

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

| | | |
|-----------------------------------|---|----------------------------|
| CYNTHIA B. SCOTT, <i>et al.</i> , |) | |
| |) | |
| <i>Plaintiffs,</i> |) | |
| |) | Case No. 3:12-cv-00036-NKM |
| v. |) | Sr. Judge Norman K. Moon |
| |) | |
| HAROLD W. CLARKE, <i>et al.</i> , |) | |
| |) | |
| <i>Defendants.</i> |) | |
| _____ |) | |

DECLARATION OF DEBORAH GOLDEN

I, Deborah Golden, do hereby declare under penalty of perjury:

1. My name is Deborah Golden. I am over eighteen years of age and I have personal knowledge of the facts set forth herein, and would testify to them if asked to do so.
2. I have been employed as an attorney in the DC Prisoners’ Project of the Washington Lawyers Committee for Civil Rights and Urban Affairs (“WLC”) since 2007. I have been director of the DC Prisoners’ Project since 2013.
3. From 2000 until 2007, I was an attorney employed with the DC Prisoners’ Legal Services Project, which merged with the WLC in 2007.
4. From 1998 until 2000, I was a Skadden Fellow with the Appalachian Research and Defense Fund of Kentucky, in Pikeville, KY, representing survivors of domestic violence.
5. I received my Juris Doctor degree from the University of Michigan in 1998. In 1995, I was awarded a B.S. in physics and a B.A. in Russian Language by the Pennsylvania State University
6. I am a member in good standing in the bars of Kentucky and the District of Columbia. I am

also admitted to the United States District Courts of Colorado, the District of Columbia, Eastern District of Kentucky, and Maryland, and the United States Courts of Appeals for the District of Columbia and the Third Circuit.

7. Since 2011, I have been an Adjunct Professor at the Georgetown University Law Center, teaching courses related to prisoner rights litigation, including currently Prison Advocacy and Litigation.
8. I have litigated or am currently litigating a number of class actions and other cases involving prison conditions and prisoners' rights, including the following examples:
 - a. *Jarboe v. Maryland Department of Corrections*, No. 1:12-cv-00572 (D. Md. 2012).
 - b. *Cunningham v. FBOP*, 1:12-cv-01570 (D. Colo. 2012);
 - c. *Doe v. Wooten et al.*, 1:07-cv-02764 (N.D. Ga. 2007);
 - d. *Womack v. Smith et al.*, 1:06-cv-02348 (M.D. Pa. 2006);
 - e. *Anderson et al. v. Fenty et al.*, No. 2005 CA B (Superior Court for the District of Columbia 2005);
 - f. *Beale et al. v. District of Columbia et al.*, No. 1:04-cv-0959 (D.D.C. 2004); and
 - g. *Wright et al. v. CCA*, No. 1:00-cv-00293 (D.D.C. 2000).
9. I have also published a number of articles about prisoner rights litigation, including as examples:
 - a. *The Federal Bureau Of Prisons: Willfully Ignorant or Maliciously Unlawful?*, 18 Michigan Journal of Race and Law 275 (2013);
 - b. *Looking Behind the Locked Door: Prison Law Reform Proposals for the New Administration*, 3 Harvard Law & Policy Review Online 1 (2008); and
 - c. *The Prison Litigation Reform Act – A Proposal for Closing the Loophole for Rapists*, 1

Advance: The Journal of the American Constitution Society for Law and Policy Issue Groups 95 (2007).

10. As work on this case progressed, every biller at the WLC kept contemporaneous time records. A summary of those records is attached as Exhibit 1 to this Declaration.
11. A significant portion of my work on this case involved using my past experience to advise fellow litigation team members as to the best practices for developing a prisoner class action and making sure that all potential named plaintiffs exhaust administrative remedies.
12. My pre-filing contributions included advice on:
 - a. How to build trust in the plaintiff community;
 - b. How to seek information in a system which is by definition closed to outsiders;
 - c. How to vet plaintiff and witness claims;
 - d. How to narrow the pool of potential names plaintiffs to a group that satisfied both legal and practical concerns;
 - e. How to analyze a grievance policy both practically and legally; and
 - f. How to synthesize myriad individual stories into a coherent and legally sound Eighth Amendment argument.
13. My personal pre-filing work included but was not limited to:
 - a. Creating initial interview outlines;
 - b. Training and advising both Wiley Rein and LAJC attorneys on the nuances involved in prison interviews;
 - c. Creating a document that distilled the VDOC grievance policy into a form that individual women could understand; and
 - d. Reviewing potential plaintiffs for exhaustion of administrative remedies and potential

VDOC defenses thereto.

14. As described below, I largely stepped back from this litigation from 2010-2012, while Ms. Finkenstadt was the primary WLC attorney on the matter.
15. In 2012, I again became a more active member of the litigation team, focusing on trial strategy and the best way to present evidence, based on other prisoner litigation with which I am familiar.
16. Based on the Laffey Matrix, See *Laffey v. Northwest Airlines, Inc.*, 572 F. Supp. 354, 371 (D.D.C. 1983), *aff'd in part and rev'd in par on other grounds*, 746 F.2d 4 (D.C. Cir. 1984); *see also* http://www.justice.gov/sites/default/files/usao-dc/legacy/2013/09/09/Laffey_Matrix%202014.pdf (visited 10/19/2015), my billing rate in the District of Columbia during the period relevant to this matter would have been \$450 per hour.
17. The Prison Litigation Reform Act's fees limitations apply to this case, accordingly, I am seeking a rate of \$211.50/hr., which rate is explained in the Memorandum of Law filed in support of the Plaintiff's Petition.
18. In addition to my own work on this matter, WLC records reflect that there were three other attorneys who spent time litigating this case: Ivy Finkenstadt¹, Philip Fornaci, and Elliot Mincberg. Additionally, law student intern Benjamin Schwid contributed to the litigation by performing legal research in connection with preparation of the Plaintiffs' Motion to Strike The VDOC Defendants' Demand for Jury Trial (ECF Dkt. No. 158).

¹ Ivy Finkenstadt was employed by the WLC until the end of October 2012. Subsequently she was employed by the Legal Aid Justice Center ("LAJC"), and in that capacity also worked on this matter. Only her time while employed by the WLC is included in these calculations. Ms. Finkenstadt's time expended while employed by the LAJC is the subject of a separate declaration.

19. Ms. Finkenstadt graduated from law school in 2002. Her experience is detailed in her personal declaration, also attached as an Exhibit to this Memorandum.
20. Ms. Finkenstadt took over as primary WLC attorney on this matter from the time I was on maternity leave in 2010 until she left the WLC in October, 2012. Her billing records reflect that she continued to advise the litigation team based on WLC's collective and her individual experience.
21. Mr. Fornaci graduated from law school in 1991. Until his departure from WLC at the end of 2012, he was Director of the DC Prisoners' Project. His work on this case, as reflected in his contemporaneous billing records, was supervisory in nature.
22. Mr. Minberg joined the WLC in 2014 as a senior counsel. He graduated from law school in 1977. Since joining the WLC, his work on this case has been primarily to represent WLC at meetings and in discussions of strategy. His advice has focused on trial and pre-trial strategy, based on his many years litigating civil rights matters.
23. Laffey Matrix billing rates for each would be: Ms. Finkenstadt, \$450 / hour; Mr. Fornaci, \$505 / hour; Mr. Minberg, \$505 / hour; and Mr. Schwid, \$145 / hour.
24. Time spent by all billers is summarized in the chart below:

| Biller | Hours Spent | Laffey Matrix Rate | PLRA Rate | Hypothetical Total per Laffey | PLRA Capped Total |
|----------------|---------------|--------------------|-----------|-------------------------------|--------------------|
| D. Golden | 125.31 | \$450.00 | \$211.50 | \$56,389.95 | \$26,503.28 |
| I. Finkenstadt | 26.97 | \$450.00 | \$211.50 | \$12,135.15 | \$5,703.52 |
| P. Fornaci | 9.58 | \$510.00 | \$211.50 | \$4,887.33 | \$2,026.80 |
| E. Minberg | 53.5 | \$510.00 | \$211.50 | \$27,285.00 | \$11,315.25 |
| B. Schwid | .87 | \$145.00 | \$145.00 | \$125.57 | \$125.57 |
| Totals | 216.23 | | | \$100,823.00 | \$45,674.42 |

25. All itemized hours were reasonably and necessarily incurred due to the substantial nature

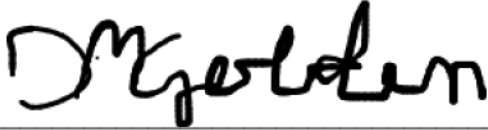
of the motions practice in the case, the breadth and duration of discovery, the time spent advising and consulting with the class representatives, significant amount of time spent reviewing the roughly 50,000 pages of discovery documents including medical records, significant amount of time spent preparing for the trial which was set to begin just a few days after the settlement was reached, as well as the time spent on pre-trial motions and in settlement negotiations, and the time spent preparing the motion papers seeking approval of the settlement.

26. Accordingly, WLC seeks a reasonable attorney's fee award of \$45,674.42. If we were to bill at regular rates, the hours spent would represent \$100,823.00 in fees, so applying the PLRA rate represents a 55% discount on our fees.
27. Additionally, per financial records, WLC bore \$903.83 in costs, comprised of the following:
 - a. Postage: \$3.13
 - b. Copying: \$644.40
 - c. Travel: \$204.37
 - d. Telephone and telefax: \$41.93
 - e. Court costs / filing fees: \$10.00
28. Because of the foregoing, I ask that the court find that the time WLC spent on this litigation was reasonable and necessary in light of the complexity of the issues involved and the posture of the case at the time of settlement, and award WLC attorneys' fees in the amount of \$45,674.42 and costs in the amount of \$903.83.

I declare under penalty of perjury that the foregoing is true and correct to the best of my

knowledge and belief.

Executed this 19th day of October, 2015, in Washington, District of Columbia.

A handwritten signature in black ink, appearing to read "D. Golden", written over a horizontal line.

Deborah M. Golden

Time Report with Fee Totals

| Transaction Date | Timekeeper | Timekeeper status | Description | Time Spent (optional rounding) | Per Hour Rate | Total | Market Rate | Market Total |
|------------------|------------------|-------------------|---|--------------------------------|---------------|-------------|-------------|--------------|
| 12/17/2008 | Golden, D | Attorney | Meet with LAJC and Wiley Rein to discuss possible case and preparation | 2.00 | \$ 211.50 | \$ 423.00 | \$ 450.00 | \$ 900.00 |
| 3/2/2009 | Finkenstadt, Ivy | Attorney | Meet with WR team to discuss upcoming client interviews | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 3/2/2009 | Golden, D | Attorney | Meet with WR team to discuss upcoming client interviews | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 3/20/2009 | Golden, D | Attorney | Prepare for trip to FCCW by figuring out what days we can go. | 0.17 | \$ 211.50 | \$ 35.53 | \$ 450.00 | \$ 75.60 |
| 3/24/2009 | Golden, D | Attorney | Review review interview notes that ted sent from helen to prepare for interviews thursday. | 0.58 | \$ 211.50 | \$ 122.88 | \$ 450.00 | \$ 261.45 |
| 3/25/2009 | Golden, D | Attorney | fluvanna trip to interview women | 13.00 | \$ 211.50 | \$ 2,749.50 | \$ 450.00 | \$ 5,850.00 |
| 5/1/2009 | Finkenstadt, Ivy | Attorney | Translate letter from inmate from Spanish to English to determine best way of handling her complaint | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 12/18/2009 | Golden, D | Attorney | Attend conference with T. Howard and G. Elber of ACLU re strategy | 2.00 | \$ 211.50 | \$ 423.00 | \$ 450.00 | \$ 900.00 |
| 3/26/2010 | Golden, D | Attorney | Review Review notes that Helen sent in preparation for our meeting on Monday. | 1.41 | \$ 211.50 | \$ 298.22 | \$ 450.00 | \$ 634.50 |
| 3/29/2010 | Fornaci, Phil | Attorney | Co-counsel at Wiley to discuss proposed plaintiffs, develop litigation plan | 3.00 | \$ 211.50 | \$ 634.50 | \$ 505.00 | \$ 1,515.00 |
| 3/29/2010 | Fornaci, Phil | Attorney | Attend meeting with team to discuss status of factual investigation and preparation | 3.50 | \$ 211.50 | \$ 740.25 | \$ 505.00 | \$ 1,767.50 |
| 3/29/2010 | Golden, D | Attorney | Attend meeting with team to discuss status of factual investigation and preparation | 3.50 | \$ 211.50 | \$ 740.25 | \$ 450.00 | \$ 1,575.00 |
| 4/3/2010 | Golden, D | Attorney | Conference call with team to discuss call planning | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 5/3/2010 | Golden, D | Attorney | Review Review new questionnaire to make sure it covers the legal theories we want to hit. | 0.25 | \$ 211.50 | \$ 53.51 | \$ 450.00 | \$ 113.85 |
| 5/17/2010 | Golden, D | Attorney | Email to Respond to Helens email regarding possible grievances for Ms. Scott and suggesting another possible area of grievance. | 0.04 | \$ 211.50 | \$ 8.04 | \$ 450.00 | \$ 17.10 |
| 7/9/2010 | Finkenstadt, Ivy | Attorney | Conference call with Ted and Virginia Justice re exhaustion and status of draft complaint. | 0.67 | \$ 211.50 | \$ 141.07 | \$ 450.00 | \$ 300.15 |
| 7/9/2010 | Golden, D | Attorney | Conference call with Conf call with Ivy, Ted and VAJC people about planning and writing complaint and reviewing issues that still have to be researched / sorted out. | 1.32 | \$ 211.50 | \$ 278.76 | \$ 450.00 | \$ 593.10 |
| 8/10/2010 | Finkenstadt, Ivy | Attorney | Research Research individual and official capacity suits under 1983 for declaratory or injunctive relief. | 0.44 | \$ 211.50 | \$ 93.69 | \$ 450.00 | \$ 199.35 |
| 8/10/2010 | Finkenstadt, Ivy | Attorney | Review Read and comment on draft complaint | 2.19 | \$ 211.50 | \$ 463.61 | \$ 450.00 | \$ 986.40 |
| 11/17/2010 | Golden, D | Attorney | Meet with ted and va folks re updates and case theory | 2.50 | \$ 211.50 | \$ 528.75 | \$ 450.00 | \$ 1,125.00 |
| 11/17/2010 | Golden, D | Attorney | Meet with va folks over lunch to continue discussion | 1.50 | \$ 211.50 | \$ 317.25 | \$ 450.00 | \$ 675.00 |
| 2/14/2011 | Golden, D | Attorney | try to puzzle through grievances and what bobinette fearce has exhausted. | 0.57 | \$ 211.50 | \$ 120.13 | \$ 450.00 | \$ 255.60 |
| 2/17/2011 | Golden, D | Attorney | Research Answer Abigail's email about how exhaustion played out in deaf case. | 0.13 | \$ 211.50 | \$ 27.71 | \$ 450.00 | \$ 58.95 |
| 2/24/2011 | Golden, D | Attorney | Telephone call Talked to Ted re our trip. We're on the same page. | 0.10 | \$ 211.50 | \$ 20.09 | \$ 450.00 | \$ 42.75 |
| 3/9/2011 | Golden, D | Attorney | Travel and meeting with team in Charlottesville to discuss pre-suit investigation, exhaustion of remedies, and related matters | 8.00 | \$ 211.50 | \$ 1,692.00 | \$ 450.00 | \$ 3,600.00 |
| 4/6/2011 | Golden, D | Attorney | Analyze Review grievances for exhaustion | 0.10 | \$ 211.50 | \$ 20.30 | \$ 450.00 | \$ 43.20 |
| 4/7/2011 | Golden, D | Attorney | Analyze Review grievances for exhaustion | 1.12 | \$ 211.50 | \$ 237.73 | \$ 450.00 | \$ 505.80 |
| 4/8/2011 | Golden, D | Attorney | Review Reviewing grievance records sent over from Ted. | 14.38 | \$ 211.50 | \$ 3,041.16 | \$ 450.00 | \$ 6,470.55 |
| 9/2/2011 | Golden, D | Attorney | TC with T. Howard re revising draft complaint | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 10/20/2011 | Golden, D | Attorney | TC with T. Howard re status of revised draft Complaint | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 11/4/2011 | Golden, D | Attorney | Review Review last draft of complaint and consider what change of provider means. | 0.06 | \$ 211.50 | \$ 13.54 | \$ 450.00 | \$ 28.80 |
| 11/10/2011 | Golden, D | Attorney | TC with T. Howard re status of revised draft Complaint | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 11/21/2011 | Golden, D | Attorney | Conference call with Conference call with Fluvanna team to deal with updates. | 1.25 | \$ 211.50 | \$ 265.22 | \$ 450.00 | \$ 564.30 |
| 12/9/2011 | Finkenstadt, Ivy | Attorney | Conference call with Fluvanna team regarding complaint, status of case, and plans for filing | 0.95 | \$ 211.50 | \$ 200.93 | \$ 450.00 | \$ 427.50 |
| 12/20/2011 | Golden, D | Attorney | Conference call with Conference call to discuss complaint | 1.00 | \$ 211.50 | \$ 211.71 | \$ 450.00 | \$ 450.45 |
| 1/17/2012 | Golden, D | Attorney | Edit review and edit draft of complaint | 0.83 | \$ 211.50 | \$ 175.76 | \$ 450.00 | \$ 373.95 |
| 1/20/2012 | Fornaci, Phil | Attorney | Conference call with co-counsel regarding draft complaint | 0.75 | \$ 211.50 | \$ 158.63 | \$ 505.00 | \$ 378.75 |
| 4/25/2012 | Finkenstadt, Ivy | Attorney | Email to Abigail regarding policy on medical assessments being secure and not able to be disclosed to prisoners. | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 5/9/2012 | Finkenstadt, Ivy | Attorney | Revise draft demand letter and sent follow up email and comments to Fluvanna work team | 0.80 | \$ 211.50 | \$ 169.20 | \$ 450.00 | \$ 360.00 |
| 5/15/2012 | Finkenstadt, Ivy | Attorney | Review REview agenda for meeting, ltrs from clients, and latest draft of the complaint. | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 5/16/2012 | Finkenstadt, Ivy | Attorney | Meet with Fluvanna team to review the latest complaint, discuss demand letter, discuss status of medical records, strategy for going forward. | 2.50 | \$ 211.50 | \$ 528.75 | \$ 450.00 | \$ 1,125.00 |
| 5/16/2012 | Fornaci, Phil | Attorney | Meet with co-counsel regarding complaint drafting, visits with clients, medical documents, updates on status. | 2.33 | \$ 211.50 | \$ 493.43 | \$ 505.00 | \$ 1,178.17 |
| 5/16/2012 | Golden, D | Attorney | Meet with Fluvanna team to review the latest complaint, discuss demand letter, discuss status of medical records, strategy for going forward. | 2.50 | \$ 211.50 | \$ 528.75 | \$ 450.00 | \$ 1,125.00 |
| 5/29/2012 | Finkenstadt, Ivy | Attorney | Review updated retainer, attorney's fee agreement addendum, and demand letter for Fluvanna case | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 6/22/2012 | Golden, D | Attorney | Email to team re scheduling | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 6/25/2012 | Finkenstadt, Ivy | Attorney | Prepare for Visit prep- get fax sheets ready for legal visits. | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 6/28/2012 | Finkenstadt, Ivy | Attorney | Travel to Charlottesville for Fluvanna client visits | 3.00 | \$ 211.50 | \$ 634.50 | \$ 450.00 | \$ 1,350.00 |
| 6/28/2012 | Finkenstadt, Ivy | Attorney | Meet with clients: Rebecca Scott, Cynthia Scott, Bobinette Fearce, Patricia Knight, Marguerite Richardson re complaint facts and updates. Planned litigation | 5.00 | \$ 211.50 | \$ 1,057.50 | \$ 450.00 | \$ 2,250.00 |
| 6/29/2012 | Finkenstadt, Ivy | Attorney | Meet with litigation team regarding plan for filing and strategies | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 6/29/2012 | Finkenstadt, Ivy | Attorney | Travel back from Fluvanna legal visits | 3.00 | \$ 211.50 | \$ 634.50 | \$ 450.00 | \$ 1,350.00 |
| 7/3/2012 | Finkenstadt, Ivy | Attorney | Edit demand letter to Fluvanna defendants | 0.33 | \$ 211.50 | \$ 70.43 | \$ 450.00 | \$ 149.85 |

Time Report with Fee Totals

| | | | | | | | | |
|------------|------------------|----------|--|-------|-----------|-------------|-----------|-------------|
| 7/11/2012 | Finkenstadt, Ivy | Attorney | Review Review FCCW complaint | 0.95 | \$ 211.50 | \$ 201.14 | \$ 450.00 | \$ 427.95 |
| 7/11/2012 | Finkenstadt, Ivy | Attorney | Review Review Demand Letter to DOC | 0.51 | \$ 211.50 | \$ 107.23 | \$ 450.00 | \$ 228.15 |
| 7/16/2012 | Finkenstadt, Ivy | Attorney | Review review of Abigail's edits to complaint | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 7/23/2012 | Golden, D | Attorney | plant trip to c'ville for press conference | 0.80 | \$ 211.50 | \$ 169.20 | \$ 450.00 | \$ 360.00 |
| 7/23/2012 | Golden, D | Attorney | read final fluvanna complaint | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 7/23/2012 | Golden, D | Attorney | read final fluvanna complaint | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 7/23/2012 | Golden, D | Attorney | plant trip to c'ville for press conference | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| 7/23/2012 | Golden, D | Attorney | plant trip to c'ville for press conference | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 7/23/2012 | Golden, D | Attorney | read final fluvanna complaint | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 7/23/2012 | Golden, D | Attorney | press call | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 7/24/2012 | Golden, D | Attorney | driving to and from c'ville | 6.00 | \$ 211.50 | \$ 1,269.00 | \$ 450.00 | \$ 2,700.00 |
| 7/24/2012 | Golden, D | Attorney | press conference | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 7/26/2012 | Golden, D | Attorney | email to abigail | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 8/24/2012 | Golden, D | Attorney | fccw pro hacs and read motion | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 8/27/2012 | Finkenstadt, Ivy | Attorney | Review motion to dismiss by individual VDOC defendants. in preparation of conference call. | 0.12 | \$ 211.50 | \$ 26.23 | \$ 450.00 | \$ 55.80 |
| 8/27/2012 | Finkenstadt, Ivy | Attorney | Conference call with Fluvanna team about responding to Motion to Dismiss from DOC defendants | 0.80 | \$ 211.50 | \$ 169.20 | \$ 450.00 | \$ 360.00 |
| 10/1/2012 | Golden, D | Attorney | fluvanna emails | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 4/30/2013 | Golden, D | Attorney | review emails and prep for today's call | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 4/30/2013 | Golden, D | Attorney | Scott conference call | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 9/6/2013 | Golden, D | Attorney | Conference Call for Discovery Planning | 2.80 | \$ 211.50 | \$ 592.20 | \$ 450.00 | \$ 1,260.00 |
| 9/23/2013 | Golden, D | Attorney | Email re piedmont settlement | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 11/25/2013 | Golden, D | Attorney | read order compelling discovery | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 11/27/2013 | Golden, D | Attorney | Research PLRA application to fees imposed as a result of a bad faith motion | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| 12/13/2013 | Golden, D | Attorney | Review draft of fees motion | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| 12/13/2013 | Golden, D | Attorney | Review draft of fees motion | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 2/4/2014 | Golden, D | Attorney | list of settlement issues for fluvanna | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 2/4/2014 | Golden, D | Attorney | conference call with team re settlement issues for fluvanna | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 2/19/2014 | Golden, D | Attorney | TC with Ted Howard | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 3/13/2014 | Golden, D | Attorney | TC re deposition prep with E. Trodden & B. Casteneda | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| 6/2/2014 | Golden, D | Attorney | Read Angelone report | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 7/17/2014 | Mincberg, E | Attorney | Phone conf. w. cocounsel re class cert. and other issues | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 7/24/2014 | Mincberg, E | Attorney | Rev. and edits to class cert. motion papers and email re same | 1.50 | \$ 211.50 | \$ 317.25 | \$ 505.00 | \$ 757.50 |
| 7/31/2014 | Mincberg, E | Attorney | Discs w T Howard and LAJC cocounsel re class cert, discovery, and other issues | 7.50 | \$ 211.50 | \$ 1,586.25 | \$ 505.00 | \$ 3,787.50 |
| 8/8/2014 | Golden, D | Attorney | Read FCCW class brief | 1.50 | \$ 211.50 | \$ 317.25 | \$ 450.00 | \$ 675.00 |
| 8/12/2014 | Golden, D | Attorney | Review affidavit for class motion | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 8/14/2014 | Mincberg, E | Attorney | Conf call w cocounsel re case and rev. of claa cert. and sum. Judgment papers | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 8/28/2014 | Mincberg, E | Attorney | Conf call w cocounsel re case, incl. status of motions and poss. Jury consultant | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 9/5/2014 | Mincberg, E | Attorney | Discs w. T.Howard and LAJC cocounsel re case, incl motions, discovery, and trial prep | 7.50 | \$ 211.50 | \$ 1,586.25 | \$ 505.00 | \$ 3,787.50 |
| 9/11/2014 | Mincberg, E | Attorney | Call w. pot. Jury consultant, rev. of material re same, and conf call re same and other issues | 2.00 | \$ 211.50 | \$ 423.00 | \$ 505.00 | \$ 1,010.00 |
| 9/18/2014 | Mincberg, E | Attorney | Prep for and conf call w cocounsel re trial prep and related issues | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 10/1/2014 | Benjamin Schwid | Intern | Researched cases relating to whether or not the defendant is entitled to a jury trial on the issue of liability | 0.87 | \$ 145.00 | \$ 125.57 | \$ 145.00 | \$ 125.57 |
| 10/2/2014 | Mincberg, E | Attorney | Rev. of draft motion papers and conf call w cocounsel re same and other issues | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 10/10/2014 | Mincberg, E | Attorney | Discs w. T. Howard and LAJC cocounsel re pretrial, trial prep, and related issues | 7.50 | \$ 211.50 | \$ 1,586.25 | \$ 505.00 | \$ 3,787.50 |
| 10/14/2014 | Mincberg, E | Attorney | Rev. of draft material from and for jury consultant and call w. him & cocounsel re same | 1.50 | \$ 211.50 | \$ 317.25 | \$ 505.00 | \$ 757.50 |
| 10/16/2014 | Golden, D | Attorney | Conference call re FCCW issue | 0.60 | \$ 211.50 | \$ 126.90 | \$ 450.00 | \$ 270.00 |
| 10/16/2014 | Mincberg, E | Attorney | Conf call w cocounsel re pretrial and trial prep issues | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 10/23/2014 | Golden, D | Attorney | Team call | 0.80 | \$ 211.50 | \$ 169.20 | \$ 450.00 | \$ 360.00 |
| 10/31/2014 | Mincberg, E | Attorney | Discs w T>Howard and LAJC cocounsel re pretrial and trial prep, incl witness sel. | 7.50 | \$ 211.50 | \$ 1,586.25 | \$ 505.00 | \$ 3,787.50 |
| 11/1/2014 | Mincberg, E | Attorney | Rev. of email fr def. counsel re sett. and email to cocounsel re same | 0.75 | \$ 211.50 | \$ 158.63 | \$ 505.00 | \$ 378.75 |
| 11/6/2014 | Mincberg, E | Attorney | Conf call w cocounsel re sett. issues | 0.50 | \$ 211.50 | \$ 105.75 | \$ 505.00 | \$ 252.50 |
| 11/12/2014 | Mincberg, E | Attorney | Rev. draft witness summaries, exh. Lists, and in limine motion topics | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 11/13/2014 | Mincberg, E | Attorney | Discs w. T.Howard and cocounsel re above and other pretrial prep | 7.50 | \$ 211.50 | \$ 1,586.25 | \$ 505.00 | \$ 3,787.50 |
| 11/17/2014 | Mincberg, E | Attorney | Rev. emails & drafts re in limine and other pretrial motions and email comments re same to cocounsel | 0.75 | \$ 211.50 | \$ 158.63 | \$ 505.00 | \$ 378.75 |
| 11/20/2014 | Mincberg, E | Attorney | Re. drafts re pretrial motions, exhibits and testimony amd email comments re same to cocounsel | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 11/23/2014 | Mincberg, E | Attorney | Conf call w cocounsel re 11/20 review, and trial and sett. status | 1.00 | \$ 211.50 | \$ 211.50 | \$ 505.00 | \$ 505.00 |
| 12/8/2014 | Golden, D | Attorney | Travel to FCCW for meetings with clients, Dr. Griefinger, and co-counsel | 13.80 | \$ 211.50 | \$ 2,918.70 | \$ 450.00 | \$ 6,210.00 |
| 2/2/2015 | Golden, D | Attorney | Conference Call with Dr. G re his work | 0.90 | \$ 211.50 | \$ 190.35 | \$ 450.00 | \$ 405.00 |
| 6/15/2015 | Golden, D | Attorney | travel and settlement conference in charlottesville RE final settlement fccw call - both medical teams and legal teams to hammer our final | 11.40 | \$ 211.50 | \$ 2,411.10 | \$ 450.00 | \$ 5,130.00 |
| 6/18/2015 | Golden, D | Attorney | disagreements with OPs | 1.20 | \$ 211.50 | \$ 253.80 | \$ 450.00 | \$ 540.00 |
| 6/29/2015 | Golden, D | Attorney | Reviewing emails re potential new named class reps and analyzing responses and drafting email | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 7/15/2015 | Golden, D | Attorney | conference call re settlement finalization and adding plaintiffs | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 8/13/2015 | Golden, D | Attorney | Conf. Call with team to discuss outstanding issues in settlement | 1.40 | \$ 211.50 | \$ 296.10 | \$ 450.00 | \$ 630.00 |
| 9/9/2015 | Golden, D | Attorney | Conference call w/ team to tie up ends for settlement | 1.20 | \$ 211.50 | \$ 253.80 | \$ 450.00 | \$ 540.00 |
| 9/10/2015 | Golden, D | Attorney | Worked on class notice for pagination | 1.10 | \$ 211.50 | \$ 232.65 | \$ 450.00 | \$ 495.00 |
| 9/11/2015 | Golden, D | Attorney | TC to E. Trodden re fees calculation question | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 9/11/2015 | Golden, D | Attorney | Prepare hours for Fluvanna | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |

Time Report with Fee Totals

| | | | | | | | | |
|------------|-----------|----------|--|------|-----------|---------------------|-----------|----------------------|
| 10/13/2015 | Golden, D | Attorney | Research on fees in similar cases | 1.00 | \$ 211.50 | \$ 211.50 | \$ 450.00 | \$ 450.00 |
| 10/13/2015 | Golden, D | Attorney | Edited draft declaration for David Fathi | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 10/13/2015 | Golden, D | Attorney | Research on fees in similar cases | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/13/2015 | Golden, D | Attorney | Review draft of memo for fee award | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/13/2015 | Golden, D | Attorney | Review draft of memo for fee award | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| 10/13/2015 | Golden, D | Attorney | Draft answer to email from B. Spencer re his affidavit | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 10/14/2015 | Golden, D | Attorney | Conference call re fees motion / strategy | 2.40 | \$ 211.50 | \$ 507.60 | \$ 450.00 | \$ 1,080.00 |
| 10/15/2015 | Golden, D | Attorney | Edited draft declaration for David Fathi | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 10/15/2015 | Golden, D | Attorney | Edited draft declaration for David Fathi | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/15/2015 | Golden, D | Attorney | Find password for N. Sandora to access PLN database for necessary research into fee awards | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/15/2015 | Golden, D | Attorney | Pull together hours in XLS compatible format for S. Metzler to analyze for motion | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 10/15/2015 | Golden, D | Attorney | Find password for N. Sandora to access PLN database for necessary research into fee awards | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/15/2015 | Golden, D | Attorney | List key dates in litigation for S. Metzler analysis. | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 10/15/2015 | Golden, D | Attorney | List key dates in litigation for S. Metzler analysis. | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/15/2015 | Golden, D | Attorney | List key dates in litigation for S. Metzler analysis. | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 10/15/2015 | Golden, D | Attorney | Review WLC hourly billing statement | 0.50 | \$ 211.50 | \$ 105.75 | \$ 450.00 | \$ 225.00 |
| 10/15/2015 | Golden, D | Attorney | Review WLC hourly billing statement | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| 10/16/2015 | Golden, D | Attorney | Look at fee amounts and strategize | 0.20 | \$ 211.50 | \$ 42.30 | \$ 450.00 | \$ 90.00 |
| 10/16/2015 | Golden, D | Attorney | Look at fee amounts and strategize - draft email to co-counsel | 0.10 | \$ 211.50 | \$ 21.15 | \$ 450.00 | \$ 45.00 |
| 10/17/2015 | Golden, D | Attorney | Review memo in support of fees motion and provide feedback | 1.20 | \$ 211.50 | \$ 253.80 | \$ 450.00 | \$ 540.00 |
| 10/17/2015 | Golden, D | Attorney | Draft declaration for fee petition. | 1.30 | \$ 211.50 | \$ 274.95 | \$ 450.00 | \$ 585.00 |
| 10/17/2015 | Golden, D | Attorney | Draft declaration for fee petition. | 0.90 | \$ 211.50 | \$ 190.35 | \$ 450.00 | \$ 405.00 |
| 10/17/2015 | Golden, D | Attorney | Review memo in support of fees motion and provide feedback | 0.30 | \$ 211.50 | \$ 63.45 | \$ 450.00 | \$ 135.00 |
| 10/18/2015 | Golden, D | Attorney | Edited draft declaration for David Fathi | 0.40 | \$ 211.50 | \$ 84.60 | \$ 450.00 | \$ 180.00 |
| | | | | | | | | |
| | | | | | | | | |
| | | | TOTAL | | | \$ 45,674.42 | | \$ 100,507.59 |

| Timekeeper | Total Hours | Per Hour Rate | Total | Market | |
|----------------|-------------|---------------|--------------|-----------|--------------|
| | | | | Rate | Market Total |
| Golden, D | 125.31 | \$ 211.50 | \$ 26,503.28 | \$ 450.00 | \$ 56,389.95 |
| Finkenstadt, I | 26.97 | \$ 211.50 | \$ 5,703.52 | \$ 450.00 | \$ 12,135.15 |
| Fornaci, P | 9.58 | \$ 211.50 | \$ 2,026.80 | \$ 505.00 | \$ 4,839.42 |
| Mincberg, E | 53.50 | \$ 211.50 | \$ 11,315.25 | \$ 505.00 | \$ 27,017.50 |
| Schwid, B | 0.87 | \$ 145.00 | \$ 125.57 | \$ 145.00 | \$ 125.57 |