

Exhibit 4

LuckyGunner Time Entries Containing Non-Privileged Redacted Communications
From Aff. of J. Vogts, Dkt. No. 48-2

<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Time</u>	<u>Total Cost</u>
9/16/14	AAL	Telephone conference with client regarding lawsuit; analyze potential defenses; review amended complaint; analyze Colorado law on negligent entrustment; analyze issues related to removal to federal court; phone conference with --REDACTED-- regarding preliminary analysis of plaintiffs' claims	4.8	\$1,176.00
9/17/14	AAL	Analyze arguments for removal including monetary value of injunctive relief, impact of original complaint and arguments to defeat motion to remand; conference with client regarding general litigation strategy; review draft litigation hold; edit and revise same; emails with --REDACTED-- regarding allegations of complaint and litigation hold; analyze arguments to dismiss nuance claim; analyze original complaint; email to client regarding same	6.2	\$1,519.00
9/17/14	JBV	E-mail exchanges with counsel regarding the case; conference with Mr. Lothson regarding removal and dismissal strategies; conference with Mr. Vanderporten regarding research topics; research regarding --REDACTED-- to seek injunctive relief and ability to plead irreparable harm; further analysis of amended complaint allegations; prepare outline of motion to dismiss	5.4	\$2,106.00
9/18/14	AAL	Research and analyze Tenth Circuit and District of Colorado law on impact of original complaint with non-diverse defendant; review original complaint's allegations including class action allegations, allegations against shooter, and requested relief; analyze additional issues related to establishing federal diversity jurisdiction; analyze all pleadings obtained from state court action filed to date; phone conference with --REDACTED-- regarding strategy for removal, use of affidavit regarding jurisdictional amount threshold and other related issues; phone conference with co-defendant BTP Arms regarding status of case and removal consent; phone conference with Chris Russell of co-defendant regarding status of case and removal consent; phone conference with counsel for Sportsman's Guide regarding removal to federal court and status of case	6.3	\$1,543.50
9/22/14	AAL	Analyze arguments for dismissal of injunctive relief allegations; conference with Mr. Vogts regarding same; phone conference with attorney for Sportsman's Guide on strategy for removal and dismissal; follow up emails with attorney for Sportsman's Guide regarding pertinent issues; conference with --REDACTED-- regarding arguments for dismissal and preparation of material in support of removal; conference with attorney for BTP and OA; conference with --REDACTED-- and --REDACTED-- regarding co-defendant; supplement and revise affidavit in support of removal; revise notice of removal; review Tenth Circuit case law on removal issues and motions to dismiss	6.9	\$1,690.50
9/23/14	AAL	Review case law on requirements of consent of co-defendants; email to counsel for Sportsman's Guide regarding arguments for dismissal; supplement and revise declaration of JF in support of removal; conference with --REDACTED-- regarding co-defendant Chris Russel and strategy for removal consent; draft consent to removal for Chris Russel; conference with Mr. Russell regarding removal and related issues; email to Mr. Russell regarding consent form; conference with attorney for Sportsman's Guide regarding grounds for removal; review Colorado statute on attorney's fees; supplement notice of removal with statements of JF from declaration and	4.6	\$1,127.00

		record citations; review local rules on removal procedure and practice and motion to dismiss procedure		
10/1/14	JBV	Prepare memorandum in support of motion to dismiss (introduction, background, lack of special relationship, and proximate cause); conference with Mr. Lothson regarding removal and dismissal issues; analysis of removal issues; research regarding Colorado state court --REDACTED-- requirements	8.2	\$3,198.00
10/8/14	AAL	Research additional case law on federal question jurisdiction; supplement and revise statutory interpretation argument for motion to dismiss; analyze entire draft motion to dismiss; supplement legal standards section of motion to dismiss; review terms of sale; draft footnote and related argument on terms; supplement argument on prosecution of public nuisance by non-government actor; conference with Mr. Vogts regarding status; conference with --REDACTED-- on status; review financial information for declaration in support of removal; emails to and from local counsel regarding status of removal, motion to dismiss and general litigation strategy	6.5	\$1,592.50
10/15/14	AAL	Review standing orders of potential federal judge assignments; draft short motion for extension of page limitation; edit and revise same; emails with local counsel in preparation to file notice of removal and related papers; review final client comments to motion to dismiss; review additional Colorado duty law and analysis of special relationship; finalize state court notice regarding action removed to federal court; final review and edit of motion to dismiss in preparation to finalize and e-file; review issues related to terms of sale; emails to client regarding same; conference with --REDACTED-- regarding status; conference with counsel for SG regarding removal and motion to dismiss	5.7	\$1,396.50
10/16/14	AAL	Final review of Colorado law on negligent entrustment and proximate cause; final edit of motion to dismiss in preparation to e-file; emails with counsel for co-defendants regarding same; edit and revise corporate disclosure statement in preparation to e-file per client comments; finalize notice of removal; finalize exhibits to notice of removal; finalize motion for extension of page limitation; conference with Mr. Vogts regarding nuisance Colorado duty law; e-file notice of removal and related papers; finalize state court notice regarding removal; email to local counsel regarding instructions for state court notice; email to co-defendant's counsel regarding removal papers; e-file AAL's appearance; e-file motion to dismiss, corporate disclosure statement and motion for extension of page limitation; conference with --REDACTED-- on status; review arguments of co-defendant.	6.8	\$1,666.00
11/3/14	AAL	Telephone conference with counsel for SG regarding briefing schedule on motion to dismiss; review emails from plaintiff's counsel regarding same; review Judge Matsch's procedure on extensions of time; phone conference with --REDACTED-- regarding status	0.5	\$122.50
11/12/14	AAL	Analyze additional issues related to privilege; phone conference with --REDACTED-- regarding same; review emails to and from local counsel	0.8	\$196.00
12/3/14	AAL	Conference with --REDACTED-- regarding status; review docket report regarding plaintiffs' response to motions to dismiss and notice of constitutional challenge; review procedure for notice of constitutional challenges	0.9	\$220.50
12/4/14	AAL	Analyze plaintiffs' response in opposition to motion to dismiss; review case law regarding constitutionality of Colorado and federal immunity statutes; review abstention doctrine regarding state constitutional challenge; conference with --REDACTED-- regarding status; analyze arguments for dismissal that plaintiff did not address in response brief; conference with JBV regarding same	5.2	\$1,274.00

12/12/14	AAL	Review notice filed by DOJ; email to client regarding same; analyze case law on implied preemption; review other PLCAA cases to determine whether preemption was raised; analyze case law to support argument for due process and fifth amendment analysis; draft analysis of constitutional issues for use in reply brief; supplement outline of reply brief on constitutional issues for use in reply brief; supplement outline of reply brief on constitutional issues; conference with --REDACTED-- regarding status; I review case law on constitutional avoidance doctrine; draft analysis of same for use in reply brief; research additional case law on separation of powers doctrine; review plaintiffs' citation to legislative history.	7.3	\$1,788.50
1/6/15	AAL	Supplement implied preemption argument section of reply brief; supplement section of reply brief regarding scope of PLCAA exceptions; review additional Colorado case law on duty and special relationship; conference with local counsel regarding same; revise draft of reply for client review and comment; review issues related --REDACTED-- to client; review statute related to same; conference with Mr. Vogts on status	6.4	\$1,568.00
1/7/15	AAL	Telephone conference with --REDACTED-- and OA regarding --REDACTED-- matter; further supplement and revise proximate cause arguments; draft additional footnote to support Colorado duty law; edit and revise equal protection citations and analysis of Colorado immunity statute; conference with Mr. Vogts regarding Colorado law	3.7	\$906.50
1/26/15	AAL	Analyze status of issues raised by --REDACTED-- edit email regarding same; email to client regarding discovery and DA	0.7	\$171.50
1/28/15	AAL	Review email from DOJ attorney regarding intervention and constitutionality; review multiple emails for other parties to the litigation regarding consent to intervene; conference with --REDACTED-- regarding status of intervention and briefing; analyze abstention issues	0.8	\$196.00
2/3/15	AAL	Review cases relied on in petition to intervene and related briefs; conference with --REDACTED-- regarding constitutional arguments presented by DOJ and procedural issues related to additional briefing and appellate issues; review prior arguments on constitutionality	1.1	\$269.50
2/4/15	AAL	Telephone conference with SG's counsel regarding pending hearing; review emails regarding potential dates and correspondence with court clerk; conference with --REDACTED-- regarding oral argument; analyze issues related to procedure for oral argument; conference with Mr. Vogts on same	0.7	\$171.50
2/9/15	AAL	Conference with JBV regarding status; phone conference with --REDACTED-- regarding status of briefing, oral argument and related issues	0.5	\$122.50
2/17/15	AAL	Telephone conference with --REDACTED-- regarding status and impact of related actions; review emails regarding same; conference with JBV on oral argument	0.4	\$98.00
2/25/15	AAL	Telephone conference with co-defendant's counsel on status; analyze issues related to Rule 55(a) motion for default; prepare notes on abstention from entering default judgment in multi-defendant lawsuit; review DOJ's motion to substitute counsel; phone conference with --REDACTED-- regarding status	1.6	\$392.00
3/9/15	AAL	Conference with --REDACTED-- regarding status; conference with JBV regarding strategy	0.4	\$98.00
3/11/15	AAL	Review online materials posted by plaintiffs, Brady Center and related attorneys in preparation for oral argument; emails with --REDACTED-- regarding same; analyze public nuisance standing issues and arguments related to same; conference with Mr. Vogts on same	1.2	\$294.00
3/12/15	AAL	Research case law from all jurisdictions on mootness doctrine and common law public nuisance claims; research update on PLCAA and immunity case law; conference with JBV regarding same; conference with counsel for co-defendant regarding same; emails regarding summary of analysis; conference with --REDACTED-- regarding oral argument preparation.	3.3	\$1,287.00
		Total:	96.9	\$ 26,191.00