Wollschlaeger v. Farmer GENERALLY EXCESSIVE TIME

Date	Timekeeper	Legal Services Rendered	Hours	Objections	Notes
5/18/2011	Dina Shand	Researched doctor's accociations and their guidelines for gun safety	1.00	excessive, need (association plaintiffs could have provided this information)	
6/14/2011	Lewis, Julia	Research whether filling an application for preliminary injunction, motion for preliminary injunction, or temporary restraining order is the appropriate manner of seeking relief.	1.00	need, excessive (Rule 65 makes very plain that this case was not suseptible to TRO, an injunction issued without notice to defendant)	
6/28/2011	Dewar, Elizabeth N.	Read Defendants' response to the NRA's motion to intervene and emails to/from E.Mullins, D.Hallward-Driemeier, and B.Manheim regarding responding to same.	2.00	block, excessive (DE 44, defendant's response was 1 sentence long)	confer
6/28/2011	Lewis, Julia	Read Defendant's filing in support of NVRA's motion to intervene.	0.50	duplicative of Dewar 6/28, excessive (DE 44 1 sentence)	
7/6/2011	Lewis, Julia	Draft paragraph for B. Dewar to insert into reply brief regarding standing analysis. (.5) Revise standing paragraph and add additional citations according to B. Dewar's suggestions. (1.5)	2.00	excessive for drafting of two paragraphs	
7/8/2011	Lewis, Julia	Revise declaration for B. Manheim describing incidents discussed in legislative history that were cited by defendants in their opposition.	3.00	duplicative of Dewar 7/8; excessive (DE 58-1 is only 8 pgs; 2 hours already expended on the project 7/7)	check
7/8/2011	Ripa, Augustine	Research, draft, and revise response to State's motion to change the case style (3.0); confer with B.Manheim, S.Lemmon, and B.Dewar re: the same (.5)	6.50	excessive (DE 60 is only 2 pgs)	
7/9/2011	Lemmon, Scott	Drafted Reply to State's Motion for Order to Revise Styling (caption) of case.	2.00	excessive (DE 60 only 2 pgs); duplicative of Ripa 7/8, 10	

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Date	Timekeeper	Legal Services Rendered	Hours	Objections	Notes
7/11/2011	Edward Mullins	Edit and revise response to motion to change case style (.5); revise same to include letter exhibits (.2); revise response per changes of B. Manheim (.3); edit response regarding same with changes of B. Manheim, D. Hallward-Driemeier (.2); call to judge's chambers (.1); update team on same (.1); correspond with team on amici request of children's groups (.1); correspond with G. Greenberg on same (.1); conference with G. Greenberg on strategy (.1); update B. Manheim on same (.1); review order on caption (.1); review amended order denying intervention (.1); attend mock oral argument (1.5); correspond with team on Judge Cooke arguments (.2)	1.20	excessive (editing mo/change case style, DE 60 only 2 pgs), duplicative of Ripa 7/10 (mo/change case style)	caption confer
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)	
7/14/2011	Lemmon, Scott	Compared NRA Brief, Florida's brief, and Florida's oral argument transcript to determine similarities and differences in their interpretation of "harassment" and "relevant."	0.75	excessive (spent 4.3 total hours on this project)	
7/15/2011	Lemmon, Scott	Compared NRA Brief, Florida's brief, and Florida's oral argument transcript to determine similarities and differences in their interpretation of "harassment" and "relevant."	3.50	excessive	
7/16/2011	Lewis, Julia	Research cases for B. Dewar holding that the fact that a party presents different interpretations of an ambiguous statute in its legal pleadings is evidence in and of itself of the statute's vagueness.	3.00	excessive (DE 73 devotes 2 pgs to this issue; pp. 13-14; very little law cited)	
8/10/2011	Lemmon, Scott	Drafted Opposition to Defendants' Motion to Strike Plaintiffs' Supplemental Memorandum.	6.50	excessive (DE 78 only 5 pages)	
8/11/2011	Edward Mullins	Edit and revise response to motion to strike.	0.90	excessive (DE 78 only 5 pages)	

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Date	Timekeeper	Legal Services Rendered	Hours	Objections	Notes
8/11/2011	Dewar, Elizabeth N.	Read and provided comments on draft motion to strike (.25); emails to/from R.Dugas and S.Lemmon regarding further revisions to same (.25); reviewed R.Dugas edits and provided comments on same. (.25)	0.75	excessive (DE 78 only 5 pages)	confer
8/11/2011	Lemmon, Scott	Incorporated B. Manheim edits into Opposition to Defendants' Motion to Strike.	1.50	excessive (DE 78 only 5 pages)	
8/11/2011	Lemmon, Scott	Incorporated R. Dugas, E. Dewar edits into Opposition to Defendants' Motion to Strike.	2.75	excessive (DE 78 only 5 pages)	
8/11/2011	Manheim, Bruce S Jr	Review revised Opposition to Motion to Strike; telephone conference with S. Lemon regarding same.	0.75	excessive (DE 78 only 5 pages)	confer
8/12/2011	Lemmon, Scott	Edited Opposition to Motion to Strike to include E. Mullins's comments.	0.50	excessive (DE 78 only 5 pages)	
8/12/2011	Manheim, Bruce S Jr	Draft and incorporate revisions to Opposition to Motion to Strike; email correspondence regarding same.	1.50	block; excessive (DE 78 only 5 pgs)	confer
8/15/2011	Manheim, Bruce S Jr	Final review and revisions to opposition to motion to strike; file with Court. Email correspondence regarding FMA issues.	2.50	excessive (DE 78 only 5 pages)	
10/25/2011	O'Connell, Kelly	Revised motion for extension of time per team's comments; corresponded with local counsel regarding same.	0.50	excessive (DE 83's text is 1 p; this was an unopposed motion as well	
10/25/2011	O'Connell, Kelly	Drafted motion for extension of time	1.00	excessive (DE 83's substantive text is 1 p; this was an unopposed motion as well)	
8/2/2012	O'Connell, Kelly	Revised government's motion for extension of time to file fee motionand stay and worked with B. Manheim regarding same.	1.25	excessive	
8/6/2012	O'Connell, Kelly	Revised motion for extension, working with B. Manheim and E. Mullins regarding same.	0.50	excessive	
8/7/2012	O'Connell, Kelly	Revised draft motion for enlargement and stay per conversation with J. Vail and emailed draft to same.	0.50	excessive	
			51.85		