

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MICHAEL MUEHE, ELAINE HAMILTON,  
CRYSTAL EVANS, and COLLEEN  
FLANAGAN, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

CITY OF BOSTON, a public entity,

Defendant.

Case No.: 1:21-cv-11080-RGS

**DECLARATION OF THOMAS P. MURPHY IN SUPPORT OF  
MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Thomas P. Murphy, hereby declare:

1. I am a member in good standing of the Bar of the State of Massachusetts and a Senior Attorney at the Disability Law Center, Inc. ("DLC"), in Boston and Northampton, Massachusetts. I have been actively engaged in the practice of law since 1995. I am co-counsel for Plaintiffs and the members of the Plaintiff Class and am providing this declaration of counsel in support of the Plaintiffs' Motion for Attorneys' Fees and Costs. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them.

2. DLC is a private non-profit organization, and the designated Protection and Advocacy ("P&A") system for people with disabilities in Massachusetts, pursuant to federal statutory authority. *See, e.g.*, 29 U.S.C. § 794e (persons with disabilities, including physical disabilities), 42 U.S.C. § 15001 (people with developmental disabilities), and 42 U.S.C. § 10801 (people with mental illness). DLC's core mission includes advocacy on issues of civil rights and public access for people with disabilities living in the community, as well as non-

discrimination in the provision of government services.

3. The Protection and Advocacy systems were created by Congress to provide independent advocates for people with disabilities in each state and territory. DLC's mandates expressly provide DLC with the federal authority to pursue legal, administrative, and other appropriate remedies to ensure enforcement of our constituents' federal and state rights. *See* 42 U.S.C. § 15043 (a)(2)(A)(i), 29 U.S.C. § 794e (f)(3). Pursuant to its federal mandates, DLC routinely conducts systemic investigations and advocates based upon the finding of those investigations. That advocacy comes in a variety of forms, including affirmative impact litigation.

4. DLC attorneys have represented individuals with disabilities in numerous systemic and class action cases, including: *Briggs, et al. v. Mas. Dep't of Corr., et al.*, No. 1:15-cv-40162 (D. Mass.) (involving access of deaf and hard of hearing prisoners to appropriate accommodations); *Disability Law Ctr. v. Mass. Dep't of Corr., et al.*, 960 F. Supp. 2d 271, 280-81 (D. Mass. 2012) (involving diversion from solitary confinement for prisoners with mental illness); *Sabbag, et al. v. Swift*, No. 1:01-cv-12211 (D. Mass.) (involving access to home-based private duty nursing services for children with severe disabilities); and *Rolland v. Cellucci*, 198 F. Supp. 2d 25 (D. Mass. 2002) (involving community placement and specialized services for individuals with intellectual and developmental disabilities in nursing facilities). DLC has also litigated many cases in Massachusetts state and federal courts involving physical access, such as *Berry v. City of Lowell*, 2003 WL 22050772 (D.Mass. 2003), *Pyramid Co. v. Architectural Barriers Board*, 403 Mass. 126 (1998), and *Hasbrouck v. MBTA*.

5. I graduated from Villanova University with a B.S. in Business Administration in 1992 and Boston University School of Law in 1995. I was admitted to practice law in

Massachusetts in December 1995. I have worked in the Civil Rights Division of the Massachusetts Office of the Attorney General and at the Massachusetts Commission Against Discrimination (“MCAD”). Then, after working in a private practice, I joined DLC in 2005.

6. I have been class counsel in the matters of *National Association of the Deaf, et al. v. Harvard University*, 377 F.Supp.3d 49 (D.Mass. 2019) and *National Association of the Deaf, et al. v. Massachusetts Institute of Technology*, 2019 WL 1409301 (D.Mass. 2019).

7. Beyond these class actions, I have represented individuals in employment and housing discrimination cases, as well as cases involving disability access in places of public accommodation and by public entities, before federal and Massachusetts courts and administrative agencies. I have litigated many civil rights and disability rights cases, including: *Cherry, et al. v. Hampton Properties, LLC*, No. 4:16-cv-40048 (D. Mass.); *Bratton v. CSX*, No. 07-11515-WGY (D. Mass.); *Greer v. Boston University*, No. 02-11898-MLW (D. Mass.); *Frank v. Brookside Condo Association* (Mass. Super. Ct.); *Jackman v. Securitas* (MCAD); *Devin v. Kindred Hospital* (MCAD); *Jones v. MBTA* (MCAD); *Shuster v. Great Barrington Rudolph Steiner School* (MCAD); *Zappala v. Monterosa of Stoneham* (MCAD); and *Albanese v. Co-Ri, Inc.* (MCAD). I am also engaged in structured negotiations on behalf of a proposed class in a matter involving improved access for individuals with disabilities. I have authored publications on disability rights and regularly train attorneys, advocates and individuals on disability rights, including programs at Massachusetts Continuing Legal Education (MCLE).

8. Other DLC attorneys who have worked on this case include Stanley Eichner. Attorney Eichner was the Director of Litigation at DLC until April 2019. He graduated with a Bachelor of Arts from Boston University in 1971, and with a J.D. from Washington University

School of Law in 1974. He then worked as a partner at the firm Taylor, Eichner, Hollander and Platke from 1974 to 1977, specializing in civil rights and labor law matters. He was a Senior Staff Attorney at Legal Services of Eastern Missouri from 1977 to 1983, working on complex law reform litigation in state and federal courts, notably as lead counsel in the matter of *Hensley v. Eckerhart*, 461 U.S. 424 (1983), before the U.S. Supreme Court. Attorney Eichner worked for the Commonwealth of Massachusetts as an Assistant Attorney General and Director of the Disability Rights Project at the Office of the Massachusetts Attorney General; as the Director of Disability Program Development at the Executive Office of Health and Human Services; and as General Counsel at the Executive Office of Elder Affairs. At DLC, he held the positions of Senior Staff Attorney, Executive Director, and throughout this case, Director of Litigation. Attorney Eichner has extensive experience in litigating civil rights matters, including cases involving special education, employment discrimination and public accommodations discrimination. Notable cases include: *Rundle v. Humane Society*, 12 FEP 444 (E.D. Mo. (1975) (Title VII sex discrimination suit); *St. Louis DDTC Parents' Assoc. v. Mallory*, 591 F. Supp. 1416 (W.D. Mo. 1984), aff'd 767 F.2d 518 (8th Cir. 1985); *R.W.T. v. Hon. D.E. Dalton*, 712 F.2d 1225 (8th Cir. 1983); and *Commonwealth v. Adams*, 416 Mass. 558 (1993) (expanding the application of the Massachusetts Civil Rights Act to new issues, including police misconduct). At DLC, Attorney Eichner was lead counsel in the series of structured negotiations with the area's three largest banks, (*Fleet, Sovereign, and Citizen's*), which resulted in agreements granting full access to banking services for individuals who are blind or have low vision, co-counsel in the successful structured negotiations with the streaming service *Hulu*<sup>1</sup> resulting in the provision of audio description tracks for streaming content, and co-counseled a successful stadium accessible seating lawsuit in federal court (*Berry v. Lowell*, 2003 WL 22050772

(D.Mass. 2003). Attorney Eichner has also authored numerous publications on disability rights and trained attorneys, advocates and individuals both locally and nationally on disability rights.

9. In addition to Attorneys Murphy and Eichner, DLC's Executive Director, Director of Litigation, and Director of Advocacy, as well as administrative staff and interns have assisted with strategy discussions, legal research, document reviews and fact development relevant to the demand letter and resulting Consent Decree. However, DLC has chosen not to request reimbursement for their time.

10. The following descriptions of the work performed on the Plaintiffs' behalf represent the actual number of hours recorded on daily timekeeping records. Each DLC attorney contemporaneously recorded his time to the 1/10<sup>th</sup> of an hour, or 6-minute increments, for all activities, regardless of whether the activity involves litigation or will be deemed compensable at some later date. The time requested includes only time spent on tasks directly related to this litigation, non-duplicative tasks, and work necessary to obtain the favorable result of this case, and excludes time spent on tasks that could be considered inefficient or unnecessary, and does not represent time spent by individuals noted in Paragraph 9, above other than Attorneys Murphy and Eichner.

11. DLC has long been aware of difficulties faced by individuals with disabilities in navigating the City of Boston's pedestrian right of way through both complaints and observation. However, unlike the work done by an individual lawyer for an individual client, representing a class of thousands of individuals with mobility disabilities to enforce federal and state accessibility standards is necessarily complex and time consuming, and our limited resources, combined with our broad federal mandate, have combined to inhibit our ability to take on a case of this magnitude until forming a partnership with our co-counsel.

12. DLC attorneys have been actively involved on all aspects of this case since its inception. The following is a brief summary of the work conducted from March 2017 to the present by the DLC attorneys representing the class.

13. Prior to sending the City of Boston (hereinafter “the City”) a demand letter, we conducted intensive fact development with co-counsel, including requesting and reviewing current and historic public records regarding curb ramps and verified non-compliant ramps by conducting on-site assessments and developing data for the Microsoft Access database that was created specifically for this matter. We conducted legal research and reviewed prior curb ramp cases and settlements. As local counsel in this matter, we handled all research associated with First Circuit case law and local U.S. District Court rules.

14. DLC conducted extensive outreach to potential plaintiffs and class representatives to gather and document facts and personal experiences regarding the impact of the City’s failure to comply with federal and state law with regard to its pedestrian right of way and access to the City’s programs, services and activities. Notably, DLC served as the primary contact for the named Plaintiffs and continuously kept them apprised of developments in the case and elicited feedback regarding the status of negotiations.

15. After conducting this fact development, DLC worked closely with Plaintiffs and co-counsel to document our concerns regarding the City’s lack of accessible curb ramps in a detailed demand letter and invitation to the City to engage in structured negotiations.

16. After documenting the City’s lack of compliance and participating in conference calls with opposing counsel, we engaged in structured settlement negotiations with the City for nearly three years to agree on and develop a Consent Decree and reasonable compliance plan.

17. Throughout the structured negotiations process, we participated in numerous in-

person meetings and conference calls, exchanged written and electronic communications, and requested, exchanged and analyzed a vast amount of relevant information about the City's policies, structure, practices, finances, design and construction standards and other protocols. We also provided input into the City's proposal for surveying the existing pedestrian right of way. We used the factual information gathered to prepare for and attend each of the structured negotiation settlement meetings. We also provided input into the numerous draft term sheets and Consent Decree documents prepared and exchanged with counsel for the City throughout the negotiations.

18. DLC attorneys collaborated with co-counsel to draft the pleadings in this matter, including the Complaint, Motion for Preliminary Approval, and Plaintiffs' Declarations. We also handled the filing of case opening pleadings and *pro hac vice* motions. We also took part in the drafting of the Class Notice and played a lead role in the research and development associated with identifying Notice of Settlement recipients.

19. Attached hereto as Exhibit A and incorporated herein by reference is a true and correct copy of DLC's time records on this matter through August 25, 2021, for which DLC is seeking compensation.

20. I have reviewed DLC's billing records on an entry-by-entry basis to exercise billing judgment and excise inefficient or duplicative work, clerical entries, work performed by the individuals identified in Paragraph 9 above, and other billing entries that are otherwise inadequate or non-compensable. This reduced the overall lodestar by almost 10%.

21. DLC is requesting its regular billing rates to calculate fees for this matter, which are based on reasonable rates established exclusively for legal services organizations in Massachusetts by the Massachusetts Law Reform Institute (MLRI), rather than the prevailing

rates for private law firms. DLC's rates have recently been approved by courts in this jurisdiction, including in *NAD et al. v. Harvard University*, No. 3:15-cv-30023-KAR (Feb. 26, 2020) (ECF No. 218) and *NAD et al. v. Massachusetts Institute of Technology*, No. 3:15-cv-30024-KAR (Jul. 21, 2020) (ECF No. 217).

22. The following table accurately sets forth the timekeepers at DLC who worked on this matter; their graduation dates; their hourly rates that we are seeking; and the number of hours that they worked, after the exercise of billing judgment:

<b>Name</b>	<b>Position</b>	<b>Years of experience/graduation year</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Stanley Eichner	Director of Litigation	45 years/1974	26.7	\$575	\$15,352.50
Thomas Murphy	Senior Attorney	25 years/1995	170.9	\$500	\$85,450.00
<b>DLC Lodestar</b>					<b>\$ 100,802.50</b>

23. The above figures do not include time that I will continue to incur over the next two months through the final approval of the Consent Decree. I estimate that I will spend an additional 8 hours on such work.

24. DLC also expended a total of \$702.00 in reasonable costs in the prosecution of this case which consists of expenditures for court filing fees. DLC's costs are minimal given that the parties engaged in structured negotiations in order to achieve a result which will benefit thousands of individuals with mobility disabilities. Attached hereto as Exhibit B and incorporated herein by reference is a true and accurate accounting of DLC's expenses in this matter through August 25, 2021 for which DLC is seeking compensation.

25. DLC has not received any compensation to date for its work on this case. Any compensation DLC receives in this case will be dependent on the award of attorneys'



fees by this Court. None of the fees or costs paid to DLC will directly benefit any of the DLC attorneys who worked on the case. Instead, all fees and costs are distributed back into the programs that fronted the costs to begin with in order to fund future work in fulfillment of our mission and responsibilities as the Protection and Advocacy system for Massachusetts.

26. All expenses and costs incurred were necessary for the negotiation and litigation of Plaintiff's claims, and are appropriate given the scope and complexity of this matter. A true and correct itemization of the costs and expenses for which DLC is seeking reimbursement is attached hereto as Exhibit B and incorporated herein by reference.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Declaration was executed this 26th day of August, 2021, in Northampton, Massachusetts.



Thomas P. Murphy  
BBO No. 630527  
Disability Law Center, Inc.  
32 Industrial Drive East  
Northampton, MA 01060

*Attorney for Plaintiff and the Plaintiff Class*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated on the NEF as non-registered participants on August 30, 2021.

/s/ Raymond Wendell

Raymond Wendell

# **EXHIBIT A**

ID	Type	Date	Elapsed Time	User	Description
18593	Hours Worked	3/9/2017	0.2	Stan Eichner	Send accessibility study to team w/ cover email
35002	Hours Worked	7/27/2017	0.9	Stan Eichner	Conference call with counsel; review of the data received and analyzed; dividing up tasks
35003	Hours Worked	7/27/2017	0.1	Stan Eichner	Follow up conversation w/ TM re task assigned and offer of help
53802	Hours Worked	2/1/2018	0.6	Stan Eichner	Conference call with Tim F., Linda D., TM and RG
57977	Hours Worked	3/15/2018	0.4	Stan Eichner	Conference call w/ co-counsel, TF, and TM and follow up email
60317	Hours Worked	4/4/2018	0.2	Stan Eichner	Emails about photo taking on Monday
60610	Hours Worked	4/9/2018	2	Stan Eichner	Traveling to So. Boston and finance district and take pictures of non-conforming curb ramps and intersections
61028	Hours Worked	4/12/2018	0.4	Stan Eichner	Telephone calls with Plaintiff Colleen F. and TM
63625	Hours Worked	5/7/2018	0.5	Stan Eichner	Communication and call w/ co-counsel - TF
70125	Hours Worked	7/9/2018	0.4	Stan Eichner	Telephone call with co-counsel
70126	Hours Worked	7/9/2018	0.6	Stan Eichner	Initial telephone call with the City
77741	Hours Worked	10/1/2018	0.3	Stan Eichner	Emails about agenda and meeting with Boston
78537	Hours Worked	10/10/2018	0.3	Stan Eichner	Reading and responding to emails from Boston and co-counsel: TF, LD and TM, several each
78669	Hours Worked	10/11/2018	0.3	Stan Eichner	Series of emails about upcoming meeting and conference call with Boston and co-counsel
79480	Hours Worked	10/18/2018	0.6	Stan Eichner	Conference call with City of Boston [LD, TF, TM & me)
80392	Hours Worked	10/29/2018	1.6	Stan Eichner	Conference call with co-counsel and clients re this week's meeting; series of emails re scheduling and other preparation issues
81320	Hours Worked	11/8/2018	1.8	Stan Eichner	Reviewing materials for afternoon conference call and related emails in preparation
81409	Hours Worked	11/8/2018	0.6	Stan Eichner	Further preparation for call and the call itself
83686	Hours Worked	12/6/2018	0.6	Stan Eichner	Reviewing materials to prepare for meeting and conferring with TM
83752	Hours Worked	12/6/2018	3.8	Stan Eichner	Meeting with representatives from City of Boston 10-30 - 2; and meeting with MM afterwards .3

ID	Type	Date	Elapsed Time	User	Description
87347	Hours Worked	1/22/2019	0.4	Stan Eichner	Emails to and from Tom and Tim and follow up
90539	Hours Worked	2/27/2019	2.2	Stan Eichner	Review of packet of materials received from Boston in preparation for internal advocacy team meeting and meeting with the City
90964	Hours Worked	3/4/2019	0.7	Stan Eichner	Conference call with co-counsel to prepare for meeting on Tuesday
91082	Hours Worked	3/5/2019	2.4	Stan Eichner	Prepare for meeting with Boston and attending meeting at City Hall
93834	Hours Worked	4/1/2019	0.3	Stan Eichner	Emails to and from Tom and rest of team about Tuesday meetings
93868	Hours Worked	4/1/2019	1.4	Stan Eichner	Review emails about Boston's response and our strategy with client, MM, w/ LD and TF, and related emails to MS re effect on scheduling, etc.
94114	Hours Worked	4/2/2019	3.1	Stan Eichner	Meeting w/ Linda D. re case; conference call w/ co-counsel before meeting with Boston, meeting with City of Boston staff, conferring with LD afterwards
	SE total		26.7		
17808	Hours Worked	3/3/2017	0.4	Tom Murphy	Emails with DLC Executive Director re case, assignments for law students; research and list of projects
18029	Hours Worked	3/6/2017	0.4	Tom Murphy	Legal research: Taunton case; related emails
18435	Hours Worked	3/8/2017	0.3	Tom Murphy	Review photos of non-compliant ramps, intersections
18573	Hours Worked	3/9/2017	2	Tom Murphy	ADAAG, UFAS research; review intern's research; prepare attend and team conference call; notes
18605	Hours Worked	3/9/2017	0.3	Tom Murphy	Review Boston pedestrian ramp study; related emails
18966	Hours Worked	3/13/2017	1	Tom Murphy	Legal research - Statute of Limitations
21537	Hours Worked	3/31/2017	0.4	Tom Murphy	Legal research - USDC MA Title III case, Marradi - standing, readily achievable elements
22090	Hours Worked	4/3/2017	0.2	Tom Murphy	Review letter from City; related emails with team
28719	Hours Worked	5/31/2017	0.2	Tom Murphy	Review Beacon Hill sidewalk lawsuit article; related emails with team re case impact
33889	Hours Worked	7/18/2017	0.3	Tom Murphy	Review Seattle settlement agreement
34285	Hours Worked	7/21/2017	0.2	Tom Murphy	Emails with TF re data

<b>ID</b>	<b>Type</b>	<b>Date</b>	<b>Elapsed Time</b>	<b>User</b>	<b>Description</b>
34952	Hours Worked	7/26/2017	1.4	Tom Murphy	Review documents and other data in preparation for team conference call
35001	Hours Worked	7/27/2017	0.9	Tom Murphy	Legal team conference call - preliminary review of data, distribution of tasks
35038	Hours Worked	7/27/2017	0.2	Tom Murphy	Follow up emails re data and next conference call
35353	Hours Worked	7/31/2017	1	Tom Murphy	Initial review of complaints to City; categorize
35424	Hours Worked	7/31/2017	0.4	Tom Murphy	Review documents and data; prepare for team conference call
35426	Hours Worked	7/31/2017	0.8	Tom Murphy	Conference call with TF, Scott; Katie re database and plan for coding of violations
35895	Hours Worked	8/3/2017	0.4	Tom Murphy	Review CREEC memo re coding project
36006	Hours Worked	8/3/2017	2	Tom Murphy	Mapping and coding intersections and violations
36660	Hours Worked	8/9/2017	0.3	Tom Murphy	Emails with Tim and Scott re coding project
37678	Hours Worked	8/17/2017	0.5	Tom Murphy	Review mapping data
40731	Hours Worked	9/19/2017	0.4	Tom Murphy	Emails with TF and Scott re data
45709	Hours Worked	11/6/2017	0.3	Tom Murphy	Emails and review accessibility survey
49172	Hours Worked	12/14/2017	1	Tom Murphy	Review coding data
53575	Hours Worked	1/31/2018	0.3	Tom Murphy	Review documents; prepare for team conference call
53711	Hours Worked	2/1/2018	0.8	Tom Murphy	Conference call re update and strategy; research; email to team and follow-up emails
53975	Hours Worked	2/2/2018	0.4	Tom Murphy	Research and review Boston budget documents
55106	Hours Worked	2/13/2018	0.5	Tom Murphy	Review data sent by TF
55270	Hours Worked	2/14/2018	0.5	Tom Murphy	Review law student legal memo; review Boston workplans; email re same
55399	Hours Worked	2/15/2018	0.2	Tom Murphy	Telephone call with SE re case status, workplan
55426	Hours Worked	2/16/2018	0.6	Tom Murphy	Emails with TF re photos of violations, client retainer; emails w/ RG re photos; review data
56470	Hours Worked	2/28/2018	0.5	Tom Murphy	Review/comment draft Demand letter
56711	Hours Worked	3/2/2018	1.2	Tom Murphy	Legal research; Boston public documents research; edits to draft Demand letter
56855	Hours Worked	3/5/2018	0.4	Tom Murphy	Emails and telephone calls re plaintiffs
56955	Hours Worked	3/5/2018	0.3	Tom Murphy	Emails with TF re draft Demand letter
57075	Hours Worked	3/6/2018	0.7	Tom Murphy	Review latest draft Demand letter; comments, emails with team re same; MA AAB research
57122	Hours Worked	3/7/2018	0.3	Tom Murphy	Draft DLC description section

<b>ID</b>	<b>Type</b>	<b>Date</b>	<b>Elapsed Time</b>	<b>User</b>	<b>Description</b>
57547	Hours Worked	3/9/2018	0.5	Tom Murphy	Follow-up with potential Plaintiffs; review latest draft of demand letter
57883	Hours Worked	3/14/2018	0.3	Tom Murphy	Finalize DLC description section for demand letter
57985	Hours Worked	3/15/2018	0.6	Tom Murphy	Review Demand letter; telephone call with Tim F. and SE re same; review Seattle demand letter
58075	Hours Worked	3/15/2018	1.1	Tom Murphy	Plaintiffs: telephone call with Elaine H; telephone call with Michael M.; google maps research
58417	Hours Worked	3/19/2018	0.4	Tom Murphy	Team emails re status; review documents, demand letter
58634	Hours Worked	3/21/2018	0.3	Tom Murphy	Team emails; review Google Maps
58823	Hours Worked	3/23/2018	0.2	Tom Murphy	Emails with Elaine H. re her experiences
58917	Hours Worked	3/23/2018	0.3	Tom Murphy	Emails with TF re ramp photos, workplan; review documents
58969	Hours Worked	3/23/2018	0.4	Tom Murphy	Michael M. description of experiences and emails
59122	Hours Worked	3/26/2018	0.4	Tom Murphy	Plaintiffs - emails with M.M.; emails with Bill H.; telephone call SE re status
59838	Hours Worked	3/30/2018	0.3	Tom Murphy	Emails, drafting re plaintiffs statements
60475	Hours Worked	4/5/2018	0.2	Tom Murphy	Emails to plaintiffs re updates, status
60877	Hours Worked	4/11/2018	1	Tom Murphy	Plaintiffs: emails with C. Evans, M. Muehe; telephone call with Crystal Evans; telephone call with Elaine Hamilton; finalize Elaine H. vignette
61043	Hours Worked	4/12/2018	0.6	Tom Murphy	Telephone call with SE re status; telephone call with Colleen F.; draft claimant vignettes
61161	Hours Worked	4/13/2018	0.7	Tom Murphy	Emails with Michael, Crystal, Colleen re status of vignettes; edit vignettes; team emails re same
62413	Hours Worked	4/26/2018	0.4	Tom Murphy	Complete claimant vignettes; email TF and SE
62624	Hours Worked	4/27/2018	0.3	Tom Murphy	Emails with TF re plaintiffs, retainers
63285	Hours Worked	5/3/2018	0.4	Tom Murphy	Phone call with TF re final plaintiff statements; review final draft demand letter
63547	Hours Worked	5/7/2018	0.2	Tom Murphy	Phone call with TF re demand letter
63567	Hours Worked	5/7/2018	0.2	Tom Murphy	Review, file final demand letter which was sent today with exhibits
63839	Hours Worked	5/7/2018	0.3	Tom Murphy	Emails with clients re retainer agreements
64315	Hours Worked	5/11/2018	0.4	Tom Murphy	Emails with claimants re retainer and demand letter

ID	Type	Date	Elapsed Time	User	Description
64522	Hours Worked	5/15/2018	1.4	Tom Murphy	Attend Project Sidewalk webinar; related research
64699	Hours Worked	5/16/2018	0.2	Tom Murphy	Emails with Elaine Hamilton re status
65406	Hours Worked	5/23/2018	0.2	Tom Murphy	Team emails re Boston response to demand letter
65426	Hours Worked	5/23/2018	0.4	Tom Murphy	Review CP email and materials from Boston forum
66988	Hours Worked	6/6/2018	0.2	Tom Murphy	Emails with Elaine Hamilton re sidewalks, experiences
68714	Hours Worked	6/21/2018	0.2	Tom Murphy	Review correspondence from Boston
70135	Hours Worked	7/9/2018	0.5	Tom Murphy	Prepare and telephone call with co-counsel to discuss call with City attorney
70136	Hours Worked	7/9/2018	0.6	Tom Murphy	Conference call with co-counsel and City attorney
70241	Hours Worked	7/10/2018	0.3	Tom Murphy	Telephone call with Colleen F. re retainer; email Michael M. re same
70557	Hours Worked	7/12/2018	0.1	Tom Murphy	Follow up email to Michael re status
70757	Hours Worked	7/16/2018	0.8	Tom Murphy	Review documents from the City; emails with team re same
70981	Hours Worked	7/18/2018	0.2	Tom Murphy	Emails with Michael re status
74136	Hours Worked	8/20/2018	0.4	Tom Murphy	Review prior correspondence and emails; emails with team re follow up to City
74595	Hours Worked	8/22/2018	0.3	Tom Murphy	Email team with Plaintiff updates
75861	Hours Worked	9/7/2018	0.2	Tom Murphy	Telephone call with Colleen F re retainer, update
76040	Hours Worked	9/11/2018	0.5	Tom Murphy	Research Seattle, LA, Denver settlements
77049	Hours Worked	9/24/2018	0.3	Tom Murphy	Review Boston emails and team emails
77730	Hours Worked	10/1/2018	0.5	Tom Murphy	Team emails re scheduling; review draft agenda; calls to clients re status, meeting
78047	Hours Worked	10/3/2018	0.3	Tom Murphy	Emails with clients re meeting with City
78886	Hours Worked	10/12/2018	0.4	Tom Murphy	Team emails re meeting with Boston; emails to clients re same
79001	Hours Worked	10/15/2018	0.3	Tom Murphy	Emails with clients re meeting, conference call
79064	Hours Worked	10/16/2018	1	Tom Murphy	Research re Age Friendly Boston
79482	Hours Worked	10/18/2018	1	Tom Murphy	Review documents; prepare; conference call with City and team (TF, LD, SE); follow up team -mails and email to clients
79625	Hours Worked	10/19/2018	0.2	Tom Murphy	Review/comment draft email to City attorneys
80141	Hours Worked	10/24/2018	0.4	Tom Murphy	Emails with clients re preparation for telephone call and meeting with City
80423	Hours Worked	10/29/2018	1	Tom Murphy	Conference call with co-counsel and clients to prepare for 10/31 meeting with City



<b>ID</b>	<b>Type</b>	<b>Date</b>	<b>Elapsed Time</b>	<b>User</b>	<b>Description</b>
80424	Hours Worked	10/29/2018	0.4	Tom Murphy	Telephone call with City attorney re meeting location; team emails and telephone call with TF re rescheduling; emails with clients
80608	Hours Worked	10/30/2018	0.5	Tom Murphy	Phone call with clients re rescheduling; review documents from City
80618	Hours Worked	10/31/2018	0.7	Tom Murphy	Conference call with City attorneys
81357	Hours Worked	11/8/2018	1	Tom Murphy	Review documents from the City in preparation for conference call with City attorneys; emails with team in preparation for conference call
81358	Hours Worked	11/8/2018	0.2	Tom Murphy	Emails with clients re 12/6 meeting
81410	Hours Worked	11/8/2018	0.4	Tom Murphy	Conference call preparation and conference call with City attorneys
81508	Hours Worked	11/9/2018	0.2	Tom Murphy	Emails with Elaine H. re status
81816	Hours Worked	11/14/2018	0.2	Tom Murphy	Telephone call with Elaine H. re status
82617	Hours Worked	11/26/2018	0.3	Tom Murphy	Review listserv information re D.C. snow removal plans
83207	Hours Worked	11/30/2018	0.3	Tom Murphy	Review documents from the City
83492	Hours Worked	12/4/2018	0.8	Tom Murphy	Review documents and prepare for call; conference call with TF and LD; email SE and clients re update
83599	Hours Worked	12/5/2018	0.2	Tom Murphy	Reminder email to clients with demand letter
83627	Hours Worked	12/5/2018	2	Tom Murphy	Review documents and prepare for meeting with City
83654	Hours Worked	12/5/2018	0.2	Tom Murphy	Review annotated meeting agenda
83782	Hours Worked	12/6/2018	3.5	Tom Murphy	Meeting with City; negotiations
83783	Hours Worked	12/6/2018	4.7	Tom Murphy	Travel to/from Boston; and to/from City Hall
83871	Hours Worked	12/7/2018	1	Tom Murphy	Review notes from meeting; draft follow up questions; emails with team; ADA guideline and Access Board guideline research
83919	Hours Worked	12/10/2018	0.3	Tom Murphy	Emails with team re follow up questions; edit and send questions to City attorneys
86164	Hours Worked	1/8/2019	0.3	Tom Murphy	Team emails and email to Boston re information and meeting
86309	Hours Worked	1/9/2019	0.2	Tom Murphy	Team emails re exchange of information with City
86870	Hours Worked	1/16/2019	0.3	Tom Murphy	Review Walsh state of city address for information re PROW, infrastructure, etc.
87305	Hours Worked	1/22/2019	0.3	Tom Murphy	Emails with clients re rescheduled meeting

<b>ID</b>	<b>Type</b>	<b>Date</b>	<b>Elapsed Time</b>	<b>User</b>	<b>Description</b>
90899	Hours Worked	3/4/2019	1.3	Tom Murphy	Review email and documents from City in response to our questions; prepare for and participate in conference call with legal team (SE, TF, LD)
91077	Hours Worked	3/5/2019	2.8	Tom Murphy	Meeting with City - travel and preparation time
91078	Hours Worked	3/5/2019	2.2	Tom Murphy	Meeting with City attorneys and department representatives
91249	Hours Worked	3/7/2019	0.4	Tom Murphy	Review notes from meeting and draft follow up questions/requests; circulate to team
91397	Hours Worked	3/8/2019	0.3	Tom Murphy	Finalize, send list of follow up questions
91454	Hours Worked	3/8/2019	0.2	Tom Murphy	Emails with DLC Executive Director re status
92389	Hours Worked	3/18/2019	0.3	Tom Murphy	Emails with clients re meeting; telephone call with Michael M. re status
92853	Hours Worked	3/22/2019	0.4	Tom Murphy	Phone call w/ Michael M. re last meeting, our follow up questions; follow up emails
93347	Hours Worked	3/27/2019	0.3	Tom Murphy	Emails with team; emails with City re questions
93791	Hours Worked	4/1/2019	0.6	Tom Murphy	Email to City re questions/documents; emails with team re strategy; telephone call with Jason L.; additional emails with team, Michael M.
94012	Hours Worked	4/2/2019	0.7	Tom Murphy	Review documents from the City, prepare for conference call with SE, LD and TF re strategy for meeting
94067	Hours Worked	4/2/2019	1.6	Tom Murphy	Meeting with City (phone - me and TF; in person - SE, LD, Michael M.)
95664	Hours Worked	4/23/2019	0.3	Tom Murphy	Emails with LD and TF re status, strategy
95938	Hours Worked	4/24/2019	1	Tom Murphy	Review/edit draft term sheet; emails with team re same
96021	Hours Worked	4/25/2019	0.2	Tom Murphy	Email opposing counsel re our outstanding requests
96303	Hours Worked	4/30/2019	0.6	Tom Murphy	Review final term sheet; emails with team and clients re same; review email from opposing counsel re responses to questions
96513	Hours Worked	5/1/2019	1.2	Tom Murphy	Review email from opposing counsel and answers to questions; review PWD Construction Progress Report
96796	Hours Worked	5/2/2019	0.3	Tom Murphy	Emails with team re strategy
96999	Hours Worked	5/7/2019	0.3	Tom Murphy	Research and emails with team re Beacon Hill issues

ID	Type	Date	Elapsed Time	User	Description
97256	Hours Worked	5/8/2019	0.2	Tom Murphy	Emails with team re Monday conference call, confirming, strategy call
97312	Hours Worked	5/9/2019	1	Tom Murphy	Emails with opposing counsel re conference call planning; review data and DPW documents from the City
97547	Hours Worked	5/13/2019	1.7	Tom Murphy	Prepare for conference call with team; conference call with City re draft term sheet; follow up emails with team and with City to schedule next meeting
97649	Hours Worked	5/14/2019	0.4	Tom Murphy	Emails with clients re update on negotiations, questions, etc.
99476	Hours Worked	5/31/2019	0.2	Tom Murphy	Team emails re meeting with City
99626	Hours Worked	6/3/2019	0.4	Tom Murphy	Review City's response to draft term sheet; team emails re same
99842	Hours Worked	6/6/2019	0.6	Tom Murphy	Review documents and emails with team; planning call re today's meeting with the City
99843	Hours Worked	6/6/2019	0.7	Tom Murphy	Conference call with City to negotiate Term Sheet
99850	Hours Worked	6/6/2019	0.2	Tom Murphy	Update emails to plaintiffs, TP
100026	Hours Worked	6/7/2019	0.5	Tom Murphy	Review email from Jason L. re survey; emails with team re same
100122	Hours Worked	6/10/2019	0.2	Tom Murphy	Emails with Michael M. re status
100433	Hours Worked	6/13/2019	0.4	Tom Murphy	Emails with team re City's survey plan and tasks prior to next meeting; emails with Plaintiffs re update
101304	Hours Worked	6/21/2019	0.2	Tom Murphy	Emails with City re next week's meeting
101380	Hours Worked	6/24/2019	0.5	Tom Murphy	Team emails re meeting; review documents; emails with clients
101782	Hours Worked	6/27/2019	2.2	Tom Murphy	Review documents and prepare; conference call with the City re survey; follow up team emails; email M.M. re capital funds; research re c. 90 funds
102481	Hours Worked	7/3/2019	0.4	Tom Murphy	Emails with Michael M. re revenue sources; research; email team re same
102539	Hours Worked	7/5/2019	0.3	Tom Murphy	Research re potential City revenue sources
102647	Hours Worked	7/8/2019	0.2	Tom Murphy	Emails re next meeting with City
102834	Hours Worked	7/10/2019	1.3	Tom Murphy	Review documents; prepare; and conference call with the City; review and edit follow-up email to opposing counsel; emails with clients
103527	Hours Worked	7/17/2019	0.2	Tom Murphy	Legal research - Hamer 10th Cir. case
104661	Hours Worked	7/29/2019	0.3	Tom Murphy	Team emails - negotiation call preparation

ID	Type	Date	Elapsed Time	User	Description
104670	Hours Worked	7/29/2019	0.2	Tom Murphy	Negotiation conference call with City
104710	Hours Worked	7/29/2019	0.4	Tom Murphy	Review draft request for production; emails with team re same
104846	Hours Worked	7/30/2019	0.2	Tom Murphy	Transportation bond research
105473	Hours Worked	8/2/2019	0.3	Tom Murphy	Emails with team and review/edit draft request for production of documents
106022	Hours Worked	8/12/2019	0.5	Tom Murphy	Review/edit draft consent decree; email DLC Lit. Dir. re same; team emails re same
106568	Hours Worked	8/16/2019	0.8	Tom Murphy	Review prior survey materials and public record request documents; meeting preparation
106874	Hours Worked	8/21/2019	0.3	Tom Murphy	Planning emails re tomorrow's negotiation meeting
107009	Hours Worked	8/22/2019	1	Tom Murphy	Review documents, prepare; conference call with the City (Adam and Jason)
107032	Hours Worked	8/22/2019	0.4	Tom Murphy	Review agreements in prior cases and emails with team re which to send to Boston
107597	Hours Worked	8/28/2019	0.3	Tom Murphy	Emails with team and City re previous settlements
108079	Hours Worked	9/4/2019	0.4	Tom Murphy	Research - review New York settlement documents; emails with team re same
108328	Hours Worked	9/6/2019	0.2	Tom Murphy	Telephone call with clients, CE, EH re status
109290	Hours Worked	9/18/2019	0.2	Tom Murphy	Team emails re prompting Boston responses to draft Consent Decree
109919	Hours Worked	9/27/2019	0.2	Tom Murphy	Emails in preparation for next week's meeting
110327	Hours Worked	10/1/2019	1	Tom Murphy	Prepare and conference call with City; negotiations
110981	Hours Worked	10/8/2019	0.5	Tom Murphy	Team conference call re debrief from last call with City, prepare for next call
111366	Hours Worked	10/15/2019	0.3	Tom Murphy	Email from city re commitment on ramp numbers; team emails re same
111657	Hours Worked	10/17/2019	0.2	Tom Murphy	Team conference call to prepare for today's call with City
111665	Hours Worked	10/17/2019	0.8	Tom Murphy	Conference call with City - negotiations re draft Consent Decree and annual commitment
113699	Hours Worked	11/12/2019	0.2	Tom Murphy	Team emails re status; client emails re same
113798	Hours Worked	11/13/2019	0.3	Tom Murphy	Review documents and prepare for meeting with the City; Stantec research
113832	Hours Worked	11/13/2019	0.5	Tom Murphy	Negotiations - conference call with Jason and Adam

<b>ID</b>	<b>Type</b>	<b>Date</b>	<b>Elapsed Time</b>	<b>User</b>	<b>Description</b>
114346	Hours Worked	11/19/2019	0.4	Tom Murphy	Review Stantec proposal
114375	Hours Worked	11/19/2019	0.5	Tom Murphy	Team conference call to discuss Stantec proposal and outline response; review draft response
114412	Hours Worked	11/20/2019	0.3	Tom Murphy	Review documents and prepare for call with City
114418	Hours Worked	11/20/2019	0.7	Tom Murphy	Negotiations telephone call with City
114571	Hours Worked	11/22/2019	0.3	Tom Murphy	Emails re follow up issues with City and Stantec
115241	Hours Worked	12/3/2019	0.3	Tom Murphy	Team emails re meeting today; review documents and prepare for meeting
115261	Hours Worked	12/3/2019	0.4	Tom Murphy	Negotiations - conference call with City
115270	Hours Worked	12/4/2019	0.3	Tom Murphy	Emails with clients re status of negotiations
115676	Hours Worked	12/9/2019	0.3	Tom Murphy	Emails with clients; emails with team re conference call preparation
115886	Hours Worked	12/10/2019	0.3	Tom Murphy	Review documents and prepare for meeting
115890	Hours Worked	12/10/2019	0.6	Tom Murphy	Conference call with City
115892	Hours Worked	12/10/2019	0.3	Tom Murphy	Emails with co-counsel re fees; internal emails re DLC time and spreadsheet
116144	Hours Worked	12/11/2019	0.4	Tom Murphy	Review DPW responses to our questions re Stantec contract/mandates
116182	Hours Worked	12/12/2019	0.3	Tom Murphy	Review/edit fees spreadsheet for negotiations with City
116768	Hours Worked	12/18/2019	0.3	Tom Murphy	Conference call with City; negotiations
117823	Hours Worked	1/5/2020	0.3	Tom Murphy	Emails with team re previous negotiations call with City and plan for next call
118466	Hours Worked	1/10/2020	0.7	Tom Murphy	Conference call with team to prepare for today's call with the City to negotiate terms of proposed Consent Decree
118482	Hours Worked	1/10/2020	1.2	Tom Murphy	Prepare and conference call with City re proposed Consent Decree
118513	Hours Worked	1/10/2020	0.4	Tom Murphy	Review follow up data sent by City
119425	Hours Worked	1/21/2020	0.6	Tom Murphy	Review our edits to Consent Decree and emails with team re same; review additional documents to be sent to City and prepare for conference call
119651	Hours Worked	1/23/2020	1.2	Tom Murphy	Review documents and prepare; and Negotiations conference call with the City
121450	Hours Worked	2/10/2020	0.4	Tom Murphy	Prepare for team strategy call; team emails re postponement

ID	Type	Date	Elapsed Time	User	Description
121777	Hours Worked	2/13/2020	0.2	Tom Murphy	Emails re receiving documents from the City
122303	Hours Worked	2/20/2020	0.5	Tom Murphy	Team emails re next steps, client service awards; client emails re setting up phone meetings
122591	Hours Worked	2/24/2020	1	Tom Murphy	Emails and telephone calls with clients re negotiations status and service awards
122886	Hours Worked	2/26/2020	0.2	Tom Murphy	Emails with team re Plaintiffs input
123478	Hours Worked	3/3/2020	0.2	Tom Murphy	Team emails re status and LD conversation with Adam
123663	Hours Worked	3/5/2020	0.2	Tom Murphy	Provide update for DLC Lit. Dir.
123984	Hours Worked	3/10/2020	0.6	Tom Murphy	Review City's latest draft/edits to Consent Decree, team emails re same and meeting
124410	Hours Worked	3/16/2020	0.3	Tom Murphy	Prepare for team conference call
124411	Hours Worked	3/16/2020	0.9	Tom Murphy	Team conference call re City's latest draft Consent Decree, strategy
124878	Hours Worked	3/18/2020	0.6	Tom Murphy	Review transition plan and other documents from City
127592	Hours Worked	4/8/2020	0.5	Tom Murphy	Boston budget research
129859	Hours Worked	4/29/2020	0.4	Tom Murphy	Review/comment latest edits to draft Consent Decree; emails with team re strategy
130749	Hours Worked	5/4/2020	0.3	Tom Murphy	Team emails and email with opposing counsel
131080	Hours Worked	5/6/2020	0.3	Tom Murphy	Research re Boston latest construction order and guidance; emails with team re same
131532	Hours Worked	5/12/2020	0.2	Tom Murphy	Emails with City re meeting
132514	Hours Worked	5/19/2020	0.3	Tom Murphy	Emails with team; telephone call to City attorneys
133515	Hours Worked	5/29/2020	0.2	Tom Murphy	Telephone call to Adam C. and email to team
134061	Hours Worked	6/2/2020	0.2	Tom Murphy	Team emails re next steps
134224	Hours Worked	6/4/2020	0.2	Tom Murphy	Emails with City and team re next steps
134779	Hours Worked	6/9/2020	0.2	Tom Murphy	Telephone call with Michael M. re status of negotiations
136083	Hours Worked	6/19/2020	1	Tom Murphy	Prepare and telephone call with City re status; emails w DLC Lit. Dir.
136156	Hours Worked	6/19/2020	0.2	Tom Murphy	Review contract documents from City
136682	Hours Worked	6/24/2020	0.4	Tom Murphy	Boston FY 21 budget research; email team re same
136784	Hours Worked	6/25/2020	0.3	Tom Murphy	Review survey documents from City and prepare for meeting

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136822	Hours Worked	6/25/2020	1.6	Tom Murphy	Conference call with City re terms of Consent Decree; follow up emails with team re same
137630	Hours Worked	7/1/2020	0.4	Tom Murphy	Conference call with team re debrief from last call with City, edits to Consent Decree based on that call
138952	Hours Worked	7/14/2020	1.5	Tom Murphy	Conference call with City re terms of Consent Decree (1.1) and follow up call with team (.4)
139626	Hours Worked	7/20/2020	0.3	Tom Murphy	Emails with Michael M. re puddles/snow issue
139766	Hours Worked	7/21/2020	0.2	Tom Murphy	Email from Michael M. and emails with co-counsel re puddle issue
140068	Hours Worked	7/22/2020	0.2	Tom Murphy	Review City's edits to draft Consent Decree
140133	Hours Worked	7/23/2020	1.4	Tom Murphy	Negotiation conference call with City
141850	Hours Worked	8/5/2020	0.2	Tom Murphy	Review/comment Linda D. edits to draft Consent Decree
143490	Hours Worked	8/17/2020	0.2	Tom Murphy	Review City's response to latest draft
143766	Hours Worked	8/19/2020	0.7	Tom Murphy	Negotiations and status update DB notes, follow up emails; review documents from the City
147245	Hours Worked	9/17/2020	1.2	Tom Murphy	Prepare; negotiations with City; follow up emails with team
148129	Hours Worked	9/24/2020	0.2	Tom Murphy	Review email from Jason re private developers
148372	Hours Worked	9/25/2020	0.2	Tom Murphy	Team emails re including discussion of adding 2025 meet and confer to Consent Decree due to changed circumstances brought on by COVID
148443	Hours Worked	9/28/2020	0.6	Tom Murphy	Review email from Jason; conference call with City/negotiations
148726	Hours Worked	9/30/2020	0.2	Tom Murphy	Emails with team re revisions to Consent Decree
150758	Hours Worked	10/15/2020	0.6	Tom Murphy	Review City's revisions; call with City; follow-up team emails
151957	Hours Worked	10/23/2020	0.3	Tom Murphy	Review proposed edits to Consent Decree; emails with team re same
152063	Hours Worked	10/26/2020	0.5	Tom Murphy	Preparation and negotiations call with City
153535	Hours Worked	11/4/2020	0.2	Tom Murphy	Team emails re next steps
153713	Hours Worked	11/5/2020	0.5	Tom Murphy	Negotiations call with City; email to clients with update

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154205	Hours Worked	11/10/2020	0.6	Tom Murphy	Research re damages standard in 1st Cir.; emails with team re same; emails with clients
155053	Hours Worked	11/17/2020	0.5	Tom Murphy	Conference call with opposing counsel - negotiations/conversation re damages and fees
155060	Hours Worked	11/17/2020	0.4	Tom Murphy	Fees: retainer agreements review; hours calculations; email TP; co-counsel telephone call re same
156552	Hours Worked	12/1/2020	0.5	Tom Murphy	Negotiation call with City re damages, service awards; initial discussion of fees
157003	Hours Worked	12/3/2020	1	Tom Murphy	Timesheets review, categorize, prepare for fee demand
157070	Hours Worked	12/4/2020	0.5	Tom Murphy	Emails with team re fees
157280	Hours Worked	12/4/2020	0.4	Tom Murphy	Emails with Plaintiffs - update, damages
157304	Hours Worked	12/7/2020	0.2	Tom Murphy	Telephone call with Elaine Hamilton - update, damages
157892	Hours Worked	12/10/2020	0.3	Tom Murphy	Review draft complaint
158486	Hours Worked	12/15/2020	0.3	Tom Murphy	Team emails re fee demand contents
158780	Hours Worked	12/17/2020	0.2	Tom Murphy	Edits to fee demand letter
159504	Hours Worked	12/22/2020	0.4	Tom Murphy	Communications with clients re damages, Consent Decree status
161171	Hours Worked	1/8/2021	1	Tom Murphy	Conference call with City re attorneys' fees; follow-up emails with co-counsel re same and review records
161449	Hours Worked	1/12/2021	0.3	Tom Murphy	Emails with co-counsel re demand
161805	Hours Worked	1/13/2021	0.2	Tom Murphy	Telephone call with DLC Lit. Dir. re case update
162499	Hours Worked	1/19/2021	0.3	Tom Murphy	Review/edit follow-up fees letter
164323	Hours Worked	2/1/2021	0.2	Tom Murphy	Emails with City
164771	Hours Worked	2/2/2021	0.3	Tom Murphy	Emails re fees and revised agreement section re fees
167338	Hours Worked	2/22/2021	0.3	Tom Murphy	Globe article re new admin appointments; team emails re same and emails re meeting
167581	Hours Worked	2/23/2021	0.2	Tom Murphy	Emails with team re next steps and proposed fee language
169128	Hours Worked	3/3/2021	1	Tom Murphy	Negotiations call with City; emails with DLC Lit. Dir. re update, most recent version of Consent Decree
169847	Hours Worked	3/8/2021	0.2	Tom Murphy	Emails with co-counsel re updating complaint
169939	Hours Worked	3/9/2021	0.4	Tom Murphy	Emails with Michael M. re variances; review draft Consent Decree and discuss same with MM



ID	Type	Date	Elapsed Time	User	Description
171205	Hours Worked	3/16/2021	0.3	Tom Murphy	Email clients re Complaint updates
171407	Hours Worked	3/17/2021	0.6	Tom Murphy	Prepare and negotiations call with City
171522	Hours Worked	3/17/2021	0.3	Tom Murphy	Edits to draft complaint
171879	Hours Worked	3/19/2021	0.5	Tom Murphy	Conference call with co-counsel re counter proposal on monitoring fees
171923	Hours Worked	3/19/2021	0.2	Tom Murphy	Follow up emails to clients re status
172439	Hours Worked	3/24/2021	0.2	Tom Murphy	Team emails re monitoring fees
172643	Hours Worked	3/25/2021	0.1	Tom Murphy	Correspondence to City re monitoring
172974	Hours Worked	3/26/2021	0.3	Tom Murphy	Emails with clients re complaint updates
173087	Hours Worked	3/29/2021	0.8	Tom Murphy	Telephone call with City, negotiations
173094	Hours Worked	3/29/2021	0.2	Tom Murphy	Follow-up team emails and re-scheduling emails
173255	Hours Worked	3/30/2021	0.3	Tom Murphy	Review/comment edits to Consent Decree re dispute resolution, fees; team emails re same
173495	Hours Worked	3/31/2021	0.4	Tom Murphy	Team conference call to discuss proposed changes to dispute resolution section
173632	Hours Worked	4/1/2021	0.1	Tom Murphy	Communication to opposing counsel re dispute resolution
173636	Hours Worked	4/1/2021	0.4	Tom Murphy	Edits to Plaintiff experiences section of complaint; emails to clients re same
174578	Hours Worked	4/8/2021	0.6	Tom Murphy	Negotiations call with City
174579	Hours Worked	4/8/2021	0.4	Tom Murphy	Team conference call to discuss monitoring fees, other issues from negotiations call
174684	Hours Worked	4/9/2021	0.2	Tom Murphy	Review/edit draft email to City in response to issues raised in yesterday's negotiations
175014	Hours Worked	4/13/2021	0.4	Tom Murphy	Review email from Adam and their redlines to draft Consent Decree; emails with team and conference call to prepare for call with City today
175121	Hours Worked	4/13/2021	0.8	Tom Murphy	Negotiations call with City
175247	Hours Worked	4/14/2021	0.4	Tom Murphy	Email Crystal and Colleen re edits; incorporate Crystal edits into draft Complaint; review latest edits to draft Consent Decree and team email re same and re Notice
175325	Hours Worked	4/14/2021	0.3	Tom Murphy	Review Boston FY '22 budget; emails with team re relevant portions
176533	Hours Worked	4/26/2021	0.3	Tom Murphy	Review/comment Motion for Preliminary Approval
176770	Hours Worked	4/27/2021	0.4	Tom Murphy	Review final draft of Consent Decree; emails re meeting; review draft Class Notice

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176937	Hours Worked	4/28/2021	0.3	Tom Murphy	Work on notice publication list; team emails re same
177187	Hours Worked	4/29/2021	0.4	Tom Murphy	Team emails re remaining tasks, schedule; review Notice lists from prior cases and work on Boston Notice list
177383	Hours Worked	5/3/2021	0.2	Tom Murphy	Team emails re communication with City regarding list of violations; emails with Bill H. re advocacy organizations for Notice
177480	Hours Worked	5/3/2021	0.2	Tom Murphy	Team emails re today's call with City
177778	Hours Worked	5/4/2021	0.7	Tom Murphy	Team conference call re next steps, delineation of tasks; review final draft Consent Decree; email E. Hamilton re complaint update
177868	Hours Worked	5/5/2021	0.2	Tom Murphy	Update DB: Current status and schedule re pleadings
178204	Hours Worked	5/7/2021	0.2	Tom Murphy	Emails with Bill H re advocacy organizations for Notice
178943	Hours Worked	5/13/2021	1.3	Tom Murphy	Finalize list of Notice recipients; review drafts of Proposed Order and Final Judgment
179520	Hours Worked	5/18/2021	0.4	Tom Murphy	Telephone call with City re final Consent Decree, Notice, next steps
179641	Hours Worked	5/18/2021	0.3	Tom Murphy	Review/edit Preliminary Approval Motion; attorneys' fees research
179766	Hours Worked	5/19/2021	0.2	Tom Murphy	Team emails re Preliminary Approval motion
180313	Hours Worked	5/25/2021	0.4	Tom Murphy	Conference call with Boston re status of pleadings, next steps; follow up team emails re filing tasks
180424	Hours Worked	5/26/2021	0.3	Tom Murphy	Team emails re pleadings, filing; review USDC requirements; create sample PHV motion
180555	Hours Worked	5/26/2021	0.2	Tom Murphy	Review City's edits to pleadings; team emails re same
181142	Hours Worked	6/1/2021	0.2	Tom Murphy	Emails re Class Notice recipients
181451	Hours Worked	6/2/2021	0.4	Tom Murphy	Emails with clients re declarations
181574	Hours Worked	6/3/2021	0.8	Tom Murphy	Emails and telephone call with Elaine H.; review and edit Declaration by phone with Elaine H
181785	Hours Worked	6/7/2021	0.7	Tom Murphy	Revise plaintiff declarations; emails with team re same and filing timeframe; telephone call with Coleen F.

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182389	Hours Worked	6/10/2021	0.2	Tom Murphy	Review curb ramp request forms from Portland and Seattle; team emails re same
182468	Hours Worked	6/11/2021	0.5	Tom Murphy	Conference call with City re current status, next steps
182475	Hours Worked	6/11/2021	0.5	Tom Murphy	Follow up emails w Colleen F. re declaration; emails with team re filing logistics, attorney declarations
182650	Hours Worked	6/14/2021	0.3	Tom Murphy	finalize Colleen F. And Michael M. Declarations
182809	Hours Worked	6/15/2021	0.8	Tom Murphy	Team emails; review local rules; prepare for filing; complete local forms; review final Consent Decree
183224	Hours Worked	6/17/2021	0.5	Tom Murphy	Conference call with City re status of final approval of Consent Decree and pleadings
183226	Hours Worked	6/17/2021	0.3	Tom Murphy	Conference call and emails with co-counsel re status, filing, press release, client communications
183233	Hours Worked	6/17/2021	0.3	Tom Murphy	Telephone calls to clients re signatures, press
183665	Hours Worked	6/17/2021	0.3	Tom Murphy	Communications with clients; work on press release
184653	Hours Worked	6/30/2021	1.2	Tom Murphy	Prepare pleadings; ECF filing of Complaint and Pro Hac motions
184687	Hours Worked	6/30/2021	0.2	Tom Murphy	File TF pro hac vice
184897	Hours Worked	7/1/2021	0.2	Tom Murphy	Telephone call with Elaine H. re Consent Decree; emails with R. Wendell re same
184977	Hours Worked	7/1/2021	0.3	Tom Murphy	Waiver of service research; telephone call with clerk
185027	Hours Worked	7/1/2021	0.2	Tom Murphy	Team emails re press inquiry
185054	Hours Worked	7/1/2021	0.2	Tom Murphy	Complete waiver of service form, send to opposing counsel
185120	Hours Worked	7/1/2021	0.2	Tom Murphy	ECF filing - Waiver of service
185183	Hours Worked	7/2/2021	0.8	Tom Murphy	Misc communications with clients, team re filing status, press; emails re re-wording of Preliminary Approval motion
185549	Hours Worked	7/7/2021	0.3	Tom Murphy	Telephone call with clerk; emails re appearance, hearing date
186302	Hours Worked	7/13/2021	0.7	Tom Murphy	Emails re press release; emails with MM re press; telephone call with WBZ reporter
186550	Hours Worked	7/14/2021	0.2	Tom Murphy	Emails re notice tasks
186642	Hours Worked	7/15/2021	0.3	Tom Murphy	Telephone call with MM; email plaintiffs re fairness hearing

<b>ID</b>	<b>Type</b>	<b>Date</b>	<b>Elapsed Time</b>	<b>User</b>	<b>Description</b>
186970	Hours Worked	7/19/2021	1.2	Tom Murphy	Work on contact list for class notice
187355	Hours Worked	7/20/2021	0.3	Tom Murphy	Emails with MS, MM re class notice contacts
187671	Hours Worked	7/21/2021	0.4	Tom Murphy	Misc emails with co-counsel, Notice recipients, Ken S., Dan S.
188195	Hours Worked	7/27/2021	0.2	Tom Murphy	Emails re class notice, posting to website
188299	Hours Worked	7/29/2021	0.2	Tom Murphy	Emails re fee petition; emails w/ AG re timesheets, spreadsheet
189184	Hours Worked	8/5/2021	1	Tom Murphy	Review, edit time records spreadsheet
189249	Hours Worked	8/5/2021	1.2	Tom Murphy	Draft declaration in support of fee petition
189310	Hours Worked	8/5/2021	0.5	Tom Murphy	Review draft Plaintiff service award declarations and emails to Plaintiffs re same with instructions
189468	Hours Worked	8/6/2021	0.8	Tom Murphy	Finalize draft declaration re fees; email TP for approval
189485	Hours Worked	8/9/2021	0.4	Tom Murphy	Emails and telephone calls with Plaintiffs re service award petitions
189645	Hours Worked	8/10/2021	0.2	Tom Murphy	Finalize draft declaration based on TP edits; Email to co-counsel
189871	Hours Worked	8/11/2021	0.3	Tom Murphy	Telephone calls with two class members re their settlement questions; Emails with co-counsel to report back
190929	Hours Worked	8/18/2021	0.3	Tom Murphy	Telephone calls with plaintiffs to finalize service award declarations
191095	Hours Worked	8/18/2021	0.4	Tom Murphy	Finalize declarations of E.Hamilton, C.Evans, M.Muehe; e-mails with co-counsel re same
191185	Hours Worked	8/20/2021	0.3	Tom Murphy	Review and make comments re Plaintiff's motion for attorney's fees
191285	Hours Worked	8/25/2021	0.3	Tom Murphy	Telephone call with Colleen Flanagan and finalize service award declaration
	TM total		170.9		

# **EXHIBIT B**

**Exhibit B**

**Disability Law Center Expenses**

Complaint filing fee	6/30/21	\$ 402.00
Pro Hac Vice Motion fees		
Linda Dardarian	6/30/21	\$ 100.00
Raymond Wendell	6/30/21	\$ 100.00
Timothy Fox	6/30/21	\$ 100.00
<b>Total Expenses</b>		<b>\$ 702.00</b>