

SPECIAL MASTER'S EXHIBIT A

**HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER**

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**GOVERNOR'S OFFICE OF GENERAL
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**PENNSYLVANIA DEPARTMENT OF
STATE**

Kathleen M. Kotula (I.D. No. 86321)
306 North Office Bldg., 401 North Street
Harrisburg, PA 17120-0500
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Harrisburg, PA 17120
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

County of Fulton, <i>et al.</i> ,	:	
	:	
Petitioners/Appellees	:	
	:	No. 277 MD 2021
v.	:	
	:	No. 3 MAP 2022
Secretary of the Commonwealth,	:	
	:	
Respondent/Appellant	:	

AFFIDAVIT OF ROBERT A. WIYGUL

I, Robert A. Wiygul, hereby state and affirm the following:

1. I am a shareholder in the law firm of Hangley Aronchick Segal Pudlin & Schiller (the "Firm") and an attorney licensed to practice in Pennsylvania. The

Firm represents Respondent/Appellant the Acting Secretary of the Commonwealth (the “Secretary”) in the above-captioned action.

2. I submit this Affidavit in support of the Secretary’s Application for an Award of Fees and Costs Pursuant to the Special Master’s Order Dated April 28, 2023 (the “Application”). The facts set forth herein are based on my personal knowledge and the Firm’s billing records.

3. The Firm’s billing records attached as Exhibit A hereto were made at or near the time of the events they record by, or from information transmitted from, persons with knowledge of the events; were kept in the course of the Firm’s regularly conducted activity; and were made as part of the Firm’s regular practice.

4. I have actively practiced law in Pennsylvania since 2011. I received a J.D. from Yale Law School in 2008. I also hold an M.Phil. degree from the University of Cambridge and a B.A. from Williams College. Following law school, I worked for two years as a law clerk for the Honorable Anthony J. Scirica, then-Chief Judge of the United States Court of Appeals for the Third Circuit.

5. I have represented the Secretary in the above-captioned action since its inception, and I have been the Secretary’s lead counsel in the above-captioned action since January 1, 2022. Before January 1, 2022, my former colleague Michele Hangley served as the Secretary’s lead counsel.

6. In the period since January 1, 2022, I was also the Secretary's and Department of State's lead counsel in litigation entitled *McLinko v. Department of State*, Nos. 14, 15, 17, 18, and 19 MAP 2022 (Pa. Sup. Ct.), in which the Secretary and Department of State defended the constitutionality of the General Assembly's authorization of no-excuse mail-in voting. I presented oral argument to the Pennsylvania Supreme Court in that litigation. I also served as lead counsel for the Secretary and Governor Wolf in congressional redistricting litigation entitled *Carter v. Chapman*, No. 7 MM 2022 (Pa. Sup. Ct.), where I presented oral argument to the Pennsylvania Supreme Court. In addition, I have served as lead counsel for the Secretary in defending against litigation seeking to invalidate Act 77 of 2019 entitled *Bonner v. Chapman*, No. 364 MD 2022 (Pa. Commw. Ct.). I presented oral argument to the *en banc* Commonwealth Court in that action. I also represented the Secretary in litigation entitled *Republican National Committee v. Chapman*, No. 447 MD 2022 (Pa. Commw. Ct.), which concerned whether county boards of elections are permitted to provide electors with notice of defects in absentee and mail-in ballot submissions and the opportunity to submit a timely, fully compliant ballot, as well as litigation entitled *Ball v. Acting Secretary of the Commonwealth*, No. 102 MM 2022 (Pa. Sup. Ct.), which concerned whether county boards may refuse to count an absentee or mail-in ballot on the basis that the voter neglected to handwrite a date on the outer envelope enclosing the ballot.

7. I have extensive experience litigating election cases—including cases that, like the above-captioned lawsuit, concern the certification of electronic voting machines—on behalf of the Secretary specifically and Pennsylvania public elections officials generally. This experience includes litigation at every level of the state and federal courts, from the trial courts to the Pennsylvania and United States Supreme Courts. For example, in addition to the cases described in the previous paragraph, I have represented the Secretary in the following matters:

Bognet v. Secretary Commonwealth of Pennsylvania, 980 F.3d 336 (3d Cir. 2020), *vacated on mootness grounds*, 141 S. Ct. 2508 (2021); *Stein v. Boockvar*, No. 16-6287, 2020 WL 2063470 (E.D. Pa. Apr. 29, 2020) (challenge to Secretary’s certification of electronic voting machine); *Crossey v. Boockvar*, No. 266 MD 2020 (Pa. Commw. Ct.); *NAACP Pa. State Conference v. Boockvar*, No. 364 MD 2020 (Pa. Commw. Ct.); *Cramer v. Boockvar*, No. 493 MD 2020 (Pa. Commw. Ct.); *Kelly v. Commonwealth*, 240 A.3d 1255 (Pa. 2020); *Metcalf v. Wolf*, No. 636 M.D. 2020 (Pa. Commw. Ct.); *National Election Defense Coalition v. Boockvar*, No. 674 M.D. 2019 (Pa. Commw. Ct.) (challenge to Secretary’s certification of electronic voting machine). By way of example, I have also represented one or more Pennsylvania county boards of elections in the following matters: *Donald J. Trump for President, Inc. v. Boockvar*, 493 F. Supp. 3d 331 (W.D. Pa. 2020); *Donald J. Trump for President, Inc. v. Boockvar*, 502 F. Supp. 3d 899 (M.D. Pa.

Nov. 21, 2020), *aff'd*, 830 F. App'x 377 (3d Cir. Nov. 27, 2020); *Pa. Democratic Party v. Boockvar*, 238 A.3d 345 (Pa. 2020); *In re Nov. 3, 2020 Gen. Election*, 240 A.3d 591 (Pa. 2020); *In re Canvassing Observation*, 241 A.3d 330 (Pa. 2020); *In re Canvass of Absentee and Mail-in Ballots of Nov. 3, 2020 Gen. Election*, 241 A.3d 1058 (Pa. Nov. 23, 2020).

8. Below is a chart of the attorneys and paralegals who presently work or formerly worked at the Firm and billed time for which the Secretary seeks reimbursement. The chart shows the hourly rate the attorney or paralegal has charged the Secretary pursuant to the Firm's legal-services contract with the Commonwealth:

Name	Position at the Firm	Hourly Rate Charged to the Secretary and for Which Reimbursement is Sought
Robert Wiygul	Shareholder	\$440 ¹
Mark Aronchick	Shareholder	\$440
Michele Hangley	Shareholder	\$440
Eitan Kagedan	Associate	\$300
John Hill	Associate	\$250

¹ I assumed the role of lead counsel for the Secretary in this matter (and other election-related matters) as of January 1, 2022. Before that date, my hourly rate charged to the Commonwealth was \$315, as reflected in the attached billing records. To the extent the Secretary seeks reimbursement for time expended by me in December 2021, he seeks reimbursement at the \$315/hour rate.

Gianni Mascioli	Associate	\$250
Maria Hunter	Paralegal	\$150
Alexandra Arteaga	Paralegal	\$150
Kimberly Ferrari	Paralegal	\$150

9. The specific work performed by the Firm for which the Secretary seeks reimbursement is itemized in **Exhibit A** hereto, which comprises true and correct copies of Firm billing records. (We have redacted time entries related to fees for which the Secretary is not seeking reimbursement under the Special Master's Order dated April 28, 2023.)

10. Attached as Exhibit B hereto is a demonstrative exhibit listing, by date, each of the expenditures of legal-professional time for which the Secretary seeks reimbursement, whether those legal professional are Firm employees, employees of the TLG Firm, or employees of the Commonwealth. Where not based on Firm billing records, the information in this Exhibit is taken from information in the accompanying affidavits from the legal professionals employed by the TLG Firm or the Commonwealth.

11. Attached as Exhibit C hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B during the period up to and including April 12, 2022.

12. Attached as Exhibit D hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B during the period after April 12, 2022.

13. Attached as Exhibit E hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B covering the Commonwealth Court proceedings in December 2021 and January 2022 related to the Secretary's applications to prevent a third-party inspection of Fulton County's Dominion voting equipment.

14. Attached as Exhibit F hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B related to the inspection of Fulton County's Dominion voting equipment scheduled for January 14, 2022, and the Secretary's emergency appeal to the Pennsylvania Supreme Court and application for an injunction pending appeal.

15. Attached as Exhibit G hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B related to other briefing, including merits briefing, and preparation for oral argument in the Secretary's Supreme Court appeal.

16. Attached as Exhibit H hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B related to the sanctions proceedings.

17. Attached as Exhibit I hereto is an itemization and description of the litigation costs the Secretary has paid and seeks to recover, together with documentation of those costs.

18. The Firm work identified in this Affidavit was actually and necessarily performed by the Firm in connection with the pursuit of a protective order and subsequent sanctions proceedings in the above-captioned action. The fees and costs identified in this Affidavit were actually and necessarily incurred by the Secretary in connection with the pursuit of a protective order and subsequent sanctions proceedings in the above-captioned action.

19. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: May 30, 2023


ROBERT A. WIYGUL

EXHIBIT A

January 21, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40113012

Statement of services rendered and costs incurred through December 31, 2021:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/16/21	Eitan Kagedan	Fulton: Research to support basis for motion for entry of preservation order.	1.00	300.00
12/16/21	Robert Wiygul	Draft and revise emergency application for preservation order prohibiting December 22 "examination" of voting equipment by Envoy Sage and communications with team, clients, and OAG regarding same.	9.10	2,866.50

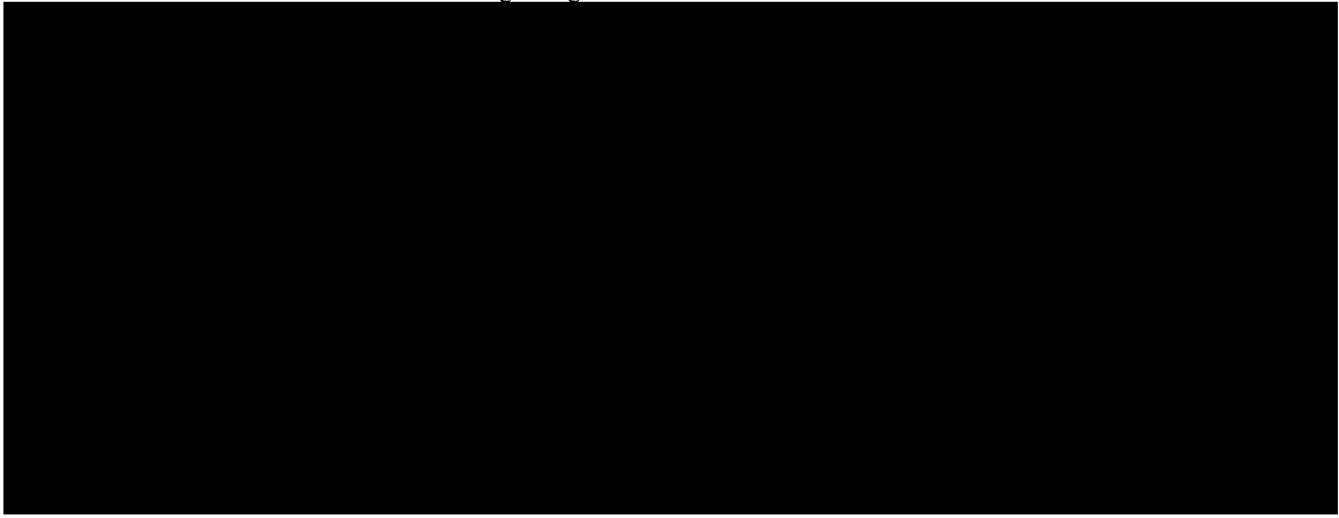
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/17/21	Eitan Kagedan	Fulton County: Review, revise, and hone strategy regarding Emergency Motion to Preserve Evidence and related communications and prepare same for filing.	4.00	1,200.00
12/17/21	Eitan Kagedan	Fulton County: Draft and revise Macias Affidavit in support of Emergency Motion regarding Spoliation.	2.20	660.00
12/17/21	Kim Ferrari	Review and cite check emergency application for Order re spoliation of evidence; review and analyze key communications and organize exhibits for same; draft potential declaration of M. Hangley; review emails with King; file with Commonwealth court.	6.00	900.00
12/17/21	Michele D. Hangley	Edits, discussion, finalizing and filing spoliation motion.	3.00	1,320.00
12/17/21	Robert Wiygul	Revise and finalize emergency application to enjoin Envoy Sage inspection and supporting documents and communicate with team, clients, OAG, and R. Macias regarding same.	5.70	1,795.50
12/18/21	Eitan Kagedan	Fulton County: Review and respond to correspondence regarding Envoy Sage "inspection."	0.60	180.00
12/18/21	Michele D. Hangley	Review, consider and circulate to team King's comments to press on spoliation motion.	0.50	220.00
12/18/21	Robert Wiygul	Conference with K. Stimson regarding recent developments relating to scheduled inspection of Fulton County's voting equipment.	0.30	94.50
12/18/21	Robert Wiygul	Communications with team, clients, Dominion's counsel about scheduling order relating to emergency application to enjoin inspection; communications with team, clients, Dominion's counsel, and R. Macias regarding press-reported interview of T. King regarding purpose of inspection.	1.20	378.00
12/20/21	Eitan Kagedan	Fulton County: Review and analyze Opposition to Application for Emergency Relief.	0.50	150.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/20/21	Eitan Kagedan	Fulton County: Research whether an order denying Emergency Motion Regarding Spoliation is subject to immediate appeal.	3.20	960.00
12/20/21	Eitan Kagedan	Fulton County: Review draft application for leave to submit AP article.	0.30	90.00
12/20/21	Eitan Kagedan	Fulton County: Meet with Ryan Macias to discuss planned Envoy Sage "inspection" and follow up with Michele Hangley and Rob Wiygul.	2.10	0.00
12/20/21	Michele D. Hangley	Spoliation motion: review response, prepare for argument, discuss strategy.	2.50	1,100.00
12/20/21	Robert Wiygul	Prepare for and conduct call with R. Macias regarding Fulton County emergency application and oral argument (including preparatory call with M. Hangley).	1.00	315.00
12/20/21	Robert Wiygul	Review and analyze Petitioners' answer to emergency application and communicate with team and clients regarding same; review memorandum by E. Kagedan regarding potential appealability of order denying emergency application; draft application for leave to submit additional exhibit in support of emergency application.	4.90	1,543.50
12/20/21	Robert Wiygul	Conference with R. Macias regarding Lahr affidavit in support of Petitioners' answer to Emergency Application and conferences with M. Hangley and E. Kagedan regarding strategy for oral argument.	1.20	378.00
12/21/21	Eitan Kagedan	Fulton County: Review argument outline.	0.70	0.00
12/21/21	Eitan Kagedan	Fulton County: Appear for and follow up regarding oral argument on the Secretary's Emergency Application.	1.80	0.00
12/21/21	Michele D. Hangley	Prepared for, mooted, attended Fulton argument; discussed follow up.	3.00	1,320.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/21/21	Robert Wiygul	Fulton: Prepare for and participate in telephone argument on emergency application; follow-up conferences with client and team regarding same.	3.70	1,165.50
12/21/21	Robert Wiygul	Fulton: Draft and revise outline for oral argument on emergency application to enjoin inspection.	3.50	1,102.50
12/21/21	Robert Wiygul	Fulton: Conference with clients and OAG to prepare for oral argument on emergency application to enjoin inspection.	0.90	283.50
12/22/21	Michele D. Hangley	Strategy and discussions with Dominion and Macias re protocol.	1.50	660.00
12/23/21	Michele D. Hangley	Received, reviewed Macias draft report re inspection.	0.50	220.00
12/23/21	Robert Wiygul	Telephone conference with K. Stimson (Dominion) regarding impending inspection of Fulton County voting equipment and Dominion's potential involvement; follow up conference with M. Hangley regarding strategy for negotiating inspection protocol.	0.80	252.00
12/24/21	Michele D. Hangley	Discussed national press reports with Macias.	0.40	176.00
12/27/21	Michele D. Hangley	Drafted protocol for Fulton inspection.	3.00	1,320.00
12/28/21	Eitan Kagedan	Fulton County: Call with Ryan Macias, Aimee Thomson, Michele Hangley, and Rob Wiygul concerning negotiation of protocol for Envoy Sage Inspection.	0.90	0.00
12/28/21	Eitan Kagedan	Review and consider impact of correspondence regarding conversation with Dominion's outside counsel.	0.20	60.00
12/28/21	Michele D. Hangley	Drafted protocol; discussed strategy for Fulton protective order.	2.00	880.00
12/28/21	Robert Wiygul	Conference with R. Macias regarding terms of proposed protocol governing inspection of Fulton voting machines and preparation and follow-up conferences with M. Hangley regarding same.	1.50	472.50

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/28/21	Robert Wiygul	Fulton: Telephone calls and emails with outside counsel for Dominion regarding their potential intervention and follow up communications with M. Hangley and clients regarding same.	1.10	346.50
12/29/21	Eitan Kagedan	Fulton County: Review and comment on draft Inspection Protocol.	0.80	240.00
12/29/21	Eitan Kagedan	Develop approach for and begin drafting Protective Order.	1.40	420.00
12/29/21	Michele D. Hangley	Drafted protocol for Fulton January 10 inspection.	2.70	1,188.00
12/29/21	Michele D. Hangley	Located and advised on applicability of models for Protective Order.	0.50	220.00
12/29/21	Michele D. Hangley	Located and advised on applicability of models for Dominion intervention in Fulton County case.	0.50	220.00
12/29/21	Robert Wiygul	Review and comment on draft inspection protocol and email R. Macias and A. Thomson regarding same.	1.00	315.00
12/30/21	Eitan Kagedan	Draft Protective Order and review and comment on draft Protocol regarding Envoy Sage inspection.	3.20	960.00
12/30/21	Michele D. Hangley	Fulton: Protocol and protective order drafting.	1.50	660.00
12/30/21	Robert Wiygul	Review and comment on draft Fulton inspection protocol and protective order and communications with team and clients regarding same; communications with Dominion's counsel regarding Dominion's possible intervention.	3.60	1,134.00
12/31/21	Eitan Kagedan	Review revisions to draft Fulton protective order in advance of Envoy Sage inspection.	0.50	150.00
12/31/21	Michele D. Hangley	Discussed potential intervention in Fulton County case with Dominion; sent protocol to King.	2.00	880.00
12/31/21	Robert Wiygul	Communications with counsel for Dominion regarding their potential intervention in Fulton County case.	1.00	315.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/31/21	Robert Wiygul	Review and analyze R. Macias's comments on draft protective order and email clients regarding same; revise protective order and emails with R. Macias regarding same.	0.90	283.50



February 25, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40113808

Statement of services rendered and costs incurred through January 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/01/22	Robert Wiygul	Fulton County: Email to clients regarding call with Dominion's counsel regarding possible intervention motion.	0.30	132.00
01/03/22	Eitan Kagedan	Fulton County: Review and respond to correspondence regarding Dominion Motion to Intervene and plan next steps.	0.90	270.00
01/03/22	Robert Wiygul	Fulton County: Telephone conference with K. Kotula regarding Buchanan's representation of Dominion and conference with E. Kagedan regarding immediate- and medium-term task lists (negotiation of protocol with Fulton County, drafting of potential motion for relief regarding inspection, etc.).	0.60	264.00
01/03/22	Robert Wiygul	Fulton County: Review and analyze Dominion's motion to intervene and attachments and email clients and Dominion regarding same.	0.90	396.00
01/04/22	Eitan Kagedan	Fulton County: Review, analyze, and plan response to Fulton County's proposed Inspection Protocol.	1.90	570.00
01/04/22	Eitan Kagedan	Fulton County: Draft Motion for Entry of Order regarding Inspection Protocol.	1.40	420.00
01/04/22	Eitan Kagedan	Fulton County: Develop strategy for negotiation of Inspection Protocol and for bringing disputes regarding the same before the court, particularly in light of Dominion's pending Motion to Intervene.	0.60	180.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/04/22	Robert Wiygul	Fulton County: Review proposed inspection protocol and scope of inspection by Petitioners; communications with E. Kagedan, R. Macias, and clients regarding same.	1.40	616.00
01/04/22	Robert Wiygul	Fulton County: Review order scheduling hearing on Dominion's application and communications with clients, team, and R. Macias regarding same.	0.40	176.00
01/04/22	Robert Wiygul	Conference with S. Gallagher regarding evidentiary hearing on Dominion's application to intervene; emails to T. King and clients regarding Fulton County's recall of their proposed protocol.	0.60	264.00
01/05/22	Eitan Kagedan	Fulton County: Review and revise draft stipulations in advance of hearing on Dominion Motion to Intervene, including checking proposed stipulations against factual record.	1.40	420.00
01/05/22	Eitan Kagedan	Fulton County: Draft letter to court regarding status of inspection protocol negotiations.	3.00	900.00
01/05/22	Eitan Kagedan	Fulton County: Research regarding potential interlocutory appeal of adverse order on Dominion motion to intervene.	1.30	390.00
01/05/22	Eitan Kagedan	Fulton County: Develop strategy and game plan for Dominion Motion to Intervene and inspection protocol negotiations.	1.00	300.00
01/05/22	Robert Wiygul	Fulton County: Conference with clients regarding intervention hearing and inspection protocol negotiations and follow up conference with E. Kagedan regarding same.	0.70	308.00
01/05/22	Robert Wiygul	Fulton County: Draft letter to Judge Leavitt seeking postponement of inspection and requirements in inspection protocol.	5.90	2,596.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/06/22	Eitan Kagedan	Fulton County: Draft, review, revise, and respond to comments on letter to court regarding status of inspection protocol negotiations and answer to Dominion Motion to Intervene.	4.00	1,200.00
01/06/22	Eitan Kagedan	Fulton County: Research impact of Sunshine Act on court's ability to enjoin public meeting.	0.50	150.00
01/06/22	Kim Ferrari	Fulton County: Edit answer; edit letter and exhibits; prepare for hearing.	4.00	600.00
01/06/22	Robert Wiygul	Fulton County: Finish drafting letter to Judge Leavitt seeking postponement of inspection and specific protocol terms; revise answer to Dominion's application to intervene.	2.10	924.00
01/06/22	Robert Wiygul	Fulton County: Communications with team, parties, and clients regarding proposed stipulation of facts; communications with clients and team regarding answer to Dominion's application to intervene and letter to Court regarding status of negotiations over inspection protocol.	1.80	792.00
01/07/22	Eitan Kagedan	Fulton County: Conduct final preparations for, attend, and conduct post mortem on hearing on Dominion Motion to Intervene and status conference on negotiation of inspection protocol.	4.80	1,440.00
01/07/22	Kim Ferrari	Coordinate logistics of recording Fulton County Inspection; watch hearing in prep for inspection; work on draft of potential King's Bench petition.	2.00	300.00
01/07/22	Robert Wiygul	Fulton County: Prepare for and attend hearing and status conference and follow up communications with team, client, and OAG regarding same.	4.90	2,156.00
01/07/22	Robert Wiygul	Fulton County: Conference with counsel for Dominion regarding negotiation of protocol.	0.40	176.00
01/07/22	Robert Wiygul	Fulton County: Conference with clients and OAG regarding strategy following hearing.	0.90	396.00
01/07/22	Robert Wiygul	Fulton County: Conference with R. Macias regarding case status and draft inspection protocol.	0.80	352.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/08/22	Eitan Kagedan	Fulton County: Review and comment on draft inspection protocol and client update and strategy email memo.	1.70	510.00
01/08/22	Robert Wiygul	Fulton County: Draft inspection protocol and communications with R. Macias and E. Kagedan regarding same; revise same and email clients regarding inspection protocol and related issues; review emails from other parties regarding negotiations.	8.20	3,608.00
01/09/22	Eitan Kagedan	Fulton County: Conference with all parties regarding negotiation of inspection protocols.	1.30	390.00
01/09/22	Eitan Kagedan	Fulton County: Follow up regarding conference with all parties regarding negotiation of inspection protocols.	0.80	240.00
01/09/22	Eitan Kagedan	Fulton County: Review, revise, and comment on drafts of inspection protocol agreement.	1.70	510.00
01/09/22	Eitan Kagedan	Fulton County: Review, revise, and comment on Emergency Application to Postpone Inspection Based on Expert Availability.	0.50	150.00
01/09/22	Eitan Kagedan	Fulton County: Review and respond to correspondence regarding inspection protocol negotiations.	0.40	120.00
01/09/22	Robert Wiygul	Fulton County: Draft and revise emergency application to reschedule inspection based on expert's unavailability.	1.60	704.00
01/09/22	Robert Wiygul	Fulton County: Prepare for and participate in conference with parties regarding inspection protocols and follow-up conferences with E. Kagedan and OAG regarding same; revise summary of conference and email same to clients.	4.20	1,848.00
01/09/22	Robert Wiygul	Fulton County: Revise proposed inspections protocol and communications with E. Kagedan, R. Macias, and clients regarding same.	2.20	968.00
01/10/22	Eitan Kagedan	Fulton County: Review, comment on, and draft response to Petitioners' proposal.	1.40	420.00
01/10/22	Eitan Kagedan	Fulton County: Research issues related to viability and procedural requirements for permissive interlocutory appeal.	0.40	120.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/10/22	Eitan Kagedan	Fulton County: Review and develop strategy related to correspondence regarding planned inspection.	1.80	540.00
01/10/22	Robert Wiygul	Fulton County: Finalize and file emergency application to reschedule inspection based on expert's unavailability and call Prothonotary's Office regarding same; emails to clients regarding same.	0.50	220.00
01/10/22	Robert Wiygul	Review and analyze revised inspection protocol proposal from Fulton County and communications with R. Macias, E. Kagedan, and clients regarding same.	1.00	440.00
01/10/22	Robert Wiygul	Fulton County: Begin drafting letter to T. King regarding inspection protocol based on E. Kagedan's draft.	2.30	1,012.00
01/11/22	Eitan Kagedan	Fulton County: Draft Joint Status Report regarding status of negotiations and develop strategy regarding same.	1.50	450.00
01/11/22	Eitan Kagedan	Fulton County: Review and revise letter to Tom King regarding inspection protocol negotiations.	3.00	900.00
01/11/22	Kim Ferrari	Fulton County: Coordinate video for inspection; edit letter and pull exhibits to same.	2.00	300.00
01/11/22	Robert Wiygul	Fulton County: Finish drafting letter to T. King regarding inspection protocol and email clients regarding same.	2.50	1,100.00
01/11/22	Robert Wiygul	Conferences with clients, OAG, and SUDC regarding coordinating strategy in Fulton County and IOC subpoena cases.	1.40	616.00
01/11/22	Robert Wiygul	Fulton County: Begin drafting Respondent's portion of joint status report.	2.00	880.00
01/11/22	Robert Wiygul	Fulton County: Revise letter to T. King regarding inspection protocols and communicate with clients, OAG, and R. Macias regarding same.	1.30	572.00
01/12/22	Eitan Kagedan	Fulton County: Draft sections of Renewed Emergency Application to Prohibit Inspection.	2.20	660.00
01/12/22	Eitan Kagedan	Fulton County: Review letter from Tom King regarding inspection protocol negotiations.	0.10	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/12/22	Robert Wiygul	Conferences with clients, SUDC, and OAG regarding IOC subpoena and Fulton County cases.	-1.50 0.70	660.00 308.00*
01/12/22	Robert Wiygul	Fulton County: Develop E. Kagedan's draft of renewed emergency application to prohibit inspection.	0.60	264.00
01/13/22	Eitan Kagedan	Fulton County: Draft Petition for Writ of Mandamus or Extraordinary Jurisdiction in anticipation of Commonwealth Court's not issuing an order prior to inspection.	3.90	1,170.00
01/13/22	Eitan Kagedan	Fulton County: Draft, revise, and negotiate Joint Status Report.	1.10	330.00
01/13/22	Eitan Kagedan	Fulton County: Conduct Meet and Confer with counsel for Fulton County regarding negotiation of inspection protocols.	0.20	60.00
01/13/22	Eitan Kagedan	Fulton County: Review correspondence from Matt Haverstick.	0.10	30.00
01/13/22	Eitan Kagedan	Fulton County: Review and revise Emergency Application.	2.20	660.00
01/13/22	Kim Ferrari	Fulton County: Review status and coordinate details of video for inspection; prepare for inspection and work with R Wiygul; edit renewed emergency application and organize exhibits to same; redact cell phone numbers; cite check same.	4.00	600.00
01/13/22	Robert Wiygul	Fulton County: Finish drafting and revise renewed emergency application for relief regarding inspection and Secretary's portion of joint status report and conference with clients and E. Kagedan regarding same.	6.30	2,772.00
01/13/22	Robert Wiygul	Prepare for potential hearing before Judge Leavitt regarding Secretary's emergency applications for relief and the status of the parties' negotiations (including travel from Philadelphia to Fulton County to attend potential inspection).	4.50	1,980.00
01/14/22	Eitan Kagedan	Fulton County: Draft filings and manage tasks related to emergency application for stay to Pennsylvania Supreme Court, including jurisdictional statement and notice of appeal.	5.90	1,770.00

*Where only a portion of time in a single time entry is compensable under the Supreme Court's April 19, 2023 Order, we have identified the compensable portion in red text.

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/14/22	Kim Ferrari	Fulton County: Prepare for inspection and file emergency application to stay with SCOPA; travel to inspection and attend same.	8.00	1,200.00
01/14/22	Maria Hunter	Fulton County: Research docket report to be included as exhibit to Notice of Appeal.	0.10	15.00
01/14/22	Maria Hunter	Fulton County: Review and update Notice of Appeal.	0.20	30.00
01/14/22	Maria Hunter	Fulton County: Review and update exhibits to Notice of Appeal and Jurisdictional Statement.	0.30	45.00
01/14/22	Robert Wiygul	Fulton County: Prepare for potential hearing before Judge Leavitt on status of parties' negotiations; review and conference with clients and team regarding order denying emergency applications to prevent inspection from going forward; draft appeal papers and emergency application seeking stay from Pa. Supreme Court.	4.80	2,112.00
01/14/22	Robert Wiygul	Attend public meeting in Fulton County; conferences with Pa. Supreme Court clerks and clients regarding order staying inspection; conference with R. Macias and Dominion's representatives about Fulton County proceedings (including return travel from Fulton County to Philadelphia)	4.70	2,068.00
01/16/22	Robert Wiygul	Fulton County: telephone conferences with E. Kagedan regarding strategy for Supreme Court filings and related research tasks.	1.40	616.00
01/17/22	Eitan Kagedan	Fulton County: Draft application and petition for permissive interlocutory review.	4.60	1,380.00
01/17/22	Kim Ferrari	Fulton County: Draft letter to court regarding appeal and send check for filing fee;	1.00	150.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/17/22	Robert Wiygul	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding case status and Supreme Court's stay of inspection.	0.20	88.00
01/17/22	Robert Wiygul	Fulton County: Telephone conference with K. Stimson regarding recent developments.	0.10	44.00
01/18/22	Eitan Kagedan	Fulton County: Review and develop response to Petitioners' Response to Emergency Application for Stay.	0.90	270.00
01/18/22	Eitan Kagedan	Fulton County: Revise and consider strategy regarding Motion for Permissive Interlocutory Appeal.	2.10	630.00
01/18/22	Eitan Kagedan	Fulton County: Review, comment on, and draft sections of, Reply in Support of Emergency Stay.	1.90	570.00
01/18/22	Kim Ferrari	Fulton County: Draft letter to court regarding appeal filed; coordinate payment of appeal fees.	1.00	150.00
01/18/22	Robert Wiygul	Conference with clients, OAG, and SUDC regarding IOC subpoena and Fulton County cases.	0.70 0.30	308.00 132.00
01/18/22	Robert Wiygul	Fulton County: Draft reply in support of SCOPA application for stay pending appeal.	6.80	2,992.00
01/19/22	Eitan Kagedan	Fulton County: Draft Response to Democratic Senators' Application to Participate.	0.40	120.00
01/19/22	Eitan Kagedan	Fulton County: Draft, revise, and finalize Reply in support of SCOPA Emergency Application for Stay.	3.00	900.00
01/19/22	Eitan Kagedan	Fulton County: Review filings ancillary to Emergency Application for Stay.	0.50	150.00
01/19/22	Kim Ferrari	Fulton County: Cite check and edit reply brief; gather key exhibits to same and file with SCOPA.	3.00	450.00
01/19/22	Robert Wiygul	Fulton County: Finish drafting, revise, and file reply in support of SCOPA application for stay pending appeal; communications with team and clients regarding same.	7.60	3,344.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/20/22	Kim Ferrari	Fulton County: Edit, finalize and file with PAC File the application regarding amicus filing of IOC Democratic Senators.	1.00	150.00
01/20/22	Robert Wiygul	Conference with clients and SUDC regarding status of and outlook for Fulton County case and IOC subpoena case.	0.50 0.20	220.00 88.00
01/20/22	Robert Wiygul	Fulton County: Review and revise response to Democrat Senators' amicus brief and communications with client regarding same; review order regarding response to Dominion's Jurisdictional Statement and communications with client regarding same.	0.80	352.00
01/21/22	Kim Ferrari	Fulton County: Draft no answer letter and file same.	0.50	75.00
01/22/22	Robert Wiygul	Fulton County: Review and analyze proposed amicus brief by Senators Corman and Dush and email clients and OAG regarding same.	0.90	396.00
01/23/22	Eitan Kagedan	Fulton County: Review and analyze Corman/Dush Amicus Brief.	0.80	240.00
01/24/22	Eitan Kagedan	Fulton County: Draft Response to Dush and Corman Amicus Application.	3.20	960.00
01/24/22	Robert Wiygul	Fulton County: Review order regarding response to Senators' application for leave to file amicus brief and communicate with clients regarding same; communicate with E. Kagedan regarding draft response; review draft response.	0.70	308.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/25/22	Eitan Kagedan	Fulton County: Revise and finalize Opposition to Dush/Corman Amicus filing.	1.50	450.00
01/25/22	Kim Ferrari	Fulton County: Edit response to Dush application and submit same to court.	1.00	150.00
01/25/22	Robert Wiygul	Fulton County: Revise response to application for leave to file amicus brief by Senators Dush and Corman.	2.70	1,188.00
01/26/22	Eitan Kagedan	Fulton County: Review court notices regarding appeal status.	0.20	60.00
01/27/22	Eitan Kagedan	Fulton County: Review and circulate Orders.	0.20	60.00

March 31, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40114406

Statement of services rendered and costs incurred through February 28, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
██████	██████	██ ██ ██ ██	████	████
██████	██████	██ ██	████	████
██████	██████	██ ██ ██ ██	████	████
02/02/22	Eitan Kagedan	Fulton County: Draft preliminary sections of Opening SCOPA Brief.	1.00	300.00
██████	██████	██ ██ ██ ██	████	████
██████	██████	██ ██	████	████
██████	██████	██ ██ ██ ██ ██	████	████
02/05/22	Robert Wiygul	Fulton County: Begin drafting opening appellate brief.	2.40	1,056.00
02/06/22	Robert Wiygul	Fulton County: Continue drafting opening appellate brief.	2.20	968.00
██████	██████	██ ██	████	████

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/10/22	Maria Hunter	Fulton County: Review and identify pleadings in Commonwealth Court matter and start drafting Reproduced Record for SCoPA appeal.	4.20	630.00
02/11/22	Maria Hunter	Fulton County: Review of Supreme Court and Commonwealth Court filings and continue identifying materials for inclusion in Reproduced Record.	4.70	705.00
02/13/22	Maria Hunter	Fulton County: Continued review of pleadings and filings and identification of materials for inclusion in Reproduced Record.	1.30	195.00
02/14/22	Maria Hunter	Fulton County: Review and update materials for potential inclusion in Reproduced Record.	1.20	180.00
02/14/22	Robert Wiygul	Fulton County: Continue drafting opening appellate brief.	2.60	1,144.00
02/14/22	Robert Wiygul	Fulton County: Review and comment on draft Reproduced Record.	0.60	264.00
02/15/22	Alexandra Arteaga	Fulton County: Prepare two No Answer letters.	1.00	150.00
02/15/22	Maria Hunter	Fulton County: Review and update Reproduced Record and Table of Contents to Reproduced Record.	6.60	990.00
02/15/22	Robert Wiygul	Conference with OAG and clients regarding pending matters, including IOC subpoena case and Fulton County.	0.40 0.20	176.00 88.00
02/15/22	Robert Wiygul	Fulton County: Finish drafting opening appellate brief.	6.30	2,772.00
02/15/22	Robert Wiygul	Fulton County: Review draft reproduced record and email M. Hunter regarding same; continue drafting appellate brief.	4.10	1,804.00
02/16/22	John Hill	Fulton County: Revise appellate brief.	1.30	325.00
02/16/22	Kim Ferrari	Fulton County: Cite check and edit brief of appellant; finalize reproduced records and file with PAC File.	7.00	1,050.00
02/16/22	Maria Hunter	Fulton County: Review, update, and number Reproduced Record and Table of Contents to Reproduced Record.	1.20	180.00
02/16/22	Robert Wiygul	Fulton County: Revise, finalize, and file initial appellate brief.	6.10	2,684.00

April 27, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40115037

Statement of services rendered and costs incurred through March 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/22	Eitan Kagedan	Fulton County: Review and analyze Opening Appellate brief in preparation for drafting Reply Brief.	0.90	270.00
03/09/22	Eitan Kagedan	Fulton County: Analyze Petitioners' SCOPA Response brief.	1.00	300.00
03/09/22	Eitan Kagedan	Fulton County: Review Dominion appellate briefing.	0.70	210.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/11/22	Eitan Kagedan	Fulton County: Research standard for prerogative appellate jurisdiction.	1.40	420.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/11/22	Eitan Kagedan	Fulton County: Identify key points for SCOPA Reply brief, including review of Dominion appellate briefing and research regarding the presumption of validity afforded to administrative action.	4.10	1,230.00
03/11/22	Robert Wiygul	Fulton County: Review and analyze Petitioners' answering brief in Supreme Court appeal; conference with E. Kagedan regarding strategy for reply brief.	0.90	396.00
03/14/22	Eitan Kagedan	Fulton County: Draft outline of procedure and standards for permissive interlocutory appeal and prerogative interlocutory appeal.	1.60	480.00
03/16/22	Robert Wiygul	Fulton County: Begin drafting SCOPA reply brief.	2.40	1,056.00
03/17/22	Robert Wiygul	Fulton County: Continue drafting SCOPA reply brief.	4.70	2,068.00
03/18/22	Eitan Kagedan	Fulton County: Review and revise SCOPA Reply brief.	1.60	480.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/18/22	Robert Wiygul	Fulton County: Finish drafting SCOPA reply brief; revise same and email clients regarding same.	6.00	2,640.00
03/20/22	Eitan Kagedan	Fulton County: Revise and discuss SCOPA Reply brief.	1.50	450.00
03/20/22	Robert Wiygul	Fulton County: Review and analyze comments on SCOPA reply brief by OAG and E. Kagedan; emails and conference with E. Kagedan regarding revisions to same.	1.80	792.00
03/21/22	Alexandra Arteaga	Fulton County: Review and analyze Reply Appellate Brief, check legal citations and quotations, and prepare tables of citations.	4.50	675.00
03/21/22	Eitan Kagedan	Fulton County: Revise, finalize and manage filing of SCOPA Reply Brief.	2.80	840.00
03/21/22	Robert Wiygul	Fulton County: Communications with E. Kagedan regarding client's comments on SCOPA reply brief and finalization of same.	0.30	132.00
03/23/22	Eitan Kagedan	Fulton County: Review and revise letter to court with archival copy of SCOPA Reply brief.	0.20	60.00

May 27, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40115643

Statement of services rendered and costs incurred through April 30, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/19/22	Eitan Kagedan	Fulton County: Review docket to confirm details surrounding Tom King's withdrawal of appearance.	0.20	60.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/19/22	Robert Wiygul	Fulton County: Review praecipe to withdraw appearance of T. King's firm; emails with OAG regarding Fulton County meeting minutes indicating substitution of counsel; research Fulton County's presumptive new counsel (Lambert and Carroll), including federal court opinion sanctioning Lambert; email clients regarding same.	1.20	528.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/21/22	Robert Wiygul	Conference with clients, OAG, and SUDC regarding Fulton County's new counsel, Senator Dush's Right to Know requests, and related matters.	--0.60 0.20	-264.00 88.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

June 30, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40116274

Statement of services rendered and costs incurred through May 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/05/22	Robert Wiygul	Weekly telephone conference with clients, OAG, and SUDC regarding proceedings against S. Lambert in Michigan and developments in related cases.	-0.40 0.20	-176.00 88.00
05/17/22	Robert Wiygul	Fulton County: Review SCOPA order directing oral argument and email clients regarding same.	0.20	88.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/24/22	Robert Wiygul	Fulton County: Prepare for and conference with clients regarding SCOPA briefing order and Commonwealth Court decision overruling preliminary objection.	-0:70- 0.20	--308:00- 88.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Totals:			<u>14.90</u>	<u>5,020.00</u>

<u>Timekeeper</u>	<u>Title</u>				<u>Total</u>
Robert Wiygul	Shareholder	5.00	hrs at	\$ 440 / hr	2,200.00
Eitan Kagedan	Associate	8.90	hrs at	\$ 300 / hr	2,670.00
Alexandra Arteaga	Paralegal	1.00	hrs at	\$ 150 / hr	150.00
Total Professional Charges					5,020.00

July 29, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40116916

Statement of services rendered and costs incurred through June 30, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/09/22	Robert Wiygul	Fulton County: Draft supplemental brief addressing appellate jurisdiction.	3.90	1,716.00
06/10/22	Robert Wiygul	Fulton County: Continue drafting supplemental brief addressing appellate jurisdiction.	7.00	3,080.00
06/11/22	Robert Wiygul	Fulton County: Finish drafting supplemental brief addressing appellate jurisdiction; emails to clients and team regarding same.	1.90	836.00
06/13/22	Eitan Kagedan	Fulton County: Review draft Supplemental Appellate Brief.	1.10	330.00
06/14/22	Eitan Kagedan	Fulton County: Review edits to Supplemental brief.	0.40	120.00
06/14/22	John Hill	Fulton County: Implement client's revisions to supplemental brief regarding Supreme Court's jurisdiction.	0.90	225.00
06/15/22	Alexandra Arteaga	Fulton County: Review, analyze, and cite check SCOPA brief addressing appellate jurisdiction and prepare tale of authorities for attorney review.	2.60	390.00
06/15/22	John Hill	Fulton County: Revise supplemental appellate brief.	0.60	150.00
06/16/22	Eitan Kagedan	Fulton County: Finalize and manage filing of supplemental brief.	0.30	90.00
06/16/22	John Hill	Fulton County: Implement R. Wiygul's revisions to supplemental appellate brief.	0.60	150.00
06/16/22	Robert Wiygul	Fulton County: Finalize supplemental brief addressing appellate jurisdiction.	1.10	484.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/21/22	Alexandra Arteaga	Fulton County: Review for filing today Brief addressing Appellate Jurisdiction with original signatures.	0.80	120.00
06/21/22	Eitan Kagedan	Fulton County: Prepare corrected filing of supplemental brief.	0.70	210.00
06/28/22	Robert Wiygul	Fulton County: Review entry of appearance by T. Carroll for Petitioners and emails with clients and A. Thompson regarding same.	0.30	132.00
06/30/22	Robert Wiygul	Attend weekly conference with clients, OAG, SUDC, and J. Matz to discuss status of Fulton County case and related election-law proceedings.	0.30 0.20	132.00 88.00

August 30, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40117516

Statement of services rendered and costs incurred through July 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/05/22	Alexandra Arteaga	Fulton County: Review and analyze docket report and circulate court imposed deadlines.	0.20	30.00
07/05/22	Robert Wiygul	Fulton County: Review oral argument notice from SCOPA and email clients regarding same.	0.20	88.00
07/07/22	Robert Wiygul	Weekly conference call with clients, OAG, SUDC, and J. Matz regarding status of Fulton County case and related election-law developments.	-0.20 0.10	88.00- 44.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/15/22	Alexandra Arteaga	Fulton County: Review and finalize for filing Acknowledgement of Argument Notice and circulate arguments dates internally.	0.70	105.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/15/22	Robert Wiygul	Fulton County: Review supplemental disclosure statement by Justice Brobson and email clients regarding same.	0.30	132.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/20/22	Alexandra Arteaga	Fulton County: Review and analyze docket report and circulate court imposed deadlines for attorney review.	0.30	45.00
07/20/22	Robert Wiygul	Fulton County: Review letter from Prothonotary regarding appellees' overdue supplemental brief; email to clients regarding same.	0.30	132.00
07/21/22	Robert Wiygul	Participate in weekly conference call with clients, OAG, and SUDC regarding Fulton County case and other matters.	-0:50 0.10	220.00 44.00
07/21/22	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding case status, discovery strategy, and oral argument strategy.	-0:90 0.30	396.00 132.00
07/26/22	Robert Wiygul	Fulton County: Review letter to Petitioners' counsel from Prothonotary and email clients regarding same.	0.30	132.00
07/27/22	Robert Wiygul	Fulton County: Email clients regarding recent filings and response to Petitioners' nunc pro tunc application for extension of time to file supplemental brief; conference with J. Hill regarding same.	0.40	176.00
07/28/22	Alexandra Arteaga	Fulton County: Review and analyze court imposed deadlines and circulate updates record for attorney review.	0.30	45.00
07/28/22	John Hill	Weekly conference with clients and election team co-counsel for update and strategy call regarding Fulton County case and other matters; follow-up conference with R. Wiygul regarding next steps.	-0:50 0.10	-125.00 25.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/28/22	Robert Wiygul	Fulton County: Revise letter to Prothonotary responding to Petitioners' nunc pro tunc motion for extension of time to file supplemental appellate brief; email to clients regarding same.	0.20	88.00
07/28/22	Robert Wiygul	Participate in weekly call with clients, OAG, SUDC, and J. Matz regarding Fulton County case and related matters; follow up call with J. Hill regarding next steps.	0.80 0.30	352.00 132.00
07/29/22	Alexandra Arteaga	Fulton County: Review and finalize No Answer Letter to Motion Nunc Pro Tunc for Leave to File Appellees' Supplemental Brief.	0.30	45.00

September 30, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40118122

Statement of services rendered and costs incurred through August 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/10/22	Robert Wiygul	Fulton County: Review letter from SCOPA Prothonotary to counsel for Petitioners; email to clients regarding same.	0.30	132.00
08/22/22	Robert Wiygul	Fulton County: Telephone conference with B. Minner (Court Crier) regarding Supreme Court oral argument.	0.10	44.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/23/22	Robert Wiygul	Fulton County: Review file and email A. Arteaga regarding creation of binder in preparation for oral argument.	1.10	484.00
08/24/22	Alexandra Arteaga	Fulton County: Review and analyze materials for attorney review in preparation of upcoming oral argument.	0.40	60.00

October 31, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40118763

Statement of services rendered and costs incurred through September 30, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/22	Eitan Kagedan	Fulton County: Plan and prepare for oral argument, including identification of key projects in advance of argument.	0.50	150.00
09/01/22	Eitan Kagedan	Fulton County: Research caselaw supporting agency enjoining unauthorized conduct.	0.30	90.00
09/02/22	Eitan Kagedan	Fulton County: Research issues related to forfeiture of argument on appeal.	0.50	150.00
09/02/22	Robert Wiygul	Fulton County: Emails with team and client regarding moot of oral argument; begin examining briefing in preparation for moot.	0.50	220.00
09/05/22	Mark A. Aronchick	Fulton County: Reviewing briefs in preparation for moot court.	3.50	1,540.00
09/06/22	Mark A. Aronchick	Fulton County: Continuing preparation for moot court.	1.30	572.00
09/07/22	Alexandra Arteaga	Fulton County: Review, analyze, and identify caselaw cited in briefing and prepare report for attorney review in preparation for oral argument.	1.50	225.00
09/07/22	Eitan Kagedan	Fulton County: Review Commonwealth Court and Supreme Court briefing to prepare key case binder and develop questions for moot to assist in preparation for oral argument.	3.50	1,050.00
09/07/22	Mark A. Aronchick	Fulton County: Reading through briefs for meeting with R. Wiygul.	1.00	440.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/08/22	Alexandra Arteaga	Fulton County: Review, identify, and gather case law cited in briefing, as well as statutes and rules in preparation for upcoming oral argument.	0.80	120.00
09/08/22	Eitan Kagedan	Fulton County: Prepare for oral argument.	0.70	210.00
09/08/22	Mark A. Aronchick	Fulton County: Preparation for and moot court of R. Wiygul.	0.30	132.00
09/09/22	Eitan Kagedan	Fulton County: Prepare for and participate in moot.	1.40	420.00
09/09/22	John Hill	Fulton County: Attend oral argument moot.	1.20	300.00
09/09/22	Robert Wiygul	Fulton County: Prepare for and conduct moot of Supreme Court oral argument.	3.90	1,716.00
09/12/22	Eitan Kagedan	Fulton County: Review Motion to Continue Oral Argument and related communications.	0.20	60.00
09/13/22	Alexandra Arteaga	Fulton County: Review correspondence received by the court in connection with oral argument scheduled for 10/26	0.20	30.00
09/19/22	Alexandra Arteaga	Fulton County: Review oral-argument counsel designations for RAW and submit to the court ahead of the 10/26 oral argument.	0.40	60.00
09/21/22	Eitan Kagedan	Fulton County: Review materials related to Speckin Inspection.	0.80	240.00
09/21/22	Eitan Kagedan	Fulton County: Conduct research in support of agency's right to prospective injunctive relief.	0.30	90.00
09/21/22	Robert Wiygul	Fulton County: Review Fulton County's complaint against Dominion and accompanying Speckin Forensics report; telephone conference with S. Gallagher (Dominion's counsel) regarding same.	0.90	396.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/23/22	Eitan Kagedan	Fulton County: Confer with Ryan Macias regarding Speckin inspection.	0.50	150.00
09/23/22	Eitan Kagedan	Fulton County: Confer with R. Wiygul regarding response to Speckin inspection.	0.60	180.00
09/23/22	Eitan Kagedan	Fulton County: Confer with client team regarding response to Speckin inspection.	0.50	150.00
09/23/22	Robert Wiygul	Conferences with R. Macias and clients regarding Fulton County's complaint against Dominion and related third-party inspection; telephone conference with E. Kagedan regarding next steps.	2.30	1,012.00
09/24/22	Gianni Mascioli	Fulton County: Call R. Wiygul to discuss research needed for potential contempt motion.	0.40	100.00
09/24/22	Gianni Mascioli	Fulton County: Call R. Wiygul to discuss next steps and assistance needed with contempt motion.	0.40	100.00
09/26/22	Gianni Mascioli	Fulton County: Research potential claims against opposing party in connection with potential contempt order.	0.80	200.00
09/26/22	Robert Wiygul	Fulton County: Telephone conference with B. DeLone and S. Kirkpatrick regarding response to third-party inspection of voting machines; email to T. Gates regarding same.	0.40	176.00
09/27/22	Gianni Mascioli	Fulton County: Research law governing civil contempt in Pennsylvania.	2.40	600.00
09/27/22	Gianni Mascioli	Fulton County: Research law governing spoliation of evidence in Pennsylvania for potential contempt motion.	2.30	575.00
09/28/22	Eitan Kagedan	Fulton County: Review research from Gianni Mascioli on standards for contempt and sanctions related to Speckin inspection in anticipation of drafting contempt motion.	0.90	270.00
09/28/22	Eitan Kagedan	Fulton County: Draft Motion for Contempt.	1.20	360.00
09/28/22	Gianni Mascioli	Fulton County: Draft memo to E. Kagedan and R. Wiygul summarizing research on civil contempt and spoliation of evidence.	1.80	450.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/28/22	Gianni Mascioli	Fulton County: Call E. Kagedan to discuss additional research needed for contempt motion.	0.20	50.00
09/28/22	Gianni Mascioli	Fulton County: Research compensatory remedies for civil contempt.	1.20	300.00
09/28/22	Gianni Mascioli	Fulton County: Research remedies for litigation misconduct.	1.20	300.00
09/28/22	Gianni Mascioli	Fulton County: Research authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.20	300.00
09/28/22	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding contempt application.	0.40	176.00
09/29/22	Eitan Kagedan	Fulton County: Draft Motion for Contempt.	6.10	1,830.00
09/29/22	Eitan Kagedan	Fulton County: Review research findings in support of Motion for Contempt.	0.50	150.00
09/29/22	Gianni Mascioli	Fulton County: Continue researching authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.40	350.00
09/29/22	Gianni Mascioli	Fulton County: Research Pennsylvania statutory and case law on available sanctions for preservation order violations.	1.70	425.00
09/29/22	Gianni Mascioli	Fulton County: Prepare supplemental memo to E. Kagedan summarizing additional research on litigation misconduct and available sanctions therefor.	1.70	425.00
09/29/22	Gianni Mascioli	Fulton County: Correspond further with E. Kagedan to elaborate on additional research in support of contempt motion.	0.30	75.00
09/30/22	Eitan Kagedan	Fulton County: Complete and revise draft Motion for Contempt.	5.60	1,680.00

November 22, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40119322

Statement of services rendered and costs incurred through October 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/04/22	Eitan Kagedan	Fulton County: Research to support executive agency's entitlement to prospective injunctive relief for Supreme Court oral argument.	1.30	390.00
10/06/22	Eitan Kagedan	Fulton County: Reframe argument section of Motion for Contempt and Sanctions.	5.20	1,560.00
10/06/22	Gianni Mascioli	Fulton County: Complete supplemental research on Pennsylvania courts' inherent authority to sanction violations of procedural and discovery orders to include in motion for contempt and sanctions.	1.30	325.00
10/06/22	Gianni Mascioli	Fulton County: Draft section of motion for sanctions regarding Pennsylvania courts' inherent authority to sanction a party with dismissal with prejudice.	1.60	400.00
10/06/22	Gianni Mascioli	Fulton County: Revise and line-edit introduction and contempt-related sections of draft motion for sanctions.	2.20	550.00
10/06/22	Robert Wiygul	Fulton County: Telephone conference with S. Gallagher regarding Petitioners' Fulton County complaint against Dominion.	0.50	220.00
10/06/22	Robert Wiygul	Fulton County: Telephone conference with Court Crier regarding upcoming oral argument; revise application to hold Petitioners in contempt.	0.80	352.00
10/07/22	Eitan Kagedan	Fulton County: Draft Affidavit of Ryan Macias in support of Motion for Contempt.	1.20	360.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/07/22	Robert Wiygul	Fulton County: Review draft of sanctions motion; research case law cited in same and additional case law regarding contempt and other authorities for sanctions; begin revising and supplementing contempt motion.	5.30	2,332.00
10/08/22	Robert Wiygul	Fulton County: Continue revising and supplementing application to hold Petitioners in contempt.	13.80	6,072.00
10/09/22	Robert Wiygul	Fulton County: Finish supplementing and revising motion for contempt and sanctions.	10.40	4,576.00
10/10/22	Robert Wiygul	Fulton County: Further revise contempt application and email clients transmitting same.	0.60	264.00
10/12/22	Eitan Kagedan	Fulton County: Review edits to Motion for Contempt and Sanctions.	0.70	210.00
10/12/22	Eitan Kagedan	Fulton County: Consider additions and revisions to Motion for Contempt.	0.20	60.00
10/13/22	Eitan Kagedan	Fulton County: Revise Macias declaration in support of Motion for Contempt.	1.20	360.00
10/13/22	Robert Wiygul	Attend weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.50 0.30	220.00 132.00
10/14/22	Eitan Kagedan	Fulton County: Review proposed edits and comments on Motion for Contempt.	0.40	120.00
10/16/22	Robert Wiygul	Fulton County: Revise application to hold Petitioners in contempt and support affidavit of R. Macias; email to R. Macias regarding same; draft verification of application.	4.30	1,892.00
10/17/22	Alexandra Arteaga	Fulton County: Gather and review exhibits for Macias Affidavit in support of Motion for Contempt.	0.60	90.00
10/17/22	Robert Wiygul	Fulton County: Review R. Macias's edits to affidavit in support of contempt application; videoconference with R. Macias regarding same; propose further revisions to affidavit and emails with R. Macias regarding same; emails with A. Arteaga regarding finalizing contempt motion for filing.	2.10	924.00
10/18/22	Alexandra Arteaga	Fulton County: Review and revise exhibits re Motion for Sanctions.	0.50	75.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/18/22	Alexandra Arteaga	Fulton County: Review and finalize for filing Motion for Sanctions and supporting exhibits.	0.90	135.00
10/18/22	Alexandra Arteaga	Fulton County: Review and finalize verification re Motion for Sanctions.	0.20	30.00
10/18/22	Robert Wiygul	Fulton County: Revise and finalize contempt application; communications with clients and A. Arteaga regarding same.	3.10	1,364.00
10/19/22	Eitan Kagedan	Fulton County: Research on preemptive injunctive relief in preparation for Supreme Court oral argument.	0.70	210.00
10/20/22	Eitan Kagedan	Fulton County: Review Petitioners' submission in response to Application for Contempt.	0.20	60.00
10/20/22	Eitan Kagedan	Fulton County: Prepare for Oral Argument on Appeal.	0.60	180.00
10/20/22	Mark A. Aronchick	Fulton County: Review previous filings in connection with possibly mooted next week's argument.	0.80	352.00
10/21/22	Eitan Kagedan	Fulton County: Prepare for Oral Argument.	0.60	180.00
10/21/22	Mark A. Aronchick	Fulton County: Continued review of filings in connection with possibly mooted next week.	0.60	264.00
10/24/22	Eitan Kagedan	Fulton County: Develop discovery strategy for Motion for Contempt.	2.00	600.00
10/24/22	Eitan Kagedan	Fulton County: Review and consider submission directed by Special Master's Scheduling Order.	2.30	690.00
10/24/22	Eitan Kagedan	Fulton County: Draft memorandum of law on nature of contempt proceedings as requested by Special Master.	3.10	930.00
10/24/22	Gianni Mascioli	Fulton County: Call E. Kagedan to discuss research questions to address ahead of scheduled hearing on motion for sanctions against opposing party.	0.10	25.00
10/24/22	Gianni Mascioli	Fulton County: Prepare note to E. Kagedan summarizing certain research findings ahead of scheduled hearing on motion for sanctions against opposing party.	0.50	125.00

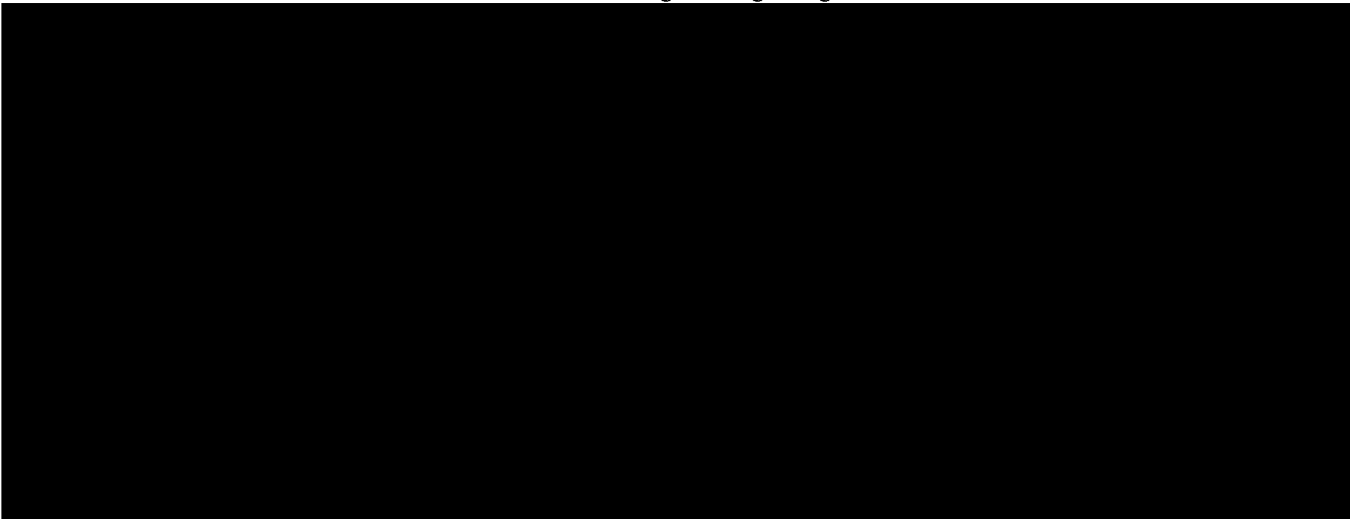
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/24/22	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding strategy and research for contempt proceeding; review Order by Special Master; email to clients regarding same; research contempt case law in preparation for drafting memorandum of law in compliance with Special Master's Order.	3.20	1,408.00
10/25/22	Eitan Kagedan	Fulton County: Continue drafting memorandum of law on nature of contempt proceedings as requested by Special Master.	3.20	960.00
10/25/22	Eitan Kagedan	Fulton County: Follow up research regarding anticipated issues in contempt proceedings.	0.80	240.00
10/25/22	Eitan Kagedan	Fulton County: Draft discovery requests.	2.20	660.00
10/25/22	Robert Wiygul	Fulton County: Telephone conference with A. Arteaga regarding prospective evidentiary hearing and obtaining subpoenas; email to Court staff regarding WebEx status conference; telephone conference with Dominion's outside counsel regarding status.	0.60	264.00
10/25/22	Robert Wiygul	Fulton County: Revise memorandum of law required by October 24 Order.	1.40	616.00
10/26/22	Alexandra Arteaga	Fulton County: Review and cite check memo of law on nature of relief.	2.10	315.00
10/26/22	Alexandra Arteaga	Fulton County: Review and analyze law on nature of relief, prepare Table of Authorities, and finalize for filing.	1.40	210.00
10/26/22	Alexandra Arteaga	Fulton County: Review local rules re deposition subpoenas and contact the Commonwealth Court to obtain subpoenas.	0.60	90.00
10/26/22	Eitan Kagedan	Fulton County: Review and edit Memorandum of Law concerning nature of relief sought.	1.90	570.00
10/26/22	Eitan Kagedan	Fulton County: Review filings related to Motion for Contempt in preparation for discovery.	1.00	300.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/26/22	Robert Wiygul	Fulton County: Revise and supplement memorandum of law required by October 24 Order; review comments by clients and OAG and further revise; finalize and file memorandum of law; review and analyze Petitioners' Answer to contempt application and memorandum of law regarding civil v. criminal contempt; emails to clients and R. Macias regarding same.	10.00	4,400.00
10/27/22	Eitan Kagedan	Fulton County: Revise discovery requests in support of Motion for Contempt.	1.00	300.00
10/27/22	Eitan Kagedan	Fulton County: Research concerning limits to scope of contempt proceedings and procedural requirements in preparation for status conference.	1.90	570.00
10/27/22	Eitan Kagedan	Fulton County: Meet with client team to discuss issues related to Motion for Contempt.	0.80	240.00
10/27/22	Eitan Kagedan	Fulton County: Prepare for, attend, and follow up regarding status conference on Motion for Contempt.	2.50	750.00
10/27/22	Gianni Mascioli	Fulton County: Prepare note to E. Kagedan summarizing additional research findings ahead of hearing before Special Master.	0.60	150.00
10/27/22	Robert Wiygul	Fulton County: Conference with clients and OAG in preparation for status conference; follow-up conference with E. Kagedan regarding same.	0.80	352.00
10/27/22	Robert Wiygul	Fulton County: Prepare for and participate in status conference; follow-up conferences with E. Kagedan and R. Macias regarding scheduling and discovery issues; emails with Petitioners' counsel regarding scheduling issues.	3.00	1,320.00
10/27/22	Robert Wiygul	Fulton County: Revise draft document requests relating to contempt proceeding.	1.00	440.00
10/28/22	Alexandra Arteaga	Fulton County: Review and analyze Proposed Scheduling Order and finalize for filing	0.70	105.00
10/28/22	Alexandra Arteaga	Fulton County: Review and analyze discovery requests and draft cover letter for service of the same.	0.20	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/28/22	Eitan Kagedan	Fulton County: Call with opposing counsel concerning scheduling issue; draft proposed scheduling order.	2.80	840.00
10/28/22	Eitan Kagedan	Fulton County: Draft proposed factual stipulations.	3.30	990.00
10/28/22	Eitan Kagedan	Fulton County: Research concerning potential privilege claims by Petitioners.	0.80	240.00
10/28/22	Eitan Kagedan	Fulton County: Review Special Master's scheduling order and related communications.	0.40	120.00
10/28/22	Maria Hunter	Fulton County: Review Order regarding Rule to Show Cause hearing and update matter calendar.	0.10	15.00
10/28/22	Maria Hunter	Fulton County: Review communications from counsel regarding court requirements regarding transcript for hearing and communications with court reporters regarding availability.	0.20	30.00
10/28/22	Robert Wiygul	Fulton County: Prepare for and conduct telephone conference with counsel for Petitioners and Intervenor regarding schedule; draft submission to Special Master regarding same; communications with clients regarding same; review Petitioners' submission and email clients regarding same; revise document requests and communicate with clients regarding same; finalize and serve document requests; review scheduling Order entered by Court and communicate with clients regarding same; serve Order on Petitioners' counsel and draft and file proof of service.	7.80	3,432.00
10/29/22	Robert Wiygul	Fulton County: Review and analyze Petitioners' contempt-related filings to develop discovery requests and rebuttal arguments.	2.50	1,100.00
10/30/22	Eitan Kagedan	Fulton County: Complete drafts of Interrogatories and Requests for Admission.	1.80	540.00
10/30/22	Maria Hunter	Fulton County: Review correspondence from counsel regarding depositions.	0.10	15.00
10/30/22	Maria Hunter	Fulton County: Communications with Court Reporting Agency scheduling videographer, court reporter and exhibit technician for remote depositions.	0.30	45.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/30/22	Maria Hunter	Fulton County: Draft Notice of Remote Video Deposition directed to S. Ulsh pursuant to Pennsylvania rules.	0.50	75.00
10/30/22	Robert Wiygul	Fulton County: Draft and revise interrogatories and requests for admission and research anticipated privilege issues; communications with E. Kagedan regarding interrogatories and requests for admission.	6.20	2,728.00
10/30/22	Robert Wiygul	Fulton County: Email M. Hunter regarding video deposition notices directed to Commissioners; telephone conferences with E. Kagedan regarding next steps in assembling interrogatories and requests for admissions and strategy for responding to Petitioners' anticipated objections; revise deposition notice and communicate with M. Hunter regarding same.	1.40	616.00
10/31/22	Eitan Kagedan	Fulton County: Draft responses to Fulton County's written discovery requests.	4.80	1,440.00
10/31/22	Eitan Kagedan	Fulton County: Review, revise, and finalize Interrogatories, Requests for Admission, and Proposed Deposition Questions.	2.50	750.00
10/31/22	Eitan Kagedan	Fulton County: Review and consider responses to Fulton County's discovery requests to Dominion and the Secretary.	1.80	540.00
10/31/22	Eitan Kagedan	Fulton County: Research to support motion to compel discovery.	0.60	180.00
10/31/22	Maria Hunter	Fulton County: Various communications with Frontino Reporting regarding deposition and hearing logistics.	0.30	45.00
10/31/22	Maria Hunter	Fulton County: Review, update, finalize and submit Notices of Remote Video depositions directed to S. Ulsh, P. Shives and R. Bunch.	1.10	165.00
10/31/22	Maria Hunter	Fulton County: Review, update, and finalize discovery requests.	0.80	120.00
10/31/22	Robert Wiygul	Fulton County: Telephone conference with R. Macias regarding Petitioners' discovery requests and schedule for preparing for evidentiary hearing.	0.40	176.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/31/22	Robert Wiygul	Fulton County: Revise, supplement, and finalize interrogatories, requests for admission, proposed deposition questions, and notices of deposition directed to Fulton County Commissioners; communications with clients and E. Kagedan regarding same; review emails from "AttorneyLambert" email address purporting to contain discovery requests and analyze same; communications with clients and E. Kagedan regarding same.	6.90	3,036.00



December 8, 2022

Timothy E. Gates, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40119467

Statement of services rendered and costs incurred through November 30, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/22	Eitan Kagedan	Fulton County: Draft responses to Petitioners' Interrogatories and Requests for Admission.	2.80	840.00
11/01/22	Eitan Kagedan	Fulton County: Develop strategy for completing discovery and litigating discovery issues.	0.40	120.00
11/01/22	Eitan Kagedan	Fulton County: Draft Motion to Compel Deposition Appearances.	3.20	960.00
11/01/22	Maria Hunter	Fulton County: Various communications with Frontino Reporting regarding court reporter for evidentiary hearing.	0.20	30.00
11/01/22	Maria Hunter	Fulton County: Draft Notices to Attend directed to R. Bunch, S. Ulsh and P. Shives.	0.20	30.00
11/02/22	Eitan Kagedan	Fulton County: Revise and finalize written discovery responses.	1.40	420.00
11/02/22	Eitan Kagedan	Fulton County: Review and analyze Petitioners' Application for Injunction and plan response.	3.30	990.00
11/02/22	Eitan Kagedan	Fulton County: Draft and revise verifications for filings.	0.30	90.00
11/02/22	Eitan Kagedan	Fulton County: Research concerning scope and contours of deliberative process privilege in response to Petitioners' filings.	0.50	150.00
11/02/22	Eitan Kagedan	Fulton County: Revise Motion to Compel Deposition Appearances per R. Wiygul's comments.	2.10	630.00
11/02/22	Maria Hunter	Fulton County: Prepare copies of exhibits for potential use at hearing.	1.40	210.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/02/22	Maria Hunter	Fulton County: Review, update, and finalize Secretary's Responses and Objections to Petitioners' Requests for Discovery.	0.70	105.00
11/02/22	Maria Hunter	Fulton County: Review, update, finalize and file Entry of Appearance of E. Kagedan.	0.40	60.00
11/02/22	Maria Hunter	Fulton County: Communications with Pennsylvania Supreme Court regarding E. Kagedan's Entry of Appearance.	0.20	30.00
11/02/22	Robert Wiygul	Fulton County: Review and analyze SCOPA order referring Petitioners' application to enjoin discovery to Special Master and consider next steps; email clients regarding same.	0.60	264.00
11/02/22	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding SCOPA order reimposing discovery schedule and next steps.	0.30	132.00
11/02/22	Robert Wiygul	Fulton County: Review and revise draft responses to Petitioners' discovery responses; finalize and serve requests; review and analyze Petitioners' emergency application to enjoin discovery and email clients regarding same; review Justice Wecht's order temporarily enjoining discovery and email clients regarding same.	4.10	1,804.00
11/03/22	Eitan Kagedan	Fulton County: Review and incorporate revisions to motion to compel depositions.	1.60	480.00
11/03/22	Eitan Kagedan	Fulton County: Review strategy notes for upcoming status conference.	0.20	60.00
11/03/22	Eitan Kagedan	Fulton County: Continue researching contours of deliberative process privilege in response to Petitioners' filings.	1.10	330.00
11/03/22	Eitan Kagedan	Fulton County: Review Petitioners' responses to the Secretary's discovery requests and draft notice concerning deficiencies.	1.30	390.00
11/03/22	Eitan Kagedan	Fulton County: Identify and prepare exhibits for evidentiary hearing.	2.80	840.00
11/03/22	Eitan Kagedan	Fulton County: Draft application for discovery sanctions.	4.30	1,290.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/22	Maria Hunter	Fulton County: Review, update, finalize and file Motion to Compel Depositions and prepare exhibits in support.	2.20	330.00
11/03/22	Maria Hunter	Fulton County: Various communications with counsel and Court Reporting Agency regarding depositions.	1.30	195.00
11/03/22	Maria Hunter	Fulton County: Various communications with Frontino regarding court reporter for evidentiary hearing.	0.30	45.00
11/03/22	Maria Hunter	Fulton County: Review, update, and finalize Notice to the Court regarding Petitioners' Response and Objections to the Secretary's discovery.	0.60	90.00
11/03/22	Maria Hunter	Fulton County: Review and update documents designated for potential use at evidentiary hearing.	1.60	240.00
11/03/22	Robert Wiygul	Fulton County: Review and analyze Petitioners' discovery responses; conference with E. Kagedan regarding Notice to the Court; revise Notice to Court and email clients regarding same; review Special Master's Order; emails with clients regarding same; revise and serve Notices to Attend the evidentiary hearing and email clients regarding same.	1.80	792.00
11/03/22	Robert Wiygul	Fulton County: Revise verifications of discovery responses and email clients regarding same; revise motion to compel depositions and email clients regarding same.	2.10	924.00
11/04/22	Eitan Kagedan	Fulton County: Continue drafting application for discovery sanctions.	4.70	1,410.00
11/04/22	Eitan Kagedan	Fulton County: Review Petitioners' filing Motion for Predicate Legal Rulings and prepare for status conference.	4.10	1,230.00
11/04/22	Maria Hunter	Fulton County: Review Commonwealth Court protocols for Court Reporters, and communications with counsel and Agency regarding same.	0.90	135.00
11/04/22	Maria Hunter	Fulton County: Coordinate tech systems for Status Conference call with Court.	0.30	45.00
11/04/22	Maria Hunter	Fulton County: Review, update, finalize and file Application for Discovery Sanctions.	1.30	195.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/05/22	Robert Wiygul	Fulton County: Review and analyze potential deposition and hearing exhibits in preparation for depositions and hearings and filing of exhibit list.	2.20	968.00
11/06/22	Eitan Kagedan	Fulton County: Finish drafting expert examination outline and videoconference with Ryan Macias to prepare for hearing.	6.00	1,800.00
11/06/22	Eitan Kagedan	Fulton County: Identify and prepare additional exhibits for evidentiary hearing.	1.60	480.00
11/06/22	Robert Wiygul	Fulton County: Review outline of R. Macias examination; conference with R. Macias regarding testimony at evidentiary hearing; conference with E. Kagedan regarding revisions to outline of R. Macias examination.	1.70	748.00
11/07/22	Eitan Kagedan	Fulton County: Draft Exhibit and Witness List.	1.00	300.00
11/07/22	Eitan Kagedan	Fulton County: Prepare for examination of R. Macias and videoconference with R. Macias regarding same.	2.50	750.00
11/07/22	John Hill	Fulton County: Revise response in opposition to Petitioners' emergency application for injunction filed in Pa. Supreme Court.	0.50	125.00
11/07/22	Maria Hunter	Fulton County: Various communications with Frontino regarding Court Reporter for Evidentiary Hearing.	0.20	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
██████	██████	██ ██ ██	████	████
11/07/22	Maria Hunter	Fulton County: Review of transcript of November 4 Status Conference.	0.20	30.00
11/07/22	Maria Hunter	Fulton County: Review of Pa. Supreme Court Letter scheduling deadline for Response to Petitioners' Emergency Application for injunction.	0.10	15.00
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██████	██████	██ ██ ██	████	████
11/07/22	Maria Hunter	Fulton County: Review and update list of Secretary's Hearing Exhibits.	0.70	105.00
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11/07/22	Robert Wiygul	Conference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	0.50 0.20	220.00 88.00
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/07/22	Robert Wiygul	Fulton County: Videoconference with R. Macias to prepare for hearing testimony; conference with E. Kagedan regarding revisions to witness and exhibit lists and estimate of time needed to present case.	1.40	616.00
11/08/22	Eitan Kagedan	Fulton County: Prepare for evidentiary hearing, including review of examination outlines, preparation of documentary materials.	5.00	1,500.00
11/08/22	Eitan Kagedan	Fulton County: Manage filing of exhibit and witness lists and preparation of copies of exhibits for evidentiary hearing.	1.40	420.00
11/08/22	Eitan Kagedan	Fulton County: Draft Applications for order requiring Petitioners' counsel to verify that Commissioners have been provided with Notices to Attend evidentiary hearing and related orders.	0.80	240.00
11/08/22	Eitan Kagedan	Fulton County: Research issues related to Petitioners' Motion to Suspend Proceedings.	0.40	120.00
11/08/22	Eitan Kagedan	Fulton County: Travel to Harrisburg.	2.00	600.00
11/08/22	Eitan Kagedan	Fulton County: Analyze exhibits to identify those for which to seek lay foundation and admission at evidentiary hearing.	0.40	120.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
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11/08/22	Maria Hunter	Fulton County: Review, update, finalize and file The Secretary's Exhibit and Witness List.	0.60	90.00
11/08/22	Maria Hunter	Fulton County: Review and update exhibits and other materials for potential use at hearing.	1.60	240.00
11/08/22	Maria Hunter	Fulton County: Communications with Clerk of Court regarding exhibit assembly and presentation preference.	0.10	15.00
11/08/22	Maria Hunter	Fulton County: Prepare archival paper copies of Secretary's filings since October 21, 2022 for delivery to Commonwealth Court.	0.50	75.00
11/08/22	Maria Hunter	Fulton County: Review, update, finalize and file Secretary's Application for Relief Concerning Evidentiary Hearing.	0.80	120.00
11/08/22	Maria Hunter	Prepare trial notebook for evidentiary hearing at counsel's direction.	1.40	210.00
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11/08/22	Maria Hunter	Fulton County: Review and update hearing outline for examination of Commissioners with references to hearing exhibits.	1.20	180.00
11/08/22	Maria Hunter	Fulton County: Travel from Narberth to Harrisburg for evidentiary hearing.	1.50	225.00
11/08/22	Robert Wiygul	Fulton County: Attend conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.30 0.10	44.00 44.00
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11/08/22	Robert Wiygul	Fulton County: Revise application for relief regarding evidentiary hearing and email clients regarding same.	0.90	396.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/08/22	Robert Wiygul	Fulton County: Review potential exhibits and examination outline and conference with team in preparation for evidentiary hearing (including travel between Philadelphia and Harrisburg).	3.50	1,540.00
11/09/22	Eitan Kagedan	Fulton County: Prepare, appear for, and follow up regarding evidentiary hearing.	10.50	3,150.00
11/09/22	Maria Hunter	Plan for and attend Evidentiary Hearing on Application for Contempt.	10.00	1,500.00
11/09/22	Robert Wiygul	Fulton County: Prepare for and participate in evidentiary hearing; conference with co-counsel regarding strategy; conference with R. Macias regarding expert testimony.	10.90	4,796.00
11/10/22	Eitan Kagedan	Fulton County: Prepare for, appear for, and follow up concerning Evidentiary Hearing (including travel from Harrisburg to Philadelphia).	14.00	4,200.00
11/10/22	Maria Hunter	Fulton County: Plan for and attend second day of Evidentiary Hearing.	11.50	1,725.00
11/10/22	Maria Hunter	Fulton County: Travel from Harrisburg to Narberth following evidentiary hearing.	1.80	270.00
11/10/22	Robert Wiygul	Fulton County: Prepare for and attend second day of evidentiary hearing (including travel from Harrisburg to Philadelphia).	13.10	5,764.00
11/11/22	Eitan Kagedan	Fulton County: Begin drafting Proposed Findings of Fact.	6.80	2,040.00
11/11/22	John Hill	Fulton County: Research and analyze issues arising during contempt hearing regarding ultra vires actions of Commissioners Ulsh and Bunch in preparation for drafting post-hearing submission.	2.50	625.00
11/11/22	Maria Hunter	Fulton Hearing: Post-Hearing organization of materials used at hearing in Harrisburg.	0.50	75.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/11/22	Maria Hunter	Fulton County: Communications with Frontino Reporting regarding Court Reporter and exhibit tech for continued Evidentiary Hearing, scheduled for Monday, November 14, 2022.	0.40	60.00
11/11/22	Maria Hunter	Fulton County: Review of Court Orders regarding continued Evidentiary Hearing and regarding preservation of key access log document.	0.20	30.00
11/11/22	Maria Hunter	Fulton County: Upload the Secretary's hearing exhibits to Court's site for continued hearing.	0.10	15.00
11/11/22	Robert Wiygul	Fulton County: Telephone conference with M. Fischer regarding evidentiary hearing and next steps.	0.30	132.00
11/11/22	Robert Wiygul	Fulton County: Telephone conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.60 0.30	-264.00 132.00
11/11/22	Robert Wiygul	Fulton County: Email court staff regarding access needed to upload exhibits and need for trial tech; email R. Macias following up on hearing.	0.30	132.00
11/11/22	Robert Wiygul	Fulton County: Begin reviewing and annotating hearing transcripts in preparation for drafting post-hearing submission; research case law regarding Fifth Amendment and adverse-inference issues to address in post-hearing submission.	5.10	2,244.00
11/12/22	Eitan Kagedan	Fulton County: Continue drafting Proposed Findings of Fact.	4.40	1,320.00
11/12/22	Robert Wiygul	Fulton County: Continue reviewing and annotating hearing transcripts in preparation for drafting post-hearing brief and conference with E. Kagedan regarding draft of proposed findings of fact; research implications of voting-machine inspections' having been conducted without a vote of the Board of Elections.	3.40	1,496.00
11/13/22	Eitan Kagedan	Fulton County: Continuing drafting and revising Proposed Findings of Fact.	10.70	3,210.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/13/22	Robert Wiygul	Fulton County: Research unclean hands doctrine as basis for dismissing lawsuit; analyze and annotate Petitioners' briefs before Supreme Court and Special Master regarding contempt issues in preparation for drafting argument section of post-hearing submission; prepare for examination of R. Bunch.	5.10	2,244.00
11/14/22	Eitan Kagedan	Fulton County: Attend evidentiary hearing on Application for Contempt.	3.50	1,050.00
11/14/22	Eitan Kagedan	Fulton County: Revise partial draft of Post-Hearing submission.	5.70	1,710.00
11/14/22	Maria Hunter	Fulton County: Communications with Court Clerk regarding transcript of October 27, 2022 Status Conference.	0.10	15.00
11/14/22	Maria Hunter	Fulton County: Review of transcript of October 27, 2022 Status Conference.	0.10	15.00
11/14/22	Maria Hunter	Fulton County: Draft correspondence to Court enclosing archival copies of filings.	0.10	15.00
11/14/22	Maria Hunter	Fulton County: Review of Order extending deadline for post-hearing submissions and update matter calendar.	0.30	45.00
11/14/22	Maria Hunter	Fulton County: Review and cite-check of record references in the Secretary's draft proposed findings of fact.	0.80	120.00
11/14/22	Robert Wiygul	Fulton County: Draft outline and prepare for examination of R. Bunch; attend third day of evidentiary hearing.	4.90	2,156.00
11/14/22	Robert Wiygul	Fulton County: Emails with T. Carroll regarding key access log; communications with E. Kagedan regarding same; conduct initial review of draft proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing elements of contempt.	6.70	2,948.00
11/15/22	Eitan Kagedan	Fulton County: Review and revise post-hearing submission and findings of fact.	6.20	1,860.00
11/15/22	Eitan Kagedan	Fulton County: Research on Fifth Amendment protections with respect to responses to document requests and subpoenas in preparation for responding to Petitioners' argument against admission of key access log.	1.00	300.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/15/22	John Hill	Fulton County: Confer with R. Wiygul regarding contempt proceeding in preparation for review of post-hearing submission.	0.20	50.00
11/15/22	John Hill	Fulton County: Review and analyze draft post-hearing submission.	0.50	125.00
11/15/22	Maria Hunter	Fulton County: Review of redacted copy of November 10, 2022 hearing transcript.	0.10	15.00
11/15/22	Maria Hunter	Fulton County: Review, cite-check, and revise references to case law and record in Argument section of post-hearing submission.	1.10	165.00
11/15/22	Maria Hunter	Fulton County: Prepare exhibit in support of the Secretary's post-hearing submission.	0.10	15.00
11/15/22	Robert Wiygul	Fulton County: Additional emails with T. Carroll regarding admission of key access log; review and revise proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing why Petitioners should pay the Secretary's costs and fees, why Petitioners should be required to relinquish custody of the voting machines, and why the Secretary's Exhibit 1 should be admitted into evidence; email to clients transmitting draft of post-hearing submission; communications with E. Kagedan regarding further revisions to post-hearing submission.	9.40	4,136.00
11/16/22	Eitan Kagedan	Fulton County: Finalize post-hearing submission.	0.80	240.00
11/16/22	Eitan Kagedan	Fulton County: Review Petitioners' post-hearing filing.	0.90	270.00
11/16/22	Maria Hunter	Fulton County: Review hearing notes regarding length of cross-examination of expert R. Macias for inclusion in Secretary's post-hearing submission.	0.20	30.00
11/16/22	Robert Wiygul	Fulton County: Revise, supplement by adding introduction, and file post-hearing submission; communications with E. Kagedan and clients regarding same; review Dominion's post-hearing submission and email clients regarding same.	3.50	1,540.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/17/22	Eitan Kagedan	Revise application to admit Key Access Log into evidence.	1.20	360.00
11/17/22	Robert Wiygul	Fulton County: Draft and revise application to admit key access log or for discovery sanctions; communications with E. Kagedan regarding same; review Special Master's order regarding evidentiary issues and email clients regarding same; emails with clients regarding draft application to admit key access log or for discovery sanctions.	3.90	1,716.00
11/18/22	Eitan Kagedan	Fulton County: Review and comment on revised Application to Admit Key Access Log into evidence.	0.70	210.00
11/18/22	John Hill	Fulton County: Review and comment on updated draft of post-hearing submission.	0.30	75.00
11/18/22	Robert Wiygul	Fulton County: Further revise application regarding key access log per M. Fischer's comments and Special Master's Order dated November 17, 2022; email to clients regarding same; finalize and file same; email same to court staff.	1.30	572.00
11/18/22	Robert Wiygul	Fulton County: Review Petitioners' response to application to admit key access log and email clients regarding same; review Order granting application to admit and email clients regarding same.	0.30	132.00
11/18/22	Robert Wiygul	Fulton County: Review Order disposing of applications for discovery sanctions and relief for violations of Special Master's Orders and email clients regarding same.	0.30	132.00
11/18/22	Robert Wiygul	Fulton County: Initial review of Special Master's Report and Recommendations; emails with clients regarding same.	0.80	352.00
11/19/22	Robert Wiygul	Fulton County: Detailed review and analysis of Special Master's Report and Recommendations; emails with clients regarding same.	0.90	396.00
11/20/22	Eitan Kagedan	Fulton County: Review Special Master's Report and Recommendation.	1.10	330.00
11/21/22	Eitan Kagedan	Review and analyze Special Master's Report and Recommendation.	0.90	270.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/22/22	Maria Hunter	Fulton County: Review of Order regarding Application for Discovery Sanctions and update matter calendar regarding submission of supporting documentation.	0.20	30.00
11/22/22	Robert Wiygul	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County and related cases.	--0.50-- 0.20	-220.00- 88.00
11/29/22	Eitan Kagedan	Fulton County: Analyze hearing transcripts to identify portions for use in anticipated Pa. Supreme Court submission.	2.80	840.00



January 26, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40120477

Statement of services rendered and costs incurred through December 31, 2022:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/01/22	Eitan Kagedan	Fulton County: Assess basis for potential criminal referral.	1.00	300.00
12/01/22	Robert Wiygul	Fulton County: Videoconference with OAG attorneys regarding ethical issues involving Petitioners' counsel.	0.70	308.00
12/01/22	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding evidence supporting application for fees.	0.30	132.00
12/04/22	Maria Hunter	Fulton County: Review and analysis of vendor invoices relating to depositions in support of application for fees.	0.50	75.00
12/05/22	Maria Hunter	Fulton County: Review and analysis of Court Reporter invoice and copying invoices for work done for depositions in support of application for fees.	0.30	45.00
12/06/22	Eitan Kagedan	Fulton County: Research requirements for fee application.	0.50	150.00
12/06/22	Maria Hunter	Fulton County: Communications with team regarding preparation of application for fees relating to depositions.	0.50	75.00
12/07/22	Eitan Kagedan	Fulton County: Review and revise draft Affidavits and fee application.	1.10	330.00
12/07/22	Maria Hunter	Fulton County: Review and revise draft M. Hunter Affidavit in Support of Application for deposition-related fees and costs.	0.60	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/07/22	Robert Wiygul	Fulton County: Draft application for award of deposition-related costs and fees and supporting affidavits pursuant to Special Master's November 18 Order; email to T. Gates regarding his draft affidavit; email to clients transmitting draft submission for their review and comments.	6.40	2,816.00
12/07/22	Robert Wiygul	Fulton County: Review Dominion's application for an award of costs and fees; email to clients regarding same.	0.50	220.00
12/08/22	Maria Hunter	Fulton County: Review and update exhibits 1 and 2 to R. Wiygul Affidavit in support of application for deposition-related fees.	0.10	15.00
12/08/22	Maria Hunter	Fulton County: Review correspondence from Court regarding deadline to respond to Dominion Application for Fees and update matter calendar regarding same.	0.10	15.00
12/08/22	Maria Hunter	Fulton County: Prepare redacted version to Exhibit 3 to R. Wiygul Affidavit in support of application for fees.	0.50	75.00
12/08/22	Maria Hunter	Fulton County: Review and cite check R. Wiygul Affidavit in Support of Application for Fees.	0.70	105.00
12/08/22	Maria Hunter	Fulton County: Review, update, finalize and file Application for Fees.	1.80	270.00
12/08/22	Robert Wiygul	Fulton County: Review correspondence from Pa. Supreme Court regarding response to Dominion's application for fees and email clients regarding same.	0.20	88.00
12/08/22	Robert Wiygul	Fulton County: Communications with M. Hunter regarding redactions to invoices to be submitted in support of request for deposition-related fees and finalization of exhibits to fee request; emails to clients regarding fee request; revise and finalize fee requests and supporting exhibits.	1.10	484.00
12/15/22	Eitan Kagedan	Fulton County: Research standards and requirements for fee petitions in preparation for drafting petition to recover all appeal-related fees and costs in accordance with Special Master's Recommendation.	2.00	600.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/15/22	Robert Wiygul	Weekly conference call with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.50 0.20	220.00 88.00
12/19/22	Eitan Kagedan	Fulton County: Check in regarding Dominion application for fees and prepare no answer letter.	0.30	90.00
12/20/22	Robert Wiygul	Fulton County: Revise no-answer letter in response to Dominion's application for fees and email clients regarding same.	0.20	88.00
12/21/22	Robert Wiygul	Fulton County: Communications with clients regarding response to Dominion's application for fees and finalize and file same.	0.20	88.00
12/21/22	Robert Wiygul	Fulton County: Email clients regarding Petitioners' response to Dominion's application for costs and fees.	0.10	44.00
12/22/22	Robert Wiygul	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters; review federal court docket to determine status of Fulton County v. Dominion case.	0.50 0.20	220.00 88.00
12/29/22	Robert Wiygul	Fulton County: Review order awarding the Secretary her deposition-related fees and costs; email clients regarding same.	0.20	88.00

February 26, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40121133

Statement of services rendered and costs incurred through January 31, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/05/23	Robert Wiygul	Attend weekly conference call with clients, OAG, and SUDC regarding the status of the Fulton County case and related cases.	0.40 0.10	176.00 44.00
01/30/23	Robert Wiygul	Review check and cover letter received from Petitioners' counsel regarding award of deposition-related costs and fees; emails with clients regarding same; draft letter to K. Kotula enclosing check.	0.50	220.00
Totals:			<u>1.30</u>	<u>496.00</u>

<u>Timekeeper</u>	<u>Title</u>				<u>Total</u>
Robert Wiygul	Shareholder	.90	hrs at	\$ 440 / hr	396.00
John Hill	Associate	.40	hrs at	\$ 250 / hr	100.00
Total Professional Charges					496.00

<u>Costs:</u>	<u>Description</u>	<u>Amount</u>
85	Messenger/Delivery Service	28.65
Total Costs:		28.65
Total Fee Amount:		496.00
Total Costs:		28.65
Total Current Bill:		524.65
<u>Outstanding Prior Balance</u>		
Invoice No. 40119322, dated 11/22/22		171.18
Invoice No. 40119467, dated 12/08/22		146,093.56
Invoice No. 40120477, dated 01/26/23		8,646.11
Previous Balance Due		221,556.44
Less Payments Received		66,645.59
TOTAL AMOUNT DUE		155,435.50

May 24, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40123061

Statement of services rendered and costs incurred through April 30, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/19/23	Eitan Kagedan	Fulton County: Conduct comprehensive review and analysis of Pa. Supreme Court opinions resolving Secretary's appeal and application for sanctions; identify outstanding issues for potential future briefing; assess implications for case going forward; draft summary of Pa. Supreme Court opinions for clients; communications with clients and HASPS team regarding Supreme Court decision.	3.60	1,080.00
04/19/23	Robert Wiygul	Fulton County: Review Supreme Court opinions awarding sanctions and resolving appeal; communications with team, clients, and counsel for Dominion regarding same.	1.50	660.00
04/20/23	Eitan Kagedan	Fulton County: Review correspondence concerning outstanding issues raised by SCOPA Opinion.	0.10	30.00
04/21/23	Eitan Kagedan	Fulton County: Assemble invoices for fee petition.	0.30	90.00
04/25/23	Eitan Kagedan	Fulton County: Review correspondence from court.	0.10	30.00
04/27/23	Robert Wiygul	Attend weekly conference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.20	88.00
04/28/23	Eitan Kagedan	Fulton County: Develop strategy for drafting fee petition, including review of prior filings and consideration of including Commonwealth attorney time expenditures.	0.70	210.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/28/23	Maria Hunter	Review of Order regarding Motions for Fees and Costs and update matter calendar regarding same.	0.10	15.00
04/28/23	Robert Wiygul	Fulton County: Review Special Master's Order setting deadlines for fee submission and status report regarding expert report; telephone conference with E. Kagedan regarding next steps; email to clients regarding same.	0.40	176.00

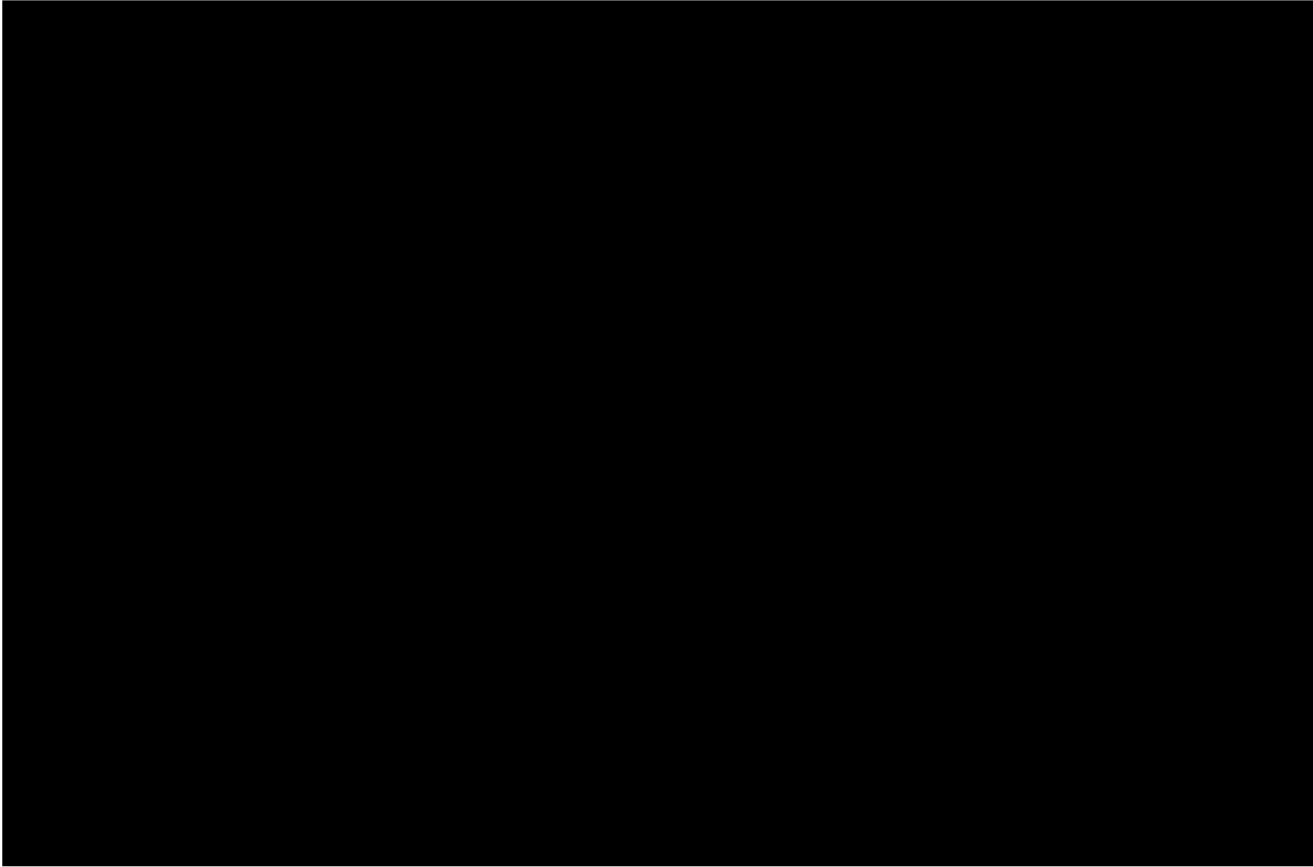


EXHIBIT B

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
12/16/21	Kagedan, Eitan	Fulton: Research to support basis for motion for entry of preservation order.	1.0	300.00
12/16/21	Wiygul, Robert	Draft and revise emergency application for preservation order prohibiting December 22 "examination" of voting equipment by Envoy Sage and communications with team, clients, and OAG regarding same.	9.1	2,866.50
12/17/21	Ferrari, Kim	Review and cite check emergency application for Order re spoliation of evidence; review and analyze key communications and organize exhibits for same; draft potential declaration of M. Hangley; review emails with King; file with Commonwealth court.	6.0	900.00
12/17/21	Hangley, Michele D.	Edits, discussion, finalizing and filing spoliation motion.	3.0	1,320.00
12/17/21	Kagedan, Eitan	Fulton County: Review, revise, and hone strategy regarding Emergency Motion to Preserve Evidence and related communications and prepare same for filing.	4.0	1,200.00
12/17/21	Kagedan, Eitan	Fulton County: Draft and revise Macias Affidavit in support of Emergency Motion regarding Spoliation.	2.2	660.00
12/17/21	Wiygul, Robert	Revise and finalize emergency application to enjoin Envoy Sage inspection and supporting documents and communicate with team, clients, OAG, and R. Macias regarding same.	5.7	1,795.50
12/17/21	Kotula, Kathleen	Review draft emergency application re spoliation	0.3	90.00
12/17/21	Kotula, Kathleen	Review letter from Dominion to Fulton County re proposed inspection	0.2	60.00
12/18/21	Hangley, Michele D.	Review, consider and circulate to team King's comments to press on spoliation motion.	0.5	220.00
12/18/21	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding Envoy Sage "inspection."	0.6	180.00
12/18/21	Wiygul, Robert	Conference with K. Stimson regarding recent developments relating to scheduled inspection of Fulton County's voting equipment.	0.3	94.50
12/18/21	Wiygul, Robert	Communications with team, clients, Dominion's counsel about scheduling order relating to emergency application to enjoin inspection; communications with team, clients, Dominion's counsel, and R. Macias regarding press-reported interview of T. King regarding purpose of inspection.	1.2	378.00
12/20/21	Hangley, Michele D.	Spoliation motion: review response, prepare for argument, discuss strategy.	2.5	1,100.00
12/20/21	Kagedan, Eitan	Fulton County: Review and analyze Opposition to Application for Emergency Relief.	0.5	150.00
12/20/21	Kagedan, Eitan	Fulton County: Research whether an order denying Emergency Motion Regarding Spoliation is subject to immediate appeal.	3.2	960.00
12/20/21	Kagedan, Eitan	Fulton County: Review draft application for leave to submit AP article.	0.3	90.00
12/20/21	Kagedan, Eitan	Fulton County: Meet with Ryan Macias to discuss planned Envoy Sage "inspection" and follow up with Michele Hangley and Rob Wiygul.	2.1	0.00
12/20/21	Wiygul, Robert	Prepare for and conduct call with R. Macias regarding Fulton County emergency application and oral argument (including preparatory call with M. Hangley).	1.0	315.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
12/20/21	Wiygul, Robert	Review and analyze Petitioners' answer to emergency application and communicate with team and clients regarding same; review memorandum by E. Kagedan regarding potential appealability of order denying emergency application; draft application for leave to submit additional exhibit in support of emergency application.	4.9	1,543.50
12/20/21	Wiygul, Robert	Conference with R. Macias regarding Lahr affidavit in support of Petitioners' answer to Emergency Application and conferences with M. Hangley and E. Kagedan regarding strategy for oral argument.	1.2	378.00
12/20/21	Kotula, Kathleen	Review Fulton County's response to emergency application	0.3	90.00
12/20/21	Fischer, Michael	Review Fulton County Filing; correspond with counsel for members of Senate Intergovernmental Operations Committee regarding inspection	0.3	110.00
12/21/21	Hangley, Michele D.	Prepared for, mooted, attended Fulton argument; discussed follow up.	3.0	1,320.00
12/21/21	Kagedan, Eitan	Fulton County: Review argument outline.	0.7	0.00
12/21/21	Kagedan, Eitan	Fulton County: Appear for and follow up regarding oral argument on the Secretary's Emergency Application.	1.8	0.00
12/21/21	Wiygul, Robert	Fulton: Prepare for and participate in telephone argument on emergency application; follow-up conferences with client and team regarding same.	3.7	1,165.50
12/21/21	Wiygul, Robert	Fulton: Draft and revise outline for oral argument on emergency application to enjoin inspection.	3.5	1,102.50
12/21/21	Wiygul, Robert	Fulton: Conference with clients and OAG to prepare for oral argument on emergency application to enjoin inspection.	0.9	283.50
12/21/21	Kotula, Kathleen	Attend meeting re prep for argument on emergency application	0.5	150.00
12/21/21	Fischer, Michael	Participate in teleconference to prepare for argument; review court order	0.8	330.00
12/22/21	Hangley, Michele D.	Strategy and discussions with Dominion and Macias re protocol.	1.5	660.00
12/23/21	Hangley, Michele D.	Received, reviewed Macias draft report re inspection.	0.5	220.00
12/23/21	Wiygul, Robert	Telephone conference with K. Stimson (Dominion) regarding impending inspection of Fulton County voting equipment and Dominion's potential involvement; follow up conference with M. Hangley regarding strategy for negotiating inspection protocol.	0.8	252.00
12/24/21	Hangley, Michele D.	Discussed national press reports with Macias.	0.4	176.00
12/27/21	Hangley, Michele D.	Drafted protocol for Fulton inspection.	3.0	1,320.00
12/28/21	Hangley, Michele D.	Drafted protocol; discussed strategy for Fulton protective order.	2.0	880.00
12/28/21	Kagedan, Eitan	Fulton County: Call with Ryan Macias, Aimee Thomson, Michele Hangley, and Rob Wiygul concerning negotiation of protocol for Envoy Sage Inspection.	0.9	0.00
12/28/21	Kagedan, Eitan	Review and consider impact of correspondence regarding conversation with Dominion's outside counsel.	0.2	60.00
12/28/21	Wiygul, Robert	Conference with R. Macias regarding terms of proposed protocol governing inspection of Fulton voting machines and preparation and follow-up conferences with M. Hangley regarding same.	1.5	472.50

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
12/28/21	Wiygul, Robert	Fulton: Telephone calls and emails with outside counsel for Dominion regarding their potential intervention and follow up communications with M. Hangley and clients regarding same.	1.1	346.50
12/29/21	Hangley, Michele D.	Drafted protocol for Fulton January 10 inspection.	2.7	1,188.00
12/29/21	Hangley, Michele D.	Located and advised on applicability of models for Protective Order.	0.5	220.00
12/29/21	Hangley, Michele D.	Located and advised on applicability of models for Dominion intervention in Fulton County case.	0.5	220.00
12/29/21	Kagedan, Eitan	Fulton County: Review and comment on draft Inspection Protocol.	0.8	240.00
12/29/21	Kagedan, Eitan	Develop approach for and begin drafting Protective Order.	1.4	420.00
12/29/21	Wiygul, Robert	Review and comment on draft inspection protocol and email R. Macias and A. Thomson regarding same.	1.0	315.00
12/30/21	Hangley, Michele D.	Fulton: Protocol and protective order drafting.	1.5	660.00
12/30/21	Kagedan, Eitan	Draft Protective Order and review and comment on draft Protocol regarding Envoy Sage inspection.	3.2	960.00
12/30/21	Wiygul, Robert	Review and comment on draft Fulton inspection protocol and protective order and communications with team and clients regarding same; communications with Dominion's counsel regarding Dominion's possible intervention.	3.6	1,134.00
12/31/21	Hangley, Michele D.	Discussed potential intervention in Fulton County case with Dominion; sent protocol to King.	2.0	880.00
12/31/21	Kagedan, Eitan	Review revisions to draft Fulton protective order in advance of Envoy Sage inspection.	0.5	150.00
12/31/21	Wiygul, Robert	Communications with counsel for Dominion regarding their potential intervention in Fulton County case.	1.0	315.00
12/31/21	Wiygul, Robert	Review and analyze R. Macias's comments on draft protective order and email clients regarding same; revise protective order and emails with R. Macias regarding same.	0.9	283.50
12/31/21	Kotula, Kathleen	Review draft inspection protocol and protective order	0.5	150.00
01/01/22	Wiygul, Robert	Fulton County: Email to clients regarding call with Dominion's counsel regarding possible intervention motion.	0.3	132.00
01/03/22	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding Dominion Motion to Intervene and plan next steps.	0.9	270.00
01/03/22	Wiygul, Robert	Fulton County: Telephone conference with K. Kotula regarding Buchanan's representation of Dominion and conference with E. Kagedan regarding immediate- and medium-term task lists (negotiation of protocol with Fulton County, drafting of potential motion for relief regarding inspection, etc.)	0.6	264.00
01/03/22	Wiygul, Robert	Fulton County: Review and analyze Dominion's motion to intervene and attachments and email clients and Dominion regarding same.	0.9	396.00
01/04/22	Kagedan, Eitan	Fulton County: Review, analyze, and plan response to Fulton County's proposed Inspection Protocol.	1.9	570.00
01/04/22	Kagedan, Eitan	Fulton County: Draft Motion for Entry of Order regarding Inspection Protocol.	1.4	420.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
01/04/22	Kagedan, Eitan	Fulton County: Develop strategy for negotiation of Inspection Protocol and for bringing disputes regarding the same before the court, particularly in light of Dominion's pending Motion to Intervene.	0.6	180.00
01/04/22	Wiygul, Robert	Fulton County: Review proposed inspection protocol and scope of inspection by Petitioners; communications with E. Kagedan, R. Macias, and clients regarding same.	1.4	616.00
01/04/22	Wiygul, Robert	Fulton County: Review order scheduling hearing on Dominion's application and communications with clients, team, and R. Macias regarding same.	0.4	176.00
01/04/22	Wiygul, Robert	Conference with S. Gallagher regarding evidentiary hearing on Dominion's application to intervene; emails to T. King and clients regarding Fulton County's recall of their proposed protocol.	0.6	264.00
01/04/22	Kotula, Kathleen	Review T. King's proposed edits to inspection protocol	0.2	60.00
01/04/22	Fischer, Michael	Review Fulton County's proposed inspection protocol	0.3	110.00
01/05/22	Kagedan, Eitan	Fulton County: Review and revise draft stipulations in advance of hearing on Dominion Motion to Intervene, including checking proposed stipulations against factual record.	1.4	420.00
01/05/22	Kagedan, Eitan	Fulton County: Draft letter to court regarding status of inspection protocol negotiations.	3.0	900.00
01/05/22	Kagedan, Eitan	Fulton County: Research regarding potential interlocutory appeal of adverse order on Dominion motion to intervene.	1.3	390.00
01/05/22	Kagedan, Eitan	Fulton County: Develop strategy and game plan for Dominion Motion to Intervene and inspection protocol negotiations.	1.0	300.00
01/05/22	Wiygul, Robert	Fulton County: Conference with clients regarding intervention hearing and inspection protocol negotiations and follow up conference with E. Kagedan regarding same.	0.7	308.00
01/05/22	Wiygul, Robert	Fulton County: Draft letter to Judge Leavitt seeking postponement of inspection and requirements in inspection protocol.	5.9	2,596.00
01/05/22	Kotula, Kathleen	Attend meeting re Fulton inspection protocol	0.5	150.00
01/05/22	Fischer, Michael	Participate in teleconference regarding inspection protocol	0.5	220.00
01/06/22	Ferrari, Kim	Fulton County: Edit answer; edit letter and exhibits; prepare for hearing.	4.0	600.00
01/06/22	Kagedan, Eitan	Fulton County: Draft, review, revise, and respond to comments on letter to court regarding status of inspection protocol negotiations and answer to Dominion Motion to Intervene.	4.0	1,200.00
01/06/22	Kagedan, Eitan	Fulton County: Research impact of Sunshine Act on court's ability to enjoin public meeting.	0.5	150.00
01/06/22	Wiygul, Robert	Fulton County: Finish drafting letter to Judge Leavitt seeking postponement of inspection and specific protocol terms; revise answer to Dominion's application to intervene.	2.1	924.00
01/06/22	Wiygul, Robert	Fulton County: Communications with team, parties, and clients regarding proposed stipulation of facts; communications with clients and team regarding answer to Dominion's application to intervene and letter to Court regarding status of negotiations over inspection protocol.	1.8	792.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
01/06/22	Kotula, Kathleen	Review draft letter to court regarding negotiation of inspection protocol	0.1	30.00
01/06/22	Kotula, Kathleen	Review T. King's additional proposed edits to inspection protocol	0.2	60.00
01/07/22	Ferrari, Kim	Coordinate logistics of recording Fulton County Inspection; watch hearing in prep for inspection; work on draft of potential King's Bench petition.	2.0	300.00
01/07/22	Kagedan, Eitan	Fulton County: Conduct final preparations for, attend, and conduct post mortem on hearing on Dominion Motion to Intervene and status conference on negotiation of inspection protocol.	4.8	1,440.00
01/07/22	Wiygul, Robert	Fulton County: Prepare for and attend hearing and status conference and follow up communications with team, client, and OAG regarding same.	4.9	2,156.00
01/07/22	Wiygul, Robert	Fulton County: Conference with counsel for Dominion regarding negotiation of protocol.	0.4	176.00
01/07/22	Wiygul, Robert	Fulton County: Conference with clients and OAG regarding strategy following hearing.	0.9	396.00
01/07/22	Wiygul, Robert	Fulton County: Conference with R. Macias regarding case status and draft inspection protocol.	0.8	352.00
01/07/22	Kotula, Kathleen	Attend meeting re Fulton follow-up on hearing re Dominion motion to intervene and conference on inspection protocol	0.5	150.00
01/07/22	Fischer, Michael	Participate in teleconference regarding litigation strategy	1.0	440.00
01/08/22	Kagedan, Eitan	Fulton County: Review and comment on draft inspection protocol and client update and strategy email memo.	1.7	510.00
01/08/22	Wiygul, Robert	Fulton County: Draft inspection protocol and communications with R. Macias and E. Kagedan regarding same; revise same and email clients regarding inspection protocol and related issues; review emails from other parties regarding negotiations.	8.2	3,608.00
01/09/22	Kagedan, Eitan	Fulton County: Conference with all parties regarding negotiation of inspection protocols.	1.3	390.00
01/09/22	Kagedan, Eitan	Fulton County: Follow up regarding conference with all parties regarding negotiation of inspection protocols.	0.8	240.00
01/09/22	Kagedan, Eitan	Fulton County: Review, revise, and comment on drafts of inspection protocol agreement.	1.7	510.00
01/09/22	Kagedan, Eitan	Fulton County: Review, revise, and comment on Emergency Application to Postpone Inspection Based on Expert Availability.	0.5	150.00
01/09/22	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding inspection protocol negotiations.	0.4	120.00
01/09/22	Wiygul, Robert	Fulton County: Draft and revise emergency application to reschedule inspection based on expert's unavailability.	1.6	704.00
01/09/22	Wiygul, Robert	Fulton County: Prepare for and participate in conference with parties regarding inspection protocols and follow-up conferences with E. Kagedan and OAG regarding same; revise summary of conference and email same to clients.	4.2	1,848.00
01/09/22	Wiygul, Robert	Fulton County: Revise proposed inspections protocol and communications with E. Kagedan, R. Macias, and clients regarding same.	2.2	968.00
01/09/22	Kotula, Kathleen	Review new draft inspection protocol from T. King	0.3	90.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
01/09/22	Kotula, Kathleen	Review draft of Secretary's inspection protocol	0.3	90.00
01/10/22	Kagedan, Eitan	Fulton County: Review, comment on, and draft response to Petitioners' proposal.	1.4	420.00
01/10/22	Kagedan, Eitan	Fulton County: Research issues related to viability and procedural requirements for permissive interlocutory appeal.	0.4	120.00
01/10/22	Kagedan, Eitan	Fulton County: Review and develop strategy related to correspondence regarding planned inspection.	1.8	540.00
01/10/22	Wiygul, Robert	Fulton County: Finalize and file emergency application to reschedule inspection based on expert's unavailability and call Prothonotary's Office regarding same; emails to clients regarding same.	0.5	220.00
01/10/22	Wiygul, Robert	Review and analyze revised inspection protocol proposal from Fulton County and communications with R. Macias, E. Kagedan, and clients regarding same.	1.0	440.00
01/10/22	Wiygul, Robert	Fulton County: Begin drafting letter to T. King regarding inspection protocol based on E. Kagedan's draft.	2.3	1,012.00
01/10/22	Kotula, Kathleen	Review Petitioners' revised inspection protocol	0.2	60.00
01/11/22	Ferrari, Kim	Fulton County: Coordinate video for inspection; edit letter and pull exhibits to same.	2.0	300.00
01/11/22	Kagedan, Eitan	Fulton County: Draft Joint Status Report regarding status of negotiations and develop strategy regarding same.	1.5	450.00
01/11/22	Kagedan, Eitan	Fulton County: Review and revise letter to Tom King regarding inspection protocol negotiations.	3.0	900.00
01/11/22	Wiygul, Robert	Fulton County: Finish drafting letter to T. King regarding inspection protocol and email clients regarding same.	2.5	1,100.00
01/11/22	Wiygul, Robert	Conferences with clients, OAG, and SUDC regarding coordinating strategy in Fulton County and IOC subpoena cases.	1.4	616.00
01/11/22	Wiygul, Robert	Fulton County: Begin drafting Respondent's portion of joint status report.	2.0	880.00
01/11/22	Wiygul, Robert	Fulton County: Revise letter to T. King regarding inspection protocols and communicate with clients, OAG, and R. Macias regarding same.	1.3	572.00
01/11/22	Kotula, Kathleen	Review draft letter to T. King re latest protocol proposal (1/10/22)	0.2	60.00
01/12/22	Kagedan, Eitan	Fulton County: Draft sections of Renewed Emergency Application to Prohibit Inspection.	2.2	660.00
01/12/22	Kagedan, Eitan	Fulton County: Review letter from Tom King regarding inspection protocol negotiations.	0.1	30.00
01/12/22	Wiygul, Robert	Conferences with clients, SUDC, and OAG regarding IOC subpoena and Fulton County cases.	0.7	308.00
01/12/22	Wiygul, Robert	Fulton County: Develop E. Kagedan's draft of renewed emergency application to prohibit inspection.	0.6	264.00
01/12/22	Boyer, Jacob	Review and edit Renewed Emergency Application to Prohibit Inspection and meetings about the same.	1.0	300.00
01/12/22	Kotula, Kathleen	Review response letter from T. King	0.1	30.00
01/12/22	Fischer, Michael	Call with R. Wiygul regarding litigation	0.3	110.00
01/13/22	Ferrari, Kim	Fulton County: Review status and coordinate details of video for inspection; prepare for inspection and work with R Wiygul; edit renewed emergency application and organize exhibits to same; redact cell phone numbers; cite check same.	4.0	600.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
01/13/22	Kagedan, Eitan	Fulton County: Draft Petition for Writ of Mandamus or Extraordinary Jurisdiction in anticipation of Commonwealth Court's not issuing an order prior to inspection.	3.9	1,170.00
01/13/22	Kagedan, Eitan	Fulton County: Draft, revise, and negotiate Joint Status Report.	1.1	330.00
01/13/22	Kagedan, Eitan	Fulton County: Conduct Meet and Confer with counsel for Fulton County regarding negotiation of inspection protocols.	0.2	60.00
01/13/22	Kagedan, Eitan	Fulton County: Review correspondence from Matt Haverstick.	0.1	30.00
01/13/22	Kagedan, Eitan	Fulton County: Review and revise Emergency Application.	2.2	660.00
01/13/22	Wiygul, Robert	Fulton County: Finish drafting and revise renewed emergency application for relief regarding inspection and Secretary's portion of joint status report and conference with clients and E. Kagedan regarding same.	6.3	2,772.00
01/13/22	Wiygul, Robert	Prepare for potential hearing before Judge Leavitt regarding Secretary's emergency applications for relief and the status of the parties' negotiations (including travel from Philadelphia to Fulton County to attend potential inspection).	4.5	1,980.00
01/13/22	Kotula, Kathleen	Review draft renewed emergency application to enjoin inspection	0.3	90.00
01/13/22	Kotula, Kathleen	Review Petitioners' response to renewed emergency application	0.2	60.00
01/14/22	Ferrari, Kim	Fulton County: Prepare for inspection and file emergency application to stay with SCOPA; travel to inspection and attend same.	8.0	1,200.00
01/14/22	Hunter, Maria	Fulton County: Research docket report to be included as exhibit to Notice of Appeal.	0.1	15.00
01/14/22	Hunter, Maria	Fulton County: Review and update Notice of Appeal.	0.2	30.00
01/14/22	Hunter, Maria	Fulton County: Review and update exhibits to Notice of Appeal and Jurisdictional Statement.	0.3	45.00
01/14/22	Kagedan, Eitan	Fulton County: Draft filings and manage tasks related to emergency application for stay to Pennsylvania Supreme Court, including jurisdictional statement and notice of appeal.	5.9	1,770.00
01/14/22	Wiygul, Robert	Fulton County: Prepare for potential hearing before Judge Leavitt on status of parties' negotiations; review and conference with clients and team regarding order denying emergency applications to prevent inspection from going forward; draft appeal papers and emergency application seeking stay from Pa. Supreme Court.	4.8	2,112.00
01/14/22	Wiygul, Robert	Attend public meeting in Fulton County; conferences with Pa. Supreme Court clerks and clients regarding order staying inspection; conference with R. Macias and Dominion's representatives about Fulton County proceedings (including return travel from Fulton County to Philadelphia)	4.7	2,068.00
01/14/22	Boyer, Jacob	Review and edit emergency application to stay.	0.5	150.00
01/14/22	Kotula, Kathleen	Review court order and memorandum opinion denying anti-spoliation application	0.3	90.00
01/14/22	Kotula, Kathleen	Review draft SCOPA stay application	0.3	90.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
01/16/22	Wiygul, Robert	Fulton County: telephone conferences with E. Kagedan regarding strategy for Supreme Court filings and related research tasks.	1.4	616.00
01/17/22	Ferrari, Kim	Fulton County: Draft letter to court regarding appeal and send check for filing fee;	1.0	150.00
01/17/22	Kagedan, Eitan	Fulton County: Draft application and petition for permissive interlocutory review.	4.6	1,380.00
01/17/22	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding case status and Supreme Court's stay of inspection.	0.2	88.00
01/17/22	Wiygul, Robert	Fulton County: Telephone conference with K. Stimson regarding recent developments.	0.1	44.00
01/18/22	Ferrari, Kim	Fulton County: Draft letter to court regarding appeal filed; coordinate payment of appeal fees.	1.0	150.00
01/18/22	Kagedan, Eitan	Fulton County: Review and develop response to Petitioners' Response to Emergency Application for Stay.	0.9	270.00
01/18/22	Kagedan, Eitan	Fulton County: Revise and consider strategy regarding Motion for Permissive Interlocutory Appeal.	2.1	630.00
01/18/22	Kagedan, Eitan	Fulton County: Review, comment on, and draft sections of, Reply in Support of Emergency Stay.	1.9	570.00
01/18/22	Wiygul, Robert	Conference with clients, OAG, and SUDC regarding IOC subpoena and Fulton County cases.	0.3	132.00
01/18/22	Wiygul, Robert	Fulton County: Draft reply in support of SCOPA application for stay pending appeal.	6.8	2,992.00
01/18/22	Kotula, Kathleen	Review Petitioners' answer to emergency application for stay of inspection (SCOPA)	0.2	60.00
01/19/22	Ferrari, Kim	Fulton County: Cite check and edit reply brief; gather key exhibits to same and file with SCOPA.	3.0	450.00
01/19/22	Kagedan, Eitan	Fulton County: Draft Response to Democratic Senators' Application to Participate.	0.4	120.00
01/19/22	Kagedan, Eitan	Fulton County: Draft, revise, and finalize Reply in support of SCOPA Emergency Application for Stay.	3.0	900.00
01/19/22	Kagedan, Eitan	Fulton County: Review filings ancillary to Emergency Application for Stay.	0.5	150.00
01/19/22	Wiygul, Robert	Fulton County: Finish drafting, revise, and file reply in support of SCOPA application for stay pending appeal; communications with team and clients regarding same.	7.6	3,344.00
01/19/22	Kotula, Kathleen	Review draft reply ISO application for stay (SCOPA)	0.2	60.00
01/19/22	Fischer, Michael	Review and edit reply brief in support of application for stay pending appeal	0.8	330.00
01/20/22	Ferrari, Kim	Fulton County: Edit, finalize and file with PAC File the application regarding amicus filing of IOC Democratic Senators.	1.0	150.00
01/20/22	Wiygul, Robert	Conference with clients and SUDC regarding status of and outlook for Fulton County case and IOC subpoena case.	0.2	88.00
01/20/22	Wiygul, Robert	Fulton County: Review and revise response to Democrat Senators' amicus brief and communications with client regarding same; review order regarding response to Dominion's Jurisdictional Statement and communications with client regarding same.	0.8	352.00
01/21/22	Ferrari, Kim	Fulton County: Draft no answer letter and file same.	0.5	75.00
01/22/22	Wiygul, Robert	Fulton County: Review and analyze proposed amicus brief by Senators Corman and Dush and email clients and OAG regarding same.	0.9	396.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
01/23/22	Kagedan, Eitan	Fulton County: Review and analyze Corman/Dush Amicus Brief.	0.8	240.00
01/24/22	Kagedan, Eitan	Fulton County: Draft Response to Dush and Corman Amicus Application.	3.2	960.00
01/24/22	Wiygul, Robert	Fulton County: Review order regarding response to Senators' application for leave to file amicus brief and communicate with clients regarding same; communicate with E. Kagedan regarding draft response; review draft response.	0.7	308.00
01/25/22	Ferrari, Kim	Fulton County: Edit response to Dush application and submit same to court.	1.0	150.00
01/25/22	Kagedan, Eitan	Fulton County: Revise and finalize Opposition to Dush/Corman Amicus filing.	1.5	450.00
01/25/22	Wiygul, Robert	Fulton County: Revise response to application for leave to file amicus brief by Senators Dush and Corman.	2.7	1,188.00
01/25/22	Fischer, Michael	Review and edit response to amicus brief submitted by Senators Dush & Corman	1.3	550.00
01/26/22	Kagedan, Eitan	Fulton County: Review court notices regarding appeal status.	0.2	60.00
01/27/22	Kagedan, Eitan	Fulton County: Review and circulate Orders.	0.2	60.00
02/02/22	Kagedan, Eitan	Fulton County: Draft preliminary sections of Opening SCOPA Brief.	1.0	300.00
02/05/22	Wiygul, Robert	Fulton County: Begin drafting opening appellate brief.	2.4	1,056.00
02/06/22	Wiygul, Robert	Fulton County: Continue drafting opening appellate brief.	2.2	968.00
02/10/22	Hunter, Maria	Fulton County: Review and identify pleadings in Commonwealth Court matter and start drafting Reproduced Record for SCOPA appeal.	4.2	630.00
02/11/22	Hunter, Maria	Fulton County: Review of Supreme Court and Commonwealth Court filings and continue identifying materials for inclusion in Reproduced Record.	4.7	705.00
02/13/22	Hunter, Maria	Fulton County: Continued review of pleadings and filings and identification of materials for inclusion in Reproduced Record.	1.3	195.00
02/14/22	Hunter, Maria	Fulton County: Review and update materials for potential inclusion in Reproduced Record.	1.2	180.00
02/14/22	Wiygul, Robert	Fulton County: Continue drafting opening appellate brief.	2.6	1,144.00
02/14/22	Wiygul, Robert	Fulton County: Review and comment on draft Reproduced Record.	0.6	264.00
02/15/22	Arteaga, Alexandra	Fulton County: Prepare two No Answer letters.	1.0	150.00
02/15/22	Hunter, Maria	Fulton County: Review and update Reproduced Record and Table of Contents to Reproduced Record.	6.6	990.00
02/15/22	Wiygul, Robert	Conference with OAG and clients regarding pending matters, including IOC subpoena case and Fulton County.	0.2	88.00
02/15/22	Wiygul, Robert	Fulton County: Finish drafting opening appellate brief.	6.3	2,772.00
02/15/22	Wiygul, Robert	Fulton County: Review draft reproduced record and email M. Hunter regarding same; continue drafting appellate brief.	4.1	1,804.00
02/15/22	Kotula, Kathleen	Review draft SCOPA brief	0.5	150.00
02/16/22	Ferrari, Kim	Fulton County: Cite check and edit brief of appellant; finalize reproduced records and file with PAC File.	7.0	1,050.00
02/16/22	Hill, John	Fulton County: Revise appellate brief.	1.3	325.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
02/16/22	Hunter, Maria	Fulton County: Review, update, and number Reproduced Record and Table of Contents to Reproduced Record.	1.2	180.00
02/16/22	Wiygul, Robert	Fulton County: Revise, finalize, and file initial appellate brief.	6.1	2,684.00
03/03/22	Kagedan, Eitan	Fulton County: Review and analyze Opening Appellate brief in preparation for drafting Reply Brief.	0.9	270.00
03/09/22	Kagedan, Eitan	Fulton County: Analyze Petitioners' SCOPA Response brief.	1.0	300.00
03/09/22	Kagedan, Eitan	Fulton County: Review Dominion appellate briefing.	0.7	210.00
03/10/22	Kotula, Kathleen	Review Fulton County's answering brief (SCOPA)	0.3	90.00
03/11/22	Kagedan, Eitan	Fulton County: Research standard for prerogative appellate jurisdiction.	1.4	420.00
03/11/22	Kagedan, Eitan	Fulton County: Identify key points for SCOPA Reply brief, including review of Dominion appellate briefing and research regarding the presumption of validity afforded to administrative action.	4.1	1,230.00
03/11/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' answering brief in Supreme Court appeal; conference with E. Kagedan regarding strategy for reply brief.	0.9	396.00
03/14/22	Kagedan, Eitan	Fulton County: Draft outline of procedure and standards for permissive interlocutory appeal and prerogative interlocutory appeal.	1.6	480.00
03/16/22	Wiygul, Robert	Fulton County: Begin drafting SCOPA reply brief.	2.4	1,056.00
03/17/22	Wiygul, Robert	Fulton County: Continue drafting SCOPA reply brief.	4.7	2,068.00
03/18/22	Kagedan, Eitan	Fulton County: Review and revise SCOPA Reply brief.	1.6	480.00
03/18/22	Wiygul, Robert	Fulton County: Finish drafting SCOPA reply brief; revise same and email clients regarding same.	6.0	2,640.00
03/18/22	Kotula, Kathleen	Review draft SCOPA reply brief	0.2	60.00
03/20/22	Kagedan, Eitan	Fulton County: Revise and discuss SCOPA Reply brief.	1.5	450.00
03/20/22	Wiygul, Robert	Fulton County: Review and analyze comments on SCOPA reply brief by OAG and E. Kagedan; emails and conference with E. Kagedan regarding revisions to same.	1.8	792.00
03/21/22	Arteaga, Alexandra	Fulton County: Review and analyze Reply Appellate Brief, check legal citations and quotations, and prepare tables of citations.	4.5	675.00
03/21/22	Kagedan, Eitan	Fulton County: Revise, finalize and manage filing of SCOPA Reply Brief.	2.8	840.00
03/21/22	Wiygul, Robert	Fulton County: Communications with E. Kagedan regarding client's comments on SCOPA reply brief and finalization of same.	0.3	132.00
03/23/22	Kagedan, Eitan	Fulton County: Review and revise letter to court with archival copy of SCOPA Reply brief.	0.2	60.00
04/19/22	Kagedan, Eitan	Fulton County: Review docket to confirm details surrounding Tom King's withdrawal of appearance.	0.2	60.00
04/19/22	Wiygul, Robert	Fulton County: Review praecipe to withdraw appearance of T. King's firm; emails with OAG regarding Fulton County meeting minutes indicating substitution of counsel; research Fulton County's presumptive new counsel (Lambert and Carroll), including federal court opinion sanctioning Lambert; email clients regarding same.	1.2	528.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
04/19/22	Fischer, Michael	Review Fulton County Commissioners meeting minutes; research background of new counsel for Fulton County	0.5	220.00
04/21/22	Wiygul, Robert	Conference with clients, OAG, and SUDC regarding Fulton County's new counsel, Senator Dush's Right to Know requests, and related matters.	0.2	88.00
05/05/22	Wiygul, Robert	Weekly telephone conference with clients, OAG, and SUDC regarding proceedings against S. Lambert in Michigan and developments in related cases.	0.2	88.00
05/17/22	Wiygul, Robert	Fulton County: Review SCOPA order directing oral argument and email clients regarding same.	0.2	88.00
05/24/22	Wiygul, Robert	Fulton County: Prepare for and conference with clients regarding SCOPA briefing order and Commonwealth Court decision overruling preliminary objection.	0.2	88.00
06/09/22	Wiygul, Robert	Fulton County: Draft supplemental brief addressing appellate jurisdiction.	3.9	1,716.00
06/10/22	Wiygul, Robert	Fulton County: Continue drafting supplemental brief addressing appellate jurisdiction.	7.0	3,080.00
06/11/22	Wiygul, Robert	Fulton County: Finish drafting supplemental brief addressing appellate jurisdiction; emails to clients and team regarding same.	1.9	836.00
06/12/22	Kotula, Kathleen	Review draft of supplemental SCOPA brief addressing SCOPA jurisdiction	0.3	90.00
06/13/22	Kagedan, Eitan	Fulton County: Review draft Supplemental Appellate Brief.	1.1	330.00
06/14/22	Hill, John	Fulton County: Implement client's revisions to supplemental brief regarding Supreme Court's jurisdiction.	0.9	225.00
06/14/22	Kagedan, Eitan	Fulton County: Review edits to Supplemental brief.	0.4	120.00
06/15/22	Arteaga, Alexandra	Fulton County: Review, analyze, and cite check SCOPA brief addressing appellate jurisdiction and prepare tale of authorities for attorney review.	2.6	390.00
06/15/22	Hill, John	Fulton County: Revise supplemental appellate brief.	0.6	150.00
06/16/22	Hill, John	Fulton County: Implement R. Wiygul's revisions to supplemental appellate brief.	0.6	150.00
06/16/22	Kagedan, Eitan	Fulton County: Finalize and manage filing of supplemental brief.	0.3	90.00
06/16/22	Wiygul, Robert	Fulton County: Finalize supplemental brief addressing appellate jurisdiction.	1.1	484.00
06/21/22	Arteaga, Alexandra	Fulton County: Review for filing today Brief addressing Appellate Jurisdiction with original signatures.	0.8	120.00
06/21/22	Kagedan, Eitan	Fulton County: Prepare corrected filing of supplemental brief.	0.7	210.00
06/28/22	Wiygul, Robert	Fulton County: Review entry of appearance by T. Carroll for Petitioners and emails with clients and A. Thompson regarding same.	0.3	132.00
06/30/22	Wiygul, Robert	Attend weekly conference with clients, OAG, SUDC, and J. Matz to discuss status of Fulton County case and related election-law proceedings.	0.1	44.00
07/05/22	Arteaga, Alexandra	Fulton County: Review and analyze docket report and circulate court imposed deadlines.	0.2	30.00
07/05/22	Wiygul, Robert	Fulton County: Review oral argument notice from SCOPA and email clients regarding same.	0.2	88.00
07/07/22	Wiygul, Robert	Weekly conference call with clients, OAG, SUDC, and J. Matz regarding status of Fulton County case and related election-law developments.	0.1	44.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
07/15/22	Arteaga, Alexandra	Fulton County: Review and finalize for filing Acknowledgement of Argument Notice and circulate arguments dates internally.	0.7	105.00
07/15/22	Wiygul, Robert	Fulton County: Review supplemental disclosure statement by Justice Brobson and email clients regarding same.	0.3	132.00
07/20/22	Arteaga, Alexandra	Fulton County: Review and analyze docket report and circulate court imposed deadlines for attorney review.	0.3	45.00
07/20/22	Wiygul, Robert	Fulton County: Review letter from Prothonotary regarding appellees' overdue supplemental brief; email to clients regarding same.	0.3	132.00
07/21/22	Wiygul, Robert	Participate in weekly conference call with clients, OAG, and SUDC regarding Fulton County case and other matters.	0.1	44.00
07/21/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding case status, discovery strategy, and oral argument strategy.	0.3	132.00
07/26/22	Wiygul, Robert	Fulton County: Review letter to Petitioners' counsel from Prothonotary and email clients regarding same.	0.3	132.00
07/26/22	Kotula, Kathleen	Review SCOPA correspondence re: Petitioner's failure to comply with notice to file supplemental brief	0.1	30.00
07/27/22	Wiygul, Robert	Fulton County: Email clients regarding recent filings and response to Petitioners' nunc pro tunc application for extension of time to file supplemental brief; conference with J. Hill regarding same.	0.4	176.00
07/27/22	Kotula, Kathleen	Review Petitioners' application nunc pro tunc for additional time to file supplemental brief	0.1	30.00
07/28/22	Arteaga, Alexandra	Fulton County: Review and analyze court imposed deadlines and circulate updates record for attorney review.	0.3	45.00
07/28/22	Hill, John	Weekly conference with clients and election team co-counsel for update and strategy call regarding Fulton County case and other matters; follow-up conference with R. Wiygul regarding next steps.	0.1	44.00
07/28/22	Wiygul, Robert	Fulton County: Revise letter to Prothonotary responding to Petitioners' nunc pro tunc motion for extension of time to file supplemental appellate brief; email to clients regarding same.	0.2	88.00
07/28/22	Wiygul, Robert	Participate in weekly call with clients, OAG, SUDC, and J. Matz regarding Fulton County case and related matters; follow up call with J. Hill regarding next steps.	0.2	88.00
07/29/22	Arteaga, Alexandra	Fulton County: Review and finalize No Answer Letter to Motion Nunc Pro Tunc for Leave to File Appellees' Supplemental Brief.	0.3	45.00
07/29/22	Kotula, Kathleen	Review draft no answer letter to Petitioners' application	0.1	30.00
08/10/22	Wiygul, Robert	Fulton County: Review letter from SCOPA Prothonotary to counsel for Petitioners; email to clients regarding same.	0.3	132.00
08/10/22	Kotula, Kathleen	Review SCOPA letter to Petitioners' counsel	0.1	30.00
08/22/22	Wiygul, Robert	Fulton County: Telephone conference with B. Minner (Court Crier) regarding Supreme Court oral argument.	0.1	44.00
08/23/22	Wiygul, Robert	Fulton County: Review file and email A. Arteaga regarding creation of binder in preparation for oral argument.	1.1	484.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
08/24/22	Arteaga, Alexandra	Fulton County: Review and analyze materials for attorney review in preparation of upcoming oral argument.	0.4	60.00
09/01/22	Kagedan, Eitan	Fulton County: Plan and prepare for oral argument, including identification of key projects in advance of argument.	0.5	150.00
09/01/22	Kagedan, Eitan	Fulton County: Research caselaw supporting agency enjoining unauthorized conduct.	0.3	90.00
09/02/22	Kagedan, Eitan	Fulton County: Research issues related to forfeiture of argument on appeal.	0.5	150.00
09/02/22	Wiygul, Robert	Fulton County: Emails with team and client regarding moot of oral argument; begin examining briefing in preparation for moot.	0.5	220.00
09/05/22	Aronchick, Mark A.	Fulton County: Reviewing briefs in preparation for moot court.	3.5	1,540.00
09/06/22	Aronchick, Mark A.	Fulton County: Continuing preparation for moot court.	1.3	572.00
09/07/22	Aronchick, Mark A.	Fulton County: Reading through briefs for meeting with R. Wiygul.	1.0	440.00
09/07/22	Arteaga, Alexandra	Fulton County: Review, analyze, and identify caselaw cited in briefing and prepare report for attorney review in preparation for oral argument.	1.5	225.00
09/07/22	Kagedan, Eitan	Fulton County: Review Commonwealth Court and Supreme Court briefing to prepare key case binder and develop questions for moot to assist in preparation for oral argument.	3.5	1,050.00
09/08/22	Aronchick, Mark A.	Fulton County: Preparation for and moot court of R. Wiygul.	0.3	132.00
09/08/22	Arteaga, Alexandra	Fulton County: Review, identify, and gather case law cited in briefing, as well as statutes and rules in preparation for upcoming oral argument.	0.8	120.00
09/08/22	Kagedan, Eitan	Fulton County: Prepare for oral argument.	0.7	210.00
09/09/22	Hill, John	Fulton County: Attend oral argument moot.	1.2	300.00
09/09/22	Kagedan, Eitan	Fulton County: Prepare for and participate in moot.	1.4	420.00
09/09/22	Wiygul, Robert	Fulton County: Prepare for and conduct moot of Supreme Court oral argument.	3.9	1,716.00
09/09/22	Boyer, Jacob	Participate in moot of R. Wiygul for argument in Supreme Court.	1.5	450.00
09/09/22	Kotula, Kathleen	Participate in moot for SCOPA Fulton argument	1.5	450.00
09/09/22	Fischer, Michael	Participate in oral argument moot	1.0	440.00
09/12/22	Kagedan, Eitan	Fulton County: Review Motion to Continue Oral Argument and related communications.	0.2	60.00
09/13/22	Arteaga, Alexandra	Fulton County: Review correspondence received by the court in connection with oral argument scheduled for 10/26	0.2	30.00
09/19/22	Arteaga, Alexandra	Fulton County: Review oral-argument counsel designations for RAW and submit to the court ahead of the 10/26 oral argument.	0.4	60.00
09/21/22	Kagedan, Eitan	Fulton County: Review materials related to Speckin Inspection.	0.8	240.00
09/21/22	Kagedan, Eitan	Fulton County: Conduct research in support of agency's right to prospective injunctive relief.	0.3	90.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
09/21/22	Wiygul, Robert	Fulton County: Review Fulton County's complaint against Dominion and accompanying Speckin Forensics report; telephone conference with S. Gallagher (Dominion's counsel) regarding same.	0.9	396.00
09/23/22	Kagedan, Eitan	Fulton County: Confer with Ryan Macias regarding Speckin inspection.	0.5	150.00
09/23/22	Kagedan, Eitan	Fulton County: Confer with R. Wiygul regarding response to Speckin inspection.	0.6	180.00
09/23/22	Kagedan, Eitan	Fulton County: Confer with client team regarding response to Speckin inspection.	0.5	150.00
09/23/22	Wiygul, Robert	Conferences with R. Macias and clients regarding Fulton County's complaint against Dominion and related third-party inspection; telephone conference with E. Kagedan regarding next steps.	2.3	1,012.00
09/23/22	Kotula, Kathleen	Attend meeting re Fulton follow-up on Speckin inspection	0.5	150.00
09/24/22	Mascioli, Gianni	Fulton County: Call R. Wiygul to discuss research needed for potential contempt motion.	0.4	100.00
09/24/22	Mascioli, Gianni	Fulton County: Call R. Wiygul to discuss next steps and assistance needed with contempt motion.	0.4	100.00
09/26/22	Mascioli, Gianni	Fulton County: Research potential claims against opposing party in connection with potential contempt order.	0.8	200.00
09/26/22	Wiygul, Robert	Fulton County: Telephone conference with B. DeLone and S. Kirkpatrick regarding response to third-party inspection of voting machines; email to T. Gates regarding same.	0.4	176.00
09/27/22	Mascioli, Gianni	Fulton County: Research law governing civil contempt in Pennsylvania.	2.4	600.00
09/27/22	Mascioli, Gianni	Fulton County: Research law governing spoliation of evidence in Pennsylvania for potential contempt motion.	2.3	575.00
09/28/22	Kagedan, Eitan	Fulton County: Review research from Gianni Mascioli on standards for contempt and sanctions related to Speckin inspection in anticipation of drafting contempt motion.	0.9	270.00
09/28/22	Kagedan, Eitan	Fulton County: Draft Motion for Contempt.	1.2	360.00
09/28/22	Mascioli, Gianni	Fulton County: Draft memo to E. Kagedan and R. Wiygul summarizing research on civil contempt and spoliation of evidence.	1.8	450.00
09/28/22	Mascioli, Gianni	Fulton County: Call E. Kagedan to discuss additional research needed for contempt motion.	0.2	50.00
09/28/22	Mascioli, Gianni	Fulton County: Research compensatory remedies for civil contempt.	1.2	300.00
09/28/22	Mascioli, Gianni	Fulton County: Research remedies for litigation misconduct.	1.2	300.00
09/28/22	Mascioli, Gianni	Fulton County: Research authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.2	300.00
09/28/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding contempt application.	0.4	176.00
09/29/22	Kagedan, Eitan	Fulton County: Draft Motion for Contempt.	6.1	1,830.00
09/29/22	Kagedan, Eitan	Fulton County: Review research findings in support of Motion for Contempt.	0.5	150.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
09/29/22	Mascioli, Gianni	Fulton County: Continue researching authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.4	350.00
09/29/22	Mascioli, Gianni	Fulton County: Research Pennsylvania statutory and case law on available sanctions for preservation order violations.	1.7	425.00
09/29/22	Mascioli, Gianni	Fulton County: Prepare supplemental memo to E. Kagedan summarizing additional research on litigation misconduct and available sanctions therefor.	1.7	425.00
09/29/22	Mascioli, Gianni	Fulton County: Correspond further with E. Kagedan to elaborate on additional research in support of contempt motion.	0.3	75.00
09/30/22	Kagedan, Eitan	Fulton County: Complete and revise draft Motion for Contempt.	5.6	1,680.00
10/04/22	Kagedan, Eitan	Fulton County: Research to support executive agency's entitlement to prospective injunctive relief for Supreme Court oral argument.	1.3	390.00
10/06/22	Kagedan, Eitan	Fulton County: Reframe argument section of Motion for Contempt and Sanctions.	5.2	1,560.00
10/06/22	Mascioli, Gianni	Fulton County: Complete supplemental research on Pennsylvania courts' inherent authority to sanction violations of procedural and discovery orders to include in motion for contempt and sanctions.	1.3	325.00
10/06/22	Mascioli, Gianni	Fulton County: Draft section of motion for sanctions regarding Pennsylvania courts' inherent authority to sanction a party with dismissal with prejudice.	1.6	400.00
10/06/22	Mascioli, Gianni	Fulton County: Revise and line-edit introduction and contempt-related sections of draft motion for sanctions.	2.2	550.00
10/06/22	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher regarding Petitioners' Fulton County complaint against Dominion.	0.5	220.00
10/06/22	Wiygul, Robert	Fulton County: Telephone conference with Court Crier regarding upcoming oral argument; revise application to hold Petitioners in contempt.	0.8	352.00
10/07/22	Kagedan, Eitan	Fulton County: Draft Affidavit of Ryan Macias in support of Motion for Contempt.	1.2	360.00
10/07/22	Wiygul, Robert	Fulton County: Review draft of sanctions motion; research case law cited in same and additional case law regarding contempt and other authorities for sanctions; begin revising and supplementing contempt motion.	5.3	2,332.00
10/08/22	Wiygul, Robert	Fulton County: Continue revising and supplementing application to hold Petitioners in contempt.	13.8	6,072.00
10/09/22	Wiygul, Robert	Fulton County: Finish supplementing and revising motion for contempt and sanctions.	10.4	4,576.00
10/10/22	Wiygul, Robert	Fulton County: Further revise contempt application and email clients transmitting same.	0.6	264.00
10/12/22	Kagedan, Eitan	Fulton County: Review edits to Motion for Contempt and Sanctions.	0.7	210.00
10/12/22	Kagedan, Eitan	Fulton County: Consider additions and revisions to Motion for Contempt.	0.2	60.00
10/13/22	Kagedan, Eitan	Fulton County: Revise Macias declaration in support of Motion for Contempt.	1.2	360.00
10/13/22	Wiygul, Robert	Attend weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.2	88.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
10/13/22	Boyer, Jacob	Attend weekly conference, which included discussion of Fulton County case and related matters.	0.2	60.00
10/13/22	Mullen, Kathleen	Review and edit contempt application	1.5	450.00
10/14/22	Kagedan, Eitan	Fulton County: Review proposed edits and comments on Motion for Contempt.	0.4	120.00
10/14/22	Kotula, Kathleen	Review draft contempt application	0.5	150.00
10/15/22	Boyer, Jacob	Review and edit application to hold Petitioners in contempt	2.0	600.00
10/16/22	Wiygul, Robert	Fulton County: Revise application to hold Petitioners in contempt and support affidavit of R. Macias; email to R. Macias regarding same; draft verification of application.	4.3	1,892.00
10/17/22	Arteaga, Alexandra	Fulton County: Gather and review exhibits for Macias Affidavit in support of Motion for Contempt.	0.6	90.00
10/17/22	Wiygul, Robert	Fulton County: Review R. Macias's edits to affidavit in support of contempt application; videoconference with R. Macias regarding same; propose further revisions to affidavit and emails with R. Macias regarding same; emails with A. Arteaga regarding finalizing contempt motion for filing.	2.1	924.00
10/17/22	Kotula, Kathleen	Review expert affidavit in support of contempt application	0.4	120.00
10/18/22	Arteaga, Alexandra	Fulton County: Review and revise exhibits re Motion for Sanctions.	0.5	75.00
10/18/22	Arteaga, Alexandra	Fulton County: Review and finalize for filing Motion for Sanctions and supporting exhibits.	0.9	135.00
10/18/22	Arteaga, Alexandra	Fulton County: Review and finalize verification re Motion for Sanctions.	0.2	30.00
10/18/22	Wiygul, Robert	Fulton County: Revise and finalize contempt application; communications with clients and A. Arteaga regarding same.	3.1	1,364.00
10/18/22	Mullen, Kathleen	Review affidavit in support of contempt application	0.2	60.00
10/19/22	Kagedan, Eitan	Fulton County: Research on preemptive injunctive relief in preparation for Supreme Court oral argument.	0.7	210.00
10/20/22	Aronchick, Mark A.	Fulton County: Review previous filings in connection with possibly mooted next week's argument.	0.8	352.00
10/20/22	Kagedan, Eitan	Fulton County: Review Petitioners' submission in response to Application for Contempt.	0.2	60.00
10/20/22	Kagedan, Eitan	Fulton County: Prepare for Oral Argument on Appeal.	0.6	180.00
10/20/22	Kotula, Kathleen	Review Petitioners' application for relief for extension of time	0.2	60.00
10/20/22	Kotula, Kathleen	Review SCOPA order denying application for extension of time	0.1	30.00
10/21/22	Aronchick, Mark A.	Fulton County: Continued review of filings in connection with possibly mooted next week.	0.6	264.00
10/21/22	Kagedan, Eitan	Fulton County: Prepare for Oral Argument.	0.6	180.00
10/21/22	Kotula, Kathleen	Review SCOPA order designating P.J. Cohn Jubelirer as Special Master	0.1	30.00
10/21/22	Kotula, Kathleen	Review SCOPA order directing that appeal be submitted on briefs	0.1	30.00
10/24/22	Kagedan, Eitan	Fulton County: Develop discovery strategy for Motion for Contempt.	2.0	600.00
10/24/22	Kagedan, Eitan	Fulton County: Review and consider submission directed by Special Master's Scheduling Order.	2.3	690.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
10/24/22	Kagedan, Eitan	Fulton County: Draft memorandum of law on nature of contempt proceedings as requested by Special Master.	3.1	930.00
10/24/22	Mascioli, Gianni	Fulton County: Call E. Kagedan to discuss research questions to address ahead of scheduled hearing on motion for sanctions against opposing party.	0.1	25.00
10/24/22	Mascioli, Gianni	Fulton County: Prepare note to E. Kagedan summarizing certain research findings ahead of scheduled hearing on motion for sanctions against opposing party.	0.5	125.00
10/24/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding strategy and research for contempt proceeding; review Order by Special Master; email to clients regarding same; research contempt case law in preparation for drafting memorandum of law in compliance with Special Master's Order.	3.2	1,408.00
10/24/22	Kotula, Kathleen	Review P.J. Cohn Jubelirer scheduling order	0.1	30.00
10/25/22	Kagedan, Eitan	Fulton County: Continue drafting memorandum of law on nature of contempt proceedings as requested by Special Master.	3.2	960.00
10/25/22	Kagedan, Eitan	Fulton County: Follow up research regarding anticipated issues in contempt proceedings.	0.8	240.00
10/25/22	Kagedan, Eitan	Fulton County: Draft discovery requests.	2.2	660.00
10/25/22	Wiygul, Robert	Fulton County: Telephone conference with A. Arteaga regarding prospective evidentiary hearing and obtaining subpoenas; email to Court staff regarding WebEx status conference; telephone conference with Dominion's outside counsel regarding status.	0.6	264.00
10/25/22	Wiygul, Robert	Fulton County: Revise memorandum of law required by October 24 Order.	1.4	616.00
10/25/22	Mavroudis, Dimitri	Conference call with R. Wiygul regarding strategy related to Application for Contempt against Petitioner Fulton County.	0.4	176.00
10/25/22	Boyer, Jacob	Review and edit memorandum of law in support application to hold Petitioners in contempt.	0.5	150.00
10/26/22	Arteaga, Alexandra	Fulton County: Review and cite check memo of law on nature of relief.	2.1	315.00
10/26/22	Arteaga, Alexandra	Fulton County: Review and analyze law on nature of relief, prepare Table of Authorities, and finalize for filing.	1.4	210.00
10/26/22	Arteaga, Alexandra	Fulton County: Review local rules re deposition subpoenas and contact the Commonwealth Court to obtain subpoenas.	0.6	90.00
10/26/22	Kagedan, Eitan	Fulton County: Review and edit Memorandum of Law concerning nature of relief sought.	1.9	570.00
10/26/22	Kagedan, Eitan	Fulton County: Review filings related to Motion for Contempt in preparation for discovery.	1.0	300.00
10/26/22	Wiygul, Robert	Fulton County: Revise and supplement memorandum of law required by October 24 Order; review comments by clients and OAG and further revise; finalize and file memorandum of law; review and analyze Petitioners' Answer to contempt application and memorandum of law regarding civil v. criminal contempt; emails to clients and R. Macias regarding same	10.0	4,400.00
10/26/22	Mavroudis, Dimitri	Review Respondent's Memorandum of Law on Nature for Relief in connection with the Application for Contempt against Petitioner Fulton County.	1.0	440.00
10/26/22	Kotula, Kathleen	Review draft memorandum of law re nature of relief sought	0.3	90.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
10/26/22	Mullen, Kathleen	Review draft brief re nature of relief sought	0.3	90.00
10/27/22	Kagedan, Eitan	Fulton County: Revise discovery requests in support of Motion for Contempt.	1.0	300.00
10/27/22	Kagedan, Eitan	Fulton County: Research concerning limits to scope of contempt proceedings and procedural requirements in preparation for status conference.	1.9	570.00
10/27/22	Kagedan, Eitan	Fulton County: Meet with client team to discuss issues related to Motion for Contempt.	0.8	240.00
10/27/22	Kagedan, Eitan	Fulton County: Prepare for, attend, and follow up regarding status conference on Motion for Contempt.	2.5	750.00
10/27/22	Mascioli, Gianni	Fulton County: Prepare note to E. Kagedan summarizing additional research findings ahead of hearing before Special Master.	0.6	150.00
10/27/22	Wiygul, Robert	Fulton County: Conference with clients and OAG in preparation for status conference; follow-up conference with E. Kagedan regarding same.	0.8	352.00
10/27/22	Wiygul, Robert	Fulton County: Prepare for and participate in status conference; follow-up conferences with E. Kagedan and R. Macias regarding scheduling and discovery issues; emails with Petitioners' counsel regarding scheduling issues.	3.0	1,320.00
10/27/22	Wiygul, Robert	Fulton County: Revise draft document requests relating to contempt proceeding.	1.0	440.00
10/27/22	Mavroudis, Dimitri	Attend conference call with R. Wiygul and client regarding discovery strategy for Application for Contempt against Petitioner Fulton County and Court status conference.	0.6	264.00
10/27/22	Mavroudis, Dimitri	Observe and take notes at virtual Court status conference.	0.6	264.00
10/27/22	Mavroudis, Dimitri	Review correspondence from R. Wiygul regarding proposed discovery schedule.	0.5	220.00
10/27/22	Mavroudis, Dimitri	Review Petitioners Memorandum of Law and Answer to Application for Contempt.	0.8	352.00
10/27/22	Boyer, Jacob	Conference to prepare for status conference; attend status conference.	2.0	600.00
10/27/22	Kotula, Kathleen	Attend meeting re strategy for Fulton hearing	0.5	150.00
10/27/22	Kotula, Kathleen	Review Petitioners' filings (answer and brief)	0.4	120.00
10/27/22	Kotula, Kathleen	Review draft email to Petitioners' counsel re: discovery/proceedings schedule	0.2	60.00
10/27/22	Fischer, Michael	Call with R. Wiygul; participate in teleconference regarding legal strategy; review draft schedule; correspond with client and outside attorneys regarding strategy	1.5	660.00
10/28/22	Arteaga, Alexandra	Fulton County: Review and analyze Proposed Scheduling Order and finalize for filing	0.7	105.00
10/28/22	Arteaga, Alexandra	Fulton County: Review and analyze discovery requests and draft cover letter for service of the same.	0.2	30.00
10/28/22	Hunter, Maria	Fulton County: Review Order regarding Rule to Show Cause hearing and update matter calendar.	0.1	15.00
10/28/22	Hunter, Maria	Fulton County: Review communications from counsel regarding court requirements regarding transcript for hearing and communications with court reporters regarding availability.	0.2	30.00
10/28/22	Kagedan, Eitan	Fulton County: Call with opposing counsel concerning scheduling issue; draft proposed scheduling order.	2.8	840.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
10/28/22	Kagedan, Eitan	Fulton County: Draft proposed factual stipulations.	3.3	990.00
10/28/22	Kagedan, Eitan	Fulton County: Research concerning potential privilege claims by Petitioners.	0.8	240.00
10/28/22	Kagedan, Eitan	Fulton County: Review Special Master's scheduling order and related communications.	0.4	120.00
10/28/22	Wiygul, Robert	Fulton County: Prepare for and conduct telephone conference with counsel for Petitioners and Intervenor regarding schedule; draft submission to Special Master regarding same; communications with clients regarding same; review Petitioners' submission and email clients regarding same; revise document requests and communicate with clients regarding same; finalize and serve document requests; review scheduling Order entered by Court and communicate with clients regarding same; serve Order on Petitioners' counsel and draft and file proof of service.	7.8	3,432.00
10/28/22	Mavroudis, Dimitri	Attend conference call with opposing counsel and counsel for Dominion regarding meet and confer relates to discovery prior to hearing on the Application for Contempt against Petitioner Fulton County.	1.0	440.00
10/28/22	Mavroudis, Dimitri	Review Requests for Documents in support of Application for Contempt against Petitioner Fulton County.	0.7	308.00
10/28/22	Mavroudis, Dimitri	Review the Secretary's Proposed Schedule.	0.3	132.00
10/28/22	Mavroudis, Dimitri	Review Propose Schedule Submission to the Court.	0.7	308.00
10/28/22	Mavroudis, Dimitri	Review Court Order setting schedule for discovery to be taken in advance of the hearing regarding the Application for Contempt against Petitioner Fulton County.	0.4	176.00
10/28/22	Kotula, Kathleen	Review draft proposed schedule	0.2	60.00
10/28/22	Kotula, Kathleen	Review Petitioners' filing re discovery and schedule	0.2	60.00
10/28/22	Kotula, Kathleen	Review draft requests for production of documents	0.3	90.00
10/28/22	Kotula, Kathleen	Review court order re scheduling	0.1	30.00
10/28/22	Fischer, Michael	Correspond with client regarding strategy; calls with client and outside attorneys regarding upcoming hearing	0.5	220.00
10/29/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' contempt-related filings to develop discovery requests and rebuttal arguments.	2.5	1,100.00
10/30/22	Hunter, Maria	Fulton County: Review correspondence from counsel regarding depositions.	0.1	15.00
10/30/22	Hunter, Maria	Fulton County: Communications with Court Reporting Agency scheduling videographer, court reporter and exhibit technician for remote depositions.	0.3	45.00
10/30/22	Hunter, Maria	Fulton County: Draft Notice of Remote Video Deposition directed to S. Ulsh pursuant to Pennsylvania rules.	0.5	75.00
10/30/22	Kagedan, Eitan	Fulton County: Complete drafts of Interrogatories and Requests for Admission.	1.8	540.00
10/30/22	Wiygul, Robert	Fulton County: Draft and revise interrogatories and requests for admission and research anticipated privilege issues; communications with E. Kagedan regarding interrogatories and requests for admission.	6.2	2,728.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
10/30/22	Wiygul, Robert	Fulton County: Email M. Hunter regarding video deposition notices directed to Commissioners; telephone conferences with E. Kagedan regarding next steps in assembling interrogatories and requests for admissions and strategy for responding to Petitioners' anticipated objections; revise deposition notice and communicate with M. Hunter regarding same	1.4	616.00
10/30/22	Boyer, Jacob	Review and edit discovery.	0.5	150.00
10/31/22	Hunter, Maria	Fulton County: Various communications with Frontino Reporting regarding deposition and hearing logistics.	0.3	45.00
10/31/22	Hunter, Maria	Fulton County: Review, update, finalize and submit Notices of Remote Video depositions directed to S. Ulsh, P. Shives and R. Bunch.	1.1	165.00
10/31/22	Hunter, Maria	Fulton County: Review, update, and finalize discovery requests.	0.8	120.00
10/31/22	Kagedan, Eitan	Fulton County: Draft responses to Fulton County's written discovery requests.	4.8	1,440.00
10/31/22	Kagedan, Eitan	Fulton County: Review, revise, and finalize Interrogatories, Requests for Admission, and Proposed Deposition Questions.	2.5	750.00
10/31/22	Kagedan, Eitan	Fulton County: Review and consider responses to Fulton County's discovery requests to Dominion and the Secretary.	1.8	540.00
10/31/22	Kagedan, Eitan	Fulton County: Research to support motion to compel discovery.	0.6	180.00
10/31/22	Wiygul, Robert	Fulton County: Telephone conference with R. Macias regarding Petitioners' discovery requests and schedule for preparing for evidentiary hearing.	0.4	176.00
10/31/22	Wiygul, Robert	Fulton County: Revise, supplement, and finalize interrogatories, requests for admission, proposed deposition questions, and notices of deposition directed to Fulton County Commissioners; communications with clients and E. Kagedan regarding same; review emails from "AttorneyLambert" email address purporting to contain discovery requests and analyze same; communications with clients and E. Kagedan regarding same.	6.9	3,036.00
10/31/22	Kotula, Kathleen	Review draft discovery documents (depositions, admissions, interrogatories)	0.3	90.00
10/31/22	Kotula, Kathleen	Review Petitioners' discovery requests	0.5	150.00
10/31/22	Mullen, Kathleen	Reviewed discovery requests	0.3	90.00
10/31/22	Fischer, Michael	Review and edit discovery requests	0.5	220.00
11/01/22	Hunter, Maria	Fulton County: Various communications with Frontino Reporting regarding court reporter for evidentiary hearing.	0.2	30.00
11/01/22	Hunter, Maria	Fulton County: Draft Notices to Attend directed to R. Bunch, S. Ulsh and P. Shives.	0.2	30.00
11/01/22	Kagedan, Eitan	Fulton County: Draft responses to Petitioners' Interrogatories and Requests for Admission.	2.8	840.00
11/01/22	Kagedan, Eitan	Fulton County: Develop strategy for completing discovery and litigating discovery issues.	0.4	120.00
11/01/22	Kagedan, Eitan	Fulton County: Draft Motion to Compel Deposition Appearances.	3.2	960.00
11/02/22	Hunter, Maria	Fulton County: Prepare copies of exhibits for potential use at hearing.	1.4	210.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/02/22	Hunter, Maria	Fulton County: Review, update, and finalize Secretary's Responses and Objections to Petitioners' Requests for Discovery.	0.7	105.00
11/02/22	Hunter, Maria	Fulton County: Review, update, finalize and file Entry of Appearance of E. Kagedan.	0.4	60.00
11/02/22	Hunter, Maria	Fulton County: Communications with Pennsylvania Supreme Court regarding E. Kagedan's Entry of Appearance.	0.2	30.00
11/02/22	Kagedan, Eitan	Fulton County: Revise and finalize written discovery responses.	1.4	420.00
11/02/22	Kagedan, Eitan	Fulton County: Review and analyze Petitioners' Application for Injunction and plan response.	3.3	990.00
11/02/22	Kagedan, Eitan	Fulton County: Draft and revise verifications for filings.	0.3	90.00
11/02/22	Kagedan, Eitan	Fulton County: Research concerning scope and contours of deliberative process privilege in response to Petitioners' filings.	0.5	150.00
11/02/22	Kagedan, Eitan	Fulton County: Revise Motion to Compel Deposition Appearances per R. Wiygul's comments.	2.1	630.00
11/02/22	Wiygul, Robert	Fulton County: Review and analyze SCOPA order referring Petitioners' application to enjoin discovery to Special Master and consider next steps; email clients regarding same.	0.6	264.00
11/02/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding SCOPA order reimposing discovery schedule and next steps.	0.3	132.00
11/02/22	Wiygul, Robert	Fulton County: Review and revise draft responses to Petitioners' discovery responses; finalize and serve requests; review and analyze Petitioners' emergency application to enjoin discovery and email clients regarding same; review Justice Wecht's order temporarily enjoining discovery and email clients regarding same.	4.1	1,804.00
11/02/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding preparation for evidentiary hearing related to the Secretary's application for contempt.	0.1	44.00
11/02/22	Kotula, Kathleen	Review draft responses and objections to Petitioners' discovery requests	0.3	90.00
11/02/22	Kotula, Kathleen	Review Petitioners' application for relief re discovery	0.3	90.00
11/02/22	Kotula, Kathleen	Review Justice Wecht order re administrative stay	0.1	30.00
11/02/22	Kotula, Kathleen	Review SCOPA order re deadlines	0.1	30.00
11/02/22	Fischer, Michael	Review and edit motion to compel	0.3	110.00
11/03/22	Hunter, Maria	Fulton County: Review, update, finalize and file Motion to Compel Depositions and prepare exhibits in support.	2.2	330.00
11/03/22	Hunter, Maria	Fulton County: Various communications with counsel and Court Reporting Agency regarding depositions.	1.3	195.00
11/03/22	Hunter, Maria	Fulton County: Various communications with Frontino regarding court reporter for evidentiary hearing.	0.3	45.00
11/03/22	Hunter, Maria	Fulton County: Review, update, and finalize Notice to the Court regarding Petitioners' Response and Objections to the Secretary's discovery.	0.6	90.00
11/03/22	Hunter, Maria	Fulton County: Review and update documents designated for potential use at evidentiary hearing.	1.6	240.00
11/03/22	Kagedan, Eitan	Fulton County: Review and incorporate revisions to motion to compel depositions.	1.6	480.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/03/22	Kagedan, Eitan	Fulton County: Review strategy notes for upcoming status conference.	0.2	60.00
11/03/22	Kagedan, Eitan	Fulton County: Continue researching contours of deliberative process privilege in response to Petitioners' filings.	1.1	330.00
11/03/22	Kagedan, Eitan	Fulton County: Review Petitioners' responses to the Secretary's discovery requests and draft notice concerning deficiencies.	1.3	390.00
11/03/22	Kagedan, Eitan	Fulton County: Identify and prepare exhibits for evidentiary hearing.	2.8	840.00
11/03/22	Kagedan, Eitan	Fulton County: Draft application for discovery sanctions.	4.3	1,290.00
11/03/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' discovery responses; conference with E. Kagedan regarding Notice to the Court; revise Notice to Court and email clients regarding same; review Special Master's Order; emails with clients regarding same; revise and serve Notices to Attend the evidentiary hearing and email clients regarding same.	1.8	792.00
11/03/22	Wiygul, Robert	Fulton County: Revise verifications of discovery responses and email clients regarding same; revise motion to compel depositions and email clients regarding same.	2.1	924.00
11/03/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding attendance at hearing before the Special Master.	0.1	44.00
11/03/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding Special Master Order for discovery and status conference attendance.	0.2	88.00
11/03/22	Mavroudis, Dimitri	Review and analyze Special Master's Order regarding pre-hearing discovery.	0.6	264.00
11/03/22	Mavroudis, Dimitri	Review motion to compel depositions of Commissioners Ulsh, Bunch, and Shives.	0.6	264.00
11/03/22	Mavroudis, Dimitri	Review Petitioners Objections and Responses to written discovery requests.	0.8	352.00
11/03/22	Mullen, Kathleen	Review draft motion to compel depositions	0.1	30.00
11/03/22	Kotula, Kathleen	Review draft notice re Petitioners' responses and objections to discovery	0.3	90.00
11/03/22	Kotula, Kathleen	Review court order re Secretary's emergency application to compel	0.1	30.00
11/04/22	Hunter, Maria	Fulton County: Review Commonwealth Court protocols for Court Reporters, and communications with counsel and Agency regarding same.	0.9	135.00
11/04/22	Hunter, Maria	Fulton County: Coordinate tech systems for Status Conference call with Court.	0.3	45.00
11/04/22	Hunter, Maria	Fulton County: Review, update, finalize and file Application for Discovery Sanctions.	1.3	195.00
11/04/22	Hunter, Maria	Fulton County: Communications with Court Reporter and counsel regarding Telephonic Status Conference.	0.2	30.00
11/04/22	Kagedan, Eitan	Fulton County: Continue drafting application for discovery sanctions.	4.7	1,410.00
11/04/22	Kagedan, Eitan	Fulton County: Review Petitioners' filing Motion for Predicate Legal Rulings and prepare for status conference.	4.1	1,230.00
11/04/22	Wiygul, Robert	Fulton County: Prepare for and attend status conference; communications with J. Boyer and E. Kagedan regarding next steps; email to clients regarding status conference.	1.8	792.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/04/22	Wiygul, Robert	Fulton County: Revise and supplement motion for discovery sanctions and communicate with E. Kagedan and clients regarding same.	1.8	792.00
11/04/22	Wiygul, Robert	Fulton County: Review and analyze order from Special Master and email clients regarding same.	0.4	176.00
11/04/22	Boyer, Jacob	Attend status conference; conference with co-counsel about next steps.; review and edit motion for sanctions.	2.0	600.00
11/04/22	Kotula, Kathleen	Review court order re objections to discovery and sanctions	0.1	30.00
11/04/22	Mullen, Kathleen	Review motion for discovery sanctions	0.1	30.00
11/04/22	Fischer, Michael	Correspond with client and outside counsel regarding strategy; calls with client and outside counsel; review Special Master order	0.5	220.00
11/05/22	Hunter, Maria	Fulton County: Review Order issued post-Status Conference and coordinate Court Reporting services for depositions.	0.5	75.00
11/05/22	Hunter, Maria	Fulton County: Review and update documents for potential use at Evidentiary Hearing.	0.5	75.00
11/05/22	Kagedan, Eitan	Fulton County: Draft outline for examination of expert witness Ryan Macias.	2.6	780.00
11/05/22	Wiygul, Robert	Fulton County: Emails and telephone conference with R. Macias regarding logistics and substance of testimony at evidentiary hearing.	0.5	220.00
11/05/22	Wiygul, Robert	Fulton County: Review and analyze potential deposition and hearing exhibits in preparation for depositions and hearings and filing of exhibit list.	2.2	968.00
11/06/22	Kagedan, Eitan	Fulton County: Finish drafting expert examination outline and videoconference with Ryan Macias to prepare for hearing.	6.0	1,800.00
11/06/22	Kagedan, Eitan	Fulton County: Identify and prepare additional exhibits for evidentiary hearing.	1.6	480.00
11/06/22	Wiygul, Robert	Fulton County: Review outline of R. Macias examination; conference with R. Macias regarding testimony at evidentiary hearing; conference with E. Kagedan regarding revisions to outline of R. Macias examination.	1.7	748.00
11/07/22	Hill, John	Fulton County: Revise response in opposition to Petitioners' emergency application for injunction filed in Pa. Supreme Court.	0.5	125.00
11/07/22	Hunter, Maria	Fulton County: Various communications with Frontino regarding Court Reporter for Evidentiary Hearing.	0.2	30.00
11/07/22	Hunter, Maria	Fulton County: Review of transcript of November 4 Status Conference.	0.2	30.00
11/07/22	Hunter, Maria	Fulton County: Review of Pa. Supreme Court Letter scheduling deadline for Response to Petitioners' Emergency Application for injunction.	0.1	15.00
11/07/22	Hunter, Maria	Fulton County: Review and update list of Secretary's Hearing Exhibits.	0.7	105.00
11/07/22	Kagedan, Eitan	Fulton County: Draft Exhibit and Witness List.	1.0	300.00
11/07/22	Kagedan, Eitan	Fulton County: Prepare for examination of R. Macias and videoconference with R. Macias regarding same.	2.5	750.00
11/07/22	Wiygul, Robert	Conference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	0.2	88.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/07/22	Wiygul, Robert	Fulton County: Videoconference with R. Macias to prepare for hearing testimony; conference with E. Kagedan regarding revisions to witness and exhibit lists and estimate of time needed to present case.	1.4	616.00
11/07/22	Boyer, Jacob	Conference with co-counsel; review and edit application for relief.	1.0	300.00
11/07/22	Kotula, Kathleen	Review draft answer in opposition to emergency application to enjoin depositions	0.3	90.00
11/07/22	Kotula, Kathleen	Review draft application for contempt	0.4	120.00
11/07/22	Mullen, Kathleen	Draft declaration for J. Marks in response to allegations in Petitioners' Emergency Application for Relief	0.4	120.00
11/07/22	Mullen, Kathleen	Review answer in opposition to Petitioners' Emergency Application for Relief	0.2	60.00
11/07/22	Mullen, Kathleen	Review and edit application for contempt for violation of Special Master's Order	0.2	60.00
11/07/22	Fischer, Michael	Review contempt motion; teleconference with client and outside counsel regarding upcoming hearing	0.5	220.00
11/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file The Secretary's Exhibit and Witness List.	0.6	90.00
11/08/22	Hunter, Maria	Fulton County: Review and update exhibits and other materials for potential use at hearing.	1.6	240.00
11/08/22	Hunter, Maria	Fulton County: Communications with Clerk of Court regarding exhibit assembly and presentation preference.	0.1	15.00
11/08/22	Hunter, Maria	Fulton County: Prepare archival paper copies of Secretary's filings since October 21, 2022 for delivery to Commonwealth Court.	0.5	75.00
11/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Application for Relief Concerning Evidentiary Hearing.	0.8	120.00
11/08/22	Hunter, Maria	Prepare trial notebook for evidentiary hearing at counsel's direction.	1.4	210.00
11/08/22	Hunter, Maria	Fulton County: Review and update hearing outline for examination of Commissioners with references to hearing exhibits.	1.2	180.00
11/08/22	Hunter, Maria	Fulton County: Travel from Narberth to Harrisburg for evidentiary hearing.	1.5	225.00
11/08/22	Kagedan, Eitan	Fulton County: Prepare for evidentiary hearing, including review of examination outlines, preparation of documentary materials.	5.0	1,500.00
11/08/22	Kagedan, Eitan	Fulton County: Manage filing of exhibit and witness lists and preparation of copies of exhibits for evidentiary hearing.	1.4	420.00
11/08/22	Kagedan, Eitan	Fulton County: Draft Applications for order requiring Petitioners' counsel to verify that Commissioners have been provided with Notices to Attend evidentiary hearing and related orders.	0.8	240.00
11/08/22	Kagedan, Eitan	Fulton County: Research issues related to Petitioners' Motion to Suspend Proceedings.	0.4	120.00
11/08/22	Kagedan, Eitan	Fulton County: Travel to Harrisburg.	2.0	600.00
11/08/22	Kagedan, Eitan	Fulton County: Analyze exhibits to identify those for which to seek lay foundation and admission at evidentiary hearing.	0.4	120.00
11/08/22	Wiygul, Robert	Fulton County: Attend conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/08/22	Wiygul, Robert	Fulton County: Revise application for relief regarding evidentiary hearing and email clients regarding same.	0.9	396.00
11/08/22	Wiygul, Robert	Fulton County: Review potential exhibits and examination outline and conference with team in preparation for evidentiary hearing (including travel between Philadelphia and Harrisburg).	3.5	1,540.00
11/08/22	Boyer, Jacob	Conference with co-counsel, which included discussion of Fulton County case.	0.1	30.00
11/08/22	Mavroudis, Dimitri	Review outline for the examination of Fulton County Commissioner witnesses.	0.8	352.00
11/08/22	Kotula, Kathleen	Review Petitioners' answer to application for contempt	0.3	90.00
11/08/22	Kotula, Kathleen	Review draft supplemental application for sanctions	0.3	90.00
11/08/22	Kotula, Kathleen	Review court order denying Petitioners' application for relief	0.1	30.00
11/08/22	Mullen, Kathleen	Review answer to application for contempt	0.1	30.00
11/08/22	Fischer, Michael	Correspond with client and outside counsel regarding hearing; review Special Master order; review draft application regarding notice to Fulton County witnesses; review answer filed by Fulton County	1.0	440.00
11/08/22	Fischer, Michael	Correspond with client and outside counsel regarding possible bench warrants; research statute addressing immunity from prosecution for election officials	0.5	220.00
11/09/22	Hunter, Maria	Plan for and attend Evidentiary Hearing on Application for Contempt.	10.0	1,500.00
11/09/22	Kagedan, Eitan	Fulton County: Prepare, appear for, and follow up regarding evidentiary hearing.	10.5	3,150.00
11/09/22	Wiygul, Robert	Fulton County: Prepare for and participate in evidentiary hearing; conference with co-counsel regarding strategy; conference with R. Macias regarding expert testimony.	10.9	4,796.00
11/09/22	Mavroudis, Dimitri	Travel to and attend evidentiary hearing in Harrisburg before the Special Master regarding the Secretary of the Commonwealth's Application for Contempt.	13.0	5,720.00
11/10/22	Hunter, Maria	Fulton County: Plan for and attend second day of Evidentiary Hearing.	11.5	1,725.00
11/10/22	Hunter, Maria	Fulton County: Travel from Harrisburg to Narberth following evidentiary hearing.	1.8	270.00
11/10/22	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning Evidentiary Hearing (including travel from Harrisburg to Philadelphia).	14.0	4,200.00
11/10/22	Wiygul, Robert	Fulton County: Prepare for and attend second day of evidentiary hearing (including travel from Harrisburg to Philadelphia).	13.1	5,764.00
11/10/22	Mavroudis, Dimitri	Observe via webcast evidentiary hearing in Harrisburg before the Special Master regarding the Secretary of the Commonwealth's Application for Contempt.	2.8	1,232.00
11/11/22	Hill, John	Fulton County: Research and analyze issues arising during contempt hearing regarding ultra vires actions of Commissioners Ulsh and Bunch in preparation for drafting post-hearing submission.	2.5	625.00
11/11/22	Hunter, Maria	Fulton Hearing: Post-Hearing organization of materials used at hearing in Harrisburg.	0.5	75.00
11/11/22	Hunter, Maria	Fulton County: Communications with Frontino Reporting regarding Court Reporter and exhibit tech for continued Evidentiary Hearing, scheduled for Monday, November 14, 2022.	0.4	60.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/11/22	Hunter, Maria	Fulton County: Review of Court Orders regarding continued Evidentiary Hearing and regarding preservation of key access log document.	0.2	30.00
11/11/22	Hunter, Maria	Fulton County: Upload the Secretary's hearing exhibits to Court's site for continued hearing.	0.1	15.00
11/11/22	Kagedan, Eitan	Fulton County: Begin drafting Proposed Findings of Fact.	6.8	2,040.00
11/11/22	Wiygul, Robert	Fulton County: Telephone conference with M. Fischer regarding evidentiary hearing and next steps.	0.3	132.00
11/11/22	Wiygul, Robert	Fulton County: Telephone conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.3	132.00
11/11/22	Wiygul, Robert	Fulton County: Email court staff regarding access needed to upload exhibits and need for trial tech; email R. Macias following up on hearing.	0.3	132.00
11/11/22	Wiygul, Robert	Fulton County: Begin reviewing and annotating hearing transcripts in preparation for drafting post-hearing submission; research case law regarding Fifth Amendment and adverse-inference issues to address in post-hearing submission.	5.1	2,244.00
11/11/22	Fischer, Michael	Teleconference with client and outside counsel regarding hearing	0.5	220.00
11/12/22	Kagedan, Eitan	Fulton County: Continue drafting Proposed Findings of Fact.	4.4	1,320.00
11/12/22	Wiygul, Robert	Fulton County: Continue reviewing and annotating hearing transcripts in preparation for drafting post-hearing brief and conference with E. Kagedan regarding draft of proposed findings of fact; research implications of voting-machine inspections' having been conducted without a vote of the Board of Elections.	3.4	1,496.00
11/13/22	Kagedan, Eitan	Fulton County: Continuing drafting and revising Proposed Findings of Fact.	10.7	3,210.00
11/13/22	Wiygul, Robert	Fulton County: Research unclean hands doctrine as basis for dismissing lawsuit; analyze and annotate Petitioners' briefs before Supreme Court and Special Master regarding contempt issues in preparation for drafting argument section of post-hearing submission; prepare for examination of R. Bunch.	5.1	2,244.00
11/14/22	Hunter, Maria	Fulton County: Communications with Court Clerk regarding transcript of October 27, 2022 Status Conference.	0.1	15.00
11/14/22	Hunter, Maria	Fulton County: Review of transcript of October 27, 2022 Status Conference.	0.1	15.00
11/14/22	Hunter, Maria	Fulton County: Draft correspondence to Court enclosing archival copies of filings.	0.1	15.00
11/14/22	Hunter, Maria	Fulton County: Review of Order extending deadline for post-hearing submissions and update matter calendar.	0.3	45.00
11/14/22	Hunter, Maria	Fulton County: Review and cite-check of record references in the Secretary's draft proposed findings of fact.	0.8	120.00
11/14/22	Kagedan, Eitan	Fulton County: Attend evidentiary hearing on Application for Contempt.	3.5	1,050.00
11/14/22	Kagedan, Eitan	Fulton County: Revise partial draft of Post-Hearing submission.	5.7	1,710.00
11/14/22	Wiygul, Robert	Fulton County: Draft outline and prepare for examination of R. Bunch; attend third day of evidentiary hearing.	4.9	2,156.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/14/22	Wiygul, Robert	Fulton County: Emails with T. Carroll regarding key access log; communications with E. Kagedan regarding same; conduct initial review of draft proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing elements of contempt.	6.7	2,948.00
11/15/22	Hill, John	Fulton County: Confer with R. Wiygul regarding contempt proceeding in preparation for review of post-hearing submission.	0.2	50.00
11/15/22	Hill, John	Fulton County: Review and analyze draft post-hearing submission.	0.5	125.00
11/15/22	Hunter, Maria	Fulton County: Review of redacted copy of November 10, 2022 hearing transcript.	0.1	15.00
11/15/22	Hunter, Maria	Fulton County: Review, cite-check, and revise references to case law and record in Argument section of post-hearing submission.	1.1	165.00
11/15/22	Hunter, Maria	Fulton County: Prepare exhibit in support of the Secretary's post-hearing submission.	0.1	15.00
11/15/22	Kagedan, Eitan	Fulton County: Review and revise post-hearing submission and findings of fact.	6.2	1,860.00
11/15/22	Kagedan, Eitan	Fulton County: Research on Fifth Amendment protections with respect to responses to document requests and subpoenas in preparation for responding to Petitioners' argument against admission of key access log.	1.0	300.00
11/15/22	Wiygul, Robert	Fulton County: Additional emails with T. Carroll regarding admission of key access log; review and revise proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing why Petitioners should pay the Secretary's costs and fees, why Petitioners should be required to relinquish custody of the voting machines, and why the Secretary's Exhibit 1 should be admitted into evidence; email to clients transmitting draft of post-hearing submission; communications with E. Kagedan regarding further revisions to post-hearing submission.	9.4	4,136.00
11/15/22	Mullen, Kathleen	Review and edit post-hearing submission	2.2	660.00
11/16/22	Hunter, Maria	Fulton County: Review hearing notes regarding length of cross-examination of expert R. Macias for inclusion in Secretary's post-hearing submission.	0.2	30.00
11/16/22	Kagedan, Eitan	Fulton County: Finalize post-hearing submission.	0.8	240.00
11/16/22	Kagedan, Eitan	Fulton County: Review Petitioners' post-hearing filing.	0.9	270.00
11/16/22	Wiygul, Robert	Fulton County: Revise, supplement by adding introduction, and file post-hearing submission; communications with E. Kagedan and clients regarding same; review Dominion's post-hearing submission and email clients regarding same.	3.5	1,540.00
11/16/22	Mavroudis, Dimitri	Review draft Post-Hearing submission.	1.4	616.00
11/16/22	Boyer, Jacob	Review and edit Post-Hearing submission.	2.0	600.00
11/16/22	Kotula, Kathleen	Review draft post-hearing submission	0.8	240.00
11/16/22	Kotula, Kathleen	Review Petitioners' post-hearing submission	0.4	120.00
11/16/22	Mullen, Kathleen	Review Petitioners' PPOF/Conclusions of law	0.2	60.00
11/17/22	Kagedan, Eitan	Revise application to admit Key Access Log into evidence.	1.2	360.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/17/22	Wiygul, Robert	Fulton County: Draft and revise application to admit key access log or for discovery sanctions; communications with E. Kagedan regarding same; review Special Master's order regarding evidentiary issues and email clients regarding same; emails with clients regarding draft application to admit key access log or for discovery sanctions.	3.9	1,716.00
11/17/22	Kotula, Kathleen	Review court order	0.1	30.00
11/17/22	Kotula, Kathleen	Review draft supplemental application for discovery sanctions	0.3	90.00
11/17/22	Mullen, Kathleen	Review Supplemental Application to Admit Evidence or Impose Discovery Sanctions	0.2	60.00
11/17/22	Fischer, Michael	Review and edit application for admission of key access log; correspond regarding status of litigation with other OAG attorneys	0.5	220.00
11/18/22	Hill, John	Fulton County: Review and comment on updated draft of post-hearing submission.	0.3	75.00
11/18/22	Kagedan, Eitan	Fulton County: Review and comment on revised Application to Admit Key Access Log into evidence.	0.7	210.00
11/18/22	Wiygul, Robert	Fulton County: Further revise application regarding key access log per M. Fischer's comments and Special Master's Order dated November 17, 2022; email to clients regarding same; finalize and file same; email same to court staff.	1.3	572.00
11/18/22	Wiygul, Robert	Fulton County: Review Petitioners' response to application to admit key access log and email clients regarding same; review Order granting application to admit and email clients regarding same.	0.3	132.00
11/18/22	Wiygul, Robert	Fulton County: Review Order disposing of applications for discovery sanctions and relief for violations of Special Master's Orders and email clients regarding same.	0.3	132.00
11/18/22	Wiygul, Robert	Fulton County: Initial review of Special Master's Report and Recommendations; emails with clients regarding same.	0.8	352.00
11/18/22	Boyer, Jacob	Review Report and Recommendation.	1.0	300.00
11/18/22	Kotula, Kathleen	Review Petitioners' response to application to admit key access log	0.1	30.00
11/18/22	Kotula, Kathleen	Review court order re key access log	0.1	30.00
11/18/22	Kotula, Kathleen	Review court order re application for discovery sanctions	0.1	30.00
11/18/22	Kotula, Kathleen	Review court's report and recommendations	0.8	240.00
11/19/22	Wiygul, Robert	Fulton County: Detailed review and analysis of Special Master's Report and Recommendations; emails with clients regarding same.	0.9	396.00
11/19/22	Fischer, Michael	Review report & recommendation	0.8	330.00
11/20/22	Kagedan, Eitan	Fulton County: Review Special Master's Report and Recommendation.	1.1	330.00
11/21/22	Kagedan, Eitan	Review and analyze Special Master's Report and Recommendation.	0.9	270.00
11/22/22	Hunter, Maria	Fulton County: Review of Order regarding Application for Discovery Sanctions and update matter calendar regarding submission of supporting documentation.	0.2	30.00
11/22/22	Wiygul, Robert	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County and related cases.	0.2	88.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
11/29/22	Kagedan, Eitan	Fulton County: Analyze hearing transcripts to identify portions for use in anticipated Pa. Supreme Court submission.	2.8	840.00
12/01/22	Kagedan, Eitan	Fulton County: Assess basis for potential criminal referral.	1.0	300.00
12/01/22	Wiygul, Robert	Fulton County: Videoconference with OAG attorneys regarding ethical issues involving Petitioners' counsel.	0.7	308.00
12/01/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding evidence supporting application for fees.	0.3	132.00
12/01/22	Boyer, Jacob	Conference regarding ethical issues involving Petitioners' counsel.	0.7	210.00
12/04/22	Hunter, Maria	Fulton County: Review and analysis of vendor invoices relating to depositions in support of application for fees.	0.5	75.00
12/05/22	Hunter, Maria	Fulton County: Review and analysis of Court Reporter invoice and copying invoices for work done for depositions in support of application for fees.	0.3	45.00
12/06/22	Hunter, Maria	Fulton County: Communications with team regarding preparation of application for fees relating to depositions.	0.5	75.00
12/06/22	Kagedan, Eitan	Fulton County: Research requirements for fee application.	0.5	150.00
12/07/22	Hunter, Maria	Fulton County: Review and revise draft M. Hunter Affidavit in Support of Application for deposition-related fees and costs.	0.6	90.00
12/07/22	Kagedan, Eitan	Fulton County: Review and revise draft Affidavits and fee application.	1.1	330.00
12/07/22	Wiygul, Robert	Fulton County: Draft application for award of deposition-related costs and fees and supporting affidavits pursuant to Special Master's November 18 Order; email to T. Gates regarding his draft affidavit; email to clients transmitting draft submission for their review and comments.	6.4	2,816.00
12/07/22	Wiygul, Robert	Fulton County: Review Dominion's application for an award of costs and fees; email to clients regarding same.	0.5	220.00
12/07/22	Kotula, Kathleen	Review draft application for award of deposition fees and costs	0.2	60.00
12/08/22	Hunter, Maria	Fulton County: Review and update exhibits 1 and 2 to R. Wiygul Affidavit in support of application for deposition-related fees.	0.1	15.00
12/08/22	Hunter, Maria	Fulton County: Review correspondence from Court regarding deadline to respond to Dominion Application for Fees and update matter calendar regarding same.	0.1	15.00
12/08/22	Hunter, Maria	Fulton County: Prepare redacted version to Exhibit 3 to R. Wiygul Affidavit in support of application for fees.	0.5	75.00
12/08/22	Hunter, Maria	Fulton County: Review and cite check R. Wiygul Affidavit in Support of Application for Fees.	0.7	105.00
12/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file Application for Fees.	1.8	270.00
12/08/22	Wiygul, Robert	Fulton County: Review correspondence from Pa. Supreme Court regarding response to Dominion's application for fees and email clients regarding same.	0.2	88.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
12/08/22	Wiygul, Robert	Fulton County: Communications with M. Hunter regarding redactions to invoices to be submitted in support of request for deposition-related fees and finalization of exhibits to fee request; emails to clients regarding fee request; revise and finalize fee requests and supporting exhibits.	1.1	484.00
12/15/22	Kagedan, Eitan	Fulton County: Research standards and requirements for fee petitions in preparation for drafting petition to recover all appeal-related fees and costs in accordance with Special <u>Master's Recommendation</u> .	2.0	600.00
12/15/22	Wiygul, Robert	Weekly conference call with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.2	88.00
12/19/22	Kagedan, Eitan	Fulton County: Check in regarding Dominion application for fees and prepare no answer letter.	0.3	90.00
12/20/22	Wiygul, Robert	Fulton County: Revise no-answer letter in response to Dominion's application for fees and email clients regarding same.	0.2	88.00
12/21/22	Wiygul, Robert	Fulton County: Communications with clients regarding response to Dominion's application for fees and finalize and file same.	0.2	88.00
12/21/22	Wiygul, Robert	Fulton County: Email clients regarding Petitioners' response to Dominion's application for costs and fees.	0.1	44.00
12/22/22	Wiygul, Robert	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters; review federal court docket to determine status of Fulton County v. Dominion case.	0.2	88.00
12/29/22	Wiygul, Robert	Fulton County: Review order awarding the Secretary her deposition-related fees and costs; email clients regarding same.	0.2	88.00
12/29/22	Kotula, Kathleen	Review court order awarding deposition fees and costs	0.1	30.00
01/05/23	Wiygul, Robert	Attend weekly conference call with clients, OAG, and SUDC regarding the status of the Fulton County case and related cases.	0.1	44.00
01/30/23	Wiygul, Robert	Review check and cover letter received from Petitioners' counsel regarding award of deposition-related costs and fees; emails with clients regarding same; draft letter to K. Kotula enclosing check.	0.5	220.00
04/19/23	Kagedan, Eitan	Fulton County: Conduct comprehensive review and analysis of Pa. Supreme Court opinions resolving Secretary's appeal and application for sanctions; identify outstanding issues for potential future briefing; assess implications for case going forward; draft summary of Pa. Supreme Court opinions for clients; communications with clients and HASPS team regarding Supreme Court decision.	3.6	1,080.00
04/19/23	Wiygul, Robert	Fulton County: Review Supreme Court opinions awarding sanctions and resolving appeal; communications with team, clients, and counsel for Dominion regarding same.	1.5	660.00
04/19/23	Boyer, Jacob	Review SCOPA opinion	1.0	300.00
04/19/23	Kotula, Kathleen	Review SCOPA opinion	1.5	450.00
04/19/23	Mullen, Kathleen	Review and analyze SCOPA opinion	1.5	450.00
04/20/23	Kagedan, Eitan	Fulton County: Review correspondence concerning outstanding issues raised by SCOPA Opinion.	0.1	30.00
04/21/23	Kagedan, Eitan	Fulton County: Assemble invoices for fee petition.	0.3	90.00

Exhibit B - Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
04/25/23	Kagedan, Eitan	Fulton County: Review correspondence from court.	0.1	30.00
04/27/23	Wiygul, Robert	Attend weekly conference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.2	88.00
04/28/23	Kagedan, Eitan	Fulton County: Develop strategy for drafting fee petition, including review of prior filings and consideration of including Commonwealth attorney time expenditures.	0.7	210.00
04/28/23	Hunter, Maria	Review of Order regarding Motions for Fees and Costs and update matter calendar regarding same.	0.1	15.00
04/28/23	Wiygul, Robert	Fulton County: Review Special Master's Order setting deadlines for fee submission and status report regarding expert report; telephone conference with E. Kagedan regarding next steps; email to clients regarding same.	0.4	176.00
04/28/23	Kotula, Kathleen	Review special master's scheduling order	0.1	30.00
05/22/23	Kotula, Kathleen	Calculate time in Fulton County matter	2.0	600.00

Totals	1016.3	\$	341,122.00
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<i>Fees incurred up to and through April 12, 2022</i>	388.8	\$	128,272.00
<i>Fees incurred after April 12, 2022</i>	627.5	\$	212,850.00

Time Keeper	Hours	Amount
Aronchick, Mark A.	7.50	\$ 3,300.00
Hangley, Michele D.	23.60	\$ 10,384.00
Wiygul, Robert	396.20	\$ 169,153.00
Hill, John	8.70	\$ 2,194.00
Kagedan, Eitan	329.80	\$ 97,290.00
Mascioli, Gianni	23.30	\$ 5,825.00
Fischer, Michael	13.50	\$ 5,940.00
Kotula, Kathleen	23.40	\$ 7,020.00
Mullen, Kathleen	7.50	\$ 2,250.00
Boyer, Jacob	16.00	\$ 4,800.00
Mavroudis, Dimitri	27.40	\$ 12,056.00
Arteaga, Alexandra	21.20	\$ 3,180.00
Ferrari, Kim	40.50	\$ 6,075.00
Hunter, Maria	77.70	\$ 11,655.00

EXHIBIT C

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113012	12/16/21	Kagedan, Eitan	Fulton: Research to support basis for motion for entry of preservation order.	1.0	300.00
40113012	12/16/21	Wiygul, Robert	Draft and revise emergency application for preservation order prohibiting December 22 "examination" of voting equipment by Envoy Sage and communications with team, clients, and OAG regarding same.	9.1	2,866.50
40113012	12/17/21	Ferrari, Kim	Review and cite check emergency application for Order re spoliation of evidence; review and analyze key communications and organize exhibits for same; draft potential declaration of M. Hangley; review emails with King; file with Commonwealth court.	6.0	900.00
40113012	12/17/21	Hangley, Michele D.	Edits, discussion, finalizing and filing spoliation motion.	3.0	1,320.00
40113012	12/17/21	Kagedan, Eitan	Fulton County: Review, revise, and hone strategy regarding Emergency Motion to Preserve Evidence and related communications and prepare same for filing.	4.0	1,200.00
40113012	12/17/21	Kagedan, Eitan	Fulton County: Draft and revise Macias Affidavit in support of Emergency Motion regarding Spoliation.	2.2	660.00
40113012	12/17/21	Wiygul, Robert	Revise and finalize emergency application to enjoin Envoy Sage inspection and supporting documents and communicate with team, clients, OAG, and R. Macias regarding same.	5.7	1,795.50
	12/17/21	Kotula, Kathleen	Review draft emergency application re spoliation	0.3	90.00
	12/17/21	Kotula, Kathleen	Review letter from Dominion to Fulton County re proposed inspection	0.2	60.00
40113012	12/18/21	Hangley, Michele D.	Review, consider and circulate to team King's comments to press on spoliation motion.	0.5	220.00
40113012	12/18/21	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding Envoy Sage "inspection."	0.6	180.00
40113012	12/18/21	Wiygul, Robert	Conference with K. Stimson regarding recent developments relating to scheduled inspection of Fulton County's voting equipment.	0.3	94.50
40113012	12/18/21	Wiygul, Robert	Communications with team, clients, Dominion's counsel about scheduling order relating to emergency application to enjoin inspection; communications with team, clients, Dominion's counsel, and R. Macias regarding press-reported interview of T. King regarding purpose of inspection.	1.2	378.00
40113012	12/20/21	Hangley, Michele D.	Spoliation motion: review response, prepare for argument, discuss strategy.	2.5	1,100.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Review and analyze Opposition to Application for Emergency Relief.	0.5	150.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Research whether an order denying Emergency Motion Regarding Spoliation is subject to immediate appeal.	3.2	960.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Review draft application for leave to submit AP article.	0.3	90.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Meet with Ryan Macias to discuss planned Envoy Sage "inspection" and follow up with Michele Hangley and Rob Wiygul.	2.1	0.00
40113012	12/20/21	Wiygul, Robert	Prepare for and conduct call with R. Macias regarding Fulton County emergency application and oral argument (including preparatory call with M. Hangley).	1.0	315.00
40113012	12/20/21	Wiygul, Robert	Review and analyze Petitioners' answer to emergency application and communicate with team and clients regarding same; review memorandum by E. Kagedan regarding potential appealability of order denying emergency application; draft application for leave to submit additional exhibit in support of emergency application.	4.9	1,543.50

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113012	12/20/21	Wiygul, Robert	Conference with R. Macias regarding Lahr affidavit in support of Petitioners' answer to Emergency Application and conferences with M. Hangley and E. Kagedan regarding strategy for oral argument.	1.2	378.00
	12/20/21	Kotula, Kathleen	Review Fulton County's response to emergency application	0.3	90.00
	12/20/21	Fischer, Michael	Review Fulton County Filing; correspond with counsel for members of Senate Intergovernmental Operations Committee regarding inspection	0.3	110.00
40113012	12/21/21	Hangley, Michele D.	Prepared for, mooted, attended Fulton argument; discussed follow up.	3.0	1,320.00
40113012	12/21/21	Kagedan, Eitan	Fulton County: Review argument outline.	0.7	0.00
40113012	12/21/21	Kagedan, Eitan	Fulton County: Appear for and follow up regarding oral argument on the Secretary's Emergency Application.	1.8	0.00
40113012	12/21/21	Wiygul, Robert	Fulton: Prepare for and participate in telephone argument on emergency application; follow-up conferences with client and team regarding same.	3.7	1,165.50
40113012	12/21/21	Wiygul, Robert	Fulton: Draft and revise outline for oral argument on emergency application to enjoin inspection.	3.5	1,102.50
40113012	12/21/21	Wiygul, Robert	Fulton: Conference with clients and OAG to prepare for oral argument on emergency application to enjoin inspection.	0.9	283.50
	12/21/21	Kotula, Kathleen	Attend meeting re prep for argument on emergency application	0.5	150.00
	12/21/21	Fischer, Michael	Participate in teleconference to prepare for argument; review court order	0.8	330.00
40113012	12/22/21	Hangley, Michele D.	Strategy and discussions with Dominion and Macias re protocol.	1.5	660.00
40113012	12/23/21	Hangley, Michele D.	Received, reviewed Macias draft report re inspection.	0.5	220.00
40113012	12/23/21	Wiygul, Robert	Telephone conference with K. Stimson (Dominion) regarding impending inspection of Fulton County voting equipment and Dominion's potential involvement; follow up conference with M. Hangley regarding strategy for negotiating inspection protocol.	0.8	252.00
40113012	12/24/21	Hangley, Michele D.	Discussed national press reports with Macias.	0.4	176.00
40113012	12/27/21	Hangley, Michele D.	Drafted protocol for Fulton inspection.	3.0	1,320.00
40113012	12/28/21	Hangley, Michele D.	Drafted protocol; discussed strategy for Fulton protective order.	2.0	880.00
40113012	12/28/21	Kagedan, Eitan	Fulton County: Call with Ryan Macias, Aimee Thomson, Michele Hangley, and Rob Wiygul concerning negotiation of protocol for Envoy Sage Inspection.	0.9	0.00
40113012	12/28/21	Kagedan, Eitan	Review and consider impact of correspondence regarding conversation with Dominion's outside counsel.	0.2	60.00
40113012	12/28/21	Wiygul, Robert	Conference with R. Macias regarding terms of proposed protocol governing inspection of Fulton voting machines and preparation and follow-up conferences with M. Hangley regarding same.	1.5	472.50
40113012	12/28/21	Wiygul, Robert	Fulton: Telephone calls and emails with outside counsel for Dominion regarding their potential intervention and follow up communications with M. Hangley and clients regarding same.	1.1	346.50
40113012	12/29/21	Hangley, Michele D.	Drafted protocol for Fulton January 10 inspection.	2.7	1,188.00
40113012	12/29/21	Hangley, Michele D.	Located and advised on applicability of models for Protective Order.	0.5	220.00
40113012	12/29/21	Hangley, Michele D.	Located and advised on applicability of models for Dominion intervention in Fulton County case.	0.5	220.00
40113012	12/29/21	Kagedan, Eitan	Fulton County: Review and comment on draft Inspection Protocol.	0.8	240.00
40113012	12/29/21	Kagedan, Eitan	Develop approach for and begin drafting Protective Order.	1.4	420.00
40113012	12/29/21	Wiygul, Robert	Review and comment on draft inspection protocol and email R. Macias and A. Thomson regarding same.	1.0	315.00

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113012	12/30/21	Hangley, Michele D.	Fulton: Protocol and protective order drafting.	1.5	660.00
40113012	12/30/21	Kagedan, Eitan	Draft Protective Order and review and comment on draft Protocol regarding Envoy Sage inspection.	3.2	960.00
40113012	12/30/21	Wiygul, Robert	Review and comment on draft Fulton inspection protocol and protective order and communications with team and clients regarding same; communications with Dominion's counsel regarding Dominion's possible intervention.	3.6	1,134.00
40113012	12/31/21	Hangley, Michele D.	Discussed potential intervention in Fulton County case with Dominion; sent protocol to King.	2.0	880.00
40113012	12/31/21	Kagedan, Eitan	Review revisions to draft Fulton protective order in advance of Envoy Sage inspection.	0.5	150.00
40113012	12/31/21	Wiygul, Robert	Communications with counsel for Dominion regarding their potential intervention in Fulton County case.	1.0	315.00
40113012	12/31/21	Wiygul, Robert	Review and analyze R. Macias's comments on draft protective order and email clients regarding same; revise protective order and emails with R. Macias regarding same.	0.9	283.50
	12/31/21	Kotula, Kathleen	Review draft inspection protocol and protective order	0.5	150.00
40113808	01/01/22	Wiygul, Robert	Fulton County: Email to clients regarding call with Dominion's counsel regarding possible intervention motion.	0.3	132.00
40113808	01/03/22	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding Dominion Motion to Intervene and plan next steps.	0.9	270.00
40113808	01/03/22	Wiygul, Robert	Fulton County: Telephone conference with K. Kotula regarding Buchanan's representation of Dominion and conference with E. Kagedan regarding immediate- and medium-term task lists (negotiation of protocol with Fulton County, drafting of potential motion for relief regarding inspection, etc.).	0.6	264.00
40113808	01/03/22	Wiygul, Robert	Fulton County: Review and analyze Dominion's motion to intervene and attachments and email clients and Dominion regarding same.	0.9	396.00
40113808	01/04/22	Kagedan, Eitan	Fulton County: Review, analyze, and plan response to Fulton County's proposed Inspection Protocol.	1.9	570.00
40113808	01/04/22	Kagedan, Eitan	Fulton County: Draft Motion for Entry of Order regarding Inspection Protocol.	1.4	420.00
40113808	01/04/22	Kagedan, Eitan	Fulton County: Develop strategy for negotiation of Inspection Protocol and for bringing disputes regarding the same before the court, particularly in light of Dominion's pending Motion to Intervene.	0.6	180.00
40113808	01/04/22	Wiygul, Robert	Fulton County: Review proposed inspection protocol and scope of inspection by Petitioners; communications with E. Kagedan, R. Macias, and clients regarding same.	1.4	616.00
40113808	01/04/22	Wiygul, Robert	Fulton County: Review order scheduling hearing on Dominion's application and communications with clients, team, and R. Macias regarding same.	0.4	176.00
40113808	01/04/22	Wiygul, Robert	Conference with S. Gallagher regarding evidentiary hearing on Dominion's application to intervene; emails to T. King and clients regarding Fulton County's recall of their proposed protocol.	0.6	264.00
	01/04/22	Kotula, Kathleen	Review T. King's proposed edits to inspection protocol	0.2	60.00
	01/04/22	Fischer, Michael	Review Fulton County's proposed inspection protocol	0.3	110.00
40113808	01/05/22	Kagedan, Eitan	Fulton County: Review and revise draft stipulations in advance of hearing on Dominion Motion to Intervene, including checking proposed stipulations against factual record.	1.4	420.00
40113808	01/05/22	Kagedan, Eitan	Fulton County: Draft letter to court regarding status of inspection protocol negotiations.	3.0	900.00

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/05/22	Kagedan, Eitan	Fulton County: Research regarding potential interlocutory appeal of adverse order on Dominion motion to intervene.	1.3	390.00
40113808	01/05/22	Kagedan, Eitan	Fulton County: Develop strategy and game plan for Dominion Motion to Intervene and inspection protocol negotiations.	1.0	300.00
40113808	01/05/22	Wiygul, Robert	Fulton County: Conference with clients regarding intervention hearing and inspection protocol negotiations and follow up conference with E. Kagedan regarding same.	0.7	308.00
40113808	01/05/22	Wiygul, Robert	Fulton County: Draft letter to Judge Leavitt seeking postponement of inspection and requirements in inspection protocol.	5.9	2,596.00
	01/05/22	Kotula, Kathleen	Attend meeting re Fulton inspection protocol	0.5	150.00
	01/05/22	Fischer, Michael	Participate in teleconference regarding inspection protocol	0.5	220.00
40113808	01/06/22	Ferrari, Kim	Fulton County: Edit answer; edit letter and exhibits; prepare for hearing.	4.0	600.00
40113808	01/06/22	Kagedan, Eitan	Fulton County: Draft, review, revise, and respond to comments on letter to court regarding status of inspection protocol negotiations and answer to Dominion Motion to Intervene.	4.0	1,200.00
40113808	01/06/22	Kagedan, Eitan	Fulton County: Research impact of Sunshine Act on court's ability to enjoin public meeting.	0.5	150.00
40113808	01/06/22	Wiygul, Robert	Fulton County: Finish drafting letter to Judge Leavitt seeking postponement of inspection and specific protocol terms; revise answer to Dominion's application to intervene.	2.1	924.00
40113808	01/06/22	Wiygul, Robert	Fulton County: Communications with team, parties, and clients regarding proposed stipulation of facts; communications with clients and team regarding answer to Dominion's application to intervene and letter to Court regarding status of negotiations over inspection protocol.	1.8	792.00
	01/06/22	Kotula, Kathleen	Review draft letter to court regarding negotiation of inspection protocol	0.1	30.00
	01/06/22	Kotula, Kathleen	Review T. King's additional proposed edits to inspection protocol	0.2	60.00
40113808	01/07/22	Ferrari, Kim	Coordinate logistics of recording Fulton County Inspection; watch hearing in prep for inspection; work on draft of potential King's Bench petition.	2.0	300.00
40113808	01/07/22	Kagedan, Eitan	Fulton County: Conduct final preparations for, attend, and conduct post mortem on hearing on Dominion Motion to Intervene and status conference on negotiation of inspection protocol.	4.8	1,440.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Prepare for and attend hearing and status conference and follow up communications with team, client, and OAG regarding same.	4.9	2,156.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Conference with counsel for Dominion regarding negotiation of protocol.	0.4	176.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Conference with clients and OAG regarding strategy following hearing.	0.9	396.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Conference with R. Macias regarding case status and draft inspection protocol.	0.8	352.00
	01/07/22	Kotula, Kathleen	Attend meeting re Fulton follow-up on hearing re Dominion motion to intervene and conference on inspection protocol	0.5	150.00
	01/07/22	Fischer, Michael	Participate in teleconference regarding litigation strategy	1.0	440.00
40113808	01/08/22	Kagedan, Eitan	Fulton County: Review and comment on draft inspection protocol and client update and strategy email memo.	1.7	510.00

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/08/22	Wiygul, Robert	Fulton County: Draft inspection protocol and communications with R. Macias and E. Kagedan regarding same; revise same and email clients regarding inspection protocol and related issues; review emails from other parties regarding negotiations.	8.2	3,608.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Conference with all parties regarding negotiation of inspection protocols.	1.3	390.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Follow up regarding conference with all parties regarding negotiation of inspection protocols.	0.8	240.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Review, revise, and comment on drafts of inspection protocol agreement.	1.7	510.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Review, revise, and comment on Emergency Application to Postpone Inspection Based on Expert Availability.	0.5	150.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding inspection protocol negotiations.	0.4	120.00
40113808	01/09/22	Wiygul, Robert	Fulton County: Draft and revise emergency application to reschedule inspection based on expert's unavailability.	1.6	704.00
40113808	01/09/22	Wiygul, Robert	Fulton County: Prepare for and participate in conference with parties regarding inspection protocols and follow-up conferences with E. Kagedan and OAG regarding same; revise summary of conference and email same to clients.	4.2	1,848.00
40113808	01/09/22	Wiygul, Robert	Fulton County: Revise proposed inspections protocol and communications with E. Kagedan, R. Macias, and clients regarding same.	2.2	968.00
	01/09/22	Kotula, Kathleen	Review new draft inspection protocol from T. King	0.3	90.00
	01/09/22	Kotula, Kathleen	Review draft of Secretary's inspection protocol	0.3	90.00
40113808	01/10/22	Kagedan, Eitan	Fulton County: Review, comment on, and draft response to Petitioners' proposal.	1.4	420.00
40113808	01/10/22	Kagedan, Eitan	Fulton County: Research issues related to viability and procedural requirements for permissive interlocutory appeal.	0.4	120.00
40113808	01/10/22	Kagedan, Eitan	Fulton County: Review and develop strategy related to correspondence regarding planned inspection.	1.8	540.00
40113808	01/10/22	Wiygul, Robert	Fulton County: Finalize and file emergency application to reschedule inspection based on expert's unavailability and call Prothonotary's Office regarding same; emails to clients regarding same.	0.5	220.00
40113808	01/10/22	Wiygul, Robert	Review and analyze revised inspection protocol proposal from Fulton County and communications with R. Macias, E. Kagedan, and clients regarding same.	1.0	440.00
40113808	01/10/22	Wiygul, Robert	Fulton County: Begin drafting letter to T. King regarding inspection protocol based on E. Kagedan's draft.	2.3	1,012.00
	01/10/22	Kotula, Kathleen	Review Petitioners' revised inspection protocol	0.2	60.00
40113808	01/11/22	Ferrari, Kim	Fulton County: Coordinate video for inspection; edit letter and pull exhibits to same.	2.0	300.00
40113808	01/11/22	Kagedan, Eitan	Fulton County: Draft Joint Status Report regarding status of negotiations and develop strategy regarding same.	1.5	450.00
40113808	01/11/22	Kagedan, Eitan	Fulton County: Review and revise letter to Tom King regarding inspection protocol negotiations.	3.0	900.00
40113808	01/11/22	Wiygul, Robert	Fulton County: Finish drafting letter to T. King regarding inspection protocol and email clients regarding same.	2.5	1,100.00
40113808	01/11/22	Wiygul, Robert	Conferences with clients, OAG, and SUDC regarding coordinating strategy in Fulton County and IOC subpoena cases.	1.4	616.00
40113808	01/11/22	Wiygul, Robert	Fulton County: Begin drafting Respondent's portion of joint status report.	2.0	880.00

Exhibit C - Expenditures of Legal-Professional Time
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HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/11/22	Wiygul, Robert	Fulton County: Revise letter to T. King regarding inspection protocols and communicate with clients, OAG, and R. Macias regarding same.	1.3	572.00
	01/11/22	Kotula, Kathleen	Review draft letter to T. King re latest protocol proposal (1/10/22)	0.2	60.00
40113808	01/12/22	Kagedan, Eitan	Fulton County: Draft sections of Renewed Emergency Application to Prohibit Inspection.	2.2	660.00
40113808	01/12/22	Kagedan, Eitan	Fulton County: Review letter from Tom King regarding inspection protocol negotiations.	0.1	30.00
40113808	01/12/22	Wiygul, Robert	Conferences with clients, SUDC, and OAG regarding IOC subpoena and Fulton County cases.	0.7	308.00
40113808	01/12/22	Wiygul, Robert	Fulton County: Develop E. Kagedan's draft of renewed emergency application to prohibit inspection.	0.6	264.00
	01/12/22	Boyer, Jacob	Review and edit Renewed Emergency Application to Prohibit Inspection and meetings about the same.	1.0	300.00
	01/12/22	Kotula, Kathleen	Review response letter from T. King	0.1	30.00
	01/12/22	Fischer, Michael	Call with R. Wiygul regarding litigation	0.3	110.00
40113808	01/13/22	Ferrari, Kim	Fulton County: Review status and coordinate details of video for inspection; prepare for inspection and work with R Wiygul; edit renewed emergency application and organize exhibits to same; redact cell phone numbers; cite check same.	4.0	600.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Draft Petition for Writ of Mandamus or Extraordinary Jurisdiction in anticipation of Commonwealth Court's not issuing an order prior to inspection.	3.9	1,170.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Draft, revise, and negotiate Joint Status Report.	1.1	330.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Conduct Meet and Confer with counsel for Fulton County regarding negotiation of inspection protocols.	0.2	60.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Review correspondence from Matt Haverstick.	0.1	30.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Review and revise Emergency Application.	2.2	660.00
40113808	01/13/22	Wiygul, Robert	Fulton County: Finish drafting and revise renewed emergency application for relief regarding inspection and Secretary's portion of joint status report and conference with clients and E. Kagedan regarding same.	6.3	2,772.00
40113808	01/13/22	Wiygul, Robert	Prepare for potential hearing before Judge Leavitt regarding Secretary's emergency applications for relief and the status of the parties' negotiations (including travel from Philadelphia to Fulton County to attend potential inspection).	4.5	1,980.00
	01/13/22	Kotula, Kathleen	Review draft renewed emergency application to enjoin inspection	0.3	90.00
	01/13/22	Kotula, Kathleen	Review Petitioners' response to renewed emergency application	0.2	60.00
40113808	01/14/22	Ferrari, Kim	Fulton County: Prepare for inspection and file emergency application to stay with SCOPA; travel to inspection and attend same.	8.0	1,200.00
40113808	01/14/22	Hunter, Maria	Fulton County: Research docket report to be included as exhibit to Notice of Appeal.	0.1	15.00
40113808	01/14/22	Hunter, Maria	Fulton County: Review and update Notice of Appeal.	0.2	30.00
40113808	01/14/22	Hunter, Maria	Fulton County: Review and update exhibits to Notice of Appeal and Jurisdictional Statement.	0.3	45.00
40113808	01/14/22	Kagedan, Eitan	Fulton County: Draft filings and manage tasks related to emergency application for stay to Pennsylvania Supreme Court, including jurisdictional statement and notice of appeal.	5.9	1,770.00

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/14/22	Wiygul, Robert	Fulton County: Prepare for potential hearing before Judge Leavitt on status of parties' negotiations; review and conference with clients and team regarding order denying emergency applications to prevent inspection from going forward; draft appeal papers and emergency application seeking stay from Pa. Supreme Court.	4.8	2,112.00
40113808	01/14/22	Wiygul, Robert	Attend public meeting in Fulton County; conferences with Pa. Supreme Court clerks and clients regarding order staying inspection; conference with R. Macias and Dominion's representatives about Fulton County proceedings (including return travel from Fulton County to Philadelphia)	4.7	2,068.00
	01/14/22	Boyer, Jacob	Review and edit emergency application to stay.	0.5	150.00
	01/14/22	Kotula, Kathleen	Review court order and memorandum opinion denying anti-spoliation application	0.3	90.00
	01/14/22	Kotula, Kathleen	Review draft SCOPA stay application	0.3	90.00
40113808	01/16/22	Wiygul, Robert	Fulton County: telephone conferences with E. Kagedan regarding strategy for Supreme Court filings and related research tasks.	1.4	616.00
40113808	01/17/22	Ferrari, Kim	Fulton County: Draft letter to court regarding appeal and send check for filing fee;	1.0	150.00
40113808	01/17/22	Kagedan, Eitan	Fulton County: Draft application and petition for permissive interlocutory review.	4.6	1,380.00
40113808	01/17/22	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding case status and Supreme Court's stay of inspection.	0.2	88.00
40113808	01/17/22	Wiygul, Robert	Fulton County: Telephone conference with K. Stimson regarding recent developments.	0.1	44.00
40113808	01/18/22	Ferrari, Kim	Fulton County: Draft letter to court regarding appeal filed; coordinate payment of appeal fees.	1.0	150.00
40113808	01/18/22	Kagedan, Eitan	Fulton County: Review and develop response to Petitioners' Response to Emergency Application for Stay.	0.9	270.00
40113808	01/18/22	Kagedan, Eitan	Fulton County: Revise and consider strategy regarding Motion for Permissive Interlocutory Appeal.	2.1	630.00
40113808	01/18/22	Kagedan, Eitan	Fulton County: Review, comment on, and draft sections of, Reply in Support of Emergency Stay.	1.9	570.00
40113808	01/18/22	Wiygul, Robert	Conference with clients, OAG, and SUDC regarding IOC subpoena and Fulton County cases.	0.3	132.00
40113808	01/18/22	Wiygul, Robert	Fulton County: Draft reply in support of SCOPA application for stay pending appeal.	6.8	2,992.00
	01/18/22	Kotula, Kathleen	Review Petitioners' answer to emergency application for stay of inspection (SCOPA)	0.2	60.00
40113808	01/19/22	Ferrari, Kim	Fulton County: Cite check and edit reply brief; gather key exhibits to same and file with SCOPA.	3.0	450.00
40113808	01/19/22	Kagedan, Eitan	Fulton County: Draft Response to Democratic Senators' Application to Participate.	0.4	120.00
40113808	01/19/22	Kagedan, Eitan	Fulton County: Draft, revise, and finalize Reply in support of SCOPA Emergency Application for Stay.	3.0	900.00
40113808	01/19/22	Kagedan, Eitan	Fulton County: Review filings ancillary to Emergency Application for Stay.	0.5	150.00
40113808	01/19/22	Wiygul, Robert	Fulton County: Finish drafting, revise, and file reply in support of SCOPA application for stay pending appeal; communications with team and clients regarding same.	7.6	3,344.00
	01/19/22	Kotula, Kathleen	Review draft reply ISO application for stay (SCOPA)	0.2	60.00
	01/19/22	Fischer, Michael	Review and edit reply brief in support of application for stay pending appeal	0.8	330.00
40113808	01/20/22	Ferrari, Kim	Fulton County: Edit, finalize and file with PAC File the application regarding amicus filing of IOC Democratic Senators.	1.0	150.00
40113808	01/20/22	Wiygul, Robert	Conference with clients and SUDC regarding status of and outlook for Fulton County case and IOC subpoena case.	0.2	88.00

Exhibit C - Expenditures of Legal-Professional Time
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HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/20/22	Wiygul, Robert	Fulton County: Review and revise response to Democrat Senators' amicus brief and communications with client regarding same; review order regarding response to Dominion's Jurisdictional Statement and communications with client regarding same.	0.8	352.00
40113808	01/21/22	Ferrari, Kim	Fulton County: Draft no answer letter and file same.	0.5	75.00
40113808	01/22/22	Wiygul, Robert	Fulton County: Review and analyze proposed amicus brief by Senators Corman and Dush and email clients and OAG regarding same.	0.9	396.00
40113808	01/23/22	Kagedan, Eitan	Fulton County: Review and analyze Corman/Dush Amicus Brief.	0.8	240.00
40113808	01/24/22	Kagedan, Eitan	Fulton County: Draft Response to Dush and Corman Amicus Application.	3.2	960.00
40113808	01/24/22	Wiygul, Robert	Fulton County: Review order regarding response to Senators' application for leave to file amicus brief and communicate with clients regarding same; communicate with E. Kagedan regarding draft response; review draft response.	0.7	308.00
40113808	01/25/22	Ferrari, Kim	Fulton County: Edit response to Dush application and submit same to court.	1.0	150.00
40113808	01/25/22	Kagedan, Eitan	Fulton County: Revise and finalize Opposition to Dush/Corman Amicus filing.	1.5	450.00
40113808	01/25/22	Wiygul, Robert	Fulton County: Revise response to application for leave to file amicus brief by Senators Dush and Corman.	2.7	1,188.00
	01/25/22	Fischer, Michael	Review and edit response to amicus brief submitted by Senators Dush & Corman	1.3	550.00
40113808	01/26/22	Kagedan, Eitan	Fulton County: Review court notices regarding appeal status.	0.2	60.00
40113808	01/27/22	Kagedan, Eitan	Fulton County: Review and circulate Orders.	0.2	60.00
40114406	02/02/22	Kagedan, Eitan	Fulton County: Draft preliminary sections of Opening SCOPA Brief.	1.0	300.00
40114406	02/05/22	Wiygul, Robert	Fulton County: Begin drafting opening appellate brief.	2.4	1,056.00
40114406	02/06/22	Wiygul, Robert	Fulton County: Continue drafting opening appellate brief.	2.2	968.00
40114406	02/10/22	Hunter, Maria	Fulton County: Review and identify pleadings in Commonwealth Court matter and start drafting Reproduced Record for SCOPA appeal.	4.2	630.00
40114406	02/11/22	Hunter, Maria	Fulton County: Review of Supreme Court and Commonwealth Court filings and continue identifying materials for inclusion in Reproduced Record.	4.7	705.00
40114406	02/13/22	Hunter, Maria	Fulton County: Continued review of pleadings and filings and identification of materials for inclusion in Reproduced Record.	1.3	195.00
40114406	02/14/22	Hunter, Maria	Fulton County: Review and update materials for potential inclusion in Reproduced Record.	1.2	180.00
40114406	02/14/22	Wiygul, Robert	Fulton County: Continue drafting opening appellate brief.	2.6	1,144.00
40114406	02/14/22	Wiygul, Robert	Fulton County: Review and comment on draft Reproduced Record.	0.6	264.00
40114406	02/15/22	Arteaga, Alexandra	Fulton County: Prepare two No Answer letters.	1.0	150.00
40114406	02/15/22	Hunter, Maria	Fulton County: Review and update Reproduced Record and Table of Contents to Reproduced Record.	6.6	990.00
40114406	02/15/22	Wiygul, Robert	Conference with OAG and clients regarding pending matters, including IOC subpoena case and Fulton County.	0.2	88.00
40114406	02/15/22	Wiygul, Robert	Fulton County: Finish drafting opening appellate brief.	6.3	2,772.00
40114406	02/15/22	Wiygul, Robert	Fulton County: Review draft reproduced record and email M. Hunter regarding same; continue drafting appellate brief.	4.1	1,804.00
	02/15/22	Kotula, Kathleen	Review draft SCOPA brief	0.5	150.00
40114406	02/16/22	Ferrari, Kim	Fulton County: Cite check and edit brief of appellant; finalize reproduced records and file with PAC File.	7.0	1,050.00
40114406	02/16/22	Hill, John	Fulton County: Revise appellate brief.	1.3	325.00

Exhibit C - Expenditures of Legal-Professional Time
[up to and through April 12, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40114406	02/16/22	Hunter, Maria	Fulton County: Review, update, and number Reproduced Record and Table of Contents to Reproduced Record.	1.2	180.00
40114406	02/16/22	Wiygul, Robert	Fulton County: Revise, finalize, and file initial appellate brief.	6.1	2,684.00
40115037	03/03/22	Kagedan, Eitan	Fulton County: Review and analyze Opening Appellate brief in preparation for drafting Reply Brief.	0.9	270.00
40115037	03/09/22	Kagedan, Eitan	Fulton County: Analyze Petitioners' SCOPA Response brief.	1.0	300.00
40115037	03/09/22	Kagedan, Eitan	Fulton County: Review Dominion appellate briefing.	0.7	210.00
	03/10/22	Kotula, Kathleen	Review Fulton County's answering brief (SCOPA)	0.3	90.00
40115037	03/11/22	Kagedan, Eitan	Fulton County: Research standard for prerogative appellate jurisdiction.	1.4	420.00
40115037	03/11/22	Kagedan, Eitan	Fulton County: Identify key points for SCOPA Reply brief, including review of Dominion appellate briefing and research regarding the presumption of validity afforded to administrative action.	4.1	1,230.00
40115037	03/11/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' answering brief in Supreme Court appeal; conference with E. Kagedan regarding strategy for reply brief.	0.9	396.00
40115037	03/14/22	Kagedan, Eitan	Fulton County: Draft outline of procedure and standards for permissive interlocutory appeal and prerogative interlocutory appeal.	1.6	480.00
40115037	03/16/22	Wiygul, Robert	Fulton County: Begin drafting SCOPA reply brief.	2.4	1,056.00
40115037	03/17/22	Wiygul, Robert	Fulton County: Continue drafting SCOPA reply brief.	4.7	2,068.00
40115037	03/18/22	Kagedan, Eitan	Fulton County: Review and revise SCOPA Reply brief.	1.6	480.00
40115037	03/18/22	Wiygul, Robert	Fulton County: Finish drafting SCOPA reply brief; revise same and email clients regarding same.	6.0	2,640.00
	03/18/22	Kotula, Kathleen	Review draft SCOPA reply brief	0.2	60.00
40115037	03/20/22	Kagedan, Eitan	Fulton County: Revise and discuss SCOPA Reply brief.	1.5	450.00
40115037	03/20/22	Wiygul, Robert	Fulton County: Review and analyze comments on SCOPA reply brief by OAG and E. Kagedan; emails and conference with E. Kagedan regarding revisions to same.	1.8	792.00
40115037	03/21/22	Arteaga, Alexandra	Fulton County: Review and analyze Reply Appellate Brief, check legal citations and quotations, and prepare tables of citations.	4.5	675.00
40115037	03/21/22	Kagedan, Eitan	Fulton County: Revise, finalize and manage filing of SCOPA Reply Brief.	2.8	840.00
40115037	03/21/22	Wiygul, Robert	Fulton County: Communications with E. Kagedan regarding client's comments on SCOPA reply brief and finalization of same.	0.3	132.00
40115037	03/23/22	Kagedan, Eitan	Fulton County: Review and revise letter to court with archival copy of SCOPA Reply brief.	0.2	60.00

<i>Fees incurred up to and through April 12, 2022</i>	388.8 \$	128,272.00
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Time Keeper	Hours	Amount
Hangley, Michele D.	23.60	\$ 10,384.00
Wiygul, Robert	174.20	\$ 71,473.00
Hill, John	1.30	\$ 325.00
Kagedan, Eitan	110.50	\$ 31,500.00
Fischer, Michael	5.00	\$ 2,200.00
Kotula, Kathleen	6.90	\$ 2,070.00
Boyer, Jacob	1.50	\$ 450.00
Arteaga, Alexandra	5.50	\$ 825.00
Ferrari, Kim	40.50	\$ 6,075.00
Hunter, Maria	19.80	\$ 2,970.00

EXHIBIT D

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40115643	04/19/22	Kagedan, Eitan	Fulton County: Review docket to confirm details surrounding Tom King's withdrawal of appearance.	0.2	60.00
40115643	04/19/22	Wiygul, Robert	Fulton County: Review praecipe to withdraw appearance of T. King's firm; emails with OAG regarding Fulton County meeting minutes indicating substitution of counsel; research Fulton County's presumptive new counsel (Lambert and Carroll), including federal court opinion sanctioning Lambert; email clients regarding same.	1.2	528.00
	04/19/22	Fischer, Michael	Review Fulton County Commissioners meeting minutes; research background of new counsel for Fulton County	0.5	220.00
40115643	04/21/22	Wiygul, Robert	Conference with clients, OAG, and SUDC regarding Fulton County's new counsel, Senator Dush's Right to Know requests, and related matters.	0.2	88.00
40116274	05/05/22	Wiygul, Robert	Weekly telephone conference with clients, OAG, and SUDC regarding proceedings against S. Lambert in Michigan and developments in related cases.	0.2	88.00
40116274	05/17/22	Wiygul, Robert	Fulton County: Review SCOPA order directing oral argument and email clients regarding same.	0.2	88.00
40116274	05/24/22	Wiygul, Robert	Fulton County: Prepare for and conference with clients regarding SCOPA briefing order and Commonwealth Court decision overruling preliminary objection.	0.2	88.00
40116916	06/09/22	Wiygul, Robert	Fulton County: Draft supplemental brief addressing appellate jurisdiction.	3.9	1,716.00
40116916	06/10/22	Wiygul, Robert	Fulton County: Continue drafting supplemental brief addressing appellate jurisdiction.	7.0	3,080.00
40116916	06/11/22	Wiygul, Robert	Fulton County: Finish drafting supplemental brief addressing appellate jurisdiction; emails to clients and team regarding same.	1.9	836.00
	06/12/22	Kotula, Kathleen	Review draft of supplemental SCOPA brief addressing SCOPA jurisdiction	0.3	90.00
40116916	06/13/22	Kagedan, Eitan	Fulton County: Review draft Supplemental Appellate Brief.	1.1	330.00
40116916	06/14/22	Hill, John	Fulton County: Implement client's revisions to supplemental brief regarding Supreme Court's jurisdiction.	0.9	225.00
40116916	06/14/22	Kagedan, Eitan	Fulton County: Review edits to Supplemental brief.	0.4	120.00
40116916	06/15/22	Arteaga, Alexandra	Fulton County: Review, analyze, and cite check SCOPA brief addressing appellate jurisdiction and prepare tale of authorities for attorney review.	2.6	390.00
40116916	06/15/22	Hill, John	Fulton County: Revise supplemental appellate brief.	0.6	150.00
40116916	06/16/22	Hill, John	Fulton County: Implement R. Wiygul's revisions to supplemental appellate brief.	0.6	150.00
40116916	06/16/22	Kagedan, Eitan	Fulton County: Finalize and manage filing of supplemental brief.	0.3	90.00
40116916	06/16/22	Wiygul, Robert	Fulton County: Finalize supplemental brief addressing appellate jurisdiction.	1.1	484.00
40116916	06/21/22	Arteaga, Alexandra	Fulton County: Review for filing today Brief addressing Appellate Jurisdiction with original signatures.	0.8	120.00
40116916	06/21/22	Kagedan, Eitan	Fulton County: Prepare corrected filing of supplemental brief.	0.7	210.00
40116916	06/28/22	Wiygul, Robert	Fulton County: Review entry of appearance by T. Carroll for Petitioners and emails with clients and A. Thompson regarding same.	0.3	132.00
40116916	06/30/22	Wiygul, Robert	Attend weekly conference with clients, OAG, SUDC, and J. Matz to discuss status of Fulton County case and related election-law proceedings.	0.1	44.00
40117516	07/05/22	Arteaga, Alexandra	Fulton County: Review and analyze docket report and circulate court imposed deadlines.	0.2	30.00
40117516	07/05/22	Wiygul, Robert	Fulton County: Review oral argument notice from SCOPA and email clients regarding same.	0.2	88.00
40117516	07/07/22	Wiygul, Robert	Weekly conference call with clients, OAG, SUDC, and J. Matz regarding status of Fulton County case and related election-law developments.	0.1	44.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40117516	07/15/22	Arteaga, Alexandra	Fulton County: Review and finalize for filing Acknowledgement of Argument Notice and circulate arguments dates internally.	0.7	105.00
40117516	07/15/22	Wiygul, Robert	Fulton County: Review supplemental disclosure statement by Justice Brobson and email clients regarding same.	0.3	132.00
40117516	07/20/22	Arteaga, Alexandra	Fulton County: Review and analyze docket report and circulate court imposed deadlines for attorney review.	0.3	45.00
40117516	07/20/22	Wiygul, Robert	Fulton County: Review letter from Prothonotary regarding appellees' overdue supplemental brief; email to clients regarding same.	0.3	132.00
40117516	07/21/22	Wiygul, Robert	Participate in weekly conference call with clients, OAG, and SUDC regarding Fulton County case and other matters.	0.1	44.00
40117516	07/21/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding case status, discovery strategy, and oral argument strategy.	0.3	132.00
40117516	07/26/22	Wiygul, Robert	Fulton County: Review letter to Petitioners' counsel from Prothonotary and email clients regarding same.	0.3	132.00
	07/26/22	Kotula, Kathleen	Review SCOPA correspondence re: Petitioner's failure to comply with notice to file supplemental brief	0.1	30.00
40117516	07/27/22	Wiygul, Robert	Fulton County: Email clients regarding recent filings and response to Petitioners' nunc pro tunc application for extension of time to file supplemental brief; conference with J. Hill regarding same.	0.4	176.00
	07/27/22	Kotula, Kathleen	Review Petitioners' application nunc pro tunc for additional time to file supplemental brief	0.1	30.00
40117516	07/28/22	Arteaga, Alexandra	Fulton County: Review and analyze court imposed deadlines and circulate updates record for attorney review.	0.3	45.00
40117516	07/28/22	Hill, John	Weekly conference with clients and election team co-counsel for update and strategy call regarding Fulton County case and other matters; follow-up conference with R. Wiygul regarding next steps.	0.1	44.00
40117516	07/28/22	Wiygul, Robert	Fulton County: Revise letter to Prothonotary responding to Petitioners' nunc pro tunc motion for extension of time to file supplemental appellate brief; email to clients regarding same.	0.2	88.00
40117516	07/28/22	Wiygul, Robert	Participate in weekly call with clients, OAG, SUDC, and J. Matz regarding Fulton County case and related matters; follow up call with J. Hill regarding next steps.	0.2	88.00
40117516	07/29/22	Arteaga, Alexandra	Fulton County: Review and finalize No Answer Letter to Motion Nunc Pro Tunc for Leave to File Appellees' Supplemental Brief.	0.3	45.00
	07/29/22	Kotula, Kathleen	Review draft no answer letter to Petitioners' application	0.1	30.00
40118122	08/10/22	Wiygul, Robert	Fulton County: Review letter from SCOPA Prothonotary to counsel for Petitioners; email to clients regarding same.	0.3	132.00
	08/10/22	Kotula, Kathleen	Review SCOPA letter to Petitioners' counsel	0.1	30.00
40118122	08/22/22	Wiygul, Robert	Fulton County: Telephone conference with B. Minner (Court Crier) regarding Supreme Court oral argument.	0.1	44.00
40118122	08/23/22	Wiygul, Robert	Fulton County: Review file and email A. Arteaga regarding creation of binder in preparation for oral argument.	1.1	484.00
40118122	08/24/22	Arteaga, Alexandra	Fulton County: Review and analyze materials for attorney review in preparation of upcoming oral argument.	0.4	60.00
40118763	09/01/22	Kagedan, Eitan	Fulton County: Plan and prepare for oral argument, including identification of key projects in advance of argument.	0.5	150.00
40118763	09/01/22	Kagedan, Eitan	Fulton County: Research caselaw supporting agency enjoining unauthorized conduct.	0.3	90.00
40118763	09/02/22	Kagedan, Eitan	Fulton County: Research issues related to forfeiture of argument on appeal.	0.5	150.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40118763	09/02/22	Wiygul, Robert	Fulton County: Emails with team and client regarding moot of oral argument; begin examining briefing in preparation for moot.	0.5	220.00
40118763	09/05/22	Aronchick, Mark A.	Fulton County: Reviewing briefs in preparation for moot court.	3.5	1,540.00
40118763	09/06/22	Aronchick, Mark A.	Fulton County: Continuing preparation for moot court.	1.3	572.00
40118763	09/07/22	Aronchick, Mark A.	Fulton County: Reading through briefs for meeting with R. Wiygul.	1.0	440.00
40118763	09/07/22	Arteaga, Alexandra	Fulton County: Review, analyze, and identify caselaw cited in briefing and prepare report for attorney review in preparation for oral argument.	1.5	225.00
40118763	09/07/22	Kagedan, Eitan	Fulton County: Review Commonwealth Court and Supreme Court briefing to prepare key case binder and develop questions for moot to assist in preparation for oral argument.	3.5	1,050.00
40118763	09/08/22	Aronchick, Mark A.	Fulton County: Preparation for and moot court of R. Wiygul.	0.3	132.00
40118763	09/08/22	Arteaga, Alexandra	Fulton County: Review, identify, and gather case law cited in briefing, as well as statutes and rules in preparation for upcoming oral argument.	0.8	120.00
40118763	09/08/22	Kagedan, Eitan	Fulton County: Prepare for oral argument.	0.7	210.00
40118763	09/09/22	Hill, John	Fulton County: Attend oral argument moot.	1.2	300.00
40118763	09/09/22	Kagedan, Eitan	Fulton County: Prepare for and participate in moot.	1.4	420.00
40118763	09/09/22	Wiygul, Robert	Fulton County: Prepare for and conduct moot of Supreme Court oral argument.	3.9	1,716.00
	09/09/22	Boyer, Jacob	Participate in moot of R. Wiygul for argument in Supreme Court.	1.5	450.00
	09/09/22	Kotula, Kathleen	Participate in moot for SCOPA Fulton argument	1.5	450.00
	09/09/22	Fischer, Michael	Participate in oral argument moot	1.0	440.00
40118763	09/12/22	Kagedan, Eitan	Fulton County: Review Motion to Continue Oral Argument and related communications.	0.2	60.00
40118763	09/13/22	Arteaga, Alexandra	Fulton County: Review correspondence received by the court in connection with oral argument scheduled for 10/26	0.2	30.00
40118763	09/19/22	Arteaga, Alexandra	Fulton County: Review oral-argument counsel designations for RAW and submit to the court ahead of the 10/26 oral argument.	0.4	60.00
40118763	09/21/22	Kagedan, Eitan	Fulton County: Review materials related to Speckin Inspection.	0.8	240.00
40118763	09/21/22	Kagedan, Eitan	Fulton County: Conduct research in support of agency's right to prospective injunctive relief.	0.3	90.00
40118763	09/21/22	Wiygul, Robert	Fulton County: Review Fulton County's complaint against Dominion and accompanying Speckin Forensics report; telephone conference with S. Gallagher (Dominion's counsel) regarding same.	0.9	396.00
40118763	09/23/22	Kagedan, Eitan	Fulton County: Confer with Ryan Macias regarding Speckin inspection.	0.5	150.00
40118763	09/23/22	Kagedan, Eitan	Fulton County: Confer with R. Wiygul regarding response to Speckin inspection.	0.6	180.00
40118763	09/23/22	Kagedan, Eitan	Fulton County: Confer with client team regarding response to Speckin inspection.	0.5	150.00
40118763	09/23/22	Wiygul, Robert	Conferences with R. Macias and clients regarding Fulton County's complaint against Dominion and related third-party inspection; telephone conference with E. Kagedan regarding next steps.	2.3	1,012.00
	09/23/22	Kotula, Kathleen	Attend meeting re Fulton follow-up on Speckin inspection	0.5	150.00
40118763	09/24/22	Mascioli, Gianni	Fulton County: Call R. Wiygul to discuss research needed for potential contempt motion.	0.4	100.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40118763	09/24/22	Mascioli, Gianni	Fulton County: Call R. Wiygul to discuss next steps and assistance needed with contempt motion.	0.4	100.00
40118763	09/26/22	Mascioli, Gianni	Fulton County: Research potential claims against opposing party in connection with potential contempt order.	0.8	200.00
40118763	09/26/22	Wiygul, Robert	Fulton County: Telephone conference with B. DeLone and S. Kirkpatrick regarding response to third-party inspection of voting machines; email to T. Gates regarding same.	0.4	176.00
40118763	09/27/22	Mascioli, Gianni	Fulton County: Research law governing civil contempt in Pennsylvania.	2.4	600.00
40118763	09/27/22	Mascioli, Gianni	Fulton County: Research law governing spoliation of evidence in Pennsylvania for potential contempt motion.	2.3	575.00
40118763	09/28/22	Kagedan, Eitan	Fulton County: Review research from Gianni Mascioli on standards for contempt and sanctions related to Speckin inspection in anticipation of drafting contempt motion.	0.9	270.00
40118763	09/28/22	Kagedan, Eitan	Fulton County: Draft Motion for Contempt.	1.2	360.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Draft memo to E. Kagedan and R. Wiygul summarizing research on civil contempt and spoliation of evidence.	1.8	450.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Call E. Kagedan to discuss additional research needed for contempt motion.	0.2	50.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Research compensatory remedies for civil contempt.	1.2	300.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Research remedies for litigation misconduct.	1.2	300.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Research authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.2	300.00
40118763	09/28/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding contempt application.	0.4	176.00
40118763	09/29/22	Kagedan, Eitan	Fulton County: Draft Motion for Contempt.	6.1	1,830.00
40118763	09/29/22	Kagedan, Eitan	Fulton County: Review research findings in support of Motion for Contempt.	0.5	150.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Continue researching authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.4	350.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Research Pennsylvania statutory and case law on available sanctions for preservation order violations.	1.7	425.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Prepare supplemental memo to E. Kagedan summarizing additional research on litigation misconduct and available sanctions therefor.	1.7	425.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Correspond further with E. Kagedan to elaborate on additional research in support of contempt motion.	0.3	75.00
40118763	09/30/22	Kagedan, Eitan	Fulton County: Complete and revise draft Motion for Contempt.	5.6	1,680.00
40119322	10/04/22	Kagedan, Eitan	Fulton County: Research to support executive agency's entitlement to prospective injunctive relief for Supreme Court oral argument.	1.3	390.00
40119322	10/06/22	Kagedan, Eitan	Fulton County: Reframe argument section of Motion for Contempt and Sanctions.	5.2	1,560.00
40119322	10/06/22	Mascioli, Gianni	Fulton County: Complete supplemental research on Pennsylvania courts' inherent authority to sanction violations of procedural and discovery orders to include in motion for contempt and sanctions.	1.3	325.00
40119322	10/06/22	Mascioli, Gianni	Fulton County: Draft section of motion for sanctions regarding Pennsylvania courts' inherent authority to sanction a party with dismissal with prejudice.	1.6	400.00
40119322	10/06/22	Mascioli, Gianni	Fulton County: Revise and line-edit introduction and contempt-related sections of draft motion for sanctions.	2.2	550.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/06/22	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher regarding Petitioners' Fulton County complaint against Dominion.	0.5	220.00
40119322	10/06/22	Wiygul, Robert	Fulton County: Telephone conference with Court Crier regarding upcoming oral argument; revise application to hold Petitioners in contempt.	0.8	352.00
40119322	10/07/22	Kagedan, Eitan	Fulton County: Draft Affidavit of Ryan Macias in support of Motion for Contempt.	1.2	360.00
40119322	10/07/22	Wiygul, Robert	Fulton County: Review draft of sanctions motion; research case law cited in same and additional case law regarding contempt and other authorities for sanctions; begin revising and supplementing contempt motion.	5.3	2,332.00
40119322	10/08/22	Wiygul, Robert	Fulton County: Continue revising and supplementing application to hold Petitioners in contempt.	13.8	6,072.00
40119322	10/09/22	Wiygul, Robert	Fulton County: Finish supplementing and revising motion for contempt and sanctions.	10.4	4,576.00
40119322	10/10/22	Wiygul, Robert	Fulton County: Further revise contempt application and email clients transmitting same.	0.6	264.00
40119322	10/12/22	Kagedan, Eitan	Fulton County: Review edits to Motion for Contempt and Sanctions.	0.7	210.00
40119322	10/12/22	Kagedan, Eitan	Fulton County: Consider additions and revisions to Motion for Contempt.	0.2	60.00
40119322	10/13/22	Kagedan, Eitan	Fulton County: Revise Macias declaration in support of Motion for Contempt.	1.2	360.00
40119322	10/13/22	Wiygul, Robert	Attend weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.2	88.00
	10/13/22	Boyer, Jacob	Attend weekly conference, which included discussion of Fulton County case and related matters.	0.2	60.00
	10/13/22	Mullen, Kathleen	Review and edit contempt application	1.5	450.00
40119322	10/14/22	Kagedan, Eitan	Fulton County: Review proposed edits and comments on Motion for Contempt.	0.4	120.00
	10/14/22	Kotula, Kathleen	Review draft contempt application	0.5	150.00
	10/15/22	Boyer, Jacob	Review and edit application to hold Petitioners in contempt	2.0	600.00
40119322	10/16/22	Wiygul, Robert	Fulton County: Revise application to hold Petitioners in contempt and support affidavit of R. Macias; email to R. Macias regarding same; draft verification of application.	4.3	1,892.00
40119322	10/17/22	Arteaga, Alexandra	Fulton County: Gather and review exhibits for Macias Affidavit in support of Motion for Contempt.	0.6	90.00
40119322	10/17/22	Wiygul, Robert	Fulton County: Review R. Macias's edits to affidavit in support of contempt application; videoconference with R. Macias regarding same; propose further revisions to affidavit and emails with R. Macias regarding same; emails with A. Arteaga regarding finalizing contempt motion for filing.	2.1	924.00
	10/17/22	Kotula, Kathleen	Review expert affidavit in support of contempt application	0.4	120.00
40119322	10/18/22	Arteaga, Alexandra	Fulton County: Review and revise exhibits re Motion for Sanctions.	0.5	75.00
40119322	10/18/22	Arteaga, Alexandra	Fulton County: Review and finalize for filing Motion for Sanctions and supporting exhibits.	0.9	135.00
40119322	10/18/22	Arteaga, Alexandra	Fulton County: Review and finalize verification re Motion for Sanctions.	0.2	30.00
40119322	10/18/22	Wiygul, Robert	Fulton County: Revise and finalize contempt application; communications with clients and A. Arteaga regarding same.	3.1	1,364.00
	10/18/22	Mullen, Kathleen	Review affidavit in support of contempt application	0.2	60.00
40119322	10/19/22	Kagedan, Eitan	Fulton County: Research on preemptive injunctive relief in preparation for Supreme Court oral argument.	0.7	210.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/20/22	Aronchick, Mark A.	Fulton County: Review previous filings in connection with possibly mooted next week's argument.	0.8	352.00
40119322	10/20/22	Kagedan, Eitan	Fulton County: Review Petitioners' submission in response to Application for Contempt.	0.2	60.00
40119322	10/20/22	Kagedan, Eitan	Fulton County: Prepare for Oral Argument on Appeal.	0.6	180.00
	10/20/22	Kotula, Kathleen	Review Petitioners' application for relief for extension of time	0.2	60.00
	10/20/22	Kotula, Kathleen	Review SCOPA order denying application for extension of time	0.1	30.00
40119322	10/21/22	Aronchick, Mark A.	Fulton County: Continued review of filings in connection with possibly mooted next week.	0.6	264.00
40119322	10/21/22	Kagedan, Eitan	Fulton County: Prepare for Oral Argument.	0.6	180.00
	10/21/22	Kotula, Kathleen	Review SCOPA order designating P.J. Cohn Jubelirer as Special Master	0.1	30.00
	10/21/22	Kotula, Kathleen	Review SCOPA order directing that appeal be submitted on briefs	0.1	30.00
40119322	10/24/22	Kagedan, Eitan	Fulton County: Develop discovery strategy for Motion for Contempt.	2.0	600.00
40119322	10/24/22	Kagedan, Eitan	Fulton County: Review and consider submission directed by Special Master's Scheduling Order.	2.3	690.00
40119322	10/24/22	Kagedan, Eitan	Fulton County: Draft memorandum of law on nature of contempt proceedings as requested by Special Master.	3.1	930.00
40119322	10/24/22	Mascioli, Gianni	Fulton County: Call E. Kagedan to discuss research questions to address ahead of scheduled hearing on motion for sanctions against opposing party.	0.1	25.00
40119322	10/24/22	Mascioli, Gianni	Fulton County: Prepare note to E. Kagedan summarizing certain research findings ahead of scheduled hearing on motion for sanctions against opposing party.	0.5	125.00
40119322	10/24/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding strategy and research for contempt proceeding; review Order by Special Master; email to clients regarding same; research contempt case law in preparation for drafting memorandum of law in compliance with Special Master's Order.	3.2	1,408.00
	10/24/22	Kotula, Kathleen	Review P.J. Cohn Jubelirer scheduling order	0.1	30.00
40119322	10/25/22	Kagedan, Eitan	Fulton County: Continue drafting memorandum of law on nature of contempt proceedings as requested by Special Master.	3.2	960.00
40119322	10/25/22	Kagedan, Eitan	Fulton County: Follow up research regarding anticipated issues in contempt proceedings.	0.8	240.00
40119322	10/25/22	Kagedan, Eitan	Fulton County: Draft discovery requests.	2.2	660.00
40119322	10/25/22	Wiygul, Robert	Fulton County: Telephone conference with A. Arteaga regarding prospective evidentiary hearing and obtaining subpoenas; email to Court staff regarding WebEx status conference; telephone conference with Dominion's outside counsel regarding status.	0.6	264.00
40119322	10/25/22	Wiygul, Robert	Fulton County: Revise memorandum of law required by October 24 Order.	1.4	616.00
649456	10/25/22	Mavroudis, Dimitri	Conference call with R. Wiygul regarding strategy related to Application for Contempt against Petitioner Fulton County.	0.4	176.00
	10/25/22	Boyer, Jacob	Review and edit memorandum of law in support application to hold Petitioners in contempt.	0.5	150.00
40119322	10/26/22	Arteaga, Alexandra	Fulton County: Review and cite check memo of law on nature of relief.	2.1	315.00
40119322	10/26/22	Arteaga, Alexandra	Fulton County: Review and analyze law on nature of relief, prepare Table of Authorities, and finalize for filing.	1.4	210.00
40119322	10/26/22	Arteaga, Alexandra	Fulton County: Review local rules re deposition subpoenas and contact the Commonwealth Court to obtain subpoenas.	0.6	90.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/26/22	Kagedan, Eitan	Fulton County: Review and edit Memorandum of Law concerning nature of relief sought.	1.9	570.00
40119322	10/26/22	Kagedan, Eitan	Fulton County: Review filings related to Motion for Contempt in preparation for discovery.	1.0	300.00
40119322	10/26/22	Wiygul, Robert	Fulton County: Revise and supplement memorandum of law required by October 24 Order; review comments by clients and OAG and further revise; finalize and file memorandum of law; review and analyze Petitioners' Answer to contempt application and memorandum of law regarding civil v. criminal contempt; emails to clients and R. Macias regarding same.	10.0	4,400.00
649456	10/26/22	Mavroudis, Dimitri	Review Respondent's Memorandum of Law on Nature for Relief in connection with the Application for Contempt against Petitioner Fulton County.	1.0	440.00
	10/26/22	Kotula, Kathleen	Review draft memorandum of law re nature of relief sought	0.3	90.00
	10/26/22	Mullen, Kathleen	Review draft brief re nature of relief sought	0.3	90.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Revise discovery requests in support of Motion for Contempt.	1.0	300.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Research concerning limits to scope of contempt proceedings and procedural requirements in preparation for status conference.	1.9	570.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Meet with client team to discuss issues related to Motion for Contempt.	0.8	240.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Prepare for, attend, and follow up regarding status conference on Motion for Contempt.	2.5	750.00
40119322	10/27/22	Mascioli, Gianni	Fulton County: Prepare note to E. Kagedan summarizing additional research findings ahead of hearing before Special Master.	0.6	150.00
40119322	10/27/22	Wiygul, Robert	Fulton County: Conference with clients and OAG in preparation for status conference; follow-up conference with E. Kagedan regarding same.	0.8	352.00
40119322	10/27/22	Wiygul, Robert	Fulton County: Prepare for and participate in status conference; follow-up conferences with E. Kagedan and R. Macias regarding scheduling and discovery issues; emails with Petitioners' counsel regarding scheduling issues.	3.0	1,320.00
40119322	10/27/22	Wiygul, Robert	Fulton County: Revise draft document requests relating to contempt proceeding.	1.0	440.00
949456	10/27/22	Mavroudis, Dimitri	Attend conference call with R. Wiygul and client regarding discovery strategy for Application for Contempt against Petitioner Fulton County and Court status conference.	0.6	264.00
949456	10/27/22	Mavroudis, Dimitri	Observe and take notes at virtual Court status conference.	0.6	264.00
949456	10/27/22	Mavroudis, Dimitri	Review correspondence from R. Wiygul regarding proposed discovery schedule.	0.5	220.00
949456	10/27/22	Mavroudis, Dimitri	Review Petitioners Memorandum of Law and Answer to Application for Contempt.	0.8	352.00
	10/27/22	Boyer, Jacob	Conference to prepare for status conference; attend status conference.	2.0	600.00
	10/27/22	Kotula, Kathleen	Attend meeting re strategy for Fulton hearing	0.5	150.00
	10/27/22	Kotula, Kathleen	Review Petitioners' filings (answer and brief)	0.4	120.00
	10/27/22	Kotula, Kathleen	Review draft email to Petitioners' counsel re: discovery/proceedings schedule	0.2	60.00
	10/27/22	Fischer, Michael	Call with R. Wiygul; participate in teleconference regarding legal strategy; review draft schedule; correspond with client and outside attorneys regarding strategy	1.5	660.00
40119322	10/28/22	Arteaga, Alexandra	Fulton County: Review and analyze Proposed Scheduling Order and finalize for filing	0.7	105.00
40119322	10/28/22	Arteaga, Alexandra	Fulton County: Review and analyze discovery requests and draft cover letter for service of the same.	0.2	30.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/28/22	Hunter, Maria	Fulton County: Review Order regarding Rule to Show Cause hearing and update matter calendar.	0.1	15.00
40119322	10/28/22	Hunter, Maria	Fulton County: Review communications from counsel regarding court requirements regarding transcript for hearing and communications with court reporters regarding availability.	0.2	30.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Call with opposing counsel concerning scheduling issue; draft proposed scheduling order.	2.8	840.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Draft proposed factual stipulations.	3.3	990.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Research concerning potential privilege claims by Petitioners.	0.8	240.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Review Special Master's scheduling order and related communications.	0.4	120.00
40119322	10/28/22	Wiygul, Robert	Fulton County: Prepare for and conduct telephone conference with counsel for Petitioners and Intervenor regarding schedule; draft submission to Special Master regarding same; communications with clients regarding same; review Petitioners' submission and email clients regarding same; revise document requests and communicate with clients regarding same; finalize and serve document requests; review scheduling Order entered by Court and communicate with clients regarding same; serve Order on Petitioners' counsel and draft and file proof of service.	7.8	3,432.00
649456	10/28/22	Mavroudis, Dimitri	Attend conference call with opposing counsel and counsel for Dominion regarding meet and confer relates to discovery prior to hearing on the Application for Contempt against Petitioner Fulton County.	1.0	440.00
649456	10/28/22	Mavroudis, Dimitri	Review Requests for Documents in support of Application for Contempt against Petitioner Fulton County.	0.7	308.00
649456	10/28/22	Mavroudis, Dimitri	Review the Secretary's Proposed Schedule.	0.3	132.00
649456	10/28/22	Mavroudis, Dimitri	Review Propose Schedule Submission to the Court.	0.7	308.00
649456	10/28/22	Mavroudis, Dimitri	Review Court Order setting schedule for discovery to be taken in advance of the hearing regarding the Application for Contempt against Petitioner Fulton County.	0.4	176.00
	10/28/22	Kotula, Kathleen	Review draft proposed schedule	0.2	60.00
	10/28/22	Kotula, Kathleen	Review Petitioners' filing re discovery and schedule	0.2	60.00
	10/28/22	Kotula, Kathleen	Review draft requests for production of documents	0.3	90.00
	10/28/22	Kotula, Kathleen	Review court order re scheduling	0.1	30.00
	10/28/22	Fischer, Michael	Correspond with client regarding strategy; calls with client and outside attorneys regarding upcoming hearing	0.5	220.00
40119322	10/29/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' contempt-related filings to develop discovery requests and rebuttal arguments.	2.5	1,100.00
40119322	10/30/22	Hunter, Maria	Fulton County: Review correspondence from counsel regarding depositions.	0.1	15.00
40119322	10/30/22	Hunter, Maria	Fulton County: Communications with Court Reporting Agency scheduling videographer, court reporter and exhibit technician for remote depositions.	0.3	45.00
40119322	10/30/22	Hunter, Maria	Fulton County: Draft Notice of Remote Video Deposition directed to S. Ulsh pursuant to Pennsylvania rules.	0.5	75.00
40119322	10/30/22	Kagedan, Eitan	Fulton County: Complete drafts of Interrogatories and Requests for Admission.	1.8	540.00
40119322	10/30/22	Wiygul, Robert	Fulton County: Draft and revise interrogatories and requests for admission and research anticipated privilege issues; communications with E. Kagedan regarding interrogatories and requests for admission.	6.2	2,728.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/30/22	Wiygul, Robert	Fulton County: Email M. Hunter regarding video deposition notices directed to Commissioners; telephone conferences with E. Kagedan regarding next steps in assembling interrogatories and requests for admissions and strategy for responding to Petitioners' anticipated objections; revise deposition notice and communicate with M. Hunter regarding same.	1.4	616.00
	10/30/22	Boyer, Jacob	Review and edit discovery.	0.5	150.00
40119322	10/31/22	Hunter, Maria	Fulton County: Various communications with Frontino Reporting regarding deposition and hearing logistics.	0.3	45.00
40119322	10/31/22	Hunter, Maria	Fulton County: Review, update, finalize and submit Notices of Remote Video depositions directed to S. Ulsh, P. Shives and R. Bunch.	1.1	165.00
40119322	10/31/22	Hunter, Maria	Fulton County: Review, update, and finalize discovery requests.	0.8	120.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Draft responses to Fulton County's written discovery requests.	4.8	1,440.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Review, revise, and finalize Interrogatories, Requests for Admission, and Proposed Deposition Questions.	2.5	750.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Review and consider responses to Fulton County's discovery requests to Dominion and the Secretary.	1.8	540.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Research to support motion to compel discovery.	0.6	180.00
40119322	10/31/22	Wiygul, Robert	Fulton County: Telephone conference with R. Macias regarding Petitioners' discovery requests and schedule for preparing for evidentiary hearing.	0.4	176.00
40119322	10/31/22	Wiygul, Robert	Fulton County: Revise, supplement, and finalize interrogatories, requests for admission, proposed deposition questions, and notices of deposition directed to Fulton County Commissioners; communications with clients and E. Kagedan regarding same; review emails from "AttorneyLambert" email address purporting to contain discovery requests and analyze same; communications with clients and E. Kagedan regarding same.	6.9	3,036.00
	10/31/22	Kotula, Kathleen	Review draft discovery documents (depositions, admissions, interrogatories)	0.3	90.00
	10/31/22	Kotula, Kathleen	Review Petitioners' discovery requests	0.5	150.00
	10/31/22	Mullen, Kathleen	Reviewed discovery requests	0.3	90.00
	10/31/22	Fischer, Michael	Review and edit discovery requests	0.5	220.00
40119467	11/01/22	Hunter, Maria	Fulton County: Various communications with Frontino Reporting regarding court reporter for evidentiary hearing.	0.2	30.00
40119467	11/01/22	Hunter, Maria	Fulton County: Draft Notices to Attend directed to R. Bunch, S. Ulsh and P. Shives.	0.2	30.00
40119467	11/01/22	Kagedan, Eitan	Fulton County: Draft responses to Petitioners' Interrogatories and Requests for Admission.	2.8	840.00
40119467	11/01/22	Kagedan, Eitan	Fulton County: Develop strategy for completing discovery and litigating discovery issues.	0.4	120.00
40119467	11/01/22	Kagedan, Eitan	Fulton County: Draft Motion to Compel Deposition Appearances.	3.2	960.00
40119467	11/02/22	Hunter, Maria	Fulton County: Prepare copies of exhibits for potential use at hearing.	1.4	210.00
40119467	11/02/22	Hunter, Maria	Fulton County: Review, update, and finalize Secretary's Responses and Objections to Petitioners' Requests for Discovery.	0.7	105.00
40119467	11/02/22	Hunter, Maria	Fulton County: Review, update, finalize and file Entry of Appearance of E. Kagedan.	0.4	60.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/02/22	Hunter, Maria	Fulton County: Communications with Pennsylvania Supreme Court regarding E. Kagedan's Entry of Appearance.	0.2	30.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Revise and finalize written discovery responses.	1.4	420.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Review and analyze Petitioners' Application for Injunction and plan response.	3.3	990.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Draft and revise verifications for filings.	0.3	90.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Research concerning scope and contours of deliberative process privilege in response to Petitioners' filings.	0.5	150.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Revise Motion to Compel Deposition Appearances per R. Wiygul's comments.	2.1	630.00
40119467	11/02/22	Wiygul, Robert	Fulton County: Review and analyze SCOPA order referring Petitioners' application to enjoin discovery to Special Master and consider next steps; email clients regarding same.	0.6	264.00
40119467	11/02/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding SCOPA order reimposing discovery schedule and next steps.	0.3	132.00
40119467	11/02/22	Wiygul, Robert	Fulton County: Review and revise draft responses to Petitioners' discovery responses; finalize and serve requests; review and analyze Petitioners' emergency application to enjoin discovery and email clients regarding same; review Justice Wecht's order temporarily enjoining discovery and email clients regarding same.	4.1	1,804.00
649606	11/02/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding preparation for evidentiary hearing related to the Secretary's application for contempt.	0.1	44.00
	11/02/22	Kotula, Kathleen	Review draft responses and objections to Petitioners' discovery requests	0.3	90.00
	11/02/22	Kotula, Kathleen	Review Petitioners' application for relief re discovery	0.3	90.00
	11/02/22	Kotula, Kathleen	Review Justice Wecht order re administrative stay	0.1	30.00
	11/02/22	Kotula, Kathleen	Review SCOPA order re deadlines	0.1	30.00
	11/02/22	Fischer, Michael	Review and edit motion to compel	0.3	110.00
40119467	11/03/22	Hunter, Maria	Fulton County: Review, update, finalize and file Motion to Compel Depositions and prepare exhibits in support.	2.2	330.00
40119467	11/03/22	Hunter, Maria	Fulton County: Various communications with counsel and Court Reporting Agency regarding depositions.	1.3	195.00
40119467	11/03/22	Hunter, Maria	Fulton County: Various communications with Frontino regarding court reporter for evidentiary hearing.	0.3	45.00
40119467	11/03/22	Hunter, Maria	Fulton County: Review, update, and finalize Notice to the Court regarding Petitioners' Response and Objections to the Secretary's discovery.	0.6	90.00
40119467	11/03/22	Hunter, Maria	Fulton County: Review and update documents designated for potential use at evidentiary hearing.	1.6	240.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Review and incorporate revisions to motion to compel depositions.	1.6	480.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Review strategy notes for upcoming status conference.	0.2	60.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Continue researching contours of deliberative process privilege in response to Petitioners' filings.	1.1	330.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Review Petitioners' responses to the Secretary's discovery requests and draft notice concerning deficiencies.	1.3	390.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Identify and prepare exhibits for evidentiary hearing.	2.8	840.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/03/22	Kagedan, Eitan	Fulton County: Draft application for discovery sanctions.	4.3	1,290.00
40119467	11/03/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' discovery responses; conference with E. Kagedan regarding Notice to the Court; revise Notice to Court and email clients regarding same; review Special Master's Order; emails with clients regarding same; revise and serve Notices to Attend the evidentiary hearing and email clients regarding same.	1.8	792.00
40119467	11/03/22	Wiygul, Robert	Fulton County: Revise verifications of discovery responses and email clients regarding same; revise motion to compel depositions and email clients regarding same.	2.1	924.00
649606	11/03/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding attendance at hearing before the Special Master.	0.1	44.00
649606	11/03/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding Special Master Order for discovery and status conference attendance.	0.2	88.00
649606	11/03/22	Mavroudis, Dimitri	Review and analyze Special Master's Order regarding pre-hearing discovery.	0.6	264.00
649606	11/03/22	Mavroudis, Dimitri	Review motion to compel depositions of Commissioners Ulsh, Bunch, and Shives.	0.6	264.00
649606	11/03/22	Mavroudis, Dimitri	Review Petitioners Objections and Responses to written discovery requests.	0.8	352.00
	11/03/22	Mullen, Kathleen	Review draft motion to compel depositions	0.1	30.00
	11/03/22	Kotula, Kathleen	Review draft notice re Petitioners' responses and objections to discovery	0.3	90.00
	11/03/22	Kotula, Kathleen	Review court order re Secretary's emergency application to compel	0.1	30.00
40119467	11/04/22	Hunter, Maria	Fulton County: Review Commonwealth Court protocols for Court Reporters, and communications with counsel and Agency regarding same.	0.9	135.00
40119467	11/04/22	Hunter, Maria	Fulton County: Coordinate tech systems for Status Conference call with Court.	0.3	45.00
40119467	11/04/22	Hunter, Maria	Fulton County: Review, update, finalize and file Application for Discovery Sanctions.	1.3	195.00
40119467	11/04/22	Hunter, Maria	Fulton County: Communications with Court Reporter and counsel regarding Telephonic Status Conference.	0.2	30.00
40119467	11/04/22	Kagedan, Eitan	Fulton County: Continue drafting application for discovery sanctions.	4.7	1,410.00
40119467	11/04/22	Kagedan, Eitan	Fulton County: Review Petitioners' filing Motion for Predicate Legal Rulings and prepare for status conference.	4.1	1,230.00
40119467	11/04/22	Wiygul, Robert	Fulton County: Prepare for and attend status conference; communications with J. Boyer and E. Kagedan regarding next steps; email to clients regarding status conference.	1.8	792.00
40119467	11/04/22	Wiygul, Robert	Fulton County: Revise and supplement motion for discovery sanctions and communicate with E. Kagedan and clients regarding same.	1.8	792.00
40119467	11/04/22	Wiygul, Robert	Fulton County: Review and analyze order from Special Master and email clients regarding same.	0.4	176.00
	11/04/22	Boyer, Jacob	Attend status conference; conference with co-counsel about next steps.; review and edit motion for sanctions.	2.0	600.00
	11/04/22	Kotula, Kathleen	Review court order re objections to discovery and sanctions	0.1	30.00
	11/04/22	Mullen, Kathleen	Review motion for discovery sanctions	0.1	30.00
	11/04/22	Fischer, Michael	Correspond with client and outside counsel regarding strategy; calls with client and outside counsel; review Special Master order	0.5	220.00
40119467	11/05/22	Hunter, Maria	Fulton County: Review Order issued post-Status Conference and coordinate Court Reporting services for depositions.	0.5	75.00

Exhibit D - Expenditures of Legal-Professional Time
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HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/05/22	Hunter, Maria	Fulton County: Review and update documents for potential use at Evidentiary Hearing.	0.5	75.00
40119467	11/05/22	Kagedan, Eitan	Fulton County: Draft outline for examination of expert witness Ryan Macias.	2.6	780.00
40119467	11/05/22	Wiygul, Robert	Fulton County: Emails and telephone conference with R. Macias regarding logistics and substance of testimony at evidentiary hearing.	0.5	220.00
40119467	11/05/22	Wiygul, Robert	Fulton County: Review and analyze potential deposition and hearing exhibits in preparation for depositions and hearings and filing of exhibit list.	2.2	968.00
40119467	11/06/22	Kagedan, Eitan	Fulton County: Finish drafting expert examination outline and videoconference with Ryan Macias to prepare for hearing.	6.0	1,800.00
40119467	11/06/22	Kagedan, Eitan	Fulton County: Identify and prepare additional exhibits for evidentiary hearing.	1.6	480.00
40119467	11/06/22	Wiygul, Robert	Fulton County: Review outline of R. Macias examination; conference with R. Macias regarding testimony at evidentiary hearing; conference with E. Kagedan regarding revisions to outline of R. Macias examination.	1.7	748.00
40119467	11/07/22	Hill, John	Fulton County: Revise response in opposition to Petitioners' emergency application for injunction filed in Pa. Supreme Court.	0.5	125.00
40119467	11/07/22	Hunter, Maria	Fulton County: Various communications with Frontino regarding Court Reporter for Evidentiary Hearing.	0.2	30.00
40119467	11/07/22	Hunter, Maria	Fulton County: Review of transcript of November 4 Status Conference.	0.2	30.00
40119467	11/07/22	Hunter, Maria	Fulton County: Review of Pa. Supreme Court Letter scheduling deadline for Response to Petitioners' Emergency Application for injunction.	0.1	15.00
40119467	11/07/22	Hunter, Maria	Fulton County: Review and update list of Secretary's Hearing Exhibits.	0.7	105.00
40119467	11/07/22	Kagedan, Eitan	Fulton County: Draft Exhibit and Witness List.	1.0	300.00
40119467	11/07/22	Kagedan, Eitan	Fulton County: Prepare for examination of R. Macias and videoconference with R. Macias regarding same.	2.5	750.00
40119467	11/07/22	Wiygul, Robert	Conference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	0.2	88.00
40119467	11/07/22	Wiygul, Robert	Fulton County: Videoconference with R. Macias to prepare for hearing testimony; conference with E. Kagedan regarding revisions to witness and exhibit lists and estimate of time needed to present case.	1.4	616.00
	11/07/22	Boyer, Jacob	Conference with co-counsel; review and edit application for relief.	1.0	300.00
	11/07/22	Kotula, Kathleen	Review draft answer in opposition to emergency application to enjoin depositions	0.3	90.00
	11/07/22	Kotula, Kathleen	Review draft application for contempt	0.4	120.00
	11/07/22	Mullen, Kathleen	Draft declaration for J. Marks in response to allegations in Petitioners' Emergency Application for Relief	0.4	120.00
	11/07/22	Mullen, Kathleen	Review answer in opposition to Petitioners' Emergency Application for Relief	0.2	60.00
	11/07/22	Mullen, Kathleen	Review and edit application for contempt for violation of Special Master's Order	0.2	60.00
	11/07/22	Fischer, Michael	Review contempt motion; teleconference with client and outside counsel regarding upcoming hearing	0.5	220.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file The Secretary's Exhibit and Witness List.	0.6	90.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review and update exhibits and other materials for potential use at hearing.	1.6	240.00
40119467	11/08/22	Hunter, Maria	Fulton County: Communications with Clerk of Court regarding exhibit assembly and presentation preference.	0.1	15.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/08/22	Hunter, Maria	Fulton County: Prepare archival paper copies of Secretary's filings since October 21, 2022 for delivery to Commonwealth Court.	0.5	75.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Application for Relief Concerning Evidentiary Hearing.	0.8	120.00
40119467	11/08/22	Hunter, Maria	Prepare trial notebook for evidentiary hearing at counsel's direction.	1.4	210.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review and update hearing outline for examination of Commissioners with references to hearing exhibits.	1.2	180.00
40119467	11/08/22	Hunter, Maria	Fulton County: Travel from Narberth to Harrisburg for evidentiary hearing.	1.5	225.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Prepare for evidentiary hearing, including review of examination outlines, preparation of documentary materials.	5.0	1,500.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Manage filing of exhibit and witness lists and preparation of copies of exhibits for evidentiary hearing.	1.4	420.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Draft Applications for order requiring Petitioners' counsel to verify that Commissioners have been provided with Notices to Attend evidentiary hearing and related orders.	0.8	240.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Research issues related to Petitioners' Motion to Suspend Proceedings.	0.4	120.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Travel to Harrisburg.	2.0	600.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Analyze exhibits to identify those for which to seek lay foundation and admission at evidentiary hearing.	0.4	120.00
40119467	11/08/22	Wiygul, Robert	Fulton County: Attend conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40119467	11/08/22	Wiygul, Robert	Fulton County: Revise application for relief regarding evidentiary hearing and email clients regarding same.	0.9	396.00
40119467	11/08/22	Wiygul, Robert	Fulton County: Review potential exhibits and examination outline and conference with team in preparation for evidentiary hearing (including travel between Philadelphia and Harrisburg).	3.5	1,540.00
	11/08/22	Boyer, Jacob	Conference with co-counsel, which included discussion of Fulton County case.	0.1	30.00
649606	11/08/22	Mavroudis, Dimitri	Review outline for the examination of Fulton County Commissioner witnesses.	0.8	352.00
	11/08/22	Kotula, Kathleen	Review Petitioners' answer to application for contempt	0.3	90.00
	11/08/22	Kotula, Kathleen	Review draft supplemental application for sanctions	0.3	90.00
	11/08/22	Kotula, Kathleen	Review court order denying Petitioners' application for relief	0.1	30.00
	11/08/22	Mullen, Kathleen	Review answer to application for contempt	0.1	30.00
	11/08/22	Fischer, Michael	Correspond with client and outside counsel regarding hearing; review Special Master order; review draft application regarding notice to Fulton County witnesses; review answer filed by Fulton County	1.0	440.00
	11/08/22	Fischer, Michael	Correspond with client and outside counsel regarding possible bench warrants; research statute addressing immunity from prosecution for election officials	0.5	220.00
40119467	11/09/22	Hunter, Maria	Plan for and attend Evidentiary Hearing on Application for Contempt.	10.0	1,500.00
40119467	11/09/22	Kagedan, Eitan	Fulton County: Prepare, appear for, and follow up regarding evidentiary hearing.	10.5	3,150.00
40119467	11/09/22	Wiygul, Robert	Fulton County: Prepare for and participate in evidentiary hearing; conference with co-counsel regarding strategy; conference with R. Macias regarding expert testimony.	10.9	4,796.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
649606	11/09/22	Mavroudis, Dimitri	Travel to and attend evidentiary hearing in Harrisburg before the Special Master regarding the Secretary of the Commonwealth's Application for Contempt.	13.0	5,720.00
40119467	11/10/22	Hunter, Maria	Fulton County: Plan for and attend second day of Evidentiary Hearing.	11.5	1,725.00
40119467	11/10/22	Hunter, Maria	Fulton County: Travel from Harrisburg to Narberth following evidentiary hearing.	1.8	270.00
40119467	11/10/22	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning Evidentiary Hearing (including travel from Harrisburg to Philadelphia).	14.0	4,200.00
40119467	11/10/22	Wiygul, Robert	Fulton County: Prepare for and attend second day of evidentiary hearing (including travel from Harrisburg to Philadelphia).	13.1	5,764.00
649606	11/10/22	Mavroudis, Dimitri	Observe via webcast evidentiary hearing in Harrisburg before the Special Master regarding the Secretary of the Commonwealth's Application for Contempt.	2.8	1,232.00
40119467	11/11/22	Hill, John	Fulton County: Research and analyze issues arising during contempt hearing regarding ultra vires actions of Commissioners Ulsh and Bunch in preparation for drafting post-hearing submission.	2.5	625.00
40119467	11/11/22	Hunter, Maria	Fulton Hearing: Post-Hearing organization of materials used at hearing in Harrisburg.	0.5	75.00
40119467	11/11/22	Hunter, Maria	Fulton County: Communications with Frontino Reporting regarding Court Reporter and exhibit tech for continued Evidentiary Hearing, scheduled for Monday, November 14, 2022.	0.4	60.00
40119467	11/11/22	Hunter, Maria	Fulton County: Review of Court Orders regarding continued Evidentiary Hearing and regarding preservation of key access log document.	0.2	30.00
40119467	11/11/22	Hunter, Maria	Fulton County: Upload the Secretary's hearing exhibits to Court's site for continued hearing.	0.1	15.00
40119467	11/11/22	Kagedan, Eitan	Fulton County: Begin drafting Proposed Findings of Fact.	6.8	2,040.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Telephone conference with M. Fischer regarding evidentiary hearing and next steps.	0.3	132.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Telephone conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.3	132.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Email court staff regarding access needed to upload exhibits and need for trial tech; email R. Macias following up on hearing.	0.3	132.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Begin reviewing and annotating hearing transcripts in preparation for drafting post-hearing submission; research case law regarding Fifth Amendment and adverse-inference issues to address in post-hearing submission.	5.1	2,244.00
	11/11/22	Fischer, Michael	Teleconference with client and outside counsel regarding hearing	0.5	220.00
40119467	11/12/22	Kagedan, Eitan	Fulton County: Continue drafting Proposed Findings of Fact.	4.4	1,320.00
40119467	11/12/22	Wiygul, Robert	Fulton County: Continue reviewing and annotating hearing transcripts in preparation for drafting post-hearing brief and conference with E. Kagedan regarding draft of proposed findings of fact; research implications of voting-machine inspections' having been conducted without a vote of the Board of Elections.	3.4	1,496.00
40119467	11/13/22	Kagedan, Eitan	Fulton County: Continuing drafting and revising Proposed Findings of Fact.	10.7	3,210.00
40119467	11/13/22	Wiygul, Robert	Fulton County: Research unclean hands doctrine as basis for dismissing lawsuit; analyze and annotate Petitioners' briefs before Supreme Court and Special Master regarding contempt issues in preparation for drafting argument section of post-hearing submission; prepare for examination of R. Bunch.	5.1	2,244.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/14/22	Hunter, Maria	Fulton County: Communications with Court Clerk regarding transcript of October 27, 2022 Status Conference.	0.1	15.00
40119467	11/14/22	Hunter, Maria	Fulton County: Review of transcript of October 27, 2022 Status Conference.	0.1	15.00
40119467	11/14/22	Hunter, Maria	Fulton County: Draft correspondence to Court enclosing archival copies of filings.	0.1	15.00
40119467	11/14/22	Hunter, Maria	Fulton County: Review of Order extending deadline for post-hearing submissions and update matter calendar.	0.3	45.00
40119467	11/14/22	Hunter, Maria	Fulton County: Review and cite-check of record references in the Secretary's draft proposed findings of fact.	0.8	120.00
40119467	11/14/22	Kagedan, Eitan	Fulton County: Attend evidentiary hearing on Application for Contempt.	3.5	1,050.00
40119467	11/14/22	Kagedan, Eitan	Fulton County: Revise partial draft of Post-Hearing submission.	5.7	1,710.00
40119467	11/14/22	Wiygul, Robert	Fulton County: Draft outline and prepare for examination of R. Bunch; attend third day of evidentiary hearing.	4.9	2,156.00
40119467	11/14/22	Wiygul, Robert	Fulton County: Emails with T. Carroll regarding key access log; communications with E. Kagedan regarding same; conduct initial review of draft proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing elements of contempt.	6.7	2,948.00
40119467	11/15/22	Hill, John	Fulton County: Confer with R. Wiygul regarding contempt proceeding in preparation for review of post-hearing submission.	0.2	50.00
40119467	11/15/22	Hill, John	Fulton County: Review and analyze draft post-hearing submission.	0.5	125.00
40119467	11/15/22	Hunter, Maria	Fulton County: Review of redacted copy of November 10, 2022 hearing transcript.	0.1	15.00
40119467	11/15/22	Hunter, Maria	Fulton County: Review, cite-check, and revise references to case law and record in Argument section of post-hearing submission.	1.1	165.00
40119467	11/15/22	Hunter, Maria	Fulton County: Prepare exhibit in support of the Secretary's post-hearing submission.	0.1	15.00
40119467	11/15/22	Kagedan, Eitan	Fulton County: Review and revise post-hearing submission and findings of fact.	6.2	1,860.00
40119467	11/15/22	Kagedan, Eitan	Fulton County: Research on Fifth Amendment protections with respect to responses to document requests and subpoenas in preparation for responding to Petitioners' argument against admission of key access log.	1.0	300.00
40119467	11/15/22	Wiygul, Robert	Fulton County: Additional emails with T. Carroll regarding admission of key access log; review and revise proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing why Petitioners should pay the Secretary's costs and fees, why Petitioners should be required to relinquish custody of the voting machines, and why the Secretary's Exhibit 1 should be admitted into evidence; email to clients transmitting draft of post-hearing submission; communications with E. Kagedan regarding further revisions to post-hearing submission.	9.4	4,136.00
	11/15/22	Mullen, Kathleen	Review and edit post-hearing submission	2.2	660.00
40119467	11/16/22	Hunter, Maria	Fulton County: Review hearing notes regarding length of cross-examination of expert R. Macias for inclusion in Secretary's post-hearing submission.	0.2	30.00
40119467	11/16/22	Kagedan, Eitan	Fulton County: Finalize post-hearing submission.	0.8	240.00
40119467	11/16/22	Kagedan, Eitan	Fulton County: Review Petitioners' post-hearing filing.	0.9	270.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/16/22	Wiygul, Robert	Fulton County: Revise, supplement by adding introduction, and file post-hearing submission; communications with E. Kagedan and clients regarding same; review Dominion's post-hearing submission and email clients regarding same.	3.5	1,540.00
649606	11/16/22	Mavroudis, Dimitri	Review draft Post-Hearing submission.	1.4	616.00
	11/16/22	Boyer, Jacob	Review and edit Post-Hearing submission.	2.0	600.00
	11/16/22	Kotula, Kathleen	Review draft post-hearing submission	0.8	240.00
	11/16/22	Kotula, Kathleen	Review Petitioners' post-hearing submission	0.4	120.00
	11/16/22	Mullen, Kathleen	Review Petitioners' PPOF/Conclusions of law	0.2	60.00
40119467	11/17/22	Kagedan, Eitan	Revise application to admit Key Access Log into evidence.	1.2	360.00
40119467	11/17/22	Wiygul, Robert	Fulton County: Draft and revise application to admit key access log or for discovery sanctions; communications with E. Kagedan regarding same; review Special Master's order regarding evidentiary issues and email clients regarding same; emails with clients regarding draft application to admit key access log or for discovery sanctions.	3.9	1,716.00
	11/17/22	Kotula, Kathleen	Review court order	0.1	30.00
	11/17/22	Kotula, Kathleen	Review draft supplemental application for discovery sanctions	0.3	90.00
	11/17/22	Mullen, Kathleen	Review Supplemental Application to Admit Evidence or Impose Discovery Sanctions	0.2	60.00
	11/17/22	Fischer, Michael	Review and edit application for admission of key access log; correspond regarding status of litigation with other OAG attorneys	0.5	220.00
40119467	11/18/22	Hill, John	Fulton County: Review and comment on updated draft of post-hearing submission.	0.3	75.00
40119467	11/18/22	Kagedan, Eitan	Fulton County: Review and comment on revised Application to Admit Key Access Log into evidence.	0.7	210.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Further revise application regarding key access log per M. Fischer's comments and Special Master's Order dated November 17, 2022; email to clients regarding same; finalize and file same; email same to court staff.	1.3	572.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Review Petitioners' response to application to admit key access log and email clients regarding same; review Order granting application to admit and email clients regarding same.	0.3	132.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Review Order disposing of applications for discovery sanctions and relief for violations of Special Master's Orders and email clients regarding same.	0.3	132.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Initial review of Special Master's Report and Recommendations; emails with clients regarding same.	0.8	352.00
	11/18/22	Boyer, Jacob	Review Report and Recommendation.	1.0	300.00
	11/18/22	Kotula, Kathleen	Review Petitioners' response to application to admit key access log	0.1	30.00
	11/18/22	Kotula, Kathleen	Review court order re key access log	0.1	30.00
	11/18/22	Kotula, Kathleen	Review court order re application for discovery sanctions	0.1	30.00
	11/18/22	Kotula, Kathleen	Review court's report and recommendations	0.8	240.00
40119467	11/19/22	Wiygul, Robert	Fulton County: Detailed review and analysis of Special Master's Report and Recommendations; emails with clients regarding same.	0.9	396.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
	11/19/22	Fischer, Michael	Review report & recommendation	0.8	330.00
40119467	11/20/22	Kagedan, Eitan	Fulton County: Review Special Master's Report and Recommendation.	1.1	330.00
40119467	11/21/22	Kagedan, Eitan	Review and analyze Special Master's Report and Recommendation.	0.9	270.00
40119467	11/22/22	Hunter, Maria	Fulton County: Review of Order regarding Application for Discovery Sanctions and update matter calendar regarding submission of supporting documentation.	0.2	30.00
40119467	11/22/22	Wiygul, Robert	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County and related cases.	0.2	88.00
40119467	11/29/22	Kagedan, Eitan	Fulton County: Analyze hearing transcripts to identify portions for use in anticipated Pa. Supreme Court submission.	2.8	840.00
40120477	12/01/22	Kagedan, Eitan	Fulton County: Assess basis for potential criminal referral.	1.0	300.00
40120477	12/01/22	Wiygul, Robert	Fulton County: Videoconference with OAG attorneys regarding ethical issues involving Petitioners' counsel.	0.7	308.00
40120477	12/01/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding evidence supporting application for fees.	0.3	132.00
	12/01/22	Boyer, Jacob	Conference regarding ethical issues involving Petitioners' counsel.	0.7	210.00
40120477	12/04/22	Hunter, Maria	Fulton County: Review and analysis of vendor invoices relating to depositions in support of application for fees.	0.5	75.00
40120477	12/05/22	Hunter, Maria	Fulton County: Review and analysis of Court Reporter invoice and copying invoices for work done for depositions in support of application for fees.	0.3	45.00
40120477	12/06/22	Hunter, Maria	Fulton County: Communications with team regarding preparation of application for fees relating to depositions.	0.5	75.00
40120477	12/06/22	Kagedan, Eitan	Fulton County: Research requirements for fee application.	0.5	150.00
40120477	12/07/22	Hunter, Maria	Fulton County: Review and revise draft M. Hunter Affidavit in Support of Application for deposition-related fees and costs.	0.6	90.00
40120477	12/07/22	Kagedan, Eitan	Fulton County: Review and revise draft Affidavits and fee application.	1.1	330.00
40120477	12/07/22	Wiygul, Robert	Fulton County: Draft application for award of deposition-related costs and fees and supporting affidavits pursuant to Special Master's November 18 Order; email to T. Gates regarding his draft affidavit; email to clients transmitting draft submission for their review and comments.	6.4	2,816.00
40120477	12/07/22	Wiygul, Robert	Fulton County: Review Dominion's application for an award of costs and fees; email to clients regarding same.	0.5	220.00
	12/07/22	Kotula, Kathleen	Review draft application for award of deposition fees and costs	0.2	60.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review and update exhibits 1 and 2 to R. Wiygul Affidavit in support of application for deposition-related fees.	0.1	15.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review correspondence from Court regarding deadline to respond to Dominion Application for Fees and update matter calendar regarding same.	0.1	15.00
40120477	12/08/22	Hunter, Maria	Fulton County: Prepare redacted version to Exhibit 3 to R. Wiygul Affidavit in support of application for fees.	0.5	75.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review and cite check R. Wiygul Affidavit in Support of Application for Fees.	0.7	105.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file Application for Fees.	1.8	270.00
40120477	12/08/22	Wiygul, Robert	Fulton County: Review correspondence from Pa. Supreme Court regarding response to Dominion's application for fees and email clients regarding same.	0.2	88.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40120477	12/08/22	Wiygul, Robert	Fulton County: Communications with M. Hunter regarding redactions to invoices to be submitted in support of request for deposition-related fees and finalization of exhibits to fee request; emails to clients regarding fee request; revise and finalize fee requests and supporting exhibits.	1.1	484.00
40120477	12/15/22	Kagedan, Eitan	Fulton County: Research standards and requirements for fee petitions in preparation for drafting petition to recover all appeal-related fees and costs in accordance with Special Master's Recommendation.	2.0	600.00
40120477	12/15/22	Wiygul, Robert	Weekly conference call with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.2	88.00
40120477	12/19/22	Kagedan, Eitan	Fulton County: Check in regarding Dominion application for fees and prepare no answer letter.	0.3	90.00
40120477	12/20/22	Wiygul, Robert	Fulton County: Revise no-answer letter in response to Dominion's application for fees and email clients regarding same.	0.2	88.00
40120477	12/21/22	Wiygul, Robert	Fulton County: Communications with clients regarding response to Dominion's application for fees and finalize and file same.	0.2	88.00
40120477	12/21/22	Wiygul, Robert	Fulton County: Email clients regarding Petitioners' response to Dominion's application for costs and fees.	0.1	44.00
40120477	12/22/22	Wiygul, Robert	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters; review federal court docket to determine status of Fulton County v. Dominion case.	0.2	88.00
40120477	12/29/22	Wiygul, Robert	Fulton County: Review order awarding the Secretary her deposition-related fees and costs; email clients regarding same.	0.2	88.00
	12/29/22	Kotula, Kathleen	Review court order awarding deposition fees and costs	0.1	30.00
40121133	01/05/23	Wiygul, Robert	Attend weekly conference call with clients, OAG, and SUDC regarding the status of the Fulton County case and related cases.	0.1	44.00
40121133	01/30/23	Wiygul, Robert	Review check and cover letter received from Petitioners' counsel regarding award of deposition-related costs and fees; emails with clients regarding same; draft letter to K. Kotula enclosing check.	0.5	220.00
40123061	04/19/23	Kagedan, Eitan	Fulton County: Conduct comprehensive review and analysis of Pa. Supreme Court opinions resolving Secretary's appeal and application for sanctions; identify outstanding issues for potential future briefing; assess implications for case going forward; draft summary of Pa. Supreme Court opinions for clients; communications with clients and HASPS team regarding Supreme Court decision.	3.6	1,080.00
40123061	04/19/23	Wiygul, Robert	Fulton County: Review Supreme Court opinions awarding sanctions and resolving appeal; communications with team, clients, and counsel for Dominion regarding same.	1.5	660.00
	04/19/23	Boyer, Jacob	Review SCOPA opinion	1.0	300.00
	04/19/23	Kotula, Kathleen	Review SCOPA opinion	1.5	450.00
	04/19/23	Mullen, Kathleen	Review and analyze SCOPA opinion	1.5	450.00
40123061	04/20/23	Kagedan, Eitan	Fulton County: Review correspondence concerning outstanding issues raised by SCOPA Opinion.	0.1	30.00
40123061	04/21/23	Kagedan, Eitan	Fulton County: Assemble invoices for fee petition.	0.3	90.00
40123061	04/25/23	Kagedan, Eitan	Fulton County: Review correspondence from court.	0.1	30.00
40123061	04/27/23	Wiygul, Robert	Attend weekly conference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.2	88.00

Exhibit D - Expenditures of Legal-Professional Time
[from April 13, 2022]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40123061	04/28/23	Kagedan, Eitan	Fulton County: Develop strategy for drafting fee petition, including review of prior filings and consideration of including Commonwealth attorney time expenditures.	0.7	210.00
40123061	04/28/23	Hunter, Maria	Review of Order regarding Motions for Fees and Costs and update matter calendar regarding same.	0.1	15.00
40123061	04/28/23	Wiygul, Robert	Fulton County: Review Special Master's Order setting deadlines for fee submission and status report regarding expert report; telephone conference with E. Kagedan regarding next steps; email to clients regarding same.	0.4	176.00
	04/28/23	Kotula, Kathleen	Review special master's scheduling order	0.1	30.00
	05/22/23	Kotula, Kathleen	Calculate time in Fulton County matter	2.0	600.00

<i>Fees incurred after April 12, 2022</i>	627.5	\$ 212,850.00
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Time Keeper	Hours	Amount
Aronchick, Mark A.	7.50	\$ 3,300.00
Wiygul, Robert	222.00	\$ 97,680.00
Hill, John	7.40	\$ 1,869.00
Kagedan, Eitan	219.30	\$ 65,790.00
Mascioli, Gianni	23.30	\$ 5,825.00
Fischer, Michael	8.50	\$ 3,740.00
Kotula, Kathleen	16.50	\$ 4,950.00
Mullen, Kathleen	7.50	\$ 2,250.00
Boyer, Jacob	14.50	\$ 4,350.00
Mavroudis, Dimitri	27.40	\$ 12,056.00
Arteaga, Alexandra	15.70	\$ 2,355.00
Hunter, Maria	57.90	\$ 8,685.00

EXHIBIT E

Exhibit E - Expenditures of Legal-Professional Time
[Commw Ct proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113012	12/16/21	Kagedan, Eitan	Fulton: Research to support basis for motion for entry of preservation order.	1.0	300.00
40113012	12/16/21	Wiygul, Robert	Draft and revise emergency application for preservation order prohibiting December 22 "examination" of voting equipment by Envoy Sage and communications with team, clients, and OAG regarding same.	9.1	2,866.50
40113012	12/17/21	Ferrari, Kim	Review and cite check emergency application for Order re spoliation of evidence; review and analyze key communications and organize exhibits for same; draft potential declaration of M. Hangley; review emails with King; file with Commonwealth court.	6.0	900.00
40113012	12/17/21	Hangley, Michele D.	Edits, discussion, finalizing and filing spoliation motion.	3.0	1,320.00
40113012	12/17/21	Kagedan, Eitan	Fulton County: Review, revise, and hone strategy regarding Emergency Motion to Preserve Evidence and related communications and prepare same for filing.	4.0	1,200.00
40113012	12/17/21	Kagedan, Eitan	Fulton County: Draft and revise Macias Affidavit in support of Emergency Motion regarding Spoliation.	2.2	660.00
40113012	12/17/21	Wiygul, Robert	Revise and finalize emergency application to enjoin Envoy Sage inspection and supporting documents and communicate with team, clients, OAG, and R. Macias regarding same.	5.7	1,795.50
	12/17/21	Kotula, Kathleen	Review draft emergency application re spoliation	0.3	90.00
	12/17/21	Kotula, Kathleen	Review letter from Dominion to Fulton County re proposed inspection	0.2	60.00
40113012	12/18/21	Hangley, Michele D.	Review, consider and circulate to team King's comments to press on spoliation motion.	0.5	220.00
40113012	12/18/21	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding Envoy Sage "inspection."	0.6	180.00
40113012	12/18/21	Wiygul, Robert	Conference with K. Stimson regarding recent developments relating to scheduled inspection of Fulton County's voting equipment.	0.3	94.50
40113012	12/18/21	Wiygul, Robert	Communications with team, clients, Dominion's counsel about scheduling order relating to emergency application to enjoin inspection; communications with team, clients, Dominion's counsel, and R. Macias regarding press-reported interview of T. King regarding purpose of inspection.	1.2	378.00
40113012	12/20/21	Hangley, Michele D.	Spoliation motion: review response, prepare for argument, discuss strategy.	2.5	1,100.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Review and analyze Opposition to Application for Emergency Relief.	0.5	150.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Research whether an order denying Emergency Motion Regarding Spoliation is subject to immediate appeal.	3.2	960.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Review draft application for leave to submit AP article.	0.3	90.00
40113012	12/20/21	Kagedan, Eitan	Fulton County: Meet with Ryan Macias to discuss planned Envoy Sage "inspection" and follow up with Michele Hangley and Rob Wiygul.	2.1	0.00
40113012	12/20/21	Wiygul, Robert	Prepare for and conduct call with R. Macias regarding Fulton County emergency application and oral argument (including preparatory call with M. Hangley).	1.0	315.00
40113012	12/20/21	Wiygul, Robert	Review and analyze Petitioners' answer to emergency application and communicate with team and clients regarding same; review memorandum by E. Kagedan regarding potential appealability of order denying emergency application; draft application for leave to submit additional exhibit in support of emergency application.	4.9	1,543.50

Exhibit E - Expenditures of Legal-Professional Time
[Commw Ct proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113012	12/20/21	Wiygul, Robert	Conference with R. Macias regarding Lahr affidavit in support of Petitioners' answer to Emergency Application and conferences with M. Hangley and E. Kagedan regarding strategy for oral argument.	1.2	378.00
	12/20/21	Kotula, Kathleen	Review Fulton County's response to emergency application	0.3	90.00
	12/20/21	Fischer, Michael	Review Fulton County Filing; correspond with counsel for members of Senate Intergovernmental Operations Committee regarding inspection	0.3	110.00
40113012	12/21/21	Hangley, Michele D.	Prepared for, mooted, attended Fulton argument; discussed follow up.	3.0	1,320.00
40113012	12/21/21	Kagedan, Eitan	Fulton County: Review argument outline.	0.7	0.00
40113012	12/21/21	Kagedan, Eitan	Fulton County: Appear for and follow up regarding oral argument on the Secretary's Emergency Application.	1.8	0.00
40113012	12/21/21	Wiygul, Robert	Fulton: Prepare for and participate in telephone argument on emergency application; follow-up conferences with client and team regarding same.	3.7	1,165.50
40113012	12/21/21	Wiygul, Robert	Fulton: Draft and revise outline for oral argument on emergency application to enjoin inspection.	3.5	1,102.50
40113012	12/21/21	Wiygul, Robert	Fulton: Conference with clients and OAG to prepare for oral argument on emergency application to enjoin inspection.	0.9	283.50
	12/21/21	Kotula, Kathleen	Attend meeting re prep for argument on emergency application	0.5	150.00
	12/21/21	Fischer, Michael	Participate in teleconference to prepare for argument; review court order	0.8	330.00
40113012	12/22/21	Hangley, Michele D.	Strategy and discussions with Dominion and Macias re protocol.	1.5	660.00
40113012	12/23/21	Hangley, Michele D.	Received, reviewed Macias draft report re inspection.	0.5	220.00
40113012	12/23/21	Wiygul, Robert	Telephone conference with K. Stimson (Dominion) regarding impending inspection of Fulton County voting equipment and Dominion's potential involvement; follow up conference with M. Hangley regarding strategy for negotiating inspection protocol.	0.8	252.00
40113012	12/24/21	Hangley, Michele D.	Discussed national press reports with Macias.	0.4	176.00
40113012	12/27/21	Hangley, Michele D.	Drafted protocol for Fulton inspection.	3.0	1,320.00
40113012	12/28/21	Hangley, Michele D.	Drafted protocol; discussed strategy for Fulton protective order.	2.0	880.00
40113012	12/28/21	Kagedan, Eitan	Fulton County: Call with Ryan Macias, Aimee Thomson, Michele Hangley, and Rob Wiygul concerning negotiation of protocol for Envoy Sage Inspection.	0.9	0.00
40113012	12/28/21	Kagedan, Eitan	Review and consider impact of correspondence regarding conversation with Dominion's outside counsel.	0.2	60.00
40113012	12/28/21	Wiygul, Robert	Conference with R. Macias regarding terms of proposed protocol governing inspection of Fulton voting machines and preparation and follow-up conferences with M. Hangley regarding same.	1.5	472.50
40113012	12/28/21	Wiygul, Robert	Fulton: Telephone calls and emails with outside counsel for Dominion regarding their potential intervention and follow up communications with M. Hangley and clients regarding same.	1.1	346.50
40113012	12/29/21	Hangley, Michele D.	Drafted protocol for Fulton January 10 inspection.	2.7	1,188.00
40113012	12/29/21	Hangley, Michele D.	Located and advised on applicability of models for Protective Order.	0.5	220.00
40113012	12/29/21	Hangley, Michele D.	Located and advised on applicability of models for Dominion intervention in Fulton County case.	0.5	220.00
40113012	12/29/21	Kagedan, Eitan	Fulton County: Review and comment on draft Inspection Protocol.	0.8	240.00
40113012	12/29/21	Kagedan, Eitan	Develop approach for and begin drafting Protective Order.	1.4	420.00

Exhibit E - Expenditures of Legal-Professional Time
[Commw Ct proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113012	12/29/21	Wiygul, Robert	Review and comment on draft inspection protocol and email R. Macias and A. Thomson regarding same.	1.0	315.00
40113012	12/30/21	Hangley, Michele D.	Fulton: Protocol and protective order drafting.	1.5	660.00
40113012	12/30/21	Kagedan, Eitan	Draft Protective Order and review and comment on draft Protocol regarding Envoy Sage inspection.	3.2	960.00
40113012	12/30/21	Wiygul, Robert	Review and comment on draft Fulton inspection protocol and protective order and communications with team and clients regarding same; communications with Dominion's counsel regarding Dominion's possible intervention.	3.6	1,134.00
40113012	12/31/21	Hangley, Michele D.	Discussed potential intervention in Fulton County case with Dominion; sent protocol to King.	2.0	880.00
40113012	12/31/21	Kagedan, Eitan	Review revisions to draft Fulton protective order in advance of Envoy Sage inspection.	0.5	150.00
40113012	12/31/21	Wiygul, Robert	Communications with counsel for Dominion regarding their potential intervention in Fulton County case.	1.0	315.00
40113012	12/31/21	Wiygul, Robert	Review and analyze R. Macias's comments on draft protective order and email clients regarding same; revise protective order and emails with R. Macias regarding same.	0.9	283.50
	12/31/21	Kotula, Kathleen	Review draft inspection protocol and protective order	0.5	150.00
40113808	01/01/22	Wiygul, Robert	Fulton County: Email to clients regarding call with Dominion's counsel regarding possible intervention motion.	0.3	132.00
40113808	01/03/22	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding Dominion Motion to Intervene and plan next steps.	0.9	270.00
40113808	01/03/22	Wiygul, Robert	Fulton County: Telephone conference with K. Kotula regarding Buchanan's representation of Dominion and conference with E. Kagedan regarding immediate- and medium-term task lists (negotiation of protocol with Fulton County, drafting of potential motion for relief regarding inspection, etc.).	0.6	264.00
40113808	01/03/22	Wiygul, Robert	Fulton County: Review and analyze Dominion's motion to intervene and attachments and email clients and Dominion regarding same.	0.9	396.00
40113808	01/04/22	Kagedan, Eitan	Fulton County: Review, analyze, and plan response to Fulton County's proposed Inspection Protocol.	1.9	570.00
40113808	01/04/22	Kagedan, Eitan	Fulton County: Draft Motion for Entry of Order regarding Inspection Protocol.	1.4	420.00
40113808	01/04/22	Kagedan, Eitan	Fulton County: Develop strategy for negotiation of Inspection Protocol and for bringing disputes regarding the same before the court, particularly in light of Dominion's pending Motion to Intervene.	0.6	180.00
40113808	01/04/22	Wiygul, Robert	Fulton County: Review proposed inspection protocol and scope of inspection by Petitioners; communications with E. Kagedan, R. Macias, and clients regarding same.	1.4	616.00
40113808	01/04/22	Wiygul, Robert	Fulton County: Review order scheduling hearing on Dominion's application and communications with clients, team, and R. Macias regarding same.	0.4	176.00
40113808	01/04/22	Wiygul, Robert	Conference with S. Gallagher regarding evidentiary hearing on Dominion's application to intervene; emails to T. King and clients regarding Fulton County's recall of their proposed protocol.	0.6	264.00
	01/04/22	Kotula, Kathleen	Review T. King's proposed edits to inspection protocol	0.2	60.00
	01/04/22	Fischer, Michael	Review Fulton County's proposed inspection protocol	0.3	110.00
40113808	01/05/22	Kagedan, Eitan	Fulton County: Review and revise draft stipulations in advance of hearing on Dominion Motion to Intervene, including checking proposed stipulations against factual record.	1.4	420.00
40113808	01/05/22	Kagedan, Eitan	Fulton County: Draft letter to court regarding status of inspection protocol negotiations.	3.0	900.00

Exhibit E - Expenditures of Legal-Professional Time
[Commw Ct proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/05/22	Kagedan, Eitan	Fulton County: Research regarding potential interlocutory appeal of adverse order on Dominion motion to intervene.	1.3	390.00
40113808	01/05/22	Kagedan, Eitan	Fulton County: Develop strategy and game plan for Dominion Motion to Intervene and inspection protocol negotiations.	1.0	300.00
40113808	01/05/22	Wiygul, Robert	Fulton County: Conference with clients regarding intervention hearing and inspection protocol negotiations and follow up conference with E. Kagedan regarding same.	0.7	308.00
40113808	01/05/22	Wiygul, Robert	Fulton County: Draft letter to Judge Leavitt seeking postponement of inspection and requirements in inspection protocol.	5.9	2,596.00
	01/05/22	Kotula, Kathleen	Attend meeting re Fulton inspection protocol	0.5	150.00
	01/05/22	Fischer, Michael	Participate in teleconference regarding inspection protocol	0.5	220.00
40113808	01/06/22	Ferrari, Kim	Fulton County: Edit answer; edit letter and exhibits; prepare for hearing.	4.0	600.00
40113808	01/06/22	Kagedan, Eitan	Fulton County: Draft, review, revise, and respond to comments on letter to court regarding status of inspection protocol negotiations and answer to Dominion Motion to Intervene.	4.0	1,200.00
40113808	01/06/22	Kagedan, Eitan	Fulton County: Research impact of Sunshine Act on court's ability to enjoin public meeting.	0.5	150.00
40113808	01/06/22	Wiygul, Robert	Fulton County: Finish drafting letter to Judge Leavitt seeking postponement of inspection and specific protocol terms; revise answer to Dominion's application to intervene.	2.1	924.00
40113808	01/06/22	Wiygul, Robert	Fulton County: Communications with team, parties, and clients regarding proposed stipulation of facts; communications with clients and team regarding answer to Dominion's application to intervene and letter to Court regarding status of negotiations over inspection protocol.	1.8	792.00
	01/06/22	Kotula, Kathleen	Review draft letter to court regarding negotiation of inspection protocol	0.1	30.00
	01/06/22	Kotula, Kathleen	Review T. King's additional proposed edits to inspection protocol	0.2	60.00
40113808	01/07/22	Ferrari, Kim	Coordinate logistics of recording Fulton County Inspection; watch hearing in prep for inspection; work on draft of potential King's Bench petition.	2.0	300.00
40113808	01/07/22	Kagedan, Eitan	Fulton County: Conduct final preparations for, attend, and conduct post mortem on hearing on Dominion Motion to Intervene and status conference on negotiation of inspection protocol.	4.8	1,440.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Prepare for and attend hearing and status conference and follow up communications with team, client, and OAG regarding same.	4.9	2,156.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Conference with counsel for Dominion regarding negotiation of protocol.	0.4	176.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Conference with clients and OAG regarding strategy following hearing.	0.9	396.00
40113808	01/07/22	Wiygul, Robert	Fulton County: Conference with R. Macias regarding case status and draft inspection protocol.	0.8	352.00
	01/07/22	Kotula, Kathleen	Attend meeting re Fulton follow-up on hearing re Dominion motion to intervene and conference on inspection protocol	0.5	150.00
	01/07/22	Fischer, Michael	Participate in teleconference regarding litigation strategy	1.0	440.00
40113808	01/08/22	Kagedan, Eitan	Fulton County: Review and comment on draft inspection protocol and client update and strategy email memo.	1.7	510.00

Exhibit E - Expenditures of Legal-Professional Time
[Commw Ct proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/08/22	Wiygul, Robert	Fulton County: Draft inspection protocol and communications with R. Macias and E. Kagedan regarding same; revise same and email clients regarding inspection protocol and related issues; review emails from other parties regarding negotiations.	8.2	3,608.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Conference with all parties regarding negotiation of inspection protocols.	1.3	390.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Follow up regarding conference with all parties regarding negotiation of inspection protocols.	0.8	240.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Review, revise, and comment on drafts of inspection protocol agreement.	1.7	510.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Review, revise, and comment on Emergency Application to Postpone Inspection Based on Expert Availability.	0.5	150.00
40113808	01/09/22	Kagedan, Eitan	Fulton County: Review and respond to correspondence regarding inspection protocol negotiations.	0.4	120.00
40113808	01/09/22	Wiygul, Robert	Fulton County: Draft and revise emergency application to reschedule inspection based on expert's unavailability.	1.6	704.00
40113808	01/09/22	Wiygul, Robert	Fulton County: Prepare for and participate in conference with parties regarding inspection protocols and follow-up conferences with E. Kagedan and OAG regarding same; revise summary of conference and email same to clients.	4.2	1,848.00
40113808	01/09/22	Wiygul, Robert	Fulton County: Revise proposed inspections protocol and communications with E. Kagedan, R. Macias, and clients regarding same.	2.2	968.00
	01/09/22	Kotula, Kathleen	Review new draft inspection protocol from T. King	0.3	90.00
	01/09/22	Kotula, Kathleen	Review draft of Secretary's inspection protocol	0.3	90.00
40113808	01/10/22	Kagedan, Eitan	Fulton County: Review, comment on, and draft response to Petitioners' proposal.	1.4	420.00
40113808	01/10/22	Kagedan, Eitan	Fulton County: Research issues related to viability and procedural requirements for permissive interlocutory appeal.	0.4	120.00
40113808	01/10/22	Kagedan, Eitan	Fulton County: Review and develop strategy related to correspondence regarding planned inspection.	1.8	540.00
40113808	01/10/22	Wiygul, Robert	Fulton County: Finalize and file emergency application to reschedule inspection based on expert's unavailability and call Prothonotary's Office regarding same; emails to clients regarding same.	0.5	220.00
40113808	01/10/22	Wiygul, Robert	Review and analyze revised inspection protocol proposal from Fulton County and communications with R. Macias, E. Kagedan, and clients regarding same.	1.0	440.00
40113808	01/10/22	Wiygul, Robert	Fulton County: Begin drafting letter to T. King regarding inspection protocol based on E. Kagedan's draft.	2.3	1,012.00
	01/10/22	Kotula, Kathleen	Review Petitioners' revised inspection protocol	0.2	60.00
40113808	01/11/22	Ferrari, Kim	Fulton County: Coordinate video for inspection; edit letter and pull exhibits to same.	2.0	300.00
40113808	01/11/22	Kagedan, Eitan	Fulton County: Draft Joint Status Report regarding status of negotiations and develop strategy regarding same.	1.5	450.00
40113808	01/11/22	Kagedan, Eitan	Fulton County: Review and revise letter to Tom King regarding inspection protocol negotiations.	3.0	900.00
40113808	01/11/22	Wiygul, Robert	Fulton County: Finish drafting letter to T. King regarding inspection protocol and email clients regarding same.	2.5	1,100.00
40113808	01/11/22	Wiygul, Robert	Conferences with clients, OAG, and SUDC regarding coordinating strategy in Fulton County and IOC subpoena cases.	1.4	616.00
40113808	01/11/22	Wiygul, Robert	Fulton County: Begin drafting Respondent's portion of joint status report.	2.0	880.00
40113808	01/11/22	Wiygul, Robert	Fulton County: Revise letter to T. King regarding inspection protocols and communicate with clients, OAG, and R. Macias regarding same.	1.3	572.00

Exhibit E - Expenditures of Legal-Professional Time
[Commw Ct proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
	01/11/22	Kotula, Kathleen	Review draft letter to T. King re latest protocol proposal (1/10/22)	0.2	60.00
40113808	01/12/22	Kagedan, Eitan	Fulton County: Draft sections of Renewed Emergency Application to Prohibit Inspection.	2.2	660.00
40113808	01/12/22	Kagedan, Eitan	Fulton County: Review letter from Tom King regarding inspection protocol negotiations.	0.1	30.00
40113808	01/12/22	Wiygul, Robert	Conferences with clients, SUDC, and OAG regarding IOC subpoena and Fulton County cases.	0.7	308.00
40113808	01/12/22	Wiygul, Robert	Fulton County: Develop E. Kagedan's draft of renewed emergency application to prohibit inspection.	0.6	264.00
	01/12/22	Boyer, Jacob	Review and edit Renewed Emergency Application to Prohibit Inspection and meetings about the same.	1.0	300.00
	01/12/22	Kotula, Kathleen	Review response letter from T. King	0.1	30.00
	01/12/22	Fischer, Michael	Call with R. Wiygul regarding litigation	0.3	110.00
40113808	01/13/22	Ferrari, Kim	Fulton County: Review status and coordinate details of video for inspection; prepare for inspection and work with R Wiygul; edit renewed emergency application and organize exhibits to same; redact cell phone numbers; cite check same.	4.0	600.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Draft Petition for Writ of Mandamus or Extraordinary Jurisdiction in anticipation of Commonwealth Court's not issuing an order prior to inspection.	3.9	1,170.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Draft, revise, and negotiate Joint Status Report.	1.1	330.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Conduct Meet and Confer with counsel for Fulton County regarding negotiation of inspection protocols.	0.2	60.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Review correspondence from Matt Haverstick.	0.1	30.00
40113808	01/13/22	Kagedan, Eitan	Fulton County: Review and revise Emergency Application.	2.2	660.00
40113808	01/13/22	Wiygul, Robert	Fulton County: Finish drafting and revise renewed emergency application for relief regarding inspection and Secretary's portion of joint status report and conference with clients and E. Kagedan regarding same.	6.3	2,772.00
40113808	01/13/22	Wiygul, Robert	Prepare for potential hearing before Judge Leavitt regarding Secretary's emergency applications for relief and the status of the parties' negotiations (including travel from Philadelphia to Fulton County to attend potential inspection).	4.5	1,980.00
	01/13/22	Kotula, Kathleen	Review draft renewed emergency application to enjoin inspection	0.3	90.00
	01/13/22	Kotula, Kathleen	Review Petitioners' response to renewed emergency application	0.2	60.00

Totals	221.4	\$	74,955.00
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Time Keeper	Hours	Amount
Hangle, Michele D.	23.60	\$ 10,384.00
Wiygul, Robert	102.40	\$ 39,881.00
Fischer, Michael	3.00	\$ 1,320.00
Kotula, Kathleen	4.90	\$ 1,470.00
Boyer, Jacob	1.00	\$ 300.00
Kagedan, Eitan	68.50	\$ 18,900.00
Ferrari, Kim	18.00	\$ 2,700.00

EXHIBIT F

Exhibit F - Expenditures of Legal-Professional Time
[Inspection of Voting Equipment]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/14/22	Ferrari, Kim	Fulton County: Prepare for inspection and file emergency application to stay with SCOPA; travel to inspection and attend same.	8.0	1,200.00
40113808	01/14/22	Hunter, Maria	Fulton County: Research docket report to be included as exhibit to Notice of Appeal.	0.1	15.00
40113808	01/14/22	Hunter, Maria	Fulton County: Review and update Notice of Appeal.	0.2	30.00
40113808	01/14/22	Hunter, Maria	Fulton County: Review and update exhibits to Notice of Appeal and Jurisdictional Statement.	0.3	45.00
40113808	01/14/22	Kagedan, Eitan	Fulton County: Draft filings and manage tasks related to emergency application for stay to Pennsylvania Supreme Court, including jurisdictional statement and notice of appeal.	5.9	1,770.00
40113808	01/14/22	Wiygul, Robert	Fulton County: Prepare for potential hearing before Judge Leavitt on status of parties' negotiations; review and conference with clients and team regarding order denying emergency applications to prevent inspection from going forward; draft appeal papers and emergency application seeking stay from Pa. Supreme Court.	4.8	2,112.00
40113808	01/14/22	Wiygul, Robert	Attend public meeting in Fulton County; conferences with Pa. Supreme Court clerks and clients regarding order staying inspection; conference with R. Macias and Dominion's representatives about Fulton County proceedings (including return travel from Fulton County to Philadelphia)	4.7	2,068.00
	01/14/22	Boyer, Jacob	Review and edit emergency application to stay.	0.5	150.00
	01/14/22	Kotula, Kathleen	Review court order and memorandum opinion denying anti-spiliation application	0.3	90.00
	01/14/22	Kotula, Kathleen	Review draft SCOPA stay application	0.3	90.00
40113808	01/16/22	Wiygul, Robert	Fulton County: telephone conferences with E. Kagedan regarding strategy for Supreme Court filings and related research tasks.	1.4	616.00
40113808	01/17/22	Ferrari, Kim	Fulton County: Draft letter to court regarding appeal and send check for filing fee;	1.0	150.00
40113808	01/17/22	Kagedan, Eitan	Fulton County: Draft application and petition for permissive interlocutory review.	4.6	1,380.00
40113808	01/17/22	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding case status and Supreme Court's stay of inspection.	0.2	88.00
40113808	01/17/22	Wiygul, Robert	Fulton County: Telephone conference with K. Stimson regarding recent developments.	0.1	44.00
40113808	01/18/22	Ferrari, Kim	Fulton County: Draft letter to court regarding appeal filed; coordinate payment of appeal fees.	1.0	150.00
40113808	01/18/22	Kagedan, Eitan	Fulton County: Review and develop response to Petitioners' Response to Emergency Application for Stay.	0.9	270.00
40113808	01/18/22	Kagedan, Eitan	Fulton County: Revise and consider strategy regarding Motion for Permissive Interlocutory Appeal.	2.1	630.00
40113808	01/18/22	Kagedan, Eitan	Fulton County: Review, comment on, and draft sections of, Reply in Support of Emergency Stay.	1.9	570.00
40113808	01/18/22	Wiygul, Robert	Conference with clients, OAG, and SUDC regarding IOC subpoena and Fulton County cases.	0.3	132.00
40113808	01/18/22	Wiygul, Robert	Fulton County: Draft reply in support of SCOPA application for stay pending appeal.	6.8	2,992.00
	01/18/22	Kotula, Kathleen	Review Petitioners' answer to emergency application for stay of inspection (SCOPA)	0.2	60.00
40113808	01/19/22	Ferrari, Kim	Fulton County: Cite check and edit reply brief; gather key exhibits to same and file with SCOPA.	3.0	450.00
40113808	01/19/22	Kagedan, Eitan	Fulton County: Draft Response to Democratic Senators' Application to Participate.	0.4	120.00
40113808	01/19/22	Kagedan, Eitan	Fulton County: Draft, revise, and finalize Reply in support of SCOPA Emergency Application for Stay.	3.0	900.00
40113808	01/19/22	Kagedan, Eitan	Fulton County: Review filings ancillary to Emergency Application for Stay.	0.5	150.00

Exhibit F - Expenditures of Legal-Professional Time
[Inspection of Voting Equipment]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/19/22	Wiygul, Robert	Fulton County: Finish drafting, revise, and file reply in support of SCOPA application for stay pending appeal; communications with team and clients regarding same.	7.6	3,344.00
	01/19/22	Kotula, Kathleen	Review draft reply ISO application for stay (SCOPA)	0.2	60.00
	01/19/22	Fischer, Michael	Review and edit reply brief in support of application for stay pending appeal	0.8	330.00
40113808	01/20/22	Ferrari, Kim	Fulton County: Edit, finalize and file with PAC File the application regarding amicus filing of IOC Democratic Senators.	1.0	150.00
40113808	01/20/22	Wiygul, Robert	Conference with clients and SUDC regarding status of and outlook for Fulton County case and IOC subpoena case.	0.2	88.00
40113808	01/20/22	Wiygul, Robert	Fulton County: Review and revise response to Democrat Senators' amicus brief and communications with client regarding same; review order regarding response to Dominion's Jurisdictional Statement and communications with client regarding same.	0.8	352.00
40113808	01/21/22	Ferrari, Kim	Fulton County: Draft no answer letter and file same.	0.5	75.00
40113808	01/22/22	Wiygul, Robert	Fulton County: Review and analyze proposed amicus brief by Senators Corman and Dush and email clients and OAG regarding same.	0.9	396.00
40113808	01/23/22	Kagedan, Eitan	Fulton County: Review and analyze Corman/Dush Amicus Brief.	0.8	240.00
40113808	01/24/22	Kagedan, Eitan	Fulton County: Draft Response to Dush and Corman Amicus Application.	3.2	960.00
40113808	01/24/22	Wiygul, Robert	Fulton County: Review order regarding response to Senators' application for leave to file amicus brief and communicate with clients regarding same; communicate with E. Kagedan regarding draft response; review draft response.	0.7	308.00
40113808	01/25/22	Ferrari, Kim	Fulton County: Edit response to Dush application and submit same to court.	1.0	150.00
40113808	01/25/22	Kagedan, Eitan	Fulton County: Revise and finalize Opposition to Dush/Corman Amicus filing.	1.5	450.00
	01/25/22	Fischer, Michael	Review and edit response to amicus brief submitted by Senators Dush & Corman	1.3	550.00

Totals	72.9	\$	23,725.00
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Time Keeper	Hours	Amount
Wiygul, Robert	28.50	\$ 12,540.00
Fischer, Michael	2.00	\$ 880.00
Kotula, Kathleen	1.00	\$ 300.00
Boyer, Jacob	0.50	\$ 150.00
Kagedan, Eitan	24.80	\$ 7,440.00
Ferrari, Kim	15.50	\$ 2,325.00
Hunter, Maria	0.60	\$ 90.00

EXHIBIT G

Exhibit G - Expenditures of Legal-Professional Time
[Supreme Court Appeal]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40113808	01/25/22	Wiygul, Robert	Fulton County: Revise response to application for leave to file amicus brief by Senators Dush and Corman.	2.7	1,188.00
40113808	01/26/22	Kagedan, Eitan	Fulton County: Review court notices regarding appeal status.	0.2	60.00
40113808	01/27/22	Kagedan, Eitan	Fulton County: Review and circulate Orders.	0.2	60.00
40114406	02/02/22	Kagedan, Eitan	Fulton County: Draft preliminary sections of Opening SCOPA Brief.	1.0	300.00
40114406	02/05/22	Wiygul, Robert	Fulton County: Begin drafting opening appellate brief.	2.4	1,056.00
40114406	02/06/22	Wiygul, Robert	Fulton County: Continue drafting opening appellate brief.	2.2	968.00
40114406	02/10/22	Hunter, Maria	Fulton County: Review and identify pleadings in Commonwealth Court matter and start drafting Reproduced Record for SCOPA appeal.	4.2	630.00
40114406	02/11/22	Hunter, Maria	Fulton County: Review of Supreme Court and Commonwealth Court filings and continue identifying materials for inclusion in Reproduced Record.	4.7	705.00
40114406	02/13/22	Hunter, Maria	Fulton County: Continued review of pleadings and filings and identification of materials for inclusion in Reproduced Record.	1.3	195.00
40114406	02/14/22	Hunter, Maria	Fulton County: Review and update materials for potential inclusion in Reproduced Record.	1.2	180.00
40114406	02/14/22	Wiygul, Robert	Fulton County: Continue drafting opening appellate brief.	2.6	1,144.00
40114406	02/14/22	Wiygul, Robert	Fulton County: Review and comment on draft Reproduced Record.	0.6	264.00
40114406	02/15/22	Arteaga, Alexandra	Fulton County: Prepare two No Answer letters.	1.0	150.00
40114406	02/15/22	Hunter, Maria	Fulton County: Review and update Reproduced Record and Table of Contents to Reproduced Record.	6.6	990.00
40114406	02/15/22	Wiygul, Robert	Conference with OAG and clients regarding pending matters, including IOC subpoena case and Fulton County.	0.2	88.00
40114406	02/15/22	Wiygul, Robert	Fulton County: Finish drafting opening appellate brief.	6.3	2,772.00
40114406	02/15/22	Wiygul, Robert	Fulton County: Review draft reproduced record and email M. Hunter regarding same; continue drafting appellate brief.	4.1	1,804.00
	02/15/22	Kotula, Kathleen	Review draft SCOPA brief	0.5	150.00
40114406	02/16/22	Ferrari, Kim	Fulton County: Cite check and edit brief of appellant; finalize reproduced records and file with PAC File.	7.0	1,050.00
40114406	02/16/22	Hill, John	Fulton County: Revise appellate brief.	1.3	325.00
40114406	02/16/22	Hunter, Maria	Fulton County: Review, update, and number Reproduced Record and Table of Contents to Reproduced Record.	1.2	180.00
40114406	02/16/22	Wiygul, Robert	Fulton County: Revise, finalize, and file initial appellate brief.	6.1	2,684.00
40115037	03/03/22	Kagedan, Eitan	Fulton County: Review and analyze Opening Appellate brief in preparation for drafting Reply Brief.	0.9	270.00
40115037	03/09/22	Kagedan, Eitan	Fulton County: Analyze Petitioners' SCOPA Response brief.	1.0	300.00
40115037	03/09/22	Kagedan, Eitan	Fulton County: Review Dominion appellate briefing.	0.7	210.00
	03/10/22	Kotula, Kathleen	Review Fulton County's answering brief (SCOPA)	0.3	90.00
40115037	03/11/22	Kagedan, Eitan	Fulton County: Research standard for prerogative appellate jurisdiction.	1.4	420.00
40115037	03/11/22	Kagedan, Eitan	Fulton County: Identify key points for SCOPA Reply brief, including review of Dominion appellate briefing and research regarding the presumption of validity afforded to administrative action.	4.1	1,230.00

Exhibit G - Expenditures of Legal-Professional Time
[Supreme Court Appeal]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40115037	03/11/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' answering brief in Supreme Court appeal; conference with E. Kagedan regarding strategy for reply brief.	0.9	396.00
40115037	03/14/22	Kagedan, Eitan	Fulton County: Draft outline of procedure and standards for permissive interlocutory appeal and prerogative interlocutory appeal.	1.6	480.00
40115037	03/16/22	Wiygul, Robert	Fulton County: Begin drafting SCOPA reply brief.	2.4	1,056.00
40115037	03/17/22	Wiygul, Robert	Fulton County: Continue drafting SCOPA reply brief.	4.7	2,068.00
40115037	03/18/22	Kagedan, Eitan	Fulton County: Review and revise SCOPA Reply brief.	1.6	480.00
40115037	03/18/22	Wiygul, Robert	Fulton County: Finish drafting SCOPA reply brief; revise same and email clients regarding same.	6.0	2,640.00
	03/18/22	Kotula, Kathleen	Review draft SCOPA reply brief	0.2	60.00
40115037	03/20/22	Kagedan, Eitan	Fulton County: Revise and discuss SCOPA Reply brief.	1.5	450.00
40115037	03/20/22	Wiygul, Robert	Fulton County: Review and analyze comments on SCOPA reply brief by OAG and E. Kagedan; emails and conference with E. Kagedan regarding revisions to same.	1.8	792.00
40115037	03/21/22	Arteaga, Alexandra	Fulton County: Review and analyze Reply Appellate Brief, check legal citations and quotations, and prepare tables of citations.	4.5	675.00
40115037	03/21/22	Kagedan, Eitan	Fulton County: Revise, finalize and manage filing of SCOPA Reply Brief.	2.8	840.00
40115037	03/21/22	Wiygul, Robert	Fulton County: Communications with E. Kagedan regarding client's comments on SCOPA reply brief and finalization of same.	0.3	132.00
40115037	03/23/22	Kagedan, Eitan	Fulton County: Review and revise letter to court with archival copy of SCOPA Reply brief.	0.2	60.00
40116274	05/17/22	Wiygul, Robert	Fulton County: Review SCOPA order directing oral argument and email clients regarding same.	0.2	88.00
40116274	05/24/22	Wiygul, Robert	Fulton County: Prepare for and conference with clients regarding SCOPA briefing order and Commonwealth Court decision overruling preliminary objection.	0.2	88.00
40116916	06/09/22	Wiygul, Robert	Fulton County: Draft supplemental brief addressing appellate jurisdiction.	3.9	1,716.00
40116916	06/10/22	Wiygul, Robert	Fulton County: Continue drafting supplemental brief addressing appellate jurisdiction.	7.0	3,080.00
40116916	06/11/22	Wiygul, Robert	Fulton County: Finish drafting supplemental brief addressing appellate jurisdiction; emails to clients and team regarding same.	1.9	836.00
	06/12/22	Kotula, Kathleen	Review draft of supplemental SCOPA brief addressing SCOPA jurisdiction	0.3	90.00
40116916	06/13/22	Kagedan, Eitan	Fulton County: Review draft Supplemental Appellate Brief.	1.1	330.00
40116916	06/14/22	Hill, John	Fulton County: Implement client's revisions to supplemental brief regarding Supreme Court's jurisdiction.	0.9	225.00
40116916	06/14/22	Kagedan, Eitan	Fulton County: Review edits to Supplemental brief.	0.4	120.00
40116916	06/15/22	Arteaga, Alexandra	Fulton County: Review, analyze, and cite check SCOPA brief addressing appellate jurisdiction and prepare tale of authorities for attorney review.	2.6	390.00
40116916	06/15/22	Hill, John	Fulton County: Revise supplemental appellate brief.	0.6	150.00
40116916	06/16/22	Hill, John	Fulton County: Implement R. Wiygul's revisions to supplemental appellate brief.	0.6	150.00
40116916	06/16/22	Kagedan, Eitan	Fulton County: Finalize and manage filing of supplemental brief.	0.3	90.00
40116916	06/16/22	Wiygul, Robert	Fulton County: Finalize supplemental brief addressing appellate jurisdiction.	1.1	484.00
40116916	06/21/22	Arteaga, Alexandra	Fulton County: Review for filing today Brief addressing Appellate Jurisdiction with original signatures.	0.8	120.00
40116916	06/21/22	Kagedan, Eitan	Fulton County: Prepare corrected filing of supplemental brief.	0.7	210.00

Exhibit G - Expenditures of Legal-Professional Time
[Supreme Court Appeal]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40116916	06/28/22	Wiygul, Robert	Fulton County: Review entry of appearance by T. Carroll for Petitioners and emails with clients and A. Thompson regarding same.	0.3	132.00
40116916	06/30/22	Wiygul, Robert	Attend weekly conference with clients, OAG, SUDC, and J. Matz to discuss status of Fulton County case and related election-law proceedings.	0.1	44.00
40117516	07/05/22	Arteaga, Alexandra	Fulton County: Review and analyze docket report and circulate court imposed deadlines.	0.2	30.00
40117516	07/05/22	Wiygul, Robert	Fulton County: Review oral argument notice from SCOPA and email clients regarding same.	0.2	88.00
40117516	07/07/22	Wiygul, Robert	Weekly conference call with clients, OAG, SUDC, and J. Matz regarding status of Fulton County case and related election-law developments.	0.1	44.00
40117516	07/15/22	Arteaga, Alexandra	Fulton County: Review and finalize for filing Acknowledgement of Argument Notice and circulate arguments dates internally.	0.7	105.00
40117516	07/15/22	Wiygul, Robert	Fulton County: Review supplemental disclosure statement by Justice Brobson and email clients regarding same.	0.3	132.00
40117516	07/20/22	Arteaga, Alexandra	Fulton County: Review and analyze docket report and circulate court imposed deadlines for attorney review.	0.3	45.00
40117516	07/20/22	Wiygul, Robert	Fulton County: Review letter from Prothonotary regarding appellees' overdue supplemental brief; email to clients regarding same.	0.3	132.00
40117516	07/21/22	Wiygul, Robert	Participate in weekly conference call with clients, OAG, and SUDC regarding Fulton County case and other matters.	0.1	44.00
40117516	07/21/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding case status, discovery strategy, and oral argument strategy.	0.3	132.00
40117516	07/26/22	Wiygul, Robert	Fulton County: Review letter to Petitioners' counsel from Prothonotary and email clients regarding same.	0.3	132.00
	07/26/22	Kotula, Kathleen	Review SCOPA correspondence re: Petitioner's failure to comply with notice to file supplemental brief	0.1	30.00
40117516	07/27/22	Wiygul, Robert	Fulton County: Email clients regarding recent filings and response to Petitioners' nunc pro tunc application for extension of time to file supplemental brief; conference with J. Hill regarding same.	0.4	176.00
	07/27/22	Kotula, Kathleen	Review Petitioners' application nunc pro tunc for additional time to file supplemental brief	0.1	30.00
40117516	07/28/22	Arteaga, Alexandra	Fulton County: Review and analyze court imposed deadlines and circulate updates record for attorney review.	0.3	45.00
40117516	07/28/22	Hill, John	Weekly conference with clients and election team co-counsel for update and strategy call regarding Fulton County case and other matters; follow-up conference with R. Wiygul regarding next steps.	0.1	44.00
40117516	07/28/22	Wiygul, Robert	Fulton County: Revise letter to Prothonotary responding to Petitioners' nunc pro tunc motion for extension of time to file supplemental appellate brief; email to clients regarding same.	0.2	88.00
40117516	07/28/22	Wiygul, Robert	Participate in weekly call with clients, OAG, SUDC, and J. Matz regarding Fulton County case and related matters; follow up call with J. Hill regarding next steps.	0.2	88.00
40117516	07/29/22	Arteaga, Alexandra	Fulton County: Review and finalize No Answer Letter to Motion Nunc Pro Tunc for Leave to File Appellees' Supplemental Brief.	0.3	45.00
	07/29/22	Kotula, Kathleen	Review draft no answer letter to Petitioners' application	0.1	30.00
40118122	08/10/22	Wiygul, Robert	Fulton County: Review letter from SCOPA Prothonotary to counsel for Petitioners; email to clients regarding same.	0.3	132.00
	08/10/22	Kotula, Kathleen	Review SCOPA letter to Petitioners' counsel	0.1	30.00

Exhibit G - Expenditures of Legal-Professional Time
[Supreme Court Appeal]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40118122	08/22/22	Wiygul, Robert	Fulton County: Telephone conference with B. Minner (Court Crier) regarding Supreme Court oral argument.	0.1	44.00
40118122	08/23/22	Wiygul, Robert	Fulton County: Review file and email A. Arteaga regarding creation of binder in preparation for oral argument.	1.1	484.00
40118122	08/24/22	Arteaga, Alexandra	Fulton County: Review and analyze materials for attorney review in preparation of upcoming oral argument.	0.4	60.00
40118763	09/01/22	Kagedan, Eitan	Fulton County: Plan and prepare for oral argument, including identification of key projects in advance of argument.	0.5	150.00
40118763	09/01/22	Kagedan, Eitan	Fulton County: Research caselaw supporting agency enjoining unauthorized conduct.	0.3	90.00
40118763	09/02/22	Kagedan, Eitan	Fulton County: Research issues related to forfeiture of argument on appeal.	0.5	150.00
40118763	09/02/22	Wiygul, Robert	Fulton County: Emails with team and client regarding moot of oral argument; begin examining briefing in preparation for moot.	0.5	220.00
40118763	09/05/22	Aronchick, Mark A.	Fulton County: Reviewing briefs in preparation for moot court.	3.5	1,540.00
40118763	09/06/22	Aronchick, Mark A.	Fulton County: Continuing preparation for moot court.	1.3	572.00
40118763	09/07/22	Aronchick, Mark A.	Fulton County: Reading through briefs for meeting with R. Wiygul.	1.0	440.00
40118763	09/07/22	Arteaga, Alexandra	Fulton County: Review, analyze, and identify caselaw cited in briefing and prepare report for attorney review in preparation for oral argument.	1.5	225.00
40118763	09/07/22	Kagedan, Eitan	Fulton County: Review Commonwealth Court and Supreme Court briefing to prepare key case binder and develop questions for moot to assist in preparation for oral argument.	3.5	1,050.00
40118763	09/08/22	Aronchick, Mark A.	Fulton County: Preparation for and moot court of R. Wiygul.	0.3	132.00
40118763	09/08/22	Arteaga, Alexandra	Fulton County: Review, identify, and gather case law cited in briefing, as well as statutes and rules in preparation for upcoming oral argument.	0.8	120.00
40118763	09/08/22	Kagedan, Eitan	Fulton County: Prepare for oral argument.	0.7	210.00
40118763	09/09/22	Hill, John	Fulton County: Attend oral argument moot.	1.2	300.00
40118763	09/09/22	Kagedan, Eitan	Fulton County: Prepare for and participate in moot.	1.4	420.00
40118763	09/09/22	Wiygul, Robert	Fulton County: Prepare for and conduct moot of Supreme Court oral argument.	3.9	1,716.00
	09/09/22	Boyer, Jacob	Participate in moot of R. Wiygul for argument in Supreme Court.	1.5	450.00
	09/09/22	Kotula, Kathleen	Participate in moot for SCOPA Fulton argument	1.5	450.00
	09/09/22	Fischer, Michael	Participate in oral argument moot	1.0	440.00
40118763	09/12/22	Kagedan, Eitan	Fulton County: Review Motion to Continue Oral Argument and related communications.	0.2	60.00
40118763	09/13/22	Arteaga, Alexandra	Fulton County: Review correspondence received by the court in connection with oral argument scheduled for 10/26	0.2	30.00
40118763	09/19/22	Arteaga, Alexandra	Fulton County: Review oral-argument counsel designations for RAW and submit to the court ahead of the 10/26 oral argument.	0.4	60.00
40118763	09/21/22	Kagedan, Eitan	Fulton County: Conduct research in support of agency's right to prospective injunctive relief.	0.3	90.00
40119322	10/19/22	Kagedan, Eitan	Fulton County: Research on preemptive injunctive relief in preparation for Supreme Court oral argument.	0.7	210.00
40119322	10/20/22	Aronchick, Mark A.	Fulton County: Review previous filings in connection with possibly mooting next week's argument.	0.8	352.00
40119322	10/20/22	Kagedan, Eitan	Fulton County: Prepare for Oral Argument on Appeal.	0.6	180.00

Exhibit G - Expenditures of Legal-Professional Time
[Supreme Court Appeal]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/21/22	Aronchick, Mark A.	Fulton County: Continued review of filings in connection with possibly mooted next week.	0.6	264.00
40119322	10/21/22	Kagedan, Eitan	Fulton County: Prepare for Oral Argument.	0.6	180.00
40119467	11/02/22	Hunter, Maria	Fulton County: Review, update, finalize and file Entry of Appearance of E. Kagedan.	0.4	60.00
40119467	11/02/22	Hunter, Maria	Fulton County: Communications with Pennsylvania Supreme Court regarding E. Kagedan's Entry of Appearance.	0.2	30.00

Totals	154.0	\$	50,336.00
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Time Keeper	Hours	Amount
Aronchick, Mark A.	7.50	\$ 3,300.00
Wiygul, Robert	66.30	\$ 29,172.00
Fischer, Michael	1.00	\$ 440.00
Kotula, Kathleen	3.20	\$ 960.00
Boyer, Jacob	1.50	\$ 450.00
Kagedan, Eitan	29.00	\$ 8,700.00
Hill, John	4.70	\$ 1,194.00
Arteaga, Alexandra	14.00	\$ 2,100.00
Ferrari, Kim	7.00	\$ 1,050.00
Hunter, Maria	19.80	\$ 2,970.00

EXHIBIT H

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40115643	04/19/22	Kagedan, Eitan	Fulton County: Review docket to confirm details surrounding Tom King's withdrawal of appearance.	0.2	60.00
40115643	04/19/22	Wiygul, Robert	Fulton County: Review praecipe to withdraw appearance of T. King's firm; emails with OAG regarding Fulton County meeting minutes indicating substitution of counsel; research Fulton County's presumptive new counsel (Lambert and Carroll), including federal court opinion sanctioning Lambert; email clients regarding same.	1.2	528.00
	04/19/22	Fischer, Michael	Review Fulton County Commissioners meeting minutes; research background of new counsel for Fulton County	0.5	220.00
40115643	04/21/22	Wiygul, Robert	Conference with clients, OAG, and SUDC regarding Fulton County's new counsel, Senator Dush's Right to Know requests, and related matters.	0.2	88.00
40116274	05/05/22	Wiygul, Robert	Weekly telephone conference with clients, OAG, and SUDC regarding proceedings against S. Lambert in Michigan and developments in related cases.	0.2	88.00
40118763	09/21/22	Kagedan, Eitan	Fulton County: Review materials related to Speckin inspection.	0.8	240.00
40118763	09/21/22	Wiygul, Robert	Fulton County: Review Fulton County's complaint against Dominion and accompanying Speckin Forensics report; telephone conference with S. Gallagher (Dominion's counsel) regarding same.	0.9	396.00
40118763	09/23/22	Kagedan, Eitan	Fulton County: Confer with Ryan Macias regarding Speckin inspection.	0.5	150.00
40118763	09/23/22	Kagedan, Eitan	Fulton County: Confer with R. Wiygul regarding response to Speckin inspection.	0.6	180.00
40118763	09/23/22	Kagedan, Eitan	Fulton County: Confer with client team regarding response to Speckin inspection.	0.5	150.00
40118763	09/23/22	Wiygul, Robert	Conferences with R. Macias and clients regarding Fulton County's complaint against Dominion and related third-party inspection; telephone conference with E. Kagedan regarding next steps.	2.3	1,012.00
	09/23/22	Kotula, Kathleen	Attend meeting re Fulton follow-up on Speckin inspection	0.5	150.00
40118763	09/24/22	Mascioli, Gianni	Fulton County: Call R. Wiygul to discuss research needed for potential contempt motion.	0.4	100.00
40118763	09/24/22	Mascioli, Gianni	Fulton County: Call R. Wiygul to discuss next steps and assistance needed with contempt motion.	0.4	100.00
40118763	09/26/22	Mascioli, Gianni	Fulton County: Research potential claims against opposing party in connection with potential contempt order.	0.8	200.00
40118763	09/26/22	Wiygul, Robert	Fulton County: Telephone conference with B. DeLone and S. Kirkpatrick regarding response to third-party inspection of voting machines; email to T. Gates regarding same.	0.4	176.00
40118763	09/27/22	Mascioli, Gianni	Fulton County: Research law governing civil contempt in Pennsylvania.	2.4	600.00
40118763	09/27/22	Mascioli, Gianni	Fulton County: Research law governing spoliation of evidence in Pennsylvania for potential contempt motion.	2.3	575.00
40118763	09/28/22	Kagedan, Eitan	Fulton County: Review research from Gianni Mascioli on standards for contempt and sanctions related to Speckin inspection in anticipation of drafting contempt motion.	0.9	270.00
40118763	09/28/22	Kagedan, Eitan	Fulton County: Draft Motion for Contempt.	1.2	360.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Draft memo to E. Kagedan and R. Wiygul summarizing research on civil contempt and spoliation of evidence.	1.8	450.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Call E. Kagedan to discuss additional research needed for contempt motion.	0.2	50.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Research compensatory remedies for civil contempt.	1.2	300.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40118763	09/28/22	Mascioli, Gianni	Fulton County: Research remedies for litigation misconduct.	1.2	300.00
40118763	09/28/22	Mascioli, Gianni	Fulton County: Research authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.2	300.00
40118763	09/28/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding contempt application.	0.4	176.00
40118763	09/29/22	Kagedan, Eitan	Fulton County: Draft Motion for Contempt.	6.1	1,830.00
40118763	09/29/22	Kagedan, Eitan	Fulton County: Review research findings in support of Motion for Contempt.	0.5	150.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Continue researching authority of Pennsylvania courts to impose dismissal with prejudice for litigation misconduct.	1.4	350.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Research Pennsylvania statutory and case law on available sanctions for preservation order violations.	1.7	425.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Prepare supplemental memo to E. Kagedan summarizing additional research on litigation misconduct and available sanctions therefor.	1.7	425.00
40118763	09/29/22	Mascioli, Gianni	Fulton County: Correspond further with E. Kagedan to elaborate on additional research in support of contempt motion.	0.3	75.00
40118763	09/30/22	Kagedan, Eitan	Fulton County: Complete and revise draft Motion for Contempt.	5.6	1,680.00
40119322	10/04/22	Kagedan, Eitan	Fulton County: Research to support executive agency's entitlement to prospective injunctive relief for Supreme Court oral argument.	1.3	390.00
40119322	10/06/22	Kagedan, Eitan	Fulton County: Reframe argument section of Motion for Contempt and Sanctions.	5.2	1,560.00
40119322	10/06/22	Mascioli, Gianni	Fulton County: Complete supplemental research on Pennsylvania courts' inherent authority to sanction violations of procedural and discovery orders to include in motion for contempt and sanctions.	1.3	325.00
40119322	10/06/22	Mascioli, Gianni	Fulton County: Draft section of motion for sanctions regarding Pennsylvania courts' inherent authority to sanction a party with dismissal with prejudice.	1.6	400.00
40119322	10/06/22	Mascioli, Gianni	Fulton County: Revise and line-edit introduction and contempt-related sections of draft motion for sanctions.	2.2	550.00
40119322	10/06/22	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher regarding Petitioners' Fulton County complaint against Dominion.	0.5	220.00
40119322	10/06/22	Wiygul, Robert	Fulton County: Telephone conference with Court Crier regarding upcoming oral argument; revise application to hold Petitioners in contempt.	0.8	352.00
40119322	10/07/22	Kagedan, Eitan	Fulton County: Draft Affidavit of Ryan Macias in support of Motion for Contempt.	1.2	360.00
40119322	10/07/22	Wiygul, Robert	Fulton County: Review draft of sanctions motion; research case law cited in same and additional case law regarding contempt and other authorities for sanctions; begin revising and supplementing contempt motion.	5.3	2,332.00
40119322	10/08/22	Wiygul, Robert	Fulton County: Continue revising and supplementing application to hold Petitioners in contempt.	13.8	6,072.00
40119322	10/09/22	Wiygul, Robert	Fulton County: Finish supplementing and revising motion for contempt and sanctions.	10.4	4,576.00
40119322	10/10/22	Wiygul, Robert	Fulton County: Further revise contempt application and email clients transmitting same.	0.6	264.00
40119322	10/12/22	Kagedan, Eitan	Fulton County: Review edits to Motion for Contempt and Sanctions.	0.7	210.00
40119322	10/12/22	Kagedan, Eitan	Fulton County: Consider additions and revisions to Motion for Contempt.	0.2	60.00
40119322	10/13/22	Kagedan, Eitan	Fulton County: Revise Macias declaration in support of Motion for Contempt.	1.2	360.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/13/22	Wiygul, Robert	Attend weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.2	88.00
	10/13/22	Boyer, Jacob	Attend weekly conference, which included discussion of Fulton County case and related matters.	0.2	60.00
	10/13/22	Mullen, Kathleen	Review and edit contempt application	1.5	450.00
40119322	10/14/22	Kagedan, Eitan	Fulton County: Review proposed edits and comments on Motion for Contempt.	0.4	120.00
	10/14/22	Kotula, Kathleen	Review draft contempt application	0.5	150.00
	10/15/22	Boyer, Jacob	Review and edit application to hold Petitioners in contempt	2.0	600.00
40119322	10/16/22	Wiygul, Robert	Fulton County: Revise application to hold Petitioners in contempt and support affidavit of R. Macias; email to R. Macias regarding same; draft verification of application.	4.3	1,892.00
40119322	10/17/22	Arteaga, Alexandra	Fulton County: Gather and review exhibits for Macias Affidavit in support of Motion for Contempt.	0.6	90.00
40119322	10/17/22	Wiygul, Robert	Fulton County: Review R. Macias's edits to affidavit in support of contempt application; videoconference with R. Macias regarding same; propose further revisions to affidavit and emails with R. Macias regarding same; emails with A. Arteaga regarding finalizing contempt motion for filing.	2.1	924.00
	10/17/22	Kotula, Kathleen	Review expert affidavit in support of contempt application	0.4	120.00
40119322	10/18/22	Arteaga, Alexandra	Fulton County: Review and revise exhibits re Motion for Sanctions.	0.5	75.00
40119322	10/18/22	Arteaga, Alexandra	Fulton County: Review and finalize for filing Motion for Sanctions and supporting exhibits.	0.9	135.00
40119322	10/18/22	Arteaga, Alexandra	Fulton County: Review and finalize verification re Motion for Sanctions.	0.2	30.00
40119322	10/18/22	Wiygul, Robert	Fulton County: Revise and finalize contempt application; communications with clients and A. Arteaga regarding same.	3.1	1,364.00
	10/18/22	Mullen, Kathleen	Review affidavit in support of contempt application	0.2	60.00
40119322	10/20/22	Kagedan, Eitan	Fulton County: Review Petitioners' submission in response to Application for Contempt.	0.2	60.00
	10/20/22	Kotula, Kathleen	Review Petitioners' application for relief for extension of time	0.2	60.00
	10/20/22	Kotula, Kathleen	Review SCOPA order denying application for extension of time	0.1	30.00
	10/21/22	Kotula, Kathleen	Review SCOPA order designating P.J. Cohn Jubelirer as Special Master	0.1	30.00
	10/21/22	Kotula, Kathleen	Review SCOPA order directing that appeal be submitted on briefs	0.1	30.00
40119322	10/24/22	Kagedan, Eitan	Fulton County: Develop discovery strategy for Motion for Contempt.	2.0	600.00
40119322	10/24/22	Kagedan, Eitan	Fulton County: Review and consider submission directed by Special Master's Scheduling Order.	2.3	690.00
40119322	10/24/22	Kagedan, Eitan	Fulton County: Draft memorandum of law on nature of contempt proceedings as requested by Special Master.	3.1	930.00
40119322	10/24/22	Mascioli, Gianni	Fulton County: Call E. Kagedan to discuss research questions to address ahead of scheduled hearing on motion for sanctions against opposing party.	0.1	25.00
40119322	10/24/22	Mascioli, Gianni	Fulton County: Prepare note to E. Kagedan summarizing certain research findings ahead of scheduled hearing on motion for sanctions against opposing party.	0.5	125.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/24/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding strategy and research for contempt proceeding; review Order by Special Master; email to clients regarding same; research contempt case law in preparation for drafting memorandum of law in compliance with Special Master's Order.	3.2	1,408.00
	10/24/22	Kotula, Kathleen	Review P.J. Cohn Jubelirer scheduling order	0.1	30.00
40119322	10/25/22	Kagedan, Eitan	Fulton County: Continue drafting memorandum of law on nature of contempt proceedings as requested by Special Master.	3.2	960.00
40119322	10/25/22	Kagedan, Eitan	Fulton County: Follow up research regarding anticipated issues in contempt proceedings.	0.8	240.00
40119322	10/25/22	Kagedan, Eitan	Fulton County: Draft discovery requests.	2.2	660.00
40119322	10/25/22	Wiygul, Robert	Fulton County: Telephone conference with A. Arteaga regarding prospective evidentiary hearing and obtaining subpoenas; email to Court staff regarding WebEx status conference; telephone conference with Dominion's outside counsel regarding status.	0.6	264.00
40119322	10/25/22	Wiygul, Robert	Fulton County: Revise memorandum of law required by October 24 Order.	1.4	616.00
649456	10/25/22	Mavroudis, Dimitri	Conference call with R. Wiygul regarding strategy related to Application for Contempt against Petitioner Fulton County.	0.4	176.00
	10/25/22	Boyer, Jacob	Review and edit memorandum of law in support application to hold Petitioners in contempt.	0.5	150.00
40119322	10/26/22	Arteaga, Alexandra	Fulton County: Review and cite check memo of law on nature of relief.	2.1	315.00
40119322	10/26/22	Arteaga, Alexandra	Fulton County: Review and analyze law on nature of relief, prepare Table of Authorities, and finalize for filing.	1.4	210.00
40119322	10/26/22	Arteaga, Alexandra	Fulton County: Review local rules re deposition subpoenas and contact the Commonwealth Court to obtain subpoenas.	0.6	90.00
40119322	10/26/22	Kagedan, Eitan	Fulton County: Review and edit Memorandum of Law concerning nature of relief sought.	1.9	570.00
40119322	10/26/22	Kagedan, Eitan	Fulton County: Review filings related to Motion for Contempt in preparation for discovery.	1.0	300.00
40119322	10/26/22	Wiygul, Robert	Fulton County: Revise and supplement memorandum of law required by October 24 Order; review comments by clients and OAG and further revise; finalize and file memorandum of law; review and analyze Petitioners' Answer to contempt application and memorandum of law regarding civil v. criminal contempt; emails to clients and R. Macias regarding same.	10.0	4,400.00
649456	10/26/22	Mavroudis, Dimitri	Review Respondent's Memorandum of Law on Nature for Relief in connection with the Application for Contempt against Petitioner Fulton County.	1.0	440.00
	10/26/22	Kotula, Kathleen	Review draft memorandum of law re nature of relief sought	0.3	90.00
	10/26/22	Mullen, Kathleen	Review draft brief re nature of relief sought	0.3	90.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Revise discovery requests in support of Motion for Contempt.	1.0	300.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Research concerning limits to scope of contempt proceedings and procedural requirements in preparation for status conference.	1.9	570.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Meet with client team to discuss issues related to Motion for Contempt.	0.8	240.00
40119322	10/27/22	Kagedan, Eitan	Fulton County: Prepare for, attend, and follow up regarding status conference on Motion for Contempt.	2.5	750.00
40119322	10/27/22	Mascioli, Gianni	Fulton County: Prepare note to E. Kagedan summarizing additional research findings ahead of hearing before Special Master.	0.6	150.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/27/22	Wiygul, Robert	Fulton County: Conference with clients and OAG in preparation for status conference; follow-up conference with E. Kagedan regarding same.	0.8	352.00
40119322	10/27/22	Wiygul, Robert	Fulton County: Prepare for and participate in status conference; follow-up conferences with E. Kagedan and R. Macias regarding scheduling and discovery issues; emails with Petitioners' counsel regarding scheduling issues.	3.0	1,320.00
40119322	10/27/22	Wiygul, Robert	Fulton County: Revise draft document requests relating to contempt proceeding.	1.0	440.00
949456	10/27/22	Mavroudis, Dimitri	Attend conference call with R. Wiygul and client regarding discovery strategy for Application for Contempt against Petitioner Fulton County and Court status conference.	0.6	264.00
949456	10/27/22	Mavroudis, Dimitri	Observe and take notes at virtual Court status conference.	0.6	264.00
949456	10/27/22	Mavroudis, Dimitri	Review correspondence from R. Wiygul regarding proposed discovery schedule.	0.5	220.00
949456	10/27/22	Mavroudis, Dimitri	Review Petitioners Memorandum of Law and Answer to Application for Contempt.	0.8	352.00
	10/27/22	Boyer, Jacob	Conference to prepare for status conference; attend status conference.	2.0	600.00
	10/27/22	Kotula, Kathleen	Attend meeting re strategy for Fulton hearing	0.5	150.00
	10/27/22	Kotula, Kathleen	Review Petitioners' filings (answer and brief)	0.4	120.00
	10/27/22	Kotula, Kathleen	Review draft email to Petitioners' counsel re: discovery/proceedings schedule	0.2	60.00
	10/27/22	Fischer, Michael	Call with R. Wiygul; participate in teleconference regarding legal strategy; review draft schedule; correspond with client and outside attorneys regarding strategy	1.5	660.00
40119322	10/28/22	Arteaga, Alexandra	Fulton County: Review and analyze Proposed Scheduling Order and finalize for filing	0.7	105.00
40119322	10/28/22	Arteaga, Alexandra	Fulton County: Review and analyze discovery requests and draft cover letter for service of the same.	0.2	30.00
40119322	10/28/22	Hunter, Maria	Fulton County: Review Order regarding Rule to Show Cause hearing and update matter calendar.	0.1	15.00
40119322	10/28/22	Hunter, Maria	Fulton County: Review communications from counsel regarding court requirements regarding transcript for hearing and communications with court reporters regarding availability.	0.2	30.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Call with opposing counsel concerning scheduling issue; draft proposed scheduling order.	2.8	840.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Draft proposed factual stipulations.	3.3	990.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Research concerning potential privilege claims by Petitioners.	0.8	240.00
40119322	10/28/22	Kagedan, Eitan	Fulton County: Review Special Master's scheduling order and related communications.	0.4	120.00
40119322	10/28/22	Wiygul, Robert	Fulton County: Prepare for and conduct telephone conference with counsel for Petitioners and Intervenor regarding schedule; draft submission to Special Master regarding same; communications with clients regarding same; review Petitioners' submission and email clients regarding same; revise document requests and communicate with clients regarding same; finalize and serve document requests; review scheduling Order entered by Court and communicate with clients regarding same; serve Order on Petitioners' counsel and draft and file proof of service.	7.8	3,432.00
649456	10/28/22	Mavroudis, Dimitri	Attend conference call with opposing counsel and counsel for Dominion regarding meet and confer relates to discovery prior to hearing on the Application for Contempt against Petitioner Fulton County.	1.0	440.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
649456	10/28/22	Mavroudis, Dimitri	Review Requests for Documents in support of Application for Contempt against Petitioner Fulton County.	0.7	308.00
649456	10/28/22	Mavroudis, Dimitri	Review the Secretary's Proposed Schedule.	0.3	132.00
649456	10/28/22	Mavroudis, Dimitri	Review Propose Schedule Submission to the Court.	0.7	308.00
649456	10/28/22	Mavroudis, Dimitri	Review Court Order setting schedule for discovery to be taken in advance of the hearing regarding the Application for Contempt against Petitioner Fulton County.	0.4	176.00
	10/28/22	Kotula, Kathleen	Review draft proposed schedule	0.2	60.00
	10/28/22	Kotula, Kathleen	Review Petitioners' filing re discovery and schedule	0.2	60.00
	10/28/22	Kotula, Kathleen	Review draft requests for production of documents	0.3	90.00
	10/28/22	Kotula, Kathleen	Review court order re scheduling	0.1	30.00
	10/28/22	Fischer, Michael	Correspond with client regarding strategy; calls with client and outside attorneys regarding upcoming hearing	0.5	220.00
40119322	10/29/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' contempt-related filings to develop discovery requests and rebuttal arguments.	2.5	1,100.00
40119322	10/30/22	Hunter, Maria	Fulton County: Review correspondence from counsel regarding depositions.	0.1	15.00
40119322	10/30/22	Hunter, Maria	Fulton County: Communications with Court Reporting Agency scheduling videographer, court reporter and exhibit technician for remote depositions.	0.3	45.00
40119322	10/30/22	Hunter, Maria	Fulton County: Draft Notice of Remote Video Deposition directed to S. Ulsh pursuant to Pennsylvania rules.	0.5	75.00
40119322	10/30/22	Kagedan, Eitan	Fulton County: Complete drafts of Interrogatories and Requests for Admission.	1.8	540.00
40119322	10/30/22	Wiygul, Robert	Fulton County: Draft and revise interrogatories and requests for admission and research anticipated privilege issues; communications with E. Kagedan regarding interrogatories and requests for admission.	6.2	2,728.00
40119322	10/30/22	Wiygul, Robert	Fulton County: Email M. Hunter regarding video deposition notices directed to Commissioners; telephone conferences with E. Kagedan regarding next steps in assembling interrogatories and requests for admissions and strategy for responding to Petitioners' anticipated objections; revise deposition notice and communicate with M. Hunter regarding same.	1.4	616.00
	10/30/22	Boyer, Jacob	Review and edit discovery.	0.5	150.00
40119322	10/31/22	Hunter, Maria	Fulton County: Various communications with Frontino Reporting regarding deposition and hearing logistics.	0.3	45.00
40119322	10/31/22	Hunter, Maria	Fulton County: Review, update, finalize and submit Notices of Remote Video depositions directed to S. Ulsh, P. Shives and R. Bunch.	1.1	165.00
40119322	10/31/22	Hunter, Maria	Fulton County: Review, update, and finalize discovery requests.	0.8	120.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Draft responses to Fulton County's written discovery requests.	4.8	1,440.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Review, revise, and finalize Interrogatories, Requests for Admission, and Proposed Deposition Questions.	2.5	750.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Review and consider responses to Fulton County's discovery requests to Dominion and the Secretary.	1.8	540.00
40119322	10/31/22	Kagedan, Eitan	Fulton County: Research to support motion to compel discovery.	0.6	180.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119322	10/31/22	Wiygul, Robert	Fulton County: Telephone conference with R. Macias regarding Petitioners' discovery requests and schedule for preparing for evidentiary hearing.	0.4	176.00
40119322	10/31/22	Wiygul, Robert	Fulton County: Revise, supplement, and finalize interrogatories, requests for admission, proposed deposition questions, and notices of deposition directed to Fulton County Commissioners; communications with clients and E. Kagedan regarding same; review emails from "AttorneyLambert" email address purporting to contain discovery requests and analyze same; communications with clients and E. Kagedan regarding same.	6.9	3,036.00
	10/31/22	Kotula, Kathleen	Review draft discovery documents (depositions, admissions, interrogatories)	0.3	90.00
	10/31/22	Kotula, Kathleen	Review Petitioners' discovery requests	0.5	150.00
	10/31/22	Mullen, Kathleen	Reviewed discovery requests	0.3	90.00
	10/31/22	Fischer, Michael	Review and edit discovery requests	0.5	220.00
40119467	11/01/22	Hunter, Maria	Fulton County: Various communications with Frontino Reporting regarding court reporter for evidentiary hearing.	0.2	30.00
40119467	11/01/22	Hunter, Maria	Fulton County: Draft Notices to Attend directed to R. Bunch, S. Ulsh and P. Shives.	0.2	30.00
40119467	11/01/22	Kagedan, Eitan	Fulton County: Draft responses to Petitioners' Interrogatories and Requests for Admission.	2.8	840.00
40119467	11/01/22	Kagedan, Eitan	Fulton County: Develop strategy for completing discovery and litigating discovery issues.	0.4	120.00
40119467	11/01/22	Kagedan, Eitan	Fulton County: Draft Motion to Compel Deposition Appearances.	3.2	960.00
40119467	11/02/22	Hunter, Maria	Fulton County: Prepare copies of exhibits for potential use at hearing.	1.4	210.00
40119467	11/02/22	Hunter, Maria	Fulton County: Review, update, and finalize Secretary's Responses and Objections to Petitioners' Requests for Discovery.	0.7	105.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Revise and finalize written discovery responses.	1.4	420.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Review and analyze Petitioners' Application for Injunction and plan response.	3.3	990.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Draft and revise verifications for filings.	0.3	90.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Research concerning scope and contours of deliberative process privilege in response to Petitioners' filings.	0.5	150.00
40119467	11/02/22	Kagedan, Eitan	Fulton County: Revise Motion to Compel Deposition Appearances per R. Wiygul's comments.	2.1	630.00
40119467	11/02/22	Wiygul, Robert	Fulton County: Review and analyze SCOPA order referring Petitioners' application to enjoin discovery to Special Master and consider next steps; email clients regarding same.	0.6	264.00
40119467	11/02/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding SCOPA order reimposing discovery schedule and next steps.	0.3	132.00
40119467	11/02/22	Wiygul, Robert	Fulton County: Review and revise draft responses to Petitioners' discovery responses; finalize and serve requests; review and analyze Petitioners' emergency application to enjoin discovery and email clients regarding same; review Justice Wecht's order temporarily enjoining discovery and email clients regarding same.	4.1	1,804.00
649606	11/02/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding preparation for evidentiary hearing related to the Secretary's application for contempt.	0.1	44.00

Exhibit H - Expenditures of Legal-Professional Time
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HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
	11/02/22	Kotula, Kathleen	Review draft responses and objections to Petitioners' discovery requests	0.3	90.00
	11/02/22	Kotula, Kathleen	Review Petitioners' application for relief re discovery	0.3	90.00
	11/02/22	Kotula, Kathleen	Review Justice Wecht order re administrative stay	0.1	30.00
	11/02/22	Kotula, Kathleen	Review SCOPA order re deadlines	0.1	30.00
	11/02/22	Fischer, Michael	Review and edit motion to compel	0.3	110.00
40119467	11/03/22	Hunter, Maria	Fulton County: Review, update, finalize and file Motion to Compel Depositions and prepare exhibits in support.	2.2	330.00
40119467	11/03/22	Hunter, Maria	Fulton County: Various communications with counsel and Court Reporting Agency regarding depositions.	1.3	195.00
40119467	11/03/22	Hunter, Maria	Fulton County: Various communications with Frontino regarding court reporter for evidentiary hearing.	0.3	45.00
40119467	11/03/22	Hunter, Maria	Fulton County: Review, update, and finalize Notice to the Court regarding Petitioners' Response and Objections to the Secretary's discovery.	0.6	90.00
40119467	11/03/22	Hunter, Maria	Fulton County: Review and update documents designated for potential use at evidentiary hearing.	1.6	240.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Review and incorporate revisions to motion to compel depositions.	1.6	480.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Review strategy notes for upcoming status conference.	0.2	60.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Continue researching contours of deliberative process privilege in response to Petitioners' filings.	1.1	330.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Review Petitioners' responses to the Secretary's discovery requests and draft notice concerning deficiencies.	1.3	390.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Identify and prepare exhibits for evidentiary hearing.	2.8	840.00
40119467	11/03/22	Kagedan, Eitan	Fulton County: Draft application for discovery sanctions.	4.3	1,290.00
40119467	11/03/22	Wiygul, Robert	Fulton County: Review and analyze Petitioners' discovery responses; conference with E. Kagedan regarding Notice to the Court; revise Notice to Court and email clients regarding same; review Special Master's Order; emails with clients regarding same; revise and serve Notices to Attend the evidentiary hearing and email clients regarding same.	1.8	792.00
40119467	11/03/22	Wiygul, Robert	Fulton County: Revise verifications of discovery responses and email clients regarding same; revise motion to compel depositions and email clients regarding same.	2.1	924.00
649606	11/03/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding attendance at hearing before the Special Master.	0.1	44.00
649606	11/03/22	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding Special Master Order for discovery and status conference attendance.	0.2	88.00
649606	11/03/22	Mavroudis, Dimitri	Review and analyze Special Master's Order regarding pre-hearing discovery.	0.6	264.00
649606	11/03/22	Mavroudis, Dimitri	Review motion to compel depositions of Commissioners Ulsh, Bunch, and Shives.	0.6	264.00
649606	11/03/22	Mavroudis, Dimitri	Review Petitioners Objections and Responses to written discovery requests.	0.8	352.00
	11/03/22	Mullen, Kathleen	Review draft motion to compel depositions	0.1	30.00
	11/03/22	Kotula, Kathleen	Review draft notice re Petitioners' responses and objections to discovery	0.3	90.00
	11/03/22	Kotula, Kathleen	Review court order re Secretary's emergency application to compel	0.1	30.00
40119467	11/04/22	Hunter, Maria	Fulton County: Review Commonwealth Court protocols for Court Reporters, and communications with counsel and Agency regarding same.	0.9	135.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/04/22	Hunter, Maria	Fulton County: Coordinate tech systems for Status Conference call with Court.	0.3	45.00
40119467	11/04/22	Hunter, Maria	Fulton County: Review, update, finalize and file Application for Discovery Sanctions.	1.3	195.00
40119467	11/04/22	Hunter, Maria	Fulton County: Communications with Court Reporter and counsel regarding Telephonic Status Conference.	0.2	30.00
40119467	11/04/22	Kagedan, Eitan	Fulton County: Continue drafting application for discovery sanctions.	4.7	1,410.00
40119467	11/04/22	Kagedan, Eitan	Fulton County: Review Petitioners' filing Motion for Predicate Legal Rulings and prepare for status conference.	4.1	1,230.00
40119467	11/04/22	Wiygul, Robert	Fulton County: Prepare for and attend status conference; communications with J. Boyer and E. Kagedan regarding next steps; email to clients regarding status conference.	1.8	792.00
40119467	11/04/22	Wiygul, Robert	Fulton County: Revise and supplement motion for discovery sanctions and communicate with E. Kagedan and clients regarding same.	1.8	792.00
40119467	11/04/22	Wiygul, Robert	Fulton County: Review and analyze order from Special Master and email clients regarding same.	0.4	176.00
	11/04/22	Boyer, Jacob	Attend status conference; conference with co-counsel about next steps.; review and edit motion for sanctions.	2.0	600.00
	11/04/22	Kotula, Kathleen	Review court order re objections to discovery and sanctions	0.1	30.00
	11/04/22	Mullen, Kathleen	Review motion for discovery sanctions	0.1	30.00
	11/04/22	Fischer, Michael	Correspond with client and outside counsel regarding strategy; calls with client and outside counsel: review Special Master	0.5	220.00
40119467	11/05/22	Hunter, Maria	Fulton County: Review Order issued post-Status Conference and coordinate Court Reporting services for depositions.	0.5	75.00
40119467	11/05/22	Hunter, Maria	Fulton County: Review and update documents for potential use at Evidentiary Hearing.	0.5	75.00
40119467	11/05/22	Kagedan, Eitan	Fulton County: Draft outline for examination of expert witness Ryan Macias.	2.6	780.00
40119467	11/05/22	Wiygul, Robert	Fulton County: Emails and telephone conference with R. Macias regarding logistics and substance of testimony at evidentiary hearing.	0.5	220.00
40119467	11/05/22	Wiygul, Robert	Fulton County: Review and analyze potential deposition and hearing exhibits in preparation for depositions and hearings and filing of exhibit list.	2.2	968.00
40119467	11/06/22	Kagedan, Eitan	Fulton County: Finish drafting expert examination outline and videoconference with Ryan Macias to prepare for hearing.	6.0	1,800.00
40119467	11/06/22	Kagedan, Eitan	Fulton County: Identify and prepare additional exhibits for evidentiary hearing.	1.6	480.00
40119467	11/06/22	Wiygul, Robert	Fulton County: Review outline of R. Macias examination; conference with R. Macias regarding testimony at evidentiary hearing; conference with E. Kagedan regarding revisions to outline of R. Macias examination.	1.7	748.00
40119467	11/07/22	Hill, John	Fulton County: Revise response in opposition to Petitioners' emergency application for injunction filed in Pa. Supreme Court.	0.5	125.00
40119467	11/07/22	Hunter, Maria	Fulton County: Various communications with Frontino regarding Court Reporter for Evidentiary Hearing.	0.2	30.00
40119467	11/07/22	Hunter, Maria	Fulton County: Review of transcript of November 4 Status Conference.	0.2	30.00
40119467	11/07/22	Hunter, Maria	Fulton County: Review of Pa. Supreme Court Letter scheduling deadline for Response to Petitioners' Emergency Application for injunction.	0.1	15.00
40119467	11/07/22	Hunter, Maria	Fulton County: Review and update list of Secretary's Hearing Exhibits.	0.7	105.00
40119467	11/07/22	Kagedan, Eitan	Fulton County: Draft Exhibit and Witness List.	1.0	300.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/07/22	Kagedan, Eitan	Fulton County: Prepare for examination of R. Macias and videoconference with R. Macias regarding same.	2.5	750.00
40119467	11/07/22	Wiygul, Robert	Conference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	0.2	88.00
40119467	11/07/22	Wiygul, Robert	Fulton County: Videoconference with R. Macias to prepare for hearing testimony; conference with E. Kagedan regarding revisions to witness and exhibit lists and estimate of time needed to present case.	1.4	616.00
	11/07/22	Boyer, Jacob	Conference with co-counsel; review and edit application for relief.	1.0	300.00
	11/07/22	Kotula, Kathleen	Review draft answer in opposition to emergency application to enjoin depositions	0.3	90.00
	11/07/22	Kotula, Kathleen	Review draft application for contempt	0.4	120.00
	11/07/22	Mullen, Kathleen	Draft declaration for J. Marks in response to allegations in Petitioners' Emergency Application for Relief	0.4	120.00
	11/07/22	Mullen, Kathleen	Review answer in opposition to Petitioners' Emergency Application for Relief	0.2	60.00
	11/07/22	Mullen, Kathleen	Review and edit application for contempt for violation of Special Master's Order	0.2	60.00
	11/07/22	Fischer, Michael	Review contempt motion; teleconference with client and outside counsel regarding upcoming hearing	0.5	220.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file The Secretary's Exhibit and Witness List.	0.6	90.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review and update exhibits and other materials for potential use at hearing.	1.6	240.00
40119467	11/08/22	Hunter, Maria	Fulton County: Communications with Clerk of Court regarding exhibit assembly and presentation preference.	0.1	15.00
40119467	11/08/22	Hunter, Maria	Fulton County: Prepare archival paper copies of Secretary's filings since October 21, 2022 for delivery to Commonwealth Court.	0.5	75.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Application for Relief Concerning Evidentiary Hearing.	0.8	120.00
40119467	11/08/22	Hunter, Maria	Prepare trial notebook for evidentiary hearing at counsel's direction.	1.4	210.00
40119467	11/08/22	Hunter, Maria	Fulton County: Review and update hearing outline for examination of Commissioners with references to hearing exhibits.	1.2	180.00
40119467	11/08/22	Hunter, Maria	Fulton County: Travel from Narberth to Harrisburg for evidentiary hearing.	1.5	225.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Prepare for evidentiary hearing, including review of examination outlines, preparation of documentary materials.	5.0	1,500.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Manage filing of exhibit and witness lists and preparation of copies of exhibits for evidentiary hearing.	1.4	420.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Draft Applications for order requiring Petitioners' counsel to verify that Commissioners have been provided with Notices to Attend evidentiary hearing and related orders.	0.8	240.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Research issues related to Petitioners' Motion to Suspend Proceedings.	0.4	120.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Travel to Harrisburg.	2.0	600.00
40119467	11/08/22	Kagedan, Eitan	Fulton County: Analyze exhibits to identify those for which to seek lay foundation and admission at evidentiary hearing.	0.4	120.00
40119467	11/08/22	Wiygul, Robert	Fulton County: Attend conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40119467	11/08/22	Wiygul, Robert	Fulton County: Revise application for relief regarding evidentiary hearing and email clients regarding same.	0.9	396.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/08/22	Wiygul, Robert	Fulton County: Review potential exhibits and examination outline and conference with team in preparation for evidentiary hearing (including travel between Philadelphia and Harrisburg).	3.5	1,540.00
649606	11/08/22	Mavroudis, Dimitri	Review outline for the examination of Fulton County Commissioner witnesses.	0.8	352.00
	11/08/22	Boyer, Jacob	Conference with co-counsel, which included discussion of Fulton County case.	0.1	30.00
	11/08/22	Kotula, Kathleen	Review Petitioners' answer to application for contempt	0.3	90.00
	11/08/22	Kotula, Kathleen	Review draft supplemental application for sanctions	0.3	90.00
	11/08/22	Kotula, Kathleen	Review court order denying Petitioners' application for relief	0.1	30.00
	11/08/22	Mullen, Kathleen	Review answer to application for contempt	0.1	30.00
	11/08/22	Fischer, Michael	Correspond with client and outside counsel regarding hearing; review Special Master order; review draft application regarding notice to Fulton County witnesses; review answer filed by Fulton County	1.0	440.00
	11/08/22	Fischer, Michael	Correspond with client and outside counsel regarding possible bench warrants; research statute addressing immunity from prosecution for election officials	0.5	220.00
40119467	11/09/22	Hunter, Maria	Plan for and attend Evidentiary Hearing on Application for Contempt.	10.0	1,500.00
40119467	11/09/22	Kagedan, Eitan	Fulton County: Prepare, appear for, and follow up regarding evidentiary hearing.	10.5	3,150.00
40119467	11/09/22	Wiygul, Robert	Fulton County: Prepare for and participate in evidentiary hearing; conference with co-counsel regarding strategy; conference with R. Macias regarding expert testimony.	10.9	4,796.00
649606	11/09/22	Mavroudis, Dimitri	Travel to and attend evidentiary hearing in Harrisburg before the Special Master regarding the Secretary of the Commonwealth's Application for Contempt.	13.0	5,720.00
40119467	11/10/22	Hunter, Maria	Fulton County: Plan for and attend second day of Evidentiary Hearing.	11.5	1,725.00
40119467	11/10/22	Hunter, Maria	Fulton County: Travel from Harrisburg to Narberth following evidentiary hearing.	1.8	270.00
40119467	11/10/22	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning Evidentiary Hearing (including travel from Harrisburg to Philadelphia).	14.0	4,200.00
40119467	11/10/22	Wiygul, Robert	Fulton County: Prepare for and attend second day of evidentiary hearing (including travel from Harrisburg to Philadelphia).	13.1	5,764.00
649606	11/10/22	Mavroudis, Dimitri	Observe via webcast evidentiary hearing in Harrisburg before the Special Master regarding the Secretary of the Commonwealth's Application for Contempt.	2.8	1,232.00
40119467	11/11/22	Hill, John	Fulton County: Research and analyze issues arising during contempt hearing regarding ultra vires actions of Commissioners Ulsh and Bunch in preparation for drafting post-hearing submission.	2.5	625.00
40119467	11/11/22	Hunter, Maria	Fulton Hearing: Post-Hearing organization of materials used at hearing in Harrisburg.	0.5	75.00
40119467	11/11/22	Hunter, Maria	Fulton County: Communications with Frontino Reporting regarding Court Reporter and exhibit tech for continued Evidentiary Hearing, scheduled for Monday, November 14, 2022.	0.4	60.00
40119467	11/11/22	Hunter, Maria	Fulton County: Review of Court Orders regarding continued Evidentiary Hearing and regarding preservation of key access log document.	0.2	30.00
40119467	11/11/22	Hunter, Maria	Fulton County: Upload the Secretary's hearing exhibits to Court's site for continued hearing.	0.1	15.00
40119467	11/11/22	Kagedan, Eitan	Fulton County: Begin drafting Proposed Findings of Fact.	6.8	2,040.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Telephone conference with M. Fischer regarding evidentiary hearing and next steps.	0.3	132.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/11/22	Wiygul, Robert	Fulton County: Telephone conference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.3	132.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Email court staff regarding access needed to upload exhibits and need for trial tech; email R. Macias following up on hearing.	0.3	132.00
40119467	11/11/22	Wiygul, Robert	Fulton County: Begin reviewing and annotating hearing transcripts in preparation for drafting post-hearing submission; research case law regarding Fifth Amendment and adverse-inference issues to address in post-hearing submission.	5.1	2,244.00
	11/11/22	Fischer, Michael	Teleconference with client and outside counsel regarding hearing	0.5	220.00
40119467	11/12/22	Kagedan, Eitan	Fulton County: Continue drafting Proposed Findings of Fact.	4.4	1,320.00
40119467	11/12/22	Wiygul, Robert	Fulton County: Continue reviewing and annotating hearing transcripts in preparation for drafting post-hearing brief and conference with E. Kagedan regarding draft of proposed findings of fact; research implications of voting-machine inspections' having been conducted without a vote of the Board of Elections.	3.4	1,496.00
40119467	11/13/22	Kagedan, Eitan	Fulton County: Continuing drafting and revising Proposed Findings of Fact.	10.7	3,210.00
40119467	11/13/22	Wiygul, Robert	Fulton County: Research unclean hands doctrine as basis for dismissing lawsuit; analyze and annotate Petitioners' briefs before Supreme Court and Special Master regarding contempt issues in preparation for drafting argument section of post-hearing submission; prepare for examination of R. Bunch.	5.1	2,244.00
40119467	11/14/22	Hunter, Maria	Fulton County: Communications with Court Clerk regarding transcript of October 27, 2022 Status Conference.	0.1	15.00
40119467	11/14/22	Hunter, Maria	Fulton County: Review of transcript of October 27, 2022 Status Conference.	0.1	15.00
40119467	11/14/22	Hunter, Maria	Fulton County: Draft correspondence to Court enclosing archival copies of filings.	0.1	15.00
40119467	11/14/22	Hunter, Maria	Fulton County: Review of Order extending deadline for post-hearing submissions and update matter calendar.	0.3	45.00
40119467	11/14/22	Hunter, Maria	Fulton County: Review and cite-check of record references in the Secretary's draft proposed findings of fact.	0.8	120.00
40119467	11/14/22	Kagedan, Eitan	Fulton County: Attend evidentiary hearing on Application for Contempt.	3.5	1,050.00
40119467	11/14/22	Kagedan, Eitan	Fulton County: Revise partial draft of Post-Hearing submission.	5.7	1,710.00
40119467	11/14/22	Wiygul, Robert	Fulton County: Draft outline and prepare for examination of R. Bunch; attend third day of evidentiary hearing.	4.9	2,156.00
40119467	11/14/22	Wiygul, Robert	Fulton County: Emails with T. Carroll regarding key access log; communications with E. Kagedan regarding same; conduct initial review of draft proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing elements of contempt.	6.7	2,948.00
40119467	11/15/22	Hill, John	Fulton County: Confer with R. Wiygul regarding contempt proceeding in preparation for review of post-hearing submission.	0.2	50.00
40119467	11/15/22	Hill, John	Fulton County: Review and analyze draft post-hearing submission.	0.5	125.00
40119467	11/15/22	Hunter, Maria	Fulton County: Review of redacted copy of November 10, 2022 hearing transcript.	0.1	15.00
40119467	11/15/22	Hunter, Maria	Fulton County: Review, cite-check, and revise references to case law and record in Argument section of post-hearing submission.	1.1	165.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/15/22	Hunter, Maria	Fulton County: Prepare exhibit in support of the Secretary's post-hearing submission.	0.1	15.00
40119467	11/15/22	Kagedan, Eitan	Fulton County: Review and revise post-hearing submission and findings of fact.	6.2	1,860.00
40119467	11/15/22	Kagedan, Eitan	Fulton County: Research on Fifth Amendment protections with respect to responses to document requests and subpoenas in preparation for responding to Petitioners' argument against admission of key access log.	1.0	300.00
40119467	11/15/22	Wiygul, Robert	Fulton County: Additional emails with T. Carroll regarding admission of key access log; review and revise proposed findings of fact; draft sub-sections of legal argument section of post-hearing submission addressing why Petitioners should pay the Secretary's costs and fees, why Petitioners should be required to relinquish custody of the voting machines, and why the Secretary's Exhibit 1 should be admitted into evidence; email to clients transmitting draft of post-hearing submission; communications with E. Kagedan regarding further revisions to post-hearing submission.	9.4	4,136.00
	11/15/22	Mullen, Kathleen	Review and edit post-hearing submission	2.2	660.00
40119467	11/16/22	Hunter, Maria	Fulton County: Review hearing notes regarding length of cross-examination of expert R. Macias for inclusion in Secretary's post-hearing submission.	0.2	30.00
40119467	11/16/22	Kagedan, Eitan	Fulton County: Finalize post-hearing submission.	0.8	240.00
40119467	11/16/22	Kagedan, Eitan	Fulton County: Review Petitioners' post-hearing filing.	0.9	270.00
40119467	11/16/22	Wiygul, Robert	Fulton County: Revise, supplement by adding introduction, and file post-hearing submission; communications with E. Kagedan and clients regarding same; review Dominion's post-hearing submission and email clients regarding same.	3.5	1,540.00
649606	11/16/22	Mavroudis, Dimitri	Review draft Post-Hearing submission.	1.4	616.00
	11/16/22	Boyer, Jacob	Review and edit Post-Hearing submission.	2.0	600.00
	11/16/22	Kotula, Kathleen	Review draft post-hearing submission	0.8	240.00
	11/16/22	Kotula, Kathleen	Review Petitioners' post-hearing submission	0.4	120.00
	11/16/22	Mullen, Kathleen	Review Petitioners' PPOF/Conclusions of law	0.2	60.00
40119467	11/17/22	Kagedan, Eitan	Revise application to admit Key Access Log into evidence.	1.2	360.00
40119467	11/17/22	Wiygul, Robert	Fulton County: Draft and revise application to admit key access log or for discovery sanctions; communications with E. Kagedan regarding same; review Special Master's order regarding evidentiary issues and email clients regarding same; emails with clients regarding draft application to admit key access log or for discovery sanctions.	3.9	1,716.00
	11/17/22	Kotula, Kathleen	Review court order	0.1	30.00
	11/17/22	Kotula, Kathleen	Review draft supplemental application for discovery sanctions	0.3	90.00
	11/17/22	Mullen, Kathleen	Review Supplemental Application to Admit Evidence or Impose Discovery Sanctions	0.2	60.00
	11/17/22	Fischer, Michael	Review and edit application for admission of key access log; correspond regarding status of litigation with other OAG attorneys	0.5	220.00
40119467	11/18/22	Hill, John	Fulton County: Review and comment on updated draft of post-hearing submission.	0.3	75.00
40119467	11/18/22	Kagedan, Eitan	Fulton County: Review and comment on revised Application to Admit Key Access Log into evidence.	0.7	210.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40119467	11/18/22	Wiygul, Robert	Fulton County: Further revise application regarding key access log per M. Fischer's comments and Special Master's Order dated November 17, 2022; email to clients regarding same; finalize and file same; email same to court staff.	1.3	572.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Review Petitioners' response to application to admit key access log and email clients regarding same; review Order granting application to admit and email clients regarding same.	0.3	132.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Review Order disposing of applications for discovery sanctions and relief for violations of Special Master's Orders and email clients regarding same.	0.3	132.00
40119467	11/18/22	Wiygul, Robert	Fulton County: Initial review of Special Master's Report and Recommendations; emails with clients regarding same.	0.8	352.00
	11/18/22	Boyer, Jacob	Review Report and Recommendation.	1.0	300.00
	11/18/22	Kotula, Kathleen	Review Petitioners' response to application to admit key access log	0.1	30.00
	11/18/22	Kotula, Kathleen	Review court order re key access log	0.1	30.00
	11/18/22	Kotula, Kathleen	Review court order re application for discovery sanctions	0.1	30.00
	11/18/22	Kotula, Kathleen	Review court's report and recommendations	0.8	240.00
40119467	11/19/22	Wiygul, Robert	Fulton County: Detailed review and analysis of Special Master's Report and Recommendations; emails with clients regarding same.	0.9	396.00
	11/19/22	Fischer, Michael	Review report & recommendation	0.8	330.00
40119467	11/20/22	Kagedan, Eitan	Fulton County: Review Special Master's Report and Recommendation.	1.1	330.00
40119467	11/21/22	Kagedan, Eitan	Review and analyze Special Master's Report and Recommendation.	0.9	270.00
40119467	11/22/22	Hunter, Maria	Fulton County: Review of Order regarding Application for Discovery Sanctions and update matter calendar regarding submission of supporting documentation.	0.2	30.00
40119467	11/22/22	Wiygul, Robert	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County and related cases.	0.2	88.00
40119467	11/29/22	Kagedan, Eitan	Fulton County: Analyze hearing transcripts to identify portions for use in anticipated Pa. Supreme Court submission.	2.8	840.00
40120477	12/01/22	Kagedan, Eitan	Fulton County: Assess basis for potential criminal referral.	1.0	300.00
40120477	12/01/22	Wiygul, Robert	Fulton County: Videoconference with OAG attorneys regarding ethical issues involving Petitioners' counsel.	0.7	308.00
40120477	12/01/22	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding evidence supporting application for fees.	0.3	132.00
	12/01/22	Boyer, Jacob	Conference regarding ethical issues involving Petitioners' counsel.	0.7	210.00
40120477	12/04/22	Hunter, Maria	Fulton County: Review and analysis of vendor invoices relating to depositions in support of application for fees.	0.5	75.00
40120477	12/05/22	Hunter, Maria	Fulton County: Review and analysis of Court Reporter invoice and copying invoices for work done for depositions in support of application for fees.	0.3	45.00
40120477	12/06/22	Hunter, Maria	Fulton County: Communications with team regarding preparation of application for fees relating to depositions.	0.5	75.00
40120477	12/06/22	Kagedan, Eitan	Fulton County: Research requirements for fee application.	0.5	150.00
40120477	12/07/22	Hunter, Maria	Fulton County: Review and revise draft M. Hunter Affidavit in Support of Application for deposition-related fees and costs.	0.6	90.00

Exhibit H - Expenditures of Legal-Professional Time
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HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40120477	12/07/22	Kagedan, Eitan	Fulton County: Review and revise draft Affidavits and fee application.	1.1	330.00
40120477	12/07/22	Wiygul, Robert	Fulton County: Draft application for award of deposition-related costs and fees and supporting affidavits pursuant to Special Master's November 18 Order; email to T. Gates regarding his draft affidavit; email to clients transmitting draft submission for their review and comments.	6.4	2,816.00
40120477	12/07/22	Wiygul, Robert	Fulton County: Review Dominion's application for an award of costs and fees; email to clients regarding same.	0.5	220.00
	12/07/22	Kotula, Kathleen	Review draft application for award of deposition fees and costs	0.2	60.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review and update exhibits 1 and 2 to R. Wiygul Affidavit in support of application for deposition-related fees.	0.1	15.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review correspondence from Court regarding deadline to respond to Dominion Application for Fees and update matter calendar regarding same.	0.1	15.00
40120477	12/08/22	Hunter, Maria	Fulton County: Prepare redacted version to Exhibit 3 to R. Wiygul Affidavit in support of application for fees.	0.5	75.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review and cite check R. Wiygul Affidavit in Support of Application for Fees.	0.7	105.00
40120477	12/08/22	Hunter, Maria	Fulton County: Review, update, finalize and file Application for Fees.	1.8	270.00
40120477	12/08/22	Wiygul, Robert	Fulton County: Review correspondence from Pa. Supreme Court regarding response to Dominion's application for fees and email clients regarding same.	0.2	88.00
40120477	12/08/22	Wiygul, Robert	Fulton County: Communications with M. Hunter regarding redactions to invoices to be submitted in support of request for deposition-related fees and finalization of exhibits to fee request; emails to clients regarding fee request; revise and finalize fee requests and supporting exhibits.	1.1	484.00
40120477	12/15/22	Kagedan, Eitan	Fulton County: Research standards and requirements for fee petitions in preparation for drafting petition to recover all appeal-related fees and costs in accordance with Special Master's Recommendation.	2.0	600.00
40120477	12/15/22	Wiygul, Robert	Weekly conference call with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.2	88.00
40120477	12/19/22	Kagedan, Eitan	Fulton County: Check in regarding Dominion application for fees and prepare no answer letter.	0.3	90.00
40120477	12/20/22	Wiygul, Robert	Fulton County: Revise no-answer letter in response to Dominion's application for fees and email clients regarding same.	0.2	88.00
40120477	12/21/22	Wiygul, Robert	Fulton County: Communications with clients regarding response to Dominion's application for fees and finalize and file same.	0.2	88.00
40120477	12/21/22	Wiygul, Robert	Fulton County: Email clients regarding Petitioners' response to Dominion's application for costs and fees.	0.1	44.00
40120477	12/22/22	Wiygul, Robert	Weekly conference with clients, OAG, and SUDC regarding status of Fulton County case and related matters; review federal court docket to determine status of Fulton County v. Dominion case.	0.2	88.00
40120477	12/29/22	Wiygul, Robert	Fulton County: Review order awarding the Secretary her deposition-related fees and costs; email clients regarding same.	0.2	88.00
	12/29/22	Kotula, Kathleen	Review court order awarding deposition fees and costs	0.1	30.00
40121133	01/05/23	Wiygul, Robert	Attend weekly conference call with clients, OAG, and SUDC regarding the status of the Fulton County case and related cases.	0.1	44.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40121133	01/30/23	Wiygul, Robert	Review check and cover letter received from Petitioners' counsel regarding award of deposition-related costs and fees; emails with clients regarding same; draft letter to K. Kotula enclosing check.	0.5	220.00
40123061	04/19/23	Kagedan, Eitan	Fulton County: Conduct comprehensive review and analysis of Pa. Supreme Court opinions resolving Secretary's appeal and application for sanctions; identify outstanding issues for	3.6	1,080.00
40123061	04/19/23	Wiygul, Robert	Fulton County: Review Supreme Court opinions awarding sanctions and resolving appeal; communications with team, clients, and counsel for Dominion regarding same.	1.5	660.00
	04/19/23	Boyer, Jacob	Review SCOPA opinion	1.0	300.00
	04/19/23	Kotula, Kathleen	Review SCOPA opinion	1.5	450.00
	04/19/23	Mullen, Kathleen	Review and analyze SCOPA opinion	1.5	450.00
40123061	04/20/23	Kagedan, Eitan	Fulton County: Review correspondence concerning outstanding issues raised by SCOPA Opinion.	0.1	30.00
40123061	04/21/23	Kagedan, Eitan	Fulton County: Assemble invoices for fee petition.	0.3	90.00
40123061	04/25/23	Kagedan, Eitan	Fulton County: Review correspondence from court.	0.1	30.00
40123061	04/27/23	Wiygul, Robert	Attend weekly conference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.2	88.00
40123061	04/28/23	Kagedan, Eitan	Fulton County: Develop strategy for drafting fee petition, including review of prior filings and consideration of including Commonwealth attorney time expenditures.	0.7	210.00
40123061	04/28/23	Hunter, Maria	Review of Order regarding Motions for Fees and Costs and update matter calendar regarding same.	0.1	15.00
40123061	04/28/23	Wiygul, Robert	Fulton County: Review Special Master's Order setting deadlines for fee submission and status report regarding expert report; telephone conference with E. Kagedan regarding next steps; email to clients regarding same.	0.4	176.00
	04/28/23	Kotula, Kathleen	Review special master's scheduling order	0.1	30.00
	05/22/23	Kotula, Kathleen	Calculate time in Fulton County matter	2.0	600.00
Totals				568.0	\$ 192,106.00

Exhibit H - Expenditures of Legal-Professional Time
[Sanctions Proceedings]

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
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Time Keeper	Hours	Amount
Wiygul, Robert	199.00	\$ 87,560.00
Mavroudis, Dimitri	27.40	\$ 12,056.00
Fischer, Michael	7.50	\$ 3,300.00
Kotula, Kathleen	14.30	\$ 4,290.00
Mullen, Kathleen	7.50	\$ 2,250.00
Boyer, Jacob	13.00	\$ 3,900.00
Kagedan, Eitan	207.50	\$ 62,250.00
Hill, John	4.00	\$ 1,000.00
Mascioli, Gianni	23.30	\$ 5,825.00
Arteaga, Alexandra	7.20	\$ 1,080.00
Hunter, Maria	57.30	\$ 8,595.00

EXHIBIT I

Exhibit I - Itemization and Description of Litigation Costs

Date/Period	Description	Detail	Item Amount	Backup Exhibit No.
12/15 - 12/16/21	Legal Research	Research possible avenues to forestall proposed Envoy Sage inspection, including potential for injunctive relief to prevent spoliation of evidence, in support of Emergency Application for an Order Prohibiting Spoliation of Key Evidence Scheduled to Occur on December 22, 2021.	\$ 601.34	Exhibit I_001
12/17-12/20/21	Legal Research	Research procedural avenues to prevent proposed Envoy Sage inspection, including whether the denial of an order seeking preservation of evidence is subject to immediate appeal.	\$ 558.14	Exhibit I_001
12/15-12/23/2021	Outside Professional Services - Expert	Expert review of proposed Envoy Sage inspection; advise counsel with respect to application to enjoin inspection; review and revise draft affidavit in support of application to enjoin inspect; review Envoy Sage and Steven Lahr expert declarations and reports; assessment of Envoy Sage's and Mr. Lahr's qualifications to perform inspection, and consult with counsel regarding the attendant risk of spoliation (11.5 hours x \$250/hr).	\$ 2,875.00	Exhibit I_002 Macias Ex. 2
12/28-12/31/2021	Outside Professional Services - Expert	Expert review and analysis of draft protocols for proposed Envoy Sage inspection (5.5 hours x \$250/hr).	\$ 1,375.00	Exhibit I_002 Macias Ex. 2
1/5/2022; 1/7/2022	Legal Research	Research regarding potential interlocutory appeal of adverse order on Dominion motion to intervene	\$ 105.84	Exhibit I_003
01/06/22	Legal Research	Research regarding impact of Sunshine Act on court's ability to enjoin public meeting.	\$ 142.99	Exhibit I_003
01/10/22	Legal Research	Research issues related to viability and procedural requirements for permissive interlocutory appeal.	\$ 252.29	Exhibit I_003
01/13/22	Legal Research	Research in support of draft Petition for Writ of Mandamus or Extraordinary Jurisdiction in anticipation of Commonwealth Court's not issuing an order prior to inspection.	\$ 957.53	Exhibit I_003
1/16-1/17/2022	Legal Research	Research in support of application for review, including research regarding appealability of Commonwealth Order denying motion for preservation order, standards for collateral orders, denials of injunctions, and permissive interlocutory appeals.	\$ 1,686.97	Exhibit I_003
1/18-1/19/2022	Legal Research	Research in support of Reply in Support of Emergency Application for Stay	\$ 323.14	Exhibit I_003
01/18/22	Filing Fees - Appeal Filing Fee	Filing of appeal in <i>County of Fulton et al. v. Secretary of the Commonwealth</i> , No. 3 MAP 2022	\$ 90.25	Exhibit I_004
01/14/22	Miscellaneous Expenses - Video of inspection	Fees for videographer for proposed Envoy Sage Inspection at Fulton County scheduled for 1/14/22	\$ 367.50	Exhibit I_005
1/13-1/15/2022	Outside Professional Services - Expert	Expert travel time to/from proposed Envoy Sage Inspection at Fulton County scheduled for 1/14/22 (13.5 hours x \$175/hr)	\$ 2,362.50	Exhibit I_006 Macias Ex. 3
1/13-1/15/2022	Outside Professional Services - Expert	Reimbursable travel expenses related to expert travel to/from proposed Envoy Sage Inspection at Fulton County scheduled for 1/14/22 - 1/13/22-1/14/22 Air travel TX to DC (\$291.60) - 1/13/22-1/14/22 Hotel stay (DC) (\$181.66) - 1/14/22 cab travel from airport to hotel (\$20.70) - 1/14/22 Lyft travel from hotel to car rental (\$14.64) - 1/14/22 Enterprise car rental for trip to/from Fulton County (\$88.53) - 1/14/22 Fuel (\$20.84) - 1/14/22-1/15/22 Hotel Stay (DC) (\$135.96) - 1/15/22 Air travel DC to TX (291.60) - 1/15/22 Lyft travel from airport to apartment (TX) (\$36.53)	\$ 1,082.06	Exhibit I_007 - Exhibit I_018
1/4-1/11/2022	Outside Professional Services - Expert	Expert review, analysis, comment, and revision of draft inspection protocols and scope of inspection documentation for the proposed Envoy Sage inspection of Fulton County's electronic voting machines (16.5 hours x \$250/hr).	\$ 4,125.00	Exhibit I_006 Macias Ex. 3
1/13-1/16/2022	Outside Professional Services - Expert	Consult concerning the ramifications and possibilities for mitigating the risks of the proposed Envoy Sage inspection of Fulton County's electronic voting machines (8 hours x \$250/hr).	\$ 2,000.00	Exhibit I_006 Macias Ex. 3
1/19-1/30/2022	Outside Professional Services - Expert	Expert review and comment on the Secretary's SCOPA filings (1 hour x \$250/hour).	\$ 250.00	Exhibit I_006 Macias Ex. 3
1/13 - 1/14/22	Travel Hotel - R. Wiygul (Inspection)	Hotel in Mercersburg for R. Wiygul's attendance at proposed Envoy Sage Inspection at Fulton County scheduled for 1/14/22 and potential emergency morning hearing via phone or videoconference on 1/14/22 regarding Secretary's motions to enjoin inspection (includes charge for late checkout due to need to draft emergency appeal to Pa. Supreme Court and application for injunction pending appeal following 10:00 a.m. on 1/14 ruling by Commonwealth Court)	\$ 286.60	Exhibit I_019 - Exhibit I_020
1/13 - 1/14/22	Travel Auto - R. Wiygul (Mileage + Tolls)	R.Wiygul Travel in personal vehicle to/from Mercersburg for attendance at proposed Envoy Sage Inspection at Fulton County scheduled for 1/14/22	\$ 236.76	Exhibit I_021 - Exhibit I_022
01/14/22	Travel Auto - K. Ferrari (Mileage)	K. Ferrari Travel in personal vehicle to/from Mercersburg for attendance at proposed Envoy Sage Inspection at Fulton County scheduled for 1/14/22	\$ 201.23	Exhibit I_023 - Exhibit I_025
02/16/22	Legal Research	Review case law in support of Appellant's Opening Brief	\$ 74.30	Exhibit I_026

Exhibit I - Itemization and Description of Litigation Costs

03/09/22	Legal Research	Research issues raised in Petitioners' appellate response brief and in Dominion's appellate brief.	\$ 111.89	Exhibit I_027
03/11/22	Legal Research	Research issues related to prerogative jurisdiction in support of Appellant's Reply Brief.	\$ 347.54	Exhibit I_027
03/14/22	Legal Research	Research issues related to permissive interlocutory appeal prerogative jurisdiction in support of Appellant's Reply Brief.	\$ 295.06	Exhibit I_027
3/17-3/18/2022	Legal Research	Research in support of drafting SCOPA reply brief.	\$ 278.85	Exhibit I_027
03/10/22	Meals	R. Wiygul meals in Harrisburg (hearing on Application for Contempt)	\$ 39.11	Exhibit I_028 - Exhibit I_029
6/9-6/14/2022	Legal Research	Research in support of Supplemental Brief on Appellate Jurisdiction.	\$ 835.92	Exhibit I_030
09/02/22	Legal Research	Research issues related to forfeiture of argument on appeal in preparation for oral argument.	\$ 125.93	Exhibit I_031
09/21/22	Legal Research	Research regarding potential additional case law to cite at oral argument regarding administrative agency's ability to secure prospective injunctive relief.	\$ 86.00	Exhibit I_031
9/29 - 9/30/22	Legal Research	Research in support of Application for an Order Holding Petitioners in Contempt and Imposing Sanctions	\$ 371.52	Exhibit I_031
9/23 - 9/24/22	Outside Professional Services - Expert	Expert review of and analysis concerning the allegations made in Fulton County's September 20, 2022 complaint against Dominion Voting Systems, Inc., No. 232-2022 (C.P. Fulton Cnty. Setp. 21, 2022) and the report of "Speckin Forensics, LLC" attached thereto (3.5 hours x \$250/hour).	\$ 875.00	Exhibit I_032 Macias Ex. 4
10/4/22; 10/19/22	Legal Research	Identify additional case law on an agency's entitlement to prospective injunctive relief for citation at Supreme Court oral argument.	\$ 308.88	Exhibit I_033
10/6/ - 10/9/22	Legal Research	Research in support of Application for Sanctions.	\$ 948.46	Exhibit I_033
10/24 - 10/26/22	Legal Research	Research in support of Memorandum of Law on Nature of Contempt	\$ 1,593.10	Exhibit I_033
10/24 - 10/27/22	Legal Research	Research concerning limits to scope of contempt proceedings and procedural requirements in preparation for status conference before Special Master.	\$ 116.60	Exhibit I_033
10/28/22	Legal Research	Research concerning potential privilege issues that Petitioners might raise.	\$ 147.20	Exhibit I_033
10/29 - 10/30/22	Legal Research	Research concerning privilege issues raised by Petitioners.	\$ 508.22	Exhibit I_034
10/31/22	Legal Research	Research in support of Motion to Compel Discovery.	\$ 43.00	Exhibit I_033
10/17/22	Outside Professional Services - Expert	Expert's time reviewing, revising, and supplementing, expert affidavit in support of the Secretary's Application for an Order Holding Appellees in Contempt and Imposing Sanctions ("Application for Contempt") (4.5 hours x \$250/hour) and reviewing and commenting on Application for Contempt.	\$ 1,125.00	Exhibit I_035 Macias Ex. 5
10/22 - 10/31/22	Outside Professional Services - Expert	Expert time reviewing and commenting on Petitioners' filings in response to the Secretary's Application for Contempt (2 hours x \$250/hour).	\$ 500.00	Exhibit I_035 Macias Ex. 5
11/04/22	Duplicating	Copies of Application for Discovery Sanctions and Discovery Responses for counsel use at Remote Status Conference	\$ 270.60	Exhibit I_036
11/04/22	Legal Research	Research in support of Motion for Discovery Sanctions	\$ 216.00	Exhibit I_037
11/08/22	Legal Research	Research in support of Supplemental Motion for Discovery Sanctions	\$ 92.88	Exhibit I_037
11/8 - 11/9/22	Legal Research	Research issues raised by Petitioners' Motion to Suspend Proceedings.	\$ 364.64	Exhibit I_037
11/10/22	Legal Research	Research concerning issues raised in Contempt hearings, including implications of the invocation of Fifth Amendment rights in civil context.	\$ 321.64	Exhibit I_037
11/11/22	Legal Research	Research concerning issues raised in Contempt hearings, including implications of ultra vires acts by members of the Board of Elections	\$ 650.16	Exhibit I_038
11/11/22	Legal Research	Research issues implicated by Fifth Amendment in support of post-hearing submission.	\$ 139.97	Exhibit I_038
11/12/22	Legal Research	Research implication of voting machine inspection having been conducted without a vote of the Board of Elections in support of post-hearing submission.	\$ 136.08	Exhibit I_038
11/13/22	Legal Research	Research unclean hands doctrine in support of post-hearing submission.	\$ 125.93	Exhibit I_038
11/14 - 11/16/22	Legal Research	Research in support of drafting post-hearing submission.	\$ 1,119.96	Exhibit I_038
11/15 - 11/18/22	Legal Research	Research in support of motion to admit key access log and regarding Defendants' objections thereto	\$ 565.27	Exhibit I_038 - Exhibit I_039
11/19/22	Legal Research	Review case law cited in Special Master's Report and Recommendation.	\$ 33.05	Exhibit I_039
11/5 - 11/10/22	Outside Professional Services - Expert	Expert's review of affidavit and supporting materials and conferences with counsel in preparation for testimony at evidentiary hearing on the Secretary's Application for Contempt (5 hours x \$250/hour)	\$ 1,250.00	Exhibit I_040 Macias Ex. 6
11/9 - 11/10/22	Outside Professional Services - Expert	Expert travel time to attend evidentiary hearing on the Secretary's Application for Contempt (4 hours x \$175/hr).	\$ 700.00	Exhibit I_040 Macias Ex. 6

Exhibit I - Itemization and Description of Litigation Costs

11/9 - 11/10/22	Outside Professional Services - Expert	Provide expert testimony at evidentiary hearing on the Secretary's Application for Contempt, including time spent at courthouse waiting to testify (14.5 hours x \$350/hour).	\$ 5,075.00	Exhibit I_040 Macias Ex. 6
11/9 - 11/10/22	Outside Professional Services - Expert	Expert's reimbursable travel expenses for travel to attend evidentiary hearing on the Secretary's Application for Contempt. - 11/6/22 meal in Harrisburg (\$11.32) - 11/9/22 Lyft travel Va to courthouse, HBG (\$180.99) - 11/9/22 Lyft travel from courthouse to hotel (\$14.99) - 11/9/22 Lyft travel for meeting with counsel (\$15.99) - 11/9/22 Lyft travel to hotel (\$14.71) - 11/9/22 hotel stay (\$127.69) - 11/10/22 Lyft travel from hotel to courthouse (\$14.99) - 11/10/22 Lyft travel from courthouse to VA (\$221.23)	\$ 601.91	Exhibit I_041 - Exhibit I_049 Macias Ex. 6
11/18 - 11/19/22	Outside Professional Services - Expert	Expert review of Special Master's Report and Recommendation (2 hours x \$250/hr).	\$ 500.00	Exhibit I_040 Macias Ex. 6
11/11/22	Transcript of Testimony	Transcript of Testimony - 11/4/22 Hearing	\$ 504.00	Exhibit I_050
11/17/22	Transcript of Testimony	Transcript of Testimony - 11/9/22 Hearing	\$ 5,635.75	Exhibit I_051
11/17/22	Transcript of Testimony	Transcript of Testimony - 11/10/22 Hearing	\$ 5,638.00	Exhibit I_052
11/17/22	Transcript of Testimony	Transcript of Testimony - 11/14/22 Hearing	\$ 2,038.05	Exhibit I_053
11/09/22	Travel Auto/Cab Fare	M. Hunter travel - hotel to courthouse in Harrisburg (hearing on Application for Contempt)	\$ 12.37	Exhibit I_054
11/8 - 11/10/22	Travel Auto/Cab Fare	M. Hunter travel to/from Harrisburg to attend hearing on Application for Contempt; Parking at hotel in Harrisburg	\$ 131.25	Exhibit I_055
11/8 - 11/10/22	Travel Auto/Cab Fare	R. Wiygul travel to/from Harrisburg to attend hearing on Application for Contempt; Parking at hotel in Harrisburg	\$ 153.75	Exhibit I_056 - Exhibit I_057
11/8 - 11/10/22	Travel Hotel	E. Kagedan hotel in Harrisburg (hearing on Application for Contempt) (includes charges for 1 meal)	\$ 580.56	Exhibit I_058
11/8 - 11/10/22	Travel Hotel	M. Hunter hotel in Harrisburg (hearing on Application for Contempt) (includes charges for parking and 1 meal)	\$ 596.88	Exhibit I_059
11/8 - 11/10/22	Travel Hotel	R. Wiygul hotel in Harrisburg (hearing on Application for Contempt) (includes charges for parking and 2 meals)	\$ 678.21	Exhibit I_060 - Exhibit I_061
11/14/22	Travel Auto/Cab Fare	E. Kagedan travel - home to courthouse in Philadelphia (continued hearing on Application for Contempt)	\$ 8.89	Exhibit I_062
11/03/22	Outside Duplicating	Preparation of 2 binders of Secretary's potential hearing exhibits for counsel review in preparation for finalization of potential hearing exhibits and preparation of final binders (4,428 pages)	\$ 653.46	Exhibit I_063
11/08/22	Outside Duplicating	Preparation of 1 loose copy and 7 binders of Secretary's hearing exhibits: 19,760 b/w pages, 784 color pages of exhibits for use of Secretary's counsel and paralegal, opposing counsel, witnesses, court reporter and Court	\$ 3,481.00	Exhibit I_064
11/08/22	Meals	M. Hunter - snacks (hearing on Application for Contempt)	\$ 22.46	Exhibit I_065
11/9 - 11/10/22	Meals	M. Hunter meals in Harrisburg (hearing on Application for Contempt)	\$ 23.73	Exhibit I_066
11/8 - 11/10, 10/14/22	Meals	R. Wiygul team meals in Harrisburg (hearing on Application for Contempt)	\$ 178.73	Exhibit I_067 - Exhibit I_069
11/08/22	Meals	E. Kagedan & R. Wiygul meal in Harrisburg (hearing on Application for Contempt)	\$ 37.80	Exhibit I_070
12/22/22	Legal Research [PACER]	Review federal court docket to determine status of Fulton County case against Dominion	\$ 3.60	Exhibit I_071
12/06/22	Legal Research	Research standards and requirements for fee petitions in support of Application for Fees and Costs.	\$ 543.67	Exhibit I_072
12/15/22	Legal Research	Research standards and requirements for fee petitions in support of Application for Fees and Costs.	\$ 153.36	Exhibit I_072
02/01/23	Messenger/Delivery Service - Federal Express	Delivery to Department of State of check in the amount of \$14,039.48 received from Petitioners' counsel for payment of deposition-related fees awarded as sanctions in Special Master's 12/29/22 Order.	\$ 28.65	Exhibit I_073

Total	\$ 61,878.98
Fees incurred up to and through April 12, 2022	\$ 21,026.89
Fees incurred after April 12, 2022	\$ 40,852.09

Exhibit I - Itemization and Description of Litigation Costs

Duplicating	\$ 270.60
Legal Research	\$ 15,286.92
Filing Fees	\$ 90.25
Miscellaneous Expenses (video of inspection)	\$ 367.50
Outside Professional Services	\$ 24,696.47
Transcript of Testimony	\$ 13,815.80
Travel Auto/Cab Fare	\$ 1,030.85
Travel Hotel	\$ 1,855.65
Outside Duplicating	\$ 4,134.46
Messenger/Delivery Service	\$ 28.65
Meals	\$ 301.83

INVOICE

To: Michele D. Hangley and Robert A. Wiygul
mdh@hangley.com / raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2021_December
DATE: December 31, 2021

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
20	Hours	Hours worked on Pennsylvania Election Reviews	\$250	\$5,000.00

Total \$5,000.00

Account by Client by User by Day

Account: [REDACTED]
Client: 28600-450
User Name: PERRIN/ALUMBERT, Y (614553)

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HANGLEY ARONCHICK SEGAL PUDLIN
& SCHILLER
OPERATING ACCOUNT
ONE LOGAN SQUARE 27TH FLOOR
PHILADELPHIA, PA 19103

1432

3-5/310
700

DATE January 18, 2022


PAY
TO THE
ORDER OF

PA Supreme Court

\$ 90.25

Ninety

25
100

DOLLARS 

 **PNCBANK**

PNC Bank, N.A. 020

FOR _____

Ant. Walker MP

⑈001432⑈ ⑆031000053⑆ [REDACTED]

78000-050

Appeal Filing fee

SCAN

OTM Legal
1195 Fairmont Drive
Harrisburg, PA 17112

Invoice

Date 1/14/2022
Invoice # 2346

Bill To

Hangley Aronchick Segal Pudlin
Attn: Kimberly T. Ferrari
One Logan Square
27th Floor
Philadelphia, PA 19103

Ship To

Hangley Aronchick Segal Pudlin
Attn: Kimberly T. Ferrari
One Logan Square
27th Floor
Philadelphia, PA 19103

P.O. #
Terms C.O.D.

Ship Date 1/14/2022
Due Date 1/14/2022
Other

Item	Description	Qty	Price	Amount
	File Uploaded 1/14/22			
	Inspection Fulton County [IWVOV-HASP1.FID141330] Date: 1/14/22 Location: McConnellsburg, PA Duration: 12:30P-1:45P			
Video Depositi...	Video Deposition First Hour		225.00	225.00
Video Depositio...	Video Deposition Hourly	0.25	110.00	27.50
Miles Outside ...	Travel		115.00	115.00

Make Check Payable To: OTM Legal

otmlegal@gmail.com

717-975-9217

Subtotal	\$367.50
Sales Tax (0.0%)	\$0.00
Total	\$367.50
Payments/Credits	\$0.00
Balance Due	\$367.50

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2022_January
DATE: February 1, 2022

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
25.5	Hours	Hours worked on Pennsylvania Election Reviews	\$250	\$6,375.00
13.5	Hours	Hours traveling for Pennsylvania Election Review	\$175	\$2,362.50
1	Each	Reimbursable Travel Cost (See Attached)	\$1,277.50	\$1,277.56

Total \$10,015.06

PASSENGER TICKET AND BAGGAGE CHECK

SUBJECT TO CONDITIONS OF CONTRACT

2324629566

4 AMERICAN AIRLINES

2

*** ELECTRONIC TICKET ***

PASSENGER RECEIPT 10F 1

AMERICAN AIRLINES

DATE OF ISSUE
13 JAN 22 45105104

US

ISS. AGENCY
DFW KDJPLACE OF ISSUE
/DALLAS FT WORTH

MACIAS/RYAN

MACIAS/RYAN

NOT VALID FOR***RETAIN THIS RECEIPT**

TRANSPORTATIONTHROUGHOUT YOUR JOURNEY*

DALLAS FT WORTH

AL 1365 L 13 JAN LOAIZNM

USD257.67 NONREFUNDABLE NONREF/FAREDIF/CXL BY FLT T

WASHINGTON REAGAN

IME OR NO

PNR CODE
RGGBC/AA

CONF. TKT. NO

0012321721455/01 JAN 22XTM

ISSUED IN EXCHANGE FOR

0012321721455

DFW AA HAS257.67LOAIZNM USD257.67END ZPDW XT5.60AY4.50XFDW4.5

FP IXXXXXXXXXXXX9429

A/C BAXXXXXXXXXXXXX9429/XXXX*090631

193.00EFV

USD 257.87

US 18.33

ZP 4.50

XT 10.10

USD 29.60

AVIATION CONTROLS

GROUP NO.

AIRLINE

FORM SERIAL NO

CI

00129417263013

001 2324629566 4

EXHIBIT A - 190


NOT VALID FOR TRAVEL

001 2324629566 4

Exhibit I_007

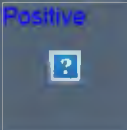
From: [Independent Cab Co. via Square](#)
To: [Ryan Macias](#)
Subject: Receipt from Independent Cab Co.
Date: Friday, January 14, 2022 2:25:49 AM

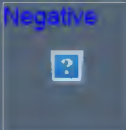
Square automatically sends receipts to the email address you used at any Square seller. [Learn more](#)



Independent Cab Co.

Let Independent Cab Co. know how your experience was

Positive

Negative

\$20.70

Custom Amount	\$18.00
Purchase Subtotal	\$18.00
Tip	\$2.70
Total	\$20.70

Independent Cab Co.

Visa 9429 (Swipe)

Jan 14 2022 at 2:25 AM



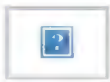
#xGJ5

RYAN MACIAS

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with VIDISHA on January 14
Date: Friday, January 14, 2022 10:26:11 AM

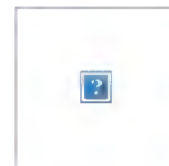
----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Fri, Jan 14, 2022, 10:24 AM
Subject: Your ride with VIDISHA on January 14
To: [REDACTED]



JANUARY 14, 2022 AT 10:13 AM

**Thanks for riding with
VIDISHA!**



100% of tips go to drivers. [Add a tip](#)



Lyft fare (2.04mi, 10m 10s)

\$12.64

Tip

\$2.00



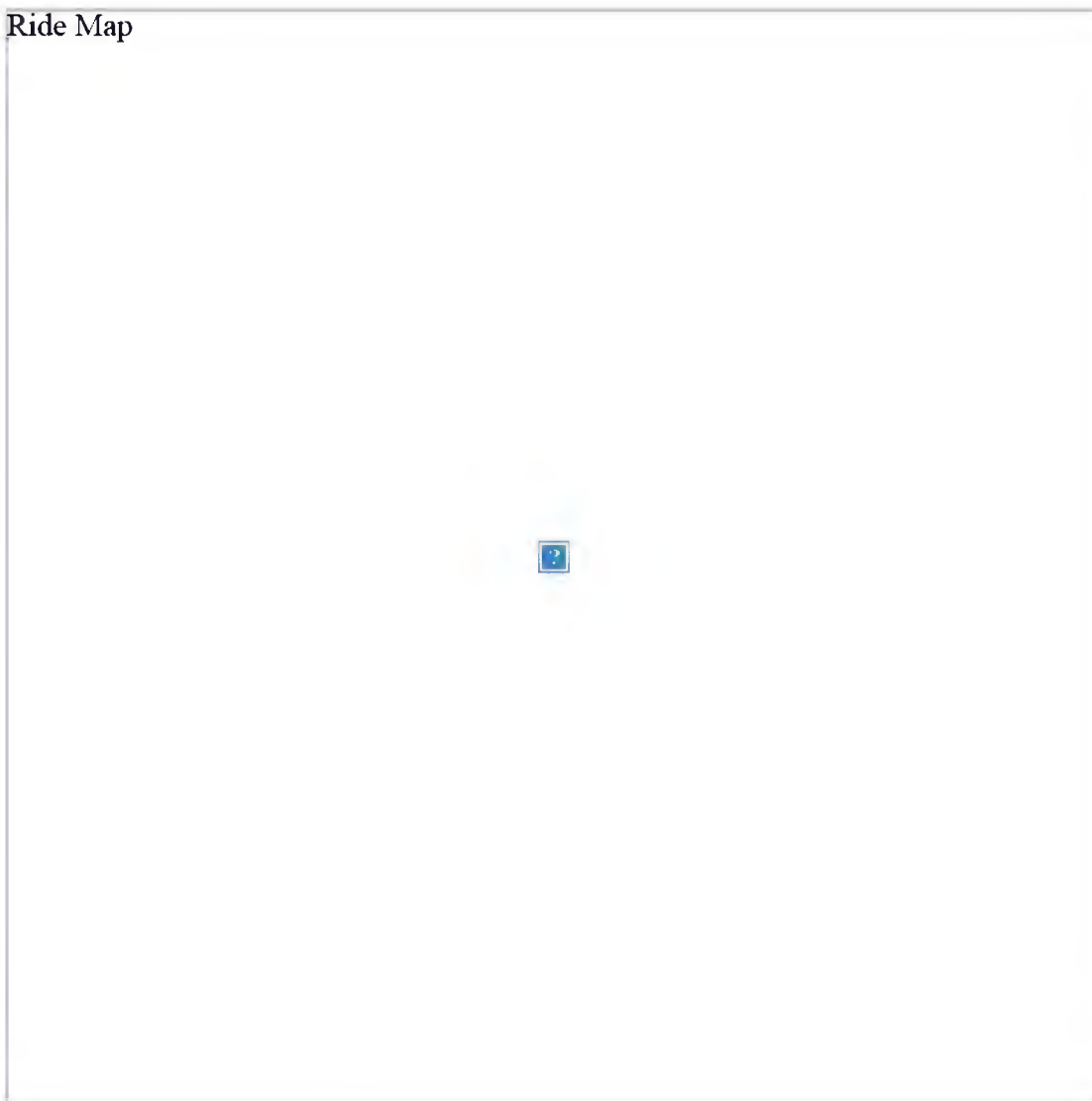
Visa *9429

\$14.64

We haven't charged you for this ride yet.

The charge for this ride will be combined with any other rides you take on January 14, 2022. You'll receive a receipt combining all of your day's charges, whenever you take more than one ride in a single day.

Ride Map

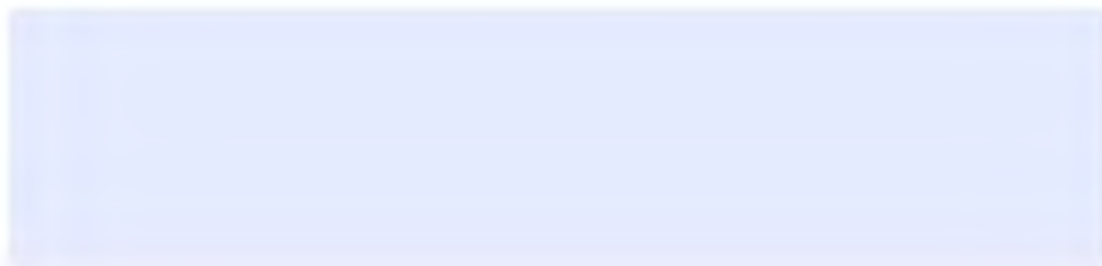


☐ **Pickup** 10:13 AM

2800 Potomac Ave, Arlington, VA

☐ **Drop-off** 10:23 AM

2655 Thomas Ave, Arlington, VA



1138 ROOM CK TYPE 35 ROOM CLERK	MACIAS/RYAN NAME [REDACTED] ADDRESS	159.00 RATE	01/14/22 DEPART 01/13/22 ARRIVE	12:10 TIME 23:05 TIME	ACCT# [REDACTED] MBV#: [REDACTED]
		VSXXXXXXXXXXXX9710 PAYMENT			
DATE	REFERENCES	CHARGES		CREDITS	BALANCES DUE
01/13	TR ROOM 1138, 1	159.00			
01/13	ROOM TAX 1138, 1	9.54			
01/13	OCC TAX 1138, 1	13.12			
01/14	CCARD-VS			181.66	
PAYMENT RECEIVED BY: VISA		XXXXXXXXXXXX9710			.00

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Your Marriott Bonvoy points/miles earned on your eligible earnings will be credited to your account. Check your Marriott Bonvoy Account Statement for updated activity. See members.marriott.com for new Marriott Bonvoy benefits.

Was that the best night's sleep you have ever had? Have a repeat performance at your place by visiting CollectRenaissance.com.

This statement is your only receipt. You have agreed to pay in cash or by approved personal check or to authorize us to charge your credit card for all amounts charged to you. The amounts shown in the credit column opposite any credit card entry in the reference column above will be charged to the credit card number set forth above. (The credit card company will bill in the usual manner.) If for any reason the credit card company does not make payment on this account, you will owe us such amount. If you are direct billed, in the event payment is not made within 25 days after check-out, you will owe us interest from the check-out date on any unpaid amount at the rate of 1.5% per month (ANNUAL RATE 18%), or the maximum allowed by law, plus the reasonable cost of collection, including attorney fees.



Rental Agreement # 769271400

Invoice # 90137130432

Renter Information

Renter Name

RYAN MACIAS

Renter Address

[REDACTED]
[REDACTED]

Contract

COSTCO US MAIN ERAC

Vehicle Information

22 TOYOTA COROLLA LE 4DR

SEDAN

License #: BWL637

State/Province: KY

Unit #: 8CJ010

Vehicle #: NP280671

Vehicle Class Driven

Midsize 2/4 door/Automatic/Air

Vehicle Class Charged

Economy 4 door/Automatic/Air

Odometer Mileage/Kilometers

Starting: 8,845 Ending: 9,057

Total: 212

Fuel

Starting: Full Ending: Full

**Thank you for renting
with Enterprise Rent-A-
Car**

We appreciate your business!

This email was automatically generated
from an unattended mailbox, so please
do not reply to this e-mail.

If you have any questions about your
rental, please view our Frequently

Trip Information

Pickup

Friday, January 14, 2022 10:26 AM

Return

Friday, January 14, 2022 5:44 PM

Start Charges

Friday, January 14, 2022 10:41 AM

DCA REAGAN ARPT (DCA) +

RONALD REAGAN WASH NATL

AIRPRT

2500 NATIONAL AVENUE GARAGE A

ARLINGTON, VA 22202-3601

USA

DCA REAGAN ARPT (DCA) +

RONALD REAGAN WASH NATL

AIRPRT

2500 NATIONAL AVENUE GARAGE A

ARLINGTON, VA 22202-3601

USA

Renter Charges

Rental Rate	Time & Distance 1 Day at \$33.99 / Day	\$33.99
Coverages	Slp (\$12.81 / Day)	\$12.81
	Cdw/ldw (\$23.99 / Day)	\$23.99
Add-Ons	Discount (2.00%)	(\$0.68)
Taxes and Fees	Va Additional Rental Tax (4.00%)	\$2.81
	Vehicle License Fee .10/day (\$0.10 / Day)	\$0.10
	Dca Contract Fee 3.50/day (\$3.50 / Day)	\$3.50
	Concession Recovery Fee 11.11 Pct (11.11%)	\$7.80
	Va Rental Fee (2.00%)	\$1.40
	Va Rental Tax (4.00%)	\$2.81

Total **\$88.53**

(Subject to audit)

Amount charged on January 14, 2022 to VISA (9429) (\$88.53)

Amount Due **\$0.00**

CRYSTAL CITY 2388 JEFFERSON DAVIS HWY
ARLINGTON, VA 22202
THANKS FOR YOUR BUSINESS

EXXON EXPRESS PAY

CRYSTAL CITY
FG51126166001
2300 JEFFERSON DAVIS
ARLINGTON , VA
22202
01/14/2022 90460655
05:33:23 PM

XXXXXXXXXXXXX9429

Visa

INVOICE 066711

AUTH 06893I

PUMP# 12

Regular 5.6346

PRICE/GAL \$3.699

FUEL TOTAL \$ 20.84

CREDIT \$ 20.84

Customer Activated Purchase/Loyalty

Site #: 801004082478627

Shift Number 1

Sequence Number 10913

Delivered

APPROVED 01/14/2022

THANKS FOR YOUR BUSINESS



MARRIOTT

CRYSTAL GATEWAY MARRIOTT

GUEST FOLIO

1554 ROOM	MACIAS/RYAN NAME	119.00 RATE	01/15/22 DEPART	09:26 TIME	ACCT#
NKG TYPE			01/14/22 ARRIVE	18:07 TIME	
21 ROOM CLERK	ADDRESS	VSXXXXXXXXXXXX9710 PAYMENT			MBV#: XXXXX4563

DATE	REFERENCES	CHARGES	CREDITS	BALANCES DUE
01/14	ROOM 1554, 1	119.00		
01/14	STATETAX 1554, 1	7.14	A	
01/14	OCC TAX 1554, 1	9.82	B	
01/15	CCARD-VS			135.96
	PAYMENT RECEIVED BY VISA XXXXXXXXXXXXXXX9710			
				.00
===== SUMMARY OF TAXES =====				
	DESCRIPTION		TAXED AMOUNT	TAX
M	AV TAX INCLUSIVE 6%		.00	.00
O	BANQ TAX 6%		.00	.00
	NET CHARGES	TAX	CREDITS	FOLIO
	135.96	.00	135.96	.00

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MARRIOTT

CRYSTAL GATEWAY MARRIOTT
1700 JEFFERSON DAVIS
ARLINGTON VA 22202
703 920 3230

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This statement is your only receipt. You have agreed to pay in cash or by approved personal check or to authorize us to charge your credit card for all amounts charged to you. The amounts shown in the credit column opposite any credit card entry in the reference column above will be charged to the credit card number set forth above. (The credit card company will bill in the usual manner.) If for any reason the credit card company does not make payment on this account, you will owe us such amount. If you are direct billed, in the event payment is not made within 25 days after check-out, you will owe us interest from the check-out date on any unpaid amount at the rate of 1.5% per month (ANNUAL RATE 18%), or the maximum allowed by law, plus the reasonable cost of collection, including attorney fees.

EXHIBIT A - 197

Exhibit I_014

Signature X

From: [American Airlines](#)
To: [Ryan Macias](#)
Subject: Your trip confirmation-WERQQU 15JAN
Date: Friday, January 14, 2022 7:36:37 PM



Hello Ryan Macias!

Issued: Jan 15, 2022



Your trip confirmation and receipt

Record locator: **WERQQU**

A face covering is required while flying on American, except for children under 2 years old. You are also required to wear a face covering while in the airport before and after your flight. [Read more about travel requirements.](#)

You'll need your record locator to find your trip at the kiosk and when you call Reservations.

[Manage Your Trip](#)

Saturday, January 15, 2022

DCA

9:13 AM

Washington Reagan

American Airlines 420



DFW

12:00 PM

Dallas/Fort Worth

Seats: [10D](#)

Class: Coach (L)

Meals: Refreshment

[Free entertainment with the American app »](#)

Ryan Macias

Earn miles with this trip.

[Join AAdvantage »](#)

Ticket # 0012324849273

Your trip receipt



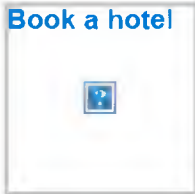
Exchange, Visa XXXXXXXXXXXXX9429

Ryan Macias

FARE-USD	\$ 257.67
TAXES AND CARRIER-IMPOSED FEES	\$ 33.93
TICKET TOTAL	\$ 291.60
ADDITIONAL FARE COLLECTION	\$ 193.00

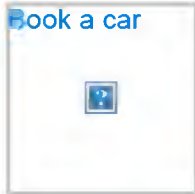
TICKET CHANGE	\$ 0.00
---------------	---------

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Get the American Airlines app

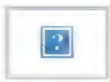


Additional Services are subject to credit card approval at time of ticketing. Additional Services may appear on multiple accompanied documents as a matter of reference.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with James on January 15
Date: Saturday, January 15, 2022 2:30:39 PM

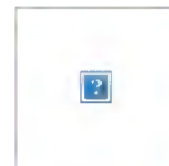
----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Sat, Jan 15, 2022, 2:15 PM
Subject: Your ride with James on January 15
To: [REDACTED]



JANUARY 15, 2022 AT 1:38 PM

Thanks for riding with James!



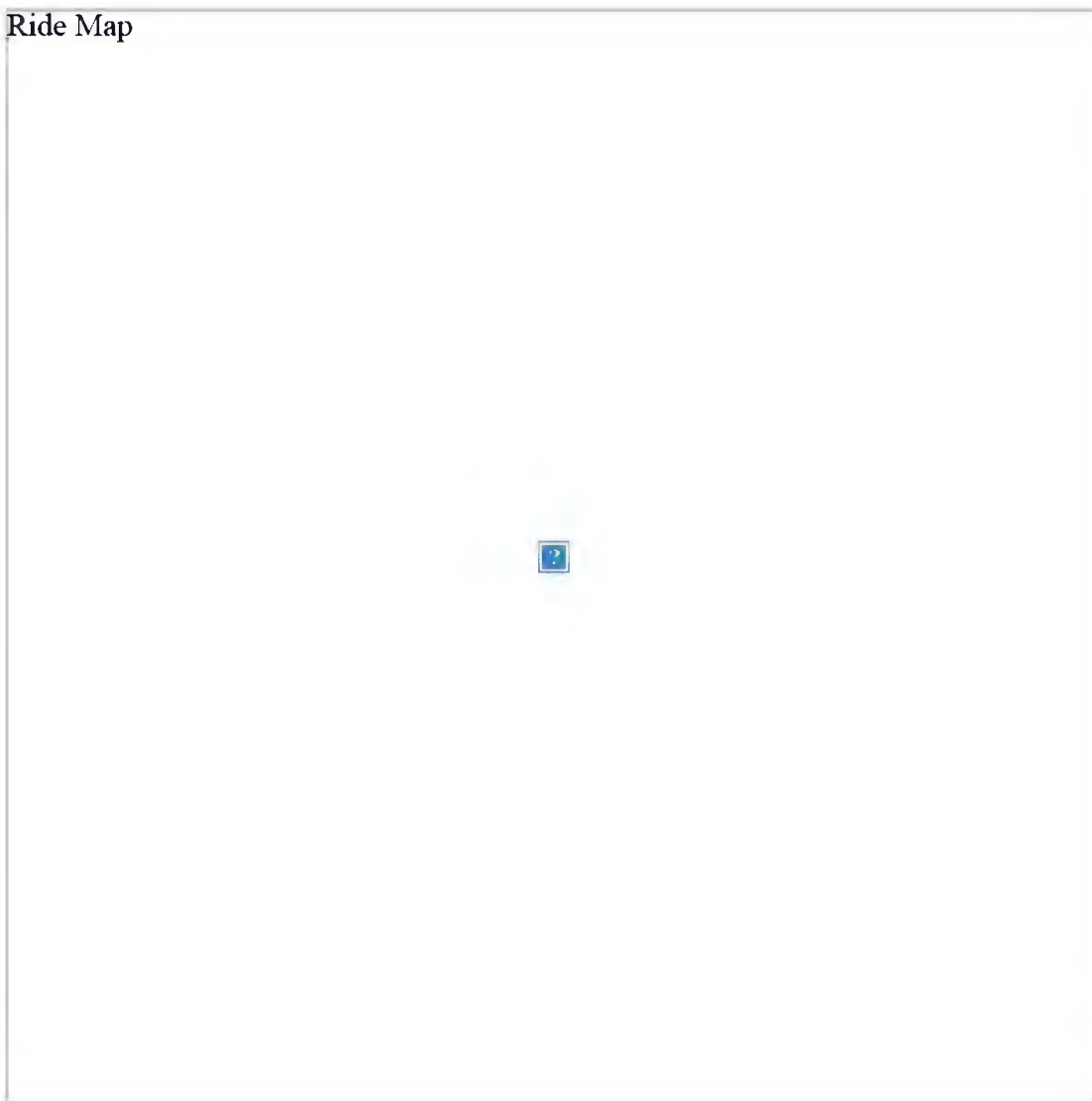
100% of tips go to drivers. [Add a tip](#)

Lyft fare (21.79mi, 27m 43s)	\$28.67
Texas Surcharge	\$0.90
Tip	\$6.96

Visa *9429	\$36.53
------------	----------------

We haven't charged you for this ride yet.
The charge for this ride will be combined with any other rides you take on January 15, 2022. You'll receive a receipt combining all of your day's charges, whenever you take more than one ride in a single day.

Ride Map

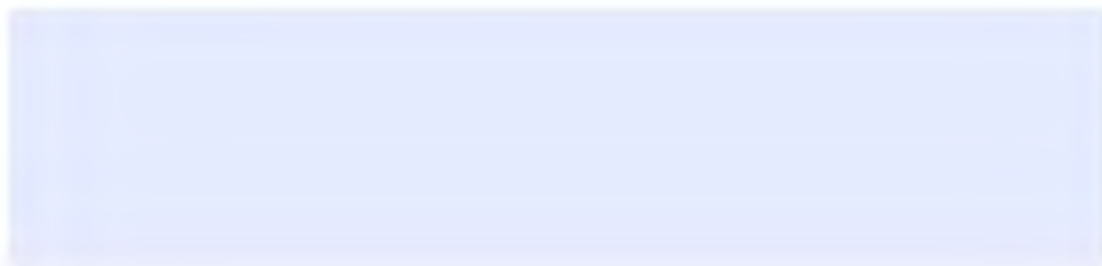


☐ **Pickup** 1:38 PM

Terminal C, 75261, Grapevine, TX, US

☐ **Drop-off** 2:06 PM

[REDACTED] Dallas, TX



Subject: FW: Receipts for reimbursement

----- Forwarded message -----

From: <innkeeper@mercersburginn.com>

Date: Fri, Jan 14, 2022, 2:31 PM

Subject: Thank you - your receipt from The Mercersburg Inn

To: [REDACTED]



Friday, January 14, 2022

Dear Robert Wiygul,

Please find your receipt below.

Name: Robert Wiygul

Confirmation ID: 7F7W8U78

Room: Vaughn's Room #16 (Thursday, January 13, 2022 - Friday, January 14, 2022) 2 adults

Last Minute Special

01/13/2022	Room	\$199.20	
01/14/2022	Late Check Out	\$59.00 *	*(due to emergency brief to be filed)

Payments

	Credit Card	
01/13/2022	Visa 4069	\$221.11
01/14/2022	Credit Card Visa 4069	\$65.49

Subtotal:	\$258.20
County Tax:	\$12.91
State Tax:	\$15.49
Total:	\$286.60
Amount Paid:	\$286.60

Remaining Balance:

\$0.00

Sincerely,

The Mercersburg Inn
405 South Main Street
Mercersburg, PA 17236
717 328 5231
innkeeper@mercersburginn.com
www.mercersburginn.com



The Mercersburg Inn

405 South Main Street

Mercersburg, PA 17236

717-328-5231

www.mercersburginn.com

HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER
CHECK REQUEST FORM

REQUESTED BY RAW

DATE REQUESTED 1-18-21

DATE NEEDED
(IF MORE OR LESS THAN 30-45 DAYS) _____

If this is a request for reimbursement, section 1 and section 2 must be completed. Attach all receipts.

SECTION 1:

PAYABLE TO RAW

AMOUNT \$523.36 CLIENT/MATTER NAME Commonwealth

CLIENT/MATTER NUMBER 28000-050

DESCRIPTION OF EXPENSE Travel to McConnellsburg, PA for Inspection

SPECIAL INSTRUCTIONS _____

--- --- --- --- --- --- --- --- --- --- --- --- --- --- ---

SECTION 2:

LOCATION/DESTINATION McConnellsburg, PA

PEOPLE IN ATTENDANCE RAW; KJT

BUSINESS DISCUSSED/PURPOSE OF TRAVEL Inspection

*\$208.26 (= \$0.585 x 356 miles) for round-trip travel between Philadelphia and McConnellsburg for inspection

DATE	TRAVEL FROM	TRAVEL TO	HOTEL	SEMINAR	MEALS	AIR/RAIL	AUTO/CAB	OTHER	TOTAL
1-14-22	PHL	McCon	\$286.60				\$236.76*		\$523.36
									\$0.00
									\$0.00
									\$0.00
TOTAL			\$286.60	\$0.00	\$0.00	\$0.00	\$236.76		\$523.36

APPROVED BY _____

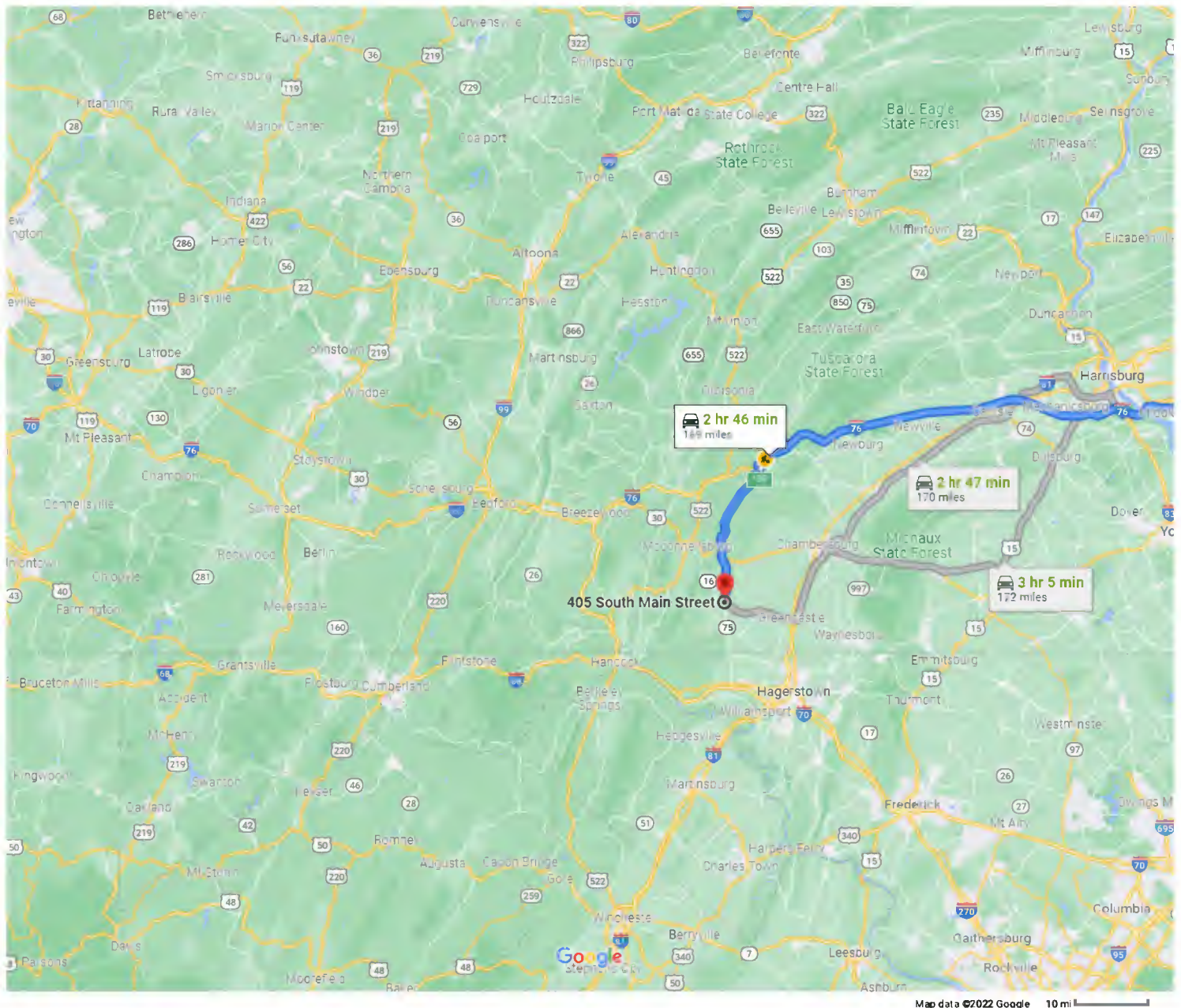
DATE _____





Number of Transponders

Transactions for the Last Week

Post Date	Exit Date Time	Transaction	Tag / License	Entry	Exit	Amount
01/16/2022		CC Replenish				\$50.00
01/16/2022	01/14/2022 18:39:17	E-ZPass Toll		Willow Hill	Valley Forge	(\$16.40)
01/16/2022	01/14/2022 00:48:44	E-ZPass Toll		Valley Forge	Carlisle	(\$12.10)

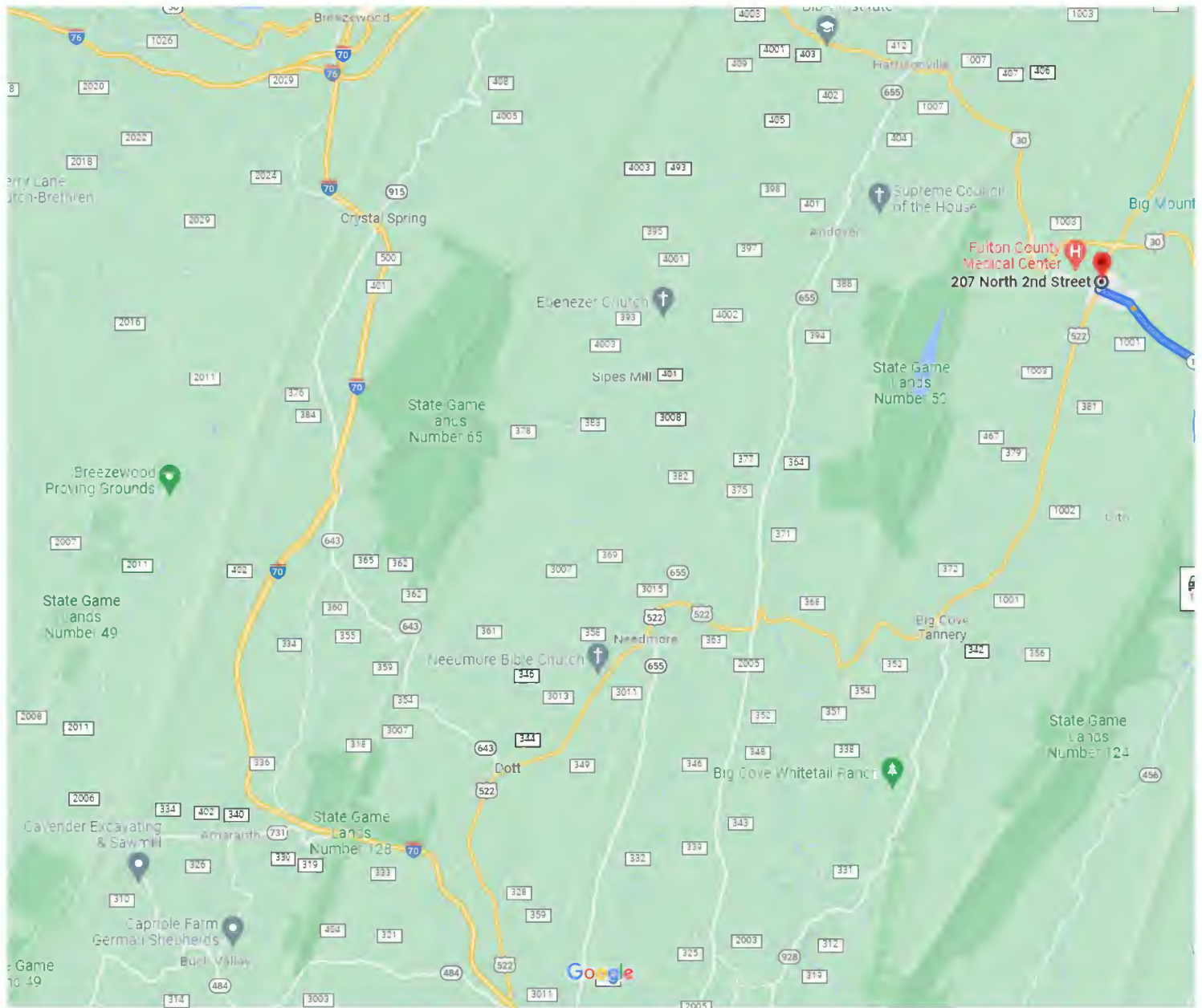





- 
via I-76 W **2 hr 46 min**
 Fastest route, the usual traffic 169 miles
 This route has tolls.
- 
via I-76 W and I-81 S **2 hr 47 min**
 170 miles
- 
via I-76 W and US-15 S **3 hr 5 min**
 172 miles

Explore 405 S Main St

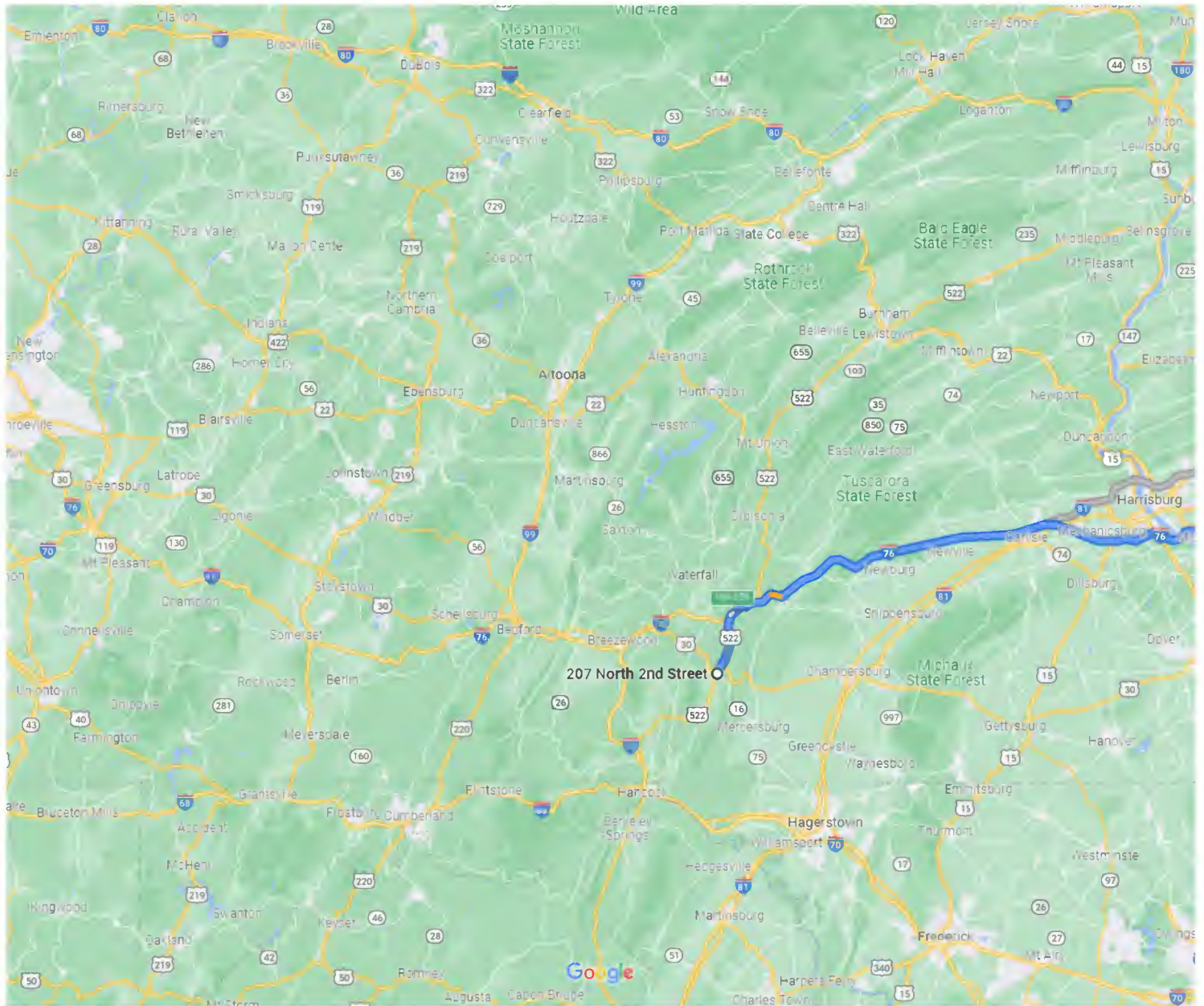
Restaurants Hotels Gas stations Parking Lots More





 via PA-16 W/Buchanan Trail W **19 min**
Fastest route, lighter traffic than usual 10.9 miles

Explore 207 N 2nd St

Restaurants Hotels Gas stations Parking Lots More



Map data ©2022 Google 10 mi

 **via I-76** **2 hr 33 min**
Fastest route, the usual traffic 165 miles
 This route has tolls.

 **via I-78 E** **3 hr 4 min**
189 miles

Explore [redacted]

Restaurants Hotels Gas stations Parking Lots More

Account by Client by User by Day

Account: [REDACTED]

Date Range: February 02, 2022 - February 10, 2022

Report Format: Summary-Account by Client by User by Day (Targeted)

Products: Westlaw, Westlaw Retired

Content Families: AI Content Families

1

Account: Client 280007-050

Client: ZOUROUSU
User Name: FERRARUKIMBERLY (6149583)

[illegible]

Account: HANGLEY ARONCHICK SEGAL & PUDUN, PHILADELPHIA PA
Date Range: March 09, 2022 - March 18, 2022
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account [REDACTED]								
Client 28000-050								
User Name KAGEDAN,LEITAN G (21058896)								
Day 03/09/2022								
Totals for included		9			518.00 USD	103.60 USD	8.29 USD	111.89 USD
Totals for Day 03/09/2022		9			518.00 USD	103.60 USD	8.29 USD	111.89 USD
Day 03/11/2022								
Totals for included		42			1,609.00 USD	321.80 USD	25.74 USD	347.54 USD
Totals for Day 03/11/2022		42			1,609.00 USD	321.80 USD	25.74 USD	347.54 USD
Day 03/14/2022								
Totals for included		20			1,366.00 USD	273.20 USD	21.86 USD	296.06 USD
Totals for Day 03/14/2022		20			1,366.00 USD	273.20 USD	21.86 USD	296.06 USD
Totals for User Name KAGEDAN,LEITAN G (21058896)		71			3,453.00 USD	698.60 USD	55.89 USD	754.49 USD
User Name WYNGUL,ROBERT A (9372048)								
[REDACTED]								
[REDACTED]								
Day 03/17/2022								
Totals for included		33			1,119.00 USD	223.80 USD	17.90 USD	241.70 USD
Totals for Day 03/17/2022		33			1,119.00 USD	223.80 USD	17.90 USD	241.70 USD
Day 03/18/2022								
Totals for included		10			172.00 USD	34.40 USD	2.75 USD	37.15 USD
Totals for Day 03/18/2022		10			172.00 USD	34.40 USD	2.75 USD	37.15 USD
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								

BUGI'S COCINA
1233 N 3RD ST
HARRISBURG, PA 17102
7176023768

10-Mar-2022 12:01:02P

Transaction 012802

1 Chicken On Stick Meal (2 Sticks)	\$12.99
1 Juice	\$1.50

Subtotal \$14.49

Sales Tax	6%	\$0.87
Card Fee	3.5%	\$0.51
Total Taxes		\$1.38

Total	\$15.87
Tip	\$2.86

DEBIT CARD SALE

\$18.73

10-Mar-2022 12:01:26P

\$18.73 | Method: EMV

US DEBIT XXXXXXXXXXXX5623

ROBERT A WIYGUL

Reference ID: 206900534000

Auth ID: 130518

MID: *****7881

AID: A0000000980840

AthNtwkNm: VISA

RtInd: CREDIT

Order 6SXTHX2XB8BEJ

Payment 8TTG91EEPTKJW

Clover Privacy Policy
<https://clover.com/privacy>

Zeroday Brewing Company
925 N 3rd Street
Harrisburg, PA 17102
(717) 745-6218

BAR 1

Tbl N/A Chk 050916 Gst 1
WIYGUL/ROBERT A
03/09/22 07:22PM

~~1 Critical Condition 6.50~~
1 Red Enchiladas 15.00

SUBTOTAL 21.50
TAX 0.90

TOTAL 22.40
TIP 4.48

26.88
08:04PM PAID 26.88

less beverage not reimbursable (6.50)

Adjusted total 20.38

VISA xxxx-xxxx-xxxx-4069
WIYGUL/ROBERT A

THANK YOU FOR VISITING

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA [REDACTED]
 Date Range: June 01, 2022 - June 30, 2022
 Report Format: Summary-Account by Client by User by Day (Targeted)
 Products: Westlaw, Westlaw Retired
 Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Amount of Discount	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]									
Client 28000-050									
User Name H LL,JOHN B (18690333)									
Day 06/14/2022									
Totals for Included		5			645.00 USD	516.00 USD	129.00 USD	10.32 USD	139.32 USD
Totals for Day 06/14/2022		5			645.00 USD	516.00 USD	129.00 USD	10.32 USD	139.32 USD
Totals for User Name HILL,JOHN B (18690333)		5			645.00 USD	516.00 USD	129.00 USD	10.32 USD	139.32 USD
User Name WIYGUL,ROBERT A (9372048)									
[REDACTED]									
[REDACTED]		1							
[REDACTED]		1							
Day 06/09/2022									
Totals for Included		7			215.00 USD	172.00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 06/09/2022		7			215.00 USD	172.00 USD	43.00 USD	3.44 USD	46.44 USD
Day 06/10/2022									
Totals for Included		33			2,795.00 USD	2,236.00 USD	559.00 USD	44.72 USD	603.72 USD
Totals for Day 06/10/2022		33			2,795.00 USD	2,236.00 USD	559.00 USD	44.72 USD	603.72 USD
Day 06/11/2022									
Totals for Included		3			215.00 USD	172.00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 06/11/2022		3			215.00 USD	172.00 USD	43.00 USD	3.44 USD	46.44 USD
[REDACTED]		1							
[REDACTED]		1							
[REDACTED]		1							
[REDACTED]		1							
[REDACTED]		1							
[REDACTED]		1							

Content Families: All Content Families

Total Charge

[illegible]

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2022_September
DATE: October 3, 2022

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
3.5	Hours	Hours worked on Pennsylvania Election Reviews	\$250	\$875.00

Total \$875.00

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA
Date Range: October 01, 2022 - October 31, 2022
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Line	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]								
Client: 28000-050								
User Name ARTEAGA,ALEXANDRA C (20360584)								
Day 10/26/2022								
Totals for Included		27			2,500.00 USD	516.00 USD	0.00 USD	516.00 USD
Totals for Day 10/26/2022		27			2,500.00 USD	516.00 USD	0.00 USD	516.00 USD
Totals for User Name ARTEAGA,ALEXANDRA C (20360584)		27			2,500.00 USD	516.00 USD	0.00 USD	516.00 USD
User Name KAGEDAN,EITAN G (21058896)								
Day 10/04/2022								
Totals for Included		17			1,215.00 USD	243.00 USD	19.44 USD	262.44 USD
Totals for Day 10/04/2022		17			1,215.00 USD	243.00 USD	19.44 USD	262.44 USD
Day 10/06/2022								
Totals for Included		12			1,075.00 USD	215.00 USD	17.20 USD	232.20 USD
Totals for Day 10/06/2022		12			1,075.00 USD	215.00 USD	17.20 USD	232.20 USD
Day 10/19/2022								
Totals for Included		1			215.00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 10/19/2022		1			215.00 USD	43.00 USD	3.44 USD	46.44 USD
Day 10/24/2022								
Totals for Included		19			1,505.00 USD	301.00 USD	24.06 USD	325.06 USD
Totals for Day 10/24/2022		19			1,505.00 USD	301.00 USD	24.06 USD	325.06 USD
Day 10/25/2022								
Totals for Included		13			951.00 USD	190.20 USD	15.22 USD	205.42 USD
Totals for Day 10/25/2022		13			951.00 USD	190.20 USD	15.22 USD	205.42 USD
Day 10/27/2022								
Totals for Included		8			215.00 USD	43.00 USD	0.00 USD	43.00 USD
Totals for Day 10/27/2022		8			215.00 USD	43.00 USD	0.00 USD	43.00 USD
Day 10/28/2022								
Totals for Included		7			736.00 USD	147.20 USD	0.00 USD	147.20 USD
Totals for Day 10/28/2022		7			736.00 USD	147.20 USD	0.00 USD	147.20 USD
Day 10/31/2022								
Totals for Included		5			215.00 USD	43.00 USD	0.00 USD	43.00 USD
Totals for Day 10/31/2022		5			215.00 USD	43.00 USD	0.00 USD	43.00 USD
Totals for User Name KAGEDAN,EITAN G (21058896)		82			6,127.00 USD	1,225.40 USD	79.38 USD	1,304.78 USD
User Name MASCIOLI, GIAN M (21386694)								
Day 10/06/2022								
Totals for Included		42			2,088.00 USD	417.60 USD	33.41 USD	451.01 USD
Totals for Day 10/06/2022		42			2,088.00 USD	417.60 USD	33.41 USD	451.01 USD
Day 10/24/2022								
Totals for Included		4			0.00 USD	0.00 USD	0.00 USD	0.00 USD
Totals for Day 10/24/2022		4			0.00 USD	0.00 USD	0.00 USD	0.00 USD
Day 10/27/2022								
Totals for Included		7			153.00 USD	30.60 USD	0.00 USD	30.60 USD
Totals for Day 10/27/2022		7			153.00 USD	30.60 USD	0.00 USD	30.60 USD
Totals for User Name MASCIOLI, GIAN M (21386694)		53			2,241.00 USD	448.20 USD	33.41 USD	481.61 USD
User Name WYTGUL, ROBERT A (9372048)								
Day 10/09/2022								
Totals for Included		30			1,228.00 USD	245.60 USD	19.65 USD	265.25 USD
Totals for Day 10/09/2022		30			1,228.00 USD	245.60 USD	19.65 USD	265.25 USD
[REDACTED]								
[REDACTED]		1						
[REDACTED]		1						
[REDACTED]								
[REDACTED]		1						
[REDACTED]		1						
[REDACTED]								
[REDACTED]		1						
[REDACTED]		1						
[REDACTED]								
[REDACTED]		1						
[REDACTED]		1						
[REDACTED]								
[REDACTED]		1						
[REDACTED]		1						
Day 10/26/2022								
Totals for Included		56			2,733.00 USD	546.60 USD	0.00 USD	546.60 USD
Totals for Day 10/26/2022		56			2,733.00 USD	546.60 USD	0.00 USD	546.60 USD
Day 10/27/2022								
Totals for Included		5			215.00 USD	43.00 USD	0.00 USD	43.00 USD
Totals for Day 10/27/2022		5			215.00 USD	43.00 USD	0.00 USD	43.00 USD
[REDACTED]								

11/11/2014

EXHIBIT A - 217

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

RSM Election Solutions LLC



INVOICE #: 2022_October
DATE: November 1, 2022

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
6.5	Hours	Hours worked on Pennsylvania Election Reviews	\$250	\$1,625.00

Total \$1,625.00

Commonwealth (Fulton County): in-house duplicating charges (\$270.60)

11/04/2022	raw7042	Wiygul, Robert	Shareholder	02	Duplicating	167.10
11/04/2022	raw7042	Wiygul, Robert	Shareholder	02	Duplicating	72.00
11/04/2022	raw7042	Wiygul, Robert	Shareholder	02	Duplicating	31.50

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA
Date Range: November 01, 2022 - November 30, 2022
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]								
Client 28000-050								
User Name H LL,JOHN B (18690333)								
[REDACTED]								
[REDACTED]								
[REDACTED]								
Day 11/11/2022								
Totals for Included		49			3,010 00 USD	602.00 USD	48.16 USD	650.16 USD
Totals for Day 11/11/2022		49			3,010 00 USD	602.00 USD	48.16 USD	650.16 USD
[REDACTED]								
[REDACTED]								
[REDACTED]								
User Name HUNTER,MARIA J (4847574)								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
Day 11/15/2022								
Totals for Included		46			215 00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 11/15/2022		46			215 00 USD	43.00 USD	3.44 USD	46.44 USD
[REDACTED]								
User Name KAGEDAN,EITAN G (21058896)								
Day 11/02/2022								
Totals for Included		4			674 00 USD	134.80 USD	0.00 USD	134 80 USD
Totals for Day 11/02/2022		4			674 00 USD	134.80 USD	0.00 USD	134 80 USD
Day 11/03/2022								
Totals for Included		14			1,145 00 USD	229.00 USD	18.32 USD	247 32 USD
Totals for Day 11/03/2022		14			1,145 00 USD	229.00 USD	18.32 USD	247 32 USD
Day 11/04/2022								
Totals for Included		8			1,000 00 USD	200.00 USD	16.00 USD	216 00 USD
Totals for Day 11/04/2022		8			1,000 00 USD	200.00 USD	16.00 USD	216 00 USD
Day 11/08/2022								
Totals for Included		20			1,290 00 USD	258.00 USD	20.64 USD	278 64 USD
Totals for Day 11/08/2022		20			1,290 00 USD	258.00 USD	20.64 USD	278 64 USD
Day 11/09/2022								
Totals for Included		8			430 00 USD	86.00 USD	0.00 USD	86 00 USD
Totals for Day 11/09/2022		8			430 00 USD	86.00 USD	0.00 USD	86 00 USD
Day 11/10/2022								
Totals for Included		6			1,290 00 USD	258.00 USD	20.64 USD	278 64 USD
Totals for Day 11/10/2022		6			1,290 00 USD	258.00 USD	20.64 USD	278 64 USD

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA
Date Range: November 01, 2022 - November 30, 2022
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Day 11/15/2022					
Totals for Included	15	860 00 USD	172.00 USD	13.76 USD	185.76 USD
Totals for Day 11/15/2022	15	860 00 USD	172.00 USD	13.76 USD	185.76 USD
Day 11/17/2022					
Totals for Included	3	215 00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 11/17/2022	3	215 00 USD	43.00 USD	3.44 USD	46.44 USD
User Name WIYGUL,ROBERT A (9372048)					
Day 11/08/2022					
Totals for Included	6	430 00 USD	86.00 USD	6.88 USD	92 88 USD
Totals for Day 11/08/2022	6	430 00 USD	86.00 USD	6.88 USD	92 88 USD
Day 11/09/2022					
Totals for Included	3	215 00 USD	43.00 USD	0.00 USD	43 00 USD
Totals for Day 11/09/2022	3	215 00 USD	43.00 USD	0.00 USD	43 00 USD
Day 11/11/2022					
Totals for Included	29	648 00 USD	129.60 USD	10.37 USD	139 97 USD
Totals for Day 11/11/2022	29	648 00 USD	129.60 USD	10.37 USD	139 97 USD
Day 11/12/2022					
Totals for Included	4	630 00 USD	126.00 USD	10.08 USD	136 08 USD
Totals for Day 11/12/2022	4	630 00 USD	126.00 USD	10.08 USD	136 08 USD
Day 11/13/2022					
Totals for Included	11	583 00 USD	116.60 USD	9.33 USD	125 93 USD
Totals for Day 11/13/2022	11	583 00 USD	116.60 USD	9.33 USD	125 93 USD
Day 11/14/2022					
Totals for Included	5	521 00 USD	104.20 USD	8.34 USD	112 54 USD
Totals for Day 11/14/2022	5	521 00 USD	104.20 USD	8.34 USD	112 54 USD
Day 11/15/2022					
Totals for Included	72	4,234 00 USD	846.80 USD	67.74 USD	914 54 USD
Totals for Day 11/15/2022	72	4,234 00 USD	846.80 USD	67.74 USD	914 54 USD
Day 11/16/2022					
Totals for Included	6	215 00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 11/16/2022	6	215 00 USD	43.00 USD	3.44 USD	46.44 USD
Day 11/17/2022					
Totals for Included	10	215 00 USD	43.00 USD	4.00 USD	46.44 USD

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Category	Sub-category	Value	Unit
Category 1	Sub-category 1.1	100	100
	Sub-category 1.2	200	200
	Sub-category 1.3	300	300
	Sub-category 1.4	400	400
	Sub-category 1.5	500	500
Category 2	Sub-category 2.1	600	600
	Sub-category 2.2	700	700

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2022_November
DATE: December 1, 2022

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
7	Hours	Consulting hours worked on Pennsylvania Election Reviews (review of affidavit and supporting materials and conferences with counsel in preparation for testimony at hearing)	\$250	\$1,750.00
14.5	Hours	Testimony hours for Pennsylvania Election Reviews (time at court during hearing on November 9 and 10)	\$350	\$5,075.00
4	Hours	Travel hours for Pennsylvania Election Reviews (time traveling to/from court for the hearing on November 9 and 10)	\$175	\$700.00
1	Each	Reimbursable Travel Cost (See Attached)	N/A	\$601.91

Total \$8,126.91

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Madjid on November 9
Date: Wednesday, November 9, 2022 2:45:23 PM

----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Wed, Nov 9, 2022, 12:22 PM
Subject: Your ride with Madjid on November 9
To: [REDACTED]

Lyft Pink



NOVEMBER 9, 2022 AT 10:04 AM

Thanks for riding with Madjid!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (118.92mi, 2h 7m 16s)	\$138.99
Tip	\$42.00



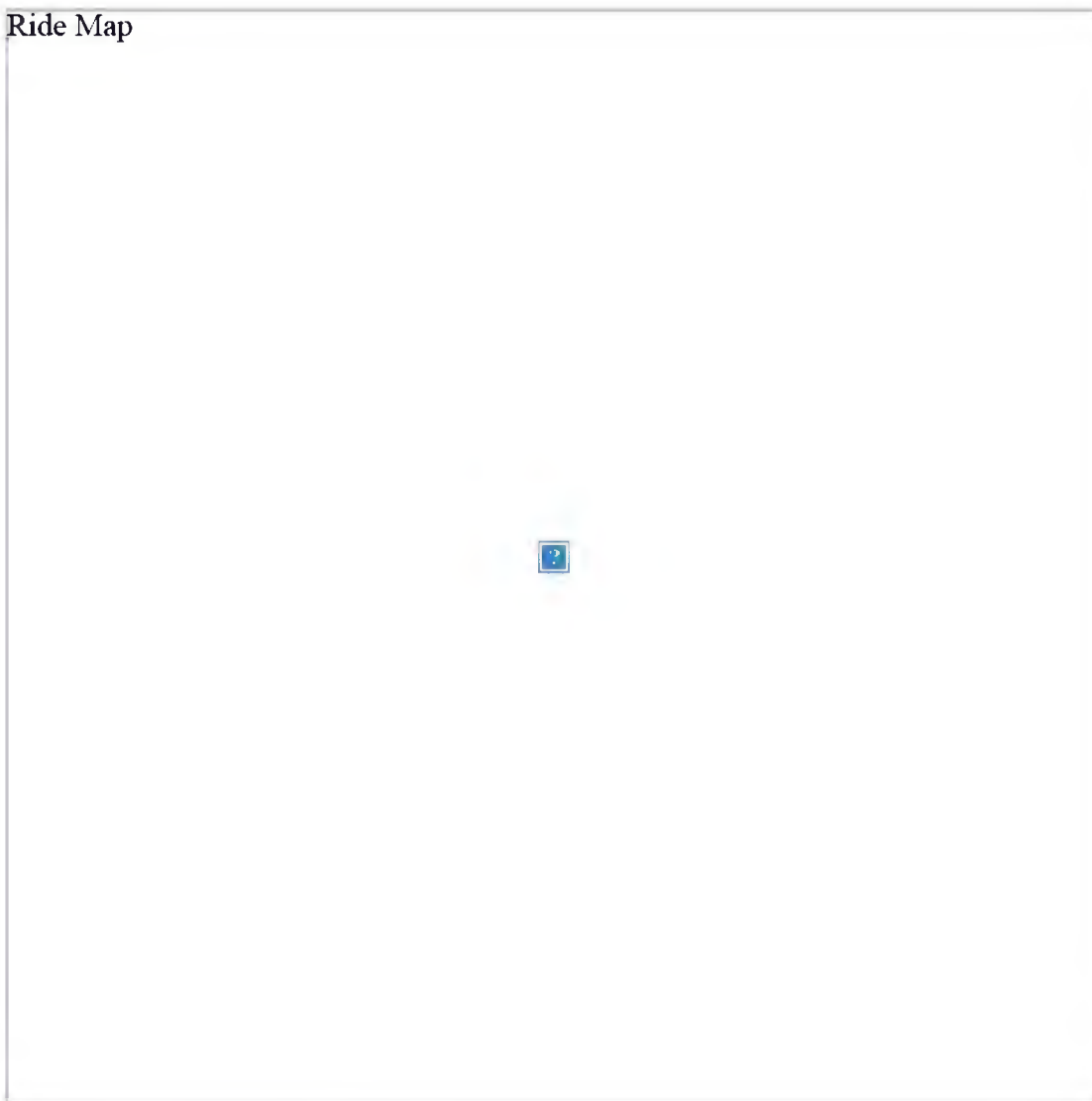
Visa *9429

\$180.99

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on November 9, 2022. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



☐ **Pickup** 10:04 AM

901 N Glebe Rd, Arlington, VA

☐ **Drop-off** 12:11 PM

1 Finance Building, Harrisburg, PA

Tip driver

Capital Restaurant by C&J Catering
903 Spring Garden Dr
Middletown, PA 17057
717-576-1610

Take Out #42

Server: Shaneiqua M.
Receipt: 1212231

11/09/2022
12:42PM
Register-4

1 x Large Fresh Brew Coffee
1 x Capital Fajita Wrap

2.00
7.99

Subtotal
Tax

10.68
0.64

Balance Due

11.32

Card

11.32

Paid

Thank you!

Open Monday through Friday
7:30 am to 3:00 pm

www.candycatering.com
Please let us know how we did
<https://www.surveymonkey.com/r/L2JTR04>

EXHIBIT A - 226

Exhibit 013

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Brandon on November 9
Date: Wednesday, November 9, 2022 6:19:05 PM

----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Wed, Nov 9, 2022, 6:03 PM
Subject: Your ride with Brandon on November 9
To: [REDACTED]

Lyft Pink



NOVEMBER 9, 2022 AT 5:37 PM

Thanks for riding with Brandon!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (3.76mi, 10m 23s)	\$11.99
Priority Pickup Upgrade	\$3.45
Lyft Pink free Priority Pickup upgrade	-\$3.45
Tip	\$3.00



Visa *9429

\$14.99

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on November 9, 2022. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Mehdi on November 9
Date: Wednesday, November 9, 2022 6:45:38 PM

----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Wed, Nov 9, 2022, 6:44 PM
Subject: Your ride with Mehdi on November 9
To: [REDACTED]

Lyft Pink



NOVEMBER 9, 2022 AT 6:33 PM

Thanks for riding with Mehdi!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (3.26mi, 8m 22s)	\$12.99
Priority Pickup Upgrade	\$3.15
Lyft Pink free Priority Pickup upgrade	-\$3.15
Tip	\$3.00



Visa *9429

\$15.99

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on November 9, 2022. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Alex on November 9
Date: Wednesday, November 9, 2022 9:10:20 PM

----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Wed, Nov 9, 2022, 9:06 PM
Subject: Your ride with Alex on November 9
To: [REDACTED]

Lyft Pink



NOVEMBER 9, 2022 AT 8:47 PM

Thanks for riding with Alex!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (3.57mi, 9m 59s)	\$11.71
Priority Pickup Upgrade	\$2.17
Lyft Pink free Priority Pickup upgrade	-\$2.17
Tip	\$3.00



Visa *9429

\$14.71

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on November 9, 2022. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

TownePlace Suites[®] Harrisburg Hershey
 450 Friendship Road, Harrisburg, Pa 17111 P 717.558.0200
Marriott.com/HARTS

R. Macias

Room: 423
 Room Type: STDO
 Number of Guests: 1
 Rate: \$113.00 Clerk:

Arrive: 09Nov22 Time: 05:51PM Depart: 10Nov22 Time: 12:00PM Folio Number: 52149

DATE	DESCRIPTION	CHARGES	CREDITS
09Nov22	Rm Chg STDO T1 Transient	113.00	
09Nov22	Occupancy Sales Tax	6.78	
09Nov22	City Tax	5.65	
09Nov22	Parking Recapture Fee	2.13	
09Nov22	Sales Tax	0.13	
10Nov22	Visa		127.69
CARD #: VXXXXXXXXXXXX9710XXXX			
AMOUNT: 127.69			
Auth: 01740d			
This card was electronically swiped on 09Nov22			

BALANCE: 0.00

Marriott Bonvoy Account # XXXXX4563. Your Marriott Bonvoy points/miles earned on your eligible earnings will be credited to your account. Check your Marriott Bonvoy account statement or your online statement for updated activity.

See our "Privacy & Cookie Statement" on Marriott.com.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Mildred on November 10
Date: Friday, November 11, 2022 7:25:53 AM

----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Thu, Nov 10, 2022, 8:02 AM
Subject: Your ride with Mildred on November 10
To: [REDACTED]

Lyft Pink



NOVEMBER 10, 2022 AT 7:43 AM

Thanks for riding with Mildred!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (3.88mi, 13m 5s)	\$11.99
Priority Pickup Upgrade	\$2.58
Lyft Pink free Priority Pickup upgrade	-\$2.58
Tip	\$3.00



Visa *9429

\$14.99

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on November 10, 2022. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with MD on November 10
Date: Thursday, November 10, 2022 9:21:51 PM

----- Forwarded message -----

From: Lyft Receipts <no-reply@lyftmail.com>
Date: Thu, Nov 10, 2022, 9:20 PM
Subject: Your ride with MD on November 10
To: [REDACTED]

Lyft Pink



NOVEMBER 10, 2022 AT 7:21 PM

Thanks for riding with MD!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (120.15mi, 1h 56m 47s)	\$171.23
Tip	\$50.00



Visa *9429

\$221.23

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on November 10, 2022. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.



Videography
Post-Production Editing
Trial Presentation Audio
Transcription
Portable Video Conferencing
Translation Services

BILL TO:

Robert Wiygul, Esquire
Hangley Aronchick Segal Pudlin &
Schiller
One Logan Square - 27th Floor
18th & Cherry Street
Philadelphia, PA 19103

INVOICE:	FR2022-562
DATE:	11/11/2022
PAYMENT:	\$
BALANCE DUE:	\$2,379.00

CAPTION	FILE/CLAIM NO.	JOB NO.	REP
Fulton County v Commonwealth PA		1734LD	LT/DB/SCR

[illegible]

Subtotal:
2,379.00

THANK YOU FOR YOUR BUSINESS!

**FrontinoReporting, LLC**

Frontino/DeFilippis Court Reporting Agency
34 North Front Street
Philadelphia, PA 19106
215 922-2133
billing@frontinoreporting.com
EIN 26-1643920

Videography
Post-Production Editing
Trial Presentation Audio
Transcription
Portable Video Conferencing
Translation Services

Local - National - Worldwide • Video Conferencing Center • Philadelphia and Cherry Hill

BILL TO:

Robert Wiygul, Esquire
Hangley Aronchick Segal Pudlin &
Schiller
One Logan Square - 27th Floor
18th & Cherry Street
Philadelphia, PA 19103

INVOICE: FR2022-577**DATE: 11/17/2022****PAYMENT: \$****BALANCE DUE: \$5,635.75**

CAPTION	FILE/CLAIM NO.	JOB NO.	REP
Fulton Cty v Commonwealth of PA		1715LD	FLF

DATE	DESCRIPTION	QTY	RATE	AMOUNT
11/09/2022	Orig & 2 Daily Copy 11-9-2022 Hearing Copies of transcripts also sent to: Bridget Holbein and Paul Ritchey Original filed with the Prothonotary's Office Daily copy finals were delivered next day	301	14.00	4,214.00
11/09/2022	Rough Draft 11-9-2022 Hearing Copies of rough transcripts also sent to: Bridget Holbein and Paul Ritchey All roughs were delivered end of day	301	3.00	903.00
11/09/2022	Appearance Fee In-Person Appearance	1	300.00	300.00
11/09/2022	Travel Travel - 350 miles Reporter traveled from Indiana to Harrisburg	350	0.625	218.75

Subtotal:
5,635.75

THANK YOU FOR YOUR BUSINESS!

**FrontinoReporting, LLC**

Frontino/DeFilippis Court Reporting Agency
34 North Front Street
Philadelphia, PA 19106
215 922-2133
billing@frontinoreporting.com
EIN 26-1643920

Videography
Post-Production Editing
Trial Presentation Audio
Transcription
Portable Video Conferencing
Translation Services

Local - National - Worldwide • Video Conferencing Center • Philadelphia and Cherry Hill

BILL TO:

Robert Wiygul, Esquire
Hangley Aronchick Segal Pudlin &
Schiller
One Logan Square - 27th Floor
18th & Cherry Street
Philadelphia, PA 19103

INVOICE: FR2022-578**DATE: 11/17/2022****PAYMENT: \$****BALANCE DUE: \$5,638.00**

CAPTION	FILE/CLAIM NO.	JOB NO.	REP
Fulton Cty v Commonwealth of PA		1716LD	FLF

DATE	DESCRIPTION	QTY	RATE	AMOUNT
11/10/2022	Orig & 2 Daily Copy 11-10-2022 Hearing Copies of transcripts also sent to: Bridget Holbein and Paul Ritchey Original filed with the Prothonotary's Office Daily copy finals were delivered next day	314	14.00	4,396.00
11/10/2022	Rough Draft 11-10-2022 Hearing Copies of rough transcripts also sent to: Bridget Holbein and Paul Ritchey All roughs were delivered end of day	314	3.00	942.00
11/10/2022	Appearance Fee In-Person Appearance	1	300.00	300.00

Subtotal:
5,638.00

THANK YOU FOR YOUR BUSINESS!

**FrontinoReporting, LLC**

Frontino/DeFilippis Court Reporting Agency
34 North Front Street
Philadelphia, PA 19106
215 922-2133
billing@frontinoreporting.com
EIN 26-1643920

Videography
Post-Production Editing
Trial Presentation Audio
Transcription
Portable Video Conferencing
Translation Services

Local - National - Worldwide • Video Conferencing Center • Philadelphia and Cherry Hill

BILL TO:

Robert Wiygul, Esquire
Hangley Aronchick Segal Pudlin &
Schiller
One Logan Square - 27th Floor
18th & Cherry Street
Philadelphia, PA 19103

INVOICE: FR2022-579**DATE: 11/17/2022****PAYMENT: \$****BALANCE DUE: \$2,038.05**

CAPTION	FILE/CLAIM NO.	JOB NO.	REP
Fulton Cty v Commonwealth of PA		1716LD	FLF

DATE	DESCRIPTION	QTY	RATE	AMOUNT
11/14/2022	Orig & 2 Daily Copy 11-14-2022 Hearing Copies of transcripts also sent to: Bridget Holbein and Paul Ritchey Original filed with the Prothonotary's Office Daily copy finals were delivered next day	98	14.00	1,372.00
11/14/2022	Rough Draft 11-14-2022 Hearing Copies of rough transcripts also sent to: Bridget Holbein and Paul Ritchey All roughs were delivered end of day	98	3.00	294.00
11/14/2022	Appearance Fee In-Person Appearance	1	300.00	300.00
11/16/2022	Postage UPS overnight original transcripts to the Prothonotary's Office	1	72.05	72.05

Subtotal:
2,038.05

THANK YOU FOR YOUR BUSINESS!

Thanks for tipping, Maria

We hope you enjoyed your ride this evening

Total	\$12.37
-------	---------

rip fare	\$7.24
----------	--------

Subtotal	\$7.24
Wait Time	\$0.02
Booking Fee	\$1.66
Temporary Fuel Surcharge	\$0.45
Tips	\$3.00



Payments

 V sa ****6027	\$9.37
11/9/22 6:19 PM	
 V sa ****6027	\$3.00
11/9/22 9:45 PM	

[Visit the trip page](#) for more information including invoices (where available)

You rode with ANICSHEA

UberXL 1.17 miles 11 min

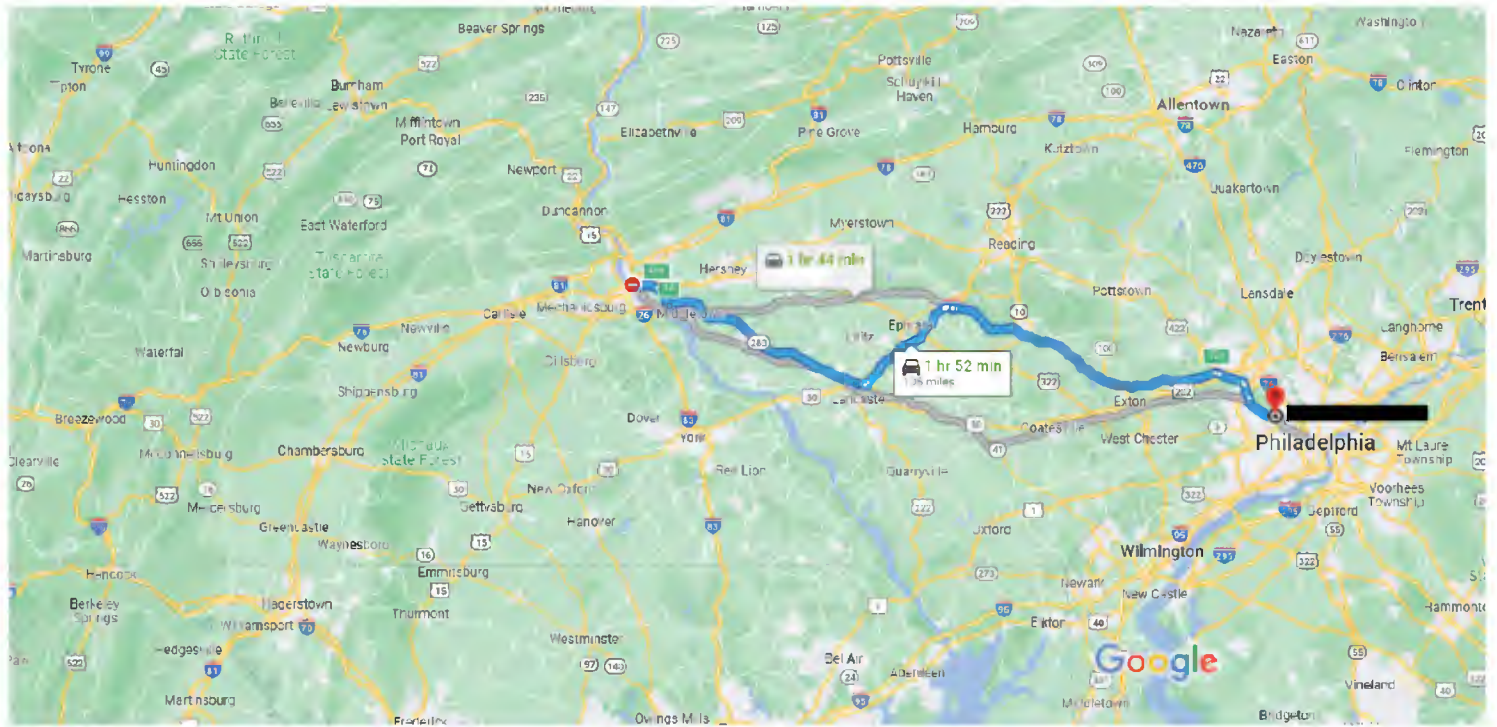
	7:29 AM 2 S 2nd St Harrisburg PA 17101 US
	7:41 AM 601 Commonwealth Ave Harrisburg PA 17120 US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.



1 N 2nd St, Harrisburg, PA 17110 to [REDACTED]

Drive 105 miles, 1 hr 52 min



Map data ©2022 Google

10 mi

1 N 2nd St
Harrisburg, PA 17110

This route has tolls.

Get on I-83 N from S Cameron St and Paxton St

6 min (1.6 mi)

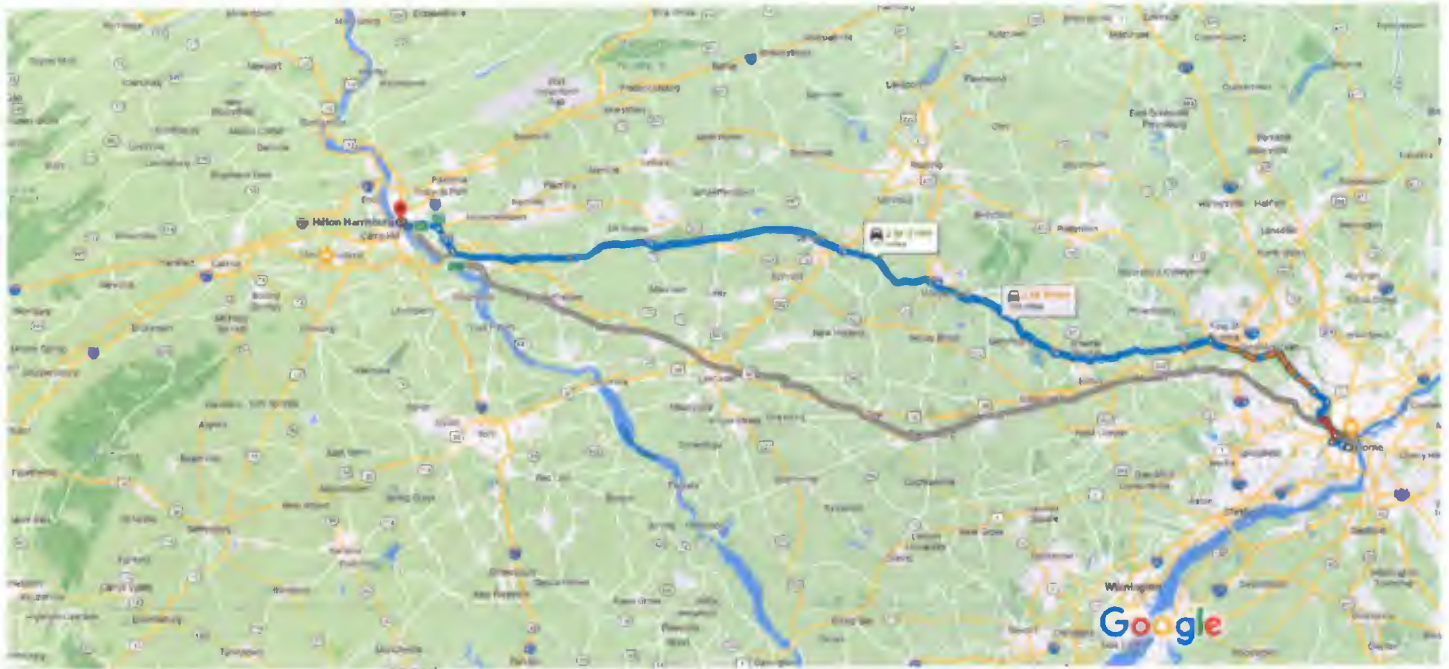
- ↑ 1. Head northeast on Market St toward S Court St
0.2 mi
- ↘ 2. Turn right onto S 4th St
0.1 mi
- ↑ 3. Continue onto Mulberry St
0.1 mi
- ↘ 4. Turn right toward S Cameron St
0.1 mi
- ↘ 5. Turn right onto S Cameron St
0.4 mi
- ↶ 6. Turn left onto Paxton St
0.2 mi
- ↘ 7. Turn right onto S 13th St
0.2 mi
- ↗ 8. Turn left onto the ramp to Hershey
0.2 mi

105 miles x 2 = 210 miles
@ .625/mile
\$131.25 total



Home [REDACTED] to Hilton Harrisburg,
One N 2nd St, Harrisburg, PA 17101

Drive 107 miles, 2 hr 5 min



Map data ©2022 Google

5 mi

⚠ This route has tolls.

Get on I-76 W from [REDACTED] S Broad St and Lombard St

13 min (2.4 mi)

- ↑ 1. Head west on Catharine St toward S 8th St
167 ft
- ↩ 2. Turn left onto S 8th St
220 ft
- ↷ 3. Turn right at the 1st cross street onto Christian St
Pass by Dunkin' (on the right in 0.5 mi)
0.5 mi
- ↷ 4. Turn right onto S Broad St
0.3 mi
- ↩ 5. Turn left onto Lombard St
1.0 mi
- ↩ 6. Lombard St turns left and becomes S 27th St
344 ft
- ↷ 7. Turn right onto South St/S St Bridge
0.2 mi
- ↑ 8. Turn right to merge onto I-76 W
0.1 mi

PAW

28000-050
round-trip travel between
Philadelphia and Harrisburg
for evidentiary hearing

$$214 \text{ miles} \times \$0.625/\text{mile} = \$133.75$$

Post Date	Exit Date Time	Transaction	Tag	License	Entry	Exit	Class	Amount
11/12/2022	11/10/2022 20:44:48	E-ZPass Toll	[REDACTED]		Harrisburg East Shore	Valley Forge	1	\$9.90
11/10/2022	11/08/2022 17:59:48	E-ZPass Toll	[REDACTED]		Reading	Harrisburg East Shore	1	\$4.60
11/10/2022	11/08/2022 17:12:28	E-ZPass Toll	[REDACTED]		Valley Forge	Reading	1	\$5.50
Total Amount								to 115; \$20.00

RAW

28000-050

round-trip travel between Philadelphia
and Harrisburg for evidentiary hearing



HILTON HARRISBURG
ONE NORTH SECOND STREET
HARRISBURG, PA 17101
United States of America
TELEPHONE 717-233-6000 • FAX (717) 237-6271
Reservations
www.hilton.com or 1 800 HILTONS

KAGEDAN, EITAN

Room No: 527/D2
Arrival Date: 11/8/2022 6:25:00 PM
Departure Date: 11/10/2022 1:34:00 PM
Adult/Child: 1/0
Cashier ID: ACORREA16
Room Rate: 242.00
AL:
HH #
VAT #
Folio No/Che 1525352 A

UNITED STATES OF AMERICA

Confirmation Number: 3305208089

HILTON HARRISBURG 11/10/2022 1:34:00 PM

DATE	REF NO	DESCRIPTION	CHARGES
11/8/2022	7161934	GUEST ROOM	\$242.00
11/8/2022	7161934	HOTEL OCCUPANCY ROOM TAX	\$14.52
11/8/2022	7161934	ROOM LOCAL TAX	\$12.10
11/9/2022	7162198	*AD LIB CRAFT KITCHEN & BAR	\$18.90
11/9/2022	7163039	GUEST ROOM	\$264.00
11/9/2022	7163039	HOTEL OCCUPANCY ROOM TAX	\$15.84
11/9/2022	7163039	ROOM LOCAL TAX	\$13.20
11/10/2022	7163571	VS *2781	(\$580.56)
BALANCE			\$0.00

EXPENSE REPORT SUMMARY

	11/8/2022	11/9/2022	STAY TOTAL
ROOM AND TAX	\$268.62	\$293.04	\$561.66
FOOD AND BEVERAGE	\$0.00	\$18.90	\$18.90
DAILY TOTAL	\$268.62	\$311.94	\$580.56

Hilton Honors(R) stays are posted within 72 hours of checkout. To check your earnings or book your next stay at more than 6,500+ hotels and resorts in 119 countries, please visit [Honors.com](https://www.hilton.com/honors)

Thank you for choosing Hilton. You'll get more when you book directly with us - more destinations, more points, and more value. Book your next stay at [hilton.com](https://www.hilton.com).

CREDIT CARD DETAIL

APPR CODE	05656D	MERCHANT ID	000426759
CARD NUMBER	VS *2781	EXP DATE	08/23
TRANSACTION ID	7163571	TRANS TYPE	Sale

Hunter, Maria

1120/D2
11/8/2022 8:16:00 PM
11/10/2022

-- 0
UNITED STATES OF AMERICA

2/0
258.50
OGEXR1

Rate Plan:
HH #
AL:
Car:

Confirmation Number: 3305549779

11/10/2022

11/8/2022	7161709	*VALET PARKING - OVERNIGHT	\$24.00 \$10.00
11/8/2022	7161710	GUEST ROOM	\$258.50
11/8/2022	7161710	HOTEL OCCUPANCY ROOM TAX	\$15.51
11/8/2022	7161710	ROOM LOCAL TAX	\$12.93
11/9/2022	7162126	*AD LIB CRAFT KITCHEN & BAR	\$3.00 receipt attached
11/9/2022	7162789	*VALET PARKING OVERNIGHT	\$24.00 \$10.00
11/9/2022	7162790	GUEST ROOM	\$258.50
11/9/2022	7162790	HOTEL OCCUPANCY ROOM TAX	\$15.51
11/9/2022	7162790	ROOM LOCAL TAX	\$12.93
		BALANCE	\$624.88 \$596.88

EXPENSE REPORT SUMMARY

	11/8/2022	11/9/2022	STAY TOTAL
ROOM AND TAX	\$286.94	\$286.94	\$573.88
FOOD AND BEVERAGE	\$0.00	\$3.00	\$3.00
MISCELLANEOUS	\$24.00	\$24.00	\$48.00 \$20.00
DAILY TOTAL	\$310.94	\$313.94	\$624.88 \$596.88

1525287 A



ONE NORTH SECOND STREET
HARRISBURG, PA 17101
United States of America
TELEPHONE 717-233-6000 • FAX (717) 237-6271
Reservations
www.hilton.com or 1 800 HILTONS

Wiygul, Robert

Room No: 1307/D2
Arrival Date: 11/8/2022 6:26:00 PM
Departure Date: 11/10/2022 7:32:00 AM
Adult/Child: 1/0
Cashier ID: JENNIFERM
Room Rate: 237.99
AL:
HH #
VAT #
Folio No/Che 1525273 A

UNITED STATES OF AMERICA

Confirmation Number: 3314744018

HILTON HARRISBURG 11/10/2022 7:32:00 AM

DATE	REF NO	DESCRIPTION	CHARGES
11/8/2022	7161524	*AD LIB CRAFT KITCHEN & BAR	\$87.00 -\$139.66 - itemized
11/8/2022	7161774	*OVERNIGHT SELF PARKING	\$10.00 receipt
11/8/2022	7161775	GUEST ROOM	\$237.99 attached
11/8/2022	7161775	HOTEL OCCUPANCY ROOM TAX	\$14.28
11/8/2022	7161775	ROOM LOCAL TAX	\$11.90
11/9/2022	7162197	*AD LIB CRAFT KITCHEN & BAR	\$14.00 -\$26.50 - itemized
11/9/2022	7162866	*OVERNIGHT SELF PARKING	\$10.00 receipt
11/9/2022	7162867	GUEST ROOM	\$264.00 attached
11/9/2022	7162867	HOTEL OCCUPANCY ROOM TAX	\$15.84
11/9/2022	7162867	ROOM LOCAL TAX	\$13.20
11/10/2022	7163305	VS *1754	\$678.21 -(\$743.37)
BALANCE			\$0.00

EXPENSE REPORT SUMMARY

	11/8/2022	11/9/2022	STAY TOTAL
ROOM AND TAX	\$264.17	\$293.04	\$557.21
FOOD AND BEVERAGE	\$139.66	\$26.50 \$14.00	\$166.16 \$153.66
MISCELLANEOUS	\$10.00	\$10.00	\$20.00
DAILY TOTAL	\$413.83	\$329.54	\$743.37 \$678.21

Hilton Honors(R) stays are posted within 72 hours of checkout. To check your earnings or book your next stay at more than 6,500+ hotels and resorts in 119 countries, please visit Honors.com

Thank you for choosing Hilton. You'll get more when you book directly with us - more destinations, more points, and more value. Book your next stay at hilton.com.

CREDIT CARD DETAIL

APPR CODE	300145	MERCHANT ID	000426759
CARD NUMBER	VS *1754	EXP DATE	03/25
TRANSACTION ID	7163305	TRANS TYPE	Sale

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 11/8/2022 Time: 9:50:10 PM
Check: 587424 Table: 310
Covers: 3 Person#: 1,2,3
Server #: 115 Opened: 8:30:00 PM

2	Pellegrino	14.00
1	Caesar Salad	9.00
1	Asparagus Flatbread	16.00
1	AL House Salad	9.00
2	Fish Taco	30.00
2	Pineapple Cheesecake	24.00
1	Brulee	9.00

FOOD TOTAL	111.00
BEVERAGE TOTAL	0.00
SUB-TOTAL	111.00
Total Tax	6.66

TOTAL ~~117.66~~ -- \$87.00

THANK YOU!
Jason

Thank you for visiting!

MJL
EGK
RAW

28000-050

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 11/9/2022 Time: 7:40:36 AM
Check: 587490 Table: 201
Covers: 1 Person#: 1
Server #: 102 Opened: 7:40:00 AM

1	Coffee	3.00
1	Omelet Du Jour	13.50
1	Orange	4.50

FOOD TOTAL	21.00
BEVERAGE TOTAL	0.00
SUB-TOTAL	21.00
Total Tax	1.26

TOTAL ~~22.26~~ \$14.00

THANK YOU!
A Parker

Thank you for visiting!

RAW

28000-050

From: [Uber Receipts](#)
To: [Kagedan, Eitan G.](#)
Subject: [Business] Your Monday morning trip with Uber
Date: Monday, November 14, 2022 7:46:38 PM

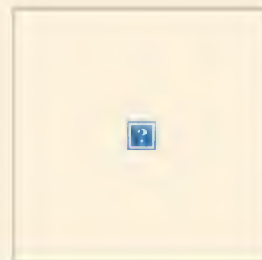
[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]



Total \$8.89
November 14, 2022

Thanks for riding, Eitan

We hope you enjoyed your ride
this morning.



Total \$8.89

Trip fare	\$6.79
-----------	--------

Subtotal	\$6.79
----------	--------

Booking Fee <input type="checkbox"/>	\$1.53
--------------------------------------	--------

Temporary Fuel Surcharge <input type="checkbox"/>	\$0.45
---	--------

Philadelphia TNC Assessment Fee	\$0.12
---------------------------------	--------

Payments

Visa ****2781 11/14/22 7:46 PM	\$8.89
--	--------

[Download PDF](#)

Everest Discovery LLC
1500 Walnut St Ste 1010
Philadelphia, PA 19102
+1 2153251800
ap@everestdiscovery.com
www.everestdiscovery.com



INVOICE

BILL TO

Maria Hunter
Hangley Aronchick Segal
Pudlin & Schiller

INVOICE # 221616

DATE 11/17/2022

DUE DATE 12/17/2022

TERMS Net 30

BILLING REFERENCE

28000-050 - M. Hunter

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	Blowback of B/W images	4,428	0.12	531.36
	Tabs	138	0.45	62.10
	Binders - 2 inch	2	10.00	20.00
	Binders - 4 inch	2	20.00	40.00

Thank you as always for allowing Everest
Discovery to be your trusted service provider.

BALANCE DUE

\$653.46

Everest Discovery LLC
1500 Walnut St Ste 1010
Philadelphia, PA 19102
+1 2153251800
ap@everestdiscovery.com
www.everestdiscovery.com



INVOICE

BILL TO

Maria Hunter
Hangley Aronchick Segal
Pudlin & Schiller

INVOICE # 221622

DATE 11/17/2022

DUE DATE 12/17/2022

TERMS Net 30

BILLING REFERENCE

28000-050 - M. Hunter

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	Blowback of B/W images	19,760	0.12	2,371.20
	Blowback of color images	784	0.75	588.00
	Tabs	364	0.45	163.80
	Manilla folders	52	1.50	78.00
	Binders - 2 inch	7	10.00	70.00
	Binders - 5 inch	7	30.00	210.00

Thank you as always for allowing Everest
Discovery to be your trusted service provider.

BALANCE DUE

\$3,481.00

TRIAL SNACKS



OUR Favorite Local Supermarke

Store 613 Dir Tom Meehan
Main: (610) 668-1738
829 Montgomery Ave
Penn Valley PA 19072

GROCERY

GRANOLA BARS	3.49 S
Regular Price	4.29
Sale Savings	0.80-
SNYDERS PRETZELS	3.99 S
Regular Price	4.79
Sale Savings	0.80-
TATES BAKE SHOP CK	5.99 S
Regular Price	6.49
Sale Savings	0.50-

GEN MERCHANDISE

CLIF BAR	8.99 S
TAX	0.00
**** BALANCE	22.46

Credit Purchase 11/08/22 17:24
CARD # *****6027
REF: 382443460270 AUTH: 00092309
PAYMENT AMOUNT 22.46

AL US DEBIT
AID A0000000980840
TVR 0000000000
TSI 0000

Visa	22.46
CHANGE	0.00

TOTAL NUMBER OF ITEMS SOLD = 4
11/08/22 17:24 613 93 152 8893

POINTS EARNED TODAY

Base Points 22
Bonus Points 6
Total 28

Points Towards Next Reward 28 of 100

YOUR CASHIER TODAY WAS SELF

YOUR SAVINGS

Store Savings	2.10
Total	2.10
Total Savings Value	9%

HOW WAS YOUR SHOPPING EXPERIENCE?

WE VALUE YOUR FEEDBACK!

SCAN THE QR CODE BELOW FOR A TWO MINUTE SURVEY



000061309301522211081724

Thank you for shopping Acme!

For ACME FOR U questions call

877-276-9637 or Acmemarkets.com/foru

included on hotel receipt

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 11/10/2022 Time: 7:11:53 AM
Check: 587777 Table: 206
Covers: 2 Person#: 1
Server #: 102 Opened: 7:11:00 AM

1	TOGO Coffee	2.83
---	-------------	------

FOOD TOTAL	2.83
BEVERAGE TOTAL	0.00
SUB-TOTAL	2.83
Total Tax	0.17

TOTAL 3.00

Thank you for visiting!

Capitol Restaurant by C&J Catering
903 Spring Garden Dr
Middletown, PA 17057
717-576-1610

Take Out #76

Server: Shaneiqua M. 11/10/2022
Receipt: 1212666 11:57AM
Register-4

1 x BLT Sandwich	6.99
1 x Avocado	1.75
1 x Geyser Spring Water	1.79

Subtotal	10.53
Tax	0.53

Balance Due	11.06
-------------	-------

Card	11.06
------	-------

Paid

Thank you!

Open Monday through Friday
7:30 am to 3:00 pm

www.candjcatering.com

Please let us know how we did at
<https://www.surveymonkey.com/r/L2JTR5K>

Capitol Restaurant by C&J Catering
903 Spring Garden Dr
Middletown, PA 17057
717-576-1610

Take Out #6

Server: Shaneiqua M. 11/09/2022
Receipt: 1212195 12:32PM
Register-4

16 MYO SALAD	10.24
1 x Geyser Spring Water	1.79

Subtotal	12.03
Tax	0.64

Balance Due	12.67
-------------	-------

Card	12.67
------	-------

Paid

Thank you!

Open Monday through Friday
7:30 am to 3:00 pm

www.candjcatering.com

Please let us know how we did at
<https://www.surveymonkey.com/r/L2JTR5K>

Capitol Restaurant by C&J Catering
903 Spring Garden Dr
Middletown, PA 17057
717-576-1610

Capitol Restaurant by C&J Catering
903 Spring Garden Dr
Middletown, PA 17057
717-576-1610

Take Out #35

Server: Shaneiqua M.
Receipt: 1212224
11/09/2022
12:40PM
Register-4

1 x Italian Cold Cut Sub 7.99
1 x Bottled Soda 2.04
1 x Geyser Spring Water 1.79
1 x Turkey Hill Tea 2.04
1 x Chicken Salad Sand 6.99
1 x Regular Chips 1.20
1 x Fruit Cup 1.99

Subtotal 24.04
Tax 1.33

Balance Due 25.37

Card 25.37

Paid

Thank you!

Open Monday through Friday
7:30 am to 3:00 pm

www.candjcatering.com
Please let us know how we did at
<https://www.surveymonkey.com/r/L2JTR5K>

Take Out #86

Server: Shaneiqua M.
Receipt: 1212676
11/10/2022
12:03PM
Register-4

1 x Italian Cold Cut Sub 7.99
1 x Bottled Soda 2.04
1 x Chicken Salad Sand 6.99
1 x Avocado 1.75
1 x Fruit Cup 1.99
1 x Regular Chips 1.20
1 x Turkey Hill Tea 2.04

Subtotal 24.00
Tax 1.44

Balance Due 25.44

Card 25.44

Paid

Thank you!

Open Monday through Friday
7:30 am to 3:00 pm

www.candjcatering.com
Please let us know how we did at
<https://www.surveymonkey.com/r/L2JTR5K>

Take Out #88

Server: Shaneiqua M.
Receipt: 1212227

11/09/2022
12:40PM
Register-4

1 x Geyser Spring Water 1.79

Subtotal 1.79
Tax 0.00

Balance Due 1.79

Card 1.79

Paid

Thank you!

Open Monday through Friday
7:30 am to 3:00 pm

www.candjcatering.com
Please let us know how we did at
<https://www.surveymonkey.com/r/L2JTR5K>

Capitol Restaurant by C&J Catering
903 Spring Garden Dr
Middletown, PA 17057
717-576-1610



C & Fork
Late 31
Harrisburg, PA 17101

Without waiting!

Pay with Visa, Mastercard and Discover



AMERICAN EXPRESS

warmly welcomed

DON'T *live life* WITHOUT IT

Server: Jenna W

Check #74

Table 11

Guest Count: 4

Ordered:

11/9/22 7:04 PM

1 Ricotta Gnocchi (16)	\$24.00
1 Affogato	\$7.00
1 Polpetta	\$16.00
1 Tiramisu	\$7.00
1 Espresso	\$3.50
1 N/A Surfer Rosa	\$7.00
1 Fennel Pollen Salmon	\$28.00
1 Chocolate Ganache Cheesecake	\$7.00
1 Scallops & Risotto	\$32.00
2 Btl San Pellegrino	\$12.00
1 Sautéed Octopus	\$14.00
1 Whipped Ricotta	\$14.00

Subtotal \$171.50

Tax \$9.87

Total ~~\$181.37~~ **\$116 (4 people)**

Powered by Toast

EXHIBIT A-251

Exhibit I_068



Robert Wiygul

Receipt from Denim Coffee

Denim Coffee via Square <receipts@messaging.squareup.com>

Thu, Nov 10, 2022

Reply-To: Denim Coffee via Square

<CAESPxIAGIFyX21memdthNmajVoZXdybGJvdmd0c250aW5yaXVIMzNzZ3Zydm9ua2NsaJNnY3FxlghkaWFSb2d1ZSigmXOS/b00YwLWluAwOoUHfeDF+8h0gVjnhIn6Lkmatok=@reply2.squa
To: [REDACTED]

Square automatically sends receipts to the email address you used at any Square seller. [Learn more](#)



Let Denim Coffee know how your
experience was

\$10.13

28000 - 050

RAW + EGK

Cold Brew × 1	\$4.00
Half-Half	\$0.00
Cappuccino × 1	\$3.20
Double Whole Milk	\$0.00
Bottle Water × 1	\$1.50
Purchase Subtotal	\$8.70
PA Sales Tax (6%)	\$0.43
Tip	\$1.00
Total	\$10.13



This purchase earned 16 Points. Claim
your Points to earn rewards.

+16

Get your Points

Denim Coffee
717-884-8814



Visa 5623 (Chip)

Nov 10 2022 at 7:47 AM

VISA

#17eO

ROBERT A WIYGUL

Auth code: 164979

AID: A0000000980840

EXHIBIT A - 252

Exhibit I_069

Breakfast
COK + PAW

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 11/10/2022 Time: 7:27:01 AM
Check: 587786 Table: 208
Covers: 2 Person#: 1
Server #: 102 Opened: 7:26:00 AM

2	CONTINENT BUFFET	30.00
FOOD TOTAL		30.00
BEVERAGE TOTAL		0.00
SUB-TOTAL		30.00
Total Tax		1.80

TOTAL 31.80

THANK YOU!
A Parker

†6.00

Thank you for visiting!

PACER Costs December 2022							
Client Code	Date	Time	Pages	Court	Description	Search	Cost
28000-050	12/22/2022	11:28:02	2	PAMDC	Docket Report	1:22-cv-01639-SHR	\$0.20
28000-050	12/22/2022	11:29:33	16	PAMDC	Image6-0	1:22-cv-01639-SHR Document 6-0	\$1.60
28000-050	12/22/2022	11:46:03	18	PAMDC	Image7-0	1:22-cv-01639-SHR Document 7-0	\$1.80
							\$3.60

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA
Date Range: December 01, 2022 - December 31, 2022
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]								
Client 28000-050								
User Name HUNTER,MARIA J (4847574)								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
User Name KAGEDAN,EITAN G (21058896)								
Day 12/06/2022								
Totals for Included		19			2,517.00 USD	503.40 USD	40.27 USD	543.67 USD
Totals for Day 12/06/2022		19			2,517.00 USD	503.40 USD	40.27 USD	543.67 USD
Day 12/15/2022								
Totals for Included		8			710.00 USD	142.00 USD	11.36 USD	153.36 USD
Totals for Day 12/15/2022		8			710.00 USD	142.00 USD	11.36 USD	153.36 USD
Totals for User Name KAGEDAN,EITAN G (21058896)		27			3,227.00 USD	645.40 USD	51.63 USD	697.03 USD
User Name WIYGUL,ROBERT A (9372048)								
Day 12/02/2022								
Totals for Included		3			430.00 USD	86.00 USD	6.88 USD	92.88 USD
Totals for Day 12/02/2022		3			430.00 USD	86.00 USD	6.88 USD	92.88 USD
Day 12/06/2022								
Totals for Included		8			645.00 USD	129.00 USD	10.32 USD	139.32 USD
Totals for Day 12/06/2022		8			645.00 USD	129.00 USD	10.32 USD	139.32 USD
Day 12/07/2022								
Totals for Included		44			2,365.00 USD	473.00 USD	37.84 USD	510.84 USD
Totals for Day 12/07/2022		44			2,365.00 USD	473.00 USD	37.84 USD	510.84 USD
Day 12/08/2022								
Totals for Included		5			215.00 USD	43.00 USD	3.44 USD	46.44 USD
Totals for Day 12/08/2022		5			215.00 USD	43.00 USD	3.44 USD	46.44 USD
Day 12/12/2022								
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD	0.00 USD
Totals for Day 12/12/2022		1			0.00 USD	0.00 USD	0.00 USD	0.00 USD
Totals for User Name WIYGUL,ROBERT A (9372048)		61			3,655.00 USD	731.00 USD	58.48 USD	789.48 USD
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								



Invoice Number	Invoice Date		Page
8-030-98872	Feb 06, 2023	XXXX-X822-1	3 of 4

Ship Date: Jan 31, 2023	Cust. Ref.: 28000-050	Ref.#2:
Payor: Shipper	Ref.#3:	

The Earned Discount for this ship date has been calculated based on a revenue threshold of \$ 35523.04
Fuel Surcharge FedEx has applied a fuel surcharge of 21.25% to this shipment.
Distance Based Pricing, Zone 2
Package sent from: 19102 zip code

Automation	INET	Sender	Recipient
Tracking ID	771171020834	Robert A. Wiygul, Esquire	Kathleen Kotula, Chief Counsel
Service Type	FedEx Standard Overnight	Hangley Aronchick Segal Pudlin	Office of Chief Counsel
Package Type	FedEx Envelope	PHILADELPHIA PA 19103 US	HARRISBURG PA 17120 US
Zone	02		
Packages	1		
Rated Weight	N/A	Transportation Charge	29.54
Delivered	Feb 01, 2023 09:15	Earned Discount	-4.43
Svc Area	A1	Automation Bonus Discount	-1.48
Signed by	D.JOHNSTON	Fuel Surcharge	5.02
FedEx Use	000000000/200/	Total Charge	USD \$28.65

SPECIAL
MASTER'S
EXHIBIT B

**HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER**

Robert A. Wiygul (I.D. No. 310760)
 John B. Hill (I.D. No. 328340)
 Eitan G. Kagedan (I.D. No. 331246)
 One Logan Square, 27th Floor
 Philadelphia, PA 19103-6933
 (215) 568-6200

**GOVERNOR'S OFFICE OF GENERAL
COUNSEL**

Michael J. Fischer (I.D. No. 322311)
 Jacob B. Boyer (I.D. No. 324396)
 333 Market Street, 17th Floor
 Harrisburg, PA 17101
 (717) 460-6786

TUCKER LAW GROUP

Joe H. Tucker, Jr. (I.D. No. 56617)
 Dimitrios Mavroudis (I.D. No. 93773)
 Jessica Rickabaugh (I.D. No. 200189)
 1801 Market Street, Suite 2500
 Philadelphia, PA 19103
 (215) 875-0609

**PENNSYLVANIA DEPARTMENT OF
STATE**

Kathleen M. Kotula (I.D. No. 86321)
 306 North Office Bldg., 401 North Street
 Harrisburg, PA 17120-0500
 (717) 783-1657

OFFICE OF ATTORNEY GENERAL

Karen M. Romano (I.D. No. 88848)
 Strawberry Square, 15th Floor
 Harrisburg, PA 17120
 (717) 787-2717

IN THE COMMONWEALTH COURT OF PENNSYLVANIACounty of Fulton, *et al.*,

Petitioners/Appellees

v.

Secretary of the Commonwealth,

Respondent/Appellant

:

:

:

:

:

:

:

:

:

No. 277 MD 2021

No. 3 MAP 2022

AFFIDAVIT OF ROBERT A. WIYGUL

I, Robert A. Wiygul, hereby state and affirm the following:

1. I am a shareholder in the law firm of Hangley Aronchick Segal Pudlin
 & Schiller (the "Firm") and an attorney licensed to practice in Pennsylvania. The

Firm represents Respondent/Appellant the Acting Secretary of the Commonwealth (the “Secretary”) in the above-captioned action.

2. I submit this Affidavit in support of the Secretary’s Supplemental Application for an Award of Fees and Costs Pursuant to the Special Master’s Order Dated June 2, 2023 (the “Supplemental Application”). The facts set forth herein are based on my personal knowledge and the Firm’s billing records.

3. I previously submitted an affidavit dated May 30, 2023, in support of the Secretary’s Application for an Award of Fees and Costs Pursuant to the Special Master’s Order dated April 28, 2023 (the “Initial Application”), which affidavit I incorporate herein by reference.

4. The Firm’s billing records attached as Exhibit A hereto were made at or near the time of the events they record by, or from information transmitted from, persons with knowledge of the events; were kept in the course of the Firm’s regularly conducted activity; and were made as part of the Firm’s regular practice.

5. The specific work performed by the Firm for which the Secretary seeks reimbursement in the Supplemental Application is itemized in Exhibit A hereto. (We have redacted time entries related to fees for which the Secretary is not seeking reimbursement in the Supplemental Application.) None of the counsel fees identified in Exhibit A were included in the fee amounts set forth in the Secretary’s Initial Application.

6. Attached as Exhibit B hereto is a demonstrative exhibit listing, by date, each of the expenditures of legal-professional time for which the Secretary seeks reimbursement in the Supplemental Application, whether those legal professionals are Firm employees or employees of the TLG Firm. Where not based on Firm billing records, the information in this Exhibit is taken from information in the accompanying Affidavit from Dimitrios Mavroudis of the TLG Firm.

7. Attached as Exhibit C hereto is an itemization and description of the litigation costs the Secretary has incurred and seeks to recover in the Supplemental Application, together with documentation of those costs. None of the costs identified in Exhibit C were included in the cost amounts set forth in the Secretary's Initial Application.

8. As shown in the Affidavit of Dimitrios Mavroudis and Exhibit A hereto, the legal-professional work identified in Exhibit B was actually and necessarily performed in connection with the sanction proceedings in the above-captioned action. The fees and costs identified in Exhibits B and C were actually and necessarily incurred by the Secretary in connection with the sanction proceedings in the above-captioned action.

9. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein

are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn
falsification to authorities.



Dated: June 9, 2023

ROBERT A. WIYGUL

EXHIBIT A

June 7, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40123162

Statement of services rendered and costs incurred through May 31, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/23	Eitan Kagedan	Fulton County: Communicate with R. Macias concerning provisions of court orders addressing impoundment of voting machines.	0.40	120.00
05/01/23	Eitan Kagedan	Fulton County: Review and respond to correspondence with clients (Department of State, OGC, and OAG) to set agenda and time for conference concerning strategy for identification of potential escrow agent.	0.30	90.00
05/02/23	Eitan Kagedan	Fulton County: Confer with M. Hunter concerning fee issues in preparation for assembling application for award of fees and costs.	0.20	60.00
05/02/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning escrow and fee issues in preparation for identifying potential escrow agents and assembling application for award of fees and costs.	0.80	240.00
05/02/23	Eitan Kagedan	Fulton County: Confer with clients concerning escrow and fee issues.	0.40	120.00
05/02/23	Maria Hunter	Fulton County: Review chart of time entries in preparation for assembling documentation in support of application for award of fees and costs.	0.60	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/23	Robert Wiygul	Fulton County: Review file regarding specific election equipment subject to impoundment order and research potential escrow agents; videoconference with clients regarding escrow-agent issues and candidates and preparation of fee petition; telephone conference with E. Kagedan regarding next steps in analyzing firm invoices and preparing fee petition.	1.50	660.00
05/02/23	Robert Wiygul	Fulton County: Review and annotate Pa. Supreme Court decision in preparation for drafting application for fees; research case law regarding propriety of "fees on fees" in support of application.	0.50	220.00
05/03/23	Eitan Kagedan	Fulton County: Review and analyze firm invoices from December 2021 to present to identify compensable time for purposes of application for fees and costs.	3.50	1,050.00
05/03/23	Eitan Kagedan	Fulton County: Prepare for and conduct conference with R. Wiygul and R. Macias to discuss (1) expert views on potential escrow agent and terms of escrow agreement and (2) obtaining additional detail on expert fees in support of application for award of fees and costs.	1.00	300.00
05/03/23	Maria Hunter	Fulton County: Review and update draft spreadsheets itemizing time entries and costs in advance of filing Motion for Fees.	1.30	195.00
05/03/23	Robert Wiygul	Fulton County: Videoconference with R. Macias seeking (1) input regarding potential escrow agent and terms of escrow agreement and (2) additional detail on expert fees in support of application for award of litigation fees and costs.	0.50	220.00
05/04/23	Maria Hunter	Fulton County: Review additional invoices and receipts and update spreadsheet itemizing and describing costs to be included in application for fees and costs.	1.40	210.00
05/04/23	Robert Wiygul	Fulton County: Telephone conference with clients and OGC to discuss status of Fulton County proceedings and accounting in fee petition for time spent by government attorneys.	0.50	220.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/04/23	Robert Wiygul	Fulton County: Email and telephone call to D. Mavroudis regarding affidavit from him in support of fee petition and research regarding compensability of time spent by government attorneys.	0.30	132.00
05/04/23	Robert Wiygul	Fulton County: Review E. Kagedan's mark up of invoices from December 2021 through March 2023 and revise and supplement annotations regarding time entries that should be included in application for fees.	1.80	792.00
05/05/23	Eitan Kagedan	Fulton County: Call with R. Wiygul concerning components of application for fees and costs and identification of supporting affidavits.	0.30	90.00
05/05/23	Eitan Kagedan	Fulton County: Prepare for and conduct conference with counsel for Dominion concerning escrow arrangement.	0.40	120.00
05/05/23	Eitan Kagedan	Fulton County: Review R. Wiygul's suggested revisions to segregation of fees, compare time entries with categories of activities and offer further suggested revisions as appropriate.	1.40	420.00
05/05/23	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding next steps in review and mark up of invoices and drafting of timekeeper affidavits in support of application for fees.	0.20	88.00
05/05/23	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding prospective escrow agents; email to clients regarding same.	0.40	176.00
05/08/23	Eitan Kagedan	Fulton County: Review detailed backup and breakdown of costs on firm invoices to client and review time entries, contemporaneous emails, and related documentation to determine whether and to what extent each itemized cost is subject to reimbursement pursuant to the Supreme Court's sanctions order.	1.90	570.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/09/23	Eitan Kagedan	Fulton County: Continue review of detailed backup and breakdown of costs on firm invoices to client and review time entries, contemporaneous emails, and related documentation to determine whether and to what extent each itemized cost is subject to reimbursement pursuant to the Supreme Court's sanctions order.	1.00	300.00
05/09/23	Eitan Kagedan	Fulton County: Identify individuals for whom affidavits need to be submitted in support of application for fees and costs and develop plan to draft affidavits and obtain signatures from affiants.	0.50	150.00
05/09/23	Eitan Kagedan	Fulton County: Begin drafting Affidavits in Support of Fee Petition.	0.40	120.00
05/09/23	Robert Wiygul	Fulton County: Research caselaw regarding compensability of computerized legal research fees as part of award of attorneys' fees and litigation costs.	0.40	176.00
05/09/23	Robert Wiygul	Fulton County: Review, analyze, and comment on draft itemization of potentially recoverable litigation costs.	0.50	220.00
05/10/23	Eitan Kagedan	Fulton County: Review and analyze R. Wiygul comments and questions on cost designations.	0.60	180.00
05/10/23	Robert Wiygul	Fulton County: Emails with D. Mavroudis regarding research on recoverability of fee for time spent by government attorneys; continue review and analysis of costs spreadsheet regarding recoverable out-of-pocket costs.	0.40	176.00
05/11/23	Eitan Kagedan	Fulton County: Respond to R. Wiygul comments and questions on cost designations.	0.40	120.00
05/11/23	Eitan Kagedan	Fulton County: Continue drafting Affidavits in support of Fee Petition.	2.50	750.00
05/11/23	Eitan Kagedan	Fulton County: Conference with R. Wiygul to discuss affidavits in support of fee petition, need for additional detail regarding spreadsheet describing costs, client documents supporting request for government-attorney fees, and content of fee application itself.	0.60	180.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/11/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, OGC, and SUDC to discuss status of Fulton County and related matters.	-0.50 0.10	-220.00 44.00*
05/11/23	Robert Wiygul	Fulton County: Conference with E. Kagedan regarding status and contours of timekeeper affidavits in support of application for fees and costs, additional detail regarding out-of-pocket costs incurred, documentation to be provided by clients in support of request for government-attorney fees, and drafting of application for fees itself.	0.60	264.00
05/11/23	Robert Wiygul	Fulton County: Telephone calls and emails with SLI Compliance and Pro V&V regarding potential service as escrow agents.	0.90	396.00
05/12/23	Eitan Kagedan	Fulton County: Continue drafting Affidavits in support of Fee Petition.	2.10	630.00
05/12/23	Robert Wiygul	Fulton County: Emails with K. Kotula regarding status of communications with potential escrow agents and associated issues.	0.40	176.00
05/15/23	Eitan Kagedan	Fulton County: Categorize time entries by specific subject matter for demonstrative exhibits supporting fee petition.	1.30	390.00
05/15/23	Eitan Kagedan	Fulton County: Draft affidavit of R. Macias in support of fee petition.	1.80	540.00
05/15/23	Eitan Kagedan	Fulton County: Email to R. Wiygul and M. Hunter concerning supplementation of detail in affidavits of R. Macias and M. Hangle and status of efforts to contact former Firm employees for execution of affidavits supporting application for fees and costs.	0.20	60.00
05/15/23	Eitan Kagedan	Fulton County: Review file and draft narrative descriptions of research costs for inclusion in spreadsheet itemizing costs.	0.80	240.00
05/16/23	Robert Wiygul	Fulton County: Review and revise worksheet by E. Kagedan allocating time entries to particular categories (e.g., merits briefing of appeal, sanctions proceeding, etc.); review and revise 10 draft affidavits in support of application for fees; communications with E. Kagedan regarding edits to cost details and affidavits.	1.00	440.00

*Where only a portion of time in a single time entry is compensable under the Supreme Court's April 19, 2023 Order, we have identified the compensable portion in red text.

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/16/23	Robert Wiygul	Fulton County: Emails with R. Macias and Pro V&V regarding call to discuss potential escrow agreement.	0.30	132.00
05/17/23	Eitan Kagedan	Fulton County: Review and implement R. Wiygul edits to Affidavits in Support of Fee Petition.	0.70	210.00
05/17/23	Eitan Kagedan	Fulton County: Review file and provide additional detail to descriptions of research and cost entries in support of application for fees and costs.	2.30	690.00
05/17/23	Eitan Kagedan	Fulton County: Review redactions to invoices to attach to application for fees and costs.	0.30	90.00
05/17/23	John Hill	Fulton County: Review and revise draft J. Hill affidavit in support of fee application, including by adding details regarding election-litigation experience.	0.80	200.00
05/17/23	Robert Wiygul	Fulton County: Communications with Pro V&V and SLI Compliance regarding potential service as escrow agent.	0.20	88.00
05/17/23	Robert Wiygul	Fulton County: Telephone call and email with Iron Mountain inquiring into potential service as escrow agent.	0.50	220.00
05/17/23	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding revisions to affidavits and description of research costs in support of fee application; email to D. Mavroudis regarding his firm's supporting affidavit and section of application regarding compensability of time expended by government attorneys.	0.20	88.00
05/18/23	Eitan Kagedan	Fulton County: Develop comprehensive plan for and identify all component parts of fee petition.	0.60	180.00
05/18/23	Eitan Kagedan	Fulton County: Conference with R. Wiygul concerning demonstrative exhibits to fee petitions.	0.40	120.00
05/18/23	Robert Wiygul	Fulton County: Telephone conference with Pro V&V to answer their questions for purposes of obtaining quote for escrow services.	0.20	88.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/18/23	Robert Wiygul	Attend weekly call with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.30 0.10	132.00 44.00
05/18/23	Robert Wiygul	Fulton County: Review quote for escrow services from Pro V&V; email to clients regarding same.	0.40	176.00
05/18/23	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding status and organization of demonstrative exhibits breaking out fees into various categories and structure of exhibits supporting application for award of fees and costs; review and revise affidavit of J. Hill in support of application.	0.60	264.00
05/19/23	Maria Hunter	Fulton County: Review and update spreadsheets itemizing and describing costs and time entries in support of Application for Award of Fees.	1.70	255.00
05/20/23	Robert Wiygul	Fulton County: Email to R. Macias regarding Pro V&V as potential escrow agent.	0.10	44.00
05/21/23	Eitan Kagedan	Fulton County: Review M. Hunter edits to cost and time spreadsheets in support of application for fees.	0.80	240.00
05/21/23	Maria Hunter	Fulton County: Review and update collection of receipts and invoices documenting costs claimed in Fee Petition.	0.60	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/21/23	Robert Wiygul	Fulton County: Review and revise affidavits of R. Macias, M. Aronchick, and M. Hangley in support of application for award of fees and costs.	2.10	924.00
05/22/23	Eitan Kagedan	Fulton County: Review and respond to R. Wiygul comments on descriptions in updated draft of cost spreadsheet.	1.30	390.00
05/22/23	Eitan Kagedan	Fulton County: Prepare for and conduct conference with R. Wiygul and M. Hunter concerning status of components of fee petition and next steps.	1.30	390.00
05/22/23	Eitan Kagedan	Fulton County: Add detail on description of expert costs in spreadsheet supporting fee application.	1.10	330.00
05/22/23	Eitan Kagedan	Fulton County: Add detail regarding time spent to Affidavit of R. Macias.	1.20	360.00
05/22/23	Maria Hunter	Fulton County: Confer with R. Wiygul and E. Kagedan regarding spreadsheets of costs and time entries in support of Petition for Fees.	0.80	120.00
05/22/23	Maria Hunter	Fulton County: Review and update Chart of Costs and time entries in support of Petition for Fees.	1.80	270.00
05/22/23	Robert Wiygul	Fulton County: Zoom conference with E. Kagedan and (for part of time) M. Hunter regarding revisions and addition of detail to costs spreadsheet in support of application for fees and costs and revision and supplementation of draft affidavit by R. Macias in support of application for fees and costs.	1.10	484.00
05/22/23	Robert Wiygul	Fulton County: Draft and revise letter to Petitioners' counsel proposing Pro V&V as escrow agent; email to clients regarding same.	1.10	484.00
05/23/23	Eitan Kagedan	Fulton County: Analyze detailed research and expert-related cost documentation to provide additional detail concerning entries on cost spreadsheet supporting application for fees and costs.	3.10	930.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/23/23	Maria Hunter	Fulton County: Review and update spreadsheets of Fees and Costs for inclusion in Fee Petition.	4.70	705.00
05/23/23	Maria Hunter	Fulton County: Review proposed redactions to documentation of legal research costs for inclusion in Fee Petition.	0.20	30.00
05/23/23	Maria Hunter	Fulton County: Communications with accounting department regarding payment of certain costs for inclusion in Fee Application.	0.70	105.00
05/23/23	Maria Hunter	Fulton County: Review and redact documentation of legal research costs for inclusion in Fee Application.	1.90	285.00
05/23/23	Robert Wiygul	Fulton County: Finalize and send letter to Petitioners' counsel proposing escrow agent.	0.20	88.00
05/24/23	Eitan Kagedan	Fulton County: Gather and review information in support of additional detail on expert costs, and update cost spreadsheet and affidavit of R. Macias accordingly.	1.40	420.00
05/24/23	Eitan Kagedan	Fulton County: Review redactions to invoices and other documentation of costs in support of application for fees and costs.	0.30	90.00
05/24/23	Robert Wiygul	Fulton County: Draft application for award of fees and costs; research case law in support.	6.50	2,860.00
05/25/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.50 0.10	220.00 44.00
05/25/23	Robert Wiygul	Fulton County: Finish initial draft of application for fees and costs; research case law in support.	8.40	3,696.00
05/26/23	Maria Hunter	Fulton County: Review of R. Wiygul's Affidavit in Support of Application for Award of Fees.	0.20	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/26/23	Maria Hunter	Fulton County: Continued review and update spreadsheet of fees and costs in support of Application for Award of Fees and Costs.	2.40	360.00
05/26/23	Maria Hunter	Fulton County: Review of draft Affidavits of K. Mullen, K. Kotula and J. Boyer in Support of Application for Award of Fees.	0.30	45.00
05/26/23	Maria Hunter	Fulton County: Communications with A. Arteaga regarding Affidavit in Support of Application for Award of Fees.	0.10	15.00
05/26/23	Robert Wiygul	Fulton County: Revise application for fees and costs and Wiygul Affidavit in support of application.	1.20	528.00
05/26/23	Robert Wiygul	Fulton County: Telephone conference with M. Hunter regarding finalization of application for fees and costs, organization of all exhibits, and content of demonstrative exhibits.	0.50	220.00
05/26/23	Robert Wiygul	Fulton County: Revise and supplement R. Macias affidavit in support of application for fees and costs.	1.70	748.00
05/26/23	Robert Wiygul	Fulton County: Revise affidavits of Mark Aronchick, Michele Hangley, John Hill, Kim Ferrari, and Alex Arteaga in support of fee application and email affiants regarding same; draft affidavit of D. Brier in support of fee application; categorize K. Kotula and K. Mullen time entries for incorporation into demonstrative spreadsheets.	2.50	1,100.00
05/26/23	Robert Wiygul	Fulton County: Email to clients attaching draft application for fees and costs and Wiygul affidavit; emails with clients regarding draft affidavits from Commonwealth attorneys; review and revise draft affidavits from J. Boyer, K. Mullen, and K. Kotula; email to Petitioners' counsel following up on letter regarding escrow agent.	1.60	704.00
05/26/23	Robert Wiygul	Fulton County: Email to Petitioners' counsel following up on request for position on proposed escrow agent.	0.10	44.00
05/27/23	Maria Hunter	Fulton County: Review and update redactions to personal information contained in Hangley Aronchick costs documentations.	2.50	375.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/27/23	Maria Hunter	Fulton County: Review and update spreadsheet of fees and costs.	1.20	180.00
05/27/23	Robert Wiygul	Fulton County: Revise R. Macias and D. Mavroudis affidavits in support of application for fees and costs; email R. Macias and D. Mavroudis regarding same.	1.10	484.00
05/27/23	Robert Wiygul	Fulton County: Review K. Mullen's comments on draft application for fees and costs and revise and supplement same.	0.90	396.00
05/28/23	Mark A. Aronchick	Fulton County: Reviewing and revising draft Affidavit in support of fee application and supplementing with details of experience.	0.50	220.00
05/28/23	Maria Hunter	Fulton County: Review and update redactions to personal information contained in Macias invoices and back-up.	1.30	195.00
05/28/23	Maria Hunter	Fulton County: Review and update spreadsheet of fees and costs regarding Application for award of Fees and Costs.	1.40	210.00
05/28/23	Maria Hunter	Fulton County: Review and correct citations to and quotations from case law and pleadings relied upon in Application for Award of Fees and Costs.	3.40	510.00
05/29/23	Maria Hunter	Fulton County: Communications with A. Arteaga regarding Affidavit in Support of Application for Award of Fees and Costs.	0.10	15.00
05/29/23	Maria Hunter	Fulton County: Review and update spreadsheets of time entries and costs for use in support of Application for Award of Fees and Costs.	2.40	360.00
05/29/23	Maria Hunter	Fulton County: Review and update K. Mullen and K. Kotula exhibits relating to time entries in support of Application for Award of Fees and Costs.	0.70	105.00
05/29/23	Robert Wiygul	Fulton County: Revise and supplement application for fees to include additional authorities and to address basis for sanctioning Commissioners Ulsh and Bunch in their individual capacities.	1.00	440.00
05/30/23	Eitan Kagedan	Fulton County: Review and revise status report on escrow discussions.	0.40	120.00
05/30/23	Eitan Kagedan	Fulton County: Review Dominion fee petition.	0.20	60.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/30/23	Eitan Kagedan	Fulton County: Review correspondence from petitioners' counsel concerning escrow agreement.	0.20	60.00
05/30/23	Eitan Kagedan	Fulton County: Conduct comprehensive review of fee petition and supporting materials, resolving issues and conducting reconciliation where needed.	3.70	1,110.00
05/30/23	Mark A. Aronchick	Fulton County: Finalizing Affidavit.	0.30	132.00
05/30/23	Maria Hunter	Fulton County: Continued review and update of spreadsheets of Fees and Costs in support of Application for Award of Fees and Costs.	2.90	435.00
05/30/23	Maria Hunter	Fulton County: Review and update documentation of costs, for use as exhibit to R. Wiygul's Affidavit in support of Application for Award of Fees and Costs.	1.10	165.00
05/30/23	Maria Hunter	Fulton County: Review and finalize M. Hunter Affidavit in support of Application for Award of Fees and Costs.	0.20	30.00
05/30/23	Maria Hunter	Fulton County: Review and finalize E. Kagedan's Affidavit in support of Application for Award of Fees and Costs.	0.30	45.00
05/30/23	Maria Hunter	Fulton County: Review, update, finalize, and file Application for Award of Fees and Costs.	1.10	165.00
05/30/23	Maria Hunter	Fulton County: Various communications with A. Arteaga regarding Affidavit, and update and finalize A. Arteaga's Affidavit in support of Application for Award of Fees and Costs.	0.50	75.00
05/30/23	Maria Hunter	Fulton County: Review and finalize R. Wiygul's Affidavit and all exhibits thereto in support of Application for Award of Fees and Costs.	2.60	390.00
05/30/23	Maria Hunter	Fulton County: Review, update, finalize and submit Joint Status Report.	0.40	60.00
05/30/23	Maria Hunter	Fulton County: Update Commonwealth-Attorney Affidavits and exhibits in support of Application for Award of Fees and Costs.	1.00	150.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/30/23	Robert Wiygul	Fulton County: Review email and letter from Petitioners' counsel in response to proposal regarding escrow agent; emails to clients and R. Macias regarding same; conduct preliminary research into "Auld & Associates Investigations" entity proposed by Petitioners.	0.90	396.00
05/30/23	Robert Wiygul	Fulton County: Revise and finalize application for fees and all supporting affidavits and exhibits; communications with team, clients, D. Mavroudis, D. Brier, and other affiants regarding same.	4.30	1,892.00
05/30/23	Robert Wiygul	Fulton County: Draft joint status report addressing parties' discussions regarding appointment of escrow agent; emails to M. Hunter and E. Kagedan regarding same; emails with clients and counsel for Petitioners and Dominion regarding same; revise and finalize joint status report.	2.30	1,012.00
05/31/23	Eitan Kagedan	Fulton County: Conference with R. Macias and R. Wiygul to discuss escrow-agent issues.	0.60	180.00
05/31/23	Robert Wiygul	Fulton County: Videoconference with R. Macias regarding T. Carroll's letter commenting on Pro V&V and suggesting Auld & Associates as escrow agent.	0.60	264.00
05/31/23	Robert Wiygul	Fulton County: Draft letter to Commonwealth Court enclosing copies of fee application and joint status report and arrange for transmittal.	0.10	44.00

EXHIBIT B

County of Fulton et al. v. Secretary of the Commonwealth,
No. 3 MAP 2022; Commonwealth Court Docket No. 277 M.D. 2021

Exhibit B - Supplemental Expenditures of Legal-Professional Time

Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
05/01/23	Kagedan, Eitan	Fulton County: Communicate with R. Macias concerning provisions of court orders addressing impoundment of voting machines.	0.4	120.00
05/01/23	Kagedan, Eitan	Fulton County: Review and respond to correspondence with clients (Department of State, OGC, and OAG) to set agenda and time for conference concerning strategy for identification of potential escrow agent.	0.3	90.00
05/02/23	Kagedan, Eitan	Fulton County: Confer with M. Hunter concerning fee issues in preparation for assembling application for award of fees and costs.	0.2	60.00
05/02/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning escrow and fee issues in preparation for identifying potential escrow agents and assembling application for award of fees and costs.	0.8	240.00
05/02/23	Kagedan, Eitan	Fulton County: Confer with clients concerning escrow and fee issues.	0.4	120.00
05/02/23	Hunter, Maria	Fulton County: Review chart of time entries in preparation for assembling documentation in support of application for award of fees and costs.	0.6	90.00
05/02/23	Wiygul, Robert	Fulton County: Review file regarding specific election equipment subject to impoundment order and research potential escrow agents; videoconference with clients regarding escrow-agent issues and candidates and preparation of fee petition; telephone conference with E. Kagedan regarding next steps in analyzing firm invoices and preparing fee petition.	1.5	660.00
05/02/23	Wiygul, Robert	Fulton County: Review and annotate Pa. Supreme Court decision in preparation for drafting application for fees; research case law regarding propriety of "fees on fees" in support of application.	0.5	220.00
05/03/23	Kagedan, Eitan	Fulton County: Review and analyze firm invoices from December 2021 to present to identify compensable time for purposes of application for fees and costs.	3.5	1,050.00
05/03/23	Kagedan, Eitan	Fulton County: Prepare for and conduct conference with R. Wiygul and R. Macias to discuss (1) expert views on potential escrow agent and terms of escrow agreement and (2) obtaining additional detail on expert fees in support of application for award of fees and costs.	1	300.00
05/03/23	Hunter, Maria	Fulton County: Review and update draft spreadsheets itemizing time entries and costs in advance of filing Motion for Fees.	1.3	195.00
05/03/23	Wiygul, Robert	Fulton County: Videoconference with R. Macias seeking (1) input regarding potential escrow agent and terms of escrow agreement and (2) additional detail on expert fees in support of application for award of litigation fees and costs.	0.5	220.00

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/04/23	Hunter, Maria	Fulton County: Review additional invoices and receipts and update spreadsheet itemizing and describing costs to be included in application for fees and costs.	1.4	210.00
05/04/23	Wiygul, Robert	Fulton County: Telephone conference with clients and OGC to discuss status of Fulton County proceedings and accounting in fee petition for time spent by government attorneys.	0.5	220.00
05/04/23	Wiygul, Robert	Fulton County: Email and telephone call to D. Mavroudis regarding affidavit from him in support of fee petition and research regarding compensability of time spent by government attorneys.	0.3	132.00
05/04/23	Wiygul, Robert	Fulton County: Review E. Kagedan's mark up of invoices from December 2021 through March 2023 and revise and supplement annotations regarding time entries that should be included in application for fees.	1.8	792.00
05/04/23	Mavroudis, Dimitri	Conference call with Rob Wiygul regarding strategy for fee petition and supporting affidavits.	0.3	132.00
05/04/23	Mavroudis, Dimitri	Review sample affidavits.	0.4	176.00
05/05/23	Kagedan, Eitan	Fulton County: Call with R. Wiygul concerning components of application for fees and costs and identification of supporting affidavits.	0.3	90.00
05/05/23	Kagedan, Eitan	Fulton County: Prepare for and conduct conference with counsel for Dominion concerning escrow arrangement.	0.4	120.00
05/05/23	Kagedan, Eitan	Fulton County: Review R. Wiygul's suggested revisions to segregation of fees, compare time entries with categories of activities and offer further suggested revisions as appropriate.	1.4	420.00
05/05/23	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding next steps in review and mark up of invoices and drafting of timekeeper affidavits in support of application for fees.	0.2	88.00
05/05/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding prospective escrow agents; email to clients regarding same.	0.4	176.00
05/08/23	Kagedan, Eitan	Fulton County: Review detailed backup and breakdown of costs on firm invoices to client and review time entries, contemporaneous emails, and related documentation to determine whether and to what extent each itemized cost is subject to reimbursement pursuant to the Supreme Court's sanctions order.	1.9	570.00
05/09/23	Kagedan, Eitan	Fulton County: Continue review of detailed backup and breakdown of costs on firm invoices to client and review time entries, contemporaneous emails, and related documentation to determine whether and to what extent each itemized cost is subject to reimbursement pursuant to the Supreme Court's sanctions order.	1	300.00

County of Fulton et al. v. Secretary of the Commonwealth,
No. 3 MAP 2022; Commonwealth Court Docket No. 277 M.D. 2021

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/09/23	Kagedan, Eitan	Fulton County: Identify individuals for whom affidavits need to be submitted in support of application for fees and costs and develop plan to draft affidavits and obtain signatures from affiants.	0.5	150.00
05/09/23	Kagedan, Eitan	Fulton County: Begin drafting Affidavits in Support of Fee Petition.	0.4	120.00
05/09/23	Wiygul, Robert	Fulton County: Research caselaw regarding compensability of computerized legal research fees as part of award of attorneys' fees and litigation costs.	0.4	176.00
05/09/23	Wiygul, Robert	Fulton County: Review, analyze, and comment on draft itemization of potentially recoverable litigation costs.	0.5	220.00
05/10/23	Kagedan, Eitan	Fulton County: Review and analyze R. Wiygul comments and questions on cost designations.	0.6	180.00
05/10/23	Wiygul, Robert	Fulton County: Emails with D. Mavroudis regarding research on recoverability of fee for time spent by government attorneys; continue review and analysis of costs spreadsheet regarding recoverable out-of-pocket costs.	0.4	176.00
05/11/23	Kagedan, Eitan	Fulton County: Respond to R. Wiygul comments and questions on cost designations.	0.4	120.00
05/11/23	Kagedan, Eitan	Fulton County: Continue drafting Affidavits in support of Fee Petition.	2.5	750.00
05/11/23	Kagedan, Eitan	Fulton County: Conference with R. Wiygul to discuss affidavits in support of fee petition, need for additional detail regarding spreadsheet describing costs, client documents supporting request for government-attorney fees, and content of fee application itself.	0.6	180.00
05/11/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, OGC, and SUDC to discuss status of Fulton County and related matters.	0.1	44.00
05/11/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding status and contours of timekeeper affidavits in support of application for fees and costs, additional detail regarding out-of-pocket costs incurred, documentation to be provided by clients in support of request for government-attorney fees, and drafting of application for fees itself.	0.6	264.00
05/11/23	Wiygul, Robert	Fulton County: Telephone calls and emails with SLI Compliance and Pro V&V regarding potential service as escrow agents.	0.9	396.00
05/11/23	Mavroudis, Dimitri	Conduct legal research regarding whether attorneys' fees are recoverable for work performed by a government attorney in Pennsylvania.	1.2	528.00
05/11/23	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding legal research on whether attorneys' fees are recoverable for work performed by a government attorney in Pennsylvania.	0.3	132.00
05/12/23	Kagedan, Eitan	Fulton County: Continue drafting Affidavits in support of Fee Petition.	2.1	630.00

County of Fulton et al. v. Secretary of the Commonwealth,
No. 3 MAP 2022; Commonwealth Court Docket No. 277 M.D. 2021

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/12/23	Wiygul, Robert	Fulton County: Emails with K. Kotula regarding status of communications with potential escrow agents and associated issues.	0.4	176.00
05/15/23	Kagedan, Eitan	Fulton County: Categorize time entries by specific subject matter for demonstrative exhibits supporting fee petition.	1.3	390.00
05/15/23	Kagedan, Eitan	Fulton County: Draft affidavit of R. Macias in support of fee petition.	1.8	540.00
05/15/23	Kagedan, Eitan	Fulton County: Email to R. Wiygul and M. Hunter concerning supplementation of detail in affidavits of R. Macias and M. Hangley and status of efforts to contact former Firm employees for execution of affidavits supporting application for fees and costs.	0.2	60.00
05/15/23	Kagedan, Eitan	Fulton County: Review file and draft narrative descriptions of research costs for inclusion in spreadsheet itemizing costs.	0.8	240.00
05/16/23	Wiygul, Robert	Fulton County: Review and revise worksheet by E. Kagedan allocating time entries to particular categories (e.g., merits briefing of appeal, sanctions proceeding, etc.); review and revise 10 draft affidavits in support of application for fees; communications with E. Kagedan regarding edits to cost details and affidavits.	1	440.00
05/16/23	Wiygul, Robert	Fulton County: Emails with R. Macias and Pro V&V regarding call to discuss potential escrow agreement.	0.3	132.00
05/17/23	Kagedan, Eitan	Fulton County: Review and implement R. Wiygul edits to Affidavits in Support of Fee Petition.	0.7	210.00
05/17/23	Kagedan, Eitan	Fulton County: Review file and provide additional detail to descriptions of research and cost entries in support of application for fees and costs.	2.3	690.00
05/17/23	Kagedan, Eitan	Fulton County: Review redactions to invoices to attach to application for fees and costs.	0.3	90.00
05/17/23	Hill, John	Fulton County: Review and revise draft J. Hill affidavit in support of fee application, including by adding details regarding election-litigation experience.	0.8	200.00
05/17/23	Wiygul, Robert	Fulton County: Communications with Pro V&V and SLI Compliance regarding potential service as escrow agent.	0.2	88.00
05/17/23	Wiygul, Robert	Fulton County: Telephone call and email with Iron Mountain inquiring into potential service as escrow agent.	0.5	220.00
05/17/23	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding revisions to affidavits and description of research costs in support of fee application; email to D. Mavroudis regarding his firm's supporting affidavit and section of application regarding compensability of time expended by government attorneys.	0.2	88.00
05/18/23	Kagedan, Eitan	Fulton County: Develop comprehensive plan for and identify all component parts of fee petition.	0.6	180.00

County of Fulton et al. v. Secretary of the Commonwealth,
No. 3 MAP 2022; Commonwealth Court Docket No. 277 M.D. 2021

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/18/23	Kagedan, Eitan	Fulton County: Conference with R. Wiygul concerning demonstrative exhibits to fee petitions.	0.4	120.00
05/18/23	Wiygul, Robert	Fulton County: Telephone conference with Pro V&V to answer their questions for purposes of obtaining quote for escrow services.	0.2	88.00
05/18/23	Wiygul, Robert	Attend weekly call with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
05/18/23	Wiygul, Robert	Fulton County: Review quote for escrow services from Pro V&V; email to clients regarding same.	0.4	176.00
05/18/23	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding status and organization of demonstrative exhibits breaking out fees into various categories and structure of exhibits supporting application for award of fees and costs; review and revise affidavit of J. Hill in support of application.	0.6	264.00
05/19/23	Hunter, Maria	Fulton County: Review and update spreadsheets itemizing and describing costs and time entries in support of Application for Award of Fees.	1.7	255.00
05/20/23	Wiygul, Robert	Fulton County: Email to R. Macias regarding Pro V&V as potential escrow agent.	0.1	44.00
05/21/23	Kagedan, Eitan	Fulton County: Review M. Hunter edits to cost and time spreadsheets in support of application for fees.	0.8	240.00
05/21/23	Hunter, Maria	Fulton County: Review and update collection of receipts and invoices documenting costs claimed in Fee Petition.	0.6	90.00
05/21/23	Wiygul, Robert	Fulton County: Review and revise affidavits of R. Macias, M. Aronchick, and M. Hangle in support of application for award of fees and costs.	2.1	924.00
05/22/23	Kagedan, Eitan	Fulton County: Review and respond to R. Wiygul comments on descriptions in updated draft of cost spreadsheet.	1.3	390.00
05/22/23	Kagedan, Eitan	Fulton County: Prepare for and conduct conference with R. Wiygul and M. Hunter concerning status of components of fee petition and next steps.	1.3	390.00
05/22/23	Kagedan, Eitan	Fulton County: Add detail on description of expert costs in spreadsheet supporting fee application.	1.1	330.00
05/22/23	Kagedan, Eitan	Fulton County: Add detail regarding time spent to Affidavit of R. Macias.	1.2	360.00
05/22/23	Hunter, Maria	Fulton County: Confer with R. Wiygul and E. Kagedan regarding spreadsheets of costs and time entries in support of Petition for Fees.	0.8	120.00
05/22/23	Hunter, Maria	Fulton County: Review and update Chart of Costs and time entries in support of Petition for Fees.	1.8	270.00
05/22/23	Wiygul, Robert	Fulton County: Zoom conference with E. Kagedan and (for part of time) M. Hunter regarding revisions and addition of detail to costs spreadsheet in support of application for fees and costs and revision and supplementation of draft affidavit by R. Macias in support of application for fees and costs.	1.1	484.00

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/22/23	Wiygul, Robert	Fulton County: Draft and revise letter to Petitioners' counsel proposing Pro V&V as escrow agent; email to clients regarding same.	1.1	484.00
05/22/23	Mavroudis, Dimitri	Draft affidavit on behalf of TLG in support of fee petition.	0.8	352.00
05/22/23	Mavroudis, Dimitri	Review Tucker Law Group bills for inclusion with affidavit.	0.1	44.00
05/23/23	Kagedan, Eitan	Fulton County: Analyze detailed research and expert-related cost documentation to provide additional detail concerning entries on cost spreadsheet supporting application for fees and costs.	3.1	930.00
05/23/23	Hunter, Maria	Fulton County: Review and update spreadsheets of Fees and Costs for inclusion in Fee Petition.	4.7	705.00
05/23/23	Hunter, Maria	Fulton County: Review proposed redactions to documentation of legal research costs for inclusion in Fee Petition.	0.2	30.00
05/23/23	Hunter, Maria	Fulton County: Communications with accounting department regarding payment of certain costs for inclusion in Fee Application.	0.7	105.00
05/23/23	Hunter, Maria	Fulton County: Review and redact documentation of legal research costs for inclusion in Fee Application.	1.9	285.00
05/23/23	Wiygul, Robert	Fulton County: Finalize and send letter to Petitioners' counsel proposing escrow agent.	0.2	88.00
05/24/23	Kagedan, Eitan	Fulton County: Gather and review information in support of additional detail on expert costs, and update cost spreadsheet and affidavit of R. Macias accordingly.	1.4	420.00
05/24/23	Kagedan, Eitan	Fulton County: Review redactions to invoices and other documentation of costs in support of application for fees and costs.	0.3	90.00
05/24/23	Wiygul, Robert	Fulton County: Draft application for award of fees and costs; research case law in support.	6.5	2,860.00
05/25/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
05/25/23	Wiygul, Robert	Fulton County: Finish initial draft of application for fees and costs; research case law in support.	8.4	3,696.00
05/26/23	Hunter, Maria	Fulton County: Review of R. Wiygul's Affidavit in Support of Application for Award of Fees.	0.2	30.00
05/26/23	Hunter, Maria	Fulton County: Continued review and update spreadsheet of fees and costs in support of Application for Award of Fees and Costs.	2.4	360.00
05/26/23	Hunter, Maria	Fulton County: Review of draft Affidavits of K. Mullen, K. Kotula and J. Boyer in Support of Application for Award of Fees.	0.3	45.00
05/26/23	Hunter, Maria	Fulton County: Communications with A. Arteaga regarding Affidavit in Support of Application for Award of Fees.	0.1	15.00
05/26/23	Wiygul, Robert	Fulton County: Revise application for fees and costs and Wiygul Affidavit in support of application.	1.2	528.00

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/26/23	Wiygul, Robert	Fulton County: Telephone conference with M. Hunter regarding finalization of application for fees and costs, organization of all exhibits, and content of demonstrative exhibits.	0.5	220.00
05/26/23	Wiygul, Robert	Fulton County: Revise and supplement R. Macias affidavit in support of application for fees and costs.	1.7	748.00
05/26/23	Wiygul, Robert	Fulton County: Revise affidavits of Mark Aronchick, Michele Hangle, John Hill, Kim Ferrari, and Alex Arteaga in support of fee application and email affiants regarding same; draft affidavit of D. Brier in support of fee application; categorize K. Kotula and K. Mullen time entries for incorporation into demonstrative spreadsheets.	2.5	1,100.00
05/26/23	Wiygul, Robert	Fulton County: Email to clients attaching draft application for fees and costs and Wiygul affidavit; emails with clients regarding draft affidavits from Commonwealth attorneys; review and revise draft affidavits from J. Boyer, K. Mullen, and K. Kotula; email to Petitioners' counsel following up on letter regarding escrow agent.	1.6	704.00
05/26/23	Wiygul, Robert	Fulton County: Email to Petitioners' counsel following up on request for position on proposed escrow agent.	0.1	44.00
05/27/23	Hunter, Maria	Fulton County: Review and update redactions to personal information contained in Hangle Aronchick costs documentations.	2.5	375.00
05/27/23	Hunter, Maria	Fulton County: Review and update spreadsheet of fees and costs.	1.2	180.00
05/27/23	Wiygul, Robert	Fulton County: Revise R. Macias and D. Mavroudis affidavits in support of application for fees and costs; email R. Macias and D. Mavroudis regarding same.	1.1	484.00
05/27/23	Wiygul, Robert	Fulton County: Review K. Mullen's comments on draft application for fees and costs and revise and supplement same.	0.9	396.00
05/28/23	Aronchick, Mark A.	Fulton County: Reviewing and revising draft Affidavit in support of fee application and supplementing with details of experience.	0.5	220.00
05/28/23	Hunter, Maria	Fulton County: Review and update redactions to personal information contained in Macias invoices and back-up.	1.3	195.00
05/28/23	Hunter, Maria	Fulton County: Review and update spreadsheet of fees and costs regarding Application for award of Fees and Costs.	1.4	210.00
05/28/23	Hunter, Maria	Fulton County: Review and correct citations to and quotations from case law and pleadings relied upon in Application for Award of Fees and Costs.	3.4	510.00
05/29/23	Hunter, Maria	Fulton County: Communications with A. Arteaga regarding Affidavit in Support of Application for Award of Fees and Costs.	0.1	15.00
05/29/23	Hunter, Maria	Fulton County: Review and update spreadsheets of time entries and costs for use in support of Application for Award of Fees and Costs.	2.4	360.00
05/29/23	Hunter, Maria	Fulton County: Review and update K. Mullen and K. Kotula exhibits relating to time entries in support of Application for Award of Fees and Costs.	0.7	105.00

County of Fulton et al. v. Secretary of the Commonwealth,
No. 3 MAP 2022; Commonwealth Court Docket No. 277 M.D. 2021

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/29/23	Wiygul, Robert	Fulton County: Revise and supplement application for fees to include additional authorities and to address basis for sanctioning Commissioners Ulsh and Bunch in their individual capacities.	1	440.00
05/30/23	Kagedan, Eitan	Fulton County: Review and revise status report on escrow discussions.	0.4	120.00
05/30/23	Kagedan, Eitan	Fulton County: Review Dominion fee petition.	0.2	60.00
05/30/23	Kagedan, Eitan	Fulton County: Review correspondence from petitioners' counsel concerning escrow agreement.	0.2	60.00
05/30/23	Kagedan, Eitan	Fulton County: Conduct comprehensive review of fee petition and supporting materials, resolving issues and conducting reconciliation where needed.	3.7	1,110.00
05/30/23	Aronchick, Mark A.	Fulton County: Finalizing Affidavit.	0.3	132.00
05/30/23	Hunter, Maria	Fulton County: Continued review and update of spreadsheets of Fees and Costs in support of Application for Award of Fees and Costs.	2.9	435.00
05/30/23	Hunter, Maria	Fulton County: Review and update documentation of costs, for use as exhibit to R. Wiygul's Affidavit in support of Application for Award of Fees and Costs.	1.1	165.00
05/30/23	Hunter, Maria	Fulton County: Review and finalize M. Hunter Affidavit in support of Application for Award of Fees and Costs.	0.2	30.00
05/30/23	Hunter, Maria	Fulton County: Review and finalize E. Kagedan's Affidavit in support of Application for Award of Fees and Costs.	0.3	45.00
05/30/23	Hunter, Maria	Fulton County: Review, update, finalize, and file Application for Award of Fees and Costs.	1.1	165.00
05/30/23	Hunter, Maria	Fulton County: Various communications with A. Arteaga regarding Affidavit, and update and finalize A. Arteaga's Affidavit in support of Application for Award of Fees and Costs.	0.5	75.00
05/30/23	Hunter, Maria	Fulton County: Review and finalize R. Wiygul's Affidavit and all exhibits thereto in support of Application for Award of Fees and Costs.	2.6	390.00
05/30/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Joint Status Report.	0.4	60.00
05/30/23	Hunter, Maria	Fulton County: Update Commonwealth-Attorney Affidavits and exhibits in support of Application for Award of Fees and Costs.	1	150.00
05/30/23	Wiygul, Robert	Fulton County: Review email and letter from Petitioners' counsel in response to proposal regarding escrow agent; emails to clients and R. Macias regarding same; conduct preliminary research into "Auld & Associates Investigations" entity proposed by Petitioners.	0.9	396.00
05/30/23	Wiygul, Robert	Fulton County: Revise and finalize application for fees and all supporting affidavits and exhibits; communications with team, clients, D. Mavroudis, D. Brier, and other affiants regarding same.	4.3	1,892.00
05/30/23	Wiygul, Robert	Fulton County: Draft joint status report addressing parties' discussions regarding appointment of escrow agent; emails to M. Hunter and E. Kagedan regarding same; emails with clients and counsel for Petitioners and Dominion regarding same; revise and finalize joint status report.	2.3	1,012.00

County of Fulton et al. v. Secretary of the Commonwealth,
No. 3 MAP 2022; Commonwealth Court Docket No. 277 M.D. 2021

Exhibit B - Supplemental Expenditures of Legal-Professional Time

05/30/23	Mavroudis, Dimitri	Revise affidavit on behalf of TLG in support of fee petition pursuant to R. Wiygul comments	0.2	88.00
05/31/23	Kagedan, Eitan	Fulton County: Conference with R. Macias and R. Wiygul to discuss escrow-agent issues.	0.6	180.00
05/31/23	Wiygul, Robert	Fulton County: Videoconference with R. Macias regarding T. Carroll's letter commenting on Pro V&V and suggesting Auld & Associates as escrow agent.	0.6	264.00
05/31/23	Wiygul, Robert	Fulton County: Draft letter to Commonwealth Court enclosing copies of fee application and joint status report and arrange for transmittal.	0.1	44.00
Totals			140.3	\$ 43,480.0

Exhibit B - Supplemental Expenditures of Legal-Professional Time

Time Keeper	Hours	Amount
Aronchick, Mark A.	0.80	\$ 352.00
Wiygul, Robert	50.90	\$ 22,396.00
Hill, John	0.80	\$ 200.00
Kagedan, Eitan	42.70	\$ 12,810.00
Mavroudis, Dimitri	3.30	\$ 1,452.00
Hunter, Maria	41.80	\$ 6,270.00

EXHIBIT C

Exhibit C - Itemization and Description of Supplemental Litigation Costs

Date/Period	Description	Detail	Item Amount	Backup Exhibit No.
5/24 - 5/25/23	Legal Research	Research case law in support of supplemental application for award of fees and costs	933.55	Exhibit C_001 Macias Ex. 1
5/3 - 5/31/23	Outside Professional Services - Expert	Expert time preparing affidavit in support of application for award of fees and costs and advising counsel regarding potential escrow agents and escrow services	625.00	Exhibit C_002

Total	\$	1,558.55
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Legal Research	\$	933.55
Outside Professional Services - Expert	\$	625.00

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA [REDACTED]
Date Range: May 01, 2023 - May 31, 2023
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]								
Client 28000-050								
Day 05/18/2023								
[REDACTED]		1						
[REDACTED]		1						
Day 05/24/2023								
Totals for Included		21			1,032.00 USD	206.40 USD	16.51 USD	222.91 USD
Totals for Day 05/24/2023		21			1,032.00 USD	206.40 USD	16.51 USD	222.91 USD
Day 05/25/2023								
Totals for Included		79			3,290.00 USD	658.00 USD	52.64 USD	710.64 USD
Totals for Day 05/25/2023		79			3,290.00 USD	658.00 USD	52.64 USD	710.64 USD
Totals for Client 28000-050								
Totals for Account: [REDACTED]								

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: **Pennsylvania Election
Reviews**

RSM Election Solutions LLC



INVOICE #: 2023_May
DATE: May 31, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

**THANK YOU FOR
YOUR BUSINESS!**

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
2.5	Hours	Consulting hours worked on Pennsylvania Election Reviews (escrow of voting equipment and affidavit in support of the Secretary's application for fees)	\$250	\$625.00

Total \$625.00

**SPECIAL MASTER'S
EXHIBIT B PART II**

AMENDED EXHIBIT C

Exhibit C - Itemization and Description of Supplemental Litigation Costs

Date/Period	Description	Detail	Item Amount	Backup Exhibit No.
5/24 - 5/25/23	Legal Research	Research case law in support of application for award of fees and costs	933.55	Exhibit C_001 Macias Ex. 1
5/3 - 5/31/23	Outside Professional Services - Expert	Expert time preparing affidavit in support of application for award of fees and costs and advising counsel regarding potential escrow agents and escrow services	625.00	Exhibit C_002

Total	\$	1,558.55
-------	----	----------

Legal Research	\$	933.55
Outside Professional Services - Expert	\$	625.00

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA [REDACTED]
Date Range: May 01, 2023 - May 31, 2023
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]								
Client 28000-050								
Day 05/18/2023								
[REDACTED]		1						
[REDACTED]		1						
Day 05/24/2023								
Totals for Included		21			1,032.00 USD	206.40 USD	16.51 USD	222.91 USD
Totals for Day 05/24/2023		21			1,032.00 USD	206.40 USD	16.51 USD	222.91 USD
Day 05/25/2023								
Totals for Included		79			3,290.00 USD	658.00 USD	52.64 USD	710.64 USD
Totals for Day 05/25/2023		79			3,290.00 USD	658.00 USD	52.64 USD	710.64 USD
Totals for Client 28000-050								
Totals for Account: [REDACTED]								

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: **Pennsylvania Election
Reviews**

RSM Election Solutions LLC



INVOICE #: 2023_May
DATE: May 31, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

**THANK YOU FOR
YOUR BUSINESS!**

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
2.5	Hours	Consulting hours worked on Pennsylvania Election Reviews (escrow of voting equipment and affidavit in support of the Secretary's application for fees)	\$250	\$625.00

Total \$625.00

SPECIAL
MASTER'S
EXHIBIT C

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
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GOVERNOR'S OFFICE OF GENERAL
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(717) 783-1657

OFFICE OF ATTORNEY GENERAL
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Harrisburg, PA 17120
(717) 787-2717

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, *et al.*,

Petitioners/Appellees,

v.

SECRETARY OF THE COMMONWEALTH,

Respondent/Appellant.

No. 277 MD 2021
No. 3 MAP 2022

AFFIDAVIT OF ROBERT A. WIYGUL

I, Robert A. Wiygul, hereby state and affirm the following:

1. I am a shareholder in the law firm of Hangley Aronchick Segal Pudlin & Schiller (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Respondent/Appellant the Secretary of the Commonwealth (the “Secretary”) in the above-captioned action.

2. I submit this Affidavit in support of the Second Secretary’s Second Supplemental Application for an Award of Fees and Costs (the “Second Supplemental Application”). The facts set forth herein are based on my personal knowledge and the Firm’s billing records.

3. I previously submitted an affidavit dated May 30, 2023, in support of the Secretary’s Application for an Award of Fees and Costs Pursuant to the Special Master’s Order dated April 28, 2023 (the “Initial Application”), which affidavit I incorporate herein by reference.

4. I also previously submitted an affidavit dated June 9, 2023, in support of the Secretary’s Supplemental Application for an Award of Fees and Costs Pursuant to the Special Master’s Order Dated June 2, 2023 (the “First Supplemental Application”).

5. Below is a chart of the paralegals who presently work at the Firm and billed time for which the Secretary seeks reimbursement, but did not bill time for which the Secretary sought reimbursement in the Initial Application or First

Supplemental Application. The chart shows the hourly rate the paralegal has charged the Secretary pursuant to the Firm's legal-services contract with the Commonwealth:

Name	Position at the Firm	Hourly Rate Charged to the Secretary and for Which Reimbursement is Sought
Christine Pratt	Paralegal	\$150
Kristine Bompadre	Paralegal	\$150

6. The Firm's billing records attached as Exhibit A hereto were made at or near the time of the events they record by, or from information transmitted from, persons with knowledge of the events; were kept in the course of the Firm's regularly conducted activity; and were made as part of the Firm's regular practice.

7. The specific work performed by the Firm for which the Secretary seeks reimbursement in the Second Supplemental Application is itemized in Exhibit A hereto, which comprises true and correct copies of Firm billing records. (We have redacted time entries related to fees for which the Secretary is not seeking reimbursement in the Second Supplemental Application¹ and annotated

¹ We have also redacted the names of certain entities (and their employees) that the Firm contacted in connection with the Secretary's efforts to identify a suitable escrow agent to take possession of Fulton County's Dominion voting equipment, but that the Secretary did not ultimately propose be appointed for that role.

those time entries for which the Secretary seeks reimbursement for only a portion of the time at issue.)

8. Attached as Exhibit B hereto is a demonstrative exhibit listing, by date, each of the expenditures of legal-professional time for which the Secretary seeks reimbursement in the Second Supplemental Application, whether those legal professionals are Firm employees or employees of the TLG Firm. Where not based on Firm billing records, the information in this Exhibit is taken from information in the accompanying Affidavit from Hillary Weinstein of the TLG Firm. None of the counsel fees identified in Exhibit B were included in the fee amounts set forth in the Secretary's Initial Application or First Supplemental Application.

9. Attached as Exhibit C hereto is a demonstrative exhibit listing the subset of time entries in Exhibit B related to the selection of an escrow agent to take custody of the voting machines at issue.

10. Attached as Exhibit D hereto is a demonstrative listing the subset of time entries in Exhibit B related to the Secretary's review of and response to multiple versions of a petition for a writ of certiorari that Petitioners served on the Secretary. The petition sought review by the Supreme Court of the United States of the Supreme Court of Pennsylvania's April 19, 2023 decision in this matter.

11. Attached as Exhibit E hereto is a demonstrative listing the subset of time entries in Exhibit B related to the preparation of the Secretary's First Supplemental Application and Second Supplemental Application.

12. Attached as Exhibit F hereto is an itemization and description of the litigation costs the Secretary has incurred and seeks to recover in the Second Supplemental Application, together with documentation of those costs. None of the costs identified in Exhibit F were included in the cost amounts set forth in the Secretary's Initial Application or First Supplemental Application.

13. As shown in the Affidavit of Hillary Weinstein and Exhibit A hereto, the legal-professional work identified in Exhibit B hereto was actually and necessarily performed in connection with the sanction proceedings in the above-captioned action. The fees and costs identified in Exhibits B and F were actually and necessarily incurred by the Secretary in connection with the sanction proceedings in the above-captioned action.

14. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



Dated: February 14, 2024

ROBERT A. WIYGUL

EXHIBIT A

July 26, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40124341

Statement of services rendered and costs incurred through June 30, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/23	Eitan Kagedan	Fulton County: Reach out to representative from [REDACTED] to inquire about willingness to serve as escrow agent.	0.50	150.00
06/01/23	Robert Wiygul	Fulton County: Telephone call and emails with [REDACTED] regarding potential escrow services; follow-up email to [REDACTED] regarding same.	0.40 0.10	-176.00 44.00
06/01/23	Robert Wiygul	Fulton County: Telephone conference and email with [REDACTED] representative regarding potential escrow services; email to Pro V&V with update on discussion with County and status report to Court.	0.50	220.00
06/01/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.40	176.00
06/02/23	Eitan Kagedan	Fulton County: Review and comment on draft letter to T. Carroll concerning escrow issues.	0.30	90.00
06/02/23	Maria Hunter	Fulton County: Review of Order granting Leave to File Supplemental Application for Fees, and update matter calendar with relevant deadlines.	0.10	15.00
06/02/23	Robert Wiygul	Fulton County: Draft letter to Petitioners' counsel in response to T. Carroll's letter dated May 29; review order from Special Master; email to clients regarding draft letter and order; emails with M. Fischer regarding edits to letter; revise, finalize, and transmit letter to Petitioners' counsel.	1.70	748.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/05/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning updates to escrow agent search and plan for supplemental fee petition.	0.20	60.00
06/05/23	Eitan Kagedan	Fulton County: Draft Affidavit of R. Macias in support of Supplemental Fee Application.	0.60	180.00
06/05/23	Robert Wiygul	Fulton County: Emails with [REDACTED] regarding prospective escrow services; email to clients regarding discussions with potential escrow agents.	0.40	176.00
06/06/23	Robert Wiygul	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding escrow-agent issues.	0.30	132.00
06/06/23	Robert Wiygul	Fulton County: Revise affidavit of Ryan Macias in support of supplemental fee application; email to R. Macias regarding same; draft affidavit of D. Mavroudis in support of supplemental fee application; email to D. Mavroudis regarding same; draft affidavit of R. Wiygul in support of supplemental fee application.	0.90	396.00
06/06/23	Robert Wiygul	Fulton County: Email with [REDACTED] scheduling call to discuss escrow issues.	0.10	44.00
06/06/23	Robert Wiygul	Fulton County: Draft supplemental application for fees and costs.	2.40	1,056.00
06/07/23	Eitan Kagedan	Fulton County: Review, revise, and comment on draft supplemental fee application and affidavit of R. Wiygul in support thereof.	1.00	300.00
06/07/23	Eitan Kagedan	Fulton County: Review R. Macias edits to draft affidavit in support of supplemental application.	0.10	30.00
06/07/23	Maria Hunter	Fulton County: Review of Hangley Aronchick Segal Pudlin & Schiller's invoice for May 2023, and draft chart of fees and costs in support of Supplemental Application for Fees and Costs.	1.90	285.00
06/07/23	Maria Hunter	Fulton County: Review of D. Mavroudis Affidavit in support of Supplemental Application for Fees and Costs, and prepare exhibit in support.	0.20	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/07/23	Maria Hunter	Fulton County: Redact personal information and time entries not being submitted for recovery in Supplemental Application for Fees and Costs.	0.30	45.00
06/07/23	Robert Wiygul	Fulton County: Email to [REDACTED] to schedule call regarding potential escrow services.	0.10	44.00
06/07/23	Robert Wiygul	Fulton County: Analyze May 2023 invoice to identify time entries that are not compensable under the Pa. Supreme Court's order and entries that are only partially compensable, in support of supplemental application for costs and fees.	0.30	132.00
06/07/23	Robert Wiygul	Fulton County: Telephone conference with R. Macias regarding potential escrow agents and affidavit in support of supplemental fee application; review and revise updated Macias affidavit and email R. Macias regarding same.	0.50	220.00
06/07/23	Robert Wiygul	Fulton County: Revise supplemental application for fees and supporting Wiygul Affidavit; email to clients regarding same.	0.90	396.00
06/08/23	Eitan Kagedan	Fulton County: Review and suggest edits on fee and cost backups for supplemental application.	0.60	180.00
06/08/23	Maria Hunter	Fulton County: Review and update references to case law and pleadings relied upon in Supplemental Application for Fees and Costs.	0.40	60.00
06/08/23	Maria Hunter	Fulton County: Review and redact non-reimbursable costs in advance of finalizing Supplemental Application for Fees and Costs.	0.10	15.00
06/08/23	Robert Wiygul	Weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	-0.40 0.10	--176.00-- 44.00
06/08/23	Robert Wiygul	Fulton County: Videoconference with [REDACTED] regarding potential escrow services.	0.30	132.00
06/08/23	Robert Wiygul	Fulton County: Review and revise drafts of Exhibits B and C to Wiygul affidavit in support of supplemental application for fees and costs.	0.30	132.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/09/23	Eitan Kagedan	Review redactions to time entries and confirm calculations in support of supplemental fee petition.	1.00	300.00
06/09/23	Maria Hunter	Fulton County: Review invoice for entries relating to non-compensable work in advance of finalizing Supplemental Application for Fees and Costs.	0.20	30.00
06/09/23	Maria Hunter	Fulton County: Review and update exhibits in support of Supplemental Application for Fees and Costs.	0.90	135.00
06/09/23	Maria Hunter	Fulton County: Review, update, finalize and file The Secretary's Supplemental Application for an Award of Fees and Costs Pursuant to The Special Master's Order Dated June 2, 2023.	0.80	120.00
06/09/23	Robert Wiygul	Fulton County: Revise and finalize supplemental application for award of costs and fees; communications with M. Hunter regarding same.	0.80	352.00
06/12/23	Eitan Kagedan	Fulton County: Review correspondence concerning updates to escrow search.	0.10	30.00
06/12/23	Robert Wiygul	Fulton County: Email to clients providing status update on escrow-agent issues and proposing strategy for submission of joint status report and next steps.	0.50	220.00
06/13/23	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning escrow agent selection.	0.20	60.00
06/13/23	Maria Hunter	Fulton County: Communications with Clerk of Commonwealth Court regarding Praeipce to Amend.	0.10	15.00
06/13/23	Maria Hunter	Fulton County: Draft Praeipce to Attach Amended Exhibit to Supplemental Application for Award of Fees and Costs.	0.30	45.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/13/23	Maria Hunter	Fulton County: Prepare Amended Exhibit C to Supplemental Application.	0.10	15.00
06/13/23	Maria Hunter	Fulton County: Review, update, finalize and submit Praeipce to Attach Amended Exhibit to Supplemental Application.	0.30	45.00
06/13/23	Robert Wiygul	Fulton County: Telephone conference with M. Fischer regarding potential escrow agents, joint status report due to Special Master, and next steps.	0.20	88.00
06/13/23	Robert Wiygul	Fulton County: Review and analyze letter from T. Carroll proposing another escrow-agent candidate; emails with R. Macias and clients regarding escrow-agent issues.	0.40	176.00
06/13/23	Robert Wiygul	Fulton County: Draft praecipe to substitute corrected exhibit to supplemental application for fees and costs; emails with clients and team regarding same.	1.00	440.00
06/13/23	Robert Wiygul	Fulton County: Emails with [REDACTED] regarding terms of potential escrow-agent agreement.	0.20	88.00
06/14/23	Eitan Kagedan	Fulton County: Conduct comprehensive review of Petition for Writ of Certiorari.	1.30	390.00
06/14/23	Eitan Kagedan	Fulton County: Review draft status report and response to T. Carroll letter.	0.20	60.00
06/14/23	Eitan Kagedan	Fulton County: Assess potential escrow agents, including investigation into agents proposed by Petitioners and outreach to additional potential agents.	1.10	330.00
06/14/23	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning Joint Stipulation.	0.10	30.00
06/14/23	Maria Hunter	Fulton County: Review, update, finalize and file Joint Status Report.	0.30	45.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/14/23	Robert Wiygul	Fulton County: Research Supreme Court dockets and Supreme Court Rules and draft letter in response to T. Carroll's letter from June 13; draft proposed joint status report; email to clients regarding same; telephone call to S. Gallagher (Dominion) regarding joint status report.	1.70	748.00
06/14/23	Robert Wiygul	Fulton County: Online research regarding escrow agents proposed by Petitioners; communications with team regarding additional research and investigation of proposed escrow agents.	1.00	440.00
06/15/23	Eitan Kagedan	Fulton County: Continue efforts to assess potential escrow agent Insurance Evidence Services (IES), including discussions with representative from IES, review of IES materials, and conferring with R. Wiygul concerning same.	1.40	420.00
06/15/23	Maria Hunter	Fulton County: Review of Joint Status Report and update matter calendar with deadline for submission of Supplemental Report.	0.10	15.00
06/19/23	Maria Hunter	Fulton County: Research regarding social media presence for Cerberus Dynamic Solutions, Insurance Evidence Services and executives for each.	2.30	345.00
06/20/23	Eitan Kagedan	Fulton County: Review due diligence materials concerning potential escrow agents.	0.30	90.00
06/22/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning updates to Escrow Agent search and negotiation and review materials supplied by prospective escrow agents.	0.90	270.00
06/22/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.40 0.10	-176.00 44.00
06/22/23	Robert Wiygul	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding potential escrow agents and upcoming report to Court; telephone conference with E. Kagedan regarding information received from potential escrow agent.	0.90	396.00
06/27/23	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning request for additional time to submit joint recommendation to the Special Master.	0.10	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/27/23	Eitan Kagedan	Fulton County: Review correspondence from R. Wiygul concerning updates to escrow search.	0.20	60.00
06/27/23	Robert Wiygul	Fulton County: Draft long, detailed email to clients proposed strategy for June 28 joint status report, providing information about another potential escrow agent (IES), and discussing strategy for prospective application to appoint escrow agent.	1.30	572.00
06/28/23	Eitan Kagedan	Fulton County: Review correspondence from court.	0.10	30.00
06/28/23	Maria Hunter	Fulton County: Review, update, finalize and file Joint Status Report.	0.10	15.00
06/28/23	Robert Wiygul	Fulton County: Draft status report regarding escrow-agent discussion; emails with clients and counsel for Petitioners and Dominion regarding same; finalize status report for filing.	0.70	308.00
06/29/23	Maria Hunter	Fulton County: Review of Order directing further Status Report, and update matter calendar.	0.10	15.00
06/29/23	Robert Wiygul	Participate in weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.50 0.20	-220.00 88.00
06/29/23	Robert Wiygul	Fulton County: Review Special Master's order setting deadline for submission of applications to appoint escrow agent and email clients regarding same.	0.10	44.00

August 23, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40124957

Statement of services rendered and costs incurred through July 31, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/03/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning Application for Appointment of Escrow Agent and follow up concerning same.	0.60	180.00
07/03/23	Eitan Kagedan	Fulton County: Begin drafting Affidavit of R. Macias in Support of Application for Appointment of Escrow Agent.	0.40	120.00
07/05/23	Robert Wiygul	Fulton County: Telephone conference with E. Kagedan regarding R. Macias affidavit in support of application to appoint escrow agent.	0.30	132.00
07/06/23	Eitan Kagedan	Fulton County: Draft R. Macias Affidavit in Support of Application for Appointment of Escrow Agent and confer with R. Macias concerning same.	1.70	510.00
07/06/23	Robert Wiygul	Fulton County: Email to clients regarding Insurance Evidence Services as potential escrow agent.	0.20	88.00
07/07/23	Eitan Kagedan	Fulton County: Finish drafting Affidavit of R. Macias in support of Application for Appointment of Escrow Agent.	2.50	750.00
07/11/23	Eitan Kagedan	Fulton County: Prepare for and conduct client call concerning application to appoint escrow agent.	0.70	210.00
07/11/23	Eitan Kagedan	Fulton County: Follow up with IES concerning potential escrow services.	0.40	120.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/11/23	Robert Wiygul	Fulton County: Prepare for and participate in videoconference with clients regarding application to appoint escrow agent and potential second-choice candidate; telephone conference with E. Kagedan regarding next steps.	0.80	352.00
07/12/23	Eitan Kagedan	Fulton County: Prepare for, conduct, and follow up regarding conference with IES concerning potential escrow services.	0.50	150.00
07/12/23	Eitan Kagedan	Fulton County: Review and respond to R. Wiygul comments on draft R. Macias Affidavit in support of Application to Appoint Escrow Agent; draft email to R. Macias concerning same.	1.00	300.00
07/12/23	Robert Wiygul	Fulton County: Review and comment on E. Kagedan's draft of R. Macias affidavit in support of application to appoint escrow agent.	0.80	352.00
07/12/23	Robert Wiygul	Fulton County: Prepare for and conduct telephone conference with IES representative regarding potential escrow services; pre- and post-call communications with E. Kagedan regarding next steps.	0.50	220.00
07/13/23	Eitan Kagedan	Fulton County: Revise Affidavit of R. Macias in support of Application to Appoint Escrow Agent.	0.80	240.00
07/13/23	Eitan Kagedan	Fulton County: Draft technical argument portion of Application to Appoint Escrow Agent concerning Pro V&V's qualifications.	3.30	990.00
07/13/23	Robert Wiygul	Fulton County: Emails with client regarding follow-up conference with IES (potential escrow agent) representative.	0.20	88.00
07/14/23	Eitan Kagedan	Fulton County: Complete draft of argument section of Application to Appoint Escrow Agent and revisions to Macias Affidavit in support thereof.	1.80	540.00
07/17/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning strategy for application to appoint escrow agent.	0.50	150.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/17/23	Robert Wiygul	Fulton County: Revise affidavit of R. Macias in support of application to appoint escrow agent; revise draft of argument section of application and draft other portions of application; conference with E. Kagedan regarding same.	1.40	616.00
07/18/23	Eitan Kagedan	Fulton County: Review Petitioners' petition for certiorari.	0.40	120.00
07/18/23	Eitan Kagedan	Fulton County: Review correspondence concerning potential escrow agent IES.	0.20	60.00
07/18/23	Eitan Kagedan	Fulton County: Review draft motion for extension of time to submit application to appoint escrow agent.	0.30	90.00
07/18/23	Maria Hunter	Fulton County: Review, update, finalize, and submit Application for Extension to Submit Filing.	0.20	30.00
07/18/23	Robert Wiygul	Fulton County: Draft letter to counsel for other parties proposing IES as alternative escrow agent; email to counsel for other parties regarding IES and extension of 7/19/23 deadline for parties' submission to Special Master; draft application for extension of time; emails with T. Carroll regarding Petitioners' position on extension request; revise and finalize application for extension.	2.40	1,056.00
07/18/23	Robert Wiygul	Fulton County: Email to clients transmitting Petitioners' petition for writ of certiorari.	0.20	88.00
07/18/23	Robert Wiygul	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding application to appoint escrow agent.	0.20	88.00
07/18/23	Robert Wiygul	Fulton County: Continue revising and supplementing draft of application to appoint escrow agent.	2.10	924.00
07/19/23	Eitan Kagedan	Fulton County: Review Order granting Application for Extension of Time.	0.10	30.00
07/19/23	Maria Hunter	Fulton County: Review of Order granting Motion for Extension and update matter calendar.	0.10	15.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/20/23	Eitan Kagedan	Fulton County: Confer with R. Macias concerning Application to Appoint Escrow Agent.	0.40	120.00
07/20/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	-0.30 0.10	--132.00-- 44.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/26/23	Eitan Kagedan	Fulton County: Revise Macias affidavit in support of application to appoint escrow agent.	0.70	210.00
07/26/23	Robert Wiygul	Fulton County: Continue drafting factual background section of application to appoint escrow agent.	1.10	484.00
07/27/23	Eitan Kagedan	Fulton County: Consider and develop response to correspondence from T. Carroll concerning potential escrow agents.	0.40	120.00
07/27/23	Eitan Kagedan	Fulton County: Revise Macias affidavit in support of application to appoint escrow agent.	0.40	120.00
07/27/23	Eitan Kagedan	Fulton County: Review and comment on draft application to appoint escrow agent.	1.10	330.00
07/27/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.20 0.10	88.00 44.00
07/27/23	Robert Wiygul	Fulton County: Finish drafting factual background section and revising argument section of application to appoint escrow agent; telephone conferences with E. Kagedan regarding same; email to clients regarding same.	6.20	2,728.00
07/28/23	Eitan Kagedan	Fulton County: Conduct outreach to IES concerning additional questions from Petitioners' counsel.	0.20	60.00
07/28/23	Eitan Kagedan	Fulton County: Draft Affidavit of R. Wiygul in support of Application to Appoint Escrow Agent.	1.60	480.00
07/28/23	Eitan Kagedan	Fulton County: Revise affidavits and application in light of change in IES position.	1.50	450.00
07/28/23	Eitan Kagedan	Fulton County: Review Dominion's application for relief.	0.90	270.00
07/28/23	Kristine Bompadre	Fulton County: Review, edit, finalize, and file Secretary's Application to Appoint Escrow Agent.	3.10	465.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/28/23	Robert Wiygul	Fulton County: Communications with T. Carroll, S. Gallagher, E. Kagedan, and clients regarding IES's withdrawal as escrow-agent candidate; telephone conference with Pro V&V regarding status of escrow-agent selection process; revise and finalize application to appoint escrow agent and supporting affidavits and exhibits; communications with team regarding same.	3.90	1,716.00
07/29/23	Robert Wiygul	Fulton County: Review Petitioners' filing regarding appointment of escrow agent; investigate authors of affidavits attached to same; emails with R. Macias regarding Petitioners' filing; email to clients transmitting Petitioners' filing.	1.30	572.00
07/31/23	Eitan Kagedan	Fulton County: Review and consider response to Petitioners' Application.	2.00	600.00
07/31/23	Robert Wiygul	Fulton County: Emails with K. Kotula and D. Mavroudis regarding Petitioners' application to appoint escrow agent and a potential response.	0.20	88.00
07/31/23	Robert Wiygul	Fulton County: Close review of Petitioners' escrow-agent submission; telephone conference and in-person conference with E. Kagedan regarding response to Petitioners' application to appoint escrow agent; review email from R. Macias regarding Petitioners' application.	1.20	528.00

September 28, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40125561

Statement of services rendered and costs incurred through August 31, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/01/23	Eitan Kagedan	Fulton County: Review correspondence with R. Macias and with clients concerning Petitioners' Application to appoint escrow agent.	0.40	120.00
08/01/23	Robert Wiygul	Fulton County: Research caselaw in support of potential motion to strike Petitioners' affidavits.	0.50	220.00
08/03/23	Eitan Kagedan	Fulton County: Review Scheduling Order setting evidentiary hearing and consider strategy and next steps.	0.80	240.00
08/03/23	Eitan Kagedan	Fulton County: Research scope of power to compel attendance of witness via notice to attend, to determine applicability to various potential Fulton County witnesses (2.0 hours spent).	1.20	360.00
08/03/23	Maria Hunter	Fulton County: Review of Scheduling Order relating to Third Party Neutral Escrow Agent and calendar deadlines.	0.30	45.00
08/03/23	Robert Wiygul	Fulton County: Review Special Master's order scheduling evidentiary hearing on appointment of escrow agent; analyze evidentiary and strategic issues regarding same; telephone conferences with E. Kagedan and D. Mavroudis regarding hearing and strategy; email to R. Macias regarding his availability for hearing; email to clients regarding Special Master's scheduling order.	1.00	440.00
08/03/23	Robert Wiygul	Fulton County: Research Cerberus and its principal, Joseph Sabia, in preparation for evidentiary hearing.	0.90	396.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/03/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	-0.50 0.10	--220.00-- 44.00
08/04/23	Maria Hunter	Fulton County: Review of U.S. Supreme Court docket report and update matter calendar with relevant response date.	0.10	15.00
08/04/23	Robert Wiygul	Fulton County: Review and analyze Petitioners' cert petition and SCOTUS rules regarding conference dates; email clients regarding same.	0.70	308.00
08/04/23	Robert Wiygul	Fulton County: Begin comprehensive review of file for potential evidentiary-hearing exhibits and identify need for further investigation regarding potential hearing exhibits.	2.30	1,012.00
08/07/23	Eitan Kagedan	Fulton County: Confer with Dominion's counsel concerning evidentiary hearing.	0.30	90.00
08/07/23	Eitan Kagedan	Fulton County: Confer with clients to develop strategy for evidentiary hearing.	0.60	180.00
08/07/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning strategy for evidentiary hearing.	0.30	90.00
08/07/23	Eitan Kagedan	Fulton County: Identify potential exhibits for evidentiary hearing.	1.40	420.00
08/07/23	Eitan Kagedan	Fulton County: Review and respond to correspondence from R. Wiygul concerning potential exhibits for evidentiary hearing.	0.20	60.00
08/07/23	Maria Hunter	Fulton County: Research regarding criminal indictments filed in Oakland County, Michigan, relating to People v. Matthew Deparno, case number 2023-285729-FH; People v. Daire Rendon, case number 2023-285730-FH; and People vs. Stefanie Lambert Junttila, case number 2023-285759-FH, in the Sixth Judicial Circuit Court of Oakland County, in preparation for evidentiary hearing.	0.70	105.00
08/07/23	Maria Hunter	Fulton County: Communications with Michigan Circuit Court Clerk regarding obtaining indictments in Criminal actions, in preparation for evidentiary hearing.	0.20	30.00
08/07/23	Maria Hunter	Fulton County: LinkedIn research regarding J. Sabia for potential use as exhibit at Evidentiary Hearing.	0.60	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/07/23	Robert Wiygul	Fulton County: Conference with E. Kagedan regarding strategy for evidentiary hearing and identification of potential hearing exhibits.	0.30	132.00
08/07/23	Robert Wiygul	Fulton County: Telephone conferences with M. Hunter regarding collecting and organizing potential evidentiary hearing exhibits.	0.30	132.00
08/07/23	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding upcoming evidentiary hearing and Petitioners' petition for writ of certiorari.	0.30	132.00
08/07/23	Robert Wiygul	Fulton County: Telephone call to Pro V&V regarding status update; left message.	0.10	44.00
08/07/23	Robert Wiygul	Fulton County: Prepare for and conduct videoconference with clients regarding strategy for evidentiary hearing and response to Petitioners' petition for writ of certiorari.	0.60	264.00
08/08/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning pre-hearing filings.	0.40	120.00
08/08/23	Eitan Kagedan	Fulton County: Begin drafting pre-hearing submission due August 14 regarding hearing witnesses and exhibits.	0.90	270.00
08/08/23	Maria Hunter	Fulton County: Communications with Muskegon County Prosecutor regarding criminal indictments of Attorney Lambert et al.	0.10	15.00
08/08/23	Maria Hunter	Fulton County: Draft list of proposed exhibits for use at Evidentiary Hearing.	2.10	315.00
08/08/23	Maria Hunter	Fulton County: Research regarding Subpoenas issued in October 2022 in preparation for issuing subpoenas for upcoming evidentiary hearing.	0.20	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/08/23	Robert Wiygul	Fulton County: Review potential hearing exhibits identified by E. Kagedan; review and identify additional potential hearing exhibits; emails with M. Hunter regarding obtaining copy of S. Lambert's indictment; conference with E. Kagedan regarding hearing exhibits, scope of R. Macias's testimony, and drafting of submission on hearing witnesses and exhibits due August 14.	1.90	836.00
08/09/23	Eitan Kagedan	Fulton County: Prepare for and conduct conference with R. Macias concerning upcoming evidentiary hearing.	1.00	300.00
08/09/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning strategy and approach to upcoming evidentiary hearing.	0.50	150.00
08/09/23	Eitan Kagedan	Fulton County: Draft pre-hearing submission, including offer of proof for potential witnesses and organization of potential exhibits.	1.80	540.00
08/09/23	Maria Hunter	Fulton County: Various communications with Clerk of Commonwealth Court and contact person in Philadelphia regarding issuance of Subpoenas compelling attendance at Evidentiary Hearing.	0.20	30.00
08/09/23	Maria Hunter	Fulton County: Draft correspondence to Commonwealth Court enclosing fee payment regarding Subpoenas and coordinate issuance of check.	0.30	45.00
08/09/23	Maria Hunter	Fulton County: Review and update the Secretary's list of witnesses and exhibit for Evidentiary Hearing.	0.60	90.00
08/09/23	Robert Wiygul	Fulton County: Conference with E. Kagedan regarding draft exhibit and witness lists and drafting of pre-hearing applications.	0.50	220.00
08/09/23	Robert Wiygul	Fulton County: Zoom conference with R. Macias to discuss supplemental affidavit for evidentiary hearing, potential additional hearing exhibits, and scope and topics of hearing testimony.	0.90	396.00
08/09/23	Robert Wiygul	Fulton County: Review SCOTUS docket and draft waiver of right to respond to Petitioners' petition for writ of certiorari; email to clients regarding same.	0.40	176.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/10/23	Eitan Kagedan	Fulton County: Develop strategy for drafting Motions in Limine in advance of evidentiary hearing.	0.60	180.00
08/10/23	Eitan Kagedan	Fulton County: Finish drafting pre-hearing submission concerning proposed exhibits and witnesses.	0.70	210.00
08/10/23	Eitan Kagedan	Fulton County: Draft supplemental affidavit of R. Macias concerning Cerberus.	1.80	540.00
08/10/23	Robert Wiygul	Weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.40 0.10	176.00 44.00
08/10/23	Robert Wiygul	Fulton County: Draft application for permission for Michael Walker to testify remotely via videoconference at the 8/28/23 evidentiary hearing.	1.10	484.00
08/10/23	Robert Wiygul	Fulton County: Email and telephone call to Michigan prosecutor seeking copy of Lambert indictment.	0.30	132.00
08/10/23	Robert Wiygul	Fulton County: Email M. Walker (Pro V&V) requesting documents and information in preparation for evidentiary hearing.	0.20	88.00
08/10/23	Robert Wiygul	Fulton County: Finalize and file waiver of right to respond to petition for writ of certiorari; email to other parties' counsel regarding same.	0.30	132.00
08/11/23	Eitan Kagedan	Fulton County: Review and comment on draft Application for Permission for Michael Walker to Testify Remotely Via Videoconference at the Evidentiary Hearing Scheduled for August 28, 2023.	0.20	60.00
08/11/23	Eitan Kagedan	Fulton County: Review correspondence concerning pre-hearing filings.	0.20	60.00
08/11/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning proposed exhibit and witness list, revise draft submission accordingly.	0.70	210.00
08/11/23	Eitan Kagedan	Fulton County: Review correspondence concerning potential escrow agreement and consider approach to same.	0.40	120.00
08/11/23	Maria Hunter	Fulton County: Review and update documents for potential use as exhibits at Evidentiary Hearing.	0.90	135.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/11/23	Maria Hunter	Fulton County: Review and update Secretary's List of Exhibits for Evidentiary Hearing.	0.60	90.00
08/11/23	Robert Wiygul	Fulton County: Email clients regarding model escrow-agent agreements concerning technology.	0.20	88.00
08/11/23	Robert Wiygul	Fulton County: Revise submission containing Secretary's list of witnesses and exhibits; email to clients regarding same; revise supplemental affidavit of R. Macias; email to R. Macias regarding same; draft application of M. Walker in support of application for permission to testify remotely; email M. Walker regarding same.	2.10	924.00
08/13/23	Maria Hunter	Fulton County: Draft Notices to Attend directed to R. Bunch, P. Shives, S. Ulsh, E. Martin and P. Hess.	0.70	105.00
08/14/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning pre-hearing submissions.	0.20	60.00
08/14/23	Eitan Kagedan	Fulton County: Review and finalize pre-hearing submission regarding witnesses and exhibits.	0.90	270.00
08/14/23	Eitan Kagedan	Fulton County: Review and revise notices to attend.	0.30	90.00
08/14/23	Eitan Kagedan	Fulton County: Review R. Macias edits to draft supplemental affidavit.	0.20	60.00
08/14/23	Maria Hunter	Fulton County: Review, update, finalize and file Secretary's Witness and Exhibit List.	0.90	135.00
08/14/23	Robert Wiygul	Fulton County: Review edits by R. Macias to his supplemental affidavit in support of application to appoint escrow agent; email to R. Macias regarding same.	0.30	132.00
08/15/23	Eitan Kagedan	Fulton County: Review petitioners' pre-hearing submission and correspondence related thereto.	1.10	330.00
08/15/23	Eitan Kagedan	Fulton County: Draft motion in limine concerning qualification of R. Macias as expert (2.2 hours spent).	1.50	450.00
08/15/23	Eitan Kagedan	Fulton County: Review proposed hearing exhibits to ensure accuracy and completeness.	0.30	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/15/23	Eitan Kagedan	Fulton County: Review hearing transcripts from November 2022 to identify key portions to cite in support of motions in limine.	1.70	510.00
08/15/23	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll.	0.10	30.00
08/15/23	Eitan Kagedan	Fulton County: Review escrow agreements received from the Commonwealth to identify areas to potentially include in proposed agreement.	1.10	330.00
08/15/23	Maria Hunter	Fulton County: Research regarding P. Hess and E. Martin in preparation for drafting and serving subpoenas on them for Evidentiary Hearing.	0.80	120.00
08/15/23	Robert Wiygul	Fulton County: Revise, finalize, and services Notices to Attend August 28th hearing on Commissioners Ulsh, Bunch, and Shives, Director of Election Hess, and Technology Director Martin; email to Petitioners' counsel regarding same; email to counsel for Petitioners and Dominion seeking position on Secretary's request for permission to present testimony of M. Walker remotely.	0.60	264.00
08/15/23	Robert Wiygul	Fulton County: Review and analyze pre-hearing submission of Petitioners regarding witnesses; emails to clients and R. Macias regarding same.	0.90	396.00
08/15/23	Robert Wiygul	Fulton County: Telephone conference with M. Hunter regarding preparation of hearing subpoenas directed to E. Martin and P. Hess and marking of hearing exhibits.	0.20	88.00
08/15/23	Robert Wiygul	Fulton County: Emails to clients regarding Notices to Attend served on Petitioners' counsel and potential service of hearing subpoenas on E. Martin and P. Hess.	0.10	44.00
08/16/23	Eitan Kagedan	Fulton County: Review R. Wiygul comments on Motion in Limine concerning expert qualification.	0.20	60.00
08/16/23	Eitan Kagedan	Fulton County: Draft R. Macias examination outline.	1.70	510.00
08/16/23	Eitan Kagedan	Fulton County: Prepare for and conduct call with R. Macias concerning Petitioners' pre-hearing submission.	1.40	420.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/16/23	Eitan Kagedan	Fulton County: Prepare witness subpoenas.	0.80	240.00
08/16/23	Eitan Kagedan	Fulton County: Review and comment on draft Motion in Limine concerning admission of evidence.	0.40	120.00
08/16/23	Maria Hunter	Fulton County: Communications with Process Server regarding service of Subpoenas on P. Hess and E. Martin.	0.10	15.00
08/16/23	Maria Hunter	Fulton County: Coordinate drafting of Subpoenas on P. Hess and E. Martin and witness fee checks.	0.50	75.00
08/16/23	Maria Hunter	Fulton County: Draft and update cover letters directed to E. Martin and P. Hess enclosing Subpoenas for attendance at hearing.	0.30	45.00
08/16/23	Maria Hunter	Fulton County: Draft and update cover letter to Process Server with directions on service of Subpoenas.	0.20	30.00
08/16/23	Maria Hunter	Fulton County: Work on Subpoena package directed to E. Martin and P. Hess regarding attendance at Evidentiary Hearing.	0.80	120.00
08/16/23	Maria Hunter	Fulton County: Various communications with Process Server regarding service of Subpoenas.	0.10	15.00
08/16/23	Robert Wiygul	Fulton County: Zoom conference with R. Macias regarding Petitioners' witness list and offers of proof for August 28th hearing; conference with E. Kagedan regarding motions in limine and hearing subpoenas.	1.00	440.00
08/16/23	Robert Wiygul	Fulton County: Review and revise document request attached to hearing subpoenas directed to Hess and Martin.	0.20	88.00
08/16/23	Robert Wiygul	Fulton County: Revise letters to witnesses enclosing subpoenas; revise letter to process server with service instructions; emails with team regarding same.	0.40	176.00
08/16/23	Robert Wiygul	Fulton County: Emails with clients regarding application to allow M. Walker to testify via videoconference at 8/28 hearing; finalize application for filing.	0.50	220.00
08/16/23	Robert Wiygul	Fulton County: Review and revise draft motion in limine regarding expert qualification of R. Macias.	1.10	484.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/16/23	Robert Wiygul	Fulton County: Complete research of caselaw in support of motion in limine to admit official records from government websites; draft motion in limine; emails to team and clients regarding same.	3.20	1,408.00
08/17/23	Eitan Kagedan	Fulton County: Draft proposed order concerning appointment of escrow agent.	2.40	720.00
08/17/23	Maria Hunter	Fulton County: Coordinate archival paper set of Secretary's filings for delivery to the Court pursuant to Court requirement.	0.10	15.00
08/17/23	Maria Hunter	Fulton County: Review and update Secretary's Hearing exhibits in advance of Evidentiary Hearing.	1.00	150.00
08/17/23	Maria Hunter	Fulton County: Communications with Clerk regarding Court Reporter requirement for hearing.	0.10	15.00
08/17/23	Maria Hunter	Fulton County: Review and update Motion in Limine regarding Admission of Government Records.	0.50	75.00
08/17/23	Maria Hunter	Fulton County: Review and update exhibits to Motions in Limine regarding Admission of Government Records.	1.20	180.00
08/17/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.40 0.20	--176.00-- 88.00
08/17/23	Robert Wiygul	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding Petitioners' witness list and potential motions in limine.	0.20	88.00
08/17/23	Robert Wiygul	Fulton County: Draft response to T. Carroll's email regarding Fulton County witnesses on the Secretary's witness list; telephone conferences with process server regarding service of subpoenas on E. Martin and P. Hess; email to counsel for Petitioners and Dominion transmitting copies of subpoenas.	0.60	264.00
08/17/23	Robert Wiygul	Fulton County: Revise motions in limine and prepare for hearing; conferences with team regarding same.	1.20	528.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/18/23	Eitan Kagedan	Fulton County: Review and analyze parties' motions in limine and consider next steps, including potential responses to motions, in advance of evidentiary hearing.	0.90	270.00
08/18/23	Maria Hunter	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 1 (to Exclude the Witness Testimony Proffered by Petitioners and Preclude Vexatious, Obdurate, Dilatory, and Bad-Faith Litigation Conduct).	1.30	195.00
08/18/23	Maria Hunter	Fulton County: Review and update exhibits to various Motions in Limine.	0.30	45.00
08/18/23	Maria Hunter	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 2 (to Qualify Ryan Macias as an Expert in Election Technology and Security).	0.50	75.00
08/18/23	Maria Hunter	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 3 (to Admit Certain Government Records into Evidence).	0.40	60.00
08/18/23	Robert Wiygul	Fulton County: Revise and finalize motions in limine to admit government documents and qualify R. Macias as expert.	0.40	176.00
08/18/23	Robert Wiygul	Fulton County: Draft motion in limine no. 1 to exclude Petitioners' proffered witness testimony; email to clients regarding same; revise and finalize same in response to client comments.	5.70	2,508.00
08/18/23	Robert Wiygul	Fulton County: Review Petitioners' motion for admission pro hac vice, objection to the Secretary's witness list, and motion to stay proceedings and Dominion's objection to Petitioners' witness list; emails to clients regarding same; research case law in preparation for responding to motion to stay; research cases involving R. Newman response to motion for admission pro hac vice.	2.90	1,276.00
08/19/23	Robert Wiygul	Fulton County: Research case law regarding motions for stay pending disposition of petitions for writ of certiorari in preparation for responding to Petitioners' motion for stay.	0.50	220.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/20/23	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding Petitioners' filings from Friday evening and upcoming evidentiary hearing.	0.40	176.00
08/20/23	Robert Wiygul	Fulton County: Draft answer in opposition to Petitioners' motion to stay proceedings.	2.80	1,232.00
08/20/23	Robert Wiygul	Fulton County: Continue researching litigation history of R. Newman; draft lengthy email to clients regarding same and strategy for responding to application for admission pro hac vice.	2.30	1,012.00
08/21/23	Eitan Kagedan	Fulton County: Review Petitioners' pre-hearing filings and review and comment on draft responses thereto.	0.20	60.00
08/21/23	Eitan Kagedan	Fulton County: Continue drafting proposed order for appointment of escrow agent.	1.30	390.00
08/21/23	John Hill	Fulton County: Revise pre-hearing submissions and briefs.	1.20	300.00
08/21/23	John Hill	Fulton County: Draft outline for hearing cross examination of Fulton County's proposed escrow agent.	3.20	800.00
08/21/23	Maria Hunter	Fulton County: Review, update, finalize and file Answer to Motion to Stay.	1.50	225.00
08/21/23	Maria Hunter	Fulton County: Review of Order scheduling Pre-Hearing Telephonic Conference for calendaring.	0.10	15.00
08/21/23	Maria Hunter	Fulton County: Review of Order denying Fulton County's Pro Hac Vice and scheduling deadline for submission of Amended Pro Hac Vice for calendaring.	0.10	15.00
08/21/23	Maria Hunter	Fulton County: Review and update Answer to Petitioner's Amended Pro Hac Vice Application and prepare exhibits in support.	0.80	120.00
08/21/23	Maria Hunter	Fulton County: Review, update, finalize and file Answer to Petitioners' Objection to Secretary's Witness List.	1.00	150.00
08/21/23	Robert Wiygul	Fulton County: Revise and finalize answer to Petitioners' motion to stay proceedings.	0.50	220.00
08/21/23	Robert Wiygul	Fulton County: Draft answer to Petitioners' application for admission pro hac vice of R. Newman.	4.70	2,068.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/21/23	Robert Wiygul	Fulton County: Review Petitioners' Consolidated Response to Dominion's Objections.	0.20	88.00
08/21/23	Robert Wiygul	Fulton County: Emails with R. Macias and M. Walker to schedule conferences to prepare for evidentiary hearing.	0.10	44.00
08/21/23	Robert Wiygul	Fulton County: Draft answer to Petitioners' objection to the Secretary's witness list; email to clients regarding same.	2.00	880.00
08/22/23	John Hill	Fulton County: Participate in witness prep with R. Wiygul and proposed escrow agent (M. Walker).	2.00	500.00
08/22/23	John Hill	Fulton County: Participate in witness prep with R. Wiygul and R. Macias.	1.00	250.00
08/22/23	Maria Hunter	Fulton County: Review and update exhibits to Secretary's Answer to Amended Pro Hac Vice Application.	0.40	60.00
08/22/23	Maria Hunter	Fulton County: Communications with K. Michalczyk regarding preparation and submission of archival paper copies of Secretary's filings.	0.30	45.00
08/22/23	Maria Hunter	Fulton County: Review and update Secretary's Answer to Amended Pro Hac Vice Application.	1.00	150.00
08/22/23	Robert Wiygul	Fulton County: Revise answer to application pro hac vice per comments by M. Hunter and J. Hill.	0.60	264.00
08/22/23	Robert Wiygul	Fulton County: Revise and supplement proposed order governing escrow services; emails to team and R. Macias regarding same.	1.90	836.00
08/22/23	Robert Wiygul	Fulton County: Review Dominion's waiver of right to respond to Petitioners' petition for writ of certiorari; email to clients regarding same.	0.20	88.00
08/22/23	Robert Wiygul	Fulton County: Review Dominion's objection to Petitioners' motion for admission PHV; email to clients regarding same.	0.20	88.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/22/23	Robert Wiygul	Fulton County: Review client comments on answer to pro hac vice application; telephone conversations with J. Hill regarding edits to same; review Petitioners' amended motion for admission pro hac vice; revise and finalize answer to amended PHV application.	1.20	528.00
08/23/23	John Hill	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.20	300.00
08/23/23	John Hill	Fulton County: Attend telephonic pre-hearing conference with Court regarding evidentiary hearing on appointment of escrow agent.	0.90	225.00
08/23/23	John Hill	Fulton County: Confer with R. Wiygul and M. Walker to prepare for evidentiary hearing on appointment of escrow agent.	1.20	300.00
08/23/23	John Hill	Fulton County: Confer with R. Wiygul to prepare for evidentiary hearing on appointment of escrow agent.	0.30	75.00
08/23/23	Robert Wiygul	Fulton County: Review file and prepare for pre-hearing status conference; attend status conference; telephone conference with J. Hill and D. Mavroudis to debrief and discuss next steps.	2.30	1,012.00
08/23/23	Robert Wiygul	Fulton County: Review orders denying Petitioners' motion to stay proceedings, permitting M. Walker to testify remotely, granting the Secretary's Motion in Limine No. 2, and granting the Secretary's Motion in Limine No. 3; emails to clients regarding same; email to court staff to provide M. Walker's contact information.	0.80	352.00
08/23/23	Robert Wiygul	Fulton County: Review second amended application for admission pro hac vice of R. Newman; email to clients regarding same.	0.10	44.00
08/23/23	Robert Wiygul	Fulton County: Draft lengthy email to clients regarding pre-hearing conference before Special Master.	0.70	308.00
08/23/23	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding status conference and upcoming evidentiary hearing.	0.20	88.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/23/23	Robert Wiygul	Fulton County: Zoom conference with R. Macias to prepare for evidentiary hearing; follow-up conference with J. Hill regarding revisions to witness-examination outlines.	1.40	616.00
08/23/23	Robert Wiygul	Fulton County: Draft outline of M. Walker's direct examination and Zoom conference with M. Walker to prepare for evidentiary hearing.	2.50	1,100.00
08/24/23	John Hill	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.50	375.00
08/24/23	Robert Wiygul	Fulton County: Review memoranda and orders resolving motions in limine seeking to exclude witness testimony; telephone conference with J. Hill regarding same; email to clients regarding same.	0.50	220.00
08/24/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.40 0.20	--176.00-- 88.00
08/24/23	Robert Wiygul	Fulton County: Revise and supplement outline of direct examination of R. Macias; videoconference with R. Macias to prepare for hearing.	2.50	1,100.00
08/25/23	John Hill	Fulton County: Research standard for sequestration of witnesses and draft bench memorandum regarding same.	1.80	450.00
08/25/23	John Hill	Fulton County: Investigate and analyze impeachment material for cross-examination of County's expert witness (B. Cotton).	2.00	500.00
08/25/23	Maria Hunter	Fulton County: Review correspondence to Court enclosing archival paper copies of filings and identify missing documents.	0.40	60.00
08/25/23	Maria Hunter	Fulton County: Plan and prepare for Evidentiary Hearing.	1.30	195.00
08/25/23	Maria Hunter	Fulton County: Review and analyze copies of prior hearing transcripts from November 2022 for potential use at Evidentiary Hearing.	1.20	180.00
08/25/23	Maria Hunter	Fulton County: Review Secretary's filing and draft Demonstrative Exhibit regarding Pro V&V Fees for Escrow Services.	0.40	60.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/25/23	Maria Hunter	Fulton County: Review, update, finalize and file Response to Petitioners' Application to Present Remote Testimony and New Cotton Affidavit.	1.40	210.00
08/25/23	Maria Hunter	Fulton County: Prepare additional hearing exhibits to include in exhibit binders.	0.60	90.00
08/25/23	Robert Wiygul	Fulton County: Videoconference with M. Walker to prepare for hearing testimony.	1.40	616.00
08/25/23	Robert Wiygul	Fulton County: Review and analyze Petitioners' application to permit remote testimony of their witnesses and attached affidavits; telephone conference with J. Hill regarding same; email to clients regarding same; email to R. Macias regarding new affidavit from B. Cotton.	0.40	176.00
08/25/23	Robert Wiygul	Fulton County: Draft response to Petitioners' amended application to present remote witness testimony and cross-application to strike new affidavit of B. Cotton.	1.70	748.00
08/25/23	Robert Wiygul	Fulton County: Refine and supplement witness-examination outlines, review and annotate potential hearing exhibits, and prepare for hearing; conferences with team members regarding same.	1.50	660.00
08/26/23	John Hill	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.00	250.00
08/26/23	Maria Hunter	Fulton County: Prepare materials for potential use at Evidentiary Hearing.	4.00	600.00
08/26/23	Robert Wiygul	Fulton County: Revise outline of R. Macias' direct examination; videoconference with R. Macias to prepare for evidentiary hearing.	2.00	880.00
08/26/23	Robert Wiygul	Fulton County: Revise hearing-examination outlines for R. Macias and M. Walker; detailed review and annotation of potential hearing exhibits; review past affidavits and deposition testimony of B. Cotton in preparation for cross-examination; conferences with M. Hunter regarding potential additional hearing exhibits and preparation for hearing.	4.80	2,112.00
08/27/23	Maria Hunter	Fulton County: Research J. Sabia for anticipated cross-examination and plan and prepare for Evidentiary Hearing.	2.70	405.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/27/23	Robert Wiygul	Fulton County: Draft outline for examination of Fulton County witnesses.	0.80	352.00
08/27/23	Robert Wiygul	Fulton County: Videoconference with M. Walker to prepare for evidentiary hearing.	0.80	352.00
08/27/23	Robert Wiygul	Fulton County: Analyze potential avenues of cross-examination for J. Sabia and B. Cotton (including travel from Philadelphia to Harrisburg for hearing).	2.00	880.00
08/27/23	Robert Wiygul	Fulton County: Conference with R. Macias regarding direct examination and potential rebuttal testimony and potential testimony from B. Cotton.	1.90	836.00
08/27/23	Robert Wiygul	Fulton County: Continuing drafting and refining outlines for examinations of Fulton County witnesses and J. Sabia.	3.50	1,540.00
08/27/23	Robert Wiygul	Fulton County: Finish reviewing deposition of B. Cotton in preparation for cross-examination.	1.70	748.00
08/28/23	Eitan Kagedan	Fulton County: Prepare for, appear for, and follow up concerning evidentiary hearing on appointment of escrow agent, including travel between Philadelphia and Harrisburg.	17.20	5,160.00
08/28/23	John Hill	Fulton County: Travel to and from and attend hearing on appointment of escrow agent (15 hours total).	15.00	0.00
08/28/23	Maria Hunter	Fulton County: Travel to/from Harrisburg to attend Evidentiary Hearing.	3.80	570.00
08/28/23	Maria Hunter	Fulton County: Plan and prepare for Evidentiary Hearing.	1.70	255.00
08/28/23	Maria Hunter	Fulton County: Attend evidentiary hearing.	10.30	1,545.00
08/28/23	Robert Wiygul	Fulton County: Draft outlines for oral argument on motion to strike second affidavit of B. Cotton and request for sequestration of J. Sabia; prepare for and attend evidentiary hearing; conferences with team and clients regarding same (including 2.0 hours of travel from Harrisburg to Philadelphia).	12.90	5,676.00
08/29/23	Eitan Kagedan	Fulton County: Draft email to clients concerning sequence of remaining witness examinations.	0.30	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/29/23	Eitan Kagedan	Fulton County: Review correspondence regarding Petitioners' cross-examination of R. Macias and consider implications for testimony of M. Walker and potential rebuttal testimony by R. Macias.	0.70	210.00
08/29/23	Eitan Kagedan	Fulton County: Prepare for continuation of evidentiary hearing, including review of witness examination outlines and social media postings by J. Sabia.	2.40	720.00
08/29/23	Eitan Kagedan	Fulton County: Research authority regarding taking judicial notice of content of websites in preparation for potential evidentiary arguments at hearing (2.6 hours spent).	1.90	570.00
08/29/23	Eitan Kagedan	Fulton County: Telephone conference with M. Walker to prepare for upcoming testimony.	0.80	240.00
08/29/23	Eitan Kagedan	Fulton County: Travel to Harrisburg for continuation of evidentiary hearings.	2.00	600.00
08/29/23	John Hill	Fulton County: Review and collect social media posts relevant to impeachment of J. Sabia.	2.50	625.00
08/29/23	John Hill	Fulton County: Review and collect material relevant to impeachment and voir dire of County's proposed expert witness (B. Cotton).	2.50	625.00
08/29/23	Maria Hunter	Fulton County: Research and review of social media posts by J. Sabia in advance of cross examination at Evidentiary Hearing and prepare potential exhibits regarding same (6.6 hours spent).	4.00	600.00
08/29/23	Robert Wiygul	Fulton County: Train travel from Philadelphia to Harrisburg for second day of hearing, including revising and supplementing cross-examination outline for J. Sabia and emails with team regarding collecting social media posts and exhibits.	1.80	792.00
08/29/23	Robert Wiygul	Fulton County: Revise outline of examination of M. Walker and videoconference with M. Walker to prepare for hearing.	1.20	528.00
08/29/23	Robert Wiygul	Fulton County: Conference with R. Macias to prepare for cross-examination of B. Cotton and discuss potential topics of rebuttal testimony.	1.00	440.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/29/23	Robert Wiygul	Fulton County: Finish revising and supplementing outline of J. Sabia's examination and revise outline of examination of B. Cotton.	1.90	836.00
08/29/23	Robert Wiygul	Fulton County: Research J. Sabia's Facebook and Twitter posts in support of cross-examination of J. Sabia; emails to clients regarding order of forthcoming witness examinations and communications with M. Walker; review Petitioners' application for reconsideration of SCOPA scheduling order.	2.90	1,276.00
08/30/23	Eitan Kagedan	Fulton County: Prepare for, appear for, and follow up concerning evidentiary hearing on appointment of escrow agent.	11.00	3,300.00
08/30/23	Eitan Kagedan	Fulton County: Prepare for continuation of evidentiary hearing, including researching caselaw regarding timeliness of service of subpoenas, reviewing witness examination outlines, and reviewing and commenting on draft response to applications to stay.	2.80	840.00
08/30/23	John Hill	Fulton County: Travel to and from and attend hearing on appointment of escrow agent, including drafting of SCOPA response to Petitioners' applications to stay.	14.00	3,500.00
08/30/23	Maria Hunter	Fulton County: Travel to Harrisburg to attend continued Evidentiary Hearing.	1.80	270.00
08/30/23	Maria Hunter	Fulton County: Plan and prepare for continued evidentiary hearing.	1.80	270.00
08/30/23	Maria Hunter	Fulton County: Attend continued evidentiary hearing.	8.70	1,305.00
08/30/23	Maria Hunter	Fulton County: Review and update Answer to Fulton County's Emergency Application for a Stay upon Special Master's Denial of Same, and prepare exhibits.	1.80	270.00
08/30/23	Maria Hunter	Fulton County: Review of proposed images regarding social media for cross examination of J. Sabia.	0.70	105.00
08/30/23	Robert Wiygul	Fulton County: Prepare for and attend evidentiary hearing; conferences with team, clients, and R. Macias regarding same.	9.70	4,268.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/30/23	Robert Wiygul	Fulton County: Review and revise and comment on draft answer to Petitioners' application seeking stay of proceedings from Pennsylvania Supreme Court.	1.00	440.00
08/31/23	Christine Pratt	Fulton County: Review for accuracy the Response to an Emergency Application for Stay and Exhibits A - M in support thereof, obtain attorney's approval to file, and file the same in the Pa. Supreme Court.	0.90	135.00
08/31/23	Eitan Kagedan	Fulton County: Prepare for, appear for, and follow up concerning continuation of evidentiary hearing on appointment of escrow agent, including travel from Harrisburg to Philadelphia.	12.50	3,750.00
08/31/23	John Hill	Fulton County: Observe hearing on appointment of escrow agent (3.0 hours spent).	3.00	0.00
08/31/23	John Hill	Fulton County: Revise SCOPA response to emergency application for stay.	1.00	250.00
08/31/23	Maria Hunter	Fulton County: Plan and prepare for continued Evidentiary Hearing.	1.50	225.00
08/31/23	Maria Hunter	Fulton County: Attend continued Evidentiary Hearing.	7.40	1,110.00
08/31/23	Maria Hunter	Fulton County: Travel from Harrisburg to Philadelphia.	2.00	300.00
08/31/23	Robert Wiygul	Fulton County: Revise and supplement cross-examination outline for J. Sabia and revise cross-examination outline for B. Cotton.	2.50	1,100.00
08/31/23	Robert Wiygul	Fulton County: Prepare for and attend evidentiary hearing; conferences with team and clients regarding same.	9.70	4,268.00
08/31/23	Robert Wiygul	Fulton County: Travel from Harrisburg to Philadelphia following hearing, including de-briefing with team and email to client about next steps en route (excluding time spent working on other matters).	1.50	660.00

October 24, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40126225

Statement of services rendered and costs incurred through September 30, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/01/23	Robert Wiygul	Fulton County: Telephone conference with S. Kirkpatrick regarding Petitioners' SCOTUS application for stay.	0.20	88.00
09/01/23	Robert Wiygul	Fulton County: Email to S. Kirkpatrick regarding Secretary's opposition to Petitioners' SCOPA applications to stay.	0.10	44.00
09/05/23	Maria Hunter	Fulton County: Review of transcripts of hearing held on August 30, 2023 and August 31, 2023; communications with Court Reporter regarding transcript for hearing held on August 28, 2023.	0.10	15.00
09/06/23	Eitan Kagedan	Fulton County: Review and analyze Petitioners' post-hearing filing; conference with R. Wiygul regarding same.	0.70	210.00
09/06/23	Robert Wiygul	Fulton County: Review Fulton County's closing arguments and objections; email to clients regarding same.	0.60	264.00
09/07/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.40 0.20	-176.00 88.00
09/07/23	Robert Wiygul	Fulton County: Telephone conference with S. Kirkpatrick regarding pending SCOTUS application to stay.	0.30	132.00

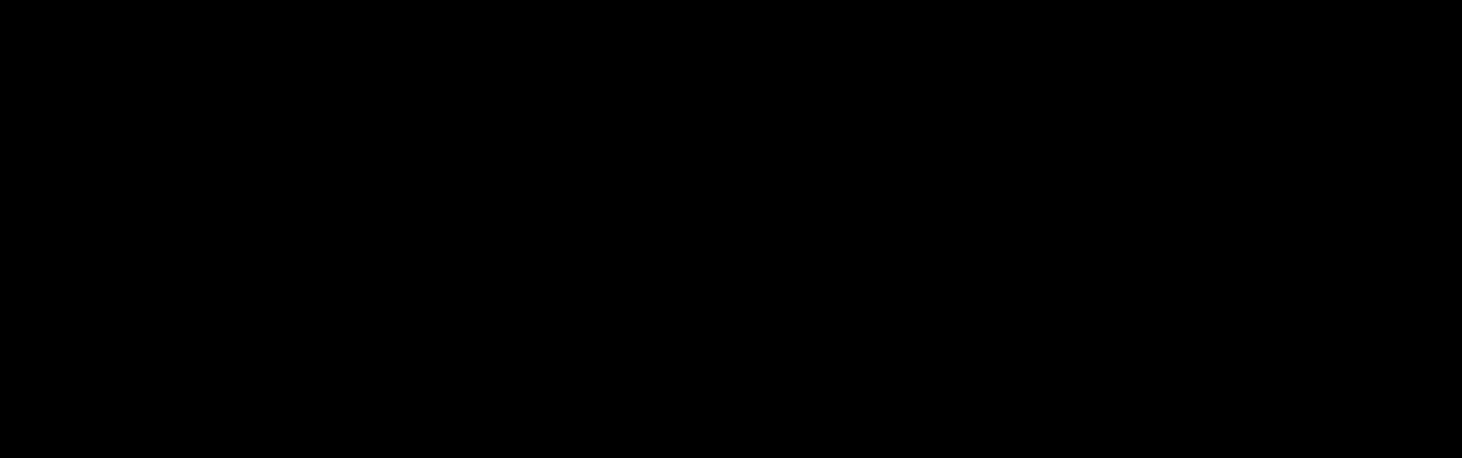
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/11/23	Robert Wiygul	Fulton County: Conference with E. Kagedan regarding research in support of compensability of fees incurred on appeal and in certiorari proceedings before SCOTUS in support of forthcoming application for fees and costs.	0.10	44.00
09/13/23	Robert Wiygul	Fulton County: Review notification that Petitioners' cert petition was distributed to the Supreme Court justices for consideration; email to clients regarding same.	0.20	88.00
09/14/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.20 0.10	---88.00--- 44.00
09/15/23	Eitan Kagedan	Fulton County: Begin review of Special Master's Memorandum Order.	0.40	120.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/15/23	Maria Hunter	Fulton County: Update matter calendar relating to Proposed Final Appointment Order executed by Pro V&V.	0.10	15.00
09/15/23	Robert Wiygul	Fulton County: Review and analyze Special Master's memorandum opinion and order; telephone conferences with E. Kagedan and J. Hill regarding same; emails to clients regarding same; emails to R. Macias and M. Walker regarding same.	2.00	880.00
09/18/23	Eitan Kagedan	Fulton County: Continue review of Special Master's Memorandum Order and consider next steps in light thereof.	2.00	600.00
09/18/23	Eitan Kagedan	Fulton County: Review edits to proposed appointment order drafted before hearing, in preparation for drafting proposed final appointment order.	0.20	60.00
09/18/23	Robert Wiygul	Fulton County: Videoconference with M. Walker (Pro V&V) to discuss Special Master's Preliminary Appointment Order and provisions of proposed final appointment order; follow-up conference with E. Kagedan regarding next steps.	1.00	440.00
09/18/23	Robert Wiygul	Fulton County: Review preliminary appointment order regarding issues to discuss with M. Walker; conference with E. Kagedan to review Memorandum Opinion and Order and prepare for conference with M. Walker.	0.70	308.00
09/19/23	Eitan Kagedan	Fulton County: Prepare for, conduct, and follow up regarding call with R. Macias concerning Special Master's Opinion and plan for proposed final appointment order.	0.70	210.00
09/19/23	Eitan Kagedan	Fulton County: Draft Proposed Final Appointment Order.	5.10	1,530.00
09/19/23	Robert Wiygul	Fulton County: Review and analyze previous draft appointment order created before hearing; conference with E. Kagedan to review current rough draft of final appointment order and discuss needed additions and revisions.	1.50	660.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/19/23	Robert Wiygul	Fulton County: Prepare for and conduct videoconference with R. Macias regarding Special Master's opinion and preliminary appointment order and drafting of proposed final appointment order.	0.60	264.00
09/19/23	Robert Wiygul	Fulton County: Emails with M. Walker regarding pricing and timeline for various security-camera features; conferences with E. Kagedan regarding same.	0.40	176.00
09/20/23	Eitan Kagedan	Fulton County: Finish drafting proposed final appointment order.	1.30	390.00
09/21/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning draft proposed final appointment order and next steps.	0.40	120.00
09/21/23	Robert Wiygul	Attend weekly conference call with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.30 0.10	132.00 44.00
09/21/23	Robert Wiygul	Fulton County: Review and revise draft of proposed final appointment order received from E. Kagedan; telephone conference with E. Kagedan regarding same.	1.10	484.00
09/25/23	Robert Wiygul	Fulton County: Emails and telephone conference with Pro V&V's outside general counsel regarding entry of appearance.	0.40	176.00
09/25/23	Robert Wiygul	Fulton County: Revise proposed final appointment order.	0.70	308.00
09/26/23	Eitan Kagedan	Fulton County: Review correspondence with Pro V&V and R. Macias concerning Final Appointment Order.	0.40	120.00
09/26/23	Eitan Kagedan	Fulton County: Draft Affidavits in Support of Proposed Final Appointment Order and discuss strategy with R. Wiygul.	1.60	480.00
09/26/23	Eitan Kagedan	Fulton County: Review revisions to Proposed Final Appointment Order.	0.40	120.00
09/26/23	Robert Wiygul	Fulton County: Begin drafting application to enter proposed final appointment order.	0.40	176.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/26/23	Robert Wiygul	Fulton County: Revise and supplement proposed final appointment order and supporting affidavits of M. Walker and W. Owens; multiple emails with M. Walker, R. Macias, and E. Kagedan regarding same; email to clients transmitting draft final appointment order.	4.50	1,980.00
09/27/23	Eitan Kagedan	Fulton County: Review correspondence concerning revisions to proposed final appointment order and review application to enter proposed order.	0.30	90.00
09/27/23	Robert Wiygul	Fulton County: Finish drafting application to enter final appointment order and revise supporting Walker affidavit and proposed final order; emails to M. Walker, R. Macias, and clients regarding same.	2.80	1,232.00
09/28/23	Eitan Kagedan	Fulton County: Review and comment on Application for Entry of Final Appointment Order, Proposed Final Appointment Order, and Affidavits in Support Thereof.	1.70	510.00
09/28/23	Eitan Kagedan	Fulton County: Draft Affidavit of R. Macias in support of Application for Entry of Proposed Final Appointment Order.	1.20	360.00
09/28/23	Robert Wiygul	Fulton County: Revise supporting Macias affidavit; communications with R. Macias regarding same; multiple rounds of revisions of application to enter proposed final appointment order and proposed order; numerous communications with Dominion's counsel, Pro V&V's counsel, R. Macias, and clients regarding same.	4.30	1,892.00
09/29/23	Eitan Kagedan	Fulton County: Review and comment on Application for entry of final order and supporting documents.	0.20	60.00
09/29/23	Robert Wiygul	Fulton County: Review and comment on revised Macias affidavit in support of Application to Enter Proposed Final Appointment Order; emails with R. Macias regarding same.	0.30	132.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/29/23	Robert Wiygul	Fulton County: Email and telephone communications with counsel for Dominion regarding description of equipment to be escrowed in proposed order and amendment to lease agreement between Dominion and Fulton County; email and telephone communications with Pro V&V's counsel and R. Macias, respectively, regarding same; emails with clients regarding need to seek extension of time to submit proposed final appointment order; draft, revise, and file joint application for extension of time; emails with clients and Dominion's counsel regarding same.	3.90	1,716.00
09/29/23	Robert Wiygul	Fulton County: Review and incorporate H. Weinstein's comments on proposed final appointment order.	0.50	220.00



November 28, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40126865

Statement of services rendered and costs incurred through October 31, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/02/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning approach to revising proposed final appointment order.	0.20	60.00
10/02/23	Eitan Kagedan	Fulton County: Review correspondence from R. Macias concerning itemization of equipment to be escrowed for purposes of drafting proposed final appointment order.	0.20	60.00
10/02/23	Maria Hunter	Fulton County: Review of Order granting Application for Extension of Time to File Proposed Final Appointment Order, and update matter calendar regarding same.	0.10	15.00
10/02/23	Robert Wiygul	Fulton County: Review order granting extension of time to file proposed final appointment order; emails with R. Macias, clients, and Dominion regarding specific equipment provided to Fulton County.	0.50	220.00
10/02/23	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding specific equipment in Fulton County's possession and authentication of amendment to Fulton County's contract with Dominion, in preparation for drafting application to enter proposed final appointment order.	0.40	176.00
10/03/23	Eitan Kagedan	Fulton County: Review drafting and negotiation history of Inspection Protocol Agreement for specific machines that would be made available for inspection, in preparation for drafting proposed final appointment order.	1.30	390.00

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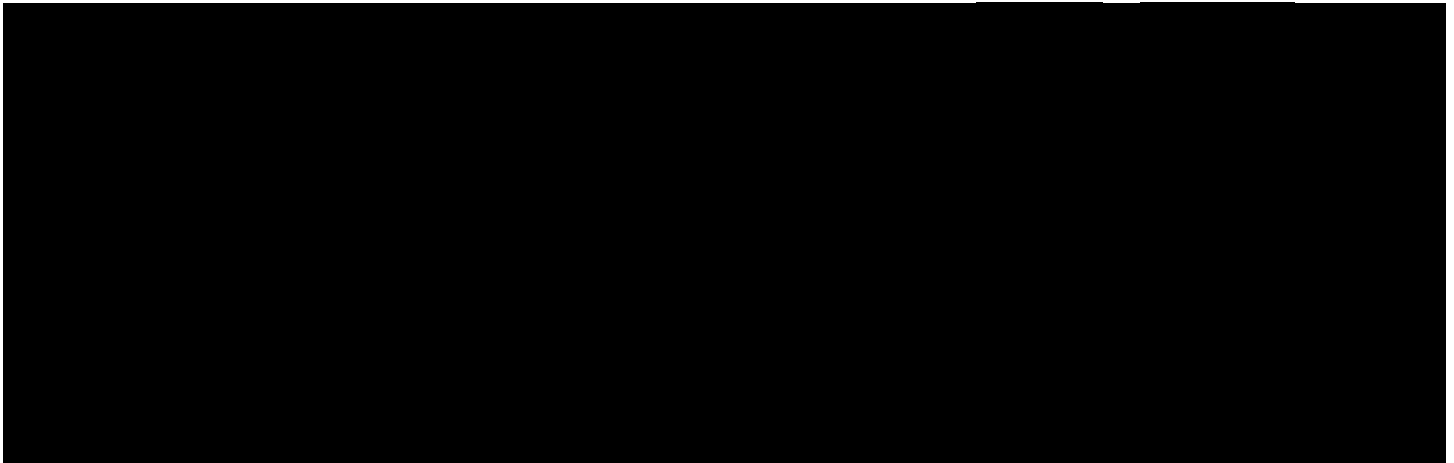
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/04/23	Robert Wiygul	Fulton County: Telephone conference with K. Goldman regarding documentation identifying specific equipment currently in Fulton County's possession, in support of proposed final appointment order.	0.50	220.00
10/05/23	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning application for entry of final appointment order.	0.20	60.00
10/05/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.40 0.10	--176.00-- 44.00
10/05/23	Robert Wiygul	Fulton County: Telephone conference with H. Weinstein regarding her research regarding compensability of time spent at cert-petition stage in support of forthcoming fee application.	0.30	132.00
10/06/23	Robert Wiygul	Fulton County: Communications with Dominion's counsel regarding February 2020 amendment to contract with Fulton County; revise proposed final appointment order to conform to equipment list and include footnote disclaimer by Pro V&V; emails with Pro V&V's counsel and clients regarding same.	1.10	484.00
10/10/23	Eitan Kagedan	Fulton County: Review correspondence concerning denial of Petitioners' Petition for Cert.	0.10	30.00
10/10/23	Eitan Kagedan	Fulton County: Finalize all details concerning Application for Entry of Final Appointment Order.	2.10	630.00
10/10/23	Maria Hunter	Fulton County: Finalize and file Application to Enter Proposed Final Appointment Order.	0.30	45.00
10/10/23	Robert Wiygul	Fulton County: Revise application to enter final appointment order; emails with team, clients, and Pro V&V's counsel regarding same.	0.90	396.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/10/23	Robert Wiygul	Fulton County: Communications with K. Goldman (Dominion) re authentication of amendment to list of equipment to accompany application to enter final appointment order.	0.10	44.00
10/11/23	Maria Hunter	Fulton County: Communications regarding archival copy of filing for Court.	0.10	15.00
10/12/23	Robert Wiygul	Attend weekly videoconference with clients, SUDC, and OAG to discuss status of Fulton County case and related matters.	-0.30 0.10	--132.00-- 44.00
10/15/23	Robert Wiygul	Fulton County: Review email from T. Carroll requesting extension of time to submit Petitioners' response to proposed final appointment order; email to clients regarding same.	0.30	132.00
10/16/23	Robert Wiygul	Fulton County: Conference with E. Kagedan regarding Petitioners' request for extension of deadline to respond to Proposed Final Appointment Order; emails with clients regarding same; draft and send response email to Petitioners' counsel.	0.60	264.00
10/17/23	Eitan Kagedan	Fulton County: Review petitioners' filing concerning appointment of escrow agent.	0.90	270.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/17/23	Robert Wiygul	Fulton County: Telephone conferences with Pro V&V's counsel regarding Pro V&V's retention of Pennsylvania counsel and entry of appearance.	0.40	176.00
10/17/23	Robert Wiygul	Fulton County: Review and analyze Petitioners' response to proposed final appointment order.	0.40	176.00
10/19/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	-0.30 0.10	--132.00-- 44.00
10/19/23	Robert Wiygul	Fulton County: Draft reply to Petitioners' Response to Proposed Final Appointment Order.	1.20	528.00
10/20/23	Eitan Kagedan	Fulton County: Review draft reply in support of Application for Entry of Final Appointment Order.	0.30	90.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/20/23	Maria Hunter	Fulton County: Review, revise, and finalize Reply in Support of Application to Enter Proposed Final Appointment Order.	0.70	105.00
10/20/23	Robert Wiygul	Fulton County: Finish drafting reply in support of Proposed Final Appointment Order; emails with team and clients regarding same; revise and finalize same.	1.30	572.00
10/23/23	Robert Wiygul	Fulton County: Email to clients regarding filing of reply brief in support of application to enter proposed final appointment order.	0.10	44.00
10/27/23	Robert Wiygul	Fulton County: Review and analyze final appointment order and accompanying memorandum opinion; emails to clients, R. Jones and C. Woods (Pro V&V's counsel), and R. Macias regarding same.	1.00	440.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



December 20, 2023

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40127315

Statement of services rendered and costs incurred through November 30, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/02/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.40 0.10	-176.00 44.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/06/23	Robert Wiygul	Fulton County: Telephone conference with C. Woods (counsel for Pro V&V) regarding his entry of appearance and final appointment order.	0.20	88.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/09/23	Robert Wiygul	Attend weekly videoconference meeting with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.30 0.10	-132.00 44.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/22/23	Robert Wiygul	Fulton County: Emails to R. Macias, clients, and K. Goldman (Dominion's counsel) regarding scheduling of Pro V&V's pickup of electronic voting equipment.	0.30	132.00
11/27/23	Eitan Kagedan	Fulton County: Review Petitioners' Application for Relief.	0.40	120.00
11/27/23	Robert Wiygul	Fulton County: Preliminary review and analysis of Petitioners' SCOPA application challenging Special Master's Final Appointment Order.	0.30	132.00
11/27/23	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding scheduling of election equipment pickup by Pro V&V.	0.30	132.00
11/28/23	Maria Hunter	Fulton County: Review of letter from Supreme Court Prothonotary regarding Response to Application for Relief and Review of Appointment Order and Memorandum Opinion and calendar response deadline.	0.10	15.00
11/28/23	Robert Wiygul	Fulton County: Thorough review and analysis of Petitioners' SCOPA application challenging Final Appointment Order and formulate responsive arguments.	0.80	352.00
11/29/23	Eitan Kagedan	Fulton County: Review and consider response to email correspondence from T. Carroll.	0.10	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/29/23	Robert Wiygul	Fulton County: Communications with Dominion's counsel regarding Pro V&V's pickup of voting equipment; draft email to C. Woods proposing pickup dates and requesting Pro V&V's and Fulton County's availability.	0.60	264.00
11/29/23	Robert Wiygul	Fulton County: Review T. Carroll's email requesting stay of payment of Pro V&V's fees; emails with clients regarding same; email T. Carroll with Secretary's position.	0.30	132.00
11/30/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	-0.50 0.10	-220.00 44.00

January 18, 2024

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40127698

Statement of services rendered and costs incurred through December 31, 2023:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/03/23	Robert Wiygul	Fulton County: Begin drafting brief in opposition to Petitioners' application for SCOPA review of Final Appointment Order.	0.50	220.00
12/04/23	Maria Hunter	Fulton County: Review of time entries for time period of June through October 2023 in advance of drafting Supplemental Fee Application.	1.60	240.00
12/05/23	Eitan Kagedan	Fulton County: Review correspondence with T. Carroll concerning transfer to escrow agent.	0.10	30.00
12/05/23	Robert Wiygul	Fulton County: Email to T. Carroll regarding scheduling of Pro V&V's pick up of voting equipment.	0.30	132.00
12/05/23	Robert Wiygul	Fulton County: Email to R. Macias with status update regarding scheduling of Pro V&V's pickup of Fulton County's election equipment.	0.20	88.00

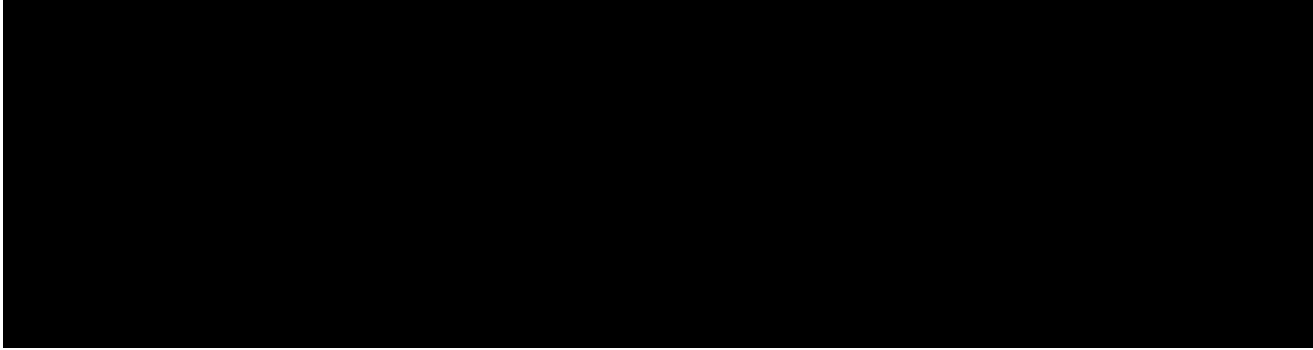
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/06/23	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning escrow transfer.	0.10	30.00
12/06/23	Maria Hunter	Fulton County: Continued review of invoices and costs, and update chart of fees for Supplemental Fee Application.	1.50	225.00
12/06/23	Robert Wiygul	Fulton County: Draft brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	3.60	1,584.00
12/07/23	Maria Hunter	Fulton County: Continued review, categorization and identification of time entries and costs for inclusion in Supplemental Fee Application.	3.40	510.00
12/07/23	Robert Wiygul	Fulton County: Continue drafting brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	6.90	3,036.00
12/08/23	Maria Hunter	Fulton County: Review and update costs in chart tracking time and costs, in advance of drafting Supplemental Fee Application.	1.30	195.00
12/08/23	Robert Wiygul	Fulton County: Continue drafting brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	11.00	4,840.00
12/10/23	Maria Hunter	Fulton County: Review and update references to case law and pleadings relied upon in Response to Petitioners' SCOPA Application.	2.70	405.00
12/11/23	Eitan Kagedan	Fulton County: Review draft Response to Petitioners' SCOPA application.	0.30	90.00
12/11/23	Maria Hunter	Fulton County: Review and update exhibits in support of Opposition to Application for Relief.	0.30	45.00
12/11/23	Maria Hunter	Fulton County: Review, update, finalize and submit Opposition to Application for Relief.	0.90	135.00
12/11/23	Robert Wiygul	Fulton County: Review team's and client's comments on response to Petitioners' SCOPA application challenging Final Appointment Order; revise and finalize same.	2.80	1,232.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/12/23	Eitan Kagedan	Fulton County: Review draft Status Report to Special Master.	0.30	90.00
12/12/23	Robert Wiygul	Fulton County: Draft Notice to Special Master regarding arrangements to transfer custody of voting equipment to Pro V&V.	1.20	528.00
12/12/23	Robert Wiygul	Fulton County: Review E. Kagedan's comments on draft notice to Special Master regarding status of voting equipment pickup arrangements and revise same; emails with E. Kagedan regarding same.	0.30	132.00
12/12/23	Robert Wiygul	Fulton County: Telephone conferences with K. Goldman (Dominion) and C. Woods (Pro V&V) regarding scheduling pickup of election equipment.	0.30	132.00
12/13/23	Maria Hunter	Fulton County: Review and update Secretary's Notice to Special Master regarding Arrangements to Transfer Voting Equipment.	0.30	45.00
12/13/23	Robert Wiygul	Fulton County: Emails with clients and team regarding notice to Special Master regarding status of arrangements to pick up voting equipment.	0.20	88.00
12/14/23	Maria Hunter	Fulton County: Review of draft chart of time entries and costs in advance of submission of Supplemental Fee Application.	1.20	180.00
12/14/23	Maria Hunter	Fulton County: Review, update, finalize and submit Notice to Special Master regarding Status of Arrangements to Transfer Voting Equipment.	0.30	45.00
12/14/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.30	132.00
12/14/23	Robert Wiygul	Fulton County: Telephone conference with M. Hunter regarding exhibit to second supplemental application for fees itemizing and describing reimbursable costs.	0.10	44.00
12/14/23	Robert Wiygul	Fulton County: Emails with client regarding Notice to Special Master regarding Transfer Date; finalize same for filing.	0.10	44.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/18/23	Maria Hunter	Fulton County: Review and update chart of costs for inclusion in Supplemental Fee Application.	0.20	30.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/19/23	Eitan Kagedan	Fulton County: Begin identifying costs and fees for inclusion in supplemental fee application.	1.70	510.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/19/23	Maria Hunter	Fulton County: Review and update chart of time entries and costs, and supporting materials, in advance of drafting Supplemental Fee Application.	1.60	240.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/20/23	Eitan Kagedan	Fulton County: Review correspondence from R. Wiygul concerning fee application.	0.10	30.00
12/20/23	Eitan Kagedan	Fulton County: Continue work identifying and categorizing compensable fee entries.	1.50	450.00
12/20/23	Maria Hunter	Fulton County: Review and update chart of fees and costs for inclusion in Supplemental Fee Application.	0.70	105.00
12/20/23	Robert Wiygul	Fulton County: Review and revise spreadsheet of time entries from 6/1/2023 through 10/31/2023 to identify time compensable under SCOPA's sanctions order, in support of second supplemental application for fees; email to M. Hunter and E. Kagedan regarding same.	1.20	528.00
12/21/23	Maria Hunter	Fulton County: Communications with counsel regarding inclusion of November entries in current Supplemental Fee Application.	0.10	15.00
12/21/23	Maria Hunter	Fulton County: Review and update chart of time entries and costs to include November invoice in advance of drafting Supplemental Fee Application.	0.30	45.00
12/21/23	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.60	264.00
12/21/23	Robert Wiygul	Fulton County: Telephone calls with C. Woods and K. Goldman regarding schedule for Pro V&V's pick up of election equipment.	0.30	132.00
12/22/23	Robert Wiygul	Draft and revise application regarding transfer date for pickup of voting equipment; emails with E. Kagedan and clients regarding same.	1.70	748.00
12/26/23	Robert Wiygul	Revise application to set Transfer Date; emails with clients regarding same.	0.60	264.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/27/23	Robert Wiygul	Fulton County: Further revise application to set Transfer Date based on New Jersey Supreme Court's denial of request to adjourn January 16-17 oral argument.	0.20	88.00
12/28/23	Robert Wiygul	Fulton County: Telephone conference with C. Woods regarding status of installation of remote-monitoring equipment.	0.30	132.00
12/28/23	Robert Wiygul	Attend weekly videoconference with clients and OAG to discuss status of Fulton County case and related matters.	0.20	88.00
12/29/23	Robert Wiygul	Fulton County: Review email from C. Woods regarding installation of remote-monitoring equipment; revise, finalize, and file application regarding date for Pro V&V's pickup of voting equipment.	0.40	176.00



February 8, 2024

Kathleen Kotula, Chief Counsel
Commonwealth of Pennsylvania
Department of State
306 North Office Building
Harrisburg, PA 17101

Client: 28000 Commonwealth of Pennsylvania
Commonwealth of Pennsylvania
Matter: 049 Election Review Advice
OGC-2021-GLEC-04
Invoice # 40128216

Statement of services rendered and costs incurred through January 31, 2024:

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/02/24	Eitan Kagedan	Fulton County: Review Order on Application Regarding the Date to Transfer Custody of Voting Equipment.	0.10	30.00
01/02/24	Eitan Kagedan	Fulton County: Add detail to descriptions of costs for supplemental fee application.	1.20	360.00
01/02/24	Eitan Kagedan	Fulton County: Allocate November time among three categories for supplemental fee application and complete addition of detail to cost portion of spreadsheet.	0.70	210.00
01/02/24	Maria Hunter	Fulton County: Review for calendaring purposes of Order scheduling Petitioners' Answer to Application regarding Date to Transfer Custody of Voting Equipment.	0.10	15.00
01/02/24	Robert Wiygul	Fulton County: Review Special Master's Order on application to schedule Transfer Date; email to clients regarding same.	0.20	88.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/03/24	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning transfer date and correspondence concerning proposed response thereto.	0.30	90.00
01/03/24	Maria Hunter	Fulton County: Communications with counsel regarding addition of December time to draft Application for Fees.	0.10	15.00
01/03/24	Robert Wiygul	Fulton County: Review T. Carroll's email requesting extension of time to respond to Secretary's application regarding transfer date; emails with clients regarding same; email response to T. Carroll.	0.20	88.00
01/04/24	Eitan Kagedan	Fulton County: Review Dominion correspondence concerning Petitioners' request for extension.	0.10	30.00
01/04/24	Eitan Kagedan	Fulton County: Continue adding detail for fee application.	1.60	480.00
01/04/24	Maria Hunter	Fulton County: Review and update Chart of Time Entries and Costs for inclusion in Supplement Fee Application.	0.80	120.00
01/04/24	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.40 0.10	176.00 44.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/04/24	Robert Wiygul	Fulton County: Email to R. Macias regarding status of scheduling Pro V&V's pickup of voting equipment.	0.10	44.00
01/05/24	Eitan Kagedan	Fulton County: Review correspondence concerning Petitioners' Application.	0.20	60.00
01/05/24	Eitan Kagedan	Fulton County: Review Petitioners' Motion for an Extension of the Time to Respond to the Secretary's Application regarding the Date to Transfer Custody of Voting Equipment.	0.20	60.00
01/05/24	Eitan Kagedan	Fulton County: Confer with R. Wiygul and formulate strategy regarding Petitioners' application for extension of time to respond to motion scheduling voting-machine transfer.	0.40	120.00
01/05/24	Eitan Kagedan	Fulton County: Telephone conference with S. Gallagher concerning Petitioners' Application.	0.20	60.00
01/05/24	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning Petitioners' Application.	0.20	60.00
01/05/24	Eitan Kagedan	Fulton County: Review Order filed.	0.10	30.00
01/05/24	Eitan Kagedan	Fulton County: Continue revising and supplementing cost and fees spreadsheet in support of fee application, including conferring with R. Wiygul, and drafting correspondence to R. Macias, and H. Weinstein concerning same.	2.30	690.00
01/05/24	Maria Hunter	Fulton County: Review and update chart of time entries and costs for inclusion in Supplemental Fee Application, including by adding time entries for December.	0.90	135.00
01/05/24	Maria Hunter	Fulton County: Review for calendaring purposes of Order Extending Time for Petitioners to Answer Application regarding Date to Transfer Custody of Voting Equipment.	0.10	15.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/05/24	Robert Wiygul	Fulton County: Review and analyze Petitioners' application for extension of time to respond to Secretary's application to set transfer date; telephone conference with E. Kagedan regarding strategy; email to clients regarding Petitioners' application and strategy.	0.60	264.00
01/05/24	Robert Wiygul	Fulton County: Review Order extending Petitioners' time to respond to Secretary's Application regarding Transfer Date; email to clients regarding same.	0.20	88.00
01/06/24	Eitan Kagedan	Fulton County: Review correspondence from T. Carroll concerning application for extension.	0.10	30.00
01/06/24	Robert Wiygul	Fulton County: Review and revise updated versions of exhibits (now including time entries from November and December 2023) to Second Supplemental fee application itemizing and describing compensable fees and costs and breaking them out into various categories.	1.20	528.00
01/06/24	Robert Wiygul	Fulton County: Begin drafting second supplemental application for award of fees and costs; related research regarding compensability of certain categories of fees.	3.40	1,496.00
01/07/24	Eitan Kagedan	Fulton County: Review and respond to R. Macias correspondence concerning affidavit in support of fee application.	0.20	60.00
01/07/24	Eitan Kagedan	Fulton County: Review correspondence from R. Wiygul concerning fee and cost designations.	0.10	30.00
01/08/24	Eitan Kagedan	Fulton County: Review and confer regarding Petitioners' filing seeking additional extension of time to respond to application to schedule transfer of custody.	0.30	90.00
01/08/24	Eitan Kagedan	Fulton County: Draft Macias affidavit in support of second supplemental fee application.	1.90	570.00
01/08/24	Eitan Kagedan	Fulton County: Draft affidavits of H. Weinstein, C. Pratt, and K. Bompadre in support of second supplemental fee application.	1.10	330.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/08/24	Eitan Kagedan	Fulton County: Review R. Wiygul edits to spreadsheet of compensable fees and costs.	0.40	120.00
01/08/24	Robert Wiygul	Fulton County: Email to R. Macias with update on scheduling of voting equipment pickup and request for telephone conference to discuss dispositive motion.	0.20	88.00
01/08/24	Robert Wiygul	Fulton County: Review Petitioners' second request for extension of time to respond to Secretary's application to schedule Transfer Date; email to clients regarding same.	0.20	88.00
01/08/24	Robert Wiygul	Fulton County: Review, revise and supplement draft affidavits of C. Pratt, K. Bompadre, and R. Macias in support of second supplemental application for fees and costs; draft affidavit of R. Wiygul in support of same; email to E. Kagedan identifying questions and discussing next steps.	2.30	1,012.00
01/09/24	Eitan Kagedan	Fulton County: Review Order setting transfer date, and related correspondence.	0.30	90.00
01/09/24	Eitan Kagedan	Fulton County: Review and respond to R. Wiygul comments to draft affidavits in support of second supplemental fee application.	0.60	180.00
01/09/24	Eitan Kagedan	Fulton County: Review H. Weinstein additions to affidavit in support of fee application.	0.40	120.00
01/10/24	Eitan Kagedan	Fulton County: Draft correspondence to timekeepers to secure signatures on affidavits in support of second supplemental fee petition.	0.20	60.00
01/10/24	Eitan Kagedan	Fulton County: Review correspondence concerning confirmation of costs paid for supplemental fee petition.	0.10	30.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/10/24	Maria Hunter	Fulton County: Communications with accounting regarding payment status of invoices in advance of submission of Second Supplemental Application for Fees and Costs.	0.10	15.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/11/24	Eitan Kagedan	Fulton County: Revise Macias affidavit in support of supplemental fee application and circulate revised version for signature.	0.30	90.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/11/24	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.30 0.10	132.00 44.00
01/11/24	Robert Wiygul	Fulton County: Telephone conference with Dominion's counsel regarding schedule for pickup of voting equipment and contingency plans in event of Petitioners' non-compliance.	0.40	176.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/11/24	Robert Wiygul	Fulton County: Telephone conference with Pro V&V's counsel regarding timing of equipment pickup.	0.20	88.00
01/12/24	Robert Wiygul	Fulton County: Telephone call to Pro V&V's counsel regarding logistics of voting equipment pickup; email to counsel confirming January 19 Transfer Date and seeking confirmation of start time and location.	0.40	176.00
01/12/24	Robert Wiygul	Fulton County: Videoconference with clients and OGC regarding response to Dominion's application for relief and related issues.	0.30	132.00
01/12/24	Robert Wiygul	Fulton County: Continue drafting second supplemental application for an award of fees and costs.	0.80	352.00
01/15/24	Robert Wiygul	Fulton County: Draft status report regarding Transfer Date of Voting Equipment and letter to Special Master regarding her availability for a telephone conference on the Transfer Date.	0.50	220.00
01/15/24	Robert Wiygul	Fulton County: Finish drafting Second Supplemental Application for fees and costs.	1.00	440.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/16/24	Eitan Kagedan	Fulton County: Review correspondence with T. Carroll concerning extension of time for dispositive motions.	0.10	30.00
01/16/24	Maria Hunter	Fulton County: Review and update Status Report to be submitted pursuant to Court Order.	0.50	75.00
01/16/24	Maria Hunter	Fulton County: Review and update correspondence to Judge Jubelirer regarding transfer of election equipment.	0.20	30.00
01/16/24	Robert Wiygul	Fulton County: Revise status report re Transfer Date and letter to Special Master regarding availability for a telephone conference; email to clients regarding same.	0.30	132.00
01/16/24	Robert Wiygul	Fulton County: Revise second supplemental fee application; email to clients regarding same.	0.40	176.00
01/17/24	Robert Wiygul	Fulton County: Review Special Master's Order granting leave to contact the Special Master during the transfer of the voting equipment to Pro V&V; emails to clients and H. Weinstein regarding same.	0.40	176.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/18/24	Eitan Kagedan	Fulton County: Follow up with H. Weinstein concerning affidavit in support of supplemental fee application.	0.10	30.00
01/18/24	Eitan Kagedan	Fulton County: Provide additional detail on redactions for research charges in support of supplemental fee application.	0.90	270.00
01/18/24	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning equipment transfer and fee petition.	0.20	60.00
01/18/24	Eitan Kagedan	Fulton County: Review draft supplemental fee application.	0.20	60.00
01/18/24	Maria Hunter	Fulton County: Review and redact confidential and personal information contained in cost back up for inclusion in Second Supplemental Fee Application.	2.80	420.00
01/18/24	Maria Hunter	Fulton County: Review and redact non-compensable time entries and annotate certain time entries for inclusion in Second Supplemental Fee Application.	1.80	270.00
01/18/24	Robert Wiygul	Fulton County: Prepare for transfer of Voting Equipment by reviewing pertinent orders and drafting email to Special Master providing notice that transfer has commenced.	0.60	264.00
01/18/24	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.30 0.10	132.00 44.00
01/18/24	Robert Wiygul	Fulton County: Communications with E. Kagedan and M. Hunter regarding finalizing second supplemental application for fees and costs; review proposed redactions to documentation of costs; review affidavit of H. Weinstein in support of application.	0.70	308.00
01/18/24	Robert Wiygul	Fulton County: Telephone conference with H. Weinstein regarding trip to Fulton County and weather.	0.10	44.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/19/24	Eitan Kagedan	Fulton County: Confirm accuracy and suggest revisions to cost backups in support of supplemental fee petition.	0.60	180.00
01/19/24	Maria Hunter	Fulton County: Review and update redactions to legal research back-up for inclusion in Second Supplemental Fee Application.	0.20	30.00
01/19/24	Robert Wiygul	Fulton County: Attend Pro V&V's inventorying and pickup of Dominion voting equipment in Fulton County (including round-trip travel between Philadelphia and Fulton County).	12.50	5,500.00
01/20/24	Robert Wiygul	Fulton County: Review inventory documents from Pro V&V; login to video surveillance and review video from secondary inventorying process; draft lengthy emails to clients regarding Pro V&V's pickup of voting equipment.	0.90	396.00
01/22/24	Eitan Kagedan	Fulton County: Review proposed redactions for backups in support of supplemental fee petition.	1.70	510.00
01/22/24	Maria Hunter	Fulton County: Review and update redaction to costs for inclusion in Second Supplemental Fee Application.	0.20	30.00
01/22/24	Robert Wiygul	Fulton County: Revise Wiygul affidavit in support of second supplemental fee application; revise and supplement application in response to client comments.	1.60	704.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/23/24	Eitan Kagedan	Fulton County: Review draft supplemental application for fees and Wiygul affidavit in support thereof.	0.90	270.00
01/23/24	Eitan Kagedan	Fulton County: Review and confirm accuracy of figures in Supplemental Fee Petition.	1.00	300.00
01/23/24	Maria Hunter	Fulton County: Review and update redactions to costs for inclusion in Second Supplemental Fee Application.	1.50	225.00
01/23/24	Maria Hunter	Fulton County: Review and update references to case law, pleadings and documents relied upon in Second Supplemental Fee Application.	1.20	180.00
01/23/24	Maria Hunter	Fulton County: Review and update chart of time entries and costs for inclusion in Second Supplemental Fee Application.	0.50	75.00
01/23/24	Robert Wiygul	Fulton County: Review near-final version of spreadsheets and exhibits in support of Second Supplemental Application for fees; email to M. Hunter regarding revisions to same; revise Second Supplemental Application per M. Hunter's comments.	0.60	264.00
01/24/24	Eitan Kagedan	Fulton County: Review revisions to Fee Application and supporting documents.	0.40	120.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/24/24	Maria Hunter	Fulton County: Continued review and redactions of confidential and non-compensable items listed in invoices, in advance for inclusion in Second Supplemental Fee Application.	0.90	135.00
01/24/24	Maria Hunter	Fulton County: Review and update chart of time entries and costs to include required summaries and data for inclusion in Second Supplemental Fee Application.	0.90	135.00
01/25/24	Eitan Kagedan	Fulton County: Confer with R. Wiygul concerning recommendation regarding timing of fee petition filing.	0.10	30.00
01/25/24	Robert Wiygul	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.30 0.10	132.00 44.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/25/24	Robert Wiygul	Fulton County: Revise second supplemental application for fees and costs and email updated draft to clients with questions.	0.40	176.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



EXHIBIT B

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124341	06/01/23	Kagedan, Eitan	Fulton County: Reach out to representative from [REDACTED] to inquire about willingness to serve as escrow agent.	0.5	150.00
40124341	06/01/23	Wiygul, Robert	Fulton County: Telephone call and emails with [REDACTED] regarding potential escrow services; follow-up email to [REDACTED] regarding same.	0.4	176.00
40124341	06/01/23	Wiygul, Robert	Fulton County: Telephone conference and email with [REDACTED] representative regarding potential escrow services; email to Pro V&V with update on discussion with County and status report to Court.	0.5	220.00
40124341	06/01/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.1	44.00
40124341	06/02/23	Kagedan, Eitan	Fulton County: Review and comment on draft letter to T. Carroll concerning escrow issues.	0.3	90.00
40124341	06/02/23	Hunter, Maria	Fulton County: Review of Order granting Leave to File Supplemental Application for Fees, and update matter calendar with relevant deadlines.	0.1	15.00
40124341	06/02/23	Wiygul, Robert	Fulton County: Draft letter to Petitioners' counsel in response to T. Carroll's letter dated May 29; review order from Special Master; email to clients regarding draft letter and order; emails with M. Fischer regarding edits to letter; revise, finalize, and transmit letter to Petitioners' counsel.	1.7	748.00
40124341	06/05/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning updates to escrow agent search and plan for supplemental fee petition.	0.2	60.00
40124341	06/05/23	Kagedan, Eitan	Fulton County: Draft Affidavit of R. Macias in support of Supplemental Fee Application.	0.6	180.00
40124341	06/05/23	Wiygul, Robert	Fulton County: Emails with [REDACTED] regarding prospective escrow services; email to clients regarding discussions with potential escrow agents.	0.4	176.00
650706	06/05/23	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding collection and production of TLG invoices for submission in supplemental application for attorneys' fees.	0.1	44.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding escrow-agent issues.	0.3	132.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Revise affidavit of Ryan Macias in support of supplemental fee application; email to R. Macias regarding same; draft affidavit of D. Mavroudis in support of supplemental fee application; email to D. Mavroudis regarding same; draft affidavit of R. Wiygul in support of supplemental fee application.	0.9	396.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Email with [REDACTED] scheduling call to discuss escrow issues.	0.1	44.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Draft supplemental application for fees and costs.	2.4	1,056.00
40124341	06/07/23	Kagedan, Eitan	Fulton County: Review, revise, and comment on draft supplemental fee application and affidavit of R. Wiygul in support thereof.	1.0	300.00
40124341	06/07/23	Kagedan, Eitan	Fulton County: Review R. Macias edits to draft affidavit in support of supplemental application.	0.1	30.00
40124341	06/07/23	Hunter, Maria	Fulton County: Review of Hangley Aronchick Segal Pudlin & Schiller's invoice for May 2023, and draft chart of fees and costs in support of Supplemental Application for Fees and Costs.	1.9	285.00
40124341	06/07/23	Hunter, Maria	Fulton County: Review of D. Mavroudis Affidavit in support of Supplemental Application for Fees and Costs, and prepare exhibit in support.	0.2	30.00
40124341	06/07/23	Hunter, Maria	Fulton County: Redact personal information and time entries not being submitted for recovery in Supplemental Application for Fees and Costs.	0.3	45.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Email to [REDACTED] to schedule call regarding potential escrow services.	0.1	44.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Analyze May 2023 invoice to identify time entries that are not compensable under the Pa. Supreme Court's order and entries that are only partially compensable, in support of supplemental application for costs and fees.	0.3	132.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Telephone conference with R. Macias regarding potential escrow agents and affidavit in support of supplemental fee application; review and revise updated Macias affidavit and email R. Macias regarding same.	0.5	220.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Revise supplemental application for fees and supporting Wiygul Affidavit; email to clients regarding same.	0.9	396.00
40124341	06/08/23	Kagedan, Eitan	Fulton County: Review and suggest edits on fee and cost backups for supplemental application.	0.6	180.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124341	06/08/23	Hunter, Maria	Fulton County: Review and update references to case law and pleadings relied upon in Supplemental Application for Fees and Costs.	0.4	60.00
40124341	06/08/23	Hunter, Maria	Fulton County: Review and redact non-reimbursable costs in advance of finalizing Supplemental Application for Fees and Costs.	0.1	15.00
40124341	06/08/23	Wiygul, Robert	Weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	0.1	44.00
40124341	06/08/23	Wiygul, Robert	Fulton County: Videoconference with [REDACTED] regarding potential escrow services.	0.3	132.00
40124341	06/08/23	Wiygul, Robert	Fulton County: Review and revise drafts of Exhibits B and C to Wiygul affidavit in support of supplemental application for fees and costs.	0.3	132.00
40124341	06/09/23	Kagedan, Eitan	Review redactions to time entries and confirm calculations in support of supplemental fee petition.	1.0	300.00
40124341	06/09/23	Hunter, Maria	Fulton County: Review invoice for entries relating to non-compensable work in advance of finalizing Supplemental Application for Fees and Costs.	0.2	30.00
40124341	06/09/23	Hunter, Maria	Fulton County: Review and update exhibits in support of Supplemental Application for Fees and Costs.	0.9	135.00
40124341	06/09/23	Hunter, Maria	Fulton County: Review, update, finalize and file The Secretary's Supplemental Application for an Award of Fees and Costs Pursuant to The Special Master's Order Dated June 2, 2023.	0.8	120.00
40124341	06/09/23	Wiygul, Robert	Fulton County: Revise and finalize supplemental application for award of costs and fees; communications with M. Hunter regarding same.	0.8	352.00
40124341	06/12/23	Kagedan, Eitan	Fulton County: Review correspondence concerning updates to escrow search.	0.1	30.00
40124341	06/12/23	Wiygul, Robert	Fulton County: Email to clients providing status update on escrow-agent issues and proposing strategy for submission of joint status report and next steps.	0.5	220.00
40124341	06/13/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning escrow agent selection.	0.2	60.00
40124341	06/13/23	Hunter, Maria	Fulton County: Communications with Clerk of Commonwealth Court regarding Praeipce to Amend.	0.1	15.00
40124341	06/13/23	Hunter, Maria	Fulton County: Draft Praeipce to Attach Amended Exhibit to Supplemental Application for Award of Fees and Costs.	0.3	45.00
40124341	06/13/23	Hunter, Maria	Fulton County: Prepare Amended Exhibit C to Supplemental Application.	0.1	15.00
40124341	06/13/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Praeipce to Attach Amended Exhibit to Supplemental Application.	0.3	45.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Telephone conference with M. Fischer regarding potential escrow agents, joint status report due to Special Master, and next steps.	0.2	88.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Review and analyze letter from T. Carroll proposing another escrow-agent candidate; emails with R. Macias and clients regarding escrow-agent issues.	0.4	176.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Draft praecipce to substitute corrected exhibit to supplemental application for fees and costs; emails with clients and team regarding same.	1.0	440.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Emails with [REDACTED] regarding terms of potential escrow-agent agreement.	0.2	88.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Conduct comprehensive review of Petition for Writ of Certiorari.	1.3	390.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Review draft status report and response to T. Carroll letter.	0.2	60.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Assess potential escrow agents, including investigation into agents proposed by Petitioners and outreach to additional potential agents.	1.1	330.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning Joint Stipulation.	0.1	30.00
40124341	06/14/23	Hunter, Maria	Fulton County: Review, update, finalize and file Joint Status Report.	0.3	45.00
40124341	06/14/23	Wiygul, Robert	Fulton County: Research Supreme Court dockets and Supreme Court Rules and draft letter in response to T. Carroll's letter from June 13; draft proposed joint status report; email to clients regarding same; telephone call to S. Gallagher (Dominion) regarding joint status report.	1.7	748.00
40124341	06/14/23	Wiygul, Robert	Fulton County: Online research regarding escrow agents proposed by Petitioners; communications with team regarding additional research and investigation of proposed escrow agents.	1.0	440.00
40124341	06/15/23	Kagedan, Eitan	Fulton County: Continue efforts to assess potential escrow agent Insurance Evidence Services (IES), including discussions with representative from IES, review of IES materials, and conferring with R. Wiygul concerning same.	1.4	420.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124341	06/15/23	Hunter, Maria	Fulton County: Review of Joint Status Report and update matter calendar with deadline for submission of Supplemental Report.	0.1	15.00
40124341	06/19/23	Hunter, Maria	Fulton County: Research regarding social media presence for Cerberus Dynamic Solutions, Insurance Evidence Services and executives for each.	2.3	345.00
40124341	06/20/23	Kagedan, Eitan	Fulton County: Review due diligence materials concerning potential escrow agents.	0.3	90.00
40124341	06/22/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning updates to Escrow Agent search and negotiation and review materials supplied by prospective escrow agents.	0.9	270.00
40124341	06/22/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.1	44.00
40124341	06/22/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding potential escrow agents and upcoming report to Court; telephone conference with E. Kagedan regarding information received from potential escrow agent.	0.9	396.00
40124341	06/27/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning request for additional time to submit joint recommendation to the Special Master.	0.1	30.00
40124341	06/27/23	Kagedan, Eitan	Fulton County: Review correspondence from R. Wiygul concerning updates to escrow search.	0.2	60.00
40124341	06/27/23	Wiygul, Robert	Fulton County: Draft long, detailed email to clients proposed strategy for June 28 joint status report, providing information about another potential escrow agent (IES), and discussing strategy for prospective application to appoint escrow agent.	1.3	572.00
40124341	06/28/23	Kagedan, Eitan	Fulton County: Review correspondence from court.	0.1	30.00
40124341	06/28/23	Hunter, Maria	Fulton County: Review, update, finalize and file Joint Status Report.	0.1	15.00
40124341	06/28/23	Wiygul, Robert	Fulton County: Draft status report regarding escrow-agent discussion; emails with clients and counsel for Petitioners and Dominion regarding same; finalize status report for filing.	0.7	308.00
40124341	06/29/23	Hunter, Maria	Fulton County: Review of Order directing further Status Report, and update matter calendar.	0.1	15.00
40124341	06/29/23	Wiygul, Robert	Participate in weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40124341	06/29/23	Wiygul, Robert	Fulton County: Review Special Master's order setting deadline for submission of applications to appoint escrow agent and email clients regarding same.	0.1	44.00
40124957	07/03/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning Application for Appointment of Escrow Agent and follow up concerning same.	0.6	180.00
40124957	07/03/23	Kagedan, Eitan	Fulton County: Begin drafting Affidavit of R. Macias in Support of Application for Appointment of Escrow Agent.	0.4	120.00
40124957	07/05/23	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding R. Macias affidavit in support of application to appoint escrow agent.	0.3	132.00
40124957	07/06/23	Kagedan, Eitan	Fulton County: Draft R. Macias Affidavit in Support of Application for Appointment of Escrow Agent and confer with R. Macias concerning same.	1.7	510.00
40124957	07/06/23	Wiygul, Robert	Fulton County: Email to clients regarding Insurance Evidence Services as potential escrow agent.	0.2	88.00
40124957	07/07/23	Kagedan, Eitan	Fulton County: Finish drafting Affidavit of R. Macias in support of Application for Appointment of Escrow Agent.	2.5	750.00
40124957	07/11/23	Kagedan, Eitan	Fulton County: Prepare for and conduct client call concerning application to appoint escrow agent.	0.7	210.00
40124957	07/11/23	Kagedan, Eitan	Fulton County: Follow up with IES concerning potential escrow services.	0.4	120.00
40124957	07/11/23	Wiygul, Robert	Fulton County: Prepare for and participate in videoconference with clients regarding application to appoint escrow agent and potential second-choice candidate; telephone conference with E. Kagedan regarding next steps.	0.8	352.00
40124957	07/12/23	Kagedan, Eitan	Fulton County: Prepare for, conduct, and follow up regarding conference with IES concerning potential escrow services.	0.5	150.00
40124957	07/12/23	Kagedan, Eitan	Fulton County: Review and respond to R. Wiygul comments on draft R. Macias Affidavit in support of Application to Appoint Escrow Agent; draft email to R. Macias concerning same.	1.0	300.00
40124957	07/12/23	Wiygul, Robert	Fulton County: Review and comment on E. Kagedan's draft of R. Macias affidavit in support of application to appoint escrow agent.	0.8	352.00
40124957	07/12/23	Wiygul, Robert	Fulton County: Prepare for and conduct telephone conference with IES representative regarding potential escrow services; pre- and post-call communications with E. Kagedan regarding next steps.	0.5	220.00
40124957	07/13/23	Kagedan, Eitan	Fulton County: Revise Affidavit of R. Macias in support of Application to Appoint Escrow Agent.	0.8	240.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124957	07/13/23	Kagedan, Eitan	Fulton County: Draft technical argument portion of Application to Appoint Escrow Agent concerning Pro V&V's qualifications.	3.3	990.00
40124957	07/13/23	Wiygul, Robert	Fulton County: Emails with client regarding follow-up conference with IES (potential escrow agent) representative.	0.2	88.00
40124957	07/14/23	Kagedan, Eitan	Fulton County: Complete draft of argument section of Application to Appoint Escrow Agent and revisions to Macias Affidavit in support thereof.	1.8	540.00
40124957	07/17/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning strategy for application to appoint escrow agent.	0.5	150.00
40124957	07/17/23	Wiygul, Robert	Fulton County: Revise affidavit of R. Macias in support of application to appoint escrow agent; revise draft of argument section of application and draft other portions of application; conference with E. Kagedan regarding same.	1.4	616.00
40124957	07/18/23	Kagedan, Eitan	Fulton County: Review Petitioners' petition for certiorari.	0.4	120.00
40124957	07/18/23	Kagedan, Eitan	Fulton County: Review correspondence concerning potential escrow agent IES.	0.2	60.00
40124957	07/18/23	Kagedan, Eitan	Fulton County: Review draft motion for extension of time to submit application to appoint escrow agent.	0.3	90.00
40124957	07/18/23	Hunter, Maria	Fulton County: Review, update, finalize, and submit Application for Extension to Submit Filing.	0.2	30.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Draft letter to counsel for other parties proposing IES as alternative escrow agent; email to counsel for other parties regarding IES and extension of 7/19/23 deadline for parties' submission to Special Master; draft application for extension of time; emails with T. Carroll regarding Petitioners' position on extension request; revise and finalize application for extension.	2.4	1,056.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Email to clients transmitting Petitioners' petition for writ of certiorari.	0.2	88.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding application to appoint escrow agent.	0.2	88.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Continue revising and supplementing draft of application to appoint escrow agent.	2.1	924.00
40124957	07/19/23	Kagedan, Eitan	Fulton County: Review Order granting Application for Extension of Time.	0.1	30.00
40124957	07/19/23	Hunter, Maria	Fulton County: Review of Order granting Motion for Extension and update matter calendar.	0.1	15.00
40124957	07/20/23	Kagedan, Eitan	Fulton County: Confer with R. Macias concerning Application to Appoint Escrow Agent.	0.4	120.00
40124957	07/20/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40124957	07/26/23	Kagedan, Eitan	Fulton County: Revise Macias affidavit in support of application to appoint escrow agent.	0.7	210.00
40124957	07/26/23	Wiygul, Robert	Fulton County: Continue drafting factual background section of application to appoint escrow agent.	1.1	484.00
40124957	07/27/23	Kagedan, Eitan	Fulton County: Consider and develop response to correspondence from T. Carroll concerning potential escrow agents.	0.4	120.00
40124957	07/27/23	Kagedan, Eitan	Fulton County: Revise Macias affidavit in support of application to appoint escrow agent.	0.4	120.00
40124957	07/27/23	Kagedan, Eitan	Fulton County: Review and comment on draft application to appoint escrow agent.	1.1	330.00
40124957	07/27/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40124957	07/27/23	Wiygul, Robert	Fulton County: Finish drafting factual background section and revising argument section of application to appoint escrow agent; telephone conferences with E. Kagedan regarding same; email to clients regarding same.	6.2	2,728.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Conduct outreach to IES concerning additional questions from Petitioners' counsel.	0.2	60.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Draft Affidavit of R. Wiygul in support of Application to Appoint Escrow Agent.	1.6	480.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Revise affidavits and application in light of change in IES position.	1.5	450.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Review Dominion's application for relief.	0.9	270.00
40124957	07/28/23	Bompadre, Kristine	Fulton County: Review, edit, finalize, and file Secretary's Application to Appoint Escrow Agent.	3.1	465.00
40124957	07/28/23	Wiygul, Robert	Fulton County: Communications with T. Carroll, S. Gallagher, E. Kagedan, and clients regarding IES's withdrawal as escrow-agent candidate; telephone conference with Pro V&V regarding status of escrow-agent selection process; revise and finalize application to appoint escrow agent and supporting affidavits and exhibits; communications with team regarding same.	3.9	1,716.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124957	07/29/23	Wiygul, Robert	Fulton County: Review Petitioners' filing regarding appointment of escrow agent; investigate authors of affidavits attached to same; emails with R. Macias regarding Petitioners' filing; email to clients transmitting Petitioners' filing.	1.3	572.00
40124957	07/31/23	Kagedan, Eitan	Fulton County: Review and consider response to Petitioners' Application.	2.0	600.00
40124957	07/31/23	Wiygul, Robert	Fulton County: Emails with K. Kotula and D. Mavroudis regarding Petitioners' application to appoint escrow agent and a potential response.	0.2	88.00
40124957	07/31/23	Wiygul, Robert	Fulton County: Close review of Petitioners' escrow-agent submission; telephone conference and in-person conference with E. Kagedan regarding response to Petitioners' application to appoint escrow agent; review email from R. Macias regarding Petitioners' application.	1.2	528.00
40125561	08/01/23	Kagedan, Eitan	Fulton County: Review correspondence with R. Macias and with clients concerning Petitioners' Application to appoint escrow agent.	0.4	120.00
40125561	08/01/23	Wiygul, Robert	Fulton County: Research caselaw in support of potential motion to strike Petitioners' affidavits.	0.5	220.00
651058	08/01/23	Mavroudis, Dimitri	Review correspondence from R. Wiygul regarding Petitioners' affidavits and strategy for seeking to strike from the record.	0.3	132.00
40125561	08/03/23	Kagedan, Eitan	Fulton County: Review Scheduling Order setting evidentiary hearing and consider strategy and next steps.	0.8	240.00
40125561	08/03/23	Kagedan, Eitan	Fulton County: Research scope of power to compel attendance of witness via notice to attend, to determine applicability to various potential Fulton County witnesses (2.0 hours spent).	1.2	360.00
40125561	08/03/23	Hunter, Maria	Fulton County: Review of Scheduling Order relating to Third Party Neutral Escrow Agent and calendar deadlines.	0.3	45.00
40125561	08/03/23	Wiygul, Robert	Fulton County: Review Special Master's order scheduling evidentiary hearing on appointment of escrow agent; analyze evidentiary and strategic issues regarding same; telephone conferences with E. Kagedan and D. Mavroudis regarding hearing and strategy; email to R. Macias regarding his availability for hearing; email to clients regarding Special Master's scheduling order.	1.0	440.00
40125561	08/03/23	Wiygul, Robert	Fulton County: Research Cerberus and its principal, Joseph Sabia, in preparation for evidentiary hearing.	0.9	396.00
40125561	08/03/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
651058	08/03/23	Mavroudis, Dimitri	Conference call with R. Wiygul regarding hearing strategy.	0.2	88.00
40125561	08/04/23	Hunter, Maria	Fulton County: Review of U.S. Supreme Court docket report and update matter calendar with relevant response date.	0.1	15.00
40125561	08/04/23	Wiygul, Robert	Fulton County: Review and analyze Petitioners' cert petition and SCOTUS rules regarding conference dates; email clients regarding same.	0.7	308.00
40125561	08/04/23	Wiygul, Robert	Fulton County: Begin comprehensive review of file for potential evidentiary-hearing exhibits and identify need for further investigation regarding potential hearing exhibits.	2.3	1,012.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Confer with Dominion's counsel concerning evidentiary hearing.	0.3	90.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Confer with clients to develop strategy for evidentiary hearing.	0.6	180.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning strategy for evidentiary hearing.	0.3	90.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Identify potential exhibits for evidentiary hearing.	1.4	420.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Review and respond to correspondence from R. Wiygul concerning potential exhibits for evidentiary hearing.	0.2	60.00
40125561	08/07/23	Hunter, Maria	Fulton County: Research regarding criminal indictments filed in Oakland County, Michigan, relating to People v. Matthew Deparno, case number 2023-285729-FH; People v. Daire Rendon, case number 2023-285730-FH; and People vs. Stefanie Lambert Junttila, case number 2023-285759-FH, in the Sixth Judicial Circuit Court of Oakland County, in preparation for evidentiary hearing.	0.7	105.00
40125561	08/07/23	Hunter, Maria	Fulton County: Communications with Michigan Circuit Court Clerk regarding obtaining indictments in Criminal actions, in preparation for evidentiary hearing.	0.2	30.00
40125561	08/07/23	Hunter, Maria	Fulton County: LinkedIn research regarding J. Sabia for potential use as exhibit at Evidentiary Hearing.	0.6	90.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/07/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding strategy for evidentiary hearing and identification of potential hearing exhibits.	0.3	132.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Telephone conferences with M. Hunter regarding collecting and organizing potential evidentiary hearing exhibits.	0.3	132.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding upcoming evidentiary hearing and Petitioners' petition for writ of certiorari.	0.3	132.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Telephone call to Pro V&V regarding status update; left message.	0.1	44.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Prepare for and conduct videoconference with clients regarding strategy for evidentiary hearing and response to Petitioners' petition for writ of certiorari.	0.6	264.00
651058	08/07/23	Mavroudis, Dimitri	Microsoft Teams conference call with client and Co-counsel regarding strategy for evidentiary hearing concerning the appointment of a neutral third-party escrow agent.	0.5	220.00
40125561	08/08/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning pre-hearing filings.	0.4	120.00
40125561	08/08/23	Kagedan, Eitan	Fulton County: Begin drafting pre-hearing submission due August 14 regarding hearing witnesses and exhibits.	0.9	270.00
40125561	08/08/23	Hunter, Maria	Fulton County: Communications with Muskegon County Prosecutor regarding criminal indictments of Attorney Lambert et al.	0.1	15.00
40125561	08/08/23	Hunter, Maria	Fulton County: Draft list of proposed exhibits for use at Evidentiary Hearing.	2.1	315.00
40125561	08/08/23	Hunter, Maria	Fulton County: Research regarding Subpoenas issued in October 2022 in preparation for issuing subpoenas for upcoming evidentiary hearing.	0.2	30.00
40125561	08/08/23	Wiygul, Robert	Fulton County: Review potential hearing exhibits identified by E. Kagedan; review and identify additional potential hearing exhibits; emails with M. Hunter regarding obtaining copy of S. Lambert's indictment; conference with E. Kagedan regarding hearing exhibits, scope of R. Macias's testimony, and drafting of submission on hearing witnesses and exhibits due August 14.	1.9	836.00
40125561	08/09/23	Kagedan, Eitan	Fulton County: Prepare for and conduct conference with R. Macias concerning upcoming evidentiary hearing.	1.0	300.00
40125561	08/09/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning strategy and approach to upcoming evidentiary hearing.	0.5	150.00
40125561	08/09/23	Kagedan, Eitan	Fulton County: Draft pre-hearing submission, including offer of proof for potential witnesses and organization of potential exhibits.	1.8	540.00
40125561	08/09/23	Hunter, Maria	Fulton County: Various communications with Clerk of Commonwealth Court and contact person in Philadelphia regarding issuance of Subpoenas compelling attendance at Evidentiary Hearing.	0.2	30.00
40125561	08/09/23	Hunter, Maria	Fulton County: Draft correspondence to Commonwealth Court enclosing fee payment regarding Subpoenas and coordinate issuance of check.	0.3	45.00
40125561	08/09/23	Hunter, Maria	Fulton County: Review and update the Secretary's list of witnesses and exhibits for Evidentiary Hearing.	0.6	90.00
40125561	08/09/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding draft exhibit and witness lists and drafting of pre-hearing applications.	0.5	220.00
40125561	08/09/23	Wiygul, Robert	Fulton County: Zoom conference with R. Macias to discuss supplemental affidavit for evidentiary hearing, potential additional hearing exhibits, and scope and topics of hearing testimony.	0.9	396.00
40125561	08/09/23	Wiygul, Robert	Fulton County: Review SCOTUS docket and draft waiver of right to respond to Petitioners' petition for writ of certiorari; email to clients regarding same.	0.4	176.00
40125561	08/10/23	Kagedan, Eitan	Fulton County: Develop strategy for drafting Motions in Limine in advance of evidentiary hearing.	0.6	180.00
40125561	08/10/23	Kagedan, Eitan	Fulton County: Finish drafting pre-hearing submission concerning proposed exhibits and witnesses.	0.7	210.00
40125561	08/10/23	Kagedan, Eitan	Fulton County: Draft supplemental affidavit of R. Macias concerning Cerberus.	1.8	540.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/10/23	Wiygul, Robert	Weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Draft application for permission for Michael Walker to testify remotely via videoconference at the 8/28/23 evidentiary hearing.	1.1	484.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Email and telephone call to Michigan prosecutor seeking copy of Lambert indictment.	0.3	132.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Email M. Walker (Pro V&V) requesting documents and information in preparation for evidentiary hearing.	0.2	88.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Finalize and file waiver of right to respond to petition for writ of certiorari; email to other parties' counsel regarding same.	0.3	132.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Review and comment on draft Application for Permission for Michael Walker to Testify Remotely Via Videoconference at the Evidentiary Hearing Scheduled for August 28, 2023.	0.2	60.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Review correspondence concerning pre-hearing filings.	0.2	60.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning proposed exhibit and witness list, revise draft submission accordingly.	0.7	210.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Review correspondence concerning potential escrow agreement and consider approach to same.	0.4	120.00
40125561	08/11/23	Hunter, Maria	Fulton County: Review and update documents for potential use as exhibits at Evidentiary Hearing.	0.9	135.00
40125561	08/11/23	Hunter, Maria	Fulton County: Review and update Secretary's List of Exhibits for Evidentiary Hearing.	0.6	90.00
40125561	08/11/23	Wiygul, Robert	Fulton County: Email clients regarding model escrow-agent agreements concerning technology.	0.2	88.00
40125561	08/11/23	Wiygul, Robert	Fulton County: Revise submission containing Secretary's list of witnesses and exhibits; email to clients regarding same; revise supplemental affidavit of R. Macias; email to R. Macias regarding same; draft application of M. Walker in support of application for permission to testify remotely; email M. Walker regarding same.	2.1	924.00
40125561	08/13/23	Hunter, Maria	Fulton County: Draft Notices to Attend directed to R. Bunch, P. Shives, S. Ulsh, E. Martin and P. Hess.	0.7	105.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning pre-hearing submissions.	0.2	60.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Review and finalize pre-hearing submission regarding witnesses and exhibits.	0.9	270.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Review and revise notices to attend.	0.3	90.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Review R. Macias edits to draft supplemental affidavit.	0.2	60.00
40125561	08/14/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Witness and Exhibit List.	0.9	135.00
40125561	08/14/23	Wiygul, Robert	Fulton County: Review edits by R. Macias to his supplemental affidavit in support of application to appoint escrow agent; email to R. Macias regarding same.	0.3	132.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review petitioners' pre-hearing submission and correspondence related thereto.	1.1	330.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Draft motion in limine concerning qualification of R. Macias as expert (2.2 hours spent).	1.5	450.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review proposed hearing exhibits to ensure accuracy and completeness.	0.3	90.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review hearing transcripts from November 2022 to identify key portions to cite in support of motions in limine.	1.7	510.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll.	0.1	30.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review escrow agreements received from the Commonwealth to identify areas to potentially include in proposed agreement.	1.1	330.00
40125561	08/15/23	Hunter, Maria	Fulton County: Research regarding P. Hess and E. Martin in preparation for drafting and serving subpoenas on them for Evidentiary Hearing.	0.8	120.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/15/23	Wiygul, Robert	Fulton County: Revise, finalize, and services Notices to Attend August 28th hearing on Commissioners Ulsh, Bunch, and Shives, Director of Election Hess, and Technology Director Martin; email to Petitioners' counsel regarding same; email to counsel for Petitioners and Dominion seeking position on Secretary's request for permission to present testimony of M. Walker remotely.	0.6	264.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Review and analyze pre-hearing submission of Petitioners regarding witnesses; emails to clients and R. Macias regarding same.	0.9	396.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Telephone conference with M. Hunter regarding preparation of hearing subpoenas directed to E. Martin and P. Hess and marking of hearing exhibits.	0.2	88.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Emails to clients regarding Notices to Attend served on Petitioners' counsel and potential service of hearing subpoenas on E. Martin and P. Hess.	0.1	44.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Review R. Wiygul comments on Motion in Limine concerning expert qualification.	0.2	60.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Draft R. Macias examination outline.	1.7	510.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Prepare for and conduct call with R. Macias concerning Petitioners' pre-hearing submission.	1.4	420.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Prepare witness subpoenas.	0.8	240.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Review and comment on draft Motion in Limine concerning admission of evidence.	0.4	120.00
40125561	08/16/23	Hunter, Maria	Fulton County: Communications with Process Server regarding service of Subpoenas on P. Hess and E. Martin.	0.1	15.00
40125561	08/16/23	Hunter, Maria	Fulton County: Coordinate drafting of Subpoenas on P. Hess and E. Martin and witness fee checks.	0.5	75.00
40125561	08/16/23	Hunter, Maria	Fulton County: Draft and update cover letters directed to E. Martin and P. Hess enclosing Subpoenas for attendance at hearing.	0.3	45.00
40125561	08/16/23	Hunter, Maria	Fulton County: Draft and update cover letter to Process Server with directions on service of Subpoenas.	0.2	30.00
40125561	08/16/23	Hunter, Maria	Fulton County: Work on Subpoena package directed to E. Martin and P. Hess regarding attendance at Evidentiary Hearing.	0.8	120.00
40125561	08/16/23	Hunter, Maria	Fulton County: Various communications with Process Server regarding service of Subpoenas.	0.1	15.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Zoom conference with R. Macias regarding Petitioners' witness list and offers of proof for August 28th hearing; conference with E. Kagedan regarding motions in limine and hearing subpoenas.	1.0	440.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Review and revise document request attached to hearing subpoenas directed to Hess and Martin.	0.2	88.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Revise letters to witnesses enclosing subpoenas; revise letter to process server with service instructions; emails with team regarding same.	0.4	176.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Emails with clients regarding application to allow M. Walker to testify via videoconference at 8/28 hearing; finalize application for filing.	0.5	220.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Review and revise draft motion in limine regarding expert qualification of R. Macias.	1.1	484.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Complete research of caselaw in support of motion in limine to admit official records from government websites; draft motion in limine; emails to team and clients regarding same.	3.2	1,408.00
40125561	08/17/23	Kagedan, Eitan	Fulton County: Draft proposed order concerning appointment of escrow agent.	2.4	720.00
40125561	08/17/23	Hunter, Maria	Fulton County: Coordinate archival paper set of Secretary's filings for delivery to the Court pursuant to Court requirement.	0.1	15.00
40125561	08/17/23	Hunter, Maria	Fulton County: Review and update Secretary's Hearing exhibits in advance of Evidentiary Hearing.	1.0	150.00
40125561	08/17/23	Hunter, Maria	Fulton County: Communications with Clerk regarding Court Reporter requirement for hearing.	0.1	15.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/17/23	Hunter, Maria	Fulton County: Review and update Motion in Limine regarding Admission of Government Records.	0.5	75.00
40125561	08/17/23	Hunter, Maria	Fulton County: Review and update exhibits to Motions in Limine regarding Admission of Government Records.	1.2	180.00
40125561	08/17/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40125561	08/17/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding Petitioners' witness list and potential motions in limine.	0.2	88.00
40125561	08/17/23	Wiygul, Robert	Fulton County: Draft response to T. Carroll's email regarding Fulton County witnesses on the Secretary's witness list; telephone conferences with process server regarding service of subpoenas on E. Martin and P. Hess; email to counsel for Petitioners and Dominion transmitting copies of subpoenas.	0.6	264.00
40125561	08/17/23	Wiygul, Robert	Fulton County: Revise motions in limine and prepare for hearing; conferences with team regarding same.	1.2	528.00
40125561	08/18/23	Kagedan, Eitan	Fulton County: Review and analyze parties' motions in limine and consider next steps, including potential responses to motions, in advance of evidentiary hearing.	0.9	270.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 1 (to Exclude the Witness Testimony Proffered by Petitioners and Preclude Vexatious, Obdurate, Dilatory, and Bad-Faith Litigation Conduct).	1.3	195.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review and update exhibits to various Motions in Limine.	0.3	45.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 2 (to Qualify Ryan Macias as an Expert in Election Technology and Security).	0.5	75.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 3 (to Admit Certain Government Records into Evidence).	0.4	60.00
40125561	08/18/23	Wiygul, Robert	Fulton County: Revise and finalize motions in limine to admit government documents and qualify R. Macias as expert.	0.4	176.00
40125561	08/18/23	Wiygul, Robert	Fulton County: Draft motion in limine no. 1 to exclude Petitioners' proffered witness testimony; email to clients regarding same; revise and finalize same in response to client comments.	5.7	2,508.00
40125561	08/18/23	Wiygul, Robert	Fulton County: Review Petitioners' motion for admission pro hac vice, objection to the Secretary's witness list, and motion to stay proceedings and Dominion's objection to Petitioners' witness list; emails to clients regarding same; research case law in preparation for responding to motion to stay; research cases involving R. Newman for response to motion for admission pro hac vice.	2.9	1,276.00
40125561	08/19/23	Wiygul, Robert	Fulton County: Research case law regarding motions for stay pending disposition of petitions for writ of certiorari in preparation for responding to Petitioners' motion for stay.	0.5	220.00
40125561	08/20/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding Petitioners' filings from Friday evening and upcoming evidentiary hearing.	0.4	176.00
40125561	08/20/23	Wiygul, Robert	Fulton County: Draft answer in opposition to Petitioners' motion to stay proceedings.	2.8	1,232.00
40125561	08/20/23	Wiygul, Robert	Fulton County: Continue researching litigation history of R. Newman; draft lengthy email to clients regarding same and strategy for responding to application for admission pro hac vice.	2.3	1,012.00
40125561	08/21/23	Kagedan, Eitan	Fulton County: Review Petitioners' pre-hearing filings and review and comment on draft responses thereto.	0.2	60.00
40125561	08/21/23	Kagedan, Eitan	Fulton County: Continue drafting proposed order for appointment of escrow agent.	1.3	390.00
40125561	08/21/23	Hill, John	Fulton County: Revise pre-hearing submissions and briefs.	1.2	300.00
40125561	08/21/23	Hill, John	Fulton County: Draft outline for hearing cross examination of Fulton County's proposed escrow agent.	3.2	800.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review, update, finalize and file Answer to Motion to Stay.	1.5	225.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review of Order scheduling Pre-Hearing Telephonic Conference for calendaring.	0.1	15.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review of Order denying Fulton County's Pro Hac Vice and scheduling deadline for submission of Amended Pro Hac Vice for calendaring.	0.1	15.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review and update Answer to Petitioner's Amended Pro Hac Vice Application and prepare exhibits in support.	0.8	120.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/21/23	Hunter, Maria	Fulton County: Review, update, finalize and file Answer to Petitioners' Objection to Secretary's Witness List.	1.0	150.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Revise and finalize answer to Petitioners' motion to stay proceedings.	0.5	220.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Draft answer to Petitioners' application for admission pro hac vice of R. Newman.	4.7	2,068.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Review Petitioners' Consolidated Response to Dominion's Objections.	0.2	88.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Emails with R. Macias and M. Walker to schedule conferences to prepare for evidentiary hearing.	0.1	44.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Draft answer to Petitioners' objection to the Secretary's witness list; email to clients regarding same.	2.0	880.00
40125561	08/22/23	Hill, John	Fulton County: Participate in witness prep with R. Wiygul and proposed escrow agent (M. Walker).	2.0	500.00
40125561	08/22/23	Hill, John	Fulton County: Participate in witness prep with R. Wiygul and R. Macias.	1.0	250.00
40125561	08/22/23	Hunter, Maria	Fulton County: Review and update exhibits to Secretary's Answer to Amended Pro Hac Vice Application.	0.4	60.00
40125561	08/22/23	Hunter, Maria	Fulton County: Communications with K. Michalczyk regarding preparation and submission of archival paper copies of Secretary's filings.	0.3	45.00
40125561	08/22/23	Hunter, Maria	Fulton County: Review and update Secretary's Answer to Amended Pro Hac Vice Application.	1.0	150.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Revise answer to application pro hac vice per comments by M. Hunter and J. Hill.	0.6	264.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Revise and supplement proposed order governing escrow services; emails to team and R. Macias regarding same.	1.9	836.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Review Dominion's waiver of right to respond to Petitioners' petition for writ of certiorari; email to clients regarding same.	0.2	88.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Review Dominion's objection to Petitioners' motion for admission PHV; email to clients regarding same.	0.2	88.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Review client comments on answer to pro hac vice application; telephone conversations with J. Hill regarding edits to same; review Petitioners' amended motion for admission pro hac vice; revise and finalize answer to amended PHV application.	1.2	528.00
40125561	08/23/23	Hill, John	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.2	300.00
40125561	08/23/23	Hill, John	Fulton County: Attend telephonic pre-hearing conference with Court regarding evidentiary hearing on appointment of escrow agent.	0.9	225.00
40125561	08/23/23	Hill, John	Fulton County: Confer with R. Wiygul and M. Walker to prepare for evidentiary hearing on appointment of escrow agent.	1.2	300.00
40125561	08/23/23	Hill, John	Fulton County: Confer with R. Wiygul to prepare for evidentiary hearing on appointment of escrow agent.	0.3	75.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Review file and prepare for pre-hearing status conference; attend status conference; telephone conference with J. Hill and D. Mavroudis to debrief and discuss next steps.	2.3	1,012.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Review orders denying Petitioners' motion to stay proceedings, permitting M. Walker to testify remotely, granting the Secretary's Motion in Limine No. 2, and granting the Secretary's Motion in Limine No. 3; emails to clients regarding same; email to court staff to provide M. Walker's contact information.	0.8	352.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Review second amended application for admission pro hac vice of R. Newman; email to clients regarding same.	0.1	44.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Draft lengthy email to clients regarding pre-hearing conference before Special Master.	0.7	308.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/23/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding status conference and upcoming evidentiary hearing.	0.2	88.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Zoom conference with R. Macias to prepare for evidentiary hearing; follow-up conference with J. Hill regarding revisions to witness-examination outlines.	1.4	616.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Draft outline of M. Walker's direct examination and Zoom conference with M. Walker to prepare for evidentiary hearing.	2.5	1,100.00
651058	08/23/23	Mavroudis, Dimitri	Videoconference with M. Walker regarding hearing preparation.	1.2	528.00
651058	08/23/23	Mavroudis, Dimitri	Attend witness preparation session with expert Ryan Macias.	1.2	528.00
651058	08/23/23	Mavroudis, Dimitri	Attend pre-hearing conference call with the Court.	0.9	396.00
651058	08/23/23	Mavroudis, Dimitri	Strategy call with R. Wiygul and J. Hill regarding hearing strategy.	0.2	88.00
40125561	08/24/23	Hill, John	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.5	375.00
40125561	08/24/23	Wiygul, Robert	Fulton County: Review memoranda and orders resolving motions in limine seeking to exclude witness testimony; telephone conference with J. Hill regarding same; email to clients regarding same.	0.5	220.00
40125561	08/24/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40125561	08/24/23	Wiygul, Robert	Fulton County: Revise and supplement outline of direct examination of R. Macias; videoconference with R. Macias to prepare for hearing.	2.5	1,100.00
40125561	08/25/23	Hill, John	Fulton County: Research standard for sequestration of witnesses and draft bench memorandum regarding same.	1.8	450.00
40125561	08/25/23	Hill, John	Fulton County: Investigate and analyze impeachment material for cross-examination of County's expert witness (B. Cotton).	2.0	500.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review correspondence to Court enclosing archival paper copies of filings and identify missing documents.	0.4	60.00
40125561	08/25/23	Hunter, Maria	Fulton County: Plan and prepare for Evidentiary Hearing.	1.3	195.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review and analyze copies of prior hearing transcripts from November 2022 for potential use at Evidentiary Hearing.	1.2	180.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review Secretary's filing and draft Demonstrative Exhibit regarding Pro V&V Fees for Escrow Services.	0.4	60.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review, update, finalize and file Response to Petitioners' Application to Present Remote Testimony and New Cotton Affidavit.	1.4	210.00
40125561	08/25/23	Hunter, Maria	Fulton County: Prepare additional hearing exhibits to include in exhibit binders.	0.6	90.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Videoconference with M. Walker to prepare for hearing testimony.	1.4	616.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Review and analyze Petitioners' application to permit remote testimony of their witnesses and attached affidavits; telephone conference with J. Hill regarding same; email to clients regarding same; email to R. Macias regarding new affidavit from B. Cotton.	0.4	176.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Draft response to Petitioners' amended application to present remote witness testimony and cross-application to strike new affidavit of B. Cotton.	1.7	748.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Refine and supplement witness-examination outlines, review and annotate potential hearing exhibits, and prepare for hearing; conferences with team members regarding same.	1.5	660.00
651058	08/25/23	Mavroudis, Dimitri	Videoconference with M. Walker regarding hearing preparation.	1.4	616.00
40125561	08/26/23	Hill, John	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.0	250.00
40125561	08/26/23	Hunter, Maria	Fulton County: Prepare materials for potential use at Evidentiary Hearing.	4.0	600.00
40125561	08/26/23	Wiygul, Robert	Fulton County: Revise outline of R. Macias' direct examination; videoconference with R. Macias to prepare for evidentiary hearing.	2.0	880.00
40125561	08/26/23	Wiygul, Robert	Fulton County: Revise hearing-examination outlines for R. Macias and M. Walker; detailed review and annotation of potential hearing exhibits; review past affidavits and deposition testimony of B. Cotton in preparation for cross-examination; conferences with M. Hunter regarding potential additional hearing exhibits and preparation for hearing.	4.8	2,112.00
40125561	08/27/23	Hunter, Maria	Fulton County: Research J. Sabia for anticipated cross-examination and plan and prepare for Evidentiary Hearing.	2.7	405.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/27/23	Wiygul, Robert	Fulton County: Draft outline for examination of Fulton County witnesses.	0.8	352.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Videoconference with M. Walker to prepare for evidentiary hearing.	0.8	352.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Analyze potential avenues of cross-examination for J. Sabia and B. Cotton (including travel from Philadelphia to Harrisburg for hearing).	2.0	880.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Conference with R. Macias regarding direct examination and potential rebuttal testimony and potential testimony from B. Cotton.	1.9	836.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Continuing drafting and refining outlines for examinations of Fulton County witnesses and J. Sabia.	3.5	1,540.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Finish reviewing deposition of B. Cotton in preparation for cross-examination.	1.7	748.00
40125561	08/28/23	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning evidentiary hearing on appointment of escrow agent, including travel between Philadelphia and Harrisburg.	17.2	5,160.00
40125561	08/28/23	Hill, John	Fulton County: Travel to and from and attend hearing on appointment of escrow agent (15 hours total).	15.0	0.00
40125561	08/28/23	Hunter, Maria	Fulton County: Travel to/from Harrisburg to attend Evidentiary Hearing.	3.8	570.00
40125561	08/28/23	Hunter, Maria	Fulton County: Plan and prepare for Evidentiary Hearing.	1.7	255.00
40125561	08/28/23	Hunter, Maria	Fulton County: Attend evidentiary hearing.	10.3	1,545.00
40125561	08/28/23	Wiygul, Robert	Fulton County: Draft outlines for oral argument on motion to strike second affidavit of B. Cotton and request for sequestration of J. Sabia; prepare for and attend evidentiary hearing; conferences with team and clients regarding same (including 2.0 hours of travel from Harrisburg to Philadelphia).	12.9	5,676.00
651058	08/28/23	Mavroudis, Dimitri	Travel to/from Harrisburg to attend hearing regarding the selection of an escrow agent.	14.0	6,160.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Draft email to clients concerning sequence of remaining witness examinations.	0.3	90.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Review correspondence regarding Petitioners' cross-examination of R. Macias and consider implications for testimony of M. Walker and potential rebuttal testimony by R. Macias.	0.7	210.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Prepare for continuation of evidentiary hearing, including review of witness examination outlines and social media postings by J. Sabia.	2.4	720.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Research authority regarding taking judicial notice of content of websites in preparation for potential evidentiary arguments at hearing (2.6 hours spent).	1.9	570.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Telephone conference with M. Walker to prepare for upcoming testimony.	0.8	240.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Travel to Harrisburg for continuation of evidentiary hearings.	2.0	600.00
40125561	08/29/23	Hill, John	Fulton County: Review and collect social media posts relevant to impeachment of J. Sabia.	2.5	625.00
40125561	08/29/23	Hill, John	Fulton County: Review and collect material relevant to impeachment and voir dire of County's proposed expert witness (B. Cotton).	2.5	625.00
40125561	08/29/23	Hunter, Maria	Fulton County: Research and review of social media posts by J. Sabia in advance of cross examination at Evidentiary Hearing and prepare potential exhibits regarding same (6.6 hours spent).	4.0	600.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Train travel from Philadelphia to Harrisburg for second day of hearing, including revising and supplementing cross-examination outline for J. Sabia and emails with team regarding collecting social media posts and exhibits.	1.8	792.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Revise outline of examination of M. Walker and videoconference with M. Walker to prepare for hearing.	1.2	528.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Conference with R. Macias to prepare for cross-examination of B. Cotton and discuss potential topics of rebuttal testimony.	1.0	440.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Finish revising and supplementing outline of J. Sabia's examination and revise outline of examination of B. Cotton.	1.9	836.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/29/23	Wiygul, Robert	Fulton County: Research J. Sabia's Facebook and Twitter posts in support of cross-examination of J. Sabia; emails to clients regarding order of forthcoming witness examinations and communications with M. Walker; review Petitioners' application for reconsideration of SCOPA scheduling order.	2.9	1,276.00
40125561	08/30/23	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning evidentiary hearing on appointment of escrow agent.	11.0	3,300.00
40125561	08/30/23	Kagedan, Eitan	Fulton County: Prepare for continuation of evidentiary hearing, including researching caselaw regarding timeliness of service of subpoenas, reviewing witness examination outlines, and reviewing and commenting on draft response to applications to stay.	2.8	840.00
40125561	08/30/23	Hill, John	Fulton County: Travel to and from and attend hearing on appointment of escrow agent, including drafting of SCOPA response to Petitioners' applications to stay.	14.0	3,500.00
40125561	08/30/23	Hunter, Maria	Fulton County: Travel to Harrisburg to attend continued Evidentiary Hearing.	1.8	270.00
40125561	08/30/23	Hunter, Maria	Fulton County: Plan and prepare for continued evidentiary hearing.	1.8	270.00
40125561	08/30/23	Hunter, Maria	Fulton County: Attend continued evidentiary hearing.	8.7	1,305.00
40125561	08/30/23	Hunter, Maria	Fulton County: Review and update Answer to Fulton County's Emergency Application for a Stay upon Special Master's Denial of Same, and prepare exhibits.	1.8	270.00
40125561	08/30/23	Hunter, Maria	Fulton County: Review of proposed images regarding social media for cross examination of J. Sabia.	0.7	105.00
40125561	08/30/23	Wiygul, Robert	Fulton County: Prepare for and attend evidentiary hearing; conferences with team, clients, and R. Macias regarding same.	9.7	4,268.00
40125561	08/30/23	Wiygul, Robert	Fulton County: Review and revise and comment on draft answer to Petitioners' application seeking stay of proceedings from Pennsylvania Supreme Court.	1.0	440.00
40125561	08/31/23	Pratt, Christine	Fulton County: Review for accuracy the Response to an Emergency Application for Stay and Exhibits A - M in support thereof, obtain attorney's approval to file, and file the same in the Pa. Supreme Court.	0.9	135.00
40125561	08/31/23	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning continuation of evidentiary hearing on appointment of escrow agent, including travel from Harrisburg to Philadelphia.	12.5	3,750.00
40125561	08/31/23	Hill, John	Fulton County: Observe hearing on appointment of escrow agent (3.0 hours spent).	0	0.00
40125561	08/31/23	Hill, John	Fulton County: Revise SCOPA response to emergency application for stay.	1.0	250.00
40125561	08/31/23	Hunter, Maria	Fulton County: Plan and prepare for continued Evidentiary Hearing.	1.5	225.00
40125561	08/31/23	Hunter, Maria	Fulton County: Attend continued Evidentiary Hearing.	7.4	1,110.00
40125561	08/31/23	Hunter, Maria	Fulton County: Travel from Harrisburg to Philadelphia.	2.0	300.00
40125561	08/31/23	Wiygul, Robert	Fulton County: Revise and supplement cross-examination outline for J. Sabia and revise cross-examination outline for B. Cotton.	2.5	1,100.00
40125561	08/31/23	Wiygul, Robert	Fulton County: Prepare for and attend evidentiary hearing; conferences with team and clients regarding same.	9.7	4,268.00
40125561	08/31/23	Wiygul, Robert	Fulton County: Travel from Harrisburg to Philadelphia following hearing, including de-briefing with team and email to client about next steps en route (excluding time spent working on other matters).	1.5	660.00
40126225	09/01/23	Wiygul, Robert	Fulton County: Telephone conference with S. Kirkpatrick regarding Petitioners' SCOTUS application for stay.	0.2	88.00
40126225	09/01/23	Wiygul, Robert	Fulton County: Email to S. Kirkpatrick regarding Secretary's opposition to Petitioners' SCOPA applications to stay.	0.1	44.00
40126225	09/05/23	Hunter, Maria	Fulton County: Review of transcripts of hearing held on August 30, 2023 and August 31, 2023; communications with Court Reporter regarding transcript for hearing held on August 28, 2023.	0.1	15.00
40126225	09/06/23	Kagedan, Eitan	Fulton County: Review and analyze Petitioners' post-hearing filing; conference with R. Wiygul regarding same.	0.7	210.00
40126225	09/06/23	Wiygul, Robert	Fulton County: Review Fulton County's closing arguments and objections; email to clients regarding same.	0.6	264.00
40126225	09/07/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40126225	09/07/23	Wiygul, Robert	Fulton County: Telephone conference with S. Kirkpatrick regarding pending SCOTUS application to stay.	0.3	132.00
40126225	09/11/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding research in support of compensability of fees incurred on appeal and in certiorari proceedings before SCOTUS in support of forthcoming application for fees and costs.	0.1	44.00
40126225	09/13/23	Wiygul, Robert	Fulton County: Review notification that Petitioners' cert petition was distributed to the Supreme Court justices for consideration; email to clients regarding same.	0.2	88.00
40126225	09/14/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40126225	09/15/23	Kagedan, Eitan	Fulton County: Begin review of Special Master's Memorandum Order.	0.4	120.00
40126225	09/15/23	Hunter, Maria	Fulton County: Update matter calendar relating to Proposed Final Appointment Order executed by Pro V&V.	0.1	15.00
40126225	09/15/23	Wiygul, Robert	Fulton County: Review and analyze Special Master's memorandum opinion and order; telephone conferences with E. Kagedan and J. Hill regarding same; emails to clients regarding same; emails to R. Macias and M. Walker regarding same.	2.0	880.00
40126225	09/18/23	Kagedan, Eitan	Fulton County: Continue review of Special Master's Memorandum Order and consider next steps in light thereof.	2.0	600.00
40126225	09/18/23	Kagedan, Eitan	Fulton County: Review edits to proposed appointment order drafted before hearing, in preparation for drafting proposed final appointment order.	0.2	60.00
40126225	09/18/23	Wiygul, Robert	Fulton County: Videoconference with M. Walker (Pro V&V) to discuss Special Master's Preliminary Appointment Order and provisions of proposed final appointment order; follow-up conference with E. Kagedan regarding next steps.	1.0	440.00
40126225	09/18/23	Wiygul, Robert	Fulton County: Review preliminary appointment order regarding issues to discuss with M. Walker; conference with E. Kagedan to review Memorandum Opinion and Order and prepare for conference with M. Walker.	0.7	308.00
651276	09/18/23	Weinstein, Hillary B.	Conference with Pro V & V Program Manager regarding implementation of Supreme Court Order for voting machines.	0.9	396.00
40126225	09/19/23	Kagedan, Eitan	Fulton County: Prepare for, conduct, and follow up regarding call with R. Macias concerning Special Master's Opinion and plan for proposed final appointment order.	0.7	210.00
40126225	09/19/23	Kagedan, Eitan	Fulton County: Draft Proposed Final Appointment Order.	5.1	1,530.00
40126225	09/19/23	Wiygul, Robert	Fulton County: Review and analyze previous draft appointment order created before hearing; conference with E. Kagedan to review current rough draft of final appointment order and discuss needed additions and revisions.	1.5	660.00
40126225	09/19/23	Wiygul, Robert	Fulton County: Prepare for and conduct videoconference with R. Macias regarding Special Master's opinion and preliminary appointment order and drafting of proposed final appointment order.	0.6	264.00
40126225	09/19/23	Wiygul, Robert	Fulton County: Emails with M. Walker regarding pricing and timeline for various security-camera features; conferences with E. Kagedan regarding same.	0.4	176.00
651276	09/19/23	Weinstein, Hillary B.	Conference with expert regarding implementation of Supreme Court Order for voting machines.	0.7	308.00
40126225	09/20/23	Kagedan, Eitan	Fulton County: Finish drafting proposed final appointment order.	1.3	390.00
40126225	09/21/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning draft proposed final appointment order and next steps.	0.4	120.00
40126225	09/21/23	Wiygul, Robert	Attend weekly conference call with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40126225	09/21/23	Wiygul, Robert	Fulton County: Review and revise draft of proposed final appointment order received from E. Kagedan; telephone conference with E. Kagedan regarding same.	1.1	484.00
40126225	09/25/23	Wiygul, Robert	Fulton County: Emails and telephone conference with Pro V&V's outside general counsel regarding entry of appearance.	0.4	176.00
40126225	09/25/23	Wiygul, Robert	Fulton County: Revise proposed final appointment order.	0.7	308.00
40126225	09/26/23	Kagedan, Eitan	Fulton County: Review correspondence with Pro V&V and R. Macias concerning Final Appointment Order.	0.4	120.00
40126225	09/26/23	Kagedan, Eitan	Fulton County: Draft Affidavits in Support of Proposed Final Appointment Order and discuss strategy with R. Wiygul.	1.6	480.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40126225	09/26/23	Kagedan, Eitan	Fulton County: Review revisions to Proposed Final Appointment Order.	0.4	120.00
40126225	09/26/23	Wiygul, Robert	Fulton County: Begin drafting application to enter proposed final appointment order.	0.4	176.00
40126225	09/26/23	Wiygul, Robert	Fulton County: Revise and supplement proposed final appointment order and supporting affidavits of M. Walker and W. Owens; multiple emails with M. Walker, R. Macias, and E. Kagedan regarding same; email to clients transmitting draft final appointment order.	4.5	1,980.00
40126225	09/27/23	Kagedan, Eitan	Fulton County: Review correspondence concerning revisions to proposed final appointment order and review application to enter proposed order.	0.3	90.00
40126225	09/27/23	Wiygul, Robert	Fulton County: Finish drafting application to enter final appointment order and revise supporting Walker affidavit and proposed final order; emails to M. Walker, R. Macias, and clients regarding same.	2.8	1,232.00
40126225	09/28/23	Kagedan, Eitan	Fulton County: Review and comment on Application for Entry of Final Appointment Order, Proposed Final Appointment Order, and Affidavits in Support Thereof.	1.7	510.00
40126225	09/28/23	Kagedan, Eitan	Fulton County: Draft Affidavit of R. Macias in support of Application for Entry of Proposed Final Appointment Order.	1.2	360.00
40126225	09/28/23	Wiygul, Robert	Fulton County: Revise supporting Macias affidavit; communications with R. Macias regarding same; multiple rounds of revisions of application to enter proposed final appointment order and proposed order; numerous communications with Dominion's counsel, Pro V&V's counsel, R. Macias, and clients regarding same.	4.3	1,892.00
40126225	09/29/23	Kagedan, Eitan	Fulton County: Review and comment on Application for entry of final order and supporting documents.	0.2	60.00
40126225	09/29/23	Wiygul, Robert	Fulton County: Review and comment on revised Macias affidavit in support of Application to Enter Proposed Final Appointment Order; emails with R. Macias regarding same.	0.3	132.00
40126225	09/29/23	Wiygul, Robert	Fulton County: Email and telephone communications with counsel for Dominion regarding description of equipment to be escrowed in proposed order and amendment to lease agreement between Dominion and Fulton County; email and telephone communications with Pro V&V's counsel and R. Macias, respectively, regarding same; emails with clients regarding need to seek extension of time to submit proposed final appointment order; draft, revise, and file joint application for extension of time; emails with clients and Dominion's counsel regarding same.	3.9	1,716.00
40126225	09/29/23	Wiygul, Robert	Fulton County: Review and incorporate H. Weinstein's comments on proposed final appointment order.	0.5	220.00
651276	09/29/23	Weinstein, Hillary B.	Review of draft Order regarding storage of voting machines; correspondence with R. Wiygul regarding same.	0.4	176.00
40126865	10/02/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning approach to revising proposed final appointment order.	0.2	60.00
40126865	10/02/23	Kagedan, Eitan	Fulton County: Review correspondence from R. Macias concerning itemization of equipment to be escrowed for purposes of drafting proposed final appointment order.	0.2	60.00
40126865	10/02/23	Hunter, Maria	Fulton County: Review of Order granting Application for Extension of Time to File Proposed Final Appointment Order, and update matter calendar regarding same.	0.1	15.00
40126865	10/02/23	Wiygul, Robert	Fulton County: Review order granting extension of time to file proposed final appointment order; emails with R. Macias, clients, and Dominion regarding specific equipment provided to Fulton County.	0.5	220.00
40126865	10/02/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding specific equipment in Fulton County's possession and authentication of amendment to Fulton County's contract with Dominion, in preparation for drafting application to enter proposed final appointment order.	0.4	176.00
40126865	10/03/23	Kagedan, Eitan	Fulton County: Review drafting and negotiation history of Inspection Protocol Agreement for specific machines that would be made available for inspection, in preparation for drafting proposed final appointment order.	1.3	390.00
651406	10/03/23	Weinstein, Hillary B.	Research regarding attorneys fees warranted for defense of attorneys' fees award on appeal.	1.9	836.00
40126865	10/04/23	Wiygul, Robert	Fulton County: Telephone conference with K. Goldman regarding documentation identifying specific equipment currently in Fulton County's possession, in support of proposed final appointment order.	0.5	220.00
40126865	10/05/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning application for entry of final appointment order.	0.2	60.00
40126865	10/05/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40126865	10/05/23	Wiygul, Robert	Fulton County: Telephone conference with H. Weinstein regarding her research regarding compensability of time spent at cert-petition stage in support of forthcoming fee application.	0.3	132.00
651406	10/05/23	Weinstein, Hillary B.	Finalize research regarding ability to recover attorneys' fees on appellate matter; call with R. Wiygul regarding same.	1.5	660.00
40126865	10/06/23	Wiygul, Robert	Fulton County: Communications with Dominion's counsel regarding February 2020 amendment to contract with Fulton County; revise proposed final appointment order to conform to equipment list and include footnote disclaimer by Pro V&V; emails with Pro V&V's counsel and clients regarding same.	1.1	484.00
40126865	10/10/23	Kagedan, Eitan	Fulton County: Review correspondence concerning denial of Petitioners' Petition for Cert.	0.1	30.00
40126865	10/10/23	Kagedan, Eitan	Fulton County: Finalize all details concerning Application for Entry of Final Appointment Order.	2.1	630.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40126865	10/10/23	Hunter, Maria	Fulton County: Finalize and file Application to Enter Proposed Final Appointment Order.	0.3	45.00
40126865	10/10/23	Wiygul, Robert	Fulton County: Revise application to enter final appointment order; emails with team, clients, and Pro V&V's counsel regarding same.	0.9	396.00
40126865	10/10/23	Wiygul, Robert	Fulton County: Communications with K. Goldman (Dominion) re authentication of amendment to list of equipment to accompany application to enter final appointment order.	0.1	44.00
40126865	10/11/23	Hunter, Maria	Fulton County: Communications regarding archival copy of filing for Court.	0.1	15.00
40126865	10/12/23	Wiygul, Robert	Attend weekly videoconference with clients, SUDC, and OAG to discuss status of Fulton County case and related matters.	0.1	44.00
40126865	10/15/23	Wiygul, Robert	Fulton County: Review email from T. Carroll requesting extension of time to submit Petitioners' response to proposed final appointment order; email to clients regarding same.	0.3	132.00
40126865	10/16/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding Petitioners' request for extension of deadline to respond to Proposed Final Appointment Order; emails with clients regarding same; draft and send response email to Petitioners' counsel.	0.6	264.00
40126865	10/17/23	Kagedan, Eitan	Fulton County: Review petitioners' filing concerning appointment of escrow agent.	0.9	270.00
40126865	10/17/23	Wiygul, Robert	Fulton County: Telephone conferences with Pro V&V's counsel regarding Pro V&V's retention of Pennsylvania counsel and entry of appearance.	0.4	176.00
40126865	10/17/23	Wiygul, Robert	Fulton County: Review and analyze Petitioners' response to proposed final appointment order.	0.4	176.00
40126865	10/19/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.1	44.00
40126865	10/19/23	Wiygul, Robert	Fulton County: Draft reply to Petitioners' Response to Proposed Final Appointment Order.	1.2	528.00
40126865	10/20/23	Kagedan, Eitan	Fulton County: Review draft reply in support of Application for Entry of Final Appointment Order.	0.3	90.00
40126865	10/20/23	Hunter, Maria	Fulton County: Review, revise, and finalize Reply in Support of Application to Enter Proposed Final Appointment Order.	0.7	105.00
40126865	10/20/23	Wiygul, Robert	Fulton County: Finish drafting reply in support of Proposed Final Appointment Order; emails with team and clients regarding same; revise and finalize same.	1.3	572.00
40126865	10/23/23	Wiygul, Robert	Fulton County: Email to clients regarding filing of reply brief in support of application to enter proposed final appointment order.	0.1	44.00
40126865	10/27/23	Wiygul, Robert	Fulton County: Review and analyze final appointment order and accompanying memorandum opinion; emails to clients, R. Jones and C. Woods (Pro V&V's counsel), and R. Macias regarding same.	1.0	440.00
40127315	11/02/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40127315	11/06/23	Wiygul, Robert	Fulton County: Telephone conference with C. Woods (counsel for Pro V&V) regarding his entry of appearance and final appointment order.	0.2	88.00
40127315	11/09/23	Wiygul, Robert	Attend weekly videoconference meeting with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40127315	11/22/23	Wiygul, Robert	Fulton County: Emails to R. Macias, clients, and K. Goldman (Dominion's counsel) regarding scheduling of Pro V&V's pickup of electronic voting equipment.	0.3	132.00
40127315	11/27/23	Kagedan, Eitan	Fulton County: Review Petitioners' Application for Relief.	0.4	120.00
40127315	11/27/23	Wiygul, Robert	Fulton County: Preliminary review and analysis of Petitioners' SCOPA application challenging Special Master's Final Appointment Order.	0.3	132.00
40127315	11/27/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding scheduling of election equipment pickup by Pro V&V.	0.3	132.00
40127315	11/28/23	Hunter, Maria	Fulton County: Review of letter from Supreme Court Prothonotary regarding Response to Application for Relief and Review of Appointment Order and Memorandum Opinion and calendar response deadline.	0.1	15.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40127315	11/28/23	Wiygul, Robert	Fulton County: Thorough review and analysis of Petitioners' SCOPA application challenging Final Appointment Order and formulate responsive arguments.	0.8	352.00
40127315	11/29/23	Kagedan, Eitan	Fulton County: Review and consider response to email correspondence from T. Carroll.	0.1	30.00
40127315	11/29/23	Wiygul, Robert	Fulton County: Communications with Dominion's counsel regarding Pro V&V's pickup of voting equipment; draft email to C. Woods proposing pickup dates and requesting Pro V&V's and Fulton County's availability.	0.6	264.00
40127315	11/29/23	Wiygul, Robert	Fulton County: Review T. Carroll's email requesting stay of payment of Pro V&V's fees; emails with clients regarding same; email T. Carroll with Secretary's position.	0.3	132.00
40127315	11/30/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40127698	12/03/23	Wiygul, Robert	Fulton County: Begin drafting brief in opposition to Petitioners' application for SCOPA review of Final Appointment Order.	0.5	220.00
40127698	12/04/23	Hunter, Maria	Fulton County: Review of time entries for time period of June through October 2023 in advance of drafting Supplemental Fee Application.	1.6	240.00
40127698	12/05/23	Kagedan, Eitan	Fulton County: Review correspondence with T. Carroll concerning transfer to escrow agent.	0.1	30.00
40127698	12/05/23	Wiygul, Robert	Fulton County: Email to T. Carroll regarding scheduling of Pro V&V's pick up of voting equipment.	0.3	132.00
40127698	12/05/23	Wiygul, Robert	Fulton County: Email to R. Macias with status update regarding scheduling of Pro V&V's pickup of Fulton County's election equipment.	0.2	88.00
40127698	12/06/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning escrow transfer.	0.1	30.00
40127698	12/06/23	Hunter, Maria	Fulton County: Continued review of invoices and costs, and update chart of fees for Supplemental Fee Application.	1.5	225.00
40127698	12/06/23	Wiygul, Robert	Fulton County: Draft brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	3.6	1,584.00
40127698	12/07/23	Hunter, Maria	Fulton County: Continued review, categorization and identification of time entries and costs for inclusion in Supplemental Fee Application.	3.4	510.00
40127698	12/07/23	Wiygul, Robert	Fulton County: Continue drafting brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	6.9	3,036.00
40127698	12/08/23	Hunter, Maria	Fulton County: Review and update costs in chart tracking time and costs, in advance of drafting Supplemental Fee Application.	1.3	195.00
40127698	12/08/23	Wiygul, Robert	Fulton County: Continue drafting brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	11.0	4,840.00
40127698	12/10/23	Hunter, Maria	Fulton County: Review and update references to case law and pleadings relied upon in Response to Petitioners' SCOPA Application.	2.7	405.00
40127698	12/11/23	Kagedan, Eitan	Fulton County: Review draft Response to Petitioners' SCOPA application.	0.3	90.00
40127698	12/11/23	Hunter, Maria	Fulton County: Review and update exhibits in support of Opposition to Application for Relief.	0.3	45.00
40127698	12/11/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Opposition to Application for Relief.	0.9	135.00
40127698	12/11/23	Wiygul, Robert	Fulton County: Review team's and client's comments on response to Petitioners' SCOPA application challenging Final Appointment Order; revise and finalize same.	2.8	1,232.00
40127698	12/12/23	Kagedan, Eitan	Fulton County: Review draft Status Report to Special Master.	0.3	90.00
40127698	12/12/23	Wiygul, Robert	Fulton County: Draft Notice to Special Master regarding arrangements to transfer custody of voting equipment to Pro V&V.	1.2	528.00
40127698	12/12/23	Wiygul, Robert	Fulton County: Review E. Kagedan's comments on draft notice to Special Master regarding status of voting equipment pickup arrangements and revise same; emails with E. Kagedan regarding same.	0.3	132.00
40127698	12/12/23	Wiygul, Robert	Fulton County: Telephone conferences with K. Goldman (Dominion) and C. Woods (Pro V&V) regarding scheduling pickup of election equipment.	0.3	132.00
40127698	12/13/23	Hunter, Maria	Fulton County: Review and update Secretary's Notice to Special Master regarding Arrangements to Transfer Voting Equipment.	0.3	45.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40127698	12/13/23	Wiygul, Robert	Fulton County: Emails with clients and team regarding notice to Special Master regarding status of arrangements to pick up voting equipment.	0.2	88.00
40127698	12/14/23	Hunter, Maria	Fulton County: Review of draft chart of time entries and costs in advance of submission of Supplemental Fee Application.	1.2	180.00
40127698	12/14/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Notice to Special Master regarding Status of Arrangements to Transfer Voting Equipment.	0.3	45.00
40127698	12/14/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40127698	12/14/23	Wiygul, Robert	Fulton County: Telephone conference with M. Hunter regarding exhibit to second supplemental application for fees itemizing and describing reimbursable costs.	0.1	44.00
40127698	12/14/23	Wiygul, Robert	Fulton County: Emails with client regarding Notice to Special Master regarding Transfer Date; finalize same for filing.	0.1	44.00
40127698	12/18/23	Hunter, Maria	Fulton County: Review and update chart of costs for inclusion in Supplemental Fee Application.	0.2	30.00
40127698	12/19/23	Kagedan, Eitan	Fulton County: Begin identifying costs and fees for inclusion in supplemental fee application.	1.7	510.00
40127698	12/19/23	Hunter, Maria	Fulton County: Review and update chart of time entries and costs, and supporting materials, in advance of drafting Supplemental Fee Application.	1.6	240.00
40127698	12/19/23	Wiygul, Robert	Fulton County: Emails with R. Macias regarding scheduling of voting equipment pickup and potential affidavit in support of dispositive motion.	0.1	44.00
40127698	12/20/23	Kagedan, Eitan	Fulton County: Review correspondence from R. Wiygul concerning fee application.	0.1	30.00
40127698	12/20/23	Kagedan, Eitan	Fulton County: Continue work identifying and categorizing compensable fee entries.	1.5	450.00
40127698	12/20/23	Hunter, Maria	Fulton County: Review and update chart of fees and costs for inclusion in Supplemental Fee Application.	0.7	105.00
40127698	12/20/23	Wiygul, Robert	Fulton County: Review and revise spreadsheet of time entries from 6/1/2023 through 10/31/2023 to identify time compensable under SCOPA's sanctions order, in support of second supplemental application for fees; email to M. Hunter and E. Kagedan regarding same.	1.2	528.00
40127698	12/21/23	Hunter, Maria	Fulton County: Communications with counsel regarding inclusion of November entries in current Supplemental Fee Application.	0.1	15.00
40127698	12/21/23	Hunter, Maria	Fulton County: Review and update chart of time entries and costs to include November invoice in advance of drafting Supplemental Fee Application.	0.3	45.00
40127698	12/21/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.3	132.00
40127698	12/21/23	Wiygul, Robert	Fulton County: Telephone calls with C. Woods and K. Goldman regarding schedule for Pro V&V's pick up of election equipment.	0.3	132.00
40127698	12/22/23	Wiygul, Robert	Draft and revise application regarding transfer date for pickup of voting equipment; emails with E. Kagedan and clients regarding same.	1.7	748.00
40127698	12/26/23	Wiygul, Robert	Revise application to set Transfer Date; emails with clients regarding same.	0.6	264.00
40127698	12/27/23	Wiygul, Robert	Fulton County: Further revise application to set Transfer Date based on New Jersey Supreme Court's denial of request to adjourn January 16-17 oral argument.	0.2	88.00
40127698	12/28/23	Wiygul, Robert	Fulton County: Telephone conference with C. Woods regarding status of installation of remote-monitoring equipment.	0.3	132.00
40127698	12/28/23	Wiygul, Robert	Attend weekly videoconference with clients and OAG to discuss status of Fulton County case and related matters.	0.1	44.00
40127698	12/29/23	Wiygul, Robert	Fulton County: Review email from C. Woods regarding installation of remote-monitoring equipment; revise, finalize, and file application regarding date for Pro V&V's pickup of voting equipment.	0.4	176.00
40128216	01/02/24	Kagedan, Eitan	Fulton County: Review Order on Application Regarding the Date to Transfer Custody of Voting Equipment.	0.1	30.00
40128216	01/02/24	Kagedan, Eitan	Fulton County: Add detail to descriptions of costs for supplemental fee application.	1.2	360.00
40128216	01/02/24	Kagedan, Eitan	Fulton County: Allocate November time among three categories for supplemental fee application and complete addition of detail to cost portion of spreadsheet.	0.7	210.00
40128216	01/02/24	Hunter, Maria	Fulton County: Review for calendaring purposes of Order scheduling Petitioners' Answer to Application regarding Date to Transfer Custody of Voting Equipment.	0.1	15.00
40128216	01/02/24	Wiygul, Robert	Fulton County: Review Special Master's Order on application to schedule Transfer Date; email to clients regarding same.	0.2	88.00
40128216	01/03/24	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning transfer date and correspondence concerning proposed response thereto.	0.3	90.00
40128216	01/03/24	Hunter, Maria	Fulton County: Communications with counsel regarding addition of December time to draft Application for Fees.	0.1	15.00
40128216	01/03/24	Wiygul, Robert	Fulton County: Review T. Carroll's email requesting extension of time to respond to Secretary's application regarding transfer date; emails with clients regarding same; email response to T. Carroll.	0.2	88.00
40128216	01/04/24	Kagedan, Eitan	Fulton County: Review Dominion correspondence concerning Petitioners' request for extension.	0.1	30.00
40128216	01/04/24	Kagedan, Eitan	Fulton County: Continue adding detail for fee application.	1.6	480.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40128216	01/04/24	Hunter, Maria	Fulton County: Review and update Chart of Time Entries and Costs for inclusion in Supplement Fee Application.	0.8	120.00
40128216	01/04/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40128216	01/04/24	Wiygul, Robert	Fulton County: Email to R. Macias regarding status of scheduling Pro V&V's pickup of voting equipment.	0.1	44.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review correspondence concerning Petitioners' Application.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review Petitioners' Motion for an Extension of the Time to Respond to the Secretary's Application regarding the Date to Transfer Custody of Voting Equipment.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Confer with R. Wiygul and formulate strategy regarding Petitioners' application for extension of time to respond to motion scheduling voting-machine transfer.	0.4	120.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Telephone conference with S. Gallagher concerning Petitioners' Application.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning Petitioners' Application.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review Order filed.	0.1	30.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Continue revising and supplementing cost and fees spreadsheet in support of fee application, including conferring with R. Wiygul, and drafting correspondence to R. Macias, and H. Weinstein concerning same.	2.3	690.00
40128216	01/05/24	Hunter, Maria	Fulton County: Review and update chart of time entries and costs for inclusion in Supplemental Fee Application, including by adding time entries for December.	0.9	135.00
40128216	01/05/24	Hunter, Maria	Fulton County: Review for calendaring purposes of Order Extending Time for Petitioners to Answer Application regarding Date to Transfer Custody of Voting Equipment.	0.1	15.00
40128216	01/05/24	Wiygul, Robert	Fulton County: Review and analyze Petitioners' application for extension of time to respond to Secretary's application to set transfer date; telephone conference with E. Kagedan regarding strategy; email to clients regarding Petitioners' application and strategy.	0.6	264.00
40128216	01/05/24	Wiygul, Robert	Fulton County: Review Order extending Petitioners' time to respond to Secretary's Application regarding Transfer Date; email to clients regarding same.	0.2	88.00
40128216	01/06/24	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning application for extension.	0.1	30.00
40128216	01/06/24	Wiygul, Robert	Fulton County: Review and revise updated versions of exhibits (now including time entries from November and December 2023) to Second Supplemental fee application itemizing and describing compensable fees and costs and breaking them out into various categories.	1.2	528.00
40128216	01/06/24	Wiygul, Robert	Fulton County: Begin drafting second supplemental application for award of fees and costs; related research regarding compensability of certain categories of fees.	3.4	1,496.00
40128216	01/07/24	Kagedan, Eitan	Fulton County: Review and respond to R. Macias correspondence concerning affidavit in support of fee application.	0.2	60.00
40128216	01/07/24	Kagedan, Eitan	Fulton County: Review correspondence from R. Wiygul concerning fee and cost designations.	0.1	30.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Review and confer regarding Petitioners' filing seeking additional extension of time to respond to application to schedule transfer of custody.	0.3	90.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Draft Macias affidavit in support of second supplemental fee application.	1.9	570.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Draft affidavits of H. Weinstein, C. Pratt, and K. Bompadre in support of second supplemental fee application.	1.1	330.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Review R. Wiygul edits to spreadsheet of compensable fees and costs.	0.4	120.00
40128216	01/08/24	Wiygul, Robert	Fulton County: Email to R. Macias with update on scheduling of voting equipment pickup and request for telephone conference to discuss dispositive motion.	0.2	88.00
40128216	01/08/24	Wiygul, Robert	Fulton County: Review Petitioners' second request for extension of time to respond to Secretary's application to schedule Transfer Date; email to clients regarding same.	0.2	88.00
40128216	01/08/24	Wiygul, Robert	Fulton County: Review, revise and supplement draft affidavits of C. Pratt, K. Bompadre, and R. Macias in support of second supplemental application for fees and costs; draft affidavit of R. Wiygul in support of same; email to E. Kagedan identifying questions and discussing next steps.	2.3	1,012.00
40128216	01/09/24	Kagedan, Eitan	Fulton County: Review Order setting transfer date, and related correspondence.	0.3	90.00
40128216	01/09/24	Kagedan, Eitan	Fulton County: Review and respond to R. Wiygul comments to draft affidavits in support of second supplemental fee application.	0.6	180.00
40128216	01/09/24	Kagedan, Eitan	Fulton County: Review H. Weinstein additions to affidavit in support of fee application.	0.4	120.00
651718	01/09/24	Weinstein, Hillary B.	Draft affidavit in support of application for fees.	0.7	308.00
40128216	01/10/24	Kagedan, Eitan	Fulton County: Draft correspondence to timekeepers to secure signatures on affidavits in support of second supplemental fee petition.	0.2	60.00
40128216	01/10/24	Kagedan, Eitan	Fulton County: Review correspondence concerning confirmation of costs paid for supplemental fee petition.	0.1	30.00
40128216	01/10/24	Hunter, Maria	Fulton County: Communications with accounting regarding payment status of invoices in advance of submission of Second Supplemental Application for Fees and Costs.	0.1	15.00
651718	01/10/24	Weinstein, Hillary B.	Review filings by Fulton County and Dominion regarding transport of voting machines.	0.1	44.00
40128216	01/11/24	Kagedan, Eitan	Fulton County: Revise Macias affidavit in support of supplemental fee application and circulate revised version for signature.	0.3	90.00
40128216	01/11/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40128216	01/11/24	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding schedule for pickup of voting equipment and contingency plans in event of Petitioners' non-compliance.	0.4	176.00
40128216	01/11/24	Wiygul, Robert	Fulton County: Telephone conference with Pro V&V's counsel regarding timing of equipment pickup.	0.2	88.00
40128216	01/12/24	Wiygul, Robert	Fulton County: Telephone call to Pro V&V's counsel regarding logistics of voting equipment pickup; email to counsel confirming January 19 Transfer Date and seeking confirmation of start time and location.	0.4	176.00
40128216	01/12/24	Wiygul, Robert	Fulton County: Continue drafting second supplemental application for an award of fees and costs.	0.8	352.00
40128216	01/15/24	Wiygul, Robert	Fulton County: Draft status report regarding Transfer Date of Voting Equipment and letter to Special Master regarding her availability for a telephone conference on the Transfer Date.	0.5	220.00
40128216	01/15/24	Wiygul, Robert	Fulton County: Finish drafting Second Supplemental Application for fees and costs.	1.0	440.00
40128216	01/16/24	Kagedan, Eitan	Fulton County: Review correspondence with T. Carroll concerning equipment pickup.	0.1	30.00
40128216	01/16/24	Hunter, Maria	Fulton County: Review and update Status Report to be submitted pursuant to Court Order.	0.5	75.00
40128216	01/16/24	Hunter, Maria	Fulton County: Review and update correspondence to Judge Jubelirer regarding transfer of election equipment.	0.2	30.00
40128216	01/16/24	Wiygul, Robert	Fulton County: Revise status report re Transfer Date and letter to Special Master regarding availability for a telephone conference; email to clients regarding same.	0.3	132.00

Exhibit B - Expenditures of Legal-Professional Time

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40128216	01/16/24	Wiygul, Robert	Fulton County: Revise second supplemental fee application; email to clients regarding same.	0.4	176.00
40128216	01/17/24	Wiygul, Robert	Fulton County: Review Special Master's Order granting leave to contact the Special Master during the transfer of the voting equipment to Pro V&V; emails to clients and H. Weinstein regarding same.	0.4	176.00
651718	01/17/24	Weinstein, Hillary B.	Strategy regarding observation of Pro V&V pickup of voting machines on January 19, 2024 in Fulton County.	0.3	132.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Follow up with H. Weinstein concerning affidavit in support of supplemental fee application.	0.1	30.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Provide additional detail on redactions for research charges in support of supplemental fee application.	0.9	270.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning equipment transfer and fee petition.	0.2	60.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Review draft supplemental fee application.	0.2	60.00
40128216	01/18/24	Hunter, Maria	Fulton County: Review and redact confidential and personal information contained in cost back up for inclusion in Second Supplemental Fee Application.	2.8	420.00
40128216	01/18/24	Hunter, Maria	Fulton County: Review and redact non-compensable time entries and annotate certain time entries for inclusion in Second Supplemental Fee Application.	1.8	270.00
40128216	01/18/24	Wiygul, Robert	Fulton County: Prepare for transfer of Voting Equipment by reviewing pertinent orders and drafting email to Special Master providing notice that transfer has commenced.	0.6	264.00
40128216	01/18/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40128216	01/18/24	Wiygul, Robert	Fulton County: Communications with E. Kagedan and M. Hunter regarding finalizing second supplemental application for fees and costs; review proposed redactions to documentation of costs; review affidavit of H. Weinstein in support of application.	0.7	308.00
40128216	01/18/24	Wiygul, Robert	Fulton County: Telephone conference with H. Weinstein regarding trip to Fulton County and weather.	0.1	44.00
40128216	01/19/24	Kagedan, Eitan	Fulton County: Confirm accuracy and suggest revisions to cost backups in support of supplemental fee petition.	0.6	180.00
40128216	01/19/24	Hunter, Maria	Fulton County: Review and update redactions to legal research back-up for inclusion in Second Supplemental Fee Application.	0.2	30.00
40128216	01/19/24	Wiygul, Robert	Fulton County: Attend Pro V&V's inventorying and pickup of Dominion voting equipment in Fulton County (including round-trip travel between Philadelphia and Fulton County).	12.5	5,500.00
651718	01/19/24	Weinstein, Hillary B.	Travel to and from Fulton County to monitor transfer of voting machines to Pro V and V; monitor and observe transfer of voting machines to Pro V and V; draft correspondence to Commonwealth Court regarding transfer.	12.6	5,544.00
40128216	01/20/24	Wiygul, Robert	Fulton County: Review inventory documents from Pro V&V; login to video surveillance and review video from secondary inventorying process; draft lengthy emails to clients regarding Pro V&V's pickup of voting equipment.	0.9	396.00
40128216	01/22/24	Kagedan, Eitan	Fulton County: Review proposed redactions for backups in support of supplemental fee petition.	1.7	510.00
40128216	01/22/24	Hunter, Maria	Fulton County: Review and update redaction to costs for inclusion in Second Supplemental Fee Application.	0.2	30.00
40128216	01/22/24	Wiygul, Robert	Fulton County: Revise Wiygul affidavit in support of second supplemental fee application; revise and supplement application in response to client comments.	1.6	704.00
40128216	01/23/24	Kagedan, Eitan	Fulton County: Review draft supplemental application for fees and Wiygul affidavit in support thereof.	0.9	270.00
40128216	01/23/24	Kagedan, Eitan	Fulton County: Review and confirm accuracy of figures in Supplemental Fee Petition.	1.0	300.00
40128216	01/23/24	Hunter, Maria	Fulton County: Review and update redactions to costs for inclusion in Second Supplemental Fee Application.	1.5	225.00
40128216	01/23/24	Hunter, Maria	Fulton County: Review and update references to case law, pleadings and documents relied upon in Second Supplemental Fee Application.	1.2	180.00
40128216	01/23/24	Hunter, Maria	Fulton County: Review and update chart of time entries and costs for inclusion in Second Supplemental Fee Application.	0.5	75.00
40128216	01/23/24	Wiygul, Robert	Fulton County: Review near-final version of spreadsheets and exhibits in support of Second Supplemental Application for fees; email to M. Hunter regarding revisions to same; revise Second Supplemental Application per M. Hunter's comments.	0.6	264.00
40128216	01/24/24	Kagedan, Eitan	Fulton County: Review revisions to Fee Application and supporting documents.	0.4	120.00
40128216	01/24/24	Hunter, Maria	Fulton County: Continued review and redactions of confidential and non-compensable items listed in invoices, in advance for inclusion in Second Supplemental Fee Application.	0.9	135.00
40128216	01/24/24	Hunter, Maria	Fulton County: Review and update chart of time entries and costs to include required summaries and data for inclusion in Second Supplemental Fee Application.	0.9	135.00
40128216	01/25/24	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning recommendation regarding timing of fee petition filing.	0.1	30.00
40128216	01/25/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40128216	01/25/24	Wiygul, Robert	Fulton County: Revise second supplemental application for fees and costs and email updated draft to clients with questions.	0.4	176.00

Totals 655.00 215,925.00

Timekeeper	Hours	Amount
Wiygul, Robert	276.9	121,836.00
Kagedan, Eitan	163.7	49,110.00
Hill, John	52.3	9,325.00
Hunter, Maria	119.0	17,850.00
Pratt, Christine	0.9	135.00
Bompadre, Kristine	3.1	465.00
Mavroudis, Dimitri	20.0	8,800.00
Weinstein, Hillary B.	19.1	8,404.00

EXHIBIT C

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124341	06/01/23	Kagedan, Eitan	Fulton County: Reach out to representative from [REDACTED] to inquire about willingness to serve as escrow agent.	0.5	150.00
40124341	06/01/23	Wiygul, Robert	Fulton County: Telephone call and emails with [REDACTED] regarding potential escrow services; follow-up email to [REDACTED] regarding same.	0.4	176.00
40124341	06/01/23	Wiygul, Robert	Fulton County: Telephone conference and email with [REDACTED] representative regarding potential escrow services; email to Pro V&V with update on discussion with County and status report to Court.	0.5	220.00
40124341	06/01/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.1	44.00
40124341	06/02/23	Kagedan, Eitan	Fulton County: Review and comment on draft letter to T. Carroll concerning escrow issues.	0.3	90.00
40124341	06/02/23	Wiygul, Robert	Fulton County: Draft letter to Petitioners' counsel in response to T. Carroll's letter dated May 29; review order from Special Master; email to clients regarding draft letter and order; emails with M. Fischer regarding edits to letter; revise, finalize, and transmit letter to Petitioners' counsel.	1.7	748.00
40124341	06/05/23	Wiygul, Robert	Fulton County: Emails with [REDACTED] regarding prospective escrow services; email to clients regarding discussions with potential escrow agents.	0.4	176.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding escrow-agent issues.	0.3	132.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Email with [REDACTED] scheduling call to discuss escrow issues.	0.1	44.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Email to [REDACTED] to schedule call regarding potential escrow services.	0.1	44.00
40124341	06/08/23	Wiygul, Robert	Fulton County: Videoconference with [REDACTED] regarding potential escrow services.	0.3	132.00
40124341	06/12/23	Kagedan, Eitan	Fulton County: Review correspondence concerning updates to escrow search.	0.1	30.00
40124341	06/12/23	Wiygul, Robert	Fulton County: Email to clients providing status update on escrow-agent issues and proposing strategy for submission of joint status report and next steps.	0.5	220.00
40124341	06/13/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning escrow agent selection.	0.2	60.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Telephone conference with M. Fischer regarding potential escrow agents, joint status report due to Special Master, and next steps.	0.2	88.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Review and analyze letter from T. Carroll proposing another escrow-agent candidate; emails with R. Macias and clients regarding escrow-agent issues.	0.4	176.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Emails with [REDACTED] regarding terms of potential escrow-agent agreement.	0.2	88.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Review draft status report and response to T. Carroll letter.	0.2	60.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Assess potential escrow agents, including investigation into agents proposed by Petitioners and outreach to additional potential agents.	1.1	330.00
40124341	06/14/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning Joint Stipulation.	0.1	30.00
40124341	06/14/23	Hunter, Maria	Fulton County: Review, update, finalize and file Joint Status Report.	0.3	45.00
40124341	06/14/23	Wiygul, Robert	Fulton County: Research Supreme Court dockets and Supreme Court Rules and draft letter in response to T. Carroll's letter from June 13; draft proposed joint status report; email to clients regarding same; telephone call to S. Gallagher (Dominion) regarding joint status report.	1.7	748.00
40124341	06/14/23	Wiygul, Robert	Fulton County: Online research regarding escrow agents proposed by Petitioners; communications with team regarding additional research and investigation of proposed escrow agents.	1.0	440.00
40124341	06/15/23	Kagedan, Eitan	Fulton County: Continue efforts to assess potential escrow agent Insurance Evidence Services (IES), including discussions with representative from IES, review of IES materials, and conferring with R. Wiygul concerning same.	1.4	420.00
40124341	06/15/23	Hunter, Maria	Fulton County: Review of Joint Status Report and update matter calendar with deadline for submission of Supplemental Report.	0.1	15.00
40124341	06/19/23	Hunter, Maria	Fulton County: Research regarding social media presence for Cerberus Dynamic Solutions, Insurance Evidence Services and executives for each.	2.3	345.00
40124341	06/20/23	Kagedan, Eitan	Fulton County: Review due diligence materials concerning potential escrow agents.	0.3	90.00
40124341	06/22/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning updates to Escrow Agent search and negotiation and review materials supplied by prospective escrow agents.	0.9	270.00
40124341	06/22/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.1	44.00
40124341	06/22/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding potential escrow agents and upcoming report to Court; telephone conference with E. Kagedan regarding information received from potential escrow agent.	0.9	396.00
40124341	06/27/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning request for additional time to submit joint recommendation to the Special Master.	0.1	30.00
40124341	06/27/23	Kagedan, Eitan	Fulton County: Review correspondence from R. Wiygul concerning updates to escrow search.	0.2	60.00
40124341	06/27/23	Wiygul, Robert	Fulton County: Draft long, detailed email to clients proposed strategy for June 28 joint status report, providing information about another potential escrow agent (IES), and discussing strategy for prospective application to appoint escrow agent.	1.3	572.00
40124341	06/28/23	Kagedan, Eitan	Fulton County: Review correspondence from court.	0.1	30.00
40124341	06/28/23	Hunter, Maria	Fulton County: Review, update, finalize and file Joint Status Report.	0.1	15.00
40124341	06/28/23	Wiygul, Robert	Fulton County: Draft status report regarding escrow-agent discussion; emails with clients and counsel for Petitioners and Dominion regarding same; finalize status report for filing.	0.7	308.00
40124341	06/29/23	Hunter, Maria	Fulton County: Review of Order directing further Status Report, and update matter calendar.	0.1	15.00
40124341	06/29/23	Wiygul, Robert	Participate in weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40124341	06/29/23	Wiygul, Robert	Fulton County: Review Special Master's order setting deadline for submission of applications to appoint escrow agent and email clients regarding same.	0.1	44.00
40124957	07/03/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning Application for Appointment of Escrow Agent and follow up concerning same.	0.6	180.00
40124957	07/03/23	Kagedan, Eitan	Fulton County: Begin drafting Affidavit of R. Macias in Support of Application for Appointment of Escrow Agent.	0.4	120.00
40124957	07/05/23	Wiygul, Robert	Fulton County: Telephone conference with E. Kagedan regarding R. Macias affidavit in support of application to appoint escrow agent.	0.3	132.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124957	07/06/23	Kagedan, Eitan	Fulton County: Draft R. Macias Affidavit in Support of Application for Appointment of Escrow Agent and confer with R. Macias concerning same.	1.7	510.00
40124957	07/06/23	Wiygul, Robert	Fulton County: Email to clients regarding Insurance Evidence Services as potential escrow agent.	0.2	88.00
40124957	07/07/23	Kagedan, Eitan	Fulton County: Finish drafting Affidavit of R. Macias in support of Application for Appointment of Escrow Agent.	2.5	750.00
40124957	07/11/23	Kagedan, Eitan	Fulton County: Prepare for and conduct client call concerning application to appoint escrow agent.	0.7	210.00
40124957	07/11/23	Kagedan, Eitan	Fulton County: Follow up with IES concerning potential escrow services.	0.4	120.00
40124957	07/11/23	Wiygul, Robert	Fulton County: Prepare for and participate in videoconference with clients regarding application to appoint escrow agent and potential second-choice candidate; telephone conference with E. Kagedan regarding next steps.	0.8	352.00
40124957	07/12/23	Kagedan, Eitan	Fulton County: Prepare for, conduct, and follow up regarding conference with IES concerning potential escrow services.	0.5	150.00
40124957	07/12/23	Kagedan, Eitan	Fulton County: Review and respond to R. Wiygul comments on draft R. Macias Affidavit in support of Application to Appoint Escrow Agent; draft email to R. Macias concerning same.	1.0	300.00
40124957	07/12/23	Wiygul, Robert	Fulton County: Review and comment on E. Kagedan's draft of R. Macias affidavit in support of application to appoint escrow agent.	0.8	352.00
40124957	07/12/23	Wiygul, Robert	Fulton County: Prepare for and conduct telephone conference with IES representative regarding potential escrow services; pre- and post-call communications with E. Kagedan regarding next steps.	0.5	220.00
40124957	07/13/23	Kagedan, Eitan	Fulton County: Revise Affidavit of R. Macias in support of Application to Appoint Escrow Agent.	0.8	240.00
40124957	07/13/23	Kagedan, Eitan	Fulton County: Draft technical argument portion of Application to Appoint Escrow Agent concerning Pro V&V's qualifications.	3.3	990.00
40124957	07/13/23	Wiygul, Robert	Fulton County: Emails with client regarding follow-up conference with IES (potential escrow agent) representative.	0.2	88.00
40124957	07/14/23	Kagedan, Eitan	Fulton County: Complete draft of argument section of Application to Appoint Escrow Agent and revisions to Macias Affidavit in support thereof.	1.8	540.00
40124957	07/17/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning strategy for application to appoint escrow agent.	0.5	150.00
40124957	07/17/23	Wiygul, Robert	Fulton County: Revise affidavit of R. Macias in support of application to appoint escrow agent; revise draft of argument section of application and draft other portions of application; conference with E. Kagedan regarding same.	1.4	616.00
40124957	07/18/23	Kagedan, Eitan	Fulton County: Review correspondence concerning potential escrow agent IES.	0.2	60.00
40124957	07/18/23	Kagedan, Eitan	Fulton County: Review draft motion for extension of time to submit application to appoint escrow agent.	0.3	90.00
40124957	07/18/23	Hunter, Maria	Fulton County: Review, update, finalize, and submit Application for Extension to Submit Filing.	0.2	30.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Draft letter to counsel for other parties proposing IES as alternative escrow agent; email to counsel for other parties regarding IES and extension of 7/19/23 deadline for parties' submission to Special Master; draft application for extension of time; emails with T. Carroll regarding Petitioners' position on extension request; revise and finalize application for extension.	2.4	1,056.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion's counsel) regarding application to appoint escrow agent.	0.2	88.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Continue revising and supplementing draft of application to appoint escrow agent.	2.1	924.00
40124957	07/19/23	Kagedan, Eitan	Fulton County: Review Order granting Application for Extension of Time.	0.1	30.00
40124957	07/19/23	Hunter, Maria	Fulton County: Review of Order granting Motion for Extension and update matter calendar.	0.1	15.00
40124957	07/20/23	Kagedan, Eitan	Fulton County: Confer with R. Macias concerning Application to Appoint Escrow Agent.	0.4	120.00
40124957	07/20/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40124957	07/26/23	Kagedan, Eitan	Fulton County: Revise Macias affidavit in support of application to appoint escrow agent.	0.7	210.00
40124957	07/26/23	Wiygul, Robert	Fulton County: Continue drafting factual background section of application to appoint escrow agent.	1.1	484.00
40124957	07/27/23	Kagedan, Eitan	Fulton County: Consider and develop response to correspondence from T. Carroll concerning potential escrow agents.	0.4	120.00
40124957	07/27/23	Kagedan, Eitan	Fulton County: Revise Macias affidavit in support of application to appoint escrow agent.	0.4	120.00
40124957	07/27/23	Kagedan, Eitan	Fulton County: Review and comment on draft application to appoint escrow agent.	1.1	330.00
40124957	07/27/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40124957	07/27/23	Wiygul, Robert	Fulton County: Finish drafting factual background section and revising argument section of application to appoint escrow agent; telephone conferences with E. Kagedan regarding same; email to clients regarding same.	6.2	2,728.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Conduct outreach to IES concerning additional questions from Petitioners' counsel.	0.2	60.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Draft Affidavit of R. Wiygul in support of Application to Appoint Escrow Agent.	1.6	480.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Revise affidavits and application in light of change in IES position.	1.5	450.00
40124957	07/28/23	Kagedan, Eitan	Fulton County: Review Dominion's application for relief.	0.9	270.00
40124957	07/28/23	Bompadre, Kristine	Fulton County: Review, edit, finalize, and file Secretary's Application to Appoint Escrow Agent.	3.1	465.00
40124957	07/28/23	Wiygul, Robert	Fulton County: Communications with T. Carroll, S. Gallagher, E. Kagedan, and clients regarding IES's withdrawal as escrow-agent candidate; telephone conference with Pro V&V regarding status of escrow-agent selection process; revise and finalize application to appoint escrow agent and supporting affidavits and exhibits; communications with team regarding same.	3.9	1,716.00
40124957	07/29/23	Wiygul, Robert	Fulton County: Review Petitioners' filing regarding appointment of escrow agent; investigate authors of affidavits attached to same; emails with R. Macias regarding Petitioners' filing; email to clients transmitting Petitioners' filing.	1.3	572.00
40124957	07/31/23	Kagedan, Eitan	Fulton County: Review and consider response to Petitioners' Application.	2.0	600.00
40124957	07/31/23	Wiygul, Robert	Fulton County: Emails with K. Kotula and D. Mavroudis regarding Petitioners' application to appoint escrow agent and a potential response.	0.2	88.00
40124957	07/31/23	Wiygul, Robert	Fulton County: Close review of Petitioners' escrow-agent submission; telephone conference and in-person conference with E. Kagedan regarding response to Petitioners' application to appoint escrow agent; review email from R. Macias regarding Petitioners' application.	1.2	528.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/01/23	Kagedan, Eitan	Fulton County: Review correspondence with R. Macias and with clients concerning Petitioners' Application to appoint escrow agent.	0.4	120.00
40125561	08/01/23	Wiygul, Robert	Fulton County: Research caselaw in support of potential motion to strike Petitioners' affidavits.	0.5	220.00
651058	08/01/23	Mavroudis, Dimitri	Review correspondence from R. Wiygul regarding Petitioners' affidavits and strategy for seeking to strike from the record.	0.3	132.00
40125561	08/03/23	Kagedan, Eitan	Fulton County: Review Scheduling Order setting evidentiary hearing and consider strategy and next steps.	0.8	240.00
40125561	08/03/23	Kagedan, Eitan	Fulton County: Research scope of power to compel attendance of witness via notice to attend, to determine applicability to various potential Fulton County witnesses (2.0 hours spent).	1.2	360.00
40125561	08/03/23	Hunter, Maria	Fulton County: Review of Scheduling Order relating to Third Party Neutral Escrow Agent and calendar deadlines.	0.3	45.00
40125561	08/03/23	Wiygul, Robert	Fulton County: Review Special Master's order scheduling evidentiary hearing on appointment of escrow agent; analyze evidentiary and strategic issues regarding same; telephone conferences with E. Kagedan and D. Mavroudis regarding hearing and strategy; email to R. Macias regarding his availability for hearing; email to clients regarding Special Master's scheduling order.	1.0	440.00
40125561	08/03/23	Wiygul, Robert	Fulton County: Research Cerberus and its principal, Joseph Sabia, in preparation for evidentiary hearing.	0.9	396.00
40125561	08/03/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
651058	08/03/23	Mavroudis, Dimitri	Conference call with R. Wiygul regarding hearing strategy.	0.2	88.00
40125561	08/04/23	Wiygul, Robert	Fulton County: Begin comprehensive review of file for potential evidentiary-hearing exhibits and identify need for further investigation regarding potential hearing exhibits.	2.3	1,012.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Confer with Dominion's counsel concerning evidentiary hearing.	0.3	90.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Confer with clients to develop strategy for evidentiary hearing.	0.6	180.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning strategy for evidentiary hearing.	0.3	90.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Identify potential exhibits for evidentiary hearing.	1.4	420.00
40125561	08/07/23	Kagedan, Eitan	Fulton County: Review and respond to correspondence from R. Wiygul concerning potential exhibits for evidentiary hearing.	0.2	60.00
40125561	08/07/23	Hunter, Maria	Fulton County: Research regarding criminal indictments filed in Oakland County, Michigan, relating to People v. Matthew Deparno, case number 2023-285729-FH; People v. Daire Rendon, case number 2023-285730-FH; and People vs. Stefanie Lambert Junttila, case number 2023-285759-FH, in the Sixth Judicial Circuit Court of Oakland County, in preparation for evidentiary hearing.	0.7	105.00
40125561	08/07/23	Hunter, Maria	Fulton County: Communications with Michigan Circuit Court Clerk regarding obtaining indictments in Criminal actions, in preparation for evidentiary hearing.	0.2	30.00
40125561	08/07/23	Hunter, Maria	Fulton County: LinkedIn research regarding J. Sabia for potential use as exhibit at Evidentiary Hearing.	0.6	90.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding strategy for evidentiary hearing and identification of potential hearing exhibits.	0.3	132.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Telephone conferences with M. Hunter regarding collecting and organizing potential evidentiary hearing exhibits.	0.3	132.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding upcoming evidentiary hearing and Petitioners' petition for writ of certiorari.	0.3	132.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Telephone call to Pro V&V regarding status update; left message.	0.1	44.00
40125561	08/07/23	Wiygul, Robert	Fulton County: Prepare for and conduct videoconference with clients regarding strategy for evidentiary hearing and response to Petitioners' petition for writ of certiorari.	0.6	264.00
651058	08/07/23	Mavroudis, Dimitri	Microsoft Teams conference call with client and Co-counsel regarding strategy for evidentiary hearing concerning the appointment of a neutral third-party escrow agent.	0.5	220.00
40125561	08/08/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning pre-hearing filings.	0.4	120.00
40125561	08/08/23	Kagedan, Eitan	Fulton County: Begin drafting pre-hearing submission due August 14 regarding hearing witnesses and exhibits.	0.9	270.00
40125561	08/08/23	Hunter, Maria	Fulton County: Communications with Muskegon County Prosecutor regarding criminal indictments of Attorney Lambert et al.	0.1	15.00
40125561	08/08/23	Hunter, Maria	Fulton County: Draft list of proposed exhibits for use at Evidentiary Hearing.	2.1	315.00
40125561	08/08/23	Hunter, Maria	Fulton County: Research regarding Subpoenas issued in October 2022 in preparation for issuing subpoenas for upcoming evidentiary hearing.	0.2	30.00
40125561	08/08/23	Wiygul, Robert	Fulton County: Review potential hearing exhibits identified by E. Kagedan; review and identify additional potential hearing exhibits; emails with M. Hunter regarding obtaining copy of S. Lambert's indictment; conference with E. Kagedan regarding hearing exhibits, scope of R. Macias's testimony, and drafting of submission on hearing witnesses and exhibits due August 14.	1.9	836.00
40125561	08/09/23	Kagedan, Eitan	Fulton County: Prepare for and conduct conference with R. Macias concerning upcoming evidentiary hearing.	1.0	300.00
40125561	08/09/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning strategy and approach to upcoming evidentiary hearing.	0.5	150.00
40125561	08/09/23	Kagedan, Eitan	Fulton County: Draft pre-hearing submission, including offer of proof for potential witnesses and organization of potential exhibits.	1.8	540.00
40125561	08/09/23	Hunter, Maria	Fulton County: Various communications with Clerk of Commonwealth Court and contact person in Philadelphia regarding issuance of Subpoenas compelling attendance at Evidentiary Hearing.	0.2	30.00
40125561	08/09/23	Hunter, Maria	Fulton County: Draft correspondence to Commonwealth Court enclosing fee payment regarding Subpoenas and coordinate issuance of check.	0.3	45.00
40125561	08/09/23	Hunter, Maria	Fulton County: Review and update the Secretary's list of witnesses and exhibits for Evidentiary Hearing.	0.6	90.00
40125561	08/09/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding draft exhibit and witness lists and drafting of pre-hearing applications.	0.5	220.00
40125561	08/09/23	Wiygul, Robert	Fulton County: Zoom conference with R. Macias to discuss supplemental affidavit for evidentiary hearing, potential additional hearing exhibits, and scope and topics of hearing testimony.	0.9	396.00
40125561	08/10/23	Kagedan, Eitan	Fulton County: Develop strategy for drafting Motions in Limine in advance of evidentiary hearing.	0.6	180.00
40125561	08/10/23	Kagedan, Eitan	Fulton County: Finish drafting pre-hearing submission concerning proposed exhibits and witnesses.	0.7	210.00
40125561	08/10/23	Kagedan, Eitan	Fulton County: Draft supplemental affidavit of R. Macias concerning Cerberus.	1.8	540.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/10/23	Wiygul, Robert	Weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Draft application for permission for Michael Walker to testify remotely via videoconference at the 8/28/23 evidentiary hearing.	1.1	484.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Email and telephone call to Michigan prosecutor seeking copy of Lambert indictment.	0.3	132.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Email M. Walker (Pro V&V) requesting documents and information in preparation for evidentiary hearing.	0.2	88.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Review and comment on draft Application for Permission for Michael Walker to Testify Remotely Via Videoconference at the Evidentiary Hearing Scheduled for August 28, 2023.	0.2	60.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Review correspondence concerning pre-hearing filings.	0.2	60.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning proposed exhibit and witness list, revise draft submission accordingly.	0.7	210.00
40125561	08/11/23	Kagedan, Eitan	Fulton County: Review correspondence concerning potential escrow agreement and consider approach to same.	0.4	120.00
40125561	08/11/23	Hunter, Maria	Fulton County: Review and update documents for potential use as exhibits at Evidentiary Hearing.	0.9	135.00
40125561	08/11/23	Hunter, Maria	Fulton County: Review and update Secretary's List of Exhibits for Evidentiary Hearing.	0.6	90.00
40125561	08/11/23	Wiygul, Robert	Fulton County: Email clients regarding model escrow-agent agreements concerning technology.	0.2	88.00
40125561	08/11/23	Wiygul, Robert	Fulton County: Revise submission containing Secretary's list of witnesses and exhibits; email to clients regarding same; revise supplemental affidavit of R. Macias; email to R. Macias regarding same; draft application of M. Walker in support of application for permission to testify remotely; email M. Walker regarding same.	2.1	924.00
40125561	08/13/23	Hunter, Maria	Fulton County: Draft Notices to Attend directed to R. Bunch, P. Shives, S. Ulsh, E. Martin and P. Hess.	0.7	105.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning pre-hearing submissions.	0.2	60.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Review and finalize pre-hearing submission regarding witnesses and exhibits.	0.9	270.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Review and revise notices to attend.	0.3	90.00
40125561	08/14/23	Kagedan, Eitan	Fulton County: Review R. Macias edits to draft supplemental affidavit.	0.2	60.00
40125561	08/14/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Witness and Exhibit List.	0.9	135.00
40125561	08/14/23	Wiygul, Robert	Fulton County: Review edits by R. Macias to his supplemental affidavit in support of application to appoint escrow agent; email to R. Macias regarding same.	0.3	132.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review petitioners' pre-hearing submission and correspondence related thereto.	1.1	330.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Draft motion in limine concerning qualification of R. Macias as expert (2.2 hours spent).	1.5	450.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review proposed hearing exhibits to ensure accuracy and completeness.	0.3	90.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review hearing transcripts from November 2022 to identify key portions to cite in support of motions in limine.	1.7	510.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll.	0.1	30.00
40125561	08/15/23	Kagedan, Eitan	Fulton County: Review escrow agreements received from the Commonwealth to identify areas to potentially include in proposed agreement.	1.1	330.00
40125561	08/15/23	Hunter, Maria	Fulton County: Research regarding P. Hess and E. Martin in preparation for drafting and serving subpoenas on them for Evidentiary Hearing.	0.8	120.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Revise, finalize, and services Notices to Attend August 28th hearing on Commissioners Ulsh, Bunch, and Shives, Director of Election Hess, and Technology Director Martin; email to Petitioners' counsel regarding same; email to counsel for Petitioners and Dominion seeking position on Secretary's request for permission to present testimony of M. Walker remotely.	0.6	264.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Review and analyze pre-hearing submission of Petitioners regarding witnesses; emails to clients and R. Macias regarding same.	0.9	396.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Telephone conference with M. Hunter regarding preparation of hearing subpoenas directed to E. Martin and P. Hess and marking of hearing exhibits.	0.2	88.00
40125561	08/15/23	Wiygul, Robert	Fulton County: Emails to clients regarding Notices to Attend served on Petitioners' counsel and potential service of hearing subpoenas on E. Martin and P. Hess.	0.1	44.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Review R. Wiygul comments on Motion in Limine concerning expert qualification.	0.2	60.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Draft R. Macias examination outline.	1.7	510.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Prepare for and conduct call with R. Macias concerning Petitioners' pre-hearing submission.	1.4	420.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Prepare witness subpoenas.	0.8	240.00
40125561	08/16/23	Kagedan, Eitan	Fulton County: Review and comment on draft Motion in Limine concerning admission of evidence.	0.4	120.00
40125561	08/16/23	Hunter, Maria	Fulton County: Communications with Process Server regarding service of Subpoenas on P. Hess and E. Martin.	0.1	15.00
40125561	08/16/23	Hunter, Maria	Fulton County: Coordinate drafting of Subpoenas on P. Hess and E. Martin and witness fee checks.	0.5	75.00
40125561	08/16/23	Hunter, Maria	Fulton County: Draft and update cover letters directed to E. Martin and P. Hess enclosing Subpoenas for attendance at hearing.	0.3	45.00
40125561	08/16/23	Hunter, Maria	Fulton County: Draft and update cover letter to Process Server with directions on service of Subpoenas.	0.2	30.00
40125561	08/16/23	Hunter, Maria	Fulton County: Work on Subpoena package directed to E. Martin and P. Hess regarding attendance at Evidentiary Hearing.	0.8	120.00
40125561	08/16/23	Hunter, Maria	Fulton County: Various communications with Process Server regarding service of Subpoenas.	0.1	15.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Zoom conference with R. Macias regarding Petitioners' witness list and offers of proof for August 28th hearing; conference with E. Kagedan regarding motions in limine and hearing subpoenas.	1.0	440.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Review and revise document request attached to hearing subpoenas directed to Hess and Martin.	0.2	88.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Revise letters to witnesses enclosing subpoenas; revise letter to process server with service instructions; emails with team regarding same.	0.4	176.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Emails with clients regarding application to allow M. Walker to testify via videoconference at 8/28 hearing; finalize application for filing.	0.5	220.00
40125561	08/16/23	Wiygul, Robert	Fulton County: Review and revise draft motion in limine regarding expert qualification of R. Macias.	1.1	484.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/16/23	Wiygul, Robert	Fulton County: Complete research of caselaw in support of motion in limine to admit official records from government websites; draft motion in limine; emails to team and clients regarding same.	3.2	1,408.00
40125561	08/17/23	Kagedan, Eitan	Fulton County: Draft proposed order concerning appointment of escrow agent.	2.4	720.00
40125561	08/17/23	Hunter, Maria	Fulton County: Coordinate archival paper set of Secretary's filings for delivery to the Court pursuant to Court requirement.	0.1	15.00
40125561	08/17/23	Hunter, Maria	Fulton County: Review and update Secretary's Hearing exhibits in advance of Evidentiary Hearing.	1.0	150.00
40125561	08/17/23	Hunter, Maria	Fulton County: Communications with Clerk regarding Court Reporter requirement for hearing.	0.1	15.00
40125561	08/17/23	Hunter, Maria	Fulton County: Review and update Motion in Limine regarding Admission of Government Records.	0.5	75.00
40125561	08/17/23	Hunter, Maria	Fulton County: Review and update exhibits to Motions in Limine regarding Admission of Government Records.	1.2	180.00
40125561	08/17/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40125561	08/17/23	Wiygul, Robert	Fulton County: Telephone conference with S. Gallagher (Dominion) regarding Petitioners' witness list and potential motions in limine.	0.2	88.00
40125561	08/17/23	Wiygul, Robert	Fulton County: Draft response to T. Carroll's email regarding Fulton County witnesses on the Secretary's witness list; telephone conferences with process server regarding service of subpoenas on E. Martin and P. Hess; email to counsel for Petitioners and Dominion transmitting copies of subpoenas.	0.6	264.00
40125561	08/17/23	Wiygul, Robert	Fulton County: Revise motions in limine and prepare for hearing; conferences with team regarding same.	1.2	528.00
40125561	08/18/23	Kagedan, Eitan	Fulton County: Review and analyze parties' motions in limine and consider next steps, including potential responses to motions, in advance of evidentiary hearing.	0.9	270.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 1 (to Exclude the Witness Testimony Proffered by Petitioners and Preclude Vexatious, Obdurate, Dilatory, and Bad-Faith Litigation Conduct).	1.3	195.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review and update exhibits to various Motions in Limine.	0.3	45.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 2 (to Qualify Ryan Macias as an Expert in Election Technology and Security).	0.5	75.00
40125561	08/18/23	Hunter, Maria	Fulton County: Review, update, finalize and file Secretary's Motion in Limine No. 3 (to Admit Certain Government Records into Evidence).	0.4	60.00
40125561	08/18/23	Wiygul, Robert	Fulton County: Revise and finalize motions in limine to admit government documents and qualify R. Macias as expert.	0.4	176.00
40125561	08/18/23	Wiygul, Robert	Fulton County: Draft motion in limine no. 1 to exclude Petitioners' proffered witness testimony; email to clients regarding same; revise and finalize same in response to client comments.	5.7	2,508.00
40125561	08/18/23	Wiygul, Robert	Fulton County: Review Petitioners' motion for admission pro hac vice, objection to the Secretary's witness list, and motion to stay proceedings and Dominion's objection to Petitioners' witness list; emails to clients regarding same; research case law in preparation for responding to motion to stay; research cases involving R. Newman for response to motion for admission pro hac vice.	2.9	1,276.00
40125561	08/19/23	Wiygul, Robert	Fulton County: Research case law regarding motions for stay pending disposition of petitions for writ of certiorari in preparation for responding to Petitioners' motion for stay.	0.5	220.00
40125561	08/20/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding Petitioners' filings from Friday evening and upcoming evidentiary hearing.	0.4	176.00
40125561	08/20/23	Wiygul, Robert	Fulton County: Draft answer in opposition to Petitioners' motion to stay proceedings.	2.8	1,232.00
40125561	08/20/23	Wiygul, Robert	Fulton County: Continue researching litigation history of R. Newman; draft lengthy email to clients regarding same and strategy for responding to application for admission pro hac vice.	2.3	1,012.00
40125561	08/21/23	Kagedan, Eitan	Fulton County: Review Petitioners' pre-hearing filings and review and comment on draft responses thereto.	0.2	60.00
40125561	08/21/23	Kagedan, Eitan	Fulton County: Continue drafting proposed order for appointment of escrow agent.	1.3	390.00
40125561	08/21/23	Hill, John	Fulton County: Revise pre-hearing submissions and briefs.	1.2	300.00
40125561	08/21/23	Hill, John	Fulton County: Draft outline for hearing cross examination of Fulton County's proposed escrow agent.	3.2	800.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review, update, finalize and file Answer to Motion to Stay.	1.5	225.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review of Order scheduling Pre-Hearing Telephonic Conference for calendaring.	0.1	15.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review of Order denying Fulton County's Pro Hac Vice and scheduling deadline for submission of Amended Pro Hac Vice for calendaring.	0.1	15.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review and update Answer to Petitioner's Amended Pro Hac Vice Application and prepare exhibits in support.	0.8	120.00
40125561	08/21/23	Hunter, Maria	Fulton County: Review, update, finalize and file Answer to Petitioners' Objection to Secretary's Witness List.	1.0	150.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Revise and finalize answer to Petitioners' motion to stay proceedings.	0.5	220.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Draft answer to Petitioners' application for admission pro hac vice of R. Newman.	4.7	2,068.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Review Petitioners' Consolidated Response to Dominion's Objections.	0.2	88.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Emails with R. Macias and M. Walker to schedule conferences to prepare for evidentiary hearing.	0.1	44.00
40125561	08/21/23	Wiygul, Robert	Fulton County: Draft answer to Petitioners' objection to the Secretary's witness list; email to clients regarding same.	2.0	880.00
40125561	08/22/23	Hill, John	Fulton County: Participate in witness prep with R. Wiygul and proposed escrow agent (M. Walker).	2.0	500.00
40125561	08/22/23	Hill, John	Fulton County: Participate in witness prep with R. Wiygul and R. Macias.	1.0	250.00
40125561	08/22/23	Hunter, Maria	Fulton County: Review and update exhibits to Secretary's Answer to Amended Pro Hac Vice Application.	0.4	60.00
40125561	08/22/23	Hunter, Maria	Fulton County: Communications with K. Michalczyk regarding preparation and submission of archival paper copies of Secretary's filings.	0.3	45.00
40125561	08/22/23	Hunter, Maria	Fulton County: Review and update Secretary's Answer to Amended Pro Hac Vice Application.	1.0	150.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Revise answer to application pro hac vice per comments by M. Hunter and J. Hill.	0.6	264.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Revise and supplement proposed order governing escrow services; emails to team and R. Macias regarding same.	1.9	836.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Review Dominion's objection to Petitioners' motion for admission PHV; email to clients regarding same.	0.2	88.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/22/23	Wiygul, Robert	Fulton County: Review client comments on answer to pro hac vice application; telephone conversations with J. Hill regarding edits to same; review Petitioners' amended motion for admission pro hac vice; revise and finalize answer to amended PHV application.	1.2	528.00
40125561	08/23/23	Hill, John	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.2	300.00
40125561	08/23/23	Hill, John	Fulton County: Attend telephonic pre-hearing conference with Court regarding evidentiary hearing on appointment of escrow agent.	0.9	225.00
40125561	08/23/23	Hill, John	Fulton County: Confer with R. Wiygul and M. Walker to prepare for evidentiary hearing on appointment of escrow agent.	1.2	300.00
40125561	08/23/23	Hill, John	Fulton County: Confer with R. Wiygul to prepare for evidentiary hearing on appointment of escrow agent.	0.3	75.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Review file and prepare for pre-hearing status conference; attend status conference; telephone conference with J. Hill and D. Mavroudis to debrief and discuss next steps.	2.3	1,012.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Review orders denying Petitioners' motion to stay proceedings, permitting M. Walker to testify remotely, granting the Secretary's Motion in Limine No. 2, and granting the Secretary's Motion in Limine No. 3; emails to clients regarding same; email to court staff to provide M. Walker's contact information.	0.8	352.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Review second amended application for admission pro hac vice of R. Newman; email to clients regarding same.	0.1	44.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Draft lengthy email to clients regarding pre-hearing conference before Special Master.	0.7	308.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding status conference and upcoming evidentiary hearing.	0.2	88.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Zoom conference with R. Macias to prepare for evidentiary hearing; follow-up conference with J. Hill regarding revisions to witness-examination outlines.	1.4	616.00
40125561	08/23/23	Wiygul, Robert	Fulton County: Draft outline of M. Walker's direct examination and Zoom conference with M. Walker to prepare for evidentiary hearing.	2.5	1,100.00
651058	08/23/23	Mavroudis, Dimitri	Videoconference with M. Walker regarding hearing preparation.	1.2	528.00
651058	08/23/23	Mavroudis, Dimitri	Attend witness preparation session with expert Ryan Macias.	1.2	528.00
651058	08/23/23	Mavroudis, Dimitri	Attend pre-hearing conference call with the Court.	0.9	396.00
651058	08/23/23	Mavroudis, Dimitri	Strategy call with R. Wiygul and J. Hill regarding hearing strategy.	0.2	88.00
40125561	08/24/23	Hill, John	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.5	375.00
40125561	08/24/23	Wiygul, Robert	Fulton County: Review memoranda and orders resolving motions in limine seeking to exclude witness testimony; telephone conference with J. Hill regarding same; email to clients regarding same.	0.5	220.00
40125561	08/24/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40125561	08/24/23	Wiygul, Robert	Fulton County: Revise and supplement outline of direct examination of R. Macias; videoconference with R. Macias to prepare for hearing.	2.5	1,100.00
40125561	08/25/23	Hill, John	Fulton County: Research standard for sequestration of witnesses and draft bench memorandum regarding same.	1.8	450.00
40125561	08/25/23	Hill, John	Fulton County: Investigate and analyze impeachment material for cross-examination of County's expert witness (B. Cotton).	2.0	500.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review correspondence to Court enclosing archival paper copies of filings and identify missing documents.	0.4	60.00
40125561	08/25/23	Hunter, Maria	Fulton County: Plan and prepare for Evidentiary Hearing.	1.3	195.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review and analyze copies of prior hearing transcripts from November 2022 for potential use at Evidentiary Hearing.	1.2	180.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review Secretary's filing and draft Demonstrative Exhibit regarding Pro V&V Fees for Escrow Services.	0.4	60.00
40125561	08/25/23	Hunter, Maria	Fulton County: Review, update, finalize and file Response to Petitioners' Application to Present Remote Testimony and New Cotton Affidavit.	1.4	210.00
40125561	08/25/23	Hunter, Maria	Fulton County: Prepare additional hearing exhibits to include in exhibit binders.	0.6	90.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Videoconference with M. Walker to prepare for hearing testimony.	1.4	616.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Review and analyze Petitioners' application to permit remote testimony of their witnesses and attached affidavits; telephone conference with J. Hill regarding same; email to clients regarding same; email to R. Macias regarding new affidavit from B. Cotton.	0.4	176.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Draft response to Petitioners' amended application to present remote witness testimony and cross-application to strike new affidavit of B. Cotton.	1.7	748.00
40125561	08/25/23	Wiygul, Robert	Fulton County: Refine and supplement witness-examination outlines, review and annotate potential hearing exhibits, and prepare for hearing; conferences with team members regarding same.	1.5	660.00
651058	08/25/23	Mavroudis, Dimitri	Videoconference with M. Walker regarding hearing preparation.	1.4	616.00
40125561	08/26/23	Hill, John	Fulton County: Confer with R. Wiygul and R. Macias to prepare for evidentiary hearing on appointment of escrow agent.	1.0	250.00
40125561	08/26/23	Hunter, Maria	Fulton County: Prepare materials for potential use at Evidentiary Hearing.	4.0	600.00
40125561	08/26/23	Wiygul, Robert	Fulton County: Revise outline of R. Macias' direct examination; videoconference with R. Macias to prepare for evidentiary hearing.	2.0	880.00
40125561	08/26/23	Wiygul, Robert	Fulton County: Revise hearing-examination outlines for R. Macias and M. Walker; detailed review and annotation of potential hearing exhibits; review past affidavits and deposition testimony of B. Cotton in preparation for cross-examination; conferences with M. Hunter regarding potential additional hearing exhibits and preparation for hearing.	4.8	2,112.00
40125561	08/27/23	Hunter, Maria	Fulton County: Research J. Sabia for anticipated cross-examination and plan and prepare for Evidentiary Hearing.	2.7	405.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Draft outline for examination of Fulton County witnesses.	0.8	352.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Videoconference with M. Walker to prepare for evidentiary hearing.	0.8	352.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40125561	08/27/23	Wiygul, Robert	Fulton County: Analyze potential avenues of cross-examination for J. Sabia and B. Cotton (including travel from Philadelphia to Harrisburg for hearing).	2.0	880.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Conference with R. Macias regarding direct examination and potential rebuttal testimony and potential testimony from B. Cotton.	1.9	836.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Continuing drafting and refining outlines for examinations of Fulton County witnesses and J. Sabia.	3.5	1,540.00
40125561	08/27/23	Wiygul, Robert	Fulton County: Finish reviewing deposition of B. Cotton in preparation for cross-examination.	1.7	748.00
40125561	08/28/23	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning evidentiary hearing on appointment of escrow agent, including travel between Philadelphia and Harrisburg.	17.2	5,160.00
40125561	08/28/23	Hunter, Maria	Fulton County: Travel to/from Harrisburg to attend Evidentiary Hearing.	3.8	570.00
40125561	08/28/23	Hunter, Maria	Fulton County: Plan and prepare for Evidentiary Hearing.	1.7	255.00
40125561	08/28/23	Hunter, Maria	Fulton County: Attend evidentiary hearing.	10.3	1,545.00
40125561	08/28/23	Wiygul, Robert	Fulton County: Draft outlines for oral argument on motion to strike second affidavit of B. Cotton and request for sequestration of J. Sabia; prepare for and attend evidentiary hearing; conferences with team and clients regarding same (including 2.0 hours of travel from Harrisburg to Philadelphia).	12.9	5,676.00
651058	08/28/23	Mavroudis, Dimitri	Travel to/from Harrisburg to attend hearing regarding the selection of an escrow agent.	14.0	6,160.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Draft email to clients concerning sequence of remaining witness examinations.	0.3	90.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Review correspondence regarding Petitioners' cross-examination of R. Macias and consider implications for testimony of M. Walker and potential rebuttal testimony by R. Macias.	0.7	210.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Prepare for continuation of evidentiary hearing, including review of witness examination outlines and social media postings by J. Sabia.	2.4	720.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Research authority regarding taking judicial notice of content of websites in preparation for potential evidentiary arguments at hearing (2.6 hours spent).	1.9	570.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Telephone conference with M. Walker to prepare for upcoming testimony.	0.8	240.00
40125561	08/29/23	Kagedan, Eitan	Fulton County: Travel to Harrisburg for continuation of evidentiary hearings.	2.0	600.00
40125561	08/29/23	Hill, John	Fulton County: Review and collect social media posts relevant to impeachment of J. Sabia.	2.5	625.00
40125561	08/29/23	Hill, John	Fulton County: Review and collect material relevant to impeachment and voir dire of County's proposed expert witness (B. Cotton).	2.5	625.00
40125561	08/29/23	Hunter, Maria	Fulton County: Research and review of social media posts by J. Sabia in advance of cross examination at Evidentiary Hearing and prepare potential exhibits regarding same (6.6 hours spent).	4.0	600.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Train travel from Philadelphia to Harrisburg for second day of hearing, including revising and supplementing cross-examination outline for J. Sabia and emails with team regarding collecting social media posts and exhibits.	1.8	792.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Revise outline of examination of M. Walker and videoconference with M. Walker to prepare for hearing.	1.2	528.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Conference with R. Macias to prepare for cross-examination of B. Cotton and discuss potential topics of rebuttal testimony.	1.0	440.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Finish revising and supplementing outline of J. Sabia's examination and revise outline of examination of B. Cotton.	1.9	836.00
40125561	08/29/23	Wiygul, Robert	Fulton County: Research J. Sabia's Facebook and Twitter posts in support of cross-examination of J. Sabia; emails to clients regarding order of forthcoming witness examinations and communications with M. Walker; review Petitioners' application for reconsideration of SCOPA scheduling order.	2.9	1,276.00
40125561	08/30/23	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning evidentiary hearing on appointment of escrow agent.	11.0	3,300.00
40125561	08/30/23	Kagedan, Eitan	Fulton County: Prepare for continuation of evidentiary hearing, including researching caselaw regarding timeliness of service of subpoenas, reviewing witness examination outlines, and reviewing and commenting on draft response to applications to stay.	2.8	840.00
40125561	08/30/23	Hill, John	Fulton County: Travel to and from and attend hearing on appointment of escrow agent, including drafting of SCOPA response to Petitioners' applications to stay.	14.0	3,500.00
40125561	08/30/23	Hunter, Maria	Fulton County: Travel to Harrisburg to attend continued Evidentiary Hearing.	1.8	270.00
40125561	08/30/23	Hunter, Maria	Fulton County: Plan and prepare for continued evidentiary hearing.	1.8	270.00
40125561	08/30/23	Hunter, Maria	Fulton County: Attend continued evidentiary hearing.	8.7	1,305.00
40125561	08/30/23	Hunter, Maria	Fulton County: Review and update Answer to Fulton County's Emergency Application for a Stay upon Special Master's Denial of Same, and prepare exhibits.	1.8	270.00
40125561	08/30/23	Hunter, Maria	Fulton County: Review of proposed images regarding social media for cross examination of J. Sabia.	0.7	105.00
40125561	08/30/23	Wiygul, Robert	Fulton County: Prepare for and attend evidentiary hearing; conferences with team, clients, and R. Macias regarding same.	9.7	4,268.00
40125561	08/30/23	Wiygul, Robert	Fulton County: Review and revise and comment on draft answer to Petitioners' application seeking stay of proceedings from Pennsylvania Supreme Court.	1.0	440.00
40125561	08/31/23	Pratt, Christine	Fulton County: Review for accuracy the Response to an Emergency Application for Stay and Exhibits A - M in support thereof, obtain attorney's approval to file, and file the same in the Pa. Supreme Court.	0.9	135.00
40125561	08/31/23	Kagedan, Eitan	Fulton County: Prepare for, appear for, and follow up concerning continuation of evidentiary hearing on appointment of escrow agent, including travel from Harrisburg to Philadelphia.	12.5	3,750.00
40125561	08/31/23	Hill, John	Fulton County: Revise SCOPA response to emergency application for stay.	1.0	250.00
40125561	08/31/23	Hunter, Maria	Fulton County: Plan and prepare for continued Evidentiary Hearing.	1.5	225.00
40125561	08/31/23	Hunter, Maria	Fulton County: Attend continued Evidentiary Hearing.	7.4	1,110.00
40125561	08/31/23	Hunter, Maria	Fulton County: Travel from Harrisburg to Philadelphia.	2.0	300.00
40125561	08/31/23	Wiygul, Robert	Fulton County: Revise and supplement cross-examination outline for J. Sabia and revise cross-examination outline for B. Cotton.	2.5	1,100.00
40125561	08/31/23	Wiygul, Robert	Fulton County: Prepare for and attend evidentiary hearing; conferences with team and clients regarding same.	9.7	4,268.00
40125561	08/31/23	Wiygul, Robert	Fulton County: Travel from Harrisburg to Philadelphia following hearing, including de-briefing with team and email to client about next steps en route (excluding time spent working on other matters).	1.5	660.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40126225	09/01/23	Wiygul, Robert	Fulton County: Telephone conference with S. Kirkpatrick regarding Petitioners' SCOTUS application for stay.	0.2	88.00
40126225	09/01/23	Wiygul, Robert	Fulton County: Email to S. Kirkpatrick regarding Secretary's opposition to Petitioners' SCOPA applications to stay.	0.1	44.00
40126225	09/05/23	Hunter, Maria	Fulton County: Review of transcripts of hearing held on August 30, 2023 and August 31, 2023; communications with Court Reporter regarding transcript for hearing held on August 28, 2023.	0.1	15.00
40126225	09/06/23	Kagedan, Eitan	Fulton County: Review and analyze Petitioners' post-hearing filing; conference with R. Wiygul regarding same.	0.7	210.00
40126225	09/06/23	Wiygul, Robert	Fulton County: Review Fulton County's closing arguments and objections; email to clients regarding same.	0.6	264.00
40126225	09/07/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.2	88.00
40126225	09/07/23	Wiygul, Robert	Fulton County: Telephone conference with S. Kirkpatrick regarding pending SCOTUS application to stay.	0.3	132.00
40126225	09/14/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40126225	09/15/23	Kagedan, Eitan	Fulton County: Begin review of Special Master's Memorandum Order.	0.4	120.00
40126225	09/15/23	Hunter, Maria	Fulton County: Update matter calendar relating to Proposed Final Appointment Order executed by Pro V&V.	0.1	15.00
40126225	09/15/23	Wiygul, Robert	Fulton County: Review and analyze Special Master's memorandum opinion and order; telephone conferences with E. Kagedan and J. Hill regarding same; emails to clients regarding same; emails to R. Macias and M. Walker regarding same.	2.0	880.00
40126225	09/18/23	Kagedan, Eitan	Fulton County: Continue review of Special Master's Memorandum Order and consider next steps in light thereof.	2.0	600.00
40126225	09/18/23	Kagedan, Eitan	Fulton County: Review edits to proposed appointment order drafted before hearing, in preparation for drafting proposed final appointment order.	0.2	60.00
40126225	09/18/23	Wiygul, Robert	Fulton County: Videoconference with M. Walker (Pro V&V) to discuss Special Master's Preliminary Appointment Order and provisions of proposed final appointment order; follow-up conference with E. Kagedan regarding next steps.	1.0	440.00
40126225	09/18/23	Wiygul, Robert	Fulton County: Review preliminary appointment order regarding issues to discuss with M. Walker; conference with E. Kagedan to review Memorandum Opinion and Order and prepare for conference with M. Walker.	0.7	308.00
651276	09/18/23	Weinstein, Hillary B.	Conference with Pro V & V Program Manager regarding implementation of Supreme Court Order for voting machines.	0.9	396.00
40126225	09/19/23	Kagedan, Eitan	Fulton County: Prepare for, conduct, and follow up regarding call with R. Macias concerning Special Master's Opinion and plan for proposed final appointment order.	0.7	210.00
40126225	09/19/23	Kagedan, Eitan	Fulton County: Draft Proposed Final Appointment Order.	5.1	1,530.00
40126225	09/19/23	Wiygul, Robert	Fulton County: Review and analyze previous draft appointment order created before hearing; conference with E. Kagedan to review current rough draft of final appointment order and discuss needed additions and revisions.	1.5	660.00
40126225	09/19/23	Wiygul, Robert	Fulton County: Prepare for and conduct videoconference with R. Macias regarding Special Master's opinion and preliminary appointment order and drafting of proposed final appointment order.	0.6	264.00
40126225	09/19/23	Wiygul, Robert	Fulton County: Emails with M. Walker regarding pricing and timeline for various security-camera features; conferences with E. Kagedan regarding same.	0.4	176.00
651276	09/19/23	Weinstein, Hillary B.	Conference with expert regarding implementation of Supreme Court Order for voting machines.	0.7	308.00
40126225	09/20/23	Kagedan, Eitan	Fulton County: Finish drafting proposed final appointment order.	1.3	390.00
40126225	09/21/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning draft proposed final appointment order and next steps.	0.4	120.00
40126225	09/21/23	Wiygul, Robert	Attend weekly conference call with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40126225	09/21/23	Wiygul, Robert	Fulton County: Review and revise draft of proposed final appointment order received from E. Kagedan; telephone conference with E. Kagedan regarding same.	1.1	484.00
40126225	09/25/23	Wiygul, Robert	Fulton County: Emails and telephone conference with Pro V&V's outside general counsel regarding entry of appearance.	0.4	176.00
40126225	09/25/23	Wiygul, Robert	Fulton County: Revise proposed final appointment order.	0.7	308.00
40126225	09/26/23	Kagedan, Eitan	Fulton County: Review correspondence with Pro V&V and R. Macias concerning Final Appointment Order.	0.4	120.00
40126225	09/26/23	Kagedan, Eitan	Fulton County: Draft Affidavits in Support of Proposed Final Appointment Order and discuss strategy with R. Wiygul.	1.6	480.00
40126225	09/26/23	Kagedan, Eitan	Fulton County: Review revisions to Proposed Final Appointment Order.	0.4	120.00
40126225	09/26/23	Wiygul, Robert	Fulton County: Begin drafting application to enter proposed final appointment order.	0.4	176.00
40126225	09/26/23	Wiygul, Robert	Fulton County: Revise and supplement proposed final appointment order and supporting affidavits of M. Walker and W. Owens; multiple emails with M. Walker, R. Macias, and E. Kagedan regarding same; email to clients transmitting draft final appointment order.	4.5	1,980.00
40126225	09/27/23	Kagedan, Eitan	Fulton County: Review correspondence concerning revisions to proposed final appointment order and review application to enter proposed order.	0.3	90.00
40126225	09/27/23	Wiygul, Robert	Fulton County: Finish drafting application to enter final appointment order and revise supporting Walker affidavit and proposed final order; emails to M. Walker, R. Macias, and clients regarding same.	2.8	1,232.00
40126225	09/28/23	Kagedan, Eitan	Fulton County: Review and comment on Application for Entry of Final Appointment Order, Proposed Final Appointment Order, and Affidavits in Support Thereof.	1.7	510.00
40126225	09/28/23	Kagedan, Eitan	Fulton County: Draft Affidavit of R. Macias in support of Application for Entry of Proposed Final Appointment Order.	1.2	360.00
40126225	09/28/23	Wiygul, Robert	Fulton County: Revise supporting Macias affidavit; communications with R. Macias regarding same; multiple rounds of revisions of application to enter proposed final appointment order and proposed order; numerous communications with Dominion's counsel, Pro V&V's counsel, R. Macias, and clients regarding same.	4.3	1,892.00
40126225	09/29/23	Kagedan, Eitan	Fulton County: Review and comment on Application for entry of final order and supporting documents.	0.2	60.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40126225	09/29/23	Wiygul, Robert	Fulton County: Review and comment on revised Macias affidavit in support of Application to Enter Proposed Final Appointment Order; emails with R. Macias regarding same.	0.3	132.00
40126225	09/29/23	Wiygul, Robert	Fulton County: Email and telephone communications with counsel for Dominion regarding description of equipment to be escrowed in proposed order and amendment to lease agreement between Dominion and Fulton County; email and telephone communications with Pro V&V's counsel and R. Macias, respectively, regarding same; emails with clients regarding need to seek extension of time to submit proposed final appointment order; draft, revise, and file joint application for extension of time; emails with clients and Dominion's counsel regarding same.	3.9	1,716.00
40126225	09/29/23	Wiygul, Robert	Fulton County: Review and incorporate H. Weinstein's comments on proposed final appointment order.	0.5	220.00
651276	09/29/23	Weinstein, Hillary B.	Review of draft Order regarding storage of voting machines; correspondence with R. Wiygul regarding same.	0.4	176.00
40126865	10/02/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning approach to revising proposed final appointment order.	0.2	60.00
40126865	10/02/23	Kagedan, Eitan	Fulton County: Review correspondence from R. Macias concerning itemization of equipment to be escrowed for purposes of drafting proposed final appointment order.	0.2	60.00
40126865	10/02/23	Hunter, Maria	Fulton County: Review of Order granting Application for Extension of Time to File Proposed Final Appointment Order, and update matter calendar regarding same.	0.1	15.00
40126865	10/02/23	Wiygul, Robert	Fulton County: Review order granting extension of time to file proposed final appointment order; emails with R. Macias, clients, and Dominion regarding specific equipment provided to Fulton County.	0.5	220.00
40126865	10/02/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding specific equipment in Fulton County's possession and authentication of amendment to Fulton County's contract with Dominion, in preparation for drafting application to enter proposed final appointment order.	0.4	176.00
40126865	10/03/23	Kagedan, Eitan	Fulton County: Review drafting and negotiation history of Inspection Protocol Agreement for specific machines that would be made available for inspection, in preparation for drafting proposed final appointment order.	1.3	390.00
40126865	10/04/23	Wiygul, Robert	Fulton County: Telephone conference with K. Goldman regarding documentation identifying specific equipment currently in Fulton County's possession, in support of proposed final appointment order.	0.5	220.00
40126865	10/05/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning application for entry of final appointment order.	0.2	60.00
40126865	10/05/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40126865	10/06/23	Wiygul, Robert	Fulton County: Communications with Dominion's counsel regarding February 2020 amendment to contract with Fulton County; revise proposed final appointment order to conform to equipment list and include footnote disclaimer by Pro V&V; emails with Pro V&V's counsel and clients regarding same.	1.1	484.00
40126865	10/10/23	Kagedan, Eitan	Fulton County: Finalize all details concerning Application for Entry of Final Appointment Order.	2.1	630.00
40126865	10/10/23	Hunter, Maria	Fulton County: Finalize and file Application to Enter Proposed Final Appointment Order.	0.3	45.00
40126865	10/10/23	Wiygul, Robert	Fulton County: Revise application to enter final appointment order; emails with team, clients, and Pro V&V's counsel regarding same.	0.9	396.00
40126865	10/10/23	Wiygul, Robert	Fulton County: Communications with K. Goldman (Dominion) re authentication of amendment to list of equipment to accompany application to enter final appointment order.	0.1	44.00
40126865	10/11/23	Hunter, Maria	Fulton County: Communications regarding archival copy of filing for Court.	0.1	15.00
40126865	10/12/23	Wiygul, Robert	Attend weekly videoconference with clients, SUDC, and OAG to discuss status of Fulton County case and related matters.	0.1	44.00
40126865	10/15/23	Wiygul, Robert	Fulton County: Review email from T. Carroll requesting extension of time to submit Petitioners' response to proposed final appointment order; email to clients regarding same.	0.3	132.00
40126865	10/16/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding Petitioners' request for extension of deadline to respond to Proposed Final Appointment Order; emails with clients regarding same; draft and send response email to Petitioners' counsel.	0.6	264.00
40126865	10/17/23	Kagedan, Eitan	Fulton County: Review petitioners' filing concerning appointment of escrow agent.	0.9	270.00
40126865	10/17/23	Wiygul, Robert	Fulton County: Telephone conferences with Pro V&V's counsel regarding Pro V&V's retention of Pennsylvania counsel and entry of appearance.	0.4	176.00
40126865	10/17/23	Wiygul, Robert	Fulton County: Review and analyze Petitioners' response to proposed final appointment order.	0.4	176.00
40126865	10/19/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC regarding status of Fulton County case and related matters.	0.1	44.00
40126865	10/19/23	Wiygul, Robert	Fulton County: Draft reply to Petitioners' Response to Proposed Final Appointment Order.	1.2	528.00
40126865	10/20/23	Kagedan, Eitan	Fulton County: Review draft reply in support of Application for Entry of Final Appointment Order.	0.3	90.00
40126865	10/20/23	Hunter, Maria	Fulton County: Review, revise, and finalize Reply in Support of Application to Enter Proposed Final Appointment Order.	0.7	105.00
40126865	10/20/23	Wiygul, Robert	Fulton County: Finish drafting reply in support of Proposed Final Appointment Order; emails with team and clients regarding same; revise and finalize same.	1.3	572.00
40126865	10/23/23	Wiygul, Robert	Fulton County: Email to clients regarding filing of reply brief in support of application to enter proposed final appointment order.	0.1	44.00
40126865	10/27/23	Wiygul, Robert	Fulton County: Review and analyze final appointment order and accompanying memorandum opinion; emails to clients, R. Jones and C. Woods (Pro V&V's counsel), and R. Macias regarding same.	1.0	440.00
40127315	11/02/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40127315	11/06/23	Wiygul, Robert	Fulton County: Telephone conference with C. Woods (counsel for Pro V&V) regarding his entry of appearance and final appointment order.	0.2	88.00
40127315	11/09/23	Wiygul, Robert	Attend weekly videoconference meeting with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40127315	11/22/23	Wiygul, Robert	Fulton County: Emails to R. Macias, clients, and K. Goldman (Dominion's counsel) regarding scheduling of Pro V&V's pickup of electronic voting equipment.	0.3	132.00
40127315	11/27/23	Kagedan, Eitan	Fulton County: Review Petitioners' Application for Relief.	0.4	120.00
40127315	11/27/23	Wiygul, Robert	Fulton County: Preliminary review and analysis of Petitioners' SCOPA application challenging Special Master's Final Appointment Order.	0.3	132.00
40127315	11/27/23	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding scheduling of election equipment pickup by Pro V&V.	0.3	132.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40127315	11/28/23	Hunter, Maria	Fulton County: Review of letter from Supreme Court Prothonotary regarding Response to Application for Relief and Review of Appointment Order and Memorandum Opinion and calendar response deadline.	0.1	15.00
40127315	11/28/23	Wiygul, Robert	Fulton County: Thorough review and analysis of Petitioners' SCOPA application challenging Final Appointment Order and formulate responsive arguments.	0.8	352.00
40127315	11/29/23	Kagedan, Eitan	Fulton County: Review and consider response to email correspondence from T. Carroll.	0.1	30.00
40127315	11/29/23	Wiygul, Robert	Fulton County: Communications with Dominion's counsel regarding Pro V&V's pickup of voting equipment; draft email to C. Woods proposing pickup dates and requesting Pro V&V's and Fulton County's availability.	0.6	264.00
40127315	11/29/23	Wiygul, Robert	Fulton County: Review T. Carroll's email requesting stay of payment of Pro V&V's fees; emails with clients regarding same; email T. Carroll with Secretary's position.	0.3	132.00
40127315	11/30/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40127698	12/03/23	Wiygul, Robert	Fulton County: Begin drafting brief in opposition to Petitioners' application for SCOPA review of Final Appointment Order.	0.5	220.00
40127698	12/05/23	Kagedan, Eitan	Fulton County: Review correspondence with T. Carroll concerning transfer to escrow agent.	0.1	30.00
40127698	12/05/23	Wiygul, Robert	Fulton County: Email to T. Carroll regarding scheduling of Pro V&V's pick up of voting equipment.	0.3	132.00
40127698	12/05/23	Wiygul, Robert	Fulton County: Email to R. Macias with status update regarding scheduling of Pro V&V's pickup of Fulton County's election equipment.	0.2	88.00
40127698	12/06/23	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning escrow transfer.	0.1	30.00
40127698	12/06/23	Wiygul, Robert	Fulton County: Draft brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	3.6	1,584.00
40127698	12/07/23	Wiygul, Robert	Fulton County: Continue drafting brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	6.9	3,036.00
40127698	12/08/23	Wiygul, Robert	Fulton County: Continue drafting brief in opposition to Petitioners' SCOPA application challenging Final Appointment Order.	11.0	4,840.00
40127698	12/10/23	Hunter, Maria	Fulton County: Review and update references to case law and pleadings relied upon in Response to Petitioners' SCOPA Application.	2.7	405.00
40127698	12/11/23	Kagedan, Eitan	Fulton County: Review draft Response to Petitioners' SCOPA application.	0.3	90.00
40127698	12/11/23	Hunter, Maria	Fulton County: Review and update exhibits in support of Opposition to Application for Relief.	0.3	45.00
40127698	12/11/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Opposition to Application for Relief.	0.9	135.00
40127698	12/11/23	Wiygul, Robert	Fulton County: Review team's and client's comments on response to Petitioners' SCOPA application challenging Final Appointment Order; revise and finalize same.	2.8	1,232.00
40127698	12/12/23	Kagedan, Eitan	Fulton County: Review draft Status Report to Special Master.	0.3	90.00
40127698	12/12/23	Wiygul, Robert	Fulton County: Draft Notice to Special Master regarding arrangements to transfer custody of voting equipment to Pro V&V.	1.2	528.00
40127698	12/12/23	Wiygul, Robert	Fulton County: Review E. Kagedan's comments on draft notice to Special Master regarding status of voting equipment pickup arrangements and revise same; emails with E. Kagedan regarding same.	0.3	132.00
40127698	12/12/23	Wiygul, Robert	Fulton County: Telephone conferences with K. Goldman (Dominion) and C. Woods (Pro V&V) regarding scheduling pickup of election equipment.	0.3	132.00
40127698	12/13/23	Hunter, Maria	Fulton County: Review and update Secretary's Notice to Special Master regarding Arrangements to Transfer Voting Equipment.	0.3	45.00
40127698	12/13/23	Wiygul, Robert	Fulton County: Emails with clients and team regarding notice to Special Master regarding status of arrangements to pick up voting equipment.	0.2	88.00
40127698	12/14/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Notice to Special Master regarding Status of Arrangements to Transfer Voting Equipment.	0.3	45.00
40127698	12/14/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40127698	12/14/23	Wiygul, Robert	Fulton County: Emails with client regarding Notice to Special Master regarding Transfer Date; finalize same for filing.	0.1	44.00
40127698	12/19/23	Wiygul, Robert	Fulton County: Emails with R. Macias regarding scheduling of voting equipment pickup and potential affidavit in support of dispositive motion.	0.1	44.00
40127698	12/21/23	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.3	132.00
40127698	12/21/23	Wiygul, Robert	Fulton County: Telephone calls with C. Woods and K. Goldman regarding schedule for Pro V&V's pick up of election equipment.	0.3	132.00
40127698	12/22/23	Wiygul, Robert	Draft and revise application regarding transfer date for pickup of voting equipment; emails with E. Kagedan and clients regarding same.	1.7	748.00
40127698	12/26/23	Wiygul, Robert	Revise application to set Transfer Date; emails with clients regarding same.	0.6	264.00
40127698	12/27/23	Wiygul, Robert	Fulton County: Further revise application to set Transfer Date based on New Jersey Supreme Court's denial of request to adjourn January 16-17 oral argument.	0.2	88.00
40127698	12/28/23	Wiygul, Robert	Fulton County: Telephone conference with C. Woods regarding status of installation of remote-monitoring equipment.	0.3	132.00
40127698	12/28/23	Wiygul, Robert	Attend weekly videoconference with clients and OAG to discuss status of Fulton County case and related matters.	0.1	44.00
40127698	12/29/23	Wiygul, Robert	Fulton County: Review email from C. Woods regarding installation of remote-monitoring equipment; revise, finalize, and file application regarding date for Pro V&V's pickup of voting equipment.	0.4	176.00
40128216	01/02/24	Kagedan, Eitan	Fulton County: Review Order on Application Regarding the Date to Transfer Custody of Voting Equipment.	0.1	30.00
40128216	01/02/24	Hunter, Maria	Fulton County: Review for calendaring purposes of Order scheduling Petitioners' Answer to Application regarding Date to Transfer Custody of Voting Equipment.	0.1	15.00
40128216	01/02/24	Wiygul, Robert	Fulton County: Review Special Master's Order on application to schedule Transfer Date; email to clients regarding same.	0.2	88.00
40128216	01/03/24	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning transfer date and correspondence concerning proposed response thereto.	0.3	90.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40128216	01/03/24	Wiygul, Robert	Fulton County: Review T. Carroll's email requesting extension of time to respond to Secretary's application regarding transfer date; emails with clients regarding same; email response to T. Carroll.	0.2	88.00
40128216	01/04/24	Kagedan, Eitan	Fulton County: Review Dominion correspondence concerning Petitioners' request for extension.	0.1	30.00
40128216	01/04/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40128216	01/04/24	Wiygul, Robert	Fulton County: Email to R. Macias regarding status of scheduling Pro V&V's pickup of voting equipment.	0.1	44.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review correspondence concerning Petitioners' Application.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review Petitioners' Motion for an Extension of the Time to Respond to the Secretary's Application regarding the Date to Transfer Custody of Voting Equipment.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Confer with R. Wiygul and formulate strategy regarding Petitioners' application for extension of time to respond to motion scheduling voting-machine transfer.	0.4	120.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Telephone conference with S. Gallagher concerning Petitioners' Application.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning Petitioners' Application.	0.2	60.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Review Order filed.	0.1	30.00
40128216	01/05/24	Hunter, Maria	Fulton County: Review for calendaring purposes of Order Extending Time for Petitioners to Answer Application regarding Date to Transfer Custody of Voting Equipment.	0.1	15.00
40128216	01/05/24	Wiygul, Robert	Fulton County: Review and analyze Petitioners' application for extension of time to respond to Secretary's application to set transfer date; telephone conference with E. Kagedan regarding strategy; email to clients regarding Petitioners' application and strategy.	0.6	264.00
40128216	01/05/24	Wiygul, Robert	Fulton County: Review Order extending Petitioners' time to respond to Secretary's Application regarding Transfer Date; email to clients regarding same.	0.2	88.00
40128216	01/06/24	Kagedan, Eitan	Fulton County: Review correspondence from T. Carroll concerning application for extension.	0.1	30.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Review and confer regarding Petitioners' filing seeking additional extension of time to respond to application to schedule transfer of custody.	0.3	90.00
40128216	01/08/24	Wiygul, Robert	Fulton County: Email to R. Macias with update on scheduling of voting equipment pickup and request for telephone conference to discuss dispositive motion.	0.2	88.00
40128216	01/08/24	Wiygul, Robert	Fulton County: Review Petitioners' second request for extension of time to respond to Secretary's application to schedule Transfer Date; email to clients regarding same.	0.2	88.00
40128216	01/09/24	Kagedan, Eitan	Fulton County: Review Order setting transfer date, and related correspondence.	0.3	90.00
651718	01/10/24	Weinstein, Hillary B.	Review filings by Fulton County and Dominion regarding transport of voting machines.	0.1	44.00
40128216	01/11/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County matter and related cases.	0.1	44.00
40128216	01/11/24	Wiygul, Robert	Fulton County: Telephone conference with Dominion's counsel regarding schedule for pickup of voting equipment and contingency plans in event of Petitioners' non-compliance.	0.4	176.00
40128216	01/11/24	Wiygul, Robert	Fulton County: Telephone conference with Pro V&V's counsel regarding timing of equipment pickup.	0.2	88.00
40128216	01/12/24	Wiygul, Robert	Fulton County: Telephone call to Pro V&V's counsel regarding logistics of voting equipment pickup; email to counsel confirming January 19 Transfer Date and seeking confirmation of start time and location.	0.4	176.00
40128216	01/15/24	Wiygul, Robert	Fulton County: Draft status report regarding Transfer Date of Voting Equipment and letter to Special Master regarding her availability for a telephone conference on the Transfer Date.	0.5	220.00
40128216	01/16/24	Kagedan, Eitan	Fulton County: Review correspondence with T. Carroll concerning equipment pickup.	0.1	30.00
40128216	01/16/24	Hunter, Maria	Fulton County: Review and update Status Report to be submitted pursuant to Court Order.	0.5	75.00
40128216	01/16/24	Hunter, Maria	Fulton County: Review and update correspondence to Judge Jubelirer regarding transfer of election equipment.	0.2	30.00
40128216	01/16/24	Wiygul, Robert	Fulton County: Revise status report re Transfer Date and letter to Special Master regarding availability for a telephone conference; email to clients regarding same.	0.3	132.00
40128216	01/17/24	Wiygul, Robert	Fulton County: Review Special Master's Order granting leave to contact the Special Master during the transfer of the voting equipment to Pro V&V; emails to clients and H. Weinstein regarding same.	0.4	176.00
651718	01/17/24	Weinstein, Hillary B.	Strategy regarding observation of Pro V&V pickup of voting machines on January 19, 2024 in Fulton County.	0.3	132.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning equipment transfer and fee petition.	0.2	60.00
40128216	01/18/24	Wiygul, Robert	Fulton County: Prepare for transfer of Voting Equipment by reviewing pertinent orders and drafting email to Special Master providing notice that transfer has commenced.	0.6	264.00
40128216	01/18/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
40128216	01/18/24	Wiygul, Robert	Fulton County: Telephone conference with H. Weinstein regarding trip to Fulton County and weather.	0.1	44.00
40128216	01/19/24	Wiygul, Robert	Fulton County: Attend Pro V&V's inventorying and pickup of Dominion voting equipment in Fulton County (including round-trip travel between Philadelphia and Fulton County).	12.5	5,500.00
651718	01/19/24	Weinstein, Hillary B.	Travel to and from Fulton County to monitor transfer of voting machines to Pro V and V; monitor and observe transfer of voting machines to Pro V and V; draft correspondence to Commonwealth Court regarding transfer.	12.6	5,544.00
40128216	01/20/24	Wiygul, Robert	Fulton County: Review inventory documents from Pro V&V; login to video surveillance and review video from secondary inventorying process; draft lengthy emails to clients regarding Pro V&V's pickup of voting equipment.	0.9	396.00
40128216	01/25/24	Wiygul, Robert	Attend weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County case and related matters.	0.1	44.00
Total				557.30	191,705.00

Exhibit C - Expenditures of Legal-Professional Time
(Impoundment-related Proceedings)

Timekeeper	Hours	Amount
Wiygul, Robert	253.6	111,584.00
Kagedan, Eitan	138.1	41,430.00
Hill, John	37.3	9,325.00
Hunter, Maria	89.4	13,410.00
Pratt, Christine	0.9	135.00
Bompadre, Kristine	3.1	465.00
Mavroudis, Dimitri	19.9	8,756.00
Weinstein, Hillary B.	15.0	6,600.00

EXHIBIT D

Exhibit D - Expenditures of Legal-Professional Time
(U.S. Supreme Court Proceedings)

Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124341	06/14/23	Kagedan, Eitan	Fulton County: Conduct comprehensive review of Petition for Writ of Certiorari.	1.3	390.00
40124957	07/18/23	Kagedan, Eitan	Fulton County: Review Petitioners' petition for certiorari.	0.4	120.00
40124957	07/18/23	Wiygul, Robert	Fulton County: Email to clients transmitting Petitioners' petition for writ of certiorari.	0.2	88.00
40125561	08/04/23	Hunter, Maria	Fulton County: Review of U.S. Supreme Court docket report and update matter calendar with relevant response date.	0.1	15.00
40125561	08/04/23	Wiygul, Robert	Fulton County: Review and analyze Petitioners' cert petition and SCOTUS rules regarding conference dates; email clients regarding same.	0.7	308.00
40125561	08/09/23	Wiygul, Robert	Fulton County: Review SCOTUS docket and draft waiver of right to respond to Petitioners' petition for writ of certiorari; email to clients regarding same.	0.4	176.00
40125561	08/10/23	Wiygul, Robert	Fulton County: Finalize and file waiver of right to respond to petition for writ of certiorari; email to other parties' counsel regarding same.	0.3	132.00
40125561	08/22/23	Wiygul, Robert	Fulton County: Review Dominion's waiver of right to respond to Petitioners' petition for writ of certiorari; email to clients regarding same.	0.2	88.00
40126225	09/13/23	Wiygul, Robert	Fulton County: Review notification that Petitioners' cert petition was distributed to the Supreme Court justices for consideration; email to clients regarding same.	0.2	88.00
40126865	10/10/23	Kagedan, Eitan	Fulton County: Review correspondence concerning denial of Petitioners' Petition for Cert.	0.1	30.00
Total				3.90	1,435.00

Timekeeper	Hours	Amount
Wiygul, Robert	2.0	880.00
Kagedan, Eitan	1.8	540.00
Hunter, Maria	0.1	15.00

EXHIBIT E

Exhibit E - Expenditures of Legal-Professional Time
(First and Second Supplemental Fee Applications)

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40124341	06/02/23	Hunter, Maria	Fulton County: Review of Order granting Leave to File Supplemental Application for Fees, and update matter calendar with relevant deadlines.	0.1	15.00
40124341	06/05/23	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning updates to escrow agent search and plan for supplemental fee petition.	0.2	60.00
40124341	06/05/23	Kagedan, Eitan	Fulton County: Draft Affidavit of R. Macias in support of Supplemental Fee Application.	0.6	180.00
650706	06/05/23	Mavroudis, Dimitri	Correspondence with R. Wiygul regarding collection and production of TLG invoices for submission in supplemental application for attorneys' fees.	0.1	44.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Revise affidavit of Ryan Macias in support of supplemental fee application; email to R. Macias regarding same; draft affidavit of D. Mavroudis in support of supplemental fee application; email to D. Mavroudis regarding same; draft affidavit of R. Wiygul in support of supplemental fee application.	0.9	396.00
40124341	06/06/23	Wiygul, Robert	Fulton County: Draft supplemental application for fees and costs.	2.4	1,056.00
40124341	06/07/23	Kagedan, Eitan	Fulton County: Review, revise, and comment on draft supplemental fee application and affidavit of R. Wiygul in support thereof.	1.0	300.00
40124341	06/07/23	Kagedan, Eitan	Fulton County: Review R. Macias edits to draft affidavit in support of supplemental application.	0.1	30.00
40124341	06/07/23	Hunter, Maria	Fulton County: Review of Hangley Aronchick Segal Pudlin & Schiller's invoice for May 2023, and draft chart of fees and costs in support of Supplemental Application for Fees and Costs.	1.9	285.00
40124341	06/07/23	Hunter, Maria	Fulton County: Review of D. Mavroudis Affidavit in support of Supplemental Application for Fees and Costs, and prepare exhibit in support.	0.2	30.00
40124341	06/07/23	Hunter, Maria	Fulton County: Redact personal information and time entries not being submitted for recovery in Supplemental Application for Fees and Costs.	0.3	45.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Analyze May 2023 invoice to identify time entries that are not compensable under the Pa. Supreme Court's order and entries that are only partially compensable, in support of supplemental application for costs and fees.	0.3	132.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Telephone conference with R. Macias regarding potential escrow agents and affidavit in support of supplemental fee application; review and revise updated Macias affidavit and email R. Macias regarding same.	0.5	220.00
40124341	06/07/23	Wiygul, Robert	Fulton County: Revise supplemental application for fees and supporting Wiygul Affidavit; email to clients regarding same.	0.9	396.00
40124341	06/08/23	Kagedan, Eitan	Fulton County: Review and suggest edits on fee and cost backups for supplemental application.	0.6	180.00
40124341	06/08/23	Hunter, Maria	Fulton County: Review and update references to case law and pleadings relied upon in Supplemental Application for Fees and Costs.	0.4	60.00
40124341	06/08/23	Hunter, Maria	Fulton County: Review and redact non-reimbursable costs in advance of finalizing Supplemental Application for Fees and Costs.	0.1	15.00
40124341	06/08/23	Wiygul, Robert	Weekly videoconference with clients, OAG, and SUDC to discuss status of Fulton County and related matters.	0.1	44.00
40124341	06/08/23	Wiygul, Robert	Fulton County: Review and revise drafts of Exhibits B and C to Wiygul affidavit in support of supplemental application for fees and costs.	0.3	132.00
40124341	06/09/23	Kagedan, Eitan	Review redactions to time entries and confirm calculations in support of supplemental fee petition.	1.0	300.00
40124341	06/09/23	Hunter, Maria	Fulton County: Review invoice for entries relating to non-compensable work in advance of finalizing Supplemental Application for Fees and Costs.	0.2	30.00
40124341	06/09/23	Hunter, Maria	Fulton County: Review and update exhibits in support of Supplemental Application for Fees and Costs.	0.9	135.00
40124341	06/09/23	Hunter, Maria	Fulton County: Review, update, finalize and file The Secretary's Supplemental Application for an Award of Fees and Costs Pursuant to The Special Master's Order Dated June 2, 2023.	0.8	120.00
40124341	06/09/23	Wiygul, Robert	Fulton County: Revise and finalize supplemental application for award of costs and fees; communications with M. Hunter regarding same.	0.8	352.00
40124341	06/13/23	Hunter, Maria	Fulton County: Communications with Clerk of Commonwealth Court regarding Praecipe to Amend.	0.1	15.00
40124341	06/13/23	Hunter, Maria	Fulton County: Draft Praecipe to Attach Amended Exhibit to Supplemental Application for Award of Fees and Costs.	0.3	45.00
40124341	06/13/23	Hunter, Maria	Fulton County: Prepare Amended Exhibit C to Supplemental Application.	0.1	15.00
40124341	06/13/23	Hunter, Maria	Fulton County: Review, update, finalize and submit Praecipe to Attach Amended Exhibit to Supplemental Application.	0.3	45.00
40124341	06/13/23	Wiygul, Robert	Fulton County: Draft praecipe to substitute corrected exhibit to supplemental application for fees and costs; emails with clients and team regarding same.	1.0	440.00
40126225	09/11/23	Wiygul, Robert	Fulton County: Conference with E. Kagedan regarding research in support of compensability of fees incurred on appeal and in certiorari proceedings before SCOTUS in support of forthcoming application for fees and costs.	0.1	44.00
651406	10/03/23	Weinstein, Hillary B.	Research regarding attorneys fees warranted for defense of attorneys' fees award on appeal.	1.9	836.00
40126865	10/05/23	Wiygul, Robert	Fulton County: Telephone conference with H. Weinstein regarding her research regarding compensability of time spent at cert-petition stage in support of forthcoming fee application.	0.3	132.00
651406	10/05/23	Weinstein, Hillary B.	Finalize research regarding ability to recover attorneys' fees on appellate matter; call with R. Wiygul regarding same.	1.5	660.00
40127698	12/04/23	Hunter, Maria	Fulton County: Review of time entries for time period of June through October 2023 in advance of drafting Supplemental Fee Application.	1.6	240.00
40127698	12/06/23	Hunter, Maria	Fulton County: Continued review of invoices and costs, and update chart of fees for Supplemental Fee Application.	1.5	225.00

Exhibit E - Expenditures of Legal-Professional Time
(First and Second Supplemental Fee Applications)

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40127698	12/07/23	Hunter, Maria	Fulton County: Continued review, categorization and identification of time entries and costs for inclusion in Supplemental Fee Application.	3.4	510.00
40127698	12/08/23	Hunter, Maria	Fulton County: Review and update costs in chart tracking time and costs, in advance of drafting Supplemental Fee Application.	1.3	195.00
40127698	12/14/23	Hunter, Maria	Fulton County: Review of draft chart of time entries and costs in advance of submission of Supplemental Fee Application.	1.2	180.00
40127698	12/14/23	Wiygul, Robert	Fulton County: Telephone conference with M. Hunter regarding exhibit to second supplemental application for fees itemizing and describing reimbursable costs.	0.1	44.00
40127698	12/18/23	Hunter, Maria	Fulton County: Review and update chart of costs for inclusion in Supplemental Fee Application.	0.2	30.00
40127698	12/19/23	Kagedan, Eitan	Fulton County: Begin identifying costs and fees for inclusion in supplemental fee application.	1.7	510.00
40127698	12/19/23	Hunter, Maria	Fulton County: Review and update chart of time entries and costs, and supporting materials, in advance of drafting Supplemental Fee Application.	1.6	240.00
40127698	12/20/23	Kagedan, Eitan	Fulton County: Review correspondence from R. Wiygul concerning fee application.	0.1	30.00
40127698	12/20/23	Kagedan, Eitan	Fulton County: Continue work identifying and categorizing compensable fee entries.	1.5	450.00
40127698	12/20/23	Hunter, Maria	Fulton County: Review and update chart of fees and costs for inclusion in Supplemental Fee Application.	0.7	105.00
40127698	12/20/23	Wiygul, Robert	Fulton County: Review and revise spreadsheet of time entries from 6/1/2023 through 10/31/2023 to identify time compensable under SCOPA's sanctions order, in support of second supplemental application for fees; email to M. Hunter and E. Kagedan regarding same.	1.2	528.00
40127698	12/21/23	Hunter, Maria	Fulton County: Communications with counsel regarding inclusion of November entries in current Supplemental Fee Application.	0.1	15.00
40127698	12/21/23	Hunter, Maria	Fulton County: Review and update chart of time entries and costs to include November invoice in advance of drafting Supplemental Fee Application.	0.3	45.00
40128216	01/02/24	Kagedan, Eitan	Fulton County: Add detail to descriptions of costs for supplemental fee application.	1.2	360.00
40128216	01/02/24	Kagedan, Eitan	Fulton County: Allocate November time among three categories for supplemental fee application and complete addition of detail to cost portion of spreadsheet.	0.7	210.00
40128216	01/03/24	Hunter, Maria	Fulton County: Communications with counsel regarding addition of December time to draft Application for Fees.	0.1	15.00
40128216	01/04/24	Kagedan, Eitan	Fulton County: Continue adding detail for fee application.	1.6	480.00
40128216	01/04/24	Hunter, Maria	Fulton County: Review and update Chart of Time Entries and Costs for inclusion in Supplement Fee Application.	0.8	120.00
40128216	01/05/24	Kagedan, Eitan	Fulton County: Continue revising and supplementing cost and fees spreadsheet in support of fee application, including conferring with R. Wiygul, and drafting correspondence to R. Macias, and H. Weinstein concerning same.	2.3	690.00
40128216	01/05/24	Hunter, Maria	Fulton County: Review and update chart of time entries and costs for inclusion in Supplemental Fee Application, including by adding time entries for December.	0.9	135.00
40128216	01/06/24	Wiygul, Robert	Fulton County: Review and revise updated versions of exhibits (now including time entries from November and December 2023) to Second Supplemental fee application itemizing and describing compensable fees and costs and breaking them out into various categories.	1.2	528.00
40128216	01/06/24	Wiygul, Robert	Fulton County: Begin drafting second supplemental application for award of fees and costs; related research regarding compensability of certain categories of fees.	3.4	1,496.00
40128216	01/07/24	Kagedan, Eitan	Fulton County: Review and respond to R. Macias correspondence concerning affidavit in support of fee application.	0.2	60.00
40128216	01/07/24	Kagedan, Eitan	Fulton County: Review correspondence from R. Wiygul concerning fee and cost designations.	0.1	30.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Draft Macias affidavit in support of second supplemental fee application.	1.9	570.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Draft affidavits of H. Weinstein, C. Pratt, and K. Bompadre in support of second supplemental fee application.	1.1	330.00
40128216	01/08/24	Kagedan, Eitan	Fulton County: Review R. Wiygul edits to spreadsheet of compensable fees and costs.	0.4	120.00
40128216	01/08/24	Wiygul, Robert	Fulton County: Review, revise and supplement draft affidavits of C. Pratt, K. Bompadre, and R. Macias in support of second supplemental application for fees and costs; draft affidavit of R. Wiygul in support of same; email to E. Kagedan identifying questions and discussing next steps.	2.3	1,012.00
40128216	01/09/24	Kagedan, Eitan	Fulton County: Review and respond to R. Wiygul comments to draft affidavits in support of second supplemental fee application.	0.6	180.00
40128216	01/09/24	Kagedan, Eitan	Fulton County: Review H. Weinstein additions to affidavit in support of fee application.	0.4	120.00
651718	01/09/24	Weinstein, Hillary B.	Draft affidavit in support of application for fees.	0.7	308.00
40128216	01/10/24	Kagedan, Eitan	Fulton County: Draft correspondence to timekeepers to secure signatures on affidavits in support of second supplemental fee petition.	0.2	60.00
40128216	01/10/24	Kagedan, Eitan	Fulton County: Review correspondence concerning confirmation of costs paid for supplemental fee petition.	0.1	30.00
40128216	01/10/24	Hunter, Maria	Fulton County: Communications with accounting regarding payment status of invoices in advance of submission of Second Supplemental Application for Fees and Costs.	0.1	15.00
40128216	01/11/24	Kagedan, Eitan	Fulton County: Revise Macias affidavit in support of supplemental fee application and circulate revised version for signature.	0.3	90.00
40128216	01/12/24	Wiygul, Robert	Fulton County: Continue drafting second supplemental application for an award of fees and costs.	0.8	352.00
40128216	01/15/24	Wiygul, Robert	Fulton County: Finish drafting Second Supplemental Application for fees and costs.	1.0	440.00
40128216	01/16/24	Wiygul, Robert	Fulton County: Revise second supplemental fee application; email to clients regarding same.	0.4	176.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Follow up with H. Weinstein concerning affidavit in support of supplemental fee application.	0.1	30.00

Exhibit E - Expenditures of Legal-Professional Time
(First and Second Supplemental Fee Applications)

HASPS Invoice	Date	Timekeeper	Description	Reimbursable Hours	Reimbursable Amount
40128216	01/18/24	Kagedan, Eitan	Fulton County: Provide additional detail on redactions for research charges in support of supplemental fee application.	0.9	270.00
40128216	01/18/24	Kagedan, Eitan	Fulton County: Review draft supplemental fee application.	0.2	60.00
40128216	01/18/24	Hunter, Maria	Fulton County: Review and redact confidential and personal information contained in cost back up for inclusion in Second Supplemental Fee Application.	2.8	420.00
40128216	01/18/24	Hunter, Maria	Fulton County: Review and redact non-compensable time entries and annotate certain time entries for inclusion in Second Supplemental Fee Application.	1.8	270.00
40128216	01/18/24	Wiygul, Robert	Fulton County: Communications with E. Kagedan and M. Hunter regarding finalizing second supplemental application for fees and costs; review proposed redactions to documentation of costs; review affidavit of H. Weinstein in support of application.	0.7	308.00
40128216	01/19/24	Kagedan, Eitan	Fulton County: Confirm accuracy and suggest revisions to cost backups in support of supplemental fee petition.	0.6	180.00
40128216	01/19/24	Hunter, Maria	Fulton County: Review and update redactions to legal research back-up for inclusion in Second Supplemental Fee Application.	0.2	30.00
40128216	01/22/24	Kagedan, Eitan	Fulton County: Review proposed redactions for backups in support of supplemental fee petition.	1.7	510.00
40128216	01/22/24	Hunter, Maria	Fulton County: Review and update redaction to costs for inclusion in Second Supplemental Fee Application.	0.2	30.00
40128216	01/22/24	Wiygul, Robert	Fulton County: Revise Wiygul affidavit in support of second supplemental fee application; revise and supplement application in response to client comments.	1.6	704.00
40128216	01/23/24	Kagedan, Eitan	Fulton County: Review draft supplemental application for fees and Wiygul affidavit in support thereof.	0.9	270.00
40128216	01/23/24	Kagedan, Eitan	Fulton County: Review and confirm accuracy of figures in Supplemental Fee Petition.	1.0	300.00
40128216	01/23/24	Hunter, Maria	Fulton County: Review and update redactions to costs for inclusion in Second Supplemental Fee Application.	1.5	225.00
40128216	01/23/24	Hunter, Maria	Fulton County: Review and update references to case law, pleadings and documents relied upon in Second Supplemental Fee Application.	1.2	180.00
40128216	01/23/24	Hunter, Maria	Fulton County: Review and update chart of time entries and costs for inclusion in Second Supplemental Fee Application.	0.5	75.00
40128216	01/23/24	Wiygul, Robert	Fulton County: Review near-final version of spreadsheets and exhibits in support of Second Supplemental Application for fees; email to M. Hunter regarding revisions to same; revise Second Supplemental Application per M. Hunter's comments.	0.6	264.00
40128216	01/24/24	Kagedan, Eitan	Fulton County: Review revisions to Fee Application and supporting documents.	0.4	120.00
40128216	01/24/24	Hunter, Maria	Fulton County: Continued review and redactions of confidential and non-compensable items listed in invoices, in advance for inclusion in Second Supplemental Fee Application.	0.9	135.00
40128216	01/24/24	Hunter, Maria	Fulton County: Review and update chart of time entries and costs to include required summaries and data for inclusion in Second Supplemental Fee Application.	0.9	135.00
40128216	01/25/24	Kagedan, Eitan	Fulton County: Confer with R. Wiygul concerning recommendation regarding timing of fee petition filing.	0.1	30.00
40128216	01/25/24	Wiygul, Robert	Fulton County: Revise second supplemental application for fees and costs and email updated draft to clients with questions.	0.4	176.00

Total 78.80 22,785.00

Timekeeper	Hours	Amount
Wiygul, Robert	21.3	9,372.00
Kagedan, Eitan	23.8	7,140.00
Hunter, Maria	29.5	4,425.00
Mavroudis, Dimitri	0.1	44.00
Weinstein, Hillary B.	4.1	1,804.00

EXHIBIT F

Exhibit F - Itemization and Description of Litigation Costs

Invoice	Date/Period	Description	Detail	Item Amount	Backup Exhibit No.
40124341	6/6/2023	Legal Research	Research in support of supplemental application for fees and costs.	55.73	Exhibit F_001
40124341	6/19/2023	Legal Research	Research information available on Westlaw concerning proposed escrow agents and executives for each.	187.92	Exhibit F_001
40124341	Jun-23	Outside Professional Services	Expert time reviewing, revising, and supplementing affidavit in support of Secretary's Fee Application.	125.00	Exhibit F_002 Macias Ex. 1
40124957	7/18/2023-7/28/2023	Legal Research	Research case law in support of Application to Appoint Escrow Agent	1,694.74	Exhibit F_003
40124957	Jul-23	Outside Professional Services	Expert time reviewing, revising, and supplementing and editing affidavit in support of Application to Appoint Escrow Agent.	1,500.00	Exhibit F_004 Macias Ex. 1
40125561	8/3/2023	Legal Research	Research regarding notices to attend and scope of persons subject to notice to attend.	988.00	Exhibit F_006
40125561	8/4/2023	Legal Research	Research lines of caselaw cited in Petitioners' cert petition.	140.00	Exhibit F_006
40125561	8/1/2023-8/29/2023	Legal Research	Research in support of pre-hearing submissions and briefs (including motions in limine and responses to Petitioners' pre-hearing submissions)	5,727.99	Exhibit F_005- Exhibit F_007
40125561	8/28/2023-8/31/2023	Legal Research	Research in response to procedural and evidentiary issues raised during evidentiary hearing	1,005.27	Exhibit F_005- Exhibit F_007
40125561	8/30/2023	Legal Research	Research in support of SCOPA response to Petitioners' Application to Stay	334.37	Exhibit F_005- Exhibit F_007
40125561	Aug-23	Outside Professional Services	\$4,250 - Expert review of and discussion with counsel concerning Affidavit and supporting material in preparation for testimony; \$11,200 - Expert time in connection with testimony in hearing on appointment of escrow agent; \$962.50 - Travel to Harrisburg for hearing on appointment of escrow agent; \$1,841.24 - Reimbursable Travel Costs incident to travel to Harrisburg for hearing on appointment of escrow agent.	18,253.74	Exhibit F_008- Exhibit F_049 Macias Ex. 1
40125561	8/9/23 - 8/22/23	Service of Process	Service of subpoenas on Eldon Martin and Patricia Hess to ensure attendance at hearing on appointment of escrow agent.	292.47	Exhibit F_050- Exhibit F_055
40125561	8/16/2023	Witness Fees	Witness fees for E. Martin and P. Hess for attendance at hearing on appointment of escrow agent.	31.04	Exhibit F_098- Exhibit F_101
40125561	8/28/23 - 8/31/23	Transcript of Testimony	Hearing transcripts	4,206.15	Exhibit F_056- Exhibit F_058
40125561	8/28/23 - 8/29/23	Travel Air/Rail	Travel to and from Harrisburg by counsel and paralegal for appearance at hearing on appointment of escrow agent.	191.00	Exhibit F_059- Exhibit F_068
40125561	8/26/23 - 8/31/23	Travel Auto/Cab Fare	Travel to and from Harrisburg by counsel and paralegal for appearance at hearing on appointment of escrow agent.	651.47	Exhibit F_069- Exhibit F_092
40125561	8/28/2023	Travel Auto/Cab Fare	Travel to and from Harrisburg by counsel for appearance at hearing on appointment of escrow agent.	172.53	Exhibit F_093
40125561	8/27/23 - 8/31/23	Travel Hotel	Hotel costs for counsel and paralegal in Harrisburg in connection with hearing on appointment of escrow agent.	1,455.86	Exhibit F_094- Exhibit F_097
40125561	8/27/23 - 8/31/23	Meals	Meals incident to appearance at hearing on appointment of escrow agent.	466.04	Exhibit F_102- Exhibit F_110
40126865	Sep-23	Outside Professional Services	Expert time reviewing and consulting with counsel concerning Final Appointment Order (\$875); Travel from Harrisburg for hearing on appointment of escrow agent (\$1,662.50)	2,537.50	Exhibit F_111 Macias Ex. 1
40126865	Oct-23	Outside Professional Services	Expert time reviewing and consulting with counsel concerning Final Appointment Order	250.00	Exhibit F_112 Macias Ex. 1
40127698	12/8/2023	Legal Research	Research in support of opposition to Petitioners' SCOPA application challenging Final Appointment Order.	485.57	Exhibit F_113
40128216	1/6/2024	Legal Research	Research concerning compensability of certain categories of fees, in support of second supplemental fee application	278.64	Exhibit F_114- Exhibit F_115
40128216	Jan-24	Outside Professional Services	\$687.50 - Identification of time entries and review of supporting materials for second supplemental fee application; \$1,000 - Observation of voting equipment impoundment; \$2,800 - Travel time to/from Fulton County for observation of transfer of election equipment to Pro V&V custody; \$1,493.01 - Reimbursable Travel Costs incident to travel to/from Fulton County for observation transfer of election equipment to Pro V&V custody	5,980.51	Exhibit F_116- Exhibit F_135 Macias Ex. 1
40128216	1/19/2024	Meals	Meal incident to appearance in Fulton County for transfer of election equipment to Pro V&V custody	5.14	Exhibit F_141
40128216	1/21/2024	Travel Auto/Cab Fare	Travel to and from Fulton County by counsel for observation of transfer of election equipment to Pro V&V custody	271.00	Exhibit F_136- Exhibit F_140

Total 47,287.68

[REDACTED]

Date Range: June 01, 2023 - June 30, 2023

Report Format: Summary-Account by Client by User by Day (Targeted)

Products: Westlaw, Westlaw Retired

Content Families: All Content Families

[illegible]

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2023_June
DATE: July 7, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
.5	Hours	Consulting hours worked on Pennsylvania Election Reviews (affidavit in support of the Secretary's application for fees)	\$250	\$125.00

Total \$125.00

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA [REDACTED]
Date Range: July 01, 2023 - July 31, 2023
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED] Client 28000-050 User Name BOMPADRE,KRISTINE (22447279) Day 07/28/2023								
Totals for Included		10			1,610.00 USD	322.00 USD	25.76 USD	347.76 USD
Totals for Day 07/28/2023		10			1,610.00 USD	322.00 USD	25.76 USD	347.76 USD
[REDACTED] User Name WIYGUL,ROBERT A (9372048) Day 07/18/2023		1						
Totals for Included		7			340.00 USD	68.00 USD	5.44 USD	73.44 USD
Totals for Day 07/18/2023		7			340.00 USD	68.00 USD	5.44 USD	73.44 USD
Day 07/19/2023								
Totals for Included		14			1,584.00 USD	316.80 USD	25.34 USD	342.14 USD
Totals for Day 07/19/2023		14			1,584.00 USD	316.80 USD	25.34 USD	342.14 USD
[REDACTED] [REDACTED] [REDACTED] Day 07/21/2023		1						
Totals for Included		26			1,548.00 USD	309.60 USD	24.77 USD	334.37 USD
Totals for Day 07/21/2023		26			1,548.00 USD	309.60 USD	24.77 USD	334.37 USD
[REDACTED] [REDACTED] [REDACTED] Day 07/27/2023		1						
Totals for Included		79			2,248.00 USD	449.60 USD	35.97 USD	485.57 USD
Totals for Day 07/27/2023		79			2,248.00 USD	449.60 USD	35.97 USD	485.57 USD
Day 07/28/2023								
Totals for Included		13			516.00 USD	103.20 USD	8.26 USD	111.46 USD
Totals for Day 07/28/2023		13			516.00 USD	103.20 USD	8.26 USD	111.46 USD
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]		1						
[REDACTED] [REDACTED]		1						

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2023_July
DATE: July 31, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
6	Hours	Consulting hours worked on Pennsylvania Election Reviews (affidavit for Application for Appointment of Escrow Agent)	\$250	\$1,500.00

Total \$1,500.00

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA
Date Range: August 01, 2023 - August 31, 2023
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: Client 28000-050 User Name HILL,JOHN B (18690333)								
Day 08/22/2023								
Totals for Included		16			2,316.00 USD	463.20 USD	37.06 USD	500.26 USD
Totals for Day 08/22/2023		16			2,316.00 USD	463.20 USD	37.06 USD	500.26 USD
Day 08/25/2023								
Totals for Included		22			1,990.00 USD	398.00 USD	31.84 USD	429.84 USD
Totals for Day 08/25/2023		22			1,990.00 USD	398.00 USD	31.84 USD	429.84 USD
Day 08/27/2023								
Totals for Included		6			1,542.00 USD	308.40 USD	24.67 USD	333.07 USD
Totals for Day 08/27/2023		6			1,542.00 USD	308.40 USD	24.67 USD	333.07 USD
Day 08/28/2023								
Totals for Included		10			1,990.00 USD	398.00 USD	31.84 USD	429.84 USD
Totals for Day 08/28/2023		10			1,990.00 USD	398.00 USD	31.84 USD	429.84 USD
Day 08/30/2023								
Totals for Included		15			1,548.00 USD	309.60 USD	24.77 USD	334.37 USD
Totals for Day 08/30/2023		15			1,548.00 USD	309.60 USD	24.77 USD	334.37 USD
User Name HUNTER,MARIA J (4847574)								
Day 08/08/2023								
Totals for Included		3			258.00 USD	51.60 USD	4.13 USD	55.73 USD
Totals for Day 08/08/2023		3			258.00 USD	51.60 USD	4.13 USD	55.73 USD
Day 08/17/2023								
Totals for Included		25			258.00 USD	51.60 USD	4.13 USD	55.73 USD
Totals for Day 08/17/2023		25			258.00 USD	51.60 USD	4.13 USD	55.73 USD
Day 08/21/2023								
Totals for Included		20			1,548.00 USD	309.60 USD	0.00 USD	309.60 USD
Totals for Day 08/21/2023		20			1,548.00 USD	309.60 USD	0.00 USD	309.60 USD

Content Families: All Content Families

Day 08/19/2023

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA (1000546111)
Date Range: August 01, 2023 - August 31, 2023
Report Format: Summary-Account by Client by User by Day (**Targeted**)
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

[illegible]

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2023_August
DATE: September 1, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
17	Hours	Consulting hours worked on Pennsylvania Election Reviews - Application to Appoint Escrow Agent (review of affidavit and supporting materials and conferences with counsel in preparation for testimony at hearing)	\$250	\$4,250.00
32	Hours	Testimony hours for Pennsylvania Election Reviews - Application to Appoint Escrow Agent (time at court during evidentiary hearing)	\$350	\$11,200.00
5.5	Hours	Travel hours for Pennsylvania Election Reviews - Application to Appoint Escrow Agent (time traveling to/from Harrisburg for Evidentiary Hearing)	\$175	\$962.50
		Reimbursable Travel Cost (See Attached)	N/A	\$1,841.24

Total \$18,253.74

The following costs are a summary of the itemized costs. All justification and receipts are included below.

Food:	\$ 42.00 (\$13+\$29)
Hotel:	\$716.14 (\$129.87+\$259.74+\$129.87+196.66)
Flight:	\$674.20
Travel to Harrisburg:	\$168.65
Travel in Harrisburg:	\$170.75 (\$12.97+\$14.35+\$16.9+\$11.93+\$9.12+\$13.41+\$14.92+\$16.91+\$14.4+\$16.3+\$29.54)
Travel to/in Philadelphia:	\$ 69.50 (\$35+\$34.50)

Traveler was already in DC, so traveler took a Lyft to Harrisburg. The cost was less expensive than any other alternative. While there was an Amtrak that could have gotten traveler to Harrisburg for \$148, traveler would have had to Uber/Lyft/taxi to Union Station (WAS) and from Harrisburg train station (HAR) which would have been approximately another \$50. Further, it was an additional 4+ hour of travel time at \$175/hour. Renting a car was almost identical in price, but traveler would have to pay for gas, Uber/Lyft/taxi to DCA to pick car up and from MDT where the car would be dropped off. All of this would have cost another approximately \$80. Therefore, traveler decided Lyft was the most cost-effective and efficient method of travel. (See justification on the next page.)

Due the fact that the hearing was extended into Thursday, traveler could not catch a flight after the hearing so had to fly out Friday. Since traveler had an obligation in California on Friday, traveler took an Amtrak to Philadelphia, stayed at the airport hotel, and flew to San Luis Obispo, California (SBP) Friday morning. All costs associated with this are included in the receipts below. (See justification on the third page.)

Itemized receipt for dinner on August 31st included non-reimbursable items. Traveler calculated only the reimbursable items – identified with a ‘-’ (hyphen) – which equated to \$26. Adding 9% tax and 20% tip, this equated to \$34, which is what Traveler has included in the reimbursement. Note that the charge was a hotel room charge so the full amount is reflected on the hotel folio, but has been removed from the cost of reimbursement Traveler is submitting.

Amtrak Reservations - Select

https://www.amtrak.com/tickets/departure.html

Join | Sign In | English | Need Help? Ask Jule

DESTINATIONS | EXPERIENCE | DEALS | SCHEDULES | GUEST REWARDS | TRAIN STATUS | MY TRIP

Multiple Trains	DEPARTS 11:25 ^a	ARRIVES 3:42 ^p	4h 17m 2 Segment	Coach from \$148	Business from \$186	Private Rooms Not Offered
Multiple Trains	DEPARTS 4:25 ^p	ARRIVES 8:45 ^p	4h 20m 2 Segment	Coach from \$120	Business from \$158	Private Rooms Not Offered
Multiple Trains	DEPARTS 2:12 ^p	ARRIVES 6:45 ^p	4h 33m 2 Segment	Coach from \$148	Business Not Offered	Private Rooms Sold Out
Multiple Trains	DEPARTS 7:50 ^a	ARRIVES 12:45 ^p	4h 55m 2 Segment	Coach from \$148	Business Not Offered	Private Rooms Sold Out
Multiple Trains	DEPARTS 9:15 ^a	ARRIVES 2:26 ^p	5h 11m 2 Segment	Coach from \$178	Business from \$155	Private Rooms Not Offered

Back CONTINUE

Select Vehicle | Costco Travel

https://www.costcotravel.com/h=3002

(DCA) Ronald Reagan Washington National Airport, DC
Aug 27, 2023, 10:00 AM - Aug 27, 2023, 02:00 PM Drop off: (MDT) Harrisburg International, PA

Car Agencies: ☐ Avis ☐ Budget

Need Help? Call 1-866-921-7925
Weekdays 07:00 AM - 07:00 PM
Weekends 09:00 AM - 05:00 PM
855-667-7925

Economy Car	—	\$167	\$166 Lowest Price	—
Compact Car	—	\$167	\$166 Lowest Price	—
Intermediate Car	—	\$182 Lowest Price	\$182	—
Standard Car	—	\$198 Lowest Price	\$198	—

Economy Car

5 2

Kia Rio or similar

- Unlimited mileage
- Geographic and Other Restrictions
- Additional Driver Included
- AUTOMATIC transmission, Air conditioning

☒ The price includes savings of up to 30% off Budget base rates.

Reserve Now, Pay Later
No Cancellation Fees

[Price Details](#)
\$165.69
Total Rental Price

[Terms & Conditions](#)

Continue

Flights from MDT-SBP

Browser tabs: Daily News, CISA, Republic, Election, Donald, Trump, AP, Trump, Doug, Arizona, Ex-real, Flight |

URL: https://www.aa.com/booking/choose-flights/1

Calendar: Tue, Aug 29, Wed, Aug 30, **Thu, Aug 31 \$675**, Fri, Sep 1 \$675, Sat, Sep 2 \$675, Sun, Sep 3 \$675, Mon, Sep 4 \$675

Filter by: Stops American Airlines 40 results

Depart	Arrive	Duration	Main Cabin	First
MDT 6:49 AM MDT - DFW = AA 674 = 319-Airbus A319 DFW - SBP = AA 1754 = 319-Airbus A319 Details Seats	SBP 11:32 AM	7h 43m 1 stop	One way \$675 2 seats left	Not available
MDT 1:59 PM MDT - PHL = AA 5905 = E175-Embraer E175-145 Operated by Piedmont Airlines as American Eagle PHL - DFW = AA 451 = 321-Airbus A321 DFW - SBP = AA 1765 = 319-Airbus A319 Details Seats	SBP 9:01 PM	10h 2m 2 stops	One way \$679 3 seats left	One way \$1,199 2 seats left
<small>⚠ Please note connection time. Change terminals. The class of service you searched may not be available on one or more flights. Economy only on 1 or more flights.</small>				
MDT 8:45 AM MDT - CLT = AA 5403 = CRJ-Canadair RJ 900 Details Seats	SBP 3:58 PM	10h 13m 2 stops	One way \$1,063 3 seats left	One way \$1,913 2 seats left

Cost of flights from PHL-DFW. which would have resulted in Traveler missing the obligation in California

Browser tabs: Daily News, CISA, Republic, Election, Donald, Trump, AP, Trump, Doug, Arizona, Ex-real, Flight |

URL: https://www.aa.com/booking/choose-flights/1

Filter by: Stops American Airlines 40 results

Depart	Arrive	Duration	Main Cabin	First
MDT 8:45 AM MDT - CLT = AA 5403 = CRJ-Canadair RJ 900 Operated by PSA Airlines as American Eagle CLT - DFW = AA 701 = 321-Airbus A321 Details Seats	DFW 1:31 PM	5h 46m 1 stop	One way \$520 3 seats left	One way \$760
MDT 8:45 AM MDT - CLT = AA 5403 = CRJ-Canadair RJ 900 Operated by PSA Airlines as American Eagle CLT - DFW = AA 840 = 321-Airbus A321 Details Seats	DFW 2:59 PM	7h 14m 1 stop	One way \$520 2 seats left	One way \$760
MDT 8:45 AM MDT - CLT = AA 5403 = CRJ-Canadair RJ 900 Operated by PSA Airlines as American Eagle CLT - DFW = AA 877 = 321-Airbus A321 Details Seats	DFW 4:21 PM	8h 36m 1 stop	One way \$728 2 seats left	Not available

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Jacqueline on August 27
Date: Sunday, August 27, 2023 1:47:10 PM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Sun, Aug 27, 2023, 1:45 PM
Subject: Your ride with Jacqueline on August 27
To: [REDACTED]

Lyft Pink



AUGUST 27, 2023 AT 11:20 AM

Thanks for riding with Jacqueline!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (115.04mi, 2h 19m 6s)	\$138.76
Lyft Pink member-exclusive savings	-\$7.33
DC City Fee	\$7.89
Tip	\$29.33



Visa *9429

\$168.65

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 27, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



☐ **Pickup** 11:20 AM

☐ **Drop-off** 1:39 PM

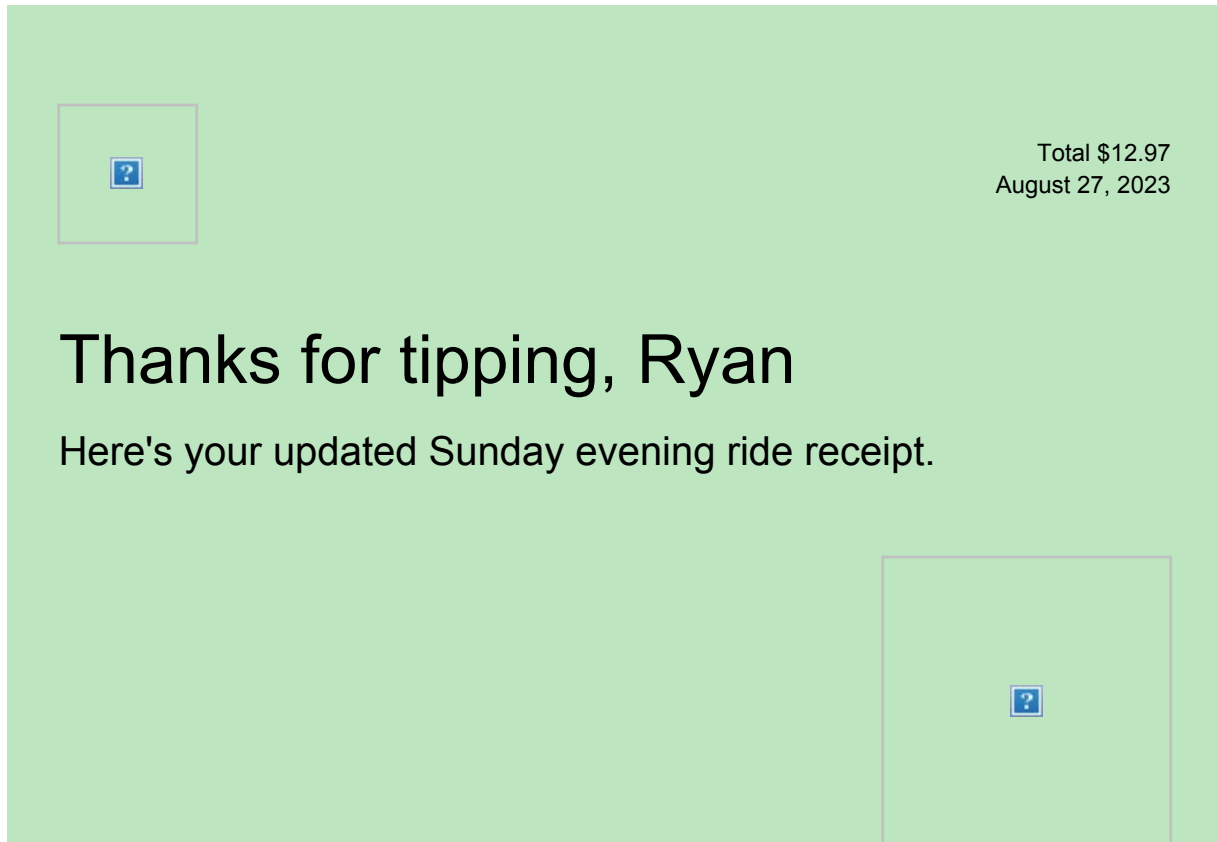
4650 Lindle Rd Harrisburg, PA

Tip driver

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Sunday evening trip with Uber
Date: Sunday, August 27, 2023 10:09:16 PM

----- Forwarded message -----

From: **Uber Receipts** <noreply@uber.com>
Date: Sun, Aug 27, 2023, 6:30 PM
Subject: [Personal] Your Sunday evening trip with Uber
To: <[REDACTED]>



Total	\$12.97
-------	---------

Trip fare	\$8.86
-----------	--------

Subtotal	\$8.86
----------	--------

Booking Fee <input type="checkbox"/>	\$2.11
Tips	\$2.00

Payments



Work - Chase Sapphire ••••9429

8/27/23 6:30 PM

\$12.97

[Switch Payment Method](#)

[Download PDF](#)

You rode with JOSEPH

4.95 ☐ Rating



Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX

5.22 miles | 7 min



6:10 PM

4650 Lindle Rd, Harrisburg, PA 17111, US



6:18 PM

1 N Second St, Harrisburg, PA 17101, US

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Zakir on August 27
Date: Sunday, August 27, 2023 9:56:18 PM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Sun, Aug 27, 2023, 9:50 PM
Subject: Your ride with Zakir on August 27
To: [REDACTED]

Lyft Pink



AUGUST 27, 2023 AT 9:25 PM

Thanks for riding with Zakir!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (6.61mi, 16m 45s)	\$12.99
Lyft Pink member-exclusive savings	-\$0.64
Tip	\$2.00



Visa *9429

\$14.35

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 27, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



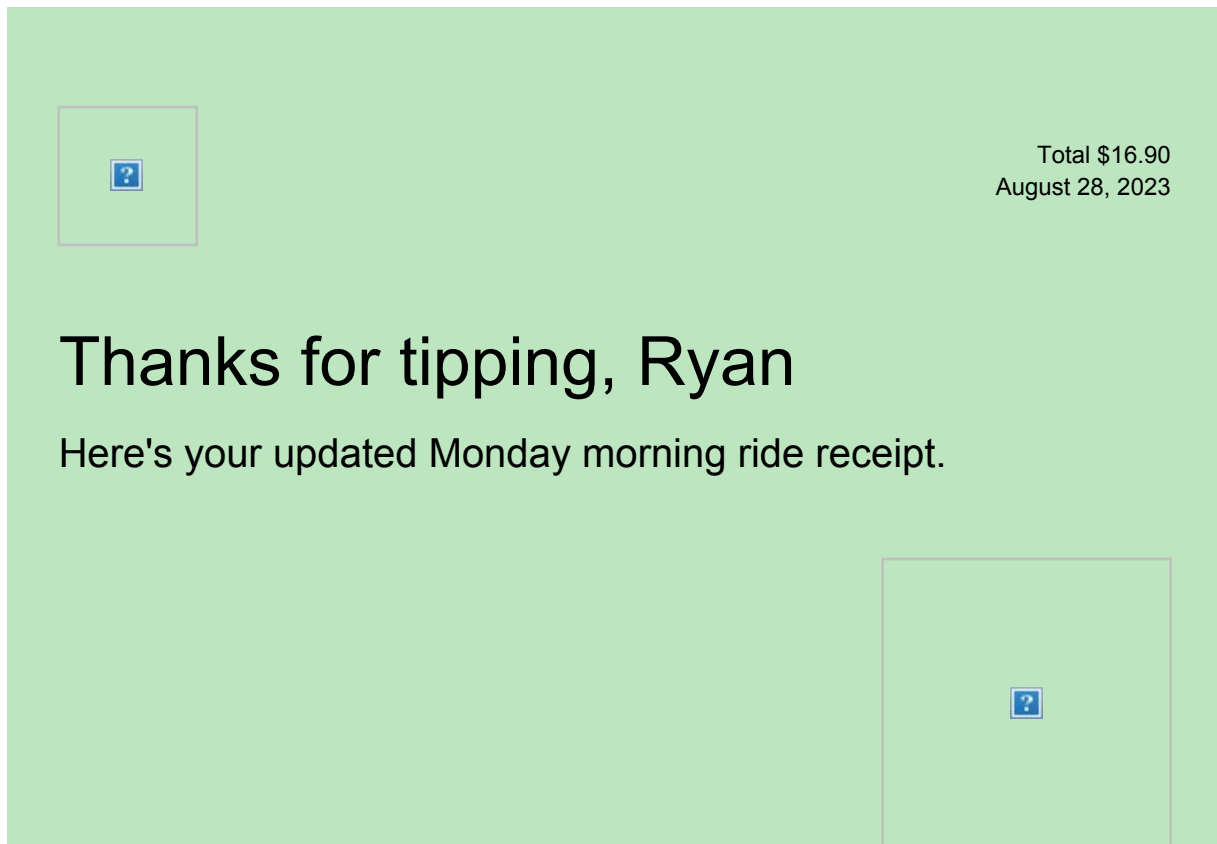
- ☐ **Pickup 9:25 PM**
1 N 2nd St, Harrisburg, PA
- ☐ **Drop-off 9:42 PM**
4650 Lindle Rd Harrisburg, PA

Tip driver

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Monday morning trip with Uber
Date: Monday, August 28, 2023 8:48:34 AM

----- Forwarded message -----

From: **Uber Receipts** <noreply@uber.com>
Date: Mon, Aug 28, 2023, 8:42 AM
Subject: [Personal] Your Monday morning trip with Uber
To: [REDACTED]



Total	\$16.90
--------------	----------------

Trip fare	\$11.51
-----------	---------

Subtotal	\$11.51
----------	---------

Booking Fee ☐ \$2.39

Tips \$3.00

Payments



Work - Chase Sapphire ••••9429

8/28/23 8:41 AM

\$16.90

[Switch Payment Method](#)

[Download PDF](#)

You rode with FELICIA

4.92 ☐ Rating

☐ Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX

6.52 miles | 12 min



8:13 AM

4650 Lindle Rd, Harrisburg, PA 17111, US



8:25 AM

601 Commonwealth Ave, Harrisburg, PA 17120, US

Sheraton Harrisburg Hershey
4650 Lindle Road
Harrisburg, PA 17111
United States
Tel: 717-564-5511 Fax: 717-564-6173



RYAN MACIAS

Page Number : 1 Invoice Nbr : 1000122255
Guest Number : 1192870
Folio ID : A
Arrive Date : 08-27-2023 13:41
Depart Date : 08-28-2023 16:00
No. Of Guest : 1
Room Number : 448
Marriott Bonvoy Number : [REDACTED]

Information Invoice

Tax ID :

Sheraton Harri HARS1 AUG-28-2023 02:50 9999

Date	Reference	Description	Charges (USD)	Credits (USD)
08-27-2023	RT448	Room Chrg - Govt./Military	117.00	
08-27-2023	RT448	State Tax	7.02	
08-27-2023	RT448	County Tax	5.85	
AUG-28-2023	VI	Visa		-129.87
** Total			129.87	-129.87
*** Balance			0.00	

I agreed to pay all room & incidental charges.

Continued on the next page

Sheraton Harrisburg Hershey
4650 Lindle Road
Harrisburg, PA 17111
United States
Tel: 717-564-5511 Fax: 717-564-6173



RYAN MACIAS

Page Number	:	2	Invoice Nbr	:	1000122255
Guest Number	:	1192870			
Folio ID	:	A			
Arrive Date	:	08-27-2023	13:41		
Depart Date	:	08-28-2023	16:00		
No. Of Guest	:	1			
Room Number	:	448			
Marriott Bonvoy Number	:				

For your convenience, we have prepared this zero-balance folio indicating a \$0 balance on your account. Please be advised that any charges not reflected on this folio will be charged to the credit card on file with the hotel. While this folio reflects a \$0 balance, your credit card may not be charged until after your departure. You are ultimately responsible for paying all of your folio charges in full.

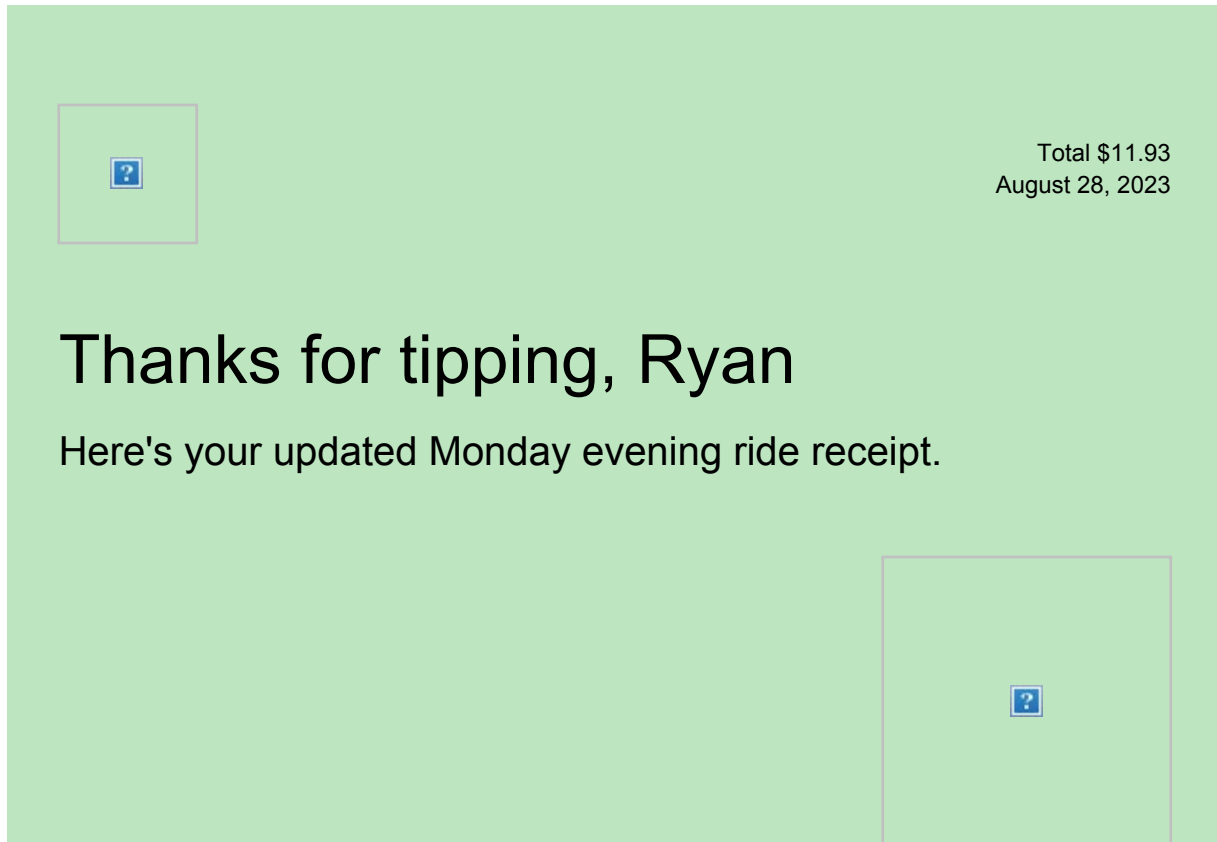
When you stay with us, we Go Beyond so you can too with thoughtful service, exceptional experiences and everything you seek when traveling. Book your next stay at [Sheraton.com](https://www.sheraton.com)
Tell us about your stay. www.sheraton.com/reviews

Bring the Sheraton sleep experience home with you. Visit [SheratonStore.com](https://www.sheratonstore.com).

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Monday evening trip with Uber
Date: Tuesday, August 29, 2023 7:22:03 AM

----- Forwarded message -----

From: **Uber Receipts** <noreply@uber.com>
Date: Mon, Aug 28, 2023, 9:00 PM
Subject: [Personal] Your Monday evening trip with Uber
To: [REDACTED]



Total	\$11.93
-------	---------

Trip fare	\$8.17
-----------	--------

Subtotal	\$8.17
----------	--------

Booking Fee ☐ \$1.76

Tips \$2.00

Payments



Work - Chase Sapphire ••••9429

\$11.93

8/28/23 8:59 PM

[Switch Payment Method](#)

[Download PDF](#)

You rode with Robert

4.99 ☐ Rating

☐ Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX

4.67 miles | 9 min



8:37 PM

1 N Second St, Harrisburg, PA 17101, US



8:47 PM

3991 Paxton St, Harrisburg, PA 17111, US

Ruby Tuesday #4710
3991 Paxton Street
Harrisburg, PA 17111

SALE

1749 Breann M

Tbl B7/1

Chk 3918

Aug 28 '23 09:33PM

SNG SMSH GBR CM : \$9.99

Subtotal: \$9.99

TAX: \$0.60

Total: \$10.59

Tip: \$2.41

\$13.00

Card Type: VISA

Account: *****9429

PAX Txn: 15

Batch: 532

Device: 4768..d97b

eThor Txn: 0000..9063

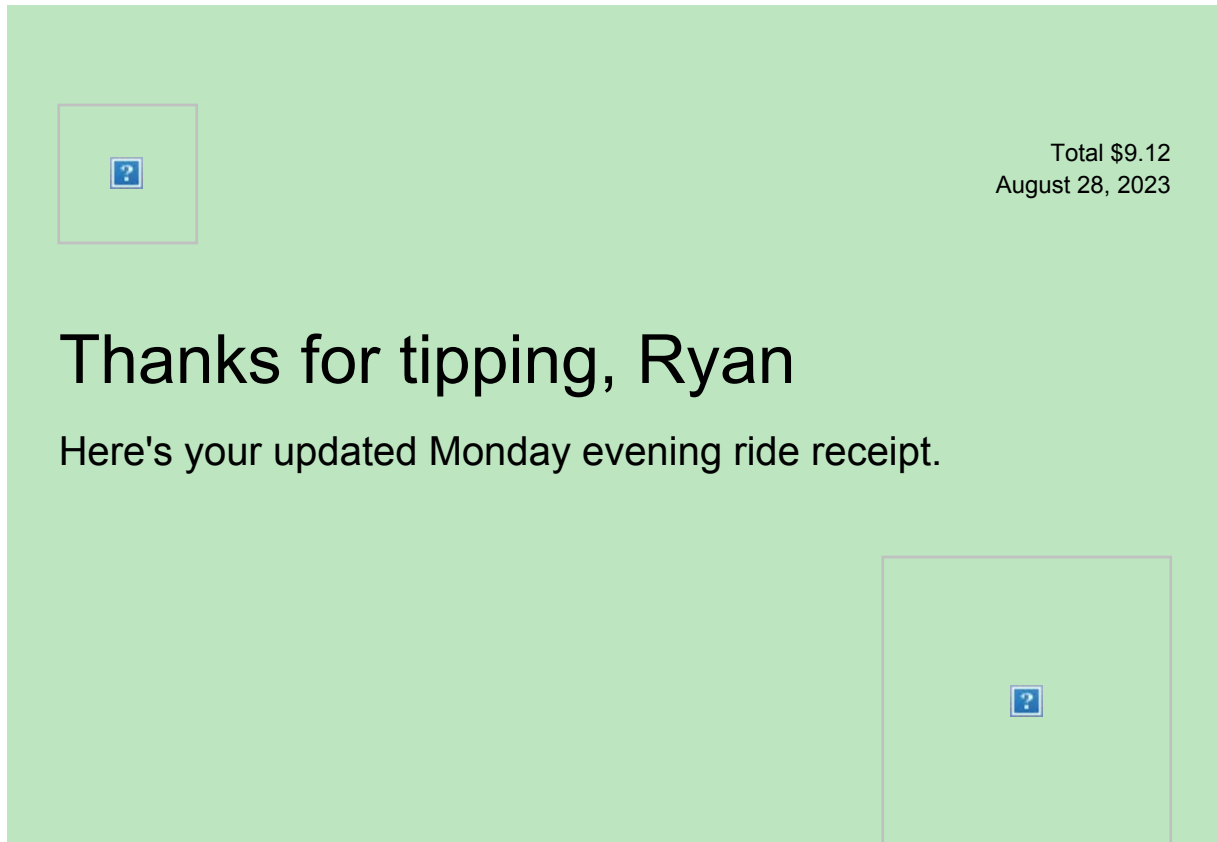
Txn Date: Aug 28 '23 09:33PM

Auth Code: 096241

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Monday evening trip with Uber
Date: Tuesday, August 29, 2023 7:17:23 AM

----- Forwarded message -----

From: **Uber Receipts** <noreply@uber.com>
Date: Mon, Aug 28, 2023, 9:52 PM
Subject: [Personal] Your Monday evening trip with Uber
To: [REDACTED]



Total	\$9.12
-------	--------

Trip fare	\$5.50
-----------	--------

Subtotal	\$5.50
----------	--------

Booking Fee ☐ \$1.62

Tips \$2.00

Payments



Work - Chase Sapphire ••••9429

\$9.12

8/28/23 9:52 PM

[Switch Payment Method](#)

[Download PDF](#)

You rode with DAVID

5.00 ☐ Rating

☐ Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX

1.63 miles | 4 min



9:36 PM

3991 Paxton St, Harrisburg, PA 17111, US




9:40 PM

4650 Lindle Rd, Harrisburg, PA 17111, US

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Tuesday evening trip with Uber
Date: Tuesday, August 29, 2023 10:04:52 PM

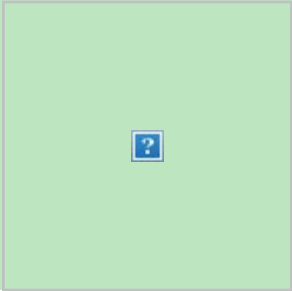
----- Forwarded message -----
From: **Uber Receipts** <noreply@uber.com>
Date: Tue, Aug 29, 2023, 8:03 PM
Subject: [Personal] Your Tuesday evening trip with Uber
To: [REDACTED]



Total \$13.41
August 29, 2023

Thanks for tipping, Ryan

Here's your updated Tuesday evening ride receipt.



Total \$13.41

Trip fare \$8.81

Subtotal \$8.81

Booking Fee	<input type="checkbox"/>	\$2.10
Tips		\$2.50

Payments



Work - Chase Sapphire ••••9429

8/29/23 8:03 PM

\$13.41

[Switch Payment Method](#)

[Download PDF](#)

You rode with Linda Dorene

4.96 ☐ Rating

☐ Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX 5.19 miles | 8 min



7:43 PM

4650 Lindle Rd, Harrisburg, PA 17111, US



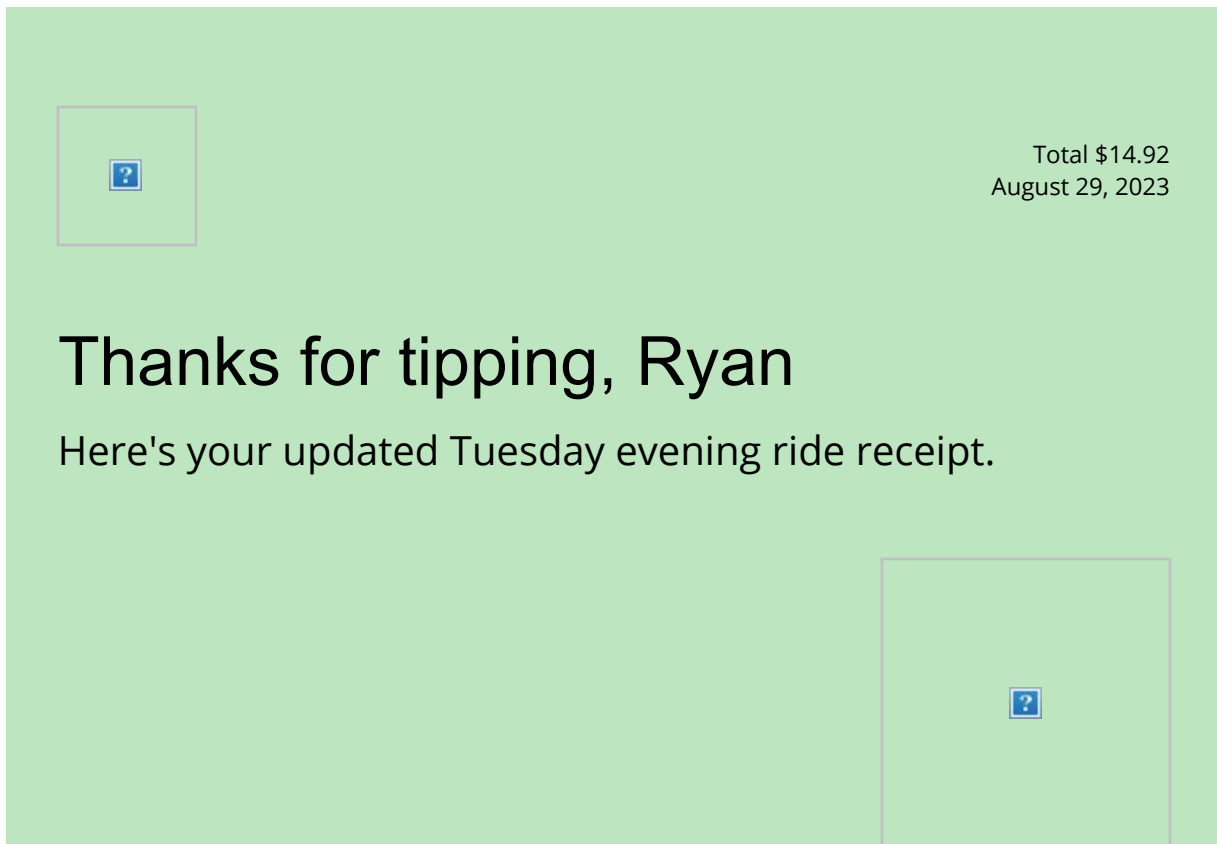
7:52 PM

1 N Second St, Harrisburg, PA 17101, US

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Tuesday evening trip with Uber
Date: Tuesday, August 29, 2023 10:13:48 PM

----- Forwarded message -----

From: **Uber Receipts** <noreply@uber.com>
Date: Tue, Aug 29, 2023, 10:12 PM
Subject: [Personal] Your Tuesday evening trip with Uber
To: [REDACTED]



Total	\$14.92
-------	---------

Trip fare	\$9.71
-----------	--------

Subtotal	\$9.71
----------	--------

Booking Fee <input type="checkbox"/>	\$2.21
Tips	\$3.00

Payments



Work - Chase Sapphire ••••9429

\$14.92

8/29/23 10:12 PM

[Switch Payment Method](#)

[Download PDF](#)

You rode with Jon

4.97 ☐ Rating

☐ Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX 5.61 miles | 10 min



9:50 PM

1 N Second St, Harrisburg, PA 17101, US



10:00 PM

4650 Lindle Rd, Harrisburg, PA 17111, US

Sheraton Harrisburg Hershey
4650 Lindle Road
Harrisburg, PA 17111
United States
Tel: 717-564-5511 Fax: 717-564-6173



RYAN MACIAS

Page Number : 1 Invoice Nbr : 1000122471
Guest Number : 1194916
Folio ID : A
Arrive Date : 08-28-2023 18:09
Depart Date : 08-30-2023
No. Of Guest : 1
Room Number : 448
Marriott Bonvoy Number : [REDACTED]

Information Invoice

Tax ID :

Sheraton Harri HARS! AUG-30-2023 01:30 9999

Date	Reference	Description	Charges (USD)	Credits (USD)
08-28-2023	RT448	Room Chrg - Govt./Military	117.00	
08-28-2023	RT448	State Tax	7.02	
08-28-2023	RT448	County Tax	5.85	
08-29-2023	RT448	Room Chrg - Govt./Military	117.00	
08-29-2023	RT448	State Tax	7.02	
08-29-2023	RT448	County Tax	5.85	
AUG-30-2023	VI	Visa		-259.74
** Total			259.74	-259.74
*** Balance			0.00	

Continued on the next page

Sheraton Harrisburg Hershey
4650 Lindle Road
Harrisburg, PA 17111
United States
Tel: 717-564-5511 Fax: 717-564-6173



RYAN MACIAS

Page Number	:	2	Invoice Nbr	:	1000122471
Guest Number	:	1194916			
Folio ID	:	A			
Arrive Date	:	08-28-2023	18:09		
Depart Date	:	08-30-2023			
No. Of Guest	:	1			
Room Number	:	448			
Marriott Bonvoy Number	:				

For your convenience, we have prepared this zero-balance folio indicating a \$0 balance on your account. Please be advised that any charges not reflected on this folio will be charged to the credit card on file with the hotel. While this folio reflects a \$0 balance, your credit card may not be charged until after your departure. You are ultimately responsible for paying all of your folio charges in full.

When you stay with us, we Go Beyond so you can too with thoughtful service, exceptional experiences and everything you seek when traveling. Book your next stay at [Sheraton.com](https://www.sheraton.com)
Tell us about your stay. www.sheraton.com/reviews

Bring the Sheraton sleep experience home with you. Visit SheratonStore.com.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: [Personal] Your Wednesday morning trip with Uber
Date: Wednesday, August 30, 2023 8:41:02 AM

----- Forwarded message -----

From: Uber Receipts <noreply@uber.com>
Date: Wed, Aug 30, 2023, 8:36 AM
Subject: [Personal] Your Wednesday morning trip with Uber
To: [REDACTED]



Total \$16.91
August 30, 2023

Thanks for tipping, Ryan

Here's your updated Wednesday morning ride receipt.



Total	\$16.91
-------	---------

Trip fare	\$11.52
-----------	---------

Subtotal	\$11.52
----------	---------

Booking Fee ☐ \$2.39

Tips \$3.00

Payments



Work - Chase Sapphire ••••9429

\$16.91

8/30/23 8:36 AM

[Switch Payment Method](#)

[Download PDF](#)

You rode with SOBHI

4.94 ☐ Rating

☐ Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

[Learn more](#)

UberX

6.20 miles | 15 min



8:10 AM

4650 Lindle Rd, Harrisburg, PA 17111, US



8:25 AM

601 Commonwealth Ave, Harrisburg, PA 17120, US

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Jarret on August 30
Date: Wednesday, August 30, 2023 9:50:04 PM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Wed, Aug 30, 2023, 9:19 PM
Subject: Your ride with Jarret on August 30
To: [REDACTED]

Lyft Pink



AUGUST 30, 2023 AT 9:02 PM

Thanks for riding with Jarret!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (5.16mi, 9m 58s)	\$11.99
Lyft Pink member-exclusive savings	-\$0.59
Tip	\$3.00



Visa *9429

\$14.40

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 30, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup** 9:02 PM
540 Race St, Harrisburg, PA
- ☐ **Drop-off** 9:12 PM
4650 Lindle Rd Harrisburg, PA

Tip driver


[PLAN TRAVEL](#) [TRAVEL INFORMATION](#) [AADVANTAGE®](#)


Your trip

Confirmation code: ZGLVLL**Trip name:** PHL/SBP**Issued:** August 30, 2023**Status:** Ticketed
[Change trip](#)

You can review before you confirm


[Change seats](#)

[Cancel trip](#)

Review before you cancel


[See cost summary](#)

DEPART

Philadelphia, PA to San Luis Obispo, CA

Friday, September 1, 2023

Flight	Depart	Arrive	Travel time	Class	Seats
478 American Airlines Airbus A321neo	10:50 AM PHL	12:57 PM PHX	5h 7m	Economy	27F
On time	Estimated 10:50 AM Terminal: -- Gate: --	Estimated 12:57 PM Terminal: 4 Gate: -- Baggage: --			
Stop: Phoenix (PHX)					
3088 American Airlines Operated by SkyWest Airlines as American Eagle Bombardier CRJ700	2:18 PM PHX	3:58 PM SBP	1h 40m	Economy	6B
On time	Estimated 2:18 PM Terminal: 4 Gate: B2	Estimated 3:58 PM Terminal: -- Gate: -- Baggage: --			



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[Scan to
download](#)


Move to First
Book for as low as

[Best way to travel](#)



Cost summary

Total cost (All passengers)

\$674.20

Passenger (1)

Base Fare	\$604.65
Taxes and Fees	\$69.55
Carrier-imposed fees	\$0.00

Total cost (All passengers) **\$674.20**

- [Bag and optional fees](#)
- [Reservation and tickets FAQs](#)
- [Price and Tax Information](#)

Close

Sheraton Harrisburg Hershey
 4650 Lindle Road
 Harrisburg, PA 17111
 United States
 Tel: 717-564-5511 Fax: 717-564-6173



RYAN MACIAS

Page Number : 1 Invoice Nbr : 1000122471
 Guest Number : 1194916
 Folio ID : A
 Arrive Date : 08-28-2023 18:09
 Depart Date : 08-31-2023 16:00
 No. Of Guest : 1
 Room Number : 448
 Marriott Bonvoy Number : [REDACTED]

Tax Invoice

Tax ID :

Sheraton Harri HARS1 AUG-31-2023 02:40 9999

Date	Reference	Description	Charges (USD)	Credits (USD)
08-28-2023	RT448	Room Chrg - Govt./Military	117.00	
08-28-2023	RT448	State Tax	7.02	
08-28-2023	RT448	County Tax	5.85	
08-29-2023	RT448	Room Chrg - Govt./Military	117.00	
08-29-2023	RT448	State Tax	7.02	
08-29-2023	RT448	County Tax	5.85	
08-30-2023	VI	Visa-9710		-259.74 ^[1]
08-30-2023	2228	Dog & Pony	8.00	
08-30-2023	RT448	Room Chrg - Govt./Military	117.00	
08-30-2023	RT448	State Tax	7.02	
08-30-2023	RT448	County Tax	5.85	
AUG-31-2023	VI	Visa		-137.87 ^[2]
** Total			397.61	-397.61
*** Balance			0.00	

[1] This is reflected in the Folio from August 30th. Traveler had to extend stay by a night, so hotel combined the nights and re-issued. Note that this shows that the Traveler paid for the first two nights at this time.

[2] Traveler only including the relevant portion of this expense (\$129.87) since the rest of the folio has already been claimed above and the \$8 charge is not reimbursable.

Continued on the next page

Sheraton Harrisburg Hershey
4650 Lindle Road
Harrisburg, PA 17111
United States
Tel: 717-564-5511 Fax: 717-564-6173



RYAN MACIAS

Page Number	:	2	Invoice Nbr	:	1000122471
Guest Number	:	1194916			
Folio ID	:	A			
Arrive Date	:	08-28-2023	18:09		
Depart Date	:	08-31-2023	16:00		
No. Of Guest	:	1			
Room Number	:	448			
Marriott Bonvoy Number	:	██████████			

For your convenience, we have prepared this zero-balance folio indicating a \$0 balance on your account. Please be advised that any charges not reflected on this folio will be charged to the credit card on file with the hotel. While this folio reflects a \$0 balance, your credit card may not be charged until after your departure. You are ultimately responsible for paying all of your folio charges in full.

When you stay with us, we Go Beyond so you can too with thoughtful service, exceptional experiences and everything you seek when traveling. Book your next stay at [Sheraton.com](https://www.sheraton.com)
Tell us about your stay. www.sheraton.com/reviews

Bring the Sheraton sleep experience home with you. Visit SheratonStore.com.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Steffon on August 31
Date: Thursday, August 31, 2023 8:45:43 AM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Thu, Aug 31, 2023, 8:41 AM
Subject: Your ride with Steffon on August 31
To: [REDACTED]

Lyft Pink



AUGUST 31, 2023 AT 8:13 AM

Thanks for riding with Steffon!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (5.87mi, 13m 30s)	\$13.99
Lyft Pink member-exclusive savings	-\$0.69
Tip	\$3.00



Visa *9429

\$16.30

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 31, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup 8:13 AM**
4650 Lindle Rd Harrisburg, PA
- ☐ **Drop-off 8:26 AM**
1 Finance Building, Harrisburg, PA

Tip driver

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with MICHELLE on August 31
Date: Thursday, August 31, 2023 5:37:52 PM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Thu, Aug 31, 2023, 5:37 PM
Subject: Your ride with MICHELLE on August 31
To: [REDACTED]

Lyft Pink



AUGUST 31, 2023 AT 4:51 PM

Thanks for riding with MICHELLE!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (10.86mi, 33m 1s)	\$23.78
Waypoint wait time fee - 41 sec	\$0.36
Priority Pickup Upgrade	\$2.87
Lyft Pink free Priority Pickup upgrade	-\$2.87
Tip	\$5.40



Visa *9429

\$29.54

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 31, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup 4:51 PM**
1 Finance Building, Harrisburg, PA
- ☐ **Stop 5:06 PM**
4650 Lindle Rd Harrisburg, PA
- ☐ **Drop-off 5:24 PM**
Grace St, Harrisburg, PA

Tip driver

From: etickets@amtrak.com
To: [Ryan Macias](#)
Subject: Amtrak: eTicket and Receipt for Your 08/31/2023 Trip - RYAN MACIAS - UPDATED
Date: Thursday, August 31, 2023 7:58:30 PM
Attachments: [Macias Ryan_202308311958220691.pdf](#)

SALES RECEIPT



Purchased: 08/19/2023 8:29 AM PT

Modified: 08/31/2023 2:15 PM PT

Thank you for your purchase.

1 Massachusetts Ave NW
Washington, DC 20001
800-USA-RAIL
Amtrak.com

1. Retain this receipt for your records.
2. Show the QR code on the attached eTicket to the conductor or use the Amtrak app.

Reservation Number - C954F5

Harrisburg, PA to Philadelphia, PA - William H Gray III 30th St. Sta. (One-Way)

AUGUST 19, 2023

Change Summary - Ticket Number 2431449570865

Original Amount Paid	\$35.00
TRAIN 656: Harrisburg, PA to Philadelphia, PA - William H Gray III 30th St. Sta. (One-Way)	
Depart 5:30 PM, Thursday, August 31, 2023	
1 UNRESERVED COACH SEAT	\$35.00
Ticket Terms & Conditions	
VLD ON DATE/TRAIN TKTD. COACH: REFUNDS/CHANGES PERMITTED, FEE MAY APPLY. BUSINESS: REFUNDS/CHANGES PERMITTED, NO FEE.	
Subtotal	\$35.00
Revised Fare	\$35.00
Total Charged	\$0.00

Passengers

Ryan Macias

Important Information

- Tickets are non-transferable.
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. If your travel plans change, contact us before departure to change your reservation. If you do not board your train,

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with TAREK on August 31
Date: Thursday, August 31, 2023 8:44:44 PM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Thu, Aug 31, 2023, 8:22 PM
Subject: Your ride with TAREK on August 31
To: [REDACTED]

Lyft Pink



AUGUST 31, 2023 AT 7:43 PM

Thanks for riding with TAREK!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (8.84mi, 18m 24s)	\$29.60
Lyft Pink member-exclusive savings	-\$1.49
Philadelphia City Fee	\$0.39
Tip	\$6.00



Visa *9429

\$34.50

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 31, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup** 7:43 PM
2951 Market St, Philadelphia, PA
- ☐ **Drop-off** 8:02 PM
1 Arrivals Rd Philadelphia, PA

Tip driver

& & & 401 & & &
PHILADELPHIA AIRPORT MARRIOTT
**** AVIATION GRILL ****

227526 Yoshua

3

CHK 1271 TBL 111/1
GST 1

31 Aug'23 8:21 PM

1 Philly Cheesesteak	21.00
1 Truffle Wedges	5.00
1 VICTORY HAZY IPA	8.50
1 DOG FISH	9.00
1 DOG FISH	9.00

Subtotal: \$52.50

Tax: \$4.73

Total: \$10.00

9:50 PM

TOTAL DUE: \$47.23

PLAT/TIA/AMB ELITE

FOOD/BEVE CRED \$10.00

PLEASE COMPLETE FOR ROOM CHARGES

GRATUITY 11.77

TOTAL 59

29.00 (dinner allowance cap)

ROOM NUMBER

PRINT LAST NAME

SIGNATURE



PHILADELPHIA AIRPORT MARRIOTT

GUEST FOLIO

1509 MACIAS/R 169.00 09/01/23 12:00
ROOM NAME RATE DEPART TIME
CKNG 08/31/23 20:03
TYPE ARRIVE TIME
93

ACCT#

ROOM ADDRESS PAYMENT MBV#

DATE	REFERENCES	CHARGES	CREDITS	BALANCES DUE
08/31	GRILL	12711509	59.00	
08/31	ROOM	1509, 1	169.00	
08/31	STATE OC	1509, 1	11.83	
08/31	CITY TAX	1509, 1	14.37	
08/31	PHIL LEV	1509, 1	1.27	
08/31	CITY TAX	1509, 1	.11	
08/31	STATE OC	1509, 1	.09	
09/01	VS CARD			\$255.67

TO BE SETTLED TO: VISA CURRENT BALANCE .00

IF WE TOOK GREAT CARE OF YOU, AND EXCEEDED YOUR EXPECTATIONS
AND YOU WOULD LIKE TO RECOGNIZE OUR HOTEL OR ONE OF OUR
HOSTS, PLEASE SHARE IT WITH US AT WWW.TRIPADVISOR.COM.

See our "Privacy & Cookie Statement" on Marriott.com

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PHILADELPHIA AIRPORT MARRIOTT
ARRIVALS ROAD
PHILADELPHIA PA 19153
(215) 492-9000

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This statement is your only receipt. You have agreed to pay in cash or by approved personal check or to authorize us to charge your credit card for all amounts charged to you. The amounts shown in the credit column opposite any credit card entry in the reference column above will be charged to the credit card number set forth above. (The credit card company will bill in the usual manner.) If for any reason the credit card company does not make payment on this account, you will owe us such amount. If you are direct billed, in the event payment is not made within 25 days after check-out, you will owe us interest from the check-out date on any unpaid amount at the rate of 1.5% per month (ANNUAL RATE 18%), or the maximum allowed by law, plus the reasonable cost of collection, including attorney fees.

Signature X

August 17, 2023

Paul Weachter

[REDACTED]

[REDACTED]

Hangley, Aronchick, Segal, Pudlin & Schiller

One Logan Square

Philadelphia, PA 19103

Service of subpoenas: Eldon Martin and Patricia Hess

Paid: \$175.


PROOF OF SERVICE

SERVED <i>Patricia Hess</i> <i>Subpoena</i>	DATE <i>8-17-2023</i> <i>3:35 p.m.</i>	PLACE <i>201 N. Second Street</i> <i>McCConnellsburg, PA 17233</i>
SERVED ON (PRINT NAME) <i>Patricia Hess</i>	MANNER OF SERVICE <i>Personal - hand delivered</i>	
SERVED BY (PRINT NAME) <i>Paul Weachter</i>	TITLE <i>Process Server</i>	
DECLARATION OF SERVER		

I verify that the statements made in this verification are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Date *August 17, 2023*

Paul Weachter
Signature of Server


Address of Server


PROOF OF SERVICE

SERVED Eldon Martin Subpoena	DATE 8-17-2023 2:00 p.m.	PLACE 201 N. Second Street McConnellsburg, PA, 17233
SERVED ON (PRINT NAME) Eldon Martin	MANNER OF SERVICE Personal - hand delivered	
SERVED BY (PRINT NAME) Paul Weachter	TITLE Process Server	
DECLARATION OF SERVER		

I verify that the statements made in this verification are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Date 8-17-2023

Paul Weachter
Signature of Server

[REDACTED]
Address of Server

**HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER
CHECK REQUEST FORM**

REQUESTED BY MJL.kem

DATE REQUESTED 08/09/2023

DATE NEEDED 08/09/2023
(IF MORE OR LESS THAN 30-45 DAYS)

If this is a request for reimbursement, section 1 and section 2 must be completed. Attach all receipts.

SECTION 1:

PAYABLE TO Commonwealth Court of Pennsylvania

AMOUNT \$10.00 CLIENT/MATTER NAME Commonwealth PA/Fulton

CLIENT/MATTER NUMBER 28000-050

DESCRIPTION OF EXPENSE Cost of 5 subpoenas (\$2.00 each)

SPECIAL INSTRUCTIONS Please see attached email from MJL requesting these per RAW & EGK

SECTION 2:

LOCATION/DESTINATION _____

PEOPLE IN ATTENDANCE _____

BUSINESS DISCUSSED/PURPOSE OF TRAVEL _____

DATE	TRAVEL FROM	TRAVEL TO	HOTEL	SEMINAR	MEALS	AIR/RAIL	AUTO / CAB	OTHER	TOTAL
08/09/2023								\$10.00	\$10.00
									\$0.00
									\$0.00
									\$0.00
TOTAL			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10.00	\$10.00

APPROVED BY

DATE



Invoice Number	Invoice Date	Account Number	Page
8-231-47169	Aug 21, 2023		5 of 8

Transmission of Subpoenas to Process Server

Ship Date: Aug 16, 2023		Cust. Ref.: 28000-050	Ref.#2:
Payor: Shipper		Ref.#3:	
Fuel Surcharge - FedEx has applied a fuel surcharge of 17.25% to this shipment.			
Distance Based Pricing, Zone 2			
Package Delivered to Recipient Address - Release Authorized			
Automation	INET	Sender	Recipient
Tracking ID	773074552497	Karen Michalczyk	Mr. Paul Weachter
Service Type	FedEx First Overnight	PHILADELPHIA PA 19103 US	
Package Type	FedEx Envelope		
Zone	02		
Packages	1		
Rated Weight	N/A		
Delivered	Aug 17, 2023 08:21	Transportation Charge	61.25
Svc Area	A2	Fuel Surcharge	11.57
Signed by	see above	Residential Delivery	5.80
FedEx Use	000000000/3/02	Total Charge	USD \$78.62



Invoice Number	Invoice Date	Account Number	Page
8-238-23379	Aug 28, 2023		3 of 6

Return of Original Proof of Service from Process Server to HASPS (M. Hunter)

Ship Date: Aug 21, 2023

Cust. Ref.: 28000-050

Ref.#2:

Payor: Shipper

Ref.#3:

The Earned Discount for this ship date has been calculated based on a revenue threshold of \$ 33440.79

Fuel Surcharge - FedEx has applied a fuel surcharge of 17.75% to this shipment.

Distance Based Pricing, Zone 2

Package sent from: 21740 zip code

Package Delivered to Recipient Address - Release Authorized

Automation	INET	Sender	Recipient
Tracking ID	773075039849	Karen Michalczyk	Maria Hunter
Service Type	FedEx Priority Overnight	PHILADELPHIA PA 19103 US	Hangley Aronchick et al.
Package Type	FedEx Envelope		PHILADELPHIA PA 19103 US
Zone	02		
Packages	1		
Rated Weight	N/A	Transportation Charge	30.25
Delivered	Aug 22, 2023 10:22	Earned Discount	-4.24
Svc Area	A1	Automation Bonus Discount	-1.51
Signed by	see above	Fuel Surcharge	4.35
FedEx Use	000000000/186/02	Total Charge	USD \$28.85

INVOICE

1 of 1

Sargent's Court Reporting Service
210 Main Street
Johnstown, PA 15901
Phone: 814-536-8908 Fax: 814-539-7579

Robert A. Wiygul, Esquire
Hangley, Aronchick, Segal & Pudlin - Philadelphia
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

Invoice No.	Invoice Date	Job No.
1745820	8/30/2023	262716
Job Date	Case No.	
8/28/2023	277 MD 2021 and 3 MAP 2022	
Case Name		
Fulton County vs. Secretary of the Commonwealth		
Payment Terms		

Certified Transcript
Commonwealth Court Hearing

1,309.35
TOTAL DUE >>> \$1,309.35

Rough

INVOICE

1 of 1

Sargent's Court Reporting Service
210 Main Street
Johnstown, PA 15901
Phone: 814-536-8908 Fax: 814-539-7579

Robert A. Wiygul, Esquire
Hangley, Aronchick, Segal & Pudlin - Philadelphia
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

Invoice No.	Invoice Date	Job No.
1746209	8/31/2023	262717
Job Date	Case No.	
8/30/2023	277 MD 2021 and 3 MAP 2022	
Case Name		
Fulton County vs. Secretary of the Commonwealth		
Payment Terms		

Certified Transcript
Hearing

1,832.95

TOTAL DUE >>>

\$1,832.95

Rough.

Tax ID: 25-1794603

Please detach bottom portion and return with payment.

Robert A. Wiygul, Esquire
Hangley, Aronchick, Segal & Pudlin - Philadelphia
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

Job No. : 262717 BU ID : HARR-CVIL
Case No. : 277 MD 2021 and 3 MAP 2022
Case Name : Fulton County vs. Secretary of the
Commonwealth
Invoice No. : 1746209 Invoice Date : 8/31/2023
Total Due : \$1,832.95

Remit To: **Erie Civil**

PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:

INVOICE

1 of 1

Sargent's Court Reporting Service
210 Main Street
Johnstown, PA 15901
Phone: 814-536-8908 Fax: 814-539-7579

Robert A. Wiygul, Esquire
Hangley, Aronchick, Segal & Pudlin - Philadelphia
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

Invoice No.	Invoice Date	Job No.
1746919	9/5/2023	262718
Job Date	Case No.	
8/31/2023	277 MD 2021 and 3 MAP 2022	
Case Name		
Fulton County vs. Secretary of the Commonwealth		
Payment Terms		

Certified Transcript
Hearing

1,063.85

TOTAL DUE >>>

\$1,063.85

ACCEPTING VISA, MASTERCARD AND AMERICAN EXPRESS

Tax ID: 25-1794603

Please detach bottom portion and return with payment.

Robert A. Wiygul, Esquire
Hangley, Aronchick, Segal & Pudlin - Philadelphia
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

Job No. : 262718 BU ID : HARR-CONTR
Case No. : 277 MD 2021 and 3 MAP 2022
Case Name : Fulton County vs. Secretary of the
Commonwealth
Invoice No. : 1746919 Invoice Date : 9/5/2023
Total Due : \$1,063.85

Remit To: **Sargent's Court Reporting, Inc. - Main**
210 Main Street
Johnstown, PA 15901

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

Wiygul, Robert A.

From: Rob Wiygul [REDACTED]
Sent: Saturday, September 2, 2023 8:15 PM
To: Wiygul, Robert A.
Subject: Fwd: Amtrak: eTicket and Receipt for Your 08/29/2023 Trip - ROBERT WIYGUL
Attachments: Wiygul Robert 202308270845470982.pdf

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

----- Forwarded message -----

From: <etickets@amtrak.com>
Date: Sun, Aug 27, 2023, 8:45 AM
Subject: Amtrak: eTicket and Receipt for Your 08/29/2023 Trip - ROBERT WIYGUL
To: [REDACTED]

SALES RECEIPT



Purchased: 08/27/2023 5:45 AM PT Thank you for your purchase.

1. Retain this receipt for your records.
2. Show the QR code on the attached eTicket to the conductor or use the Amtrak app.

Merchant ID 006081 Massachusetts Ave NW Washington, DC 20001 800-USA-RAIL Amtrak.com

Reservation Number - D0A2B8 Philadelphia, PA - William H Gray III 30th St. Sta. to Harrisburg, PA (Round-Trip) AUGUST 27, 2023

Billing Information

ROBERT WIYGUL [REDACTED]

Visa ending in 1754 (Purchase) Authorization Code 707254

Total \$102.00

Purchase Summary - Ticket Number 2390608507615

TRAIN 647: Philadelphia, PA - William H Gray III 30th St. Sta. to Harrisburg, PA (Round-Trip) Depart 3:45 PM, Tuesday, August 29, 2023

1 UNRESERVED COACH SEAT

\$51.00

Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. REFUNDS/CHANGES PERMITTED, NO FEE.

Subtotal

\$51.00

TRAIN 618: Harrisburg, PA to Philadelphia, PA - William H Gray III 30th St. Sta. (Round-Trip) Depart 6:46 PM, Thursday, August 31, 2023

1 UNRESERVED COACH SEAT

\$51.00

Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. REFUNDS/CHANGES PERMITTED, NO FEE.

28000-050

PAU

\$51.00
total

= \$102.00 (for round-trip
travel between Philadelphia
and Harrisburg on 8/29
and 8/31) - \$51.00 refund
(due to carpooling
w/ team on return
8/31 trip)

Subtotal
\$51.00
Total Charged by Amtrak
\$102.00
Passengers
Robert Wiygul
Important Information

- Tickets are non-transferable.
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. If your travel plans change, contact us before departure to change your reservation. If you do not board your train, your entire reservation from that point will be canceled. If you board a different train without notifying us, you will have to pay for it separately; the conductor cannot apply the money paid for your prior reservation. For more information please visit Amtrak.com/changes.
- Summary of Terms and Conditions: Ticket valid for carriage or refund (subject to the refund rules of the fare purchased) for twelve months after day of issue unless otherwise specified. Amtrak tickets may only be sold or issued by Amtrak or an authorized travel agent/tour operator. Tickets sold or issued by an unauthorized third party will be voided by Amtrak. This ticket is a contract of carriage which includes specific terms and conditions and a binding arbitration agreement between Amtrak and the ticket holder. The terms and conditions and arbitration agreement are available at Amtrak.com/terms-and-conditions.html. Tickets sold for non-Amtrak service are subject to the tariffs of the providing carrier.
- Questions? Contact us online at Amtrak.com/contact or call 1-800-USA-RAIL (1-800-872-7245) or for text telephone (TTY) 1-800-523-6590.

Wiygul, Robert A.

From: Rob Wiygul [REDACTED]
Sent: Saturday, September 2, 2023 8:16 PM
To: Wiygul, Robert A.
Subject: Fwd: Amtrak: Refund Receipt

[EXTERNAL EMAIL - This message originated outside Hanglely Aronchick.]

----- Forwarded message -----

From: <etickets@amtrak.com>
Date: Thu, Aug 31, 2023, 9:38 PM
Subject: Amtrak: Refund Receipt
To: [REDACTED]

REFUND RECEIPT



Purchased: 08/27/2023 5:45 AM PT Modified: 08/31/2023 3:34 PM PT Thank you for your business.

1 Massachusetts Ave NW Washington, DC 20001 800-USA-RAIL Amtrak.com

Reservation Number - D0A2B8

Billing Information

ROBERT WIYGUL [REDACTED]

Visa ending in 1754 (Credit)
\$51.00

Total Refunded to Credit Card

\$51.00

Change Summary

Original Amount Paid

\$102.00

Travel Amount Used

(\$51.00)

Subtotal

\$51.00

Reservation Canceled

Total Refunded to Credit Card

\$51.00

Passengers

Robert Wiygul

Important Information

- For complete details regarding Amtrak's Refund and Cancellation Policy, visit [Amtrak.com/refund](https://www.amtrak.com/refund).
- Questions? Contact us online at [Amtrak.com/contact](https://www.amtrak.com/contact) or call 1-800-USA-RAIL (1-800-872-7245) or for text telephone (TTY) 1-800-523-6590.
- **If your refund involves issuance of an Amtrak eVoucher:** eVouchers that are bought, sold, auctioned or transferred to or from a third party are prohibited and the value will be confiscated and voided and travel will not be permitted. By redeeming an eVoucher the Passenger named on the eVoucher acknowledges the content of these Amtrak eVoucher terms and conditions and agrees to abide by them.



PRESENT THIS DOCUMENT FOR BOARDING

RES# D38710-29AUG23

RESERVATION NUMBER D38710

PHL



HAR

Round-Trip

Philadelphia, PA
William H Gray III 30th St. Sta.

Harrisburg, PA

AUGUST 30, 2023

Depart

TRAIN

605

KEYSTONE SERVICE

Aug 30, 2023

DEPARTS

6:20 AM

Philadelphia, PA
William H Gray III 30th St. Sta.

ARRIVES

8:18 AM

Harrisburg, PA

1 Unreserved Coach Seat

Return

TRAIN

618

KEYSTONE SERVICE

Aug 30, 2023

DEPARTS

6:46 PM

Harrisburg, PA

ARRIVES

8:31 PM

Philadelphia, PA
William H Gray III 30th St. Sta.

1 Unreserved Coach Seat

PASSENGERS (1)

AMTRAK GUEST REWARDS

HILL, JOHN

ADULT

Proper identification is required for all passengers. This document is valid for only passengers listed. See www.amtrak.com/ID for details.

IMPORTANT INFORMATION

• VLD ON DATE/TRAIN TKTD. COACH: REFUNDS/CHANGES PERMITTED, FEE MAY APPLY.

• BUSINESS: REFUNDS/CHANGES PERMITTED, NO FEE.

- Free SEPTA Transfer: This ticket is valid for free travel on SEPTA Regional Rail trains between 30th Street, Suburban Station and Jefferson Station.
- eTickets for Unreserved Coach services are valid within the limits of the city-pair paid for and within one year of purchase, unless otherwise restricted by any special or promotional fare paid. Seats may not be available and you may have to stand.
- Coach accommodation on *Keystone Service* trains and the *Pennsylvanian*, between Philadelphia and Harrisburg, require reservations during the Thanksgiving and Christmas holiday periods each year.
- Passengers are encouraged to arrive at the station 30 minutes before departure or 60 minutes if in need of ticketing and/or baggage assistance, or if you're boarding at a Canadian station. Check the recommended arrival times for your departure station at Amtrak.com/at-the-station.

RES# D38710 PHL-HAR | Round-Trip Travel Date: Aug 30, 2023 Amtrak.com | 1-800-USA-RAIL

Visa ending in 8254 (Purchase) Authorization Code 04666I

Total \$70.00

Purchase Summary - Ticket Number 2410609598726

TRAIN 605: Philadelphia, PA - William H Gray III 30th St. Sta. to Harrisburg, PA (Round-Trip) Depart 6:20 AM, Wednesday, August 30, 2023

1 UNRESERVED COACH SEAT

\$35.00

Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. COACH: REFUNDS/CHANGES PERMITTED, FEE MAY APPLY. BUSINESS: REFUNDS/CHANGES PERMITTED, NO FEE.

Subtotal

\$35.00

TRAIN 618: Harrisburg, PA to Philadelphia, PA - William H Gray III 30th St. Sta. (Round-Trip) Depart 6:46 PM, Wednesday, August 30, 2023

1 UNRESERVED COACH SEAT

\$35.00

Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. COACH: REFUNDS/CHANGES PERMITTED, FEE MAY APPLY. BUSINESS: REFUNDS/CHANGES PERMITTED, NO FEE.

Subtotal

\$35.00

Total Charged by Amtrak

\$70.00

Passengers

John Hill

Important Information

- Tickets are non-transferable.
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. If your travel plans change, contact us before departure to change your reservation. If you do not board your train, your entire reservation from that point will be canceled. If you board a different train without notifying us, you will have to pay for it separately; the conductor cannot apply the money paid for your prior reservation. For more information please visit [Amtrak.com/changes](https://www.amtrak.com/changes).
- Summary of Terms and Conditions: Ticket valid for carriage or refund (subject to the refund rules of the fare purchased) for twelve months after day of issue unless otherwise specified. Amtrak tickets may only be sold or issued by Amtrak or an authorized travel agent/tour operator. Tickets sold or issued by an unauthorized third party will be voided by Amtrak. This ticket is a contract of carriage which includes specific terms and conditions and a binding arbitration agreement between Amtrak and the ticket holder. The terms and conditions and arbitration agreement are available at [Amtrak.com/terms-and-conditions](https://www.amtrak.com/terms-and-conditions).

From: etickets@amtrak.com
Sent: Tuesday, August 29, 2023 5:22 PM
To: Kagedan, Eitan G.
Subject: Amtrak: eTicket and Receipt for Your 08/29/2023 Trip - EITAN KAGEDAN
Attachments: Kagedan Eitan 202308291722170751.pdf

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

SALES RECEIPT



Purchased: 08/29/2023 2:22 PM PTThank you for your purchase.

1. Retain this receipt for your records.
2. Show the QR code on the attached eTicket to the conductor or use the Amtrak app.

1 Massachusetts Ave NWWashington, DC 20001800-USA-RAILAmtrak.com

Reservation Number - D33D19Philadelphia,
PA - William H Gray III 30th St. Sta. to Harrisburg, PA
(One-Way)AUGUST 29, 2023

Billing Information

Apple Pay (Purchase)	
Visa ending in 4063	
Total	\$35.00

Purchase Summary - Ticket Number 2410730685673

TRAIN 655: Philadelphia, PA - William H Gray III 30th St. Sta. to Harrisburg, PA (One-Way)	
Depart 8:15 PM, Tuesday, August 29, 2023	
1 UNRESERVED COACH SEAT	
	\$35.00
Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. COACH: REFUNDS/CHANGES PERMITTED, FEE MAY APPLY.BUSINESS: REFUNDS/CHANGES PERMITTED, NO FEE.	
Subtotal	
	\$35.00
Total Charged by Amtrak	
	\$35.00

Passengers

Eitan Kagedan

Important Information

- Tickets are non-transferable.
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. If your travel plans change, contact us before departure to change your reservation. If you do not board your train, your entire reservation from that point will be canceled. If you board a different train without notifying us, you will have to pay for it separately; the conductor cannot apply the money paid for your prior reservation. For more information please visit [Amtrak.com/changes](https://www.amtrak.com/changes).
- Summary of Terms and Conditions: Ticket valid for carriage or refund (subject to the refund rules of the fare purchased) for twelve months after day of issue unless otherwise specified. Amtrak tickets may only be sold or issued by Amtrak or an authorized travel agent/tour operator. Tickets sold or issued by an unauthorized third party will be voided by Amtrak. This ticket is a contract of carriage which includes specific terms and conditions and a binding arbitration agreement between Amtrak and the ticket holder. The terms and conditions and arbitration agreement are available at [Amtrak.com/terms-and-conditions.html](https://www.amtrak.com/terms-and-conditions.html). Tickets sold for non-Amtrak service are subject to the tariffs of the providing carrier.
- Questions? Contact us online at [Amtrak.com/contact](https://www.amtrak.com/contact) or call 1-800-USA-RAIL (1-800-872-7245) or for text telephone (TTY) 1-800-523-6590.

From: etickets@amtrak.com
Sent: Sunday, August 27, 2023 3:49 PM
To: Kagedan, Eitan G.
Subject: Amtrak: eTicket and Receipt for Your 08/28/2023 Trip - EITAN KAGEDAN
Attachments: Kagedan Eitan 202308271549070638.pdf
Follow Up Flag: Flag for follow up
Flag Status: Flagged

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

SALES RECEIPT



Purchased: 08/27/2023 12:49 PM PTThank you for your purchase.

1. Retain this receipt for your records.
2. Show the QR code on the attached eTicket to the conductor or use the Amtrak app.

Merchant ID 006771 Massachusetts Ave NWWashington, DC 20001800-USA-RAILAmtrak.com

Reservation Number - D100C3 Philadelphia, PA - William H Gray III 30th St. Sta. to Harrisburg, PA (Round-Trip) AUGUST 27, 2023

Billing Information

EITAN KAGEDAN1905 CHRISTIAN STREETPHILADELPHIA, PA 19146	
Visa ending in 4063 (Purchase)Authorization Code 07187D	
Total	\$86.00 \$35.00

Purchase Summary - Ticket Number 2390677552310

TRAIN 605: Philadelphia, PA - William H Gray III 30th St. Sta. to Harrisburg, PA (Round-Trip) Depart 6:20 AM, Monday, August 28, 2023 1 UNRESERVED COACH SEAT	
	\$35.00
Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. COACH: REFUNDS/CHANGES PERMITTED, FEE MAY APPLY. BUSINESS: REFUNDS/CHANGES PERMITTED, NO FEE.	
Subtotal	\$35.00

TRAIN 618: Harrisburg, PA to Philadelphia, PA - William H Gray	
III 30th St. Sta. (Round-Trip) Départ 6:46 PM, Monday, August 28, 2023	
1 UNRESERVED COACH SEAT	\$51.00
Ticket Terms & Conditions VLD ON DATE/TRAIN TKTD. REFUNDS/CHANGES PERMITTED, NO FEE.	
	Subtotal
	\$51.00
Total Charged by Amtrak	\$86.00 \$35.00

Passengers

Eitan Kagedan

Important Information

- Tickets are non-transferable.
- Changes to your itinerary may affect your fare. Refund and exchange restrictions and penalties for failure to cancel unwanted travel may apply. If your travel plans change, contact us before departure to change your reservation. If you do not board your train, your entire reservation from that point will be canceled. If you board a different train without notifying us, you will have to pay for it separately; the conductor cannot apply the money paid for your prior reservation. For more information please visit [Amtrak.com/changes](https://www.amtrak.com/changes).
- Summary of Terms and Conditions: Ticket valid for carriage or refund (subject to the refund rules of the fare purchased) for twelve months after day of issue unless otherwise specified. Amtrak tickets may only be sold or issued by Amtrak or an authorized travel agent/tour operator. Tickets sold or issued by an unauthorized third party will be voided by Amtrak. This ticket is a contract of carriage which includes specific terms and conditions and a binding arbitration agreement between Amtrak and the ticket holder. The terms and conditions and arbitration agreement are available at [Amtrak.com/terms-and-conditions.html](https://www.amtrak.com/terms-and-conditions.html). Tickets sold for non-Amtrak service are subject to the tariffs of the providing carrier.
- Questions? Contact us online at [Amtrak.com/contact](https://www.amtrak.com/contact) or call 1-800-USA-RAIL (1-800-872-7245) or for text telephone (TTY) 1-800-523-6590.

Barnes, Jacqueline D

From: Wiygul, Robert A.
Sent: Monday, September 4, 2023 4:00 PM
To: Barnes, Jacqueline D
Subject: RE: Travel reimbursement for 28000-050

From: Wiygul, Robert A.
Sent: Monday, September 4, 2023 3:40 PM
To: Barnes, Jacqueline D <jdb@hangley.com>
Subject: Travel reimbursement for 28000-050

Jackie,

I hope you've had a good holiday weekend. Would you please submit the following for reimbursement in 28000-050 to be processed as soon as possible this week?

\$137.55 = \$0.655/mile x 210 miles of round-trip travel in personal vehicle between Philadelphia and Harrisburg on 8/27 and 8/28 for Commonwealth Court hearing (see attached)

\$23.20 in tolls for same round-trip travel (see below)

Total = \$160.75

I am going to leave some additional receipts for meals, hotels, etc. on your desk.

Thanks very much,
Rob

From: [Michael J. Smith](#)
To: [John Smith](#)
Subject: [Re: Harrisburg to Fort Washington](#)
Date: [Monday, September 4, 2023 1:40 PM](#)

Hi John, would you please submit the following cash receipts for reimbursement on 9/28/2023?

\$1.00 - 100 hours parking fee

\$1.00 - 100 hours parking fee at hotel after checkout on 9/28

\$1.00 - 100 hours parking fee

\$1.00 - 100 hours parking fee at hotel after checkout on 9/28

Total: \$4.00

Thanks,
Mike

From: [Michael J. Smith](#)
Sent: Monday, September 4, 2023 1:40 PM
To: [John Smith](#); [John Smith](#)
Subject: [Re: Harrisburg to Fort Washington](#)

John,

I hope you've had a good holiday weekend. Would you please submit the following for reimbursement on 9/28/2023 to be processed as soon as possible that week?

\$12.80 - \$4.00 tolls on 200 miles of round-trip travel on personal vehicle between Philadelphia and Harrisburg on 9/27 and 9/28 for Commencement Court hearing (see attached)

\$12.80 in tolls for same round-trip travel (see below)

Total: \$25.60

I am going to have some additional receipts for meals, hotels, etc. on your desk.

Thanks very much,
Mike

Transactions per page:

10

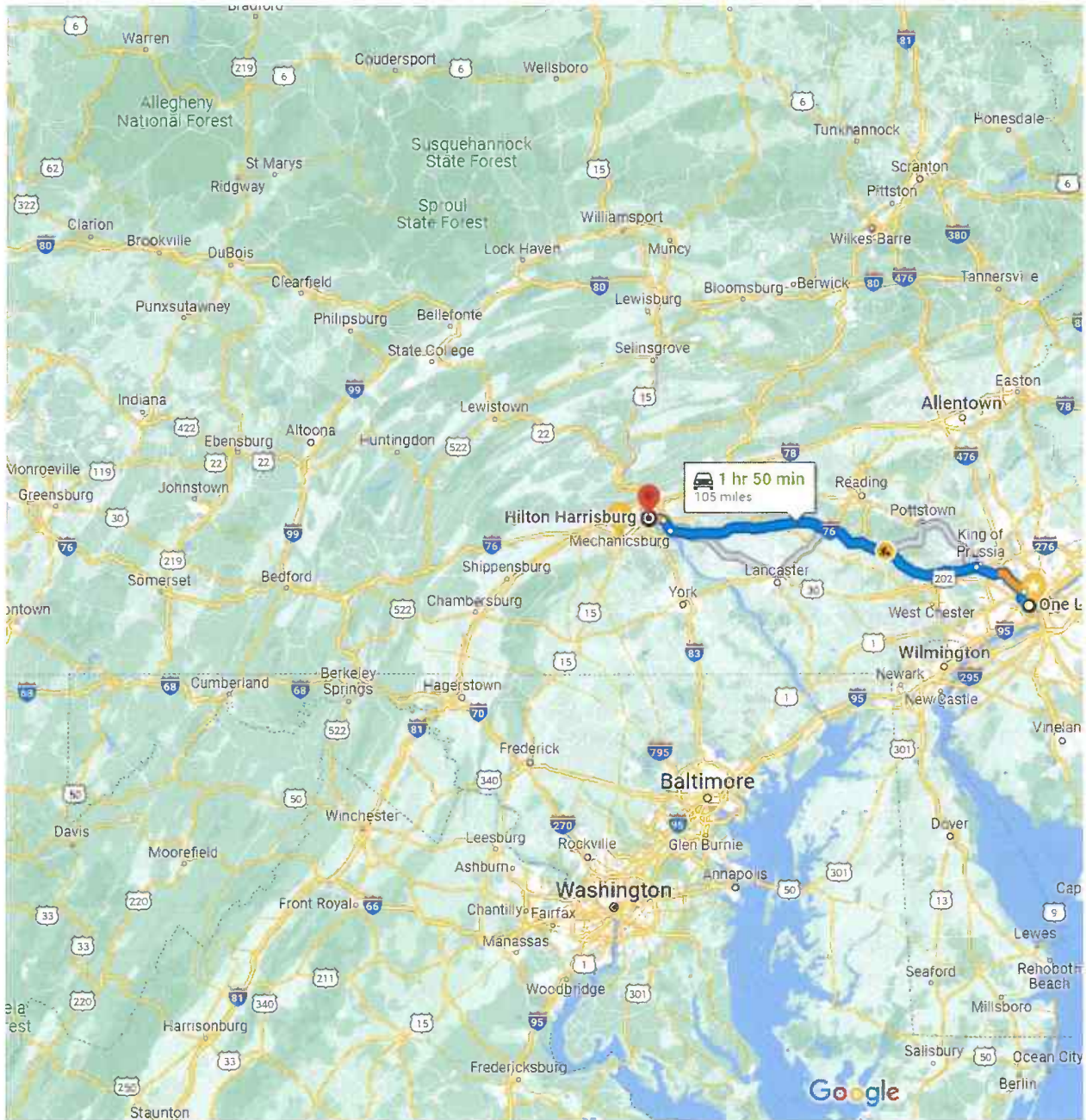
Search

Download

Post Date	Exit Date Time	Transaction	Tag	License	Entry	Exit	Class	Amount
3/30/2023	08/28/2023 22:24:25	E-ZPass Toll	02104807543		Harrisburg East Shore	Fort Washington	1	\$12.80
3/29/2023	08/27/2023 17:16:41	E-ZPass Toll	02104807543		Valley Forge	Harrisburg East Shore	1	\$10.40
Total Amount								\$23.20



One Logan Square, Philadelphia, PA 19103 to Hilton Harrisburg, One N 2nd St, Harrisburg, PA 17101 Drive 105 miles, 1 hr 50 min



Map data ©2023 Google 20 mi

One Logan Square
Philadelphia, PA 19103

⚠ This route has tolls.

Get on I-76 W from PA-3

<https://www.google.com/maps/dir/One+Logan+Square,+Philadelphia,+PA/Hilton+Harrisburg,+One+N+2nd+St,+Harrisburg,+PA+17101/@40.1019326,...> 1/3

9/4/23, 3:32 PM

One Logan Square, Philadelphia, PA to Hilton Harrisburg - Google Maps

- ↑ 1. Head south 5 min (1.0 mi)
- ↗ 2. Slight right toward Cherry St 141 ft
- 3. Turn right onto Cherry St 66 ft
- ↶ 4. Turn left onto N 19th St 397 ft
- 5. Turn right onto PA-3/John F Kennedy Blvd 0.1 mi
- ↗ 6. Slight right onto PA-3 0.5 mi
- ↗ 7. Merge onto I-76 W via the ramp to Vly Forge 164 ft
- ↗ 0.2 mi

Follow I-76 W to Harrisburg. Take exit 43 from I-83 S

- ↗ 8. Merge onto I-76 W 1 hr 36 min (104 mi)
- ↶ 9. Use the left 2 lanes to take the exit toward I-76 W 3.9 mi
- ⚠ Toll road
- ↶ 10. Use the left 2 lanes to stay on I-76 W toward Harrisburg 13.9 mi
- ⚠ Toll road
- ↶ 11. Use the right 2 lanes to take exit 247 toward I-283 N 79.0 mi
- ⚠ Toll road
- ↶ 12. Continue onto I-283 N 0.2 mi
- ⚠ Toll road
- ↶ 13. Use the left lane to take exit 3A toward I-83 S/Harrisburg 2.7 mi
- ↗ 14. Merge onto I-83 S 0.4 mi
- ↶ 15. Take exit 43 toward Capitol/2nd St 3.0 mi
- ↶ 16. Use the left lane to keep left at the fork and continue toward S 2nd St 0.4 mi
- 102 ft

Follow S 2nd St to Market St

2 min (0.5 mi)

<https://www.google.com/maps/dir/One+Logan+Square,+Philadelphia,+PA/Hilton+Harrisburg,+One+N+2nd+St,+Harrisburg,+PA+17101/@40.1019326,...> 2/3

9/4/23, 3:32 PM

One Logan Square, Philadelphia, PA to Hilton Harrisburg - Google Maps

↑ 17. Continue straight onto S 2nd St

0.5 mi

↪ 18. Turn right onto Market St

95 ft

Hilton Harrisburg

One N 2nd St, Harrisburg, PA 17101

9/4/23, 4:23 PM

Gmail - Your ride with Jani on August 29



Robert Wiygul <[REDACTED]>

Your ride with Jani on August 29

Lyft Receipts <no-reply@lyftmail.com>
To: [REDACTED]

Tue, Aug 29, 2023 at 5:44 PM



AUGUST 29, 2023 AT 3:17 PM

Thanks for riding with Jani!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (2.45mi, 17m 25s)
Philadelphia City Fee
Tip

\$13.47
\$0.19
\$2.00

 Visa *1754

*RAM trip to Phila.
train station for train
to Harrisburg for hearing*

\$15.66

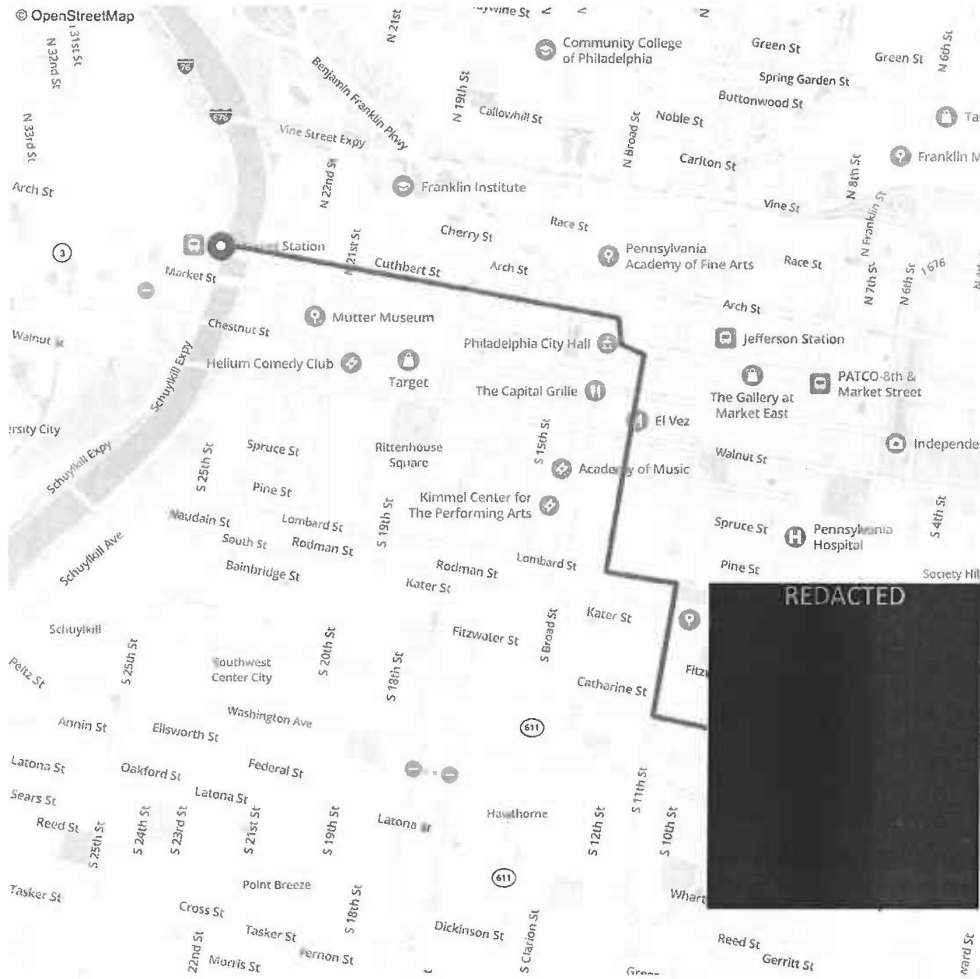
You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 29, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

<https://mail.google.com/mail/u/0/?ik=224ce75202&view=pt&search=all&permmsgid=msg-f:1775601439452037019&simpl=msg-f:1775601439452037019> 1/3

9/4/23, 4:23 PM

Gmail - Your ride with Jani on August 29



● **Pickup 3:17 PM**
[REDACTED] Philadelphia, PA

● **Drop-off 3:35 PM**
2955 Market St, Philadelphia, PA

Make expensing business rides easy

Enable business profile on Lyft to make expensing rides quick and easy.

GET BUSINESS PROFILE

<https://mail.google.com/mail/u/0/?ik=224ce75202&view=pt&search=all&permmsgid=msg-f:1775601439452037019&simpl=msg-f:1775601439452037019> 2/3

Wiygul, Robert A.

From: Wiygul, Robert A.
Sent: Monday, September 4, 2023 4:06 PM
To: Wiygul, Robert A.
Subject: FW: iParkit Reservation Confirmation (7BO5R-GAHL 08-26-2023 3:28PM)



iParkit Express Charge - MINT14865010671

Logan Square

- 1815 Cherry Street
- PHILADELPHIA PA , 19103
- (215) 496-1070

RAW

28000-050

Park Time

- Scanned In: 8/26/2023 3:28:41 PM
- Scanned Out: 8/26/2023 8:13:33 PM
- Price: \$13.60

*Weekend parking at office to
prepare for and pick up binders for
evidentiary hearing in Harrisburg*

Payment Information

- Card: xxxx-xxxx-xxxx-1754

Rate Your Experience



Please let us know how your parking experience was. Your feedback is important to us
Thank you,
The iParkit Team

Press Here To Rate

Having trouble viewing or printing this receipt? [Click here.](#)

Wiygul, Robert A.

From: Wiygul, Robert A.
Sent: Monday, September 4, 2023 4:06 PM
To: Wiygul, Robert A.
Subject: FW: iParkit Reservation Confirmation (7BO5R-GAHL 08-26-2023 3:28PM)



iParkit Express Charge - MINT14865010671

Logan Square

- 1815 Cherry Street
- PHILADELPHIA PA , 19103
- (215) 496-1070

RAW

28000-050

Park Time

- Scanned In: 8/26/2023 3:28:41 PM
- Scanned Out: 8/26/2023 8:13:33 PM
- Price: **\$13.60**

*weekend parking at office to
prepare for and pick up binders for
evidentiary hearing in Harrisburg*

Payment Information

- Card: xxxx-xxxx-xxxx-1754

Rate Your Experience



Please let us know how your parking experience was. Your feedback is important to us
Thank you,
The iParkit Team

Press Here To Rate

Having trouble viewing or printing this receipt? [Click here.](#)

Here's your receipt for your ride, Eitan

We hope you enjoyed your ride this evening.

Total \$10.89

Trip fare \$9.19

Subtotal \$9.19

Booking Fee \$1.55

Philadelphia TNC Assessment Fee \$0.15


Payments

 Visa ****4063 \$10.89
8/30/23 6:47 AM

[Visit the trip page](#) for more information, including invoices (where available)

You rode with Emanuel

UberX 1.91 miles | 8 min

7:51 PM | 
8:00 PM | 2955 Market St, Philadelphia, PA 19104, US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.



August 28, 2023

Here's your receipt for your ride, Eitan

We hope you enjoyed your ride this evening.

Total	\$9.99
<hr/>	
Trip fare	\$8.30
<hr/>	
Subtotal	\$8.30
Booking Fee	\$1.55
Philadelphia TNC Assessment Fee	\$0.14


Payments

 Visa ****4063	\$9.99
8/28/23 4:53 PM	

[Visit the trip page](#) for more information, including invoices (where available)

You rode with TAMIR

UberX 1.43 miles | 8 min

	5:58 AM 
	6:06 AM 2955 Market St, Philadelphia, PA 19104, US

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.



August 29, 2023

Here's your receipt for your ride, Eitan

We hope you enjoyed your ride this evening.

Total	\$7.12
-------	--------

Trip fare	\$5.50
-----------	--------

Subtotal	\$5.50
----------	--------

Booking Fee	\$1.62
-------------	--------

Payments

 Visa ****4063 8/30/23 9:01 AM	\$7.12
--	--------

[Visit the trip page](#) for more information, including invoices (where available)

You rode with SAMUEL

UberX 0.71 miles | 4 min



10:05 PM | 4th and Chestnut Sts, Harrisburg, PA 17101, US



10:09 PM | 1 N Second St, Harrisburg, PA 17101, US

Not satisfied with our service? Consumers can file a complaint through the PA Public Utility Commission's Bureau of Consumer Services 1 800 692 7380 or https://www.puc.state.pa.us/filing_resources/filing_complaints/informal_complaint_form.aspx. Or contact us directly at <https://help.uber.com>.

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.



Printed from Chase Personal Online

CREDIT CARD (...9301)

\$30.00

Sale

Aug 28, 2023

Transaction date

Aug 29, 2023

Posted date

WALNUT STREET
GARAGE

HARRISBURG, PA
000017101

(717) 554-2684

Description WALNUT STREET GARAGE
Also known as WALNUT STREET GARAGE
Merchant type Parking lots and garages
Method In person
Card number (...9301)
Category Travel
Reference number 55178423241207899700458

Rewards earned with this transaction

+ 1 mile per \$1 spent on all purchases 30

Total MileagePlus® Miles 30

Transaction details may be preliminary or incomplete and may not match the transaction as it appears on your periodic statement, which is the official record of your account activity.

Michalczyk, Karen E.

From: Hunter, Maria J.
Sent: Saturday, September 2, 2023 4:56 PM
To: Michalczyk, Karen E.
Cc: Hunter, Maria J.
Subject: MJL Reimbursements (28000-050)
Attachments: Travel - Home to Harrisburg Hilton .pdf; Travel - Harrisbug Hilton to Home.pdf; 2023-08-28 Parking in HBG.pdf; Travel - Harrisbug Hilton to Phila, then Home.pdf; Hilton Hotel.pdf; Tolls.pdf; Snacks.pdf

08/28

Travel: Home to Harrisburg Hilton --> 97.1 miles = \$63.60*
Toll --> \$10.40

Harrisburg Hilton to Home -- 97.3 miles = \$63.73*
Toll --> \$10.40

Parking: \$30.00

08/30

Travel: Home to Harrisburg Hilton --> 97.1 miles = \$63.60*
Toll --> \$10.40

08/31

Travel: Harrisburg Hilton to RAW Home, then EGK home, then MJL Home --> 118 miles = \$77.29*
Toll --> \$10.40

* Mileage Total: \$268.22

Google Maps

[REDACTED] to Hilton
Harrisburg, One N 2nd St, Harrisburg, PA 17101

Drive 97.1 miles, 1 hr 40 min

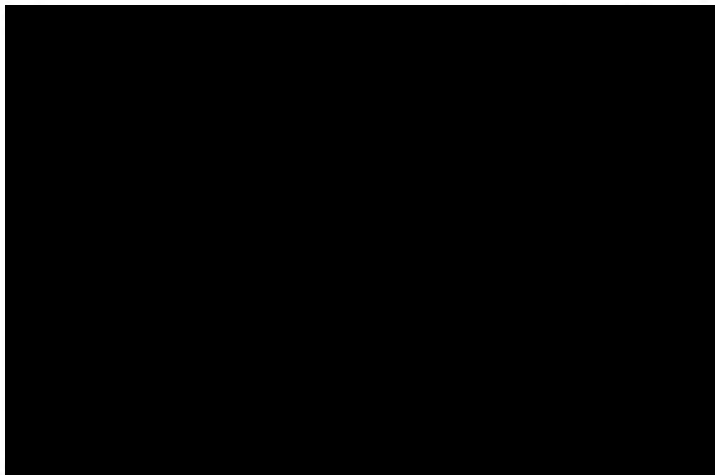


Map data ©2023 Google 10 mi

[REDACTED]
[REDACTED]

⚠ This route has tolls.

Get on I-76 W in King of Prussia from Montgomery Ave and
S Gulph Rd







↑ 7. Turn left onto the ramp to Valley Forge

0.2 mi

Continue on I-76 W to Harrisburg. Take exit 43 from I-83 S

1 hr 19 min (88.6 mi)

- 8. Merge onto I-76 W (signs for Interstate 76 W)
 Toll road
2.9 mi
- 9. Use the left 2 lanes to stay on I-76 W toward Harrisburg
 Toll road
79.0 mi
- 10. Use the right 2 lanes to take exit 247 toward I-283 N
 Toll road
0.2 mi
- 11. Continue onto I-283 N
 Toll road
0.3 mi
- 12. Keep left to stay on I-283 N
2.4 mi
- 13. Use the left lane to take exit 3A toward I-83 S/Harrisburg
0.4 mi
- 14. Merge onto I-83 S
3.0 mi
- 15. Take exit 43 toward Capitol/2nd St
0.4 mi
- 16. Use the left lane to keep left at the fork and continue toward S 2nd St
102 ft

Follow S 2nd St to Market St

- 17. Continue straight onto S 2nd St
2 min (0.5 mi)
0.5 mi
- 18. Turn right onto Market St
95 ft

Hilton Harrisburg

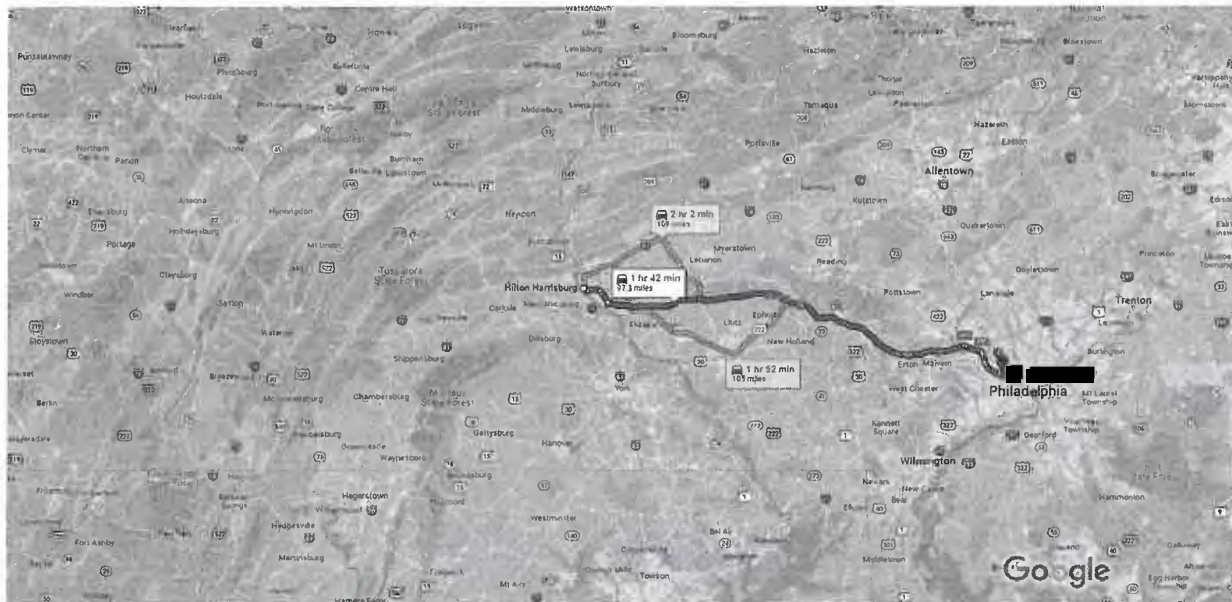
One N 2nd St, Harrisburg, PA 17101



Google Maps

Hilton Harrisburg, One N 2nd St, Harrisburg, PA 17101 to [REDACTED]

Drive 97.3 miles, 1 hr 42 min



Map data ©2023 Google 10 mi

Hilton Harrisburg

One N 2nd St, Harrisburg, PA 17101

⚠ This route has tolls.

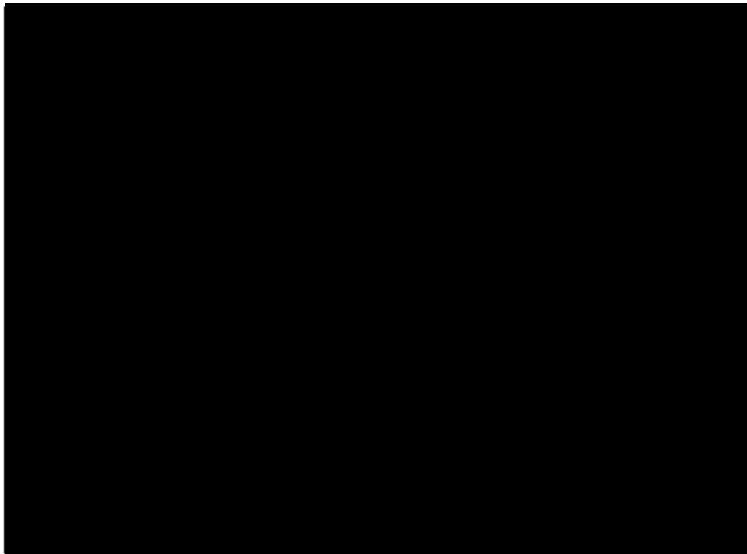
Get on I-83 N

- ↑ 1. Head northeast on Market St toward S Court St
_____ 5 min (1.3 mi)
_____ 407 ft
- ↪ 2. Turn right at the 2nd cross street onto S 3rd St
_____ 0.1 mi
- ↪ 3. Turn right at the 2nd cross street onto Chestnut St
ⓘ Pass by Crowne Plaza Harrisburg-Hershey (on the right)
_____ 0.2 mi
- ↩ 4. Turn left onto S Front St
_____ 0.3 mi
- ⬆ 5. Use the left 2 lanes to merge onto I-83 N via the ramp to Airport/Hershey
_____ 0.7 mi

Take I-76 to PA-320 S in Upper Merion Township. Take exit 330 from I-76

- ⬆ 6. Merge onto I-83 N
_____ 1 hr 20 min (89.1 mi)
_____ 2.8 mi

- 7. Take exit 46A to merge onto I-283 S toward I-76/Hbg Int'l Airport/Lancaster/Pennsylvania Tpke
3.0 mi
- ↩ 8. Keep left to stay on I-283 S
⚠ Toll road
0.2 mi
- ↩ 9. Take the I-76 E exit on the left toward Philadelphia
⚠ Toll road
0.6 mi
- ⤴ 10. Merge onto I-76
⚠ Toll road
78.1 mi
- ↑ 11. Continue onto I-276 E
⚠ Toll road
0.1 mi
- 12. Take exit 326 toward I-76
0.5 mi
- ↑ 13. Continue onto I-76
⚠ Toll road
3.5 mi
- 14. Take exit 330 to merge onto PA-320 S
0.3 mi



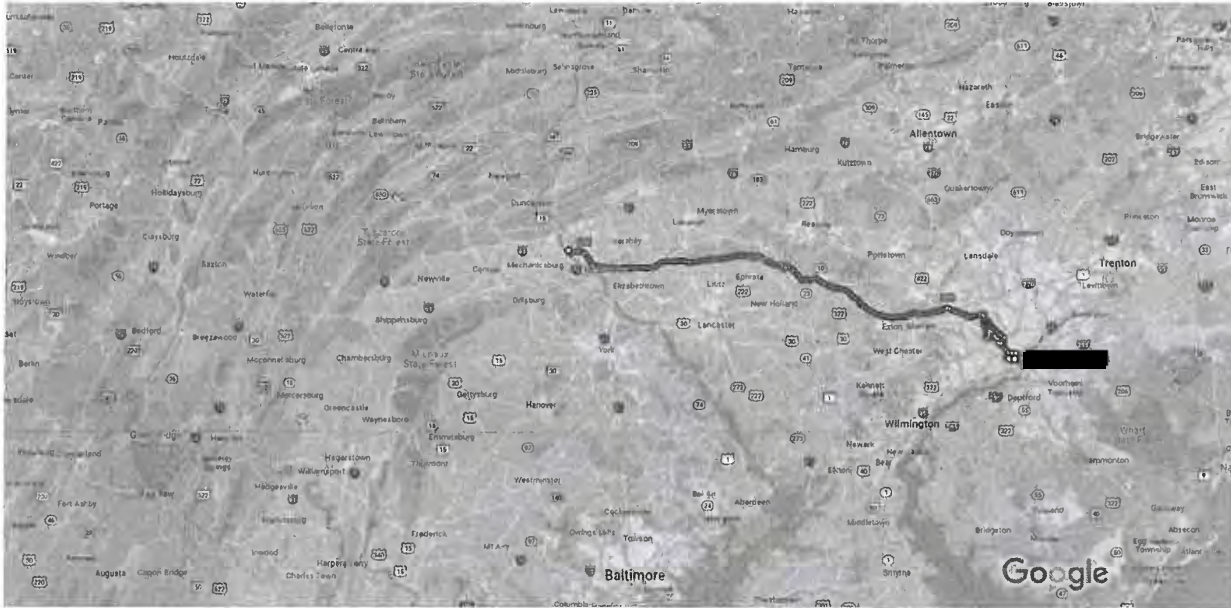
[REDACTED]
[REDACTED]

Google Maps

Hilton Harrisburg, One N 2nd St, Harrisburg, PA 17101 to [REDACTED]

Drive 118 miles, 2 hr 24 min

Drop off RAW and EGK in Phila



Map data ©2023 Google 10 mi



via I-76

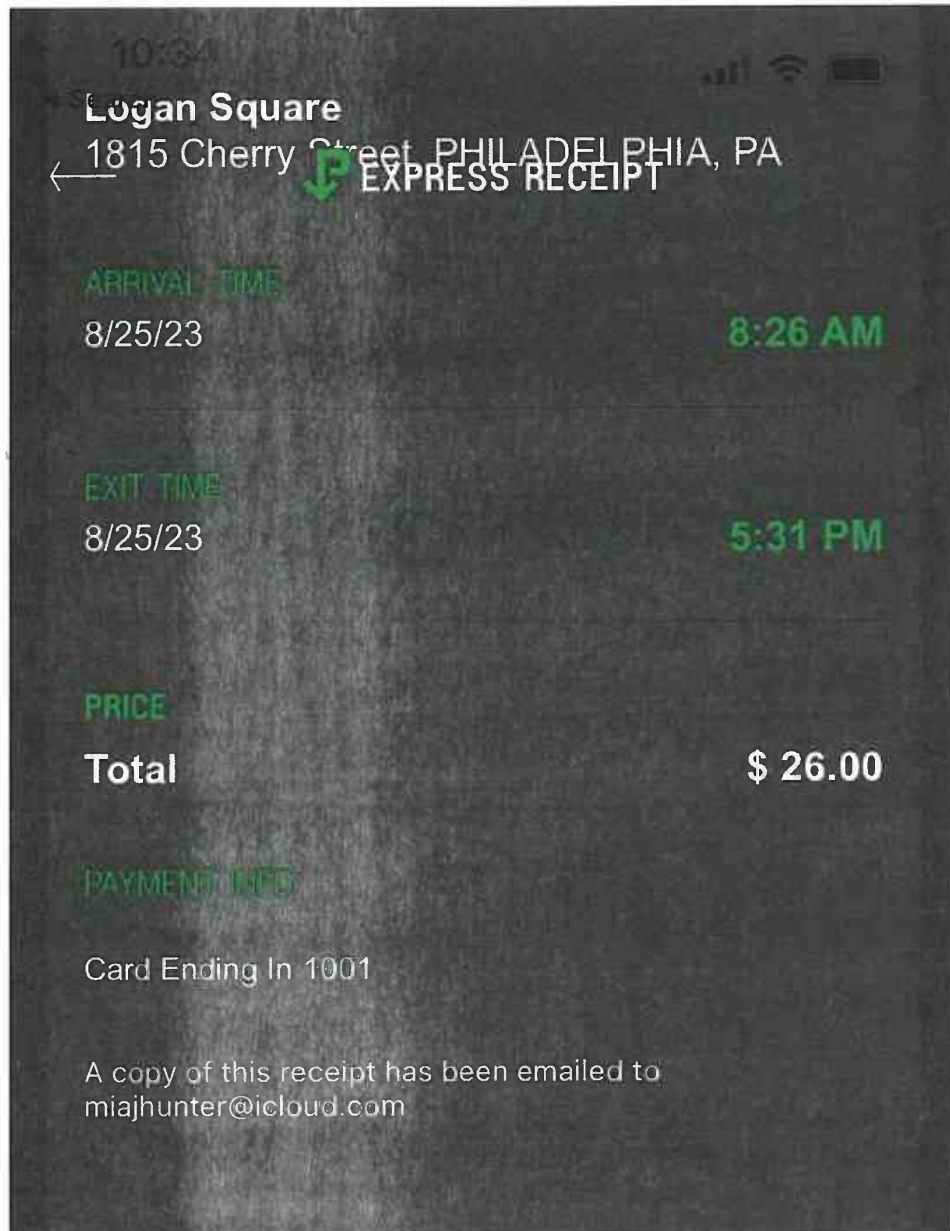
2 hr 24 min

2 hr 24 min without traffic

118 miles

▲ This route has tolls.

Restaurants Hotels Gas stations Parking Lots More





August 26, 2023

Here's your receipt for your ride, Maria

We hope you enjoyed your ride this evening.

Total \$21.98

Fare \$18.82

Subtotal \$18.82

Booking Fee \$2.86

Philadelphia TNC Assessment Fee \$0.30

Payments

Visa Visa ****6027 \$21.98

Visit the trip page for more information, including invoices (where available)

You rode with Michael

UberX 7.93 mi, 11 min

8:54 PM | 1 Locust St, Philadelphia, PA 19103, US

9:14 PM | [REDACTED]

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.



August 28, 2023

Here's your receipt for your ride, Maria

We hope you enjoyed your ride this evening.

Total	\$7.67
-------	--------

Trip fare	\$6.05
-----------	--------

Subtotal	\$6.05
----------	--------

Booking Fee	\$1.62
-------------	--------

Payments

 Visa ****6027	\$7.67
8/28/23 7:10 PM	

[Visit the trip page](#) for more information, including invoices (where available)

You rode with YVETTE

UberX 0.02 miles | 6 min

8:15 AM | 2 S 2nd St, Harrisburg, PA 17101, US

8:22 AM | 601 Commonwealth Ave, Harrisburg, PA 17120, US

Not satisfied with our service? Consumers can file a complaint through the PA Public Utility Commission's Bureau of Consumer Services 1 800 692 7389 or https://www.puc.state.pa.us/filing_resources/filing_complaints/informal_complaint_form.aspx. Or contact us directly at <https://help.uber.com>.

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

From: Lyft Receipts no-reply@lyftmail.com
Subject: Your ride with RYAN on August 29
Date: August 29, 2023 at 11:16:42 PM
To: Maria Hunter [REDACTED]



AUGUST 29, 2023 AT 7:28 PM

Thanks for riding with RYAN!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (7.86mi, 19m 27s)	\$17.74
Philadelphia City Fee	\$0.25



American Express *1001

\$17.99

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on August 29, 2023. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.



Pennsylvania Turnpike Commission
E-ZPass Customer Service Center
300 East Park Drive
Harrisburg, PA 17111

Transactions For:
MARIA HUNTER

Account Number: [REDACTED]

Search Filter:

Date Range: 8/27/2023 - 9/1/2023.

10.40
X 4
\$41.60
TOLLS

Post Date	Transaction	Tag	License / State	Entry Date	Entry Interchange	Exit Date	Exit Interchange	Class	Amount	Payment Method	Payment Account Number	Adjusted
08/31/2023	TOLL CHARGE	10621907		08/31/2023 05:38 PM	Harrisburg East - 247	08/31/2023 06:38 PM	Valley Forge - 326	1	\$10.40			
08/31/2023	TOLL CHARGE	10621907		08/30/2023 05:58 AM	Valley Forge - 326	08/30/2023 07:04 AM	Harrisburg East - 247	1	\$10.40			
08/30/2023	CC REPLENISHMENT	10621907						0	(\$35.00)	Visa	****6027	
08/29/2023	TOLL CHARGE	10621907		08/28/2023 07:52 PM	Harrisburg East - 247	08/28/2023 08:57 PM	Valley Forge - 326	1	\$10.40			
08/29/2023	TOLL CHARGE	10621907		08/28/2023 05:52 AM	Valley Forge - 326	08/28/2023 06:56 AM	Harrisburg East - 247	1	\$10.40			
								0	(\$6.60)	Total Amount		



HILTON HARRISBURG
ONE NORTH SECOND STREET
HARRISBURG, PA 17101
United States of America
TELEPHONE 717-233-6000 • FAX (717) 237-6271
Reservations
www.hilton.com or 1 800 HILTONS

Wiygul, Robert



UNITED STATES OF AMERICA

Room No: 610/K1
Arrival Date: 8/27/2023 5:38:00 PM
Departure Date: 8/28/2023 8:07:00 AM
Adult/Child: 1/0
Cashier ID: VFRANCO5
Room Rate: 209.00
AL:
HH #
VAT #
Folio No/Che 1584251 A

Confirmation Number: 3405863026

HILTON HARRISBURG 8/28/2023 8:07:00 AM

DATE	REF NO	DESCRIPTION	CHARGES
8/27/2023	7408816	*AD LIB CRAFT KITCHEN & BAR	\$81.90 58
8/27/2023	7409056	*OVERNIGHT SELF PARKING	\$15.00 10
8/27/2023	7409057	GUEST ROOM	\$209.00
8/27/2023	7409057	HOTEL OCCUPANCY ROOM TAX	\$12.54
8/27/2023	7409057	ROOM LOCAL TAX	\$10.45
8/28/2023	7409224	*AD LIB CRAFT KITCHEN & BAR	\$21.49 14
8/28/2023	7409228	VS *1754	(\$350.38)
BALANCE			\$0.00

EXPENSE REPORT SUMMARY

	8/27/2023	8/28/2023	STAY TOTAL
ROOM AND TAX	\$231.99	\$0.00	\$231.99
FOOD AND BEVERAGE	\$81.90	\$21.49	\$103.39 72
MISCELLANEOUS	\$15.00	\$0.00	\$15.00 10
DAILY TOTAL	\$328.89	\$21.49	\$350.38

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CREDIT CARD DETAIL

APPR CODE	708260	MERCHANT ID	000426759
CARD NUMBER	VS *1754	EXP DATE	03/25
TRANSACTION ID	7409228	TRANS TYPE	Sale



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HARRISBURG, PA 17101
United States of America
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www.hilton.com or 1 800 HILTONS

Wiygul, Robert

Room No: 919/K1DRQ
Arrival Date: 8/29/2023 5:53:00 PM
Departure Date: 8/31/2023 8:09:00 AM
Adult/Child: 1/0
Cashier ID: TYQUAN
Room Rate: 231.69
AL:
HH #
VAT #
Folio No/Che 1589117 A

Confirmation Number: 3417716548

HILTON HARRISBURG 8/31/2023 8:09:00 AM

DATE	REF NO	DESCRIPTION	CHARGES
8/29/2023	7411601	GUEST ROOM	\$231.69
8/29/2023	7411601	HOTEL OCCUPANCY ROOM TAX	\$13.90
8/29/2023	7411601	ROOM LOCAL TAX	\$11.58
8/30/2023	7413001	GUEST ROOM	\$231.69
8/30/2023	7413001	HOTEL OCCUPANCY ROOM TAX	\$13.90
8/30/2023	7413001	ROOM LOCAL TAX	\$11.58
8/31/2023	7413089	VS *1754	(\$514.34)
BALANCE			\$0.00

EXPENSE REPORT SUMMARY

	8/29/2023	8/30/2023	STAY TOTAL
ROOM AND TAX	\$257.17	\$257.17	\$514.34
DAILY TOTAL	\$257.17	\$257.17	\$514.34

PAW
28000-050

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CREDIT CARD DETAIL

APPR CODE	619235	MERCHANT ID	000426759
CARD NUMBER	VS *1754	EXP DATE	03/25
TRANSACTION ID	7413089	TRANS TYPE	Sale



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HARRISBURG, PA 17101
United States of America
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KAGEDAN, EITAN

Room No: 1330/RRMRU1
Arrival Date: 8/29/2023 10:14:00 PM
Departure Date: 8/31/2023 8:07:00 AM
Adult/Child: 1/0
Cashier ID: PGALLMANN
Room Rate: 213.08
AL:
HH #
VAT #
Folio No/Che 1589291 A

Confirmation Number: 3422146571

HILTON HARRISBURG 8/31/2023 8:06:00 AM

DATE	REF NO	DESCRIPTION	CHARGES
8/29/2023	7411441	GUEST ROOM	\$213.08
8/29/2023	7411441	HOTEL OCCUPANCY ROOM TAX	\$12.78
8/29/2023	7411441	ROOM LOCAL TAX	\$10.65
8/30/2023	7411657	*AD LIB CRAFT KITCHEN & BAR	\$24.14
8/30/2023	7412828	GUEST ROOM	\$213.08
8/30/2023	7412828	HOTEL OCCUPANCY ROOM TAX	\$12.78
8/30/2023	7412828	ROOM LOCAL TAX	\$10.65
8/31/2023	7413077	*AD LIB CRAFT KITCHEN & BAR	\$24.14
8/31/2023	7413085	VS *4063	(\$521.30) \$473.02
BALANCE			\$0.00

EXPENSE REPORT SUMMARY

	8/29/2023	8/30/2023	8/31/2023	STAY TOTAL
ROOM AND TAX	\$236.51	\$236.51	\$0.00	\$473.02
FOOD AND BEVERAGE	\$0.00	\$24.14	\$24.14	\$48.28
DAILY TOTAL	\$236.51	\$260.65	\$24.14	\$521.30 \$473.02

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CREDIT CARD DETAIL

APPR CODE	00272D	MERCHANT ID	000426759
CARD NUMBER	VS *4063	EXP DATE	01/28
TRANSACTION ID	7413085	TRANS TYPE	Sale



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HARRISBURG, PA 17101
United States of America
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Reservations
www.hilton.com or 1 800 HILTONS

HUNTER, MARIA

Room No: 925/D2
Arrival Date: 8/30/2023 9:25:00 AM
Departure Date: 8/31/2023 11:30:00 AM
Adult/Child: 1/0
Cashier ID: PGALLMANN
Room Rate: 213.08
AL:
HH #
VAT #
Folio No/Che 1589524 A

Confirmation Number: 3413487730

HILTON HARRISBURG 8/31/2023 11:29:00 AM

DATE	REF NO	DESCRIPTION	CHARGES
8/30/2023	7413003	*OVERNIGHT SELF PARKING	\$15.00 \$10.00
8/30/2023	7413004	GUEST ROOM	\$213.08
8/30/2023	7413004	HOTEL OCCUPANCY ROOM TAX	\$12.78
8/30/2023	7413004	ROOM LOCAL TAX	\$10.65
8/31/2023	7413092	AX *1001	(\$251.51)
8/31/2023	7413123	*AD LIB CRAFT KITCHEN & BAR	\$8.42
8/31/2023	7413158	AX *1001	(\$8.42)
BALANCE			\$0.00

EXPENSE REPORT SUMMARY

	8/30/2023	8/31/2023	STAY TOTAL
ROOM AND TAX	\$236.51	\$0.00	\$236.51
FOOD AND BEVERAGE	\$0.00	\$8.42	\$8.42
MISCELLANEOUS	\$15.00	\$0.00	\$15.00
DAILY TOTAL	\$251.51	\$8.42	\$259.93 5246.51

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CREDIT CARD DETAIL

APPR CODE	143267	MERCHANT ID	000426759
CARD NUMBER	AX *1001	EXP DATE	06/24
TRANSACTION ID	7413092	TRANS TYPE	Sale

**HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER
CHECK REQUEST FORM**

REQUESTED BY MJL.kem

DATE REQUESTED 08/16/2023

DATE NEEDED 08/16/2023
(IF MORE OR LESS THAN 30-45 DAYS)

If this is a request for reimbursement, section 1 and section 2 must be completed. Attach all receipts.

SECTION 1:

PAYABLE TO Eldon Martin

AMOUNT \$14.88 CLIENT/MATTER NAME Commonwealth
PA/Fulton

CLIENT/MATTER NUMBER 28000-050

DESCRIPTION OF EXPENSE Witness check to appear (cover cost/miles)

SPECIAL INSTRUCTIONS (\$5.00 fee (plus) \$9.88 - (70.6 miles x 2 x \$0.07) = \$14.88)

--- --- --- --- --- --- --- --- --- --- --- --- --- ---

SECTION 2:

LOCATION/DESTINATION _____

PEOPLE IN ATTENDANCE _____

BUSINESS DISCUSSED/PURPOSE OF TRAVEL _____

DATE	TRAVEL FROM	TRAVEL TO	HOTEL	SEMINAR	MEALS	AIR/RAIL	AUTO / CAB	OTHER	TOTAL
08/16/2023								\$14.88	\$14.88
									\$0.00
									\$0.00
									\$0.00
TOTAL			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$14.88	\$14.88

APPROVED BY

DATE

VENDOR #: 6717 **236078**

[illegible] **Safeguard** LITHO USA SFSL4 CK7S08114L

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER

ATTORNEYS AT LAW
ONE LOGAN SQUARE
PHILADELPHIA, PA 19103

PAY FOURTEEN AND 88/100 Dollars

TO THE ORDER OF Eldon Martin

PNC Bank N.A.
R/T 031000053

236078

3-5/310

CHECK DATE

08/16/23

CHECK AMOUNT

\$ 14.88

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE - RED IMAGE DISAPPEARS WITH HEAT.

11 236078 11 1203100005312

**HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER
CHECK REQUEST FORM**

REQUESTED BY MJL.kem

DATE REQUESTED 08/16/2023

DATE NEEDED 08/16/2023
(IF MORE OR LESS THAN 30-45 DAYS)

If this is a request for reimbursement, section 1 and section 2 must be completed. Attach all receipts.

SECTION 1:

PAYABLE TO Patricia Hess

AMOUNT \$16.16 CLIENT/MATTER NAME Commonwealth
PA/Fulton

CLIENT/MATTER NUMBER 28000-050

DESCRIPTION OF EXPENSE Witness check to appear (cover cost/miles)

SPECIAL INSTRUCTIONS (\$5.00 fee (plus) \$11.16 - (79.7 miles x 2 x \$0.07) = \$16.16)

--- --- --- --- --- --- --- --- --- --- --- --- --- ---

SECTION 2:

LOCATION/DESTINATION _____

PEOPLE IN ATTENDANCE _____

BUSINESS DISCUSSED/PURPOSE OF TRAVEL _____

DATE	TRAVEL FROM	TRAVEL TO	HOTEL	SEMINAR	MEALS	AIR/RAIL	AUTO / CAB	OTHER	TOTAL
08/16/2023								\$16.16	\$16.16
									\$0.00
									\$0.00
									\$0.00
TOTAL			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$16.16	\$16.16

APPROVED BY

DATE

VENDOR: Patricia Hess

236079

 Safeguard® LITHO USA SFSL4 CK7S08114L

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

ATTORNEYS AT LAW
ONE LOGAN SQUARE
PHILADELPHIA, PA 19103

TO THE ORDER OF Patricia Hess

3-5/310

08/16/23

\$ 16.16

100% Satisfaction Guarantee
 100% Satisfaction Guarantee



THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE - RED IMAGE DISAPPEARS WITH HEAT

№ 236079 № 10310000531

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 8/28/2023 Time: 7:42:09 AM
Check: 652090 Table: 305
Covers: 1 Person#: 1
Server #: 178 Opened: 7:31:00 AM

Coffee 3.00
Two Eggs Am Style 13.50
Beverage 16.50
SUB-TOTAL 33.00
Total Tax 0.99
TOTAL 33.99

Thank you for visiting!

THANK YOU!

April

RAW breakfast
see h.xl receipt
** (breakfast cap)*
*\$14.00 **

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 8/27/2023 Time: 7:31:24 PM
Check: 652050 Table: 310
Covers: 2 Person#: 1,2
Server #: 94 Opened: 6:37:00 PM

1 Wedge Salad 10.00
1 Cauliflower 8.00
1 Pellegrino 7.00
1 Shepherd's Pie 18.00
1 Jambalaya 22.00
FOOD TOTAL 65.00
BEVERAGE TOTAL 0.00
SUB-TOTAL 65.00
Total Tax 3.90
TOTAL 68.90

THANK YOU!
Heckmann

Thank you for visiting!

RAW dinner
+ R. Macias

\$13.00
*\$58.00 **
28000-050
see hotel receipt

** \$29 dinner cap*
X 2
\$58.00

Thank You!
Old Town Deli
717-856-8432

#173084 08/28/2023 12:15:24PM
01 CLERK01 000000

COPY

2@ 9.25 \$18.50
Rst. Beef Chd.
3@ 1.25 \$3.75
Soda can
3@ 2.19 \$6.57
Lg Chip
2@ 9.50 \$19.00
Chix caes wrap
1@ 2.25 \$2.25
Gold peak
1@ 2.00 \$2.00
Brownie
1@ 10.25 \$10.25
Cali wrap
HOUSE ST \$62.32
TAX1 \$3.74

ITEMS 130
CHARGE

\$66.06

RAW 28000-050
lunch w/ JBH, ECK,
MJL, and R. Macias

HARRISBURG HILTON AND TOWERS
Ad Lib Dining

Date: 8/28/2023 Time: 8:25:40 PM
Check: 652207 Table: 306
Covers: 3 Person#: 1,2,3
Server #: 177 Opened: 7:40:00 PM

1 Fish Taco 15.00
1 Ad Lib Burger 16.00
1 SD Salad 4.00
~~1 P. Evergreen 3.50~~
FOOD TOTAL 35.00
BEVERAGE TOTAL 4.50
SUB-TOTAL 44.50
Total Tax 2.10
TOTAL 46.60

THANK YOU! + \$10.00 tip
Sierra

Thank you for visiting!

RAW, Etkin and
R. Macias
dinner
28000-050
not on hotel receipt



Cork & Fork
200 State St
Harrisburg, PA 17101

Scan to Pay.

VISA DISCOVER AMERICAN EXPRESS



NOW ACCEPTING

G Pay

Server: Christian C
Check #60
Guest Count: 2
Ordered: 8/29/23 8:12 PM

1 (LG) Pappardelle \$25.00
1 Pistachio \$17.00
Add Chicken \$7.00
1 Btl San Pellegrino \$6.00
1 Avocado Salad \$14.00
1 Hot Tea \$3.00

Subtotal \$72.00
Tax \$4.32
Total \$76.32

Powered by Toast tip 15.00

\$91.32

\$58.00*

* 29 dinner cap
x 2
\$58



Los Tres Cubanos
540 Race St
Harrisburg, PA 17104

Server: Lena P
Check #32
Guest Count: 4
Ordered: 8/30/23 7:39 PM

1 Empanadas Chicken Sauce \$10.00
1 Yuca Frita Green Sauce \$10.00
1 Caipirinha \$11.00
~~3 Traditional Cuban Mojito \$33.00~~
~~1 Garnaacha + Vivanco La Maldita Glass \$11.00~~
1 Ropa Vieja \$21.00
White Rice and Black Beans
1 Ropa Vieja \$21.00
Moros Y Cristianos
1 Maduros - Sweet Plantains \$3.50
2 Masitas De Puerco \$48.00
Moros Y Cristianos
1 Flan \$9.00
Vanilla
1 Coconut Cheesecake \$9.00
2 Bon Bon \$8.00

Subtotal \$194.50
Tax \$8.37
Total \$202.87

Powered by Toast tip 38.90

246.77

116.00**

** 29 dinner cap
x 4
\$116

Thank You!
Old Town Deli
717-856-8432

#173272 08/30/2023 1:17:31PM
01 CLERK01 000000

COPY

2@ 9.50 \$19.00
Misc
1@ 9.50 \$9.50
Italian Sub
3@ 2.19 \$6.57
Lg Chip
3@ 1.25 \$3.75
Soda can
1@ 8.50 \$8.50
Chix salad
1@ 9.25 \$9.25
Classic Sandwich
1@ 1.25 \$1.25
Dear Park
MOSE ST \$57.82
TAXI \$3.47

ITEMS 120
CHARGE

\$61.29

RAW 28000-050
Lunch for RAW,
EGK, JBH, MJL
and R Macias

Wiygul, Robert A.

From: Rob Wiygul [REDACTED]
Sent: Saturday, September 2, 2023 8:25 PM
To: Wiygul, Robert A.
Subject: Fwd: Receipt from Denim Coffee

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

----- Forwarded message -----

From: **Denim Coffee** <messenger@messaging.squareup.com>
Date: Wed, Aug 30, 2023, 8:06 AM
Subject: Receipt from Denim Coffee
To: [REDACTED]

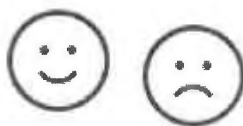
Square automatically sends receipts to the email address you used at any Square seller. [Learn more](#)

Denim
COFFEE

29000-050

RAW

break fast on
8/30



Let Denim Coffee know how your
experience was

\$ 11.19

Baked Goods	\$3.75
Muffin	
Cappuccino	\$3.50
Double	

Whole Milk	\$0.00
Bottle Water	\$1.50
Purchase Subtotal	\$8.75
PA Sales Tax (6%)	\$0.44
Tip	\$2.00
Total	\$11.19



This purchase earned 16 Points. Claim your Points to earn rewards.

+16

Get your Points

Denim Coffee

717-884-8814



Visa 5623 (Contactless)

VISA

VISA CARDHOLDER

Aug 30

2023

at 8:06

AM

#fTmm

Auth

code:

110865

AID: A0000000980840

No CVM



Receipt Settings

[Not your receipt?](#)

[Turn off automatic receipts](#)

[Manage preferences](#)

© 2023 Square [Privacy Policy](#)

1955 Broadway, Suite 600

Wiygul, Robert A.

From: Rob Wiygul [REDACTED]
Sent: Saturday, September 2, 2023 8:27 PM
To: Wiygul, Robert A.
Subject: Fwd: Receipt from Denim Coffee

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

----- Forwarded message -----

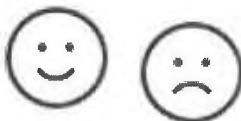
From: Denim Coffee <messenger@messaging.squareup.com>
Date: Thu, Aug 31, 2023, 8:15 AM
Subject: Receipt from Denim Coffee
To: [REDACTED]

Square automatically sends receipts to the email address you used at any Square seller. [Learn more](#)

Denim
COFFEE

RAW

break fast
on 8/31



———— 28000-050

Let Denim Coffee know how your
experience was

\$ 11.19

Baked Goods	\$3.75
Muffin	
Cappuccino	\$3.50
Double	

Whole Milk	\$0.00
Bottle Water	\$1.50
Purchase Subtotal	\$8.75
PA Sales Tax (6%)	\$0.44
Tip	\$2.00
Total	\$11.19



This purchase earned 16 Points. Claim your Points to earn rewards.

+16

Get your Points

Denim Coffee

717-884-8814



Visa 5623 (Contactless)

VISA

VISA CARDHOLDER

Aug 31

2023

at 8:15

AM

#Bu1v

Auth

code:

191258

AID: A0000000980840

No CVM



Receipt Settings

[Not your receipt?](#)

[Turn off automatic receipts](#)

[Manage preferences](#)

© 2023 Square [Privacy Policy](#)

1955 Broadway, Suite 600

Kagedan, Eitan G.

From: Denim Coffee <messenger@messaging.squareup.com>
Sent: Thursday, August 31, 2023 8:14 AM
To: Kagedan, Eitan G.
Subject: Receipt from Denim Coffee

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]

Square automatically sends receipts to the email address you used at any Square seller. [Learn more](#)



Let Denim Coffee know how your experience was

\$6.30

Summer Feature	\$5.00
----------------	--------

Purchase Subtotal	\$5.00
-------------------	--------

PA Sales Tax (6%)	\$0.30
-------------------	--------

Tip	\$1.00
-----	--------

Total	\$6.30
--------------	---------------

Kagedan, Eitan G.

From: Denim Coffee <messenger@messaging.squareup.com>
Sent: Wednesday, August 30, 2023 8:14 AM
To: Kagedan, Eitan G.
Subject: Receipt from Denim Coffee

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]



Let Denim Coffee know how your
experience was

\$5.77

Cold Brew	\$4.50
Half-Half	\$0.00
<hr/>	
Purchase Subtotal	\$4.50
PA Sales Tax (6%)	\$0.27
Tip	\$1.00
<hr/>	
Total	\$5.77

Snacks for count

GIANT

60 E. WYNNEWOOD ROAD
WYNNEWOOD, PA 19096
Store Telephone: (610) 642-6206
Pharmacy Telephone: (610) 602-8015
Store #6506 08/27/23 02:13pm

GROCERY

LSAVER WINTOGRN	3.09 B
SNKRS FS 10.59Z	5.69 F
BONUS BUY SAVINGS	0.70-F
PRICE YOU PAY	4.99
NAB CA ORGNL12CT	7.99 F
CP CD LS FAT	7.39 F
BONUS BUY SAVINGS	0.40-F
PRICE YOU PAY	6.99

TAX	0.18
**** BALANCE	23.24

Payment Type: US DEBIT
MV CONTACTLESS Purchase PIN Verified
Card *****2579
Payment Amt: \$23.24
Cashback Amt: \$0.00
BALANCE \$

ID A0000000980840
011095239 RC100 08/27/23 02:14pm

Card # 00179388

12345 6789
Expiry

23.24

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2023_September
DATE: October 1, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QT Y	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
3.5	Hours	Consulting hours worked on Pennsylvania Election Reviews - responding to the Special Master's order appointing the escrow agent	\$250	\$875.00
9.5	Hours	Travel hours for Pennsylvania Election Reviews - Application to Appoint Escrow Agent (time traveling from Harrisburg for Evidentiary Hearing)	\$175	\$1,662.50

Total \$2,537.50

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2023_October
DATE: November 1, 2023

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QT Y	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
1	Hours	Consulting hours worked on Pennsylvania Election Reviews - response to the Special Master's order appointing the escrow agent & final order appointing escrow agent	\$250	\$250.00

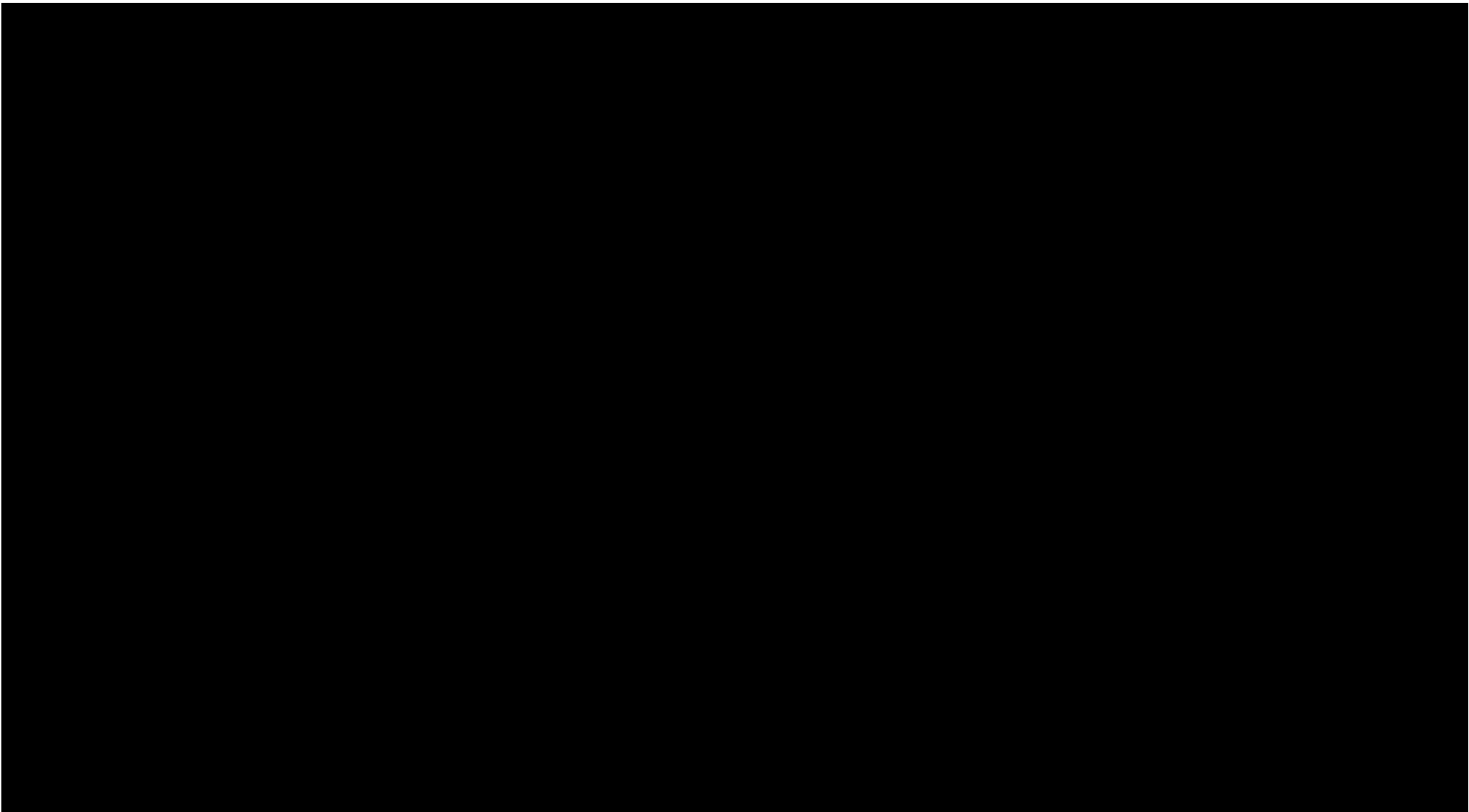
Total \$250.00

Account: HANGLEY ARONCHICK SEGAL & PUDLIN, PHILADELPHIA PA
Date Range: December 01, 2023 - December 31, 2023
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw
Content Families: All Content Families

Account by Client by User by Day

Account [REDACTED]
Client 28000-050
User Name HUNTER,MARIA J (4847574)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
User Name WYNGUL,ROBERT A (9372048)
Day 12/08/2023

[illegible]



Account: HANGLEY ARONCHICK SEGAL & PUDDLIN, PHILADELPHIA PA (1000546111)
Date Range: January 01, 2024 - January 31, 2024
Report Format: Summary-Account by Client by User by Day (Targeted)
Products: Westlaw
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Tax Amount	Total Charge
Account: [REDACTED]								
Client: 28020-050								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
User Name: WYUGUL, ROBERT A (9372048)								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
Day: 01/06/2024		26			1,290.00 USD	258.00 USD	20.64 USD	278.64 USD
Totals for included		26			1,290.00 USD	258.00 USD	20.64 USD	278.64 USD
Totals for Day: 01/06/2024		26			1,290.00 USD	258.00 USD	20.64 USD	278.64 USD
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								
[REDACTED]								

INVOICE

To: Robert A. Wiygul
raw@hangley.com

Remit to: Electronic Funds Transfer (EFT) to
Wells Fargo Account on File

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square, 27th Floor
Philadelphia, PA 19103

Agreement HASPS/RSM: Pennsylvania Election
Reviews

RSM Election Solutions LLC



INVOICE #: 2024_January
DATE: February 1, 2024

Remit to: Electronic Funds
Transfer (EFT) to Wells Fargo
Account on File

THANK YOU FOR
YOUR BUSINESS!

QTY	ITEM #	DESCRIPTION	UNIT PRICE	TOTAL
2.75	Hours	Consulting hours worked on Pennsylvania Election Reviews - Affidavit for Supplemental Application for Fees	\$250	\$687.50
4	Hours	Consulting hours worked on Pennsylvania Election Reviews - Fulton County Equipment Impoundment	\$250	\$1,000.00
16	Hours	Travel hours for Pennsylvania Election Reviews - Fulton County Equipment Impoundment (time traveling to/from McConnellsburg, Pennsylvania)	\$175	\$2,800.00
1	Each	Reimbursable Travel Cost (See Attached)	N/A	\$1,493.01

There was a classified briefing Thursday afternoon that traveler would have to miss if traveler was traveling for the Fulton County equipment impoundment, so the traveler flew in a day early and stayed on own in order to go to the briefing in DC.

Traveler also had a last-minute trip to Las Vegas, but had already purchased the flight from DFW-DCA, so the original ticket and price is included for reimbursement (i.e., this flight was not taken, but was less expensive than the actual flight from LAS so traveler is only seeking reimbursement for original flight).

Traveler had a family event on Saturday, so traveler flew directly to California (SBP) instead of home base (DFW). Traveler is seeking reimbursement for the full cost of the flight to California. Traveler is also not seeking reimbursement for ground transportation from the airport since family is picking traveler up upon arrival.

Traveler stayed in DC, where traveler flew in/out of. Traveler commuted Friday morning to Fulton and back. Hotel is in Arlington, Virginia, because of this and traveler had a same day car rental for the same reason.

Traveler does not own a car and therefore, does not have car insurance. Cost of the rental includes full coverage on the car and liability.

A breakdown of the costs is below, and all receipts are on the following pages:

Fulton Hangle		
Reimbursement	\$1,493.01	
Flight	\$753.70	=484.6+269.1
Hotel\housing	\$441.00	
Rental Car	\$115.04	
Gas	\$29.00	
Food/Per Diem	\$47.77	=18.2+3.58+25.99
Train/Metro/Taxi	\$106.50	=32+31.85+17.24+25.41
	\$1,493.01	

From: [American Airlines](#)
To: [Ryan Macias](#)
Subject: Your trip confirmation (DFW - DCA)
Date: Thursday, January 11, 2024 1:19:36 AM

[American Airlines home](#)



Issued: January 11, 2024

Your trip confirmation and receipt

We charged \$269.10 to your card ending in 4466 for your ticket purchase.

You can check in via the American app 24 hours before your flight and get your mobile boarding pass.

Record Locator: SISHIF

Wednesday, January 17, 2024

DFW

Dallas/Fort Worth

7:10 PM

AA 2752 ☐

DCA

Washington Reagan

11:00 PM

Seat:

Class: **Economy (G)**

Meals: **Refreshment**

[Manage your trip](#)

Earn 15,000 bonus miles

Plus no annual fee. Terms Apply.





Your purchase

Ryan Macias

[Join the AAdvantage® Program](#)

New ticket (0012106587837) \$269.10
[\$236.28 + Taxes & carrier-imposed fees \$32.82]

Total cost **\$269.10**

Your payment

MasterCard (ending 4466) \$269.10

Total paid **\$269.10**

Bag information

Checked Bag (Airport)

DFW - DCA

1st bag No charge

2nd bag No charge

Checked Bag (Online*)

DFW - DCA

1st bag No charge

2nd bag No charge

DFW - DCA

Maximum dimensions: 62 inches or 158 centimeters calculated as (length + width + height)

Maximum weight: 50 pounds or 23 kilograms

For information regarding American Airlines checked baggage policies, please visit: [Bag and optional fees](#)

Bag fees apply at each Check-in location. Additional allowances and/or discounts may apply. [Bag and optional fees](#)

If your flight is operated by a partner airline, see the [other airline's](#) website for carry-on and checked bag policies.

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Mujeeb on January 17
Date: Wednesday, January 17, 2024 9:58:35 PM

----- Forwarded message -----

From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Wed, Jan 17, 2024, 9:52 PM
Subject: Your ride with Mujeeb on January 17
To: [REDACTED] >

Lyft Pink



JANUARY 17, 2024 AT 9:23 PM

Thanks for riding with Mujeeb!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (6.92mi, 18m 52s)	\$28.94
Lyft Pink member-exclusive savings	-\$1.44
Tip	\$4.50



Visa *9429

\$32.00

You've already paid for this ride.

This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on January 17, 2024. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup 9:23 PM**
4 Aviation Cir, Arlington, VA
- ☐ **Drop-off 9:42 PM**
801 N Glebe Rd, Arlington, VA

Tip driver

Thanks for ordering, Ryan

Here's your receipt for Saigon Noodles & Grill.

Total	\$18.20
--------------	----------------

 #14 Vietnamese Style Grilled Chicken Sandwich	\$12.50
 #34 Chicken Pho W/ Chicken Broth	\$15.50
Choice of Size	
Large \$1.00	
Choice of Meat	
Chicken White Meat \$0.00	

Subtotal	\$28.00
Service Fee	\$4.68
Tax	\$2.81
Delivery Fee	\$0.49
Tip	\$5.39
Delivery Discount	-\$0.49
Promotion	-\$19.60
Membership Benefit	-\$3.08

Payments

 Work - Chase Sapphire ****9429	\$18.20
1/18/24 9:51 PM	

You ordered from Saigon Noodles & Grill

Picked up from

1776 Wilson Ave, Arlington, VA 22209, US

Delivered to

801 N Glebe Rd, Arlington, VA 22203, US

Starbucks @
Westin Arlington Lobby
Store # 75782
801 N. Glebe Rd.
Arlington, VA 22203
(703) 537-4288

75782002 Tigist

WS#: 1

CHK 6752
1/19/2024 7:10 AM

To Go

1 VT PIKE PLACE	3.25
Subtotal	\$3.25
Tax	\$0.33
Payment	\$3.58
Change Due	\$0.00
Visa	\$3.58
XXXXXXXXXXXX9429	

----- Check Closed -----
1/19/2024 7:10 AM

Join our loyalty program
Starbucks Rewards
Sign up for promotional emails
Visit [Starbucks.com/rewards](https://www.starbucks.com/rewards)
Or download our app
At participating stores
Some restrictions apply

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Eyob on January 19
Date: Friday, January 19, 2024 10:16:55 AM

----- Forwarded message -----
From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Fri, Jan 19, 2024, 7:45 AM
Subject: Your ride with Eyob on January 19
To: <[REDACTED]>



JANUARY 19, 2024 AT 7:18 AM

Thanks for riding with Eyob!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (5.21mi, 17m 54s)	\$27.69
Lyft Pink member-exclusive savings	-\$1.38
Tip	\$5.54

 Visa *9429	\$31.85
--	----------------

You've already paid for this ride.
This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on January 19, 2024. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map

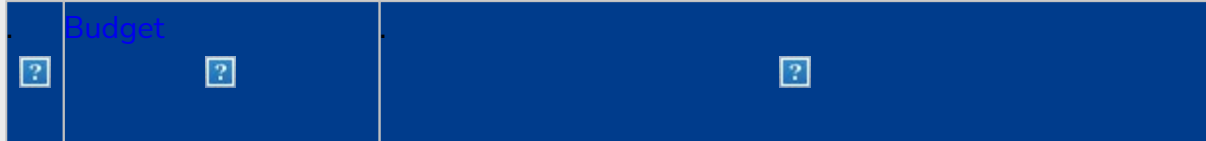



- ☐ **Pickup** 7:18 AM
801 N Glebe Rd Arlington, VA
- ☐ **Drop-off** 7:36 AM
2525 S Eads St, Arlington, VA

Tip driver

From: [Budget](#)
To: [Ryan Macias](#)
Subject: Your E-receipt From Budget
Date: Friday, January 19, 2024 6:18:59 PM

[View In Browser](#)
Add budget@e.budget.com to your Address Book





Hi Ryan,

Thank you for renting with Budget. **Please remember to return your keys when you return your vehicle to avoid additional fees.**

This is a one-time notification related to your recent transaction: Budget Rental Agreement **635645054**

TOTAL CHARGES

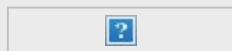
\$ 115.04

Base Rate:	\$ 24.54
Taxable Products/Services*:	\$ 65.04
Non-Taxable Products/Services:	\$ 16.50
Rental Sales Tax:	\$ 8.96
Net Charges:	\$ 115.04

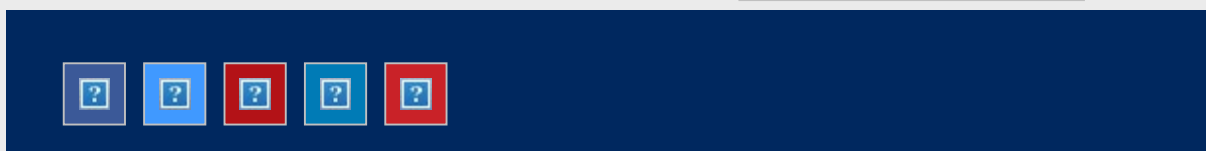
**Includes Fees and Surcharges*

Thanks for renting with us. We hope you had a sweet trip and a smooth ride.

Your e-receipt is available [here](#)



[budgettruck](#)



CRYSTAL CITY 2300 JEFFERSON DAVIS HWY
ARLINGTON, VA 22202
THANKS FOR YOUR BUSINESS

EXXON EXPRESS PAY

2300 JEFFERSON DAVIS
CRYSTAL CITY
XXXXXXXXXX6001
ARLINGTON , VA
22202
01/19/2024 845789678
06:15:22 PM

XXXXXXXXXXXX9429
Visa
INVOICE 054075
AUTH 00535I

PUMP# 2

Regular	7.715G
PRICE/GAL	\$3.759

FUEL TOTAL \$ 29.00

TOTAL = \$ 29.00

CREDIT \$ 29.00

=====

Customer-activated Purchase/Capture

Site #: 0000000004782827

Shift Number 1

Sequence Number 55235

Chip Read

CHASE VISA

Mode: Issuer

AID: A0000000031010

TVR: 0000000000

IAD: 0602120360A002

TSI: E000

ARC: 00

TC: 39500151BFE73475

APPROVED 00535I

EXHIBIT CF 24027

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Bonssa on January 19
Date: Friday, January 19, 2024 6:54:07 PM

----- Forwarded message -----
From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Fri, Jan 19, 2024, 6:53 PM
Subject: Your ride with Bonssa on January 19
To: [REDACTED] >

Lyft Pink



JANUARY 19, 2024 AT 6:31 PM

Thanks for riding with Bonssa!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (5.15mi, 19m 40s)	\$14.98
Lyft Pink member-exclusive savings	-\$0.74
Tip	\$3.00



Visa *9429

\$17.24

You've already paid for this ride.
This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on January 19, 2024. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup 6:31 PM**
2600 Richmond Hwy, Arlington, VA
- ☐ **Drop-off 6:50 PM**
801 N Glebe Rd, Arlington, VA

Tip driver

Thanks for ordering, Ryan

Here's your receipt for Akira Ramen & Izakaya - DC.

Total	\$25.99
--------------	----------------

1 Shrimp Tempura Ramen	\$18.50
2 Sashimi	\$26.00

Subtotal	\$44.50
Service Fee	\$7.13
Tax	\$1.89
Delivery Fee	\$3.99
Tip	\$8.62
Special Offer	-\$13.00
Delivery Discount	-\$3.99
Promotion	-\$20.00
Membership Benefit	-\$3.15

Payments

 Work - Chase Sapphire ****9429	\$25.99
1/19/24 9:06 PM	

You ordered from Akira Ramen & Izakaya - DC

Picked up from

2479 18th St NW, Washington, DC 20009, US

Delivered to

801 N Glebe Rd, Arlington, VA 22203, US

The Westin Arlington Gateway
801 North Glebe Road
Arlington, VA 22203
United States
Tel: 703-717-6200 Fax: 703-717-6204



RYAN MACIAS

Page Number : 1 Invoice Nbr : 1000234381
Guest Number :
Folio ID : A
Arrive Date : 18-JAN-24 09:56
Depart Date : 20-JAN-24 16:00
No. Of Guest : 1
Room Number : 1142
Marriott Bonvoy Number :

Information Invoice

The Westin Arl WASAG JAN-20-2024 03:10 9999

Date	Reference	Description	Charges (USD)	Credits (USD)
18-JAN-24	RT1142	Room Chrg - Special Corp	193.00	
18-JAN-24	RT1142	State Tax	11.58	
18-JAN-24	RT1142	County Tax	15.92	
19-JAN-24	RT1142	Room Chrg - Special Corp	193.00	
19-JAN-24	RT1142	State Tax	11.58	
19-JAN-24	RT1142	County Tax	15.92	
JAN-20-2024	VI	Visa Card		-441.00
** Total			441.00	-441.00
*** Balance			0.00	

I agreed to pay all room & incidental charges.

A rectangular box containing a handwritten signature in black ink.

Continued on the next page

From: [Ryan Macias](#)
To: [Ryan Macias](#)
Subject: Fwd: Your ride with Ashraf on January 20
Date: Saturday, January 20, 2024 9:43:57 AM

----- Forwarded message -----
From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Sat, Jan 20, 2024, 9:23 AM
Subject: Your ride with Ashraf on January 20
To: [REDACTED] >

Lyft Pink



JANUARY 20, 2024 AT 8:59 AM

Thanks for riding with Ashraf!

100% of tips go to drivers. [Add a tip](#)

Lyft fare (7.98mi, 17m 33s)	\$21.99
Wait time fee - 16 sec, Prime Time 10%	\$0.09
Lyft Pink member-exclusive savings	-\$1.09
Tip	\$4.42



Visa *9429

\$25.41

You've already paid for this ride.
This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on January 20, 2024. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other changes.

Ride Map



- ☐ **Pickup 8:59 AM**
801 N Glebe Rd Arlington, VA
- ☐ **Drop-off 9:16 AM**
2001 Thomas Ave, Arlington, VA

Tip driver

From: [American Airlines](#)
To: [Ryan Macias](#)
Subject: Your trip confirmation (DCA - SBP)
Date: Thursday, January 4, 2024 9:51:25 PM

[American Airlines home](#)



Issued: January 5, 2024

Your trip confirmation and receipt

You can check in via the American app 24 hours before your flight and get your mobile boarding pass.

Record Locator: YBEKQI

Saturday, January 20, 2024

DCA

Washington Reagan
10:20 AM

AA 1218 ☐

PHX

Phoenix
1:51 PM

Seat:
Class: **Economy (M)**
Meals: **Food for purchase**

PHX

Phoenix
3:03 PM

AA 3166
Operated by SkyWest Airlines
as American Eagle

SBP

San Luis Obispo
3:49 PM

Seat:
Class: **Economy (M)**
Meals:

[Manage your trip](#)

Earn 15,000 bonus miles

Plus no annual fee. Terms Apply.

[Learn more](#)



Your purchase

Ryan Macias

[Join the AAdvantage® Program](#)

New ticket (0012104770171) \$484.60
[\$427.91 + Taxes & carrier-imposed fees \$56.69]

Total cost **\$484.60**

Your payment

Flight Credit (ending 5959) \$467.60
MasterCard (ending 4466) \$17.00

Total paid **\$484.60**

Bag information

Checked Bag (Airport)

DCA - SBP

1st bag No charge

2nd bag No charge

Checked Bag (Online*)

DCA - SBP

1st bag No charge

2nd bag No charge

10

Search

Download

Post Date	Exit Date Time	Transaction	Tag	License	Entry	Exit	Class	Amount
01/21/2024	01/19/2024 18:41:20	E-ZPass Toll	02104807543		Fort Littleton	Norristown	1	\$21.30
01/21/2024	01/19/2024 10:28:31	E-ZPass Toll	02104807543		Valley Forge	Fort Littleton	1	\$19.90
Total Amount								\$41.20

A car rental was procured for court-ordered transfer-of-custody event in Fulton County on January 19. Due to the winter storm conditions on January 19, counsel rented a small SUV with all-wheel drive for safety purposes.

From: [Allianz Global Assistance\(Allianz Assistance USA\)](#)
To: [Wiygul, Robert A.](#)
Subject: Your rental car insurance plan: PLIUS1391777445
Date: Thursday, January 18, 2024 3:06:42 PM

[EXTERNAL EMAIL - This message originated outside Hangley Aronchick.]



Here's your plan information

Hi Robert,

Thank you for protecting your rental car with us.

Your insurance plan at a glance

Plan:	Purchase Date:
Rental Car Protector IV	January 18, 2024
Plan Number:	Effective Date:
PLIUS1391777445	January 18, 2024
Total Amount Paid:	Rental Car Date(s):
\$26.00	Jan. 18, 2024 – Jan. 20, 2024
Trip Number:	
46822572518	

[Read full plan details](#)

If you're not completely satisfied, you have 15 days (or more, depending on your state of residence) to request a refund, provided you haven't started your trip or initiated a claim. Premiums are non-refundable after this period.

Your rental car is protected by this plan. You do not need to purchase additional

collision/damage insurance at the car rental counter. [Learn more.](#)

Please save this email for future reference, and be sure to review your full plan documents using the button above. Let us know if your rental car reservation changes. The rental car supplier may not inform us if you adjust your plans.

If you have questions or need to make changes to your plan, [contact us online](#) or call [1-800-892-0130](tel:1-800-892-0130).

Sincerely,
Allianz Global Assistance



The Allianz TravelSmart™ App

TravelSmart™ with our free app to access your benefits on the go, connect with 24-hour assistance, file claims quickly, and more.



Quick Links

Claims Center

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FAQs

Get answers to commonly asked questions about plans, claims, and more. [Learn more.](#)

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Like us on Facebook for travel tips, destination guides, and more. [Learn more.](#)

24/7 Assistance

Our customer care team can help with travel hiccups, find pre-screened care facilities, and more. Call us [1-800-892-0130](tel:1-800-892-0130) (Toll-free, Domestic) or [1-804-281-5700](tel:1-804-281-5700) (Collect, International).



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REV 07/2021

Hertz
ROBERT WIYGUL

#01 PN RR 913734846
RES K7404699028
CC

INITIAL CHARGES

RENT RT \$ 46.85 /DAY @2 /DAYS \$ 93.70
SUBTOTAL T\$ 93.70

CHARGES ADDED DURING RENTAL

LDW DECLINED
LIS ACCEPTED @ \$ 18.85 DAY \$ 37.70
PAI, PEC DECLINED
PREM RD SVC DECLINED
* ADDITIONAL CHARGES

SERVICE CHARGES/TAXES

CONCESSION FEE RECOVERY 10.00% T\$ 9.37
PA SURCHARGE \$ 4.00
TAX 12.000% ON TAXABLE TTL OF \$ 103.07 \$ 12.36
TOTAL AMOUNT DUE \$ 157.13
CHARGED ON VISA XXXXXXXXXXXX1754

FOR EXPLANATION OF THE ABOVE CHARGES,
PLEASE ASK A REPRESENTATIVE OR GO TO
WWW.HERTZ.COM/CHARGEEXPLAINED

VEHICLE: 01398 /2136687 23 SPORTAGE 2.5 AN
LICENSE: FL HLFH77
FUEL: 94 % OUT 96 % IN
MILEAGE IN: 31779 TR-X MILES:
MILEAGE OUT: 31386 MILES ALLOWED:
MILES DRIVEN: 393 MILES CHARGED:
CDP: 00099

RENTED: AMTRAK-30TH ST STATION
RENTAL: 01/18/24 16:18
RETURN: 01/20/24 11:00
RETURNED: AMTRAK-30TH ST STATION
COMPLETED BY: 5689/PAPHD20

PLAN IN: OAUD2 RATE CLASS: Q4
PLAN OUT: OAUD2

www.Hertz.com

STATEMENT OF CHARGES - NOT VALID FOR RENTAL

WELCOME TO
7-ELEVEN

7-eLEVEN
1100 S 10th St At
PHILADELPHIA PA 19147

Description	Qty	Amount
UNLEADED CR #03	7.3066	24.10
SELF @ 3.299/ G		
Subtotal		24.10
Tax		0.00
TOTAL		24.10
CREDIT \$		24.10

VISA
*****7047
Entry: Swiped
Auth #: 01087C
Resp Code: 000
Stan: 11473685662
Invoice #: 168473
Store # *****

THANKS COME AGAIN

ST# 2757 TILL XXXX DR# 1 TRAN# 9036214
CSH: 0 1/20/24 10:35:56 AM

WELCOME TO
522 PIT STOP

522PitStop
29459 Great Cove
Fort Littleton PA 17223

< DUPLICATE RECEIPT >

Description	Qty	Amount
UNLD CR #02	6.841G	22.57
SELF @ 3.299/ G		
Subtotal		22.57
TOTAL		22.57
CREDIT \$		22.57

USD\$22.57

*****1754
Entry: Chip Read
AppName: VISA CREDIT
AuthNet: VISA
MODE: Issuer
AID: A00C0000031010
Auth #: 419183
Resp Code: 000
Stan: 08911126725
Invoice #: 141841
Shift #: 1
Store # *****

THANKS, COME AGAIN

ST#AB123 DR#1 TRAN#9029386
CSH: 0 1/19/24 3:41:24 PM

Thank you for being our Guest!
Applegreen

Starbucks @
PA Tpke Highspire Eastbound
Store # 78040
Milepost 247.4 E Pennsylvania Tpke
Middletown, Pennsylvania 17057
(717) 948-1639

78040005 Tylon

WS#: 1

CHK 85442
1/19/2024 5:00 PM

To Go

1 TL. CAPPUCCINO 4.85
SINGLE

RAW

Subtotal \$4.85
Tax \$0.29
Payment \$5.14

28000-050

Change Due \$0.00

Visa \$5.14
XXXXXXXXXXXX5623

Check Closed
1/19/2024 5:00 PM

SPECIAL
MASTER'S
EXHIBIT D

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.,)	
)	
Intervenor.)	

**INTERVENOR DOMINION VOTING SYSTEMS, INC.’S
BILL OF COSTS AND RELATED FEES AND EXPENSES**

Pursuant to this Court’s April 28, 2023 Order, Intervenor Dominion Voting Systems, Inc. (“Dominion”) files this Bill of Costs and Related Fees and Expenses and respectfully requests that the Special Master recommend an award of Dominion’s costs and attorneys’ fees as set forth herein consistent with the Pennsylvania Supreme Court’s April 19, 2023 Opinion (“Supreme Court Opinion”) in this matter.

INTRODUCTION

With this filing, Dominion seeks reimbursement for the legal costs and fees it has incurred for the purpose of preventing Fulton County (“County”) from allowing unauthorized exposure of and access to Dominion’s voting equipment (“Voting Equipment”), which efforts have been rendered essentially moot because of Fulton

County's obdurate, vexatious, and bad-faith contempt of the Supreme Court's injunction orders in this matter. *See* Supreme Court Opinion at p. 73. In support thereof, Dominion states as follows:

FACTUAL AND PROCEDURAL BACKGROUND

The factual and procedural background underlying this case are set forth at length in the Supreme Court Opinion, which is hereby incorporated by reference.

In its Opinion, the Supreme Court held that the County was in contempt of the Supreme Court's January 14, 2022 and January 27, 2022 Orders, which enjoined Petitioners from allowing any further third-party inspection of Dominion's Voting Equipment that was in the possession of the County after the 2020 general election. *See* Supreme Court Opinion, at p. 60 ("Accordingly, we adopt the Special Master's recommendation that this Court hold Fulton County in contempt of this Court.").

The Supreme Court further found the contemptuous conduct exhibited by the County and its counsel, Attorney Thomas J. Carroll ("Attorney Carroll") to be sanctionable in the form of counsel fees and costs payable to the Secretary of the Commonwealth ("Secretary"). *See* Supreme Court Opinion, at p. 73 ("In sum, we find that Attorney Carroll, both in tandem with and also independently of his clients, is guilty of relentlessly dilatory, obdurate, vexatious, and bad-faith conduct before this Court and the Special Master, especially, but not exclusively, during these sanction proceedings. Consequently, it would be inequitable that the County alone

should bear the Secretary's costs. Attorney Carroll, too, should be sanctioned in the form of joint and several responsibility for the Secretary's counsel fees during the period for which he shares responsibility for the misconduct.").

The Supreme Court further held that, in addition to the attorney's fees and costs payable to the Secretary, "Dominion's posture and entitlement to sanctions is materially identical to the Secretary's, so Dominion also is entitled to recover its counsel fees subject to the terms and limitations described above. It, too, may recover its reasonable counsel fees associated with the protection of the voting equipment incurred since December 17, 2021, through the conclusion of the instant sanction proceedings. And it may seek to recover fees from April 13, 2021 forward from the County and Attorney Carroll jointly and severally." *See* Supreme Court Opinion, at p. 76.

Thus, the Supreme Court Opinion entitles Dominion to collect reasonable attorneys' fees and costs: (1) from the County for legal work performed between December 17, 2021 through April 12, 2022; and (2) from the County and Attorney Carroll, jointly and severally, for legal work performed from April 13, 2022 until present.

The Supreme Court Opinion further returned jurisdiction over this case to the Special Master "to collect and review the parties' submissions, including the County's disputes, if any, of the amounts claimed. Once the Special Master has

completed this task, she will return to this Court findings and recommended fee awards along with an accounting of all relevant data and calculations employed in the task, separating the counsel fees incurred by the Secretary and Dominion.” *See* Supreme Court Opinion, at pp. 78-79.

In accordance with the Supreme Court’s directive, on April 28, 2023, the Special Master entered an Order, which provided, *inter alia*, that “[n]o later than May 30, 2023, Appellant Secretary of the Commonwealth (Secretary) and Intervenor Dominion Voting Systems, Inc. (Dominion) shall file and serve submissions documenting legal fees and costs of litigation incurred between: (a) December 17, 2021, and April 12, 2022, and (b) April 13, 2022, and ongoing. The submissions shall append all relevant and necessary documentation relating to said fees and costs.”

Dominion therefore files the within Bill of Costs and Related Expenses in accordance with this Court’s April 28, 2023 Order.

ARGUMENT

I. Legal Standard

In Pennsylvania, in determining the reasonable fee or compensation payable for an attorney’s representation, a court must consider:

[T]he amount of work performed; the character of the services rendered; the difficulty of the problems involved; the importance of the litigation; the amount of money or value of the property in question; the degree of responsibility incurred; whether the fund involved was ‘created’ by the

attorney; the professional skill and standing of the attorney in his profession; the result he was able to obtain...

Freeze v. Donegal Mut. Ins. Co., 603 A.2d 595, 602 (Pa. Super. 1992) *citing In re Estate of LaRocca*, 246 A.2d 337, 339 (Pa. 1968). Applying these factors to the facts at bar demonstrate that Dominion is entitled to recover legal fees in the amount of \$206,878.73 as reasonably incurred in protecting its Voting Equipment in this extended dispute.

II. Dominion is Entitled to \$206,878.73 In Attorneys' Fees and Costs

Buchanan Ingersoll & Rooney P.C. ("Buchanan") was engaged by Dominion on December 30, 2021 as Pennsylvania counsel on an emergency basis to prevent Fulton County from allowing an unauthorized third party, Envoy Sage LLC, from gaining access to its Voting Equipment, which is designated as United States Critical Infrastructure by the Department of Homeland Security. The total amount of fees and costs for incurred by Dominion for legal work performed by Buchanan from December 30 until present was \$206,878.73. *See* Affidavit of Shawn Gallagher ("Gallagher Aff.") ¶ 10, attached hereto as Exhibit A.

Specifically, from December 30, 2021 through April 12, 2022, Dominion incurred \$136,407.16 in legal fees and costs for legal work performed by Buchanan. *See* Gallagher Aff., at ¶ 10(a). Pursuant to the Supreme Court Opinion, the County is solely responsible for those costs and fees. *See* Supreme Court Opinion, at pp. 78-79.

From April 13, 2022 until present, Dominion has incurred \$70,471.57 in legal fees and costs for legal work performed by Buchanan. *See* Gallagher Aff., at ¶ 10(b). Pursuant to the Supreme Court Opinion, the County and Attorney Carroll are jointly and severally responsible for those costs and fees. *See* Supreme Court Opinion, at pp. 78-79.

A. The Amount of Work Performed

Dominion engaged Buchanan on an emergency basis on December 30, 2021. Working over the Christmas and New Year holidays, Buchanan worked diligently to prepare the filings, testimony, evidence and other documents necessary to support its application to intervene (“Intervention Application”), as well as attending the intervention hearing before the Commonwealth Court. *See* Gallagher Aff.; Affidavit of Kathleen Jones Goldman (“Goldman Aff.”), attached hereto as Exhibit B; Affidavit of Brendan Lucas (“Lucas Aff.”), attached hereto as Exhibit C; Affidavit of Robert Fitzgerald (“Fitzgerald Aff.”), attached hereto as Exhibit D; Affidavit of Stephanie Patton (“Patton Aff.”), attached hereto as Exhibit E.

Although its intervention was initially denied by the Commonwealth Court, Dominion was ultimately successful in overturning the Commonwealth Court’s denial of the Intervention Application upon appeal to the Supreme Court. *See* Supreme Court Opinion, at p. 15, fn. 50. Again, in doing so, Dominion incurred significant costs and attorneys’ fees from Buchanan throughout its appeal of the

denial of the Intervention Application to the Supreme Court. *See* Gallagher Aff., at Exhibit 1.

Dominion was again forced to incur significant legal fees and costs during the contempt proceedings in the matter, after the County yet again allowed unauthorized access to Dominion's Voting Equipment by a third-party, Speckin Forensics, LLC. *See* Supreme Court Opinion, at p. 26. During those proceedings, Buchanan's attorneys drafted filings, conducted legal research and attended various hearings before the Special Master on behalf of Dominion. *Id.* In addition, Dominion also prepared and filed an Application for Costs and Fees with the Supreme Court. Finally, Dominion's legal fees related to the contempt proceedings also include the research for and preparation of the instant Bill of Costs and Related Fees and Expenses. *See* Gallagher Aff., at Exhibit 1.

In total, Buchanan provided 358.40 hours of legal services over the course of more than 500 days for which Dominion seeks reimbursement.

B. Character of the Services Rendered

Buchanan's representation of Dominion required complex legal services to be performed in order to protect Dominion's Voting Equipment from unauthorized exposure to third parties, much of which was provided on an expedited basis. Notably, due to the emergency nature of the proceedings, approximately 42% of Dominion's total requested fee amount was incurred on the eleven days between

December 30, 2021 (the date of Buchanan’s engagement) and January 10, 2022 (the date of the Commonwealth Court’s hearing on Dominion’s Intervention Application). *See* Gallagher Aff., at Exhibit 1. Buchanan’s representation in this matter involved, among other things, complex legal research, technical drafting of appellate court filings with both the Commonwealth Court and Supreme Court, and appearances at numerous hearings.

C. The Importance of the Litigation and the Value of the Property Involved

Dominion’s Voting Equipment has been designated as “Critical Election Infrastructure” by the Department of Homeland Security. “Critical infrastructure” means that “the incapacity or destruction” of that infrastructure “would have a debilitating impact on [national] security.” 42 U.S.C. § 5195c(e). In addition, Dominion’s Voting Equipment contains Dominion’s proprietary hardware and software, which is essential to its business operations. Dominion’s and the public’s interest in protecting Dominion’s Voting Equipment in this case was paramount. Therefore, the importance of this litigation and the value of the property involved is undoubtedly significant.

D. The Degree of Responsibility Incurred

Dominion engaged Buchanan to assume full responsibility in this matter to protect its Voting Equipment from unauthorized exposure by the County. Dominion did not engage co-counsel to represent it in this matter.

E. Whether the Fund Involved was “Created” by the Attorney

Buchanan’s instructions in this action were to take all legal action necessary to protect Dominion’s Voting Equipment from unauthorized exposure by the County. Buchanan’s efforts to intervene in this case on behalf of Dominion did not result in any additional claims brought by the County against Dominion. Therefore, no fund of money resulted from Buchanan’s efforts in this matter.

F. The Professional Skill or Standing of the Attorneys in Their Profession

The professional biographies, qualifications and achievements of the Buchanan attorneys who performed the legal work necessary to protect Dominion’s Voting Equipment are set forth in further detail below in the discussion regarding the reasonableness of Buchanan’s charges and hourly rates.

G. The Result Obtained

Dominion’s ultimate goal in this case was to obtain intervenor status, enabling it to make filings to protect its Voting Equipment. After appeal of this Court’s denial of the Intervention Application, the Supreme Court granted Dominion the right to intervene in this matter. With the Supreme Court’s decision to allow Dominion’s intervention in this case and its January 14, 2022 and January 27, 2022 Orders enjoining the County from allowing any further third-party inspection of Dominion’s Voting Equipment pending resolution of the Secretary’s appeal, Buchanan achieved

Dominion's desired result. This is true notwithstanding the County's contemptuous actions to subvert a direct and unambiguous order of the Supreme Court.

H. Buchanan's Charges and Hourly Rates Are Reasonable

"As a general rule, the method of determining a fee for legal services provided on an hourly basis is to multiply the total number of hours reasonably expended by the reasonable hourly rate. The resulting figure is known as the 'lodestar' fee, and a court has the discretion to adjust the lodestar fee in light of the degree of success, the potential public benefit achieved, and the potential inadequacy of the private fee arrangement." *Signora v. Liberty Travel, Inc.*, 886 A.2d 284, 293 (Pa. Super. Ct. 2005), *overruled on other grounds by Andrews v. Cross Atl. Capital Partners, Inc.*, 158 A.3d 123 (Pa. Super. Ct. 2017).

Buchanan billed Dominion on an hourly basis in this matter. Over the course of the winding, two-year, multi-jurisdictional path that this matter took through the Commonwealth Court and the Supreme Court, the attorneys who billed time to the matter were: Shawn N. Gallagher, Kathleen Jones Goldman, Robert Fitzgerald, Brendan P. Lucas, and Stephanie Patton. See Exhibits A-E. In addition, Buchanan engaged FrontinoReporting, LLC to provide court reporting services for the November 9, 2022, November 10, 2022, and November 14, 2022 contempt hearings before this Court. See Gallagher Aff. at Exhibit 2.

Dominion’s lead counsel in this matter was Shawn N. Gallagher, a Shareholder at Buchanan specializing in election, litigation, energy and administrative law with 22 years of experience. *See* Gallagher Aff., at ¶¶ 3-5. Mr. Gallagher has been selected for inclusion in the Pennsylvania Super Lawyers Rising Stars list (from 2008 to 2013) and has since been included in Pennsylvania Super Lawyers list. *Id.* He has also been selected for inclusion in The Best Lawyers in America consistently since 2016. He was named Best Lawyers 2020 Land Use & Zoning Law “Lawyer of the Year” in Pittsburgh. *Id.* Mr. Gallagher is the former Chair of the Allegheny County Bar Association Environment and Energy Section Council. *Id.*

Mr. Gallagher has extensive appellate practice experience in Pennsylvania, notably as attorney of record in *Banfield, et al. v. Cortes, Secretary of the Commonwealth*, 110 A.3d 155 (Pa. 2015) (successfully defending the Secretary of State for the Commonwealth); *Huntley & Huntley, Inc. v. Borough Council of Borough of Oakmont*, 964 A.2d 855 (Pa. 2009) (successfully arguing that a local zoning ordinance was not preempted by the Pennsylvania Oil & Gas Act); *In re Dahlkemper*, 993 A.2d 868 (Pa. 2010); *In re Payton*, 945 A.2d 162 (Pa. 2008); *In re Rogers*, 959 A.2d 903 (Pa. 2008); *In re Porter*, 957 A.2d 232 (Pa. 2008); *In re Nomination Papers of Rogers*, 913 A.2d 298, (Pa. Cmwlth 2006) *aff’d*, 909 A.2d 299 (Pa. 2006), *cert. denied*, *Romanelli v. Board of Elections*, 127 S.Ct. 1265 (U.S. Pa. 2007); and *In re Nomination Paper of Rogers*, 907 A.2d 503 (Pa. 2006). During the

pertinent period, Mr. Gallagher's hourly rate ranged from \$615 to \$795 per hour, depending on the nature and locale of the litigation. Mr. Gallagher charged Dominion \$660 an hour throughout 2021 and 2022, increasing that rate to \$695 an hour in 2023. *Id.*

Dominion's counsel Kathleen Jones Goldman is a Shareholder at Buchanan with 25 years of experience in complex commercial litigation. *See* Goldman Aff., at ¶ 6. Ms. Goldman has been selected for inclusion in The Best Lawyers in America consistently since 2019 in the Commercial Litigation category. *Id.* Ms. Goldman was named to the BTI Client Service All-Stars 2017 list, an award based solely on unprompted feedback from corporate counsel at large and Fortune 1000 organizations. *Id.* During the pertinent period, Ms. Goldman's hourly rate ranged from \$520 to \$715 per hour, depending on the nature and locale of the litigation. Ms. Goldman charged Dominion \$555 an hour from 2021 through 2022, increasing that rate to \$625 an hour in 2023. *Id.* at ¶ 9.

Dominion's counsel Brendan P. Lucas is a Counsel at Buchanan with 9 years of experience practicing litigation, energy and administrative law. *See* Lucas Aff., at ¶¶ 3-4. Mr. Lucas has been named to the Super Lawyers Pennsylvania Rising Stars since 2019. *Id.* Mr. Lucas has extensive appellate practice experience, notably obtaining favorable decisions for his clients in *Municipality of Mt. Lebanon v. Gillen*, 151 A.3d 722 (Pa. Cmwlth. 2016), *Li Lan An v. Zoning Hearing Bd. of O'Hara Twp.*,

776 C.D. 2019, 2020 WL 2394268 (Pa. Cmwlth. May 12, 2020) and *Ctr. St. Luxury Apartments, LLC v. Town of Bloomsburg Zoning Hearing Bd.*, 290 A.3d 1281 (Pa. Cmwlth. 2022). *Id.* During the pertinent period, Mr. Lucas's hourly rate ranged from \$425 to \$585 per hour, depending on the nature and locale of the litigation. Mr. Lucas charged Dominion \$425 an hour during 2021, increasing that rate to \$490 an hour in 2022, and \$525 an hour in 2023. *See* Lucas Aff., at ¶ 7.

Dominion's counsel Robert J. Fitzgerald is a Senior Attorney at Buchanan with 23 years of experience in commercial and employment litigation matters. *See* Fitzgerald Aff., at ¶ 3. During the pertinent period, Mr. Fitzgerald's hourly rate ranged from \$450 to \$550 per hour, depending on the nature and locale of the litigation. Mr. Fitzgerald charged Dominion \$450 an hour during 2021, increasing that rate to \$475 an hour in 2022, and \$495 an hour in 2023. *Id.* at ¶ 6.

Dominion's counsel Stephanie Patton is an Associate Attorney at Buchanan with 2 years of experience in commercial litigation matters. *See* Patton Aff., at ¶ 3. During the pertinent period, Ms. Patton's hourly rate ranged from \$255 to \$360 per hour, depending on the nature and locale of the litigation. Ms. Patton charged Dominion \$295 per hour in 2022, increasing that rate to \$325 per hour in 2023. *Id.* at ¶ 6.

The hourly rates charged by Buchanan represent a reasonable market rate for the character and complexity of the legal services rendered in this action, the value of

the property at stake, and the results obtained, all as described above. *See* Gallagher Aff., at ¶ 9. Detailed time entries for Dominion's attorneys are included in the invoice attached as Exhibit 1 to the Gallagher Affidavit. These entries are set out with specificity and demonstrate that the hours were reasonably expended for each of the particular purposes described.

For all the reasons set forth above, Buchanan's charges to Dominion were reasonable.

CONCLUSION

For the foregoing reasons, Dominion respectfully asks that the Special Master recommend to the Supreme Court that Dominion's costs and fees be awarded as follows:

a. From the period between December 30, 2021 and April 12, 2022, the County is responsible for \$136,407.16 in legal fees and costs for legal work performed by Buchanan on behalf of Dominion.

b. From the period beginning April 13, 2022 until present, the County and Attorney Carroll are jointly and severally responsible for \$70,471.57 in legal fees and costs for legal work performed by Buchanan on behalf of Dominion.

Respectfully submitted,

Dated: May 30, 2023

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Shawn N. Gallagher

Shawn N. Gallagher (PA I.D. No. 88524)

Kathleen Jones Goldman (PA I.D. No. 90380)

Brendan P. Lucas (PA I.D. No. 314300)

Robert J. Fitzgerald (PA I.D. No. 85142)

Union Trust Building, Suite 200

501 Grant Street

Pittsburgh, PA 15219

Telephone: (412) 562-8362

Counsel for Dominion Voting Systems, Inc.

Exhibit A

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.,)	
)	
Intervenor.)	

AFFIDAVIT OF SHAWN N. GALLAGHER

I, Shawn N. Gallagher, hereby state and affirm the following:

1. I am a Shareholder at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.
2. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.
3. I received a J.D. degree from the University of Duquesne School of Law in May 2001 and a Certification in Environmental & Natural Resources Law

from the Northwestern School of Law of Lewis and Clark College in 2000. I also received a B.A. degree from Allegheny College in May 1996. I have actively practiced law, focusing on various election, litigation, energy and administrative law matters, since 2001, when I passed the Pennsylvania Bar Exam.

4. I have been selected for inclusion in the Pennsylvania Super Lawyers Rising Stars list (from 2008 to 2013) and have since been included in Pennsylvania Super Lawyers list. I have also been selected for inclusion in The Best Lawyers in America consistently since 2016. I was named Best Lawyers 2020 Land Use & Zoning Law “Lawyer of the Year” in Pittsburgh. I am the former Chair of the Allegheny County Bar Association Environment and Energy Section Council.

5. I have extensive appellate practice experience in Pennsylvania, notably as attorney of record in *Banfield, et al. v. Cortes, Secretary of the Commonwealth*, 110 A.3d 155 (Pa. 2015) (successfully defending the Secretary of State); *Huntley & Huntley, Inc. v. Borough Council of Borough of Oakmont*, 964 A.2d 855 (Pa. 2009) (successfully arguing that a local zoning ordinance was not preempted by the Pennsylvania Oil & Gas Act); *In re Dahlkemper*, 993 A.2d 868 (Pa. 2010); *In re Payton*, 945 A.2d 162 (Pa. 2008); *In re Rogers*, 959 A.2d 903 (Pa. 2008); *In re Porter*, 957 A.2d 232 (Pa. 2008); *In re Nomination Papers of Rogers*, 913 A.2d 298, (Pa. Cmwlth 2006) *aff'd*, 909 A.2d 299 (Pa. 2006), *cert. denied*, *Romanelli v. Board*

of Elections, 127 S.Ct. 1265 (U.S. Pa. 2007); and *In re Nomination Paper of Rogers*, 907 A.2d 503 (Pa. 2006).

6. Since December 2021, I have been Dominion's lead counsel in the above-captioned action.

7. As reflected in the Firm billing records attached as Exhibit 1 to this Affidavit, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I prepared pleadings of claims against County of Fulton to protect Dominion's commercial and contract rights; drafted the Emergency Application to Intervene in the above-captioned case before the Commonwealth Court; prepared for and attended the hearing on Dominion's Intervention Application; drafted the Application for Stay Pending Appeal of the denial of the Emergency Application to Intervene; drafted the Brief of Appellant in Dominion's appeal of the denial of the Emergency Application to Intervene; and drafted various filings for the contempt proceedings in the matter, including the Application for Costs and Fees filed with the Supreme Court. In addition, I appeared for Dominion at the hearings held during this matter, including the intervention hearing and contempt hearings.

8. During the pertinent period, my hourly rate ranged from \$615 to \$795 per hour, depending on the nature and locale of the litigation. The Firm charged

Dominion \$660 an hour for my time throughout 2021 and 2022, increasing that rate to \$695 an hour in 2023.

9. As the billing attorney for this matter, I attest that the hourly rates charged by Buchanan represent a reasonable market rate for the character and complexity of the legal services rendered in this action, the value of the property at stake, and the results obtained

10. Throughout the pertinent time periods set forth below, Dominion incurred at total of \$206,878.73 in legal fees and costs from Buchanan. This amount is comprised of:

a. \$136,407.16 in legal fees and costs for work provided by Buchanan from December 30, 2021 through April 12, 2022, which are shown on the itemized time entries contained in the invoices attached hereto as Exhibit 1 to this Affidavit.

b. \$70,471.57 legal fees and costs for work provided by Buchanan from April 12, 2022 through the present, which are shown on the itemized time entries contained in the invoices attached hereto as Exhibit 1 to this Affidavit.¹

¹ This amount includes \$5,704.00 in court reporting fees paid by Buchanan to FrontinoReporting, LLC for the November 9, 2022, November 10, 2022, and November 14, 2022 contempt hearings, the invoice for which is attached as Exhibit 2 to this Affidavit.

11. The work identified in this Affidavit was actually and necessarily performed by the Firm in connection with Dominion's efforts to protect its Voting Equipment in this matter.

12. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: May 30, 2023



By: _____

Shawn N. Gallagher

November 14, 2022 contempt hearings, the invoice for which is attached as Exhibit 2 to this Affidavit.

Exhibit 1

DOMINION VOTING

May 30, 2023



For Professional Services Rendered:

RE: FULTON COUNTY
Our Reference: 0089472

Legal Contact: S. Gallagher

Date	Timekeeper	Hours	Narrative
12/30/21	R. Fitzgerald	1.00	Reviewing pleadings in dispute between Fulton County and Secretary of the Commonwealth
12/30/21	B. Lucas	1.30	Research regarding Commonwealth Court original jurisdiction intervention; draft email memo to S. Gallagher regarding same
12/31/21	R. Fitzgerald	3.00	Preparing for and attending conference call regarding potential intervention; reviewing documents and filings relating to same
12/31/21	B. Lucas	4.20	Research regarding standards for intervention; begin to draft Emergency Application for Intervention
12/31/21	B. Lucas	1.40	Review Commonwealth Court pleadings and attend conference call with client regarding intervention
12/31/21	B. Lucas	0.70	Calls with S. Gallagher and R. Fitzgerald regarding drafting of applications
01/01/22	S. Gallagher	8.00	Work on emergency filings
01/01/22	B. Lucas	6.40	Research for and draft Emergency Application to Intervene
01/02/22	S. Gallagher	9.00	Continued work on emergency filings
01/02/22	R. Fitzgerald	6.00	Drafting complaint; reviewing and revising application for a protective order; reviewing and revising affidavit in support of motion to intervene
01/02/22	B. Lucas	7.10	Research for and draft Emergency Application for Protective Order
01/03/22	S. Gallagher	8.30	Continued work on emergency filing
01/03/22	R. Fitzgerald	4.80	Reviewing and revising application for a protective order; drafting entries of appearance

Date	Timekeeper	Hours	Narrative
01/04/22	R. Fitzgerald	2.40	Reviewing order scheduling hearing; attending telephone conference with client regarding same; drafting outline of examination of witness in support of petition to intervene
01/04/22	B. Lucas	2.40	Review order from court; call with S. Gallagher regarding same; research regarding procedure for Intervention Hearing
01/04/22	B. Lucas	1.50	Calls with S. Gallagher and R. Fitzgerald regarding strategy; research regarding intervention standard; review and compile accepted filing
01/05/22	K. Goldman	3.50	Multiple strategy calls with S Gallagher; review of filings to date; conference with client team.
01/05/22	S. Gallagher	8.20	Multiple calls with opposing counsel, client and DOS; work regarding filings; calls with court; work on related matters
01/05/22	R. Fitzgerald	3.00	Drafting outline of examination of witness in support of petition to intervene; reviewing proposed stipulations; drafting offer of proof; attending conference call with client regarding hearing on petition to intervene
01/05/22	B. Lucas	4.40	Research for evidentiary Intervention hearing; calls with S. Gallagher, K. Goldman, and R. Fitzgerald regarding strategy for addressing same; review and comment on stipulation; begin to prepare exhibits for hearing
01/06/22	K. Goldman	2.70	Review documents; multiple strategy calls with S Gallagher; B Lucas R Fitzgerald. Review correspondence from
01/06/22	S. Gallagher	8.30	Work on negotiated stipulations and exhibits; prepare witness and exhibit lists; prep for intervention hearing; work related to same
01/06/22	R. Fitzgerald	6.30	Reviewing answer of Petition to Dominion's petition to intervene; preparing for hearing on petition to intervene
01/06/22	B. Lucas	2.80	Review letters and affidavits filed by County; finalize and file joint stipulations; prepare exhibits for hearing; correspondence with court regarding WebEx video protocol and witnesses; calls with S. Gallagher regarding same
01/07/22	K. Goldman	6.20	Strategy calls; research; conferences with client team and Buchanan team; outline argument.
01/07/22	S. Gallagher	12.10	Prepare for and attend intervention hearing; multiple calls regarding strategy; multiple calls regarding protocols meeting/negotiations; calls and emails with opposing counsel; work regarding same
01/07/22	B. Lucas	4.60	Prepare for, attend and debrief Commonwealth Court hearing on intervention
01/09/22	S. Gallagher	5.80	Conference call with client; work on protocols; call with opposing counsel regarding protocols
01/10/22	S. Gallagher	1.70	Review and comment of protocols; calls and emails with client regarding same; review of order and opinion denying intervention; review of appeal options and related matters
01/10/22	B. Lucas	0.40	Review order denying intervention; begin to review avenues to appeal

Date	Timekeeper	Hours	Narrative
01/11/22	B. Lucas	1.50	Research regarding appeal of denial of intervention to Pa. Supreme Court; draft email memo to S. Gallagher regarding same
01/12/22	K. Goldman	0.30	Review of correspondence related to protocols; confer with S Gallagher
01/14/22	S. Gallagher	0.40	Review of opinion and order; call with client regarding same and inspection
01/18/22	B. Lucas	3.20	Review procedure and rules for filing notice of appeal and seeking a stay of voting machine inspection; draft notice of appeal and prepare exhibits for same
01/18/22	B. Lucas	2.80	Research for and draft application for stay pending appeal
01/18/22	S. Gallagher	2.00	Work on supreme court filings
01/18/22	R. Fitzgerald	5.00	Drafting jurisdictional statement; reviewing and revising application for stay pending appeal
01/19/22	S. Gallagher	1.60	Work related to supreme court filings
01/19/22	R. Fitzgerald	0.50	Reviewing jurisdictional statement and motion for stay pending appeal
01/19/22	B. Lucas	3.10	Review and finalize Notice of Appeal, Jurisdictional Statement and Application for Stay Pending appeal for filing; calls with S. Gallagher regarding same; calls and emails with Commonwealth Court tech support and prothonotary regarding same; file both with Commonwealth Court
01/19/22	B. Lucas	1.40	Review case law, rules and procedure for Supreme Court appeal; call with S. Gallagher regarding same
01/20/22	B. Lucas	0.60	Review Supreme Court orders and correspondence regarding appeal
01/21/22	S. Gallagher	0.30	Review of answer to jurisdictional statement
01/25/22	B. Lucas	0.70	Review correspondence from Supreme Court; review answer from County and rules for responding to same
01/26/22	S. Gallagher	0.50	Call with client; follow up work regarding testimony and report
02/02/22	S. Gallagher	1.80	Review of orders; work related to brief and records; circulate summary of same
02/02/22	R. Fitzgerald	0.50	Reviewing order for briefing; conferring with S. Gallagher and B. Lucas regarding same
02/02/22	B. Lucas	2.60	Review court order regarding expedited briefing schedule; begin research regarding same; calls with S. Gallagher
02/03/22	S. N. Patton	1.60	Research property or contractual rights as a basis for intervention under Pa. Rules of Civil Procedure
02/04/22	S. Gallagher	2.30	Work on brief
02/04/22	R. Fitzgerald	0.10	Drafting brief in support of appeal
02/04/22	B. Lucas	1.70	Research regarding collateral order doctrine for Supreme Court brief
02/05/22	R. Fitzgerald	1.80	Drafting appellate brief
02/06/22	B. Lucas	2.70	Prepare reproduced record and begin to draft brief challenging order denying intervention

Date	Timekeeper	Hours	Narrative
02/07/22	S. Gallagher	1.20	Work on briefs and relates matters
02/07/22	R. Fitzgerald	7.50	Drafting appellate brief
02/07/22	B. Lucas	4.70	Draft collateral order section of supreme court brief and begin to draft statement of the case portion
02/07/22	B. Lucas	2.10	Research regarding collateral order and intervention case law and standards for inclusion in supreme court brief
02/07/22	S. N. Patton	0.70	Intervention research
02/08/22	R. Fitzgerald	6.30	Drafting appellate brief
02/08/22	B. Lucas	3.10	Research regarding intervention/protective order standards; continue to draft brief in support of supreme court appeal
02/08/22	S. N. Patton	6.80	Complete research on whether contractual or property rights can be used as a basis for intervention under the Pa. Rules of Civil Procedure; prepare memorandum regarding same
02/09/22	R. Fitzgerald	0.20	Reviewing appellate brief
02/09/22	B. Lucas	3.40	Continue to draft argument section of supreme court brief
02/10/22	S. Gallagher	1.10	Review, revise and comment of brief and record
02/10/22	R. Fitzgerald	3.70	Drafting and revising appellate brief
02/10/22	B. Lucas	3.10	Research for and continue to draft Supreme Court brief
02/11/22	S. Gallagher	1.80	Continue work on brief and record
02/14/22	B. Lucas	0.70	Research regarding case law to attach as Appendix B to Brief
02/15/22	S. Gallagher	2.10	Work on brief
02/15/22	B. Lucas	3.20	Review client comments on supreme court brief; research regarding same and revise accordingly
02/15/22	B. Lucas	0.80	Research regarding intervention case law for inclusion in Supreme Court brief
02/16/22	B. Lucas	1.60	Finalize and coordinate filing of Brief and Reproduced Record with Supreme Court; draft email to S. Gallagher regarding same
03/02/22	S. Gallagher	1.90	Review of County's brief; review of Secretary's supreme court appeal
03/03/22	B. Lucas	0.70	Review Appellee's brief and case law cited in same
03/21/22	S. Gallagher	1.90	Review and circulate Supreme Court decision and related filings; review of status
03/22/22	S. Gallagher	0.90	Review of procedure and emails with client
04/20/22	S. Gallagher	0.40	Review of notices of withdrawal; call with client
05/17/22	S. Gallagher	0.50	Review of orders; circulate summary of same
05/24/22	B. Lucas	0.50	Review Commonwealth Court opinion regarding Secretary's preliminary objections; draft email to S. Gallagher regarding same; correspondence with Commonwealth Court
06/01/22	B. Lucas	0.40	Correspondence with Commonwealth Court prothonotary regarding docket status and notifications
06/17/22	S. Gallagher	0.40	Review of Secretary's supplemental brief; circulate same

Date	Timekeeper	Hours	Narrative
07/11/22	S. Gallagher	0.40	Check on status of litigation; email client regarding same
07/26/22	S. Gallagher	0.40	Review of court filings and circulate same
09/22/22	B. Lucas	0.60	Review Fulton County complaint and exhibits; draft emails to S. Gallagher regarding same
10/18/22	S. Gallagher	1.00	Work regarding sanctions motion; email client regarding same; review of same
10/24/22	S. Gallagher	0.90	Review of scheduling order; emails with client regarding same
10/26/22	S. Gallagher	1.90	Call with client; review of memorandums; multiple calls and emails with client regarding joinder of same
10/26/22	B. Lucas	1.10	Review court order regarding contempt proceedings; draft joinder and review rules regarding same; draft joinder; calls with S. Gallagher regarding same
10/27/22	S. Gallagher	3.10	Multiple calls and emails with client regarding status conference; prepare for and attend same; draft summary of same; follow up work regarding same
10/27/22	B. Lucas	0.60	Attend status conference with Commonwealth Court regarding contempt proceedings
10/28/22	S. Gallagher	3.10	Conference call with opposing counsel regarding schedule; calls and emails with L. Kurtz regarding same; call with P. Logan regarding Fulton County litigation; multiple emails with T. Carroll regarding same; review of court scheduling order; emails with L. Kurtz regarding same
10/31/22	S. Gallagher	2.10	Multiple calls and emails with client regarding discovery and hearing; review of discovery requests; conference with K. Goldman regarding objections and motion in limine
11/01/22	S. Gallagher	0.60	Work regarding discovery, depositions and hearings; call with client regarding same; draft email summary of status
11/01/22	B. Lucas	1.10	Review court orders regarding discover; meeting with S. Gallagher to discuss same; begin to prepare filings regarding same
11/02/22	S. Gallagher	0.80	Review of emergency injunction and discovery responses; review of court orders; circulate summary of same
11/02/22	B. Lucas	0.60	Review Petitioner's Emergency Application to Enjoin Discovery; call with S. Gallagher regarding same
11/03/22	S. Gallagher	1.80	Review of discovery responses and motion to compel; prepare for depositions
11/03/22	B. Lucas	0.30	Review Commonwealth Court orders; draft emails to S. Gallagher regarding same
11/04/22	S. Gallagher	2.50	Review and circulate discovery sanctions and objections; call with client; prepare for and attend status conference; circulate summary of same
11/04/22	B. Lucas	0.30	Review Court's order regarding Emergency Application to enjoin; call with S. Gallagher regarding same

Date	Timekeeper	Hours	Narrative
11/07/22	K. Goldman	2.50	Review of emergency filings from Fulton Co. Confer with B Lucas and S Gallagher. Appear for deposition of commissioners; confer with counsel for Sec of State. Make record.
11/07/22	S. Gallagher	0.50	Review and circulate various pleadings; call with client regarding same
11/07/22	B. Lucas	1.50	Review Supreme Court and Commonwealth Court orders and Emergency Applications; draft emails and calls with S. Gallagher regarding same; draft witness/exhibit list for hearing on contempt
11/08/22	K. Goldman	1.20	Appear for deposition. Confer with S Gallagher; review of filings.
11/08/22	B. Lucas	0.40	Review orders and draft emails to S. Gallagher regarding same; call with S. Gallagher regarding hearing on contempt
11/09/22	S. Gallagher	7.00	Attend contempt and sanctions hearing; call with client
11/09/22	B. Lucas	0.60	Review orders in Commonwealth Court case; draft emails to S. Gallagher and K. Goldman regarding same
11/10/22	S. Gallagher	8.80	Attend hearing; call with client
11/10/22	B. Lucas	0.40	Review orders; call with S. Gallagher regarding same
11/11/22	S. Gallagher	0.60	Review and respond to court order; circulate summary of status
11/11/22	B. Lucas	0.40	Review orders of court and call with S. Gallagher regarding same
11/14/22	S. Gallagher	3.20	Attend contempt hearing
11/15/22	B. Lucas	0.60	Prepare joinder/adoption of Secretary's post-hearing submission
11/16/22	S. Gallagher	1.30	Coordinate filing with Secretary; review of proposed decisions; call with client; circulate transcripts and other documents
11/16/22	B. Lucas	1.10	Review post-hearing submissions by Secretary and County; revise, finalize and file notice of adoption/joinder of Secretary's submission
11/18/22	S. Gallagher	1.10	Review of orders and recommendation; circulate same
11/21/22	K. Goldman	1.20	Conference with S Gallagher regarding and review of fee recovery issue; review of Court's Report and Recommendations.
11/21/22	S. Gallagher	0.40	Multiple calls and emails with client regarding costs and fees issue
11/21/22	B. Lucas	1.30	Review Commonwealth Court's recommendation order on contempt to Supreme Court; call with S. Gallagher regarding obtaining attorneys fees from County
11/28/22	B. Lucas	4.70	Research for and begin to draft Application for Costs and Fees to be paid by Fulton County
11/28/22	B. Lucas	1.60	Research case law and statutes for Application for Costs and Fees to be paid by Fulton County
11/29/22	B. Lucas	5.10	Continue to draft Application for Fees and Costs to be payable by Fulton County
11/30/22	B. Lucas	2.70	Finalize first draft of Application for Costs and Fees; draft email to S. Gallagher regarding same
11/30/22	B. Lucas	1.20	Research case law and statutory provisions regarding attorneys fees for Application for Fees and Costs

Date	Timekeeper	Hours	Narrative
12/05/22	B. Lucas	0.40	Review additional court notices; revise Application for Costs and Fees
12/07/22	B. Lucas	1.20	Revise, finalize and file Application for Costs and Fees with Supreme Court
12/08/22	B. Lucas	0.60	Review Supreme Court orders regarding fee application; prepare and transmit letter to Court regarding original filing
04/19/23	S. Gallagher	1.30	Review of Supreme Court opinion; circulate same
04/19/23	B. Lucas	0.80	Review Supreme Court opinions and order granting sanctions and attorneys fees; draft emails regarding same
04/20/23	R. Fitzgerald	0.50	Reviewing opinion regarding award of attorneys' fees
04/21/23	B. Lucas	0.50	Review procedures for obtaining attorneys fees in Supreme Court order
04/23/23	R. Fitzgerald	0.50	Conferring with S. Gallagher via email regarding procedure for seeking attorneys' fees
04/24/23	S. Gallagher	0.50	Continue review and analysis of opinion
04/28/23	S. Gallagher	0.90	Review of order of court; circulate same; work related to fees
05/04/23	B. Lucas	0.70	Research regarding requirements for bill of costs
05/05/23	S. Gallagher	1.20	Consultation with Secretary regarding third party escrow agent; work regarding the same
05/18/23	S. Gallagher	2.20	Work on third party escrow for machines; emails with client; work on bill of costs and fees
05/18/23	B. Lucas	1.30	Research regarding documentation for attorneys fees; call with S. Gallagher regarding same
05/19/23	S. Gallagher	0.30	Continue work regarding escrowing of machines
05/22/23	S. Gallagher	1.30	Continue work on court filings
05/23/23	B. Lucas	2.40	Research regarding case law for Bill of Costs; begin to draft same
05/24/23	R. Fitzgerald	1.10	Preparing affidavit in support of petition for fees
05/24/23	B. Lucas	4.80	Draft Bill of Costs and Related Fees; draft supporting affidavits for same
05/25/23	K. Goldman	0.80	Draft fee petition affidavit and draft edits to petition.
05/25/23	S. Gallagher	1.90	Conference with B. Lucas; continue work on filings and affidavit; emails with client regarding same and joint status report
05/25/23	B. Lucas	2.80	Revise Bill of Costs and Related Fees and supporting affidavits; calls with S. Gallagher regarding same
05/25/23	B. Lucas	0.70	Call with K. Goldman; draft additional revisions to affidavits and Bill of Costs and Related Fees
05/25/23	S. N. Patton	0.20	Review time entries and prepare affidavit in support of same
05/26/23	B. Lucas	1.20	Revise affidavits per calls with participating attorneys; revise Bill of Costs; review invoices related to same
05/30/23	B. Lucas	2.50	Revise, finalize and file Bill of Costs and Related Fees and supporting affidavits

Date	Timekeeper	Hours	Narrative
	Total Hours	358.40	
		Total Fees	\$198,629.00

DESCRIPTION OF COSTS

	Description	Amount
01/18/22	On-Line Search Service – Westlaw – January 2022	80.00
01/19/22	Filing Fee for Notice of Appeal & Jurisdictional Statement	90.25
01/20/22	Express Mail - UPS Tracking #1Z2641051397434266	37.92
02/04/22	Express Mail - UPS Tracking #1Z78A87E4497180384	67.66
02/04/22	Express Mail - UPS Tracking #1Z78A87E4497180384	0.00
02/07/22	On-Line Search Service – Westlaw – February 2022	40.00
02/10/22	BNA Doc Deliv Billable Charges for FEB 2022 INV 6888349871-B. Lucas	106.00
02/16/22	Express Mail - UPS Tracking #1Z2641050191156804	58.35
02/16/22	B&W AND COLOR BLOWBACKS	938.58
02/18/22	Photocopies - S. Gallagher	47.00
02/18/22	Office Services - S. Gallagher	2.70
02/18/22	Color Photocopies - S. Gallagher	37.20
09/22/22	Outside Delivery Services / Messengers, Courier Fees for Expedited Copy of Fulton County Complaint	600.00
09/22/22	Gas Surcharge - Courier for Expedited Copy of Fulton County Complaint	20.00
09/22/22	Mileage for Courier for Expedited Copy of Fulton County Complaint	172.57
09/22/22	Copy Fees of Fulton County Complaint	146.00
09/22/22	Tolls, Tolls for Courier for Expedited Copy of Fulton County Complaint	58.00
11/17/22	Transcripts from 11/9/22, 11/10/22 and 11/14/22 Hearings	5,704.00
12/08/22	Photocopies - S. Gallagher	41.40
12/08/22	Color Photocopies - S. Gallagher	2.10
	Total Costs	\$8,249.73

Total:	\$206,878.73
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TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
B. Lucas	Associate	7.60	425.00	3,230.00
B. Lucas	Counsel	110.40	490.00	54,096.00
B. Lucas	Counsel	17.70	525.00	9,292.50
K. Goldman	Partner	17.60	555.00	9,768.00
K. Goldman	Partner	0.80	625.00	500.00
R. Fitzgerald	Senior Attorney	4.00	450.00	1,800.00
R. Fitzgerald	Senior Attorney	48.10	475.00	22,847.50
R. Fitzgerald	Senior Attorney	2.10	495.00	1,039.50
S. Gallagher	Partner	130.00	660.00	85,800.00
S. Gallagher	Partner	10.80	695.00	7,506.00
S. N. Patton	Associate	9.10	295.00	2,684.50
S. N. Patton	Associate	0.20	295.00	65.00
Total		358.40		198,629.00

Exhibit 2



FrontinoReporting, LLC
 Frontino/DeFilippis Court Reporting Agency
 34 North Front Street
 Philadelphia, PA 19106
 215 922-2133
 billing@frontinoreporting.com
 EIN 26-1643920

Videography
 Post-Production Editing
 Trial Presentation Audio
 Transcription
 Portable Video Conferencing
 Translation Services

Local - National - Worldwide • Video Conferencing Center • Philadelphia and Cherry Hill

BILL TO:
 Shawn N. Gallagher Esquire
 Buchanan Ingersoll & Rooney
 Two Liberty Place
 50 South 16th Street - Suite 3200
 Philadelphia, PA 19102

INVOICE:	FR2022-581
DATE:	11/17/2022
PAYMENT:	\$
BALANCE DUE:	\$5,704.00

CAPTION	FILE/CLAIM NO.	JOB NO.	REP
Fulton Cty v Commonwealth of PA		1715LD	FLF

DATE	DESCRIPTION	QTY	RATE	AMOUNT
11/09/2022	One Copy - Daily Copy 11-9-2022 Hearing Daily copy final was delivered next day	301	8.00	2,408.00
11/10/2022	One Copy - Daily Copy 11-10-2022 Hearing Daily copy final was delivered next day	314	8.00	2,512.00
11/14/2022	One Copy - Daily Copy 11-14-2022 Hearing Daily copy final was delivered next day	98	8.00	784.00
				Subtotal: 5,704.00

THANK YOU FOR YOUR BUSINESS!

Exhibit B

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.,)	
)	
Intervenor.)	

AFFIDAVIT OF KATHLEEN JONES GOLDMAN

I, Kathleen Jones Goldman, hereby state and affirm the following:

1. I am a Shareholder at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and I am an attorney licensed to practice in Pennsylvania, West Virginia and Ohio.
2. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.
3. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.

4. I received a J.D. degree from West Virginia University College of Law in 1995. I also received a B.A. degree from Wheaton College in Norton, Massachusetts in 1992.

5. I have actively practiced law in the Commonwealth of Pennsylvania focusing on various complex litigation matters since September of 2006, when I began my employment with the Firm.

6. I have practiced law for over 25 years in numerous jurisdictions throughout the United States of America. I have represented clients before numerous state and federal courts and I have extensive appellate experience, notably obtaining favorable decisions for my clients in *Norfolk Southern Railway Co v. Pittsburgh & West Virginia Railroad*, No. 16-1195 (3d Cir. 2017) and *Mallet & Co., Inc. v. Lacayo*, No. 20-3584 (3d Cir. 2021). I have been selected for inclusion in The Best Lawyers in America consistently since 2019 in the Commercial Litigation category and I was named to the BTI Client Service All-Stars 2017 list, an award based solely on unprompted feedback from corporate counsel at large and Fortune 1000 organizations.

7. I have assisted Mr. Gallagher and the rest of the Buchanan team in representing Dominion in the above-captioned action since December 2021.

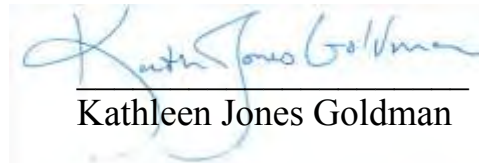
8. As reflected in the Firm billing records attached to the accompanying Affidavit of Shawn N. Gallagher, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I assisted

in the research and drafting of the Emergency Application to Intervene in the above-captioned case before the Commonwealth Court; assisted in the preparation for hearing on Application to Intervene; and appeared for the depositions of a number of witnesses during the contempt proceedings in this matter.

9. During the pertinent period, my hourly rate ranged from \$520 to \$715 per hour, depending on the nature and locale of the litigation. For my time in this matter, the firm charged Dominion \$555 an hour from 2021 through 2022, increasing that rate to \$625 an hour in 2023.

10. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: May 30, 2023



Kathleen Jones Goldman

Exhibit C

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.,)	
)	
Intervenor.)	

AFFIDAVIT OF BRENDAN P. LUCAS

I, Brendan P. Lucas, hereby state and affirm the following:

1. I am a Counsel at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.
2. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.
3. I received a J.D. degree from the University of Pittsburgh Law School in November 2012. I also received a B.A. degree from the University of Virginia in

May 2008. I have actively practiced law, focusing on various complex litigation, energy and administrative law matters, since June 2014, when I began my employment at the Firm.

4. I have been named to the Super Lawyers Pennsylvania Rising Stars since 2019 and I have extensive appellate experience, notably obtaining favorable decisions for my clients in *Municipality of Mt. Lebanon v. Gillen*, 151 A.3d 722 (Pa. Cmwlth. 2016), *Li Lan An v. Zoning Hearing Bd. of O'Hara Twp.*, 776 C.D. 2019, 2020 WL 2394268 (Pa. Cmwlth. May 12, 2020) and *Ctr. St. Luxury Apartments, LLC v. Town of Bloomsburg Zoning Hearing Bd.*, 290 A.3d 1281 (Pa. Cmwlth. 2022).

5. I have assisted Mr. Gallagher with representing Dominion in the above-captioned action since December 2021.

6. As reflected in the Firm billing records attached to the accompanying Affidavit of Shawn N. Gallagher, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I prepared draft pleadings of claims against County of Fulton to protect Dominion's commercial and contract rights; assisted in drafting the Emergency Application to Intervene in the above-captioned case before the Commonwealth Court; assisted in the preparation for hearing on Application to Intervene; assisted in drafting the

Application for Stay Pending Appeal of the denial of the Emergency Application to Intervene; assisted in drafting the Brief of Appellant in Dominion's appeal of the denial of the Emergency Application to Intervene; and assisted in drafting various filings for the contempt proceedings in this matter, including the Application for Costs and Fees filed with the Supreme Court.

7. During the pertinent period, my hourly rate ranged from \$425 to \$585 per hour, depending on the nature and locale of the litigation. For my time in this matter, the firm charged Dominion \$425 an hour during 2021, increasing that rate to \$490 an hour in 2022, and \$525 an hour in 2023.

8. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: May 30, 2023

A handwritten signature in blue ink, appearing to read "Brendan P. Lucas", is positioned above a horizontal line.

Brendan P. Lucas

Exhibit D

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.,)	
)	
Intervenor.)	

AFFIDAVIT OF ROBERT J. FITZGERALD

I, Robert J. Fitzgerald, hereby state and affirm the following:

1. I am a Senior Attorney at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.
2. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.
3. I received a J.D. degree from the University of Pennsylvania Law School in 1999. I also hold a B.A. degree from the University of Notre Dame and

an M.T.S. degree from Weston Jesuit School of Theology (NKA Boston College School of Theology and Ministry). I have actively practiced law, focusing on various complex litigation matters, since April 2000, when I was admitted to the Pennsylvania bar.

4. I have assisted Mr. Gallagher with representing Dominion in the above-captioned action since December 2021.

5. As reflected in the Firm billing records attached to the accompanying Affidavit of Shawn N. Gallagher, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I prepared draft pleadings of claims against County of Fulton to protect Dominion's commercial and contract rights; assisted in drafting the Emergency Application to Intervene in the above-captioned case before the Commonwealth Court; assisted in the preparation for the hearing on Application to Intervene; assisted in drafting the Application for Stay Pending Appeal of the denial of the Emergency Application to Intervene; and assisted in drafting the Brief of Appellant in Dominion's appeal of the denial of the Emergency Application to Intervene.

6. During the pertinent period, my hourly rate ranged from \$450 to \$550 per hour, depending on the nature and locale of the litigation. For my time in this

matter, the firm charged Dominion \$450 an hour during 2021, increasing that rate to \$475 an hour in 2022, and \$495 an hour in 2023.

7. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: May 30, 2023



Robert J. Fitzgerald

Exhibit E

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.,)	
)	
Intervenor.)	

AFFIDAVIT OF STEPHANIE N. PATTON

I, Stephanie N. Patton, hereby state and affirm the following:

1. I am an Associate at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.

2. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.

3. I received a J.D. degree from Widener Commonwealth Law School in May 2021. I also received a B.A. degree from Shippensburg University in May 2013

and a M.P.A. degree from the Pennsylvania State University in May 2015. I have actively practiced law, focusing on various complex litigation matters, since October 2021, when I was admitted to the Pennsylvania bar.

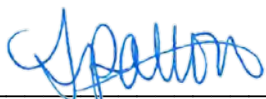
4. I assisted Mr. Gallagher with representing Dominion in the above-captioned action.

5. As reflected in the Firm billing records attached to the accompanying Affidavit of Shawn N. Gallagher, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I conducted research relating to the Intervention Application.

6. During the pertinent period, my hourly rate ranged from \$255 to \$360 per hour, depending on the nature and locale of the litigation. For my time in this matter, the firm charged Dominion \$295 per hour in 2022, increasing that rate to \$325 per hour in 2023.

7. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: May 30, 2023



Stephanie N. Patton

CERTIFICATE OF COMPLIANCE WITH PUBLIC ACCESS POLICY

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted By: Shawn N. Gallagher

Signature: /s/Shawn Gallagher
PA I.D. No. 88524

Dated: May 30, 2023

SPECIAL
MASTER'S
EXHIBIT E

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.)	
)	
Intervenor.)	

**INTERVENOR DOMINION VOTING SYSTEMS, INC.’S FIRST
SUPPLEMENTAL BILL OF COSTS AND RELATED FEES AND EXPENSES**

Pursuant to this Court’s February 23, 2024 Order, Intervenor Dominion Voting Systems, Inc. (“Dominion”) files this First Supplemental Bill of Costs and Related Fees and Expenses (“First Supplemental Bill of Costs”) and respectfully requests that the Special Master recommend an award of Dominion’s costs and attorneys’ fees as set forth herein consistent with the Pennsylvania Supreme Court’s April 19, 2023 Opinion (“Supreme Court Opinion”) in this matter.

INTRODUCTION

With this filing, Dominion seeks additional reimbursement for the legal costs and fees it has incurred for the purpose of preventing Fulton County (“County”) and

its Commissioners from allowing unauthorized exposure of and access to Dominion's voting equipment ("Voting Equipment"), which efforts have been rendered essentially moot because of Fulton County's and its attorneys' obdurate, vexatious, and bad-faith contempt of the Supreme Court's injunction orders in this matter. *See* Supreme Court Opinion at p. 73. The purpose of this First Supplemental Bill of Costs is to document and request reimbursement for Dominion's legal fees and costs in this matter incurred by Dominion after it filed its original Bill of Costs and Related Fees and Expenses on May 30, 2023 ("Initial Bill of Costs").

As detailed below, and in the accompanying affidavits and documentation, Dominion respectfully submits that, in addition to the amounts previously sought Dominion's Initial Bill of Costs, it should be reimbursed an additional amount of \$130,522.65. The entirety of that additional amount was incurred after April 12, 2022. Therefore, in accordance with the Supreme Court Opinion, the Dominion respectfully requests an order holding Fulton County, Stuart Ulsh, Randy Bunch, and Attorney Carroll jointly and severally liable for payment of \$130,522.65 in addition to the amounts sought in Dominion's Initial Bill of Costs.

In total, including its Initial Bill of Costs, Dominion is entitled to total of \$337,401.38 in litigation fees and costs pursuant to the Supreme Court Opinion.¹

¹ Of that amount, \$136,407.16 was incurred up to and through April 12, 2022, and \$200,994.22 was incurred after April 12, 2022. Therefore, in accordance with

FACTUAL AND PROCEDURAL BACKGROUND

In its Opinion, the Supreme Court held that the County was in contempt of the Supreme Court's January 14, 2022 and January 27, 2022 Orders, which enjoined Petitioners from allowing any further third-party inspection of Dominion's Voting Equipment that was in the possession of the County after the 2020 general election. *See* Supreme Court Opinion, at p. 60 ("Accordingly, we adopt the Special Master's recommendation that this Court hold Fulton County in contempt of this Court.").

The Supreme Court further found the contemptuous conduct exhibited by the County and its counsel, Attorney Thomas J. Carroll ("Attorney Carroll") to be sanctionable in the form of counsel fees and costs payable to the Secretary of the Commonwealth ("Secretary"). *See* Supreme Court Opinion, at p. 73 ("In sum, we find that Attorney Carroll, both in tandem with and also independently of his clients, is guilty of relentlessly dilatory, obdurate, vexatious, and bad-faith conduct before this Court and the Special Master, especially, but not exclusively, during these sanction proceedings. Consequently, it would be inequitable that the County alone should bear the Secretary's costs. Attorney Carroll, too, should be sanctioned in the

the Supreme Court Opinion: (1) Fulton County, Stuart Ulsh, and Randy Bunch are jointly and severally liable for payment of \$136,407.16 to Dominion; and (2) Fulton County, Stuart Ulsh, Randy Bunch and Attorney Carroll are jointly and severally liable for payment of \$200,994.22 to Dominion.

form of joint and several responsibility for the Secretary's counsel fees during the period for which he shares responsibility for the misconduct.").

The Supreme Court also held that, in addition to the attorney's fees and costs payable to the Secretary, "Dominion's posture and entitlement to sanctions is materially identical to the Secretary's, so Dominion also is entitled to recover its counsel fees subject to the terms and limitations described above. It, too, may recover its reasonable counsel fees associated with the protection of the voting equipment incurred since December 17, 2021, through the conclusion of the instant sanction proceedings. And it may seek to recover fees from April 13, 2021 forward from the County and Attorney Carroll jointly and severally." *See* Supreme Court Opinion, at p. 76.

Thus, the Supreme Court Opinion entitles Dominion to collect reasonable attorneys' fees and costs: (1) from the County for legal work performed between December 17, 2021 through April 12, 2022; and (2) from the County and Attorney Carroll, jointly and severally, for legal work performed from April 13, 2022 until present.

The Supreme Court Opinion further returned jurisdiction over this case to the Special Master "to collect and review the parties' submissions, including the County's disputes, if any, of the amounts claimed. Once the Special Master has completed this task, she will return to this Court findings and recommended fee

awards along with an accounting of all relevant data and calculations employed in the task, separating the counsel fees incurred by the Secretary and Dominion.” *See* Supreme Court Opinion, at pp. 78-79.

In accordance with the Supreme Court’s directive, on April 28, 2023, the Special Master entered an Order, which provided, *inter alia*, that “[n]o later than May 30, 2023, Appellant Secretary of the Commonwealth (Secretary) and Intervenor Dominion Voting Systems, Inc. (Dominion) shall file and serve submissions documenting legal fees and costs of litigation incurred between: (a) December 17, 2021, and April 12, 2022, and (b) April 13, 2022, and ongoing. The submissions shall append all relevant and necessary documentation relating to said fees and costs.”

On May 30, 2023, Dominion filed its Initial Bill of Costs, which requested the following reimbursements for legal work and costs in this matter: (1) \$136,407.16 for the period between December 30, 2021 and April 12, 2022, for which Fulton County, Stuart Ulsh and Randy Bunch are jointly and severally liable; and (2) \$70,471.57 for period beginning April 13, 2022 until May 30, 2023, for which Fulton County, Stuart Ulsh, Randy Bunch and Attorney Carroll are jointly and severally responsible. The total amount sought by Dominion in the Initial Bill of Costs was \$206,878.73.

After Dominion’s Initial Bill of Costs was filed, the sanction proceedings against the County continued. In particular, extensive litigation ensued with respect

to appointment of a neutral escrow agent who would take custody of the Dominion's Voting Equipment pursuant to the Supreme Court Opinion. Dominion incurred significant legal expenses for its counsel to attend and participate in said proceedings, and also for its counsel to eventually attend and monitor the transfer of the Voting Equipment from the County to Pro V&V, the neutral escrow agent ultimately selected by the Special Master. *See* Memorandum Opinion at p. 56 (Sept. 15, 2023).

Dominion was again further forced to incur significant legal fees due to Petitioners' contemptuous conduct when it became aware that the County intended to again expose Dominion's Voting Equipment to unauthorized third parties. Specifically, in bold and shocking defiance of the Supreme Court's January 27, 2022 injunction order ("Injunction Order") and the Supreme Court Opinion, Commissioner Bunch and Commissioner Ulsh publicly voted on December 27, 2023 to allow Attorney Stephanie Lambert's other clients to utilize the information illegally copied from the Voting Equipment during the Wake TSI and Speckin Forensics inspections. In response to Petitioners' plans, on January 9, 2024, Dominion's counsel was forced to prepare and file an Emergency Application to Enforce Supreme Court Order and for Hearing to Hold Petitioners in Contempt ("Emergency Application"). On January 10, 2024, the Special Master entered an order granting Dominion's Emergency Application in part (enjoining Petitioners' planned dissemination of Dominion's Confidential Information to Attorney Lambert's clients) and transferred the

Emergency Application to the Supreme Court for further proceedings, to the extent it sought enforcement of the Injunction Order.

On February 23, 2024, the Special Master entered an order directing Dominion to file and serve a submission documenting legal fees and costs of litigation incurred between May 30, 2023 and January 31, 2024.² Dominion therefore files the within First Supplemental Bill of in accordance with this Court’s February 23, 2024 Order.

ARGUMENT

I. Legal Standard

In Pennsylvania, in determining the reasonable fee or compensation payable for an attorney’s representation, a court must consider:

[T]he amount of work performed; the character of the services rendered; the difficulty of the problems involved; the importance of the litigation; the amount of money or value of the property in question; the degree of

²Dominion presumes that the Special Master chose January 31, 2024 as the “cutoff date” for fees incurred because that is the date through which the Secretary requested legal fees in its Second Supplemental Application for an Award of Fees and Costs. However, Dominion has incurred legal fees related to the contempt proceedings after January 31, 2024, including the preparation of this First Supplemental Bill of Costs and Related Fees and Expenses. Accordingly, as set forth below, Dominion will separately account for legal expenses incurred after January 31, 2024, but respectfully requests that the Special Master award such fees to Dominion as well. *See* Supreme Court Opinion, at 74, 78 (holding that the Secretary and Dominion are entitled to “all ***protective-order and sanctions-related counsel fees***” and “costs of litigation” “in the Commonwealth Court and [the Supreme] Court from December 17, 2021,” “through the conclusion of these sanction proceedings, ***including proceedings necessary to determine the reasonable fees...***”) (emphasis added).

responsibility incurred; whether the fund involved was ‘created’ by the attorney; the professional skill and standing of the attorney in his profession; the result he was able to obtain...

Freeze v. Donegal Mut. Ins. Co., 603 A.2d 595, 602 (Pa. Super. 1992) *citing In re Estate of LaRocca*, 246 A.2d 337, 339 (Pa. 1968). Applying these factors to the facts at bar demonstrate that Dominion is entitled to recover legal fees in the amount of \$130,522.65 from May 31, 2023 until present, in addition to the amount sought in its Initial Bill of Costs, as reasonably incurred in protecting its Voting Equipment in this extended dispute.

II. Dominion is Entitled to \$130,522.65 In Additional Attorneys’ Fees and Costs

The total amount of fees and costs for incurred by Dominion for legal work performed by Buchanan Ingersoll & Rooney PC (“Buchanan”) from May 31, 2023 until present was \$130,522.65.³ *See* Affidavit of Shawn Gallagher (“Gallagher Aff.”), at ¶ 10, attached hereto as Exhibit A. Pursuant to the Supreme Court Opinion, Petitioners and Attorney Carroll are jointly and severally responsible for those costs and fees. *See* Supreme Court Opinion, at pp. 78-79.

³ If the amount is calculated from May 31, 2023 until January 31, 2024, then the total amount incurred was \$120,262.65. *See* Gallagher Aff., at ¶ 10.

A. The Amount of Work Performed

After Dominion filed its Initial Bill of Costs on May 30, 2023, extensive litigation ensued with respect to appointment of the escrow agent who would take custody of the voting equipment at issue pursuant to the Supreme Court Opinion (“Impoundment Proceedings”). *See* Supreme Court Opinion, at p. 78. At Petitioners’ request, the Special Master held an evidentiary hearing in August 2023 regarding selection of the escrow agent.

The vast majority of the Dominion’s fees at issue in this First Supplemental Bill of Costs arose from the Impoundment Proceedings. Those proceedings required the Dominion’s counsel to, *inter alia*, prepare for and participate in a three-day evidentiary hearing convened in August 2023 *at Petitioners’ request*. *See* Memorandum Opinion at 6 (Sept. 15, 2022) (noting that the Special Master “indulged the County’s request for a hearing”). Petitioners’ efforts to delay and obstruct that hearing substantially increased Dominion’s costs and fees. *Id.* at 22 (“admonish[ing] [Petitioners’ counsel] for his continued bad-faith litigation conduct”).

Indeed, a significant portion of the fees and costs included in this First Supplemental Bill of Costs were the direct result of Petitioners’ “continu[ing] bad faith litigation conduct.” Memorandum Opinion at 22 (Sept. 15, 2023). Dominion incurred these fees and costs because Petitioners requested an evidentiary hearing regarding the appointment of a third-party escrow agent to take possession of the

voting machines at issue—and then did everything in their power to delay and obstruct both the hearing itself and, more generally, the impoundment of the voting machines ordered by the Supreme Court. *Id.* at 21 (expressing the Special Master's “deep concerns regarding the County's continuous pattern of dilatory conduct throughout the impoundment proceedings”).

Nonetheless, throughout all of the proceedings covered by this First Supplemental Bill of Costs, Dominion’s legal team operated efficiently, with most of the work performed by two shareholders and one counsel at Buchanan (Attorneys Shawn N. Gallagher, Kathleen Goldman Jones, and Brendan Lucas, respectfully). *See* Gallagher Aff.; Affidavit of Kathleen Jones Goldman (“Goldman Aff.”), attached hereto as Exhibit B; Affidavit of Brendan Lucas (“Lucas Aff.”), attached hereto as Exhibit C.

In addition to the Impoundment Proceedings, Dominion was also forced to incur significant legal fees when it became aware that the County Commissioners had voted to allow Attorney Stephanie Lambert’s other clients to utilize the information illegally copied from the Voting Equipment during the Wake TSI and Speckin Forensics inspections. In response to Petitioners’ plans, on January 9, 2024, Buchanan was forced to prepare and file its Emergency Application seeking to enjoin the illegal dissemination. Notably, this work was performed almost solely by Attorney Lucas, who has the lowest billing rate of the three Buchanan attorneys

working on this matter. Further, the Special Master granted the injunction sought by Dominion in the Emergency Application. These fees are collectible because they are “protective-order and sanctions-related counsel fees” incurred directly as a result of Petitioners’ violation of the Supreme Court’s Injunction Order. *See* Supreme Court Opinion, at pp. 78.

Finally, Dominion incurred significant fees throughout the remainder of the Impoundment Proceedings, including negotiations of the escrow agreement and responding to Petitioners continued bad faith attempts to avoid setting a date for the transfer of the Voting Equipment to Pro V&V. Dominion’s counsel was also forced to travel to and attend the transfer of Dominion’s Voting Equipment to Pro V&V in Fulton County, again incurring significant legal expenses.

In total, from May 31, 2023 until present, Buchanan provided 199.9 hours of legal services over the course of more than 290 days for which Dominion seeks reimbursement.

B. Character of the Services Rendered

Buchanan’s representation of Dominion required complex legal services to be performed in short order to protect Dominion’s Voting Equipment from unauthorized exposure to third parties, much of which was provided on an expedited basis. Buchanan’s representation in this matter involved, among other things, complex legal

research, technical drafting of appellate court filings with both the Commonwealth Court and Supreme Court, and appearances at numerous hearings.

C. The Importance of the Litigation and the Value of the Property Involved

Dominion's Voting Equipment has been designated as "Critical Election Infrastructure" by the Department of Homeland Security. "Critical infrastructure" means that "the incapacity or destruction" of that infrastructure "would have a debilitating impact on [national] security." 42 U.S.C. § 5195c(e). In addition, Dominion's Voting Equipment contains Dominion's proprietary hardware and software, which is essential to its business operations. Dominion's and the public's interest in protecting Dominion's Voting Equipment in this case was paramount. Therefore, the importance of this litigation and the value of the property involved is undoubtedly significant.

D. The Degree of Responsibility Incurred

Dominion engaged Buchanan to assume full responsibility in this matter to protect its Voting Equipment from unauthorized exposure by Petitioners. Dominion did not engage co-counsel to represent it in this matter.

E. Whether the Fund Involved was "Created" by the Attorney

Buchanan's instructions in this action were to take all legal action necessary to protect Dominion's Voting Equipment from unauthorized exposure by the County.

Buchanan's efforts to intervene in this case on behalf of Dominion did not result in any additional claims brought by the County against Dominion. Therefore, no fund of money resulted from Buchanan's efforts in this matter.

F. The Professional Skill or Standing of the Attorneys in Their Profession

The professional biographies, qualifications and achievements of the Buchanan attorneys who performed the legal work necessary to protect Dominion's Voting Equipment are set forth in further detail below in the discussion regarding the reasonableness of Buchanan's charges and hourly rates.

G. The Result Obtained

Dominion's ultimate goal in the portion of the proceedings that are the subject of this First Supplemental Bill of Cost was to ensure that its Voting Equipment (including its Confidential Information) remained protected and that the physical portions of the equipment were safely transferred to a neutral third party. Despite Petitioners outrageous dilatory conduct during the Impoundment Proceedings, Dominion was ultimately successful in obtaining its goal of transferring its Voting Equipment to an EAC-accredited escrow agent, Pro V&V. Dominion was further successful with its Emergency Application that convinced the Special Master to enjoin any further dissemination of Dominion's Confidential Information, which the

Supreme Court defined as part of Dominion’s Voting Equipment, thus subjecting it to its contempt and sanctions determination.⁴

H. Buchanan’s Charges and Hourly Rates Are Reasonable

“As a general rule, the method of determining a fee for legal services provided on an hourly basis is to multiply the total number of hours reasonably expended by the reasonable hourly rate. The resulting figure is known as the ‘lodestar’ fee, and a court has the discretion to adjust the lodestar fee in light of the degree of success, the potential public benefit achieved, and the potential inadequacy of the private fee arrangement.” *Signora v. Liberty Travel, Inc.*, 886 A.2d 284, 293 (Pa. Super. Ct. 2005), *overruled on other grounds by Andrews v. Cross Atl. Capital Partners, Inc.*, 158 A.3d 123 (Pa. Super. Ct. 2017).

Buchanan billed Dominion on an hourly basis in this matter. Between May 31, 2023 and March 21, 2024, the attorneys who billed time to the matter were: Shawn N. Gallagher, Kathleen Jones Goldman and Brendan P. Lucas. *See Exhibits A-C*. In addition, Buchanan engaged Sargent’s Court Reporting Service to provide court

⁴ The Supreme Court Opinion specifically provides that “[Dominion’s Democracy Suite 5.5A Election Management System (“EMS”) [] is a term that covers all devices *and software* involved in running an election. Depending on context, we refer to it primarily as ‘voting equipment.’” *See* Supreme Court Opinion, at p. 4 (emphasis added).

reporting services for the August 28, 2023, August 30, 2023 and August 31, 2023 impoundment hearings before the Special Master. *See* Gallagher Aff. at Exhibit 2.

Dominion's lead counsel in this matter was Shawn N. Gallagher, a Shareholder at Buchanan specializing in election, litigation, energy and administrative law with 22 years of experience. *See* Gallagher Aff., at ¶¶ 3-5. Mr. Gallagher has been selected for inclusion in the Pennsylvania Super Lawyers Rising Stars list (from 2008 to 2013) and has since been included in Pennsylvania Super Lawyers list. *Id.* He has also been selected for inclusion in The Best Lawyers in America consistently since 2016. He was named Best Lawyers 2020 Land Use & Zoning Law "Lawyer of the Year" in Pittsburgh. *Id.* Mr. Gallagher is the former Chair of the Allegheny County Bar Association Environment and Energy Section Council. *Id.*

Mr. Gallagher has extensive appellate practice experience in Pennsylvania, notably as attorney of record in *Banfield, et al. v. Cortes, Secretary of the Commonwealth*, 110 A.3d 155 (Pa. 2015) (successfully defending the Secretary of State for the Commonwealth); *Huntley & Huntley, Inc. v. Borough Council of Borough of Oakmont*, 964 A.2d 855 (Pa. 2009) (successfully arguing that a local zoning ordinance was not preempted by the Pennsylvania Oil & Gas Act); *In re Dahlkemper*, 993 A.2d 868 (Pa. 2010); *In re Payton*, 945 A.2d 162 (Pa. 2008); *In re Rogers*, 959 A.2d 903 (Pa. 2008); *In re Porter*, 957 A.2d 232 (Pa. 2008); *In re Nomination Papers of Rogers*, 913 A.2d 298, (Pa. Cmwlth 2006) *aff'd*, 909 A.2d 299

(Pa. 2006), *cert. denied*, *Romanelli v. Board of Elections*, 127 S.Ct. 1265 (U.S. Pa. 2007); and *In re Nomination Paper of Rogers*, 907 A.2d 503 (Pa. 2006). During the pertinent period, Mr. Gallagher's hourly rate ranged from \$615 to \$795 per hour, depending on the nature and locale of the litigation. Mr. Gallagher charged Dominion \$695 an hour throughout 2023, increasing that rate to \$725 an hour in 2024. *Id.*

Dominion's counsel Kathleen Jones Goldman is a Shareholder at Buchanan with 25 years of experience in complex commercial litigation. *See* Goldman Aff., at ¶ 6. Ms. Goldman has been selected for inclusion in The Best Lawyers in America consistently since 2019 in the Commercial Litigation category. *Id.* Ms. Goldman was named to the BTI Client Service All-Stars 2017 list, an award based solely on unprompted feedback from corporate counsel at large and Fortune 1000 organizations. *Id.* During the pertinent period, Ms. Goldman's hourly rate ranged from \$520 to \$715 per hour, depending on the nature and locale of the litigation. Ms. Goldman charged Dominion \$625 an hour in throughout 2023 and 2024. *Id.* at ¶ 9.

Dominion's counsel Brendan P. Lucas is a Counsel at Buchanan with 10 years of experience practicing litigation, energy and administrative law. *See* Lucas Aff., at ¶¶ 3-4. Mr. Lucas has been named to the Super Lawyers Pennsylvania Rising Stars since 2019. *Id.* Mr. Lucas has extensive appellate practice experience, notably obtaining favorable decisions for his clients in *Municipality of Mt. Lebanon v. Gillen*, 151 A.3d 722 (Pa. Cmwlth. 2016), *Li Lan An v. Zoning Hearing Bd. of O'Hara Twp.*,

776 C.D. 2019, 2020 WL 2394268 (Pa. Cmwlth. May 12, 2020) and *Ctr. St. Luxury Apartments, LLC v. Town of Bloomsburg Zoning Hearing Bd.*, 290 A.3d 1281 (Pa. Cmwlth. 2022). *Id.* During the pertinent period, Mr. Lucas's hourly rate ranged from \$525 to \$585 per hour, depending on the nature and locale of the litigation. Mr. Lucas charged Dominion \$525 an hour during 2023, increasing that rate to \$565 an hour in 2024. *See* Lucas Aff., at ¶ 7.

The hourly rates charged by Buchanan represent a reasonable market rate for the character and complexity of the legal services rendered in this action, the value of the property at stake, and the results obtained, all as described above. *See* Gallagher Aff., at ¶ 9. Detailed time entries for Dominion's attorneys are included in the invoice attached as Exhibit 1 to the Gallagher Affidavit. These entries are set out with specificity and demonstrate that the hours were reasonably expended for each of the particular purposes described.

For all the reasons set forth above, Buchanan's charges to Dominion were reasonable.

CONCLUSION

As shown in the accompanying affidavits and documentation, Dominion should be reimbursed a total of \$130,522.65 in addition to the amounts sought in Dominion's Initial Bill of Costs. Accordingly, including the amounts set forth in the Initial Bill of Costs, Dominion should be reimbursed a total of \$337,401.38.

Of that amount, \$136,407.16 was incurred up to and through April 12, 2022, and \$200,994.22 was incurred after April 12, 2022. Therefore, in accordance with the Supreme Court Opinion, Dominion respectfully requests that the Special Master recommend an order holding Fulton County, Stuart Ulsh, and Randy Bunch jointly and severally liable for payment of \$136,407.16 to Dominion, and holding Fulton County, Stuart Ulsh, Randy Bunch, and Attorney Carroll jointly and severally liable for payment of \$200,994.22 to Dominion.

Dominion further requests that the Special Master's recommendation to the Supreme Court be without prejudice Dominion's ability to request an additional award of compensable fees and costs at an appropriate future date.

Respectfully submitted,

Dated: March 19, 2024

BUCHANAN INGERSOLL & ROONEY PC

By: /s/ Shawn N. Gallagher

Shawn N. Gallagher (PA I.D. No. 88524)

Brendan P. Lucas (PA I.D. No. 314300)

Robert J. Fitzgerald (PA I.D. No. 85142)

Union Trust Building, Suite 200

501 Grant Street

Pittsburgh, PA 15219

Telephone: (412) 562-8362

Counsel for Dominion Voting Systems, Inc.

Exhibit A

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.)	
)	
Intervenor.)	

AFFIDAVIT OF SHAWN N. GALLAGHER

I, Shawn N. Gallagher, hereby state and affirm the following:

1. I am a Shareholder at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.
2. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.
3. I received a J.D. degree from the University of Duquesne School of Law in May 2001 and a Certification in Environmental & Natural Resources Law

from the Northwestern School of Law of Lewis and Clark College in 2000. I also received a B.A. degree from Allegheny College in May 1996. I have actively practiced law, focusing on various election, litigation, energy and administrative law matters, since 2001, when I passed the Pennsylvania Bar Exam.

4. I have been selected for inclusion in the Pennsylvania Super Lawyers Rising Stars list (from 2008 to 2013) and have since been included in Pennsylvania Super Lawyers list. I have also been selected for inclusion in The Best Lawyers in America consistently since 2016. I was named Best Lawyers 2020 Land Use & Zoning Law “Lawyer of the Year” in Pittsburgh. I am the former Chair of the Allegheny County Bar Association Environment and Energy Section Council.

5. I have extensive appellate practice experience in Pennsylvania, notably as attorney of record in *Banfield, et al. v. Cortes, Secretary of the Commonwealth*, 110 A.3d 155 (Pa. 2015) (successfully defending the Secretary of State); *Huntley & Huntley, Inc. v. Borough Council of Borough of Oakmont*, 964 A.2d 855 (Pa. 2009) (successfully arguing that a local zoning ordinance was not preempted by the Pennsylvania Oil & Gas Act); *In re Dahlkemper*, 993 A.2d 868 (Pa. 2010); *In re Payton*, 945 A.2d 162 (Pa. 2008); *In re Rogers*, 959 A.2d 903 (Pa. 2008); *In re Porter*, 957 A.2d 232 (Pa. 2008); *In re Nomination Papers of Rogers*, 913 A.2d 298, (Pa. Cmwlth 2006) *aff'd*, 909 A.2d 299 (Pa. 2006), *cert. denied*, *Romanelli v. Board*

of Elections, 127 S.Ct. 1265 (U.S. Pa. 2007); and *In re Nomination Paper of Rogers*, 907 A.2d 503 (Pa. 2006).

6. Since December 2021, I have been Dominion's lead counsel in the above-captioned action.

7. As reflected in the Firm billing records attached as Exhibit 1 to this Affidavit, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I prepared pleadings of claims against County of Fulton to protect Dominion's commercial and contract rights; drafted the Emergency Application to Intervene in the above-captioned case before the Commonwealth Court; prepared for and attended the hearing on Dominion's Intervention Application; drafted the Application for Stay Pending Appeal of the denial of the Emergency Application to Intervene; drafted the Brief of Appellant in Dominion's appeal of the denial of the Emergency Application to Intervene; and drafted various filings for the contempt proceedings in the matter, including the Application for Costs and Fees filed with the Supreme Court. In addition, I appeared for Dominion at the hearings held during this matter, including the intervention hearing and contempt hearings.

After Dominion submitted its Initial Bill of Costs, I also drafted various pleadings and other documents related to the Impoundment Proceedings. In

addition, I provided support for Kathleen Goldman Jones during the impoundment hearings. Finally, I traveled to and attended the transfer of Dominion's Voting Equipment to Pro V&V on January 19, 2024.

8. During the pertinent period, my hourly rate ranged from \$615 to \$795 per hour, depending on the nature and locale of the litigation. The Firm charged Dominion \$695 an hour for my time in 2023, increasing that rate to \$725 an hour in 2024.

9. As the billing attorney for this matter, I attest that the hourly rates charged by Buchanan represent a reasonable market rate for the character and complexity of the legal services rendered in this action, the value of the property at stake, and the results obtained

10. From May 31, 2023 until March 15, 2024, Buchanan charged Dominion \$130,522.65¹ in legal fees and costs, which are shown on the itemized time entries contained in the invoices attached hereto as Exhibit 1 to this Affidavit.²

¹ If the amount is calculated from May 31, 2023 until January 31, 2024, then the total amount incurred was \$120,262.65.

² This amount includes \$3,408.15 in court reporting fees paid to Sargent's Court Reporting Service to provide court reporting services for the August 28, 2023, August 30, 2023 and August 31, 2023 impoundment hearings before the Special Master, the invoices for which are attached as Exhibit 2 to this Affidavit.

11. The work identified in this Affidavit was actually and necessarily performed by the Firm in connection with Dominion's efforts to protect its Voting Equipment in this matter.

12. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: March 19, 2024



By: _____
Shawn N. Gallagher

Exhibit 1



Union Trust Building
501 Grant Street – Suite 200
Pittsburgh, PA 15219-4413
T 412 582 8800
F 412 582 1041
www.bipc.com

DOMINION VOTING



March 15, 2024

INVOICE SUMMARY

For Professional Services Rendered:

RE: FULTON COUNTY
Our Reference: 0089472-000005

Legal Contact: S. Gallagher

Fees:	\$127,114.50
Disbursements:	<u>\$3,408.15</u>

Total Current Invoice:	\$130,522.65
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DOMINION VOTING

March 15, 2024

For Professional Services Rendered:

RE: FULTON COUNTY
Our Reference: 0089472-000005

Legal Contact: S. Gallagher

Date	Timekeeper	Narrative	Hours	Amount
05/31/23	S. Gallagher	Review of secretary's filings and joint status report	0.80	556.00
06/02/23	S. Gallagher	Review of court order; correspondence with counsel; circulate order and other filings; emails with client	0.50	347.50
06/02/23	B. Lucas	Prepare and transmit hard copy of Bill of Costs to Commonwealth Court	0.20	105.00
06/06/23	S. Gallagher	Multiple calls and emails with counsel regarding third party escrow issues; emails with client; work regarding same	0.70	486.50
06/13/23	S. Gallagher	Review of proposal from Fulton County; research regarding Cerberus Dynamic Solutions; consult with client regarding same; receipt and review of Petition for Writ of Certiorari with US Supreme Court; circulate same	1.30	903.50
06/13/23	B. Lucas	Review background of proposed escrow agent	0.30	157.50
06/14/23	S. Gallagher	Multiple emails and calls with counsel regarding joint status report and escrow agent; attention to same; multiple emails with client	1.20	834.00
06/21/23	S. Gallagher	Continue attention to third party escrow agent; emails with client regarding same	0.40	278.00
06/22/23	S. Gallagher	Call with counsel and continue work related to escrow agent	0.40	278.00
06/28/23	S. Gallagher	Calls and emails with opposing counsel; review and comment of joint status report	0.50	347.50
06/29/23	S. Gallagher	Review of order; emails with client regarding same	0.30	208.50
07/13/23	S. Gallagher	Review, revise and circulate application to appoint escrow agent	0.70	486.50
07/13/23	B. Lucas	Research for and revise application to appoint third party escrow agent;	2.30	1,207.50
07/17/23	S. Gallagher	Review of and circulate U.S. Supreme Court filing	0.90	625.50

Date	Timekeeper	Narrative	Hours	Amount
07/17/23	B. Lucas	Review Petition for Writ of Certiorari and U.S. Supreme Court procedure regarding same	1.10	577.50
07/17/23	B. Lucas	Revise Application to Appoint Escrow Agent	0.70	367.50
07/18/23	S. Gallagher	Calls and emails with opposing counsel regarding joint status report and related matters; attention to same	1.20	834.00
07/18/23	B. Lucas	Review escrow agent proposals; revise application to appoint escrow agent regarding same	0.60	315.00
07/19/23	S. Gallagher	Review of court order; emails with client; review of new Lambert filing	0.70	486.50
07/19/23	B. Lucas	Review Michigan lawsuit regarding unauthorized access to Fulton County machines; draft email to S. Gallagher regarding same; review court order	0.70	367.50
07/25/23	B. Lucas	Revise and transmit US Supreme Court Bar Admission materials to Supreme Court for Petition for Writ of Certiorari	0.70	367.50
07/26/23	B. Lucas	Revise application to appoint escrow agent in light of recent proposals; research regarding alternate proposal; draft emails regarding same	1.50	787.50
07/27/23	B. Lucas	Review correspondence from Secretary and Petitioners regarding escrow agent; revise application accordingly	0.40	210.00
07/28/23	S. Gallagher	Emails and calls with counsel regarding joint status report and application issues; emails with client; finalize application; call with client	1.90	1,320.50
08/03/23	K. Goldman	Review of Order and client information relating to hearing on 8/28	0.80	500.00
08/07/23	K. Goldman	Review of documents related to issues concerning upcoming hearing. Conference with counsel	2.20	1,375.00
08/07/23	S. Gallagher	Call with counsel regarding hearing and related issues; work related to same	1.30	903.50
08/08/23	S. Gallagher	Correspondence with client regarding status	0.30	208.50
08/14/23	K. Goldman	Confer with S. Gallagher re: escrow hearing. Prepare for the same.	1.40	875.00
08/15/23	K. Goldman	Address listing of J Poulos as a witness; research and prepare for hearing.	2.80	1,750.00
08/15/23	S. Gallagher	Review and circulate parties witness lists; multiple emails with client regarding same; confer with K. Goldman on objections to witnesses	1.10	764.50
08/16/23	K. Goldman	Research affidavits used by Dominion opposition in other litigation	2.10	1,312.50
08/17/23	K. Goldman	Draft motion to strike Fulton witness disclosure of J Poulos.	2.30	1,437.50
08/17/23	S. Gallagher	Work on prehearing applications; multiple emails with client; review of party submissions	1.10	764.50

Date	Timekeeper	Narrative	Hours	Amount
08/18/23	K. Goldman	Draft edits and discussion related to Motion to Quash; review of Secretary's filings	2.40	1,500.00
08/18/23	S. Gallagher	Receipt and review of all prehearing applications; call with counsel regarding same	1.20	834.00
08/21/23	K. Goldman	Review of Orders and filings; research R. Newman; Draft Objection to Pro Hac.	4.20	2,625.00
08/21/23	S. Gallagher	Review of court orders; call with counsel; emails with client regarding status	0.80	556.00
08/22/23	K. Goldman	Hearing preparations; conferences and drafting filings.	2.50	1,562.50
08/22/23	S. Gallagher	Continued attention to prehearing matters; emails with client regarding same	0.80	556.00
08/23/23	K. Goldman	Prepare for and attend status conference; review of filings; meeting with S. Gallagher re: hearing strategy.	2.30	1,437.50
08/23/23	S. Gallagher	Prepare for and attend status conference; review and circulate court orders; work regarding same	2.30	1,598.50
08/24/23	K. Goldman	Strategy communications with in-house counsel; draft opposition to potential notice to attend related to J. Poulos; hearing preparation.	3.60	2,250.00
08/24/23	S. Gallagher	Review, circulate and summarize memorandum and orders; conference with K. Goldman regarding denial of motion in limine; call with client regarding same	3.00	2,085.00
08/25/23	K. Goldman	Draft objection to J. Polous appearance; review of filings; confer with S. Gallagher	3.20	2,000.00
08/25/23	S. Gallagher	Review of filings; emails with client; multiple calls with K. Goldman; file objection to witness attendance	1.40	973.00
08/27/23	K. Goldman	Hearing preparation; travel to Harrisburg.	6.00	3,750.00
08/28/23	K. Goldman	Prepare for; attend hearing on escrow agent; return travel to Pittsburgh.	15.00	9,375.00
08/28/23	S. Gallagher	Review and respond to emergency filings; communications with client regarding same; attention to hearing matters	2.00	1,390.00
08/29/23	K. Goldman	Hearing prep; review of filings and orders and travel to Harrisburg.	6.40	4,000.00
08/29/23	S. Gallagher	Review and circulate emergency applications; draft and file answers to same	0.40	278.00
08/30/23	K. Goldman	Hearing attendance; preparation; client communications.	12.00	7,500.00
08/30/23	S. Gallagher	Attention to hearing related matters; multiple calls with counsel	2.80	1,946.00
08/31/23	K. Goldman	Hearing preparation; conferences with client team; hearing attendance; return travel; confer with S. Gallagher re: follow-up and next steps.	15.00	9,375.00
09/06/23	K. Goldman	Review County filing.	1.20	750.00

Date	Timekeeper	Narrative	Hours	Amount
09/15/23	K. Goldman	Review of Special Masters Opinion and conference with S Gallagher.	1.10	687.50
09/20/23	S. Gallagher	Review opinion; emails with client regarding same	0.60	417.00
09/29/23	K. Goldman	Multiple calls and communications with client; edits to draft order on ProV&V and motion to continue.	2.30	1,437.50
10/02/23	K. Goldman	Draft email update to client; review Court order; confer with counsel.	0.70	437.50
10/02/23	S. Gallagher	Review of equipment issue; confer with K. Goldman	0.60	417.00
10/03/23	K. Goldman	Calls with client and call with counsel re escrow.	0.80	500.00
10/10/23	K. Goldman	Call with counsel for the secretary; review of draft escrow order; prepare declaration.	1.80	1,125.00
10/18/23	K. Goldman	Review of Fulton Co. Answer to escrow order.	0.60	375.00
10/26/23	K. Goldman	Review Fulton Statement;	0.40	250.00
10/27/23	K. Goldman	Review final appointment order; communications with client and S Gallagher.	0.40	250.00
11/01/23	S. Gallagher	Call with client; attention to Fulton County status	0.90	625.50
11/08/23	K. Goldman	Review of Fulton County Council minutes.	0.40	250.00
11/27/23	K. Goldman	Communications with client re: transfer mechanics; review of petition for the same.	1.40	875.00
11/28/23	K. Goldman	Communications with client re: transfer of machines.	0.30	187.50
11/29/23	K. Goldman	Communications with counsel re: coordination of transfer	0.50	312.50
12/06/23	K. Goldman	Review communications from County counsel	0.40	250.00
12/21/23	K. Goldman	Conference with counsel.	0.60	375.00
12/29/23	K. Goldman	Communications with counsel.	0.30	187.50
01/03/24	K. Goldman	Review communications re: Fulton Co.; review minutes of Commissioner meetings; review counsel communications and confer with S Gallagher re: the forgoing.	1.20	750.00
01/04/24	S. Gallagher	Attention to Petitioners request for an extension and related issues; multiple calls and emails with client	1.00	735.00
01/05/24	S. Gallagher	Call with counsel regarding transfer date and related issues; review of Petitioners request for an extension of transfer date; attention to same; calls and emails with client regarding same	1.10	808.50
01/08/24	S. Gallagher	Review of County filings; circulate and summarize same; attention to County conduct	1.20	882.00
01/08/24	B. Lucas	Review file records to begin preparation of emergency application to enforce order and for contempt	1.30	734.50
01/09/24	K. Goldman	Calls with S Gallagher and client; confer with B Lucas re: argument for motion for injunctive relief.	0.80	500.00
01/09/24	S. Gallagher	Review and circulate court order; work on application for sanctions	2.30	1,690.50

Date	Timekeeper	Narrative	Hours	Amount
01/09/24	B. Lucas	Draft Emergency Application to Enforce Supreme Court Order and for Hearing on Contempt	4.80	2,712.00
01/09/24	B. Lucas	Research to prepare Emergency Application to Enforce Supreme Court Order and for Hearing on Contempt	2.60	1,469.00
01/09/24	B. Lucas	Finalize and file Emergency Application to Enforce Supreme Court Order and for Hearing on Contempt	0.40	226.00
01/10/24	K. Goldman	Review of Supreme Court Order relative to collection of sanctions; strategy session with S. Gallagher.	1.30	812.50
01/10/24	B. Lucas	Review court orders regarding emergency application for enforcement of supreme court order; draft emails regarding same; calls with S. Gallagher regarding same	0.60	339.00
01/11/24	K. Goldman	Prepare for collection of machines; research and news reports; strategy and call with S. Gallagher.	3.20	2,000.00
01/12/24	K. Goldman	Communications with counsel re: escrow of the equipment.	0.80	500.00
01/16/24	S. Gallagher	Review of status report, docket and correspondence concerning transfer date; emails with client regarding same	0.50	367.50
01/19/24	K. Goldman	Attend collection of machines by Pro V&V; calls with client regarding same	9.50	5,937.50
01/19/24	S. Gallagher	Travel to, from and attend transfer of machines	9.00	6,615.00
01/19/24	B. Lucas	Obtain and review records regarding voting equipment in possession of County; calls and emails with S. Gallagher regarding same	1.10	621.50
01/20/24	K. Goldman	Review inventory from Pro V&V	0.40	250.00
01/22/24	K. Goldman	Review of Response to Extend by Fulton Co.	0.60	375.00
01/25/24	S. Gallagher	Receipt and review of County's answer to enforce supreme court order; receipt and review of Secretary's joinder in motion to enforce supreme court order; review docket; provide status update to client	1.20	882.00
02/12/24	S. Gallagher	Work regarding status report	0.80	588.00
02/14/24	K. Goldman	Draft status report	1.80	1,125.00
02/15/24	S. Gallagher	Review and comment of status report	0.20	147.00
02/16/24	S. Gallagher	Review of secretary filing; circulate and summarize same and status report; work on amended filing	1.70	1,249.50
02/16/24	B. Lucas	Begin to prepare renewed Bill of Costs; review records related to same	1.40	791.00
02/16/24	B. Lucas	Revise, finalize and file Status Report; review Secretary's Renewed Application for Costs	1.20	678.00
02/22/24	K. Goldman	Review secretary's fee petition	0.90	562.50
03/05/24	B. Lucas	Draft procedural and factual background Section of First Supplemental Bill of Costs; begin to draft argument for same	3.10	1,751.50

DOMINION VOTING
RE: FULTON COUNTY
0089472-000005

Page 7
March 15, 2024

Date	Timekeeper	Narrative	Hours	Amount
03/11/24	S. Gallagher	Attention to fee petition	0.20	147.00
03/11/24	B. Lucas	Review fee records and prepare two affidavits for Supplemental Bill of Costs	1.10	621.50
03/13/24	B. Lucas	Continue to draft First Supplemental Bill of Costs	1.30	734.50
03/14/24	B. Lucas	Draft and finalize first draft of First Supplemental Bill of Costs and affidavits for same	3.30	1,864.50
Total Hours			199.90	
Total Fees				\$127,114.50

DESCRIPTION OF COSTS

	Description	Amount
08/30/23	Transcript of Hearing	1,365.95
08/30/23	Commonwealth Court Hearing	978.35
08/31/23	Transcript of Hearing	1,063.85
Total Costs		\$3,408.15

Amount Due This Invoice:	\$130,522.65
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DOMINION VOTING
RE: FULTON COUNTY
0089472-000005

Page 8
March 15, 2024

TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
B. Lucas	Counsel	22.20	565.00	12,543.00
B. Lucas	Counsel	8.50	525.00	4,462.50
S. Gallagher	Partner	19.20	735.00	14,112.00
S. Gallagher	Partner	32.10	695.00	22,309.50
K. Goldman	Partner	117.90	625.00	73,687.50
Total		199.90		127,114.50

Exhibit 2

Sargent's Court Reporting Service
210 Main Street
Johnstown, PA 15901
Phone: 814-536-8908 Fax: 814-539-7579

Kathleen Jones Goldman, Esquire
Buchanan Ingersoll & Rooney, PC - Pittsburgh
Union Trust Building
501 Grant Street
Suite 200
Pittsburgh, PA 15219-4413

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
1746208	8/31/2023	262717
Job Date	Case No.	
8/30/2023	277 MD 2021 and 3 MAP 2022	
Case Name		
Fulton County vs. Secretary of the Commonwealth		
Payment Terms		

Certified Transcript
Hearing

1,365.95
TOTAL DUE >>> \$1,365.95

ACCEPTING VISA, MASTERCARD AND AMERICAN EXPRESS

*Submitted on
9-11-23*

Tax ID: 25-1794603

Please detach bottom portion and return with payment.

Kathleen Jones Goldman, Esquire
Buchanan Ingersoll & Rooney, PC - Pittsburgh
Union Trust Building
501 Grant Street
Suite 200
Pittsburgh, PA 15219-4413

Job No. : 262717 BU ID HARR-CVIL
Case No. : 277 MD 2021 and 3 MAP 2022
Case Name : Fulton County vs. Secretary of the
Commonwealth
Invoice No. : 1746208 Invoice Date : 8/31/2023
Total Due : \$1,365.95

Remit To: **Erie Civil**

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

Sargent's Court Reporting Service
210 Main Street
Johnstown, PA 15901
Phone: 814-536-8908 Fax: 814-539-7579

Kathleen Jones Goldman, Esquire
Buchanan Ingersoll & Rooney, PC - Pittsburgh
Union Trust Building
501 Grant Street
Suite 200
Pittsburgh, PA 15219-4413

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
1746918	9/5/2023	262718
Job Date	Case No.	
8/31/2023	277 MD 2021 and 3 MAP 2022	
Case Name		
Fulton County vs. Secretary of the Commonwealth		
Payment Terms		

Certified Transcript
Hearing

1,063.85
TOTAL DUE >>> \$1,063.85

ACCEPTING VISA, MASTERCARD AND AMERICAN EXPRESS

Submitted
on 9-11-23

Tax ID: 25-1794603

Please detach bottom portion and return with payment.

Kathleen Jones Goldman, Esquire
Buchanan Ingersoll & Rooney, PC - Pittsburgh
Union Trust Building
501 Grant Street
Suite 200
Pittsburgh, PA 15219-4413

Job No. : 262718 BU ID : HARR-CONTR
Case No. : 277 MD 2021 and 3 MAP 2022
Case Name : Fulton County vs. Secretary of the
Commonwealth
Invoice No. : 1746918 Invoice Date : 9/5/2023
Total Due : \$1,063.85

Remit To: **Sargent's Court Reporting, Inc. - Main**
210 Main Street
Johnstown, PA 15901

PAYMENT WITH CREDIT CARD		AMEX	MasterCard	VISA			
Cardholder's Name:							
Card Number:							
Exp. Date:		Phone#:					
Billing Address:							
Zip:		Card Security Code:					
Amount to Charge:							
Cardholder's Signature:							
Email:							

Sargent's Court Reporting Service
210 Main Street
Johnstown, PA 15901
Phone: 814-536-8908 Fax: 814-539-7579

Kathleen Jones Goldman, Esquire
Buchanan Ingersoll & Rooney, PC - Pittsburgh
Union Trust Building
501 Grant Street
Suite 200
Pittsburgh, PA 15219-4413

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
1745819	8/30/2023	262716
Job Date	Case No.	
8/28/2023	277 MD 2021 and 3 MAP 2022	
Case Name		
Fulton County vs. Secretary of the Commonwealth		
Payment Terms		

Certified Transcript
Commonwealth Court Hearing

	978.35
TOTAL DUE >>>	\$978.35

ACCEPTING VISA, MASTERCARD AND AMERICAN EXPRESS

Exhibit B

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.)	
)	
Intervenor.)	

AFFIDAVIT OF KATHLEEN JONES GOLDMAN

I, Kathleen Jones Goldman, hereby state and affirm the following:

1. I am a Shareholder at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and I am an attorney licensed to practice in Pennsylvania, West Virginia and Ohio.
2. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.
3. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.

4. I received a J.D. degree from West Virginia University College of Law in 1995. I also received a B.A. degree from Wheaton College in Norton, Massachusetts in 1992.

5. I have actively practiced law in the Commonwealth of Pennsylvania focusing on various complex litigation matters since September of 2006, when I began my employment with the Firm.

6. I have practiced law for over 26 years in numerous jurisdictions throughout the United States of America. I have represented clients before numerous state and federal courts and I have extensive appellate experience, notably obtaining favorable decisions for my clients in *Norfolk Southern Railway Co v. Pittsburgh & West Virginia Railroad*, No. 16-1195 (3d Cir. 2017) and *Mallet & Co., Inc. v. Lacayo*, No. 20-3584 (3d Cir. 2021). I have been selected for inclusion in The Best Lawyers in America consistently since 2019 in the Commercial Litigation category and I was named to the BTI Client Service All-Stars 2017 list, an award based solely on unprompted feedback from corporate counsel at large and Fortune 1000 organizations.

7. I have assisted Mr. Gallagher and the rest of the Buchanan team in representing Dominion in the above-captioned action since December 2021.


8. As reflected in the Firm billing records attached to the accompanying Affidavit of Shawn N. Gallagher, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I prepared

for, attended and participated in the hearings during the Impoundment Proceedings, participated in negotiations with the Secretary's and Petitioners' counsel regarding impoundment procedures, drafted status reports, and traveled to and attended the January 19, 2024 transfer of Dominion's Voting Equipment to Pro V&V.

9. During the pertinent period, my hourly rate ranged from \$520 to \$715 per hour, depending on the nature and locale of the litigation. For my time in this matter, the firm charged Dominion \$625 an hour throughout 2023 and 2024.

10. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: March 19, 2024



Kathleen Jones Goldman

Exhibit C

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COUNTY OF FULTON, <i>et al.</i> ,)	
)	
Petitioners/Appellees,)	
)	
v.)	No. 277 MD 2021
)	No. 3 MAP 2022
SECRETARY OF THE COMMONWEALTH,)	
)	
Respondent/Appellant,)	
)	
and)	
)	
DOMINION VOTING SYSTEMS, INC.)	
)	
Intervenor.)	

AFFIDAVIT OF BRENDAN P. LUCAS

I, Brendan P. Lucas, hereby state and affirm the following:

1. I am a Counsel at the law firm of Buchanan Ingersoll & Rooney PC (the “Firm”) and an attorney licensed to practice in Pennsylvania. The Firm represents Intervenor, Dominion Voting Systems, Inc. (“Dominion”) in the above-captioned action.

2. I submit this Affidavit in support of the Dominion’s Bill of Costs and Related Fees and Expenses made and filed pursuant to the Special Master’s Order dated April 28, 2023. The facts set forth herein are based on my personal knowledge.

3. I received a J.D. degree from the University of Pittsburgh Law School in November 2012. I also received a B.A. degree from the University of Virginia in

May 2008. I have actively practiced law, focusing on various complex litigation, energy and administrative law matters, since June 2014, when I began my employment at the Firm.

4. I have been named to the Super Lawyers Pennsylvania Rising Stars since 2019 and I have extensive appellate experience, notably obtaining favorable decisions for my clients in *Municipality of Mt. Lebanon v. Gillen*, 151 A.3d 722 (Pa. Cmwlth. 2016), *Li Lan An v. Zoning Hearing Bd. of O'Hara Twp.*, 776 C.D. 2019, 2020 WL 2394268 (Pa. Cmwlth. May 12, 2020) and *Ctr. St. Luxury Apartments, LLC v. Town of Bloomsburg Zoning Hearing Bd.*, 290 A.3d 1281 (Pa. Cmwlth. 2022).

5. I have assisted Mr. Gallagher with representing Dominion in the above-captioned action since December 2021.

6. As reflected in the Firm billing records attached to the accompanying Affidavit of Shawn N. Gallagher, I performed work in connection with the various filings and hearings necessary in order to obtain relief from the courts to prevent unauthorized access to Dominion's Voting Equipment. Among other things, I prepared draft pleadings of claims against County of Fulton to protect Dominion's commercial and contract rights; assisted in drafting the Emergency Application to Intervene in the above-captioned case before the Commonwealth Court; assisted in the preparation for hearing on Application to Intervene; assisted in drafting the

Application for Stay Pending Appeal of the denial of the Emergency Application to Intervene; assisted in drafting the Brief of Appellant in Dominion's appeal of the denial of the Emergency Application to Intervene; and assisted in drafting various filings for the contempt proceedings in this matter, including the Application for Costs and Fees filed with the Supreme Court.

After Dominion submitted its Initial Bill of Costs, I also drafted various pleadings and other documents related to the Impoundment Proceedings. In addition, I drafted the Emergency Application to Enforce Supreme Court Order and for Hearing to Hold Petitioners in Contempt.

7. During the pertinent period, my hourly rate ranged from \$525 to \$585 per hour, depending on the nature and locale of the litigation. For my time in this matter, the firm charged Dominion \$525 an hour during 2023, increasing that rate to \$565 an hour in 2024.

8. The facts set forth herein are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: March 19, 2024



Brendan P. Lucas

CERTIFICATE OF COMPLIANCE WITH PUBLIC ACCESS POLICY

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted By: Shawn N. Gallagher

Signature: /s/Shawn Gallagher

PA I.D. No. 88524

Dated: March 19, 2024