

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 12-61735-Civ-Zloch

BROWARD BULLDOG, INC., a Florida)
corporation not for profit, and DAN)
CHRISTENSEN, founder, operator and editor)
of the BrowardBulldog.com website,)
)
Plaintiffs,)
)
v.)
)
U.S. DEPARTMENT OF JUSTICE,)
950 Pennsylvania Avenue, NW)
Washington, DC 20530, and)
FEDERAL BUREAU OF INVESTIGATION,)
935 Pennsylvania Avenue, NW)
Washington, DC 20535,)
)
Defendants.)
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Declaration of Thomas R. Julin in Support
of Plaintiffs’ Motion for Interim Attorney’s Fees Award

Thomas R. Julin, pursuant to 28 U. S. C. § 1746, hereby declares under penalty of perjury as follows:

1. I am Thomas R. Julin, lead counsel for the plaintiffs, Broward Bulldog, Inc. and Dan Christensen, in this litigation and I have personal knowledge of the facts stated in this declaration.

Nature of the Action

2. This is an action filed pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, as amended by the OPEN Government Act of 2007, and the Declaratory Judgment

Act, 28 U.S.C. § 2201, for declaratory and injunctive relief, for attorneys' fees and expenses, and for other appropriate relief. It seeks the disclosure and release of agency records concerning persons who may have provided aid and assistance to the terrorists in the days and years leading to the attack.

3. The records are being sought to determine whether the FBI uncovered evidence that Saudi nationals living in Sarasota, Florida had close ties with high-ranking Saudi government officials, supported al-Qaeda, provided material aid and comfort to the terrorists who carried out the 9/11 attacks, and then left the United States abruptly just days before the 9/11 attacks took place. The records also are sought to determine whether the FBI, in order to protect the Saudi government or for other reasons, concealed or withheld such evidence from Congress, other U.S. government officials responsible for investigating the 9/11 attacks, the American public, and the news media.

Broward Bulldog, Inc. & Dan Christensen

4. Plaintiff Dan Christensen is an award-winning investigative reporter formerly affiliated with The Miami Herald and Daily Business Review. His stories about Broward Sheriff Ken Jenne's private business dealings sparked a federal corruption investigation that landed Jenne in prison in 2007. His stories about hidden and falsified court records in Florida led to a pair of unanimous Florida Supreme Court decisions in 2007 and 2010 outlawing those practices. In 2000-2001, his reporting about a deadly gun-planting conspiracy and cover-up by Miami police resulted in the indictment of more than a dozen officers and significant governmental reform, including the establishment of Miami's long sought civilian review panel.

5. After being laid off by The Miami Herald in 2009, Christensen formed Broward Bulldog, Inc. as a not-for-profit corporation to operate a website dedicated to investigative news

reporting. Hunton & Williams LLP provided pro bono legal services to Christensen to form the corporation and to qualify it for tax exempt status under 26 U.S.C. § 501(c)(3), because Christensen could not afford to pay legal fees for that work. Thereafter, Hunton & Williams LLP has continued to provide pro bono legal services to Broward Bulldog, Inc. to support its investigative news reporting service. The corporation relies on small donations from individuals in south Florida who believe in the value of investigative news services to support its existence. In 2014, Broward Bulldog, Inc. reported to the Internal Revenue Service total revenue of \$91,661 and expenses of \$75,994, which included a salary of \$40,833 paid to Mr. Christensen.

6. Reporting done by Broward Bulldog, Inc. is not for the personal benefit of Dan Christensen or any other persons or entities affiliated with them or financially supporting them. The reporting that is done is also not ideologically based or done in support of or in opposition to any political candidates or committees. All reporting done by Broward Bulldog, Inc., through its Florida Bulldog website, is about matters regarded by its editors and reporters as matters of public concern. As explained on the website: “We keep watchdog journalism alive by paying attention to and publishing important stories that otherwise go uncovered because of shifting priorities and lack of resources in the region’s conventional media outlets. We believe journalism is a public service that is essential to a free and democratic society. We are committed to bridging the gap by delivering more of the original, local, issue-oriented news and information our community needs.”

The FBI Investigation in Sarasota

7. Plaintiffs learned in 2011 from multiple witnesses of the existence of an FBI investigation of the departure of a Saudi family from Sarasota, Florida shortly before September 11, 2001, under unusual circumstances and that a variety of witnesses claimed that the family

had significant connections to individuals who had participated in the terrorist attacks on the United States. The plaintiffs first reported about this FBI investigation in an article published on the Broward Bulldog website on September 8, 2012. DE-1-4. The article noted that former U.S. Senator D. Robert Graham, who had co-chaired the Joint Inquiry, claimed that the FBI had never disclosed the existence of this investigation to Congress.

8. On September 9, 2011, the day after the Broward Bulldog reported about the investigation, the FBI publicly admitted that it had conducted the investigation, but also asserted that it had found no connection between the Saudi family and the terrorist attacks on the United States, and that it had disclosed the investigation to Congress.

9. Sen. Graham disputed the FBI's assertion that it had disclosed its investigation to Congress.

10. The conflict between the information provided by witnesses to the plaintiffs and Sen. Graham, and the public statements of the FBI, created the appearance that the FBI might be concealing a matter of great public importance, and this made it imperative for the plaintiffs to attempt to obtain access to any records that the FBI compiled in connection with its investigation.

The FOIA Request

11. By letter to the FBI dated September 26, 2011, plaintiffs submitted the Freedom of Information Act ("FOIA") request that is the subject of this litigation, and supplemented it with a further request on October 27, 2011. On December 22, 2011, the FBI granted Plaintiffs' request for expedited processing, citing 28 C.F.R. § 16.5(d)(1)(ii) and (iv). Section 16.5(d)(1)(ii) permits expedition when there is "[a]n urgency to inform the public about an actual or alleged federal government activity, if made by a person primarily engaged in disseminating

information,” and § 16.5(d)(1)(iv) permits expedition when there is “[a] matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence.”.

12. On February 7, 2012, the FBI denied Plaintiffs’ request, citing FOIA Exemptions 6 and 7C, 5 USC §§552(b)(6) & (b)(7)(C). On May 23, 2012, the Office of Information Policy of the U.S. Department of Justice denied Plaintiffs’ appeal of this decision, citing only FOIA Exemptions 7C, 5 USC §§552(b)(7)(C), and not Exemption 6. No records or information were produced.

The Terms of Engagement

13. Once the Department of Justice had denied the appeal, Mr. Christensen asked Hunton & Williams LLP to undertake the filing of a lawsuit challenging that decision in this Court. The firm agreed to do so without charging any fee to Broward Bulldog, Inc. or Mr. Christensen unless the Court determined that they were entitled to recover fees from the defendants pursuant to statute and did recover fees.

14. Since commencing work on this litigation in June, 2013, the firm has not been paid any fees for its work.

The Lawsuit is Filed

15. Plaintiffs commenced this action on September 5, 2012. DE-1.

16. Defendants moved to dismiss the complaint on November 19, 2012, asserting that the 25-page complaint was not a short and plain statement of the claim. DE-5. I filed a memorandum in opposition to the motion on December 3, 2012. DE-6.

17. While that motion was pending, I contacted Assistant United States Attorney Carole Fernandez regarding preparation of a proposed joint scheduling report and proposed

scheduling order pursuant to Rules 16 and 26 and thereafter met with her in person at the U.S. Attorney's Office on November 12, 2012. At that meeting, Ms. Fernandez informed me that the defendants had found no documents responsive to the FOIA request and that pursuit of the litigation would be fruitless. I advised her that I was surprised to hear that because Mr. Christensen had interviewed witnesses who were prepared to testify that they were aware of the existence of the FBI investigation. She indicated that irrespective of what witnesses might be claiming, the defendants simply had not located any responsive documents.

18. In light of Ms. Fernandez's contention, I realized that the plaintiffs would have to be able to prove that the defendants had not conducted a good faith search by showing that responsive documents must exist and could be found. I quickly began to prepare declarations for witnesses who previously had provided information that was the basis for the plaintiffs' news articles regarding the FBI investigation. This required multiple telephone interviews of the witnesses.

19. On January 4, 2013, I spoke with Sen. Graham concerning the defendants' contention that they had no documents responsive to the FOIA request. He advised me that the deputy director of the FBI, Sean Joyce, had shown him and he had read FBI documents responsive to the request.

20. The defendants filed their initial disclosures on January 9, 2013. The initial disclosures stated, as Ms. Fernandez previously had told me: "defendants have not located any records responsive to plaintiffs' request." DE-12 at ¶ B. Based on the information provided to me by Sen. Graham, I was aware that this information was false. Mr. Joyce himself had found records responsive to the request prior to the filing of the defendants' initial disclosures and had shown them to Sen. Graham.

21. On January 15, 2013, I spoke again with Ms. Fernandez and preparation of a proposed scheduling order. I told her at that time, that Sen. Graham had told me that the FBI had shown him documents responsive to the plaintiffs' FOIA request and I urged her to speak with her clients about acknowledging the existence of those responsive documents.

22. Ms. Fernandez and I completed a Joint Scheduling Report on the following day, January 16, 2013. DE-14 It reported that the plaintiffs wanted to conduct discovery through April 12, 2013, to determine whether the defendants made an adequate search, but that the defendants contended that no discovery should be allowed in this case. DE-14 ¶ IV.(b). The Court expeditiously entered a scheduling order on January 24, 2013, setting the case for a pretrial conference on July 12, 2013. DE-15.

The Defendants, When Confronted, Admit that Responsive Records Exist

23. Through March 7, 2013, I continued to work with witnesses on the preparation of declarations that would show that the defendants had found documents responsive to the FOIA request because I had heard nothing further from Ms. Fernandez. I also began preparation of a motion to compel the defendants to provide discovery regarding the adequacy of their search for responsive documents.

24. On March 8, 2013, I sent Ms. Fernandez an email which stated:

When we last spoke, you indicated that you would investigate further the possibility that documents responsive to the request could be located. I noted that the FBI office in Tampa had acknowledged the existence of the investigation and that witness interviews had been conducted in the course of the investigation, that neighbors of the al-Hijjis had interacted with the FBI during the investigation, and that Bob Graham had seen FBI documents regarding the investigation when he was looking into whether the FBI had turned over records of the investigation to the Joint Inquiry and the 9/11 Commission.

If you have been able to locate the documents, I would like your agreement to produce a Vaughn index to me and to the court and to submit the documents to the court for in camera review.

If you have been unable to locate the documents, I would like your agreement to produce for depositions David Hardy, Dave Couvertier, Steven E. Ibison, and Sean Joyce regarding how the search was conducted.

If you cannot agree to either request, I plan to file a motion to compel and would note in it your opposition.

Please let me know if we can reach agreement on any aspects of this or if instead the matter should be put before the court. I will be in my office throughout the day and available to discuss.

25. Ms. Fernandez responded later that same day, March 8, 2013, that there had been “some further developments,” and said she would provide additional information the following Monday, March 11, 2013. I agreed at that point to postpone the filing of a motion to compel discovery.

26. On March 11, 2013, Ms. Fernandez advised Patricia Acosta, an attorney at Hunton & Williams LLP working with me on this case, that the FBI in Tampa had located some responsive records which were being processed and that “supplemental response” to the plaintiffs’ FOIA request should go out within the next couple of weeks with regard to these records. She said the response would include any responsive records or portions of records which are not exempt from disclosure under FOIA and specify what exemptions were claimed as to any withholdings. She also indicated that the defendants would file a Vaughn index and a motion for summary judgment attached to or incorporated into a declaration.

27. Ms. Fernandez offered me no explanation of why the responsive documents had not been found a year and a half earlier when requested on September 26, 2011, or soon after the lawsuit had been filed on September 5, 2012,

28. By March 26, 2013, the plaintiffs had not received the supplemental response. So, I again emailed Ms. Fernandez, asking her whether additional documents were being produced. She responded that they would be sent by FedEx the following day.

The Initial 35 Pages Reveal “Many Connections” Had Been Found

29. On March 28, 2013, the plaintiffs received from the Department of Justice a supplemental response (DE 25-2 Ex. K) to their 2011 FOIA requests. The response indicated that the Department had located 35 pages of responsive documents, that 4 pages were being withheld entirely, and that 31 pages with certain information redacted were being produced. DE-29-4 ¶ 77.

30. The supplemental response relied for several of the redactions on FOIA exemptions not previously asserted, including the (b)(1) and (b)(3) exemptions for records classified as Secret by an Executive Order and documents required to be kept confidential by the National Security Act of 1947. DE-29-4 ¶ 77.

31. That response did not explain why the defendants had not previously located these documents or why the Department had not previously asserted exemptions that would apply only if disclosure of the records would be harmful to national security interests. DE-29-4 ¶ 78.

32. The response also provided no explanation of how disclosure of the documents conceivably could harm national security interests if, as the FBI publicly had asserted, the investigation of 4224 Escondito Circle had found no credible evidence of connections to the events of September 11, 2001. DE-29-4 ¶ 78.

33. The documents produced did not include many of the records that witnesses had told Christensen that the FBI had collected from witnesses during the investigation. DE-29-4 ¶ 79.

34. The documents produced did, however, include an FBI report which indicated that, contrary to the FBI’s public statements, it had found “many connections” between the Saudi family that left Sarasota prior to September 11, 2001, and persons associated with the terrorist

attacks on the United States. This document suggested to me that the FBI must have hundreds or thousands of pages of additional responsive documents which a good faith search would have located. Accordingly, I continued to finalize declarations of witnesses that could be used to attempt to compel the defendants to conduct a further search.

The Defendants Resist Producing Other Responsive, Non-Exempt Records

35. Mediation of this case had been scheduled for April 29, 2013, but the defendants filed a motion to be excused from mediation on April 1, 2013, DE-23. and the Court granted that motion. DE-24.

36. On May 13, 2013, the defendants moved for summary judgment, asserting that they had conducted a good faith search and that they had found no other responsive documents. DE-25. The assertion relied on hearsay and inadmissible evidence. DE-25-1.

37. In order to ascertain whether the defendants in fact conducted a good faith search for records responsive to my FOIA request, I propounded to the defendant on May 20, 2013, a set of interrogatories and a request for production of documents within the time allowed by the Court's pretrial order for such discovery. DE-29-4 Ex. 4. The defendants moved for a protective order, claiming they should not be required to respond to the discovery. DE-33.

38. I also asked Sen. Graham to review the documents that had been produced. Once he did, he signed a declaration on May 31, 2013, indicating that the documents "reflect that the FBI should have additional responsive documents to the plaintiffs' FOIA request." DE-29-5

¶47. He further testified:

By virtue of my service as co-chair of the Joint Inquiry and my many years of service in the United States Senate, I have become familiar with the nature of the documentation that the FBI creates in connection with investigations such as the Sarasota investigation described herein. An investigation of that type leads to the creation in the ordinary course of the operation of the FBI of numerous records showing the initial reports made to law enforcement agents, investigations

conducted relating to the initial reports, field investigations of the reports, statements taken by witnesses, documents collected from witnesses, and analyses of the raw data and information that it collected. In light of this pattern and practice of the FBI, it is entirely implausible that the FBI did not create or would not now be able to locate documents of this type that are responsive to the plaintiffs' Freedom of Information Act request in this case.

DE-29-5 ¶ 48.

39. Sen. Graham further testified that the FBI had shown him an additional responsive documents that had not been produced. DE-29-5 ¶50. He also explained: "On a matter of this magnitude and significance, my expectation is that the FBI would have hundreds or even thousands of pages of documents relating to the 4224 Escondito Circle investigation, and that those documents would be well indexed and easily retrievable to this day. As is apparent from the small number of documents released, this was not an investigation of run-of-the-mill criminal matters. It related to matters of paramount national importance." DE-29-5 ¶50.

40. I then filed an opposition to the defendants summary judgment motion, DE-28 & 29, a motion for a Vaughn Index, DE-27, and a motion to strike the hearsay that the defendants used to support their summary judgment motion, DE-26, on May 31, 2016. The opposition to the summary judgment was fully supported by the five witness declarations that I had prepared. DE-29-1-5.

41. The parties submitted a pretrial stipulation on June 26, 2013. DE-34.

42. On June 28, 2013, the Court denied the defendants' motion to dismiss the complaint. DE-38.

The Court Directs the Defendants to Conduct a Good Faith Search

43. At the pretrial conference on July 12, 2013, the Court heard argument regarding the pending motions and authorized the submission of a further motion by the plaintiffs that would propose a search methodology for the defendants to use. DE-45. Plaintiffs filed that

motion on July 19, 2013. DE-46. The defendants opposed the motion, again contending that they already had made a good faith search. DE-47. The Court granted the motion on March 31, 2014, and also denied the defendants' motion for summary judgment. DE-38.

44. In a 23-page order on April 4, 2014, the Court explained that it had ordered a more thorough search because the "Defendants' eagerness to assert exemptions and wooden method of interpreting Plaintiffs' FOIA requests essentially deprives the Court of its role in examining any relevant documents and independently determining whether any exemptions may apply." DE-60 at 7. The Court further held that "Defendants' characterization of Plaintiffs' second request is literal to the point of being nonsensical." DE-60 at 9. The Court found "apparent gaps between the documents" that had been produced that seemed "highly unusual," DE-60 at 11-12, and that "[]o reports of underlying inspections and investigations have been produced," DE-60 at 12. The Court expressed concern that "an investigation took place during this time period that apparently resulted in certain findings, yet, seemingly, the search yielded no documentation of this investigation." DE-60 at 12. The Court also found that the documents produced "seem to contradict one another" yet nothing that had been produced "reconciles this stark contradiction." DE-60 at 13=14.

45. The Court also found it significant that the defendants had found responsive documents only "after the lawsuit had been filed," DE-60 at 14 (emphasis in original), and pointed out that "Defendants do not explain to the Court's satisfaction why additional steps were undertaken or were suddenly reasonable to undertake merely because a lawsuit was filed." DE-60 at 15. The Court stated it was "troubled by the fact that the filing of the above-styled caused appeared to be cited by Defendants as a rationale or at least a prompt for performing further searches." DE-60 at 15. The Court criticized the defendants' claim of having conducted a good

faith search, noting that their declarant's affidavit was "conspicuously vague." DE-60 at 17.

46. In addition, the Court noted that documents shown to Sen. Graham and others promised to be shown to Sen. Graham had not been accounted for. DE-60 at 19.

47. In response to the Court's Order, the defendants moved for an enlargement of time to comply with the order and for reconsideration of the Order, disclosing for the first time that the Tampa Field Office of the FBI contained 23 boxes of records identified in a file identified by the universal case file number 265D-NY-280350-TP, the case number assigned by the FBI to its PENTTBOMB (Pentagon Twin Towers Bombing) Investigation. DE-61 at 1-2. The defendants also argued that they should not be required to search these materials for responsive records because the Plaintiffs had not made an adequate showing that "the public interest in disclosure is significant, and would not constitute a clearly unwarranted invasion of a third party's personal privacy." DE-61 at 4.

48. This assertion was surprising in light of the Plaintiffs' showing of the extraordinary public interest in understanding the circumstances leading to the 9/11 terrorist attacks and the law enforcement efforts that had been made both to prevent those attacks, prosecute those responsible for the attacks, and to stop future attacks. The Court denied reconsideration of its Order. DE-63.

49. Once the defendants commenced following the Court's instructions for more thorough search, the search began producing results.

The Court-Ordered Search Produces Results

50. On April 18, 2014, the defendants delivered to the Court twenty-seven (27) pages of classified material for in camera review. DE-66.

51. On May 1, 2014, defendants delivered to the Court four (4) boxes of classified

material and three (3) CD-ROMs, containing classified material for in camera review. DE-67.

52. On May 9, 2014, the defendants produced to the Plaintiffs four (4) of the twenty-seven (27) pages delivered to the Court on April 18, 2014. DE-68-1. The defendants also disclosed at this time that they had located in the Tampa Field Office of the FBI 80,266 pages of material consisting of 411 documents, all of which had been marked with the PENTTBOMB file number and classified as Secret. DE-68-1 ¶5. The existence of such a large volume of documents seemed to correspond to Sen. Graham's earlier assertion that once the FBI had found many connections between the Saudi family that left Sarasota and the terrorist attacks on the United States, that the FBI would have conducted an extensive investigation of the family and compiled thousands of pages of records in doing so.

53. On June 6, 2014, the defendants produced to the Plaintiffs thirty-one (31) additional pages of responsive documents not previously produced. DE-69-1.

54. On June 27, 2014, the defendants produced to the Plaintiffs an additional 12 pages of responsive documents, and delivered to the Court 17 pages of classified documents. DE-72-1.

55. On November 25, 2015, the defendants delivered to the Court four (4) boxes of classified material containing classified material for in camera review. DE-75.

56. In total, since the filing of this lawsuit, the defendants have located 83 pages of records which they concede are responsive to the Plaintiffs' FOIA requests, and they have produced significant portions of 79 of those pages because they did not even arguably fall within any exemption to disclosure requirements.

57. Significantly, as the Court already, has observed, the documents appear to contradict the public statements of the FBI which claim that the investigation they conducted of the Sarasota family found no connections to the terrorist attacks on the United States.

58. The Court's in camera review of classified documents remained pending at the time of the submission of this declaration. The Court also has not yet determined whether the defendants have properly redacted documents that have been produced or whether additional documents or documents have been withheld in violation of the Freedom of Information Act.

Relationship of this Case to the "28 Pages"

59. While the plaintiffs have been pursuing this litigation, they simultaneously have been seeking declassification of 28 pages of the report that Sen. Graham's Joint Inquiry Committee produced in 2002. DE-28-5 Ex. A at 415-43. Those pages contain "information suggesting specific sources of foreign support for some of the September 11 hijackers while they were in the United States." DE-28-5 Ex. A at 415.

60. The plaintiffs initially sought mandatory declassification review by the Federal Bureau of Investigation under procedures set forth in Executive Order 13,526 on June 10, 2013. After both the FBI and the Department of Justice failed to act on that request, the plaintiffs appealed the inaction to the Interagency Security Classification Appeals Panel in Washington, D.C. on July 10, 2014. That panel is empowered by Executive Order 13,526 to order declassification of these documents, subject to the President's power to overturn that decision. Hundreds of media reports in the last several weeks have stated that a decision from the President on this matter is expected in June, 2016.

61. Plaintiffs contend that the 28 Pages will help the American public to determine whether high-ranking members of the Saudi government provided support to terrorists who were in San Diego, California and then participated in the attacks on September 11, 2001. Plaintiffs further contend that the records that are sought in the instant lawsuit will help the American public to determine whether high-ranking members of the Saudi government also provided

support to terrorists who were in Florida and then participated in the attacks on September 11, 2001.

62. In essence, the 28 Pages are expected to reveal what the Joint Inquiry discovered about Saudi government support of terrorism and the Sarasota documents are expected to reveal what the Joint Inquiry failed to discover about Saudi government support for terrorism. Together, both sets of documents may reflect whether a Saudi government network throughout the United States was used to support the terrorist attacks on 9/11.

63. They also may help the American public to judge how the defendant law enforcement agencies reacted to the terrorist attacks on the United States and whether additional steps should have been taken to prevent the attacks and to prosecute those who may have aided the attacks.

64. Many members of Congress, family members of the victims of 9/11, and various current and former government officials, including both leading presidential candidates have now called for the release of the 28 Pages. Many different media reports are now also questioning why the FBI has classified the 80,000 pages of records that the FBI has produced to the Court in this case. *See, e.g.,* Shane Harris, *The FBI Is Keeping 80,000 Secret Files on the Saudis and 9/11*, Daily Beast (May 12, 2016); James Wilkinson, *FBI Has More Than 80,000 Secret Pages On 9/11 That Could Prove Hijackers Visited Florida Family With Links To Saudi Royal Family - But They May Never Be Released*, Daily Mail (May 12, 2016).

65. In reaction to some of these developments, the United States Senate passed on May 17, 2016, the Justice Against Supporters of Terrorism Act, which would remove some aspects of immunity for sovereign governments that support terrorist attacks on U.S. soil. S. 2040 (114th Cong. (2015-2016)). The U.S. House of Representatives is expected to consider the

bill shortly. I mention this because I believe it underscores the public importance of the records that are at the heart of this litigation.

Qualifications of the Lawyers

66. Thomas R. Julin. I received my J.D. with honors from the University of Florida Levin College of Law in 1981 and his B.A. with high honors from the University of Florida in 1981. I I have represented clients in multiple lawsuits to enforce state and federal open government laws and rules, including lawsuits that resulted in the following reported decisions regarding access to records and proceedings:

Sorrell v. IMS Health Inc.,
131 S. Ct. 2653 (2011)
(access to records of government-licensed pharmacies)

Brugmann v. State,
117 So. 3d 39 (Fla. 3d DCA 2013)
(access to judicial records)

News-Press v. U.S. Department of Homeland Security,
489 F.3d 1173 (11th Cir. 2007)
(access to records of Department of Homeland Security)

Campus Communications, Inc. v. Earnhardt,
821 So. 2d 388 (Fla. 5th DCA 2002)
(access to medical examiner records)

King v, State,
6 Fla. L.W. Supp. 490, (May 4, 1999)
(access to state attorney records)

Mobile Press-Register, Inc. v. Witt,
4 Fla. L. Weekly Supp. 159 (Fla. 17th Cir. 1996)
(access to police records)

United States v. Camacho,
22 Media L. Rep. (BNA) 1845 (S.D. Fla. 1994)
(access to judicial records)

State v. Rolling,
1994 WL 722891, 22 Media. L. Rep. (BNA) 2264 (Fla. 8th Cir. 1994)

(access to police investigative files)

United States v. Abegg,
21 Media L. Rep. (BNA) 1442 (S.D. Fla. 1993)
(access to judicial records)

Dore v. Sliger,
42 Fla. Supp. 2d 194 (2d Cir. 1990)
(access to state university faculty records)

Campus Communications, Inc. v. Criser,
13 Media L. Rep. 1398 (Fla. 8th Cir. 1986)
(access to university police department records)

United States v. Saunders,
11 Media L. Rep. 2247 (S.D. Fla. 1985)
(access to judicial records)

Bludworth v. Palm Beach Newspapers, Inc.,
476 So. 2d 775 (Fla. 4th DCA 1985)
(access to police investigative records)

United States v. Perez Casellas,
10 Media L. Rep. 2016 (S.D. Fla. 1984)
(access to judicial records)

United States v. Miller,
579 F. Supp. 862 (S.D. Fla. 1984)
(access to judicial records)

United States v. Lacayo,
572 F. Supp. 1222 (S.D. Fla. 1983)
(access to judicial records)

Wood v. Marston,
442 So. 2d 934 (Fla. 1983)
(access to meetings of state university search and screen committee)

67. I have received recognition for my work, including the following:

The Top 100 Florida Lawyers – Super Lawyers - 2015

The Top 100 Miami Lawyers – Super Lawyers - 2015

Best Lawyers – Florida First Amendment Lawyer of the Year - 2014

Best Lawyers – Florida Media Lawyer of the Year - 2014

Best Lawyers in America (First Amendment Practice Area) 1993-2015

Chambers USA Nationwide First Amendment Litigation Notable Practitioners 2009-15

Benchmark Litigation Local Litigation Star 2013-15

Martindale-Hubbell AV Preeminent

Most Effective Public Interest Lawyer Finalist 2013, Daily Business Review

Most Effective Pro Bono Lawyer Finalist 2009, Daily Business Review

Most Effective Public Interest Lawyer Finalist 2008, Daily Business Review

Most Effective First Amendment Lawyer of 2005, Daily Business Review

PEN USA Award of Honor 2007

South Florida Business Journal Key Partners – Legal - Litigation 2014

South Florida Business Journal Key Partners 2007-08, 2012

South Florida Legal Guide Top Attorneys List 2015

Florida Trend's Florida Legal Elite 2004-2015

Florida Super Lawyers 2006-2015

68. I have twice served as chair of the Florida Bar Media and Communications Law Committee.

69. Jamie Z. Isani. Ms. Isani graduated *magna cum laude* in May 2001 from the University of Michigan Law School, where she was a member of the Michigan Law Review. She received a B.A. in June 1998 from Kalamazoo College and Nagoya Gakuin University, Seto, Aichi, Japan. After law school graduation, she clerked for U.S. District Judge Joan A. Lenard for a two-year term. In October 2003, she joined Hunton & Williams LLP, where her practice has focused on constitutional challenges to legislation, nationwide class action litigation, and

state and federal court appeals. She is now a partner with the firm.

70. Patricia Acosta. Patricia Acosta received her juris doctorate degree with honors from the University of Miami School of Law in 2002. She joined Hunton & Williams as a summer associate in 2001 and as an associate upon her law school graduation in 2002. She served as a judicial law clerk for United States District Court Judge Donald L. Graham in the Southern District of Florida for a two-year term beginning in 2003. She returned to Hunton & Williams as an associate in September 2005. She founded her own law firm in 2015.

71. Paulo R. Lima. Paulo R. Lima received his law degree from Fordham University in 2005. Prior to obtaining his law degree, he had worked for eight years as a reporter for The Tampa Tribune and the Bergen Record. In 2012, Mr. Lima was selected by the Daily Business Review as a finalist for “Most Effective Lawyers” in the Corporate Securities Litigation category. He is now a partner with The Ferraro Law Firm.

72. Douglas C. Dreier. Douglas C. Dreier received his law degree from Duke University in 2013 where he was valedictorian and Executive Board Research Editor for Duke Law Journal. He then clerked for Judge Marjorie O. Rendell on the US Court of Appeals for the Third Circuit before joining Hunton & Williams LLP in 2015.

Fees Incurred by Broward Bulldog, Inc.

73. Attached as exhibits to this declaration are the following charts:

- Exhibit A Summary of the hours, fees, and rates of each timekeeper.
- Exhibit B Detailed narrative of the work done by each timekeeper, sorted by timekeeper.
- Exhibit C Detailed narrative of the work done by each timekeeper, sorted chronologically.

74. I prepared the attached Exhibits 1 through 3 from the billing records of Hunton & Williams LLP. The exhibits accurately reflect the contemporaneous time records kept by

Hunton & Williams LLP lawyers who worked on this case. Each Hunton & Williams LLP timekeeper records time through direct entry of time on a software application known as Carpe Diem. Firm policy requires input of time on a contemporaneous basis. Each time entry was reviewed by me for reasonableness and accuracy of the time devoted by each timekeeper to the various stages of litigation was reasonable, in my opinion, in light of the action's novelty and complexity and accurately represents work ordinarily performed by attorneys.

75. On the basis of my 35 years of experience practicing law, including my familiarity with rates charged by law firms for work of this type, it is my opinion that if fees are awarded in this case, the hourly rates that Hunton & Williams LLP set forth in Exhibit A through C would be reasonable in light of the unusual nature of the case, the difficulty of the case, the need to devote significant time to the matter immediately and to pull those resources away from other matters, and the requested rates are in line with those prevailing in south Florida for similar services by lawyers of reasonably comparable skill, experience, and reputation. In preparation of this declaration, I reviewed a survey of south Florida hourly rates conducted by the Daily Business Review. It reflected that the following attorneys' hourly rates in 2013 were as follows:

<u>Name</u>	<u>JD</u>	<u>Firm</u>	<u>Rate</u>
Mark Bloom	1979	Greenberg Traurig	\$850
Eliot Scherker	1975	Greenberg Traurig	\$725
Mitchell E. Herr	1981	Holland & Knight	\$695
Paul Singerman	1983	Berger Singerman	\$650
Patricia A. Redmond	1979	Stearns Weaver Miller Weissler Alhadeff & Sitterson	\$650
David Pollack	1983	Stearns Weaver Miller Weissler Alhadeff & Sitterson	\$650

76. I am familiar with each of the attorneys on this list. Each is a commercial litigation partner in a south Florida law firm and each has a similar degree of experience as I have, although none of them has the number of years of experience as Mr. Connor has or the

depth of experience in libel cases as I have.

77. I also reviewed the National Law Journal's 2013 Billing Survey. It reported that the hourly rate of Carlton Fields partners ranges from \$840 to \$455 per hour, of Akerman Senterfitt partners ranges from \$610 to \$350, and associates ranges from \$425 to \$175; of Weil Gotschal partners ranges from \$1075 to \$625, and associates ranges from \$790 to \$300; of Hogan Lovells partners ranges from \$1000 to \$705; and of White & Case partners ranges from \$1050 to \$700, and associates ranges from \$1050 to \$220.

78. I also reviewed a Daily Business Article published on October 5, 2015, by Mary Welch entitled *Lawyers Compensation: Billing Rates Remain Firm with Limited Increases*. It reported that court filings from September 2013 and August 2014 showed that hourly rates remained consistent and that "South Florida attorney hourly rates seem to be a solid group with a large percentage in the \$200-\$300 range, a second tier of \$450- to \$500-an-hour attorneys and a handful in the \$600 range."

79. On the basis of my 35 years of experience practicing law, it is my opinion that the time devoted to the prosecution of the claims against the U.S. Department of Justice and the Federal Bureau of Investigation was reasonable in light of the resistance that the defendants have put up and the extraordinary public importance of the records at issue.

80. In summary, this declaration shows that if the Court were to conclude that an interim attorneys' fees award should be made, the value of the time spent on this matter is \$409,919.25. Significantly, this amount does not include any multiplier to account for the right incurred in undertaking this matter without any assurance that the firm would be compensated for the work that it has done. My current hourly rate is \$840, Ms. Isani's current hourly rate is \$675. Mr. Dreier's current hourly rate is \$385. Ms. Acosta and Mr. Lima are no longer with

Hunton & Williams LLP. If the current hourly rates of those attorneys who have worked on this matter and who are still with the firm were used for all of the work that those attorneys did, the value of the time spent on this matter would be \$450,146.25

Declarant says nothing further.

Executed on May 23, 2016, at Miami, Florida.

s/Thomas R. Julin

Thomas R. Julin

Exhibit A to Declaration of Thomas R. Julin - Timekeeper Summary

Timekeeper	Narrative	Hours	Rate	Fees	Current Rate	Enhanced Fee
JULIN, THOMAS R	JD - 1981 - University of Florida	434.40	\$ 765.36	\$ 332,474.50	\$ 840.00	\$ 364,896.00
ISANI, JAMIE Z	JD - 2001 - University of Michigan	1.00	\$ 550.00	\$ 550.00	\$ 675.00	\$ 675.00
ACOSTA, PATRICIA	JD - 2002 - University of Miami	113.50	\$ 490.79	\$ 55,705.00	\$ 490.79	\$ 55,705.00
LIMA, PAULO R	JD - 2005 - Fordham University	25.30	\$ 514.92	\$ 13,027.50	\$ 514.92	\$ 13,027.50
DREIER, DOUGLAS C	JD - 2013 - Duke University	41.15	\$ 198.35	\$ 8,162.25	\$ 385.00	\$ 15,842.75
TOTALS		615.35	\$ 666.16	\$ 409,919.25	\$ 731.53	\$ 450,146.25

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
08/20/2012	ACOSTA, PATRICIA	Consideration of background facts concerning FOIA claims; review and edit draft complaint.	3.50	\$ 490.00	\$ 1,715.00
08/21/2012	ACOSTA, PATRICIA	Continue evaluation of background facts and law governing exemption 7 under FOIA.	3.50	\$ 490.00	\$ 1,715.00
08/22/2012	ACOSTA, PATRICIA	Conduct legal research and analysis of what constitutes private information under exemption 7 of FOIA.	4.50	\$ 490.00	\$ 2,205.00
08/28/2012	ACOSTA, PATRICIA	Incorporate D. Christiansen's proposed edits to the complaint and make additional edits; examine issue of whether FBI is an appropriate party.	2.50	\$ 490.00	\$ 1,225.00
08/29/2012	ACOSTA, PATRICIA	Continue evaluation of privacy interest issues asserted by the FBI under FOIA.	3.50	\$ 490.00	\$ 1,715.00
08/30/2012	ACOSTA, PATRICIA	Gather and review exhibits to the complaint and make additional edits to the complaint.	1.50	\$ 490.00	\$ 735.00
09/03/2012	ACOSTA, PATRICIA	Further evaluation of information provided by Dan Christensen regarding allegations in the complaint; conduct independent research to support allegations.	3.50	\$ 490.00	\$ 1,715.00
09/03/2012	ACOSTA, PATRICIA	Analysis of public information about extent of FBI investigation into the hijackers' contacts in the USA.	4.50	\$ 490.00	\$ 2,205.00
09/04/2012	ACOSTA, PATRICIA	Telephone conference with the client regarding allegations in the complaint; make final edits to the complaint before filing.	3.80	\$ 490.00	\$ 1,862.00
09/05/2012	ACOSTA, PATRICIA	Conduct legal research and analysis of cases interpreting what constitutes an unwarranted invasion of privacy under Exemption 7 of FOIA.	3.50	\$ 490.00	\$ 1,715.00
09/05/2012	ACOSTA, PATRICIA	Conduct legal research concerning public interest necessary to overcome privacy interest under exemption 7.	3.70	\$ 490.00	\$ 1,813.00
09/06/2012	ACOSTA, PATRICIA	Analysis of joint congressional report and 9/11 commission report concerning disclosure of facts about FBI investigations.	3.50	\$ 490.00	\$ 1,715.00
09/06/2012	ACOSTA, PATRICIA	Analysis of public information about extent of FBI investigation into the hijackers' contacts in the USA.	4.50	\$ 490.00	\$ 2,205.00
09/07/2012	ACOSTA, PATRICIA	Continue to conduct research concerning public interest necessary to overcome privacy interest under Exemption 7 of FOIA.	5.50	\$ 490.00	\$ 2,695.00
09/10/2012	ACOSTA, PATRICIA	Continue analysis of cases interpreting Exemption 7 of FOIA in preparation of draft summary judgment motion.	4.50	\$ 490.00	\$ 2,205.00
09/11/2012	ACOSTA, PATRICIA	Evaluate Bob Graham's affidavit and other pleadings filed in the new york litigation against the government of Saudi Arabia; continue analysis of potential evince and cases in preparation of summary judgment motion.	5.50	\$ 490.00	\$ 2,695.00
09/12/2012	ACOSTA, PATRICIA	Conduct legal research and analysis concerning: standard required to dispense with Vaughn index requirement; burden of proof under Exemption 7; reduction of privacy interests when facts regarding investigation are published ; extent of public interest in learning facts to prevent terrorists or genocide acts.	7.50	\$ 490.00	\$ 3,675.00
09/13/2012	ACOSTA, PATRICIA	Continue to research and analyze law and facts in preparation for motion for summary judgment.	7.50	\$ 490.00	\$ 3,675.00
09/24/2012	ACOSTA, PATRICIA	Continue preparation of summary judgment motion.	3.50	\$ 490.00	\$ 1,715.00
10/11/2012	ACOSTA, PATRICIA	Consideration of issues concerning deficient service of process; research appropriate service method; research appropriate agency to discuss service issue with; various conferences with local US attorneys offices re: same; coordinate re-service of complaint	3.70	\$ 490.00	\$ 1,813.00
11/19/2012	ACOSTA, PATRICIA	Review and consideration of motion to dismiss; evaluate cases addressed in the motion in preparation of response.	3.50	\$ 490.00	\$ 1,715.00
11/20/2012	ACOSTA, PATRICIA	Review and consideration of motion to dismiss; consideration of issues regarding responsive arguments.	1.00	\$ 490.00	\$ 490.00
11/28/2012	ACOSTA, PATRICIA	Work on preparation of response to motion to dismiss.	4.50	\$ 490.00	\$ 2,205.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
11/30/2012	ACOSTA, PATRICIA	Finalize preparation of insert to motion to dismiss; evaluate issues re: upcoming scheduling deadline and draft joint scheduling report.	2.50	\$ 490.00	\$ 1,225.00
12/18/2012	ACOSTA, PATRICIA	Evaluate issues concerning initial disclosures and prepare draft of disclosures; consider issues concerning desirability of motion to compel filing of joint scheduling report; correspond with C. Fernandez re; extension of time for filing joint scheduling report;	2.50	\$ 490.00	\$ 1,225.00
01/04/2013	ACOSTA, PATRICIA	Evaluate draft declarations and finalize draft of initial disclosures.	1.80	\$ 490.00	\$ 882.00
01/07/2013	ACOSTA, PATRICIA	Continue to work on the preparation of initial disclosures.	0.80	\$ 490.00	\$ 392.00
01/08/2013	ACOSTA, PATRICIA	Evaluate order of instructions entered by the court; consider issues regarding deadlines set in order and pending motions for extension of deadlines; confer with opposing counsel regarding scheduling of scheduling conference in accordance with order.	1.20	\$ 490.00	\$ 588.00
01/14/2013	ACOSTA, PATRICIA	Consideration of issues regarding case strategy and status of scheduling issues; evaluate and provide comments to draft declarations.	1.50	\$ 490.00	\$ 735.00
01/15/2013	ACOSTA, PATRICIA	Consideration of issues regarding schedule and strategy in light of government's contention that it has no documents; scheduling conference with Carol Fernandez	1.50	\$ 490.00	\$ 735.00
05/17/2013	ACOSTA, PATRICIA	Review and consideration of summary judgment motion and the supporting Hardy declaration.	1.20	\$ 500.00	\$ 600.00
05/24/2013	ACOSTA, PATRICIA	Review and comment on appeal of the decisions made by the FBI in connection with the March 29 letter and facilitate filing of the appeal; review and comment on request for interrogatories to the FBI.	2.00	\$ 500.00	\$ 1,000.00
05/31/2013	ACOSTA, PATRICIA	Evaluate draft of summary judgment motion and J. Scheinlin's opinion regarding sufficiency of search; prepare insert regarding failure of the Hardy declaration to provide search terms.	2.50	\$ 500.00	\$ 1,250.00
07/16/2013	ACOSTA, PATRICIA	Consideration of Hardy declaration and court order and prepare proposed search terms in accordance with the judge's ruling	2.50	\$ 500.00	\$ 1,250.00
12/02/2013	ACOSTA, PATRICIA	Evaluate notice of appearance of substitute counsel for the United States and case strategy.	0.80	\$ 500.00	\$ 400.00
	Subtotal		113.50	\$ 490.79	\$ 55,705.00
05/31/2012	DREIER, DOUGLAS C	Analysis of recent 11th Cir. and S.D. Fla. cases regarding FOIA's personal privacy exemption	2.25	\$ 195.00	\$ 438.75
05/31/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding 11th Cir. and S.D. Fla. case law	0.50	\$ 195.00	\$ 97.50
06/01/2012	DREIER, DOUGLAS C	Analysis of cases cited by the Department of Justice when rejecting to client's FOIA request	0.25	\$ 195.00	\$ 48.75
06/04/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding 11th Circuit and S.D. Fla. precedent on Exemption 7(C)	3.25	\$ 195.00	\$ 633.75
06/04/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding the need for the FBI to conduct a search of its records in the first place (Blackwell v. FBI)	0.50	\$ 195.00	\$ 97.50
06/05/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding client's options for litigating his FOIA request	3.50	\$ 195.00	\$ 682.50
06/05/2012	DREIER, DOUGLAS C	Revisions to legal memorandum regarding client's FOIA request	1.00	\$ 195.00	\$ 195.00
06/07/2012	DREIER, DOUGLAS C	Analysis of all federal case law regarding FOIA Exemption 7(C)	4.25	\$ 195.00	\$ 828.75
06/08/2012	DREIER, DOUGLAS C	Preparation of complaint to file against DOJ regarding client's FOIA request	5.00	\$ 195.00	\$ 975.00
06/11/2012	DREIER, DOUGLAS C	Revisions to FOIA complaint regarding Abdulaziz al-Hijji	0.75	\$ 195.00	\$ 146.25
06/15/2012	DREIER, DOUGLAS C	Analysis of case law to determine the evidentiary burden necessary to bring a FOIA claim	0.25	\$ 195.00	\$ 48.75

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
06/26/2012	DREIER, DOUGLAS C	Confer with T. Julin and D. Christensen regarding how to proceed with FOIA complaint	1.75	\$ 195.00	\$ 341.25
06/27/2012	DREIER, DOUGLAS C	Read potentially relevant parts of Anthony Summers' book, The Eleventh Day, to prepare for revisions to the FOIA complaint	1.50	\$ 195.00	\$ 292.50
06/28/2012	DREIER, DOUGLAS C	Revise FOIA complaint, conducting additional research as necessary	4.50	\$ 195.00	\$ 877.50
07/05/2012	DREIER, DOUGLAS C	Confer with Dan Christensen and Tom Julin regarding how to proceed with FOIA complaint	1.25	\$ 195.00	\$ 243.75
07/05/2012	DREIER, DOUGLAS C	Analysis of federal law to determine whether the FBI was required to disclose records to Congress	3.00	\$ 195.00	\$ 585.00
07/05/2012	DREIER, DOUGLAS C	Revisions to FOIA complaint	2.25	\$ 195.00	\$ 438.75
07/06/2012	DREIER, DOUGLAS C	Revisions to FOIA complaint; additional analysis of news articles and Sen. Graham's affidavit in In re Terrorist Attacks	4.00	\$ 195.00	\$ 780.00
09/23/2013	DREIER, DOUGLAS C	Meeting with Tom Julin to bring up to speed on developments in the case	0.40	\$ 265.00	\$ 106.00
09/23/2013	DREIER, DOUGLAS C	Analysis of court filings (motion for order compelling additional search and subsequent related filings) to bring up to speed on developments in the case	0.50	\$ 265.00	\$ 132.50
09/28/2015	DREIER, DOUGLAS C	Legal research into FOIA Exemption 6	0.50	\$ 345.00	\$ 172.50
	Subtotal		41.15	\$ 198.35	\$ 8,162.25
12/12/2012	ISANI, JAMIE Z	Confer with T. Julin regarding case strategy.	0.50	\$ 550.00	\$ 275.00
12/13/2012	ISANI, JAMIE Z	Analysis of evidentiary issues pertaining to admission of party e-mails.	0.50	\$ 550.00	\$ 275.00
	Subtotal		1.00	\$ 550.00	\$ 550.00
05/29/2012	JULIN, THOMAS R	Review of proposal for FOIA enforcement action against US Department of Justice regarding records relating to FBI investigation of Saudi nationals in Sarasota regarding possible involvement in 9/11 attack (3.0); drafting of complaint, cast of characters, and chronology (3.0).	6.00	\$ 750.00	\$ 4,500.00
05/30/2012	JULIN, THOMAS R	Continued drafting of complaint against Justice Department (2.5) and correspondence with Justice Department concerning conflict waiver (.25).	2.75	\$ 750.00	\$ 2,062.50
05/31/2012	JULIN, THOMAS R	Research concerning status of FOIA attorneys' fees statute (1.0); preparation of correspondence to client regarding conditions under which representation would be accepted (.5); preparation of research assignment for summer associate (.5).	2.00	\$ 750.00	\$ 1,500.00
06/04/2012	JULIN, THOMAS R	Drafting of engagement letter.	1.00	\$ 750.00	\$ 750.00
06/06/2012	JULIN, THOMAS R	Review of request for advice concerning removal of certain postings and preparation of response.	0.50	\$ 750.00	\$ 375.00
06/11/2012	JULIN, THOMAS R	Preliminary review of draft complaint to enforce the Freedom of Information Act.	1.50	\$ 750.00	\$ 1,125.00
06/15/2012	JULIN, THOMAS R	Further review of draft complaint and preparation of correspondence to client regarding modifications.	1.00	\$ 750.00	\$ 750.00
06/25/2012	JULIN, THOMAS R	Review of inquiry from Dan Christensen and preparation of response.	0.50	\$ 750.00	\$ 375.00
06/26/2012	JULIN, THOMAS R	Preparation for telephone call with Dan Christensen (1.0); telephone conference with Dan Christensen regarding possible FOIA action against Department of Justice (1.5).	2.50	\$ 750.00	\$ 1,875.00
06/28/2012	JULIN, THOMAS R	Review of Christensen correspondence to US Department of Justice.	0.50	\$ 750.00	\$ 375.00
07/01/2012	JULIN, THOMAS R	Preparation of revision to complaint and correspondence to client with recommendation for proceeding cautiously.	2.50	\$ 750.00	\$ 1,875.00
07/05/2012	JULIN, THOMAS R	Telephone conference with Dan Christensen regarding possible lawsuit against Justice Department (2.0); review of material provided by Doug Dreier from St. Petersburg Times article critical of Bulldog reporting (.5).	2.50	\$ 750.00	\$ 1,875.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
07/14/2012	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen responding to inquiry regarding status of case.	0.25	\$ 750.00	\$ 187.50
07/26/2012	JULIN, THOMAS R	Review of recent decision, National Day Laborer Organizing Network v. US Immigration and Customs Enforcement Agency and correspondence with Doug Dreier regarding same (1.5); telephone call from Norm Davis requesting information regarding opportunities to work for the Broward Bulldog (.75); preparation of correspondence to Dan Christensen regarding same (.25).	2.50	\$ 750.00	\$ 1,875.00
08/28/2012	JULIN, THOMAS R	Review of Dan Christensen comments on draft complaint and revision to implement suggestions by both Summers and Christensen.	3.50	\$ 750.00	\$ 2,625.00
08/29/2012	JULIN, THOMAS R	Completion of initial revisions to complaint on basis of Summers and Christensen comments (2.0); drafting of engagement letter for the matter (1.3); preparation of correspondence to Dan Christensen with complaint revisions addressing Anthony Summersrecommended changes and with engagement letter (.2); preparation of response to Christensen inquiry concerning response of Jamie Cole to public records request (.5).	4.00	\$ 750.00	\$ 3,000.00
09/02/2012	JULIN, THOMAS R	Editing of complaint to enforce the Freedom of Information Act.	3.50	\$ 750.00	\$ 2,625.00
09/04/2012	JULIN, THOMAS R	Review of Mingo v. US Department of Justice and other cases concerning proper defendant where FOIA request is directed to the FBI and further revision of complaint in preparation for filing on September 5 (3.6); review of whether defendants will be able to assert in litigation exemption not asserted as basis for affirming FBI denial of production of documents (.5); preparation of instructions for service of summons on FBI and Department of Justice (.2); transmittal of complaint for final reviewto client with instructions for review (.3).	4.60	\$ 750.00	\$ 3,450.00
09/05/2012	JULIN, THOMAS R	Review of client suggestion for changes to the complaint and exhibits (.2); conference with client regarding further revisions to the complaint (1.1); completion of changes to the complaint (3.2); memo to client confirming filing of complaint (.3); research concerning Freedom of Information act cases handles by Judge Zloch (.5); memo to client concerning assignment of case to Judge William Zloch (.3).	5.60	\$ 750.00	\$ 4,200.00
09/10/2012	JULIN, THOMAS R	Correspondence with Douglas Dreier regarding status of the case.	0.50	\$ 750.00	\$ 375.00
10/18/2012	JULIN, THOMAS R	Review of procedural problem with service on Department of Justice in Washington and preparation of memorandum to client regarding same.	1.00	\$ 750.00	\$ 750.00
11/15/2012	JULIN, THOMAS R	Telephone call from Carole Fernandez concerning her representation of the government in the case (.4); research regarding prior FOIA cases handled by Carole Fernandez and preparation of memo to file regarding same (3.4); preparation of correspondence to client regarding request from Fernandez for voluntary amendment of complaint to delete certain allegations (.5).	4.30	\$ 750.00	\$ 3,225.00
11/16/2012	JULIN, THOMAS R	Completion of correspondence to Dan Christensen concerning call from Carole Fernandez.	0.50	\$ 750.00	\$ 375.00
11/19/2012	JULIN, THOMAS R	Review of motion to dismiss the complaint and preparation of correspondence to client regarding proposed response.	0.50	\$ 750.00	\$ 375.00
11/20/2012	JULIN, THOMAS R	Review of request from client concerning motion to dismiss and preparation of response.	0.20	\$ 750.00	\$ 150.00
11/26/2012	JULIN, THOMAS R	Drafting of response to motion to dismiss.	4.00	\$ 750.00	\$ 3,000.00
11/29/2012	JULIN, THOMAS R	Continued drafting of memo in opposition to motion to dismiss.	2.50	\$ 750.00	\$ 1,875.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
11/30/2012	JULIN, THOMAS R	Completion of draft response to motion to dismiss the complaint (4.0); preparation of correspondence to client explaining memo, time for responses, and deadlines for pretrial compliance (.5); preparation of correspondence to Carole Fernandez requesting Rule 26 meeting to prepare scheduling conference report (.5).	5.00	\$ 750.00	\$ 3,750.00
12/01/2012	JULIN, THOMAS R	Further review and editing of response.	0.50	\$ 750.00	\$ 375.00
12/02/2012	JULIN, THOMAS R	Preparation of memorandum in opposition to motion to dismiss complaint.	4.50	\$ 750.00	\$ 3,375.00
12/03/2012	JULIN, THOMAS R	Further drafting of memorandum in opposition to motion to dismiss complaint (4.0); preparation of correspondence to client regarding status of the case (.3); correspondence with Carole Fernandez regarding meeting to prepare proposed scheduling report (.3).	4.60	\$ 750.00	\$ 3,450.00
12/10/2012	JULIN, THOMAS R	Review of motion to compel Vaughn index and all recent Eleventh Circuit cases and other cases considering Vaughn index issues.	3.50	\$ 750.00	\$ 2,625.00
12/11/2012	JULIN, THOMAS R	Completion of draft scheduling report and submission to Carole Fernandez for her review in advance of meeting.	2.50	\$ 750.00	\$ 1,875.00
12/12/2012	JULIN, THOMAS R	Final preparation for conference of counsel to prepare scheduling report (1.0); participation in conference (1.0); telephone conference with client regarding results of scheduling conference (.5); preparation of correspondence to client summarizing results of conference and recommending strategy for proceeding with the case (.7); request to client for email from Susan Martin concerning FBI statement (.3).	3.00	\$ 750.00	\$ 2,250.00
12/13/2012	JULIN, THOMAS R	Preparation of correspondence to client regarding communications with Tony Summers (.5); preparation of stipulation regarding service of the complaint and correspondence to Carole Fernandez requesting agreement to same (.6); preparation of analysis of National Archives & Records Administration decision from US Supreme Court and memo regarding same in order to prepare for argument that burden of proof is on plaintiff to show that documents are not exempt from disclosure requirements (1.5); preparation of memo regarding declarations needed for summary judgment motion (1.5); memo to client regarding declarations needed (.4); review of reply to response to motion to dismiss and preparation of correspondence to client regarding same (.7); review of email from Susan Martin containing FBI press release and research regarding evidentiary issues raised by email (1.3).	6.50	\$ 750.00	\$ 4,875.00
12/14/2012	JULIN, THOMAS R	Review of National Archives & Records Administration v. Favish in light of comments from opposing counsel concerning applicability of the case (.5); preparation of correspondence to client regarding Carole Fernandez remarks concerning inadequacy of speculation that records would reveal wrongdoing by the government (.4); review of correspondence from Dan Christensen regarding preparation of declarations of witnesses and preparation of response (.3); preparation of public records request to JulieKlahr for records relating to DCF contract (4.0).	5.20	\$ 750.00	\$ 3,900.00
12/17/2012	JULIN, THOMAS R	Close review of request for public records concerning Concordia contracts with third party vendors and preparation of questions to Dan Christensen regarding same.	3.00	\$ 750.00	\$ 2,250.00
12/18/2012	JULIN, THOMAS R	Conference with Patricia Acosta concerning preparation of motion to compel compliance with Rule 16.	1.50	\$ 750.00	\$ 1,125.00
01/01/2013	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen concerning status. of the case.	0.50	\$ 750.00	\$ 375.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
01/02/2013	JULIN, THOMAS R	Initial drafting of Declaration of Daniel Robert "Bob" Graham to establish existence of requested records. (3.5); retrieval and review of Joint Inquiry Report and 9/11 Commission report for use in connection with preparation of Graham declaration (2.3); conference with Dan Christensen regarding witnesses to contact for declarations (1.2).	7.00	\$ 750.00	\$ 5,250.00
01/03/2013	JULIN, THOMAS R	Further drafting of proposed declarations for witnesses.	2.20	\$ 750.00	\$ 1,650.00
01/04/2013	JULIN, THOMAS R	Review of FBI email (.3); conference with Bob Graham for purposes of revision of proposed declaration (1.1); revision of first draft of proposed declaration on basis of Graham comments (2.6); conference with Larry Berberich (.5); conference with Jone Weist (.7); preparation of correspondence to Jone Weist and to Dan Christensen regarding results of interviews (.5); conference with Christensen regarding Graham comments (.5); memo to Christensen concerning Larry Berberich comments (.3).	6.50	\$ 750.00	\$ 4,875.00
01/07/2013	JULIN, THOMAS R	Preparation of draft declaration for Larry Berberich (2.5); preparation of declaration of Jone Weist (2.1); preparation of correspondence to Dan Christensen regarding review and revision of proposed declarations (.3); revision of correspondence to Julie Klahr requesting public records concerning Broward Behavioral Health Coalition Inc. and Concordia Care, Inc. (1.3).	6.20	\$ 750.00	\$ 4,650.00
01/08/2013	JULIN, THOMAS R	Conference with Dan Christensen regarding declarations (.5); revision of Weist and Berberich declarations and preparation of correspondence to witnesses with declarations (1.5); revision of Graham declaration and preparation of correspondence to him regarding same (1.2); preparation of draft initial disclosure of witnesses and documents that may be used in support of claims (3.8).	7.00	\$ 750.00	\$ 5,250.00
01/10/2013	JULIN, THOMAS R	Research regarding executive orders governing disclosure of classified information (1.0); preparation for telephone conference with Bob Graham concerning his declaration (.7); telephone conference with Bob Graham concerning his declaration (1.3); telephone conference with Dan Christensen regarding conference with Graham (.4); preparation of proposed questions for Jim Wolfe for Bob Graham to ask concerning FBI records shown to Graham (1.2); preparation of correspondence to Christensen regarding draft questions to Wolfe (.2).	4.80	\$ 750.00	\$ 3,600.00
01/11/2013	JULIN, THOMAS R	Drafting of declaration for Jone Barlow Weist and research regarding Weist background for declaration (1.5); completion of draft questions for Jim Wolfe, security director of the U.S. Senate Intelligence Committee and preparation of correspondence to Bob Graham regarding same (1.5); review of Weist's requested revisions to her declaration and preparation of memo to Weist regarding same with requested revisions (1.2).	4.20	\$ 750.00	\$ 3,150.00
01/15/2013	JULIN, THOMAS R	Preparation for conference call (.4); telephone conference with Carole Fernandez regarding revision and submission of scheduling conference and proposed scheduling order as required by court order (.6); review and revision of scheduling conference report based on requested revisions from Fernandez (2.8); conference with Dan Christensen regarding requested revisions to scheduling report and preparation of further revisions based on Christensen scheduling issues (.4); completion of declaration revisions for Bob Graham declaration and preparation of correspondence to him regarding same (.4); telephone call from Bob Graham regarding his review of declaration and timing of declaration submission (.2); preparation of correspondence to Bob Graham concerning schedule of lawsuit and immediate issues (.3)	5.10	\$ 750.00	\$ 3,825.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
01/16/2013	JULIN, THOMAS R	Review of further proposals for revision to scheduling conference report from Carole Fernandez, implementation of proposed changes, preparation of correspondence to Fernandez confirming that changes have been made, review of agreement to same from Fernandez, and submission of report to the court.	0.70	\$ 750.00	\$ 525.00
01/18/2013	JULIN, THOMAS R	Telephone call to Larry Berberich regarding changes to be made in draft declaration (.5); revision of declaration in accordance with Berberich's requests (.5); preparation of correspondence to Berberich with revised declaration and requesting execution (.2); drafting of possible declaration for Patrick Gallagher after review of references to Gallagher in articles and other materials (1.4); search for information about Gallagher (.3); telephone call to Patrick Gallagher to discuss possible declaration (.5); revision of declaration (.8); preparation of correspondence to Gallagher with proposed declaration (.2); preparation of draft declaration for Louise Tessier (1.1); preparation of correspondence to Dan Christensen regarding progress with Berberich and Gallagher (.3).	5.60	\$ 750.00	\$ 4,200.00
01/21/2013	JULIN, THOMAS R	Memo to Dan Christensen regarding Hammoud documents and Gallagher and Berberich declarations.	1.20	\$ 750.00	\$ 900.00
01/24/2013	JULIN, THOMAS R	Review of orders entered by Judge Zloch referring case to mediation and setting trial instructions and preparation of correspondence to Dan Christensen regarding same.	1.00	\$ 750.00	\$ 750.00
02/04/2013	JULIN, THOMAS R	Telephone conference with Dan Christensen regarding status of the case.	0.30	\$ 750.00	\$ 225.00
02/05/2013	JULIN, THOMAS R	Conference with Dan Christensen concerning status of the case, including selection of mediator and time and place of mediation; preparation of correspondence to Carole Fernandez concerning selection of mediator.	0.60	\$ 750.00	\$ 450.00
02/06/2013	JULIN, THOMAS R	Review of correspondence from Dan Christensen (.2); and preparation of response regarding status of Bob Graham's declaration and mediation dates and correspondence (.2); preparation of further correspondence to Carole Fernandez regarding mediation (.2); preparation of instructions for Amy Vasilievich to prepare notice of selection of mediator (.2).	0.80	\$ 750.00	\$ 600.00
02/13/2013	JULIN, THOMAS R	Telephone call from Bob Graham regarding the status of his declaration and preparation of materials to send to Graham for further review (1.0); preparation of report to Dan Christensen regarding recent contact with Graham regarding declaration and inquiries to Jim Wolfe of the US Senate Intelligence Committee (.5).	1.50	\$ 750.00	\$ 1,125.00
03/04/2013	JULIN, THOMAS R	Initial drafting of motion for Vaughn index and other relief (3.7); preparation of list of pretrial deadlines for Dan Christensen(.2).	3.90	\$ 750.00	\$ 2,925.00
03/05/2013	JULIN, THOMAS R	Preparation of correspondence to Bob Graham regarding status of his declaration (.3); continued drafting of motion for Vaughn index and other relief compiling all factual assertions in declarations of al-Hijji neighbors and of Graham (4.3); preparation of declaration for Dan Christensen (2.0).	6.60	\$ 750.00	\$ 4,950.00
03/06/2013	JULIN, THOMAS R	Completion of motion for Vaughn index and other relief and proposed declaration for Dan Christensen in support of motion (4.3); telephone conference with Bob Graham regarding completion of his declaration (.3); preparation of correspondence to Christensen with case update and plan for filing of motion for Vaughn index and certain other relief (.3).	4.90	\$ 750.00	\$ 3,675.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
03/07/2013	JULIN, THOMAS R	Review of Bob Graham's proposed changes to his declaration (.3), revision of his declaration to make those changes and to add material for FBI email concerning the investigation (2.2), final proofing of declaration (.5). and preparation of correspondence to Bob Graham with revised declaration (.2).	3.20	\$ 750.00	\$ 2,400.00
03/08/2013	JULIN, THOMAS R	Final preparation of Graham declaration with exhibits (1.3); conferences and email exchanges with Dan Christensen and preparation of his final declaration with exhibits (2.6); preparation of correspondence to Carole Fernandez asking her for Vaughn index and submission of documents in camera or for position on motion to compel same (.4); preparation of correspondence to Dan Christensen regarding request to Fernandez (.2); review of response (.1);	4.60	\$ 750.00	\$ 3,450.00
03/26/2013	JULIN, THOMAS R	Preparation of correspondence to Carole Fernandez requesting information regarding status of supplemental response to FOIA request for documents.	0.50	\$ 750.00	\$ 375.00
03/28/2013	JULIN, THOMAS R	Review of supplemental response to FOIA request containing 35 documents, conference with Dan Christensen regarding same, and preparation of analysis of the documents for Christensen.	4.00	\$ 750.00	\$ 3,000.00
03/29/2013	JULIN, THOMAS R	Further review of newly-released documents and inclusion of substance of the documents in maser chronology of events and preparation of analysis of classification assertions for Christensen.	3.40	\$ 750.00	\$ 2,550.00
04/01/2013	JULIN, THOMAS R	Review of draft motion to exempt lawsuit from mediation drafted by Carole Fernandez (.2), correspondence to Dan Christensen regarding same (.3); and follow up correspondence to Carole Fernandez consenting to motion for exemption (.3).	0.80	\$ 770.00	\$ 616.00
04/05/2013	JULIN, THOMAS R	Review of FDLE records for Visio charting and archiving of Christensen emails (2.2); call from Dan Christensen (2.2); telephone conference with Dan Christensen (.5); preparation of correspondence to Dan Christensen regarding significance of the Hammoud records (.5); review of correspondence from Dan Christensen concerning Tony Summers comments (.2).	3.40	\$ 770.00	\$ 2,618.00
04/08/2013	JULIN, THOMAS R	Preparation of proposed correspondence to Carole Fernandez regarding possible existence of additional responsive records not produced and not claimed to be exempt pursuant to the Freedom of Information Act (1.5); further diagramming of relationships of primary parties in the case (1.0).	2.50	\$ 770.00	\$ 1,925.00
04/09/2013	JULIN, THOMAS R	Review of comments from Dan Christensen regarding records produced and preparation of response (.5); review of litigation deadlines and preparation of correspondence to Dan Christensen regarding deadlines (.5); preparation of analysis of FBI produced documents (1.3).	2.30	\$ 770.00	\$ 1,771.00
04/10/2013	JULIN, THOMAS R	Call from Bob Graham concerning FBI produced documents (.5); preparation of checklist for telephone conference with Carole Fernandez (.5); review of further analysis of FBI documents by Dan Christensen and preparation of response (1.2); preparation of memo to Christensen regarding schedule to be followed in the litigation (.8).	3.00	\$ 770.00	\$ 2,310.00
04/11/2013	JULIN, THOMAS R	Review of correspondence from Carole Fernandez regarding status of documents and preparation of response (.2); review of correspondence from Dan Christensen and preparation of response (.2); review of Christensen description of redactions in produced documents for proposed story (.3); review of further correspondence from Dan Christensen concerning question to be asked of Carole Fernandez concerning bank deposit slips (.5).	1.20	\$ 770.00	\$ 924.00
04/12/2013	JULIN, THOMAS R	Preparation of memo to John Delionado requesting assistance with expert witness regarding FBI practices and procedures.	0.50	\$ 770.00	\$ 385.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/18/2013	JULIN, THOMAS R	Call from Carole Fernandez regarding whether FBI has been able to locate additional records to produce, regarding 302s referenced in Sarasota 26-27, phone records, financial records, and Graham memo (.7); telephone call to Judge Zloch's chambers with Fernandez concerning mediation (.4); telephone call to Dan Christensen regarding conference with Fernandez and call to Zloch re mediation (1.2).	2.30	\$ 770.00	\$ 1,771.00
04/25/2013	JULIN, THOMAS R	Review of recent decision by Judge King in litigation in which US Navy asserted that it had conducted an adequate search for records.	1.00	\$ 770.00	\$ 770.00
05/13/2013	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen concerning status of the litigation (.5); receipt and preliminary review of government's motion for summary judgment asserting that it had conducted a good faith investigation and attempting to substantiate basis for assertion of exemptions (.6); preparation of correspondence to Christensen (.2)	1.30	\$ 770.00	\$ 1,001.00
05/15/2013	JULIN, THOMAS R	Review of materials provided by Dan Christensen concerning similar FOIA responses.	0.50	\$ 770.00	\$ 385.00
05/17/2013	JULIN, THOMAS R	Further review of summary judgment papers and preparation of memo to Dan Christensen regarding strategy for response.	0.50	\$ 770.00	\$ 385.00
05/19/2013	JULIN, THOMAS R	Preparation of draft interrogatories to Department of Justice.	1.00	\$ 770.00	\$ 770.00
05/20/2013	JULIN, THOMAS R	Review and revision of plaintiffs' first set of interrogatories (3.3); drafting of first request for production of documents (.5).	3.80	\$ 770.00	\$ 2,926.00
05/21/2013	JULIN, THOMAS R	Research regarding Freedom of Information Act appeals, including review of Rosenfeld v. US Department of Justice series of cases and initial drafting of appeal from decision reflected in March 28, 2013, document release (7.1); review of materials provided to Christensen from Mark Carmanica at Reporters' Committee for Freedom of the Press (.5).	7.60	\$ 770.00	\$ 5,852.00
05/23/2013	JULIN, THOMAS R	Analysis of classification of documents released 3-28-2013 and research regarding prior Hardy declaration cases.	3.50	\$ 770.00	\$ 2,695.00
05/24/2013	JULIN, THOMAS R	Completion of draft appeal from March 28, 2013 DOJ decision to release some documents but assert exemptions for other documents (4.0); review and revision of appeal letter (2.4); review of recent production of documents from FDLE (.5); initial drafting of response in opposition to motion for summary judgment (1.5).	8.40	\$ 770.00	\$ 6,468.00
05/27/2013	JULIN, THOMAS R	Review and revision of D. Robert Graham declaration in light of DOJ release of documents on March 28, 2013, and preparation of correspondence to Graham requesting review of same (3.8); review and revision of Christensen declaration and preparation of correspondence to Christensen requesting review of same (1.2).	5.00	\$ 770.00	\$ 3,850.00
05/28/2013	JULIN, THOMAS R	Telephone call from Bob Graham with preliminary suggested revisions to his declaration (.5); continued drafting of response to statement of undisputed facts and motion for summary judgment, including review of all Rosenfeld cases (3.3).	3.80	\$ 770.00	\$ 2,926.00
05/29/2013	JULIN, THOMAS R	Further conference with Bob Graham regarding revision of declaration and logistic for completion (.8); conference with Dan Christensen regarding completion of summary judgment opposition (.4); continued drafting of summary judgment opposition and response to defendants' statement of undisputed material facts requiring summary judgment (5.2).	6.40	\$ 770.00	\$ 4,928.00
05/30/2013	JULIN, THOMAS R	Completion of review draft for client of response to statement of undisputed facts and response in opposition to summary judgment.	7.30	\$ 770.00	\$ 5,621.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
05/31/2013	JULIN, THOMAS R	Completion of response to motion for summary judgment, including opposition to statement of facts and completion of declarations of D. Robert Graham and Dan Christensen (6.1); preparation of motion to strike and motion for Vaughn index and in camerainspection of documents (2.9).	9.00	\$ 770.00	\$ 6,930.00
06/13/2013	JULIN, THOMAS R	Memorandum to Carole Fernandez proposing meeting to prepare pretrial stipulation and review of response.	0.30	\$ 770.00	\$ 231.00
06/17/2013	JULIN, THOMAS R	Initial drafting of pretrial stipulation.	5.50	\$ 770.00	\$ 4,235.00
06/18/2013	JULIN, THOMAS R	Receipt and review of government's response to motion to strike David M. Hardy declaration and preparation of correspondence to client regarding same (.7); completion of initial draft of pretrial stipulation (6.5); preparation of correspondence to Carole M. Fernandez with draft pretrial stipulation (.3).	7.50	\$ 770.00	\$ 5,775.00
06/19/2013	JULIN, THOMAS R	Receipt and review of US Department of Justice request for consent to motion for protective order concerning discovery and preparation of response (.2); telephone call from Bob Graham regarding President's request for his assistance to increase transparency of US government surveillance programs and regarding his availability for trial (.8).	1.00	\$ 770.00	\$ 770.00
06/20/2013	JULIN, THOMAS R	Preparation of memorandum regarding trial strategy (.8); preparation of memorandum regarding defendants' motion for protective order (.3).	1.10	\$ 770.00	\$ 847.00
06/25/2013	JULIN, THOMAS R	Review of Department of Justice proposed changes to pretrial stipulation, preparation of revised stipulation incorporating changes, and preparation of exhibits that DOJ had not previously reviewed.	4.20	\$ 770.00	\$ 3,234.00
06/26/2013	JULIN, THOMAS R	Review of additional requested changes and preparation of further revision (1.5); preparation of plaintiffs' reply to response to motion to strike David M. Hardy declaration (4.6); preparation of plaintiffs' reply to defendants' responses to motion for Vaughn index (2.8).	8.90	\$ 770.00	\$ 6,853.00
07/01/2013	JULIN, THOMAS R	Research regarding recoverability of attorneys' fees in FOIA enforcement action when documents are produced prior to entry of judicial determination of issues raised by complaint.	1.50	\$ 770.00	\$ 1,155.00
07/05/2013	JULIN, THOMAS R	Initial drafting of response to Department of Justice Motion for a Protective Order to relieve it of any obligation to respond to interrogatories or request for production of documents (3.5); research regarding FBI's Central Records System and statement of Glenn A. Fine criticizing adequacy of the system to locate documents responsive to requests (1.5).	5.00	\$ 770.00	\$ 3,850.00
07/06/2013	JULIN, THOMAS R	Completion and filing of response to motion for protective order.	3.20	\$ 770.00	\$ 2,464.00
07/08/2013	JULIN, THOMAS R	Initial drafting of proposed finding of fact and conclusions of law for submission at Friday pretrial conference.	1.50	\$ 770.00	\$ 1,155.00
07/09/2013	JULIN, THOMAS R	Drafting of proposed findings of fact and conclusions of law for pretrial conference (7.2); correspondence to Dan Christensen regarding status of the case and pretrial conference (.3); correspondence to Christensen regarding pretrial stipulation and other recent filings (.2).	7.70	\$ 770.00	\$ 5,929.00
07/10/2013	JULIN, THOMAS R	Completion of proposed findings of fact and conclusions of law and circulation to client and Patricia Acosta for final review before submission.	3.50	\$ 770.00	\$ 2,695.00
07/11/2013	JULIN, THOMAS R	Preparation of pretrial conference materials and preparation for argument on all pending motions including motion for summary judgment, motion to strike David Hardy declaration, defense motion for protective order, motion for Vaughn index, and motion for extension of time to file answer.	7.80	\$ 770.00	\$ 6,006.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
07/12/2013	JULIN, THOMAS R	Travel to Fort Lauderdale for pretrial conference (1.0); final preparation for status conference while waiting for conference to begin (.9); participation in pretrial conference (.5); conference with client after pretrial conference (.4); return to Miami from Fort Lauderdale (.9); report on conference to team (.4); telephone calls from Bob Graham regarding identity of FBI special agent who provided FBI documents in meeting with Sean Joyce and regarding pretrial conference and procedures for searching for additional documents (.7); telephone calls to various experts regarding search protocols that likely would result in production of additional FBI records and preparation of memos from calls (3.8).	8.60	\$ 770.00	\$ 6,622.00
07/15/2013	JULIN, THOMAS R	Telephone conference with Bob Graham regarding status of the case (.3); review of correspondence from Debbie Novy regarding her database research recommendations (.2); review of Bob Graham's Miami Herald article regarding lying of government officials to the public (.2).	0.70	\$ 770.00	\$ 539.00
07/16/2013	JULIN, THOMAS R	Call from Eleanor Hill at King & Spalding regarding FBI databases and cooperation with congressional investigations (.4); conference with Deby Novy concerning database searching (.2); research regarding online sources of FBI database information (.5); review of DOJ FOIA Guide to exemptions 6 and 7(C) (.4); review of Christensen suggestions for search instructions (.2); call from Bob Graham regarding Peter Wallsten at The Washington Post and call from Peter Wallsten regarding status of the case(1.5); correspondence to Dan Christensen with orders from judge Zloch directing filings to be made concerning search method and extending time for DOJ to answer the complaint (.5); preparation of correspondence to Peter Wallsten at The Washington Post (.2); correspondence with Bob Graham regarding call from Wallsten (.2); review of Acosta recommendations for additional searches (.2).	4.10	\$ 770.00	\$ 3,157.00
07/17/2013	JULIN, THOMAS R	Review of question from Kel McClanahan regarding September 16, 2002 document and preparation of response (.3); initial drafting of proposed additional search instructions (7.1); review of suggestions from Kel McClannahan and preparation of response (.3).	7.70	\$ 770.00	\$ 5,929.00
07/18/2013	JULIN, THOMAS R	Continued drafting of proposed instructions for further FBI search for documents, including graphic analysis of FBI records released on March 28, 2013 (4.5); review of OIG Report to Congress concerning FBI Sentinel System (.3); correspondence with Kel McClanahan regarding Sentinel system, (.3); correspondence with Dan Christensen regarding completed proposed search (.1).	5.20	\$ 770.00	\$ 4,004.00
07/19/2013	JULIN, THOMAS R	Completion of motion for additional search and filing of same.	2.50	\$ 770.00	\$ 1,925.00
07/23/2013	JULIN, THOMAS R	Review of correspondence from DOJ regarding closing of appeal from March 28, 2013 decisions and preparation of correspondence to Dan Christensen regarding same.	0.80	\$ 770.00	\$ 616.00
07/29/2013	JULIN, THOMAS R	Telephone call from Bob Graham regarding status of the case and motion to compel additional search and preparation of correspondence to him with requested motion; preparation of correspondence to Dan Christensen with update concerning status of the case.	1.00	\$ 770.00	\$ 770.00
08/07/2013	JULIN, THOMAS R	Receipt and preliminary review of FBI opposition to motion to compel additional search for responsive documents and preparation of correspondence to client and others regarding same.	1.00	\$ 770.00	\$ 770.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
08/08/2013	JULIN, THOMAS R	Conference with Dan Christensen regarding FBI response and preparation of correspondence to Bob Graham regarding same.	1.50	\$ 770.00	\$ 1,155.00
08/10/2013	JULIN, THOMAS R	Drafting of reply to response to motion to compel additional search for documents.	3.50	\$ 770.00	\$ 2,695.00
08/11/2013	JULIN, THOMAS R	Continued drafting of reply to response to motion to compel; telephone conference with Bob Graham; preparation of correspondence to client regarding same.	3.50	\$ 770.00	\$ 2,695.00
08/12/2013	JULIN, THOMAS R	Review of client comments on draft reply to response to motion to require additional search for documents and revision of same.	1.50	\$ 770.00	\$ 1,155.00
08/13/2013	JULIN, THOMAS R	Review of Hijackers Timeline and other documents for references to Tampa involvement in PENTTBOMB investigation and further revision of reply memorandum.	1.70	\$ 770.00	\$ 1,309.00
08/14/2013	JULIN, THOMAS R	Completion of reply to response to motion for additional search (2.0); preparation of correction to reply (.5); call from lawyer in Minnesota who has been following the case due to handling of class action involving pipeline in Afghanistan (.5); research regarding information provided by lawyer concerning Richard Clarke's contention that CIA knew of network of Saudi's in the US helping al-Qaeda before 9/11 but did not reveal the network to the FBI because they wanted to flip the operatives and turn them into CIA sources and concern that FBI would mishandle the matter (1.2); review of Christensen article concerning government response in opposition to further search and reply and preparation of recommended changes to article (.4); correspondence with Richard Hennessey (lawyer from Minnesota (.2); correspondence to Kel	5.10	\$ 770.00	\$ 3,927.00
08/19/2013	JULIN, THOMAS R	Memo to Bob Graham regarding status of the case.	0.40	\$ 770.00	\$ 308.00
08/26/2013	JULIN, THOMAS R	Telephone call from Carol Jean LoCicero regarding possible intervention of Sarasota Herald Tribune in litigation and request for update and materials (1.5); conference call with Dan Christensen regarding request.	2.00	\$ 770.00	\$ 1,540.00
08/28/2013	JULIN, THOMAS R	Further correspondence with Carol LoCicero concerning possible intervention.	0.30	\$ 770.00	\$ 231.00
09/04/2013	JULIN, THOMAS R	Review of Sarasota Herald Tribune motion to intervene (.2); correspondence to Carol LoCicero regarding same and suggesting that it be amended to allow other media to participate on the brief (.3); preparation of correspondence to Dan Christensen regarding motion to intervene (.2).	0.70	\$ 770.00	\$ 539.00
09/06/2013	JULIN, THOMAS R	Telephone call from Dan Christensen regarding Summers conversation with Bob Graham in Ireland concerning FBI confrontation of Graham at airport and preparation of response regarding possibility that confrontation took place at Dulles on day after meeting with Sean Joyce.	0.50	\$ 770.00	\$ 385.00
09/17/2013	JULIN, THOMAS R	Preparation of materials for call from Casey Frank concerning Miami Herald joinder in lawsuit through intervention (.5); call from Frank regarding same (.5); call to Dan Christensen regarding probable Miami Herald intervention (.5).	1.50	\$ 770.00	\$ 1,155.00
09/19/2013	JULIN, THOMAS R	Review of government opposition to motion to intervene and preparation of correspondence to client regarding same.	0.50	\$ 770.00	\$ 385.00
10/02/2013	JULIN, THOMAS R	Telephone call from Dan Christensen regarding 9/11 families and memo from then and preparation of correspondence to Carol LoCicero advising her of gratitude of 9/11 families for Herald Tribune participation in the litigation (1.0); telephone call from Mike Pollick regarding further report on the litigation (.5).	1.50	\$ 770.00	\$ 1,155.00
10/09/2013	JULIN, THOMAS R	Review of Department of Justice opposition to Miami Herald motion to intervene and preparation of correspondence to Dan Christensen regarding the same.	0.30	\$ 770.00	\$ 231.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
10/10/2013	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen regarding participation of Tampa Bay Times in litigation.	0.30	\$ 770.00	\$ 231.00
10/25/2013	JULIN, THOMAS R	Review of opinion on reconsideration in Truthout v. US Department of Justice referencing David M. Hardy declaration and review of arguments filed in that case regarding Hardy declaration filed in Broward Bulldog litigation.	1.50	\$ 770.00	\$ 1,155.00
12/01/2013	JULIN, THOMAS R	Review of notice of appearance filed by Dexter Lee, research regarding background of Dexter Lee, preparation of correspondence to client regarding appearance of Dexter Lee and lack of any other movement in the litigation.	0.40	\$ 770.00	\$ 308.00
12/03/2013	JULIN, THOMAS R	Review of question from client regarding Dexter Lee and preparation of response with background on FOIA litigation handled by Lee (.3); research concerning recoverability of attorneys' fees in litigation that results in production of records not pursuant to court order (2.3); research regarding mandatory declassification review deadlines (1.0)	3.60	\$ 770.00	\$ 2,772.00
03/19/2014	JULIN, THOMAS R	Review of order from Judge Zloch granting leave for The Miami Herald and Sarasota Herald Tribune to file amicus curiae brief and preparation of correspondence to client regarding same.	0.50	\$ 770.00	\$ 385.00
03/21/2014	JULIN, THOMAS R	Review of correspondence regarding Philadelphia Inquirer interest in intervening in FOIA action; memo to Carol LoCicero regarding same; telephone call from Chris Mondics, business editor at The Inquirer regarding interest in the litigation and further correspondence to LoCicero regarding same.	1.20	\$ 770.00	\$ 924.00
03/31/2014	JULIN, THOMAS R	Telephone call from Sarasota- Herald Tribune reporter Michael Pollick regarding order entered by Judge Zloch compelling Justice Department to do better search (.2); receipt and review of order; (.3); preparation of correspondence to client regarding significance of the order (.4); correspondence with Carol LoCicero regarding order (.2); review of Broward Bulldog story regarding decision of Judge Zloch to order FBI to conduct a more thorough search (.3).	1.10	\$ 770.00	\$ 847.00
04/02/2014	JULIN, THOMAS R	Travel to Miami Lakes and meeting with Bob Graham and Dan Christensen updating them on the status of the litigation and significance of order compelling additional search for responsive documents and return to Miami.	4.00	\$ 795.00	\$ 3,180.00
04/04/2014	JULIN, THOMAS R	Telephone call from Michael Pollick regarding Judge Zloch's order compelling additional searches (.5); telephone call to Dan Christensen regarding judge's order compelling additional searches (.5).	1.00	\$ 795.00	\$ 795.00
04/05/2014	JULIN, THOMAS R	Review of correspondence from Carol LoCicero regarding order and preparation of response (.3); preparation of correspondence to Bob Graham regarding Judge Zloch's order compelling FBI to conduct a more thorough search (.3); review of Christensen report regarding Judge Zloch's order and preparation of suggestions regarding same (.4).	1.00	\$ 795.00	\$ 795.00
04/16/2014	JULIN, THOMAS R	Review of request from Dexter Lee to agreement to motion for enlargement of time to provide documents to the court and preparation of response indicating agreement to motion (.3); call to Dan Christensen regarding request (.3); preparation of correspondence to Dan Christensen regarding request (.2).	0.80	\$ 795.00	\$ 636.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/18/2014	JULIN, THOMAS R	Review of order on motion for enlargement of time and for partial reconsideration of order compelling additional search for responsive documents (.4); call to court regarding scanning issue (.1); call to client regarding significance or order on denial of reconsideration (.3); call from Robert Hennessey regarding the litigation and potential significance of rulings to lawsuit by 9/11 victims against Kingdom of Saudi Arabia (.3); review of government's notice of filing classified documents for in camera review and conference with client regarding same (.3); preparation of outline of correspondence to Dexter Lee regarding implementation of court order compelling further search for responsive documents (.4); analysis of Zloch order compelling production and whether correspondence with Justice Department is needed (1.5); review of draft report regarding order <i>denying motion for reconsideration of order (2)</i>	3.60	\$ 795.00	\$ 2,862.00
04/23/2014	JULIN, THOMAS R	Conference with Steve Meyer regarding status of the request and preparation of response with Judge Zloch's orders for further analysis.	0.50	\$ 795.00	\$ 397.50
04/28/2014	JULIN, THOMAS R	Preparation of correspondence to Dexter Lee requesting confirmation that documents have been delivered to Judge Zloch pursuant to prior order (.3); preparation of correspondence to client regarding status of the case (.2).	0.50	\$ 795.00	\$ 397.50
04/29/2014	JULIN, THOMAS R	Memo to client regarding lack of response from Dexter lee for request for information concerning compliance with court order.	0.30	\$ 795.00	\$ 238.50
04/30/2014	JULIN, THOMAS R	Review of correspondence from Dexter Lee indicating receipt of 27 boxes of classified documents and difficulties that the Justice Department had in delivering the boxes to Judge Zloch in light of the lack of a secure facility for classified documents (.3); preparation of correspondence to client regarding Lee correspondence (.2); conference with client regarding noncompliance with prior order and significance of discovery of additional documents of classified documents (.4); review of draft concerning the matter and conference with client (.5); telephone calls from other press regarding same (.4); preparation of correspondence to Dexter Lee requesting explanation regarding additional four boxes and information regarding number of classified documents produced and responsiveness of previously produced documents (.5); conference with Terry Connor regarding procedures used to obtain lawyer clearance to review classified documents (.5); research regarding clearance procedures used in <i>Guantanamo detainee cases (1 5)</i>	4.30	\$ 795.00	\$ 3,418.50
05/01/2014	JULIN, THOMAS R	Review of comments by Steve Meyers regarding displayed text versus copied text from OCR documents and preparation of correspondence to Paulo Lima regarding same (.5); review of client request for recommendation regarding objections to proposed government procedure for judicial review of documents produced in camera and preparation of recommendation against further immediate action (.5).	1.00	\$ 795.00	\$ 795.00
05/01/2014	JULIN, THOMAS R	Review of government notice of filing and preparation of correspondence to client regarding same.	0.30	\$ 795.00	\$ 238.50
05/09/2014	JULIN, THOMAS R	Review of DOJ notice of filing third declaration of David Hardy and disclosure of additional documents (.6); preparation of correspondence to client regarding recent filing and conference with client (.5); prepublication review of article regarding release of four additional pages and correspondence to Dan Christensen regarding same (.5).	1.60	\$ 795.00	\$ 1,272.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
05/13/2014	JULIN, THOMAS R	Review of appeal of US Department of Justice release of four additional pages and editing of same to include material concerning significance of the requested records to family members of the 9/11 victims (1.5); review and editing of Dan Christensen article regarding investments of the governor and first lady in order to conceal assets (3.5).	5.00	\$ 795.00	\$ 3,975.00
05/17/2014	JULIN, THOMAS R	Review of correspondence from Dan Christensen regarding receipt of four additional pages from Justice Department (.2); preparation of correspondence to Dan Christensen regarding submission of appeal of DOJ withholding of information in the four pages (.2); review of Sarasota Herald Tribune reporting on the case (.3).	0.70	\$ 795.00	\$ 556.50
06/05/2014	JULIN, THOMAS R	Review of correspondence from Dan Christensen concerning deadline for submission by FBI of report to the court regarding results of manual review of 80,000 pages of documents and preparation of response to him explaining status of the obligation to report.	0.60	\$ 795.00	\$ 477.00
06/06/2014	JULIN, THOMAS R	Receipt and review of FBI and Justice Department report to the Court regarding results of additional search and Fourth Declaration of David M. Hardy regarding search methodology and results and referencing the filing of a fifth declaration on an ex parte and in camera basis (1.5); conference with Dan Christensen regarding the filing and strategy for moving forward (.5); review of draft article by Dan Christensen concerning significance of FBI failure to locate documents responsive to his request and preparation of comments on same (.5); preparation of materials for Dan Christensen regarding provisions of FOIA that allow FBI to treat documents as though they do not exist (.3); review of correspondence from client asking whether FBI had been ordered to contact Sheffield and Jacqueline Maguire and preparation of response showing this had been requested but not ordered (.3).	3.10	\$ 795.00	\$ 2,464.50
06/09/2014	JULIN, THOMAS R	Review of client notation of case in which court had concluded that FBI may not mislead the court even if it has statutory authority to treat documents as though they are not subject to FOIA requirements .	0.50	\$ 795.00	\$ 397.50
08/13/2014	JULIN, THOMAS R	Telephone call from Bob Graham regarding status of the FOIA case.	0.50	\$ 795.00	\$ 397.50
04/03/2015	JULIN, THOMAS R	Preparation of proposed correspondence to Dexter Lee requesting agreement to deposition of agent who authorized key document and other discovery relation to 9-11 Review Commission report and preparation of correspondence to Dan Christensen requesting his review of same (1.5); review of Christensen response (.1); transmittal of correspondence to Dexter Less (.1); transmittal of confirming email to Christensen (.1).	1.80	\$ 820.00	\$ 1,476.00
04/04/2015	JULIN, THOMAS R	Review of response from Dexter Lee and preparation of response and notification of client regarding same (.2); preparation of additional request to Dexter Lee (.2).	0.40	\$ 820.00	\$ 328.00
04/06/2015	JULIN, THOMAS R	Review of correspondence from Dan Christensen regarding Review Commission report and preparation of response to him regarding inadequacies of the report to critique FBI efforts to implement suggested changes or evidence subsequently called to its attention.	0.50	\$ 820.00	\$ 410.00

Exhibit B to Declaration of Thomas R. Julin - Timekeeper Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/09/2015	JULIN, THOMAS R	Receipt and review of Dexter Lee response to request for agreement to discovery in light of 9-11 Review Commission Report and preparation of correspondence to client regarding same.	0.30	\$ 820.00	\$ 246.00
04/20/2015	JULIN, THOMAS R	Drafting of request for status conference (3.6); preparation of request to Dexter Lee for agreement to request (.5).	4.10	\$ 820.00	\$ 3,362.00
04/21/2015	JULIN, THOMAS R	Initial drafting of request for status conference regarding (1) status of court review of documents, (2) recent developments in the case, (3) whether discovery will be allowed, and (4) setting the case for trial.	4.00	\$ 820.00	\$ 3,280.00
04/22/2015	JULIN, THOMAS R	Continued drafting of request for status conference and assembly of supporting materials	3.50	\$ 820.00	\$ 2,870.00
04/23/2015	JULIN, THOMAS R	Completion of request for status conference regarding court review of records submitted in camera and to review whether discovery would be permitted to a limited extent.	1.20	\$ 820.00	\$ 984.00
05/07/2015	JULIN, THOMAS R	Review of correspondence from Dan Christensen (.5); review of request from Bob Graham regarding status of the case (.3); preparation of responses to Christensen and Graham regarding status of request for status conference and opportunity to depose witness (.2).	1.00	\$ 820.00	\$ 820.00
05/11/2015	JULIN, THOMAS R	Receipt and review of defendants' response to request for status conference and preparation of correspondence to client regarding same.	1.00	\$ 820.00	\$ 820.00
05/19/2015	JULIN, THOMAS R	Drafting of proposed reply to response to request for status conference (1.5); call from Dan Christensen regarding status of the case (.5).	2.00	\$ 820.00	\$ 1,640.00
	Subtotal		434.40	\$ 765.36	\$ 332,474.50
08/03/2015	JULIN, THOMAS R	Telephone call from Dan Christensen regarding status of the FOIA case.	0.20	\$ 820.00	\$ 164.00
04/17/2014	LIMA, PAULO R	Reviewed April 4 order of the Court and Defendant's Motion for Reconsideration and supporting papers. Strategic discussion with T. Julin and the client regarding planned response to Plaintiff's motion.	4.30	\$ 510.00	\$ 2,193.00
04/18/2014	LIMA, PAULO R	Research and drafting opposition to Plaintiff's motion for reconsideration of DE 60 (4.25 hours). Reviewed case file, prepared summary of documents to be produced pursuant to the Court's order and discussed strategy with T. Julin (2.75 hours). Drafted letter to opposing counsel regarding 27 classified pages filed today for the Court's in camera review (1 hour).	8.00	\$ 510.00	\$ 4,080.00
04/30/2014	LIMA, PAULO R	Reviewed email from government discussing production of documents to the Court for in-camera review and discussed same with T. Julin. (.5 hours). Researched caselaw regarding challenging classification decisions, including potential for counsel to obtain security clearance to review documents.	4.80	\$ 510.00	\$ 2,448.00
05/05/2014	LIMA, PAULO R	Strategic discussion with T. Julin regarding next steps, including potential to move for access to classified documents.	1.00	\$ 510.00	\$ 510.00
05/09/2014	LIMA, PAULO R	Review and analysis of the Third Hardy Declaration and four pages of newly-released documents. Call with client to discuss same.	2.00	\$ 510.00	\$ 1,020.00
06/06/2014	LIMA, PAULO R	Review and analysis of Fourth Hardy Declaration (1 hour.) Call with client re: government's filing. (.75 hours). Discussion with T. Julin	2.50	\$ 510.00	\$ 1,275.00
04/21/2015	LIMA, PAULO R	Reviewed and made suggested revisions to Plaintiff's Motion for Status Conference.	2.50	\$ 535.00	\$ 1,337.50
	Subtotal		25.30	\$ 514.92	\$ 13,027.50
TOTAL			615.35	\$ 666.16	\$ 409,919.25

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
05/29/2012	JULIN, THOMAS R	Review of proposal for FOIA enforcement action against US Department of Justice regarding records relating to FBI investigation of Saudi nationals in Sarasota regarding possible involvement in 9/11 attack (3.0); drafting of complaint, cast of characters, and chronology (3.0).	6.00	\$ 750.00	\$ 4,500.00
05/30/2012	JULIN, THOMAS R	Continued drafting of complaint against Justice Department (2.5) and correspondence with Justice Department concerning conflict waiver (.25).	2.75	\$ 750.00	\$ 2,062.50
05/31/2012	DREIER, DOUGLAS C	Analysis of recent 11th Cir. and S.D. Fla. cases regarding FOIA's personal privacy exemption	2.25	\$ 195.00	\$ 438.75
05/31/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding 11th Cir. and S.D. Fla. case law	0.50	\$ 195.00	\$ 97.50
05/31/2012	JULIN, THOMAS R	Research concerning status of FOIA attorneys' fees statute (1.0); preparation of correspondence to client regarding conditions under which representation would be accepted (.5); preparation of research assignment for summer associate (.5).	2.00	\$ 750.00	\$ 1,500.00
06/01/2012	DREIER, DOUGLAS C	Analysis of cases cited by the Department of Justice when rejecting to client's FOIA request	0.25	\$ 195.00	\$ 48.75
06/04/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding 11th Circuit and S.D. Fla. precedent on Exemption 7(C)	3.25	\$ 195.00	\$ 633.75
06/04/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding the need for the FBI to conduct a search of its records in the first place (Blackwell v. FBI)	0.50	\$ 195.00	\$ 97.50
06/04/2012	JULIN, THOMAS R	Drafting of engagement letter.	1.00	\$ 750.00	\$ 750.00
06/05/2012	DREIER, DOUGLAS C	Preparation of legal memorandum regarding client's options for litigating his FOIA request	3.50	\$ 195.00	\$ 682.50
06/05/2012	DREIER, DOUGLAS C	Revisions to legal memorandum regarding client's FOIA request	1.00	\$ 195.00	\$ 195.00
06/06/2012	JULIN, THOMAS R	Review of request for advice concerning removal of certain postings and preparation of response.	0.50	\$ 750.00	\$ 375.00
06/07/2012	DREIER, DOUGLAS C	Analysis of all federal case law regarding FOIA Exemption 7(C)	4.25	\$ 195.00	\$ 828.75
06/08/2012	DREIER, DOUGLAS C	Preparation of complaint to file against DOJ regarding client's FOIA request	5.00	\$ 195.00	\$ 975.00
06/11/2012	DREIER, DOUGLAS C	Revisions to FOIA complaint regarding Abdulaziz al-Hijji	0.75	\$ 195.00	\$ 146.25
06/11/2012	JULIN, THOMAS R	Preliminary review of draft complaint to enforce the Freedom of Information Act.	1.50	\$ 750.00	\$ 1,125.00
06/15/2012	DREIER, DOUGLAS C	Analysis of case law to determine the evidentiary burden necessary to bring a FOIA claim	0.25	\$ 195.00	\$ 48.75
06/15/2012	JULIN, THOMAS R	Further review of draft complaint and preparation of correspondence to client regarding modifications.	1.00	\$ 750.00	\$ 750.00
06/25/2012	JULIN, THOMAS R	Review of inquiry from Dan Christensen and preparation of response.	0.50	\$ 750.00	\$ 375.00
06/26/2012	DREIER, DOUGLAS C	Confer with T. Julin and D. Christensen regarding how to proceed with FOIA complaint	1.75	\$ 195.00	\$ 341.25
06/26/2012	JULIN, THOMAS R	Preparation for telephone call with Dan Christensen (1.0); telephone conference with Dan Christensen regarding possible FOIA action against Department of Justice (1.5).	2.50	\$ 750.00	\$ 1,875.00
06/27/2012	DREIER, DOUGLAS C	Read potentially relevant parts of Anthony Summers' book, The Eleventh Day, to prepare for revisions to the FOIA complaint	1.50	\$ 195.00	\$ 292.50
06/28/2012	DREIER, DOUGLAS C	Revise FOIA complaint, conducting additional research as necessary	4.50	\$ 195.00	\$ 877.50

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
06/28/2012	JULIN, THOMAS R	Review of Christensen correspondence to US Department of Justice.	0.50	\$ 750.00	\$ 375.00
07/01/2012	JULIN, THOMAS R	Preparation of revision to complaint and correspondence to client with recommendation for proceeding cautiously.	2.50	\$ 750.00	\$ 1,875.00
07/05/2012	DREIER, DOUGLAS C	Confer with Dan Christensen and Tom Julin regarding how to proceed with FOIA complaint	1.25	\$ 195.00	\$ 243.75
07/05/2012	DREIER, DOUGLAS C	Analysis of federal law to determine whether the FBI was required to disclose records to Congress	3.00	\$ 195.00	\$ 585.00
07/05/2012	DREIER, DOUGLAS C	Revisions to FOIA complaint	2.25	\$ 195.00	\$ 438.75
07/05/2012	JULIN, THOMAS R	Telephone conference with Dan Christensen regarding possible lawsuit against Justice Department (2.0); review of material provided by Doug Dreier from St. Petersburg Times article critical of Bulldog reporting (.5).	2.50	\$ 750.00	\$ 1,875.00
07/06/2012	DREIER, DOUGLAS C	Revisions to FOIA complaint; additional analysis of news articles and Sen. Graham's affidavit in In re Terrorist Attacks	4.00	\$ 195.00	\$ 780.00
07/14/2012	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen responding to inquiry regarding status of case.	0.25	\$ 750.00	\$ 187.50
07/26/2012	JULIN, THOMAS R	Review of recent decision, National Day Laborer Organizing Network v. US Immigration and Customs Enforcement Agency and correspondence with Doug Dreier regarding same (1.5); telephone call from Norm Davis requesting information regarding opportunities to work for the Broward Bulldog (.75); preparation of correspondence to Dan Christensen regarding same (.25).	2.50	\$ 750.00	\$ 1,875.00
08/20/2012	ACOSTA, PATRICIA	Consideration of background facts concerning FOIA claims; review and edit draft complaint.	3.50	\$ 490.00	\$ 1,715.00
08/21/2012	ACOSTA, PATRICIA	Continue evaluation of background facts and law governing exemption 7 under FOIA.	3.50	\$ 490.00	\$ 1,715.00
08/22/2012	ACOSTA, PATRICIA	Conduct legal research and analysis of what constitutes private information under exemption 7 of FOIA.	4.50	\$ 490.00	\$ 2,205.00
08/28/2012	ACOSTA, PATRICIA	Incorporate D. Christiansen's proposed edits to the complaint and make additional edits; examine issue of whether FBI is an appropriate party.	2.50	\$ 490.00	\$ 1,225.00
08/28/2012	JULIN, THOMAS R	Review of Dan Christensen comments on draft complaint and revision to implement suggestions by both Summers and Christensen.	3.50	\$ 750.00	\$ 2,625.00
08/29/2012	ACOSTA, PATRICIA	Continue evaluation of privacy interest issues asserted by the FBI under FOIA.	3.50	\$ 490.00	\$ 1,715.00
08/29/2012	JULIN, THOMAS R	Completion of initial revisions to complaint on basis of Summers and Christensen comments (2.0); drafting of engagement letter for the matter (1.3); preparation of correspondence to Dan Christensen with complaint revisions addressing Anthony Summers recommended changes and with engagement letter (.2); preparation of response to Christensen inquiry concerning response of Jamie Cole to public records request (.5).	4.00	\$ 750.00	\$ 3,000.00
08/30/2012	ACOSTA, PATRICIA	Gather and review exhibits to the complaint and make additional edits to the complaint.	1.50	\$ 490.00	\$ 735.00
09/02/2012	JULIN, THOMAS R	Editing of complaint to enforce the Freedom of Information Act.	3.50	\$ 750.00	\$ 2,625.00
09/03/2012	ACOSTA, PATRICIA	Further evaluation of information provided by Dan Christensen regarding allegations in the complaint; conduct independent research to support allegations.	3.50	\$ 490.00	\$ 1,715.00
09/03/2012	ACOSTA, PATRICIA	Analysis of public information about extent of FBI investigation into the hijackers' contacts in the USA.	4.50	\$ 490.00	\$ 2,205.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
09/04/2012	ACOSTA, PATRICIA	Telephone conference with the client regarding allegations in the complaint; make final edits to the complaint before filing.	3.80	\$ 490.00	\$ 1,862.00
09/04/2012	JULIN, THOMAS R	Review of Mingo v. US Department of Justice and other cases concerning proper defendant where FOIA request is directed to the FBI and further revision of complaint in preparation for filing on September 5 (3.6); review of whether defendants will be able to assert in litigation exemption not asserted as basis for affirming FBI denial of production of documents (.5); preparation of instructions for service of summons on FBI and Department of Justice (.2); transmittal of complaint for final review to client with instructions for review (.3).	4.60	\$ 750.00	\$ 3,450.00
09/05/2012	ACOSTA, PATRICIA	Conduct legal research and analysis of cases interpreting what constitutes an unwarranted invasion of privacy under Exemption 7 of FOIA.	3.50	\$ 490.00	\$ 1,715.00
09/05/2012	ACOSTA, PATRICIA	Conduct legal research concerning public interest necessary to overcome privacy interest under exemption 7.	3.70	\$ 490.00	\$ 1,813.00
09/05/2012	JULIN, THOMAS R	Review of client suggestion for changes to the complaint and exhibits (.2); conference with client regarding further revisions to the complaint (1.1); completion of changes to the complaint (3.2); memo to client confirming filing of complaint (.3); research concerning Freedom of Information act cases handles by Judge Zloch (.5); memo to client concerning assignment of case to Judge William Zloch (.3).	5.60	\$ 750.00	\$ 4,200.00
09/06/2012	ACOSTA, PATRICIA	Analysis of joint congressional report and 9/11 commission report concerning disclosure of facts about FBI investigations.	3.50	\$ 490.00	\$ 1,715.00
09/06/2012	ACOSTA, PATRICIA	Analysis of public information about extent of FBI investigation into the hijackers' contacts in the USA.	4.50	\$ 490.00	\$ 2,205.00
09/07/2012	ACOSTA, PATRICIA	Continue to conduct research concerning public interest necessary to overcome privacy interest under Exemption 7 of FOIA.	5.50	\$ 490.00	\$ 2,695.00
09/10/2012	ACOSTA, PATRICIA	Continue analysis of cases interpreting Exemption 7 of FOIA in preparation of draft summary judgment motion.	4.50	\$ 490.00	\$ 2,205.00
09/10/2012	JULIN, THOMAS R	Correspondence with Douglas Dreier regarding status of the case.	0.50	\$ 750.00	\$ 375.00
09/11/2012	ACOSTA, PATRICIA	Evaluate Bob Graham's affidavit and other pleadings filed in the new york litigation against the government of Saudi Arabia; continue analysis of potential evince and cases in preparation of summary judgment motion.	5.50	\$ 490.00	\$ 2,695.00
09/12/2012	ACOSTA, PATRICIA	Conduct legal research and analysis concerning: standard required to dispense with Vaughn index requirement; burden of proof under Exemption 7; reduction of privacy interests when facts regarding investigation are published ; extent of public interest in learning facts to prevent terrorists or genocide acts.	7.50	\$ 490.00	\$ 3,675.00
09/13/2012	ACOSTA, PATRICIA	Continue to research and analyze law and facts in preparation for motion for summary judgment.	7.50	\$ 490.00	\$ 3,675.00
09/24/2012	ACOSTA, PATRICIA	Continue preparation of summary judgment motion.	3.50	\$ 490.00	\$ 1,715.00
10/11/2012	ACOSTA, PATRICIA	Consideration of issues concerning deficient service of process; research appropriate service method; research appropriate agency to discuss service issue with; various conferences with local US attorneys offices re: same; coordinate re-service of complaint	3.70	\$ 490.00	\$ 1,813.00
10/18/2012	JULIN, THOMAS R	Review of procedural problem with service on Department of Justice in Washington and preparation of memorandum to client regarding same.	1.00	\$ 750.00	\$ 750.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
11/15/2012	JULIN, THOMAS R	Telephone call from Carole Fernandez concerning her representation of the government in the case (.4); research regarding prior FOIA cases handled by Carole Fernandez and preparation of memo to file regarding same (3.4); preparation of correspondence to client regarding request from Fernandez for voluntary amendment of complaint to delete certain allegations (.5).	4.30	\$ 750.00	\$ 3,225.00
11/16/2012	JULIN, THOMAS R	Completion of correspondence to Dan Christensen concerning call from Carole Fernandez.	0.50	\$ 750.00	\$ 375.00
11/19/2012	ACOSTA, PATRICIA	Review and consideration of motion to dismiss; evaluate cases addressed in the motion in preparation of response.	3.50	\$ 490.00	\$ 1,715.00
11/19/2012	JULIN, THOMAS R	Review of motion to dismiss the complaint and preparation of correspondence to client regarding proposed response.	0.50	\$ 750.00	\$ 375.00
11/20/2012	ACOSTA, PATRICIA	Review and consideration of motion to dismiss; consideration of issues regarding responsive arguments.	1.00	\$ 490.00	\$ 490.00
11/20/2012	JULIN, THOMAS R	Review of request from client concerning motion to dismiss and preparation of response.	0.20	\$ 750.00	\$ 150.00
11/26/2012	JULIN, THOMAS R	Drafting of response to motion to dismiss.	4.00	\$ 750.00	\$ 3,000.00
11/28/2012	ACOSTA, PATRICIA	Work on preparation of response to motion to dismiss.	4.50	\$ 490.00	\$ 2,205.00
11/29/2012	JULIN, THOMAS R	Continued drafting of memo in opposition to motion to dismiss.	2.50	\$ 750.00	\$ 1,875.00
11/30/2012	ACOSTA, PATRICIA	Finalize preparation of insert to motion to dismiss; evaluate issues re: upcoming scheduling deadline and draft joint scheduling report.	2.50	\$ 490.00	\$ 1,225.00
11/30/2012	JULIN, THOMAS R	Completion of draft response to motion to dismiss the complaint (4.0); preparation of correspondence to client explaining memo, time for responses, and deadlines for pretrial compliance (.5); preparation of correspondence to Carole Fernandez requesting Rule 26 meeting to prepare scheduling conference report (.5).	5.00	\$ 750.00	\$ 3,750.00
12/01/2012	JULIN, THOMAS R	Further review and editing of response.	0.50	\$ 750.00	\$ 375.00
12/02/2012	JULIN, THOMAS R	Preparation of memorandum in opposition to motion to dismiss complaint.	4.50	\$ 750.00	\$ 3,375.00
12/03/2012	JULIN, THOMAS R	Further drafting of memorandum in opposition to motion to dismiss complaint (4.0); preparation of correspondence to client regarding status of the case (.3); correspondence with Carole Fernandez regarding meeting to prepare proposed scheduling report (.3).	4.60	\$ 750.00	\$ 3,450.00
12/10/2012	JULIN, THOMAS R	Review of motion to compel Vaughn index and all recent Eleventh Circuit cases and other cases considering Vaughn index issues.	3.50	\$ 750.00	\$ 2,625.00
12/11/2012	JULIN, THOMAS R	Completion of draft scheduling report and submission to Carole Fernandez for her review in advance of meeting.	2.50	\$ 750.00	\$ 1,875.00
12/12/2012	ISANI, JAMIE Z	Confer with T. Julin regarding case strategy.	0.50	\$ 550.00	\$ 275.00
12/12/2012	JULIN, THOMAS R	Final preparation for conference of counsel to prepare scheduling report (1.0); participation in conference (1.0); telephone conference with client regarding results of scheduling conference (.5); preparation of correspondence to client summarizing results of conference and recommending strategy for proceeding with the case (.7); request to client for email from Susan Martin concerning FBI statement (.3).	3.00	\$ 750.00	\$ 2,250.00
12/13/2012	ISANI, JAMIE Z	Analysis of evidentiary issues pertaining to admission of party e-mails.	0.50	\$ 550.00	\$ 275.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
12/13/2012	JULIN, THOMAS R	Preparation of correspondence to client regarding communications with Tony Summers (.5); preparation of stipulation regarding service of the complaint and correspondence to Carole Fernandez requesting agreement to same (.6); preparation of analysis of National Archives & Records Administration decision from US Supreme Court and memo regarding same in order to prepare for argument that burden of proof is on plaintiff to show that documents are not exempt from disclosure requirements (1.5); preparation of memo regarding declarations needed for summary judgment motion (1.5); memo to client regarding declarations needed (.4); review of reply to response to motion to dismiss and preparation of correspondence to client regarding same (.7); review of email from Susan Martin containing FBI press release and research regarding evidentiary issues raised by email (1.3).	6.50	\$ 750.00	\$ 4,875.00
12/14/2012	JULIN, THOMAS R	Review of National Archives & Records Administration v. Favish in light of comments from opposing counsel concerning applicability of the case (.5); preparation of correspondence to client regarding Carole Fernandez remarks concerning inadequacy of speculation that records would reveal wrongdoing by the government (.4); review of correspondence from Dan Christensen regarding preparation of declarations of witnesses and preparation of response (.3); preparation of public records request to JulieKlahr for records relating to DCF contract (4.0).	5.20	\$ 750.00	\$ 3,900.00
12/17/2012	JULIN, THOMAS R	Close review of request for public records concerning Concordia contracts with third party vendors and preparation of questions to Dan Christensen regarding same.	3.00	\$ 750.00	\$ 2,250.00
12/18/2012	ACOSTA, PATRICIA	Evaluate issues concerning initial disclosures and prepare draft of disclosures; consider issues concerning desirability of motion to compel filing of joint scheduling report; correspond with C. Fernandez re; extension of time for filing joint scheduling report;	2.50	\$ 490.00	\$ 1,225.00
12/18/2012	JULIN, THOMAS R	Conference with Patricia Acosta concerning preparation of motion to compel compliance with Rule 16.	1.50	\$ 750.00	\$ 1,125.00
01/01/2013	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen concerning status. of the case.	0.50	\$ 750.00	\$ 375.00
01/02/2013	JULIN, THOMAS R	Initial drafting of Declaration of Daniel Robert "Bob" Graham to establish existence of requested records. (3.5); retrieval and review of Joint Inquiry Report and 9/11 Commission report for use in connection with preparation of Graham declaration (2.3); conference with Dan Christensen regarding witnesses to contact for declarations (1.2).	7.00	\$ 750.00	\$ 5,250.00
01/03/2013	JULIN, THOMAS R	Further drafting of proposed declarations for witnesses.	2.20	\$ 750.00	\$ 1,650.00
01/04/2013	ACOSTA, PATRICIA	Evaluate draft declarations and finalize draft of initial disclosures.	1.80	\$ 490.00	\$ 882.00
01/04/2013	JULIN, THOMAS R	Review of FBI email (.3); conference with Bob Graham for purposes of revision of proposed declaration (1.1); revision of first draft of proposed declaration on basis of Graham comments (2.6); conference with Larry Berberich (.5); conference with Jone Weist (.7); preparation of correspondence to Jone Weist and to Dan Christensen regarding results of interviews (.5); conference with Christensen regarding Graham comments (.5); memo to Christensen concerning Larry Berberich comments (.3).	6.50	\$ 750.00	\$ 4,875.00
01/07/2013	ACOSTA, PATRICIA	Continue to work on the preparation of initial disclosures.	0.80	\$ 490.00	\$ 392.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
01/07/2013	JULIN, THOMAS R	Preparation of draft declaration for Larry Berberich (2.5); preparation of declaration of Jone Weist (2.1); preparation of correspondence to Dan Christensen regarding review and revision of proposed declarations (.3); revision of correspondence to Julie Klahr requesting public records concerning Broward Behavioral Health Coalition Inc. and Concordia Care, Inc. (1.3).	6.20	\$ 750.00	\$ 4,650.00
01/08/2013	ACOSTA, PATRICIA	Evaluate order of instructions entered by the court; consider issues regarding deadlines set in order and pending motions for extension of deadlines; confer with opposing counsel regarding scheduling of scheduling conference in accordance with order.	1.20	\$ 490.00	\$ 588.00
01/08/2013	JULIN, THOMAS R	Conference with Dan Christensen regarding declarations (.5); revision of Weist and Berberich declarations and preparation of correspondence to witnesses with declarations (1.5); revision of Graham declaration and preparation of correspondence to him regarding same (1.2); preparation of draft initial disclosure of witnesses and documents that may be used in support of claims (3.8).	7.00	\$ 750.00	\$ 5,250.00
01/10/2013	JULIN, THOMAS R	Research regarding executive orders governing disclosure of classified information (1.0); preparation for telephone conference with Bob Graham concerning his declaration (.7); telephone conference with Bob Graham concerning his declaration (1.3); telephone conference with Dan Christensen regarding conference with Graham (.4); preparation of proposed questions for Jim Wolfe for Bob Graham to ask concerning FBI records shown to Graham (1.2); preparation of correspondence to Christensen regarding draft questions to Wolfe (.2).	4.80	\$ 750.00	\$ 3,600.00
01/11/2013	JULIN, THOMAS R	Drafting of declaration for Jone Barlow Weist and research regarding Weist background for declaration (1.5); completion of draft questions for Jim Wolfe, security director of the U.S. Senate Intelligence Committee and preparation of correspondence to Bob Graham regarding same (1.5); review of Weist's requested revisions to her declaration and preparation of memo to Weist regarding same with requested revisions (1.2).	4.20	\$ 750.00	\$ 3,150.00
01/14/2013	ACOSTA, PATRICIA	Consideration of issues regarding case strategy and status of scheduling issues; evaluate and provide comments to draft declarations.	1.50	\$ 490.00	\$ 735.00
01/15/2013	ACOSTA, PATRICIA	Consideration of issues regarding schedule and strategy in light of government's contention that it has no documents; scheduling conference with Carol Fernandez	1.50	\$ 490.00	\$ 735.00
01/15/2013	JULIN, THOMAS R	Preparation for conference call (.4); telephone conference with Carole Fernandez regarding revision and submission of scheduling conference and proposed scheduling order as required by court order (.6); review and revision of scheduling conference report based on requested revisions from Fernandez (2.8); conference with Dan Christensen regarding requested revisions to scheduling report and preparation of further revisions based on Christensen scheduling issues (.4); completion of declaration revisions for Bob Graham declaration and preparation of correspondence to him regarding same (.4); telephone call from Bob Graham regarding his review of declaration and timing of declaration submission (.2); preparation of correspondence to Bob Graham concerning schedule of lawsuit and immediate issues (.3).	5.10	\$ 750.00	\$ 3,825.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
01/16/2013	JULIN, THOMAS R	Review of further proposals for revision to scheduling conference report from Carole Fernandez, implementation of proposed changes, preparation of correspondence to Fernandez confirming that changes have been made, review of agreement to same from Fernandez, and submission of report to the court.	0.70	\$ 750.00	\$ 525.00
01/18/2013	JULIN, THOMAS R	Telephone call to Larry Berberich regarding changes to be made in draft declaration (.5); revision of declaration in accordance with Berberich's requests (.5); preparation of correspondence to Berberich with revised declaration and requesting execution (.2); drafting of possible declaration for Patrick Gallagher after review of references to Gallagher in articles and other materials (1.4); search for information about Gallagher (.3); telephone call to Patrick Gallagher to discuss possible declaration (.5); revision of declaration (.8); preparation of correspondence to Gallagher with proposed declaration (.2); preparation of draft declaration for Louise Tessier (1.1); preparation of correspondence to Dan Christensen regarding progress with Berberich and Gallagher (.3).	5.60	\$ 750.00	\$ 4,200.00
01/21/2013	JULIN, THOMAS R	Memo to Dan Christensen regarding Hammoud documents and Gallagher and Berberich declarations.	1.20	\$ 750.00	\$ 900.00
01/24/2013	JULIN, THOMAS R	Review of orders entered by Judge Zloch referring case to mediation and setting trial instructions and preparation of correspondence to Dan Christensen regarding same.	1.00	\$ 750.00	\$ 750.00
02/04/2013	JULIN, THOMAS R	Telephone conference with Dan Christensen regarding status of the case.	0.30	\$ 750.00	\$ 225.00
02/05/2013	JULIN, THOMAS R	Conference with Dan Christensen concerning status of the case, including selection of mediator and time and place of mediation; preparation of correspondence to Carole Fernandez concerning selection of mediator.	0.60	\$ 750.00	\$ 450.00
02/06/2013	JULIN, THOMAS R	Review of correspondence from Dan Christensen (.2); and preparation of response regarding status of Bob Graham's declaration and mediation dates and correspondence (.2); preparation of further correspondence to Carole Fernandez regarding mediation (.2); preparation of instructions for Amy Vasilievich to prepare notice of selection of mediator (.2).	0.80	\$ 750.00	\$ 600.00
02/13/2013	JULIN, THOMAS R	Telephone call from Bob Graham regarding the status of his declaration and preparation of materials to send to Graham for further review (1.0); preparation of report to Dan Christensen regarding recent contact with Graham regarding declaration and inquiries to Jim Wolfe of the US Senate Intelligence Committee (.5).	1.50	\$ 750.00	\$ 1,125.00
03/04/2013	JULIN, THOMAS R	Initial drafting of motion for Vaughn index and other relief (3.7); preparation of list of pretrial deadlines for Dan Christensen(.2).	3.90	\$ 750.00	\$ 2,925.00
03/05/2013	JULIN, THOMAS R	Preparation of correspondence to Bob Graham regarding status of his declaration (.3); continued drafting of motion for Vaughn index and other relief compiling all factual assertions in declarations of al-Hijji neighbors and of Graham (4.3); preparation of declaration for Dan Christensen (2.0).	6.60	\$ 750.00	\$ 4,950.00
03/06/2013	JULIN, THOMAS R	Completion of motion for Vaughn index and other relief and proposed declaration for Dan Christensen in support of motion (4.3); telephone conference with Bob Graham regarding completion of his declaration (.3); preparation of correspondence to Christensen with case update and plan for filing of motion for Vaughn index and certain other relief (.3).	4.90	\$ 750.00	\$ 3,675.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
03/07/2013	JULIN, THOMAS R	Review of Bob Graham's proposed changes to his declaration (.3), revision of his declaration to make those changes and to add material for FBI email concerning the investigation (2.2), final proofing of declaration (.5). and preparation of correspondence to Bob Graham with revised declaration (.2).	3.20	\$ 750.00	\$ 2,400.00
03/08/2013	JULIN, THOMAS R	Final preparation of Graham declaration with exhibits (1.3); conferences and email exchanges with Dan Christensen and preparation of his final declaration with exhibits (2.6); preparation of correspondence to Carole Fernandez asking her for Vaughn index and submission of documents in camera or for position on motion to compel same (.4); preparation of correspondence to Dan Christensen regarding request to Fernandez (.2); review of response (.1);	4.60	\$ 750.00	\$ 3,450.00
03/26/2013	JULIN, THOMAS R	Preparation of correspondence to Carole Fernandez requesting information regarding status of supplemental response to FOIA request for documents.	0.50	\$ 750.00	\$ 375.00
03/28/2013	JULIN, THOMAS R	Review of supplemental response to FOIA request containing 35 documents, conference with Dan Christensen regarding same, and preparation of analysis of the documents for Christensen.	4.00	\$ 750.00	\$ 3,000.00
03/29/2013	JULIN, THOMAS R	Further review of newly-released documents and inclusion of substance of the documents in maser chronology of events and preparation of analysis of classification assertions for Christensen.	3.40	\$ 750.00	\$ 2,550.00
04/01/2013	JULIN, THOMAS R	Review of draft motion to exempt lawsuit from mediation drafted by Carole Fernandez (.2), correspondence to Dan Christensen regarding same (.3); and follow up correspondence to Carole Fernandez consenting to motion for exemption (.3).	0.80	\$ 770.00	\$ 616.00
04/05/2013	JULIN, THOMAS R	Review of FDLE records for Visio charting and archiving of Christensen emails (2.2); call from Dan Christensen (2.2); telephone conference with Dan Christensen (.5); preparation of correspondence to Dan Christensen regarding significance of the Hammoud records (.5); review of correspondence from Dan Christensen concerning Tony Summers comments (.2).	3.40	\$ 770.00	\$ 2,618.00
04/08/2013	JULIN, THOMAS R	Preparation of proposed correspondence to Carole Fernandez regarding possible existence of additional responsive records not produced and not claimed to be exempt pursuant to the Freedom of Information Act (1.5); further diagramming of relationships of primary parties in the case (1.0).	2.50	\$ 770.00	\$ 1,925.00
04/09/2013	JULIN, THOMAS R	Review of comments from Dan Christensen regarding records produced and preparation of response (.5); review of litigation deadlines and preparation of correspondence to Dan Christensen regarding deadlines (.5); preparation of analysis of FBI produced documents (1.3).	2.30	\$ 770.00	\$ 1,771.00
04/10/2013	JULIN, THOMAS R	Call from Bob Graham concerning FBI produced documents (.5); preparation of checklist for telephone conference with Carole Fernandez (.5); review of further analysis of FBI documents by Dan Christensen and preparation of response (1.2); preparation of memo to Christensen regarding schedule to be followed in the litigation (.8).	3.00	\$ 770.00	\$ 2,310.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/11/2013	JULIN, THOMAS R	Review of correspondence from Carole Fernandez regarding status of documents and preparation of response (.2); review of correspondence from Dan Christensen and preparation of response (.2); review of Christensen description of redactions in produced documents for proposed story (.3); review of further correspondence from Dan Christensen concerning question to be asked of Carole Fernandez concerning bank deposit slips (.5).	1.20	\$ 770.00	\$ 924.00
04/12/2013	JULIN, THOMAS R	Preparation of memo to John Delionado requesting assistance with expert witness regarding FBI practices and procedures.	0.50	\$ 770.00	\$ 385.00
04/18/2013	JULIN, THOMAS R	Call from Carole Fernandez regarding whether FBI has been able to locate additional records to produce, regarding 302s referenced in Sarasota 26-27, phone records, financial records, and Graham memo (.7); telephone call to Judge Zloch's chambers with Fernandez concerning mediation (.4); telephone call to Dan Christensen regarding conference with Fernandez and call to Zloch re mediation (1.2).	2.30	\$ 770.00	\$ 1,771.00
04/25/2013	JULIN, THOMAS R	Review of recent decision by Judge King in litigation in which US Navy asserted that it had conducted an adequate search for records.	1.00	\$ 770.00	\$ 770.00
05/13/2013	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen concerning status of the litigation (.5); receipt and preliminary review of government's motion for summary judgment asserting that it had conducted a good faith investigation and attempting to substantiate basis for assertion of exemptions (.6); preparation of correspondence to Christensen (.2)	1.30	\$ 770.00	\$ 1,001.00
05/15/2013	JULIN, THOMAS R	Review of materials provided by Dan Christensen concerning similar FOIA responses.	0.50	\$ 770.00	\$ 385.00
05/17/2013	ACOSTA, PATRICIA	Review and consideration of summary judgment motion and the supporting Hardy declaration.	1.20	\$ 500.00	\$ 600.00
05/17/2013	JULIN, THOMAS R	Further review of summary judgment papers and preparation of memo to Dan Christensen regarding strategy for response.	0.50	\$ 770.00	\$ 385.00
05/19/2013	JULIN, THOMAS R	Preparation of draft interrogatories to Department of Justice.	1.00	\$ 770.00	\$ 770.00
05/20/2013	JULIN, THOMAS R	Review and revision of plaintiffs' first set of interrogatories (3.3); drafting of first request for production of documents (.5).	3.80	\$ 770.00	\$ 2,926.00
05/21/2013	JULIN, THOMAS R	Research regarding Freedom of Information Act appeals, including review of Rosenfeld v. US Department of Justice series of cases and initial drafting of appeal from decision reflected in March 28, 2013, document release (7.1); review of materials provided to Christensen from Mark Carmanica at Reporters' Committee for Freedom of the Press (.5).	7.60	\$ 770.00	\$ 5,852.00
05/23/2013	JULIN, THOMAS R	Analysis of classification of documents released 3-28-2013 and research regarding prior Hardy declaration cases.	3.50	\$ 770.00	\$ 2,695.00
05/24/2013	ACOSTA, PATRICIA	Review and comment on appeal of the decisions made by the FBI in connection with the March 29 letter and facilitate filing of the appeal; review and comment on request for interrogatories to the FBI.	2.00	\$ 500.00	\$ 1,000.00
05/24/2013	JULIN, THOMAS R	Completion of draft appeal from March 28, 2013 DOJ decision to release some documents but assert exemptions for other documents (4.0); review and revision of appeal letter (2.4); review of recent production of documents from FDLE (.5); initial drafting of response in opposition to motion for summary judgment (1.5).	8.40	\$ 770.00	\$ 6,468.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
05/27/2013	JULIN, THOMAS R	Review and revision of D. Robert Graham declaration in light of DOJ release of documents on March 28, 2013, and preparation of correspondence to Graham requesting review of same (3.8); review and revision of Christensen declaration and preparation of correspondence to Christensen requesting review of same (1.2).	5.00	\$ 770.00	\$ 3,850.00
05/28/2013	JULIN, THOMAS R	Telephone call from Bob Graham with preliminary suggested revisions to his declaration (.5); continued drafting of response to statement of undisputed facts and motion for summary judgment, including review of all Rosenfeld cases (3.3).	3.80	\$ 770.00	\$ 2,926.00
05/29/2013	JULIN, THOMAS R	Further conference with Bob Graham regarding revision of declaration and logistic for completion (.8); conference with Dan Christensen regarding completion of summary judgment opposition (.4); continued drafting of summary judgment opposition and response to defendants' statement of undisputed material facts requiring summary judgment (5.2).	6.40	\$ 770.00	\$ 4,928.00
05/30/2013	JULIN, THOMAS R	Completion of review draft for client of response to statement of undisputed facts and response in opposition to summary judgment.	7.30	\$ 770.00	\$ 5,621.00
05/31/2013	ACOSTA, PATRICIA	Evaluate draft of summary judgment motion and J. Scheinlin's opinion regarding sufficiency of search; prepare insert regarding failure of the Hardy declaration to provide search terms.	2.50	\$ 500.00	\$ 1,250.00
05/31/2013	JULIN, THOMAS R	Completion of response to motion for summary judgment, including opposition to statement of facts and completion of declarations of D. Robert Graham and Dan Christensen (6.1); preparation of motion to strike and motion for Vaughn index and in camerainspection of documents (2.9).	9.00	\$ 770.00	\$ 6,930.00
06/13/2013	JULIN, THOMAS R	Memorandum to Carole Fernandez proposing meeting to prepare pretrial stipulation and review of response.	0.30	\$ 770.00	\$ 231.00
06/17/2013	JULIN, THOMAS R	Initial drafting of pretrial stipulation.	5.50	\$ 770.00	\$ 4,235.00
06/18/2013	JULIN, THOMAS R	Receipt and review of government's response to motion to strike David M. Hardy declaration and preparation of correspondence to client regarding same (.7); completion of initial draft of pretrial stipulation (6.5); preparation of correspondence to Carole M. Fernandez with draft pretrial stipulation (.3).	7.50	\$ 770.00	\$ 5,775.00
06/19/2013	JULIN, THOMAS R	Receipt and review of US Department of Justice request for consent to motion for protective order concerning discovery and preparation of response (.2); telephone call from Bob Graham regarding President's request for his assistance to increase transparency of US government surveillance programs and regarding his availability for trial (.8).	1.00	\$ 770.00	\$ 770.00
06/20/2013	JULIN, THOMAS R	Preparation of memorandum regarding trial strategy (.8); preparation of memorandum regarding defendants' motion for protective order (.3).	1.10	\$ 770.00	\$ 847.00
06/25/2013	JULIN, THOMAS R	Review of Department of Justice proposed changes to pretrial stipulation, preparation of revised stipulation incorporating changes, and preparation of exhibits that DOJ had not previously reviewed.	4.20	\$ 770.00	\$ 3,234.00
06/26/2013	JULIN, THOMAS R	Review of additional requested changes and preparation of further revision (1.5); preparation of plaintiffs' reply to response to motion to strike David M. Hardy declaration (4.6); preparation of plaintiffs' reply to defendants' responses to motion for Vaughn index (2.8).	8.90	\$ 770.00	\$ 6,853.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
07/01/2013	JULIN, THOMAS R	Research regarding recoverability of attorneys' fees in FOIA enforcement action when documents are produced prior to entry of judicial determination of issues raised by complaint.	1.50	\$ 770.00	\$ 1,155.00
07/05/2013	JULIN, THOMAS R	Initial drafting of response to Department of Justice Motion for a Protective Order to relieve it of any obligation to respond to interrogatories or request for production of documents (3.5); research regarding FBI's Central Records System and statement of Glenn A. Fine criticizing adequacy of the system to locate documents responsive to requests (1.5).	5.00	\$ 770.00	\$ 3,850.00
07/06/2013	JULIN, THOMAS R	Completion and filing of response to motion for protective order.	3.20	\$ 770.00	\$ 2,464.00
07/08/2013	JULIN, THOMAS R	Initial drafting of proposed finding of fact and conclusions of law for submission at Friday pretrial conference.	1.50	\$ 770.00	\$ 1,155.00
07/09/2013	JULIN, THOMAS R	Drafting of proposed findings of fact and conclusions of law for pretrial conference (7.2); correspondence to Dan Christensen regarding status of the case and pretrial conference (.3); correspondence to Christensen regarding pretrial stipulation and other recent filings (.2).	7.70	\$ 770.00	\$ 5,929.00
07/10/2013	JULIN, THOMAS R	Completion of proposed findings of fact and conclusions of law and circulation to client and Patricia Acosta for final review before submission.	3.50	\$ 770.00	\$ 2,695.00
07/11/2013	JULIN, THOMAS R	Preparation of pretrial conference materials and preparation for argument on all pending motions including motion for summary judgment, motion to strike David Hardy declaration, defense motion for protective order, motion for Vaughn index, and motion for extension of time to file answer.	7.80	\$ 770.00	\$ 6,006.00
07/12/2013	JULIN, THOMAS R	Travel to Fort Lauderdale for pretrial conference (1.0); final preparation for status conference while waiting for conference to begin (.9); participation in pretrial conference (.5); conference with client after pretrial conference (.4); return to Miami from Fort Lauderdale (.9); report on conference to team (.4); telephone calls from Bob Graham regarding identity of FBI special agent who provided FBI documents in meeting with Sean Joyce and regarding pretrial conference and procedures for searching for additional documents (.7); telephone calls to various experts regarding search protocols that likely would result in production of additional FBI records and preparation of memos from calls (3.8).	8.60	\$ 770.00	\$ 6,622.00
07/15/2013	JULIN, THOMAS R	Telephone conference with Bob Graham regarding status of the case (.3); review of correspondence from Debbie Novy regarding her database research recommendations (.2); review of Bob Graham's Miami Herald article regarding lying of government officials to the public (.2).	0.70	\$ 770.00	\$ 539.00
07/16/2013	ACOSTA, PATRICIA	Consideration of Hardy declaration and court order and prepare proposed search terms in accordance with the judge's ruling	2.50	\$ 500.00	\$ 1,250.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
07/16/2013	JULIN, THOMAS R	Call from Eleanor Hill at King & Spalding regarding FBI databases and cooperation with congressional investigations (.4).; conference with Deby Novy concerning database searching (.2); research regarding online sources of FBI database information (.5); review of DOJ FOIA Guide to exemptions 6 and 7(C) (.4); review of Christensen suggestions for search instructions (.2); call from Bob Graham regarding Peter Wallsten at The Washington Post and call from Peter Wallsten regarding status of the case(1.5); correspondence to Dan Christensen with orders from judge Zloch directing filings to be made concerning search method and extending time for DOJ to answer the complaint (.5); preparation of correspondence to Peter Wallsten at The Washington Post (.2); correspondence with Bob Graham regarding call from Wallsten (.2); review of Acosta recommendations for additional searches (.2).	4.10	\$ 770.00	\$ 3,157.00
07/17/2013	JULIN, THOMAS R	Review of question from Kel McClanahan regarding September 16, 2002 document and preparation of response (.3); initial drafting of proposed additional search instructions (7.1); review of suggestions from Kel McClannahan and preparation of response (.3).	7.70	\$ 770.00	\$ 5,929.00
07/18/2013	JULIN, THOMAS R	Continued drafting of proposed instructions for further FBI search for documents, including graphic analysis of FBI records released on March 28, 2013 (4.5); review of OIG Report to Congress concerning FBI Sentinel System (.3); correspondence with Kel McClanahan regarding Sentinel system, (.3); correspondence with Dan Christensen regarding completed proposed search (.1).	5.20	\$ 770.00	\$ 4,004.00
07/19/2013	JULIN, THOMAS R	Completion of motion for additional search and filing of same.	2.50	\$ 770.00	\$ 1,925.00
07/23/2013	JULIN, THOMAS R	Review of correspondence from DOJ regarding closing of appeal from March 28, 2013 decisions and preparation of correspondence to Dan Christensen regarding same.	0.80	\$ 770.00	\$ 616.00
07/29/2013	JULIN, THOMAS R	Telephone call from Bob Graham regarding status of the case and motion to compel additional search and preparation of correspondence to him with requested motion; preparation of correspondence to Dan Christensen with update concerning status of the case.	1.00	\$ 770.00	\$ 770.00
08/07/2013	JULIN, THOMAS R	Receipt and preliminary review of FBI opposition to motion to compel additional search for responsive documents and preparation of correspondence to client and others regarding same.	1.00	\$ 770.00	\$ 770.00
08/08/2013	JULIN, THOMAS R	Conference with Dan Christensen regarding FBI response and preparation of correspondence to Bob Graham regarding same.	1.50	\$ 770.00	\$ 1,155.00
08/10/2013	JULIN, THOMAS R	Drafting of reply to response to motion to compel additional search for documents.	3.50	\$ 770.00	\$ 2,695.00
08/11/2013	JULIN, THOMAS R	Continued drafting of reply to response to motion to compel; telephone conference with Bob Graham; preparation of correspondence to client regarding same.	3.50	\$ 770.00	\$ 2,695.00
08/12/2013	JULIN, THOMAS R	Review of client comments on draft reply to response to motion to require additional search for documents and revision of same.	1.50	\$ 770.00	\$ 1,155.00
08/13/2013	JULIN, THOMAS R	Review of Hijackers Timeline and other documents for references to Tampa involvement in PENTTBOMB investigation and further revision of reply memorandum.	1.70	\$ 770.00	\$ 1,309.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
08/14/2013	JULIN, THOMAS R	Completion of reply to response to motion for additional search (2.0); preparation of correction to reply (.5); call from lawyer in Minnesota who has been following the case due to handling of class action involving pipeline in Afghanistan (.5); research regarding information provided by lawyer concerning Richard Clarke's contention that CIA knew of network of Saudi's in the US helping al-Qaeda before 9/11 but did not reveal the network to the FBI because they wanted to flip the operatives and turn them into CIA sources and concern that FBI would mishandle the matter (1.2); review of Christensen article concerning government response in opposition to further search and reply and preparation of recommended changes to article (.4); correspondence with Richard Hennessey (lawyer from Minnesota (.2); correspondence to Kel McClanahan (.3).	5.10	\$ 770.00	\$ 3,927.00
08/19/2013	JULIN, THOMAS R	Memo to Bob Graham regarding status of the case.	0.40	\$ 770.00	\$ 308.00
08/26/2013	JULIN, THOMAS R	Telephone call from Carol Jean LoCicero regarding possible intervention of Sarasota Herald Tribune in litigation and request for update and materials (1.5); conference call with Dan Christensen regarding request.	2.00	\$ 770.00	\$ 1,540.00
08/28/2013	JULIN, THOMAS R	Further correspondence with Carol LoCicero concerning possible intervention.	0.30	\$ 770.00	\$ 231.00
09/04/2013	JULIN, THOMAS R	Review of Sarasota Herald Tribune motion to intervene (.2); correspondence to Carol LoCicero regarding same and suggesting that it be amended to allow other media to participate on the brief (.3); preparation of correspondence to Dan Christensen regarding motion to intervene (.2).	0.70	\$ 770.00	\$ 539.00
09/06/2013	JULIN, THOMAS R	Telephone call from Dan Christensen regarding Summers conversation with Bob Graham in Ireland concerning FBI confrontation of Graham at airport and preparation of response regarding possibility that confrontation took place at Dulles on day after meeting with Sean Joyce.	0.50	\$ 770.00	\$ 385.00
09/17/2013	JULIN, THOMAS R	Preparation of materials for call from Casey Frank concerning Miami Herald joinder in lawsuit through intervention (.5); call from Frank regarding same (.5); call to Dan Christensen regarding probable Miami Herald intervention (.5).	1.50	\$ 770.00	\$ 1,155.00
09/19/2013	JULIN, THOMAS R	Review of government opposition to motion to intervene and preparation of correspondence to client regarding same.	0.50	\$ 770.00	\$ 385.00
09/23/2013	DREIER, DOUGLAS C	Meeting with Tom Julin to bring up to speed on developments in the case	0.40	\$ 265.00	\$ 106.00
09/23/2013	DREIER, DOUGLAS C	Analysis of court filings (motion for order compelling additional search and subsequent related filings) to bring up to speed on developments in the case	0.50	\$ 265.00	\$ 132.50
10/02/2013	JULIN, THOMAS R	Telephone call from Dan Christensen regarding 9/11 families and memo from then and preparation of correspondence to Carol LoCicero advising her of gratitude of 9/11 families for Herald Tribune participation in the litigation (1.0); telephone call from Mike Pollick regarding further report on the litigation (.5).	1.50	\$ 770.00	\$ 1,155.00
10/09/2013	JULIN, THOMAS R	Review of Department of Justice opposition to Miami Herald motion to intervene and preparation of correspondence to Dan Christensen regarding the same.	0.30	\$ 770.00	\$ 231.00
10/10/2013	JULIN, THOMAS R	Preparation of correspondence to Dan Christensen regarding participation of Tampa Bay Times in litigation.	0.30	\$ 770.00	\$ 231.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
10/25/2013	JULIN, THOMAS R	Review of opinion on reconsideration in Truthout v. US Department of Justice referencing David M. Hardy declaration and review of arguments filed in that case regarding Hardy declaration filed in Broward Bulldog litigation.	1.50	\$ 770.00	\$ 1,155.00
12/01/2013	JULIN, THOMAS R	Review of notice of appearance filed by Dexter Lee, research regarding background of Dexter Lee, preparation of correspondence to client regarding appearance of Dexter Lee and lack of any other movement in the litigation.	0.40	\$ 770.00	\$ 308.00
12/02/2013	ACOSTA, PATRICIA	Evaluate notice of appearance of substitute counsel for the United States and case strategy.	0.80	\$ 500.00	\$ 400.00
12/03/2013	JULIN, THOMAS R	Review of question from client regarding Dexter Lee and preparation of response with background on FOIA litigation handled by Lee (.3); research concerning recoverability of attorneys' fees in litigation that results in production of records not pursuant to court order (2.3); research regarding mandatory declassification review deadlines (1.0)	3.60	\$ 770.00	\$ 2,772.00
03/19/2014	JULIN, THOMAS R	Review of order from Judge Zloch granting leave for The Miami Herald and Sarasota Herald Tribune to file amicus curiae brief and preparation of correspondence to client regarding same.	0.50	\$ 770.00	\$ 385.00
03/21/2014	JULIN, THOMAS R	Review of correspondence regarding Philadelphia Inquirer interest in intervening in FOIA action; memo to Carol LoCicero regarding same; telephone call from Chris Mondics, business editor at The Inquirer regarding interest in the litigation and further correspondence to LoCicero regarding same.	1.20	\$ 770.00	\$ 924.00
03/31/2014	JULIN, THOMAS R	Telephone call from Sarasota- Herald Tribune reporter Michael Pollick regarding order entered by Judge Zloch compelling Justice Department to do better search (.2); receipt and review of order; (.3); preparation of correspondence to client regarding significance of the order (.4); correspondence with Carol LoCicero regarding order (.2); review of Broward Bulldog story regarding decision of Judge Zloch to order FBI to conduct a more thorough search (.3).	1.10	\$ 770.00	\$ 847.00
04/02/2014	JULIN, THOMAS R	Travel to Miami Lakes and meeting with Bob Graham and Dan Christensen updating them on the status of the litigation and significance of order compelling additional search for responsive documents and return to Miami.	4.00	\$ 795.00	\$ 3,180.00
04/04/2014	JULIN, THOMAS R	Telephone call from Michael Pollick regarding Judge Zloch's order compelling additional searches (.5); telephone call to Dan Christensen regarding judge's order compelling additional searches (.5).	1.00	\$ 795.00	\$ 795.00
04/05/2014	JULIN, THOMAS R	Review of correspondence from Carol LoCicero regarding order and preparation of response (.3); preparation of correspondence to Bob Graham regarding Judge Zloch's order compelling FBI to conduct a more thorough search (.3); review of Christensen report regarding Judge Zloch's order and preparation of suggestions regarding same (.4).	1.00	\$ 795.00	\$ 795.00
04/16/2014	JULIN, THOMAS R	Review of request from Dexter Lee to agreement to motion for enlargement of time to provide documents to the court and preparation of response indicating agreement to motion (.3); call to Dan Christensen regarding request (.3); preparation of correspondence to Dan Christensen regarding request (.2).	0.80	\$ 795.00	\$ 636.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/17/2014	LIMA, PAULO R	Reviewed April 4 order of the Court and Defendant's Motion for Reconsideration and supporting papers. Strategic discussion with T. Julin and the client regarding planned response to Plaintiff's motion.	4.30	\$ 510.00	\$ 2,193.00
04/18/2014	JULIN, THOMAS R	Review of order on motion for enlargement of time and for partial reconsideration of order compelling additional search for responsive documents (.4); call to court regarding scanning issue (.1); call to client regarding significance or order on denial of reconsideration (.3); call from Robert Hennessey regarding the litigation and potential significance of rulings to lawsuit by 9/11 victims against Kingdom of Saudi Arabia (.3); review of government's notice of filing classified documents for in camera review and conference with client regarding same (.3); preparation of outline of correspondence to Dexter Lee regarding implementation of court order compelling further search for responsive documents (.4); analysis of Zloch order compelling production and whether correspondence with Justice Department is needed (1.5); review of draft report regarding order denying motion for reconsideration of order (.3).	3.60	\$ 795.00	\$ 2,862.00
04/18/2014	LIMA, PAULO R	Research and drafting opposition to Plaintiff's motion for reconsideration of DE 60 (4.25 hours). Reviewed case file, prepared summary of documents to be produced pursuant to the Court's order and discussed strategy with T. Julin (2.75 hours). Drafted letter to opposing counsel regarding 27 classified pages filed today for the Court's in camera review (1 hour).	8.00	\$ 510.00	\$ 4,080.00
04/23/2014	JULIN, THOMAS R	Conference with Steve Meyer regarding status of the request and preparation of response with Judge Zloch's orders for further analysis.	0.50	\$ 795.00	\$ 397.50
04/28/2014	JULIN, THOMAS R	Preparation of correspondence to Dexter Lee requesting confirmation that documents have been delivered to Judge Zloch pursuant to prior order (.3); preparation of correspondence to client regarding status of the case (.2).	0.50	\$ 795.00	\$ 397.50
04/29/2014	JULIN, THOMAS R	Memo to client regarding lack of response from Dexter lee for request for information concerning compliance with court order.	0.30	\$ 795.00	\$ 238.50
04/30/2014	JULIN, THOMAS R	Review of correspondence from Dexter Lee indicating receipt of 27 boxes of classified documents and difficulties that the Justice Department had in delivering the boxes to Judge Zloch in light of the lack of a secure facility for classified documents (.3); preparation of correspondence to client regarding Lee correspondence (.2); conference with client regarding noncompliance with prior order and significance of discovery of additional documents of classified documents (.4); review of draft concerning the matter and conference with client (.5); telephone calls from other press regarding same (.4); preparation of correspondence to Dexter Lee requesting explanation regarding additional four boxes and information regarding number of classified documents produced and responsiveness of previously produced documents (.5); conference with Terry Connor regarding procedures used to obtain lawyer clearance to review classified documents (.5); research regarding clearance procedures used in Guantanamo detainee cases (1.5).	4.30	\$ 795.00	\$ 3,418.50

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/30/2014	LIMA, PAULO R	Reviewed email from government discussing production of documents to the Court for in-camera review and discussed same with T. Julin. (.5 hours). Researched caselaw regarding challenging classification decisions, including potential for counsel to obtain security clearance to review documents.	4.80	\$ 510.00	\$ 2,448.00
05/01/2014	JULIN, THOMAS R	Review of comments by Steve Meyers regarding displayed text versus copied text from OCR documents and preparation of correspondence to Paulo Lima regarding same (.5); review of client request for recommendation regarding objections to proposed government procedure for judicial review of documents produced in camera and preparation of recommendation against further immediate action (.5).	1.00	\$ 795.00	\$ 795.00
05/01/2014	JULIN, THOMAS R	Review of government notice of filing and preparation of correspondence to client regarding same.	0.30	\$ 795.00	\$ 238.50
05/05/2014	LIMA, PAULO R	Strategic discussion with T. Julin regarding next steps, including potential to move for access to classified documents.	1.00	\$ 510.00	\$ 510.00
05/09/2014	JULIN, THOMAS R	Review of DOJ notice of filing third declaration of David Hardy and disclosure of additional documents (.6); preparation of correspondence to client regarding recent filing and conference with client (.5); prepublication review of article regarding release of four additional pages and correspondence to Dan Christensen regarding same (.5).	1.60	\$ 795.00	\$ 1,272.00
05/09/2014	LIMA, PAULO R	Review and analysis of the Third Hardy Declaration and four pages of newly-released documents. Call with client to discuss same.	2.00	\$ 510.00	\$ 1,020.00
05/13/2014	JULIN, THOMAS R	Review of appeal of US Department of Justice release of four additional pages and editing of same to include material concerning significance of the requested records to family members of the 9/11 victims (1.5); review and editing of Dan Christensen article regarding investments of the governor and first lady in order to conceal assets (3.5).	5.00	\$ 795.00	\$ 3,975.00
05/17/2014	JULIN, THOMAS R	Review of correspondence from Dan Christensen regarding receipt of four additional pages from Justice Department (.2); preparation of correspondence to Dan Christensen regarding submission of appeal of DOJ withholding of information in the four pages (.2); review of Sarasota Herald Tribune reporting on the case (.3).	0.70	\$ 795.00	\$ 556.50
06/05/2014	JULIN, THOMAS R	Review of correspondence from Dan Christensen concerning deadline for submission by FBI of report to the court regarding results of manual review of 80,000 pages of documents and preparation of response to him explaining status of the obligation to report.	0.60	\$ 795.00	\$ 477.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
06/06/2014	JULIN, THOMAS R	Receipt and review of FBI and Justice Department report to the Court regarding results of additional search and Fourth Declaration of David M. Hardy regarding search methodology and results and referencing the filing of a fifth declaration on an ex parte and in camera basis (1.5); conference with Dan Christensen regarding the filing and strategy for moving forward (.5); review of draft article by Dan Christensen concerning significance of FBI failure to locate documents responsive to his request and preparation of comments on same (.5); preparation of materials for Dan Christensen regarding provisions of FOIA that allow FBI to treat documents as though they do not exist (.3); review of correspondence from client asking whether FBI had been ordered to contact Sheffield and Jacqueline Maguire and preparation of response showing this had been requested but not ordered (.3).	3.10	\$ 795.00	\$ 2,464.50
06/06/2014	LIMA, PAULO R	Review and analysis of Fourth Hardy Declaration (1 hour.) Call with client re: government's filing. (.75 hours). Discussion with T. Julin regarding strategy for proceeding with the case (.75 hours).	2.50	\$ 510.00	\$ 1,275.00
06/09/2014	JULIN, THOMAS R	Review of client notation of case in which court had concluded that FBI may not mislead the court even if it has statutory authority to treat documents as though they are not subject to FOIA requirements .	0.50	\$ 795.00	\$ 397.50
08/13/2014	JULIN, THOMAS R	Telephone call from Bob Graham regarding status of the FOIA case.	0.50	\$ 795.00	\$ 397.50
04/03/2015	JULIN, THOMAS R	Preparation of proposed correspondence to Dexter Lee requesting agreement to deposition of agent who authorized key document and other discovery relation to 9-11 Review Commission report and preparation of correspondence to Dan Christensen requesting his review of same (1.5); review of Christensen response (.1); transmittal of correspondence to Dexter Less (.1); transmittal of confirming email to Christensen (.1).	1.80	\$ 820.00	\$ 1,476.00
04/04/2015	JULIN, THOMAS R	Review of response from Dexter Lee and preparation of response and notification of client regarding same (.2); preparation of additional request to Dexter Lee (.2).	0.40	\$ 820.00	\$ 328.00
04/06/2015	JULIN, THOMAS R	Review of correspondence from Dan Christensen regarding Review Commission report and preparation of response to him regarding inadequacies of the report to critique FBI efforts to implement suggested changes or evidence subsequently called to its attention.	0.50	\$ 820.00	\$ 410.00
04/09/2015	JULIN, THOMAS R	Receipt and review of Dexter Lee response to request for agreement to discovery in light of 9-11 Review Commission Report and preparation of correspondence to client regarding same.	0.30	\$ 820.00	\$ 246.00
04/20/2015	JULIN, THOMAS R	Drafting of request for status conference (3.6); preparation of request to Dexter Lee for agreement to request (.5).	4.10	\$ 820.00	\$ 3,362.00
04/21/2015	JULIN, THOMAS R	Initial drafting of request for status conference regarding (1) status of court review of documents, (2) recent developments in the case, (3) whether discovery will be allowed, and (4) setting the case for trial.	4.00	\$ 820.00	\$ 3,280.00
04/21/2015	LIMA, PAULO R	Reviewed and made suggested revisions to Plaintiff's Motion for Status Conference.	2.50	\$ 535.00	\$ 1,337.50
04/22/2015	JULIN, THOMAS R	Continued drafting of request for status conference and assembly of supporting materials	3.50	\$ 820.00	\$ 2,870.00

Exhibit C to Declaration of Thomas R. Julin - Chronological Sort

Date	TKPR Name	Narrative	Hours	Rate	Fees
04/23/2015	JULIN, THOMAS R	Completion of request for status conference regarding court review of records submitted in camera and to review whether discovery would be permitted to a limited extent.	1.20	\$ 820.00	\$ 984.00
05/07/2015	JULIN, THOMAS R	Review of correspondence from Dan Christensen (.5); review of request from Bob Graham regarding status of the case (.3); preparation of responses to Christensen and Graham regarding status of request for status conference and opportunity to depose witness (.2).	1.00	\$ 820.00	\$ 820.00
05/11/2015	JULIN, THOMAS R	Receipt and review of defendants' response to request for status conference and preparation of correspondence to client regarding same.	1.00	\$ 820.00	\$ 820.00
05/19/2015	JULIN, THOMAS R	Drafting of proposed reply to response to request for status conference (1.5); call from Dan Christensen regarding status of the case (.5).	2.00	\$ 820.00	\$ 1,640.00
08/03/2015	JULIN, THOMAS R	Telephone call from Dan Christensen regarding status of the FOIA case.	0.20	\$ 820.00	\$ 164.00
09/28/2015	DREIER, DOUGLAS C	Legal research into FOIA Exemption 6	0.50	\$ 345.00	\$ 172.50
			615.35	\$ 666.16	\$ 409,919.25