

Image Report



ABA Number 021205376
Account Number 622408984
Serial Number 189546
Amount \$34,170.18
Paid Date 08/06/2024

Front

THIS DOCUMENT HAS A COLORED BACKGROUND AND FLUORESCENT FIBERS. SEE ADDITIONAL SECURITY FEATURES ON REVERSE SIDE. MISSING A FEATURE INDICATES A COPY.

 **COUNTY OF PASSAIC**
CLEARING ACCOUNT

NOT VALID
AFTER 90 DAYS

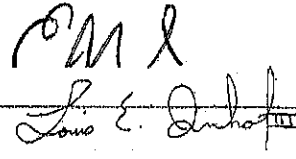
 **No. 189546**

55-537
212

DATE 07/16/24 CHECK NO. 189546 AMOUNT \$*****34,170.18

Thirty Four Thousand One Hundred Seventy AND 18/100 Dollars

TO THE ORDER OF GENOVA BURNS, LLC
494 BROAD STREET
NEWARK, NJ 07102-3230

 COUNTY TREASURER MP

CLERK TO THE BOARD MP

⑈189546⑈ ⑆021205376⑆ 622408984⑈

Back

For Deposit Only
Citizens Bank
Genova Burns LLC
1000893972

0910438712
2024-08-06

 Security Features:
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• Microprint: 200 dots per inch.
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COUNTY OF PASSAIC
COUNTY CLERK, CO OF PASSAIC
(Q) 973-881-4784
401 GRAND ST. ROOM 130
PATERSON, NJ 07505

Purchase Order

THIS NUMBER MUST APPEAR ON ALL INVOICES,
PACKING LISTS, CORRESPONDENCE, ETC.

NO. 24-04533

ORDER DATE: 06/19/24

DELIVERY DATE:

STATE CONTRACT:

F.O.B. TERMS:

VENDOR ACCT NUM:

VENDOR PHONE #: (973)533-0777

VENDOR FAX #: (973)533-1112

REQUISITION #: R4-11522

SHIP TO

VENDOR

Vendor #: 00936

GENOVA BURNS, LLC
494 BROAD STREET
NEWARK, NJ 07102-3230

PAYMENT RECORD

CHECK NO.

JUL 16 2024

DATE PAID

NOTICE: TAX EXEMPT - TAX ID: 22-6002466

QUANTITY	DESCRIPTION	ACCOUNT NO	UNIT PRICE	TOTAL
1.00	LEGAL FEES FOR THE ELECTION MATTER, KIM V HANLON ET AL. INVOICE #512134 R24-276 APRIL 9, 2024 R24-473 6/11/2024	T-20-56-880-003-801	34,170.1800	34,170.18
			TOTAL	34,170.18

CLAIMANT'S CERTIFICATION & DECLARATION

I do solemnly declare and certify under penalties; of the law that the within bill is correct in all its particulars; that the articles have been furnished or services rendered as stated therein; that no bonus has been given or received by any; person or persons within the knowledge of this claimant in connection with the above claim; that the amount therein stated is justly due and owing; and that the amount charged is a reasonable one.

VENDOR SIGN HERE

OFFICIAL POSITION

DATE

TAX ID NO. OR SOCIAL SECURITY NO.

OFFICER'S CERTIFICATION

I, having knowledge of the facts, certify that the materials and supplies have been received or the services rendered; said certification being based on signed delivery slips or other reasonable procedures.

DEPT. HEAD

DATE

VENDOR MUST SIGN CERTIFICATION STATEMENT ON THIS
VOUCHER. MAIL VOUCHER & ITEMIZED BILLS TO:

COUNTY OF PASSAIC
COUNTY CLERK, CO OF PASSAIC
(Q) 973-881-4784
401 GRAND ST. ROOM 130
PATERSON, NJ 07505

APPROVAL TO PURCHASE

DO NOT ACCEPT THIS ORDER UNLESS IT
IS SIGNED BELOW

Sherry Arvanitakis

Purchasing Agent, QPA



494 Broad Street
Newark, NJ 07102-3230
Telephone 973-533-0777
Fax 973-814-4045
Tax ID# 22-2940404
www.genovaburns.com

County of Passaic
ATTN: Danielle Ireland-Imhof, Clerk
401 Grand Street
Room 214
Paterson, NJ 07505
CountyClerkElections@passaiccountynj.org

April 30, 2024
Invoice No.: 512134
Updated 4.30.24 (MDaCosta)

*****THIS INVOICE REPLACES INVOICE NO. 512107*****
INVOICE SUMMARY

For professional services rendered and disbursements through March 24, 2024

Client Matter: 1154.215

RE: Kim v. Hanlon, et al.

Professional Services Rendered: Total Hours (3 County Representation)	603.20
1/3 Hours Billable to Passaic County Clerk	201.07
 Blended Hourly Rate Applied to Attorneys:	 \$175.00
Hourly Rate Applied to Paralegals:	\$75.00
 Fees for Professional Services Rendered	 \$ 33,810.68
Total Disbursements	<u>\$ 359.50</u>
 TOTAL DUE	 \$ 34,170.18

April 30, 2024
Invoice No.: 512134

Date	Atty	Description Of Services Rendered	Hours
2/28/24	JB	Review notices of appearance filed by multiple other attorneys.	.30
2/28/24	RDP	Confer with team on strategy; review documents.	.90
2/28/24	HC	(Kim) Call with TO and AJG regarding matter. Reviewed docket and complaint.	.80
2/28/24	HC	(Kim) Located documents for AJG. Reviewed Conforti docket for specific language for AJG. Drafted calendar of all relevant election events. Reviewed NOA's	4.20
2/28/24	HC	(Kim) obtained information on co-defendant for AJG.	.10
2/28/24	HC	(Kim) located document for AJG.	.20
2/28/24	HC	(Kim) Discussed matter with RDP.	.30
2/28/24	HC	(Kim) Reviewed complaint and noted potential counter arguments. Reviewed supporting documents and opposition to complaint.	3.10
2/29/24	AJG	Kim v Hanlon: Prepare for hearing / CMC before Judge Quraishi . 5; attend CMC .5; post hearing review with RDP, JB, HC .3; emails to proposed expert Alvarez and related follow up .5; research federal cases .3	2.10
2/29/24	JB	Telephone conference with AJG to go over conference with court; telephone conference with court and all counsel to discuss briefing schedule and OTSC: telephone conference with RDP to discuss next steps; review with HC regarding conference and next steps.	1.30
2/29/24	JB	Review additional notices of appearances on e-fling; review letter from Camden Democratic Committee regarding intervention.	.30
2/29/24	JB	Review letter order denying CCDC's request to attend phone conference.	.10
2/29/24	JB	Review email from RDP to all defense counsel regarding call to discuss; review multiple replies; review with DL and KS regarding OTSC and brief	.40
2/29/24	JB	Review with AJG and HC regarding experts and client certs; review various articles and cases sent by AJG for review; review with RDP and AJG regarding experts; telephone conference with RDP regarding brief.	.90
2/29/24	JB	Review order from court setting schedule; review order from court granting overlength briefs.	.30
2/29/24	HC	(Kim). Strategizing for week ahead. Located deadlines for JB.	.20

April 30, 2024
Invoice No.: 512134

Date	Atty	Description Of Services Rendered	Hours
3/01/24	KS	Discuss case background and status with JB, HC, and DL. Plan next steps. Review papers filed in support of motion for preliminary injunction. Participate in call with HC and Dominion representative. Prepare notes and circulate call summary.	2.10
3/01/24	HC	Call with all attorneys. Reviewed memorandum sent by TC. Corresponded with team regarding next steps.	1.70
3/01/24	HC	Call with dominion on feasibility of changing ballot design. Call with KS and RDP regarding same.	.60
3/01/24	DAL	Video conference with co-counsel regarding strategy. Conference with JB, KS and HCC regarding preliminary injunction opposition brief. Draft preliminary injunction opposition brief and research regarding same.	6.90
3/02/24	AJG	Email exchanges re Dominion with co counsel and related parties	.30
3/02/24	AJG	Review status of matter and strategy issues .5; email exchanges with GB team re Daubert in limine motions .2; emails to clients re status .3; emails to M Natale (Burlington) .2; telephone call with R Giles (Dominion) .3 emails to counsel re experts and Seton Hall symposium evidence .3	1.80
3/02/24	JB	Review emails with defense counsel regarding analysis of expert reports.	.30
3/02/24	RDP	Exchange emails regarding filings.	.30
3/02/24	KS	Research case law related to irreparable harm and laches.	1.20
3/02/24	HC	Call with AJG regarding brief.	.30
3/02/24	DAL	Draft preliminary injunction opposition brief and research regarding same.	8.40
3/03/24	JB	Begin preparation of statement of facts; review emails with team regarding research and brief points; review emails with defense counsel regarding in limines on experts; review with AJG regarding same; review emails with AJG and R. Giles; review emails with plaintiff attorney and defense counsel regarding discovery; review RDP's draft letter on service; review DL's brief point; review emails with defense counsel regarding experts; review with AJG and RDP regarding legal arguments in brief and MTD.	4.20
3/03/24	RDP	Attend to strategy for hearing; emails and calls with defense team; attend to discovery issues; review drafts; calls with adversaries.	3.20
3/03/24	KS	Research case law related to irreparable harm, preliminary injunction standard, and undue delay. Draft brief section related to irreparable harm.	4.80

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Date	Atty	Description Of Services Rendered	Hours
3/05/24	AJG	Telephone call with joint client representatives .2 ; email exchanges re Clerk certifications to attorney teams , clerks , co counsel .5; Telephone call with P Kaufman .3 ; review Dominion certification uses with HC and KS .2; review strategy with JB .2; review brief strategy with RDP , HC , KS .3; call with J Feigenbaum :3 ; review brief .5	2.50
3/05/24	JB	Review emails with clients regarding analysis of expert reports; telephone conference with AJG regarding calls with clients; telephone conference with HC regarding brief; telephone conference with RDP regarding brief; continued revise and edit brief; prepare email to team with first draft of brief; review with HC and KS regarding edits AJG and RDP wanted to brief; review email from J. Carbone with ES&S cert; review same; review replies with defense counsel; review e-filing with issuance of additional summonses; review email from F. Komuves regarding accepting service; review email from F. Komuves with additional expert docs and briefly review same; review with HC regarding brief; review KS' part on balancing equities; review email from KS with notes from calls with clients; review with DL regarding finalizing brief; review emails with defense counsel regarding brief and arguments from Conforti.	3.60
3/05/24	RDP	Prepare for hearing with team; review and edit briefing; calls and emails regarding strategy.	2.30
3/05/24	PM	Interoffice call with AK, search FEC filings for payments made to Bromberg, or Weissman & Mintz and Pugach	1.80
3/05/24	KS	Coordinate research into different voting machines. Participate in call with Dominion. Draft certification for Dominion representative based on call. Prepare argument regarding balance of the equities for inclusion in opposition brief. Update brief with information from certifications. Circulate draft certification to Dominion for discussion. Finalize and circulate notes of calls with clients.	5.30
3/05/24	HC	Continued revising brief and certifications. Meetings with team regarding strategy for brief. Added facts and additional sections in for JB and RDP. Calls with clients and voting machine service regarding arguments.	8.40
3/05/24	DAL	Draft, review and revise brief in opposition to motion for preliminary injunction. Conferences with KS, HCC and JB regarding opposition to motion for preliminary injunction.	8.60

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Date	Atty	Description Of Services Rendered	Hours
3/07/24	KS	Meet with RDP, DAL, and HC to discuss motions in limine and hearing preparation. Prepare subpoena form and transmit to RDP. Begin drafting order of proof. Revise notice of motion and letter filings.	2.90
3/07/24	HC	Meeting with team on motions in limine. Calls with court regarding motion to dismiss. Calls with KS discussing same. Reviewed potential motion strategy. Reviewed filings by other parties.	2.40
3/08/24	AJG	Review discovery issues, related emails and attend meet and confer with Plaintiffs" counsel	.40
3/08/24	JB	Review e-filing from defendant with correct exhibit; review e-filing from Judge Quraishi regarding no motions; review with AJG and RDP; review orders (x2) granting overlength brief; review email from F. Komuves regarding call with all counsel to discuss expert discovery; review multiple replies; review email from HC with summary of call with counsel; review email from RDP to plaintiffs about pre-trial exchange; review replies; review with RDP regarding in limines; telephone conference with HC regarding status and next steps.	1.80
3/08/24	RDP	Attend to discovery disputes and strategy.	.90
3/08/24	KS	Research disqualification case law. Discuss preparation of motions in limine and cross examination outlines with HC and DAL. Begin researching scope of evidence at preliminary injunction hearings. Begin drafting motion in limine.	3.90
3/08/24	HC	Calls with opposing counsel and team regarding 3/18 hearing.	1.20
3/09/24	JB	Review with team regarding assignments; review email from RDP to plaintiffs about discovery; review email from F. Komuves with response to written discovery and review same; review multiple emails with defense counsel regarding responses and call tomorrow.	.90
3/09/24	RDP	Attend to discovery disputes and strategy; confer with team; emails with defense team and adversaries.	1.10
3/09/24	KS	Communicate with DL and HC regarding progress on Daubert motions. Begin research into disqualification. Prepare order of proof outline.	2.50
3/09/24	HC	Reviewed docket and researched relevant caselaw to draft section of brief. Continued drafting same.	5.40
3/09/24	DAL	Draft motion in limine to bar expert testimony and research in connection with same.	4.80

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Date	Atty	Description Of Services Rendered	Hours
3/12/24	AJG	Review litigation strategy with HC .3; Review amici filing and related research to object .5	.70
3/12/24	JB	Meet with team to go over hearing prep.	.60
3/12/24	JB	Review email from AJG regarding cross exam; review HC's research on political question doctrine; review emails with amici counsel R. Patel; review ACLU's motion to appear amicus; review motion to appear amicus by Election Law Clinic at Harvard; review e-filings of pro hac vice motions; review CCDC's reply brief on their motion to intervene; review emails with defense counsel regarding witnesses and exhibits; review email from RDP regarding ES&S; review email from F. Komuves adding Macias as witness; review replies; review amicus motions by Ravi Bhalla and one from League of Women Voters; review pro hac motion filings; review with AJG and RDP regarding amicus applications.	3.00
3/12/24	RDP	Review and respond to emails; review filings from parties; attend to discovery matters; confer with counsel; prepare for hearing.	2.70
3/12/24	KS	Discuss strategy, status of motions, and possible invocation of political question doctrine with RDP, JB, DAL, and HC. Coordinate contacting Seton Hall regarding lecture given by Plaintiff expert Dr. Wang. Review amici filed in related voting case. Review case law related to daubert motions and motions in limine.	3.40
3/12/24	HC	Meeting with team regarding brief and outstanding assignments.	.60
3/12/24	HC	Reviewed and updated letter to court for RDP.	.40
3/12/24	DAL	Conference with RP, HCC, JB and KS regarding strategy.	.90
3/13/24	AJG	Review letter to Magistrate Bongiovanni and related emails .2; attend prep meeting with counsel for clerks 1.0; attend to subpoena re Seton Hall symposium ; prepare subpoena ; review same .6	.80

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Date	Atty	Description Of Services Rendered	Hours
3/14/24	JB	Telephone conference with RDP before team call; attend call with defense counsel to further discuss cross and hearing prep; telephone conference with HC to discuss hearing prep after defense call; review order from court granting amici motions; review with team; telephone conference with DL to discuss prep; review emails with team regarding witness identification; review email from B. Pugach regarding call and review replies; review letter from Y. Bromberg to court with Macias report and review same; review AAPI amicus brief; review letter prepared by KS objecting to amici; review letter filed by plaintiffs regarding discovery disputes; review with team; review amici briefs; review text order from court on dispute; review with team; review with DL and HC regarding motions in limine; review with team regarding privilege log; review RDP email to amici seeking discovery; review letter to court; review order from court barring amici discovery; review with team regarding in limines; review email from F. Komoves enclosing expert privilege log; review emails with RDP and plaintiff.	4.80
3/14/24	RDP	Prepare for cross-examination of witnesses; review and research same; prepare for hearing.	5.50
3/14/24	KS	Finish preparing draft letter regarding objections to the consideration of amici briefs. Incorporate revisions. File letter. Circulate draft order of proof outline. Finish drafting motion in limine regarding Pasek.	5.20
3/14/24	HC	Call with defense counsel regarding strategy.	.90
3/14/24	HC	Calls with team regarding expert rebuttals.	.80
3/14/24	HC	Completed motion in limine for expert report.	3.70
3/14/24	HC	Reviewed letter for RDP to court.	.40
3/14/24	DAL	Research regarding reconsideration motions. Videoconference with co-defense counsel regarding strategy. Draft motions in limine.	12.20
3/15/24	AJG	Participate in strategy call and preparation for hearing GB team	.60
3/15/24	AJG	Review expert reports, prepare for cross examination, expert backgrounds, prepare for hearing, numerous email exchanges with counsel team in these regards	1.00
3/15/24	AJG	Continued preparation for hearing, attend to subpoena production, expert inquiries, numerous email exchanges with counsel for clerks	1.20

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Date	Atty	Description Of Services Rendered	Hours
3/15/24	KS	Communicate with clerk regarding court room technology and ability to present exhibits. Circulate fact certifications to AJG for review. Circulate motion in limine prepared regarding Pasek. Discuss cross examination of experts and witnesses with AJG, JB, RDP, DAL, and HC. Research Pasek background and credentials. Prepare notices of motion and proposed order for motions in limine. Contact potential rebuttal experts and consultants. Circulate proposed hearing schedule filed. Begin reviewing Pasek's public lectures and publications. Review deposition testimony of associated experts.	9.10
3/15/24	HC	Organized binders for RDP and team for hearing.	.50
3/15/24	DAL	Attend joint defense video conference call. Draft motions in limine. Hearing preparation. Conferences with AJC, RDP, KS, HCC.	10.30
3/16/24	AJG	Telephone call with potential expert; review matter and preparation for hearing before Judge Quraishi ; review briefs and complaint filed by plaintiff; all pleadings ; conference with co counsel; review with GB team	8.00
3/16/24	JB	Review emails with defense counsel regarding call with plaintiffs to discuss privilege log; review emails with team regarding in limine motions; telephone conference with all counsel regarding privilege log; review emails with AJG and SL regarding expert research for cross; review privilege logs from plaintiff; review letter from RDP to court; review emails with plaintiff about confidentiality order and privilege log issues; review reply letters to court regarding privilege log; review text order from court;	2.40
3/16/24	RDP	Continue to prepare for hearing (discovery, privilege logs, examinations of witnesses, calls/emails with defense counsel, direct examinations, closing).	14.20

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Date	Atty	Description Of Services Rendered	Hours
3/17/24	KS	Continue reviewing previous Pasek work, academic articles, and testimony of experts in related cases. Finish preparing Pasek cross examination outline. Discuss AG letter filing with team. Assist with compilation of hard copy hearing materials. Draft certification from AJG regarding contact with potential rebuttal experts. Prepare exhibits to accompany Pasek cross examination.	14.40
3/17/24	DAL	Draft motions in limine. Draft Macias cross-examination outline. Preliminary injunction hearing preparation.	13.20
3/18/24	AJG	Attend hearing on preliminary injunction hearing before Hon. Zahid Quraishi	10.00
3/18/24	JB	Attend in person hearing before Judge Quraishi in Trenton Federal Court.	12.90
3/18/24	RDP	Continue to prepare for hearing (reconfigured closing and examinations); attend hearing before Judge Quarashi; calls with clients regarding same; strategy with team.	15.00
3/18/24	SHL	(Kim v Hanlon) Attention to emails with AJG regarding additional criticisms of Pasek in other cases and research same; surreply, counterexamples (x4), criticisms from Ho, Pasek's Twitter account, Mecinas v Hobbs, Pasek lectures; attention to email from AJG regarding youtube transcript and pull same; calls with Lexis regarding AI-assisted searches; review and Pasek lecture and draft cross examination questions; attention to emails from AJG regarding voting history, contributions, and public offices for Pasek and family members; research same; attention to email from AJG regarding Google Scholar and research Hisenkamp article; attention to emails from AJG regarding opposition research regarding Pasek and research same.	10.80
3/18/24	KS	Discuss hearing with HC and AJG.	.70
3/18/24	HC	Attended hearing for preliminary injunction.	14.70
3/18/24	DAL	Review and attention to filing of motions in limine.	.90
3/19/24	JB	Review multiple emails with defense counsel regarding post-hearing submissions; review multiple emails with team regarding research on bond and letter objecting to AG's submission; review text orders from court regarding deadlines for submissions; review replies with defense counsel; review with DL regarding briefing.	1.20
3/19/24	RDP	Follow up with team on next steps/strategy.	.80
3/19/24	KS	Discuss transcript order with HC. Review cross examination outline and begin preparing related letter.	.60
3/19/24	DAL	Research and review matter background materials relating to preliminary injunction bond.	2.10

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Date	Atty	Description Of Services Rendered	Hours
3/22/24	DAL	Draft letter brief and certification in support of requirement to post bond. Review and revise submission regarding Pasek submission. Conferences and correspondence with joint client representatives regarding bond submission. Review preliminary injunction hearing transcript.	5.70
3/24/24	JB	Review multiple emails with defense team about T. Murphy dropping out and affect on case and request to case manage case with court.	.90
3/24/24	KS	Coordinate updating clients with HC.	.40
TOTAL HOURS FOR SERVICES			603.20

DISBURSEMENTS

	Description	Amount
3/01/24	Court Reporter, 238 - Court Reporter fee for Transcript Request.	
3/19/24	Court Reporter, Megan M. McKay-Soule, 20240054 - Court Reporter fee In the matter of: 24-1098, Andy Kim v Hanlon, et al, Preliminary injunction hearing held 3/18/24.	
TOTAL DISBURSEMENTS		\$ 359.50
TOTAL THIS INVOICE		\$ 34,170.18



494 Broad Street
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County of Passaic
ATTN: Danielle Ireland-Imhof, Clerk
401 Grand Street
Room 214
Paterson, NJ 07505
CountyClerkElections@passaiccountynj.org

April 30, 2024
Invoice No.: 512134
Updated 4.30.24 (MDaCosta)

*****THIS INVOICE REPLACES INVOICE NO. 512107*****
INVOICE SUMMARY

For professional services rendered and disbursements through March 24, 2024

Client Matter: 1154.215

RE: Kim v. Hanlon, et al.

Professional Services Rendered: Total Hours (3 County Representation)	603.20
1/3 Hours Billable to Passaic County Clerk	201.07
Blended Hourly Rate Applied to Attorneys:	\$175.00
Hourly Rate Applied to Paralegals:	\$75.00
Fees for Professional Services Rendered	\$ 33,810.68
Total Disbursements	<u>\$ 359.50</u>
TOTAL DUE	\$ 34,170.18

April 30, 2024
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PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
2/26/24	AJG	Review Complain 1.0; review related emails with joint client representatives and exchanges re engagement to defend.	1.50
2/26/24	JB	Review OTSC, NOM for emergent relief and briefly review verified complaint.	1.00
2/27/24	AJG	Review complaint; telephone call with E Oatman and joint client representatives re engagement and strategy.	.20
2/27/24	AJG	Emails with joint client representatives; review Complaint	.50
2/27/24	AJG	Telephone call with joint client representatives re status and strategy	.20
2/27/24	JB	Review with AJG regarding matter; telephone conference with HC regarding matter; begin review and analyze of pleadings.	1.50
2/27/24	JB	Review multiple emails with AJG, B. Pugach and F. Komuves regarding representation, service and full pleadings; review email from F. Komuves with link to full pleadings filed and discussing hearing on Thursday.	.60
2/27/24	RDP	Review Order to Show Cause and filing; confer with legal team.	1.50
2/27/24	HC	(Kim) Discussed matter with JB and BG. Reviewed documents discussing matter.	.40
2/28/24	AJG	Prepare for CMC with Judge Quraishi .2; telephone call with joint client representatives re strategy .4	.60
2/28/24	JB	Review with AJG and HC regarding convention schedule and review email from HC with convention schedule and ballot schedule for primary.	.30
2/28/24	JB	Review letter brief submitted by co-defendant Hanlon and review with AJG and HC.	.30
2/28/24	JB	(Kim) begin review of full pleadings, including brief; review with HC regarding prior ruling on intervention.	2.00
2/28/24	JB	Review emails with AJG and state regarding intervening; review emails with plaintiff regarding joint client representation	.30
2/28/24	JB	(Kim) Prepare and file notice of appearance.	.10
2/28/24	JB	Prepare and file notice of appearance.	.10

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2/28/24	JB	Review notices of appearance filed by multiple other attorneys.	.30
2/28/24	RDP	Confer with team on strategy; review documents.	.90
2/28/24	HC	(Kim) Call with TO and AJG regarding matter. Reviewed docket and complaint.	.80
2/28/24	HC	(Kim) Located documents for AJG. Reviewed Conforti docket for specific language for AJG. Drafted calendar of all relevant election events. Reviewed NOA's	4.20
2/28/24	HC	(Kim) obtained information on co-defendant for AJG.	.10
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2/28/24	HC	(Kim) Discussed matter with RDP.	.30
2/28/24	HC	(Kim) Reviewed complaint and noted potential counter arguments. Reviewed supporting documents and opposition to complaint.	3.10
2/29/24	AJG	Kim v Hanlon: Prepare for hearing / CMC before Judge Quraishi .5; attend CMC .5; post hearing review with RDP, JB, HC .3; emails to proposed expert Alvarez and related follow up .5; research federal cases .3	2.10
2/29/24	JB	Telephone conference with AJG to go over conference with court; telephone conference with court and all counsel to discuss briefing schedule and OTSC: telephone conference with RDP to discuss next steps; review with HC regarding conference and next steps.	1.30
2/29/24	JB	Review additional notices of appearances on e-fling; review letter from Camden Democratic Committee regarding intervention.	.30
2/29/24	JB	Review letter order denying CCDC's request to attend phone conference.	.10
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2/29/24	JB	Review with AJG and HC regarding experts and client certs; review various articles and cases sent by AJG for review; review with RDP and AJG regarding experts; telephone conference with RDP regarding brief.	.90
2/29/24	JB	Review order from court setting schedule; review order from court granting overlength briefs.	.30
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Date	Atty	Description Of Services Rendered	Hours
2/29/24	HC	(Kim) call with AJG regarding expert.	.10
2/29/24	HC	(Kim) Reviewed documents for AJG. Located documents for RDP. Calls with TC regarding research. Reviewed potential expert witnesses. Call with JB regarding brief and subsequent schedule. Strategizing potential counterarguments for opposition motion.	4.20
2/29/24	HC	(Kim) Reviewed and outlined expert reports sent by Plaintiffs.	2.20
2/29/24	HC	(Kim) Corresponded with team regarding legal strategy.	.50
2/29/24	DAL	Review and analysis of OTSC papers.	2.40
3/01/24	AJG	BALLOT LINE LITIGATION: d meeting with co counsel .8; prepare emails re strategy to RDP, JB, HC .5; emails related to transcript of Seton Hall symposium .2; email exchanges re with VA , counsel team .3	1.60
3/01/24	JB	Telephone conference with all defense counsel to discuss strategy for preliminary injunction hearing; telephone conference with RDP after to discuss strategy; telephone conference with AJG; review notes from J. Carbone regarding call.	1.50
3/01/24	JB	Review with RDP and AJG regarding various theories; review with KS regarding brief; telephone conference with KS, DL and HC to go over arguments and splitting up brief.	1.50
3/01/24	JB	Review HC's notes from call with Monmouth; review email from B. Nelson regarding A. Kim as witness; review replies.	.30
3/01/24	JB	Review email from J. Carbone with proposed joint defense agreement and review same.	.30
3/01/24	JB	Review transcript from CMC.	.30
3/01/24	JB	Review email from AJG summarizing defense call; review emails with client regarding calling Dominion; review with HC and KS regarding Dominion call; review KS's notes from call with Dominion; review with AJG and KS.	.60
3/01/24	JB	Review emails with defense counsel regarding discovery; review email from M. Natale with draft requests and review same; prepare reply; review replies from defense counsel; telephone conference with RDP regarding same; review email to plaintiff forwarding requests; review reply from RDP.	.80
3/01/24	RDP	Review strategy with AJG and JB; calls and emails with defense counsel; confer on overall strategy with M. Natale; calls with clients and related parties.	3.20

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3/01/24	KS	Discuss case background and status with JB, HC, and DL. Plan next steps. Review papers filed in support of motion for preliminary injunction. Participate in call with HC and Dominion representative. Prepare notes and circulate call summary.	2.10
3/01/24	HC	Call with all attorneys. Reviewed memorandum sent by TC. Corresponded with team regarding next steps.	1.70
3/01/24	HC	Call with dominion on feasibility of changing ballot design. Call with KS and RDP regarding same.	.60
3/01/24	DAL	Video conference with co-counsel regarding strategy. Conference with JB, KS and HCC regarding preliminary injunction opposition brief. Draft preliminary injunction opposition brief and research regarding same.	6.90
3/02/24	AJG	Email exchanges re Dominion with co counsel and related parties	.30
3/02/24	AJG	Review status of matter and strategy issues .5; email exchanges with GB team re Daubert in limine motions .2; emails to clients re status .3; emails to M Natale (Burlington) .2; telephone call with R Giles (Dominion) .3 emails to counsel re experts and Seton Hall symposium evidence .3	1.80
3/02/24	JB	Review emails with defense counsel regarding analysis of expert reports.	.30
3/02/24	RDP	Exchange emails regarding filings.	.30
3/02/24	KS	Research case law related to irreparable harm and laches.	1.20
3/02/24	HC	Call with AJG regarding brief.	.30
3/02/24	DAL	Draft preliminary injunction opposition brief and research regarding same.	8.40
3/03/24	JB	Begin preparation of statement of facts; review emails with team regarding research and brief points; review emails with defense counsel regarding in limines on experts; review with AJG regarding same; review emails with AJG and R. Giles; review emails with plaintiff attorney and defense counsel regarding discovery; review RDP's draft letter on service; review DL's brief point; review emails with defense counsel regarding experts; review with AJG and RDP regarding legal arguments in brief and MTD.	4.20
3/03/24	RDP	Attend to strategy for hearing; emails and calls with defense team; attend to discovery issues; review drafts; calls with adversaries.	3.20
3/03/24	KS	Research case law related to irreparable harm, preliminary injunction standard, and undue delay. Draft brief section related to irreparable harm.	4.80

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3/03/24	HC	Drafted section of brief for AJG.	6.00
3/03/24	DAL	Draft preliminary injunction opposition brief and research regarding same.	5.10
3/04/24	AJG	Ballot Line Litigation: Review strategy re Dominion, report of same , evaluate with counsel with county clerks	.50
3/04/24	AJG	Ballot Line Litigation: numerous email exchanges with counsel for other county clerks, review Dominion and E S & S issues; review complaint and develop defense strategy; numerous email exchanges with GB defense team re preparation of response to PI	1.50
3/04/24	AJG	Review matter for engagement and substitution; email with County Counsel, prepare for call with T Bachman	.20
3/04/24	JB	Review emails with defense counsel regarding call with Dominion lawyer; telephone conference with HC regarding expert call; revise and edit brief points of DL and prepare standard language for OTSC; telephone conference with HC, DL and KS regarding brief; review motion to intervene filed by Camden County Democrats; review emails with defense counsel regarding Sass Rubin report and in limine motions; review requests for summonses e-filed by Plaintiffs; revise and edit KS's brief point; review email from HC regarding call with Dominion; review case on mandatory injunction and review with DL; review email from F. Komuves with expert docs; review with team; review email from L. Kurtz summarizing facts for Dominion; review with team regarding client calls; review with team regarding expert docs received.	8.40
3/04/24	RDP	Prepare for hearing with team; review and edit briefing; calls and emails regarding strategy.	3.30
3/04/24	KS	Discuss opposition papers with JB, HC, and DAL. Update and revise opposition brief. Participate in call with Dominion atty. Prepare and circulate call notes.	3.60
3/04/24	HC	Updated brief with RDP's edits. Drafted and revised sections of brief.	5.40
3/04/24	HC	Reviewed CMC transcript.	.50
3/04/24	DAL	Conference with JB, KS and HCC regarding opposition to preliminary injunction. Draft opposition brief to motion for preliminary injunction. Correspondence with AJC and RP regarding opposition to preliminary injunction motion.	5.70

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3/05/24	AJG	Telephone call with joint client representatives .2 ; email exchanges re Clerk certifications to attorney teams , clerks , co counsel .5; Telephone call with P Kaufman .3 ; review Dominion certification uses with HC and KS .2; review strategy with JB .2; review brief strategy with RDP , HC , KS .3; call with J Feigenbaum :3 ; review brief .5	2.50
3/05/24	JB	Review emails with clients regarding analysis of expert reports; telephone conference with AJG regarding calls with clients; telephone conference with HC regarding brief; telephone conference with RDP regarding brief; continued revise and edit brief; prepare email to team with first draft of brief; review with HC and KS regarding edits AJG and RDP wanted to brief; review email from J. Carbone with ES&S cert; review same; review replies with defense counsel; review e-filing with issuance of additional summonses; review email from F. Komuves regarding accepting service; review email from F. Komuves with additional expert docs and briefly review same; review with HC regarding brief; review KS' part on balancing equities; review email from KS with notes from calls with clients; review with DL regarding finalizing brief; review emails with defense counsel regarding brief and arguments from Conforti.	3.60
3/05/24	RDP	Prepare for hearing with team; review and edit briefing; calls and emails regarding strategy.	2.30
3/05/24	PM	Interoffice call with AK, search FEC filings for payments made to Bromberg, or Weissman & Mintz and Pugach	1.80
3/05/24	KS	Coordinate research into different voting machines. Participate in call with Dominion. Draft certification for Dominion representative based on call. Prepare argument regarding balance of the equities for inclusion in opposition brief. Update brief with information from certifications. Circulate draft certification to Dominion for discussion. Finalize and circulate notes of calls with clients.	5.30
3/05/24	HC	Continued revising brief and certifications. Meetings with team regarding strategy for brief. Added facts and additional sections in for JB and RDP. Calls with clients and voting machine service regarding arguments.	8.40
3/05/24	DAL	Draft, review and revise brief in opposition to motion for preliminary injunction. Conferences with KS, HCC and JB regarding opposition to motion for preliminary injunction.	8.60

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3/06/24	JB	Continued revise and edit brief; review multiple emails with team regarding comments on brief; telephone conferences with team to discuss brief and changes; review letter to court regarding motion; review with AJG regarding accepting service; review emails about facts from clients and potential testimony; prepare email to M. Natale regarding his clerk testifying and review reply; telephone conference with RDP and DL to discuss cross-motion; review email from AJG regarding Dominion cert; review same; review Atlantic County's opposition papers; review with DL and HC regarding same; review HC's draft of cert; review DL's cross motion point; review KS's notice of motion and review with her; review email from M. Natale with Royal Printing cert and review same; review email from L. Kurtz with Dominion cert and review same; review Grossi cert; review emails with L. Kurz regarding Dominion cert and review HC's edits; review with HC regarding finalizing brief; review with team regarding filing same and overlength; review finalized and filed pleadings; review Camden County Clerk's opposition; briefly review Essex and Bergen oppositions; review opposition by Schwartz..	7.50
3/06/24	RDP	Prepare for hearing with team; review and edit briefing; calls and emails regarding strategy.	4.20
3/06/24	KS	Circulate updates to DAL, JB, and HC regarding certification from ES&S and conversation with Dominion. Draft notice of motion. Review updated certification from Dominion. Perform final revisions in draft brief. Review citations and finalized documents in advance of filing. Finalize letter to Judge regarding intention to file cross motion under Rule 12(b)(7).	7.70
3/06/24	HC	Work with team to revise, complete and finalize brief and supporting documentation. Finalized and reviewed same. Calls and meetings regarding same.	13.20
3/06/24	DAL	Draft review and revise opposition to preliminary injunction motion and attention to filing of the same. Research regarding Rule 19. Conferences with RDP regarding opposition to preliminary injunction motion.	9.60
3/07/24	AJG	Review strategy with RDP	.50
3/07/24	JB	Review with team regarding filing and notice of cross-motion; review emails with defense counsel regarding briefs; review email from attorney for AAIPA regarding consent to file amicus brief and review with RDP and AJG; review reply email from RDP; telephone conference with HC regarding in limines; review letter from RDP to court; review letter from plaintiff to defense counsel about expert discovery; review replies from defense counsel; briefly review additional defendants' opposition to OTSC.	2.30
3/07/24	RDP	Attend to discovery disputes.	.70

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3/07/24	KS	Meet with RDP, DAL, and HC to discuss motions in limine and hearing preparation. Prepare subpoena form and transmit to RDP. Begin drafting order of proof. Revise notice of motion and letter filings.	2.90
3/07/24	HC	Meeting with team on motions in limine. Calls with court regarding motion to dismiss. Calls with KS discussing same. Reviewed potential motion strategy. Reviewed filings by other parties.	2.40
3/08/24	AJG	Review discovery issues, related emails and attend meet and confer with Plaintiffs" counsel	.40
3/08/24	JB	Review e-filing from defendant with correct exhibit; review e-filing from Judge Quraishi regarding no motions; review with AJG and RDP; review orders (x2) granting overlength brief; review email from F. Komuves regarding call with all counsel to discuss expert discovery; review multiple replies; review email from HC with summary of call with counsel; review email from RDP to plaintiffs about pre-trial exchange; review replies; review with RDP regarding in limines; telephone conference with HC regarding status and next steps.	1.80
3/08/24	RDP	Attend to discovery disputes and strategy.	.90
3/08/24	KS	Research disqualification case law. Discuss preparation of motions in limine and cross examination outlines with HC and DAL. Begin researching scope of evidence at preliminary injunction hearings. Begin drafting motion in limine.	3.90
3/08/24	HC	Calls with opposing counsel and team regarding 3/18 hearing.	1.20
3/09/24	JB	Review with team regarding assignments; review email from RDP to plaintiffs about discovery; review email from F. Komuves with response to written discovery and review same; review multiple emails with defense counsel regarding responses and call tomorrow.	.90
3/09/24	RDP	Attend to discovery disputes and strategy; confer with team; emails with defense team and adversaries.	1.10
3/09/24	KS	Communicate with DL and HC regarding progress on Daubert motions. Begin research into disqualification. Prepare order of proof outline.	2.50
3/09/24	HC	Reviewed docket and researched relevant caselaw to draft section of brief. Continued drafting same.	5.40
3/09/24	DAL	Draft motion in limine to bar expert testimony and research in connection with same.	4.80

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3/10/24	AJG	Attend telephone meet and confer re discovery issues with Plaintiff counsel and all counsel	1.50
3/10/24	AJG	Review in limine brief strategy and outline brief arguments/ research	.50
3/10/24	JB	Review email from F. Komuves with expert invoices and review same; review email from B. Pugach regarding 5 PM call; review multiple replies; review emails with defense counsel regarding witnesses for hearing; review email from HC with notes from call with all counsel; review email from DAL with Wang in limine; review with AJG and DAL	1.50
3/10/24	RDP	Attend to discovery disputes and strategy; confer with team; emails with defense team and adversaries; prepare for trial.	2.20
3/10/24	KS	Prepare draft subpoena cover letter.	.40
3/10/24	HC	Call with opposing counsel regarding meet and confer to discuss discovery issues. Summarized same for team.	1.50
3/10/24	DAL	Draft motion to bar Wang testimony.	3.60
3/11/24	AJG	Review Plaintiff filings and related emails from counsel	.20
3/11/24	JB	Attend defense counsel call to discuss hearing; telephone conference with RDP after call to discuss.	.90
3/11/24	JB	Review email from DAL with notes from defense counsel call; review same; telephone conference with KS, HC and DL to discuss next steps and tasks for hearing prep; review email from F. Komuves regarding supplemental responses and enclosing Pasek reply; review same; review replies from defense counsel; review plaintiff's opposition to CCDC's motion to intervene; review email from F. Komuves with initial witness/exhibit list and review same; review emails among counsel; telephone conference with HC regarding status.	3.00
3/11/24	RDP	Review and respond to emails; review plan for in limine motions with team; attend to discovery matters; confer with counsel.	.60
3/11/24	HC	Call with counsel for plaintiffs. Summarized same for team.	1.50
3/11/24	HC	Reviewed submissions on docket. Reviewed expert reports in complaint to assist in drafting in limine motions.	3.30
3/11/24	DAL	Attend joint defense Zoom conference call. Conference with JB, TCC and KS regarding strategy.	1.70

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3/12/24	AJG	Review litigation strategy with HC .3; Review amici filing and related research to object .5	.70
3/12/24	JB	Meet with team to go over hearing prep.	.60
3/12/24	JB	Review email from AJG regarding cross exam; review HC's research on political question doctrine; review emails with amici counsel R. Patel; review ACLU's motion to appear amicus; review motion to appear amicus by Election Law Clinic at Harvard; review e-filings of pro hac vice motions; review CCDC's reply brief on their motion to intervene; review emails with defense counsel regarding witnesses and exhibits; review email from RDP regarding ES&S; review email from F. Komuves adding Macias as witness; review replies; review amicus motions by Ravi Bhalla and one from League of Women Voters; review pro hac motion filings; review with AJG and RDP regarding amicus applications.	3.00
3/12/24	RDP	Review and respond to emails; review filings from parties; attend to discovery matters; confer with counsel; prepare for hearing.	2.70
3/12/24	KS	Discuss strategy, status of motions, and possible invocation of political question doctrine with RDP, JB, DAL, and HC. Coordinate contacting Seton Hall regarding lecture given by Plaintiff expert Dr. Wang. Review amici filed in related voting case. Review case law related to daubert motions and motions in limine.	3.40
3/12/24	HC	Meeting with team regarding brief and outstanding assignments.	.60
3/12/24	HC	Reviewed and updated letter to court for RDP.	.40
3/12/24	DAL	Conference with RP, HCC, JB and KS regarding strategy.	.90
3/13/24	AJG	Review letter to Magistrate Bongiovanni and related emails .2; attend prep meeting with counsel for clerks 1.0; attend to subpoena re Seton Hall symposium ; prepare subpoena ; review same .6	.80

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Date	Affy	Description Of Services Rendered	Hours
3/13/24	JB	Attend zoom with all defense counsel to discuss trial; review plaintiff's reply brief and amended expert reports served with reply brief; review RDP letter to Judge Bongiovanni regarding discovery; review with team regarding same; review email from plaintiff with summons and complaint and acknowledgement of service; review with AJG and team regarding Seton Hall subpoena; telephone conference with RDP regarding trial; telephone conference with KS regarding subpoena; review and reply to emails about same; review defense letters to court joining in RDP letter; review text orders from court (x2); review motion by NJ Law Professors with motion to file amicus brief; review emails with defense team regarding trial; review emails with plaintiff and defense counsel regarding expert discovery; review email from plaintiff with additional docs on experts	3.40
3/13/24	RDP	Prepare for hearing with team; review opposition briefing; review amicus.	5.60
3/13/24	KS	Coordinate preparing subpoena to Seton Hall regarding lecture given by Dr. Wang on related topic. Contact Seton Hall regarding same. Continue drafting motion in limine regarding Pasek. Serve notice of subpoena on all counsel. Draft letter regarding objections to amici submissions.	6.80
3/13/24	HC	Call with defense counsel regarding strategy. Prepared for same.	1.20
3/13/24	HC	Reviewed expert reports to assist in draft Daubert motions.	1.20
3/13/24	HC	Located ballot drawing statutes for RDP.	.20
3/13/24	HC	Drafted first section of motion in limine. Conducted research in support of same.	3.30
3/13/24	DAL	Joint defense video conference regarding strategy for preliminary injunction hearing. Research for motions in limine.	3.20
3/14/24	AJG	Telephone call with Clerk clients re strategy for PI hearing .6;	.60

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Date	Atty	Description Of Services Rendered	Hours
3/14/24	JB	Telephone conference with RDP before team call; attend call with defense counsel to further discuss cross and hearing prep; telephone conference with HC to discuss hearing prep after defense call; review order from court granting amici motions; review with team; telephone conference with DL to discuss prep; review emails with team regarding witness identification; review email from B. Pugach regarding call and review replies; review letter from Y. Bromberg to court with Macias report and review same; review AAPI amicus brief; review letter prepared by KS objecting to amici; review letter filed by plaintiffs regarding discovery disputes; review with team; review amici briefs; review text order from court on dispute; review with team; review with DL and HC regarding motions in limine; review with team regarding privilege log; review RDP email to amici seeking discovery; review letter to court; review order from court barring amici discovery; review with team regarding in limines; review email from F. Komoves enclosing expert privilege log; review emails with RDP and plaintiff.	4.80
3/14/24	RDP	Prepare for cross-examination of witnesses; review and research same; prepare for hearing.	5.50
3/14/24	KS	Finish preparing draft letter regarding objections to the consideration of amici briefs. Incorporate revisions. File letter. Circulate draft order of proof outline. Finish drafting motion in limine regarding Pasek.	5.20
3/14/24	HC	Call with defense counsel regarding strategy.	.90
3/14/24	HC	Calls with team regarding expert rebuttals.	.80
3/14/24	HC	Completed motion in limine for expert report.	3.70
3/14/24	HC	Reviewed letter for RDP to court.	.40
3/14/24	DAL	Research regarding reconsideration motions. Videoconference with co-defense counsel regarding strategy. Draft motions in limine.	12.20
3/15/24	AJG	Participate in strategy call and preparation for hearing GB team	.60
3/15/24	AJG	Review expert reports, prepare for cross examination, expert backgrounds, prepare for hearing, numerous email exchanges with counsel team in these regards	1.00
3/15/24	AJG	Continued preparation for hearing, attend to subpoena production, expert inquiries, numerous email exchanges with counsel for clerks	1.20

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3/15/24	JB	Telephone conference with team to discuss tasks for pre-trial submission and trial prep; attend meet and confer on pre-trial submission with all counsel; various conference calls with team - DL, KS and HC to discuss pre-trial submission and in limines; begin reviewing and revising in limines (x5); review emails with internal team regarding same; review RDP letter to court regarding discovery; review amicus brief of NJ Prof. Lawyers; review email from plaintiff regarding expert privilege log; review reply from RDP; review letters to court on discovery; review court's text order; review amicus brief from League of Women Voters; review certification from H. Mackey; review pre-hearing submission drafts and comments; review emails with all counsel regarding same and deadline to serve court; review e-filing of same and court's signed order; review multiple emails with all counsel regarding call to discuss privilege log; attend call with all counsel; review and reply to calls with team regarding trial prep.	6.60
3/15/24	RDP	Continue to prepare for hearing; multiple calls and emails with counsel; attend to discovery issues (privilege logs) and related matters; research regarding Sass-Rubin; research regarding Wang; research regarding Schoenberg; prepare for cross-examination; begin to prepare closing.	11.10
3/15/24	SHL	Teleconference with AJG and KS regarding opposition research on Pasek; attention to email from KS regarding same, research PACER, Westlaw, social media accounts, and academic sites regarding same and teleconference with KS regarding same; research campaign contributions and attention to emails with AJG and ADK regarding same; attention to emails with AJG regarding criticisms of primacy theory and research same; attention to email from AJG regarding direct testimony by Pasek and counsel for opposition to Pasek and Krosnick; research same; attention to emails with AJG and KS regarding contacts and background information regarding Drs. MacDonald and Ho; attention to email from AJG regarding expert report by Ho and pull same; research and verify same; research and verify contacts of counsel for same; attention to emails with RDP regarding motion in limine; attention to emails with AJG and KS regarding direct testimony by Pasek in Green Party v Hargett; research same; attention to email from KS regarding expert report of Macdonald and research same; attention to email with AJG regarding expert reports of Pasek and pull same; research counsel contacts and background regarding Nelson v MacWarner and attention to emails with AJG and KS regarding same; attention to emails with AJG and KS regarding cross examination of Krosnick; attention to emails with AJG and KS regarding questions for Macdonald and brief in opposition; attention to emails with AJG regarding CV of Pasek and pull same; teleconference with and attention to emails with AJG regarding Krosnick references to Pasek studies in Nelson v MacWarner and pull same; pull substantive filings from Nelson v Warner and upload same to shared drive; attention to emails with KS and AJG regarding complaint.	11.20

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3/15/24	KS	Communicate with clerk regarding court room technology and ability to present exhibits. Circulate fact certifications to AJG for review. Circulate motion in limine prepared regarding Pasek. Discuss cross examination of experts and witnesses with AJG, JB, RDP, DAL, and HC. Research Pasek background and credentials. Prepare notices of motion and proposed order for motions in limine. Contact potential rebuttal experts and consultants. Circulate proposed hearing schedule filed. Begin reviewing Pasek's public lectures and publications. Review deposition testimony of associated experts.	9.10
3/15/24	HC	Organized binders for RDP and team for hearing.	.50
3/15/24	DAL	Attend joint defense video conference call. Draft motions in limine. Hearing preparation. Conferences with AJC, RDP, KS, HCC.	10.30
3/16/24	AJG	Telephone call with potential expert; review matter and preparation for hearing before Judge Quraishi ; review briefs and complaint filed by plaintiff; all pleadings ; conference with co counsel; review with GB team	8.00
3/16/24	JB	Review emails with defense counsel regarding call with plaintiffs to discuss privilege log; review emails with team regarding in limine motions; telephone conference with all counsel regarding privilege log; review emails with AJG and SL regarding expert research for cross; review privilege logs from plaintiff; review letter from RDP to court; review emails with plaintiff about confidentiality order and privilege log issues; review reply letters to court regarding privilege log; review text order from court;	2.40
3/16/24	RDP	Continue to prepare for hearing (discovery, privilege logs, examinations of witnesses, calls/emails with defense counsel, direct examinations, closing).	14.20

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Date	Atty	Description Of Services Rendered	Hours
3/16/24	SHL	(Kim v Hanlon) Run searches regarding Krosnick and attention to email to KZ regarding findings; attention to emails with AJG regarding direct testimony and certifications in Westlaw, PACER, and state court databases; research same; attention to emails with AJG regarding background for Pasek and research same; attention to emails with AJG regarding expert analytics for Pasek and research same; research public testimony, attention to email to AJG regarding same, and draft transcript; attention to email from RDP regarding Ryan Macias and research depositions, declarations, and reports regarding same, research same; attention to emails with AJG regarding Lexis; attention to emails with KS and AJG regarding Pasek's videos and interviews online, review and analyze same; attention to emails from AJG regarding counterexample articles (x4) and research same; attention to emails with AJG regarding Macdonald testimony, rebuttal reports, and background information regarding Macdonald; research same; attention to email from AJG regarding criticisms of regarding Pasek's studies and research same; analyze counterexample articles and attention to email to AJG regarding same; research additional rebuttal witnesses, pull Trende contact info, and attention to email to AJG regarding Sean Trende and findings in Mecinas v Hobbs.	17.50
3/16/24	KS	Review published Pasek lectures. Analyze cross examination of related experts on similar topics to discern topics for cross examination. Review academic literature on primary effect. Circulate draft brief and assist with preparing election timeline exhibits. Participate in call with statistical consultant and AJG. Prepare notes from call and incorporate topics into cross examination outline.	7.20
3/16/24	HC	Drafted examination outlines for key witnesses for RDP. Met with RDP regarding same. Helped created summation with RDP.	8.40
3/16/24	DAL	Review Macias report and analysis regarding same.	.90
3/17/24	AJG	Preparation for hearing before Judge Quraishi; consult with potential expert; review AG letter ; numerous telephone calls with co counsel; review and develop cross examination of witnesses; review all pleadings and case law	10.00
3/17/24	JB	Trial prep, including completion of in limine motions; review timeline from TC; review with RDP and HC regarding summation; finalize binders for witness cross; revise and edit cross of Pasek..	12.60
3/17/24	RDP	Continue to prepare for hearing (direct examinations, closing); review AG letter; calls/emails with counsel.	15.10

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Date	Atty	Description Of Services Rendered	Hours
3/17/24	KS	Continue reviewing previous Pasek work, academic articles, and testimony of experts in related cases. Finish preparing Pasek cross examination outline. Discuss AG letter filing with team. Assist with compilation of hard copy hearing materials. Draft certification from AJG regarding contact with potential rebuttal experts. Prepare exhibits to accompany Pasek cross examination.	14.40
3/17/24	DAL	Draft motions in limine. Draft Macias cross-examination outline. Preliminary injunction hearing preparation.	13.20
3/18/24	AJG	Attend hearing on preliminary injunction hearing before Hon. Zahid Quraishi	10.00
3/18/24	JB	Attend in person hearing before Judge Quraishi in Trenton Federal Court.	12.90
3/18/24	RDP	Continue to prepare for hearing (reconfigured closing and examinations); attend hearing before Judge Quarashi; calls with clients regarding same; strategy with team.	15.00
3/18/24	SHL	(Kim v Hanlon) Attention to emails with AJG regarding additional criticisms of Pasek in other cases and research same; surreply, counterexamples (x4), criticisms from Ho, Pasek's Twitter account, Mecinas v Hobbs, Pasek lectures; attention to email from AJG regarding youtube transcript and pull same; calls with Lexis regarding AI-assisted searches; review and Pasek lecture and draft cross examination questions; attention to emails from AJG regarding voting history, contributions, and public offices for Pasek and family members; research same; attention to email from AJG regarding Google Scholar and research Hisenkamp article; attention to emails from AJG regarding opposition research regarding Pasek and research same.	10.80
3/18/24	KS	Discuss hearing with HC and AJG.	.70
3/18/24	HC	Attended hearing for preliminary injunction.	14.70
3/18/24	DAL	Review and attention to filing of motions in limine.	.90
3/19/24	JB	Review multiple emails with defense counsel regarding post-hearing submissions; review multiple emails with team regarding research on bond and letter objecting to AG's submission; review text orders from court regarding deadlines for submissions; review replies with defense counsel; review with DL regarding briefing.	1.20
3/19/24	RDP	Follow up with team on next steps/strategy.	.80
3/19/24	KS	Discuss transcript order with HC. Review cross examination outline and begin preparing related letter.	.60
3/19/24	DAL	Research and review matter background materials relating to preliminary injunction bond.	2.10

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Date	Atty	Description Of Services Rendered	Hours
3/20/24	AJG	Participate in post hearing call with clerk counsel re potential appeals depending on outcome	.50
3/20/24	JB	Review emails regarding transcript of hearing; review multiple emails with defense counsel regarding division of labor on letters due to court; review email from B. Pugach regarding joint letter and call to discuss; review replies; review proposed letter; telephone conference with all counsel to discuss joint letter on exhibits; review with HC regarding exhibit D-3; review emails with counsel regarding same; review emails with defense counsel regarding cost for changes; review final letter from B. Pugach; review replies; review email from co-defendant regarding brief in Conforti filed by AG; review replies; review email from F. Komuves regarding subpoena.	2.40
3/20/24	KS	Contact court regarding transcript order. Review docketed text order. Continue preparing letter regarding drafted cross examination of Pasek.	.90
3/20/24	HC	Call with team regarding post hearing assignments.	.60
3/20/24	HC	Finalized hearing exhibits. Located documents on expert for DL.	2.40
3/20/24	DAL	Joint defense conference call. Telephone calls and correspondence with joint client representatives regarding bond.	4.60
3/21/24	JB	Review email from DL with transcript from hearing and briefly review same; review email from R. Willie with letter in response to AG letter; review same; review multiple reply emails with defense team regarding letter.	1.20
3/21/24	KS	Continue communicating with court clerk. Review transcript. Finish preparing draft letter regarding intended Pasek cross examination.	4.30
3/21/24	DAL	Draft submission regarding bond. Review hearing transcript.	6.30
3/22/24	JB	Review letter brief on Pasek cross; review with AJG and KS regarding AJG comments; review revised letter; review CCDC's letter to court joining in in limines; review e-filing of letter opposing AG's letter; review letter prepared by DL on bond issue with cert from client; review emails with team regarding same; review emails with client regarding same; review emails with defense counsel on submissions; review CCDC's letter opposing AG submission; review e-filings from court with letter from plaintiff and 4 updated expert certs and review certs.	3.00
3/22/24	KS	Revise draft letter. Discuss revisions with AJG. Finalize and coordinate filing. Transmit original brief to AJG for review.	1.50

GENOVA BURNS LLC

April 30, 2024
 Invoice No.: 512134

Date	Atty	Description Of Services Rendered	Hours
3/22/24	DAL	Draft letter brief and certification in support of requirement to post bond. Review and revise submission regarding Pasek submission. Conferences and correspondence with joint client representatives regarding bond submission. Review preliminary injunction hearing transcript.	5.70
3/24/24	JB	Review multiple emails with defense team about T. Murphy dropping out and affect on case and request to case manage case with court.	.90
3/24/24	KS	Coordinate updating clients with HC.	.40
TOTAL HOURS FOR SERVICES			603.20

DISBURSEMENTS

	Description	Amount
3/01/24	Court Reporter, 238 - Court Reporter fee for Transcript Request.	
3/19/24	Court Reporter, Megan M. McKay-Soule, 20240054 - Court Reporter fee In the matter of: 24-1098, Andy Kim v Hanlon, et al, Preliminary injunction hearing held 3/18/24.	
TOTAL DISBURSEMENTS		\$ 359.50
TOTAL THIS INVOICE		\$ 34,170.18



494 Broad Street
Newark, NJ 07102-3230
Telephone 973-533-0777
Fax 973-814-4045
Tax ID# 22-2940404
www.genovaburns.com

County of Passaic
ATTN: Danielle Ireland-Imhof, Clerk
401 Grand Street
Room 214
Paterson, NJ 07505
CountyClerkElections@passaiccountynj.org

April 30, 2024
Invoice No.: 512134
Client Matter: 1154.215

REMITTANCE ADVICE

RE: Kim v. Hanlon, et al.

TOTAL DUE:

34,170.18

Payments via Wire/ACH are welcomed at:
Citizens Bank
1 Citizens Drive
Riverside, RI 02915
ABA: 011500120

Payments via Check can be mailed to:
Genova Burns LLC
ATTN: Accounts Receivable
494 Broad Street
Newark, NJ 07102-3230

Genova Burns LLC
Operating Account
494 Broad Street
Newark, NJ 07102
Account: 1000893972
Swift Code: CTZIUS33 (for international wires only)

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TERMS: DUE UPON RECEIPT