

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) LESLIE BRIGGS, as next friend of T.W.)
and B.S.;)
(2) EVAN WATSON, as next friend of C.R.;)
and,)
(3) HENRY A. MEYER, III, as next friend)
of A.M., for themselves and for others)
similarly situated,)

Plaintiffs,)

v.)

Case No: 23-cv-81-GKF-JFJ

(1) ALLIE FRIESEN in her official capacity)
as Commissioner of the Oklahoma)
Department of Mental Health and)
Substance Abuse Services; and)
(2) DEBBIE MORAN, in her official)
capacity as Interim Executive Director of the)
Oklahoma Forensic Center,)

Defendants.)

**UNOPPOSED SUPPLEMENTAL MOTION FOR PRELIMINARY
APPROVAL OF ATTORNEY FEES IN SUPPORT OF
JOINT MOTION FOR PRELIMINARY APPROVAL OF CONSENT DECREE**

This Unopposed Supplemental Motion for Preliminary Approval of Attorney Fees (“Supplemental Fee Motion”) is submitted by the Plaintiffs seeking preliminary approval of the attorney fee provisions set forth in in their Joint Motion for Preliminary Approval of Consent Decree, Class Certification, and Plan of Notice to Class (Doc. 46, hereafter “Joint Motion”).

This Supplemental Fee Motion is filed to enable the Court to preliminarily approve the provisions of the Consent Decree respecting attorney fees as

contemplated by Fed. R. Civ. P. 23(e)(1) and Fed. R. Civ. P. 54(d)(2). Plaintiffs are entitled to attorney fees under 42 U.S.C. § 1988.

The motion discusses the following matters:

- The provisions of the Consent Decree which provide for payment of attorney fees to Plaintiffs' attorneys. (Page 2)
- The work of the Plaintiffs' attorneys prior to filing the Joint Motion to develop and obtain the Consent Decree. (Page 3)
- The Plaintiffs' entitlement to attorney fees. (Page 5)
- The reasonableness of the fees Plaintiffs' attorneys will receive pursuant to the Consent Decree. (Page 6)

Consent Decree Provisions for Attorney Fees

The Consent Decree addresses attorney fees in three separate time periods. The First Period is from the initial investigative work on Oklahoma's competency restoration deficiencies until the filing of the Joint Motion. The Second Period covers the work done between the filing of the Joint Motion until the entry of the Consent Decree by the Court. The Third Period covers the work to be done after the entry of the Consent Decree by the Court during the duration of the Decree. (*See* Doc. 46-1, ¶¶ 101-103, p. 37).

During the First Period (prior to filing the Joint Motion), the Consent Decree provides that the Oklahoma Department of Mental Health and Substance Abuse Services ("Department") shall pay: (i) \$275,000 in attorney fees to Frederic Dorwart, Lawyers PLLC ("FDLaw"), and (ii) \$28,000 in attorney fees to the Oklahoma Disability Law Center ("ODLC"). (Doc. 46-1, ¶ 101, p. 37).

During the Second Period (from filing the Joint Motion until entry of the Consent Decree), the Consent Decree provides that the Department shall pay Plaintiffs' Counsel \$350 per hour. (*Id.* at ¶ 102).

During the Third Period, the Consent Decree provides that the Department shall pay Class Counsel attorney fees in the amount of \$325 per hour (capped at \$75,000 per year). (*Id.* at ¶ 103).

For the reasons hereafter set forth, it is likely this Court will, upon final consideration of the Consent Decree, find it reasonable to allow: (i) \$275,000 for attorney fees for work done prior to the filing the Consent Decree, (ii) \$350 per hour for attorney fees for work after the filing of the Joint Motion until entry of the Consent Decree obtaining preliminary approval of the Consent Decree, giving notice to Class members, establishing the Class, and (iii) \$325 per hour for attorney fees for the work done after the entry of the Consent Decree (capped at \$75,000 per year) representing the interests of the Class.

Plaintiffs' Attorneys' Work to Investigate Plaintiffs' Claims and Negotiate, Draft, and Obtain the Consent Decree

For the work done prior to the filing of the Joint Motion, the Consent Decree provides that the Department shall pay FDLaw **\$275,000** for all the work done by FDLaw lawyers and paralegals and ODLC **\$28,000**. The \$275,000 payable to FDLaw and the \$28,000 payable to ODLC: (i) were amounts negotiated with the Department, and (ii) are substantially less than the value of the work actually done. During the First Period, FDLaw lawyers worked 971.2 hours totaling \$539,259.75 at FDLaw's usual and customary billing rates (after pre-billing review and adjustment). *See*

Exhibit 1, FDLaw Adjusted Time Records. ODLIC lawyers worked 127.75 hours totaling \$43,837.50 at ODLIC's usual and customary billing rates. See Exhibit 2, ODLIC Time Records.

The Plaintiffs' legal work during the First Period—from initial investigation, analysis, development of the claims, drafting and filing the Complaint, and drafting and negotiating the Consent Decree with the Department—was principally done by Messrs. DeMuro, Dorwart, and Leimbach. It is contemplated that Plaintiffs' legal work in the Second Period—from the filing of the Joint Motion to approval of the Consent Decree by the Court—will also be done by Messrs. DeMuro, Dorwart, and Leimbach. The resumes of Messrs. Dorwart, DeMuro, and Leimbach are attached to this Motion as Exhibits 3, 4, and 5 respectively. The work during the First Period by ODLIC was done by Nicholas Southerland and Brian S. Wilkerson. The resumes of Messrs. Southerland and Wilkerson are attached to this Motion as Exhibits 6 and 7 respectively.

Mr. Dorwart regularly charges and is paid \$625 per hour for his work. Mr. DeMuro regularly charges and is paid \$560 per hour for his work. Mr. Leimbach regularly charges and is paid \$440 for his work. A summary of FDLaw's contemporaneous time records (after pre-billing review and adjustments) during the

period commencing October 2022 and ending July 15, 2024, attached as Exhibit 1, is set forth in the following table.^[1]:

Attorney	Billing Rate	Hours Billed	Dollars Billed
Frederic Dorwart	\$625	177.15	\$107,146.75
Paul DeMuro	\$585	671.05	\$381,913.00
David Leimbach	\$440	105.70	\$42,968.00
Richard Cipolla	\$425	17.30	\$7,232.00
TOTAL		971.2	\$539,259.75

Subject to entry of the Consent Decree by the Court, Lead Class Counsel will be Paul DeMuro, Frederic Dorwart, and David Leimbach; Messrs. Southerland and Wilkerson will be Co-Class counsel. Both Mr. Dorwart and Mr. DeMuro have substantial experience prosecuting and defending class actions. Messrs. Dorwart and DeMuro were *pro-bono* co-lead counsel in *DG v. Yarbrough*, WL 1343151 (N.D. Okla. 2013), which resulted in a settlement mandating fundamental reform of the Oklahoma foster care system—now nationally recognized as a model for foster care reform. Mr. Dorwart is Chairman of A Better Childhood, Inc., a national not-for-profit company conducting advocacy class action litigation to compel foster care reform nationally. Additionally, Messrs. Dorwart, DeMuro, and Leimbach, collectively, have represented parties (plaintiffs and defendants) in at least a dozen

^[1] The dollars billed are calculated using the FDLaw lawyers' hourly billing rates in effect from 2020 to the current date. The billing rates shown are the billing rates in effect since January 1, 2024. Time worked by all FDLaw lawyers other than Messrs. Dorwart, DeMuro, Leimbach, and Cipolla was charged off in the pre-billing review and adjustment. In total, \$22,494.50 of FDLaw work was charged off in the pre-billing review and, thus, excluded in the analysis set forth in this Supplemental Fee Motion.

class action cases in commercial matters, including oil and gas, securities, banking, insurance, and real estate matters.

Plaintiffs, If Prevailing, Will Be Entitled to Attorney Fees

Attorneys are entitled to fee awards under 42 U.S.C. § 1988 for prevailing claims which arise from civil rights acts such as those under 42 U.S.C. § 1983. Courts must, however, determine whether the requested fees are reasonable. Courts make this determination by calculating a “lodestar figure—the number of hours reasonably spent on the litigation, multiplied by a reasonable hourly rate.” *Hayes v. Chaparral Energy, LLC*, No. 14-CV-495-GKF-PJC, 2018 WL 10780611, at *4 (N.D. Okla. 2018) (citing *Malloy v. Monahan*, 73 F.3d 1012, 1017 (10th Cir. 1996)). The purpose of the lodestar determination is to produce an award “that *roughly* approximates the fee that the prevailing attorney would have received if he or she had been representing a paying client who was billed by the hour in a comparable case.” *Bishop v. Smith*, 112 F. Supp. 3d 1231, 1238–39 (N.D. Okla. 2015)(quoting *Perdue v. Kenny A.*, 559 U.S. 542, 551 (2010)).

Our research discloses that the two most recent cases in which this Court determined the reasonableness of hourly rates are *Bishop v. Smith*, 112 F. Supp. 3d 1231, 1238–39 (N.D. Okla. 2015), and *Busby v. City of Tulsa*, 2018 WL 7286180 (N.D. Okla. 2018). This Court approved \$400 per hour in 2015 (*Bishop v. Smith*), and in 2018 (*Busby v. City of Tulsa*). In 2020, visiting Judge Jim Browning, in *SFF-TIR, LLC v. Stephenson*, 452 F. Supp. 3d 1058 (N.D. Okla. 2020), a complex securities law matter, approved \$475 per hour for Mr. Dorwart and \$410 per hour for Mr. DeMuro.

Reasonableness of Plaintiffs' Attorney Fees¹

The 2015 \$400 rate approved by this Court (in *Bishop v. Smith*), when adjusted for inflation pursuant to the All Items CPI Index published by the United States Bureau of Labor,² equates to \$530 per hour today. The \$475 approved by Judge Browning for Mr. Dorwart (*SFF-TIR, LLC v. Stephenson*), when so adjusted for inflation, equates to \$605 per hour today. The \$410 per hour rate approved by Judge Browning for Mr. DeMuro in 2018, when adjusted, equates to \$522 per hour today. Thus, accepting the adjustment of fee rates solely for inflation, the current FDLaw rates have, for all practical purposes, been previously approved in the Northern District of Oklahoma for similarly complex matters:

2015 Judge Frizzell Approved Rate	\$400 per hour		2018 Judge Browning Approved Rates	\$475 (Dorwart) \$410 (DeMuro)
2015 Judge Frizzell Inflation Adjusted Approved Rate	\$540 per hour		2018 Judge Browning Inflation Adjusted Approved Rates	\$605 (Dorwart) \$522 (DeMuro)

In summary, following a trial of this matter, the Court will likely find that the Lodestar rates are the rates usually and customarily billed and collected by FDLaw and ODLC.

¹ Though the participation of ODLC attorneys was invaluable, we do not here discuss the reasonableness of ODLC's usual and customary hourly rates because: (i) ODLC's usual and customary rates are \$350 per hour for Mr. Wilkerson and \$200 per hour for Mr. Southerland, (ii) the ODLC lawyers worked 127.7 and are being paid only \$28,000, or only \$219.60 per hour under the provisions of the Consent Decree, and (iii) the reasonableness of ODLC's fees seems apparent on their face. See, Exhibit 8.

² See https://www.bls.gov/data/inflation_calculator.htm.

The First Period. For the First Period (from inception to the filing of the Consent Decree), the Consent Decree provides that the Department shall pay FDLaw lawyers \$275,000 and the ODLC lawyers \$28,000. These fees were negotiated with the Department and are substantially lower than the Lodestar rates.

During the First Period, FDLaw worked 971.2 hours (after pre-billing review and adjustments) at an average usual and customary billing rate of \$555.25. The effective hourly rate implied by the stipulated \$275,000 fee is \$283.15 ($\$275,000 \div 971.2$). This work included initial on-the-ground investigation; extensive consultations with experts; study of competency restoration policies and procedures in academia and the Federal and State Courts; the development, drafting and filing of the Complaint; collaborative field interviews with mental health providers, social service providers, prosecutors, defense lawyers, judges, and sheriffs; and extensive negotiations with the Department finalizing the Consent Decree. This work resulted in a state-of-the-art Consent Decree. Exhibit 1, FDLaw Time Records; Exhibit 8, Affidavit of Frederic Dorwart.

For this effort, resulting in the state-of-the-art Consent Decree, the \$275,000 fee to FDLaw which the Consent Decree provides yields an average hourly rate of \$283.15. This \$283.15 hourly rate is: (i) 51% of the usual and customary billing rates of FDLaw, (ii) 42% of the rates approved by this Court in 2015 and 2018, and (iii) 45% of the FDLaw rates approved by Judge Browning for Messrs. Dorwart and DeMuro in 2018. Clearly, the \$283.15 hourly rate stipulated in the Consent Decree is more than reasonable and fair.

Plaintiffs note that the Prison Litigation Reform Act (“PLRA”), when it applies, can constrain fee awards. *See* 42 U.S.C. § 1997e(d). Plaintiffs do not believe the PLRA applies to the proposed Consent Decree in this matter because this action does not concern “prison conditions,” but rather seeks to enforce putative class members’ constitutional right to receive timely competency restoration services from the Department.³ We have been unable to identify any case in which a court has held the PLRA applies in a competency-restoration class action such as the one before this Court. Additionally, the PLRA does not apply here because this action was not “brought by a prisoner who is confined to any jail, prison or other correctional facility,”

³ *Cf. Trueblood v. Washington State Dep’t of Soc. & Health Servs.*, 2016 WL 10703626, at *2 (W.D. Wash. Oct. 13, 2016) (holding that the “PLRA does not apply” because the lawsuit, which pertained to unconstitutional delays in competency evaluations and restorative services, was “not concerned with the ‘conditions’ of Plaintiffs’ confinement”); *Alabama Disabilities Advoc. Program v. Wood*, 584 F. Supp. 2d 1314, 1316 (M.D. Ala. 2008) (“The prospective-relief provisions of the PLRA do not apply because this action does not concern ‘prison conditions.’”); *Thomas v. Stitt*, 653 F. Supp. 3d 1084, 1088 (W.D. Okla. 2023) (finding PLRA inapplicable where the claims asserted “concern[ed] the constitutionality of Oklahoma’s parole procedures, not prison conditions or prison life.”); *but see Hunter v. Beshear*, 2018 WL 564856, at *16 n.5 (M.D. Ala. Jan. 25, 2018) (identifying, but finding it unnecessary to resolve, issue of whether PLRA applied to lawsuit regarding failures to provide timely competency restoration treatments).

but rather was brought by court-appointed legal guardians as next friends on behalf of four individuals who had been found incompetent.⁴

The Court need not, however, consider whether the PLRA applies and the Plaintiffs do not ask it to do so because the fee provisions in the Consent Decree are reasonable even assuming, *arguendo*, the PLRA does apply.⁵

Under the PLRA, the baseline hourly attorney rate is currently \$258 per hour; calculated by multiplying the current CJA counsel rate of \$172 under 42 U.S.C. § 1997e(d)(3)), by 150%. Under the PLRA, the Lodestar amount may be enhanced by the Court.⁶ The \$283.15 per hour rate provided during the First Period would be an enhancement of only 9% over the PLRA Lodestar amount. This *de minimis* enhancement of Plaintiffs' attorney fees during the First Period is reasonable for this

⁴ *Cf. Trueblood*, 2016 WL 10703626, at *2 (holding that fee award was “not governed by the PLRA” where one of the plaintiffs was a disability rights non-profit that litigated “on behalf of its constituents”); *Tretter v. Pa. Dep't of Corr.*, 558 Fed. App'x. 155, 157–58 (3d Cir. 2014) (refusing to apply PLRA limitations to administrator of prisoner's estate); *Rivera-Rodriguez v. Pereira-Castillo*, 2005 WL 290160, at *5 (D.P.R. Jan. 31, 2005) (“[T]he language of the statute under §§ 1997e(a) [sic] or 1997e(h) does not encompass the family members or legal guardians of a prisoner.”); see generally Deborah Frisch, *Not Behind Bars, Not A Prisoner: An Analysis of Guardians, Conservators, and Protection & Advocacy Organizations Under the Prison Litigation Reform Act*, 36 Cardozo L. Rev. 731, 761 (2014) (“In analyzing the history and reasons for enactment of the PLRA, it is apparent that these groups that stand in for prisoners were never intended to be seen as ‘prisoners’ within the meaning of the statute and should not be subject to the statute when bringing a case on behalf of an inmate.”).

⁵ Plaintiffs expressly reserve the PLRA issue for later determination in the event the Consent Order is not entered.

⁶ Enhancement of the PLRA Lodestar may be awarded by the Court. *Kelly v. Wengler*, 822 F. 3d 1085 (9th Cir. 2016).

complex class action in which Plaintiffs have achieved a state-of-the-art Consent Decree that reforms a constitutionally required state-wide program.

Second Period. For the Second Period, the Consent Decree provides that Class Counsel will be paid \$350 per hour – which is substantially less than both: (i) the lodestar rate determined by the rates usually billed and collected by FDLaw (\$625 for Mr. Dorwart and \$585 for Mr. DeMuro), and (ii) the lodestar rate determined by either the 2015 CPI adjusted rate (\$540) or the 2018 CPI adjusted (\$605 for Mr. Dorwart and \$522 for Mr. DeMuro).

The \$350 per hour rate during the Second Period is an enhancement of only 36% of the \$258 PLRA lodestar rate. The efforts of FDLaw and the result obtained by FDLaw, discussed *supra*, p. 3, justify this enhancement.

Third Period. For the Third Period, the Consent Decree provides that Class Counsel will be paid \$325 per hour capped at \$75,000 a year. Again, the \$325 per hour rate is substantially less than both: (i) the rates usually charged and collected by FDLaw (\$625 for Mr. Dorwart and \$585 for Mr. DeMuro), and (ii) the rates determined by either the 2015 CPI adjusted rate (\$540) or the 2018 CPS adjusted rate (\$605 for Mr. Dorwart and \$522 for Mr. DeMuro). The \$325 per hour rate provided by the Consent Decree in the Third Period (capped at \$75,000 per year) is an enhancement of only 30% of the PLRA Lodestar fee of \$258. The efforts of FDLaw and result obtained by FDLaw discussed above at p. 3 above, justifies this enhancement. In actuality, the hourly rate to be paid FDLaw in the Third Period will

likely be significantly less than the PLRA lodestar rate of \$258 due to the \$75,000 cap.

The fee provisions of the Consent Decree in the Third Period are reasonable.

Conclusion

The fee provisions of the Consent Decree are reasonable for each of the Three Periods. It is apparent that the fees embodied in the Consent Decree were negotiated fees unrelated to the value of the lawyer services provided and at rates a fraction of those the Plaintiffs will likely recover if they prevail at trial.

RESPECTFULLY SUBMITTED,

/s/ Frederic Dorwart

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Frederic Dorwart, OBA No. 2436
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 26th day of July, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the applicable ECF registrants.

/s/ Frederic Dorwart_____

Exhibit 1

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 11/1/2022
 Invoice No: 148883

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
10/11/2022 PD	Emails with Ms. Santee and others to set up meeting for due diligence	0.50	530.00	265.00
10/17/2022 PD	Prepare for and meet with Brittney Hayes, Director of Policy Research and Engagement, of Healthy Minds Policy Initiative.	1.00	530.00	530.00
			Subtotal Fees:	\$795.00
			Contingent:	(795.00)

Rate Summary		
Paul DeMuro	1.50 hours at \$530.00/hr	795.00
Total hours:	1.50	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
 Acct. Name: Frederic Dorwart, Lawyers PLLC
 Bank: Bank of Oklahoma
 Account #312977868
 Routing #103900036

Credit/Debit:
<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 12/1/2022
 Invoice No: 148884

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees

		Hours	Rate	Amount
11/01/2022 DWL	Confer with Mr. DeMuro regarding case overview (0.3); preliminary research regarding potential theories and causes of action (1.5).	1.80	400.00	720.00
			Subtotal Fees:	\$720.00
			Contingent:	(720.00)

Rate Summary		
David W. Leimbach	1.80 hours at \$400.00/hr	720.00
Total hours:	1.80	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
 Acct. Name: Frederic Dorwart, Lawyers PLLC
 Bank: Bank of Oklahoma
 Account #312977868
 Routing #103900036

Credit/Debit:
<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 2/1/2023
 Invoice No: 148885

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
01/04/2023	KN Attention to emails and calls with Mr. DeMuro. [NO CHARGE]	0.00	355.00	No Charge
01/04/2023	PD Emails with Mr. Brewster regarding new issues at jail and review his materials; conference call regarding same and how to get case moving; confer with Ms. Neal regarding obtaining legislative hearing transcripts.	1.50	560.00	840.00
01/05/2023	KN Attention to call with Senator Jo Anna Dosset's office regarding hearing transcript; emails with Mr. DeMuro regarding the same; call with Jackson Technical regarding downloading hearing videos; emails with Mr. DeMuro regarding the same. [NO CHARGE]	0.00	355.00	No Charge
01/05/2023	PD Continue due diligence on fact investigation.	0.50	560.00	280.00
01/06/2023	PD Continue to work with Mr. Brewster regarding background facts; telephone conference with Ms. Rosenfeld regarding pro bono support from NY firm.	1.00	560.00	560.00
01/09/2023	KN Attention to email to Mr. Ramsey regarding hearing videos. [NO CHARGE]	0.00	355.00	No Charge
01/10/2023	CVW Review and respond to emails from Mr. DeMuro; research Kansas case (Glendening v. Howard - 22-CV-4032) and Colorado case (Center for Legal Advocacy v. Bicha - 11-CV-2285) and pull various case documents as requested by Mr. DeMuro.	0.50	245.00	122.50
01/10/2023	CVW Review and respond to emails from Mr. DeMuro, review and organize various documents related to potential class members, research, press articles, and competency log.	0.40	245.00	98.00
01/10/2023	DWL Confer with Mr. DeMuro regarding potential class action and attention to emails regarding same.	0.60	400.00	240.00
01/10/2023	PD Confer with Mr. Brewster regarding his latest jail visit; email with firm regarding strategy meeting; confer with Mr. Leimbach regarding case overview and his participation.	1.00	560.00	560.00
01/11/2023	PD Emails with Ms. Rosenfeld regarding possible mass habeas.	0.50	560.00	280.00
01/13/2023	DWL Review filings from similar cases in other states (1.5); meet with Messrs. DeMuro and Brewster and Ms. LaFortune and visit detainees at David L. Moss jail (2.2).	3.70	400.00	1,480.00

01/13/2023	PD	Continue to research similar competency cases; meet with Mr. Brewster and Mrs. Kathy LaFortune to discuss issues at the jail; visit mental health pod at jail with Mr. Brewster and Mr. Leimbach.	3.50	560.00	1,960.00
01/16/2023	KN	Attention to emails with Mr. DeMuro regarding mental health report. [NO CHARGE]	0.00	355.00	No Charge
01/16/2023	PD	Due diligence on factual and legal basis for claims; review Oklahoma Applesseed report on competency and related citations; review Kansas case filings and related research.	5.50	560.00	3,080.00
01/17/2023	KN	Attention to call with Mr. DeMuro regarding open records request. [NO CHARGE]	0.00	355.00	No Charge
01/17/2023	PD	Continue due diligence on complaint: work on finding personal representatives; telephone conference with Mr. Ryan Ray; emails with Mr. Brewster regarding same (1); email to OK Advocacy law center regarding resources and support (.25); listen to Oct. 2022 OK legislative hearings on mental health issues and annotate (1.5); begin drafting complaint (1); confer with Mr. Walton and Mr. Dorwart regarding moving forward with pro bono case and outlining strategy (.5).	4.25	560.00	2,380.00
01/18/2023	CVW	Review and edit draft letter Heather Hawkins with Oklahoma Department of Mental Health & Substance Abuse regarding Open Records Act request; confer with Mr. DeMuro regarding same.	0.30	245.00	73.50
01/18/2023	PD	Continue due diligence in preparing complaint: telephone conference with possible Personal Representative, Hank Meyer; research, draft, edit, and serve Open Records Request to OKDMHSA; continue to research legal standards; set up meeting with Oklahoma Disability Law Center and with Applesseed of Oklahoma; confer with Mr. Dorwart regarding all of the above.	5.00	560.00	2,800.00
01/19/2023	CVW	Conference with Mr. DeMuro regarding electronic files from Public Defender's office regarding potential class action members; download and organize same.	0.30	245.00	73.50
01/19/2023	PD	Continue due diligence in researching complaint and possible Personal Representative; research recent jail death while awaiting competency evaluation; continue to draft complaint; confer with Mr. Brewster regarding all of above.	3.75	560.00	2,100.00
01/20/2023	CVW	Research public statements made by Sheriff Regalado and other lawmakers regarding mental health treatment, or non-treatment, in Oklahoma jails and prisons; email to Mr. DeMuro regarding findings.	0.50	245.00	122.50
01/20/2023	PD	Continue due diligence on complaint; draft introduction and section on OK competency procedure; Zoom call with OK Legal Aid to ask for their support and input; emails with Mr. Brewster regarding OKC list.	2.50	560.00	1,400.00
01/23/2023	CVW	Research Utah federal cases; pull various dockets and various case filings; emails with Mr. DeMuro regarding same.	0.50	245.00	122.50
01/23/2023	PD	Continue due diligence on complaint; draft introduction and section on OK competency procedure; research Utah and Alaska similar cases; meet with Alison Ferguson, possible contract help; emails with Corbin Brewster regarding contact with OIDS and Public Defender in OKC, and related emails.	3.50	560.00	1,960.00
01/24/2023	CVW	Review and respond to emails with Mr. DeMuro; edit and format draft class action complaint.	0.50	245.00	122.50
01/24/2023	PD	Continue due diligence on complaint; continue to work on introduction and section on OK competency procedure; research Utah case (1.5); meet with Applesseed team to discuss their support and how we can work together, and the legislative issues (2).	3.50	560.00	1,960.00

01/25/2023	PD	Continue due diligence on complaint; multiple telephone conferences with Mr. Brewster regarding finding named plaintiff in Tulsa County; communications with Tulsa County DA to set up meeting, and Kathy LaFortune, regarding possible experts.	2.00	560.00	1,120.00
01/26/2023	PD	Continue due diligence on complaint: continue to research other similar cases; due diligence on experts by consulting Kathy LaFortune and Appleseed; work on getting GAL from Appleseed; telephone conference with Akin Gump for possible support; emails with OK Disability law regarding getting them on board; telephone conference with Tim Laughlin from OIDS regarding his view of the issues.	3.50	560.00	1,960.00
01/27/2023	DWL	Confer with Mr. DeMuro regarding research issues for potential class action (0.3); conduct preliminary research on issues (0.6).	0.90	400.00	360.00
01/27/2023	PD	Continue to due diligence on complaint and expert presentation, setting up call with Neil Gowen Smith; telephone conference with OK County Chief Public Defender, Bob Rabitz, regarding competency problem in OKC jail and possible named plaintiff candidates; emails and telephone conference with Corbin Brewster regarding CFS claiming it is performing restorative care in jail	3.00	560.00	1,680.00
01/28/2023	PD	Emails with Colleen McCurty regarding possible named plaintiffs.	0.50	560.00	280.00
01/30/2023	CVW	Research three potential class members in Oklahoma County - Rudy Williams, Victor Morgan, and Ahmad Mateen; pull docket sheets; research Okmulgee district court records for Brandon Lee Powders and pull docket sheet; emails with Mr. DeMuro regarding same.	0.70	245.00	171.50
01/30/2023	PD	Continued due diligence on named plaintiffs with Kathy LaFortune and Mr. Brewster (1); research potential experts on competency issues and telephone conference with Neil Gowensmith and his team regarding potential engagement (1.5).	2.50	560.00	1,400.00
01/31/2023	FD	Attention to mental competency class action including multiple emails to Messrs. Walton and DeMuro and teleconference with Mr. Walton regarding same. [NO CHARGE]	0.00	595.00	No Charge
01/31/2023	PD	Work on FDL expense estimate and confer with Executive Committee members regarding same. [NO CHARGE]	0.00	560.00	No Charge
				Subtotal Fees:	\$29,586.50
				Contingent:	(29,586.50)

Rate Summary		
Paul DeMuro	47.50 hours at \$560.00/hr	26,600.00
Frederic Dorwart	0.00 hours at \$595.00/hr	No Charge
David W. Leimbach	5.20 hours at \$400.00/hr	2,080.00
Kelsey Neal	0.00 hours at \$355.00/hr	No Charge
Chantel Wilson	3.70 hours at \$245.00/hr	906.50
Total hours:	56.40	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:

Acct. Name: Frederic Dorwart, Lawyers PLLC
Bank: Bank of Oklahoma
Account #312977868
Routing #103900036

Credit/Debit:

<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 3/1/2023
 Invoice No: 148886

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
02/01/2023 FD	Conference and emails with Messrs. Walton and DeMuro respecting terms of undertaking jail competency class action. [NO CHARGE]	0.00	595.00	No Charge
02/01/2023 PD	Continue work on due diligence for research for complaint: research criminal cases of incompetent defendants for possible named plaintiffs (2); conference with Appleseed regarding retaining them as non-testifying consultant (.5); emails with potential expert, Neil Gowensmith, regarding his status with retention agreement; setting up calls with possible next friends and call with Mr. Meyer regarding his role as next friend (.5).	3.00	560.00	1,680.00
02/02/2023 CVW	Review Indiana case (Indiana Protection and Advocacy Services Commission v. Indiana Family & Social Services, et al); download docket sheet, complaint, answer, and numerous other filings; emails with Mr. DeMuro and Mr. Leimbach regarding same.	0.50	245.00	122.50
02/02/2023 DWL	Confer with Mr. DeMuro regarding issues regarding naming proper defendants (0.2); Zoom with co-counsel regarding case strategy (0.6); exchange emails with co-counsel regarding experts, plaintiffs, and related issues (0.5); begin researching legal issues for potential action (2.5).	3.80	400.00	1,520.00
02/02/2023 FD	Multiple emails with Mr. DeMuro and cooperating parties discussing proposed class action; conference with Mr. DeMuro respecting same.	0.60	595.00	357.00
02/02/2023 PD	Continue due diligence on investigation and complaint preparation: telephone conference with Oklahoma Disability Law Center regarding co-counsel arrangement, division of labor, and investigating rural counties situations (1); review expert's proposed engagement letter and material, and recommend execution (.5); review Indiana case denying preliminary injunction; discuss with Mr. Leimbach (.5); telephone conference and related emails with Mr. Kunzweiler regarding proposed SB 552; review bill and emails with Appleseed regarding same (.75); emails with ACLU team in Kansas litigating similar case in Kansas, and setting up conference call (.25).	3.00	560.00	1,680.00
02/03/2023 DWL	Attention to emails regarding experts, named plaintiffs, and related issues (0.3); read briefing and decisions from related cases in other states (0.9).	1.20	400.00	480.00

02/03/2023	PD	Continue due diligence of finding named plaintiffs: telephone conference with Appleseed group regarding same; review Tulsa County list; emails and telephone conference with OCK, Tulsa County Public Defender, and OIDS (2); work on expert due diligence researching possible experts (1); drafting complaint (1).	4.00	560.00	2,240.00
02/05/2023	DWL	Conduct preliminary Westlaw research on potential abstention, exhaustion of remedies, Eleventh Amendment, and related issues (3.8); email summary of preliminary analysis to Mr. DeMuro (0.6).	4.40	400.00	1,760.00
02/05/2023	PD	Review and comment on Mr. Leimbach's memo on abstention.	0.75	560.00	420.00
02/06/2023	CVW	Research dockets for Kansas, Colorado and Indiana cases for status; emails with Mr. DeMuro regarding same.	0.20	245.00	49.00
02/06/2023	DWL	Confer with Mr. DeMuro regarding abstention and related issues.	0.30	400.00	120.00
02/06/2023	PD	Continue due diligence on named plaintiffs; telephone conference and emails with Kathy LaFortune and Appleseed; continue due diligence on legal standards for abstention and 11th amendment immunity issues.	2.00	560.00	1,120.00
02/07/2023	PD	Continue due diligence on selecting named plaintiffs: review summary of potential NP's from Appleseed and Ms. LaFortune; respond with input and questions; telephone conference and emails with next friend, Hank Meyer, regarding honing in on OKC named plaintiff (2); research OK competency statutes for drafting that section of complaint; drafting work on same (1.5).	3.50	560.00	1,960.00
02/08/2023	DWL	Zoom with Mr. DeMuro and consulting experts regarding new engagement (0.6); confer with Mr. DeMuro regarding same (0.2).	0.80	400.00	320.00
02/08/2023	PD	Continue due diligence on finding named plaintiffs: review Appleseed's draft summaries of three potential named plaintiffs and edit; related emails to OIDS and OKC next friend (2); continue drafting complaint completing description of OK competency statutes (1.5); first working session meeting via Zoom with expert group Groundswell on framing the issues and getting them data (1).	4.50	560.00	2,520.00
02/09/2023	DWL	Confer with Mr. DeMuro regarding planning lawsuit (0.2); Zoom with co-counsel to coordinate tasks (0.4); attention to emails with co-counsel regarding same (0.3).	0.90	400.00	360.00
02/09/2023	PD	Continue due diligence on complaint preparation: prepare for and attend call with co-counsel, OK Disability Law Center, regarding connecting with national resources (1); prepare for and attend call with Appleseed team regarding named plaintiff candidates and drafting summary for complaint (.75); emails with other next friends regarding possible named plaintiffs (.5); emails with Mr. Gowensmith regarding same and attaching Phase I due diligence material for their review (.75).	3.00	560.00	1,680.00
02/10/2023	PD	Continue to draft complaint, nature of case, and parties and possible named plaintiff sections, and section on OKC competency (3); emails with team regarding one named plaintiff dropping out because of being mooted (.5).	3.50	560.00	1,960.00
02/13/2023	PD	Continue to draft complaint, nature of case, and parties and possible named plaintiff sections, section on OKC competency, and cross reference Kansas complaint for potential additional 1983 allegations.	3.50	560.00	1,960.00
02/14/2023	DWL	Confer with Mr. DeMuro regarding research assignment in connection with potential state constitutional claim (0.2); attention to emails with co-counsel and experts (0.3).	0.50	400.00	200.00
02/14/2023	FD	Multiple emails with Mr. DeMuro and others concerning report respecting numbers in jail.	0.40	595.00	238.00

02/14/2023	PD	Continue drafting complaint and substituting new class reps for mooted defendants; editing due process claim (2); conference call with Appleseed regarding same (.5); review OIDS competency waitlist and emails regarding same (.5); address DMH questionable response to Appleseed open records request and remarkable claim that there is no waiting list, triggering new discussions with Mr. Brewster, Ms. LaFortune, Appleseed, and OK Public Defender (1.5).	4.50	560.00	2,520.00
02/15/2023	CVW	Review and respond to numerous emails with Mr. DeMuro; organize various case documents, including potential class members and waiting lists.	0.50	245.00	122.50
02/15/2023	DWL	Conduct Westlaw research on substantive due process under state constitution and email analysis to Mr. DeMuro (2.6); Zoom with co-counsel regarding case planning (0.5); Zoom with Mr. DeMuro, Ms. Santee, and Ms. Elyazgi regarding public relations issues (0.8).	3.90	400.00	1,560.00
02/15/2023	FD	Multiple emails concerning Groundswell Services proposal. [NO CHARGE]	0.00	595.00	No Charge
02/15/2023	PD	Continue to deal with reaction to DMH false open records requests response; confer with Mr. Rabitz and Mr. Laughlin, and Mr. Brewster to confirm competency waitlist still exists (1.5); telephone conference with Oklahoma Disability law co-counsel on same and status report on complaint preparation (.5); telephone conference with Saxon and Amy Santee regarding press strategy (.5); continue to edit complaint (1.5); review Mr. Leimbach's memo on OK State substantive due process (.25).	4.25	560.00	2,380.00
02/16/2023	CVW	Review, edit, and format draft Complaint; review local rules for Northern District; conference and emails with Mr. DeMuro regarding same.	1.20	245.00	294.00
02/16/2023	DWL	Attention to emails with co-counsel regarding appointment of guardians ad litem.	0.30	400.00	120.00
02/16/2023	PD	Continue to draft complaint, working on class action allegations and incorporating Department's open records request; rework named plaintiffs as former ones drop out (2.5); work on securing next friends for named plaintiffs in OKC and OIDS counties via conference with attorneys in those districts (1); conference with ODLC regarding research on motion for GAL in criminal case and confer with Appleseed regarding same (1); conference with Mr. Leimbach regarding state due process clause (.25).	4.75	560.00	2,660.00
02/17/2023	CVW	Review and edit next draft of Complaint; confer with Mr. DeMuro regarding same.	0.50	245.00	122.50
02/17/2023	DWL	Review memo and motion prepared by Disability Law for GAL appointment (0.3); conduct Westlaw research on appointment of guardian ad litem issues (2.0); exchange emails with Mr. DeMuro regarding same (0.5); Zoom with Mr. DeMuro and Ms. Briggs regarding identification of named plaintiffs (0.4); revise draft motion for appointment of GAL (0.5); revise draft Complaint and exchange emails with Mr. DeMuro regarding same (2.9).	6.60	400.00	2,640.00
02/17/2023	JMM	Office conference with Mr. DeMuro to review class action complaint. [NO CHARGE]	0.00	405.00	No Charge
02/17/2023	PD	Continue to draft complaint: finish first draft after adding state due process claim and section on DMH misleading list management; edit entire draft; conference with Mr. Leimbach and Mr. Medina regarding their suggestions (3); conference with Appleseed regarding Ms. Briggs visit to jail regarding her next friends and strategy going forward (.5); emails with Mr. Meyer and Mr. Watson regarding same (.5); conference with Mr. Brewster regarding getting next friends appointed as GAL; work on GAL motion and papers to distribute to other next friends (2).	6.00	560.00	3,360.00

02/18/2023	FD	Email to Mr. DeMuro concerning First Final Complaint.	0.25	595.00	148.75
02/18/2023	PD	Emails with Mr. Brewster regarding his comments to draft complaint.	0.25	560.00	140.00
02/20/2023	FD	Emails with Mr. Meyer's concerning complaint; review and comment on proposed complaint.	0.80	595.00	476.00
02/20/2023	PD	Work on editing complaint, incorporating Mr. Dorwart's and others comments (.75); emails and telephone conferences with next friends including Evan Watson and Leslie Briggs regarding GAL motion; emails to Mr. Brewster regarding process to get GAL appointed (.75).	1.50	560.00	840.00
02/21/2023	FD	Conference with Mr. DeMuro regarding F&CS announcement of services to jail; teleconference with Ms. Gail Lapidus respecting same; conference with Mr. DeMuro concerning status.	0.80	595.00	476.00
02/21/2023	PD	Work on getting GAL appointed in Tulsa, and communicating GAL orders to other next friends and co-counsel; edit draft complaint accordingly.	1.50	560.00	840.00
02/22/2023	CVW	Edit draft complaint; confer with Mr. DeMuro regarding same.	0.40	245.00	98.00
02/22/2023	DWL	Attention to emails with co-counsel regarding draft complaint and appointment of GALs (0.2); confer with Mr. DeMuro regarding potential ADA claim (0.2); preliminary research regarding same (1.0).	1.40	400.00	560.00
02/22/2023	FD	Email to Ms. Lapidus regarding F&CS mental health services to Jail.	0.25	595.00	148.75
02/22/2023	PD	Continue to work on getting next friends appointed as GAL in OKC and OIDS counties; multiple telephone conferences and emails with Mr. Watson and Mr. Meyer; review Mr. Redelk's file (2); research possible ADA claim after conferring with Appleseed team (1); edit complaint to add ADA claim; draft and incorporate comments from Appleseed (1).	4.00	560.00	2,240.00
02/23/2023	CVW	Research service address for defendants; emails with Mr. DeMuro regarding same; prepare Summons for Defendants; begin preparing Civil Cover Sheet	0.50	245.00	122.50
02/23/2023	DWL	Research service of process issues and exchange emails with Mr. DeMuro regarding same (2.5); exchange emails with Mr. DeMuro regarding potential ADA claim (0.5); review additional literature for fact development and exchange emails with Mr. DeMuro regarding same (1.0).	4.00	400.00	1,600.00
02/23/2023	FD	Multiple emails regarding preparation for filing complaint including emails respecting Ms. Lapidus and F&CS services.	0.40	595.00	238.00
02/23/2023	PD	Continue to work on draft complaint: ADA research; draft ADA claim (2); conference with Mr. Brewster regarding FCS issues in Tulsa County Jail; related emails with Mr. Dorwart regarding same (1.5).	3.50	560.00	1,960.00
02/24/2023	CVW	Edit and format draft Complaint; emails with Mr. DeMuro regarding same.	0.50	245.00	122.50
02/24/2023	DWL	Research potential ADA claim and exchange emails with Mr. DeMuro regarding same (2.7); attention to emails with co-counsel and PR consultant (0.2).	2.90	400.00	1,160.00
02/24/2023	FD	Multiple emails to Ms. Lapidus regarding F&CS activities under new contract; attention to upgraded version of complaint; multiple emails respecting guardianship status for class representatives.	1.20	595.00	714.00
02/24/2023	PD	Continue to work on draft complaint: drafting ADA claim and editing rest (2); telephone conferences with private attorneys in Tulsa County with defendants on competency lists (.5); telephone conference with Evan Watson regarding his GAL appointment (.5).	3.00	560.00	1,680.00
02/26/2023	FD	Multiple emails regarding finalization of guardianships and complaint.	0.40	595.00	238.00

02/26/2023	PD	Work on third draft complaint - edit entire complaint, research ADA issues, and edit prayer sections (3); emails to Next Friends re status of complaint and desire for OKC defendant (1); edit Saxon's proposed press release (.5)	4.50	560.00	2,520.00
02/27/2023	FD	Multiple emails regarding Hank Meyer appointment as guardian and runup to filing; emails respecting F&CS announcement concerning in jail presence.	0.40	595.00	238.00
02/27/2023	FD	Attention to special entry of appearance for sanctions hearing.	0.30	595.00	178.50
02/27/2023	PD	Work on third draft complaint - edit entire complaint with Mr. Cipolla's and others comments, begin to add summary on OKC plaintiff (2.5); emails with next friend re details of their clients and procedure for filing (.5); finalize edits to press release and emails with Saxon regarding same (.5); telephone conference with Kansas ACLU team which is handling similar suit in Kansas (.5); review OKC GAL orders and confer with Mr. Meyer regarding same (.5); emails to PD's in Tulsa and OKC and OIDS regarding numbers awaiting restorative care (.5)	5.00	560.00	2,800.00
02/27/2023	RJC	Attention to email from Mr. DeMuro forwarding draft client complaint version 4 for proofreading; telephone conference with Mr. DeMuro regarding same; proofreading and editing same in redlined and clean formats to incorporate recommended client revisions and create client draft version 5; telephone conference with Mr. DeMuro regarding same; drafting email to Mr. DeMuro forwarding same for review; attention to 2 emails from, and drafting 2 emails to, Mr. DeMuro regarding same.	3.90	405.00	1,579.50
02/28/2023	DWL	Revise draft complaint and send edits and comments to Mr. DeMuro (1.0); revise draft ancillary filings and coordinate with Ms. Caywood regarding same (0.5); attention to emails with co-counsel (0.4).	1.90	400.00	760.00
02/28/2023	FD	Review final estoppel version of complaint; email to Ms. Santee and Mr. Levit regarding same; emails to Ms. Lapidus respecting same; attention to affiliated filings for commencement of action; attention to question whether to identify named plaintiffs' race.	0.70	595.00	416.50
02/28/2023	PD	Continue to work on last draft of complaint, adding other's comments and redlines, fact checking criminal files for named plaintiff (2); separate calls with Kathy LaFortune and Mr. Brewster re CFS new services in jail (.5); emails with various defense attorneys to confirm numbers awaiting restoration services (1); work on editing press release and related emails (1).	4.50	560.00	2,520.00

Subtotal Fees: \$63,340.50

Contingent: (63,340.50)

Rate Summary		
Richard J. Cipolla	3.90 hours at \$405.00/hr	1,579.50
Paul DeMuro	78.00 hours at \$560.00/hr	43,680.00
Frederic Dorwart	6.50 hours at \$595.00/hr	3,867.50
David W. Leimbach	32.90 hours at \$400.00/hr	13,160.00
J. Michael Medina	0.00 hours at \$405.00/hr	No Charge
Chantel Wilson	4.30 hours at \$245.00/hr	1,053.50
Total hours:	125.60	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
Acct. Name: Frederic Dorwart, Lawyers PLLC
Bank: Bank of Oklahoma
Account #312977868
Routing #103900036

Credit/Debit:
<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 4/1/2023
 Invoice No: 148902

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount	
03/01/2023	DWL	Revise complaint and ancillary documents (1.3); review procedural rules related to commencing new action (0.9); direct and coordinate with Ms. Caywood regarding filing of lawsuit (1.4); confer with Mr. DeMuro regarding same (0.4); search for service of process contact information (0.4); telephone call with and email to Ms. Parent at ODMHSAS regarding service and exchange emails with Messrs. Dorwart and DeMuro regarding same (1.0).	5.40	400.00	2,160.00
03/01/2023	FD	Attention to commencement of action filings; emails x3 with Ms. Lapidus regarding same; email to Ms. Santee and Mr. Levit respecting same; multiple emails with Messrs. Leimbach and DeMuro concerning commencement of action.	1.60	595.00	952.00
03/01/2023	PD	Final proofread and edits to complaint (2.5); review summons, cover sheet, and supporting filing documents; supervise filing (1); distribute complaint to next friends and others with messages and explaining next steps (1); emails with team regarding methods of service on defendants (.5)	5.00	560.00	2,800.00
03/02/2023	DWL	Further research on service of process issues and exchange emails with Mr. DeMuro regarding same (1.2); attention to emails with co-counsel and media coverage (0.8); telephone call with stepmother of potential class member and exchange emails with Mr. DeMuro regarding same (1.2).	3.20	400.00	1,280.00
03/02/2023	FD	Multiple emails to Messrs. DeMuro and Leimbach, Ms. Santee, and others reservice of process, discovery tools, and related matters.	0.60	595.00	357.00
03/02/2023	PD	Telephone conferences with Mr. Brewster regarding DMH claim of providing restoration services (.5); research definition of restoration services (.5); field press inquiries regarding complaint (.5); emails with team and regarding service issues (.5); discussion with ODLC regarding sharing complaint and fielding press inquiries (.5); conference with Ms. Santee regarding data culling project to create data base from OSCN of all competency cases (.75).	3.25	560.00	1,820.00
03/03/2023	DWL	Emails to Ms. Parent at ODMHSAS regarding service of process and related issues (0.5); exchange emails with Ms. Ladson (stepmother of potential class member) regarding fact development (0.6).	1.10	400.00	440.00
03/03/2023	FD	Attention to service of summons and complaint; attention to Interview of Tinesha Ladson.	0.60	595.00	357.00

03/03/2023	PD	Telephone conferences and emails with defense lawyers and concerned family members regarding possible in jail restoration claims as applied to certain Class members (1); emails with expert team to discuss next steps (.5); conference with Mr. Leimbach to explore early discovery options and research rules regarding same (1).	2.50	560.00	1,400.00
03/06/2023	JMM	Westlaw research early discovery issue. [NO CHARGE]	0.00	405.00	No Charge
03/06/2023	PD	Conference with Mr. Brewster regarding contempt proceedings in criminal cases as way of learning what's going on in the jail (.25) prepare for and attend media session with Ch. 5 in OKC (.75).	1.00	560.00	560.00
03/07/2023	FD	Conference with Ms. Lapidus discussing F&CS and its work in the jail; teleconference with Mr. DeMuro respecting same; email to Mr. Levit concerning FDLaw complaint.	0.50	595.00	297.50
03/07/2023	JMM	Westlaw -Expedite discovery issue. [NO CHARGE]	0.00	405.00	No Charge
03/07/2023	PD	Emails and conference with Mr. Dorwart regarding engaging FCS (.25); telephone conference with private attorney with client in class and strategies to get info from DMH (.25); emails with Appleseed regarding open records lawsuit (.25); telephone conference with Mr. Sutherland regarding OKC proceedings and getting transcripts (.25); emails and conference with team regarding perfecting service on defendants (.5); set up Zoom meeting with expert (.25).	1.75	560.00	980.00
03/08/2023	DWL	Draft affidavit of service (0.2); exchange emails with Mr. DeMuro and with defendants' counsel regarding service of process (0.5).	0.70	400.00	280.00
03/08/2023	JMM	Westlaw expedite discovery. [NO CHARGE]	0.00	405.00	No Charge
03/08/2023	PD	Meet with Mr. Brewster to discuss intervening in criminal cases to examine DMH witnesses (1); emails and telephone conference with Appleseed regarding open records lawsuit and confer with Ms. Ferguson regarding same (.5); emails with Disability Law Center to coordinate expert conference (.25); emails with team related to service of process (.25); emails with Mr. Meyer setting up protocol for handling public inquires (.25); emails with Ms. Santee and Brek Wilkins regarding OSCN data culling project (.25).	2.50	560.00	1,400.00
03/09/2023	FD	Multiple emails concerning acceptance of service and agreed response date.	0.25	595.00	148.75
03/09/2023	PD	Prepare for and attend Zoom call with experts Groundswell to help with discovery questions (1); work on service issues securing agreement for service (1).	2.00	560.00	1,120.00
03/10/2023	JMM	Office conference with Mr. DeMuro; Review cases. [NO CHARGE]	0.00	405.00	No Charge
03/10/2023	PD	Emails with Ms. Santee regarding data culling project.	0.50	560.00	280.00
03/12/2023	PD	Receive expert's report on questions for cross exam of Department on jail restoration.	0.50	560.00	280.00
03/13/2023	FD	Emails to Mr. DeMuro concerning experts and scheduling teleconference.	0.25	595.00	148.75
03/13/2023	JMM	Review expedited discovery cases. [NO CHARGE]	0.00	405.00	No Charge
03/14/2023	DWL	Attention to email with opposing counsel regarding request for extension of deadline to respond to complaint; exchange emails with Mr. DeMuro regarding same	0.50	400.00	200.00
03/14/2023	FD	Email requesting extension of time to respond to complaint; emails with Mr. DeMuro discussing experts and F&CS interview; emails with Tracy Neal regarding early limited discovery.	0.30	595.00	178.50

03/14/2023	PD	Review updates on NP cases (.25); confer with Corbin Brewster regarding next steps in district court cases (.5); prepare for BS hearing; conference with Mr. Leimbach regarding strategy; emails with Nick Southerland regarding same (.5); work on open records request lawsuit; emails with research assistant and GAL on status of open records lawsuit (1).	2.25	560.00	1,260.00
03/14/2023	PD	Continue to work on brief; edit and cite check first final draft; confer with Mr. Dorwart regarding same; incorporate his redlines and comments; circulate to team for comments	4.50	560.00	2,520.00
03/15/2023	DWL	Confer with Mr. DeMuro regarding early discovery and case schedule issues (0.4); participate in call with defendants' counsel regarding same (0.2); draft and revise early document requests and deposition topics and exchange emails with co-counsel regarding same (1.5).	2.10	400.00	840.00
03/15/2023	FD	Multiple emails with Mr. DeMuro and Ms. Tracy Neal regarding early discovery and setting teleconference to discuss early discovery and an extension of response time.	0.30	595.00	178.50
03/15/2023	JMM	Prepare e-mail and review expedited discovery case. [NO CHARGE]	0.00	405.00	No Charge
03/15/2023	PD	Telephone conference with defense counsel regarding their request for answer extension and our counter for early discovery; debrief with co-counsel and respond to AGs confirming email (1); draft, edit, and send early discovery letter to AG (1.5).	2.50	560.00	1,400.00
03/16/2023	DWL	Attention to emails with co-counsel regarding case status.	0.20	400.00	80.00
03/16/2023	FD	Review DeMuro status report; multiple emails to Ms. Neal regarding preliminary discovery and extension of time to respond; attention to F&CS request.	0.40	595.00	238.00
03/16/2023	PD	Work on open records request lawsuit; research and begin drafting lawsuit (2); conference with Mr. Brewster regarding strategy for pressing discovery in criminal cases (.25); conference with Kathy LaFortune regarding what she sees in the jail (.25); status ememo to GAL/NF (1).	3.50	560.00	1,960.00
03/17/2023	DWL	Confer with Mr. DeMuro regarding case schedule (0.3); attend telephonic conference with Defendants' attorneys regarding response deadline and early discovery (0.2); confer with Messrs. DeMuro and Dorwart regarding early discovery and case strategy (0.3); research issues related to anticipated motion to dismiss (0.8); exchange emails with Mr. DeMuro regarding case schedule (0.2); attention to emails with co-counsel and clients regarding case status (0.2).	2.00	400.00	800.00
03/17/2023	FD	Telephonic conference with defendants' counsel respecting agreement as to production of documents, filing of motion to dismiss and filing of motion to expedite discovery; conference with Messrs. DeMuro and Leimbach and motion to expedite discovery.	0.80	595.00	476.00
03/17/2023	PD	Review new psyche report on named plaintiff B.S. and related emails (1); litigation status report 2 to NF (.5); prepare for and attend conference call with AGA regarding request for early discovery; debrief with team about need to press for early discovery (1).	2.50	560.00	1,400.00
03/18/2023	FD	Multiple emails to Mesdames Lapidus and Brennan and Mr. DeMuro scheduling interview with F&CS representative.	0.25	595.00	148.75
03/20/2023	FD	Conference with Elise Berman at Connor Winters regarding access to F&CS jail program leader.	1.00	595.00	595.00
03/20/2023	PD	Data project conference with Ms. Sandee and Brek Wilkins (.5); work on fallout from Department mooting out Savoy; multiple calls and emails with team and GAL (1); review state court transcripts from contempt proceedings (.5); prepare for and meet with FCS general counsel and debrief with Mr. Dorwart (1.25).	3.25	560.00	1,820.00
03/21/2023	PD	Status Report No. 3 regarding DMH mooting our case.	1.00	560.00	560.00

03/22/2023	DWL	Confer with Mr. DeMuro regarding defendants' attempts to moot named plaintiffs.	0.20	400.00	80.00
03/22/2023	JMM	Westlaw - adding plaintiff; Telephone conference with Mr. DeMuro - moot ness and adding plaintiffs' issues. [NO CHARGE]	0.00	405.00	No Charge
03/22/2023	PD	Conference with Mr. Medina and Mr. Leimbach preparing for motion to dismiss with mootness doctrine (.5); telephone conference with Evan Watson regarding Mr. Redelk getting transported and how to deal with mootness doctrine (.5); same with Mr. Meyer (.5); emails with Mr. Brewster regarding same (.5).	2.00	560.00	1,120.00
03/23/2023	DWL	Conduct Westlaw research on mootness issues in context of class actions and exchange emails with Mr. DeMuro regarding same.	2.80	400.00	1,120.00
03/23/2023	JMM	Review class action case. [NO CHARGE]	0.00	405.00	No Charge
03/23/2023	PD	Research mootness issues with Department picking off our named Plaintiffs; telephone conference with GAL regarding same (1); emails with OIDS regarding recent observations on competency cases after lawsuit (.5); retain Starlight data AI as non-testifying consultant (.5).	2.00	560.00	1,120.00
03/24/2023	PD	Research and draft open records complaint (2.5); emails with Brek Wilkins regarding data culling (.5).	3.00	560.00	1,680.00
03/27/2023	DWL	Confer with Mr. DeMuro regarding discovery issues.	0.20	400.00	80.00
03/27/2023	FD	Attention to Elise Brennan advising out of office for the week and indication F&CS will not cooperate.	0.50	595.00	297.50
03/27/2023	JMM	Westlaw - research open records issue; Office conference with Mr. DeMuro - Same. [NO CHARGE]	0.00	405.00	No Charge
03/27/2023	PD	Work on motion for prompt discovery; confer with Mr. Leimbach and Mr. Medina (1); emails and telephone conference with other defenders in OK to check on status of competency waitlist in their jurisdiction, including, Bob Rabitz and Tim Laughlin (1); review proposed protective order and circulate to team (.75); work on open records complaint finalizing first draft and circulating to Appleseed for comment (2.5); work on first set of discovery requests (1); email Groundswell expert to set up call (.25).	6.50	560.00	3,640.00
03/28/2023	DWL	Conduct Westlaw research for motion for expedited discovery and email analysis to Mr. DeMuro (3.8); confer with Messrs. DeMuro and Medina regarding motion for expedited discovery and defendants' anticipated motion to dismiss (0.8).	4.60	400.00	1,840.00
03/28/2023	FD	Multiple emails regarding motion for expedited discovery.	0.60	595.00	357.00
03/28/2023	JMM	Review mootness cases; Office conference with Messrs. DeMuro and Leimbach - expedited discovery. [NO CHARGE]	0.00	405.00	No Charge
03/28/2023	PD	Final work and emails expressing agreement with protective order (1); work on expedited discovery motion including research; meet with Messrs. Medina and Leimbach (1); work on editing open records lawsuit; email to Mr. Walton regarding same (1); work on litigation Status Report No. 4 on mooting NP and related emails to team (1); emails with Bob Rabitz regarding 2015 MOU and Jenkins transcript (.5); email to Groundswell regarding Jenkins transcript (.25).	4.75	560.00	2,660.00
03/29/2023	DWL	Confer with Mr. Medina regarding mootness issues (0.5); attention to emails with clients and experts regarding next steps (0.3).	0.80	400.00	320.00
03/29/2023	FD	Multiple emails discussing Mental Health Department moving plaintiffs off schedule motion to expediate discovery.	0.40	595.00	238.00
03/29/2023	JMM	Review Open Records Act petition; Office conference with Mr. Leimbach - mootness cases; review cases. [NO CHARGE]	0.00	405.00	No Charge

03/29/2023 PD	Work on open records lawsuit, incorporating comments and final approval for same (1.5); emails with Rabitz and Brewster regarding status in their jail with alleged in-jail restoration (1); emails with Groundswell to set up call on in-jail restoration claims (.5); work on motion for expedited discovery (.5).	3.50	560.00	1,960.00
03/30/2023 FD	Conference with Mr. DeMuro regarding Attorney General Meeting; multiple emails scheduling expert teleconference.	0.30	595.00	178.50
03/30/2023 PD	Conference with Attorney General regarding possible discussion (.25); continue to work on open records request lawsuit including emails with Saxum (.5); emails setting up team call with experts to discuss alleged in-jail restoration (.5); emails with Brek Wilkins and telephone conference with Ms. Santee regarding OSCN data culling project and case status(.75).	2.00	560.00	1,120.00
03/31/2023 DWL	Revise draft petition for Open Records Act action and exchange emails with co-counsel regarding same.	0.80	400.00	320.00
03/31/2023 PD	Work on open records lawsuit and press release, generating final copy of both (1.5); emails with team regarding mootness issues and new lists for new NP (.5).	2.00	560.00	1,120.00

Subtotal Fees: 50,966.75
 Contingent: (50,966.75)

Rate Summary		
Paul DeMuro	64.25 hours at \$560.00/hr	35,980.00
Frederic Dorwart	8.65 hours at \$595.00/hr	5,146.75
David W. Leimbach	24.60 hours at \$400.00/hr	9,840.00
J. Michael Medina	0.00 hours at \$405.00/hr	No Charge
Total hours:	97.50	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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PAYMENT DUE UPON RECEIPT

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Invoice as of 5/1/2023
 Invoice No: 148903

Frederic Dorwart, Lawyers PLLC
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 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
04/01/2023	FD Review and comment on final open records act petition.	0.30	595.00	178.50
04/03/2023	CVW Review, edit and finalize draft Petition for Open Records Violation; prepare Entry of Appearances for Mr. DeMuro, Mr. Leimbach and Ms. Briggs; prepare Civil Cover Sheet; emails with Mr. DeMuro, Mr. Leimbach and Ms. Caywood regarding same. [NO CHARGE]	0.00	245.00	No Charge
04/03/2023	FD Multiple emails with Mr. DeMuro concerning AG meeting.	0.25	595.00	148.75
04/03/2023	FD Attention to preparing filing package including multiple emails with Ms. Caywood and Mr. DeMuro.	0.30	595.00	178.50
04/03/2023	FD Emails x3 with Ms. Brennan and Mr. DeMuro advising F&CS has been instructed not to talk to lawyers.	0.25	595.00	148.75
04/03/2023	PD Final preparation of open records lawsuit (.5); emails with FCS counsel denying our request to talk to program manager and related emails to Mr. Dorwart (.5); emails with NF Evan Watson regarding new GAL client (.5).	1.50	560.00	840.00
04/04/2023	DWL Zoom with experts and co-counsel regarding expert analysis (0.5); confer with Mr. DeMuro regarding anticipated motion for early discovery (0.2); conduct research for same (1.5).	2.20	400.00	880.00
04/04/2023	FD Multiple emails with Mr. DeMuro respecting Attorney General meeting.	0.25	595.00	148.75
04/04/2023	PD Prepare for and attend Zoom meeting with Groundswell regarding alleged in-jail restoration program and responses thereto (1); work with AG's office and our counsel to set up AG meeting, and related emails (1); deal with PR for open records lawsuit (1).	3.00	560.00	1,680.00
04/05/2023	PD Emails with Groundswell regarding motion for expedited discovery (.25); emails with Evan Watson regarding new named plaintiff (.25); emails with team in preparation for AG meeting (.5).	1.00	560.00	560.00
04/06/2023	FD Review and comment on proposed protective order; multiple emails regarding same.	0.30	595.00	178.50
04/06/2023	PD Emails with AG regarding protective order claw back (.5); emails with team regarding new named plaintiffs (.5).	1.00	560.00	560.00
04/07/2023	FD Office conference with Mr. DeMuro developing asks for meeting with AG.	0.25	595.00	148.75

04/07/2023	PD	Conference with Mr. Dorwart regarding plan for meeting with AG (.25); status email to Next Friends (.5); review new next friend narratives (.5); telephone conference and emails with Next Friends regarding new plaintiffs (.5); begin review of Colorado consent decree (.5).	2.25	560.00	1,260.00
04/10/2023	FD	Review motion to dismiss.	0.60	595.00	357.00
04/10/2023	JMM	Review motion to dismiss. [NO CHARGE]	0.00	405.00	No Charge
04/10/2023	PD	Work on preparing for AG meeting; office conference with Mr. Dorwart and conference call with OKLC (1); telephone conference and related emails with NF Briggs to discuss replacement NP and research for ADA claim (1); initial review of Motion to Dismiss and status email to NF's regarding same; initial research on some arguments (1).	3.00	560.00	1,680.00
04/11/2023	CVW	Research Kansas and Colorado pending litigation cases for updates; summary email to Mr. DeMuro regarding same. [NO CHARGE]	0.00	245.00	No Charge
04/11/2023	DWL	Analyze defendants' motion to dismiss, conduct preliminary research on various issues, and begin planning response (3.4); confer and exchange emails with Mr. DeMuro regarding same (0.5).	3.90	400.00	1,560.00
04/11/2023	FD	Multiple emails respecting planning conduct of AG meeting.	0.25	595.00	148.75
04/11/2023	FD	Emails x4 with Mr. DeMuro respecting response to motion to dismiss.	0.25	595.00	148.75
04/11/2023	JMM	Westlaw - judicial exhaustion and conditions; Review motion to dismiss for research issue. [NO CHARGE]	0.00	405.00	No Charge
04/11/2023	PD	Work on motion to dismiss; research PLRSA issues; conference with Mr. Leimbach regarding Younger and mootness; conference with Mr. Medina regarding PRLSA issue; emails with co-counsel regarding ADA issues (2.5); multiple emails with team confirming new time for meeting with AG (.25).	2.75	560.00	1,540.00
04/12/2023	DWL	Review new case on Younger abstention sent by Mr. DeMuro (0.3); preliminary research for response to motion to dismiss (1.5).	1.80	400.00	720.00
04/12/2023	FD	Attend OKC meeting with Attorney General.	4.50	595.00	2,677.50
04/12/2023	PD	Prepare for AG meeting (outline argument); pre-meeting and discussions; meet with AG and his team (1.75); emails with NF's regarding getting new GALs to rebut mootness (.75).	2.50	560.00	1,400.00
04/13/2023	PD	Work on motion to dismiss research (.5); emails regarding new GALs (.5); emails with Groundswell regarding affidavit in support of motion for expedited discovery (.25).	1.25	560.00	700.00
04/14/2023	DWL	Continue research for response to motion to dismiss on abstention and related issues.	2.50	400.00	1,000.00
04/14/2023	FD	Multiple emails with Kindanne Jones respecting withdrawal of Motion to Dismiss and collaboration on resolving action.	0.25	595.00	148.75
04/14/2023	PD	Emails with AG, and telephone conference with Mr. Dorwart, regarding plan to move forward with settlement discussions (1); emails with Groundswell regarding affidavit for response to motion to dismiss (.5).	1.50	560.00	840.00
04/17/2023	DWL	Attention to emails with co-counsel, experts, and clients regarding settlement negotiations; confer with Mr. DeMuro regarding next steps.	1.50	400.00	600.00
04/17/2023	FD	Conference with Mr. DeMuro discussing response to Defendants' offer to without and stay action in upcoming telephone call with Kindanne Jones; teleconference with Ms. Jones discussing collaborative effort during stay of action and how to proceed.	0.50	595.00	297.50
04/17/2023	FD	Attention to DeMuro status report and multiple emails regarding same; emails with Ms. Santee respecting status of litigation.	0.30	595.00	178.50

04/17/2023	PD	Telephone conference with AAG regarding plan to withdraw motion, joint stay request, and to outline plan forward; review of prior early discovery requests and related issues (1); email status reports to NF Amy Santee and experts; follow-up emails with Appleseed regarding ADA research and legislative fixes; calls with Ms. Santee regarding same (1.5); emails with experts (.25).	2.75	560.00	1,540.00
04/18/2023	PD	Telephone conference with Mr. Brewster regarding what he's seeing in the Tulsa County Jail regarding restoration and recent press inquiry.	0.50	560.00	280.00
04/19/2023	CVW	Emails with Mr. DeMuro; begin draft Joint Motion to Stay.	0.20	245.00	49.00
04/19/2023	PD	Work on joint motion to stay; research.	1.00	560.00	560.00
04/20/2023	DWL	Revise draft joint motion to stay and exchange emails with Mr. DeMuro regarding same.	0.50	400.00	200.00
04/20/2023	FD	Review and comment on proposed Motion to Stay; multiple emails with Ms. Mindy Jones and Mr. DeMuro respecting when to file motion.	0.40	595.00	238.00
04/20/2023	PD	Finalize motion for stay, with team comments, and circulate (1); meet with Corbin Brewster to discuss his view of potential remedy (1); review proposed legislation sent by Appleseed and related emails (1).	3.00	560.00	1,680.00
04/21/2023	DWL	Zoom with experts regarding potential settlement and remedies.	0.40	400.00	160.00
04/21/2023	FD	Zoom conference with Neil Gowensmith and David Murrie and Messrs. DeMuro and Liembach	0.40	595.00	238.00
04/21/2023	PD	Conference with WSJ reporter regarding status of case (.5); emails with Ms. Briggs regarding next GAL appointment (.5); emails with AG regarding motion to stay (.25); telephone conference with Groundswell expert team regarding next steps (.25).	1.50	560.00	840.00
04/24/2023	FD	Zoom conference with Mike Thompson, Zack Stoycoff, Brittany Hayes, and Amy Santee discussing remedial issues.	2.00	595.00	1,190.00
04/24/2023	PD	Prepare for and attend meeting with Ms. Santee to discuss remedies, Zooming in other experts, including Brittany Hayes; follow-up emails regarding CCBHC's; Westlaw research	3.00	560.00	1,680.00
04/25/2023	FD	Study SB 522; emails with Mr. DeMuro respecting same.	0.30	595.00	178.50
04/25/2023	PD	Emails and telephone conference with Appleseed regarding SB 552; research.	0.50	560.00	280.00
04/26/2023	DWL	Attention to joint motion to stay and Defendant's motion to withdraw documents and Court orders regarding same.	0.30	400.00	120.00
04/26/2023	FD	Attention to withdrawal of motion to dismiss and joint motion for stay; attention to filing and orders entered on same.	0.40	595.00	238.00
04/26/2023	PD	Review and file motion to stay; review orders from Judge Frizzell ordering stay and withdraw of defendants' motion to dismiss; emails with Colleen regarding SB 552.	1.00	560.00	560.00
04/27/2023	DWL	Attention to emails regarding new legislation potentially impacting lawsuit.	0.50	400.00	200.00
04/27/2023	PD	Emails with AG's office setting up next steps call (.75); emails with Appleseed regarding SB 552; review bill and related emails with Mr. Dorwart (.5); draft Litigation Status No. 8 (.25).	1.50	560.00	840.00
04/28/2023	DWL	Confer with Mr. DeMuro regarding next steps and settlement negotiations.	0.30	400.00	120.00
04/28/2023	FD	Multiple emails to Messrs. DeMuro and Pedersen discussing next collaboration steps.	0.25	595.00	148.75

Subtotal Fees:	\$32,247.50
Contingent:	(32,247.50)

Rate Summary		
Paul DeMuro	34.50 hours at \$560.00/hr	19,320.00
Frederic Dorwart	12.30 hours at \$595.00/hr	7,318.50
David W. Leimbach	13.90 hours at \$400.00/hr	5,560.00
J. Michael Medina	0.00 hours at \$405.00/hr	No Charge
Chantel Wilson	0.20 hours at \$245.00/hr	49.00
Total hours:	60.90	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
 Acct. Name: Frederic Dorwart, Lawyers PLLC
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 Account #312977868
 Routing #103900036

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PAYMENT DUE UPON RECEIPT

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Invoice as of 6/1/2023
 Invoice No: 148888

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
05/01/2023	FD Prepare for and attend teleconference with Mr. DeMuro and Ms. Kindy Jones, Dave Pedersen, and OKMHD lawyers respecting conduct of collaborative discussion' multiple emails to Mr. DeMuro reporting to FDL Legal Team.	0.70	595.00	416.50
05/01/2023	PD Prepare for and attend call with an AG regarding settlement process and related emails; emails to Brittany Hayes regarding same.	1.00	560.00	560.00
05/02/2023	PD Telephone conference with Cary Aspinwall regarding information on Turnkey; telephone conference with Mr. Southerland regarding "whistleblower" at Department.	0.50	560.00	280.00
05/03/2023	PD Prepare for and attend call with Brittany Hayes from Healthy Minds regarding matrix of consent.	1.00	560.00	560.00
05/11/2023	DWL Zoom with experts regarding pending legislation (0.3); attention to emails regarding same (0.2).	0.50	400.00	200.00
05/11/2023	FD Multiple emails to Ms. Jones respecting collaboration events; multiple emails to Groundswell regarding status of work; attention to payment of Groundswell invoices.	0.50	595.00	297.50
05/11/2023	FD Emails x4 to Ms. Jones and Mr. DeMuro concerning starting interviews of service providers.	0.25	595.00	148.75
05/11/2023	PD Prepare for and attend telephone conference with Groundswell team regarding effects of new SB regarding restoration service (.5); emails with Groundswell and confer with Ms. Dudley regarding payment problems (.25); emails with AG's office regarding next steps in confer process (.25).	1.00	560.00	560.00
05/12/2023	FD Multiple emails to Ms. Jones respecting production of documents and interviews of service providers.	0.40	595.00	238.00
05/12/2023	PD Emails with Groundswell and staff regarding retention agreement (.5); emails with AG's office regarding first document production and setting up call after AG meets with Department (.5).	1.00	560.00	560.00
05/15/2023	CVW Emails with Susan Yingling at OAG's office regarding their document production; receive and download; email to Mr. DeMuro and Mr. Leimbach regarding same. [NO CHARGE]	0.00	245.00	No Charge
05/15/2023	DWL Attention to emails regarding defendants' document production and case strategy.	0.40	400.00	160.00

05/15/2023	FD	Attention to DMH production of documents and scheduling teleconference to discuss interviews.	0.50	595.00	297.50
05/15/2023	PD	Review first round of document production and ememo to team (1); telephone conference with parents with child in OFC complaining of care (.5); review Menisi case and e-memo to Mr. Brewster regarding same (1).	2.50	560.00	1,400.00
05/17/2023	DWL	Prepare for and participate in conference call with opposing counsel and co-counsel regarding potential settlement (0.4); analyze documents produced by defendants (0.5); confer with Mr. DeMuro regarding same (0.4).	1.30	400.00	520.00
05/17/2023	FD	Emails to Mr. DeMuro with Ms. Jones respecting documents provided by DMH; teleconference with Mr. DeMuro and MDH team regarding collaborative efforts; conference with Mr. DeMuro discussing proposed class certification.	1.00	595.00	595.00
05/17/2023	PD	Prepare for and attend conference call with AG on next steps; review initial document production; confer with team regarding class certification request; research conditional class certification options; draft, edit, and transmit email regarding same.	2.50	560.00	1,400.00
05/18/2023	CVW	Receive email and next document production from OAG's office - Susan Yingling; download same; email to Mr. DeMuro. [NO CHARGE]	0.00	245.00	No Charge
05/18/2023	PD	Prepare for and attend meeting with Mr. Brewster and his staff to discuss.	2.50	560.00	1,400.00
05/19/2023	PD	Billing emails with PR firm (.25); telephone conference with OKDL regarding discovery transmission (.25).	0.50	560.00	280.00
05/22/2023	FD	Email to Mr. DeMuro regarding Colorado State v. Kellie Marie Menesini. CF-2022-521.	0.20	595.00	119.00
05/22/2023	PD	Review federal case on competency; related emails.	1.00	560.00	560.00
05/24/2023	DWL	Review documents produced by defendants (0.4); prepare for and attend telephonic conference with opposing counsel regarding discovery for purposes of potential settlement (0.5); confer with Mr. DeMuro regarding same (0.2); attention to related emails (0.2).	1.30	400.00	520.00
05/24/2023	FD	Review Status Report #9.	0.25	595.00	148.75
05/24/2023	PD	Review Department's most recent discovery (1); weekly status call with AG's team to discuss informal discovery issues (.25); debrief with Mr. Leimbach (.25); status report to NF, followed by three separate emails to NF, enclosing treatment notes for NP (1).	2.50	560.00	1,400.00
05/25/2023	DWL	Attention to emails with co-counsel and opposing counsel regarding draft motions from defendants' counsel.	0.50	400.00	200.00
05/25/2023	PD	Emails with AG regarding document production, and with staff, regarding downloading, organizing, and about proposed orders.	1.00	560.00	560.00
05/26/2023	FD	Emails x3 to Ms. Jones and Mr. DeMuro regarding Draft Proposed Protective and Related Orders & Joint Motions.	0.30	595.00	178.50
05/26/2023	PD	Review new discovery produced by AG.	1.00	560.00	560.00
05/29/2023	PD	Communications with Mr. Brewster regarding competency hearing in state court and WSJ article.	0.25	560.00	140.00
05/30/2023	DWL	Attention to emails with co-counsel and opposing counsel regarding motion for protective order; attention to emails with experts and co-counsel regarding passage of new legislation.	0.50	400.00	200.00
05/30/2023	FD	Multiple emails to Messrs. DeMuro, Sutherland, and Goldsmith regarding SB 552 and effect on litigation.	0.30	595.00	178.50
05/30/2023	FD	Attention to filing of joint motions including emails to Devan Pederson and Mr. DeMuro regarding same.	0.30	595.00	178.50

05/30/2023 PD	Multiple emails with team and experts regarding SB 255 and its effect (1); attend and assist with competency hearing for D. Prince in Tulsa County at which Department witnesses were examined; debrief with Mr. Brewster regarding same (3.5); review and approve new PO's for release of HIPPA information (.5).	5.00	560.00	2,800.00
05/31/2023 DWL	Conference call with opposing counsel and co-counsel regarding discovery (0.4); review additional documents produced by defendants (1.0); confer with Mr. DeMuro regarding same (0.2); attention to court order on discovery issues (0.1); attention to emails with experts and co-counsel regarding evaluation of defendants' in-jail services (0.2).	1.90	400.00	760.00
05/31/2023 PD	Prepare for and attend litigation status call with AG; review all discovery produced; emails with expert regarding new documents on jail restoration program; confer with Mr. Leimbach regarding same.	3.50	560.00	1,960.00
			Subtotal Fees:	\$20,336.50
			Contingent:	(20,336.50)

Rate Summary		
Paul DeMuro	26.75 hours at \$560.00/hr	14,980.00
Frederic Dorwart	4.70 hours at \$595.00/hr	2,796.50
David W. Leimbach	6.40 hours at \$400.00/hr	2,560.00
Chantel Wilson	0.00 hours at \$245.00/hr	No Charge
Total hours:	37.85	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
06/01/2023	DWL Review transcript and confer with Mr. DeMuro regarding testimony from contempt hearing.	0.30	400.00	120.00
06/01/2023	FD Attention to Nick Southerland information respecting review.	0.40	595.00	238.00
06/01/2023	FD Attention to Deandre Prince Subpoenas and trial testimony. [NO CHARGE]	0.00	595.00	No Charge
06/01/2023	PD Continue to review documents produced by Defendants and confer with Mr. Leimbach regarding same (1); confer with Mr. Dorwart regarding case status (.25); confer with Mr. Brewster regarding Prince hearing and next contempt hearing; review Prince transcript (.75).	2.00	560.00	1,120.00
06/02/2023	DWL Confer with Mr. DeMuro regarding interview scheduling.	0.20	400.00	80.00
06/02/2023	PD Confer with ODLIC regarding problems with new act and status of discussions with DMH; confer with Mr. Leimbach regarding setting interviews with service providers.	1.00	560.00	560.00
06/04/2023	FD Emails to Messrs. Gowensmith and DeMuro regarding teleconference to discuss SB522 and MHD so-called competency plan.	0.25	595.00	148.75
06/04/2023	PD Work to schedule call with Groundswell team.	0.50	560.00	280.00
06/05/2023	DWL Zoom with experts and co-counsel regarding analysis of SB 552 and potential remedies.	0.60	400.00	240.00
06/05/2023	FD Zoom Conference with Neil Gowensmith, Ira Packer, Dan Murrie and Lauren Kois discussing MHD competency plan and SB 522 enigmas.	0.65	595.00	386.75
06/05/2023	PD Prepare for and attend conference with experts on remedial plan; telephone conference with Mr. Brewster regarding status of Tulsa County competency list.	1.50	560.00	840.00
06/07/2023	CVW Review emails and document production transmissions received from Susan Yingling; emails with Ms. Yingling and Mr. DeMuro regarding same.	0.30	245.00	73.50
06/07/2023	DWL Attention to emails with opposing counsel regarding status of document productions (0.2); conference call with defendants' counsel and co-counsel regarding status of discovery for purposes of settlement discussions (0.4); analyze new senate bill and confer with Mr. DeMuro regarding same (1.0).	1.60	400.00	640.00

06/07/2023	FD	Multiple emails concerning document production and interviews of service providers; emails to Mr. Gowensmith regarding Team to develop proposed consent decree.	0.50	595.00	297.50
06/07/2023	PD	Prepare for and attend weekly status call with AG's office and debrief with Mr. Leimbach (1) review supplemental discovery produced today (1); telephone conference with Leslie Briggs and Colleen McCarty to discuss possible remedies (.5); emails with experts regarding same (remedies) (.5)	3.00	560.00	1,680.00
06/08/2023	FD	Attention to search terms including emails to Ms. Jones regarding same.	0.30	595.00	178.50
06/08/2023	PD	Review Department search terms against discovery and confer by email to AG team regarding same (1); emails with Briggs regarding status of case and their request to participate (.5).	1.50	560.00	840.00
06/09/2023	FD	Multiple emails with Mr. Gowensmith and Mr. DeMuro regarding Groundswell comments on SB 522 and MDH plan.	0.25	595.00	148.75
06/09/2023	FD	Multiple emails to Messrs. Devan Peterson and Ms. Mindy Jones regarding search terms and various options for resolving.	0.30	595.00	178.50
06/09/2023	PD	Review Groundswell preliminary report; emails with AG's team regarding email search.	1.00	560.00	560.00
06/10/2023	FD	Multiple emails to Mr. DeMuro and Plaintiffs' Team regarding Governor Stitt veto of SB 522.	0.25	595.00	148.75
06/10/2023	PD	Ememo to GKFF and Saxon regarding possible opportunity with SB 552 veto; related emails from other stakeholders.	1.00	560.00	560.00
06/11/2023	FD	Multiple emails discussing possible press release respecting Still veto of SB 522.	0.30	595.00	178.50
06/12/2023	FD	Multiple emails to Gowensmith Team, Houda Elizgy, and Mr. DeMuro regarding public relations announcement concerning veto.	0.50	595.00	297.50
06/12/2023	PD	Emails with GKFF and others regarding possible pit falls of press coverage on SB 552 veto.	0.50	560.00	280.00
06/13/2023	FD	Multiple emails to Messrs. Pedersen and DeMuro scheduling service provider interviews.	0.40	595.00	238.00
06/13/2023	PD	Respond to department's request to stay with first email search terms despite deficiencies; setting up Zoom interview with Carl Albert provider.	0.50	560.00	280.00
06/14/2023	DWL	Attention to email from Mr. DeMuro regarding status of settlement negotiations.	0.20	400.00	80.00
06/14/2023	FD	Attention to DeMuro report of discovery discussions with AG's office.	0.25	595.00	148.75
06/14/2023	PD	Attend weekly telephone conference with AG team to set up interviews and discuss document production; follow-up notes to FDL and OKDL teams (.75); emails with Appleseed regarding plan for new program (.25).	1.00	560.00	560.00
06/15/2023	PD	Emails with Appleseed regarding proposed new draft restoration plan; emails with Mr. Brewster regarding CLE by DMH on in-jail restoration.	1.00	560.00	560.00
06/16/2023	DWL	Attention to emails with experts and Mr. Dorwart regarding possible remedies.	0.30	400.00	120.00
06/16/2023	FD	Multiple emails to Messrs. Gowensmith, DeMuro and Parker discussing shifting effort to developing plan.	0.50	595.00	297.50
06/16/2023	PD	Emails with Groundswell regarding new assignment on remedies (.5); emails with AG regarding scheduling F&CS appointment (.25) email with client NF Briggs regarding developing remedies (.25).	1.00	560.00	560.00
06/19/2023	FD	Attention to scheduling Service Provider interviews.	0.25	595.00	148.75

06/19/2023	PD	Work on developing remedies and preparing for witness interviews.	1.00	560.00	560.00
06/20/2023	FD	Multiple emails scheduling service provider interviews and discussing digital search terms.	0.30	595.00	178.50
06/20/2023	PD	Prepare for provider witness interviews.	1.00	560.00	560.00
06/21/2023	FD	Multiple emails respecting service provider interviews.	0.20	595.00	119.00
06/21/2023	PD	Prepare for meetings with providers.	2.00	560.00	1,120.00
06/22/2023	FD	Review DeMuro report on F&CS interview.	0.25	595.00	148.75
06/22/2023	PD	Prepare for (outline topics) and attend F&CS meeting a Connor Winters; debrief with Mr. Southerland (3.5); prepare for and attend call with Groundswell team regarding remedies (1.5); emails with AG regarding scheduling next set of interviews (.5).	5.50	560.00	3,080.00
06/23/2023	DWL	Attention to emails with experts regarding analysis.	0.30	400.00	120.00
06/23/2023	FD	Multiple emails to Ms. Kois, Mr. DeMuro, Mr. Sutherland, and Mr. Gowensmith concerning service provider interview and need to move to plan development phase; conference with Mr. DeMuro reviewing status of project.	0.60	595.00	357.00
06/23/2023	PD	Prepare for and attend call with Carl Albert; related rescheduling emails (1); conference with Mr. Dorwart regarding case status (.25); emails with Groundswell regarding potential remedies (.5); review Appleseed comments (.25).	2.00	560.00	1,120.00
06/26/2023	PD	Emails with DA Kunzweiler regarding his upcoming contact with Governor's wife.	0.25	560.00	140.00
06/27/2023	PD	Emails with Ms. Wilson regarding scheduling next round of interviews.	0.25	560.00	140.00
06/30/2023	PD	Emails with Groundswell regarding scheduling site visits and interviews with providers.	0.25	560.00	140.00
				Subtotal Fees:	\$20,851.25
				Contingent:	(20,851.25)

Rate Summary		
Paul DeMuro	27.75 hours at \$560.00/hr	15,540.00
Frederic Dorwart	6.45 hours at \$595.00/hr	3,837.75
David W. Leimbach	3.50 hours at \$400.00/hr	1,400.00
Chantel Wilson	0.30 hours at \$245.00/hr	73.50
Total hours:	38.00	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Frederic Dorwart, Lawyers PLLC

Old City Hall
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Invoice as of 8/1/2023
 Invoice No: 148890

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
07/03/2023	FD Multiple emails concerning status of proposed consent order, interviews with service providers, and document production.	0.50	595.00	297.50
07/05/2023	PD Review Allison's case notes; review prior emails from Groundswell; emails and telephone conference with AG regarding dates for site inspection.	1.00	560.00	560.00
07/06/2023	FD Multiple emails to Ms. Khoi and Mr. Gowensmith regarding remedial plan; multiple emails to Mr. DeMuro scheduling service provider interviews and interviews of Dr. Crystal Hernandez	0.50	595.00	297.50
07/07/2023	CVW Review and respond to emails with Susan Yingling with AG's office regarding new email production; receive and process production; email to Mr. DeMuro regarding same.	0.30	245.00	73.50
07/07/2023	FD Attention to Groundswell Proposal including multiple emails to Messrs. DeMuro and Mr. Gowensmith regarding same.	0.40	595.00	238.00
07/07/2023	PD Emails with Groundswell regarding proposal for case evaluation; emails regarding recently produced discovery.	1.00	560.00	560.00
07/10/2023	CVW Prepare Hightail transmissions to Colleen McCarty, Leslie Briggs, Nick Southerland, and Brian Wilkerson of AG's latest document production; emails regarding same; emails with Susan Yingling regarding production of redacted spreadsheets.	0.50	245.00	122.50
07/10/2023	FD Conference with AG and Muscogee/McIntosh service provider.	2.30	595.00	1,368.50
07/10/2023	PD Emails regarding document production with Department and getting it to our partners (.5); prepare for and attend meeting with Green Country providers (3.5).	4.00	560.00	2,240.00
07/12/2023	FD Emails to Ms. Neel and Mr. DeMuro concerning requesting additional stay of action period.	0.25	595.00	148.75
07/14/2023	FD Review proposed motion to extension of stay and proposed order on the motion.	0.25	595.00	148.75
07/14/2023	FD Attention to Doug Wilson letter demanding F&CS stop providing competency services in Tulsa County Jail; email to Mr. DeMuro regarding same.	0.30	595.00	178.50

07/14/2023	PD	Review and approve motion and order for stay with edits and related emails (.75); due diligence on unforeseen letter from Tulsa County DA barring CFS from operating in Tulsa County jail, including telephone conference with Doug Wilson and AGs office, and confidential sources (1).	1.75	560.00	980.00
07/17/2023	FD	Attention to Doug Wilson letter demanding FCS abandon efforts at County Jail; attention to suspension of Dr. Hernandez including conference with Mr. DeMuro regarding implications of suspension.	0.40	595.00	238.00
07/17/2023	PD	Emails with AGs office regarding final approval on stay papers; emails with team regarding logistics of OFC visit and Dr. Hernandez suspension; conference with Mr. Dorwart regarding cease and desist letter to FCS.	1.00	560.00	560.00
07/18/2023	PD	Emails with team to confirm OFC site visit and related issues.	0.50	560.00	280.00
07/19/2023	CVW	Receive and process supplement production received from Susan Yingling; emails with Mr. DeMuro; email and Hightail transmissions to Colleen McCarty, Leslie Briggs, Nick Southerland, and Brian Wilkerson regarding same.	0.30	245.00	73.50
07/19/2023	PD	Emails to confirm logistics of OFC visit.	0.25	560.00	140.00
07/20/2023	FD	Telephone call with Elise Brennan concerning Doug Wilson cease and desist letter and adverse impact on competency restoration activities; emails to Mr. DeMuro regarding same.	0.40	595.00	238.00
07/21/2023	CVW	Prepare and transmit AG email productions to Neil Gowensmith, Lauren Kois and Allison Thompson.	0.20	245.00	49.00
07/21/2023	FD	Teleconference with Mr. DeMuro, Brian Henderson, and Groundswell Team discussing OFC visit and F&CS expulsion from Tulsa County Jail.	0.40	595.00	238.00
07/21/2023	PD	Status call with Groundswell to organize site visit and Tulsa County jail visit, and discuss recent happenings with CFS cease and desist and suspension of Slatton-Hodges.	0.50	560.00	280.00
07/24/2023	CVW	Coordinate list of attendees for OFC tour on 8/16; telephone conference with Mr. DeMuro; emails with Leslie Briggs; email to Tracy Neel providing list of attendees.	0.40	245.00	98.00
07/24/2023	PD	Provide notice to AGs office of OFC site visit; emails with Allison regarding email review; emails with AG regarding other vendor's meetings.	0.50	560.00	280.00

Subtotal Fees: \$9,688.00

Contingent: (9,688.00)

Rate Summary		
Paul DeMuro	10.50 hours at \$560.00/hr	5,880.00
Frederic Dorwart	5.70 hours at \$595.00/hr	3,391.50
Chantel Wilson	1.70 hours at \$245.00/hr	416.50
Total hours:	17.90	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Invoice as of 9/1/2023
 Invoice No: 148891

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees	Hours	Rate	Amount
08/01/2023 FD Attention to payment of Groundswell invoice by GKFF including multiple emails to Messrs. DeMuro and Levit.	0.40	595.00	238.00
08/01/2023 PD Prepare for and attend Zoom meeting with Red Rock (provider in 14 counties); debrief with Groundswell team and discuss next steps.	3.50	560.00	1,960.00
08/02/2023 FD Multiple emails to Messrs. Levit and DeMuro regarding payment of Groundswell retainer. [NO CHARGE]	0.00	595.00	No Charge
08/02/2023 PD Conference with Appleseed E.D. Colleen McCarty regarding status of litigation (1); conference with AG's office regarding Dr. Hernandez's status and related emails (.25); emails with team regarding payment of Groundswell retainer (.25).	1.50	560.00	840.00
08/03/2023 PD Conference with Ms. Roehm to introduce email review project (.75); conference with DA Kunzweiler regarding next steps at Tulsa County Jail regarding restoration program (.25)	1.00	560.00	560.00
08/04/2023 CVW Receive, process and download Batch 1 - Part 3 of email production from Ms. Yingling; conference with Mr. DeMuro; emails and Hightail transmissions with Colleen, Leslie, Brian and Nick regarding same; emails with Ms. Allison Thompson regarding same; emails with Logan Roehm regarding review of same.	0.60	245.00	147.00
08/04/2023 FD Conference with Mr. DeMuro discussing case management including call to Elise Brennan and objectives of August 15-16 Groundswell visit; cancelling conflicting and rescheduling appoints for participation.	0.30	595.00	178.50
08/04/2023 LER Review documents produced by defendants to identify emails or materials supporting internal concerns or issues in starting the jail-based competency-based restoration program.	3.50	140.00	490.00
08/07/2023 FD Multiple emails to Messrs. DeMuro and Wilson regarding Jail visit.	0.25	595.00	148.75
08/07/2023 LER Review documents produced by defendants to identify emails or materials supporting internal concerns or issues in starting the jail-based competency-based restoration program. [NO CHARGE]	0.00	140.00	No Charge
08/07/2023 PD Work on logistics for jail and OFC visit.	1.00	560.00	560.00
08/08/2023 FD Attention to Jail and Hospital site visits including multiple emails discussing logistics and objectives.	0.70	595.00	416.50

08/08/2023	LER	Review documents produced by defendants to identify emails or materials supporting internal concerns or issues in starting the jail-based competency-based restoration program. [NO CHARGE]	0.00	140.00	No Charge
08/08/2023	PD	Work on logistics for jail and OFC visit.	1.50	560.00	840.00
08/09/2023	CVW	Review Ms. Roehm's summary review of email productions; pull potential hot documents for Mr. DeMuro's review.	0.40	245.00	98.00
08/09/2023	FD	Multiple emails arranging details of jail visit.	0.40	595.00	238.00
08/09/2023	FD	Multiple emails to Tracy Neal, Nick Southerland and Paul DeMuro regarding upcoming site visits and additional due diligence and review of prior settlement agreements.	0.40	595.00	238.00
08/09/2023	PD	Work on logistics for jail and OFC visit.	1.50	560.00	840.00
08/10/2023	PD	Attend interview with Tum Key; debrief with AG, Mr. Southerland, and with experts.	5.00	560.00	2,800.00
08/11/2023	FD	Conference with Mr. DeMuro discussing results of visit to Oklahoma City, upcoming visit to Tulsa Jail and Vinita, and need for experts to focus on preparing remedial plan.	0.60	595.00	357.00
08/11/2023	FD	Teleconference with Groundswell discussing absence of any competency restoration services in Oklahoma City, visit to Vinita, and need to focus on preparation of remedial plan.	0.50	595.00	297.50
08/11/2023	LER	Update excel chart describing document production with email dates.	0.90	140.00	126.00
08/11/2023	PD	Work on logistics for OFC site visit, jail visits, and Grand Lake interview (.75); confer with Mr. Dorwart regarding case status and strategy for remedies like Pinnacle Plan (.5); emails and confer with experts regarding remedies and upcoming interviews (.5).	1.75	560.00	980.00
08/14/2023	FD	Multiple emails discussing cancellation of Fernandez interview and logistics during site visits.	0.50	595.00	297.50
08/14/2023	FD	Multiple emails to Groundswell regarding AG cancelling Fernandez interview and AG advice to her to obtain independent counsel.	0.30	595.00	178.50
08/14/2023	PD	Telephone conference with AG's office advising of cancellation of Dr. Hernandez meeting; email to team regarding same; confer with potential attorney for her.	1.50	560.00	840.00
08/15/2023	FD	Interview Sheriff Regalado and Doug Wilson	1.50	595.00	892.50
08/15/2023	FD	Conference with Lauren Kois and Neil Gowensmith discussing issues to be addressed in proposed plan.	0.70	595.00	416.50
08/15/2023	PD	Prepare for and attend Tulsa County Jail site visit and meeting with Sheriff Regalado and Mr. Wilson; debrief with Groundswell team regarding possible remedies (6); telephone conference with AG and related email regarding logistics for Vinita visit (.5).	6.50	560.00	3,640.00
08/16/2023	PD	Attend site visit at Oklahoma Forensic Center and debrief with experts thereafter.	6.50	560.00	3,640.00
08/17/2023	FD	Review Gowensmith listing of issue items for consideration in structuring a competency restoration plan for consent order including multiple emails to Messrs. DeMuro and Gowensmith regarding same.	0.40	595.00	238.00
08/17/2023	PD	Meet with intern to discuss spreadsheet of DMH emails; emails with Groundswell team regarding next steps.	0.50	560.00	280.00
08/21/2023	PD	Telephone conference with Dr. Hernandez; related emails to Jo Lynn Jeter to hook up as separate attorney.	0.50	560.00	280.00
08/22/2023	PD	Emails to set up additional vendor interviews (.25); emails with Ms. Jeter transmitting case information to facilitate her representation of Dr. Hernandez (.25).	0.50	560.00	280.00
08/23/2023	PD	Work on setting up additional interviews.	1.00	560.00	560.00

08/24/2023	FD	Multiple emails to Tracy Neal regarding interview with Dr. Ardoin.	0.25	595.00	148.75
08/24/2023	PD	Emails with AG regarding setting more interviews.	0.25	560.00	140.00
08/25/2023	PD	Emails and telephone conference with Mr. Sutherland regarding interviews of Dr. Adwon.	0.50	560.00	280.00
08/28/2023	PD	Emails and telephone conference with Mr. Dorwart regarding logistics of expert payment; telephone conference with Ms. Jeter regarding interview with Dr. Hernandez.	1.00	560.00	560.00
08/30/2023	DWL	Attention to emails with co-counsel regarding case status.	0.20	400.00	80.00
08/30/2023	FD	Attention to case status and next steps.	0.40	595.00	238.00
08/30/2023	FD	Emails regarding execution of trustee designations.	0.25	595.00	148.75
08/30/2023	PD	Draft, edit, and transmit status report to NF (1.5); emails setting up interview with Dr. Hernandez (.5).	2.00	560.00	1,120.00
08/31/2023	FD	Emails with Mr. DeMuro regarding status report and copy to Ms. Santee.	0.25	595.00	148.75

Subtotal Fees: \$26,760.50
 Contingent: (26,760.50)

Rate Summary		
Paul DeMuro	37.50 hours at \$560.00/hr	21,000.00
Frederic Dorwart	8.10 hours at \$595.00/hr	4,819.50
David W. Leimbach	0.20 hours at \$400.00/hr	80.00
Logan E. Roehm	4.40 hours at \$140.00/hr	616.00
Chantel Wilson	1.00 hours at \$245.00/hr	245.00
Total hours:	51.20	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Frederic Dorwart, Lawyers PLLC

Old City Hall
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Invoice as of 10/1/2023
 Invoice No: 148892

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
09/01/2023	PD Work on scheduling Dr. Hernandez interview; multiple emails; work on another possible NF referral with Appleseed.	0.50	560.00	280.00
09/05/2023	FD Multiple emails regarding Gowensmith payment. [NO CHARGE]	0.00	625.00	No Charge
09/05/2023	PD Emails with AG regarding scheduling interviews of Dr. Hernandez and others.	0.25	560.00	140.00
09/11/2023	FD Attention to payment to Groundswell [NO CHARGE]	0.00	625.00	No Charge
09/11/2023	PD Emails confirming payment to Groundswell. [NO CHARGE]	0.00	560.00	No Charge
09/13/2023	FD Attention to scheduling of events and multiple emails regarding same.	0.40	625.00	250.00
09/13/2023	PD Status memo to Groundswell regarding upcoming interviews and related emails (.5); emails to Mr. Southerland regarding egregious case in Cherokee County and responses thereto (.5).	1.00	560.00	560.00
09/14/2023	FD Multiple emails arranging interviews.	0.40	625.00	250.00
09/14/2023	PD Prepare for and attend teams interview with Grand Lake MH and debrief with our team (2.75); telephone conferences with Ms. McCarty and Mr. Southerland regarding rumors of settlement agreement (.25).	3.00	560.00	1,680.00
09/15/2023	PD Prepare for and attend telephone conference with Dr. Adroin of DMH on OKC in-jail program; debrief with team thereafter.	3.00	560.00	1,680.00
09/21/2023	CVW Emails with Jill Strother with AG's office regarding transmitting supplemental production; receive and download same; emails with Mr. DeMuro; email and Hightail transmission of production to Brian, Nick, Colleen and Leslie.	0.60	255.00	153.00
09/25/2023	FD Dr. Hernandez interview.	3.00	625.00	1,875.00
09/25/2023	FD Post Hernandez interview discussions regarding engagement of Dr. Hernandez.	0.30	625.00	187.50
09/25/2023	PD Prepare for and attend, and debrief from, interview with Dr. Hernandez, including conferring with her counsel, Ms. Jeter.	4.50	560.00	2,520.00
09/26/2023	CVW Draft letter to Tracy Neel regarding Grand Lake records production; email to Mr. DeMuro for his review; emails with Allison Thompson regarding her review of AG's 9/21/23 production and transmitting same for her review.	0.40	255.00	102.00

09/26/2023	FD	Debrief Hernandez interview; conference with Mr. DeMuro discussing engagement of Dr. Hernandez as consultant and next steps in litigation.	0.60	625.00	375.00
09/26/2023	PD	Confer with Mr. Dorwart regarding use of Dr. Hernandez; related emails with team.	1.00	560.00	560.00
09/28/2023	PD	Confer with team regarding hiring Crystal Hernandez and related issues; letter to AG regarding Grand Lake materials.	1.00	560.00	560.00
09/29/2023	CVW	Prepare letter to Dr. Crystal Hernandez regarding consultant arrangement; finalize and serve to Ms. Jo Lynn Jeter.	0.40	255.00	102.00
09/29/2023	FD	Review proposed Hernandez Consultant Agreement; email to Mr. DeMuro regarding same.	0.30	625.00	187.50
09/29/2023	PD	Draft, edit, and transmit engagement letter to Dr. Hernandez; telephone conference with team regarding same.	1.50	560.00	840.00
				Subtotal Fees:	\$12,302.00
				Contingent:	(12,302.00)

Rate Summary		
Paul DeMuro	15.75 hours at \$560.00/hr	8,820.00
Frederic Dorwart	5.00 hours at \$625.00/hr	3,125.00
Chantel Wilson	1.40 hours at \$255.00/hr	357.00
Total hours:	22.15	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Invoice as of 11/1/2023
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Old City Hall
124 East Fourth Street
Tulsa, OK 74103

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Professional Fees		Hours	Rate	Amount
10/03/2023	PD Review competency reevaluation on NP and related emails.	0.50	560.00	280.00
10/04/2023	FD Attention to DeMuro to Groundswell regarding discovery completed and task is now the plan.	0.25	625.00	156.25
10/04/2023	PD Emails to AG requesting meeting for remedy section; telephone conference with Ms. Jeter regarding Dr. Hernandez engagement and comments with Gentner Drummond.	1.00	560.00	560.00
10/05/2023	FD Multiple emails discussing next work requirements and meeting with ODMH.	0.30	625.00	187.50
10/05/2023	PD Work on scheduling remedy meeting with AG; responding to OIDS attorney anecdotes about NP's condition.	1.00	560.00	560.00
10/06/2023	FD Multiple emails scheduling AG and ODMH visits.	0.30	625.00	187.50
10/06/2023	PD Work with AG's office and our team on logistics for remedies meetings (1); emails with OIDS attorneys regarding lack of in-jail restoration programing in their counties (.25).	1.25	560.00	700.00
10/09/2023	FD Multiple emails to Team concerning schedule for meetings and target date form completion of proposed remedial plan.	0.30	625.00	187.50
10/09/2023	PD Emails with team and NF regarding logistics for remedy meetings with AG and DHM (1); initial review of DMH program documents (1).	2.00	560.00	1,120.00
10/10/2023	FD Attention to extension of motion to stay.	0.25	625.00	156.25
10/10/2023	PD Work on remedial settlement: multiple emails with team to schedule call; telephone conference with ODLC regarding same and regarding DMH proposal (1.25); review and approve draft motion to stay (.25).	1.50	560.00	840.00
10/11/2023	PD Emails with Ms. Jeter regarding expert material for Dr. Hernandez.	0.50	560.00	280.00
10/12/2023	PD Finalize contract with Dr. Hernandez (.25); review DMH material on alleged new restoration program and annotate (1); prepare for, attend, and debrief from Zoom meeting with experts, including Dr. Hernandez regarding DMH proposals and moving forward with our plan (2).	3.25	560.00	1,820.00
10/13/2023	FD Attention to Nick Southerland proposed settlement agreement.	0.40	625.00	250.00
10/13/2023	PD Emails with experts regarding remedies settlement proposal.	1.00	560.00	560.00

10/16/2023	FD	Attention to development of consent decree including multiple emails with Team.	0.90	625.00	562.50
10/16/2023	FD	Multiple emails concerning interview of Mental Health Department Head.	0.25	625.00	156.25
10/16/2023	JMM	Office conference with Mr. DeMuro - Class action issue. [NO CHARGE]	0.00	405.00	No Charge
10/16/2023	PD	Begin to review and comment on Mr. Southerland's proposal and related emails.	2.00	560.00	1,120.00
10/17/2023	PD	Work on proposed settlement agreement.	1.00	560.00	560.00
10/18/2023	PD	Attend legislative meeting on mental health and competency issues (2); work on draft settlement agreement (1).	3.00	560.00	1,680.00
10/19/2023	FD	multiple emails commenting on development of proposed settlement plan.	0.60	625.00	375.00
10/19/2023	PD	Work on draft settlement agreement.	2.50	560.00	1,400.00
10/20/2023	FD	Study Nick Sutherland's initial draft of proposed consent decree, DeMuro redline of same, and Groundswell comments on same.	0.70	625.00	437.50
10/20/2023	PD	Work on draft consent decree/settlement agreement: review other cases agreements and consent decrees; research Rule 23 standards for consent decrees and settlement class; review teams' comments on Mr. Southerland's draft settlement agreement; edit and redline draft; create draft bullet points summary of key terms (6); attend Zoom call with Groundswell, OKDLC, and Dr. Hernandez to discuss draft settlement and other key terms (2.5).	8.50	560.00	4,760.00
10/22/2023	JMM	Review class settlement agreements and orders regarding motion. [NO CHARGE]	0.00	405.00	No Charge
10/23/2023	CVW	Draft Joint Motion for Approval and Entry of Consent Decree; emails with Mr. DeMuro regarding same; receive and download new production from AG's office; emails with team related to same and transmitting copy of production via Hightail; emails with Jill Strother at AG's office regarding same.	1.20	255.00	306.00
10/23/2023	FD	Work on settlement agreement including multiple emails to plaintiffs' team regarding same; review and comment on bullet points or provisions of plan; emails to Mr. DeMuro need to include provision respecting lack of funding as no excuse for non-performance.	1.10	625.00	687.50
10/23/2023	FD	Attention to DeMuro Email to Erin Moore regarding Plaintiffs' preliminary settlement proposal, which outlines the key terms.	0.40	625.00	250.00
10/23/2023	JMM	Research class action check lists. [NO CHARGE]	0.00	405.00	No Charge
10/23/2023	PD	Continue to work on settlement proposal, developing bullet point summary for exchange with AG's office; confer with team including numerous emails with Groundswell and Dr. Hernandez; telephone conference with OKDLC; edit and send to AG.	5.50	560.00	3,080.00
10/24/2023	PD	Continue to prepare for meeting with AG; work on recommendations and respond to requests and clarification from experts (.5); continue to research prerequisites for class action settlement of b2 class (.5).	1.00	560.00	560.00
10/25/2023	PD	Prepare for and attend settlement meeting with AG's team in Tulsa (2); debrief with litigation team and start drafting modifications to bullet point plans (2).	4.00	560.00	2,240.00
10/26/2023	FD	Attention to drafting of settlement agreement; multiple emails to Plaintiffs' Team regarding AG meeting results.	0.40	625.00	250.00
10/26/2023	FD	Attention to plaintiffs' preliminary settlement proposal.	0.40	625.00	250.00
10/26/2023	PD	Work on revising settlement agreement summary; related emails to team; telephone conference with Dr. Crystal Hernandez.	2.50	560.00	1,400.00

10/29/2023 PD	Develop, draft, and edit preliminary findings list at specific request by Attorney General.	5.00	560.00	2,800.00
10/30/2023 PD	Continue to develop, draft, and edit preliminary findings list at specific request by Attorney General; telephone conference with AG chief of staff regarding additional information on list.	3.00	560.00	1,680.00
10/31/2023 PD	Confer with Ms. Hernandez regarding providing supplemental information on topics requested by AG.	1.00	560.00	560.00
			Subtotal Fees:	\$32,959.75
			Contingent:	(32,959.75)

Rate Summary		
Paul DeMuro	51.00 hours at \$560.00/hr	28,560.00
Frederic Dorwart	6.55 hours at \$625.00/hr	4,093.75
J. Michael Medina	0.00 hours at \$405.00/hr	No Charge
Chantel Wilson	1.20 hours at \$255.00/hr	306.00
Total hours:	58.75	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Frederic Dorwart, Lawyers PLLC

Old City Hall
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Invoice as of 12/1/2023
 Invoice No: 148894

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees	Hours	Rate	Amount
11/01/2023 PD Prepare for Nov 6 AG meeting: review DMH "proposal" and email to team with comments (1); edit and circulate our revised proposal and solicit comments from our team regarding same (1).	2.00	585.00	1,170.00
11/02/2023 FD Teleconference with litigation team reviewing status and preparing for meeting with ODMH on Monday.	1.00	625.00	625.00
11/02/2023 PD Prepare for meeting with AG's office: team Zoom call to discuss DMH's proposal; telephone conference with Appleseed regarding same; emails with AG's office regarding logistics for meeting.	2.00	585.00	1,170.00
11/03/2023 PD Prepare for settlement meeting with DMH: emails and telephone conference with team regarding speaking points (1); prepare for and attend Teams call with AG's team and debrief with my team (1); telephone conference with Appleseed and Next Friend Briggs regarding status (.25).	2.25	585.00	1,316.25
11/05/2023 PD Emails with Dr. Hernandez regarding preparation for 11/6 meeting.	0.25	585.00	146.25
11/06/2023 PD Prepare for (outline key positions; confer with Mr. Southerland; pre-meeting with team) and attend settlement meeting with AG's team and Department's team in OKC; debrief with our team.	4.00	585.00	2,340.00
11/06/2023 PD Travel to and from OKC for settlement meeting.	3.75	585.00	2,193.75
11/07/2023 FD Multiple emails regarding Hodges resignation and on-going settlement discussions.	0.50	625.00	312.50
11/07/2023 PD Emails to follow up on 11/6 settlement meeting to experts on QFE issues (1); deal with fall out of CSH announced resignation; emails and telephone conference with AG's team, experts, and stakeholders about how it may effect settlement discussions (1).	2.00	585.00	1,170.00
11/08/2023 PD Continue to confer with team regarding how leadership change will effect consent decree (.5); emails with experts regarding re-evaluation program and related issues (.5).	1.00	585.00	585.00
11/09/2023 FD Multiple emails to Dr. Hernandez regarding consent decree; Zoom conference with Team discussing status and content of proposed consent decree.	0.75	625.00	468.75
11/09/2023 PD Prepare for and attend Teams call on QFE issue; debrief with Groundswell thereafter.	1.00	585.00	585.00

11/10/2023	PD	Work on consent decree terms; emails and conference with team to discuss OFE terms and related issues.	2.00	585.00	1,170.00
11/12/2023	FD	Multiple emails to Dr. Hernandez regarding compensation for health care providers.	0.30	625.00	187.50
11/15/2023	FD	Attention to new draft of consent decree.	0.60	625.00	375.00
11/16/2023	PD	Work on proposed final consent decree.	1.00	585.00	585.00
11/17/2023	PD	Work on proposed final consent decree.	1.00	585.00	585.00
11/18/2023	PD	Work on proposed final consent decree.	1.00	585.00	585.00
11/20/2023	FD	Multiple emails regarding additional retainer to Groundswell. [NO CHARGE]	0.00	625.00	No Charge
11/20/2023	PD	Deal with expert retainer issues.	0.50	585.00	292.50
11/21/2023	FD	Attention to Groundswell retainer including emails Ms. Santee re same; email to Mr. DeMuro re making report to Mr. Levit and Ms. Santee; email Mr. DeMuro reporting status to Mr. Levit and Ms. Santee.	0.40	625.00	250.00
11/21/2023	FD	Attention to Neil Gowensmith's comments on near final proposed consent decree.	0.70	625.00	437.50
11/21/2023	PD	Status report on case to GKFF and related emails discussing same.	1.00	585.00	585.00
11/22/2023	PD	Work on consent decree.	1.00	585.00	585.00
11/26/2023	PD	Work on consent decree.	2.00	585.00	1,170.00
11/27/2023	FD	Attention to finalizing proposed consent decree including conference with Mr. DeMuro regarding same.	0.50	625.00	312.50
11/27/2023	PD	Rework, edit, research, and continue to draft consent decree; related emails.	7.00	585.00	4,095.00
11/28/2023	PD	Continue to rework, edit, research, and continue to draft consent decree; related emails.	5.00	585.00	2,925.00
11/29/2023	PD	Continue to rework, edit, research, and continue to draft consent decree; related emails (1); telephone conference with Mr. Kunzweiler regarding his recent contact with DMH regarding new legislation (.25).	1.25	585.00	731.25

Subtotal Fees: \$26,953.75
 Contingent: (26,953.75)

Rate Summary		
Paul DeMuro	41.00 hours at \$585.00/hr	23,985.00
Frederic Dorwart	4.75 hours at \$625.00/hr	2,968.75
Total hours:	45.75	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Invoice as of 1/1/2024
 Invoice No: 148895

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
12/01/2023	FD Attention to proposed consent decree.	0.60	625.00	375.00
12/01/2023	PD Work on consent decree: researching, drafting, and editing.	3.00	585.00	1,755.00
12/02/2023	PD Work on consent decree: research, drafting, and editing.	3.00	585.00	1,755.00
12/03/2023	PD Work on consent decree: research, drafting, and editing.	3.00	585.00	1,755.00
12/04/2023	CVW Review, edit, and format draft Consent Decree; conference and emails with Mr. DeMuro regarding same.	0.70	255.00	178.50
12/04/2023	FD Attention to consent decree drafting including multiple emails to Mr. DeMuro regarding same.	0.40	625.00	250.00
12/04/2023	PD Continue to work on consent decree: researching, drafting, and editing.	6.00	585.00	3,510.00
12/05/2023	CVW Edit and format draft Consent Decree; conference and emails with Mr. DeMuro regarding same.	0.40	255.00	102.00
12/05/2023	FD Conference with Ms. Lapidus regarding current ODMH issues.	1.00	625.00	625.00
12/05/2023	PD Continue to work on consent decree: researching, drafting, editing, and finishing first draft; circulate to team.	7.00	585.00	4,095.00
12/06/2023	PD Continue to work on consent decree: researching, drafting, editing; reviewing team's comments and begin to incorporate into draft; telephone conference with AG's office regarding timing of delivery of consent decree.	3.00	585.00	1,755.00
12/07/2023	CVW Proof, edit and format final draft of Consent Decree; conferences with Mr. DeMuro regarding same; coordinate final proof with Mr. Cipolla.	1.00	255.00	255.00
12/07/2023	FD Attention to final draft of consent decree for submission to AG.	0.70	625.00	437.50
12/07/2023	PD Continue to work on consent decree: researching, drafting, editing, and send final draft to AG.	3.00	585.00	1,755.00
12/07/2023	RJC Editing and proofreading client draft consent decree as per Mr. DeMuro's request	1.70	425.00	722.50
12/08/2023	DWL Attention to draft consent decree; confer with Mr. DeMuro regarding same.	0.50	440.00	220.00
12/08/2023	FD Multiple emails to FDLaw Team regarding consent decree draft sent to AG.	0.50	625.00	312.50

12/08/2023	PD	Send status reports and CD explaining key features to Next Friends and to GKFF.	1.00	585.00	585.00
12/13/2023	CVW	Work.	8.00	255.00	2,040.00
12/14/2023	FD	Review and markup draft of consent decree.	1.50	625.00	937.50
12/14/2023	PD	Confer with AG regarding status of draft CD.	0.50	585.00	292.50
12/15/2023	PD	Meet with AG regarding Consent Decree progress.	0.20	585.00	117.00
12/18/2023	FD	Reviewing and marking up proposed Consent Decree.	1.90	625.00	1,187.50
12/19/2023	FD	Finish review and markup of proposed consent decree; email to Mr. DeMuro regarding same.	0.90	625.00	562.50
12/19/2023	PD	Deal with threats of DMH working around Consent Decree in Tulsa County and with legislation; multiple calls with stakeholders and AGs office.	1.00	585.00	585.00
12/20/2023	FD	Conference with Mr. DeMuro discussing MDF efforts to thwart consent decree and how to proceed.	0.50	625.00	312.50
12/20/2023	PD	Telephone conference and emails with Tulsa County Sheriff's general counsel, Tim Harris, regarding his meeting with DHM regarding in-jail restoration; internal discussion with Mr. Dorwart regarding strategy to counteract.	1.00	585.00	585.00
12/21/2023	FD	Work on support letters; multiple emails regarding proposed consent decree and DMH attempts to avoid decree.	0.70	625.00	437.50
12/21/2023	PD	Status report to AG Erin Moore regarding Department's efforts to subvert Consent Decree negotiations; follow-up call to advise regarding disclosure of draft Consent Decree to Sheriff's legal team; confer with Mr. Dorwart regarding same.	1.00	585.00	585.00
12/22/2023	PD	Telephone conference with Sheriff's representatives regarding proposal for in-jail restoration program.	1.00	585.00	585.00

Subtotal Fees: \$28,670.00
 Contingent: (28,670.00)

Rate Summary		
Richard J. Cipolla	1.70 hours at \$425.00/hr	722.50
Paul DeMuro	33.70 hours at \$585.00/hr	19,714.50
Frederic Dorwart	8.70 hours at \$625.00/hr	5,437.50
David W. Leimbach	0.50 hours at \$440.00/hr	220.00
Chantel Wilson	10.10 hours at \$255.00/hr	2,575.50
Total hours:	54.70	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Invoice as of 2/1/2024
 Invoice No: 148896

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
01/04/2024	FD Office conference with Mr. DeMuro discussing status of AG responses to proposed consent decree and DMH efforts to undercut litigation.	0.30	625.00	187.50
01/05/2024	FD Multiple emails with Plaintiffs' Team, regarding status.	0.30	625.00	187.50
01/05/2024	PD Emails with team regarding update for Tulsa County in-jail restoration issues; update on dealings with AG's office setting up call.	1.00	585.00	585.00
01/07/2024	FD Multiple emails regarding Plaintiffs' team regarding status of MDH efforts to disrupt consent decree and teleconference with AG regarding consent decree.	0.40	625.00	250.00
01/09/2024	FD Teleconference with Mesdames Erin and Mason discussing status of AG review and comments on Consent Order; multiple emails to Mr. Harris regarding onsite visit to PODs and issues regarding use lease of PODs and rumored MDH proposal for Tulsa competency restoration.	1.10	625.00	687.50
01/09/2024	PD Prepare for, attend, and debrief from AG's status call on CD; related call with Groundswell team regarding their view of other department's playing similar games (1); emails with TCSO regarding setting up tour of jail pods (.5).	1.50	585.00	877.50
01/10/2024	PD Telephone conference with Crystal Hernandez regarding her duel consulting with AG on consent decree.	0.25	585.00	146.25
01/11/2024	PD Conferences with Ms. Hernandez regarding her meeting with the AG and DMH efforts to undermine the consent decree; related emails with team.	1.00	585.00	585.00
01/12/2024	FD Email to Ms. Hernandez regarding rumor new commissioner has been identified with announcement expected soon and discussion of proposed legislation mandating in jail restoration; multiple emails to Plaintiffs' Team regarding same; emails to Mesdames Erin and Neel regarding same.	0.25	625.00	156.25
01/12/2024	FD Multiple Team emails regarding Nick Southerland's report of OKC show cause hearing.	0.30	625.00	187.50

01/12/2024 PD	Confer with team regarding show cause hearings in OKC, next steps if Consent Decree falls apart, and proposed legislation being pushed by Boatman; emails with AG regarding DMH bad faith efforts to undermine the Consent Decree.	1.50	585.00	877.50
01/15/2024 FD	Multiple emails to Ms. Hernandez and Plaintiffs' Team regarding Environment of Care at OFC	0.40	625.00	250.00
01/15/2024 PD	Emails with team regarding legislative efforts.	1.00	585.00	585.00
01/16/2024 FD	Multiple emails to Mr. DeMuro and Mesdames Moore and Neal regarding extension of stay order; emails to Mr. DeMuro regarding conflict between AGs office and MHD; multiple emails to Ms. Hernandez and others regarding EOC at OFC.	0.60	625.00	375.00
01/16/2024 PD	Conference with AGs office regarding stay motion and related email requesting 30 days (.75); emails with Sheriff's and team to set up jail tour for pilot program pods (.75).	1.50	585.00	877.50
01/17/2024 FD	Multiple emails to Ms. Neal and Mr. DeMuro regarding joint application for addition stay; emails to Mr. DeMuro regarding same.	0.25	625.00	156.25
01/17/2024 FD	Attention to Harris email regarding site visit at City Jail.	0.25	625.00	156.25
01/17/2024 PD	Work with AG on draft order extending stay (1); emails with Sheriff's counsel regarding setting up tour (.5).	1.50	585.00	877.50
01/19/2024 FD	Multiple emails to Ms. More and Mr. DeMuro regarding joint motion for extension; office conference with Mr. DeMuro discussing basis for not demanding reference to consent decree in joint motion to extension.	0.40	625.00	250.00
01/19/2024 FD	Multiple emails regarding onsite visit to Jail Pods.	0.25	625.00	156.25
01/19/2024 FD	Multiple emails regarding appoint of Allie Friesen as MDH Commissioner.	0.40	625.00	250.00
01/19/2024 PD	Emails regarding setting up and confirming jail visit (.5); emails with AG and telephone conference regarding motion to extend stay; confer with Mr. Dorwart regarding same (.75).	1.25	585.00	731.25
01/22/2024 PD	Emails with team regarding DHM appointment and related issues.	0.50	585.00	292.50
01/29/2024 PD	Emails regarding logistics for jail visit (.25); emails with Mr. Southerland regarding contempt hearing in OKC (.25).	0.50	585.00	292.50
01/30/2024 PD	Emails with team regarding logistics of meeting/tour of jail.	0.50	585.00	292.50

Subtotal Fees: \$10,270.00
 Contingent: (10,270.00)

Rate Summary		
Paul DeMuro	12.00 hours at \$585.00/hr	7,020.00
Frederic Dorwart	5.20 hours at \$625.00/hr	3,250.00
Total hours:	17.20	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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Invoice as of 4/1/2024
 Invoice No: 148898

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees	Hours	Rate	Amount
03/01/2024 PD Work on preparation for new legislation meeting and study Sells v. Harper background, including Zoom team meeting and related notes.	2.50	585.00	1,462.50
03/02/2024 PD Continue preparation for DMH meeting regarding new legislation; review Groundswell's bullet points and respond; emails with team regarding Tulsa County Sheriff view.	1.00	585.00	585.00
03/04/2024 FD Attention to Hernandez report of incident; multiple Team emails regarding same; email to Mr. DeMuro regarding status of AG opinion on consent order.	0.30	625.00	187.50
03/04/2024 FD Attention to proposed legislation regarding involuntary drug administration including multiple emails with Team and Kindy Jones discussing same.	0.70	625.00	437.50
03/04/2024 PD Prepare for and attend team call with DMH and AGs office regarding proposed new forced med legislation and related issues; debrief with team.	2.50	585.00	1,462.50
03/05/2024 FD Multiple emails to FDLaw Team discussing OKMHD failure to provide amendment to proposed legislation and discussing responding to AGs transmittal of AG comments on proposed legislation.	0.60	625.00	375.00
03/05/2024 PD Emails with team, and with AAG, regarding its version of new legislation, and still lack of transportation amendment.	1.00	585.00	585.00
03/06/2024 FD Multiple emails to FDL Team and Experts discussing proposed legislation and OKDMH responses.	0.80	625.00	500.00
03/06/2024 FD Attention to joint motion for 45-day extension of stay.	0.25	625.00	156.25
03/06/2024 PD Continue work on proposed legislative proposal in IMO; emails and telephone conference with AAG regarding same and regarding the stay.	2.00	585.00	1,170.00
03/07/2024 FD Multiple emails to FDL Team regarding status of IMO litigation.	0.60	625.00	375.00
03/07/2024 PD Continued work on due diligence on IMO legislation and decision by DMH to delay the bill.	1.00	585.00	585.00
03/08/2024 FD Multiple emails to Dr. Hernandez and others regarding illustration of competency deficiencies at OFC.	0.30	625.00	187.50

03/09/2024 PD	Emails with team regarding podcast of new commissioner regarding competency restoration issues (.25); emails with Mr. Dorwart regarding status of consent decree (.25).	0.50	585.00	292.50
03/11/2024 PD	Emails with DOC general counsel regarding proof of service of the subpoena and related issues.	0.25	585.00	146.25
03/13/2024 FD	Conference with Mr. DeMuro regarding strategy to reach OKMHD position on propose consent order.	0.25	625.00	156.25
03/13/2024 FD	Multiple emails regarding passage of Bill regarding prison operating standards.	0.30	625.00	187.50
03/15/2024 FD	Multiple emails with Kindy Jones regarding status of AG comments on consent order; multiple emails with FDL Team regarding meeting with AG and Commissioner Friesen.	0.60	625.00	375.00
03/15/2024 PD	Notice from AG regarding meeting with commissioner on 4/8; coordinate our team's calendars; confer with Mr. Dorwart regarding getting comments on Consent Decree	1.00	585.00	585.00
03/16/2024 FD	Multiple Team emails regarding upcoming meeting with Commissioner Freison.	0.20	625.00	125.00
03/17/2024 PD	Emails with team regarding April 8 meeting.	0.50	585.00	292.50
03/18/2024 FD	Multiple emails with experts regarding scheduled meeting with Commissioner Friesen; conference with AG discussing status.	0.40	625.00	250.00
03/18/2024 PD	Emails with team regarding April 8 meeting and telephone conference with Mr. Meyer regarding same.	0.50	585.00	292.50
03/19/2024 FD	Multiple emails with Team discussing AG meeting; conference with Mr. DeMuro regarding conversation with AG regarding meeting.	0.40	625.00	250.00
03/21/2024 FD	Emails with Ms. Janes confirming April 8 meeting.	0.20	625.00	125.00
03/22/2024 PD	Meet with Burt Holmes regarding proposal for subsidizing psych position at jail.	1.00	585.00	585.00
03/29/2024 FD	Multiple emails to Mr. DeMuro client and Mr. Levit and Ms. Santee regarding April 8 meeting.	0.25	625.00	156.25
03/29/2024 PD	Status update to Next Friends; status update to GKFF.	1.00	585.00	585.00
			Subtotal Fees:	\$12,472.50
			Contingent:	(12,472.50)

Rate Summary		
Paul DeMuro	14.75 hours at \$585.00/hr	8,628.75
Frederic Dorwart	6.15 hours at \$625.00/hr	3,843.75
Total hours:	20.90	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

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 Invoice No: 148897

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees	Hours	Rate	Amount
02/01/2024 PD Multiple emails with team regarding logistics and purpose of Tulsa County Jail visit.	0.50	585.00	292.50
02/02/2024 FD On-site visit of extra Tulsa County jail pods.	1.50	625.00	937.50
02/02/2024 PD Pre-meeting with team for jail visit; tour Tulsa County Jail for pods that could be used for pilot program and debrief with team.	4.00	585.00	2,340.00
02/05/2024 FD Review Hernandez email reporting MHD meeting regarding pending legislative bills and MDH representations there is no waiting list; multiple mails regarding same.	0.40	625.00	250.00
02/05/2024 PD Emails with team regarding rumors about DMH's approach to federal lawsuit.	0.25	585.00	146.25
02/06/2024 PD Emails regarding proposed new legislation by DMH; status email to Ms. Briggs.	0.50	585.00	292.50
02/08/2024 FD Multiple emails to Messrs. DeMuro and Gentner discussing status of consent decree; review AG's report of OKMDH operations; multiple emails to FDL Team regarding same.	0.70	625.00	437.50
02/08/2024 PD Telephone conference with AG regarding settlement status and confer with Mr. Dorwart regarding same.	1.00	585.00	585.00
02/13/2024 FD Multiple emails to Mr. DeMuro to FDLaw Team regarding status of discussions with AG; conference with Mr. DeMuro regarding same.	0.50	625.00	312.50
02/13/2024 PD Confidential status report to litigation team based on recent dealings with AG.	1.00	585.00	585.00
02/14/2024 FD Attention to reports of OKC jail operations, including multiple Team member emails regarding same; multiple emails to Dr. Hernandez reporting operations at OFC.	0.40	625.00	250.00
02/14/2024 PD Emails with team regarding reports of abuse of competency reevaluation process at OFC.	0.50	585.00	292.50
02/15/2024 PD Emails with team regarding OKC jail study.	0.50	585.00	292.50
02/16/2024 PD Emails with team regarding OKC jail report and AG Drummond's comments about the DMH.	1.00	585.00	585.00
02/17/2024 FD Multiple emails discussing data on OKC	0.30	625.00	187.50
02/19/2024 PD Emails with Appleseed regarding recent reports from AG.	0.25	585.00	146.25

02/22/2024	FD	Multiple emails regarding report AG is supporting mandatory meds in jail.	0.30	625.00	187.50
02/23/2024	FD	Attention to Tulsa World story. (NO CHARGE)	0.00	625.00	No Charge
02/23/2024	PD	Interact with Tulsa World for new piece on competency restoration issues.	0.50	585.00	292.50
02/26/2024	FD	Attention to MHDSA statutory proposal and objections to same including multiple emails regarding FDL Team and AG Team regarding same.	0.80	625.00	500.00
02/26/2024	PD	Emergency scramble to react to AG's news about DMH legislation regarding forced meds; multiple emails and telephone conferences regarding same.	1.00	585.00	585.00
02/27/2024	FD	Multiple emails to FDL Team and Kindy Jones regarding AG's reaction to mark-up and comments on proposed legislation and AG prior meeting with ODMHSA first.	0.60	625.00	375.00
02/27/2024	PD	Continue to work on DHS proposed involuntary meds legislation push back.	1.00	585.00	585.00
02/28/2024	FD	Multiple emails to Ms. Jones and FDL Team regarding sharing Team comments with MHD and meeting with them; multiple emails concerning scheduling Zoom conference.	0.40	625.00	250.00
02/28/2024	PD	Emails with AG, and with team, to set up call with DMH to discuss IMO.	0.50	585.00	292.50
02/29/2024	FD	Multiple emails to AG Team and FDL Team discussing ODMH and meeting to discuss proposed legislation.	0.40	625.00	250.00
02/29/2024	PD	Multiple emails with team regarding logistics of meeting with DMH regarding involuntary meds legislation.	1.00	585.00	585.00

Subtotal Fees: \$11,835.00
 Contingent: (11,835.00)

Rate Summary		
Paul DeMuro	13.50 hours at \$585.00/hr	7,897.50
Frederic Dorwart	6.30 hours at \$625.00/hr	3,937.50
Total hours:	19.80	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
 Acct. Name: Frederic Dorwart, Lawyers PLLC
 Bank: Bank of Oklahoma
 Account #312977868
 Routing #103900036

Credit/Debit:
<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 5/1/2024
 Invoice No: 148899

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees	Hours	Rate	Amount
04/01/2024 FD Attention to AG comments on Consent Decree including multiple emails with Team regarding same and teleconferencing to discuss same.	0.30	625.00	187.50
04/01/2024 PD Telephone conference with AAG Erin Moore regarding comments to draft Consent Decree; circulate with team setting meeting.	1.00	585.00	585.00
04/02/2024 FD Attention to AG mark-up of propose consent-decree including multiple emails with FDL Team regarding same.	0.90	625.00	562.50
04/02/2024 FD Review proposed first draft of class action settlement documents; conference with Mr. Burden regarding same.	1.00	625.00	625.00
04/02/2024 PD Emails regarding logistics of April 8 meeting and inbound comments on draft Consent Decree	1.00	585.00	585.00
04/03/2024 FD Attention to AG meeting agenda and emails to Ms. Moore and Mr. DeMuro regarding same.	0.25	625.00	156.25
04/03/2024 PD Work with AGs office to develop agenda for April 8 meeting.	1.00	585.00	585.00
04/04/2024 FD Multiple emails to FDL Team regarding agenda for AG meeting.	0.30	625.00	187.50
04/04/2024 FD FDL Team Zoom meeting reviewing AG markup of Consent Decree and discussing conduct of AG meeting.	2.00	625.00	1,250.00
04/04/2024 PD Prep for 4/8 meeting; review AGs changes to draft Consent Decree and annotate; team Zoom call discussing same and prioritizing issues; debrief with Mr. Dorwart on preparation for 4/8 meeting.	2.50	585.00	1,462.50
04/05/2024 FD Multiple emails with FD Team discussing AG meeting; regarding discussion with AG and OKMHD commissioner; conference with Mr. DeMuro regarding same.	0.70	625.00	437.50
04/05/2024 PD Prepare for 4/8 meeting; confer with Mr. Dorwart regarding preparation for meeting; outline topics; set up call with AG.	1.00	585.00	585.00
04/07/2024 PD Prepare for 4/8 meeting; another detailed review of Consent Decree; annotate and prepare list of topics for meeting; telephone conference with Next Friend, Hank Meyer.	4.50	585.00	2,632.50
04/08/2024 FD Conference with Mr. DeMuro reviewing presentation for AG meeting; teleconference with AG regarding same; multiple emails to FD Team regarding meting; attend meeting; multiple follow-on emails.	8.00	625.00	5,000.00

04/08/2024	PD	Travel to and from Oklahoma City for meeting with AG and Department.	3.50	585.00	2,047.50
04/08/2024	PD	Prepare or meeting; edit talking point notes; review draft Consent Decree again; telephone conference with AG Drummond and AAG Moore; confer with Mr. Dorwart regarding same.	2.00	585.00	1,170.00
04/08/2024	PD	Attend meeting securing commitment to Consent Decree entry and debrief.	3.00	585.00	1,755.00
04/09/2024	FD	Multiple emails to Mr. DeMuro to plaintiffs, GKFF and Team discussing successful agreement to proceed with consent Decree within 30 days; multiple emails to Mr. DeMuro and Erin Moore discussing terms of Consent Decree; email to Mr. DeMuro regarding start date for determining when Plan must be agreed.	0.60	625.00	375.00
04/09/2024	JMM	Westlaw- Research motion issues; Review settlement agreements; Office conference with Mr. DeMuro - Notice issues. [NO CHARGE]	0.00	420.00	No Charge
04/09/2024	PD	Work on redraft of Consent Decree; research Notice issue and class action claims administrator; status report to Next Friends.	4.50	585.00	2,632.50
04/10/2024	FD	Multiple emails to FT Team and Mr. DeMuro regarding drafting of revised Consent Decree.	0.40	625.00	250.00
04/10/2024	PD	Continue to work on redraft of Consent Decree; continue to research Notice issue; telephone conference with possible class action claims administrator; related emails to Next Friends and AG.	5.50	585.00	3,217.50
04/11/2024	FD	Attention to revised consent decree issues including multiple emails to FDL Team.	0.50	625.00	312.50
04/11/2024	PD	Continue to work on redraft of Consent Decree (3.25); continue to research Notice issue and joint motion issue (.5); email to AG conveying next draft of Consent Decree (.25).	4.00	585.00	2,340.00
04/12/2024	FD	Attention to revised consent decree; attention to class action notice of consent decree and class action administration including emails to Ms. Lowry and conference with Mr. DeMuro regarding same; multiple emails to FDLaw Team comments on revisions.	1.60	625.00	1,000.00
04/12/2024	PD	Continue to work on draft Consent Decree, fielding comments from Next Friend's and consultants.	2.00	585.00	1,170.00
04/14/2024	FD	Email to Neal Gowensmith with comments on proposed revised consent decree.	0.30	625.00	187.50
04/14/2024	PD	Review and respond to emails regarding comments on draft Consent Decree.	0.50	585.00	292.50
04/15/2024	FD	Multiple emails to FDLaw Team commenting on DeMuro revised draft of Consent Decree.	0.60	625.00	375.00
04/15/2024	PD	Work on next turn of Consent Decree incorporating consultants' comments.	0.50	585.00	292.50
04/16/2024	CVW	Research and prepare draft notices for: (i) putative class members; (ii) defense counsel, family members, and legal guardians of putative class members; (iii) centralized posting; and (iv) publication; emails with Mr. DeMuro regarding same.	2.50	255.00	637.50
04/16/2024	PD	Work on draft Consent Decree; continue to incorporate experts statements into Consent Decree and related issues; work on notice issues.	2.00	585.00	1,170.00
04/17/2024	FD	Attention to multiple team emails commenting on draft revised consent decree; attention to class action administrator problem.	0.50	625.00	312.50
04/17/2024	PD	Continue work on draft Consent Decree; continue to incorporate experts statements into Consent Decree and related issues; work on notice issues.	3.00	585.00	1,755.00
04/18/2024	FD	Multiple Team emails commenting on revised consent decree.	0.40	625.00	250.00

04/18/2024	FD	Attention to identifying a class administer.	0.40	625.00	250.00
04/18/2024	PD	Work on second draft of Consent Decree; organize comments from consultant team.	1.00	585.00	585.00
04/19/2024	FD	Teleconference with Ms. Lowry regarding class action administrator.	0.30	625.00	187.50
04/19/2024	FD	Multiple emails with Team discussing consent decree.	0.40	625.00	250.00
04/22/2024	FD	Work to identify vendor for class action notice, including multiple calls; multiple emails to Mr. DeMuro and Ms. More regarding joint motion to continue stay and discussing status of work on agree consent order.	0.70	625.00	437.50
04/22/2024	PD	Work on redline comments on Consent Decree with consultants; research possible claims administrators; review and approve motion for stay and related emails.	1.50	585.00	877.50
04/23/2024	FD	Conference with Mr. DeMuro and Ms. Potts regarding preparation of notice to class members and others of settlement hearing; emails to Ms. Neal regarding delivery of list of class members.	0.50	625.00	312.50
04/23/2024	FD	Zoom conference with FDL Team reviewing and revising proposed consent decree.	1.60	625.00	1,000.00
04/23/2024	FD	Negotiating Consent Decree with Mesdames Jones and Neal.	2.20	625.00	1,375.00
04/23/2024	JMM	Review settlement order. [NO CHARGE]	0.00	420.00	No Charge
04/23/2024	LP	Conference with Mr. Dorwart and Mr. DeMuro regarding setting up website; creating mailing lists and establishing procedures for mailings of notices to class members, lawyers and court clerks; researched websites; reviewed petition and other pleadings; made appointment with the King Group on website design.	4.00	260.00	1,040.00
04/23/2024	PD	Continue to work on draft Consent Decree: prepare for and attend team meeting with consultants to add their input to the draft (1.5); emails with AGs regarding same and class list for notice purposes (.25); meet with Mr. Dorwart and Ms. Potts to outline notice plan (.5); telephone conference with possible claims administrator and follow-up emails (.25); prepare for and attend working Teams call with AGs team to work through draft Consent Decree (2.5).	5.00	585.00	2,925.00
04/24/2024	FD	Multiple emails to Ms. Potts regarding status of preparing list for notices to class members and interested parties; conference with Messrs. Walton and DeMuro discussing website.	0.40	625.00	250.00
04/24/2024	FD	Work on Consent Decree including rewrite of enforcement provisions.	1.90	625.00	1,187.50
04/24/2024	LP	Attention to researching and downloading addresses for district attorneys, public defenders and OIDS offices; emails with Mr. DeMuro and Mr. Dorwart regarding status; emails with Mr. Dorwart regarding criteria for website.	3.50	260.00	910.00
04/24/2024	PD	Continue work on next turn of draft Consent Decree incorporating all changes up to par. 59; confer with Mr. Dorwart regarding dispute resolution process (2.25); emails with JND regarding estimate to serve as class administrator; confer with Ms. Potts regarding her address list (.25).	2.50	585.00	1,462.50
04/25/2024	FD	Attention to negotiations of consent decree including multiple emails to Ms. Neat and others regarding same.	1.25	625.00	781.25
04/25/2024	PD	Continue work on draft Consent Decree: prepare for and attend second Teams call with AG to work through their comments (2.5); call with Mr. Gowensmith regarding same and issue of fines cap and final wait time limit; related emails (.25); revise draft Consent Decree to incorporate agreed to comments (1.5).	4.25	585.00	2,486.25

04/26/2024	FD	Attention to latest iteration of consent decree; multiple emails discussing website for notice of hearing on consent decree; emails of announcement of OKC facility with AARP funds.	0.60	625.00	375.00
04/26/2024	LP	Meeting with The King Group regarding website link to FDL website; emails with Ms. Seacat, Mr. DeMuro and Mr. Dorwart with details regarding website; searched OK county jails for in custody addresses for class members.	4.00	260.00	1,040.00
04/26/2024	PD	Complete changes to next draft of Consent Decree; email to AGs team and to our team with comments (2.75); setting up next AG team call (.3); emails from AG regarding news of new forensic facility in OKC (.2); work with Ms. Potts on setting up class action lawsuit site and notice issues (.25).	3.50	585.00	2,047.50
04/29/2024	FD	Attention to claims administration including emails to Mr. DeMuro and Ms. Potts regarding same.	0.25	625.00	156.25
04/29/2024	LP	Completed searches of all inmates throughout OK; updated spreadsheet; forwarded document to Mr. DeMuro.	4.00	260.00	1,040.00
04/29/2024	PD	Confer with Ms. Gowensmith regarding final days for waitlist, fines, and related issues for Consent Decree.	0.50	585.00	292.50
04/30/2024	CVW	Conferences with Mr. DeMuro regarding JND engagement for class certification process; conferences with Ms. Potts regarding same and status of locating all inmate class participants.	0.50	255.00	127.50
04/30/2024	FD	Multiple emails to Mr. DeMuro and Ms. Potts reclaims administrator; review lists of persons to whom notice should be sent prepared by Ms. Potts.	0.30	625.00	187.50
04/30/2024	PD	Confer with Ms. Gowensmith regarding final days for waitlist, fines, and related issues for Consent Decree (.5); work on class notice issues; engage JND; related emails with Ms. Potts, Ms. Wilson and JND regarding setting up website and example notices (1)	1.50	585.00	877.50

Subtotal Fees: \$58,845.00
 Contingent: (58,845.00)

Rate Summary		
Paul DeMuro	61.25 hours at \$585.00/hr	35,831.25
Frederic Dorwart	29.15 hours at \$625.00/hr	18,218.75
J. Michael Medina	0.00 hours at \$420.00/hr	No Charge
Linda Potts	15.50 hours at \$260.00/hr	4,030.00
Chantel Wilson	3.00 hours at \$255.00/hr	765.00
Total hours:	108.90	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
 Acct. Name: Frederic Dorwart, Lawyers PLLC
 Bank: Bank of Oklahoma
 Account #312977868
 Routing #103900036

Credit/Debit:
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Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 6/1/2024
 Invoice No: 148900

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 Old City Hall
 124 East Fourth Street
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9901-0033 / Investigation of OK Competency Procedures

Professional Fees		Hours	Rate	Amount
05/01/2024 FD	Review MHD's latest turn of Consent Decree with Mr. DeMuro, Zoom conference with AG negotiating Team reviewing markup; work on further document changes following Zoom negotiations; multiple emails to Mr. Gowensmith discussing definition of qualified personnel.	4.40	625.00	2,750.00
05/01/2024 PD	Work on next round of Consent Decree: prepare for Zoom call with AG's team on third draft; attend call to discuss draft and sticking points; confer with our consultants regarding wait time, fines provisions and QFE definition; redline 4th draft and send to AG's team with comments.	5.00	585.00	2,925.00
05/02/2024 FD	Attention to definition of Qualified Forensic Examiner including multiple emails regarding same; emails to Mr. Dr. Darren Lish as third Consultant.	0.40	625.00	250.00
05/02/2024 FD	Attention to recommendation to appoint Dr. Lish as third consultant.	0.20	625.00	125.00
05/02/2024 LP	Email exchange with Graham Penny regarding setup of website for claims information; submitted list of addresses collected for all class members and attorneys.	1.00	260.00	260.00
05/02/2024 PD	Continue work on draft Consent Decree: telephone conference with Steve Kunzweiler and later email sending draft Consent Decree; review proposed definition on QFE; confer with Groundswell regarding same and third consultant, Dr. Lish; related emails with AG's team.	2.00	585.00	1,170.00
05/03/2024 CVW	Emails with Mr. DeMuro regarding need for defendants' counsel to file notice of substitution for Carrie Slatton-Hodges to reflect current case caption; revise draft Joint Motion for Approval and Entry of Consent Decree regarding same reflecting appropriate named defendants in case caption; review class action member spreadsheet and research various class members for current location and status of case; emails with Ms. Potts regarding same.	1.50	255.00	382.50
05/03/2024 FD	Zoom conference with AG Team negotiating near final version of consent decree; emails regarding same.	1.40	625.00	875.00

05/03/2024	PD	Begin work on motion for preliminary approval (1); continue work on Consent Decree updating draft and conferring with expert team (2.5); attend Zoom team conference with AG team (1); confer with experts and OKDLC on final deadlines and fee issues, and propose compromise email with DMH regarding waitlist deadlines (1).	5.50	585.00	3,217.50
05/06/2024	CVW	Review file and prepare summary list of all joint motions to stay and orders granting same; email to Mr. DeMuro regarding same; email to Ms. Potts regarding notice of class member's passing (Thomas Pesina; emails with Ms. Potts and Ms. Seacat regarding need to set up class action response email.	0.60	255.00	153.00
05/06/2024	FD	Multiple emails to Mesdames Potts and Penny regarding establishing website and other support for notice to class.	0.30	625.00	187.50
05/06/2024	FD	Rework consent decree provision respecting cap on fines including emails and teleconference with Mr. DeMuro regarding same.	0.70	625.00	437.50
05/06/2024	FD	Attention to near final consent decree including multiple emails to Ms. Jones and Mr. DeMuro regarding same.	0.40	625.00	250.00
05/06/2024	JMM	Westlaw - higher standard of review issue. Office conference with Mr. DeMuro. [NO CHARGE]	0.00	420.00	No Charge
05/06/2024	LP	Set up Zoom call for Mr. DeMuro and Mr. Penny regarding website; telephone conference with Mr. DeMuro and Mr. Penny regarding logistics of dedicated web domain, dedicated phone number and email for responses; emails with Mr. Penny relaying information for template web design.	1.50	260.00	390.00
05/06/2024	PD	Make changes to Consent Decree for fines timeframes, cap and QFE, and other proof reading matters; emails with AG regarding same (3.5); work on setting up class action notice website (.5); continue work on motion for preliminary approval of Consent Decree (.5).	4.50	585.00	2,632.50
05/07/2024	CVW	Conferences and emails with Mr. DeMuro and Mr. Medina; research DG v Yarbrough case for various class action filings.	0.40	255.00	102.00
05/07/2024	FD	Work on finalizing consent decree including multiple emails with FDL and AG teams; multiple emails to Ms. Potts regarding website issues.	1.20	625.00	750.00
05/07/2024	JMM	Draft section on factors for approval research application on Rule 23 (e)(2) to (6)(2) clause. Telephone conference with Mr. DeMuro (2). [NO CHARGE]	0.00	420.00	No Charge
05/07/2024	LP	Emails with Mr. Penny from JND regarding the site for the class action notices; emails with JT and Ms. Seacat regarding unblocking the site for viewing.	0.20	260.00	52.00
05/07/2024	PD	Work on final edits of Consent Decree: drafting and Zoom call with AGs team, getting to final draft for proofing and related emails to team (2); continue to research, draft, and edit motion for preliminary approval of Consent Decree (4).	6.00	585.00	3,510.00
05/07/2024	RJC	Attention to email from Mr. DeMuro forwarding client draft consent decree for editing and proofreading; drafting email to Mr. DeMuro regarding same. [NO CHARGE]	0.00	425.00	No Charge
05/08/2024	CVW	Review next draft of Joint Motion for Preliminary Approval of Consent Decree, Class Cert and Plan Notice; email to Mr. DeMuro regarding same.	0.50	255.00	127.50
05/08/2024	FD	Multiple emails regarding Kunzweiler review of consent decree and definition of Qualified Forensic Examiner.	0.25	625.00	156.25
05/08/2024	FD	Review and comment on Joint Motion for preliminary approval; emails to Mr. DeMuro and Mr. Cipolla regarding same; email Ms. Neal regarding AG redline comments.	0.70	625.00	437.50
05/08/2024	JMM	Review motion for approval; preliminary approval; Office conference with Mr. DeMuro. [NO CHARGE]	0.00	420.00	No Charge

05/08/2024 PD	Continue to work on finalizing Consent Decree: incorporating parties and DA's proof reads and comments to "final" draft; confer with AG's team regarding logistics (2); continue to draft, research, and edit joint motion for preliminary approval of Consent Decree; confer with Mr. Dorwart regarding same; transmit to AG's team (4); meet with AD Steve Kunzweiler to get his comments on draft AG (1); set up meeting with Tulsa County Sheriff and related emails with in-jail language (.5).	7.50	585.00	4,387.50
05/08/2024 RJC	Proofreading, editing, and revising client draft consent decree in redlined format to incorporate recommended client revisions and create client draft consent decree version 1.1; drafting email to Mr. DeMuro forwarding same for review; attention to two emails from, and drafting two emails to, Mr. DeMuro regarding same; telephone conference with Mr. DeMuro regarding same.	6.20	425.00	2,635.00
05/09/2024 CVW	Review and edit draft Notice of Class Action Settlement; emails with Mr. DeMuro and Mr. Dorwart regarding same; review and edit next draft of Joint Motion for Preliminary Approval of Consent Decree, Class Cert and Plan Notice.	1.00	255.00	255.00
05/09/2024 FD	Review and comment on Joint Motion and Notice to Class; multiple emails to Ms. Neal and Mr. DeMuro regarding final drafts and reaching closure.	1.10	625.00	687.50
05/09/2024 FD	Multiple emails to Mesdames Potts and Penny regarding establishing website and content thereof.	0.30	625.00	187.50
05/09/2024 PD	Continue to work on finalizing Consent Decree and related documents: incorporate AG and FDL proof reads into Consent Decree and harmonize with rest of document; edit and finalize joint motion to approve; research and draft of class notice (5.5) meet with Tulsa County Sheriff to discuss pilot in-jail restoration program (1); Zoom call with AG's team to discuss legislative approval and related issues (.5); work with class action administrator on notice and case website issues (.25).	7.25	585.00	4,241.25
05/09/2024 RJC	Editing and proofreading client draft joint motion for preliminary approval of consent decree, class certification, and plan of notice to class; reviewing same with Mr. DeMuro; attention to email from Mr. DeMuro to Mr. Dorwart forwarding revised draft of same and revised draft consent decree for review; attention to email from, and drafting email to, Mr. Dorwart regarding prior draft inadvertently forwarded; reviewing client draft joint motion; telephone conference with Mr. DeMuro regarding same; attention to email from Mr. DeMuro to Mr. Dorwart forwarding latest draft of joint motion; proofreading and editing latest revised draft consent decree as per Mr. DeMuro's request	4.30	425.00	1,827.50
05/10/2024 CVW	Review and edit final draft of Joint Motion for Preliminary Approval of Consent Decree, Class Cert and Plan Notice; review and proof final draft Notice of Class Action Settlement; conferences with Mr. DeMuro regarding same.	0.60	255.00	153.00
05/10/2024 FD	Review and comment on Joint Motion.	0.60	625.00	375.00
05/10/2024 FD	Multiple emails regarding final consent decree, expiration of stay, all to Judge Frizzell, and legislative approval.	0.70	625.00	437.50
05/10/2024 JMM	Review order of preliminary approval. [NO CHARGE]	0.00	420.00	No Charge
05/10/2024 PD	Continue to work on final draft of Consent Decree: final edits regarding Mr. Gowensmith's comments; confer with AG's team regarding legislative approval (1.5); final edits to notice to class (.25); final edits to motion for joint approval (1); draft and edit press release (1.5); telephone conference with expert team regarding status and next steps (.75); emails with AG and Mr. Gowensmith regarding his request to add firm name rather than his as consultant (.5).	5.50	585.00	3,217.50

05/13/2024	FD	Multiple emails to Ms. Jones and Mr. DeMuro regarding Legislative approval and teleconference with Judge Frizzell; multiple emails regarding finalization and signatures on documents; DeMuro email outlining status of all action items; Ms. Jones email outlining status of obtaining Legislative approval.	0.80	625.00	500.00
05/13/2024	PD	Work on closing Consent Decree settlement: numerous telephone conferences with AG's office regarding status of legislative review and confirming email.	1.00	585.00	585.00
05/14/2024	PD	Work on press release (1); final proof read on all Consent Decree documents and joint motion (1.25); confer with AG regarding stall in Consent Decree process (.25).	2.50	585.00	1,462.50
05/15/2024	CVW	Prepare final draft filing package for Mr. DeMuro's final review; review email updates regarding case status and current standstill; emails with Ms. Potts regarding same.	0.60	255.00	153.00
05/15/2024	FD	Conference with Mr. DeMuro regarding issue with Legislative approval of Consent Decree; teleconference and emails with Ms. Santee; multiple emails to Team regarding same; email to plaintiffs regarding same; efforts to move approval forward.	1.20	625.00	750.00
05/15/2024	LP	Email exchanges with Mr. Penny from JND regarding updated site; emails with Ms. Wilson regarding case on hold.	0.25	260.00	65.00
05/15/2024	PD	Telephone conference with AG regarding news about Speaker's position; confer with Mr. Dorwart regarding same; confer with GKFF team regarding same; status emails to team and to Next Friends; confer with co-counsel regarding same.	2.75	585.00	1,608.75
05/16/2024	FD	Conference with Mr. DeMuro regarding status of legislative approval; teleconference with AG Drummond regarding same and regarding proceeding with filing of joint motion; multiple emails to Mr. DeMuro reporting case status and next steps; multiple emails to AG Staff regarding joint motion.	0.60	625.00	375.00
05/16/2024	PD	Work on closing settlement agreement: multiple telephone conferences with GKFF lobbying team regarding strategies to convince Speaker to do the deal; telephone conference with AG Drummond regarding same; telephone conference with Rep. Echols regarding same; debrief with Mr. Dorwart regarding same; review Dr. Kois's white paper on public safety aspect to consent decree.	2.50	585.00	1,462.50
05/17/2024	FD	Review Kois write-up for joint motion; multiple emails regarding same.	0.60	625.00	375.00
05/20/2024	FD	Multiple emails to Mesdames Jones and Cunningham and Mr. DeMuro regarding status of upgrades in Joint Motion; conference with Mr. DeMuro recommending drafting of upgrades.	0.60	625.00	375.00
05/20/2024	FD	Attention to Court Order regarding status conference.	0.20	625.00	125.00
05/20/2024	PD	Work with Mrs. Jones and AG's office on logistics of closing settlement; confer with Mr. Dorwart regarding same.	1.00	585.00	585.00
05/21/2024	FD	Conference with Mr. DeMuro discussing strategy and addition to Joint Motion; multiple emails to Ms. Kois regarding additional information; multiple emails to Ms. Jones regarding telephone call to discuss status; telephone call Mesdames Jones and Sears discussing status; conference with Mr. DeMuro discussing path forward; email to Mr. DeMuro to AG Drummond.	1.40	625.00	875.00
05/21/2024	PD	Work on amended joint motion to include public safety issues; review Dr. Kois report on same (1); telephone conference with AG's office regarding status of joint motion plan; debrief Plan B litigation strategy with Mr. Dorwart (1); research Governor's veto statement on SB 552 and email to AG regarding same (.75)	2.75	585.00	1,608.75
05/23/2024	PD	Confer with experts regarding June 11 Tulsa visit plans.	0.25	585.00	146.25

05/24/2024	FD	Multiple emails regarding confirmation of Commissioner and status of consent decree.	0.50	625.00	312.50
05/28/2024	PD	Emails with team regarding status of stalled Consent Decree (.2); email to AG regarding proposed language regarding public safety (.2); confer with Mr. Dorwart on strategy moving forward (.2).	0.60	585.00	351.00
05/29/2024	DWL	Telephone calls with Ms. Perkins and Mr. DeMuro regarding rescheduling status conference and attention to minute order regarding same.	0.30	440.00	132.00
05/29/2024	FD	Attention to DeMuro email to Ms. Jones regarding joint motion; conference with Mr. DeMuro discussing strategy for moving forward.	0.40	625.00	250.00
05/29/2024	FD	Attention to Judge Frizzell resetting hearing date.	0.25	625.00	156.25
05/29/2024	PD	Confer with AG's office regarding next steps; confer with Mr. Leimbach regarding communication with Court regarding hearing date; confer with Mr. Dorwart regarding all of the above.	1.00	585.00	585.00
05/30/2024	FD	Attention to change in status conference date; teleconference with Mr. Drummond regarding filing of Joint Motion; conference with Mr. DeMuro regarding filing strategy; review changes to Joint motion regarding Stitt statement.	0.50	625.00	312.50
05/30/2024	PD	Telephone conference with Attorney General regarding plan for filing the joint motion and confer with Mr. Dorwart thereafter (.25); edit joint motion to include bit about Governor's veto statement of SB 552 and related emails to AG's office (1.25).	1.50	585.00	877.50
05/31/2024	CVW	Emails and conferences with Mr. DeMuro regarding upcoming filing of joint motion for preliminary approval and recent changes to same.	0.20	255.00	51.00
05/31/2024	DWL	Confer with Mr. DeMuro regarding draft consent decree and appointment of class counsel (0.2); review draft consent decree (0.5); attention to emails regarding same (0.2).	0.90	440.00	396.00
05/31/2024	FD	Multiple emails to Ms. Jones, Ms. Moore and Mr. DeMuro regarding final additions to Consent Decree.	0.30	625.00	187.50
05/31/2024	FD	Conference with Mr. DeMuro discussing strategy for filing joint motion; teleconference with Mr. Drummond regarding same.	0.40	625.00	250.00
05/31/2024	FD	Review and comment on final draft of Joint Motion.	0.30	625.00	187.50
05/31/2024	PD	Confer with AG regarding plan to file on Monday (6/3) and edit joint motion and proposed order for filing, adding team's edits (2); litigation status updates to team and to Next Friends (.5).	2.50	585.00	1,462.50
05/31/2024	RJC	Conference with Mr. DeMuro regarding status and request for editing and proofreading of latest client draft joint motion for preliminary approval of consent decree, class certification, and plan of notice to class; attention to email from Mr. DeMuro forwarding same; drafting email to Mr. DeMuro regarding same.	0.10	425.00	42.50

Subtotal Fees: \$56,150.50
 Contingent: (\$6,150.50)

Rate Summary		
Richard J. Cipolla	10.60 hours at \$425.00/hr	4,505.00
Paul DeMuro	61.60 hours at \$585.00/hr	36,036.00
Frederic Dorwart	20.70 hours at \$625.00/hr	12,937.50
David W. Leimbach	1.20 hours at \$440.00/hr	528.00
J. Michael Medina	0.00 hours at \$420.00/hr	No Charge
Linda Potts	2.95 hours at \$260.00/hr	767.00

Chantel Wilson	5.40 hours at \$255.00/hr	1,377.00
Total hours:	102.45	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
Acct. Name: Frederic Dorwart, Lawyers PLLC
Bank: Bank of Oklahoma
Account #312977868
Routing #103900036

Credit/Debit:
<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Frederic Dorwart, Lawyers PLLC

Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103
 Phone No.: (918) 583-9922
 Tax ID: 82-1122939

Invoice as of 7/1/2024
 Invoice No: 148901

Frederic Dorwart, Lawyers PLLC
 Old City Hall
 124 East Fourth Street
 Tulsa, OK 74103

9901-0033 / Investigation of OK Competency Procedures

Professional Fees	Hours	Rate	Amount
06/01/2024 RJC Editing and proofreading latest client draft joint motion for preliminary approval of consent decree, class certification, and plan of notice to class; drafting email to Mr. DeMuro forwarding same for review.	1.00	425.00	425.00
06/03/2024 DWL Telephone call with courtroom deputy regarding upcoming status conference; exchange emails with Mr. DeMuro regarding same.	0.30	440.00	132.00
06/03/2024 FD Multiple emails to Mr. DeMuro and Team regarding status of filing consent order; conference Mr. DeMuro regarding same.	0.40	625.00	250.00
06/03/2024 PD Draft, edit, and send status reports to teams; reports with GKFF.	1.00	585.00	585.00
06/04/2024 FD Multiple emails to Mr. DeMuro reporting latest events and delay in filing joint motion.	0.25	625.00	156.25
06/04/2024 FD Email to Mr. DeMuro to Erin Moore regarding final versions of Joint Motion and Consent Decree.	0.20	625.00	125.00
06/04/2024 FD Attention to AG communication to Legislature including multiple emails to Ms. More and Mr. DeMuro regarding same.	0.20	625.00	125.00
06/04/2024 PD Emails with AGs office regarding hearing preparation and memo to legislature; related emails to my team and Next Friends; telephone conference with Hank Meyer regarding attending status hearing.	1.00	585.00	585.00
06/05/2024 CVW Preparing hearing notebook for Mr. DeMuro regarding today's status hearing.	0.40	255.00	102.00
06/05/2024 DWL Prepare for and attend status conference before Judge Frizzell.	2.00	440.00	880.00
06/05/2024 PD Prepare outline for and attend status conference, with announcement that we will reset after papers are filed.	2.50	585.00	1,462.50
06/06/2024 FD Conference with Mr. DeMuro debriefing Judge Frizzell conference and discussing next steps.	0.25	625.00	156.25
06/07/2024 FD Multiple emails with Team regarding Hernandez of OSU-DMG forensic issue.	0.25	625.00	156.25
06/07/2024 PD Emails with team regarding status of Consent Decree.	0.50	585.00	292.50
06/12/2024 FD Multiple emails regarding Dr. Hernandez report regarding Tulsa Show Cause-Teven Calloway.	0.20	625.00	125.00

06/14/2024	FD	Attention to AG email transmitting OKDMH re-trade of Consent Decree including study DMH changes, conferences x2 with Mr. DeMuro discussing same and response strategy; teleconferences x2 with Mr. DeMuro discussing telephone calls with AG; emails to Mr. DeMuro x2 to AG rejecting attempt to re-trade; teleconference with Mr. DeMuro discussing AG request for change.	1.40	625.00	875.00
06/14/2024	FD	Multiple emails to Ms. Lowry regarding termination of Foster Care Settlement Agreement.	0.30	625.00	187.50
06/14/2024	PD	Process AG's request for last minute changes; review and comment on draft; confer with Mr. Dorwart regarding same; confer with Mr. Meyer regarding same; draft, edit, and send rejecting responses to AG; telephone conference with AG regarding same.	3.50	585.00	2,047.50
06/16/2024	FD	Review and comment on final changes to consent decree; email to AG Drummond advising he approves filing on Monday.	0.40	625.00	250.00
06/16/2024	PD	Revise Consent Decree to add language regarding in jail restoration issues; related emails with Mr. Dorwart and AG.	2.50	585.00	1,462.50
06/17/2024	CVW	Conference with Mr. DeMuro regarding filing joint motion for approval and all related exhibits; final review and edits to joint motion, draft Consent Decree, draft notice, and other related exhibits; finalize and prepare same for filing; file same and email to Mr. DeMuro; edit and finalize draft Order granting Joint Motion for Preliminary Approval; confer with Mr. DeMuro for final approval; finalize and send to Court for consideration.	1.00	255.00	255.00
06/17/2024	DWL	Attention to joint motion for preliminary approval and emails related to same.	0.50	440.00	220.00
06/17/2024	FD	Attention to Mr. DeMuro emails to Plaintiffs' Team, AG Drummond, Plaintiffs' counsel, and other interested groups regarding filing of Consent Decree; conference with Mr. DeMuro regarding same; review proposed press release; emails to AG Drummond regarding filing time and multiple emails to Mr. DeMuro regarding same.	0.70	625.00	437.50
06/17/2024	LP	Emails with Mr. DeMuro regarding signed consent decree; emails with Mr. Penny regarding Zoom meeting; set up Zoom call.	0.50	260.00	130.00
06/17/2024	PD	Final proof of joint preliminary motion for approval (1.25); edit press release and deal with related media issues (.75); separate emails to Next Friends and expert team regarding status and replies (.5).	2.50	585.00	1,462.50
06/18/2024	FD	Review press releases regarding Consent Decree including Stitt denouncing the Decree; multiple conferences with Mr. DeMuro regarding various strategies for moving forward; multiple texts and office conference with Mr. Levit and Ms. Santee regarding same and regarding meeting with Stitt COS.	2.70	625.00	1,687.50
06/18/2024	PD	Work on strategy to work around Governor's opposition to Consent Decree: confer with Mr. Dorwart; meet Mr. Levit and Ms. Santee at GKFF (2.75); follow-up to set up meeting with Governor's COS (.5); confer with Appleseed regarding status (.25); investigate bad competency case in Garfield County (.5).	4.00	585.00	2,340.00
06/19/2024	FD	Email to Mr. DeMuro discussing no cap on costs of Consent Decree.	0.20	625.00	125.00
06/19/2024	FD	Multiple emails to Mr. Levit regarding Brandon Tatum.	0.25	625.00	156.25
06/19/2024	FD	Email to Mr. DeMuro with discussion themes for meeting with Brandon Tatum.	0.30	625.00	187.50
06/19/2024	PD	Work on outline of presentation to Governor's office and related emails.	2.00	585.00	1,170.00
06/20/2024	FD	Attend conference with Brandan Tatum and Trevor Pemberton in Governor's Office; multiple emails to Plaintiffs' Team regarding same; email and conference with Mr. DeMuro regarding debriefing AG regarding same.	4.40	625.00	2,750.00

06/20/2024	PD	Prepare for and attend meeting with Governor's team regarding Consent Decree; debrief with our team.	3.00	585.00	1,755.00
06/21/2024	FD	Conference with Mr. DeMuro discussing Kunzweiler/Delagado press conference and instigating OKC press conference with, Mr. DeMuro's communication to AG regarding meeting with Governor's COS; multiple emails regarding Team regarding status of joint motion.	0.30	625.00	187.50
06/21/2024	PD	Emails with expert team regarding recent contempt proceeding in Tulsa County (Tevin case); telephone conference with Garfield County PD regarding her contempt proceeding on same issue.	1.00	585.00	585.00
06/22/2024	FD	Multiple emails to Drs. Hernandez and Kois regarding ODMH roll out of new program.	0.25	625.00	156.25
06/24/2024	CVW	Receive and review Order issued by Judge Frizzell setting hearing on 8/15 and additional briefing deadline; emails with Mr. DeMuro regarding same; email to Next Friends and expert team regarding same.	0.40	255.00	102.00
06/24/2024	DWL	Attention to Order regarding hearing on motion for preliminary approval of consent decree (0.3); confer with Mr. DeMuro regarding same (0.3); plan supplemental submission (1.0).	1.60	440.00	704.00
06/24/2024	FD	Attention to Judge Frizzell order setting hearing on notice to class.	0.50	625.00	312.50
06/24/2024	PD	Study Court's Order regarding motion for preliminary approval and confer with Mr. Leimbach regarding same (.5); confer with expert consultant regarding need for affidavit to support the plan and related emails (.5).	1.00	585.00	585.00
06/25/2024	CVW	Emails with Mr. DeMuro; begin drafting Affidavit for William Neil Gowensmith.	0.50	255.00	127.50
06/25/2024	DWL	Confer with Messrs. DeMuro and Dorwart regarding anticipated supplemental submission in support of motion for preliminary approval (0.9); telephone call with co-counsel regarding same (0.2); begin outlining supplemental submission (1.0); attention to emails with co-counsel, defendants' counsel, and clients regarding same (0.2).	2.30	440.00	1,012.00
06/25/2024	FD	Office conference with Messrs. DeMuro and Leimbach review Frizzell opinion and outlining response; work on attorney fee pleading including review of invoices and research regarding fee opinions; emails to Ms. Jones regarding teleconference.	2.10	625.00	1,312.50
06/25/2024	JMM	Research (1) future member notice; (2) Frizzell attorney fee opinion. [NO CHARGE]	0.00	420.00	No Charge
06/25/2024	LP	Conference call with Mr. DeMuro, Ms. Hoorbakht and Mr. Graham regarding status of lawsuit; forwarding the Order signed 6/24/2024 to Mr. Graham for linking to the website.	0.20	260.00	52.00
06/25/2024	PD	Work on supplemental briefing on joint motion for preliminary approval: outline supplemental brief structure; meet with Mr. Leimbach and Mr. Dorwart to go over outline and divide tasks (2.5); call with co-counsel at ODLC regarding same (.2); organize call with AG's team regarding same (.2); draft and send litigation status update regarding court's order (Doc. 47) (.2); work with Mr. Dorwart in gathering and analyzing FD fee data and related emails (.5); telephone conference with JND claims administrators, advising of hearing dates and possible notice issues (.2); confer with co-counsel and ODLC regarding tasks for supplemental brief (.2).	4.00	585.00	2,340.00
06/26/2024	DWL	Videoconference with co-counsel and defendant's counsel regarding supplemental submission in response to Order (0.5); begin researching and planning components of supplement and confer with Mr. DeMuro regarding same (1.0).	1.50	440.00	660.00

06/26/2024	FD	Work on Statement Respecting Attorney Fees for response to Judge Frizzell's order including two conferences with Mr. DeMuro (.50), conferences x2 with Ms. Brewer (0.30), perform post-billing review and adjustments (2.00), and drafting proposed Statement (0.70).	3.50	625.00	2,187.50
06/26/2024	FD	Zoom Conference with Mesdames Jones, Moore, and Neel with Mr. DeMuro discussing structure of response to Judge Frizzell's order.	0.60	625.00	375.00
06/26/2024	JMM	Finish future case plaintiff research; Office conference with Mr. DeMuro - status issue. [NO CHARGE]	0.00	420.00	No Charge
06/26/2024	PD	Work on supplemental briefing on joint motion for preliminary approval: research issue of notice to future class members and adequacy of class rep when moot; confer with Mr. Medina regarding same (2); unpack court's order compared to structure of amended rule 23 and related cases (.75); organize call with experts; attend Zoom call with AGs team regarding supplemental briefing issues and tasks and debrief with team (1); confer with Mr. Dorwart regarding fee application issues (.25).	4.00	585.00	2,340.00
06/27/2024	CVW	Begin drafting Joint Supplement to Joint Motion for Preliminary Approval; emails with Mr. DeMuro regarding same.	1.00	255.00	255.00
06/27/2024	DWL	Review prior research on standing issues and confer with Mr. DeMuro regarding same (0.5); videoconference with experts regarding supplemental submission in support of joint motion and attention to related emails (1.0).	1.50	440.00	660.00
06/27/2024	FD	Conference with Mr. DeMuro regarding Trever Pemberton communication regarding consent Decree; multiple emails to Plaintiffs' team regarding status; Zoom conference with Plaintiffs' Team discussing response to Judge Frizzell Order; multiple emails to Mr. Sutherland and Mr. Wilkerson regarding documentary support of waiting times.	0.90	625.00	562.50
06/27/2024	FD	Drafting supplemental motion for attorney fees in support of Jony Motion.	2.70	625.00	1,687.50
06/27/2024	JMM	Westlaw - State cases; Research draft future class member insert. [NO CHARGE]	0.00	420.00	No Charge
06/27/2024	PD	Work on supplemental briefing on joint motion for preliminary approval: continue research and draft on notice and Rule 23 issues, including conferring with Mr. Leimbach and Mr. Medina separately (2); Zoom call with Consultants regarding responding to court order requiring explanation of remedy applicable to Class and follow-up emails to them (1); telephone conference with GC of Gov. Stitt, Trevor Pemberton, regarding possible proposal for reasonable modification and confer with Mr. Dorwart regarding same (.5)	3.50	585.00	2,047.50
06/28/2024	DWL	Confer with Messrs. DeMuro and Medina regarding class certification issues.	0.30	440.00	132.00
06/28/2024	FD	Attention to Legislative interim study including emails to Dr. Hernandez regarding same.	0.25	625.00	156.25
06/28/2024	FD	Multiple emails regarding backlog data.	0.25	625.00	156.25
06/28/2024	FD	Continued drafting of attorney fee motion.	4.00	625.00	2,500.00
06/28/2024	JMM	Research adequacies of class representation research. [NO CHARGE]	0.00	420.00	No Charge
06/28/2024	PD	Telephone conference with Vikki Behennan, OK County District Attorney (.25); work with Mr. Dorwart on fee application issues (.5); work with Mr. Leimbach on Rule 23 briefing (.25).	1.00	585.00	585.00
06/29/2024	FD	Continued drafting on motion regarding attorney fees.	0.70	625.00	437.50
06/30/2024	DWL	Conduct Westlaw research and begin drafting section of supplement to joint motion regarding legal framework for claims.	5.50	440.00	2,420.00

06/30/2024 FD	Continued drafting on motion regarding attorney fees.	0.60	625.00	375.00
		<hr/>		
		Subtotal Fees:		\$48,069.75
		Contingent:		(48,069.75)

Rate Summary		
Richard J. Cipolla	1.00 hours at \$425.00/hr	425.00
Paul DeMuro	37.00 hours at \$585.00/hr	21,645.00
Frederic Dorwart	29.05 hours at \$625.00/hr	18,156.25
David W. Leimbach	15.50 hours at \$440.00/hr	6,820.00
J. Michael Medina	0.00 hours at \$420.00/hr	No Charge
Linda Potts	0.70 hours at \$260.00/hr	182.00
Chantel Wilson	3.30 hours at \$255.00/hr	841.50
Total hours:	86.55	

Current	30 Days	60 Days	90 Days	120 Days	Total
\$0.00					\$0.00

Wiring Instructions:
 Acct. Name: Frederic Dorwart, Lawyers PLLC
 Bank: Bank of Oklahoma
 Account #312977868
 Routing #103900036

Credit/Debit:
<https://secure.lawpay.com/pages/fdlaw/operating>

PAYMENT DUE UPON RECEIPT

Exhibit 2

10/7/22 NS Meeting w/ Appleseed Competency working group - 1.0

11/4/22 NS Meeting w/ Appleseed Competency working group - 1.0

12/2/22 NS Meeting w/ Appleseed Competency working group - 1.0
12/9/22 NS Drafting Appleseed report - 3.0

2/26/23 NS Review of narratives for potential named plaintiffs - 1.0

4/12/23 NS Legal research re: response to defendants' motion to dismiss - 3.0
4/13/23 NS Drafting of response to defendants' motion to dismiss - 2.0

5/19/23 - NS Review of 1st tranche of discovery - 1.0
5/24/23 - NS and BSW Weekly conference call w/ PD, BSW and AAG team - .5
NS Review of 2nd tranche of discovery documents - 1.0
5/25/23 - NS Review of 2nd tranche discovery documents - 2.0
NS Drafting memo concerning Mateen as not a person in need of treatment - 1.0
5/31/23 NS and BSW Weekly conference call w/ AG and DMH - .5

6/2/23 NS and BSW Conference call w/ PD re: IJR statute and Mateen - .5
6/5/23 NS and BSW Conference call w/ PD and NG re: Competency Statute - .75
6/12/23 NS and BSW Call w/ PD re: Veto of SB255 - .25
6/14/23 NS and BSW Conference call w/ PD .5
6/21/23 NS Phone call w/ PD and BSW to prep for FCS meeting -.5
6/22/32 NS and BSW Meeting w/ FCS + AG - 2.0
NS and BSW Meeting w/ PD and Groundswell - 1.0

7/7/23 NS Prep for meeting w/ GCMH -1.0
7/10/23 NS and BSW Meeting w/ GCMH - 3.5
7/19/23 NS Review of second tranche of DMH emails produced in discovery - 1.5
7/21/23 NS Meeting w/ PD and Groundswell - .5
7/25/23 NS Attended show cause hearing in Tulsa County - 1.5
7/31/23 NS Prep for meeting w/ Red Rock - .75

8/1/23 NS Meeting w/ Red Rock - 2.5
8/9/23 NS Review of third tranche of DMH emails produced in discovery - 1.5
8/10/23 NS and BSW Travel to OKC for meeting w/ Turn Key - 3.0
NS and BSW Meeting w/ Turn Key & AGs - 2.0
8/15/23 NS and BSW Tour of jail w/ experts and meeting with Vic Regalado - 3.0
8/16/23 NS and BSW Tour of OFC w/ experts - 1.5
NS and BSW Meeting w/ Groundswell after OFC tour - 1.0
NS and BSW Travel time to Vinita - 2.0
8/17/23 NS consent decree research - 2.5
8/18/23 NS consent decree research - 1.0

8/21/23 NS consent decree research - 3.0
 8/24/24 NS consent decree drafting - 4.0
 8/29/24 NS consent decree drafting - 2.0

9/1/24 NS consent decree drafting - 1.5
 9/4/23 NS consent decree drafting - 3.5
 9/12/23 NS Prep for meeting w/ Grand - .5
 9/13/23 NS and BSW - Meeting w/ Grand Mental Health - 1.75
 NS and BSW - Followup meeting w/ PDM and LK - .5
 9/14/23 NS prep for meeting w/ Dr. Ardoin - 1.0
 9/15/23 NS meeting w/ Dr. from OCDC - 1.5
 9/27/23 NS Prep for meeting w/ CH - 1.0
 9/28/23 NS and BSW - Meeting w/ CH @ AG's office - 3.5
 NS and BSW Debrief of meeting w/ CH w/ experts and PD - .5

10/4/24 NS - consent decree drafting - 1.25
 10/11/23 NS - Review of proposed new forced medication legislation - .75
 10/12/23 NS - Meeting w/ CH, LK, PD - 1.5
 10/13/23 NS - Consent decree drafting - 3.0
 10/13/23 NS - Phone call w/ CH re: additions to consent decree - .5
 10/15/23 NS - Consent decree drafting - 1.0
 10/20/23 NS - Meeting w/ CH, LK, PD - 1.5
 10/23/23 NS and BSW - Review of defendant's proposed plan - 1.0
 NS and BSW - Meeting w/ PD re: defendants' proposed plan -.5
 10/26/23 NS - consent decree drafting - 2.25
 10/25/23 NS and BSW - Meeting w/ PD, and AGs - 3.0
 10/31/23 NS - Final edits to consent decree first draft for submission to PD - 1.5
 BSW - Review of consent decree - 1.0

11/2/23 NS and BSW - Pre-settlement conference meeting w/ experts - 1.0
 NS and BSW - Pre-settlement conference meeting w/ next friends - 1.0
 11/3/23 NS and BSW - Pre-settlement conference meeting w/ PD and AGs - .5
 11/6/23 NS and BSW - Settlement conference w/ AG - 3.0
 11/8/23 NS - Additional drafting of consent decree (Alameda Co.) - 1.0
 11/9/23 NS - Meeting w/ experts re: qualifications for forensic examiners - 1.0
 11/9/23 NS - Drafting consent decree 1.5
 11/10/23 NS - Incorporating experts' edits to consent decree - 2.0
 11/14/23 NS - Final edits to consent decree second draft for submission to PD - .5
 BSW - Review of consent decree - 1.0

12/8/23 NS - Review of PD's edits to consent decree for submission to AG - 1.0

1/9/24 NS and BSW - Attended zoom meeting with AG to discuss consent decree - 1.0
 1/12/24 NS - Attended show cause hearing in Oklahoma County - 2.0

2/2/24 NS and BSW - Tour of proposed pilot in-jail competency restoration facility - 2.0
NS and BSW - Meeting w/ experts after tour of proposed pilot in-jail competency restoration facility - 1.5

3/1/24 NS and BSW - Meeting w/ experts to discuss proposed IMO legislation - 1.0
3/4/24 NS and BSW - Meeting w/ AG to discuss proposed ODMHSAS legislation - 2.5

4/4/24 NS and BSW - Meeting w/ experts to pre-consent decree meeting w/ AG - 1.0
4/8/24 NS and BSW - Travel time to OKC for AG meeting - 3.0
NS and BSW - Meeting w/ Attorney General to discuss consent decree - 2.0

4/15/24 NS - Review of new draft of consent decree w/ AG's changes - 1.0
4/23/24 NS and BSW - Meeting w/ experts to discuss new draft of consent decree - 1.0
NS and BSW - Meeting w/ PD and AG to review consent decree pt. 1 - 2.0

4/25/24 NS - Meeting w/ PD and AG to review consent decree - 2.0

Exhibit 3

FREDERIC DORWART

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(918) 688-9961 - Cell
OBA No. 2436
fdorwart@fdlaw.com

EDUCATION:

- Legal: L.L.B., cum laude, Harvard Law School, 1966. Best Brief Award, moot court competition; Best Oralist Award, moot court competition.
- Pre-Legal: B.S. in Engineering with Distinction, U.S. Naval Academy, 1959. Commander, Fourth Company Midshipmen; District VII intercollegiate debate champion, 1958; outstanding debater award, Northwestern University National Debate Tournament, 1958 (and various others 1956-59).

Muskogee Central High School, magna cum laude: Oklahoma state and U.S. national high school extemporaneous speaking champion, 1954; University of Oklahoma Beard Memorial Award for outstanding Oklahoma high school speech student, 1954; Oklahoma high school debate champion, 1954.

EMPLOYMENT:

- Present: Frederic Dorwart, Lawyers PLLC: Founder (1994), Managing Member (1994-2020), Member (2020-Present); General Counsel, BOK Financial Corporation (1991-2021), Tulsa Community Foundation and George Kaiser Family Foundation (1999-2021), Kaiser-Francis Oil Company (1967-2020); Oil and Gas Investments.
- 1989-1994: Holliman, Langholz, Runnels & Dorwart: Of Counsel, law.
- 1967-1989: Holliman, Langholz, Runnels & Dorwart: President, law.
- 1967-1989: Stockholder, Director and Officer of various manufacturing concerns with sales offices and manufacturing plants in Oklahoma, Texas, Louisiana, Colorado, Canada, Hong Kong, Scotland, Singapore and Belgium.

MILITARY SERVICE

- 1959-1965: Lieutenant, United States Navy: Heavy Cruisers, U.S.S. Newport News CA-148 (1959-61): Main Engines Officer; Officer of the Deck Underway, CIC Watch Officer, and Engineering Watch and Duty Officer. Destroyers, U.S.S. Turner DDR-834 (1961-63): Operations Officer; Officer of the Deck Underway, Command Duty Officer and Anti-submarine Air Control Officer; Officer Candidate School, Newport, Rhode Island (Summers 1964 and 1965): Instructor in Naval Tactics.

COMMUNITY:

- The University of Tulsa, Chairman, Board of Trustees (2019-2021), Trustee (2010-2022), Trustee Emeritus (2022-current); Chairman and Advisory Director (2004-2012), University of Tulsa Undergraduate Research Challenge
- The University of Tulsa, Outstanding Business Leader, Collins College of Business Hall of Fame, (2017); College of Law Hall of Fame (2015)
- Frederic Dorwart Chair in Energy Law, University of Tulsa College of Law
- Tulsa Historical Society Hall of Fame (2015)

Organizer of Tulsa Stadium Trust Improvement District and General Counsel to Tulsa Stadium Trust (2008-Present)

Developed Structure and Organization for Construction and Operation of A Gathering Place for Tulsa, GKFF and River Parks Authority (2010-Present)

Organizing Trustee (1999), Tulsa Community Foundation

Organizing Trustee and President (2000-Present), George Kaiser Family Foundation

Vice-President, Treasurer and Director (2004-Present), Tulsa Educare, Inc.

Tulsa Regional Chamber, Volunteer of the Year (2009), Director (2012-2020)

Oklahoma Bar Association, Alma Wilson Award for Service to Children (Co-Lead Counsel, D. G. v Oklahoma Department of Human Services, USDC OKND, 2007-2012)

Principal Drafter, 1995 Oklahoma Tort Reform Act (12 O.S. 1101.1; 23 O.S. 9.1)

Drafter, Tourism Improvement District Act (11 O.S. 39-103.1); Organizer, Tulsa Tourism Business Improvement District No.1, 2010.

Commissioner (1990-2007), Tulsa Housing Authority

Director and Chairman of the Board (1982-1986), Operation Aware of Oklahoma

President (1976-1977), Director (1971-1977) and Advisory Director (1978-Present) Tulsa Family and Children's Service, Inc.

Member (1977 - 1981), Budget Executive Committee of Tulsa Area United Way

President (1978 - 1980), Holy Family Cathedral Parish Council

Director, (1980 - 1981), Community Service Council

Co-Founder and Member (1974 - Present), International Society of the Energy Advocates

President (1969-1971), Harvard Law School Association of Oklahoma; Member, Harvard Law School Annual Gift Committees

Master (1987-Present), Council Oak Tulsa Chapter, Inns of Court

Trustee (1985-2003) and President (1987-1992); Man of the Year (1991), American Morgan Horse Association

Inaugural Honoree (2024), Indian Nations Troop, Scouting America, Annual Frederic Dorwart Community Impact Award

PERSONAL:

Date of Birth: January 31, 1937; Married, Reine-Anne (Nanu) Dorwart, July 21, 1962 (deceased, November 26, 2019).

Exhibit 4

PAUL DEMURO
FREDERIC DORWART, LAWYERS PLLC
Oklahoma Bar No. 17605
New Mexico Bar No. 7512
Colorado Bar No. 56830

EDUCATION:

Legal: UNIVERSITY OF NEW MEXICO SCHOOL OF LAW, J.D.
magna cum laude, May, 1993; Class Rank: 2 of 110.

Academic Awards and Activities: Order of Coif; Notes and Comment Editor, UNM Law Review; Seven Top Grade Awards; Julia Raymond McCullouch Constitutional Law Award; Clinical Law Award; West Outstanding Scholarship Award; National Health Law Moot Court Team, 1990-91.

Pre-Legal: PRINCETON UNIVERSITY, B.A., United States History, 1987

Activities: Intercollegiate Varsity Football, 1983-1987; Officer, Tiger Inn Eating Club, 1986-87.

EMPLOYMENT:

1997-Present: Frederic Dorwart, Lawyers, Tulsa, Oklahoma; Senior Trial Attorney in mid-size firm responsible for defending and prosecuting complex commercial matters and tort cases. Significant jury experience. Obtained multi-million dollar verdicts and settlements in a variety of commercial settings. Responsible for defense of state-wide oil and gas class action litigation.

1995-1996: Campbell, DeMuro & Snyder, L.L.P., Albuquerque, New Mexico; general partner in firm concentrating in commercial and personal injury litigation and criminal defense.

1993-1995: Randi McGinn & Associates, P.A., Albuquerque, New Mexico; associate in small litigation firm concentrating in personal injury, civil rights and criminal defense.

1988-1990: National Center on Institutions & Alternatives, San Francisco, California; directed pretrial release program for San Francisco County Jails; private sentencing consultant.

GENERAL PROFESSIONAL BACKGROUND

Admitted to New Mexico Bar October 1993. Admitted to Oklahoma Bar September 1997. Admitted to Colorado Bar November 2021. Admitted to practice in United States District Court for the Districts of New Mexico, Arizona, Northern Oklahoma, Eastern Oklahoma, Western Oklahoma, Northern Illinois, Northern Texas, and Southern Texas. Admitted to Ninth Circuit Court of Appeals, Tenth Circuit Court of Appeals, and Supreme Court of the United States of America.

PROFESSIONAL ASSOCIATIONS AND ACTIVITIES:

Fellow, American College of Trial Lawyers

Criminal Justice Act Panel Attorney for U.S. District Court for Northern District of Oklahoma

Adjunct Settlement Judge for the U.S. District Court for Northern District of Oklahoma

Member: Litigation Counsel of America; National Association of Criminal Defense Lawyers; American Trial Lawyers Association; Oklahoma Trial Lawyers Association; Tulsa County Bar Association; Inns of Court (Council Oak/Johnson-Sontag Chapter).

Editorial Board: New Mexico Trial Lawyer, Book Review Editor, 1995 - February, 1996.

PUBLICATIONS:

"The New Mexico Worker's Compensation Act 1991", 21 N.M.L. Rev. 620 (1993); "The 1994 Amendments for the Federal Rules of Civil Procedure, New Mexico Trial Lawyer, May, 1995; "The 911 of Trial Handbooks, New Mexico Trial Lawyer, Aug., 1995; "Dull Doctors Make Dull Videos, New Mexico Trial Lawyer, May, 1996.

Exhibit 5

DAVID W. LEIMBACH

124 East Fourth Street, Tulsa, Oklahoma 74103
(918) 583-9922 • DLEIMBACH@FDLAW.COM

EDUCATION

COLUMBIA LAW SCHOOL, New York, NY — Juris Doctor, June 2013

Honors: Harlan Fiske Stone Scholar

Activities: *Columbia Science and Technology Law Review*

DARTMOUTH COLLEGE, Hanover, NH — Bachelor of Arts, *cum laude*, May 2010

Majors: Mathematics and Philosophy

Honors: Francis W. Gramlich Prize in Philosophy

BAR ADMISSIONS

State: Oklahoma, New York

Federal: Northern, Eastern, and Western Districts of Oklahoma; Southern and Eastern Districts of New York; Southern and Eastern Districts of Texas; District of New Mexico; Tenth Circuit Court of Appeals

PROFESSIONAL EXPERIENCE

FREDERIC DORWART, LAWYERS PLLC, Tulsa, OK

Member (November 2021 – Present); *Associate* (December 2019 – November 2021)

Represent clients in wide range of litigation matters in federal and state courts.

THE HON. GREGORY K. FRIZZELL, U.S.D.J., Northern District of Oklahoma

Judicial Law Clerk (September 2018 – September 2019)

Researched and analyzed legal issues; prepared draft opinions, jury instructions, and other judicial documents; assisted with both civil and criminal cases.

THE HON. JUDITH C. MCCARTHY, U.S.M.J., Southern District of New York

Judicial Law Clerk (September 2017 – August 2018)

Assisted four-week jury trial on complex financial claims; assisted jury trial in section 1983 case; prepared draft orders and opinions.

HERBERT SMITH FREEHILLS LLP, New York, NY

Associate (October 2014 – March 2017)

Represented clients in civil litigation in federal and state courts.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP, New York, NY

Associate (September 2013 – October 2014); *Summer Associate* (2012)

Represented clients in various complex commercial litigation matters.

MEMBERSHIPS

Oklahoma Bar Association

Hudson-Hall-Wheaton American Inn of Court

Exhibit 6

Nicholas Southerland

3842 S. Trenton Ave.
Tulsa, OK 74105

nicholas.southerland@gmail.com

(918) 607-0897
Missouri Bar No. 66248
Oklahoma Bar No. 31234

Work Experience

November 2020 - Present

Staff Attorney, Oklahoma Disability Law Center, Inc., Tulsa, OK

- Lead counsel on class action lawsuit against the Department of Mental Health seeking to eliminate unconstitutional wait times for criminal defendants found incompetent to stand trial to receive competency restoration treatment.
- Worked closely with state and federal agencies to obtain positive outcomes for clients with mental and physical disabilities.
- Worked to enforce the rights of employees, tenants and incarcerated persons under the Americans with Disabilities Act, the Rehabilitation Act, and relevant state law.

August, 2019 - November, 2020

Assistant Public Defender, Tulsa County Public Defender's Office, Tulsa, OK

- Handled all types of criminal felony cases from initial client interviews through preliminary hearing and jury trial, including drafting and filing all relevant motions.

June, 2015 - August, 2019

Assistant Public Defender, Oklahoma County Public Defender's Office, Oklahoma City, OK

- Managed felony docket averaging 75-90 active cases in addition to a felony revocation docket.
- Tried over twenty-five felony cases to juries, including five first degree murders.
- Made court appearances to conduct preliminary hearings, revocation hearings, bond motions, competency proceedings and evidentiary hearings.

June, 2013 - June, 2015

Contract Attorney, Sindel Sindel & Noble, St. Louis, MO

- Engaged in capital post-conviction relief work, including mitigation work, legal research and motion drafting.

August 2012 - June, 2013

Associate Attorney, Coffey, Gudgel & McDaniel, PLLC, Tulsa, OK

- Performed legal research and drafted memoranda on a variety of legal issues in practice areas including insurance defense, contract disputes, employment and construction law.
- Drafted coverage opinions, contracts, briefs, motions for summary judgment and probate pleadings.

Education

University of Tulsa School of Law, Tulsa, Oklahoma, J.D., May 2012

University of Oklahoma, Norman, Oklahoma, B.A. with distinction, May 2009

Exhibit 7

BRIAN S. WILKERSON
10105 S. Hudson Ave. • Tulsa, Oklahoma 74137
(C): 918-924-2567 • brian@okdlc.org

PROFILE

Accomplished trial litigator experienced in all aspects of case management including pre-trial preparation, mediations and alternate dispute resolution procedures. Proven ability to negotiate complex transactions. Licensed to practice in Oklahoma, all three Federal District Courts in Oklahoma and Muscogee (Creek) Nation Tribal Court.

LEGAL EXPERIENCE

Oklahoma Disability Law Center

Director of Litigation and Legal Services, July 2018 – Present

- Lead counsel on class action lawsuit against the Department of Mental Health seeking to eliminate unconstitutional wait times for criminal defendants found incompetent to stand trial to receive competency restoration treatment.
- Represent individuals with disabilities in federal, district and administrative courts.
- Management and daily coordination of litigation and legal services for individuals with disabilities in the state of Oklahoma.
- Supervision of legal advocates and staff attorneys on active case assignments.
- Conducting monthly file reviews with legal advocates and staff attorneys to ensure the quality of legal services provided.
- Hiring of legal advocates and staff attorneys.
- Conduct annual performance evaluations of legal advocates and staff attorneys.
- Identify, initiate, and coordinate systemic litigation projects.

Wilkerson Law Firm, P.C.

Owner, 2010 – July 2018

- Management and operation skills include budgeting, scheduling, bidding and securing contracts and private accounts.
- Handle complex deprived child and family drug court cases for Tulsa County District Court, Juvenile Division and Muscogee (Creek) Nation Tribal Court.
- Represent criminal defendants in District Courts.
- As Member of Oklahoma Juvenile Uniform Jury Instruction Rewrite Committee, worked collaboratively with State Judges, Prosecutors, Public Defenders, private attorneys and the Supreme Court of the State of Oklahoma, to amend and codify the uniform jury instructions to be used in all juvenile court proceedings.

Riggs, Abney, Neal, Turpen, Orbison & Lewis, Attorneys at Law

Associate Attorney, 2006 -2010, 1997 - 2000

- Member of legal team representing the State in protection of water quality in Oklahoma rivers.
- Handle complex deprived child and family drug court cases for Tulsa County District Court, Juvenile Division and Muscogee (Creek) Nation Tribal Court.
- Represented diverse clientele in both civil and criminal litigation.
- Represented state employees in employment disputes before the State Merit Protection Commission.
- Member of Oklahoma Juvenile Uniform Jury Instruction Rewrite Committee.

Wilkerson, Wassall, Warman, Attorneys at Law

Associate Attorney, 2000 - 2006

- Handle complex deprived child and family drug court cases for Tulsa County District Court, Juvenile Division and Muscogee (Creek) Nation Tribal Court.
- Represented diverse clientele in both civil and criminal litigation.
- Represented state employees in employment disputes before the State Merit Protection Commission.

- Member of Oklahoma Juvenile Uniform Jury Instruction Rewrite Committee.

EDUCATION

University of Oklahoma
Juris Doctor, 1996

Trinity University
Bachelor of Arts 1993

COMMUNITY INVOLVEMENT

Autism Center of Tulsa, 2005 – 2018

Jenks Public Schools, 2003 - 2019

Metro Tulsa Soccer Club, Disabled Soccer Program Director & Coach, 2004 – 2009

Nature Conservancy, Sutton Avian Research Center, Wild Brew Committee Member 1998 – 2009

Exhibit 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) LESLIE BRIGGS, as next friend of T.W.)
and B.S.;)
(2) EVAN WATSON, as next friend of C.R.;)
and,)
(3) HENRY A. MEYER, III, as next friend)
of A.M., for themselves and for others)
similarly situated,)

Plaintiffs,)

v.)

Case No: 23-cv-81-GKF-JFJ

(1) ALLIE FRIESEN in her official capacity)
as Commissioner of the Oklahoma)
Department of Mental Health and)
Substance Abuse Services; and)
(2) DEBBIE MORAN, in her official)
capacity as Interim Executive Director of the)
Oklahoma Forensic Center,)

Defendants.)

AFFIDAVIT OF FREDERIC DORWART

Frederic Dorwart, upon being duly sworn and having personal knowledge of the matters contained herein, hereby states as follows:

1. I was graduated from the United States Naval Academy with a Bachelor of Engineering With Distinction in 1959 and from Harvard Law School with a LLB Cum Laude in 1966. Since 1966, I have practiced law in the State of Oklahoma. I practiced as sole proprietor of Frederic Dorwart, Lawyers from 1994 until 2017 and as an equity owner in Frederic Dorwart, Lawyers PLLC from 2017 to today (collectively, "FDLaw"). I was General Counsel of BOK Financial Corporation from 1991 until 2021.

2. In my practice I have been involved extensively in reviewing lawyer time records and preparing and collecting billings of FDLaw. I have also frequently engaged other lawyers from time to time and reviewed the billings of those lawyers for fairness.

3. The work done and being done in this case by FDLaw was and is being done *pro bono* with no expectation of payment for it, except as provided by 42 U.S.C. § 1988.

4. I personally performed a pre-billing review of the billings of FDLaw incurred in this case from October 2023 through July 15 to determine if any work was duplicative or unnecessary to the prosecution of this case. In that pre-billing review, I charged off \$22,494.50; otherwise, all the time recorded was reasonable and necessary for the prosecution of this case.

5. Exhibit 1 to the Unopposed Supplemental Motion for Preliminary Approval of Attorney Fees are the contemporaneously prepared time records for work done by FDLaw in this case reflecting the pre-billing adjustments.

6. In my opinion, the FDLaw time records properly record the actual work done by FDLaw and, in my opinion, that work, properly adjusted for duplicative and unnecessary work, was reasonably required.

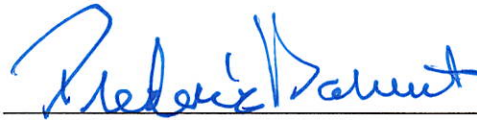
7. In my opinion, the hourly rates billed by FDLaw are fair, reasonable, and consistent with hourly rates charged within the Tulsa legal community in by lawyers of comparable experience and skill.

8. I personally performed the data analysis set forth in the Unopposed Supplement Motion to which my Affidavit is attached as Exhibit 8. The data analysis is true and correct based on the stated assumptions.

9. Based on my experience in assessing the reasonableness of fees, I am of the opinion that the enhancements discussed in the Unopposed Supplement Motion are substantially more than fair and reasonable.

I affirm under penalty of perjury under the laws of Oklahoma that the foregoing is true and correct to the best of my knowledge.

Further Affiant Sayeth Naught.



Frederic Dorwart

Subscribed and sworn to before me this 25 day of July, 2024.



Notary Public

My Commission Expires:

08/12/2026

