

## EXHIBIT 16

## Wollschlaeger v. Farmer

## ENTRIES INSUFFICIENTLY DETAILED

Date	Timekeeper	Legal Services Rendered	Hours	Objections	Notes
4/28/2011	Jonathon Lowy	Review and analyze legislation (.25); preliminary research and legal analysis on litigation (.5); tel. call with K. Crumley, Florida counsel, re Fla. legislation and litigation strategy (.25)	0.25	detail (Crumley not sufficiently identified to determine his role in case; subject of research not described)	
5/4/2011	Jonathon Lowy	Conference call with clients re: litigation strategy (.5); Review materials including pediatricians' policies and clinical guidance on firearms prevention to prepare complaint (.25)	0.75	detail (clients not identified); duplicative of Ripa 5/5, 6, 9, 10	
5/11/2011	Goetz, Mariel	Reviewed background materials on the case and the history of the law	0.50	duplicative of Vice 5/9; detail (background materials not described)	
5/13/2011	Jonathon Lowy	Tel. Con. With Dennis Kainen, Florida attorney re suit and Florida law and procedure, Florida law and legal research for filing	0.50	need (Kainen contact not necessary); detail: (subject of research not given; Florida law not specifically described)	
5/16/2011	Dina Shand	Compiled social science on guns in the home from Brady and e-mail sources	1.00	need (social science not necessary to make facial challenge) detail (email sources not described)	
5/16/2011	Goetz, Mariel	Background reading on statute and analysis of provisions of statute for purposes of physician interviews	1.00	detail (background reading not specific)	
5/17/2011	Jonathon Lowy	Work on declarations from clients for PI motion	0.75	detail (clients not identified), duplicative of Vice)	
5/17/2011	Daniel Vice	Work on declarations from plaintiffs for PI motion	1.25	detail (clients not identified) duplicative of Lowy	
5/18/2011	Daniel Vice	Strategy discussion and legal research concerning client declarations	1.50	detail (person involved in discussion not identified; subject of legal research not described)	confer
5/23/2011	Daniel Vice	Review and analyze legislation (0.5), review declarations for motion (0.5), communications with co-counsel concerning declarations (0.25), research concerning physician obligations and guns re: application of legislation (1.0)	0.75	detail (declarants not identified)	confer
5/23/2011	Hallward-Driemeier, Douglas	Review research prepared by Brady Center.	0.50	detail (subject of research not described)	

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5/23/2011	Lewis, Julia	Interview Dr. Wollschlaeger regarding his views of gun safety counseling and HB 155 (2.0) and review notes and declarations from interviews conducted by Brady interns (2.0).	2.00	detail (declarants not identified)	
5/24/2011	Jonathon Lowy	Review, edit draft complaint and declarations; emails with co-counsel, staff re work on case and research analysis	2.25	detail (declarants not identified), block, duplicative of Hallward 5/26, 25, 19	confer
5/24/2011	Daniel Vice	Review, edit draft complaint and declarations	2.00	detail (declarants not identified), duplicative of Hallward 5/26, 25, 19	
5/24/2011	Lewis, Julia	Draft summaries of 5 witness interviews conducted by Brady.	5.00	detail (witnesses not identified)	
5/25/2011	Manheim, Bruce S Jr	Review papers (.75); draft letter to governor (.5); follow up email correspondence (.25)	0.75	detail (papers not identified; subject of correspondence not described)	confer
5/27/2011	Dewar, Elizabeth N.	Research (3.5) and e-mails to/from D.Hallward-Driemeier, B.Manheim, S. Lemmon, and A.Ripa regarding standing issues and also preliminary injunction standards (1.25).	3.00	detail (research not described)	confer
5/30/2011	Hal Lucas	Telephonic conference with B. Manheim and E. Mullins re: new matter.	0.40	detail (new matter not described)	confer
6/2/2011	Lewis, Julia	Interview with Dr. Cava regarding his views on HB 155 (2.0); send follow-up emails to physician (1.0)	1.00	need (Cava views not relevant, not used), detail (physician not identified)	
6/5/2011	Edward Mullins	Work on finalizing complaint (.2); work on issues with respect to plaintiffs and filing strategy (.4)	0.40	detail (issues with respect to plaintiffs not described)	
6/6/2011	Aida Rodriguez	Research correct names and addresses of State of Florida officials to be served (1.0); research names and addresses of Florida Board of Medicine members (1.0); locate process server in Tallahassee with experience serving government officials (0.5); telephone conference with process server (0.4); prepare letter to process server enclosing fee and summonses to be served with specific instructions regarding same (1.0); confer with E. Mullins on tasks (0.5).	0.50	detail (tasks not described); clerical (locate process server)	confer

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6/6/2011	Edward Mullins	Work on final preparations for filing (.3); edit and revise final draft complaint; correspond with clients on same (.4); correspond with legal team on filing requirements (.3); work on service issues (.1); provide law on privilege (.3); conference with co-counsel regarding judge, procedures (.6); investigate service procedures (.3); conference with counsel regarding same (.4); numerous calls and conferences to general counsel offices of defendants (1.0); update E. Dewar on same (.7); task A. Rodriguez on project on analyzing location of administrative authority (.2); task E. Davila on service projects (.1); correspond with B. Manheim on strategy (.3); correspond with team on amendment strategy (.2); edit and revise certificate of interested persons (.2); send draft of same to team (.1)	0.80	duplicative of Hallward (revise and edit complaint), clerical (re service issues and procedures), need (law of privilege, irrelevant issue), detail (procedures), detail (service projects)	confer
6/6/2011	Hallward-Driemeier, Douglas	Revise draft complaint and declarations.	4.00	detail (declarants not identified)	
6/6/2011	Goetz, Mariel	Review and comment on draft declarations and related documents.	7.50	detail (declarants and related documents not identified)	
6/6/2011	Manheim, Bruce S Jr	Email correspondence with team (.25) and review of declarations and complaint (.75).	1.00	detail (subject of correspondence not described; declarants not identified); duplicative of Hallward 6/5	confer
6/7/2011	Ripa, Augustine	Coordinate with team on plaintiffs, declarations (.25); legal research re: preliminary injunction (2.75)	3.00	detail (declarants not identified; research not described)	confer
6/8/2011	Ripa, Augustine	Legal research re: preliminary injunction	2.00	detail (research not described)	
6/9/2011	Hallward-Driemeier, Douglas	Correspondence with clients regarding declarations in support of preliminary injunction.	0.50	detail (declarants not identified)	
6/10/2011	Jonathon Lowy	Discussed and reviewed research on physician review board complaint procedure and complaint forms (1.0); Communications with co-counsel and clients re litigation strategy and research (0.25)	1.00	detail (discussed with whom?)	

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Date	Timekeeper	Legal Services Rendered	Hours	Objections	Notes
6/10/2011	Edward Mullins	Review status of service (.1); review rules on service after summons (.1); review reports on pending Supreme Court cases (.2); correspond with Ropes on various issues in the case (.5); conference with Ropes on strategy (.5); task A. Rodriguez on legislative history (.2); review legislative history of bills (.3); correspond with E. Dewar on strategy (.2); send procedures on Judge Cooke to team (.1)	0.20	detail (issues re SCt cases; various issues not described), duplicative of Hallward 6/16 (review legislative history)	confer
6/10/2011	Goetz, Mariel	Interview doctors and prepare declarations (5.0). Emails with team regarding status of doctors and case strategy (.5). Revise organizational declarations and emails with team regarding same in response. (3.25)	8.25	detail (declarants not identified)	confer
6/11/2011	Edward Mullins	Correspond with Ropes team on amicus (.2); correspond with A. Finley on same (.1)	0.10	detail/need (Finley not identified; link to case not clear)	confer
6/15/2011	Hallward-Driemeier, Douglas	Review of declarations.	1.00	detail (declarants not identified)	
6/15/2011	Lemmon, Scott	Reviewed studies sent by Brady center for potential use in complaint.	0.25	detail (subject of studies not identified)	
6/16/2011	Manheim, Bruce S Jr	Focus on pleadings and declarations; email correspondence with clients.	1.50	detail (focus on what pleadings and declarations and how; subject of correspondence not described)	
6/17/2011	Ripa, Augustine	Coordinate with team on declarations, captions, and other filing materials.	1.00	detail (filing materials not described)	
6/19/2011	Goetz, Mariel	Attention to physician declarations. (1.0) Emails with team regarding case. (.5)	1.50	detail (subject of emails not described; attention to declarations gives no idea what work done)	confer
6/20/2011	Edward Mullins	Correspond with B. Dewar on status of filings (.2); review status of meeting (.1); attend strategy meeting with T. Julin, Ropes firm (.9); review letter from C. Smith (.1); correspond with Ropes team on responding to NRA (.1); review recent USSC cases, correspond with Ropes team on matter of public concern law (.4)	0.40	detail (SCT cases not identified)	confer

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Date	Timekeeper	Legal Services Rendered	Hours	Objections	Notes
6/20/2011	Goetz, Mariel	Attention to physician declarations. (3.0) Emails with team regarding PI motion (1.0). Confer with R. Dugas regarding declarations. (.5) Review and comment on PI motion. (1.0)	3.00	detail (attention does not describe nature of work done); duplicative of Hallward 6/13, 14, 18, 19, 20, 21, 23 (PI review)	confer
6/20/2011	Manheim, Bruce S Jr	Review and revise memo and amended complaint (.5); additional legal research (.5).	0.50	duplicative of Hallward 6/13, 14, 18, 19, 20, 21, 23 (PI revision); detail (research not described)	
6/22/2011	Lewis, Julia	Email doctors reminding them of confidential nature of non-public information imparted to them (.5). Review D. Vice's comments on amended complaint (.5). Research case history of Jacksonville case to determine appropriateness of citation for B. Dewar. (.5)	0.50	detail/need (information about Jacksonville case insufficient to determine its connection with this one)	
6/23/2011	Edward Mullins	Correspond with E. Palmer and A. Rodriguez regarding legislative history (.2); correspond with team on finalizing motion (.2); task H. Lucas, D. Giuliano on logistics (.2); work on finalizing filing (.4)	1.00	detail (insufficient information given to determine necessity of communication to Palmer and Rodriguez)	confer
6/23/2011	Manheim, Bruce S Jr	Review draft pleadings (.75), email correspondence (.25), teleconferences re finalization of amended complaint (1.0).	2.00	detail (subject of correspondence not described; declarants not identified)	confer
6/24/2011	Daniel Vice	Review final case filings (0.5) and research case law on litigation next steps (0.75)	0.75	detail (research not described); duplicative of Lowy	
6/24/2011	Edward Mullins	Review correspondence on enlargement (.2); correspond with Ropes team on same, magistrate issue (.3); work on request for oral argument (.1); finalize filings (.2); work on proposed order (.2)	0.20	detail (correspondent not identified)	confer

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6/27/2011	Edward Mullins	Review final motion for preliminary injunction (.2); prepare for meeting with J. Vail (.1); correspond with B. Manheim regarding preliminary injunction procedures (.1); attend meeting with Governor's office (.6); review recent Supreme Court case (.1); conference with J. Vail on service, task E. Davlia (.1); work on strategy on motion to intervene (.4); conference with T. Julin on strategy (.2); review motion to intervene (.2); conference with E. Dewar on strategy (.2); review orders on briefing, scheduling (.2); conference with D. Hallward-Driemeier on strategy (.2); conference with T. Julin on amicus (.2); conference with T. Julin, D. Hallward-Driemeier on same (.2)	0.10	duplicative of Hallward 6/13, 14, 18, 19, 21, 23 (review mo/PI); detail (recent SCT case subject); duplicative of Hallward 6/27 (mo/intervene)	confer
6/27/2011	Manheim, Bruce S Jr	Email correspondence re NRA motion to intervene (.5) and telephone conference with counsel for state regarding timing and schedule of briefing in case (1.0)	0.50	detail (correspondent not identified)	confer
7/2/2011	Edward Mullins	Review correspondence on resolution by Florida Medical Association	0.20	need (FMA resolution irrelevant); detail (correspondent not identified)	confer
7/7/2011	Manheim, Bruce S Jr	Continue to review and revise brief; legal research.	1.50	detail (what brief; subject of research not described)	
7/8/2011	Edward Mullins	Review draft reply (.5); edit and revise same (1.4); send comments to B. Manheim (.1); conference with J. Lewis on filing of disc (.1); review declaration of B. Manheim (.1); revise notice of conventional filing (.1); review order denying intervention (.2); review motion to change caption (.1); work on strategy with respect to response and issues with order on intervention (.2); edit and revise latest version of reply (.4); correspond with clients on logistics (.1)	2.00	duplicative of Hallward 7/7, 8 (review/work on reply); detail (update Kanien about what and why was it necessary?; same for P. Blank, conference with Greenberg)	
7/13/2011	Jonathon Lowy	Communications with Dan V., co-counsel and clients re litigation strategy (0.5), legal analysis and research (3.5)	4.00	excessive, detail (failure to describe subject of communications with staff, cocounsel, clients and subjects of discussions, research)	

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7/14/2011	Edward Mullins	Assist amicus with transcript (.2); review transcript for memorandum (.3); work on strategy with team (.3); work on outline (.3)	0.30	need (assist amicus with transcript), detail (subject of outline); duplicative of Dewar, Lemmon,Goetz 7/14	confer
7/14/2011	Dewar, Elizabeth N.	Drafted outline of supplemental submission and necessary supplemental research necessary (4.0); worked with co-counsel and team regarding same (.75)	4.00	detail (research not described); duplicative of Goetz, Lemmon, Mullins	confer
7/14/2011	Goetz, Mariel	Phone calls with multiple doctors regarding additional anecdotes (1.0). Draft declarations. (1.0)	2.00	detail (doctors, declarants not identified)	
7/14/2011	Manheim, Bruce S Jr	Additional email correspondence with team regarding analysis.	1.00	detail (correspondent not identified)	confer
7/14/2011	Manheim, Bruce S Jr	Prepare stat analysis outline for brief; forward to team.	1.50	need; detail (subject of statistical analysis not described)	confer
7/14/2011	Manheim, Bruce S Jr	Follow up on next steps for drafting of supplemental brief; additional declarations.	1.00	detail (follow up does not describe work done)	
7/15/2011	Edward Mullins	Correspond on strategy in case	0.20	detail (correspondent not identified)	confer
7/15/2011	Goetz, Mariel	Confer with B. Dewar regarding supplemental briefing issues.	0.75	detail (issues not identified)	confer
7/16/2011	Edward Mullins	Correspond with team on evidentiary issues (.2); work on revising declaration (.1)	0.30	detail (issues not identified; declarant not identified)	confer
7/18/2011	Edward Mullins	Correspond with counsel regarding edits to amicus brief (.5); review message from CHILD and update amici team on same (.2); work on revisions to declaration (.1)	0.80	detail (declarant not identified; CHILD not described; correspondents not identified)	confer
7/19/2011	Dewar, Elizabeth N.	E-mails to/from M.Goetz, D.Hallward-Driemeier, and B.Manheim regarding additional edits to declarations.	0.25	detail (declarants not identified)	confer
7/19/2011	Goetz, Mariel	Revise multiple physician declarations (.75) and conference call with Judy Schaechter regarding declaration edits (.5). Emails with team regarding supplemental declarations and briefing issues. (.25).	1.50	detail (declarants not identified)	confer
7/20/2011	Goetz, Mariel	Emails with team regarding supplemental briefing and additional developments in case.	1.50	detail (additional developments not described)	confer
7/25/2011	Edward Mullins	Correspond with B. Manheim regarding having fact that letter not sent given to Court (.1); conference with S. Lemmon on same (.1); edit and revise declaration (.1)	0.10	need (re letter not delivered to court); detail (declarant not identified)	confer

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7/25/2011	Dewar, Elizabeth N.	Numerous emails to/from S.Lemmon regarding drafting and information for supplementary declarations regarding failure of board of medicine to advise physicians of rescind letter (.25); conferred with S.Lemmon regarding declarations (.25); emails to/from E.Mullins and S.Lemmon regarding proposed revisions to language of declaration; revised motion to supplement record. (.25)	0.50	detail (declarants not ID'd); need (board's failure to advise)	confer
7/25/2011	Hallward-Driemeier, Douglas	Revise declarations and motion for leave to file declarations regarding BOM failure to advise physicians of letter rescinding June 14 guidance.	1.00	detail (declarant not ID'd)	
7/25/2011	Lemmon, Scott	Called doctors to discuss declarations regarding Board of Medicine letters.	1.00	detail (declarants not ID'd)	
7/25/2011	Lemmon, Scott	Drafted declarations regarding Board of Medicine letters interpreting statute.	3.00	detail (declarants not ID'd)	
7/25/2011	Lemmon, Scott	Edited declarations to incorporate D. Hallward-Driemeier's comments.	0.50	detail (declarants not ID'd)	
7/25/2011	Manheim, Bruce S Jr	Email correspondence in connection with impending Preliminary Injunction Decision. (.25) Review draft supplemental papers and declarations prepared by S. Lemmon. (1.0)	1.25	detail (correspondent not identified; papers and declarants not identified)	confer
7/26/2011	Lemmon, Scott	Edited declarations, Motion for Leave to File Supplemental Declarations.	3.25	detail (declarants not ID'd)	
7/26/2011	Lemmon, Scott	Worked with plaintiffs to ensure that declarations were accurate.	0.50	detail (declarants not ID'd)	
7/28/2011	Manheim, Bruce S Jr	Email correspondence regarding case and related matters.	0.50	detail (correspondents not ID'd, issues in correspondence not described, related matters not described)	confer
7/29/2011	Manheim, Bruce S Jr	Email correspondence regarding case and Preliminary Injunction. Review state's Motion to Strike and next steps regarding Scheduling Order.	1.25	block; detail (correspondents not ID'd); duplicative of Hallward 7/27	
8/9/2011	Manheim, Bruce S Jr	Follow up on opposition to Motion to Strike; revisions to Joint Motion to Extend.	1.50	block; detail (follow up activities not described)	
10/12/2011	Manheim, Bruce S Jr	Follow up with S. Lemon regarding Summary Judgment motions.	0.50	detail (follow up does not describe work done)	confer



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10/13/2011	Manheim, Bruce S Jr	Focus on Summary Judgment Motion in case.	0.50	detail (focus does not describe issue)	
10/14/2011	Manheim, Bruce S Jr	Focus on Summary Judgment Motion issues.	0.50	detail (focus does not describe issue)	
10/17/2011	Manheim, Bruce S Jr	Follow up on timing of Summary Judgment Motions, other matters for clients.	0.50	detail (follow up does not describe work done; other matters not described)	
10/18/2011	Manheim, Bruce S Jr	Follow up on case and development of SJ motions.	0.50	detail (follow up does not describe work done)	
10/19/2011	Manheim, Bruce S Jr	Follow up with S. Lemmon regarding Summary Judgment motions.	0.50	detail (follow up does not describe work done)	
10/20/2011	Edward Mullins	Review correspondence regarding summary judgment	0.10	detail (correspondents and subjects not described)	confer
10/20/2011	Manheim, Bruce S Jr	Focus on Summary Judgment Motion and related issues.	0.50	detail (focus does not describe issue)	
10/21/2011	Manheim, Bruce S Jr	Focus on Summary Judgment motions and state response; meeting with D. Hallward-Driemeier to discuss same.	0.50	detail (focus does not describe issue)	confer
10/25/2011	Manheim, Bruce S Jr	Additional email correspondence relating to Summary Judgment Motion and filing Unopposed Extension Motion with Court.	0.50	detail (correspondents not identified)	confer
10/26/2011	Manheim, Bruce S Jr	Email correspondence and follow up with team.	0.50	detail (subject of correspondence not ID'd)	confer
10/26/2011	Manheim, Bruce S Jr	Focus on Summary Judgment motion and papers.	0.50	detail (focus does not describe issue; papers not described)	
10/28/2011	Manheim, Bruce S Jr	Review E. Mullins' edits to statement of facts; follow up with team.	0.50	detail (follow up does not describe work done)	confer
11/18/2011	Manheim, Bruce S Jr	Follow up on filing of response to state Summary Judgment Motion.	0.50	detail (follow up does not describe work done)	
11/21/2011	Manheim, Bruce S Jr	Focus on opposition to state's Motion for Summary Judgment and related papers.	0.50	detail (focus does not describe work done; related papers vague)	
11/29/2011	Lemmon, Scott	Worked with D. Hallward-Driemeier, A. Ripa, K. O'Connell regarding status of briefing, next steps.	1.75	detail (worked with vague)	confer
11/29/2011	Lemmon, Scott	Worked with A. Ripa, K. O'Connell to edit Opposition to Defendants' Motion for Summary Judgment.	7.25	detail (worked with vague)	confer

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12/5/2011	Manheim, Bruce S Jr	Follow up with S. Lemmon and K. O'Connell regarding filings.	0.75	detail (follow up vague)	
1/20/2012	Edward Mullins	- F-	0.10	detail (no task described)	
7/5/2012	Manheim, Bruce S Jr	Follow up with associate on case regarding fees petition.	0.50	detail (follow up does not describe work done)	confer
7/11/2012	O'Connell, Kelly	Discussion with B. Manheim and follow-up with E. Siegle regarding co-counsel expense reports.	0.50	detail (subject of discussion with Manheim)	confer
7/16/2012	O'Connell, Kelly	Worked with Brady counsel regarding revisions to expense reports.	0.50	detail (worked with vague)	
7/31/2012	O'Connell, Kelly	Worked with co-counsel and accounts payable to receive supporting documents and revised Bill of Costs regarding same.	1.75	detail (worked with vague)	
8/2/2012	O'Connell, Kelly	Worked with Lit Tech and Document Processing regarding exhibits to motion for fees.	0.50	clerical; detail (work with vague)	
8/9/2012	O'Connell, Kelly	Emails with local counsel and team regarding call and article about judge.	0.25	detail (call vague, article about judge irrelevant)	confer
8/16/2012	Manheim, Bruce S Jr	Follow-up correspondence with K. O'Connell re fee dispute issues	0.75	detail (follow up vague)	confer
10/1/2012	Manheim, Bruce S Jr	Focus on fee petition issues.	0.50	detail (focus on vague)	
10/4/2012	Manheim, Bruce S Jr	Focus on attorney fee petition issues; email correspondence with clients.	0.50	detail (focus on vague; issues not described)	
10/10/2012	Manheim, Bruce S Jr	Follow up with team on attorney fee petition issues.	0.50	detail (follow up vague)	confer
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