaintiffs' request for attorneys' fees and expenses by payment of \$138,281.61, Plaintiffs file the instant motion.

Pursuant to the July 19, 2004, Order, Plaintiffs have filed a separate motion requesting that the Court order the Clerk of the Court to provide notice of this motion to the Plaintiff class by placing a Notice to the Plaintiff Class on the website of the District Court for the District of Columbia. The July 19, 2004, Order provides that the Court may not rule on this motion until the Notice has been on the Court's website for 30 days. At the conclusion of the 30-day notice period, Plaintiffs will file a notice requesting that the Court enter an order for payment of fees and expenses.

STATEMENT PURSUANT TO LOCAL RULE 7(m)

Defendants do not oppose the award of attorneys' fees and expenses set forth in this motion.

Respectfully submitted,

/s/ Zenia Sanchez Fuentes

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March 27, 2025

Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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**PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF THEIR UNOPPOSED
MOTION FOR AN AWARD OF LITIGATION COSTS, INCLUDING
ATTORNEYS' FEES AND EXPENSES, FOR THE
SECOND QUARTER OF 2024**

This class action involves the District of Columbia's ("the District") compliance with federal law in the provision of Medicaid to its citizens. On January 25, 1999, the Court entered an Order based on a settlement between the Parties. Order Modifying the Amended Remedial Order of May 6, 1997 and Vacating the Order of March 27, 1997 (ECF 663) ("Settlement Order"). The Settlement Order (paras. 64-67) includes provisions concerning rates and procedures for the compensation of Plaintiffs' counsel for work done to monitor Defendants' compliance with the Settlement Order. An excerpt of the Settlement Order setting forth the attorneys' fees provisions is attached as Plaintiffs' Exhibit 1. The procedures in those paragraphs have been amended to require quarterly fee petitions by the 2013 "Consent Order Modifying Paragraph 67 of the 'Order Modifying the Amended Remedial Order of May 6, 1997 and Vacating the Order of March 27, 1997' (ECF 663)" (ECF 1801), which is also attached. *See* Pl. Ex. 1, pp. 4-5.

For the three-month period from April 1, 2024, through June 30, 2024, Plaintiffs incurred \$162,684.25 in attorneys' fees and expenses. Pursuant to the Order of July 19, 2004 (ECF 1029),

Plaintiffs submit the instant motion for their fees and expenses and attach documentation substantiating the request. Because the Parties were able to settle this fees request, Plaintiffs now seek only the amount agreed upon in settlement, *i.e.*, \$138,281.61. Defendants do not oppose this request.

ARGUMENT

I

PLAINTIFFS ARE ENTITLED TO AN AWARD OF LITIGATION COSTS, INCLUDING ATTORNEYS' FEES AND EXPENSES

The Supreme Court has held that “post-judgment monitoring of a consent decree is a compensable activity for which counsel is entitled to a reasonable fee.” *Pennsylvania v. Delaware Valley Citizens’ Council*, 478 U.S. 546, 559 (1986). All of the work for which Plaintiffs seek payment in this application involves the monitoring of the Settlement Order or work which resulted directly from the monitoring of the Settlement Order, resolution of individual class members’ issues, settlement discussions, and attorneys’ fees applications. *See* Declaration of Zenia Sanchez Fuentes (“Sanchez Decl.”), Pl. Ex. 2, para. 10. Therefore, Plaintiffs are entitled to an award of attorneys’ fees and expenses.

II

PLAINTIFFS ARE ENTITLED TO AN AWARD OF ATTORNEYS’ FEES FOR ALL TIME REASONABLY EXPENDED

The basic principle for determining an appropriate attorneys’ fee award under federal fee-shifting statutes was set forth by the Supreme Court in *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983): “The most useful starting point for determining the amount of a reasonable fee is the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.”

Hourly rates have been agreed upon by the Parties in the Settlement Order for all work monitoring the Settlement Order and work on behalf of individual class members. Pl. Ex. 1, paras.

64-65; *see* Pl. Ex. 4 (updated rates). The Parties did not agree to rates for non-monitoring work, including the work of Plaintiffs' counsel on enforcement motions, appellate work, settlement work, and attorneys' fees applications. However, as shown below (pp. 8-9), this Court has decided appropriate rates for similar work by Plaintiffs' counsel in this case. *Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 11-15 (D.D.C. 2000) ("*Salazar I*"); *see also Salazar v. District of Columbia*, 750 F. Supp. 2d 70, 72-74 (D.D.C. 2011) ("*Salazar II*"); *Salazar v. District of Columbia*, 991 F. Supp. 2d 39, 47 (D.D.C. 2014) ("*Salazar III*"); *Salazar v. District of Columbia*, 30 F. Supp. 3d 47, 51-52 (D.D.C. 2014) ("*Salazar IV*"). These rates, adjusted for inflation, apply to the attorneys' fees work in this motion that is not subject to the agreed upon rates in paragraphs 64 and 65 of the Settlement Order.

The Court must determine the amount of time reasonably expended on the litigation. *Hensley v. Eckerhart*, *supra*, 461 U.S. at 434. The time included in this application was for work directly related to the representation of the class and, therefore, was reasonably expended. The work of Plaintiffs' counsel for the period from April 1, 2024, through June 30, 2024, is set forth in the time records of Plaintiffs' counsel that summarize the work performed by category and subcategory in Plaintiffs' Exhibits 6 and 7 attached. As stated above, Plaintiffs have agreed with Defendants to compromise the amount of their attorneys' fees in order to reach a settlement.

Before submitting their fees request to the Defendants, Plaintiffs eliminated significant time in the exercise of billing judgment. *See* Sanchez Decl., Pl. Ex. 2, paras. 8-9. The fact that Plaintiffs have made significant reductions to their requested fees in the exercise of billing judgment and have further compromised the remaining amount of fees to reach a settlement supports the determination that this fees request is reasonable.

III

PLAINTIFFS ARE ENTITLED TO COMPENSATION FOR THEIR REASONABLE HOURS UNDER THE AGREED RATES SET FORTH IN THE SETTLEMENT ORDER

A. THE RATES SET FORTH IN THE SETTLEMENT ORDER APPLY TO THE WORK OF MONITORING DEFENDANTS' COMPLIANCE WITH THE SETTLEMENT ORDER AND WORK ON INDIVIDUAL CLAIMS

In the Settlement Order, the Parties agreed to attorneys' fees rates for "monitoring Defendants' compliance with this Order"¹ (Pl. Ex. 1, para. 65) and for work on the "claims of individual class members" (individual claims) (*id.*, para. 64).

In 1998, the rates for monitoring work were \$265 for Kathleen Millian and Jane Perkins, a maximum rate of \$200 for monitoring work by any other attorney, and \$75 for paralegals. Pl. Ex. 1, para. 65. The rates are adjusted annually for inflation based on the Consumer Price Index for Legal Services.

For 2024, monitoring work rates were \$693 for Kathleen Millian and Jane Perkins; \$523 for the maximum rate for other attorneys; and \$196 for paralegals. Pl. Ex. 4, p. 4.

In 1998, the rate for work on individual claims was limited to \$75, regardless of the experience level of the attorney performing the work. This rate is also adjusted annually for inflation based on the Consumer Price Index for Legal Services. *See* Pl. Ex. 1, para. 64. For 2024, the inflation-adjusted rate for individual claims work by attorneys was \$196. *See* Pl. Ex. 4, p. 4.

¹ The 1998 rates are updated annually, as provided in the Settlement Order, by using the Legal Services component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor. *See Pl. Exs. 3-4*. The method for updating is described in paragraph 19 of the Sanchez Declaration.

B. PLAINTIFFS ARE ENTITLED TO COMPENSATION FOR THEIR WORK IN MONITORING THE SETTLEMENT ORDER IN THE SECOND QUARTER OF 2024

For the second quarter of 2024, Terris, Pravlik & Millian, LLP (hereafter, “Terris, Pravlik & Millian”) spent 95 hours (of a total of 609 hours (*see* Pl. Ex. 7)) monitoring Defendants’ compliance with the Settlement Order and working with the District and mediators to develop an exit strategy for the case.²

This work included reviewing and analyzing data from the District’s Fiscal Year 2023 CMS Form 416; reviewing and commenting on the Managed Care Plan (MCP) FY 2024 Corrective Action Plans (CAPs) concerning the annual participant ratio; communications with the District regarding compliance with its obligations pursuant to paragraph 48 to provide explanation for failure to meet required participant ratio; attending DC Medical Care Advisory Committee meetings; reviewing the District’s 2023 External Quality Review Organization, Annual Technical Report of the MCPs’ performance, including childhood performance metrics; appealing the denial by the DHCF of a FOIA request response concerning feedback on the Draft Managed Care Quality Plan for 2024-2027 from the Centers for Medicare and Medicaid Services (CMS), to the Mayor’s Office of Legal Counsel; monitoring District of Columbia legislation affecting the provision of EPSDT services to the Plaintiff class and Defendants’ compliance with the Settlement Order; drafting a letter to HSCSN regarding transportation issues affecting class members with special needs; developing settlement offers, engaging in mediation with Defendants concerning a strategy

² In *Salazar I*, 123 F. Supp. 2d at 10-11, this Court held that the below-market rates in paragraph 65 of the Settlement Order do not apply to the “fees sought for the work of Plaintiffs’ counsel on . . . settlement.” Nonetheless, in the interest of advancing the current exit strategy settlement discussions, Plaintiffs are seeking only the Settlement Order rates for their settlement work. *Sanchez Decl.*, Pl. Ex. 2, para. 14.

to exit the Settlement Order and terminate the case, and providing status updates to the Court concerning these settlement discussions.

The work is summarized in the Sanchez Declaration (Pl. Ex. 2, para. 13). The hours are set forth in Plaintiffs' time records (Pl. Ex. 6) and in the summary of the hours expended (Pl. Ex. 7).

C. PLAINTIFFS ARE ENTITLED TO COMPENSATION FOR THEIR WORK ON INDIVIDUAL CLAIMS IN THE SECOND QUARTER OF 2024

In the second quarter of 2024, Plaintiffs' counsel spent a total of 494 hours assisting numerous individual Medicaid class members with issues related to the Settlement Order, including with grievances, appeals, and fair hearings against the HSCSN managed care plan. Pursuant to paragraph 64 of the Settlement Order, Plaintiffs' counsel are entitled to compensation at the paralegal rate for such work, regardless of the level of experience of the attorney performing the work. The types of cases handled by Plaintiffs' counsel are summarized in the Sanchez Declaration (Pl. Ex. 2, para. 15). The hours are set forth in Plaintiffs' time records (Pl. Ex. 6) and in the summary of the hours expended (Pl. Ex. 7).

IV

PLAINTIFFS ARE ENTITLED TO FEES BASED ON PREVAILING MARKET RATES FOR COMPLEX FEDERAL LITIGATION

Terris, Pravlik & Millian's "non-monitoring work" on behalf of the Plaintiff class, which amounted to 22 hours of the total hours billed, is not subject to the rates agreed upon in the Settlement Order. In *Salazar I, supra*, 123 F. Supp. 2d at 11-15, and in all subsequent fee rulings (*Salazar II, supra*, 750 F. Supp. 2d at 72-74; *Salazar III, supra*, 991 F. Supp. 2d at 47; *Salazar IV, supra*, 30 F. Supp. 3d at 51-52), this Court determined that rates for similar non-monitoring work should be based on the *Laffey* matrix and be adjusted for inflation according to the Legal Services Index (LSI) of the Nationwide Consumer Price Index. In 2015, the Court of Appeals for the District of Columbia Circuit affirmed the most recent fee rulings by this Court (*Salazar III* and *Salazar*

IV), holding that *Laffey* rates based on the LSI were reasonable for the non-monitoring work sought by Plaintiffs in the 2011 and 2012 fee applications. *Salazar v. District of Columbia*, 809 F.3d 58, 63-65 (D.C. Cir.). Thus, for the non-monitoring work in this fee application, Plaintiffs are entitled to compensation based on these rates.

The LSI *Laffey* matrix rates applicable to work performed in this fee petition, updated as of May 31 of each year, are set forth in Plaintiffs' Exhibit 5 and described in the Sanchez Declaration (Pl. Ex. 2, paras. 21-23).

As set forth in the Sanchez Declaration (Pl. Ex. 2, para. 18), Plaintiffs performed attorneys' fees litigation work in the period covered in this fee petition. The attorneys' fees work included the preparation and submission of Plaintiffs' application for fees to the court for the third quarter of 2023, the preparation and submission of a fees request for settlement of the first quarter of 2024, and negotiations of Plaintiffs' fee request for the fourth quarter of 2023.

V

PLAINTIFFS' CO-COUNSEL IS ENTITLED TO COMPENSATION FOR HER REASONABLE HOURS

In addition to compensation for work performed by lead counsel for the Plaintiff class, Terris, Pravlik & Millian, Plaintiffs also seek compensation for their co-counsel, Jane Perkins of the National Health Law Program (NHeLP). Ms. Perkins' declaration and contemporaneous time records for the time period in this application are submitted as Plaintiffs' Exhibits 9 and 10. Plaintiffs seek \$3,121.30 in fees for Ms. Perkins of NHeLP for her work in the second quarter of 2024.

VI

PLAINTIFFS ARE ENTITLED TO AN AWARD OF REASONABLE LITIGATION EXPENSES

In addition to reasonable attorneys' fees, Plaintiffs request an award for out-of-pocket litigation expenses incurred by their counsel. The total amount of expenses incurred in the time period encompassed by this fee application is \$500.45. *See* Sanchez Decl., Pl. Ex. 2, para. 26. Plaintiffs' expenses included out-of-pocket expenses for document production and Westlaw charges. As explained in the Sanchez Declaration (*id.*, para. 26), these categories are ordinarily billed to fee-paying clients in the Washington, DC market and, in this matter, would have been billed to Plaintiffs if they had been paying fees.

A summary of the litigation expenses is contained in Plaintiffs' Exhibit 8 and described in narrative form in the Sanchez Declaration (Pl. Ex. 2, para. 27). The documentation for the expenses is not attached. If the Court or a member of the Plaintiff class wishes to examine the documentation, we will promptly provide it.

CONCLUSION

Plaintiffs' litigation costs, including attorneys' fees, for the second quarter of 2024 are as follows:

Attorneys' Fees of Terris, Pravlik & Millian, LLP	\$159,062.50
Attorneys' Fees of Co-counsel NHcLP	\$3,121.30
Expenses	\$500.45
TOTAL	<u>\$162,684.25</u>

The total amount requested in this fees motion is \$162,684.32. However, the Parties have agreed to settle Plaintiffs' fees and expenses for \$138,281.61. A proposed order is attached.

After a period of at least 30 days of notice to the Plaintiff class of this fees request, Plaintiffs will make a filing to inform the Court that it may enter the Order awarding fees and expenses in the amount of \$138,281.61.

Respectfully submitted,

/s/ Zenia Sanchez Fuentes

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(919) 968-6308

Counsel for Plaintiffs

March 27, 2025

LIST OF EXHIBITS

Number	Description
1	Excerpt of Fees Provisions from “Order Modifying the Amended Remedial Order of May 6, 1997 and Vacating the Order of March 27, 1997” (“Settlement Order”), January 25, 1999, ECF 663, and Consent Order Modifying Paragraph 67 of the “Order Modifying the Amended Remedial Order of May 6, 1997 and Vacating the Order of March 27, 1997” (ECF 663), March 19, 2013, ECF 1801
2	Declaration of Zenia Sanchez Fuentes
3	U.S. Department of Commerce, Bureau of Labor Statistics, Legal Services Component of the Consumer Price Index Updated to 2024
4	Settlement Order Paragraph 64 and 65 Rates Updated to 2024
5	<i>Laffey</i> Matrix Updated by the Legal Services Component of the Consumer Price Index through May 31, 2024
6	Time Records for Second Quarter of 2024 (April 1, 2024 through June 30, 2024)
7	Summary of Time Records for Second Quarter of 2024 (April 1, 2024 through June 30, 2024)
8	Summary of Expense Records for Second Quarter of 2024 (April 1, 2024 through June 30, 2024)
9	Time Records of Jane Perkins for Second Quarter of 2024 (April 1, 2024 through June 30, 2024)
10	Declaration of Jane Perkins
11	Resumes of Terris, Pravlik & Millian, LLP, Attorneys

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Defendants.

Civil Action No. 93-452 (GK)

FILED

JAN 25 1998

NANCY MAYER-WHITTINGTON, CLERK
U.S. DISTRICT COURT

ORDER MODIFYING THE AMENDED REMEDIAL ORDER OF MAY 6, 1997
AND VACATING THE ORDER OF MARCH 27, 1997

WHEREAS, the parties desire to resolve the pending appeals in
this case,

WHEREAS, upon consideration of Plaintiffs' motion for entry of
this Order Modifying the Amended Remedial Order of May 6, 1997, and
Vacating the Order of March 27, 1997 (hereafter "Order"), and
Defendants' response agreeing to the motion, the Court concludes
that the modifications to the Amended Remedial Order of May 6,
1997, and the vacation of the Order of March 27, 1997, set forth
herein are fair, reasonable and adequate,

IT IS, this 22nd day of January, 1998,
ORDERED, ADJUDGED AND DECREED AS FOLLOWS:

1. The Amended Remedial Order of May 6, 1997, and the Order
of March 27, 1997, are vacated.

I. Monitor

2. Thomas W. Chapman, M.P.H., FACHE, served as Monitor
pursuant to Orders of the Court from March 10, 1997, to June 16,
1998. The parties understand that the Court is in the process of

SPINDLE # 42

ITEM # 667

663

RECEIVED
JAN 27 1998
Plaintiffs' Exhibit
1
Civ. No. 93-452 (TSC)
EXCERPT

of-pocket medical expenses that, but for Defendants' error, should have been paid by Medicaid.

62. Defendants shall provide corrective payments to Medicaid recipients who have incurred out-of-pocket medical expenses that should have been paid by Medicaid to all current and future Medicaid recipients and all those who were Medicaid recipients or were eligible for Medicaid at any time since March 2, 1990. Reimbursement of class members shall be made when the class member presents reasonable and reliable documentation or other evidence of their out-of-pocket expenses.

63. In an Order dated September 15, 1997, after considering the Monitor's report and the positions of the parties, the Court issued a Reimbursement Procedures Order setting forth the procedures for reimbursing Medicaid recipients for out-of-pocket expenses incurred since March 2, 1990. In an Order Partially Modifying the Reimbursement Procedures of the Amended Remedial Order of May 6, 1997, and the Reimbursement Procedures Order of September 15, 1997, entered on July 30, 1998, the Court set forth further procedures concerning reimbursement.

VIII. Monitoring Fees to Plaintiffs' Counsel

64. Plaintiffs' counsel may respond to all calls which come to their office and make reasonable inquiry to determine whether the caller is a member of the plaintiff class. If the caller is a member of the plaintiff class, Plaintiffs' counsel may provide the caller with legal assistance. The reasonable time and expenses of Plaintiffs' counsel in making such inquiry and providing such legal

assistance shall be deemed compensable monitoring of this Order under 42 U.S.C. § 1988 and applicable law interpreting that statutory provision. The hourly rate for handling the claims of individual class members shall be \$75/hour, regardless of the experience level of the lawyer who performs the work. This hourly rate shall be adjusted annually, beginning on January 1, 1999, based on the U.S. Department of Commerce Consumer Price Index for Legal Services.

65. Other reasonable attorney time by Plaintiffs' counsel in monitoring Defendants' compliance with this Order shall be compensated at the rate of \$315/hour for the time of Bruce J. Terris and Lynn Cunningham, and \$265/hour for the time of Kathleen L. Millian and Jane Perkins. Reasonable paralegal time shall be compensated at the rate of \$75/hour. If attorneys other than those mentioned specifically in this paragraph perform monitoring work, the parties shall use their best efforts to agree to an hourly rate for the attorney, which shall not exceed \$200/hour. These hourly rates shall be adjusted annually, beginning on January 1, 1999, based on the U.S. Department of Commerce Consumer Price Index for Legal Services.

66. The rates set forth in paragraphs 64 and 65 above for Plaintiffs' monitoring of Defendants' compliance with this Order were based on compromise and the parties do not intend these rates to apply for any purpose other than those set forth in paragraphs 64 and 65. Defendants take the position that the reasonable rates for Plaintiffs' counsel are lower than those set forth in

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**CONSENT ORDER MODIFYING PARAGRAPH 67 OF THE "ORDER MODIFYING
THE AMENDED REMEDIAL ORDER OF MAY 6, 1997 AND VACATING
THE ORDER OF MARCH 27, 1997" (ECF NO. 663)**

WHEREAS, the parties have conferred regarding a more efficient manner in which to address plaintiffs' on-going requests for attorneys' fees and expenses and agreed to modifications to paragraph 67 of the Order Modifying the Amended Remedial Order of May 6, 1997 and Vacating the Order of March 27, 1997 ("Settlement Order"), January 25, 1999, ECF No. 663;

NOW, THEREFORE, IT IS AGREED AS FOLLOWS:

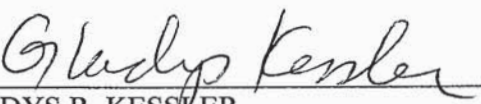
Paragraph 67 of the Settlement Order (ECF No. 663) is deleted and replaced with the following:

67. Plaintiffs' applications for fees and expenses shall cover, beginning for the first quarter of 2013, quarterly periods. Plaintiffs shall submit to Defendants their applications for fees and expenses within 90 days of the end of each calendar quarter. Plaintiffs shall submit to Defendants their fees and expenses for 2012 within 120 days of entry of this Order. Plaintiffs shall also submit to Defendants any application for fees and expenses previously held in abeyance within 120 days of the date that the fees

and expenses have become ripe for collection. Defendants shall respond to each application of plaintiffs by making a settlement proposal for a sum certain as to the fees and expenses at issue, or by informing plaintiffs that no settlement proposal will be made, within 45 days of submission of the application, or, in the case of the 2012 fees application, within 60 days of submission of that application. Plaintiffs may seek from the Court an extension of time to submit to Defendants any of the fee applications contemplated by this paragraph. Defendants may seek from the Court an extension of time to provide a response to Plaintiffs to any of the fee applications contemplated by this paragraph. If the parties cannot agree on the amount of fees and expenses in an application, Plaintiffs may make a motion to the Court 55 days after submission of the fees application to Defendants or, in the case of the 2012 fees application, within 70 days after submission of that application.

67A. Plaintiffs may move the Court at any time for their fees and expenses for 2011.

IT IS SO ORDERED THIS 18th DAY OF March, 2013.


GLADYS R. KESSLER
UNITED STATES DISTRICT JUDGE

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DECLARATION OF ZENIA SANCHEZ FUENTES

1. I am a partner in the Washington, DC, law firm Terris, Pravlik & Millian, LLP (hereafter “Terris, Pravlik & Millian” or “TPM”). The firm has served as lead counsel for the Plaintiff class in this action since the case was first investigated in 1992.

2. This declaration is filed in support of our motion for attorneys’ fees for the second quarter of 2024, which encompasses the three-month period from April 1, 2024, through June 30, 2024. The parties have settled this request for attorneys’ fees. Plaintiffs file this motion pursuant to the procedures agreed to in the Order of July 19, 2004 (ECF No. 1029), to satisfy Rule 23(h)(1) of the Federal Rules of Civil Procedure.

3. Our firm was founded in 1970 by the late Bruce J. Terris and engages exclusively in litigation areas that have come to be identified as public interest law. The firm’s litigation is in the areas of poverty, civil rights, and environmental law.

4. The cases that Terris, Pravlik & Millian handles are in areas of the law where people traditionally have not been represented. The firm’s work is done without charge to the client based on the hope that the client will prevail and attorneys’ fees will be awarded by the court or will be

received in settlement. The firm, therefore, does not have billing rates that reflect the value of its attorneys' services in the marketplace. *See SPIRG v. AT&T Bell Laboratories*, 842 F.2d 1436, 1442 (3d Cir. 1988); *see also Salazar v. District of Columbia*, 809 F. 3d 58, 64-65 (D.C. Cir. 2015)(in affirming fee awards based on prevailing market rates from the LSI *Laffey* Matrix, the court of appeals necessarily determined that TPM does not have rates that reflect the value of its services in the marketplace); and *DL v. District of Columbia*, 924 F.3d 585 (D.C. Cir. 2019)(in reversing the fee award based on the USAO matrix, the court of appeals necessarily recognized that TPM does not have rates that reflect the value of its services in the marketplace).

5. I graduated from the George Washington University Law School in 2005, where I participated in the Public Justice Advocacy Clinic and was a law clerk at the District of Columbia Public Defender Service. I joined TPM in 2005 and became a partner in 2013. In the last 19 years, I have successfully litigated complex civil rights cases in the federal courts. For the work encompassed in this fee petition, I have supervised the case with Kathleen L. Millian.

6. The attorney time sought in this fee request—from April 1, 2024, through June 30, 2024—was expended by Alicia C. Alcorn, Jaclyn Deitch, Todd A. Gluckman, Michael L. Huang, Kathleen L. Millian, and myself. Resumes for the lawyers for whom we seek fees are attached as Plaintiffs' Exhibit 11.

(a) Alicia Clark Alcorn (ACA) graduated from George Mason University School of Law in May 2004, where she served as an officer with the Association for Public Interest Law chapter. Ms. Alcorn worked as a legal assistant with TPM for four years before joining the firm as an attorney in 2004; she became a partner in 2012.

(b) Jaclyn A. Deitch (JAD) graduated from Fordham University in 2023, where she was a member of Moot Court, served on the Executive Board of the Fordham Chapter of

Lawyering for Reproductive Justice, and was a recipient of the Archibald R. Murray Public Service Award for completing over 1,000 hours of pro bono and community service work during law school. Ms. Deitch holds a Master of Public Health from Columbia University. She joined TPM as an associate in January 2024.

(c) Todd A. Gluckman (TAG) graduated from Cornell Law School in 2005. Before joining the firm in 2011, Mr. Gluckman was a clerk to the Honorable Frederick J. Martone of the United States District Court for the District of Arizona and an associate at White & Case LLP. He became a partner at TPM in 2015.

(d) Michael L. Huang (MLH) graduated from the Georgetown University Law Center in 2007, where he served as Notes Editor for the Georgetown Law Journal. Before joining the firm in 2012, Mr. Huang was an associate counsel to the State & Local Legal Center and a clerk to the Honorable Erik P. Christian of the Superior Court of the District of Columbia. He became a partner in 2019.

(e) Kathleen L. Millian (KLM) graduated from Stanford Law School in 1985. Before beginning employment with Terris, Pravlik & Millian, Ms. Millian was a judicial clerk to the Honorable James K. Singleton of the Alaska Court of Appeals from 1985 to 1986. Ms. Millian joined the firm in 1987 and became a partner in 1992.

7. The firm's paralegals who worked on this case for the time period covered in this application were: Anisa I. Noor (AIN), Adam T. Harrington (ATH), and D. Alexis Pantoja (DAP).

8. In identifying the time for which we seek compensation, we have exercised billing judgment. We are seeking compensation only for time that we would have billed to paying clients. Indeed, in several instances, we are not seeking compensation for time that we would have billed to paying clients.

9. In the exercise of billing judgment concerning the attorneys' fees and expenses encompassed in this fee petition, Plaintiffs eliminated significant fees.

10. All the work for which Plaintiffs seek payment in this application involves the monitoring of the Settlement Order, including individual class members' issues, work that resulted directly from the monitoring of the Settlement Order (*e.g.*, attorneys' fees applications), and engaging in settlement discussions with Defendants concerning a strategy to exit the Settlement Order and terminate the case. Therefore, all the time included in this application was reasonably expended by Plaintiffs' counsel in the representation of the Plaintiff class.

11. For the second quarter of 2024, we have divided the time spent in this case by attorneys and paralegals into clients, categories, and subcategories. The lodestar amounts, *i.e.*, the number of hours of work for each attorney and paralegal in each subcategory multiplied by the rates, are set forth in summary tables. *See* Pl. Ex. 7.

12. Computer printouts of Plaintiffs' contemporaneous time records setting forth the work performed for the second quarter are attached as Plaintiffs' Exhibit 6. The time records in Plaintiffs' Exhibit 6 are organized by the same matters, categories, and subcategories as in the summary in Plaintiffs' Exhibit 7.

13. Work Monitoring Defendants' Compliance with the Settlement Order. During the second quarter of 2024, Plaintiffs' counsel reviewed and analyzed data from the District's Fiscal Year 2023 CMS Form 416; reviewed and commented on the Managed Care Plan (MCP) FY 2024 Corrective Action Plans (CAPs) concerning the annual participant ratio; communicated with the District regarding compliance with its obligations pursuant to paragraph 48 to provide explanation for failure to meet required participant ratio; attended DC Medical Care Advisory Committee meetings; reviewed the District's 2023 External Quality Review Organization, Annual Technical

Report of the MCPs' performance, including childhood performance metrics; appealed the denial by the DHCF of a FOIA request response concerning feedback on the Draft Managed Care Quality Plan for 2024-2027 from the Centers for Medicare and Medicaid Services (CMS), to the Mayor's Office of Legal Counsel; monitored District of Columbia legislation affecting the provision of EPSDT services to the Plaintiff class and Defendants' compliance with the Settlement Order; drafted a letter to HSCSN regarding transportation issues affecting class members with special needs; developed settlement offers, engaged in mediation with Defendants concerning a strategy to exit the Settlement Order and terminate the case, and provided status updates to the Court concerning these settlement discussions.

14. In *Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 10-11 (D.D.C. 2000), this Court held that the below market rates in the Settlement Order do not apply to the "fees sought for the work of Plaintiffs' counsel on . . . settlement." Nonetheless, in the interest of advancing the current exit strategy settlement discussions, Plaintiffs are seeking only the Settlement Order rates for their counsel's settlement work.

15. Work on Individual Medicaid Claims. Work on individual claims involved assisting families of Medicaid-eligible children under 21 who experienced a denial, reduction, or termination of services or eligibility or had difficulty obtaining medical services, and assisting individuals with claims for reimbursement by the District of Columbia for medical expenses that should have been covered by Medicaid, consistent with the Court's Order and Memorandum Opinion of May 18, 2015 (ECF 2045, 2046).

16. The issues presented by individual class members can be very time consuming. Frequently, our clients do not keep the kinds of detailed records necessary to satisfy an MCP or government agency, and we must obtain records and information for them. Moreover, some of our

clients have difficulty in obtaining adequate and timely EPSDT services for their children who have complex special needs involving numerous medical professionals and service providers. Assisting these clients with obtaining timely services and, at times, reimbursement for out-of-pocket expenses that DC Medicaid should have covered, can be time-consuming because we often must coordinate among providers, the MCP, and the family to resolve issues through negotiation. When necessary, we bring formal appeals, submit grievances, and/or file fair hearing requests before the District of Columbia Office of Administrative Hearings. The most time-intensive cases involve children and adolescents with severe behavioral, emotional, and intellectual disabilities in need of prompt, medically necessary services.

17. Pursuant to paragraph 64 of the Settlement Order, Plaintiffs provided brief assistance of no more than 15 minutes to individuals who contacted our law firm to request legal assistance and were ultimately determined not to be members of the Plaintiff class. If additional assistance was provided, it was not billed to Defendants.

18. Work on Attorneys' Fees Matters Not Subject to the Agreed Rates in the Settlement Order. For the second quarter of 2024, non-monitoring work included the following attorneys' fees work: the preparation and submission of Plaintiffs' application for fees to the court for the third quarter of 2023, the preparation and submission of a fees request for settlement of the first quarter of 2024, and negotiations of Plaintiffs' fee request for the fourth quarter of 2023.

19. Agreed Rates Set Forth in the Settlement Order. Plaintiffs have updated the rates set forth in paragraphs 64 and 65 of the Settlement Order for the work of Plaintiffs' counsel relating to monitoring Defendants' compliance with the Settlement Order and providing legal assistance to members of the Plaintiff class. The Legal Services Consumer Price Index (LSI), produced by the Bureau of Labor Statistics of the United States Department of Labor in January of each year

starting with 1999, was divided by the LSI for the preceding January. *See* Pl. Ex. 3, p. 1. This results in the adjustment factor. The rates from the preceding year are multiplied by the adjustment factor to calculate the next year's rates. For example, the LSI for January 1999 (175.7) is divided by the LSI for January 1998 (168.6). The result (1.0421115) is the adjustment factor for updating rates from January 1, 1998, to January 1, 1999. Each rate in the January 1, 1998, year is multiplied by the adjustment factor to produce the rate for that experience level for the next year. For example, multiplication of the 1998 paralegal rate (\$75) by the adjustment factor (1.0421115) gives the 1999 rate of \$78. The updated hourly rate applicable to paralegals for the work in 2024 is \$196. The updated rates for 1998 through 2024 for lawyers and paralegals are set forth in Plaintiffs' Exhibit 4.¹

20. Under paragraph 64 of the Settlement Order, the paralegal rate applies to all work on individual claims whether done by attorneys, law clerks, or paralegals.

21. Market Rates for Non-Monitoring Work. For the work not subject to the agreed Settlement Order rates (*i.e.*, the work on attorneys' fees matters), Plaintiffs request hourly rates under the *Laffey* matrix for 2023-2024 for attorneys and paralegals with Terris, Pravlik & Millian. The *Laffey* matrix is based on a fee schedule for the District of Columbia, which has been accepted by this Court and the Court of Appeals for the District of Columbia Circuit. This fee schedule is called the "*Laffey* matrix" because it was first accepted by this Court in *Laffey v. Northwest Airlines, Inc.*, 572 F. Supp. 354, 371-375 (D.D.C. 1983), affirmed, 746 F.2d 4 (D.C. Cir. 1984),

¹ Typically, Plaintiffs obtain monthly LSI data from January of each year and divide it by the LSI for the preceding January. However, the Bureau of Labor Statistics of the United States Department of Labor did not issue the legal services component of the Consumer Price Index for January 2024 but did for March 2024. Therefore, the 2024 Adjustment Factor was calculated by using the LSI for March 2023 and March 2024.

overruled in part on other grounds, *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988)(*en banc*). The rates in the *Laffey* matrix were updated by the parties in *Save Our Cumberland Mountains v. Hodel*, *supra*, 857 F.2d at 1525, through May 31, 1989. *Covington v. District of Columbia*, 839 F. Supp. 894, 898, 904, n.9 (D.D.C. 1993), affirmed, 57 F.3d 1101 (D.C. Cir. 1995), certiorari denied, 516 U.S. 1115 (1996); *Trout v. Ball*, 705 F. Supp. 707, 709, n.10 (D.D.C. 1989). This fee schedule was accepted by this Court as applicable to the work of Plaintiffs' counsel in this case (*Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 15 (D.D.C. 2000), *Salazar v. District of Columbia*, 991 F. Supp. 2d 39, 47 (D.D.C. 2014), and *Salazar v. District of Columbia*, 30 F. Supp. 3d 47, 51-52 (D.D.C. 2014)) and was affirmed by the Court of Appeals for the District of Columbia Circuit. *Salazar v. District of Columbia*, *supra*, 809 F.3d at 63-65.

22. To obtain hourly rates for the work not subject to the agreed Settlement Order rates, Plaintiffs applied the following methodology. First, Plaintiffs obtained monthly data for from the LSI. Pl. Ex. 3. Second, Plaintiffs applied the LSI to the updated *Laffey* matrix rates for each experience level in order to produce a current hourly rate for each experience level.² These calculations are set forth in Plaintiffs' Exhibit 5.³

² Specifically, the LSI for June of each year, starting with 1989, was divided by the LSI for the preceding June. This results in the adjustment factor. The matrix rates from the preceding year were multiplied by the adjustment factor to get the next year's rates. For example, the LSI for June 1989 (114.6) was divided by the LSI for June 1988 (107.1). The result (1.070028) was the adjustment factor for updating rates from the year from June 1, 1988, to May 31, 1989, to the year from June 1, 1989, to May 31, 1990. Each rate in the June 1, 1988, to May 31, 1989, year was multiplied by the adjustment factor to produce the rate for that experience level for the next year. For example, multiplication of the 20+ experience level rate (\$265) for the period from June 1, 1988, to May 31, 1989, by the adjustment factor (1.070028) gave the rate of \$284 for the next year.

³ Each year until 2022, Plaintiffs obtained monthly LSI data from June of each year and divided it by the LSI for the preceding June. However, the Bureau of Labor Statistics of the United States Department of Labor did not issue the legal services component of the Consumer Price Index for June 2022 or June 2023. Therefore, the average of the May and July legal services components

23. Under this methodology, the *Laffey* rates applicable during the second half of 2023 and first half of 2024 are:

Years out of Law School	6/1/2023-5/31/2024
20+	\$1,057
11-19	\$878
8-10	\$777
4-7	\$538
1-3	\$437
Paralegal	\$239

24. Based on information available to me, the LSI *Laffey* Matrix rates are below the current market rates for complex federal litigation in Washington, DC.

25. Our firm bills paralegal time on its cases in the same manner as attorneys' time. As a result, we have included paralegal time in the lodestar calculations. *See Missouri v. Jenkins*, 491 U.S. 274, 284-88 (1989).

26. In our application, we have also requested reimbursement for the expenses that we incurred. These are expenses that we would bill to paying clients and that law firms typically charge their clients. We have not attached the back-up documentation for our expenses because Defendants' counsel has previously informed us that they do not want us to produce the back-up documentation for the expenses relating to fees applications. Plaintiffs request a total of \$500.45 in out-of-pocket litigation expenses incurred in the time period covered in this application. *See* Pl. Ex. 8.

27. For the time period covered in this application, we divided the expenses into categories, shown in Plaintiffs' Exhibit 8. I describe below the expenses included in each of the following categories:

was used to calculate the 2022 and 2023 Adjustment Factors. The 2023 Adjustment Factor was calculated by dividing the average of May and July for 2023 by the average of May and July for 2022.

(a) Document Production B&W. This category includes the cost of black and white printing, photocopying, scanning, and faxing of documents in connection with the case. Our firm charges 15 cents per page for these types of document production.

(b) Lexis/Westlaw. This category includes the cost of Westlaw for legal research. These expenses are charged at cost.

(c) Postage. This category includes postage and delivery costs for correspondence with class members.

28. For work done for the second quarter of 2024, with the billing reductions explained above, Plaintiffs incurred attorneys' fees of \$159,062.50 for Terris, Pravlik & Millian, attorneys' fees for co-counsel National Health Law Program of \$3,121.30, and out-of-pocket expenses of \$500.45, for a total of \$162,684.25. *See* Pl. Exs. 6-9. Plaintiffs are entitled to these fees and expenses. However, in the interest of avoiding litigation, Plaintiffs have agreed to settle the fees and expenses for \$138,281.61.

29. All the work set forth in this fee petition for TPM was reasonably expended by my firm in our representation of the Plaintiff class and is directly related to the Settlement Order in the case. The records will enable me, if necessary, to supplement the description of any of the work or expense categories contained in the time and expense reports. Thus, if the Court requests, I would be pleased to supplement this declaration or to discuss any category in more detail, including the nature of the work or expense and the amount of time expended or expenses incurred.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on March 27, 2025.

/s/ Zenia Sanchez Fuentes

ZENIA SANCHEZ FUENTES



Databases, Tables & Calculators by Subject

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Data extracted on: November 13, 2024 (5:51:59 PM)

Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUUR0000SEGD01,CUUS0000SEGD01
Not Seasonally Adjusted
Series Title: Legal services in U.S. city average, all urban consumers, not seasonally adjusted
Area: U.S. city average
Item: Legal services
Base Period: DECEMBER 1986=100

Download: [xlsx](#)

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	HALF1	HALF2
2014	315.758	317.364	318.334	318.769	317.820	318.963	318.925	319.115	319.095	319.485	319.485	318.795		
2015	319.390	319.613	320.198	321.015	321.825	321.793	323.086	324.413	327.485	327.557	328.393	327.925		
2016	326.621	326.680	326.714	327.114	331.779	333.681	339.140	339.054	340.760	340.873	339.966	341.357		
2017	348.052	345.769	345.706	345.865	344.984	349.127	348.267	346.046	345.431	345.577	346.003	345.870		
2018	349.586	358.637	360.741	360.832	361.374	361.374	360.971	360.971	361.248	363.273	368.049	367.877	358.757	363.732
2019	363.948	367.054	367.076	362.839	362.964	363.152	365.428	365.428	365.193	365.193	364.384	364.384	364.506	365.002
2020	367.022	369.233	369.233	367.647	367.911	368.924	368.854	369.220	369.317	369.071	369.112	369.112	368.328	369.114
2021	369.417	371.052	371.083	371.157	371.157	371.157	371.157	371.130	377.635	384.455	380.812	382.358	370.837	377.925
2022	381.584	389.250	390.992	395.288	399.211		406.267	405.729	405.729	405.325	404.330	405.211	393.450	405.432
2023	405.211	409.390	410.273		428.416		424.823		456.146				417.374	
2024			446.314						457.042					

U.S. BUREAU OF LABOR STATISTICS Postal Square Building 2 Massachusetts Avenue NE Washington, DC 20212-0001

Telephone:1-202-691-5200_ Telecommunications Relay Service:7-1-1_ [www.bls.gov](#) [Contact Us](#)

Settlement Order Paragraph 64 and 65 Rates Updated to 2024

Attorney	1998 Settlement Order Rate	1/1/1999 Updated Rate	1/1/2000 Updated Rate	1/2/2001 Updated Rate	1/1/2002 Updated Rate	1/1/2003 Updated Rate	1/1/2004 Updated Rate	1/1/2005 Updated Rate	1/1/2006 Updated Rate
Terris Cunningham	\$315	\$328	\$345	\$361	\$387	\$404	\$423	\$446	\$460
Millian Perkins	\$265	\$276	\$290	\$303	\$325	\$340	\$356	\$375	\$387
Maximum Rate for Other Attorneys	\$200	\$208	\$219	\$229	\$246	\$258	\$269	\$283	\$292
Law Clerk/ Paralegal/ Individual Claims	\$75	\$78	\$82	\$86	\$92	\$96	\$101	\$106	\$109
Adjustment Factor ¹	1.0421115	1.0523619	1.0459707	1.0703205	1.0439613	1.0481258	1.0529801	1.0314465	1.0400842

¹ The Adjustment Factor refers to the Legal Services component of the Consumer Price Index-All Urban Consumers produced by the Bureau of Labor Statistics of the U.S. Department of Labor. See Pl. Ex. 3.

Attorney	1/1/2007 Updated Rate	1/1/2008 Updated Rate	1/1/2009 Updated Rate	1/1/2010 Updated Rate	1/1/2011 Updated Rate	1/1/2012 Updated Rate	1/1/2013 Updated Rate	1/1/2014 Updated Rate
Terris Cunningham	\$478	\$497	\$515	\$532	\$551	\$562	\$572	\$590
Millian Perkins	\$402	\$418	\$434	\$448	\$464	\$473	\$481	\$496
Maximum Rate for Other Attorneys	\$304	\$316	\$327	\$338	\$350	\$357	\$363	\$375
Law Clerk/ Paralegal/ Individual Claims	\$114	\$118	\$123	\$127	\$131	\$134	\$136	\$140
Adjustment Factor ²	1.0400842	1.0360489	1.0331595	1.0351307	1.0204695	1.0172384	1.0312082	1.0115025

² The Adjustment Factor refers to the Legal Services component of the Consumer Price Index-All Urban Consumers produced by the Bureau of Labor Statistics of the U.S. Department of Labor. See Pl. Ex. 3.

Attorney	1/1/2015 Updated Rate	1/1/2016 Updated Rate	1/1/2017 Updated Rate	1/1/2018 Updated Rate	1/1/2019 Updated Rate	1/1/2020 Updated Rate	1/1/2021 Updated Rate	1/1/2022 Updated Rate
Terris Cunningham	\$597	\$610	\$650	\$653	\$680	\$686	\$690	\$713
Millian Perkins	\$502	\$513	\$547	\$549	\$572	\$577	\$581	\$600
Maximum Rate for Other Attorneys	\$379	\$387	\$413	\$415	\$432	\$435	\$438	\$453
Law Clerk/ Paralegal/ Individual Claims	\$142	\$145	\$155	\$156	\$162	\$163	\$164	\$170
Adjustment Factor ³	1.0226400	1.0656143	1.0044074	1.041083	1.0084463	1.006525	1.032936	1.061918

³ The Adjustment Factor refers to the Legal Services component of the Consumer Price Index-All Urban Consumers produced by the Bureau of Labor Statistics of the U.S. Department of Labor. See Pl. Ex. 3.

Attorney	1/1/2023 Updated Rate	1/1/2024 Updated Rate
Terris Cunningham	\$757	\$824
Millian Perkins	\$637	\$693
Maximum Rate for Other Attorneys	\$481	\$523
Law Clerk/ Paralegal/ Individual Claims	\$180	\$196
Adjustment Factor ⁴	1.0870846	

⁴ Typically, Plaintiffs obtain monthly LSI data from January of each year and divide it by the LSI for the preceding January. However, the Bureau of Labor Statistics of the United States Department of Labor did not issue the legal services component of the Consumer Price Index for January 2024 but did for March 2024. Therefore, the 2024 Adjustment Factor was calculated by using the LSI for March 2023 and March 2024.

Adjustments to the 1988-1989 *Laffey* Matrix Rates Using the Legal Services Index¹

Plaintiffs' Exhibit
5
 Civ. No. 93-452 (TSC)

<i>Years Out of Law School</i>	<i>06/01/88-05/31/89</i> ²	<i>06/01/89-05/31/90</i>	<i>06/01/90-05/31/91</i>	<i>06/01/91-05/31/92</i>	<i>06/01/92-05/31/93</i>	<i>06/01/93-05/31/94</i>	<i>06/01/94-05/31/95</i>	<i>06/01/95-05/31/96</i>	<i>06/01/96-05/31/97</i>	<i>06/01/97-05/31/98</i>
20th+	\$265	\$284	\$306	\$320	\$336	\$355	\$363	\$375	\$389	\$406
11th - 19th	\$220	\$235	\$254	\$265	\$279	\$294	\$301	\$311	\$323	\$337
8th - 10th	\$195	\$209	\$225	\$235	\$247	\$261	\$267	\$276	\$287	\$299
4th - 7th	\$135	\$144	\$156	\$163	\$171	\$181	\$185	\$191	\$198	\$207
1st - 3rd	\$110	\$118	\$127	\$133	\$139	\$147	\$151	\$155	\$162	\$168
Paralegal/Law Clerk	\$60	\$64	\$69	\$72	\$76	\$80	\$82	\$85	\$88	\$92
Adjustment Factor ³		1.070028	1.079406	1.044462	1.051083	1.055228	1.023726	1.032038	1.039630	1.041931

¹ *Laffey* refers to *Laffey v. Northwest Airlines*, 572 F. Supp. 354 (D.D.C. 1983), affirmed in part and reversed in part on other grounds, 746 F.2d 4 (D.C. Cir. 1984), overruled in part on other grounds, *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988)(en banc).

² The rates in this column represent the 1989 update to the *Laffey* matrix rates for Washington, D.C. See *Covington v. District of Columbia*, 839 F. Supp. 894, 904 (D.D.C. 1993).

³ The Adjustment Factor refers to the legal services component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor. The Adjustment Factor is calculated by dividing the legal services component for June of the current year by the component for June of the previous year.

<i>Years Out of Law School</i>	<i>06/01/97-05/31/98⁴</i>	<i>06/01/98-05/31/99</i>	<i>06/01/99-05/31/00</i>	<i>06/01/00-05/31/01</i>	<i>06/01/01-05/31/02</i>	<i>06/01/02-05/31/03</i>	<i>06/01/03-05/31/04</i>	<i>06/01/04-05/31/05</i>	<i>06/01/05-05/31/06</i>	<i>06/01/06-05/31/07</i>
20th+	\$406	\$424	\$445	\$468	\$487	\$523	\$549	\$574	\$599	\$614
11th - 19th	\$337	\$352	\$369	\$389	\$404	\$434	\$456	\$477	\$497	\$510
8th - 10th	\$299	\$312	\$327	\$345	\$359	\$385	\$404	\$423	\$441	\$452
4th - 7th	\$207	\$216	\$227	\$239	\$248	\$266	\$280	\$293	\$305	\$313
1st - 3rd	\$168	\$175	\$184	\$194	\$202	\$216	\$227	\$238	\$248	\$254
Paralegal/Law Clerk	\$92	\$96	\$101	\$106	\$110	\$118	\$124	\$130	\$136	\$139
Adjustment Factor ³		1.043902	1.049065	1.052895	1.040719	1.072663	1.050687	1.045537	1.042691	1.025641

⁴Column repeated from previous page.

<i>Years Out of Law School</i>	<i>06/01/06-05/31/07⁵</i>	<i>06/01/07-05/31/08</i>	<i>06/01/08-05/31/09</i>	<i>06/01/09-05/31/10</i>	<i>06/01/10-05/31/11</i>	<i>06/01/11-05/31/12</i>	<i>06/01/12-05/31/13</i>	<i>06/01/13-05/31/14</i>	<i>06/01/14-05/31/15</i>	<i>06/01/15-05/31/16</i>
20th+	\$614	\$646	\$672	\$686	\$709	\$734	\$753	\$772	\$790	\$797
11th - 19th	\$510	\$536	\$558	\$570	\$589	\$610	\$626	\$641	\$656	\$662
8th - 10th	\$452	\$475	\$494	\$505	\$522	\$541	\$554	\$568	\$581	\$586
4th - 7th	\$313	\$329	\$342	\$350	\$362	\$374	\$384	\$393	\$403	\$406
1st - 3rd	\$254	\$267	\$278	\$284	\$293	\$304	\$312	\$319	\$327	\$330
Paralegal/Law Clerk	\$139	\$146	\$152	\$155	\$161	\$166	\$171	\$175	\$179	\$180
Adjustment Factor ³		1.051500	1.040127	1.021848	1.033724	1.035168	1.025790	1.024383	1.023459	1.008873

⁵Column repeated from previous page.

<i>Years Out of Law School</i>	<i>06/01/15-05/31/16⁶</i>	<i>06/01/16-05/31/17</i>	<i>06/01/17-05/31/18</i>	<i>06/01/18-05/31/19</i>	<i>06/01/19-05/31/20</i>	<i>06/01/20-05/31/21</i>	<i>06/01/21-05/31/22</i>	<i>06/01/22-05/31/23⁷</i>	<i>06/01/23-05/31/24⁸</i>	<i>06/01/24-05/31/25</i>
20th+	\$797	\$826	\$865	\$895	\$899	\$914	\$919	\$997	\$1,057	\$0
11th - 19th	\$662	\$686	\$718	\$743	\$747	\$759	\$764	\$829	\$878	\$0
8th - 10th	\$586	\$608	\$636	\$658	\$661	\$672	\$676	\$733	\$777	\$0
4th - 7th	\$406	\$421	\$440	\$456	\$458	\$465	\$468	\$508	\$538	\$0
1st - 3rd	\$330	\$342	\$358	\$371	\$372	\$378	\$381	\$413	\$437	\$0
Paralegal/Law Clerk	\$180	\$187	\$195	\$202	\$203	\$206	\$208	\$225	\$239	\$0
Adjustment Factor ³		1.036943	1.046290	1.035079	1.004920	1.015894	1.006053	1.085091	1.059295	0.000000

⁶ Column repeated from previous page.

⁷ The Bureau of Labor Statistics of the United States Department of Labor did not issue the legal services component of the Consumer Price Index for June 2022. Therefore, the average of the May and July components was used to calculate the 2022 Adjustment Factor. As provided in footnote 3, the Adjustment Factor was calculated by dividing this average by the legal services component for June 2021, which is the same value as May and July 2021.

⁸ The Bureau of Labor Statistics of the United States Department of Labor did not issue the legal services component of the Consumer Price Index for June 2023. Therefore, the average of the May and July components was used to calculate the 2023 Adjustment Factor. As provided in footnote 3, the Adjustment Factor was calculated by dividing this average by the average of the legal services components for May and July 2022, since the Bureau of Labor Statistics of the United States Department of Labor also did not issue a legal services component of the Consumer Price Index for June 2022. *See* footnote 7.

Salazar v. District of Columbia
D.D.C., Civil Action No. 93-452 (TSC)

Terris, Pravlik & Millian, LLP

Time Records by Category

April 1, 2024 to June 30, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: AJ - DC Court of Appeals - 5056								
1	6/12/2024	ATH	0.516	\$196.00	\$101.14	EPSDT - Fair Hearing	Pl Supplemental Brief	Call to DC court of appeal re: transcript of oral arguments
2	6/21/2024	ATH	0.677	\$196.00	\$132.69	EPSDT - Fair Hearing	Pl Supplemental Brief	Call with parent re: timeline of services ABA
3	6/28/2024	ATH	0.145	\$196.00	\$28.42	EPSDT - Fair Hearing	Pl Supplemental Brief	Proof and cite check of declaration of parent in support of Petitioner's Supplemental Brief
4	5/9/2024	KLM	0.420	\$196.00	\$82.32	EPSDT - Fair Hearing	Scheduling Order	Read and think about court's order directing further briefing on mootness
5	6/12/2024	KLM	0.250	\$196.00	\$49.00	EPSDT - Fair Hearing	Def Supplemental Brief	Read and think about defendant's brief asserting mootness
6	6/12/2024	KLM	0.480	\$196.00	\$94.08	EPSDT - Fair Hearing	Pl Supplemental Brief	Confer with ZSF re strategy for response to defendant's brief asserting mootness
7	6/21/2024	KLM	0.130	\$196.00	\$25.48	EPSDT - Fair Hearing	Pl Supplemental Brief	Listen to portion of oral argument re DHCF counsel's position on mootness
8	6/21/2024	KLM	0.920	\$196.00	\$180.32	EPSDT - Fair Hearing	Pl Supplemental Brief	Confer with ZSF, HR, NFS re strategy for plaintiffs' response to DHCF brief on mootness
9	6/26/2024	KLM	3.898	\$196.00	\$764.01	EPSDT - Fair Hearing	Pl Supplemental Brief	Review and edit brief and [REDACTED] declaration
10	6/18/2024	NFS	2.127	\$196.00	\$416.89	EPSDT - Fair Hearing	Pl Supplemental Brief	Research mootness/vacatur issue and respond to ZSF
11	6/21/2024	NFS	0.170	\$196.00	\$33.32	EPSDT - Fair Hearing	Pl Supplemental Brief	Review relevant portion of argument transcript in preparation for meeting
12	6/21/2024	NFS	0.850	\$196.00	\$166.60	EPSDT - Fair Hearing	Pl Supplemental Brief	Call with ZSF/KLM/HR to discuss mootness briefing
13	5/9/2024	ZSF	0.151	\$196.00	\$29.60	EPSDT - Fair Hearing	Scheduling Order	Read Court of Appeals Order
14	5/16/2024	ZSF	0.280	\$196.00	\$54.88	EPSDT - Fair Hearing	Scheduling Order	Tel call w parent re court order
15	6/11/2024	ZSF	0.593	\$196.00	\$116.23	EPSDT - Fair Hearing	Def Supplemental Brief	Read DHCF supplemental filing

Matter: AJ - DC Court of Appeals - 5056

Monday, September 23, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
16	6/12/2024	ZSF	0.470	\$196.00	\$92.12	EPSDT - Fair Hearing	Pl Supplemental Brief	Confer w KLM re petitioner's supplemental brief
17	6/18/2024	ZSF	0.846	\$196.00	\$165.82	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft AJ's supplemental brief; instructions to HR re research
18	6/20/2024	ZSF	4.464	\$196.00	\$874.94	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft AJ's supplemental brief
19	6/21/2024	ZSF	0.850	\$196.00	\$166.60	EPSDT - Fair Hearing	Pl Supplemental Brief	Confer with KLM, NFS, and HR re response to District's supplemental brief
20	6/21/2024	ZSF	3.291	\$196.00	\$645.04	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft supplemental brief
21	6/22/2024	ZSF	6.788	\$196.00	\$1,330.45	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft supplemental brief
22	6/23/2024	ZSF	8.635	\$196.00	\$1,692.46	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft supplemental response brief
23	6/25/2024	ZSF	8.490	\$196.00	\$1,664.04	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft supplemental response brief
24	6/26/2024	ZSF	5.292	\$196.00	\$1,037.23	EPSDT - Fair Hearing	Pl Supplemental Brief	Research and draft supplemental response brief
25	6/28/2024	ZSF	0.878	\$196.00	\$172.09	EPSDT - Fair Hearing	Pl Supplemental Brief	Review KLM edits to supplemental response brief and declaration and revise same

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: AD, a minor								
26	5/22/2024	AIN	0.050	\$196.00	\$9.80	EPSDT		Review ZSF email re AD service questions and ask re passing off task
27	4/9/2024	ZSF	0.463	\$196.00	\$90.75	EPSDT		Review meeting notes and send follow up email to parent re status of outstanding services discussed last month
28	4/10/2024	ZSF	0.134	\$196.00	\$26.26	EPSDT		Review email to parent re status update on services pending and correspondence with HSCSN re care management needs
29	4/29/2024	ZSF	0.103	\$196.00	\$20.19	EPSDT		Confer with AIN re unresolved issues and outstanding services from HSCSN
30	5/6/2024	ZSF	0.649	\$196.00	\$127.20	EPSDT		Tel call with parent re needed behavioral health services (10 min.); read tel notes (12 min.); email to HSCSN requesting assistance to identify and arrange for psychiatric services (16 min.)
31	5/20/2024	ZSF	0.149	\$196.00	\$29.20	EPSDT		Assess ongoing needs not served by HSCSN and provide instructions to AIN to follow up with HSCSN re same

Matter: AD, a minor

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Matter: AD-MD, minors								
32	4/10/2024	AIN	0.155	\$196.00	\$30.38	EPSDT		Draft email to parent to schedule meeting re DDS issues and ISP documents
33	4/22/2024	AIN	0.175	\$196.00	\$34.30	EPSDT		Review emails/phone notes (5.5 min); call parent re ZSF questions (5 min)
34	4/29/2024	AIN	0.325	\$196.00	\$63.70	EPSDT		Tel call w/ parent re services (15.5 min); message ZSF re updates and parent question about phone notes (4 min)
35	5/3/2024	AIN	0.150	\$196.00	\$29.40	EPSDT		Call parent re status of Comprehensive and other services (2 min); draft and send email to parent re scheduling meeting same (7 min)
36	5/6/2024	AIN	0.320	\$196.00	\$62.72	EPSDT		Tel call w/ parent and ZSF re services update (15 min); discuss next steps w ZSF (3 min); draft and send email to J. Abilome re upcoming meeting w parent (1 min)
37	5/14/2024	AIN	0.092	\$196.00	\$18.03	EPSDT		Review phone notes (4.5 min); attempt to call Dr. Holder (1 min)
38	5/15/2024	AIN	0.500	\$196.00	\$98.00	EPSDT		Call parent re nursing hours (12 min); call Dr. Holder and leave message re increasing nursing/ABA hours (4.5 min); call Dr. Holder re same (13.5 min)
39	6/21/2024	AIN	0.583	\$196.00	\$114.27	EPSDT		T/c w parent re AD/MD updates (27 min); discuss new care manager issue w ZSF (8 min)
40	6/25/2024	AIN	0.050	\$196.00	\$9.80	EPSDT		Draft response to care manager

Matter: AD-MD, minors

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Matter: AJ, a minor								
41	4/4/2024	ATH	0.039	\$196.00	\$7.64	EPSDT		Documenting emails
42	4/5/2024	ATH	0.490	\$196.00	\$96.04	EPSDT		Tel call with parent, communication about HSCSN SCA with ZSF
43	4/11/2024	ATH	0.476	\$196.00	\$93.30	EPSDT		Call with parent re: services / system of payment
44	4/12/2024	ATH	0.564	\$196.00	\$110.54	EPSDT		Call from parent
45	4/19/2024	ATH	0.584	\$196.00	\$114.46	EPSDT		Call with parent re: assessment with home health provider, follow-up with ZSF
46	4/25/2024	ATH	0.178	\$196.00	\$34.89	EPSDT		Call to parent re: receiving services
47	4/26/2024	ATH	0.109	\$196.00	\$21.36	EPSDT		Call with parent re: services
48	5/3/2024	ATH	0.663	\$196.00	\$129.95	EPSDT		Two calls with parent re: PCA / Nursing status / reimbursement picture / Comprehensive care
49	5/17/2024	ATH	0.204	\$196.00	\$39.98	EPSDT		Call with parent re: aide and nursing at ABA
50	6/4/2024	ATH	0.080	\$196.00	\$15.68	EPSDT		Call with parent and updating phone notes (3 min), review phone notes and correspondence with HSCSN on case (10 min)
51	6/5/2024	ATH	1.270	\$196.00	\$248.92	EPSDT		Call with parent and updating phone notes (35 min), draft and send communication with HSCSN re: secondary insurance for medication (20 min), follow up with parent re emails from HSCSN and medication specifics
52	6/11/2024	ATH	0.836	\$196.00	\$163.86	EPSDT		Call with parent re: ABA therapy / history of services, prescription issue,
53	6/12/2024	ATH	0.075	\$196.00	\$14.70	EPSDT		draft communications re: scheduling of MDT meeting between Comprehensive, parent, HSCSN, and nurse
54	6/20/2024	ATH	1.262	\$196.00	\$247.35	EPSDT		Draft declaration of timeline of ABA therapy services
55	6/26/2024	ATH	0.074	\$196.00	\$14.50	EPSDT		Call to parent re: updated admin docs
56	6/27/2024	ATH	0.030	\$196.00	\$5.88	EPSDT		Call from parent re: summer program payment / services
57	6/28/2024	ATH	0.050	\$196.00	\$9.80	EPSDT		Call to parent (voicemail)
58	4/2/2024	ZSF	0.054	\$196.00	\$10.58	EPSDT		Read email updates from HSCSN re status of SCA re support services for ABA therapy

Matter: AJ, a minor

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<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
59	4/3/2024	ZSF	0.783	\$196.00	\$153.47	EPSDT		Tel call w parent re unmet PCA and nursing needs; email to HSCSN requesting status on single case agreement
60	4/4/2024	ZSF	0.105	\$196.00	\$20.58	EPSDT		Email communication with HSCSN re status to single case agreement for home health services to support ABA therapy
61	4/5/2024	ZSF	1.267	\$196.00	\$248.33	EPSDT		Confer w ATH re delay in negotiations by HSCSN with out of network home health provider and identify next steps; tel call w parent re same; email to HSCSN re same
62	4/9/2024	ZSF	0.587	\$196.00	\$115.05	EPSDT		Tel call to parent re continuing obstacles to receipt of home health services needed for ABA therapy
63	4/10/2024	ZSF	0.226	\$196.00	\$44.30	EPSDT		Email communications with HSCSN re status of home health services supports for ABA therapy and efforts to obtain these out of network
64	4/11/2024	ZSF	1.570	\$196.00	\$307.72	EPSDT		Email communications with parent re Medicare form required for HSCSN payment process with single case agreement with Infinity (11 min); tel call w parent and C. Sonosky (partially) re issues with provision of services (1 hr, 23 min.)
65	4/12/2024	ZSF	0.676	\$196.00	\$132.50	EPSDT		Email correspondence with HSCSN and tel call follow up w parent re resolution of issue re home health agency billing
66	4/17/2024	ZSF	0.051	\$196.00	\$10.00	EPSDT		Communications with parent re status of home health services
67	4/19/2024	ZSF	0.055	\$196.00	\$10.78	EPSDT		Email w ATH re status of home health assessment from yesterday
68	5/13/2024	ZSF	0.843	\$196.00	\$165.23	EPSDT		Tel call w parent re status of ABA therapy, court of appeals order
69	5/16/2024	ZSF	0.011	\$196.00	\$2.16	EPSDT		Read corrected notice of authorization for ABA therapy services from HSCSN
70	5/24/2024	ZSF	0.118	\$196.00	\$23.13	EPSDT		Tel call to parent re issues with delivery of ABA therapy services
71	5/29/2024	ZSF	0.038	\$196.00	\$7.45	EPSDT		VM returning parent's call
72	5/31/2024	ZSF	0.043	\$196.00	\$8.43	EPSDT		Tel call w parent re status of ABA therapy services and related supportive services
73	5/2/2024	ATH	0.166	\$196.00	\$32.54	Reimbursement		Call to parent re: better receipt photo for HSCSN reimbursement request, update calendar re: reimbursement

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
74	4/22/2024	ZSF	0.317	\$196.00	\$62.13	Reimbursement		Review outstanding balance from provider and email request for payment to HSCSN
75	6/27/2024	ATH	0.343	\$196.00	\$67.23	EPSDT MCO Grievance		Draft communication to HSCSN relating to grievance surrounding temporary drop in coverage

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: AO and JO, minors								
76	4/11/2024	AIN	0.126	\$196.00	\$24.70	EPSDT		Request signature for AO and JO HIPAAs from parent
77	4/2/2024	ATH	0.278	\$196.00	\$54.49	EPSDT		Draft communications to parent re: updating legal forms for TPM
78	4/4/2024	ATH	0.019	\$196.00	\$3.72	EPSDT		Documenting emails
79	4/11/2024	ATH	0.235	\$196.00	\$46.06	EPSDT		Call with parent to confirm contact information for case documents
80	4/15/2024	ATH	0.193	\$196.00	\$37.83	EPSDT		Outreach to provider for care plan on behalf of parent, file case documents
81	4/18/2024	ATH	1.188	\$196.00	\$232.85	EPSDT		MDT meeting with ZSF
82	4/24/2024	ATH	0.207	\$196.00	\$40.57	EPSDT		Call to Balance and Behavior re: contact with HSCSN network, acceptance of parent's insurance
83	4/25/2024	ATH	0.419	\$196.00	\$82.12	EPSDT		Call with provider re: ability to accept parent's insurance
84	5/2/2024	ATH	0.286	\$196.00	\$56.06	EPSDT		Draft email to parent re: referral for special education attorneys for AO
85	5/6/2024	ATH	0.750	\$196.00	\$147.00	EPSDT		MDT meeting with ZSF, parent, [REDACTED] and Dr. Felten
86	5/9/2024	ATH	1.104	\$196.00	\$216.38	EPSDT		Check healthcare coverage and other information on BCBS website
87	5/14/2024	ATH	1.170	\$196.00	\$229.32	EPSDT		MDT meeting with ZSF, and others to discuss next steps and care
88	5/21/2024	ATH	1.790	\$196.00	\$350.84	EPSDT		Draft communications to Dr. Felten re: contact information for providers for letter of medical necessity, outreach to providers
89	5/24/2024	ATH	0.204	\$196.00	\$39.98	EPSDT		Call to Care First re: authorization forms
90	5/28/2024	ATH	0.124	\$196.00	\$24.30	EPSDT		Call to CareFirst re: services / authorization
91	6/4/2024	ATH	1.244	\$196.00	\$243.82	EPSDT		Call to parent and [REDACTED] re: MDT follow up planning (5 min), pre-MDT meeting with advocate, parent, ZSF, and [REDACTED] (1 hour), review MDT meeting phone notes from ZSF (10 min)
92	6/6/2024	ATH	0.137	\$196.00	\$26.85	EPSDT		Assist with designation of personal representative form
93	6/18/2024	ATH	0.672	\$196.00	\$131.71	EPSDT		Draft communications to Care First CM re: request for authorization and in network providers

Matter: AO and JO, minors

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<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
94	4/19/2024	KLM	0.286	\$196.00	\$56.06	EPSDT		Read and think about email exchange between client and ZSF (5 min.); review and edit email to client (13 min.)
95	4/2/2024	ZSF	0.138	\$196.00	\$27.05	EPSDT		Review email to parent re communications with ABA therapy provider
96	4/3/2024	ZSF	0.375	\$196.00	\$73.50	EPSDT		Read and respond to email from parent re need for care coordination from HSCSN and email to HSCSN requesting assistance
97	4/4/2024	ZSF	0.268	\$196.00	\$52.53	EPSDT		Read emails from HSCSN, parent, PCP, and hospital re multi disciplinary team meeting to address outstanding needs upon anticipated discharge
98	4/5/2024	ZSF	0.072	\$196.00	\$14.11	EPSDT		Review emails from parent and providers re MTD meeting
99	4/8/2024	ZSF	0.130	\$196.00	\$25.48	EPSDT		Read and respond to emails re meeting with family and Sheppard Pratt
100	4/9/2024	ZSF	2.119	\$196.00	\$415.32	EPSDT		Participate in meeting with Sheppard Pratt and team re recommendations post discharge and send email to HSCSN requesting MTD meeting assistance
101	4/10/2024	ZSF	0.047	\$196.00	\$9.21	EPSDT		Email w HSCSN re availability for MTD meeting
102	4/11/2024	ZSF	0.021	\$196.00	\$4.12	EPSDT		Read psychiatrist's response email to HSCSN re MTD meeting
103	4/12/2024	ZSF	0.044	\$196.00	\$8.62	EPSDT		Send email to HSCSN re need to schedule hospital discharge meeting
104	4/15/2024	ZSF	0.259	\$196.00	\$50.76	EPSDT		Email correspondence with HSCSN re parent consent for HSCSN to communicate with providers re discharge from Sheppard Pratt
105	4/16/2024	ZSF	0.400	\$196.00	\$78.40	EPSDT		Email communications with HSCSN requesting assistance for provision of delayed ABA therapy services and identification of new provider for AO based on changed circumstances
106	4/17/2024	ZSF	0.913	\$196.00	\$178.95	EPSDT		Read and respond to emails from HSCSN and ABA provider re refusal by ABA provider to provide assessments to caregiver
107	4/18/2024	ZSF	1.123	\$196.00	\$220.11	EPSDT		Participate multidisciplinary team meeting re anticipated discharge from Sheppard Pratt and recommended services

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
108	4/19/2024	ZSF	2.130	\$196.00	\$417.48	EPSDT		Read and respond to HSCSN care manager update of multidisciplinary team meeting (26 min.); read and respond to parent email re next steps (1 hr, 22 min); discussion with [REDACTED] re next steps (19 min)
109	4/23/2024	ZSF	1.081	\$196.00	\$211.88	EPSDT		Tel call w parent and [REDACTED] re next steps re needed services upon discharge from hospital
110	4/24/2024	ZSF	0.080	\$196.00	\$15.68	EPSDT		Follow up with advocate re provider recommendations (3 min.) and with ATH re follow up with out of network ABA provider (2 min.)
111	4/25/2024	ZSF	1.286	\$196.00	\$252.06	EPSDT		Email correspondence with parent, [REDACTED] ATH, and HSCSN re next steps re recommendations upon discharge, including potential ABA therapy services from out of network provider and coordination of benefits (29 min); tel call w [REDACTED] re potential providers and communications with prescribing providers (18 min); review and comment on letter to PCP re potential providers (20 min)
112	4/26/2024	ZSF	0.137	\$196.00	\$26.85	EPSDT		Read email response from HSCSN re status of PCA services (2 min); email correspondence with [REDACTED] re provider referrals (6 min.)
113	4/29/2024	ZSF	0.483	\$196.00	\$94.67	EPSDT		Tel call w [REDACTED] re status of services for children and AO upon discharge today
114	4/30/2024	ZSF	0.235	\$196.00	\$46.06	EPSDT		Read email from ABA therapy provider re status of delayed services for boys (4 min); communications with HSCSN and parent re meeting with providers and HSCSN requests for information (10 min.)
115	5/1/2024	ZSF	0.401	\$196.00	\$78.60	EPSDT		Email communications with parent and providers re services requested at home (13 min.); email communications with HSCSN care manager re contact with parent (11 min.)
116	5/2/2024	ZSF	0.141	\$196.00	\$27.64	EPSDT		Read email from parent re services requested by PCP following discharge from hospital and consider next steps
117	5/3/2024	ZSF	0.118	\$196.00	\$23.13	EPSDT		Email communications with parent, [REDACTED] and provider re follow up on referrals and recommendations

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
118	5/6/2024	ZSF	1.263	\$196.00	\$247.55	EPSDT		Tel call provider, parent, and advocate re services (46 min.); review notes and follow up email to care managers re benefit coordination (19 min); email to parent following up on next steps (10 min.)
119	5/8/2024	ZSF	0.195	\$196.00	\$38.22	EPSDT		Read and respond to email from parent re status of ABA therapy and primary insurance coverage
120	5/9/2024	ZSF	0.971	\$196.00	\$190.32	EPSDT		Review primary insurance coverage of referred providers (33 min.) and tel call with [REDACTED] re status of available providers (24 min.)
121	5/14/2024	ZSF	1.370	\$196.00	\$268.52	EPSDT		Prepare for and participate in MDT follow up with HSCSN, providers, and parent (1 hr, 15 min.); follow up w [REDACTED] re next steps (7 min.)
122	5/16/2024	ZSF	0.304	\$196.00	\$59.58	EPSDT		Read and respond to parent and referring provider emails re potential out of network providers for Atty
123	5/17/2024	ZSF	0.179	\$196.00	\$35.08	EPSDT		Email with parent and provider re requests for authorization of services
124	5/20/2024	ZSF	1.410	\$196.00	\$276.36	EPSDT		Email communications with [REDACTED] and re status of referrals from HSCSN for therapeutic services (18 min.); research providers and authorization process, and status of providers in network (31 min.); email communications with primary insurer re authorization process (35 min.)
125	5/21/2024	ZSF	0.350	\$196.00	\$68.60	EPSDT		Confer w ATH re follow up with providers and primary insurance re authorization process needed before HSCSN coverage (9 min.); review ATH email to PCP re process for authorization and provider information (11 min.)
126	5/22/2024	ZSF	0.050	\$196.00	\$9.80	EPSDT		Read emails between HSCSN and parent re transportation care coordination issues
127	5/24/2024	ZSF	1.676	\$196.00	\$328.50	EPSDT		Prepare and draft support for various therapy services for AO and JO for PCP in coordination with [REDACTED] and parent (1 hr, 24 min.); email CareFirst care manager re submission of requests for authorization (13 min.)
128	5/28/2024	ZSF	0.058	\$196.00	\$11.37	EPSDT		Read and respond to email from primary insurance as related to coordination of benefits

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
129	5/30/2024	ZSF	0.739	\$196.00	\$144.84	EPSDT		Communications and coordination with primary care provider for well child visit documentation needed by ABA therapy provider (7 min.); review documentation (5 min.); communications with advocate re safe removal of children during parental crisis and process for requests (26 min.); email communications with ABA provider (6 min.)
130	5/31/2024	ZSF	0.301	\$196.00	\$59.00	EPSDT		Review emails from parent w supporting information for ABA therapy requests (7 min.); tel call w advocate re status of family psychiatric crisis and supports (11 min)
131	6/3/2024	ZSF	0.054	\$196.00	\$10.58	EPSDT		Email communications with advocate and parent re meeting to prepare for provider meeting tomorrow
132	6/4/2024	ZSF	2.930	\$196.00	\$574.28	EPSDT		Read email from HSCSN care manager re participation of providers at meeting (2 min.); tel call w [REDACTED] parent and ATH re preparation for MDT meeting (1 hr, 16 min); represent AO and JO in MDT meeting with HSCSN (45 min.); follow up call w [REDACTED] re next steps (14 min); tel notes to file (10 min.); email communications with HSCSN, [REDACTED], and parent re summary of MDT meeting and next steps (30 min.)
133	6/5/2024	ZSF	0.733	\$196.00	\$143.67	EPSDT		Tel call w [REDACTED] re status of all services requested and next steps
134	6/6/2024	ZSF	0.339	\$196.00	\$66.44	EPSDT		Email with parent re participation of primary insurance care manager in care coordination meetings (15 min); review consent form for primary insurance (5 min)
135	6/10/2024	ZSF	0.078	\$196.00	\$15.29	EPSDT		Read emails from parent and HSCSN re participation by primary insurance care manager in care coordination meetings
136	6/13/2024	ZSF	0.265	\$196.00	\$51.94	EPSDT		Tel call w [REDACTED] re status of each therapy service requested, fitness services denial, and next steps
137	6/18/2024	ZSF	0.234	\$196.00	\$45.86	EPSDT		Tel call w [REDACTED] re status of services (10 min.)
138	6/20/2024	ZSF	0.027	\$196.00	\$5.29	EPSDT		Monitor status of transportation to therapy services via emails between parent and HSCSN care management
139	6/28/2024	ZSF	0.568	\$196.00	\$111.33	EPSDT		Follow up email to HSCSN re status of authorizations and denials (8 min.); follow up email to parent re status of outstanding services (8 min); tel call w [REDACTED] re services and next steps (17 min)

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
140	4/25/2024	ATH	1.436	\$196.00	\$281.46	EPSDT MCO Grievance		Draft grievance re: lack of communication around care plan for clients from HSCSN / Comprehensive
141	4/29/2024	ATH	1.246	\$196.00	\$244.22	EPSDT MCO Grievance		Drafting grievance for parent re: Comprehensive health records / lack of services
142	4/30/2024	ATH	2.132	\$196.00	\$417.87	EPSDT MCO Grievance		Drafting grievance re: health records / lack of services
143	5/7/2024	ATH	0.847	\$196.00	\$166.01	EPSDT MCO Grievance		Review ZSF edits of grievance / draft email to HSCSN re: grievance
144	5/10/2024	ATH	2.221	\$196.00	\$435.32	EPSDT MCO Grievance		Review ZSF edits to grievance, update document with new files / attachments
145	5/14/2024	ATH	0.221	\$196.00	\$43.32	EPSDT MCO Grievance		Work on ZSF edits of grievance
146	5/23/2024	ATH	0.212	\$196.00	\$41.55	EPSDT MCO Grievance		Draft grievance and review ZSF edits
147	5/28/2024	ATH	0.750	\$196.00	\$147.00	EPSDT MCO Grievance		Review ZSF edits of grievance
148	5/29/2024	ATH	0.909	\$196.00	\$178.16	EPSDT MCO Grievance		Review of ZSF and KLM edits to grievance, preparation of copy of grievance for parent's review
149	5/30/2024	ATH	1.273	\$196.00	\$249.51	EPSDT MCO Grievance		Review of KLM and ZSF edits of grievance re: health records request
150	6/6/2024	ATH	0.580	\$196.00	\$113.68	EPSDT MCO Grievance		Review of KLM edits to health records grievance
151	6/11/2024	ATH	0.434	\$196.00	\$85.06	EPSDT MCO Grievance		Review of DAP proof and cite check of health records grievance
152	6/12/2024	ATH	0.068	\$196.00	\$13.33	EPSDT MCO Grievance		Draft communications to parent about grievance
153	6/18/2024	ATH	0.049	\$196.00	\$9.60	EPSDT MCO Grievance		Call to parent re: grievance
154	6/27/2024	ATH	0.050	\$196.00	\$9.80	EPSDT MCO Grievance		Call to parent re: grievance
155	6/28/2024	ATH	0.097	\$196.00	\$19.01	EPSDT MCO Grievance		Work on grievance re: records delay
156	5/29/2024	KLM	1.636	\$196.00	\$320.66	EPSDT MCO Grievance		Review and edit letter to HSCSN re grievance related to delayed services and lack of medical records on request
157	6/3/2024	KLM	0.460	\$196.00	\$90.16	EPSDT MCO Grievance		Review and edit letter to HSCSN re grievance
158	5/2/2024	ZSF	2.657	\$196.00	\$520.77	EPSDT MCO Grievance		Edit grievance re delay in ABA therapy evaluation and services
159	5/3/2024	ZSF	1.756	\$196.00	\$344.18	EPSDT MCO Grievance		Edit and update grievance re delay in ABA therapy evaluation and services

Matter: AO and JO, minors

Monday, September 23, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
160	5/4/2024	ZSF	1.508	\$196.00	\$295.57	EPSDT MCO Grievance		Update grievance re delay in ABA therapy evaluation and services
161	5/5/2024	ZSF	1.346	\$196.00	\$263.82	EPSDT MCO Grievance		Update grievance re delay in ABA therapy evaluation and services
162	5/14/2024	ZSF	0.530	\$196.00	\$103.88	EPSDT MCO Grievance		Edit grievance re delays and refusal to provide medical records upon request
163	5/29/2024	ZSF	0.870	\$196.00	\$170.52	EPSDT MCO Grievance		Review KLM edits to grievance and revise grievance
164	5/30/2024	ZSF	0.319	\$196.00	\$62.52	EPSDT MCO Grievance		Review revisions to grievance
165	6/11/2024	ZSF	0.224	\$196.00	\$43.90	EPSDT MCO Grievance		Review cite and proofing edits to grievance

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: AP, a minor								
166	4/24/2024	ACA	0.330	\$196.00	\$64.68	EPSDT		Review file and edit email to HSCSN re necessary services
167	4/2/2024	AIN	0.108	\$196.00	\$21.17	EPSDT		Request [REDACTED] signature on admin docs
168	4/5/2024	AIN	0.110	\$196.00	\$21.56	EPSDT		Summarize and send info re AP providers to ATH and ACA
169	4/2/2024	ATH	0.527	\$196.00	\$103.29	EPSDT		Call to parent re: documents to be signed, draft follow-up and communicate with AIN re: e-signatures
170	4/5/2024	ATH	0.221	\$196.00	\$43.32	EPSDT		Drafting communications with parent, updating phone notes
171	4/11/2024	ATH	0.396	\$196.00	\$77.62	EPSDT		Draft communications to parent re: PCP / specialist contact information
172	4/15/2024	ATH	0.093	\$196.00	\$18.23	EPSDT		Call with parent re: contact information for specialists
173	4/18/2024	ATH	0.067	\$196.00	\$13.13	EPSDT		Call to parent re: specialists / PCP contact information to arrange MDT meeting
174	4/24/2024	ATH	0.638	\$196.00	\$125.05	EPSDT		Draft communications to HSCSN re: MDT meeting and issues with CM
175	5/2/2024	ATH	0.080	\$196.00	\$15.68	EPSDT		Call to parent / left message, update phone notes
176	5/22/2024	ATH	0.066	\$196.00	\$12.94	EPSDT		Call to parent, draft email to parent
177	5/28/2024	ATH	0.066	\$196.00	\$12.94	EPSDT		Outreach to parent re: additional documents for coordination of care
178	6/4/2024	ATH	1.147	\$196.00	\$224.81	EPSDT		Draft 10-day letter to parent
179	6/11/2024	ATH	0.556	\$196.00	\$108.98	EPSDT		Draft 10 day letter
180	6/17/2024	ATH	0.170	\$196.00	\$33.32	EPSDT		Edit 10-day letter and draft email to ACA re: closing of case

Matter: AP, a minor

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<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: BC, a minor								
181	4/11/2024	ATH	0.477	\$196.00	\$93.49	EPSDT		Call to parent re: grievance and reimbursement
182	4/12/2024	ATH	0.077	\$196.00	\$15.09	EPSDT		Draft communications to parent re: documentation of grievance / reimbursement
183	5/1/2024	ATH	0.626	\$196.00	\$122.70	EPSDT		Draft admin docs, call with parent re: documentation of submitted grievance/reimbursement
184	5/2/2024	ATH	0.250	\$196.00	\$49.00	EPSDT		Draft admin docs for client to sign
185	5/31/2024	ATH	0.109	\$196.00	\$21.36	EPSDT		Call to parent re: admin docs, appeal of reimbursement denial (2 min), updating phone notes
186	6/3/2024	ATH	0.110	\$196.00	\$21.56	EPSDT		Call with parent re: admin docs and denial letter from HSCSN
187	6/5/2024	ATH	0.080	\$196.00	\$15.68	EPSDT		Call to parent re: signing admin docs and scanning and sending denial letter from HSCSN
188	6/14/2024	ATH	0.488	\$196.00	\$95.65	EPSDT		Draft communications to HSCSN re: medical supplies provider issues, call to parent (10 min)
189	6/24/2024	ATH	0.580	\$196.00	\$113.68	EPSDT		Call with parent (18 min) re: transportation, draft communications to HSCSN
190	6/25/2024	ATH	0.170	\$196.00	\$33.32	EPSDT		Draft communications to HSCSN re: transport issue
191	6/28/2024	ATH	0.095	\$196.00	\$18.62	EPSDT		Call to parent to discuss transportation services and next steps
192	4/2/2024	ZSF	0.081	\$196.00	\$15.88	EPSDT		Read emails re denial of transportation to community event
193	4/11/2024	ZSF	0.121	\$196.00	\$23.72	EPSDT		Confer w ATH re recent issues with transportation and incontinence supplies and our assistance re monitoring HSCSN response to grievances and reimbursement claims
194	4/12/2024	ZSF	0.070	\$196.00	\$13.72	EPSDT		Review ATH email to parent re ongoing need for assistance
195	5/7/2024	ZSF	0.165	\$196.00	\$32.34	EPSDT		Review retainer and authorizations for release of information
196	6/17/2024	ZSF	0.134	\$196.00	\$26.26	EPSDT		Read HSCSN denial of reimbursement for incontinence supplies and related emails
197	6/24/2024	ZSF	0.161	\$196.00	\$31.56	EPSDT		Edit ATH email to HSCSN requesting assistance with wheelchair accessible transportation previously stopped due to care management lapse

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
198	6/11/2024	ATH	0.874	\$196.00	\$171.30	Reimbursement		Reviewing reimbursement request and denial, contact re: details and admin docs, call with parent (6 min)
199	6/18/2024	ATH	0.113	\$196.00	\$22.15	Reimbursement		Call to parent re: original reimb submission
200	4/10/2024	ZSF	0.025	\$196.00	\$4.90	Reimbursement		Read email from care navigation at HSCSN re receipt of reimbursement claim
201	5/29/2024	ATH	0.752	\$196.00	\$147.39	EPSDT MCO Grievance		Call to parent re: grievance / reimbursement (x min), reviewing admin docs
202	6/18/2024	ATH	0.289	\$196.00	\$56.64	EPSDT MCO Grievance		Draft communications to HSCSN re: medical supplies grievance
203	6/28/2024	ATH	0.560	\$196.00	\$109.76	EPSDT MCO Grievance		Draft grievance email to HSCSN re: transportation order expiring
204	4/5/2024	ZSF	0.279	\$196.00	\$54.68	EPSDT MCO Grievance		Read parent grievance to HSCSN re transportation issues
205	6/18/2024	ZSF	0.423	\$196.00	\$82.91	EPSDT MCO Grievance		Edit ATH grievance to HSCSN re delivery of unwanted incontinence products from cancelled provider
206	6/28/2024	ZSF	0.092	\$196.00	\$18.03	EPSDT MCO Grievance		Review grievance re standing transportation order expiration

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: [REDACTED]								
207	4/19/2024	KLM	0.115	\$196.00	\$22.54	Reimbursement		Review and edit letter to HSCSN re past due reimbursement decision
208	4/22/2024	ZSF	0.100	\$196.00	\$19.60	Reimbursement		Read email response from HSCSN re overdue decision (4 min.); instructions to AIN to follow up with parent re receipt of letter and payment (2 min.)
209	5/1/2024	ZSF	0.074	\$196.00	\$14.50	Reimbursement		Review denial notice
210	5/2/2024	ZSF	0.224	\$196.00	\$43.90	Reimbursement		Consider advice to parent re appeal of partial denial of reimbursement
211	5/20/2024	ZSF	0.750	\$196.00	\$147.00	Reimbursement		Assess next steps re denial
212	5/30/2024	ZSF	0.026	\$196.00	\$5.10	Reimbursement		Follow up with parent re potential appeal of partial denial by HSCSN
213	6/17/2024	AIN	1.243	\$196.00	\$243.63	MCO Appeal - Reimbursement		Work on appeal
214	6/18/2024	AIN	1.989	\$196.00	\$389.84	MCO Appeal - Reimbursement		Create exhibits for and work on appeal
215	6/20/2024	AIN	1.573	\$196.00	\$308.31	MCO Appeal - Reimbursement		Prepare exhibits to appeal
216	6/20/2024	ATH	0.749	\$196.00	\$146.80	MCO Appeal - Reimbursement		Proof and cite check for AIN of Reimb Appeal
217	5/21/2024	KLM	0.050	\$196.00	\$9.80	MCO Appeal - Reimbursement		Confer with ZSF and AIN re appeal of reimbursement partial denial
218	5/21/2024	KLM	0.281	\$196.00	\$55.08	MCO Appeal - Reimbursement		Read and think about email from ZSF re potential appeal of denial (11 min.); draft response to ZSF and AIN (6 min.)
219	6/18/2024	KLM	0.358	\$196.00	\$70.17	MCO Appeal - Reimbursement		Review and edit appeal of denial of reimbursement claim
220	5/21/2024	ZSF	0.080	\$196.00	\$15.68	MCO Appeal - Reimbursement		Review KLM response re next steps re denial (2 min); confer with KLM and AIN re potential appeal (3 min)
221	6/17/2024	ZSF	2.901	\$196.00	\$568.60	MCO Appeal - Reimbursement		Draft appeal of reimbursement denial

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222	6/18/2024	ZSF	0.237	\$196.00	\$46.45	MCO Appeal - Reimbursement		Review KLM edits to appeal of reimbursement denial and provide instructions to AIN to finalize appeal and exhibits
223	6/20/2024	ZSF	0.364	\$196.00	\$71.34	MCO Appeal - Reimbursement		Review final edits to appeal and all exhibits
224	4/17/2024	AIN	1.343	\$196.00	\$263.23	EPSDT MCO Grievance		Review ZSF edits to and edit grievance
225	6/21/2024	AIN	0.367	\$196.00	\$71.93	EPSDT MCO Grievance		Draft and send email to appeals coordinator containing appeal (16 min); call ZSF re appeals coordinator response and draft/send response to appeals coordinator (3 min); send fax to appeals coordinator (3 min)
226	6/27/2024	AIN	0.548	\$196.00	\$107.41	EPSDT MCO Grievance		Work on grievance re ICFS fraudulent services
227	4/24/2024	KLM	0.250	\$196.00	\$49.00	EPSDT MCO Grievance		Review and edit letter to HSCSN re grievance
228	4/25/2024	KLM	1.376	\$196.00	\$269.70	EPSDT MCO Grievance		Review and edit letter to HSCSN re grievance
229	4/25/2024	ZSF	0.638	\$196.00	\$125.05	EPSDT MCO Grievance		Review KLM edits to grievance re ICFS fraudulent services (4 min.); continue draft of care management grievance
230	5/14/2024	ZSF	0.017	\$196.00	\$3.33	EPSDT MCO Grievance		Read parent's response to questions re grievance for mental health services
231	6/6/2024	ZSF	0.425	\$196.00	\$83.30	EPSDT MCO Grievance		Clarify questions with parent for grievance related to Inner City core service agency fraudulent services

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Matter: CD, a minor								
232	5/13/2024	DAP	0.417	\$196.00	\$81.73	EPSDT		Call w/ parent re authorization for vision therapy and take notes (21 min); attempt to review letter of medical necessity in email from parent and reply to email (4 min)
233	5/15/2024	DAP	0.167	\$196.00	\$32.73	EPSDT		Draft email to UM re LMN and vision therapy services authorization
234	5/16/2024	DAP	0.367	\$196.00	\$71.93	EPSDT		Review ZSF edits to drafted email re authorization of services and email parent drafted email for review (7 min); accept parent edit to email and send to UM (3 min); review reply email from UM (3 min); email parent instructions re authorization submission for provider (6 min); email UM re update of forward of email and form to parent (3 min)
235	5/22/2024	DAP	0.083	\$196.00	\$16.27	EPSDT		Review submission from visual therapy provider to UM
236	5/23/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Calculate and review date of HSCSN response due re appeals 1222, 1223, and 1224 (3 min); calculate and review response/decision from HSCSN re visual therapy services due date (3 min)
237	6/6/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Attempt to call parent and leave voicemail
238	6/7/2024	DAP	0.167	\$196.00	\$32.73	EPSDT		Email UM re overdue determination of approval of vision services
239	6/11/2024	DAP	0.200	\$196.00	\$39.20	EPSDT		Attempt to call Ms. Reed-Countee re overdue determination for visual therapy services and leave voicemail (3 min); call w/ Ms. Reed-Countee re overdue determination (3 min); forward email submission from visual therapy provider and follow-up email sent by TPM 06-07 (6 min)
240	6/12/2024	DAP	0.283	\$196.00	\$55.47	EPSDT		Message ZSF re email from parent and next steps for overdue determination of services (8 min); email reply to parent (1 min); email UM requesting updates (8 min)
241	6/13/2024	DAP	0.650	\$196.00	\$127.40	EPSDT		Attempt to call parent re services and providers and leave voicemail (3 min); discuss HSCSN email responses, questions for parent, and next steps w/ ZSF (12 min); call w/ parent re visual therapy services and referring providers (7 min); message ZSF updates from parent (5 min); draft email to parent re visual therapy services, primary insurer policies, and referring provider (12 min)

Matter: CD, a minor

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242	6/14/2024	DAP	0.250	\$196.00	\$49.00	EPSDT		Review emails from ZSF and Dr. Levey re determination of visual therapy services (8 min)accept KLM edits and send drafted email to parent re next steps for determination of visual therapy services (2 min)update HIPAA form and send to ZSF for review (5 min)
243	6/18/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Review email from ZSF re primary insurer authorization for visual therapy services
244	6/13/2024	KLM	0.100	\$196.00	\$19.60	EPSDT		Review and edit email to client re vision therapy services
245	5/14/2024	ZSF	0.133	\$196.00	\$26.07	EPSDT		Read letter of medical necessity re vision therapy for out of network provider and respond to parent re follow up questions
246	5/16/2024	ZSF	0.432	\$196.00	\$84.67	EPSDT		Read and respond to email from parent re coverage for vision therapy by primary insurer (8 min.); research vision therapy provider (6 min.); edit DAP email to HSCSN re coordination of benefit and process for authorization of services from out of network provider (11 min.)
247	6/7/2024	ZSF	0.026	\$196.00	\$5.10	EPSDT		Review DAP email to HSCSN re overdue decision re request for prior authorization of specialized vision therapy services
248	6/13/2024	ZSF	1.357	\$196.00	\$265.97	EPSDT		Read HSCSN responses re status of request of Out of Network provider (16 min.); confer w DAP re info needed from parent (12 min); written response to HSCSN (53 min.)
249	6/17/2024	ZSF	0.045	\$196.00	\$8.82	EPSDT		Review updated HIPAA form
250	4/8/2024	DAP	0.800	\$196.00	\$156.80	Reimbursement		Call w/ parent re outstanding reimbursement claims (18 min); review reimbursement denial letter re claim 1223 (6 min); discuss next steps re outstanding claims and parent questions w/ MLH (19 min); schedule meeting w/ MLH, ZSF, and KLM (5 min)
251	4/9/2024	DAP	0.533	\$196.00	\$104.47	Reimbursement		Discuss outstanding reimbursement issues and questions from parent w/ MLH, ZSF, and KLM (32 min)
252	4/16/2024	DAP	0.317	\$196.00	\$62.13	Reimbursement		Review denial letters re claims 1223 and 1224 from HSCSN for OT (10 min); review denial letter re claim 1239 (5 min); review reimbursement submission claim 1276 (4 min)
253	6/11/2024	DAP	0.050	\$196.00	\$9.80	Reimbursement		Review email from Ms. F forwarding email from Care Navigation

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
254	6/24/2024	DAP	0.283	\$196.00	\$55.47	Reimbursement		Review reimbursement submission by parent and update reimbursement spreadsheet
255	4/9/2024	KLM	0.550	\$196.00	\$107.80	Reimbursement		Confer with ZSF, DAP, and MLH re next steps on reimbursement claims for CD
256	4/9/2024	MLH	0.533	\$196.00	\$104.47	Reimbursement		Confer with KLM, ZFS, and DAP re settlement agreement provisions
257	4/10/2024	MLH	0.588	\$196.00	\$115.25	Reimbursement		Telephone call with [REDACTED]; memo to file
258	4/9/2024	ZSF	0.550	\$196.00	\$107.80	Reimbursement		Work w MLH, KLM and DAP to determine application of settlement agreement to outstanding claims and next steps
259	4/10/2024	ZSF	0.031	\$196.00	\$6.08	Reimbursement		Read MLH email update re conversation w parent re application of settlement agreement to outstanding claims and next steps
260	6/11/2024	ZSF	0.074	\$196.00	\$14.50	Reimbursement		Review DAP email to HSCSN Utilization Management re overdue determination of authorization request for out of network vision therapy services
261	6/12/2024	ZSF	0.377	\$196.00	\$73.89	Reimbursement		Assess next steps re denied and potentially denied reimbursement claims 1237 and 1276
262	6/13/2024	ZSF	0.124	\$196.00	\$24.30	Reimbursement		Confer with DAP re status of reimbursement claims, HSCSN overdue decisions, and next steps
263	6/17/2024	ZSF	0.387	\$196.00	\$75.85	Reimbursement		Review DAP email to parent re outstanding factual questions re pending claims (1 min); read appeal extension request letter and provide DAP instructions for follow up to HSCSN re written reason for same (15 min.); review tracking log of outstanding reimbursement claim determinations and appeal decisions (7 min.)
264	6/25/2024	AIN	2.284	\$196.00	\$447.66	MCO Appeal - Reimbursement		Proof and cite-check appeal
265	6/25/2024	ATH	0.230	\$196.00	\$45.08	MCO Appeal - Reimbursement		Proof of sworn statement
266	4/25/2024	DAP	0.200	\$196.00	\$39.20	MCO Appeal - Reimbursement		Email MLH and ZSF re claim 1222 denial appeal due 05-13
267	5/8/2024	DAP	0.250	\$196.00	\$49.00	MCO Appeal - Reimbursement		Review reimbursement claim information submitted 02-05 and forward EOBs to ZSF

Matter: CD, a minor

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268	5/9/2024	DAP	1.367	\$196.00	\$267.93	MCO Appeal - Reimbursement		Attempt to call parent re reimbursement claim appeal and leave voicemail (3 min); email parent re forthcoming appeal (6 min); proof appeal re claims 1222, 1223, and 1224 (1 hr, 13 min)
269	5/10/2024	DAP	1.800	\$196.00	\$352.80	MCO Appeal - Reimbursement		Cite check and add bates numbering to appeal (1 hr, 10 min); prepare exhibits for filing (38 min)
270	5/13/2024	DAP	0.867	\$196.00	\$169.93	MCO Appeal - Reimbursement		Call w/ parent re edits to appeal and take notes (14 min); discuss parent questions w/ ZSF (14 min); attempt to call parent and leave voicemail (2 min); accept edits to appeal and prepare for filing (17 min); file appeal via email, including cc's (5 min)
271	6/10/2024	DAP	0.183	\$196.00	\$35.87	MCO Appeal - Reimbursement		Review claim 1276 and overdue appeal determination from HSCSN (8 min); call parent re overdue determination (3 min)
272	6/13/2024	DAP	1.500	\$196.00	\$294.00	MCO Appeal - Reimbursement		Review submissions for claims 1237 and 1276 (23 min); email parent re facts of claim submissions and overdue appeal determinations (11 min); create reimbursement spreadsheet to track appeals (48 min); discuss status of reimbursements with ZSF (7 min); review email reply from parent (1 min)
273	6/17/2024	DAP	0.567	\$196.00	\$111.13	MCO Appeal - Reimbursement		Update CD reimbursement spreadsheet (10 min); attempt to call parent re appeal 1237 and leave voicemail messages (4 min); review and send letter re appeal of claims 1222, 1223, and 1224 to ZSF (14 min); draft email to parent re appeals from 03-19 and 05-13-2024 and upcoming appeals (6 min)
274	6/18/2024	DAP	1.317	\$196.00	\$258.13	MCO Appeal - Reimbursement		Email K. Nettles re letter dated 06-12 and information needed (20 min); prepare and send parent updated HIPAA form (6 min); review emails from parent, including attachments of reimbursement submission and primary insurer EOBs (36 min); message ZSF re appeal and revised EOB (3 min); update reimbursement spreadsheet (14 min)
275	6/20/2024	DAP	2.217	\$196.00	\$434.53	MCO Appeal - Reimbursement		Call w/ parent re outstanding question regarding claim 1276 (10 min); draft appeal of claim 1237 (2 hr); send ZSF approved email to Risk Management re appeal of claims 1175 and 1177 submitted 03-19, including original attachments (3 min)

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
276	6/21/2024	DAP	3.233	\$196.00	\$633.67	MCO Appeal - Reimbursement		Draft sworn statement in support of appeal of claim 1237 (1 hr, 43 min); message ZSF re questions for parent (4 min); call w/ parent re outstanding questions for appeal re speech therapy (41 min); message ZSF re answers from parent (6 min); review documents provided by parent for appeal and sworn statement (12 min); call w/ ZSF re factual information for appeal (28 min)
277	6/24/2024	DAP	0.533	\$196.00	\$104.47	MCO Appeal - Reimbursement		Message ZSF re questions for sworn statement (6 min); call w/ ZSF re sworn statement (9 min); draft email to parent re sworn statement and appeal (3 min); create exhibits for appeal (14 min)
278	6/25/2024	DAP	6.100	\$196.00	\$1,195.60	MCO Appeal - Reimbursement		Edit appeal and sworn statement (1 hr); draft email to parent with instructions on appeal review (7 min); review ATH proof (24 min); assemble and edit exhibits for filing (1 hr, 36 min); calls w/ parent re sworn statement (43 min); prepare sworn statement for e-signature (12 min); call w/ KLM re updates (6 min); call w/ KLM and ZSF re edits (6 min); review KLM edits and clean copy for parent second review of documents (22 min); edit sworn statement and prepare for second e-signature (26 min); add bates pagination and pincites to appeal (36 min) draft fax cover sheet and cover email for appeal submission (8 min); submit appeal via fax and email to risk management (20 min)
279	6/27/2024	DAP	0.200	\$196.00	\$39.20	MCO Appeal - Reimbursement		Review email from HSCSN Appeals and draft reply email (9 min); review AOR form and send drafted email (3 min)
280	6/28/2024	DAP	0.367	\$196.00	\$71.93	MCO Appeal - Reimbursement		Attempt to call K. Nettles re appeals (1 min); review email from 06-27 and draft new email reply (8 min); email T. McCray detailing outstanding questions for appeals (13 min)
281	5/9/2024	KLM	1.125	\$196.00	\$220.50	MCO Appeal - Reimbursement		Review and edit appeal of reimbursement denial
282	6/24/2024	KLM	2.216	\$196.00	\$434.34	MCO Appeal - Reimbursement		Review and edit letter and sworn statement re appeal to HSCSN of reimbursement partial denial
283	6/25/2024	KLM	0.623	\$196.00	\$122.11	MCO Appeal - Reimbursement		Review and edit updates from client re letter and sworn statement re appeal to HSCSN of reimbursement partial denial
284	5/8/2024	ZSF	1.588	\$196.00	\$311.25	MCO Appeal - Reimbursement		Draft appeal
285	5/9/2024	ZSF	0.474	\$196.00	\$92.90	MCO Appeal - Reimbursement		Review DAP email to parent re status of appeal (3 min.); review KLM edits to appeal and update appeal (25 min.)

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
286	5/13/2024	ZSF	0.421	\$196.00	\$82.52	MCO Appeal - Reimbursement		Confer w DAP re parent questions re appeal and next steps (14 min.); review cite checks to appeal (9 min.)
287	6/10/2024	ZSF	0.048	\$196.00	\$9.41	MCO Appeal - Reimbursement		Email w DAP re addressing lack of response from HSCSN re appeal and parent response
288	6/18/2024	ZSF	0.853	\$196.00	\$167.19	MCO Appeal - Reimbursement		Edit DAP email to HSCSN requesting information on decision to extend decision on appeal for reimbursement (13 min.); review additional decisions to appeal and related emails (38 min.)
289	6/20/2024	ZSF	0.066	\$196.00	\$12.94	MCO Appeal - Reimbursement		Instructions to DAP re drafting factual portions of appeal
290	6/21/2024	ZSF	1.665	\$196.00	\$326.34	MCO Appeal - Reimbursement		Review DAP draft appeal of denial of reimbursement claim; work through issues with DAP (28 min)
291	6/24/2024	ZSF	0.164	\$196.00	\$32.14	MCO Appeal - Reimbursement		Read HSCSN response to request for decision on overdue appeal re denial of reimbursement claim
292	6/24/2024	ZSF	4.544	\$196.00	\$890.62	MCO Appeal - Reimbursement		Draft and revise appeal of claim 1237 denial
293	6/25/2024	ZSF	1.588	\$196.00	\$311.25	MCO Appeal - Reimbursement		Review revised sworn statement, appeal, and exhibits
294	6/27/2024	ZSF	0.093	\$196.00	\$18.23	MCO Appeal - Reimbursement		Review and edit DAP response to HSCSN appeals manager re validity of appointment of authorized representative
295	6/28/2024	ZSF	0.048	\$196.00	\$9.41	MCO Appeal - Reimbursement		Review DAP email follow up to HSCSN re status of overdue appeal decision and issue re appointment of authorized representative

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: Coates, Sacari								
296	5/1/2024	DAP	0.150	\$196.00	\$29.40	Reimbursement		Review due date of ABA services transportation reimbursement and draft email to parent re same
297	6/6/2024	DAP	0.117	\$196.00	\$22.93	Reimbursement		Email parent re ABA transportation reimbursement request
298	4/29/2024	DAP	0.100	\$196.00	\$19.60	MCO Appeal - Reimbursement		Review letter from HSCSN re resolution of appeal
299	4/10/2024	DAP	0.050	\$196.00	\$9.80	Reimbursement - Fair Hearing		Review email from ZSF to HSCSN re fair hearing status conference
300	4/22/2024	DAP	0.183	\$196.00	\$35.87	Reimbursement - Fair Hearing		Attend status conference and take notes
301	4/23/2024	DAP	0.083	\$196.00	\$16.27	Reimbursement - Fair Hearing		Review updated status conference order
302	4/25/2024	DAP	0.150	\$196.00	\$29.40	Reimbursement - Fair Hearing		Review emails from H. Coley and ZSF re fair hearing and settlement
303	5/1/2024	DAP	0.033	\$196.00	\$6.47	Reimbursement - Fair Hearing		Review final order from OAH dismissing case
304	4/4/2024	ZSF	0.193	\$196.00	\$37.83	Reimbursement - Fair Hearing		Follow up with parent re HSCSN offer to reimburse in full
305	4/10/2024	ZSF	0.449	\$196.00	\$88.00	Reimbursement - Fair Hearing		Read OAH fair hearing scheduling order and email communications with HSCSN re acceptance of settlement offer
306	4/22/2024	ZSF	0.256	\$196.00	\$50.18	Reimbursement - Fair Hearing		Participate in OAH status conference
307	4/23/2024	ZSF	0.139	\$196.00	\$27.24	Reimbursement - Fair Hearing		Read scheduling order for second status conference (5 min.); read notice of appearance by HSCSN counsel (3 min.)
308	4/25/2024	ZSF	0.578	\$196.00	\$113.29	Reimbursement - Fair Hearing		Read and respond to emails from HSCSN counsel and staff re status of payment resolving case and petitioner's request for written notice (24 min.); review written notice (4 min); email parent re status of payment (6 min.)
309	4/30/2024	ZSF	0.101	\$196.00	\$19.80	Reimbursement - Fair Hearing		Participate in second and final OAH fair hearing status conference

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
310	5/2/2024	ZSF	0.050	\$196.00	\$9.80	Reimbursement - Fair Hearing		Read final order

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: CS, a minor								
311	4/8/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Review services approval letter from HSCSN and email parent re same
312	4/9/2024	DAP	0.250	\$196.00	\$49.00	EPSDT		Email ZSF re email from parent (3 min); draft email reply to parent re outstanding issues w/ Linac POC (12 min)
313	5/1/2024	DAP	0.033	\$196.00	\$6.47	EPSDT		Attempt to call parent re HIPAA and outstanding issues with Linac and leave voicemail
314	5/6/2024	DAP	0.433	\$196.00	\$84.87	EPSDT		Call w/ parent and take notes re outstanding Linac Plan of Care and ABA provider issues
315	4/8/2024	ZSF	0.020	\$196.00	\$3.92	EPSDT		Review and edit email to parent re authorization for durable medical equipment
316	4/9/2024	ZSF	0.042	\$196.00	\$8.23	EPSDT		Review DAP email to parent re PCA issues

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: CW, a minor								
317	5/10/2024	ZSF	0.052	\$196.00	\$10.19	EPSDT MCO Appeal		Review exhibits to appeal
318	4/24/2024	DAP	0.067	\$196.00	\$13.13	Reimbursement		Call w/ parent re outstanding reimbursement claims forwarded to Amerihealth from DHCF
319	4/26/2024	DAP	0.050	\$196.00	\$9.80	Reimbursement		Review emails from parent and ZSF
320	4/24/2024	ZSF	0.070	\$196.00	\$13.72	Reimbursement		Discussion w DAP re reimbursement claim assistance for parent
321	4/26/2024	ZSF	0.196	\$196.00	\$38.42	Reimbursement		Communications with parent re potential reimbursement issue with AmeriHealth
322	4/8/2024	KLM	0.028	\$196.00	\$5.49	Reimbursement - Fair Hearing		Review and edit motion for voluntary dismissal
323	4/2/2024	ZSF	0.450	\$196.00	\$88.20	Reimbursement - Fair Hearing		Review status of payment and begin draft of motion to dismiss
324	4/5/2024	ZSF	0.417	\$196.00	\$81.73	Reimbursement - Fair Hearing		Draft motion to dismiss
325	4/8/2024	ZSF	0.298	\$196.00	\$58.41	Reimbursement - Fair Hearing		Finalize and file motion to dismiss
326	4/15/2024	ZSF	0.051	\$196.00	\$10.00	Reimbursement - Fair Hearing		Read OAH Final Order

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: Davis, Jr., G								
327	4/8/2024	DAP	0.100	\$196.00	\$19.60	Reimbursement		Email parent re transportation reimbursement request decision
328	4/24/2024	DAP	0.200	\$196.00	\$39.20	Reimbursement		Email to Care Navigation re reimbursement claim 1215 (9 min); review email from parent re lack of payment for reimbursement claim (3 min)
329	4/26/2024	DAP	0.133	\$196.00	\$26.07	Reimbursement		Review reimbursement approval email from Care Navigation (4 min); email reply to care navigation (4 min)
330	5/3/2024	DAP	0.200	\$196.00	\$39.20	Reimbursement		Review email from parent re receipt of HSCSN payment and reply (5 min); email Care Navigation re receipt of payment (7 min)
331	4/24/2024	ZSF	0.071	\$196.00	\$13.92	Reimbursement		Review DAP email to HSCSN re reimbursement decision
332	4/26/2024	ZSF	0.160	\$196.00	\$31.36	Reimbursement		Read decision and provide instructions to DAP re follow up with parent re status of payment

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Matter: DC, a minor								
333	4/26/2024	AIN	0.161	\$196.00	\$31.56	EPSDT		Request signature on [REDACTED] docs
334	4/22/2024	ATH	1.212	\$196.00	\$237.55	EPSDT		Creating new admin docs / phone notes for [REDACTED]
335	4/26/2024	ATH	0.709	\$196.00	\$138.96	EPSDT		[REDACTED] Admin Docs, call to parent (5 min)
336	4/29/2024	ATH	0.318	\$196.00	\$62.33	EPSDT		Securing and checking [REDACTED] Admin Docs, call to parent (2 min) re: signature for HIPAA, out reach to HSCSN UM to confirm receipt of Dr order for nursing from last week
337	5/7/2024	ATH	0.170	\$196.00	\$33.32	EPSDT		Draft email to HSCSN re: care manager contact information
338	5/20/2024	ATH	0.478	\$196.00	\$93.69	EPSDT		Draft communications to HSCSN re: nursing services
339	5/30/2024	ATH	0.654	\$196.00	\$128.18	EPSDT		Call to parent re: nursing services and checking in (10 min), update phone notes and draft communications to HSCSN re meeting
340	6/4/2024	ATH	0.217	\$196.00	\$42.53	EPSDT		Call to parent re: nursing / general check in
341	6/5/2024	ATH	0.532	\$196.00	\$104.27	EPSDT		Call to parent re: meeting with HSCSN and nursing about scheduling (9 min), draft communications to HSCSN re: meeting about nursing schedules
342	6/10/2024	ATH	1.434	\$196.00	\$281.06	EPSDT		Meeting with ZSF, HSCSN, Community Care Nursing Services / updating phone notes
343	6/11/2024	ATH	0.562	\$196.00	\$110.15	EPSDT		Draft communications to parent re: summer camp options, PT evaluation, and MDT meeting follow-up
344	6/14/2024	ATH	0.131	\$196.00	\$25.68	EPSDT		Call to parent re: services / lack of nursing
345	6/17/2024	ATH	1.529	\$196.00	\$299.68	EPSDT		Call to parent re: lack of nursing services / general updates (14 min); call and email to ZSF re: case issues / grievance; draft email to HSCSN; meeting with ZSF and parent
346	6/24/2024	ATH	0.373	\$196.00	\$73.11	EPSDT		Call with parent (15 min), draft comms to HSCSN, discuss next steps with ZSF
347	6/27/2024	ATH	0.102	\$196.00	\$19.99	EPSDT		Draft communications to HSCSN re: nursing services replacement
348	6/28/2024	ATH	0.537	\$196.00	\$105.25	EPSDT		Call to parent re: next steps (9 min); draft communication to HSCSN re: meeting with CM

Matter: DC, a minor

Monday, September 23, 2024

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349	4/26/2024	DAP	0.200	\$196.00	\$39.20	EPSDT		██████████: Review and send administrative documents to parent for e-signature
350	4/12/2024	ZSF	0.028	\$196.00	\$5.49	EPSDT		Email w parent re referral to family re nursing issues and assistance needed
351	4/18/2024	ZSF	0.794	\$196.00	\$155.62	EPSDT		Return vm to parent requesting legal assistance to obtain services for her child
352	4/22/2024	ZSF	0.221	\$196.00	\$43.32	EPSDT		Instructions to ATH re preparation of retainer and consent forms to begin legal assistance to obtain services for child
353	4/29/2024	ZSF	0.059	\$196.00	\$11.56	EPSDT		Email ATH re communications with HSCSN re status of receipt of request for nursing
354	5/6/2024	ZSF	1.191	\$196.00	\$233.44	EPSDT		Tel call with parent re urgent issue re lack of home health care services and tel notes to file
355	5/7/2024	ZSF	0.227	\$196.00	\$44.49	EPSDT		Review ATH email to HSCSN re care manager contact information (1min); email to HSCSN Chief Medical Officer re ongoing delay in provision of critical PCA services (12 min.)
356	5/8/2024	ZSF	0.256	\$196.00	\$50.18	EPSDT		Tel call to HSCSN Chief Medical Officer re solutions to address lack of authorized home health services and parent re resolution
357	5/20/2024	ZSF	0.203	\$196.00	\$39.79	EPSDT		Read and respond to parent email re interruption and other issues concerning nursing services (3 min.); review ATH email to HSCSN re addressing issues (5 min.); read emails from HSCSN and parent re current status of nursing services (4 min.)
358	5/21/2024	ZSF	0.926	\$196.00	\$181.50	EPSDT		Read and respond to email from parent re fitness therapy provider
359	5/30/2024	ZSF	0.178	\$196.00	\$34.89	EPSDT		Read email from parent to HSCSN requesting assistance with staffing issues and provide instructions to ATH re follow up (4 min.); review ATH email to HSCSN re assistance with communications with home health agency and search for other agency (6 min.)
360	5/31/2024	ZSF	0.023	\$196.00	\$4.51	EPSDT		Read email from ATH to HSCSN re need for new home care agency
361	6/5/2024	ZSF	0.099	\$196.00	\$19.40	EPSDT		Review ATH email to HSCSN re ongoing inadequate nursing coverage and request to meet to discuss options

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362	6/10/2024	ZSF	1.054	\$196.00	\$206.58	EPSDT		Represent DC in meeting with Community Nursing Care, HSCSN and parent re gap of services and severe quality issues
363	6/11/2024	ZSF	0.318	\$196.00	\$62.33	EPSDT		Review ATH email parent re outstanding therapy services and next steps
364	6/17/2024	ZSF	1.029	\$196.00	\$201.68	EPSDT		Read and respond to email from ATH re discharge from home health agency (10 min.); review ATH emails to HSCSN and home health agency re discharge and next steps (4 min.); telephone call with parent and ATH re next steps (43 min.); email correspondence with HSCSN re same (4 min.)
365	6/24/2024	ZSF	0.093	\$196.00	\$18.23	EPSDT		Read and respond to ATH email re lack of nursing services and ombudsman's response (4 min); review email to HSCSN requesting action (1 min.)
366	6/28/2024	ZSF	0.293	\$196.00	\$57.43	EPSDT		Email correspondence with HSCSN re re critical need for nursing services
367	6/17/2024	ATH	0.569	\$196.00	\$111.52	EPSDT MCO Grievance		Draft grievance re: discharge with notice by nursing agency
368	6/18/2024	ATH	1.223	\$196.00	\$239.71	EPSDT MCO Grievance		Grievance regarding CCNS discharge practices
369	6/20/2024	ATH	0.319	\$196.00	\$62.52	EPSDT MCO Grievance		Draft grievance re: nursing services discharge
370	6/21/2024	ATH	2.056	\$196.00	\$402.98	EPSDT MCO Grievance		Draft grievance re: nursing
371	6/24/2024	ATH	4.265	\$196.00	\$835.94	EPSDT MCO Grievance		Draft grievance re: Discharge
372	6/26/2024	ATH	1.919	\$196.00	\$376.12	EPSDT MCO Grievance		Draft grievance re: CCNS discharge

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Matter: DT, a minor								
373	4/10/2024	AIN	0.880	\$196.00	\$172.48	EPSDT		Review phone notes/emails (3 min); draft and send A. Bayer email re care manager (7 min); call Better Mornings re intake form and process (14 min); fill out Better Mornings intake form and request parent signature (20 min); draft email to care manager re OT services (9 min)
374	4/15/2024	AIN	0.279	\$196.00	\$54.68	EPSDT		Draft and send email to J. Palmer re OT and mental health services for DT
375	4/17/2024	AIN	0.037	\$196.00	\$7.25	EPSDT		Draft and send email to J. Palmer
376	4/18/2024	AIN	0.020	\$196.00	\$3.92	EPSDT		Call parent and leave voicemail re Better Mornings intake form
377	4/22/2024	AIN	0.020	\$196.00	\$3.92	EPSDT		Call parent and leave voicemail re Better Mornings intake form
378	5/2/2024	AIN	0.130	\$196.00	\$25.48	EPSDT		Draft and send email to care manager re PCP appointment and referral to ABA (6 min); message ZSF re same (2 min)
379	5/9/2024	AIN	0.517	\$196.00	\$101.33	EPSDT		Call w parent re PCP appointment and ABA/OT services (11 min); correspond w ZSF re same (5 min); draft and send email to T. Reed-Countee re ABA (1.5 min); call Better Mornings re services (2 min); draft and send email to parent re same (11.5 min)
380	5/13/2024	AIN	0.020	\$196.00	\$3.92	EPSDT		Call Better Mornings and leave voicemail
381	6/24/2024	AIN	0.020	\$196.00	\$3.92	EPSDT		Call and leave voicemail for parent re OT/therapy services and referral for depression treatment
382	6/27/2024	AIN	0.409	\$196.00	\$80.16	EPSDT		T/c to parent re OT, therapy, and ABA services (13 min); draft email to care manager re outreach to therapy providers (11 min)
383	4/10/2024	ZSF	0.198	\$196.00	\$38.81	EPSDT		Review AIN email to HSCSN re follow up inquiry re case manager, AIN email to parent re intake for core service agency, and email to care manager requesting assistance
384	4/15/2024	ZSF	0.253	\$196.00	\$49.59	EPSDT		Read HSCSN care manager response to request for assistance with OT and provide guidance to AIN to follow up re OT and assistance with other outstanding services
385	4/17/2024	ZSF	0.054	\$196.00	\$10.58	EPSDT		Review AIN email to HSCSN requesting assistance for OT services

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386	5/2/2024	ZSF	0.228	\$196.00	\$44.69	EPSDT		Review AIN response to HSCSN care manager re care coordination re OT services (5 min); instructions to AIN re addressing ongoing need for mental health services (8 min.)
387	5/9/2024	ZSF	0.132	\$196.00	\$25.87	EPSDT		Confer w AIN re follow up with HSCSN re procedures for authorization for change in scope of services

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Matter: DW, a minor								
388	4/5/2024	ATH	0.660	\$196.00	\$129.36	EPSDT		Create agenda and attend weekly meeting with ZSF, HSCSN
389	4/18/2024	ATH	0.398	\$196.00	\$78.01	EPSDT		Draft agenda for standing meeting, call with parent to get updates for agenda (5 minutes), update phone notes
390	4/19/2024	ATH	0.873	\$196.00	\$171.11	EPSDT		Call to parent, weekly standing meeting with parent, Bayer, King-Williams
391	4/25/2024	ATH	0.306	\$196.00	\$59.98	EPSDT		Draft agenda for weekly standing meeting
392	4/26/2024	ATH	0.379	\$196.00	\$74.28	EPSDT		Weekly Standing Meeting with ZSF, parent, HSCSN
393	5/1/2024	ATH	1.148	\$196.00	\$225.01	EPSDT		Call with parent to give updates from last week's meeting with HSCSN, ask to sign reimbursement docs (14 min), update phone notes, follow up with ZSF and parent over email
394	5/2/2024	ATH	0.343	\$196.00	\$67.23	EPSDT		Draft agenda for weekly standing meeting
395	5/3/2024	ATH	0.973	\$196.00	\$190.71	EPSDT		Weekly standing meeting with ZSF, King-Williams, parent
396	5/9/2024	ATH	0.152	\$196.00	\$29.79	EPSDT		Draft agenda for weekly updates for HSCSN / parent
397	5/15/2024	ATH	0.375	\$196.00	\$73.50	EPSDT		Update reimb request with new forms and information
398	5/17/2024	ATH	0.577	\$196.00	\$113.09	EPSDT		Weekly Standing Meeting with ZSF, HSCSN, and parent
399	5/23/2024	ATH	0.268	\$196.00	\$52.53	EPSDT		Draft agenda for weekly meeting
400	5/30/2024	ATH	0.188	\$196.00	\$36.85	EPSDT		Draft agenda for weekly meeting with HSCSN
401	5/31/2024	ATH	0.973	\$196.00	\$190.71	EPSDT		Weekly Standing Meeting with HSCSN, parent, ZSF
402	6/4/2024	ATH	0.124	\$196.00	\$24.30	EPSDT		Call to parent re: receipts and general check in
403	6/6/2024	ATH	0.251	\$196.00	\$49.20	EPSDT		Draft agenda for standing meeting
404	6/14/2024	ATH	0.761	\$196.00	\$149.16	EPSDT		Draft standing meeting agenda (19 min); attend standing meeting
405	6/20/2024	ATH	0.223	\$196.00	\$43.71	EPSDT		Call to parent and draft of agenda for weekly standing meeting
406	6/21/2024	ATH	0.412	\$196.00	\$80.75	EPSDT		Call with parent (8 min), draft communications to HSCSN re: PT authorization frequency
407	6/26/2024	ATH	0.411	\$196.00	\$80.56	EPSDT		Call parent re: sign updated admin doc and LPN issues, draft communications to ZSF

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
408	6/27/2024	ATH	0.340	\$196.00	\$66.64	EPSDT		Draft agenda for DW standing meeting
409	6/28/2024	ATH	0.883	\$196.00	\$173.07	EPSDT		Weekly standing meeting with ZSF, HSCSN, parent
410	4/2/2024	ZSF	0.110	\$196.00	\$21.56	EPSDT		Review email updates from HSCSN re status of durable medical equipment and tel notes of weekly meeting
411	4/5/2024	ZSF	0.474	\$196.00	\$92.90	EPSDT		Weekly meeting re outstanding services pursuant to settlement agreement
412	4/9/2024	ZSF	0.046	\$196.00	\$9.02	EPSDT		Read email from HSCSN re durable medical equipment supplier
413	4/10/2024	ZSF	0.034	\$196.00	\$6.66	EPSDT		Review ATH email to HSCSN requesting copy of denial notice
414	4/11/2024	ZSF	0.015	\$196.00	\$2.94	EPSDT		Review ATH draft agenda for weekly meeting with HSCSN re outstanding services and supplies
415	4/12/2024	ZSF	0.047	\$196.00	\$9.21	EPSDT		Read HSCSN email update re status of outstanding services
416	4/19/2024	ZSF	0.092	\$196.00	\$18.03	EPSDT		Read email update from ATH re issues with PT services, PCA services, and related HSCSN response
417	4/25/2024	ZSF	0.090	\$196.00	\$17.64	EPSDT		Edit and send agenda to HSCSN re weekly meeting re outstanding services
418	4/26/2024	ZSF	0.030	\$196.00	\$5.88	EPSDT		Email with parent and ATH re administrative documents and next steps
419	4/26/2024	ZSF	0.550	\$196.00	\$107.80	EPSDT		Participate in weekly meeting per agreement with HSCSN, ATH, re status of outstanding services
420	5/2/2024	ZSF	0.168	\$196.00	\$32.93	EPSDT		Review ATH email to parent re medical supply provider choice to address issues of non compliance and agenda email for weekly meeting re outstanding issues
421	5/3/2024	ZSF	0.953	\$196.00	\$186.79	EPSDT		Participate in weekly meeting re status of outstanding services, supplies and out of pocket expenses
422	5/9/2024	ZSF	0.067	\$196.00	\$13.13	EPSDT		Review agenda email for list of email discussions re status of services
423	5/14/2024	ZSF	0.129	\$196.00	\$25.28	EPSDT		Review updates from HSCSN and parent re status of outstanding therapy and incontinence supplies
424	5/16/2024	ZSF	0.057	\$196.00	\$11.17	EPSDT		Review ATH draft agenda re outstanding items in preparation for regular meeting with HSCSN per agreement

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
425	5/17/2024	ZSF	0.581	\$196.00	\$113.88	EPSDT		Participate in biweekly care coordination meeting with HSCSN re outstanding service, equipment, and supplies
426	5/20/2024	ZSF	0.051	\$196.00	\$10.00	EPSDT		Read email from HSCSN re AAC device and evaluation authorization and delay
427	5/21/2024	ZSF	0.016	\$196.00	\$3.14	EPSDT		Review HSCSN email re status of requested AAC device
428	5/23/2024	ZSF	0.103	\$196.00	\$20.19	EPSDT		Review draft agenda of outstanding services
429	5/24/2024	ZSF	0.063	\$196.00	\$12.35	EPSDT		Read and respond to HSCSN update on status of ongoing search for PT provider and orders from PCP for aqua services still pending
430	5/30/2024	ZSF	0.021	\$196.00	\$4.12	EPSDT		Edit proposed agenda for tomorrows bimonthly standing meeting w HSCSN re outstanding services for DW
431	5/31/2024	ZSF	0.973	\$196.00	\$190.71	EPSDT		Represent DW at bimonthly standing meeting w HSCSN re outstanding services and supplies
432	6/6/2024	ZSF	0.090	\$196.00	\$17.64	EPSDT		Review ATH proposed agenda of outstanding items
433	6/11/2024	ZSF	0.023	\$196.00	\$4.51	EPSDT		Read HSCSN email updates re status of remaining outstanding services and supplies
434	6/17/2024	ZSF	0.093	\$196.00	\$18.23	EPSDT		Read meeting notes from June 14 with HSCSN re outstanding services
435	6/20/2024	ZSF	0.030	\$196.00	\$5.88	EPSDT		Review ATH draft agenda to HSCSN re status of outstanding items
436	6/28/2024	ZSF	0.870	\$196.00	\$170.52	EPSDT		Meeting with HSCSN, ATH and parent re status of outstanding services
437	4/18/2024	AIN	0.616	\$196.00	\$120.74	Reimbursement		Proof and cite-check sworn statement
438	4/4/2024	ATH	0.491	\$196.00	\$96.24	Reimbursement		work on DW reimbursement
439	4/10/2024	ATH	0.323	\$196.00	\$63.31	Reimbursement		Call with parent, drafting correspondence to HSCSN about prescriptions / medical necessity
440	4/15/2024	ATH	0.734	\$196.00	\$143.86	Reimbursement		Call to parent re: reimbursement / Rx for gloves from Dr. Dawes, draft communications to HSCSN / Dr. Dawes re: Rx for gloves, edit reimbursement request / related documents

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
441	4/16/2024	ATH	0.149	\$196.00	\$29.20	Reimbursement		Call to parent re: Rx for gloves for reimbursement request, updating phone notes
442	4/17/2024	ATH	1.777	\$196.00	\$348.29	Reimbursement		Edit sworn statement and make relevant exhibits
443	4/18/2024	ATH	1.599	\$196.00	\$313.40	Reimbursement		Prepare documents for editing by KLM, follow up with parent re: signing documents
444	4/22/2024	ATH	0.283	\$196.00	\$55.47	Reimbursement		Call to parent re signing forms, draft communications re updated forms
445	4/24/2024	ATH	0.240	\$196.00	\$47.04	Reimbursement		Call to parent, update phone notes / admin docs for signature
446	4/25/2024	ATH	0.033	\$196.00	\$6.47	Reimbursement		Call to parent re: reimbursement
447	5/16/2024	ATH	0.583	\$196.00	\$114.27	Reimbursement		Check receipt for legibility and improve, draft communications and send requested reimb documents to HSCSN, draft agenda for standing meeting
448	6/3/2024	ATH	0.027	\$196.00	\$5.29	Reimbursement		Call to parent re: sending documents for reimbursement request to HSCSN
449	6/5/2024	ATH	0.187	\$196.00	\$36.65	Reimbursement		Calls to parent / voicemail trying to get in touch re: receipts for reimbursement
450	6/18/2024	ATH	0.209	\$196.00	\$40.96	Reimbursement		Communications with parent re: reimbursement request and proper documentation of expenses / claims worksheet
451	6/25/2024	ATH	2.874	\$196.00	\$563.30	Reimbursement		Draft DW reimbursement re: medical supplies
452	6/26/2024	ATH	0.225	\$196.00	\$44.10	Reimbursement		Review of ZSF edits
453	6/27/2024	ATH	0.188	\$196.00	\$36.85	Reimbursement		Call to parent to confirm details in reimb
454	4/18/2024	DAP	0.050	\$196.00	\$9.80	Reimbursement		Request e-signatures for sworn statement and worksheet from parent
455	4/24/2024	DAP	0.067	\$196.00	\$13.13	Reimbursement		Send reimbursement sworn statement and claim worksheet to parent for e-signature
456	4/18/2024	KLM	1.325	\$196.00	\$259.70	Reimbursement		Review and edit sworn statement and claims worksheet
457	6/27/2024	KLM	0.749	\$196.00	\$146.80	Reimbursement		Review and edit sworn statement in support of reimbursement claim

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458	4/9/2024	ZSF	0.522	\$196.00	\$102.31	Reimbursement		Work with ATH to determine details of claim and instructions re follow up contact with parent and PCP to obtain supporting documentation
459	4/19/2024	ZSF	0.023	\$196.00	\$4.51	Reimbursement		Confer w ATH re finalizing reimbursement claim and communications with parent re same
460	4/22/2024	ZSF	0.049	\$196.00	\$9.60	Reimbursement		Confer w ATH re status of parent review of claim
461	5/14/2024	ZSF	0.207	\$196.00	\$40.57	Reimbursement		Read HSCSN care navigation request for additional information (2 min.); review claim submitted and provide ATH with instructions to address HSCSN requests (10 min.)
462	5/15/2024	ZSF	0.125	\$196.00	\$24.50	Reimbursement		Instructions to ATH re response to HSCSN for additional information on request for information
463	5/20/2024	ZSF	0.030	\$196.00	\$5.88	Reimbursement		Read email from HSCSN care navigation re receipt of reimbursement claim for out of pocket expenses
464	6/26/2024	ZSF	0.155	\$196.00	\$30.38	Reimbursement		Read and respond to email from ATH re ongoing issues with nurse, ways to address, and administrative barriers from HSC Pediatrics
465	6/26/2024	ZSF	0.558	\$196.00	\$109.37	Reimbursement		Review reimbursement claim for incontinence products not provided by HSCSN

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Matter: EC2, a minor								
466	4/10/2024	AIN	0.648	\$196.00	\$127.01	EPSDT		Draft 10-day letter
467	4/18/2024	AIN	0.035	\$196.00	\$6.86	EPSDT		10 day letter
468	4/19/2024	AIN	0.100	\$196.00	\$19.60	EPSDT		Send 10-day letter to KLM for review (2 min); review KLM edits and send to ATH for proofing (4 min)
469	4/30/2024	AIN	0.420	\$196.00	\$82.32	EPSDT		Prepare for sending and send out closing letter (21.5 min); draft and send email re closing letter to parent (3.5 min)
470	5/3/2024	AIN	0.044	\$196.00	\$8.62	EPSDT		Draft email to parent re updates on EC2 nursing services
471	6/21/2024	AIN	0.077	\$196.00	\$15.09	EPSDT		Contact parent re nursing hours
472	6/26/2024	AIN	0.087	\$196.00	\$17.05	EPSDT		Draft email to parent re nursing coverage gap
473	6/27/2024	AIN	0.280	\$196.00	\$54.88	EPSDT		Draft email to HSCSN re nursing coverage (15 min); call parent re CM name (2 min)
474	4/19/2024	ATH	0.076	\$196.00	\$14.90	EPSDT		Proof of closing letter for AIN
475	4/19/2024	KLM	0.071	\$196.00	\$13.92	EPSDT		Review and edit letter to client
476	4/10/2024	ZSF	0.271	\$196.00	\$53.12	EPSDT		Review letter to client re need for ongoing TPM assistance
477	6/26/2024	ZSF	0.050	\$196.00	\$9.80	EPSDT		Review AIN email to parent re ongoing shortage and quality issues re nursing services
478	6/27/2024	ZSF	0.413	\$196.00	\$80.95	EPSDT		Review and edit AIN email to HSCSN re quality of HSCSN services

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: EC3, a minor								
479	4/23/2024	ACA	0.330	\$196.00	\$64.68	EPSDT		Review and consider email from parent re services and reimbursement and instructions to paralegal re same
480	5/22/2024	ACA	0.300	\$196.00	\$58.80	EPSDT		Review and edit correspondence to client
481	6/13/2024	ACA	0.330	\$196.00	\$64.68	EPSDT		Meet with team re status of services and reimbursement claim issues
482	6/20/2024	ACA	0.250	\$196.00	\$49.00	EPSDT		Memo re status of issues to AH
483	6/24/2024	ACA	0.350	\$196.00	\$68.60	EPSDT		Review file and talk with AN re necessary nursing services and next steps
484	6/27/2024	ACA	1.280	\$196.00	\$250.88	EPSDT		Talk with ZSF re reimb claim issues (24 min); edit draft claim and memo to KLM re same (53 min)
485	4/10/2024	AIN	0.020	\$196.00	\$3.92	EPSDT		Attempt to call parent and leave voicemail
486	4/11/2024	AIN	0.126	\$196.00	\$24.70	EPSDT		Draft email to parent re HSCSN and provider search
487	4/17/2024	AIN	0.046	\$196.00	\$9.02	EPSDT		Forward draft email to ACA and send to parent
488	4/19/2024	AIN	0.230	\$196.00	\$45.08	EPSDT		Tel call w parent re outreach from HSCSN and service updates
489	4/22/2024	AIN	0.400	\$196.00	\$78.40	EPSDT		Update ACA on client status (4 min); draft email to HSCSN re lack of care management and ophthalmologist (14 min); review ACA edits to and send email to A. Bayer (6 min)
490	5/3/2024	AIN	0.080	\$196.00	\$15.68	EPSDT		Review email from A. Bayer (2 min); update ACA re status of services and ask next steps (3 min)
491	5/10/2024	AIN	0.150	\$196.00	\$29.40	EPSDT		Draft and send email to parent re REIMB information and art therapy (5 min); draft and send response re same (4 min)
492	5/16/2024	AIN	0.417	\$196.00	\$81.73	EPSDT		Draft and send email to [REDACTED] re medicaid ID number (2.5 min); call Magellan line to confirm EC3 eligibility dates (13.5 min); update ACA re case status pre-MC meeting (6 min); draft and send email to parent re art and aquatherapy (3.5 min)
493	5/17/2024	AIN	0.275	\$196.00	\$53.90	EPSDT		Review phone notes (2.5 min); draft and send email to parent re OT receipts, meeting about REIMB request, and aquatherapy (14 min)
494	5/22/2024	AIN	0.230	\$196.00	\$45.08	EPSDT		T/c w parent re REIMB questions and aquatherapy

Matter: EC3, a minor

Monday, September 23, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
495	5/28/2024	AIN	0.179	\$196.00	\$35.08	EPSDT		Pass off REIMB task to ATH
496	5/29/2024	AIN	0.231	\$196.00	\$45.28	EPSDT		Pass off REIMB task to ATH
497	6/24/2024	AIN	1.883	\$196.00	\$369.07	EPSDT		Call parent re nursing services (6 min); draft email to care manager re EC3 need for post op nursing support (20 min); edit phone notes (1 min); discuss situation w ACA (2 min); edit draft email (9 min); work on sworn statement and exhibits (1 hr 15 min)
498	6/26/2024	AIN	0.233	\$196.00	\$45.67	EPSDT		Review emails (3 min); email N. Young re case agreements (4 min); call parent re order for nursing and timeline (4 min); email parent requesting copy of communication w HSCSN re nursing (2 min)
499	6/27/2024	AIN	0.576	\$196.00	\$112.90	EPSDT		Discuss REIMB w ACA (8 min); prepare sworn statement and exhibits for paralegal proof/cite-check (5 min); review ATH edits (3 min); prepare and request parent signature on REIMB claim forms
500	6/28/2024	AIN	1.042	\$196.00	\$204.23	EPSDT		Edit claims sheet and REIMB request (8 min); prepare updated forms for submission and signature (10 min); leave voicemail to parent re signature request (1 min); answer t/c from parent re documents (4.5 min); leave voicemail for parent asking for signature again (1 min); answer t/c from parent (26 min); discuss situation w ZSF (12 min)
501	5/29/2024	ATH	0.422	\$196.00	\$82.71	EPSDT		Review phone notes, work on reimbursement claim re: OT appointments
502	6/24/2024	ACA	0.500	\$196.00	\$98.00	Reimbursement		Review reimb claim sworn statement and attachments and memo to AN re same (.5)
503	6/26/2024	ACA	1.050	\$196.00	\$205.80	Reimbursement		Review and consider KLM comments and edits to reimbursement claim documents (21 min); review files re claim issues and email ZSF re same (42 min)
504	5/15/2024	AIN	0.186	\$196.00	\$36.46	Reimbursement		Begin drafting reimbursement claim
505	5/16/2024	AIN	1.000	\$196.00	\$196.00	Reimbursement		Ask ACA re REIMB claim (6 min); ask ZSF re EC3 REIMB claim (2 min); work on REIMB request (52 min)
506	6/17/2024	AIN	0.774	\$196.00	\$151.70	Reimbursement		Work on reimbursement claim
507	6/20/2024	AIN	0.164	\$196.00	\$32.14	Reimbursement		Work on reimbursement claim

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
508	6/21/2024	AIN	0.645	\$196.00	\$126.42	Reimbursement		Create exhibits for reimbursement claim
509	6/25/2024	AIN	0.460	\$196.00	\$90.16	Reimbursement		Work on reimbursement and adjust exhibits
510	6/12/2024	ATH	2.005	\$196.00	\$392.98	Reimbursement		Work on parent reimbursement request for SLP, OT, PT; call to parent (17 min)
511	6/13/2024	ATH	0.211	\$196.00	\$41.36	Reimbursement		Draft reimbursement request for therapy copays
512	6/14/2024	ATH	0.740	\$196.00	\$145.04	Reimbursement		Drafting reimbursement request
513	6/17/2024	ATH	0.434	\$196.00	\$85.06	Reimbursement		Draft reimbursement request and communicate developments to AIN
514	6/27/2024	ATH	0.347	\$196.00	\$68.01	Reimbursement		Proof and cite check of reimbursement
515	6/25/2024	KLM	0.484	\$196.00	\$94.86	Reimbursement		Review and edit sworn statement in support of reimbursement claim
516	6/27/2024	KLM	0.432	\$196.00	\$84.67	Reimbursement		Review and edit updates to the sworn statement in support of reimbursement claim
517	6/12/2024	ZSF	0.073	\$196.00	\$14.31	Reimbursement		Read and respond to inquiry from ACA re denial of out of state nursing services
518	6/27/2024	ZSF	0.395	\$196.00	\$77.42	Reimbursement		Confer with ACA re reimbursement claim
519	6/28/2024	ZSF	0.130	\$196.00	\$25.48	Reimbursement		Review AIN email submission of claim to HSCSN
520	4/18/2024	ACA	0.230	\$196.00	\$45.08	Recertification		Confer with TPM team re status of services and care management issues
521	5/16/2024	ACA	0.250	\$196.00	\$49.00	Recertification		Confer with TPM team re status of services and care management issues
522	6/12/2024	ACA	1.150	\$196.00	\$225.40	Recertification		Review and respond to email re status of recertification and need for services (.4); correspond with paralegals re same and next steps (.5); email ZSF re needed nursing services and consider response (.25)

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: Gibson, A.								
523	5/29/2024	ATH	0.244	\$196.00	\$47.82	Recertification		Proof of [REDACTED] closing letter for DAP
524	5/1/2024	DAP	0.400	\$196.00	\$78.40	Recertification		Draft closing letter
525	5/28/2024	DAP	0.501	\$196.00	\$98.20	Recertification		Review ZSF edits to closing letter
526	5/29/2024	DAP	0.600	\$196.00	\$117.60	Recertification		Review KLM edits to closing letter (3 min); review ATH proof and prepare letter for mailing (33 min)
527	5/29/2024	KLM	0.116	\$196.00	\$22.74	Recertification		Review and edit letter to client
528	5/1/2024	ZSF	0.114	\$196.00	\$22.34	Recertification		Review and edit closing letter to client
529	5/28/2024	ZSF	0.317	\$196.00	\$62.13	Recertification		Edit closing letter

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Matter: JH, a minor								
530	5/2/2024	ATH	0.170	\$196.00	\$33.32	EPSDT		Draft power of medical attorney documents
531	4/19/2024	ZSF	0.113	\$196.00	\$22.15	EPSDT		Tel call w parent re need for power of attorney (5 min); instructions to ATH re drafting POA (6 min.)
532	5/7/2024	ZSF	0.053	\$196.00	\$10.39	EPSDT		Review medical power of attorney

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: JL, JL2, KD-J, minors								
533	4/16/2024	DAP	0.117	\$196.00	\$22.93	EPSDT		Email parent re outstanding services
534	5/1/2024	DAP	1.267	\$196.00	\$248.33	EPSDT		Call w/ parent re outstanding issues and ABA services
535	5/10/2024	DAP	0.033	\$196.00	\$6.47	EPSDT		Attempt to call parent and leave voicemail
536	5/23/2024	DAP	0.200	\$196.00	\$39.20	EPSDT		Draft email to CM re provision of incontinence supplies, helmet, and dental services
537	5/29/2024	DAP	0.350	\$196.00	\$68.60	EPSDT		Call [REDACTED] for updates and schedule call (3 min); call w/ [REDACTED] re updates and next steps for services for all children (18 min)
538	5/31/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Review email with updates on services from Care Manager
539	6/6/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Email parent re helmet appointment
540	6/7/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Email reply to parent re helmet appointment
541	6/13/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Attempt to call [REDACTED] re availability for helmet appointments, leave voicemail
542	6/17/2024	DAP	0.133	\$196.00	\$26.07	EPSDT		Email CM King-Williams and parent re outstanding services
543	6/26/2024	DAP	0.734	\$196.00	\$143.86	EPSDT		Draft email to CM King-Williams
544	6/26/2024	DAP	2.300	\$196.00	\$450.80	EPSDT		Update HIPAA forms for JL, JL-2, KD-J, and LJ (29 min); prepare for signing and send to parent (10 min); call w/ parent re outstanding services (53 min); email CM King-Williams listing five outstanding issues regarding services for JL, JL-2, KD-J, and LJ (46 min)
545	6/28/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Review email reply from CM King-Williams re outstanding services
546	5/23/2024	ZSF	0.070	\$196.00	\$13.72	EPSDT		Review email to HSCSN re status of helmet and therapy services (2 min.); read HSCSN response (2 min.)
547	5/31/2024	ZSF	0.055	\$196.00	\$10.78	EPSDT		Review HSCSN updates re status of dental visits, helmet request, and incontinence supplies delivery
548	6/6/2024	ZSF	0.036	\$196.00	\$7.06	EPSDT		Review DAP email to parent re status of protective helmet requested for self-injurious behaviors

Matter: JL, JL2, KD-J, minors

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549	6/17/2024	ZSF	0.146	\$196.00	\$28.62	EPSDT		Review DAP follow up email to HSCSN re status of outstanding supplies and assistance with scheduling medical appointments and HSCSN responsive emails
550	6/26/2024	ZSF	0.175	\$196.00	\$34.30	EPSDT		Review updated HIPAAs (5 min.); review DAP email to HSCSN re outstanding items and supplies (5 min.)
551	6/28/2024	ZSF	0.173	\$196.00	\$33.91	EPSDT		Read HSCSN email response to questions re status of various services, supplies and appointments

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Matter: JY, a minor								
552	4/10/2024	AIN	0.280	\$196.00	\$54.88	EPSDT		Review emails (2.5 min); call parent re reimbursement and HSCSN (9 min); update ZSF and ask re parent's questions (5.5 min)
553	4/11/2024	AIN	0.041	\$196.00	\$8.04	EPSDT		Begin drafting note re transfer of custody
554	4/18/2024	AIN	0.425	\$196.00	\$83.30	EPSDT		Draft email to Y. Kamara re Vyvanse/custody change and scheduling meeting with providers (10 min); draft and send email to C. Sonosky re alerting DC Medicaid to custody change (7.5 min); answer tel call from C. Sonosky re same and record call notes in call log (8 min)
555	4/19/2024	AIN	0.400	\$196.00	\$78.40	EPSDT		Work on letter for JY birthmother re representation of JY (21 min); answer t/c from parent re attendance of birth mother at possible MDT meeting (2 min); update ZSF re same (1 min)
556	4/22/2024	AIN	0.150	\$196.00	\$29.40	EPSDT		Answer tel call from parent re participation in MDT meeting
557	4/23/2024	AIN	0.150	\$196.00	\$29.40	EPSDT		Email Y. Kamara re setting up MDT meeting (3.5 min); answer tel call from HSCSN re MDT meeting (3 min); call parent re availability (2.5 min)
558	4/25/2024	AIN	0.200	\$196.00	\$39.20	EPSDT		Review ZSF availability for meeting (3 min); call parent to discuss birth mom attendance at meeting and new availability (9 min)
559	4/26/2024	AIN	0.050	\$196.00	\$9.80	EPSDT		Answer call from HSCSN re availability for MDT meeting
560	5/1/2024	AIN	1.133	\$196.00	\$222.07	EPSDT		Answer call from M. Alaka re MDT meeting (2 min); add invite to calendar (2 min); answer call from parent re attendance of birth mother (1 min); call M. Alaka re same (2 min); attempt to call parent and leave voicemail (1 min); call parent re same (6.5 min); talk to ZSF re parent's concerns (6 min); call parent re scheduling meeting w ZSF (1.5 min); create meeting and invite btwn parent and ZSF (3 min); draft letter to birth mom (43 min)
561	5/2/2024	AIN	0.434	\$196.00	\$85.06	EPSDT		Enter phone notes (6 min)
562	5/3/2024	AIN	1.104	\$196.00	\$216.38	EPSDT		Work on letter to birth mother explaining representation
563	5/7/2024	AIN	1.161	\$196.00	\$227.56	EPSDT		Review ZSF edits to letter (5 min); meet w/ ZSF and parent re upcoming transfer of care meeting (55 min); review and clean up phone notes (9.5 min); call HSCSN re care manager info (

Matter: JY, a minor

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564	5/8/2024	AIN	0.320	\$196.00	\$62.72	EPSDT		Review emails (1.5 min); look for Dr. People's contact information (2 min); call Dr. People's office re prior authorization (5.5 min); update ZSF re same (1 min); add to phone notes (1 min); answer t/c from M. Alaka re pre-MDT meeting (4 min); call parent re same (2.5 min); leave voicemail for M. Alaka re same (1.5 min)
565	5/14/2024	AIN	0.175	\$196.00	\$34.30	EPSDT		Tel call w/ M. Alaka re custody order and status of MDT meeting (3.5 min); add to phone notes (2 min); update ZSF re same (2 min); draft and send email to M. Alaka and JY care manager re custody order (3 min)
566	5/15/2024	AIN	1.170	\$196.00	\$229.32	EPSDT		Meet w parent, birth mother, HSCSN, and ZSF re JY providers (1 hr 4 min); discuss next meeting and letter to birth mom w ZSF (6 min)
567	5/16/2024	AIN	0.550	\$196.00	\$107.80	EPSDT		Ask KLM/JAD re status of letter to birth mom (4 min); draft email to M. Alaka re planning second MDT meeting (17 min); review JAD and KLM edits to letter (12 min)
568	5/17/2024	AIN	1.956	\$196.00	\$383.38	EPSDT		Edit draft and send email to M. Alaka re planning follow-up MDT meeting (3 min); ask ZSF re KLM suggestions for birth letter (3 min); answer t/c from C. Gee re continuation of legal services for JY (5 min); ask ZSF re birth mom address and draft and send email to parent re birth mom address (6 min); edit letter for readability (1 hr 40 min)
569	5/20/2024	AIN	0.375	\$196.00	\$73.50	EPSDT		Set up MDT meeting (5 min); draft and send email to M. Alaka re same (1.5 min); draft email to parent re testing closed captions (1.5 min); answer t/c from parent re JY injury (9.5 min); ask ZSF about next steps re same (5 min)
570	5/21/2024	AIN	2.400	\$196.00	\$470.40	EPSDT		Draft email to [REDACTED] re testing closed captions (2 min); discuss plan for meeting w ZSF (2 min); draft and send email to HSCSN re JY injuries and meeting status (17 min); answer t/c from [REDACTED] re test meeting (1 min); test closed captions w/ [REDACTED] (2 min); answer t/c from parent re JY updates (27.5 min); call ZSF re same (10 min); draft email to J. Brown from CPS describing situation and our requests (24.5 min); call parent to clarify details (13 min); edit draft email to J. Brown (7 min); call w KLM and ZSF re same (15 min); call parent to further clarify events (5 min); further edit draft email to J. Brown (18 min)

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571	5/22/2024	AIN	1.592	\$196.00	\$312.03	EPSDT		Review and forward email from CPS counsel (2 min); t/c from parent re updates (5 min); add phone notes (2 min); ask ZSF about situation (15 min); draft email to HSCSN re addressing JY injuries in MDT meeting (22.5 min); leave parent a voicemail re updates (1.5 min); t/c w parent re same (5.5 min); t/c w parent and ZSF (17.5 min); research and compile list of pro-bono family lawyers in DC and send to parent (29.5 min)
572	5/23/2024	AIN	1.830	\$196.00	\$358.68	EPSDT		Draft and send email to providers re meeting focus shift (21 min); meet w ZSF, HSCSN, parent, [REDACTED] re care transition (1 hr 22 min); clean up meeting notes (7 min)
573	5/28/2024	AIN	0.475	\$196.00	\$93.10	EPSDT		T/c w parent re events summary and call w ZSF (4 min); draft email to parent summarizing events (21 min); review ZSF email edits and send to parent (3.5 min)
574	6/17/2024	AIN	0.499	\$196.00	\$97.80	EPSDT		Call parent re updates on JY situation
575	6/18/2024	AIN	0.530	\$196.00	\$103.88	EPSDT		Update ZSF re JY situation (9.5 min); draft email to parent re ZSF recommendation (22.5 min)
576	6/21/2024	AIN	0.450	\$196.00	\$88.20	EPSDT		Call and leave voicemail for parent (1 min); t/c w parent re JY status (19.5 min); update ZSF re situation (5.5 min)
577	6/24/2024	AIN	0.670	\$196.00	\$131.32	EPSDT		Talk w parent and ZSF re situation (10 min); work on letter to parent re care transition meetings with birth mother (30 min)
578	6/25/2024	AIN	0.988	\$196.00	\$193.65	EPSDT		Call DC Superior Court and Judge Wellner's chambers re attending custody hearing virtually (12 min); draft letter re care transition meetings w birth mother (47.5 min)
579	6/26/2024	AIN	1.385	\$196.00	\$271.46	EPSDT		Attempt to call parent and voicemail re care transition meeting letter (1.5 min); work on letter (1 hr 12 min); answer t/c from parent re letter and hearing (9.5 min)
580	6/28/2024	AIN	0.510	\$196.00	\$99.96	EPSDT		Draft and send email to parent re care transition meetings recap letter (4 min); draft and send email to providers re change in custody situation (21.5 min)
581	5/17/2024	ATH	0.185	\$196.00	\$36.26	EPSDT		Review of letter to JY birth mother for readability for AIN
582	5/21/2024	KLM	0.250	\$196.00	\$49.00	EPSDT		Confer with ZSF and AIN re issues on JY's health and wellbeing
583	4/5/2024	ZSF	0.319	\$196.00	\$62.52	EPSDT		Tel call with parent re lack of care management during crisis mode and email communications with HSCSN re same

Matter: JY, a minor

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584	4/10/2024	ZSF	0.195	\$196.00	\$38.22	EPSDT		Instructions to AIN how to proceed with care coordination and management during transition to new guardian
585	4/11/2024	ZSF	0.060	\$196.00	\$11.76	EPSDT		Read custody order re transfer of guardianship to birth parent and related medical care coordination
586	4/19/2024	ZSF	0.080	\$196.00	\$15.68	EPSDT		Review and edit email to HSCSN requesting care coordination assistance in anticipation of change of custody
587	4/26/2024	ZSF	0.016	\$196.00	\$3.14	EPSDT		Review AIN email to HSCSN requesting care coordination assistance re provider meeting to discuss needs
588	5/1/2024	ZSF	0.100	\$196.00	\$19.60	EPSDT		Confer with AIN re services and MDT meeting with providers during transition of guardianship
589	5/6/2024	ZSF	1.133	\$196.00	\$222.07	EPSDT		Edit letter to birth mother re continued representation after legal guardianship is transferred
590	5/7/2024	ZSF	2.312	\$196.00	\$453.15	EPSDT		Tel call w parent re agenda for transition meeting (55 min.); email to HSCSN re transition meeting with birth mother and detailed issues to be discussed and addressed (1 hr, 23 min.)
591	5/8/2024	ZSF	0.117	\$196.00	\$22.93	EPSDT		Read and respond to email from HSCSN re MDT meeting (6 min.); instructions to AIN to follow up with provider re need for prior authorization of denied medication (1 min.)
592	5/13/2024	ZSF	1.220	\$196.00	\$239.12	EPSDT		Tel call w HSCSN, AIN, and parent re planning for transition meeting with providers and birth parent
593	5/14/2024	ZSF	0.100	\$196.00	\$19.60	EPSDT		Email to HSCSN re MDT meeting tomorrow and suggested order of providers
594	5/15/2024	ZSF	1.000	\$196.00	\$196.00	EPSDT		Participate in MDT meeting with current guardian and birth mother re JY's care and treatment needs
595	5/20/2024	ZSF	0.461	\$196.00	\$90.36	EPSDT		Read email from care manager re second meeting with birth parent re ongoing EPSDT services (5 min.); confer with AIN re injuries sustained with birth parent (5 min.); tel call with parent re next steps re guaranteeing safety of child (17 min.)

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596	5/21/2024	ZSF	0.602	\$196.00	\$117.99	EPSDT		Edit email to HSCSN re factual developments re meeting with birth mother (5 min.); review Children's ER summary discharge (6 min.); VM from and to parent re next steps re transition to birth parent and health care (2 min); confer w AIN re factual developments and communications with Child Protective Services (19 min); confer with KLM and AIN re addressing abuse and neglect of child (15 min)
597	5/22/2024	ZSF	0.870	\$196.00	\$170.52	EPSDT		Confer with AIN re response from Child Protective Services and our next steps to ensure child's health and safety (15 min.); email w KLM re next steps (9 min.); review email to HSCSN re proposed agenda for MDT meeting with behavioral health providers (2 min.); tel calls to Superior Court (9 min.); tel call to parent re next steps (17 min.)
598	5/23/2024	ZSF	1.530	\$196.00	\$299.88	EPSDT		Review email to health care providers in anticipation of MTD meeting
599	5/28/2024	ZSF	0.725	\$196.00	\$142.10	EPSDT		Tel call with parent re debrief from MDT meeting last week and next steps (29 min); email HSCSN re communications with parent (8 min.); review email to parent from AIN re events of May 17 (6 min.)
600	6/4/2024	ZSF	0.324	\$196.00	\$63.50	EPSDT		Tel call from parent re status of child's wellbeing pending custody transfer
601	6/13/2024	ZSF	0.080	\$196.00	\$15.68	EPSDT		Follow up with caregiver re status of services and child's welfare
602	6/17/2024	ZSF	0.007	\$196.00	\$1.37	EPSDT		Confer w AIN re communications from parent re status of services for JY
603	6/18/2024	ZSF	0.176	\$196.00	\$34.50	EPSDT		Confer w AIN re communications with parent, provider, and HSCSN re next steps re health care needs pending anticipated transition of guardianship (9 min); Review AIN follow up email with parent re same (1 min.)
604	6/21/2024	ZSF	0.069	\$196.00	\$13.52	EPSDT		Confer with AIN re status of transition of guardianship and communications with parent
605	6/24/2024	ZSF	0.190	\$196.00	\$37.24	EPSDT		Tel call w AIN and guardian re transition of guardianship and health care status
606	6/27/2024	ZSF	0.070	\$196.00	\$13.72	EPSDT		Confer w AIN re status of custody and firm's ongoing representation in light of court decision

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Matter: KJ, a minor								
607	5/7/2024	ATH	0.250	\$196.00	\$49.00	EPSDT		Call from [REDACTED] re: denial of therapy services
608	5/9/2024	ATH	0.361	\$196.00	\$70.76	EPSDT		Call to [REDACTED] (3 min), send / prepare admin docs for signature
609	5/15/2024	ATH	1.649	\$196.00	\$323.20	EPSDT		Call with parent and ZSF (50 min), draft follow up communications and review phone notes for details
610	5/28/2024	KLM	0.253	\$196.00	\$49.59	EPSDT		Review and edit materials to support fitness therapy prescribed for child
611	5/31/2024	KLM	0.070	\$196.00	\$13.72	EPSDT		Review and edit email to provider re medical necessity letter
612	5/7/2024	ZSF	0.189	\$196.00	\$37.04	EPSDT		Read tel notes of initial intake with parent re denial of fitness services and provide instructions to ATH re next steps (5 min.); review retainer and HIPAA consents (6 min.)
613	5/9/2024	ZSF	0.111	\$196.00	\$21.76	EPSDT		Confer with ATH re denial of services from HSCSN and additional factual investigation needed
614	5/14/2024	ZSF	0.975	\$196.00	\$191.10	EPSDT		Review tel notes (11 min.), denial and correspondence between parent and HSCSN (27 min.); email parent re factual developments and questions (20 min)
615	5/15/2024	ZSF	1.780	\$196.00	\$348.88	EPSDT		Review emails, background documents and research re fitness services (30 min.); tel call w parent and ATH re denial and steps to address denial with providers (1 hr); follow up with parent re next steps (16 min.)
616	5/16/2024	ZSF	0.120	\$196.00	\$23.52	EPSDT		Read emails from parent re follow up questions (4 min); edit ATH follow up email to parent re next steps re resubmission of previously denied fitness services (3 min)
617	5/20/2024	ZSF	0.018	\$196.00	\$3.53	EPSDT		Review email from parent from last week re next steps
618	5/22/2024	ZSF	0.805	\$196.00	\$157.78	EPSDT		Review letter from parent re need to go out of network (32 min.) and email parent re factual developments (16 min.)
619	5/23/2024	ZSF	2.344	\$196.00	\$459.42	EPSDT		Draft support for new request from parent and PCP for therapeutic fitness services in lieu of appeal
620	5/28/2024	ZSF	0.402	\$196.00	\$78.79	EPSDT		Review and send supporting documentation to parent re therapeutic fitness services

Matter: KJ, a minor

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621	5/30/2024	ZSF	0.135	\$196.00	\$26.46	EPSDT		Read and respond to email from parent re letter of interest from therapeutic physical fitness provider and resubmission of request for authorization of previously denied services
622	5/31/2024	ZSF	0.533	\$196.00	\$104.47	EPSDT		Email communications with pediatrician and parent re resubmission of request for authorization of therapeutic therapy services to HSCSN
623	6/6/2024	ZSF	0.056	\$196.00	\$10.98	EPSDT		Follow up with parent re status of renewed request for authorization of therapeutic fitness services
624	6/10/2024	ZSF	0.025	\$196.00	\$4.90	EPSDT		Read email from provider re anticipated resubmission of updated request for authorization of therapeutic fitness services
625	6/11/2024	ZSF	0.199	\$196.00	\$39.00	EPSDT		Read request to HSCSN from Dr. Dawes for therapeutic fitness services with out of network provider (8 min.); instructions to ATH to track 14 day decision timeline (6 min.)
626	6/24/2024	ATH	0.330	\$196.00	\$64.68	EPSDT MCO Appeal		Review past service denial appeals to prepare for appeal letter
627	6/25/2024	ATH	1.198	\$196.00	\$234.81	EPSDT MCO Appeal		Draft Fitness Therapy Appeal, call with parent (8 minutes)
628	6/26/2024	ATH	1.049	\$196.00	\$205.60	EPSDT MCO Appeal		Draft of HSCSN Fitness Therapy Denial
629	6/27/2024	ATH	1.844	\$196.00	\$361.42	EPSDT MCO Appeal		Draft appeal of denial for fitness therapy; meet with ZSF, JAD, KLM (25 min)
630	6/28/2024	ATH	0.093	\$196.00	\$18.23	EPSDT MCO Appeal		Call to parent re: JAD involvement in case / next steps
631	6/26/2024	JAD	1.470	\$196.00	\$288.12	EPSDT MCO Appeal		Review documents from ZSF re denial of fitness therapy services
632	6/27/2024	JAD	0.400	\$196.00	\$78.40	EPSDT MCO Appeal		Meet with ZSF, KLM, and ATH re taking the appeal for denial of coverage of fitness therapy services
633	6/27/2024	JAD	2.415	\$196.00	\$473.34	EPSDT MCO Appeal		Review documents re denial of fitness therapy services and begin drafting appeal
634	6/28/2024	JAD	4.803	\$196.00	\$941.39	EPSDT MCO Appeal		Draft appeal for denial of coverage of fitness therapy services
635	6/27/2024	KLM	0.420	\$196.00	\$82.32	EPSDT MCO Appeal		Confer with ZSF, JAD, ATH re issues for appeal
636	6/24/2024	ZSF	0.050	\$196.00	\$9.80	EPSDT MCO Appeal		Read HSCSN and email with parent and prescribing provider re appeal
637	6/26/2024	ZSF	0.205	\$196.00	\$40.18	EPSDT MCO Appeal		Provide documentation to JD re appeal

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638	6/27/2024	ZSF	0.937	\$196.00	\$183.65	EPSDT MCO Appeal		Discussion w ATH, JD, and KLM re appeal of denial (24 min.); provide legal support to JC re appeal (32 min.)

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Matter: KM, a minor								
639	5/7/2024	ATH	0.585	\$196.00	\$114.66	EPSDT		Draft admin docs for [REDACTED], call with parent (5 min)
640	4/16/2024	DAP	0.067	\$196.00	\$13.13	Reimbursement		Email parent re reimbursement decisions
641	4/17/2024	DAP	0.133	\$196.00	\$26.07	Reimbursement		Email parent re check from primary insurance
642	4/25/2024	DAP	0.550	\$196.00	\$107.80	Reimbursement		Call w/ parent re reimbursement claim with Aetna and update notes (12 min); call w/ ZSF re next steps for speech therapy claims (15 min); draft email to HSCSN re reimbursement claim 1220 (6 min)
643	4/26/2024	DAP	0.033	\$196.00	\$6.47	Reimbursement		Accept ZSF edit to drafted email and send to care navigation
644	4/29/2024	DAP	0.217	\$196.00	\$42.53	Reimbursement		Review decision letter from HSCSN
645	5/6/2024	DAP	0.200	\$196.00	\$39.20	Reimbursement		Review emails from parent (9 min); call w/ parent re reimbursement appeal (3 min)
646	4/16/2024	ZSF	0.013	\$196.00	\$2.55	Reimbursement		Review DAP email to parent re reimbursement decision
647	4/25/2024	ZSF	0.380	\$196.00	\$74.48	Reimbursement		Confer w DAP re reimbursement claim, coordination of primary insurance payment, delayed HSCSN decision, and follow up w HSCSN (15 min.); edit DAP email to parent re overdue reimbursement decision from HSCSN (8 min)
648	4/26/2024	ZSF	0.028	\$196.00	\$5.49	Reimbursement		Edit DAP email to HSSCN re overdue decision
649	5/2/2024	ZSF	0.068	\$196.00	\$13.33	Reimbursement		Consider appeal of denial
650	5/3/2024	DAP	0.083	\$196.00	\$16.27	MCO Appeal - Reimbursement		Call w/ parent re outstanding EOB and reimbursement appeal

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Matter: LC, a minor								
651	4/5/2024	ACA	2.650	\$196.00	\$519.40	EPSDT		Review and respond to email request from HSCSN and discuss same with DAP and ZSF (.45 hr); review file and represent client in MDT meeting re necessary services (1.2 hr); reseach MST and autism (1 h)
652	4/18/2024	ACA	0.230	\$196.00	\$45.08	EPSDT		Confer with TPM team re status of services and issues
653	4/19/2024	ACA	3.810	\$196.00	\$746.76	EPSDT		Review file and represent LC during MDT re services (1.47 hr); follow-up call with I. Nikolic re: new diagnosis and school coordination (.43 hr); call with [REDACTED] re same (.41 hr); research new diagnosis and necessary interventions (1.5)
654	4/24/2024	ACA	0.330	\$196.00	\$64.68	EPSDT		Review file and memo to paralegal re MDT meeting and agenda
655	5/16/2024	ACA	0.200	\$196.00	\$39.20	EPSDT		Confer with TPM team re status of services and issues
656	5/17/2024	ACA	1.650	\$196.00	\$323.40	EPSDT		Review file and assess issues for MMDT and represent client during MDT (1.25); review and respond email from I. Nikolic re placement and medical needs (.35); call parent re same (.05)
657	6/13/2024	ACA	0.450	\$196.00	\$88.20	EPSDT		Meet with team re status of services and PRTF issues
658	6/13/2024	ACA	2.500	\$196.00	\$490.00	EPSDT		Research autism (1 hr); research recommended necessary services and availability at PRTF (1.5)
659	6/14/2024	ACA	1.200	\$196.00	\$235.20	EPSDT		Review and consider correspondence re medical documentation needed and correspond with ADP re next step (.8); communication with AH re reimburse claims (.4)
660	6/20/2024	ACA	0.250	\$196.00	\$49.00	EPSDT		Memo to ADP re status of issues for meeting
661	4/24/2024	ATH	1.128	\$196.00	\$221.09	EPSDT		Call to Children's and Star Medical re request for client records, draft documents to make new request
662	5/16/2024	ATH	0.279	\$196.00	\$54.68	EPSDT		Prepare authorization for release of Medical information from Childrens
663	6/14/2024	ATH	0.344	\$196.00	\$67.42	EPSDT		Get signed records request form from parent and send to Children's
664	4/5/2024	DAP	1.100	\$196.00	\$215.60	EPSDT		Review email from D. Tucker re rescheduling missed appts. (10 min); schedule conference meeting b/w TPM, parent, and HSCSN (7 min); attend MDT meeting and take notes (49 min)

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665	4/9/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Call w/ parent re ADOS evaluation and scheduling medical appointments
666	4/10/2024	DAP	1.167	\$196.00	\$228.73	EPSDT		Draft email to Mr. Tucker re scheduling medical appointments (2 min); call w/ Mr. Tucker and parent scheduling appointments (1 hr, 5 min); message ACA re appointments scheduled (3 min)
667	4/16/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Email CM Tucker re MDT meetings
668	4/18/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Review incident report from Phillips academy
669	4/24/2024	DAP	0.517	\$196.00	\$101.33	EPSDT		Review ACA emails re Children's National release fax and release form (24 min); review ACA notes from MDT meeting held on 04-19 (4 min); attempt to call parent re appointment at MBI and leave voicemail (3 min)
670	4/25/2024	DAP	0.517	\$196.00	\$101.33	EPSDT		Call w/ parent re updates and autism diagnosis (13 min); email ACA updates from call and update notes (18 min)
671	4/29/2024	DAP	0.150	\$196.00	\$29.40	EPSDT		Email ACA re updated MBI treatment plan
672	4/30/2024	DAP	0.683	\$196.00	\$133.87	EPSDT		Email CM re outstanding appointments/services to be scheduled (14 min); email MBI requesting updated treatment plan (24 min); email CM re MBI therapist contact information (3 min)
673	5/1/2024	DAP	0.133	\$196.00	\$26.07	EPSDT		Review email replies from CM re appointments and therapist info
674	5/3/2024	DAP	0.617	\$196.00	\$120.93	EPSDT		Attend MDT meeting and take notes (31 min); message ACA re updates from MDT meeting (6 min)
675	5/6/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Review emails from OSSE and ACA re safety incident
676	5/7/2024	DAP	0.233	\$196.00	\$45.67	EPSDT		Review emails from CM and parent re appointments (2 min); review emails from OSSE, ACA, and parent re ADOS documents (5 min); review MBI ADOS documents (7 min)
677	5/10/2024	DAP	0.133	\$196.00	\$26.07	EPSDT		Draft email to Ms. Butler at MBI re updated treatment plan
678	5/16/2024	DAP	0.183	\$196.00	\$35.87	EPSDT		Email Ms. Butler at MBI re updated treatment plan (2 min); review responses from Ms. Butler and Mr. Shepard at MBI (6 min); call Mr. Shepard to follow up re document production password and leave voicemail (3 min)

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
679	5/17/2024	DAP	1.050	\$196.00	\$205.80	EPSDT		Attend MDT meeting (50 min); message ACA re next steps and autism conference (10 min); review emails from D. Tucker and M. Ahmed (3 min)
680	5/20/2024	DAP	0.150	\$196.00	\$29.40	EPSDT		Email MBI records re failure to provide password to secure document (3 min); review plan of care from MBI (6 min)
681	5/28/2024	DAP	0.083	\$196.00	\$16.27	EPSDT		Review PRTF determination letters from Hermitage Hall and Woodbourne
682	5/30/2024	DAP	0.083	\$196.00	\$16.27	EPSDT		Message ACA re MC IC meeting and potential assistance for family with securing services
683	5/31/2024	DAP	1.250	\$196.00	\$245.00	EPSDT		Attempt to join MDT meeting (15 min); attend MDT meeting (45 min); edit telephone notes (6 min); email Ms. Butler re psychiatric evaluation (3 min); review email from Ms. Butler re ABA services (6 min)
684	6/4/2024	DAP	0.050	\$196.00	\$9.80	EPSDT		Review email from D. Tucker re ABA evaluation from provider Bright Minds
685	6/5/2024	DAP	0.083	\$196.00	\$16.27	EPSDT		Review emails from ACA and Ms. Butler from MBI re ABA services and PRTF placement
686	6/6/2024	DAP	0.183	\$196.00	\$35.87	EPSDT		Review documents from MBI (5 min); email parent re document production to OSSE (6 min)
687	6/10/2024	DAP	0.067	\$196.00	\$13.13	EPSDT		Review emails from OSSE and Nexus Woodbourne re MTD meeting
688	6/12/2024	DAP	0.133	\$196.00	\$26.07	EPSDT		Research woodbourne facility for ABA/OT services
689	6/14/2024	DAP	1.650	\$196.00	\$323.40	EPSDT		Review emails from OSSE regarding medical documents and residential facility placement (12 min); review documents for medical services in residential facility (9 min); research and develop timeline of ABA referral (28 min); attend MDT meeting (50 min)
690	6/17/2024	DAP	0.917	\$196.00	\$179.73	EPSDT		Email Ms. Butler re ABA therapy providers and provision of services in Maryland (17 min); call w/ Children's Anacostia re medical records (4 min); review necessary documents for PRTF (24 min); email D. Tucker re Medicaid coverage card (4 min); email Children's Anacostia re medical records and annual exam (6 min)

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
691	6/18/2024	DAP	0.167	\$196.00	\$32.73	EPSDT		Call w/ parent re documents and missed appointment (3 min); message ACA re parent request and next steps
692	6/20/2024	DAP	0.100	\$196.00	\$19.60	EPSDT		Draft email to OSSE re documents for residential placement
693	6/21/2024	DAP	0.117	\$196.00	\$22.93	EPSDT		Review email from A. Butler re ABA therapy and PRTF placement (3 min); draft updated HIPAA agreement (4 min)
694	6/24/2024	DAP	0.217	\$196.00	\$42.53	EPSDT		Send parent updated medical HIPAA authorization for signature (4 min); call w/ parent re records and transportation issues (9 min)
695	6/25/2024	DAP	0.150	\$196.00	\$29.40	EPSDT		Review emails from ACA and D. Tucker re unaccompanied minor form and draft email to parent (6 min); email parent form and ACA approved email (3 min)
696	6/26/2024	DAP	0.333	\$196.00	\$65.27	EPSDT		Draft emails to parent, CM Tucker, and OSSE re outstanding documents
697	6/27/2024	DAP	0.333	\$196.00	\$65.27	EPSDT		Review Verida form and email form to CM Tucker (10 min); review LC vaccination record (4 min); send ACA approved drafted emails to CM Tucker re insurance card, parent re other necessary documents, and OSSE re medical records (6 min)
698	6/28/2024	DAP	0.583	\$196.00	\$114.27	EPSDT		Attend MDT meeting (30 min); email parent re physical wellness appointment form (5 min)
699	4/5/2024	ZSF	0.131	\$196.00	\$25.68	EPSDT		Read and respond to ACA email re HSCSN request for assistance with family
700	4/24/2024	ZSF	0.118	\$196.00	\$23.13	EPSDT		Read and respond to emails re issue obtaining requested medical records from Children's
701	5/29/2024	DAP	0.583	\$196.00	\$114.27	EPSDT MCO Grievance		Draft combined grievance re failure to monitor CSAs and provide services

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Matter: LJ, a minor								
702	6/6/2024	ZSF	0.164	\$196.00	\$32.14	EPSDT		Email to DHCF re status of DC Medicaid participation in cell and gene therapy access model
703	4/18/2024	ACA	0.230	\$196.00	\$45.08	Recertification		Confer with TP team re status of recertification and services issues
704	5/16/2024	ACA	0.200	\$196.00	\$39.20	Recertification		Confer with TP team re status of recertification and services issues
705	4/4/2024	AIN	0.580	\$196.00	\$113.68	Recertification		Call parent and leave voicemail re renewal form signature (1 min); draft email to parent re signing (4 min); answer t/c from parent re form and updates (9 min); call Magellan line re eligibility of parent and other LJ household members (6 min); resend renewal form to parent (2 min); summarize and send to ACA parent's updates re renewal (8 min); draft email to C. Sonosky re renewal (5 min)
706	4/5/2024	AIN	0.330	\$196.00	\$64.68	Recertification		Review renewal form sent back by parent (3 min); ask ZSF re and send email to C. Sonosky re renewal (5 min); answer tel call from C. Sonosky re email (11.5 min)
707	4/8/2024	AIN	0.042	\$196.00	\$8.23	Recertification		Check LJ eligibility via Magellan line
708	4/10/2024	AIN	0.100	\$196.00	\$19.60	Recertification		Call Magellan line re LJ eligibility
709	4/12/2024	AIN	0.050	\$196.00	\$9.80	Recertification		Correspond w ACA re update on renewal

Matter: LJ, a minor

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Matter: LM, a minor								
710	6/6/2024	MLH	0.517	\$196.00	\$101.33	EPSDT		Review email from [REDACTED] and file for LM
711	6/7/2024	MLH	0.546	\$196.00	\$107.02	EPSDT		Telephone call with [REDACTED] (0.417 hrs); memo to file (0.129 hrs)
712	6/6/2024	ZSF	0.450	\$196.00	\$88.20	EPSDT		Read and respond to MLH email re advise requested from parent re HSCSN collaboration agreement (10 min); review historical tel notes and CASSIP contract re issue (11 min.); confer w MLH re advise for parent (6 min)

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Matter: MB-S, a minor								
713	6/27/2024	DAP	1.033	\$196.00	\$202.47	EPSDT		MB-S: Review telephone notes and draft retainer, HIPAA, and Appointment of Authorized Representative (47 min); prepare documents for signature and send to parent for e-signature (15 min)
714	6/28/2024	DAP	0.467	\$196.00	\$91.53	EPSDT		Call parent for last signature on admin documents (3 min); review emails forwarded from parent (3 min); review phone notes and reimbursement submission (18 min); review signed admin docs (4 min)
715	5/22/2024	ZSF	0.045	\$196.00	\$8.82	EPSDT		Email with parent re issues obtaining ABA and OT therapy for child seeking assistance
716	6/27/2024	ZSF	0.751	\$196.00	\$147.20	EPSDT		Intake with parent re outstanding EPSDT services (35 min); instructions to DAP re drafting retainer and appt of authorized representative documents (4 min.); review and edit same (6 min.)
717	6/28/2024	ZSF	0.205	\$196.00	\$40.18	EPSDT		Read forwarded emails from parent (4 min); email w DAP re priority of issues to tackle first

Matter: MB-S, a minor

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Matter: MD, a minor								
718	6/21/2024	AIN	0.410	\$196.00	\$80.36	EPSDT		Draft and send email to new CM re dental work needed (22 min); draft and send response to I. Ford (2.5 min)
719	6/26/2024	AIN	0.058	\$196.00	\$11.37	EPSDT		Review emails (2 min); call and leave voicemail to parent re dental services and email from care manager (1.5 min)
720	6/21/2024	ZSF	0.158	\$196.00	\$30.97	EPSDT		Confer w AIN re issues with communications with care manager

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Matter: MS, a minor								
721	4/30/2024	AIN	0.128	\$196.00	\$25.09	EPSDT		Prepare and request signature on case agreements
722	4/4/2024	ATH	0.080	\$196.00	\$15.68	EPSDT		Call to guardianship attorney
723	4/15/2024	ATH	0.393	\$196.00	\$77.03	EPSDT		Call to guardianship attorney re: order, call to parent re: scheduling an MTD meeting
724	4/18/2024	ATH	0.426	\$196.00	\$83.50	EPSDT		Call with guardianship attorney to secure documentation, calls to other providers to confirm contact information
725	4/19/2024	ATH	2.151	\$196.00	\$421.60	EPSDT		Adding guardianship order to iManage, drafting admin docs / case agreements, calls to contacts to set up MDT meeting for MS
726	4/22/2024	ATH	1.480	\$196.00	\$290.08	EPSDT		Draft admin docs and update information
727	4/24/2024	ATH	0.244	\$196.00	\$47.82	EPSDT		Review of ZSF edits of admin docs
728	4/25/2024	ATH	0.396	\$196.00	\$77.62	EPSDT		Call to DDS assistant, and HSCSN CM re: MTD meeting and confirming contact info
729	4/29/2024	ATH	0.738	\$196.00	\$144.65	EPSDT		Call with Ms. Prince from DDS (5 min), review ZSF edits to admin docs, send to parent for signature, call with parent re: signing admin docs / PCA complaint from Ms. Prince at DDS (8 min)
730	4/30/2024	ATH	0.420	\$196.00	\$82.32	EPSDT		Call with parent / Ms. Prince from DDS re: admin docs
731	5/28/2024	ATH	2.204	\$196.00	\$431.98	EPSDT		Draft email to HSCSN Fontaine re: CM / MDT meeting, draft email for MDT meeting, outreach to other contacts for MDT meeting
732	5/31/2024	ATH	0.261	\$196.00	\$51.16	EPSDT		Draft communications to HSCSN re: MDT meeting, call with Ms. Prince from DDS re: MDT meeting (5 min)
733	6/5/2024	ATH	0.321	\$196.00	\$62.92	EPSDT		Call from Ms. Prince DDS (10 min), update phone notes
734	6/13/2024	ATH	2.347	\$196.00	\$460.01	EPSDT		MDT meeting with ZSF, Dr. Felten, parent, Prince (DDS), Kelvin Somerville (Heart by Hope), Cole (Linac Services), Daniels (DDS behavioral clinician), Momina (HSCSN), Ford (HSCSN), Stewart (HSCSH) (1 hour 45 min); draft follow up communications

Matter: MS, a minor

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735	6/26/2024	ATH	0.921	\$196.00	\$180.52	EPSDT		MDT meeting with Prince from DDS, parent, Ford / Ahmed from HSCSN, Summerville from HeartbyHope (30 min), draft follow up communications to meeting attendees
736	4/23/2024	ZSF	0.336	\$196.00	\$65.86	EPSDT		Edit retainer agreement, appointment of authorized representative, and HIPAA consent documents
737	5/28/2024	ZSF	0.196	\$196.00	\$38.42	EPSDT		Edit emails to HSCSN requesting assistance to access behavioral health services
738	5/31/2024	ZSF	0.053	\$196.00	\$10.39	EPSDT		Review ATH email to HSCSN requesting care coordination assistance for multidisciplinary team meeting
739	6/13/2024	ZSF	1.234	\$196.00	\$241.86	EPSDT		Represent MS in meeting w HSCSN and DDS re services needed (59 min.); review ATH follow up email of summary and next steps to meeting attendees (15 min.)

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Matter: SJ, a minor								
740	5/3/2024	AIN	0.070	\$196.00	\$13.72	EPSDT		Check eligibility status through Magellan line
741	5/6/2024	AIN	0.070	\$196.00	\$13.72	EPSDT		Check SJ eligibility via Magellan hotline (1.5 min); message ACA re same (0.5 min); draft email to parent re same (2 min)

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Matter: VF, a minor								
742	6/18/2024	DAP	0.433	\$196.00	\$84.87	EPSDT		Update HIPAA agreements in English and Spanish
743	5/13/2024	ZSF	0.250	\$196.00	\$49.00	EPSDT		Tel call w parent re delay in provision of OT, PT, ST and lack of reliable incontinent supplies
744	5/14/2024	ZSF	0.475	\$196.00	\$93.10	EPSDT		Email to HSCSN re outstanding OT, PT, ST and issues with incontinence products (17 min.); notes to file (11 min.)
745	5/17/2024	ZSF	0.600	\$196.00	\$117.60	EPSDT		Tel call w mother re urgency of lack of incontinence products (11 min); memo to file (6 min.); follow up escalation email exchange with HSCSN to address supplies issue and ongoing delay in provision of corrective treatment services (20 min.)
746	5/22/2024	ZSF	0.320	\$196.00	\$62.72	EPSDT		Tel call with parent re ongoing lack of incontinence supplies (6 min.); email to HSCSN requesting assistance to resolve issue
747	5/23/2024	ZSF	0.231	\$196.00	\$45.28	EPSDT		Read and respond to email from HSCSN re resolution of issue re lack of incontinence products (6 min); tel calls with parent re same (4 min); follow up email to HSCSN re lack of delivery expected today (3 min.)
748	5/24/2024	ZSF	0.224	\$196.00	\$43.90	EPSDT		Tel call with parent to confirm one-time receipt of emergency incontinence supplies (8 min.); inform HSCSN re need for replacement supplies and anticipated need based limited delivery (5 min)
749	5/30/2024	ZSF	0.478	\$196.00	\$93.69	EPSDT		Tel call w parent re status of incontinence products and therapy services (18 min.); email to HSCSN re continued lack of therapy services (5 min.); and to care manager re potential occupational therapy provider (5 min.)
750	6/17/2024	ZSF	0.026	\$196.00	\$5.10	EPSDT		Instructions to DAP re updating HIPPA form
751	6/20/2024	ZSF	0.181	\$196.00	\$35.48	EPSDT		Tel call to parent re status of delayed OT/PT/ST services and backlog of incontinence products owed per agreement
752	6/24/2024	ZSF	0.190	\$196.00	\$37.24	EPSDT		Email to HSCSN re status of delayed therapy services and incontinence supplies due per agreement

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Matter: Medicaid Salazar Individual Claims								
753	4/22/2024	AIN	0.042	\$196.00	\$8.23	EPSDT		Call [REDACTED] re intake
754	5/3/2024	AIN	0.230	\$196.00	\$45.08	EPSDT		[REDACTED] - Review client info/previous outreach (4 min); call client several times (2 min); add to phone notes (2 min); draft email to potential client re info needed for intake (6 min)
755	5/6/2024	AIN	0.050	\$196.00	\$9.80	EPSDT		E.D. - edit draft and send email to parent re intake questions
756	5/14/2024	AIN	0.392	\$196.00	\$76.83	EPSDT		[REDACTED]: attempt to call re intake (1 min); answer t/c from parent re same (3.5 min); draft case agreements (19 min)
757	5/16/2024	AIN	0.449	\$196.00	\$88.00	EPSDT		[REDACTED]: Update ACA re status of case (3 min); prepare and send out case agreements for parent signature (17 min); draft and send email to parent re case agreements and legal services (7 min)
758	6/25/2024	AIN	0.100	\$196.00	\$19.60	EPSDT		Call parent re admin docs
759	6/26/2024	AIN	0.146	\$196.00	\$28.62	EPSDT		Draft email explaining situation to ACA
760	5/10/2024	ATH	0.251	\$196.00	\$49.20	EPSDT		Call to [REDACTED] re: appeal and forms signing (3 min), updating admin docs with correct spelling of names
761	6/12/2024	ATH	0.692	\$196.00	\$135.63	EPSDT		Outreach to [REDACTED] re: admin documents / editing admin docs, call to parent (4 min)
762	5/30/2024	ZSF	0.070	\$196.00	\$13.72	Reimbursement		D. Hartsfield: Read and respond to email from ATH re assistance to caller re billing for services that should have been covered by Medicaid
763	4/9/2024	AIN	0.841	\$196.00	\$164.84	Recertification		Review DAP instructions for task (2 min); draft email to clients (8 min); ask DAP re email (5 min); ask ZSF re email (2 min); gather client info and send email (34 min)
764	4/10/2024	AIN	0.770	\$196.00	\$150.92	Recertification		Attend MC Renewal meeting and take notes
765	6/20/2024	AIN	0.304	\$196.00	\$59.58	Recertification		Email all parents
766	6/5/2024	ATH	0.373	\$196.00	\$73.11	Recertification		Attend communal Medicaid renewal meeting
767	6/26/2024	ATH	0.403	\$196.00	\$78.99	Recertification		Attend biweekly community renewal meeting
768	4/10/2024	AIN	0.120	\$196.00	\$23.52	Referral for Non-Class Member		Answer hotline call from [REDACTED]

Matter: Medicaid Salazar Individual Claims

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769	4/22/2024	AIN	0.130	\$196.00	\$25.48	Referral for Non-Class Member		Answer hotline call from [REDACTED]
770	4/22/2024	AIN	0.250	\$196.00	\$49.00	Referral for Non-Class Member		Answer hotline call from [REDACTED]
771	4/25/2024	AIN	0.250	\$196.00	\$49.00	Referral for Non-Class Member		Answer hotline call from [REDACTED]
772	5/13/2024	AIN	0.010	\$196.00	\$1.96	Referral for Non-Class Member		Answer hotline call from [REDACTED]
773	5/14/2024	AIN	0.030	\$196.00	\$5.88	Referral for Non-Class Member		Answer hotline call from [REDACTED]
774	5/15/2024	AIN	0.030	\$196.00	\$5.88	Referral for Non-Class Member		Answer hotline call
775	5/20/2024	ATH	0.074	\$196.00	\$14.50	Referral for Non-Class Member		Draft communications to [REDACTED]
776	6/20/2024	ATH	0.207	\$196.00	\$40.57	Referral for Non-Class Member		Call back and referral for [REDACTED]
777	5/17/2024	ZSF	0.250	\$196.00	\$49.00	Referral for Non-Class Member		[REDACTED]: referral to employment organization for non payment issues
778	4/4/2024	AIN	1.300	\$196.00	\$254.80	Case Management		Meet w ZSF, KLM, ATH, DAP, and ACA (partial) re individual case statuses and next steps
779	4/11/2024	AIN	1.080	\$196.00	\$211.68	Case Management		Meet w/ KLM, ACA, DAP, ATH, and ZSF (partial) re individual case statuses and next steps
780	4/18/2024	AIN	1.570	\$196.00	\$307.72	Case Management		Meet w/ KLM, DAP, ACA, ZSF (partial), ATH (partial) re individual case statuses and next steps
781	4/25/2024	AIN	1.450	\$196.00	\$284.20	Case Management		Meet w ZSF, ATH, and DAP re individual case updates and next steps
782	5/2/2024	AIN	1.170	\$196.00	\$229.32	Case Management		Meet w ZSF, ATH, and DAP (partial) re individual case updates and next steps
783	5/16/2024	AIN	1.500	\$196.00	\$294.00	Case Management		Meet w ZSF, DAP, ATH re individual case statuses
784	5/23/2024	AIN	0.970	\$196.00	\$190.12	Case Management		Meet w/ ZSF, KLM, DAP, ATH re individual case updates

Matter: Medicaid Salazar Individual Claims

Monday, September 23, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
785	6/20/2024	AIN	0.970	\$196.00	\$190.12	Case Management		Meet w ZSF, DAP, ATH re individual case statuses
786	6/27/2024	AIN	0.930	\$196.00	\$182.28	Case Management		Meet w/ ZSF, DAP, and ATH re status and next steps on all open cases
787	6/28/2024	AIN	1.000	\$196.00	\$196.00	Case Management		Meet w/ ZSF, KLM, DAP and ATH re individual case statuses and next steps
788	4/4/2024	ATH	1.300	\$196.00	\$254.80	Case Management		Weekly medicaid meeting with ZSF, ACA, KLM, DAP, AIN
789	4/11/2024	ATH	1.031	\$196.00	\$202.08	Case Management		Weekly Medicaid meeting with ZSF, DAP, AIN, KLM, ACA
790	4/18/2024	ATH	1.424	\$196.00	\$279.10	Case Management		Weekly medicaid meeting with DAP, AIN, KLM, ACA, ZSF
791	4/25/2024	ATH	1.450	\$196.00	\$284.20	Case Management		Weekly medicaid meeting with DAP, AIN, ZSF
792	5/2/2024	ATH	1.180	\$196.00	\$231.28	Case Management		Weekly meeting with DAP, AIN, ZSF
793	5/16/2024	ATH	1.498	\$196.00	\$293.61	Case Management		Weekly medicaid meeting with ACA, DAP, AIN, ZSF
794	5/23/2024	ATH	0.970	\$196.00	\$190.12	Case Management		Weekly medicaid meeting with DAP, AIN, KLM, ZSF
795	5/31/2024	ATH	1.080	\$196.00	\$211.68	Case Management		Weekly Medicaid meeting with DAP, ZSF, KLM
796	6/6/2024	ATH	0.770	\$196.00	\$150.92	Case Management		Weekly Medicaid meeting with DAP, ZSF
797	6/13/2024	ATH	2.030	\$196.00	\$397.88	Case Management		Weekly Medicaid meeting with KLM, ACA, DAP, ZSF
798	6/20/2024	ATH	0.880	\$196.00	\$172.48	Case Management		weekly Medicaid meeting with DAP, AIN, ZSF, KLM
799	6/27/2024	ATH	0.921	\$196.00	\$180.52	Case Management		Weekly Meeting with DAP, AIN, ZSF
800	6/28/2024	ATH	1.034	\$196.00	\$202.66	Case Management		Weekly Medicaid meeting with DAP, AIN, ZSF
801	4/4/2024	DAP	1.300	\$196.00	\$254.80	Case Management		Meet w ZSF, ATH, AIN, KLM, and ACA (partial) re individual case updates and next steps
802	4/11/2024	DAP	1.083	\$196.00	\$212.27	Case Management		Meet w ZSF (partial), ATH, AIN, KLM, and ACA (partial) re individual case updates and next steps
803	4/18/2024	DAP	1.533	\$196.00	\$300.47	Case Management		Meet w ZSF (partial), ATH (partial), AIN, KLM, and ACA (partial) re individual case updates and next steps
804	4/25/2024	DAP	1.450	\$196.00	\$284.20	Case Management		Meet w ZSF, ATH, and AIN re individual case updates and next steps

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
805	5/2/2024	DAP	0.300	\$196.00	\$58.80	Case Management		Meet w ZSF, ATH, and AIN re individual case updates and next steps
806	5/16/2024	DAP	1.500	\$196.00	\$294.00	Case Management		Meet w ZSF, ACA (partial), ATH, and AIN re individual case updates and next steps
807	5/23/2024	DAP	0.967	\$196.00	\$189.53	Case Management		Meet w ZSF, KLM, ATH, and AIN re individual case updates and next steps
808	5/31/2024	DAP	1.250	\$196.00	\$245.00	Case Management		Meet w/ KLM, ZSF, and ATH re status and next steps on all open cases
809	6/6/2024	DAP	0.217	\$196.00	\$42.53	Case Management		Meet w/ ZSF and ATH re status and next steps on all open cases (left early)
810	6/13/2024	DAP	2.033	\$196.00	\$398.47	Case Management		Meet w/ ZSF, KLM, ACA (partial), and ATH re status and next steps on all open cases
811	6/20/2024	DAP	0.883	\$196.00	\$173.07	Case Management		Meet w/ ZSF, AIN, and ATH re status and next steps on all open cases
812	6/27/2024	DAP	0.933	\$196.00	\$182.87	Case Management		Meet w/ ZSF, AIN, and ATH re status and next steps on all open cases
813	6/28/2024	DAP	1.000	\$196.00	\$196.00	Case Management		Continue meeting w/ ZSF, AIN, KLM, and ATH re status and next steps on all open cases
814	4/4/2024	KLM	1.170	\$196.00	\$229.32	Case Management		Confer with ZSF, ACA (part of meeting), and the paralegals re status and next steps on all open cases
815	4/11/2024	KLM	1.000	\$196.00	\$196.00	Case Management		Confer with ACA, ZSF, and the paralegals re status and next steps on all open cases
816	4/18/2024	KLM	1.570	\$196.00	\$307.72	Case Management		Confer with ZSF, ACA (part of meeting), and the paralegals re status and next steps on all open cases
817	5/23/2024	KLM	0.970	\$196.00	\$190.12	Case Management		Confer with ZSF and the paralegals re status and next steps on all open cases
818	5/31/2024	KLM	1.250	\$196.00	\$245.00	Case Management		Confer with ZSF, DAP and ATH re status and next steps on all open cases
819	6/13/2024	KLM	2.030	\$196.00	\$397.88	Case Management		Confer with ZSF, ACA (part of meeting, ATH and DAP re status and next steps on all open cases

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
820	6/28/2024	KLM	0.950	\$196.00	\$186.20	Case Management		Confer with ZSF and the paralegals re status and next steps on all open cases
821	4/4/2024	ZSF	1.300	\$196.00	\$254.80	Case Management		Meeting w KLM, ACA (portion) and paralegals re factual and legal status of each case
822	4/11/2024	ZSF	0.580	\$196.00	\$113.68	Case Management		Meeting with KLM and paralegals re factual and legal status of each case and next steps
823	4/18/2024	ZSF	1.420	\$196.00	\$278.32	Case Management		Meeting with KLM, ACA (partial), and paralegals re factual and legal developments in each case and next steps
824	4/25/2024	ZSF	1.450	\$196.00	\$284.20	Case Management		Meeting with paralegals re factual and legal developments in each case and next steps
825	5/2/2024	ZSF	1.180	\$196.00	\$231.28	Case Management		Meeting with paralegals re factual and legal developments in each case and next steps
826	5/16/2024	ZSF	1.500	\$196.00	\$294.00	Case Management		Meeting w ACA (partial) and paralegals re factual and legal developments and next steps in each case
827	5/23/2024	ZSF	0.970	\$196.00	\$190.12	Case Management		Meeting with KLM and paralegals re factual and legal developments and next steps
828	5/31/2024	ZSF	1.220	\$196.00	\$239.12	Case Management		Meeting with KLM, DAP and ATH re factual and legal developments in each case and next steps
829	6/6/2024	ZSF	0.779	\$196.00	\$152.68	Case Management		Meeting w DAP and ATH re factual and legal developments in each case and next steps
830	6/13/2024	ZSF	2.030	\$196.00	\$397.88	Case Management		Meeting with KLM, ACA and paralegals re factual and legal developments in each case and next steps
831	6/20/2024	ZSF	0.880	\$196.00	\$172.48	Case Management		Meeting with paralegals re factual and legal developments and next steps in each case
832	6/27/2024	ZSF	0.930	\$196.00	\$182.28	Case Management		Meet with paralegals re factual and legal developments and next steps in each case
833	6/28/2024	ZSF	1.000	\$196.00	\$196.00	Case Management		Continue meeting with KLM and paralegals re factual and legal developments and next steps in each case

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: PJ Monitoring - 0988								
834	4/24/2024	AIN	2.000	\$196.00	\$392.00	EPSDT	MCAC Meeting	Attend MCAC meeting and take notes
835	4/2/2024	ATH	2.307	\$196.00	\$452.17	EPSDT	MCAC Meeting	Note taking of MCAC meeting Feb 2024
836	4/4/2024	ATH	0.578	\$196.00	\$113.29	EPSDT	MCAC Meeting	Note taking of Feb 2024 MCAC meeting
837	4/24/2024	ATH	0.989	\$196.00	\$193.84	EPSDT	Open Records Appeal (FOIA, etc)	Proof and cite check of appeal of FOIA denial, exhibit preparation
838	5/2/2024	ATH	0.916	\$196.00	\$179.54	EPSDT	Monitoring Compliance	Investigate HSCSN provider website for corrections to errors found and brought to HSCSN's attention in March meeting
839	6/12/2024	ATH	0.232	\$196.00	\$45.47	EPSDT	Transportation Assistance	Proof and cite check of Letter to HSCSN re Transportation
840	6/5/2024	DAP	0.208	\$196.00	\$40.77	EPSDT	Monitoring Compliance	Draft email to Ms. Ricciardi re proposed meeting to discuss systemic issues; send email
841	6/13/2024	DAP	0.037	\$196.00	\$7.25	EPSDT	Monitoring Compliance	Draft follow-up email to Ms. Ricciardi re proposed meeting times to discuss systemic issues
842	6/20/2024	DAP	0.269	\$196.00	\$52.72	EPSDT	Monitoring Compliance	Review email from Ms. Ricciardi re proposed meeting times to discuss systemic issues; email reply to Ms. Ricciardi with updated proposed meeting times
843	4/16/2024	KLM	0.100	\$693.00	\$69.30	EPSDT	Participant Ratio CAP	Review and edit email to defendants requesting a meeting with Court Monitor Joe Zickafoose to address the declining 416 performance and CAPs
844	4/24/2024	KLM	0.692	\$693.00	\$479.56	EPSDT	Open Records Appeal (FOIA, etc)	Review and edit appeal letter to the Mayor
845	6/7/2024	KLM	0.305	\$693.00	\$211.37	EPSDT	Transportation Assistance	Review and edit letter to HSCSN re transportation assistance options for caregivers
846	6/12/2024	KLM	0.130	\$693.00	\$90.09	EPSDT	Transportation Assistance	Complete review and edit of letter to HSCSN re transportation assistance options for caregivers
847	6/25/2024	KLM	0.080	\$693.00	\$55.44	EPSDT	Paragraph 48(b) Report	Review and edit email to defendants re para. 48 report that was due on 6/15
848	4/22/2024	NFS	0.711	\$523.00	\$371.85	EPSDT	Open Records Appeal (FOIA, etc)	Review TAG draft of appeal, research issues, propose edits
849	4/16/2024	TAG	1.343	\$523.00	\$702.39	EPSDT	Open Records Appeal (FOIA, etc)	Review request; draft appeal
850	4/18/2024	TAG	1.338	\$523.00	\$699.77	EPSDT	Open Records Appeal (FOIA, etc)	Continue drafting appeal; related research

Matter: PJ Monitoring - 0988

Monday, September 23, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
851	4/22/2024	TAG	2.856	\$523.00	\$1,493.69	EPSDT	Open Records Appeal (FOIA, etc)	Continue research re appeal; continue drafting appeal
852	4/23/2024	TAG	1.200	\$523.00	\$627.60	EPSDT	Open Records Appeal (FOIA, etc)	Review NFS edits; review Mayor's legal decisions; update letter
853	4/24/2024	TAG	0.945	\$523.00	\$494.24	EPSDT	Open Records Appeal (FOIA, etc)	Review KLM edits to FOIA appeal
854	6/10/2024	TAG	0.871	\$523.00	\$455.53	EPSDT	Open Records Appeal (FOIA, etc)	Review recent D.C. Circuit decision in American Oversight v. HHS; call Mayor's Office of Legal Counsel
855	4/4/2024	ZSF	0.143	\$523.00	\$74.79	EPSDT	Escrow Oversight	Read quarterly report re oral health project
856	4/8/2024	ZSF	0.264	\$523.00	\$138.07	EPSDT	Monitoring Compliance	Review 2024 EPSDT Healthcheck Brochure and dental health transmittal required under Settlement Agreement
857	4/15/2024	ZSF	0.246	\$523.00	\$128.66	EPSDT	Open Records Response (FOIA Response)	Review FOIA response re Managed Care Strategy
858	4/15/2024	ZSF	1.757	\$523.00	\$918.91	EPSDT	CMS Form 416	Review and analyze data from FY 2023 Form 416 from DC and MCPs
859	4/16/2024	ZSF	0.319	\$523.00	\$166.84	EPSDT	Participant Ratio CAP	Draft email to court monitor and District re review of CAPs
860	4/17/2024	ZSF	0.029	\$523.00	\$15.17	EPSDT	Open Records Response (FOIA Response)	Confer via email w TAG and KLM re FOIA response for Medicaid Managed Care Quality Plan related documents (2 min) and send email response to FOIA officer re DHCF response
861	4/17/2024	ZSF	0.125	\$523.00	\$65.38	EPSDT	Participant Ratio CAP	Update and send email to court monitor and District re review of CAPs
862	4/22/2024	ZSF	0.102	\$523.00	\$53.35	EPSDT	Monitoring Compliance	Read DC Register re proposed legislation re changes to PCA certifications and Medicaid eligibility
863	4/23/2024	ZSF	0.229	\$523.00	\$119.77	EPSDT	Participant Ratio CAP	Read and respond to email from court monitor re review of MCP CAPs
864	4/23/2024	ZSF	0.237	\$523.00	\$123.95	EPSDT	Open Records Response (FOIA Response)	Review TAG appeal of DHCF FOIA response
865	4/24/2024	ZSF	0.130	\$523.00	\$67.99	EPSDT	Open Records Response (FOIA Response)	Review additions to appeal to Mayor re FOIA response
866	4/25/2024	ZSF	0.452	\$523.00	\$236.40	EPSDT	MCAC Meeting	Read MCAC presentation materials re budget and waiver expansion proposals and consider impacts to children's services

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
867	5/2/2024	ZSF	0.065	\$523.00	\$34.00	EPSDT	Open Records Response (FOIA Response)	Read DC Mayor response to DHCF to FOIA appeal re request for documents re CMS feedback re 2020 DC Managed Care Quality Strategy
868	5/7/2024	ZSF	0.066	\$523.00	\$34.52	EPSDT	Participant Ratio CAP	Follow up email to District re meeting to discuss CAPs
869	6/3/2024	ZSF	1.658	\$523.00	\$867.13	EPSDT	Participant Ratio CAP	Review MCP CAPs
870	6/4/2024	ZSF	0.324	\$523.00	\$169.45	EPSDT	Participant Ratio CAP	Review MCP CAPs
871	6/4/2024	ZSF	1.035	\$523.00	\$541.31	EPSDT	Participant Ratio CAP	Review 2023 DHCF managed care program Annual Technical Report re MCP performance on delivery EPSDT services
872	6/5/2024	ZSF	0.236	\$523.00	\$123.43	EPSDT	Monitoring Compliance	Edit DAP email to HSCSN re next discussion re systemic barriers to access to care and prompt delivery of services pursuant to DHCF appointment timeliness standard for managed care
873	6/6/2024	ZSF	1.205	\$523.00	\$630.22	EPSDT	Transportation Assistance	Draft follow up letter to HSCSN re discussions and suggestions re systemic issues
874	6/6/2024	ZSF	1.566	\$523.00	\$819.02	EPSDT	Monitoring Compliance	Continue review of 2023 DHCF managed care program Annual Technical Report re MCP performance on delivery EPSDT services
875	6/7/2024	ZSF	0.754	\$523.00	\$394.34	EPSDT	Participant Ratio CAP	Review MedStar CAP
876	6/7/2024	ZSF	4.476	\$523.00	\$2,340.95	EPSDT	Monitoring Compliance	Continue to review of 2023 DHCF managed care program Annual Technical Report re MCP performance on delivery EPSDT services, including analysis of all data and draft summary memo
877	6/10/2024	ZSF	5.130	\$523.00	\$2,682.99	EPSDT	Participant Ratio CAP	Review MedStar CAP and draft comments
878	6/11/2024	ZSF	0.369	\$523.00	\$192.99	EPSDT	Open Records Appeal (FOIA, etc)	Read decision of Mayor's Office of Legal Counsel on FOIA request for CMS Feedback on DCHF 2020 Managed Care Strategy
879	6/11/2024	ZSF	3.679	\$523.00	\$1,924.12	EPSDT	Participant Ratio CAP	Review MedStar CAP and draft comments
880	6/12/2024	ZSF	0.429	\$523.00	\$224.37	EPSDT	Transportation Assistance	Review KLM edits to letter to HSCSN re suggestions to address systemic transportation issues for special needs population, revise, finalize and send letter

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
881	6/13/2024	ZSF	0.048	\$523.00	\$25.10	EPSDT	Transportation Assistance	Read HSCSN email response to letter with suggestions to address systemic transportation issues for special needs population
882	6/13/2024	ZSF	0.794	\$523.00	\$415.26	EPSDT	Participant Ratio CAP	Review MedStar CAP and draft comments
883	6/17/2024	ZSF	0.382	\$523.00	\$199.79	EPSDT	Open Records Request (FOIA Request)	Draft and submit request to DC FOIA re CMS feedback to 2024 Medicaid Managed Care Quality Strategy
884	6/24/2024	ZSF	0.238	\$523.00	\$124.47	EPSDT	Paragraph 48(b) Report	Review para 48 provision and draft email to Defendants re compliance with it
885	6/28/2024	ZSF	0.045	\$523.00	\$23.54	EPSDT	Paragraph 48(b) Report	Review para 48 provision and draft email to Defendants re compliance with it
886	4/16/2024	AIN	0.256	\$196.00	\$50.18	ECF Management		Process ECFs
887	4/22/2024	AIN	0.110	\$196.00	\$21.56	ECF Management		Process ECFs
888	4/30/2024	AIN	0.146	\$196.00	\$28.62	ECF Management		Process ECFs
889	5/2/2024	AIN	0.044	\$196.00	\$8.62	ECF Management		Process ECFs
890	5/31/2024	ATH	0.304	\$196.00	\$59.58	ECF Management		Process ECFs 2425, 2426
891	5/17/2024	ATH	0.817	\$196.00	\$160.13	Settlement	Mediation Follow-Up	Proof and cite check of Plaintiffs modified proposals for ZSF
892	6/5/2024	ATH	0.182	\$196.00	\$35.67	Settlement	Mediation Preparation	Proof and website link check of Plaintiffs' transportation proposals document
893	4/12/2024	KLM	1.530	\$693.00	\$1,060.29	Settlement	Mediation Preparation	Confer with ZSF and TAG re next steps in response to DC's settlement proposal of 3/20/2024
894	4/16/2024	KLM	1.030	\$693.00	\$713.79	Settlement	Mediation Preparation	Confer with ZSF and J. Perkins to prepare for the 4/23 mediation session
895	4/17/2024	KLM	1.471	\$693.00	\$1,019.40	Settlement	Mediation Preparation	Exchange emails with J. Perkins and ZSF; prepare for the pre-mediation session with the mediators and ZSF; meet with ZSF and the mediators
896	4/23/2024	KLM	0.913	\$693.00	\$632.71	Settlement	Mediation Preparation	Review further response from DC re transportation and recipient-directed care for PCA services; review other documents to prepare for the mediation
897	4/23/2024	KLM	2.740	\$693.00	\$1,898.82	Settlement	Mediation Session	Represent plaintiffs at the mediation

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
898	5/7/2024	KLM	0.420	\$693.00	\$291.06	Settlement	Mediation Follow-Up	Review and edit term sheet prepared by ZSF (15 min.); review emails re the 2023 Form 416 and draft follow-up email to defendants (10 min.)
899	5/8/2024	KLM	1.200	\$693.00	\$831.60	Settlement	Mediation Follow-Up	Review and edit term sheet
900	5/16/2024	KLM	0.844	\$693.00	\$584.89	Settlement	Mediation Follow-Up	Review and edit submission to mediators due on 5/17
901	5/17/2024	KLM	0.187	\$693.00	\$129.59	Settlement	Mediation Follow-Up	Review file re plaintiffs' assignment for submission today
902	5/20/2024	KLM	1.038	\$693.00	\$719.33	Settlement	Mediation Follow-Up	Webinar re new MCAC provisions
903	5/22/2024	KLM	0.446	\$693.00	\$309.08	Settlement	Mediation Preparation	Review article from KFF re transparency re MCO financial data; review article re MCO profits post-unwinding
904	5/23/2024	KLM	0.292	\$693.00	\$202.36	Settlement	Mediation Follow-Up	Read and think about DC's 5/17/24 response on mediation issues
905	5/29/2024	KLM	0.680	\$693.00	\$471.24	Settlement	Mediation Preparation	Confer with ZSF to prepare for 5/30 mediation session
906	5/30/2024	KLM	1.700	\$693.00	\$1,178.10	Settlement	Mediation Session	Mediation meeting with defendants
907	6/5/2024	KLM	0.468	\$693.00	\$324.32	Settlement	Mediation Follow-Up	Review and edit proposal to DC with specifics about improving transportation assistance for children with special needs
908	6/24/2024	KLM	1.650	\$693.00	\$1,143.45	Settlement	Mediation Preparation	Confer with ZSF re strategy for 6/25 mediation session
909	4/12/2024	TAG	1.530	\$523.00	\$800.19	Settlement	Mediation Preparation	Confer with KLM and ZSF re negotiation points
910	4/8/2024	ZSF	0.200	\$523.00	\$104.60	Settlement	Mediation Preparation	Review District's March 2024 offer
911	4/9/2024	ZSF	0.395	\$523.00	\$206.59	Settlement	Mediation Preparation	Communications with KLM and co-counsel re preparation for upcoming meetings with mediators
912	4/12/2024	ZSF	0.076	\$523.00	\$39.75	Settlement	Status Report(s)	Read District's draft joint status report to Court
913	4/12/2024	ZSF	1.500	\$523.00	\$784.50	Settlement	Mediation Preparation	Meeting with TAG and KLM re response to District's March 2024 response
914	4/16/2024	ZSF	1.522	\$523.00	\$796.01	Settlement	Mediation Preparation	Prepare for and participate in meeting with KLM and J. Perkins re response to District's March 2024 response
915	4/17/2024	ZSF	0.200	\$523.00	\$104.60	Settlement	Mediation Preparation	Prepare for meeting with mediators
916	4/17/2024	ZSF	0.421	\$523.00	\$220.18	Settlement	Mediation Follow-Up	Draft follow up email to mediators re requesting information
917	4/17/2024	ZSF	0.850	\$523.00	\$444.55	Settlement	Mediation Preparation	Participate in meeting with mediators and KLM

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
918	4/19/2024	ZSF	0.054	\$523.00	\$28.24	Settlement	Status Report(s)	Review minute order re joint status report due in May 2024 and add to court calendar
919	4/22/2024	ZSF	1.296	\$523.00	\$677.81	Settlement	Mediation Preparation	Read District's supplemental response from April 19 (15 min.); review CMS final rule related to MCAC access and specific proposals from Plaintiffs (1 hr 2 min)
920	4/23/2024	ZSF	1.970	\$523.00	\$1,030.31	Settlement	Mediation Preparation	Review CMS final Medicaid and CHIP Managed Care Access rule related to proposals from Plaintiffs (1 hr 32 min); meeting notes with HSCSN and class members re transportation issues (26 min)
921	4/23/2024	ZSF	2.730	\$523.00	\$1,427.79	Settlement	Mediation Session	Participate in mediation session with KLM, Jane Perkins, mediators and District
922	4/24/2024	ZSF	0.210	\$523.00	\$109.83	Settlement	Mediation Follow-Up	Read email from mediator re schedule for deliverables and next session and discuss w colleagues
923	4/25/2024	ZSF	0.200	\$523.00	\$104.60	Settlement	Mediation Follow-Up	Email correspondence with mediators and defendants re schedule for deliverables and next sessions (6 min.); email to defendants re factual inquiry relate to proposal (6 min.)
924	5/5/2024	ZSF	2.637	\$523.00	\$1,379.15	Settlement	Mediation Follow-Up	Prepare settlement term sheet
925	5/6/2024	ZSF	0.721	\$523.00	\$377.08	Settlement	Mediation Follow-Up	Prepare settlement term sheet
926	5/7/2024	ZSF	1.347	\$523.00	\$704.48	Settlement	Mediation Follow-Up	Prepare settlement term sheet
927	5/8/2024	ZSF	0.399	\$523.00	\$208.68	Settlement	Mediation Follow-Up	Prepare settlement term sheet
928	5/10/2024	ZSF	0.327	\$523.00	\$171.02	Settlement	Mediation Follow-Up	Finalize and send settlement term sheet to mediators
929	5/15/2024	ZSF	4.004	\$523.00	\$2,094.09	Settlement	Mediation Follow-Up	Draft additional or revised proposals per mediators' request
930	5/16/2024	ZSF	0.127	\$523.00	\$66.42	Settlement	Mediation Follow-Up	Identify "homework" documents for District per mediators' request
931	5/16/2024	ZSF	0.534	\$523.00	\$279.28	Settlement	Mediation Follow-Up	Review KLM edits to draft with additional or revised proposals per mediators' request and conduct related research re existing DC practices
932	5/17/2024	ZSF	0.462	\$523.00	\$241.63	Settlement	Mediation Follow-Up	Review ATH proof and cite check edits to draft with additional or revised proposals, finalize same, and send to mediators
933	5/22/2024	ZSF	0.361	\$523.00	\$188.80	Settlement	Mediation Preparation	Review District's May 17 proposal provided by mediators

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
934	5/29/2024	ZSF	0.700	\$523.00	\$366.10	Settlement	Mediation Preparation	Confer with KLM re upcoming mediation session and District's May 17 responses
935	5/30/2024	ZSF	0.080	\$523.00	\$41.84	Settlement	Status Report(s)	Review status report and proposed order (3 min.); email to District re same (1 min.)
936	5/30/2024	ZSF	0.256	\$523.00	\$133.89	Settlement	Mediation Preparation	Review proposals and responses in preparation for mediation today
937	5/30/2024	ZSF	1.662	\$523.00	\$869.23	Settlement	Mediation Session	Represent class in mediation w KLM
938	5/31/2024	ZSF	0.213	\$523.00	\$111.40	Settlement	Mediation Follow-Up	Read emails from mediator re follow up dates and action items
939	6/4/2024	ZSF	0.048	\$523.00	\$25.10	Settlement	Mediation Follow-Up	Email correspondence with Defendants and mediators re next session
940	6/5/2024	ZSF	0.039	\$523.00	\$20.40	Settlement	Mediation Follow-Up	Respond to email from mediators re availability for next session
941	6/5/2024	ZSF	2.607	\$523.00	\$1,363.46	Settlement	Mediation Preparation	Research and draft proposal to District in response to their May 17 paper
942	6/7/2024	ZSF	0.117	\$523.00	\$61.19	Settlement	Mediation Preparation	Finalize and send draft proposal to District in response to their May 17 paper
943	6/17/2024	ZSF	0.209	\$523.00	\$109.31	Settlement	Mediation Preparation	Email correspondence with mediators re District's responses
944	6/24/2024	ZSF	0.580	\$523.00	\$303.34	Settlement	Mediation Preparation	Review District's responses
945	6/24/2024	ZSF	1.630	\$523.00	\$852.49	Settlement	Mediation Preparation	Prepare for mediation with KLM
946	6/27/2024	ZSF	0.019	\$523.00	\$9.94	Settlement	Mediation Preparation	Communications with mediators re scheduling next mediation

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
Matter: Fees - 0808								
947	5/31/2024	ZSF	0.321	\$878.00	\$281.84	2023 Submissions	Negotiations with Def	Read defendants' response to settlement offer for 2023 Q4 fees
948	5/31/2024	DAP	0.488	\$239.00	\$116.63	2023 Application	Consent Motion, Third Quarter	Redact client names from exhibit 6
949	6/3/2024	DAP	0.636	\$239.00	\$152.00	2023 Application	Consent Motion, Third Quarter	Proof unopposed motion and memorandum in support of unopposed motion
950	6/3/2024	DAP	1.058	\$239.00	\$252.86	2023 Application	Consent Motion, Third Quarter	Redact client names from exhibit 6
951	6/4/2024	DAP	0.284	\$239.00	\$67.88	2023 Application	Consent Motion, Third Quarter	Proof Exhibit 2 KLM Declaration
952	6/4/2024	DAP	1.472	\$239.00	\$351.81	2023 Application	Consent Motion, Third Quarter	Cite check memorandum in support of unopposed motion
953	6/5/2024	DAP	0.167	\$239.00	\$39.91	2023 Application	Consent Motion, Third Quarter	Proof/cite check proposed orders
954	6/5/2024	DAP	0.245	\$239.00	\$58.56	2023 Application	Consent Motion, Third Quarter	Prepare exhibit 6 and 7
955	6/5/2024	DAP	0.272	\$239.00	\$65.01	2023 Application	Consent Motion, Third Quarter	Proof/cite notice to class and motion to clerk re notice to class
956	6/5/2024	DAP	0.460	\$239.00	\$109.94	2023 Application	Consent Motion, Third Quarter	Proof/cite check J. Perkins declaration
957	6/5/2024	DAP	0.645	\$239.00	\$154.16	2023 Application	Consent Motion, Third Quarter	Continue proof of Exhibit 2 KLM Declaration; cite check KLM declaration
958	6/6/2024	DAP	0.810	\$239.00	\$193.59	2023 Application	Consent Motion, Third Quarter	Prepare exhibit 11 Attorney Resumes; prepare all exhibits for filing
959	5/31/2024	KLM	0.513	\$1,057.00	\$542.24	2023 Application	Consent Motion, Third Quarter	Review and edit motion, brief and exhibits
960	6/6/2024	KLM	0.170	\$1,057.00	\$179.69	2023 Application	Consent Motion, Third Quarter	Review and edit updates to KLM declaration and resume exhibit
961	5/29/2024	ZSF	2.338	\$878.00	\$2,052.76	2023 Application	Consent Motion, Third Quarter	Draft third quarter consent motion, supporting brief, declarations, proposed order, motion to place notice, notice, proposed order, and identify needed exhibits
962	5/30/2024	ZSF	0.200	\$878.00	\$175.60	2023 Application	Consent Motion, Third Quarter	Review revised exhibits
963	6/3/2024	ZSF	0.369	\$1,057.00	\$390.03	2023 Application	Consent Motion, Third Quarter	Review KLM edits to motions, brief, orders and declarations (17 min.); provide instructions to DAP for review (5 min)
964	6/5/2024	ZSF	1.258	\$1,057.00	\$1,329.71	2023 Application	Consent Motion, Third Quarter	Review DAP review of all materials, including edits to declarations, redactions to time records, proposed orders

Matter: Fees - 0808

Monday, September 23, 2024

<i>No.</i>	<i>Date</i>	<i>Ind.</i>	<i>Time</i>	<i>Rate</i>	<i>Fees</i>	<i>Category</i>	<i>Subcategory</i>	<i>Description</i>
965	6/6/2024	ZSF	0.494	\$1,057.00	\$522.16	2023 Application	Consent Motion, Third Quarter	Review KLM edits to declaration and exhibit (9 min); instructions to DAP to revise exhibit (4 min.); review proof and cite edits in brief and proposed orders (10 min.); review final time and expense exhibits (6 min)
966	6/7/2024	ZSF	0.263	\$1,057.00	\$277.99	2023 Application	Consent Motion, Third Quarter	File 2023 Q3 third quarter application for fees and related motion for order directing clerk of the court to place notice on court website
967	6/28/2024	AIN	3.070	\$239.00	\$733.73	2024 Submissions	Settlement Submission, First Quarter	Prepare exhibits (1 hr 32 min); proof and cite check letter (1 hr 32 min)
968	6/13/2024	KLM	0.356	\$1,057.00	\$376.29	2024 Submissions	Settlement Submission, First Quarter	Review time records and other exhibits to provide to defendants
969	6/27/2024	KLM	0.243	\$1,057.00	\$256.85	2024 Submissions	Settlement Submission, First Quarter	Review and edit letter to defendants and two fees exhibits
970	5/28/2024	ZSF	1.488	\$878.00	\$1,306.46	2024 Submissions	Settlement Submission, First Quarter	Review categories and subcategories of time
971	6/5/2024	ZSF	0.085	\$1,057.00	\$89.85	2024 Submissions	Settlement Submission, First Quarter	Review time records exhibit for co-counsel
972	6/11/2024	ZSF	0.208	\$1,057.00	\$219.86	2024 Submissions	Settlement Submission, First Quarter	Revise expense exhibit and send time and expense exhibits to KLM for review
973	6/26/2024	ZSF	0.088	\$1,057.00	\$93.02	2024 Submissions	Settlement Submission, First Quarter	Draft settlement letter
974	6/27/2024	ZSF	1.250	\$1,057.00	\$1,321.25	2024 Submissions	Settlement Submission, First Quarter	Draft settlement letter
975	6/28/2024	ZSF	0.684	\$1,057.00	\$722.99	2024 Submissions	Settlement Submission, First Quarter	Review KLM and AIN edits to settlement letter and exhibits

Salazar v. District of Columbia
D.D.C., Civil Action No. 93-452 (TSC)

Terris, Pravlik & Millian, LLP

Summary of Time by Billing Client and Category

April 1, 2024 to June 30, 2024

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
AJ - DC Court of Appeals - 5056							
	EPSDT - Fair Hearing						
		Def Supplemental Brief					
			<u>Attorneys</u>				
			KLM	0.250	\$196.00	\$49.00	
			ZSF	0.593	\$196.00	\$116.23	
			Subcategory Sub-Total:				\$165.23
		Pl Supplemental Brief					
			<u>Attorneys</u>				
			KLM	5.428	\$196.00	\$1,063.89	
			NFS	3.147	\$196.00	\$616.81	
			ZSF	40.004	\$196.00	\$7,840.78	
			<u>Paralegals/Law Clerks</u>				
			ATH	1.338	\$196.00	\$262.25	
			Subcategory Sub-Total:				\$9,783.73

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Scheduling Order

Attorneys

KLM	0.420	\$196.00	\$82.32
ZSF	0.431	\$196.00	\$84.48

Subcategory Sub-Total: \$166.80

Matter Sub-Total: 51.611 \$10,115.76

AD, a minor

EPSDT

Attorneys

ZSF	1.498	\$196.00	\$293.61
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Paralegals/Law Clerks

AIN	0.050	\$196.00	\$9.80
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Subcategory Sub-Total: \$303.41

Matter Sub-Total: 1.548 \$303.41

AD-MD, minors

EPSDT

Paralegals/Law Clerks

AIN	2.350	\$196.00	\$460.60
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Subcategory Sub-Total: \$460.60

Matter Sub-Total: 2.350 \$460.60

Matter: AD-MD, minors
Monday, September 23, 2024

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
AJ, a minor							
EPSDT							
			<u>Attorneys</u>				
			ZSF	6.427	\$196.00	\$1,259.69	
			<u>Paralegals/Law Clerks</u>				
			ATH	6.984	\$196.00	\$1,368.86	
			Subcategory Sub-Total:				\$2,628.56
Reimbursement							
			<u>Attorneys</u>				
			ZSF	0.317	\$196.00	\$62.13	
			<u>Paralegals/Law Clerks</u>				
			ATH	0.166	\$196.00	\$32.54	
			Subcategory Sub-Total:				\$94.67
EPSDT MCO Grievance							
			<u>Paralegals/Law Clerks</u>				
			ATH	0.343	\$196.00	\$67.23	
			Subcategory Sub-Total:				\$67.23
Matter Sub-Total:				14.237			\$2,790.45

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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AO and JO, minors

EPSDT

Attorneys

KLM	0.286	\$196.00	\$56.06
ZSF	26.095	\$196.00	\$5,114.62

Paralegals/Law Clerks

ATH	10.020	\$196.00	\$1,963.92
AIN	0.126	\$196.00	\$24.70

Subcategory Sub-Total: \$7,159.29

EPSDT MCO Grievance

Attorneys

ZSF	9.210	\$196.00	\$1,805.16
KLM	2.096	\$196.00	\$410.82

Paralegals/Law Clerks

ATH	12.525	\$196.00	\$2,454.90
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Subcategory Sub-Total: \$4,670.88

Matter Sub-Total: 60.358 \$11,830.17

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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AP, a minor

EPSDT

Attorneys

ACA	0.330	\$196.00	\$64.68
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Paralegals/Law Clerks

ATH	4.027	\$196.00	\$789.29
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AIN	0.218	\$196.00	\$42.73
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Subcategory Sub-Total:			\$896.70
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Matter Sub-Total:	4.575		\$896.70
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BC, a minor

EPSDT

Attorneys

ZSF	0.732	\$196.00	\$143.47
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Paralegals/Law Clerks

ATH	3.062	\$196.00	\$600.15
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Subcategory Sub-Total:			\$743.62
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Reimbursement

Attorneys

ZSF	0.025	\$196.00	\$4.90
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Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Paralegals/Law Clerks

ATH	0.987	\$196.00	\$193.45
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Subcategory Sub-Total:			\$198.35
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EPSDT MCO GrievanceAttorneys

ZSF	0.794	\$196.00	\$155.62
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Paralegals/Law Clerks

ATH	1.601	\$196.00	\$313.80
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Subcategory Sub-Total:			\$469.42
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Matter Sub-Total:	7.201		\$1,411.40
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ReimbursementAttorneys

ZSF	1.174	\$196.00	\$230.10
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KLM	0.115	\$196.00	\$22.54
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Subcategory Sub-Total:			\$252.64
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MCO Appeal - ReimbursementAttorneys

KLM	0.689	\$196.00	\$135.04
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Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
			ZSF	3.582	\$196.00	\$702.07	
			<u>Paralegals/Law Clerks</u>				
			AIN	4.805	\$196.00	\$941.78	
			ATH	0.749	\$196.00	\$146.80	
			Subcategory Sub-Total:				\$1,925.70
	EPSDT MCO Grievance						
			<u>Attorneys</u>				
			KLM	1.626	\$196.00	\$318.70	
			ZSF	1.080	\$196.00	\$211.68	
			<u>Paralegals/Law Clerks</u>				
			AIN	2.258	\$196.00	\$442.57	
			Subcategory Sub-Total:				\$972.94
		Matter Sub-Total:		16.078			\$3,151.29
CD, a minor							
	EPSDT						
			<u>Attorneys</u>				
			KLM	0.100	\$196.00	\$19.60	
			ZSF	1.993	\$196.00	\$390.63	
			<u>Paralegals/Law Clerks</u>				
			DAP	2.834	\$196.00	\$555.46	
			Subcategory Sub-Total:				\$965.69

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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ReimbursementAttorneys

ZSF	1.543	\$196.00	\$302.43
MLH	1.121	\$196.00	\$219.72
KLM	0.550	\$196.00	\$107.80

Paralegals/Law Clerks

DAP	1.983	\$196.00	\$388.67
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Subcategory Sub-Total: \$1,018.61

MCO Appeal - ReimbursementAttorneys

ZSF	11.552	\$196.00	\$2,264.19
KLM	3.964	\$196.00	\$776.94

Paralegals/Law Clerks

AIN	2.284	\$196.00	\$447.66
DAP	20.701	\$196.00	\$4,057.40
ATH	0.230	\$196.00	\$45.08

Subcategory Sub-Total: \$7,591.28

Matter Sub-Total: 48.855 \$9,575.58

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Reimbursement

Paralegals/Law Clerks

DAP	0.267	\$196.00	\$52.33
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Subcategory Sub-Total: \$52.33

MCO Appeal - Reimbursement

Paralegals/Law Clerks

DAP	0.100	\$196.00	\$19.60
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Subcategory Sub-Total: \$19.60

Reimbursement - Fair Hearing

Attorneys

ZSF	1.766	\$196.00	\$346.14
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Paralegals/Law Clerks

DAP	0.499	\$196.00	\$97.80
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Subcategory Sub-Total: \$443.94

Matter Sub-Total: 2.632 \$515.87

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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CS, a minor

EPSDT

Attorneys

ZSF 0.062 \$196.00 \$12.15

Paralegals/Law Clerks

DAP 0.816 \$196.00 \$159.94

Subcategory Sub-Total: \$172.09

Matter Sub-Total: 0.878 \$172.09

CW, a minor

EPSDT MCO Appeal

Attorneys

ZSF 0.052 \$196.00 \$10.19

Subcategory Sub-Total: \$10.19

Reimbursement

Attorneys

ZSF 0.266 \$196.00 \$52.14

Paralegals/Law Clerks

DAP 0.117 \$196.00 \$22.93

Subcategory Sub-Total: \$75.07

Matter: CW, a minor
Monday, September 23, 2024

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Reimbursement - Fair HearingAttorneys

ZSF 1.216 \$196.00 \$238.34

KLM 0.028 \$196.00 \$5.49

Subcategory Sub-Total: \$243.82**Matter Sub-Total: 1.679 \$329.08****Reimbursement**Attorneys

ZSF 0.231 \$196.00 \$45.28

Paralegals/Law Clerks

DAP 0.633 \$196.00 \$124.07

Subcategory Sub-Total: \$169.34**Matter Sub-Total: 0.864 \$169.34****DC, a minor****EPSDT**Attorneys

ZSF 6.992 \$196.00 \$1,370.43

Paralegals/Law Clerks

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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AIN 0.161 \$196.00 \$31.56

DAP 0.200 \$196.00 \$39.20

ATH 8.958 \$196.00 \$1,755.77

Subcategory Sub-Total: \$3,196.96

EPSDT MCO Grievance

Paralegals/Law Clerks

ATH 10.351 \$196.00 \$2,028.80

Subcategory Sub-Total: \$2,028.80

Matter Sub-Total: 26.662 \$5,225.75

DT, a minor

EPSDT

Attorneys

ZSF 0.865 \$196.00 \$169.54

Paralegals/Law Clerks

AIN 2.332 \$196.00 \$457.07

Subcategory Sub-Total: \$626.61

Matter Sub-Total: 3.197 \$626.61

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
DW, a minor							
	EPSDT						
		<u>Attorneys</u>					
		ZSF		5.776	\$196.00	\$1,132.10	
		<u>Paralegals/Law Clerks</u>					
		ATH		11.018	\$196.00	\$2,159.53	
		Subcategory Sub-Total:				\$3,291.62	
	Reimbursement						
		<u>Attorneys</u>					
		ZSF		1.669	\$196.00	\$327.12	
		KLM		2.074	\$196.00	\$406.50	
		<u>Paralegals/Law Clerks</u>					
		ATH		9.922	\$196.00	\$1,944.71	
		DAP		0.117	\$196.00	\$22.93	
		AIN		0.616	\$196.00	\$120.74	
		Subcategory Sub-Total:				\$2,822.01	
		Matter Sub-Total:		31.192		\$6,113.63	

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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EC2, a minor

EPSDT

Attorneys

KLM 0.071 \$196.00 \$13.92

ZSF 0.734 \$196.00 \$143.86

Paralegals/Law Clerks

AIN 1.691 \$196.00 \$331.44

ATH 0.076 \$196.00 \$14.90

Subcategory Sub-Total: \$504.11

Matter Sub-Total: 2.572 \$504.11

EC3, a minor

EPSDT

Attorneys

ACA 2.840 \$196.00 \$556.64

Paralegals/Law Clerks

ATH 0.422 \$196.00 \$82.71

AIN 6.118 \$196.00 \$1,199.13

Subcategory Sub-Total: \$1,838.48

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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ReimbursementAttorneys

KLM	0.916	\$196.00	\$179.54
ZSF	0.598	\$196.00	\$117.21
ACA	1.550	\$196.00	\$303.80

Paralegals/Law Clerks

AIN	3.229	\$196.00	\$632.88
ATH	3.737	\$196.00	\$732.45

Subcategory Sub-Total: \$1,965.88

RecertificationAttorneys

ACA	1.630	\$196.00	\$319.48
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Subcategory Sub-Total: \$319.48

Matter Sub-Total: 21.040 \$4,123.84

RecertificationAttorneys

ZSF	0.431	\$196.00	\$84.48
KLM	0.116	\$196.00	\$22.74

Matter: JL, JL2, KD-J, minors
Monday, September 23, 2024

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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JY, a minor

EPSDT

Attorneys

ZSF 11.756 \$196.00 \$2,304.18

KLM 0.250 \$196.00 \$49.00

Paralegals/Law Clerks

ATH 0.185 \$196.00 \$36.26

AIN 21.403 \$196.00 \$4,194.99

Subcategory Sub-Total: \$6,584.42

Matter Sub-Total: 33.594 \$6,584.42

KJ, a minor

EPSDT

Attorneys

ZSF 7.692 \$196.00 \$1,507.63

KLM 0.323 \$196.00 \$63.31

Paralegals/Law Clerks

ATH 2.260 \$196.00 \$442.96

Subcategory Sub-Total: \$2,013.90

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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EPSDT MCO AppealAttorneys

ZSF	1.192	\$196.00	\$233.63
KLM	0.420	\$196.00	\$82.32
JAD	9.088	\$196.00	\$1,781.25

Paralegals/Law Clerks

ATH	4.514	\$196.00	\$884.74
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Subcategory Sub-Total:	\$2,981.94
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Matter Sub-Total:	25.489	\$4,995.84
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KM, a minor

EPSDTParalegals/Law Clerks

ATH	0.585	\$196.00	\$114.66
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Subcategory Sub-Total:	\$114.66
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ReimbursementAttorneys

ZSF	0.489	\$196.00	\$95.84
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Paralegals/Law Clerks

DAP	1.200	\$196.00	\$235.20
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Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Subcategory Sub-Total: \$331.04

MCO Appeal - Reimbursement

Paralegals/Law Clerks

DAP 0.083 \$196.00 \$16.27

Subcategory Sub-Total: \$16.27

Matter Sub-Total: 2.357 \$461.97

LC, a minor

EPSDT

Attorneys

ACA 13.270 \$196.00 \$2,600.92

ZSF 0.249 \$196.00 \$48.80

Paralegals/Law Clerks

ATH 1.751 \$196.00 \$343.20

DAP 13.332 \$196.00 \$2,613.07

Subcategory Sub-Total: \$5,605.99

EPSDT MCO Grievance

Paralegals/Law Clerks

DAP 0.583 \$196.00 \$114.27

Subcategory Sub-Total: \$114.27

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
Matter Sub-Total:				29.185			\$5,720.26
LJ, a minor							
	EPSDT						
			<u>Attorneys</u>				
			ZSF	0.164	\$196.00	\$32.14	
			Subcategory Sub-Total:				\$32.14
	Recertification						
			<u>Attorneys</u>				
			ACA	0.430	\$196.00	\$84.28	
			<u>Paralegals/Law Clerks</u>				
			AIN	1.102	\$196.00	\$215.99	
			Subcategory Sub-Total:				\$300.27
		Matter Sub-Total:		1.696			\$332.42
LM, a minor							
	EPSDT						
			<u>Attorneys</u>				
			MLH	1.063	\$196.00	\$208.35	
			ZSF	0.450	\$196.00	\$88.20	
			Subcategory Sub-Total:				\$296.55
Matter: LM, a minor							
Monday, September 23, 2024							

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
Matter Sub-Total:				1.513			\$296.55
MB-S, a minor							
	EPSDT						
			<u>Attorneys</u>				
			ZSF	1.001	\$196.00	\$196.20	
			<u>Paralegals/Law Clerks</u>				
			DAP	1.500	\$196.00	\$294.00	
			Subcategory Sub-Total:				\$490.20
Matter Sub-Total:				2.501			\$490.20
MD, a minor							
	EPSDT						
			<u>Attorneys</u>				
			ZSF	0.158	\$196.00	\$30.97	
			<u>Paralegals/Law Clerks</u>				
			AIN	0.468	\$196.00	\$91.73	
			Subcategory Sub-Total:				\$122.70
Matter Sub-Total:				0.626			\$122.70

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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MS, a minor

EPSDT

Attorneys

ZSF	1.819	\$196.00	\$356.52
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Paralegals/Law Clerks

AIN	0.128	\$196.00	\$25.09
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ATH	12.382	\$196.00	\$2,426.87
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Subcategory Sub-Total: \$2,808.48

Matter Sub-Total: 14.329 \$2,808.48

SJ, a minor

EPSDT

Paralegals/Law Clerks

AIN	0.140	\$196.00	\$27.44
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Subcategory Sub-Total: \$27.44

Matter Sub-Total: 0.140 \$27.44

VF, a minor

EPSDT

Attorneys

ZSF	2.975	\$196.00	\$583.10
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Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals	
			<u>Paralegals/Law Clerks</u>					
			DAP	0.433	\$196.00	\$84.87		
			Subcategory Sub-Total:					\$667.97
		Matter Sub-Total:		3.408			\$667.97	
Medicaid Salazar Individual Claims								
EPSDT								
			<u>Paralegals/Law Clerks</u>					
			ATH	0.943	\$196.00	\$184.83		
			AIN	1.409	\$196.00	\$276.16		
			Subcategory Sub-Total:					\$460.99
		Reimbursement						
			<u>Attorneys</u>					
			ZSF	0.070	\$196.00	\$13.72		
			Subcategory Sub-Total:					\$13.72
		Recertification						
			<u>Paralegals/Law Clerks</u>					
			AIN	1.915	\$196.00	\$375.34		
			ATH	0.776	\$196.00	\$152.10		
			Subcategory Sub-Total:					\$527.44
Matter: Medicaid Salazar Individual Clai								
Monday, September 23, 2024								
Page 23 of 30								

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Referral for Non-Class MemberAttorneys

ZSF	0.250	\$196.00	\$49.00
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Paralegals/Law Clerks

ATH	0.281	\$196.00	\$55.08
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AIN	0.820	\$196.00	\$160.72
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Subcategory Sub-Total:			\$264.80
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Case ManagementAttorneys

KLM	8.940	\$196.00	\$1,752.24
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ZSF	15.239	\$196.00	\$2,986.84
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Paralegals/Law Clerks

DAP	14.449	\$196.00	\$2,832.00
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AIN	11.940	\$196.00	\$2,340.24
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ATH	15.568	\$196.00	\$3,051.33
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Subcategory Sub-Total:			\$12,962.66
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Matter Sub-Total:	72.600		\$14,229.60
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Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
PJ Monitoring - 0988							
	EPSDT						
		CMS Form 416					
			<u>Attorneys</u>				
			ZSF	1.757	\$523.00	\$918.91	
							Subcategory Sub-Total: \$918.91
		Escrow Oversight					
			<u>Attorneys</u>				
			ZSF	0.143	\$523.00	\$74.79	
							Subcategory Sub-Total: \$74.79
		MCAC Meeting					
			<u>Attorneys</u>				
			ZSF	0.452	\$523.00	\$236.40	
			<u>Paralegals/Law Clerks</u>				
			ATH	2.885	\$196.00	\$565.46	
			AIN	2.000	\$196.00	\$392.00	
							Subcategory Sub-Total: \$1,193.86
		Monitoring Compliance					
			<u>Attorneys</u>				
			ZSF	6.644	\$523.00	\$3,474.81	
			<u>Paralegals/Law Clerks</u>				
			ATH	0.916	\$196.00	\$179.54	

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
			DAP	0.514	\$196.00	\$100.74	
			Subcategory Sub-Total:				\$3,755.09
		Open Records Appeal (FOIA, etc)					
		<u>Attorneys</u>					
			NFS	0.711	\$523.00	\$371.85	
			TAG	8.553	\$523.00	\$4,473.22	
			ZSF	0.369	\$523.00	\$192.99	
			KLM	0.692	\$693.00	\$479.56	
		<u>Paralegals/Law Clerks</u>					
			ATH	0.989	\$196.00	\$193.84	
			Subcategory Sub-Total:				\$5,711.46
		Open Records Request (FOIA Request)					
		<u>Attorneys</u>					
			ZSF	0.382	\$523.00	\$199.79	
			Subcategory Sub-Total:				\$199.79
		Open Records Response (FOIA Response)					
		<u>Attorneys</u>					
			ZSF	0.707	\$523.00	\$369.76	
			Subcategory Sub-Total:				\$369.76
		Paragraph 48(b) Report					
		<u>Attorneys</u>					
			ZSF	0.283	\$523.00	\$148.01	
			KLM	0.080	\$693.00	\$55.44	

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Subcategory Sub-Total: \$203.45

Participant Ratio CAP

Attorneys

KLM 0.100 \$693.00 \$69.30

ZSF 14.113 \$523.00 \$7,381.10

Subcategory Sub-Total: \$7,450.40

Transportation Assistance

Attorneys

ZSF 1.682 \$523.00 \$879.69

KLM 0.435 \$693.00 \$301.46

Paralegals/Law Clerks

ATH 0.232 \$196.00 \$45.47

Subcategory Sub-Total: \$1,226.61

ECF Management

Paralegals/Law Clerks

ATH 0.304 \$196.00 \$59.58

AIN 0.556 \$196.00 \$108.98

Subcategory Sub-Total: \$168.56

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
	Settlement						
		Mediation Follow-Up					
			<u>Attorneys</u>				
			ZSF	11.689	\$523.00	\$6,113.35	
			KLM	4.449	\$693.00	\$3,083.16	
			<u>Paralegals/Law Clerks</u>				
			ATH	0.817	\$196.00	\$160.13	
			Subcategory Sub-Total:			\$9,356.64	
		Mediation Preparation					
			<u>Attorneys</u>				
			KLM	7.720	\$693.00	\$5,349.96	
			TAG	1.530	\$523.00	\$800.19	
			ZSF	14.412	\$523.00	\$7,537.48	
			<u>Paralegals/Law Clerks</u>				
			ATH	0.182	\$196.00	\$35.67	
			Subcategory Sub-Total:			\$13,723.30	
		Mediation Session					
			<u>Attorneys</u>				
			ZSF	4.392	\$523.00	\$2,297.02	
			KLM	4.440	\$693.00	\$3,076.92	
			Subcategory Sub-Total:			\$5,373.94	

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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Status Report(s)

Attorneys

ZSF 0.210 \$523.00 \$109.83

Subcategory Sub-Total: \$109.83

Matter Sub-Total: 95.340 \$49,836.38

Fees - 0808

2023 Submissions

Negotiations with Def

Attorneys

ZSF 0.321 \$878.00 \$281.84

Subcategory Sub-Total: \$281.84

2023 Application

Consent Motion, Third Quarter

Attorneys

ZSF 2.384 \$1,057.00 \$2,519.89

ZSF 2.538 \$878.00 \$2,228.36

KLM 0.683 \$1,057.00 \$721.93

Paralegals/Law Clerks

DAP 6.537 \$239.00 \$1,562.34

Subcategory Sub-Total: \$7,032.53

Matter	Category	Subcategory	Individuals	Hours	Rate	Fees	Subtotals
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2024 Submissions

Settlement Submission, First Quarter

Attorneys

ZSF	1.488	\$878.00	\$1,306.46
KLM	0.599	\$1,057.00	\$633.14
ZSF	2.315	\$1,057.00	\$2,446.96

Paralegals/Law Clerks

AIN	3.070	\$239.00	\$733.73
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Subcategory Sub-Total:	\$5,120.29
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Matter Sub-Total:	19.935	\$12,434.66
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Grand Totals:	609.109	\$159,062.50
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Salazar v. District of Columbia**D.D.C., Civil No. 93-452 (TSC)**

Terris, Pravlik & Millian, LLP

Summary of Expenses by Category

April 1, 2024 to June 30, 2024

Matter	Category	Expense
Medicaid Salazar Individual Claims	Document Production B&W	\$1.80
	Postage	\$0.68
	Westlaw	\$475.58
	Matter Sub-Total:	\$478.06
PJ Monitoring - 0988	Document Production B&W	\$12.15
	PACER	\$0.90
	Westlaw	\$9.34
	Matter Sub-Total:	\$22.39
Total Expenses:		\$500.45

NHELP

1512 E. Franklin St., Suite 110

Chapel Hill, NC 27514

Salazar 2024 Second Quarter**Plaintiffs' Exhibit****9**

Civ. No. 93-452 (TSC)

This Time Sheet Log Goes

From: 4/2024 To: 6/2024

Date	Activity	Rate @ \$637/hr	Fees
4/16/2024	Review 3/22 DC proposal	0.4	\$254.80
4/16/2024	Confer with TPM re: DC proposal and our responses	1	\$637.00
4/17/2024	CW [REDACTED] re: being an expert to DC	0.5	\$318.50
4/23/2024	Research incentives/withholds	0.2	\$127.40
4/23/2024	Mediation	2.6	\$1,656.20
5/24/2024	Review DC Response to Plf Settlement Suggestions	0.2	\$127.40
	Total		\$3,121.30

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

OSCAR SALAZAR, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, et al.,

Defendants.

Civil No. 93-452 (TSC)
In Forma Pauperis

DECLARATION OF JANE PERKINS

I, Jane Perkins, J.D., M.P.H., affirm as follows:

1. I am the Litigation Director of the National Health Law Program (“Health Law Program”). I have worked at the Health Law Program for over 40 years. The Health Law Program is a non-profit law firm that provides consultation and co-counseling assistance to legal services, disability rights, and pro bono lawyers and to clients, nationwide, on the full range of health issues affecting the poor. My substantive areas of expertise are Medicaid, child health, and civil rights.

2. I am co-counsel with the firm of Terris, Pravlik & Millian, LLP, in this matter. I submit this declaration in support of the Plaintiffs’ unopposed motion for attorneys’ fees for the second quarter of 2024. I do not serve as an expert in this matter.

3. I received my J.D. from the University of North Carolina, Chapel Hill, in 1981 and a master’s degree in public health from the University of California, Berkeley, in 1982. I am admitted to the Bar in California, Maryland (inactive), and North Carolina. I am also admitted to practice before a number of federal district courts, including this Court, all of the courts of appeals, and the United States Supreme Court.

4. I have litigated numerous Medicaid class action cases. Recent cases include:

Rose v. Becerra, 2024 WL 3202342 (D.D.C. Jun 27, 2024) (vacating approval of Section 1115 waiver project to impose premiums and other coverage restrictions on Medicaid eligibility)

Gresham v. Azar, 950 F.3d 93 (D.C. Cir. 2020), *aff'g*, 363 F. Supp. 3d 165 (2019) (vacating approval of Section 1115 waiver project to impose work requirements and other coverage restrictions on Medicaid eligibility); *Stewart v. Azar*, 366 F. Supp. 3d 125 (D.D.C. 2019), *same case*, 313 F. Supp. 3d 237 (D.D.C. 2018) (same); *Philbrick v. Azar*, 397 F. Supp. 3d 11 (D.D.C. 2019) (same)

S.J. v. Tidball, 2020 WL 5440510 (W.D. Mo. Sept. 10, 2020) (denying motion to dismiss Medicaid EPSDT and ADA case on behalf of children with medically complex conditions)

O.B. v. Norwood, 838 F.3d 837 (7th Cir. 2016), *aff'g*, 170 F. Supp. 3d 1186 (N.D. Ill. 2016) (preliminary injunction requiring state Medicaid agency to arrange for EPSDT services the agency has found to be medically necessary)

Wilson v. Gordon, 822 F.3d 934 (6th Cir. 2016), *aff'g*, 2014 WL 4347807 (M.D. Tenn. Sept. 2, 2014) (preliminary injunction requiring Tennessee Medicaid agency to provide fair hearings to individuals whose Medicaid applications are delayed)

St. Louis Effort for AIDS v. Huff, 782 F.3d 1016 (8th Cir. 2015), *affirming*, 996 F. Supp. 2d 798 (W.D. Mo. 2014) (preliminary injunction), *on remand*, 2016 WL 1056595 (W.D. Mo. Mar. 16, 2016) (summary judgment) (finding restrictive state consumer assister law preempted by the Affordable Care Act)

Davis v. Shah, 821 F.3d 231 (2d Cir. 2016), *affirming in part & vacating in part*, 2013 WL 6451176 (W.D. N.Y. Dec. 9, 2013) (summary judgment), 2012 WL 1574944 (W.D. N.Y. May 3, 2012) (preliminary injunction) (requiring Medicaid coverage of orthotic shoes and compression stockings)

Garrido v. Dudek, 731 F.3d 1152 (11th Cir. 2013) (affirming in part and modifying in part permanent injunction requiring Medicaid coverage of ABA therapy services for autistic children)

K.C. v. Shipman, 716 F.3d 107 (4th Cir. 2013) (affirming preliminary injunction requiring Medicaid due process in managed care program)

Pashby v. Delia, 709 F.3d 307 (4th Cir. 2013) (affirming preliminary injunction requirement coverage of personal care services under Medicaid Act and ADA)

Wood v. Betlach, 2013 WL 474369 (D. Ariz. Feb. 7, 2013) (finding federal approval of

mandatory co-payments as part of Medicaid demonstration project arbitrary)

Newton-Nations v. Betlach, 660 F.3d 370 (9th Cir. 2011), reversing in part & affirming in part, 2010 WL 1266827 (D. Ariz. Mar. 29, 2010), same case, 316 F. Supp. 2d 883 (D. Ariz. 2004) (finding approval of Medicaid co-payment demonstration project violated Section 1115 of the Social Security Act)

Hiltibran v. Levy, 793 F. Supp. 2d 1108 (W.D. Mo. 2011) (Medicaid and ADA coverage of home health services (not a class action))

McCartney v. Cansler, 608 F. Supp. 2d 694 (E.D.N.C. 2009), affirmed *per curiam*, 382 F. App'x 334 (4th Cir. 2010) (Medicaid due process; sovereign immunity)

Crabtree v. Goetz, Civ. No. 3:08-0939, 2008 WL 5330506 (M.D. Tenn. Dec. 19, 2008) (Americans with Disabilities Act and Rehabilitation Act)

Lankford v. Sherman, 451 F.3d 496 (8th Cir. 2006) (Medicaid coverage of medical equipment)

Edmonds v. Levine, 417 F. Supp. 2d 1323 (S.D. Fla. 2006) (summary judgment) and 233 F.R.D. 638 (S.D. Fla. 2006) (class certification) (Medicaid coverage of drugs for their medically accepted indications)

Duffy v. Meconi, 395 F. Supp. 2d 132 (D. Del. 2005) (Medicaid residency requirements for institutionalized individuals)

Cyrus v. Walker, 409 F. Supp. 2d 748 (S.D. W.Va. 2005) (Medicaid home- and community-based waiver case; sovereign immunity) and 233 F.R.D. 467 (S.D. W. Va. 2005) (class certification)

Antrican v. Odom, 290 F.3d 178 (4th Cir. 2002), affirming, 158 Fed. Supp. 2d 663 (E.D.N.C. 2001) (allowing plaintiffs to proceed with Medicaid case, finding no Eleventh Amendment or Section 1983 bars)

5. My recent publications on Medicaid law include:

Somers & Perkins, *The Ongoing Racial Paradox of the Medicaid Program*, 16 J. Health and Life Sci. L. 96 (2022).

Perkins & Somers, *Medicaid's Gold Standard Coverage for Children and Youth: Past, Present, and Future*, 30 Annals Health L. & Life Sci. 153 (Summer 2021)

Perkins et al., *The Supreme Court Reinforces Barriers to Court Access: Cases from the 2019-2020 Term*, 13 Ne. U. L. Rev. 577 (2021)

Perkins & Cuello, *The Next Four Years: How Will Health Care Change?*, 46 ABA Human Rts. 4 (Mar. 2021)

Perkins, *The Affordable Care Act in Court-Litigation Continues Unabated*, 8 N.C. Med. J. 386 (Nov./Dec. 2020)

Perkins & Agrawal, *Protecting Rights of Children with Medical Complexity in an Era of Spending Reductions*, 141 Pediatrics S242 (Mar. 2018)

Perkins, *EPSDT's Role in Improving Child Vision, Hearing, and Oral Health*, 45 J. Law Med. & Ethics 65 (Spr. 2017)

Perkins, *Pin the Tail on the Donkey: Beneficiary Enforcement of the Medicaid Act over Time*, 9 St. Louis Univ. J. of Health L. & Pol. 207 (2016)

McGowan, Lee, Meneses, Perkins & Youdelman, *Civil Rights Laws as Tools to Advance Health in the 21st Century*, 37 Ann. Rev. Public Health 185 (2016)

Perkins, *Demanding Ascertainable Standards: Medicaid as a Case Study*, Clearinghouse Art. 1 (Mar. 2016)

Perkins & Singh, *ACA Implementation: The Court Challenges Continue*, 23 Annals of Health Law Health L. & Pol. Rvw. of Loyola U. Chicago Sch. of L. 59 (Spec. ed. 2014)

Perkins, et al., *The Supreme Court's 2012-2013 Term: Restrictions on Court Access Just "Too Darn Bad,"* 47 Clearinghouse Rev. J. of Poverty L. & Pol. 295 (Nov.-Dec. 2013)

Perkins, *Implications of the Supreme Court's ACA Medicaid Decision*, 41 J. of Law, Med. & Ethics, 77 (Spring 2013)

Perkins, *The Supreme Court's Affordable Care Act Decision on Medicaid Eligibility and the Aftermath*, 46 Clearinghouse Rev. J. of Poverty L. & Pol. 426 (Jan.-Feb. 2013)

Perkins, *Responding to Medicaid Service Cutbacks: An Advocate's Checklist*, 45 Clearinghouse Rev. J. of Poverty L. & Pol. 398 (Jan.-Feb. 2012)

Somers & Perkins, *Sunshine and Accountability: The Pursuit of Information on Quality in Medicaid Managed Care*, 5 St. Louis U. J. of Health L. & Pol. 153 (2011)

Perkins, et al., *The U.S. Supreme Court's 2009 Term: Justice Steven's Last Round in the Access Battle*, 44 Clearinghouse Rev. J. of Poverty L. & Pol. 342 (Nov.-Dec. 2010)

Perkins, *Pleading Standards after Iqbal and Twombly*, 43 Clearinghouse Rev. J. of Poverty L. and Pol. 507 (Mar.-Apr. 2010)

6. On the basis of paragraph 65 of the Settlement Order, in which I am identified by name as class counsel, I request that the Court award me fees at an hourly rate of \$693 for monitoring work in 2024.

7. Although my office is located in Chapel Hill, North Carolina, I do not have a local North Carolina law practice and do not charge any North Carolina clients for my services.

8. As Litigation Director of the Health Law Program, I have a national law practice in complex litigation enforcing the Constitution and the federal Medicaid statute on behalf of low-income people whom I do not charge for my services.

9. I have consistently been awarded fees or received fees in settlement at the forum rates for the market in which the lawsuit is pending.

10. I travel frequently around the United States for my work and I perform work on the cases I handle, as most lawyers do, by computer, electronic mail, videoconference, and telephone communication. Therefore, it does not matter where my office is located.

11. I record time contemporaneously throughout the day in one-tenth-hour intervals. My contemporaneous time records from April 1, 2024, through June 30, 2024, are set forth in Plaintiffs' Exhibit 9.

12. I have carefully reviewed my time entries for the *Salazar* case in order to exercise appropriate billing judgment. I have not sought compensation for any of my time that was unproductive or that would not be billed by me to a paying client.

13. In this fee application, I request a total of \$3,121.30.

I declare, pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the foregoing statements in this declaration are true and correct. Executed on this 27th day of March 2025.

/s/ Jane Perkins
Jane Perkins, J.D., M.P.H.

ALICIA CLARK ALCORN**LEGAL EXPERIENCE**

Terris, Pravlik & Millian, LLP*Associate, Aug 2004 - Aug. 2012*

Washington, D.C.

Partner, Sept. 2012 to present

- Complex litigation in federal courts involving environmental and civil rights laws
- Clean Water Act litigation - experience with jurisdictional issues, including constitutional standing, statutory standing, and mootness; fact and expert discovery; remedies, including injunctive relief and civil penalties; settlement; and attorneys' fees
- Resource Conservation and Recovery Act litigation - experience with fact and expert discovery; remedies; trial preparation; and settlement
- Settlement negotiations and mediation in complex environmental litigation under the Clean Water Act
- Monitor and enforce federal court judgments and Consent Decrees resulting from the settlement of Clean Water Act and Resource Conservation and Recovery Act litigation
- Supervise support staff assisting with litigation

Terris, Pravlik & Millian, LLP

Washington, D.C.

*Law Clerk**May 2002 - June 2004*

- Monitor the District of Columbia's compliance with court order in a class action suit regarding Medicaid services
- Assist individuals eligible for D.C. Medicaid to obtain reimbursement for monies spent out-of-pocket for medical services that should have been paid for by Medicaid
- Assist children eligible for D.C. Medicaid to obtain Early, Periodic, Screening, Diagnostic, and Treatment (E.P.S.D.T.) services
- Represent D.C. Medicaid class members in fair hearings and draft briefs and other papers required by the District of Columbia fair hearing regulations

Terris, Pravlik & Millian, LLP

Washington, D.C.

*Legal Assistant**March 1998 - August 2001*

- Assist with monitoring defendants' compliance with Consent Decrees in settled environmental suits and the District of Columbia's compliance with court order regarding Medicaid services
- Conduct research into case law, federal and state regulations, factual information, and environmental permit compliance information
- Draft affidavits and correspondence, and communicate with plaintiffs, members of plaintiff organizations, and class action clients
- Environmental permit compliance monitoring
- Worked on preparation of case pending before the Supreme Court by conducting factual research, interviewing members of plaintiff organizations, gathering information necessary for oral argument, and assisting in final edit of briefs

EDUCATION

George Mason University School of Law, Arlington, Virginia*J.D.*, May 2004

Member of the Association for Public Interest Law, officer 2002-2004

Hobart and William Smith College, Geneva, New York

B.A., June 1997

Major: ***Environmental Studies*** Minor: ***Biology***

Dean's List Academic Honors 1995-1997

BAR ADMISSIONS

- Admitted to Maryland Bar, 2004
- Admitted to District of Columbia Bar, 2005
- Admitted to U.S. District Court for the District of Columbia, 2011
- Admitted to U.S. Court of Appeals District of Columbia Circuit, 2011

Jaclyn Deitch

BAR ADMISSIONS

New York	February 2024
District of Columbia	June 2024
U.S. District Court: District of Columbia	December 2024

EDUCATION

Fordham University School of Law, New York, NY	May 2023
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Juris Doctor

Honors: Moot Court; Archibald R. Murray Public Service Award for completing over 1000 hours of pro bono and community service work during law school; Student Leadership Award for If/When/How: Lawyering for Reproductive Justice
Activities: If/When/How: Lawyering for Reproductive Justice (Executive Board); Constitutional Crisis Hotline (Student Contributor); Fordham Law Women

Columbia University Mailman School of Public Health, New York, NY	May 2018
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Master of Public Health, Department of Sociomedical Sciences

Emphasis in Sexuality, Sexual and Reproductive Health

Thesis: *A Review of New York State's Outdated Abortion Laws*

Activities: Sexual and Reproductive Health Action Group

University of California, Davis, Davis, CA	June 2013
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Bachelor of Arts, Psychology and Sociology

Minor in Women and Gender Studies

Honors Thesis: *Attitudes of Hasidic Women Toward Reproductive Practices*

Activities: Feminists for Equality

EXPERIENCE

Terris, Pravlik & Millian, LLP, Washington, DC	January 2024-Present
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Associate Attorney

- Litigate civil rights class actions in federal court, including developing litigation strategy, preparing affidavits, and drafting pleadings, motions, and oppositions
- Represent non-profit organizations in a FOIA lawsuit against the federal government
- Conduct discovery, including interviewing Plaintiffs, drafting discovery requests and responses, reviewing and producing documents, and second-chairing depositions
- Managed field research for expert report

New York Civil Liberties Union, New York, NY	January 2023-May 2023
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Legal Extern for NYCLU's Voting Rights Project

National Institute for Reproductive Health, New York, NY	May 2022-July 2022
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Legal Intern

NYC Department of Health and Mental Hygiene, New York, NY	June 2021-August 2021
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Legal Intern for the Office of the General Counsel

United Nations, New York, NY	July 2017-September 2017
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Policy Intern at DESA – Population Division

TODD A. GLUCKMAN

PROFESSIONAL EXPERIENCE

Terris, Pravlik & Millian, LLP

Partner (since 2015), Public Interest Litigation

Washington, DC

March 2011-Present

Representative Experience

- Lead counsel representing a class of children with disabilities that sued the District of Columbia in federal court for systemic violations of the Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act and obtained an injunction requiring improvements
- Represent a class of Medicaid beneficiaries, who have disabilities and are in nursing homes, suing the District of Columbia for failing to have an effective system to transition them to the community as required by federal law
- Represented a relator appealing the dismissal of a False Claims Act case in the Second Circuit
- Represented a plaintiff suing a Maryland college in federal court for disability discrimination and negligence
- Represented a plaintiff suing her former attorneys in District of Columbia Superior Court for legal malpractice committed in the course of her underlying employment discrimination action

White & Case LLP

Associate, Litigation and Arbitration

New York, NY

September 2006-March 2011

Representative Corporate Experience

- Lead associate in successful defense against a \$54 million breach of contract claim: managed 5 associates in an arbitration involving expedited discovery of over 850,000 pages of documents, 22 fact witness depositions, 4 expert depositions, extensive substantive briefing on claims, and two weeks of hearings
- Lead associate in successful defense against a \$1.5 billion *qui tam* claim in federal court related to payment of customs duties
- Represented pension funds opposing the 2009 bankruptcy sale of Chrysler, which raised issues of first impression under the Troubled Asset Relief Program (TARP), with responsibilities including drafting substantive briefs to the district court
- Lead associate in defense of a major U.S. bank in a complex fraud action in federal court related to the Adelphia cable company, with responsibilities including co-management of the discovery process for bank defendants

Representative Pro Bono Experience

- Lead counsel in the successful representation of a community activist in a state court action challenging the New York City Department of Housing Preservation and Development's arbitrary and capricious conduct regarding her property
- Represented an inmate in a federal court action against the State of New York for failure to provide adequate medical care
- Recipient of 2009 White & Case Award for Outstanding Commitment to Pro Bono Legal Services

inMotion Inc.

White & Case Extern, Matrimonial Litigator

New York, NY

January-April 2010

- inMotion provides free legal services to victims of domestic violence (www.inmotiononline.org)
- Litigated 6 divorces and 2 child support petitions pending before the New York Supreme and New York Family Courts requiring numerous court appearances
- Trial counsel for a heavily contested child support petition before the New York Family Court
- Successfully briefed and argued an alimony motion before the New York Supreme Court that more than doubled the client's income
- Extensive discovery practice related to attempts to identify funds hidden by recalcitrant adversaries

United States District Court for the District of Arizona

Law Clerk for the Honorable Frederick J. Martone

Phoenix, AZ

September 2005-August 2006

- Drafted civil litigation orders, assisted in the administration of trials, researched legal issues, and regularly observed court proceedings

TODD A. GLUCKMAN

EDUCATION

Cornell Law School

JD cum laude, May 2005, 3.65 GPA

- Articles Editor, Cornell International Law Journal
- Studied abroad at the Summer Institute of International and Comparative Law, Université Paris I Panthéon-Sorbonne, Paris, France, Summer 2003

Northwestern University

BA, March 2000, 3.71 GPA, Dean's List

- Majored in Political Science, Minored in Economics
- Studied abroad with Northwestern University in South Africa (Cape Town, Johannesburg, Grahamstown, and Durban), Summer 1998

The London School of Economics and Political Science

General Course (LSE year abroad program), 1998-1999

- Completed coursework in history, law, and economics

INTERNSHIPS AND OTHER EXPERIENCE

Tompkins/Tioga County Neighborhood Legal Services (January 2005-April 2005)

Ithaca, NY

Intern: Counseled low-income clients regarding government benefits including Supplemental Security Income, Medicaid and multi-family housing matters

United Nations Office of Legal Affairs, Treaty Section (August-December 2004)

New York, NY

Intern: Prepared memoranda in response to international law queries from United Nations member states and treaty drafting committees and updated content and citations for the *Summary of Practice of the Secretary-General as Depositary of Multilateral Treaties*

Bulletin of the Legal Information Institute (August 2003-May 2004)

Ithaca, NY

Editor: Wrote case summaries of New York Court of Appeals opinions for publication in an online journal that received over 10 million hits per week and that was distributed via email to over 2,000 direct subscribers

United Nations High Commissioner for Refugees (May-June 2003)

Geneva, Switzerland

Intern to Senior Liaison Officer for Human Rights (Department of International Protection): Researched issues related to humanitarian, human rights, and refugee law and wrote a note regarding American and British human rights treaty obligations during the military presence in Iraq that was distributed to the Department of International Protection and the UNHCR Field Office in Iraq

Study of Asian political, economic, and human rights issues (July 2000-Sep. 2001)

S.E. & Central Asia

Independent on-location study including site visits, study of relevant texts, and discussions with civil servants, aid workers, and laypersons—brief selection of countries and issues studied: Indonesia (ethnic and religious conflict under the relocation scheme), Malaysia (deforestation and land rights issues in Malaysian Borneo), Myanmar (the Ne Win regime and human rights issues), Uzbekistan and Turkmenistan (post-Soviet development and human rights abuses), Xinjiang Uighur Autonomous Region, China (human rights abuses and independence movements)

Eagle Scout, Boy Scouts of America (May 1992)

Phoenix, AZ

BAR ADMISSIONS

New York Bar (2006); District of Columbia Bar (2011); Oregon Bar (2018)

United States District Court for the Southern District of New York (2006)

United States District Court for the Eastern District of New York (2006)

United States District Court for the District of Columbia (2012)

United States Court of Appeals for the Second Circuit (2007)

United States Court of Appeals for the D.C. Circuit (2016)

MICHAEL L HUANG

PROFESSIONAL EXPERIENCE

Terris, Pravlik & Millian, LLP, Washington, D.C.

Partner, 2016-Present; *Associate*, 2012-2016

Plaintiff-side public interest litigator with expertise in environmental citizen suit enforcement and complex civil rights class actions in all phases of trial and appeals.

Representative environmental cases include:

- *Raritan Baykeeper v. NL Industries, Inc.*, D.N.J., Civ. No. 3:09-cv-04117, represent environmental groups in suit under the Clean Water Act and Resource Recovery and Conservation Act to remediate heavy metals contamination of river sediments.
- *PennEnvironment v. PPG Industries, Inc.*, W.D. Pa., Civ. No. 2:12-cv-3442, represent environmental groups in suit under the Clean Water Act, Resource Recovery and Conservation Act, and Pennsylvania Clean Streams Act to remediate heavy metals contamination of waste site.

Representative civil rights cases include:

- *Maldonado v. District of Columbia*, D.D.C., Civ. No. 10-cv-1511, represent class of Medicaid beneficiaries in suit under U.S. Constitution to ensure procedural due process when Medicaid coverage of prescription drugs is denied. Briefed and argued appeal in *Maldonado v. District of Columbia*, 61 F.4th 1004 (D.C. Cir. 2023).
- *DL v. District of Columbia*, D.D.C., Civ. No. 05-cv-1437, represent class of preschool-age children in suit under the Individuals with Disabilities in Education Act, participated in appeal and fees litigation.

Judge Erik P. Christian, D.C. Superior Court, Washington, D.C.

Law Clerk, 2010-2012

Prepared bench memoranda, orders, and opinions for high-volume civil docket.

State & Local Legal Center, Washington, D.C.

Associate Counsel, 2007-2009

Co-authored *amicus curiae* merits briefs in the United States Supreme Court on behalf of state and local government organizations in cases involving constitutional and statutory issues implicating government regulation and policy.

Appellate Litigation Clinic, Georgetown University Law Center, Washington, D.C.

Student Counsel, 2006-2007

Fish & Richardson, P.C., San Diego, CA

Summer Associate, 2006

Public Defender Service for the District of Columbia, Washington, D.C.

Law Clerk, Appellate Division, 2005

ADMISSIONS

Supreme Court of the United States; D.C. Circuit; District Court for the District of Columbia; District of Columbia; New York.

RECOGNITIONS & COMMUNITY LEADERSHIP

Member, Standing Committee on the Federal Judiciary, American Bar Association (2023-present)

- Appointed by ABA President to three-year term as D.C. Circuit Representative.
- Provide impartial evaluations of professional qualifications for federal judicial nominees to the White House, Department of Justice, Senate Judiciary Committee, and the public.

Member, Nominations Committee, Asian Pacific American Bar Association - DC (APABA-DC) (2020-2023)

- Interview and recommend for endorsement candidates to the judiciary and other public offices.
- Prepare letters of endorsement.
- Identify and provide support to potential candidates to the judiciary, senior-level government, and D.C. Bar leadership, in order to promote increased diversity and representation in those positions.

Rising Star Award, APABA-DC (2019)

Co-Chair, Policy and Advocacy Committee, APABA-DC (2016-2017)

Secretary, Board of the Asian Pacific American Bar Association - DC Educational Fund (2012-2014).

EDUCATION

Georgetown University Law Center, Washington, DC, Juris Doctor, May 2007

Activities: *The Georgetown Law Journal* (Notes Editor); Appellate Litigation Clinic; Street Law Clinic (Roosevelt High School); Barrister's Council (Moot Court); Board, Asian-Pacific American Law Students Association

University of Michigan, Ann Arbor, Bachelor of Science in Philosophy and Economics, Minor in Biology, 2002

KATHLEEN L. MILLIAN

EXPERIENCE

Terris, Pravlik & Millian, LLP, Washington, DC

Attorney since 1987, *Partner* since 1992

Experienced federal court litigator. Successfully litigated class actions brought to vindicate civil rights and citizen suits to enforce the federal environmental laws. Represent the plaintiff class in a Medicaid class action against the District of Columbia government and in a class action under the Individuals with Disabilities in Education Act (IDEA), the Americans with Disabilities Act (ADA), and the Rehabilitation Act to vindicate the education rights of high school students at the D.C. Jail. Represent environmental groups in Clean Water Act and Resource Conservation and Recovery Act (RCRA) citizen enforcement suits.

Judge James K. Singleton, Alaska Court of Appeals, Anchorage, AK

Judicial Clerk, 1985-1986

REPRESENTATIVE CASES

- *Maldonado v. District of Columbia*, 61 F.4th 1004 (D.C. Cir. 2023), in which the Court of Appeals reversed the dismissal of a case asserting the due process rights of Medicaid recipients for the third time, finding that it was not moot and directing the district court to “proceed swiftly” to allow discovery and decide the issues in the case.
- *Charles H. v. District of Columbia*, 2021 WL 2946127 (D.D.C 2021), 2022 WL 1416645 (D.D.C. 2022), in which the district court issued a preliminary injunction and then a contempt order against the District of Columbia based on its failure to deliver special education and related services to high school students at the D.C. Jail who were eligible for those services under Individuals with Disabilities Education Act (IDEA).
- *Salazar, et al. v. District of Columbia*, 954 F. Supp. 278 (D.D.C. 1996), in which the district court found the government liable to the plaintiff class of Medicaid applicants and recipients under Section 1983 for failing to comply with the federal Medicaid statute.
- *Interfaith Community Organization, et al. v. Honeywell International Inc.*, 263 F.Supp.2d 796 (D.N.J. 2003), *aff’d*, 399 F.3d 248 (3d Cir. 2005), *cert. denied*, 545 U.S. 1129 (2005), in which the court of appeals affirmed liability under RCRA and the order to excavate and remove 1.5 million tons of toxic hexavalent chromium waste from a 34-acre site in Jersey City, NJ, and a clean-up of the deep ground water and sediments in the Hackensack River.
- *Public Interest Research Group of New Jersey, et al. v. Powell Duffryn Terminals Inc.*, 720 F. Supp. 1158 (D.N.J. 1989), *aff’d in part and rev’d in part*, 913 F.2d 64 (3d Cir. 1990), *cert. denied*, 498 U.S. 1109 (1991), which resulted in a permanent injunction against future Clean Water Act violations and a civil penalty of \$4.085 million.

EDUCATION

Stanford Law School, Stanford, CA, J.D., June 1985

Lawrason J. Driscoll Moot Court Award, Stanford Public Interest Law Foundation Summer Fellowship

Cornell University, Ithaca, NY, B.S., Public Policy, May 1982

BAR ADMISSIONS

State of New York, District of Columbia, United States Courts of Appeals for the District of Columbia, Third, Fourth, Fifth, Sixth, and Eleventh Circuits, and the United States Supreme Court.

ZENIA SANCHEZ FUENTES

EXPERIENCE

Terris, Pravlik & Millian, LLP, Washington, DC

Attorney since 2005, *Partner* since 2013

Litigate civil rights actions in the federal and administrative courts to vindicate the rights of Medicaid recipients and applicants under the Medicaid Act and litigate a class action to require the provision of special education to students under the Individuals with Disabilities in Education Act (IDEA), the Americans with Disabilities Act (ADA), and the Rehabilitation Act in the correctional setting.

Public Defender Service, Washington, DC

Law Clerk, Trial Division, June to August 2004

Performed legal research in support of clients' defense theories. Drafted motions and provided support in preliminary hearings. Met and interviewed clients in jail and assisted investigators in witness interviews.

Accenture, San Francisco, CA

Consultant, June 1997 to June 2002

Provided change management workstream transformation services to corporate clients, including implementation of software development process methodology, performance tracking, user acceptance testing, and development of training and communications programs for corporate-wide systems changes.

REPRESENTATIVE CASES

- *Salazar, et al. v. District of Columbia*, 954 F. Supp. 278 (D.D.C. 1996), take the lead in monitoring and enforcement of a consent decree for class-wide relief entered after the district court found the government liable to the class of Medicaid applicants and recipients under Section 1983 for failing to comply with the federal Medicaid statute.
- Represent individual class members in *Salazar, et al. v. District of Columbia*, 954 F. Supp. 278 (D.D.C. 1996), in appeals against managed care plans, fair hearings before the District of Columbia Office of Administrative Hearing, and appeals before the District of Columbia Court of Appeals, to challenge the denial, termination, or suspension of Medicaid eligibility and services.
- *Charles H. v. District of Columbia*, 2021 WL 2946127 (D.D.C. 2021), chief drafter of the preliminary injunction motion which was granted by the district court to enjoin the District of Columbia to provide special education and related services to students at the DC Jail during the COVID-19 pandemic.

EDUCATION

The George Washington University Law School, Washington, DC, J.D., May 2005

George Washington University Public Interest Grantee

Texas A&M University, College Station, Texas, B.A. International Studies, B.A. Economics, May 1997

President's Achievement Award, 1993, LT. Jordan Institute of International Affairs Fellowship, 1996

BAR ADMISSIONS

Maryland, District of Columbia, United States Court of Appeals for the District of Columbia Circuit and the United States District Court for the District of Columbia.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

OSCAR SALAZAR, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, et al.,

Defendants.

Civil No. 93-452 (TSC)

In Forma Pauperis

ORDER

WHEREAS, more than 30 days have passed from the date that the Clerk of the Court placed the Notice to the Plaintiff Class on the Court's website in accordance with Rule 23(h)(1) of the Federal Rules of Civil Procedure and this Court's Order of July 19, 2004 (ECF 1029);

Upon consideration of Plaintiffs' Unopposed Motion for an Award of Litigation Costs, Including Attorneys' Fees and Expenses, for the Second Quarter of 2024, the briefs and exhibits submitted in support of the motion, and the lack of opposition thereto, it is this ____ day of _____ 2025;

ORDERED, that counsel for the Plaintiff class are awarded \$138,281.61 for their attorneys' fees and expenses; and it is further

ORDERED, that Defendants shall pay Terris, Pravlik & Millian, LLP, \$138,281.61 within 30 days of this Order; and it is further

ORDERED, that, unless payment is made on or before 30 days from the entry of this Order, Defendants shall pay interest in accordance with 28 U.S.C. §1961 accruing from the date of this Order.

SO ORDERED.

THE HONORABLE TANYA S. CHUTKAN
UNITED STATES DISTRICT JUDGE