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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

LOS ANGELES CATHOLIC
WORKER, AN
UNINCORPORATED
ASSOCIATION; CANGRESS, A
NON-PROFIT CORPORATION;
HARRY JAMES JONES, LOUIS
GRADY, LLOYD HINKLE,
WALTER SHOAF, INDIVIDUALS,

Plaintiff(s),

vs.

LOS ANGELES DOWNTOWN
INDUSTRIAL DISTRICT
BUSINESS IMPROVEMENT
DISTRICT, CENTRAL CITY EAST
ASSOCIATION, INC., CITY OF
LOS ANGELES; DOES 1 -10,

Defendant(s).

CASE NO. CV 14-07344 PSG (AJW)

**SUPPLEMENTAL
DECLARATION OF CATHERINE
SWEETSER IN SUPPORT OF
REPLY TO PLAINTIFFS' EX
PARTE APPLICATION FOR
SANCTIONS**

Discovery Cutoff Date: 4/4/2016

Pretrial Date: 7/7/2016

Trial Date: 7/19/2016

Supplemental Declaration of Catherine Sweetser

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2 1. I am a partner in the law firm Schonbrun Seplow Harris &
3 Hoffman, LLP and a lead attorney in this matter. If called to testify, I could
4 testify accurately to the facts herein.

5 2. Since January 11, 2016, I have been involved in ongoing
6 meetings and conferences with the City Attorney regarding outstanding
7 discovery in this matter.

8 3. Between January 21 and February 17, 2016, I spent 1.3 hours
9 meeting and conferring in this matter by phone and email, in an attempt to
10 obtain documents responsive to Plaintiffs' requests for production, 1.8 hours
11 drafting and revising the current ex parte application and consulting with co-
12 counsel, and I also spent .5 hours at the telephonic court appearance of
13 January 29, 2016. A true and correct copy of my billing records related to
14 this motion up to February 17 are attached as Exhibit A.

15 4. Between February 17, 2016 and March 16, 2016, I spent 1.8
16 hours on legal research and drafting/editing related to this reply in support of
17 our motion for sanctions and 1.5 hours conferring with co-counsel about
18 what had and had not been produced and how best to proceed with the
19 lawsuit given the lack of production.

20 5. A true and correct copy of my billing records related to this
21 motion between February 17 and March 16 are attached as Exhibit B.

22 6. I am a 2008 graduate of New York University School of Law.
23 My 2015 billing rate was \$525.00, which I am requesting in this motion.

24 7. Last year, the City of Los Angeles agreed to pay my 2015
25 hourly rate of \$525 as part of the settlement agreement in *Lavan v. City of*
26 *Los Angeles*, No. 11-cv-02874-PSG-AJW.

27 8. My total fees incurred were \$3,675.
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I swear under penalty of perjury that the foregoing is true and correct.
Executed this 16th day of March at Los Angeles, California.



Catherine Sweetser

EXHIBIT A

Client	Project	Task	Description	Start date	Duration
Catholic Worker	Meet and confer		Call with Ron Whitaker re docs	1/22/2016	0:38:00
Catholic Worker	Meet and confer		Call with Ron Whitaker re docs	1/22/2016	0:14:22
Catholic Worker	Meet and confer		Draft email to Ron Whitaker	1/22/2016	0:22:34
Catholic Worker	Confer with co-counsel		Confer with co-counsel about court appearance tomorrow	1/28/2016	0:20:00
Catholic Worker	Confer with co-counsel		Confer with co-counsel about court appearance	1/29/2016	0:10:00
Catholic Worker	Court hearing		Telephonic court appearance on failure to comply with order	1/29/2016	0:30:00
Catholic Worker	Meet and confer		Call with opposing counsel re emails	2/1/2016	0:04:00
Catholic Worker	Confer with co-counsel		Call with co-counsel re ex parte	2/15/2016	0:03:00
Catholic Worker	Edit brief		Edit ex parte re sanctions	2/15/2016	0:53:00
Catholic Worker	Confer with co-counsel		Call with Shayla Myers re: ex parte	2/16/2016	0:07:00
Catholic Worker	Draft and sign declaration		Ex parte	2/17/2016	0:15:00
			Total		3:36:56

Total amount requested:

\$1,890.00

EXHIBIT B

Client	Project	Description	Date	Duration
Catholic Worker	Confer with co-counsel	Call with Shayla Myers re: City lack of response/ ex parte	2/22/2016	0:16:00
Catholic Worker	Draft pleading	Edit supplemental declaration for ex parte	2/23/2016	0:20:00
Catholic Worker	Confer with co-counsel	Call with Shayla Myers re: City lack of response/ ex parte	2/24/2016	0:30:00
Catholic Worker	Confer with co-counsel	Call with Shayla Myers re responses from City	3/7/2016	0:22:00
Catholic Worker	Confer with co-counsel	Confer with co-counsel re contempt sanctions	3/15/2016	0:15:00
Catholic Worker	Motion to compel	Draft portion of reply to contempt motion	3/16/2016	0:40:00
Catholic Worker	Motion to compel	Legal research re evidentiary sanctions	3/16/2016	0:42:00
Catholic Worker	Motion to compel	Update declaration	3/16/2016	0:15:19
		TOTAL		3:20:19
		Total amount requested:		\$1,785