

EXHIBIT A- Computation of Attorney's Fees

Lori K. Bell

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
12/14/2023	0.40	Confer with Ms. Castner regarding new claim and investigation strategy.
12/19/2023	0.30	Analysis of pleadings and orders submitted by Plaintiff and Court to assess status of case.
12/19/2023	0.40	Consider scope of plaintiff's prior and pending claims to determine strategy for researching resulting lawsuits.
12/19/2023	0.40	Examination of other lawsuits and charges against Mr. Montgomery located in Court website and determine cases to recommend to client to obtain.
12/21/2023	0.70	Examination of register of actions for district court, Court of Appeals and Colorado Supreme Court to determine potentially relevant cases to obtain.
12/21/2023	0.20	Receipt and analysis of documents from client pertaining to employees working on date of incident.
12/29/2023	0.20	Correspond with Ms. Castner regarding the status of the case.
01/02/2024	0.30	Receipt and analysis of claim notes pertaining to investigation.
01/02/2024	1.20	Examination of background search results by Best Buy and determine further investigation and follow up to conduct.
01/02/2024	0.80	Examination and analysis of internal investigation of plaintiff's history of lawsuits.
01/23/2024	0.20	Correspond with Ms. Castner regarding the status of the case.
01/23/2024	0.20	Receipt of documents evidencing service of process on Best Buy and confirm sufficiency of the same.
01/24/2024	0.50	Consider status of ongoing investigation and positive results and utilization of the same in defense of case.
02/02/2024	0.30	Finalize Answer to Plaintiff's Complaint.
02/02/2024	0.30	Consider scope of court order to attach to Best Buy's answer to complaint in support of its affirmative defenses.
02/09/2024	0.20	Receipt of delay prevention order from client and confirm status of the same on the court's docket.
02/20/2024	0.30	Confer with Plaintiff regarding claims and defenses and preparation of the case management order.
02/21/2024	1.00	Consider representations from Plaintiff during Rule 16 conferral and consider potential counterclaims and additional defenses and investigation.
02/26/2024	0.30	Confer with Ms. Morschen to plan strategy for case handling.
02/26/2024	0.20	Consider action to take in response to court's delay prevention order.
02/28/2024	0.80	Work on and expand initial case evaluation to clients.
03/10/2024	0.40	Finalize Best Buy's Rule 26 Initial Disclosures and Privilege Log.
03/10/2024	0.20	Consider plaintiff's identification of Best Buy in complaint and civil cover sheet and confirm accuracy thereof with client.

03/28/2024	0.30	Consider statements by plaintiff during scheduling conference and whether the same constitute admissions for which the transcript should be requested.
03/29/2024	0.30	Consideration of plaintiff's proposed additions to the case management order and determine further modifications to Defendant's statement.
04/22/2024	0.60	Analysis of video of plaintiff's interaction with Best Buy employees in consideration of scope of detention and protection by shopkeeper's act.
04/22/2024	0.20	Receive and consider mandates by Court in regard to case procedures.
04/23/2024	0.20	Consider whether substantive Rule 26 disclosures can be made at this time.
05/07/2024	0.30	Consider alternative avenues to identify and locate Best Buy employees who confronted the plaintiff.
05/07/2024	0.40	Consider scope of testimony and evidence necessary to support a motion for summary judgment.
05/08/2024	0.40	Analysis of plaintiff's current online presence on social media and YouTube.
05/08/2024	0.80	Receipt and analysis of additional motions for summary judgment and corresponding orders in cases initial by plaintiff in consideration of burden to which Judges holding plaintiff as a pro se litigant.
05/09/2024	1.00	Examination of elements of a claim for defamation and determine evidence necessary to establish the same to incorporate into a motion for summary judgment.
05/09/2024	0.80	Analysis of the elements of a civil assault claim necessary to establish a claim to use in motion for summary judgment on false imprisonment.
05/09/2024	1.30	Examination of case law to determine elements of false imprisonment necessary to establish a claim and to support motion for summary judgment on the issue.
05/09/2024	1.40	Begin preparing legal standard section for motion for summary judgment on each of plaintiff's claims for relief.
05/15/2024	0.20	Confer with plaintiff regarding amended case management order to reflect new trial.
05/28/2024	0.20	Consider correspondence from Khay regarding identification of former employees involved in the incident.
05/28/2024	0.60	Conference call and interview of Mahmoud Abu Shaweesh regarding his involvement and recollection of the alleged incident.
05/28/2024	0.50	Confer with Mr. Rusch regarding his recollection of Plaintiff and the alleged incident.
05/28/2024	0.30	Consider further investigation following employee interviews.
05/28/2024	0.20	Correspond with Khay regarding ongoing investigation.
05/29/2024	0.20	Correspond with Khay regarding ongoing investigation.
06/04/2024	0.20	Consider correspondence from clients regarding explanation of ongoing investigation efforts.
06/11/2024	0.30	Examination of Court docket to determine status of rulings on procedural and substantive issues necessary to move case forward.

06/13/2024	2.40	Analysis and consideration following original CMR and provided updated CMR to address investigation, case status and evaluation of liability and damages.
06/14/2024	0.20	Receive and consider court order regarding trial date and case management modifications.
06/20/2024	0.20	Confer with pro se Plaintiff Montgomery regarding amendments to the case management order.
07/15/2024	0.30	Assess impending deadlines for experts and dispositive motions in advance of hearing to continue trial and consider whether to comply with deadlines prior to conference.
07/16/2024	0.20	Correspond with Khay regarding case progress with discovery, dispositive motions and upcoming hearing with the court.
07/22/2024	1.80	Expand legal standard section of motion for summary judgment to address statutes and case law analysis for plaintiff's three claims for relief against Best Buy.
07/22/2024	1.00	Examination of State Court orders granting motions for summary judgment as to Mr. Montgomery's claims to determine Orders to include as exhibits to instant motion for summary judgment.
07/22/2024	0.50	Consider means of supporting undisputed facts section of motion and whether to rely on statements by plaintiff or to obtain an affidavit from the Best Buy employees.
07/22/2024	0.80	Modify undisputed facts section of motion for summary judgment to tie facts to details of plaintiff's body cam video.
07/22/2024	1.00	Modify and finalize motion for summary judgment in advance filing.
07/23/2024	1.50	Analysis of plaintiff's YouTube videos describing planned stings on retailers to identify video to identify in motion for summary judgment.
07/23/2024	1.00	Assess appellate court orders affirming district courts' dismissal of plaintiff's claims to incorporate the same into motion for summary judgment.
07/23/2024	0.40	Confer with Plaintiff regarding forthcoming motion to dismiss and plaintiff's planned motion to dismiss Best Buy's shopkeeper's privilege defense.
07/24/2024	0.40	Analysis of plaintiff's responses to written discovery and consider means of using in support of motion for summary judgment.
07/24/2024	0.80	Examination and analysis of Federal court orders regarding plaintiff's similar claims against large retailers.
08/01/2024	0.30	Consider plaintiff's motion to expand plaintiffs' deadline to respond to motion for summary judgment and submit his own motion and whether to respond to the same.
08/12/2024	0.30	Receipt of correspondence from Plaintiff regarding and proposing modification of the case management order to address expanded motions timelines and respond with compromise to Plaintiff's proposal.
08/12/2024	0.20	Further conferral with Plaintiff regarding his alleged impediments to timely submitting a motion for summary judgment and response to Best Buy's motion.

08/12/2024	0.20	Consider correspondence from Khay regarding case status and advise pending MSJ and resulting issues and new trial date and amended case management order.
08/12/2024	0.20	Analysis of prior CMR and consider case activity requiring updated report.
08/12/2024	0.20	Ongoing conferral with Plaintiff regarding forthcoming and pending motions and details of amended CMO.
08/14/2024	0.50	Prepare updated CMR report to client.
08/14/2024	0.30	Confer with Mr. Montgomery regarding outstanding discovery requests from Best Buy and his basis for delaying and objecting to responses.
08/14/2024	0.40	Receive and consider call from plaintiff regarding forthcoming arguments in favor of his motion for summary judgment and alleged facts supporting his motion.
08/21/2024	0.20	Consider implications or Court order regarding plaintiff's alleged medical conditions necessitating expanded time to deal with lawsuit.
09/11/2024	0.20	Correspond with Khay regarding case status and mediation potential.
09/11/2024	0.30	Correspond with Sedgwick about our motion for summary judgment and settlement negotiation strategy.
09/12/2024	0.20	Correspond with Khay regarding pros and cons to mediation.
09/12/2024	0.20	Receive follow up correspondence from plaintiff confirming lack of interest in mediation and advise Khay of the same.
09/12/2024	0.20	Confer with plaintiff regarding ADR Order and mediation.
09/16/2024	0.10	Correspond with Khay regarding ADR Order and plaintiff's position on the same.
09/17/2024	0.20	Confer with Plaintiff regarding his motion for summary judgment and scope of response to our motion.
09/19/2024	0.30	Confer with plaintiff regarding his forthcoming motion for summary judgment including exhibits for which he wishes to confer.
09/20/2024	0.30	Confer with plaintiff regarding forthcoming motion and response and his explanation for filings and arguments made therein.
09/23/2024	1.90	Examination of plaintiff's 30-page response to motion for summary judgment and attached affidavits, exhibits and transcriptions in consideration of strategy for responding thereto.
09/23/2024	1.30	Examination of Plaintiff's motion for summary judgment to determine means of refocusing the issues.
09/23/2024	0.30	Consider plaintiff's conflicting responses to written discovery and self serving MSJ affidavit to use in support of response and reply to pending MSJs.
09/23/2024	0.40	Consider facts incident recalled by Best Buy employees and consider having employees provide an affidavit detailing encounter.
09/26/2024	0.30	Correspond with Khay regarding status of mediation and motions for summary judgment.
09/26/2024	3.30	Examination of receipts of plaintiff's purchases and returns around the date in question and create chronology and map of purchases and returns throughout the Denver metro area and how to present the same in Best Buy's defense.

09/27/2024	0.20	Exchange correspondence with Khay regarding investigation into plaintiff's activities on day of encounter and subsequent days.
09/27/2024	2.00	Examination of cases cited by plaintiff in his motion for summary judgment to determine scope of response to legal arguments.
09/27/2024	0.20	Correspond with Best Buy employees regarding the need for an affidavit to support motion for summary judgment.
09/30/2024	0.40	Analyze Plaintiff's assertions in his motion for summary judgment.
10/03/2024	0.40	Receipt and analysis of additional social media and online postings by Plaintiff documenting his plans to sue for alleged violations.
10/03/2024	0.20	Confer with Plaintiff regarding modification of briefing schedule for summary judgment motions.
10/03/2024	0.70	Conference call with clients to discuss case strategy.
10/03/2024	0.40	Analysis of Plaintiff's you tube video regarding stings in consideration of the use of the same in the dispositive briefing.
10/04/2024	0.20	Correspond with Mahmoud regarding basis for the interaction with Mr. Montgomery.
10/08/2024	0.40	Conference call with Shane to discuss additional details of encounter with Plaintiff in consideration of affidavit needs.
10/08/2024	0.50	Conference call with Mahmoud regarding pending motion for summary judgment and to obtain additional details regarding encounter with plaintiff.
10/08/2024	0.40	Consider plaintiff's misrepresentation of alleged undisputed facts an scope of rebuttal needed to include in affidavit.
10/08/2024	0.60	Work on affidavit to include in reply for motion for summary judgment.
10/08/2024	0.90	Receipt and analysis of additional appellate decisions in cases brought by Mr. Montgomery and relied upon by him in regard to motions.
10/09/2024	1.50	Examine plaintiff's undisputed facts set forth in his cross motion for summary judgment and outline admissions to plaintiff's facts and denials with documented evidence refuting Plaintiff's claims.
10/09/2024	0.20	Follow up with Mahmoud to obtain assistance with his affidavit.
10/10/2024	1.50	Work on and finalize Best Buy's response to Plaintiff's cross motion for summary judgment.
10/10/2024	1.70	Work on and finalize Best Buy's reply in support of motion for summary judgment.
10/10/2024	2.50	Work on response to plaintiff's alleged undisputed facts contained in his cross motion for summary judgment.
10/10/2024	1.00	Identify and work on Best Buy's undisputed facts for use in response to Plaintiff's cross motion for summary judgment.
10/10/2024	0.70	Determine means of distinguishing Plaintiff's nonbinding case law contained in his response to Best Buy's motion for summary judgment.
10/11/2024	0.20	Receive and consider correspondence from Plaintiff regarding criticism of MSJ response and reply.
10/11/2024	0.20	Consider further to conduct of plaintiff.
10/21/2024	0.20	Consideration correspondence from pro se plaintiff regarding pending and future motions and respond accordingly.

10/22/2024	0.20	Receipt and consideration of plaintiff's motion for extended time to submit a reply in support of his cross MSJ and consider whether to respond to the motion.
10/25/2024	0.30	Confer with plaintiff regarding his opposition to new facts raised in Defendant's response to cross motion for summary judgment and purported problems with reply in opposition.
10/25/2024	0.20	Consider correspondence from plaintiff regarding issues with MSJ briefing, extended pages and forthcoming motion to modify limitations on motion.
10/29/2024	0.10	Receive and consider court order regarding plaintiff's motion to exceed page limit.
10/30/2024	1.20	Receipt and examination of plaintiff's 30-page reply in support of his cross motion for summary judgment and accompanying affidavits and consider whether to file sur reply based on erroneous arguments.
10/31/2024	0.20	Correspond with Khay regarding the status of dispositive motions.
11/01/2024	0.30	Receive call from pro se plaintiff regarding discovery requests and inability to produce without hearing.
11/04/2024	0.50	Examination of Plaintiff's discovery responses and affidavits in consideration of issues to be addressed during plaintiff's deposition.
11/05/2024	2.00	Analysis of plaintiff's deposition testimony and consider further investigation and discovery to propound and possible supplemental briefing on motions for summary judgment.
11/05/2024	0.40	Consider means of addressing and/or stopping plaintiff's alleged forthcoming lawsuits against Best Buy.
11/13/2024	0.30	Consider Plaintiff's purchase and return history for Black Friday 2023 and benefits of disclosing in current case.
11/19/2024	0.40	Receipt and analysis of Court Order granting Best Buy's MSJ and denying Plaintiff's Cross MSJ.
11/19/2024	0.10	Advise Best Buy of Court Orders on MSJs.
11/19/2024	0.20	Analysis of preliminary bill of costs to determine additional costs to include therein.
11/19/2024	0.20	Confer with Mr. Montgomery regarding forthcoming appeal of MSJ Orders.
11/25/2024	0.40	Analysis of case law and jury instructions regarding vexations and frivolous lawsuits and standard for proving the same.
11/27/2024	0.30	Strategize regarding overcoming impediments to service of notice of trespass.
11/27/2024	0.20	Consider scope of support for no trespass and whether to expand the same.
12/02/2024	0.20	Consider Plaintiff's forthcoming motion for reconsideration of the Judge's interpretation of the facts and law and viability of the same.
12/04/2024	0.20	Correspond with Khay regarding Plaintiff's motion for reconsideration of summary judgment orders.
12/04/2024	0.80	Examination of plaintiff's motion for reconsideration of order granting Best Buy's motion for summary judgment and denying plaintiff's motion and consider scope of response thereto.

12/04/2024	0.40	Examination of voluminous emails from Plaintiff attacking claim for costs and attorney's fees and arguing for his motion for reconsideration.
12/20/2024	0.40	Work on and finalize Best Buy's Response to Plaintiff's Motion for Reconsideration.
12/31/2024	0.30	Work on and finalize motion for attorney's fees, pursuant to order granting Summary Judgment.
12/31/2024	0.20	Correspond with Khay regarding plaintiff's post trial motions.
01/02/2025	0.70	Examination of plaintiff's reply in support of motion for reconsideration and consider whether further briefing is warranted via a sur reply.
01/06/2025	0.20	Consider advisement from plaintiff of intent to continue to pursue reconsideration and whether we stop such efforts.
01/06/2025	0.20	Receipt and consideration of order denying plaintiff's motion for reconsideration of MSJ rulings.
01/07/2025	0.20	Consider Court order granting bill of costs and means of pursuing the same.
01/08/2025	0.20	Compare original and amended bill of costs orders to determine modifications made by the Court.
01/22/2025	0.50	Receipt and analysis of plaintiff's second motion for reconsideration and consider whether a legal basis exists to stop repeated motions for reconsideration after final judgement.
01/22/2025	0.50	Receipt and analysis of plaintiff's belated response to motion for attorney's fees and consider whether a response is necessary.
01/28/2025	0.20	Work on and finalize reply in support of motion for attorneys fees.
01/28/2025	0.30	Confer with plaintiff regarding pending and forthcoming motions and appeals.
02/07/2025	0.40	Correspond with Khay Harris to advise them about responding to Plaintiff's second motion for reconsideration and also to discuss the motion for attorney's fees.
02/07/2025	0.30	Work on map exhibit to dispositive motion.
02/07/2025	0.10	Finalize response to second motion for reconsideration.
02/07/2025	0.20	Confer with Mr. Montgomery regarding pending motions and Rule 121 conferral requirements.
02/14/2025	0.20	Analysis of plaintiff's reply in support of second motion for reconsideration.
02/18/2025	0.20	Receipt of Court order denying plaintiff's second motion for reconsideration and consider further options plaintiff may pursue.
Total	76.9	

Katie I. Salazar (Paralegal)

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
12/14/2023	1.50	Analysis of initial communications with client and claim file materials for initial case assessment.

12/19/2023	0.50	Analysis of initial communications with client and claim file materials for initial case assessment.
12/19/2023	2.60	Investigation into Plaintiff Montgomery to include CBI and COCOURTS and ICCESS and Pacer and Bankruptcy Court and Westlaw and Instant Checkmate and Lien search and Social Media to gather information on Plaintiff.
12/22/2023	0.30	Analysis of all prior court documents in this case for relevance and deadlines for our client and defense obligations.
12/27/2023	6.30	Analysis and organization of any and all court proceedings the plaintiff has been involved in prior to this case for defense litigation purposes.
01/08/2024	0.40	Modify previous court proceeding document files to organize documents to prepare for our defense.
01/09/2024	0.60	Analyze case activity and progress to identify any upcoming defense obligations or deadlines.
01/17/2024	0.30	Analyze recent case activity and progress to identify any upcoming defense obligations or deadlines.
01/17/2024	0.10	Author communication to our client to determine if service has been made in order for our firm to file an answer.
01/24/2024	2.00	Analysis of plaintiffs you tube accounts and possible TikTok accounts with analysis of posted videos of plaintiff.
02/05/2024	0.60	Begin authoring defendants initial disclosure statement.
02/05/2024	0.50	Analysis of claim file documents to supplement defendants initial disclosure statement to include all individuals likely to have discoverable information and include details regarding knowledge of incident.
02/22/2024	0.10	Author communication to our client Lucy in order to obtain the policy information for disclosure purposes.
02/27/2024	0.20	Continue authoring defendants initial disclosure statement.
02/29/2024	0.20	Correspond with the court regarding the case management conference to advise of issues to be resolved among counsel with the court.
02/29/2024	0.20	Author communication to plaintiff to determine setting case management conference.
02/29/2024	0.10	Correspond with plaintiff regarding the upcoming case management conference to advise of issues to be resolved with the court.
02/29/2024	0.20	Author the Notice of Case Management Document.
03/05/2024	0.20	Obtain web ex information from Jefferson County website for upcoming case management conference.
03/05/2024	0.10	Complete the notice of case management document.
03/11/2024	0.40	Author defendants privilege documents for bates stamps for our privilege log disclosure.
03/11/2024	0.70	Author defendants initial privilege log document.
03/21/2024	0.30	Author communication to plaintiff to observe proposed case management order prior to filing.
03/27/2024	0.40	Analysis of case management conference that provided updated information for trial date and new case management conference date.
04/12/2024	0.80	Analysis of plaintiffs initial disclosure video to observe certain activities and words said for memorandum.

04/16/2024	0.40	Analysis of amended case management order to determine newest dates issued by the court.
04/24/2024	0.10	Analyze and evaluate disclosures plaintiff and defendant in order to prepare a production database to include all pertinent information regarding produced and disclosed documents.
04/24/2024	0.30	Communication with the court clerk in order to obtain pre-trial availability for our calendar and plaintiffs.
04/25/2024	0.10	Author communication with the plaintiff to provide information regarding the required in person for pre trial conference.
04/25/2024	0.10	Communication with the court on in person pre trial conference information.
04/25/2024	0.10	Prepare the notice of pre trial conference to notify the plaintiff and court of required attendance.
Total	4.3	

Glenn D. Germany

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
01/24/2024	0.20	Engaged in email communication with claim rep regarding complaint filing and answer.
01/24/2024	1.30	Reviewed and analyzed Plaintiff's lawsuit against Walmart and the appellate court decision regarding same to help craft answer to current complaint.
01/24/2024	1.30	Reviewed and analyzed Plaintiff's lawsuits against law enforcement officers and the courts written decisions regarding the same to help author answer to current complaint.
01/24/2024	1.30	Reviewed and analyzed Plaintiff's social media and online posts/videos to help craft answer to current complaint.
01/24/2024	1.30	Authored answer to plaintiff's complaint.
01/25/2024	1.20	Reviewed and analyzed court ruling in Plaintiff's current lawsuit against city police for unlawful detention at Walmart.
01/25/2024	1.20	Reviewed and analyzed court ruling in Plaintiff's lawsuit against Fort Collins city police for 4 th Amendment violations at city park.
01/25/2024	1.20	Continued work authoring Answer to Plaintiff's Complaint.
02/05/2024	0.10	Made revisions to Answer.
02/06/2024	0.50	Reviewed and analyzed Plaintiff's court cases against Walmart to find similarities.
02/06/2024	0.20	Engaged in email communication with claim rep regarding proposed Answer.
02/08/2024	0.10	Finalized Answer before filing.
02/20/2024	0.20	Engaged in email communication with Plaintiff regarding case conferral as required by court.
02/20/2024	0.50	Considered and analyzed benefits of staying under CRCP 16.1 rules vs CRCP 16.

02/20/2024	0.50	Considered and analyzed claim file to determine what witnesses and information is needed for defense.
02/21/2024	1.00	Engaged in telephone communication with Plaintiff as required by court conferral conferences.
02/21/2024	0.10	Engaged in email communication with claim rep regarding discussions with Plaintiff and evidence needed for case.
02/26/2024	1.00	Reviewed and analyzed claim notes to help author case management report for claim rep's review.
02/26/2024	1.00	Reviewed and analyzed Plaintiff's filings and videos to help author case management report for claim rep's review.
02/26/2024	1.00	Considered Shopkeeper's Privilege, attorneys fees statute, and other statutes to help author case management report for claim rep's review.
02/27/2024	0.20	Received and analyzed email communications between Sedgwick and Best Buy store.
02/27/2024	0.10	Finalized notice for hearing setting to set Case Management Conference.
02/27/2024	0.50	Considered and analyzed Shopkeeper's Privilege and how that might affect our defense and provided analysis to claim rep regarding the same.
02/27/2024	0.50	Considered and analyzed Plaintiff's complaint and other court cases and how that might affect our defense and provided analysis to claim rep regarding the same.
02/27/2024	0.60	Authored case analysis to claim rep providing opinions on strategies, settlement possibilities, and available defenses.
03/05/2024	0.30	Authored initial disclosure statement.
03/05/2024	1.00	Reviewed and analyzed claim file for documents that should or should not be produced in initial disclosures.
03/19/2024	0.80	Authored proposed Case Management Order.
03/27/2024	0.80	Appeared at Case Management Conference.
03/27/2024	0.10	Engaged in email communication with client regarding summary of case management conference.
04/09/2024	0.80	Reviewed and analyzed claim file for documents that need to be disclosed pursuant to CRCP 26
04/09/2024	0.40	Reviewed and analyzed Plaintiff's inputs into proposed case management order.
04/12/2024	0.30	Engaged in communication with claim rep providing summary of Plaintiff's body cam footage.
04/12/2024	0.50	Reviewed and analyzed Plaintiff's body cam footage from the date of the incident.
04/16/2024	0.40	Appeared virtually at Case Management Conference.
04/16/2024	0.10	Finalized initial disclosure statement before serving.
04/25/2024	0.10	Received and analyzed email from claim rep regarding Plaintiff's body cam footage.
04/26/2024	0.20	Engaged in email communication with new claim rep regarding Plaintiff's body cam footage and the employees we need to find.
05/08/2024	0.20	Engaged in email communication with Plaintiff regarding trial dates and moving the same.

05/14/2024	0.40	Authored motion to continue trial date.
05/28/2024	0.10	Received and analyzed email from claim rep regarding locating potential witnesses and their need for depositions.
05/28/2024	0.30	Reviewed claim file, court filings, and communication with court to determine whether court has yet to rule on our motion to continue.
05/28/2024	0.50	Engaged in telephone communication with Best Buy employee who stopped Plaintiff outside store to get better picture of the incident.
05/28/2024	0.10	Engaged in email communication with Best Buy employees regarding Plaintiff's video.
05/29/2024	0.60	Reviewed and analyzed text messages from Best Buy manager regarding Montgomery's attempts to take items without showing receipt in November 2023 at multiple Best Buys and reviewed court cases to see if Montgomery has filed other lawsuits against other stores recently.
06/03/2024	0.70	Began work authoring written discovery to Plaintiff.
06/04/2024	0.10	Received and analyzed email from store manager regarding security reports and sharing amongst stores.
06/14/2024	0.10	Reviewed and analyzed court's order on our motion to continue trial.
06/18/2024	1.30	Reviewed and analyzed Plaintiff's lawsuits against a shopping mall and University of Denver to see if Plaintiff employed similar tactics and arguments.
06/19/2024	1.10	Reviewed and analyzed Plaintiff's court of appeals documents to build a motion for summary judgment.
06/19/2024	1.10	Reviewed and analyzed Plaintiff's district court documents to build a motion for summary judgment.
06/19/2024	1.10	Reviewed and analyzed Plaintiff's other court documents to help draft discovery request to Plaintiff.
06/20/2024	0.20	Analyzed and considered what information we can get from Plaintiff in order to build argument for summary judgment motion.
06/21/2024	0.90	Continued work authoring written discovery to Plaintiff.
07/16/2024	1.30	Reviewed and analyzed Plaintiff's previous filings to help draft MSJ.
07/19/2024	3.00	Authored Motion for Summary Judgment.
07/23/2024	0.20	Continued making revisions to MSJ.
07/29/2024	0.20	Reviewed and analyzed Plaintiff's response to our first set of written discovery.
08/09/2024	0.20	Reviewed case file and considered current litigation position and what steps need to be taken moving forward in order to put client in best position.
Total	36.6	

Jamie L. Gress (Paralegal)

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
05/15/2024	0.10	Correspondence to pro se plaintiff regarding motion to continue trial and reset.

05/28/2024	0.20	Communication to court clerk regarding pre trial conference and our motion to continue trial
06/20/2024	0.20	Correspondence to pro se plaintiff regarding Order regarding resetting Jury Trial and in person status conference for the same.
06/20/2024	0.20	Prepare Notice of Status Conference.
06/20/2024	0.20	Correspondence with pro se plaintiff regarding mandatory in person status conference to reset trial.
08/02/2024	0.20	Prepare notice of status conference
08/02/2024	0.10	Correspondence to pro se plaintiff regarding status conference to reset trial.
08/02/2024	0.20	Communication with court clerk regarding status conference to reset trial.
08/09/2024	0.20	Analyze case pleadings filed to date and our motion for summary judgment to determine future litigation needs.
Total	1.6	

Abigail L. Spohn (Paralegal)

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
06/20/2024	1.00	Conduct background search to include driving history and criminal history and social media history and court history and current relevant liens in order to obtain pertinent information in regard to our plaintiff.
06/21/2024	0.30	Modify document for a written discovery request for William Montgomery to be filed with the court.
07/22/2024	0.30	Gather documents form trial court case 2020CV000076 from ICCES involving Montgomery and Walmart.
07/22/2024	1.50	Prepare exhibits to be served with motion of summary judgment.
07/23/2024	0.50	Further research and locate CO district court cases to potentially include in upcoming motion.
07/23/2024	1.00	Locate and update exhibits to be filed with Motion for Summary Judgment, as well as analyze and download William Montgomery Youtube video, relevant to this case.
07/29/2024	0.20	Analyze initial disclosure documents from both plaintiff and defendant and update production log.
08/02/2024	0.20	Conduct correspondence with plaintiff regarding upcoming status conference hearing.
08/09/2024	0.30	Analyze CMO in light of new trial dates to identify future litigation and discovery needs.
08/09/2024	0.30	Conduct correspondence with plaintiff regarding Motion for Summary Judgment as well as print and mail MSJ document and exhibits to him.
08/13/2024	0.10	Conduct correspondence with plaintiff regarding service of MSJ and his expected form of service for future needs.
08/15/2024	0.10	Conduct correspondence with pro se plaintiff regarding the court's order to his previously filed motion.
09/17/2024	0.10	Conduct correspondence with pro se plaintiff about his own document/

		motion production.
09/23/2024	0.50	Analyze and evaluate Plaintiff's Transcript of Bodycam Footage which was produced with his Cross MSJ and compare to audio to ensure the transcript is accurate.
10/02/2024	1.30	Prepare first supplemental disclosure documents to include Bates Stamps and update supplemental disclosure statement accordingly.
10/02/2024	0.50	Prepare first supplemental disclosure statement to represent documents and information being produced in first supplemental disclosures.
10/03/2024	1.70	Analyze YouTube video posted by Plaintiff and create a word for word transcript to potentially use in response to cross MSJ.
10/03/2024	0.20	Analyze and evaluate plaintiff's other open lawsuits for the purposes of comparing these similar lawsuits to this current one.
10/03/2024	0.20	Conduct correspondence with client in order to share a video link to crucial footage regarding the investigation.
10/03/2024	0.30	Finalize first supplemental disclosure statement and documents and send to legal assistant to be served.
10/03/2024	2.10	Analyze and evaluate all documents and information that have been produced by plaintiff and take notes on each specifically noting any discrepancies between his stated facts.
10/04/2024	1.00	Continue to analyze YouTube video regarding plaintiff discussing similar cases in order to finish transcribing and add in time stamps for future needs and litigation purposes.
10/04/2024	0.30	Prepare second supplemental disclosure statement for newly found documents in preparation for supplemental disclosure.
10/07/2024	1.20	Analyze and evaluate Plaintiff's claimed facts and determine whether they can be denied based on the video evidence we received from plaintiff.
10/09/2024	0.40	Begin background search on third witness to the incident to try and locate him or contact him for the purposes of gaining more information on the incident.
10/10/2024	0.30	Continue to prepare second supplemental disclosure statement by adding three individuals contact information as they have discoverable information on the incident since they were witnesses.
10/10/2024	0.40	Prepare and label exhibits to be attached to reply to plaintiff's response to our motion for summary judgment.
10/14/2024	0.10	Conduct correspondence with Pro se Plaintiff regarding Notice of Deposit filed with the court today as well as sending a link to the Exhibit mentioned in the Notice for his records.
10/14/2024	0.40	Prepare a notice of deposit in order to submit a video exhibit to the court that was mentioned in the response to plaintiff's cross MSJ as well as prepare flash drive to be sent to court.
10/21/2024	0.80	Analyze and evaluate state and federal e-filing systems in order to locate new cases that plaintiff is involved in and download filings to examine for the purposes of this litigation.
10/21/2024	0.30	Prepare notice of deposition of plaintiff William Montgomery.
10/29/2024	0.10	Conduct correspondence with plaintiff in order to send him the documents filed in court today.

10/29/2024	0.10	Conduct correspondence with plaintiff in order to send him the court's order from today on his earlier motion.
10/31/2024	0.30	Analyze and finalize 2nd supplemental disclosure document and attached documents and serve to plaintiff via email.
11/01/2024	0.20	Conduct correspondence with the court of clerks office in Jefferson County in order to obtain discovery dispute hearing dates.
11/04/2024	1.50	Prepare documents to be used as exhibits in the deposition of plaintiff as well as create binder and cover sheet for organization purposes of attorney's line of questioning.
11/04/2024	0.10	Conduct correspondence with court reporting group in order to confirm details and scheduling of deposition for tomorrow.
11/04/2024	0.10	Conduct correspondence with plaintiff in order to send over details about the zoom deposition to occur tomorrow.
11/04/2024	0.50	Prepare a lawsuit database with all pertinent information regarding plaintiff's previous lawsuits to be able to reference during plaintiff's deposition.
11/04/2024	0.30	Analyze and evaluate all recent discovery and disclosures from plaintiff and defendants in order to update production database to include all pertinent information regarding produced and disclosed documents.
11/05/2024	0.10	Locate and prepare a few more exhibits to add in plaintiff's deposition occurring now.
11/05/2024	0.30	Prepare and update 3rd set of written discovery document in order to be able to serve discovery during deposition.
11/05/2024	0.50	Analyze MSJ and Cross-MSJ for locations of specific statements made by plaintiff that contradict each other for use in depo.
11/07/2024	0.50	Gather and prepare documents used in plaintiff's deposition including finding emails sent by plaintiff that were used as exhibits in order to send to court reporter.
11/07/2024	0.10	Conduct correspondence with court reporter in order to send over all exhibits used in the deposition of plaintiff.
11/13/2024	0.40	Author third supplemental disclosure statement to include new documents being produced and associated Bates Stamps as well as prepare documents to be disclosed.
11/14/2024	0.10	Finalize and email defendant's third supplemental disclosures to pro se plaintiff via his preferred serving method.
11/14/2024	0.30	Author subpoena for plaintiff's brother in preparation for serving prior to deposition.
11/18/2024	0.10	Conduct correspondence with pro se plaintiff and plaintiff's brother regarding deposition taking place in two days.
11/19/2024	1.10	Begin to prepare a Bill of Costs after case was dismissed without prejudice in order to determine amount for attorney's fees.
11/21/2024	0.40	Continue to prepare a Bill of Costs after receiving further expense information regarding background and investigation costs.

11/25/2024	0.20	Analyze Colorado Courts E-Filing to determine lawsuits plaintiff filed over the weekend and download the ones not already sent regarding Best Buy.
12/31/2024	0.10	Correspond with William Montgomery about his reply brief in support of the motion for reconsideration.
02/28/2025	0.90	Prepare exhibits to be filed with Motion to Reconsider Order regarding Court Fees.
Total	5.1	

Stephanie E. Boutsicaris

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
08/12/2024	0.50	Correspond with Plaintiff about his response to the motion for summary judgment and the issues with service of our motion for summary judgment.
08/12/2024	0.20	Correspond with Sedgwick about our pending motion for summary judgment.
08/13/2024	0.10	Correspond with Sedgwick about Plaintiff's request for an extension on his response brief for Best Buy's motion for summary judgment.
08/13/2024	0.20	Correspond with Plaintiff about his response to Best Buy's motion for summary judgment.
08/14/2024	0.20	Correspond with Plaintiff about his responses to written discovery.
08/15/2024	0.10	Analyze Plaintiff's responses to Best Buy's first set of written discovery requests.
08/15/2024	0.20	Correspond with Plaintiff about Best Buy's motion for summary judgment and Plaintiff's motion for extension of time.
09/11/2024	0.30	Correspond with Sedgwick about our motion for summary judgment and settlement negotiation strategy.
09/12/2024	0.20	Correspond with Sedgwick about mediation.
09/12/2024	0.20	Correspond with Plaintiff about mediation.
09/13/2024	0.10	Correspond with Sedgwick about mediation.
09/13/2024	0.30	Analyze Best Buy's motion for summary judgment to strategize about how to present the shopkeepers' privilege as a defense.
09/16/2024	0.10	Correspond with Sedgwick to discuss strategy for motions for summary judgment.
09/17/2024	0.20	Correspond with Plaintiff about the motion to exceed the page limit.
09/17/2024	0.10	Analyze whether to object to Plaintiff exceeding the page limit given his history of prior claims.
09/19/2024	0.10	Correspond with Plaintiff about his response brief to Best Buy's motion for summary judgment and his own cross-motion for summary judgment.
09/19/2024	0.30	Correspond with Plaintiff about Best Buy's position concerning his motion to submit video evidence.
09/20/2024	0.10	Correspond with Plaintiff about his exhibits for his response to our motion for summary judgment.

09/23/2024	1.00	Analyze Plaintiff's 32-page response to Best Buy's motion for summary judgment.
09/23/2024	0.10	Analyze Plaintiff's motion to exceed the page count for his response brief for Best Buy's motion for summary judgment.
09/23/2024	0.50	Analyze Plaintiff's 22-page cross-motion for summary judgment.
09/23/2024	0.10	Analyze Plaintiff's motion to submit video evidence.
09/23/2024	0.20	Analyze Plaintiff's affidavit in support of his response to Best Buy's motion for summary judgment.
09/25/2024	0.30	Strategize about additional information needed to respond to Plaintiff's motion for summary judgment and his response to Best Buy's motion for summary judgment.
09/26/2024	0.30	Correspond with Sedgwick about Plaintiff's likely strategy in filing a motion for summary judgment.
09/26/2024	0.70	Correspond with Sedgwick about receipt evidence available to produce demonstrating the purchase Plaintiff made.
09/26/2024	0.10	Analyze receipts of Plaintiff's purchases to potentially produce.
09/27/2024	0.20	Analyze the internal summary of Plaintiff's receipt data showing repetitive purchases all over the greater Denver metro area in a small amount of time and consider how the same will fit into dispositive motion strategy.
09/27/2024	0.50	Correspond with Khay Harris about receipt data for Plaintiff's Best Buy purchases and how to interpret the same.
09/27/2024	0.10	Correspond with Best Buy employees about the need for affidavits from them to support our dispositive motions.
09/30/2024	0.40	Analyze Plaintiff's assertions in his motion for summary judgment and assess rebuttal arguments.
10/02/2024	0.40	Strategize about how to argue the shopkeepers doctrine and present supporting legal authority in our reply brief for our motion for summary judgment.
10/02/2024	0.60	Strategize about summary judgment briefs and exhibits to include and utilizing legal doctrines that could rebut Plaintiff's exhibits.
10/02/2024	0.10	Strategize about additional documents to disclose pursuant to Rule 26.
10/02/2024	0.10	Correspond with Mahmoud about information that could be helpful in responding to Plaintiff's motion for summary judgment.
10/03/2024	0.20	Correspond with Plaintiff about Defendant's motion for extension of time to file a reply brief.
10/03/2024	0.20	Correspond with Best Buy and Sedgwick about the YouTube videos by Plaintiff discussing his plans to frame stores for false imprisonment.
10/03/2024	0.20	Analyze dozens of Reddit posts and comments concerning Plaintiff's lawsuits and plans to frame stores with false imprisonment and consider additional discovery needed in relation to these posts.
10/03/2024	0.30	Strategize about responding to facts from Plaintiff's motion for summary judgment briefs that may be depicted in the videos of the incident.
10/03/2024	0.30	Strategize about how to incorporate new evidence into a reply brief for Best Buy's motion for summary judgment.

10/04/2024	0.20	Correspond with Mahmoud about his recollection of the subject incident.
10/04/2024	0.10	Strategize about additional information to include in supplemental Rule 26 disclosures in light of recent investigations.
10/04/2024	0.10	Analyze the Court's order granting the motion for extension of time to submit a reply brief for Defendants' motion for summary judgment.
10/07/2024	0.80	Analyze the pen camera video from the incident in order to identify excerpts to cite in summary judgment briefing.
10/07/2024	0.50	Analyze the YouTube video concerning Mr. Montgomery's motive in refusing to provide receipts in order to identify excerpts to cite in summary judgment briefing.
10/08/2024	0.20	Phone call with Shane to determine additional facts to support our summary judgments briefings.
10/08/2024	0.20	Phone calls to James concerning his recollection of the incident in order to use in summary judgment briefing.
10/08/2024	0.20	Phone calls with Mahmoud concerning his recollection of the incident in order to use in summary judgment briefing.
10/08/2024	3.50	Draft replies to Plaintiff's responses to our factual assertions in the reply brief for motion for summary judgment including an analysis of what is supported by reasonably reliable evidence.
10/08/2024	0.20	Consider factual information to include in a draft of an affidavit that will be executed and attached to summary judgment briefings.
10/08/2024	0.20	Analyze publicly available records and information for James Robinson in anticipation of contacting him to draft an affidavit.
10/09/2024	0.20	Correspond with Sedgwick about strategies for deterring Mr. Montgomery from future conduct that could result in liability or lawsuits for Best Buy.
10/09/2024	0.20	Correspond with Sedgwick about our conversation with Mahmoud and Shane and our attempts to locate James Robinson.
10/09/2024	0.20	Strategize about additional witness disclosures including James Robinson.
10/09/2024	3.50	Continue drafting the reply brief in support of motion for summary judgment by responding to Plaintiff's statement of additional facts and amending the introduction section to synchronize with these responses.
10/09/2024	0.20	Correspond with Sedgwick about obtaining information about the registers Plaintiff used for his in-store purchases in order to determine if it was consistent with his modus operandi of using back checkout counters to induce suspicion of shoplifting.
10/09/2024	0.30	Strategize about locating and interviewing former Best Buy employee James Robinson.
10/10/2024	9.20	Finish drafting the reply brief for the Motion for Summary Judgment by drafting the argument section and amending the factual responses based upon Mahmoud's affidavit and to synchronize with the factual responses in our response to the cross motion for summary judgment.
10/10/2024	0.30	Correspond with Mahmoud about executing an affidavit in support of our summary judgment briefings.
10/10/2024	0.20	Strategize about submitting a motion for extension of time for our response to Plaintiff's cross-motion for summary judgment.

10/10/2024	0.60	Strategize about arguments to assert in response to the cross-motion for summary judgment.
10/10/2024	0.30	Correspond with Plaintiff to confer on a motion for extension of time.
10/11/2024	0.10	Strategize about ensuring service requirements are met for the motion for summary judgment briefings given Plaintiff's prior complaints of late notice of motions.
10/11/2024	0.20	Strategize about what written discovery could besought from Mr. Montgomery.
10/11/2024	0.10	Correspond with Plaintiff about his deposition.
10/11/2024	0.10	Correspond with Plaintiff about his counterarguments to our allegations in the motion for summary judgment.
10/11/2024	0.20	Strategize about deposing Mr. Montgomery.
10/14/2024	0.10	Finalize the notice of deposit in order to submit additional video evidence into summary judgment briefings.
10/14/2024	0.10	Analyze the Court's order granting Plaintiff's motion to submit video evidence to the Court.
10/17/2024	0.10	Correspond with Plaintiff about his upcoming deposition.
10/18/2024	0.10	Correspond with Plaintiff about his upcoming deposition.
10/20/2024	0.20	Correspond with Plaintiff about the other lawsuits he is citing in his conferral for an extension on summary judgment briefing.
10/21/2024	0.50	Correspond with Plaintiff about his request for additional time to submit a reply brief to his motion for summary judgment.
10/21/2024	0.30	Correspond with Plaintiff about his upcoming deposition.
10/21/2024	0.30	Strategize about whether to oppose Plaintiff's request for additional time to file his reply brief for his motion for summary judgment.
10/22/2024	0.10	Analyze Plaintiff's motion for extension of time and consider the need to submit a response.
10/22/2024	0.10	Correspond with Plaintiff about the motion for extension of time to submit his reply brief for his motion for summary judgment.
10/25/2024	0.10	Correspond with Plaintiff about his request to exceed the page limit on his reply brief for the cross motion for summary judgment.
10/28/2024	0.30	Analyze Plaintiff's reply to his cross motion for summary judgment.
10/28/2024	0.90	Draft opposition in response to Plaintiff's motion to exceed the page count.
10/28/2024	0.30	Strategize about written discovery needed to rebut Plaintiff's affidavit allegations.
10/28/2024	0.20	Analyze the exhibits and affidavit submitted with Plaintiff's reply brief on summary judgment and consider the need for motions practice to address the same.
10/28/2024	0.30	Confer regarding Plaintiff's request to exceed the page limit on his reply brief to the motion for summary judgment.
10/28/2024	0.10	Analyze the Court's order granting Plaintiff's motion for extension of time to file a reply brief.
10/29/2024	0.60	Draft second set of written discovery requests.

10/29/2024	0.10	Correspond with Plaintiff about the order partially granting Plaintiff's motion to exceed the page count.
10/29/2024	1.50	Draft discovery conferral letter to Plaintiff concerning his deficient and evasive discovery in order to tee up a potential Rule 37 motion that could provide a back up plan if motion for summary judgment is unsuccessful.
10/29/2024	0.10	Analyze the Court's order partially granting Plaintiff's motion to exceed the page count.
10/29/2024	0.30	Strategize about questions to ask at Plaintiff's deposition rather than asking by way of interrogatory.
10/30/2024	0.10	Correspond with Plaintiff about his deficient discovery responses and the likelihood for the need to go to discovery dispute on the issues.
10/30/2024	0.10	Correspond with Plaintiff about his proffered motion to strike his previous reply brief.
10/31/2024	0.10	Strategize about using Plaintiff's statements about the Reddit comments in future Rule 26 disclosures.
10/31/2024	0.20	Correspond with Plaintiff about Best Buy's 2 nd Supplemental Disclosures.
10/31/2024	0.20	Amend supplemental disclosure statement to include additional witnesses.
10/31/2024	0.40	Correspond with Khay Harris about the forthcoming disclosures and discovery expected from Plaintiff concerning authorized users and Plaintiff's second attempt at a reply brief for his motion for summary judgment.
10/31/2024	0.20	Correspond with Plaintiff about his deficient discovery responses and disclosures and the likelihood of a discovery dispute hearing.
11/01/2024	0.10	Correspond with Plaintiff about his reply brief for his cross motion for summary judgment.
11/01/2024	0.10	Analyze Plaintiff's motion to strike his previous reply brief for his cross motion for summary judgment.
11/01/2024	0.20	Analyze Plaintiff's amended reply to his motion for summary judgment.
11/01/2024	0.60	Strategize about Plaintiff's bad faith and evasive discovery responses in light of the recent amended disclosures and discovery responses and consider what potential discovery motions.
11/01/2024	0.90	Correspond with Plaintiff about curing his deficient written discovery responses.
11/01/2024	0.20	Analyze Plaintiff's amended responses to the first set of written discovery and consider how they compare and contradict the previous responses.
11/01/2024	0.10	Analyze Plaintiff's responses to Best Buy's second set of written discovery.
11/01/2024	0.20	Analyze Plaintiff's untimely produced documentation of authorized users and Best Buy purchases.
11/01/2024	0.20	Analyze the Court's orders to determine the Court's discovery dispute procedure.
11/01/2024	0.40	Phone calls with Plaintiff about his deficient discovery requests.
11/01/2024	0.10	Correspond with Plaintiff about his reply brief for his cross motion for summary judgment.
11/02/2024	0.20	Strategize about how to address Plaintiff's evasive and contradictory responses to written discovery.

11/02/2024	0.30	Strategize whether a discovery dispute before Plaintiff's deposition is necessary.
11/03/2024	0.20	Strategize about Rule 37 remedies and the timing of requesting the same and how to utilize Plaintiff's YouTube video to show that he deliberately withheld information.
11/03/2024	0.70	Draft a third set of written discovery to serve upon Plaintiff.
11/04/2024	0.20	Consider whether Plaintiff complied with the Court's order to shorten his reply brief by just moving arguments to footnotes.
11/04/2024	0.20	Strategize about documents and materials to use at Plaintiff's deposition.
11/05/2024	5.20	Depose William Montgomery.
11/05/2024	0.20	Correspond with the court reporter to confirm the exhibit list used for the deposition of William Montgomery.
11/05/2024	1.20	Prepare for the deposition of William Montgomery by analyzing exhibits to be used and formulating lines of questioning.
11/05/2024	0.50	Amend 3rd set of written discovery to Plaintiff to take into account the information learned at deposition concerning other documentation available for production.
11/05/2024	0.40	Correspond with Sedgwick about the likelihood of Plaintiff filing a Complaint concerning additional incidents at Best Buy for November 2023.
11/05/2024	0.10	Correspond with Plaintiff about Best Buy's third set of written discovery requests to Plaintiff.
11/05/2024	0.10	Consider whether meta data will be helpful in determining whether Plaintiff edited the videos that were provided in Rule 26 disclosures.
11/13/2024	0.10	Finalize the draft of the Third Supplemental Disclosures.
11/13/2024	0.30	Correspond with Khay Harris about banning Plaintiff from Best Buy properties and receipt information for Black Friday 2023.
11/13/2024	0.10	Correspond with Plaintiff about producing David Montgomery for a deposition.
11/14/2024	0.20	Finalize deposition subpoena and waiver in order to confirm it is compliant with Rules 30 and 45.
11/14/2024	0.20	Correspond with Plaintiff and David Montgomery about deposing David Montgomery and obtaining a waiver of subpoena.
11/15/2024	0.10	Reformat the subpoena to appear for deposition at the request of David Montgomery.
11/15/2024	0.30	Correspond with David Montgomery about the subpoena duces tecum and waiver and appearing a deposition.
11/15/2024	0.10	Correspond with William Montgomery about the need for a subpoena waiver from David Montgomery to proceed with scheduling his deposition.
11/15/2024	0.20	Strategize about the need to hire a process server for the deposition subpoena for David Montgomery and consider the timing of the same to ensure cooperation from Plaintiff and David Montgomery.
11/17/2024	0.10	Correspond with William Montgomery about procuring a waiver of service for David Montgomery's deposition subpoena.

11/17/2024	0.10	Analyze the waiver of service for David Montgomery's deposition subpoena to confirm it was properly executed and complies with Rule 30 and Rule 45.
11/18/2024	0.20	Correspond with William Montgomery to confer on his motion to add punitive damages.
11/18/2024	0.20	Strategize about rebuttal arguments to assert against a motion to add punitive damages.
11/18/2024	0.10	Correspond with Plaintiff about deposing his brother.
11/19/2024	0.20	Strategize about prejudice arguments to assert to rebut Plaintiff's motion to amend the Complaint.
11/19/2024	0.60	Correspond with Sedgwick and Best Buy about the Court's order dismissing Plaintiff's claims and the likelihood of an appeal.
11/19/2024	0.30	Strategize about information to elicit from David Montgomery that could provide a basis for motions practice.
11/19/2024	0.10	Correspond with David Montgomery about the cancellation of his deposition in light of the Court's dismissal of the Plaintiff's claims.
11/19/2024	0.20	Correspond with William Montgomery about the Court's order on summary judgment and his intent to appeal the order.
11/19/2024	0.30	Analyze and consider the impact of the Court's order for motion for summary judgment and consider the odds of success upon appeal.
11/19/2024	0.10	Strategize about obtaining a Bill of Costs in light of the unlikelihood Best Buy will be able to recoup such costs.
11/20/2024	0.10	Correspond with Sedgwick and Best Buy about the likelihood of Plaintiff filing another lawsuit against Best Buy for 2023 incidents.
11/21/2024	0.10	Strategize about expenses to include in a Bill of Costs.
11/26/2024	0.10	Strategize about additional information to include in a Bill of Costs.
11/26/2024	0.20	Strategize about whether it would be appropriate to request attorney's fees given the Court's ruling on summary judgment.
11/27/2024	0.30	Amend draft of Bill of Costs to reflect additional costs that were recently discovered.
12/02/2024	0.10	Correspond with Plaintiff about the proposed bill of costs to meet the Court's conferral requirements.
12/02/2024	0.40	Correspond with Sedgwick and advise as to the procedure for Plaintiff submitting an appeal in light of Plaintiff stating that he would do so.
12/02/2024	0.20	Correspond with Plaintiff to confer about Plaintiff's motion to reconsider the Court's order of summary judgment dismissing all of Plaintiff's claims.
12/02/2024	0.20	Strategize about objecting to the motion to proceed in forma pauperis.
12/03/2024	0.30	Analyze Plaintiff's motion for reconsideration and consider rebuttal arguments to assert.
12/03/2024	0.20	Correspond with Plaintiff about his objections to the Bill of Costs to be filed with the Court.
12/03/2024	0.20	Amend the Bill of Costs to include a paragraph concerning conferral edits and noting that Plaintiff did not provide his position before the Bill of Costs was filed.
12/04/2024	1.10	Correspond with Khay Harris to advise Sedgwick concerning Plaintiff's motion for reconsideration and to advise regarding the Bill of Costs and a

		Motion for Attorney's including a discussion of the collectability of such monetary awards.
12/04/2024	0.50	Correspond with Plaintiff to confer in advance of filing a motion for sanctions and attorney's fees.
12/19/2024	5.80	Draft Best Buy's Response in Opposition to Plaintiff's Motion to Reconsider
12/23/2024	3.20	Analyze Plaintiff's 200-page deposition transcript and identify excerpts to potentially use in a motion for attorney's fees or other future motions.
12/24/2024	0.60	Analyze Plaintiff's YouTube video to identify excerpts and quotes to reference in a motion for attorney's fees.
12/24/2024	0.10	Correspond with Plaintiff about Best Buy's response to Plaintiff's Motion for Reconsideration.
12/30/2024	0.30	Correspond with Plaintiff about the case law cited in Best Buy's response to the motion for reconsideration.
12/30/2024	6.20	Draft the motion for attorney's fees at the request of Khay Harris.
12/31/2024	0.70	Finalize the motion for attorney's fees by including additional citations to quotes from Mr. Montgomery highlighting the sting he set up for Best Buy.
12/31/2024	0.30	Analyze Plaintiff's reply brief in support of his motion for reconsideration and consider what steps to take if the motion is granted.
12/31/2024	0.20	Draft a proposed order for the motion for attorney's fees.
12/31/2024	0.20	Correspond with Khay Harris to advise about the procedural posture of dispositive motions and the likelihood of Plaintiff appealing.
12/31/2024	0.60	Draft Rule 60 Notice to address legal authority citations.
12/31/2024	0.30	Analyze exhibits to be submitted with the Court to confirm that the correct emails and the correct deposition excerpts are submitted with Best Buy's response to the motion for reconsideration.
12/31/2024	0.10	Correspond with William Montgomery about his reply brief in support of the motion for reconsideration.
01/02/2025	0.20	Correspond with William Montgomery about the motion for attorney's fees and the Rule 60 notice filed with the Court.
01/02/2024	0.10	Correspond with Plaintiff on the motion for attorney's fees.
01/06/2025	0.30	Correspond with Plaintiff about the Court's order denying Plaintiff's motion for reconsideration and confer about Plaintiff's forthcoming second motion for reconsideration.
01/06/2025	0.20	Correspond with Khay Harris about the court's order rejecting Plaintiff's motion for reconsideration and the recently submitted motion for attorney's fees.
01/06/2025	0.10	Analyze the Court's order denying Plaintiff's motion for reconsideration.
01/06/2025	0.30	Strategize about whether Rule 121 imposes and deadlines and procedures on Plaintiff's ability to contest the bill of costs.
01/07/2025	0.20	Strategize about and anticipate Plaintiff contesting the Court's order on the bill of costs and how Best Buy will respond.
01/07/2025	0.10	Correspond with Plaintiff about the Court's order on Best Buy's bill of costs.
01/07/2025	0.10	Correspond with Khay Harris about the court's order on the bill of costs.

01/07/2025	0.10	Analyze the Court's order on the bill of costs.
01/08/2025	0.10	Correspond with Plaintiff about the Amended Order regarding Best Buy's bill of costs.
01/08/2025	0.10	Analyze the Court's amended order on Best Buy's bill of costs.
01/08/2025	0.20	Correspond with Khay Harris about the court's order on the bill of costs.
01/21/2025	0.10	Correspond with Plaintiff about his response to Best Buy's motion for attorney's fees and his second motion for reconsideration.
01/22/2025	0.30	Analyze and consider the impact of Plaintiff's response to the motion for attorney's fees.
01/22/2025	0.20	Analyze and consider the impact of Plaintiff's second motion for reconsideration.
01/23/2025	0.30	Correspond with Khay Harris about the ongoing motions practice from the Black Friday 2022 claim including the motion for attorney's fees and motion for reconsideration and the bill of costs granted by the Court.
01/23/2025	0.20	Strategize about how Best Buy should address the other similar lawsuits in its motion for attorney's fees.
01/28/2025	4.20	Draft Reply Brief in support of Defendant's Motion for Attorneys' Fees.
01/28/2025	0.30	Strategize about how to address the lack of a formal filing of Plaintiff's response to the motion for attorney's fees.
01/28/2025	0.30	Correspond with Plaintiff about the briefings for the Motion for Attorneys' Fees and the clerical errors therein.
01/28/2025	0.20	Analyze the Court docket and Plaintiff's other court filings to determine if there is a clerical error with Plaintiff's Response to the motion for attorney's fees that may require correction under Rule 60.
01/28/2025	0.20	Analyze the pleadings in the three new Best Buy lawsuits to determine if false imprisonment was similarly asserted and if that fact should be addressed in the briefing concerning attorney's fees.
02/05/2025	0.40	Correspond with Khay Harris to advise them about responding to Plaintiff's second motion for reconsideration and also to discuss the motion for attorney's fees.
02/07/2025	0.70	Draft Best Buy's Response in Opposition to Plaintiff's Second Motion for Reconsideration.
02/15/2025	0.20	Analyze and consider the impact of Plaintiff's reply to his second motion for reconsideration.
02/15/2025	0.10	Correspond with Plaintiff about his reply in support of his motion for reconsideration.
02/18/2025	0.10	Analyze the Court's order denying Plaintiff's second motion for reconsideration.
02/25/2025	0.10	Correspond with Khay Harris about Plaintiff's second motion for reconsideration.
02/28/2025	0.20	Correspond with Plaintiff about the motion to reconsider court fees for the Black Friday 2022 lawsuit appeal.
02/28/2025	1.80	Draft motion to reconsider the Court's Order regarding court fees.
02/28/2025	0.10	Draft proposed order for the motion to reconsider the Court's Order re Court Fees.
Total	36.3	

Mary B. Pucelik

<u>Date</u>	<u>Time Spent</u>	<u>Task Performed</u>
10/10/2024	7.20	Draft additional undisputed material facts and responsive arguments in Defendant's response to Plaintiff's cross motion for summary judgment.
Total	7.2	