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FILED
San Francisco County Superior Court

AUG 11 2025

CLERK OF THE COURT

BY: [Signature]
Deputy Clerk

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Attorneys for Defendant
JACK POULSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

MAURY BLACKMAN, an individual

Plaintiff,

v.

SUBSTACK INC., a Delaware corporation;
AMAZON WEB SERVICES, INC., a
Delaware corporation; JACK POULSON, an
individual; TECH INQUIRY, INC., a
Delaware corporation; DOES 1-25, inclusive,

Defendants.

CASE NO.: CGC-24-618681

^{9 am}
~~PROPOSED~~ ORDER ON
DEFENDANTS' MOTION TO
RECOVER FEES AND COSTS

Courtroom: 301
Before: Hon. Christine Van Aken

Action Filed: October 3, 2024
Trial Date: None Set

~~PROPOSED~~ ORDER ON DEFENDANTS' MOTION TO RECOVER FEES AND COSTS
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1 Defendants' motion for attorneys' fees incurred in connection with their anti-SLAPP
2 motion is granted in part. For the reasons stated below, Substack is awarded \$211,102.50 in fees
3 and \$14,706.60 in costs. Poulson is awarded \$145,362.42 in fees. Tech Inquiry is awarded
4 \$40,280 in fees.

5 Plaintiff Maury Blackman filed this action against defendants Substack, Jack Poulson,
6 Tech Inquiry, and Amazon Web Services for publishing an incident report made by the San
7 Francisco Police Department when they responded to a report of domestic violence involving
8 Blackman. Blackman sued Poulson for publishing the incident report; he sued Substack and Tech
9 Inquiry for publishing the blog post on their respective websites, and he sued Amazon Web
10 Services for providing web hosting services for Substack. On February 14, 2025, this court
11 granted all four defendants' anti-SLAPP motions, striking the entire action.

12 Only Poulson, Substack, and Tech Inquiry move for attorneys' fees. "[A] prevailing
13 defendant on a special motion to strike shall be entitled to recover that defendant's attorney's
14 fees and costs." (Cal. Code Civ. Proc., § 425.16, subd. (c)(1).) Awarding fees achieves two
15 policy goals: (1) to discourage strategic lawsuits against public participation (SLAPPs), and (2)
16 to allow defendants faced with such suits to hire private counsel. (*Lunada Biomedical v. Nunez*
17 (2014) 230 Cal.App.4th 459, 486 (*Lunada*).)

18 The court rejects Blackman's argument that it can decline to award fees due to "special
19 circumstances." Awarding fees to a prevailing defendant is mandatory (*Ketchum v. Moses* (2001)
20 24 Cal.4th 1122, 1131 (*Ketchum*)), and the purposes of the fee-shifting statute are advanced by
21 awarding them here.

22 The court next considers Blackman's arguments concerning the amounts the defendants
23 seek.

24 In addition to the anti-SLAPP motion, defendants incurred fees opposing a temporary
25 restraining order and litigating Blackman's entitlement to proceed as a Doe plaintiff. Substack
26 also demurred to the complaint. The parties dispute whether the lodestar may or should include
27 fees for work on matters other than the anti-SLAPP motions themselves.

28

1 California cases establish that the defendants are entitled to fees “incurred in connection
2 with” the anti-SLAPP motion only. (*569 East County Boulevard LLC v. Backcountry Against the*
3 *Dump, Inc.* (2016) 6 Cal.App.5th 426, 433; see also *Six4Three, LLC v. Facebook, Inc.* (2025)
4 109 Cal.App.5th 635, 660 (*Six4Three*)). This does not include fees incurred, for example,
5 attacking service of process, preparing an answer, or research to support summary judgment
6 motions. (*Christian Research Institute v. Alnor* (2008) 165 Cal.App.4th 1315, 1325 (*Christian*
7 *Research*)). The court must evaluate whether the fee was incurred in “extricating [the defendant]
8 from a baseless lawsuit.” (*Wilkerson v. Sullivan* (2002) 99 Cal.App.4th 443, 446.) Defendants
9 rely on federal cases that are not binding on this court, and these cases are in significant tension
10 with binding California authority.

11 The court concludes that defendants’ fees incurred in opposing the TRO application,
12 preparing a demurrer (applicable to Substack only), and opposing the Doe motion are not
13 recoverable under § 425.16, subdivision (c)(1). Although these matters raised some of the same
14 issues as the anti-SLAPP motions, Defendants would have incurred them regardless of whether
15 the § 425.16 vehicle was available to them, and the results of these other motions were not
16 necessary to the court’s resolution of the anti-SLAPP motions, unlike the appeals in *Six4Three*.
17 However, defendants’ work on the sealing motions for the evidence used in the anti-SLAPP
18 motion is recoverable as necessary to the anti-SLAPP motions. (See *Six4Three*, supra, 109
19 Cal.App.5th at pp.660-661.) Time spent preparing the judgment that resulted from the anti-
20 SLAPP motion and preparing for the appeal of that judgment are recoverable.

21 Blackman also contends that each defendant’s anti-SLAPP motion was duplicative of the
22 others, and the court should award fees equivalent to only one motion by one defendant. The
23 court disagrees. Each defendant was separately represented, filed a separate motion, and asserts
24 different fees. Blackman cites no authority that each defendant in an anti-SLAPP must assert
25 novel arguments in order to recover their mandatory fees. Section 425.16, subdivision (c), is
26 designed to encourage defendants to hire counsel (*Lunada*, supra 230 Cal.App.4th at 486), a
27 purpose that would be undermined by Blackman’s position.

28

1 Finally, Blackman asserts that Substack's attorneys overbilled, and are seeking
2 unreasonable rates, and that Poulson's attorneys overbilled.

3 In awarding fees, the court must "begin[] with a touchstone or lodestar figure." (*Lunada*,
4 *supra*, (2014) 230 Cal.App.4th at 486.) A moving defendant bears the burden of establishing the
5 lodestar and its reasonableness. (*Christian Research, supra*, 165 Cal.App.4th at p. 1320.) The
6 lodestar is calculated "by multiplying the number of hours reasonably expended by the
7 reasonable hourly rate prevailing in the community for similar work." (*Id.*) In assessing what is
8 reasonable, "trial courts must carefully review attorney documentation of hours expended."
9 (*Ketchum, supra*, 24 Cal.4th 1122, 1132.) The court's job in ruling on fee requests is to evaluate
10 whether the amount of work is reasonable. When a fee request appears to be unreasonably
11 inflated the court can deny it altogether. (*Id.* at 1137 quoting *Serrano v. Unruh* (1982) 32 Cal.3d
12 621.)

13 The anti-SLAPP motions presented by defendants here were complex, the exhibits were
14 voluminous, Blackman raised numerous issues in opposition, and there were multiple
15 defendants. The court concludes that a reasonable number of hours in this case is much higher
16 than in a typical anti-SLAPP motion. In addition, the early correspondence and litigation
17 between the parties indicated that the case would be hard fought, and that Blackman valued the
18 case in the multi-millions. Although the fees for the early skirmishes between the parties are not
19 recoverable, as discussed above, this context demonstrates that it was largely reasonable for
20 defendants to take the case seriously and expend a commensurately larger number of hours
21 ensuring their anti-SLAPP motions would be successful. With these conclusions in mind, the
22 court turns to each defendant's hours and rates.

23 Substack's counsel's rates are reasonable. Hiring a large law firm to defend against a
24 multi-million dollar suit was a reasonable choice. The Baskin Declaration adequately
25 substantiates the reasonableness of these rates in the San Francisco legal market.

26 The court sets the "reasonable hours" element of the lodestar calculation for Substack's
27 motion at 250 hours. Substack seeks recovery of fees that do not relate to its anti-SLAPP motion,
28 and some of its counsel's billing entries are broad enough that the court cannot discern whether

1 they are related to the anti-SLAPP motion or not. Others are block billing where numerous tasks
2 are aggregated, some of which are recoverable and some not. The court has largely excluded
3 those entries but has reduced some of them, and has excluded some other entries that are
4 insufficiently justified or appear extraneous. By the court's rough calculation, 299.75 hours of
5 Substack's counsel's time fairly relate to the anti-SLAPP motion; the attached pdf (Exhibit A)
6 shows the source of that calculation. The court has further reduced the hours to 250 to reflect
7 unnecessary coordination and duplication in Substack's counsel's billing. The blended rate for
8 all 592.50 hours that Substack seeks is \$844.41 per hour. The court applies that blended rate to
9 250 hours for a total award of \$211,102.50 in fees. Both sides will no doubt quibble with the
10 court's line-drawing in the attached pdf and in this order; the aggregates set out above reflect the
11 court's view of what is reasonable here.

12 Substack also seeks costs. The court grants its cost request except as to miscellaneous
13 costs and transcript costs, which it has withdrawn. (See Reply, fn. 4.) The court finds legal
14 research costs to be an allowable element of attorneys' fees here. (See *Plumbers & Steamfitters,*
15 *Local 290 v. Duncan* (2007) 157 Cal.App.4th 1083, 1099.) Total costs awarded are \$14,706.60.

16 For Poulson, Blackman challenges only the number of hours billed and not the rate. The
17 court finds the number of hours billed to be reasonable and supported. As noted, this motion was
18 complex and Blackman raised numerous claims. The court awards Poulson \$145,362.42, after
19 subtracting out work on the Doe briefing and the TRO.

20 For Tech Inquiry, Blackman does not challenge the rate or the hours billed. He seeks to
21 exclude work done on the Doe briefing and the TRO, which the court finds appropriate. Tech
22 Inquiry is awarded \$40,280.

23
24 DATED: 8/8/2015


The Honorable Christine Van Aken
Judge of the Superior Court

EXHIBIT A

Fees Billed through April 17, 2025

Date	Name	Billed Hrs	Billed Amt	Narrative
9/18/2024	Bal, Colleen	0.4	\$553.00	Attention to demand letter and research; confer re same
9/19/2024	Baskin, Joshua A.	0.4	\$437.50	Strategize regarding response to demand
9/21/2024	Bal, Colleen	0.3	\$414.75	Correspond re research issues
9/21/2024	Baskin, Joshua A.	0.8	\$875.00	strategize about response to city attorney
9/25/2024	Evelyn, Rasheed	0.8	\$399.00	Review correspondence regarding plaintiff's claims, applicable legal defenses, and statutory requirements imposed on defendant
9/25/2024	Evelyn, Rasheed	1.8	\$897.75	Review case law regarding applicability of Section 230 defenses for platforms
9/26/2024	Evelyn, Rasheed	0.8	\$399.00	Draft preliminary research memo for team and assess further research avenues to address remaining issues
9/26/2024	Evelyn, Rasheed	3.9	\$1,945.12	Research case law relating to Section 230 defenses for platforms
9/27/2024	Evelyn, Rasheed	0.6	\$299.25	Draft memo regarding Section 230 immunity and its applicability to the publication of public records
9/27/2024	Evelyn, Rasheed	2.4	\$1,197.00	Conduct legal research regarding Section 230 immunity for platforms
10/3/2024	Baskin, Joshua A.	0.4	\$437.50	Correspondence re service
10/4/2024	Margo, Benjamin D.	0.3	\$312.37	Communications with J. Baskin re possible preliminary injunction motion
10/4/2024	Baskin, Joshua A.	0.9	\$984.37	Review complaint and strategize regarding potential motion for preliminary injunction
10/4/2024	Evelyn, Rasheed	1.2	\$598.50	Research standing requirements for causes of actions in plaintiff's filing to determine viable claims
10/4/2024	Evelyn, Rasheed	0.8	\$399.00	Review documents related to plaintiff's filing
10/6/2024	Wakefield, Tom	3.9	\$4,163.25	Analyze complaint and arguments for dismissal, including w/r/t striking anonymous complaint
10/6/2024	Evelyn, Rasheed	2.2	\$1,097.25	Draft document and email correspondence regarding standing requirements for plaintiff's cause of action
10/6/2024	Evelyn, Rasheed	6.1	\$3,042.37	Research standing requirements for plaintiff's causes of action

10/7/2024	Margo, Benjamin D.	0.7	\$728.87	Meet with J. Baskin and client re planned demurrer, response to anonymous nature of complaint, and possible preliminary injunction motion
10/7/2024	Baskin, Joshua A.	0.9	\$984.37	Strategize regarding response to complaint/motion
10/7/2024	Wakefield, Tom	1.9	\$2,028.25	Send analysis/research of Blackman's chances of proceeding pseudonymously, and correspond with team re same
10/7/2024	Evelyn, Rasheed	0.4	\$199.50	Draft email memo on pseudonymous filing research
10/7/2024	Evelyn, Rasheed	3.2	\$1,596.00	Conduct research on pseudonymous filing and whether there is preemption for third-party disclosure
10/7/2024	Evelyn, Rasheed	1.4	\$698.25	Conduct follow-up research on requirements for pseudonymous filing
10/7/2024	Vargas, Christopher	0.2	\$65.62	Retrieve case docket and order
10/8/2024	Evelyn, Rasheed	1.4	\$698.25	Draft joint stipulated motion related to the extension for responsive pleading
10/8/2024	Evelyn, Rasheed	2.3	\$1,147.12	Research requirements for pseudonymous filings with prior disclosure of sensitive information
10/8/2024	Evelyn, Rasheed	1.1	\$548.62	Review precedent filings for stipulated motions
10/9/2024	Margo, Benjamin D.	0.9	\$937.12	Communication with J. Baskin re Section 230 issue; edit draft stipulation to extend time to answer the complaint
10/9/2024	Wakefield, Tom	1.2	\$1,281.00	Continue researching, and begin drafting, argument that plaintiffs proceeded improperly by not seeking leave to sue anonymously
10/9/2024	Evelyn, Rasheed	1.4	\$698.25	Review court rules and CA civil code related to stipulated motions
10/9/2024	Evelyn, Rasheed	1.2	\$598.50	Revise draft of joint stipulated motion
10/10/2024	Wakefield, Tom	1.6	\$1,708.00	Continue drafting argument re striking complaint for violating CA law
10/10/2024	Evelyn, Rasheed	2.3	\$1,147.12	Research case law that relates to Section 230 as an affirmative defense to plaintiff's claims
10/10/2024	Margo, Benjamin D.	0.6	\$624.75	Legal research on potential anti-SLAPP motion
10/11/2024	Wakefield, Tom	2.8	\$2,989.00	Research cases in which parties sought to proceed anonymously in litigation involving already-published news articles, or otherwise implicated such 1st A. concerns

10/11/2024	Wakefield, Tom	3.1	\$3,309.25	Research unfavorable caselaw under order to head off arguments in briefing	
10/14/2024	Evelyn, Rasheed	1.7	\$847.87	Complete research on pseudonymous filing requirements based on public disclosure of prior sealed convictions	
10/14/2024	Evelyn, Rasheed	0.7	\$349.12	Draft email memo and research chart regarding pseudonymous filings and Section 230 affirmative defenses	
10/14/2024	Evelyn, Rasheed	2.9	\$1,446.37	Complete research on Section 230 affirmative defenses relating to plaintiff's claims	✓
10/15/2024	Evelyn, Rasheed	0.4	\$199.50	Devise chart detailing filing deadlines based on court rules in coordination with calendaring department	✓
10/16/2024	Margo, Benjamin D.	1.8	\$1,874.25	Draft letter to San Francisco City Attorney in response to their demand letter; communication with J. Baskin re same	
10/17/2024	Baskin, Joshua A.	0.4	\$437.50	Discuss strategy with Amazon	✓
10/21/2024	Evelyn, Rasheed	3.3	\$1,645.87	Research case law surrounding standard for anti-SLAPP motions, including the definition of "matters of public concern"	✓
10/21/2024	Wakefield, Tom	0.4	\$427.00	Analyze research into whether to file anti-SLAPP motion	✓
10/22/2024	Evelyn, Rasheed	3.4	\$1,695.75	Conduct research and draft memo on public interest standard for anti-SLAPP motions	✓
10/23/2024	Margo, Benjamin D.	0.2	\$208.25	Edit draft stipulation to extend time to move to dismiss	✓
10/23/2024	Evelyn, Rasheed	0.9	\$448.87	Revise draft of joint stipulation motion to align with new timeline for the case	✓
10/29/2024	Wakefield, Tom	0.3	\$320.25	Revise stipulation to extend time to respond to complaint	✓
10/29/2024	Evelyn, Rasheed	0.4	\$199.50	Revise and send draft stipulation to co-counsel	✓
10/29/2024	Evelyn, Rasheed	2.7	\$1,346.62	Research co-counsel's background, expertise, and litigation experience to determine how best to advocate for client and implement simultaneous defense strategies	
10/30/2024	Wakefield, Tom	1.6	\$1,708.00	Prepare for and sync re stipulation and demurrer, and revise same	
10/30/2024	Wakefield, Tom	0.4	\$427.00	Send update on SF Chronicle article, and consider implications for demurrer	
10/30/2024	Evelyn, Rasheed	0.8	\$399.00	Meet with team to discuss litigation strategy for the case and delegate research and writing duties for upcoming brief	

10/30/2024	Evelyn, Rasheed	1.4	\$698.25	Research links between domestic violence disputes and matters of public concern	✓
10/30/2024	Margo, Benjamin D.	1.2	\$1,249.58	Plan for potential demurrer and/or anti-SLAPP motions; call with T. Wakefield and R. Evelyn re same; legal research re same	1/2
10/31/2024	Wakefield, Tom	2.8	\$2,989.00	Analyze merits of an anti-SLAPP motion, and consider sequencing of demurrer and anti-SLAPP	✓
10/31/2024	Evelyn, Rasheed	0.9	\$448.87	Research effect of filing anti-SLAPP motion on discovery	
11/1/2024	Evelyn, Rasheed	0.9	\$448.87	Research on the impact of filing deadline for demurrer based on the filing of an anti-SLAPP motion	✓
11/1/2024	Margo, Benjamin D.	0.6	\$624.75	Plan for potential anti-SLAPP motion; call with counsel for co-defendant re same, with T. Wakefield	✓
11/1/2024	Wakefield, Tom	3.3	\$3,522.75	Finish drafting pseudonym portion of briefing	
11/1/2024	Wakefield, Tom	0.4	\$427.00	Confer with EFF re strategy	✓
11/4/2024	Wakefield, Tom	0.4	\$427.00	Finalize stipulation to extend briefing and confer with same re various lawyers	✓
11/4/2024	Wakefield, Tom	1.1	\$1,174.25	Research cases for the proposition that one cannot suppress, or anonymize, speech that has already occurred, and revise briefing to incorporate same	
11/4/2024	Evelyn, Rasheed	3	\$1,496.25	Research case law concerning the intellectual property exception for Section 230	
11/4/2024	Evelyn, Rasheed	0	\$0.00	Research case law where Section 230 and first amendment defenses are incorporated into anti-SLAPP motions	✓
11/4/2024	Evelyn, Rasheed	0.5	\$249.37	Revise and coordinate filing of joint stipulated motion	
11/5/2024	Margo, Benjamin D.	0.4	\$416.50	Call with T. Wakefield re draft briefing in support of anti-SLAPP motion or demurrer	✓
11/5/2024	Wakefield, Tom	0.5	\$533.75	Sync re strategy for demurrer / anti-SLAPP, and correspond with opposing counsel re same	1/2
11/5/2024	Wakefield, Tom	1.1	\$1,174.25	Finish briefing portions of demurrer	
11/5/2024	Evelyn, Rasheed	0	\$0.00	Begin draft of background section for upcoming demurrer	
11/5/2024	Evelyn, Rasheed	0	\$0.00	Review draft of argument section for motion to dismiss and provide feedback for team	

11/5/2024	Evelyn, Rasheed	0.7	\$349.12	Research case law to determine whether domestic violence can be considered a public matter of concern	✓
11/6/2024	Margo, Benjamin D.	2.3	\$2,394.87	Communication with T. Wakefield re possible anti-SLAPP motion and demurrer; call with T. Wakefield and counsel for co-defendant AWS re same; edit draft section of brief on Plaintiff's failure to satisfy standard to proceed pseudonymously	
11/6/2024	Wakefield, Tom	3	\$3,202.50	Research grounds for First Amendment defense and "public issues" under SLAPP	✓
11/6/2024	Wakefield, Tom	2.2	\$2,348.50	Prepare for and lead sync with AWS's counsel re strategy	✓
11/6/2024	Wakefield, Tom	1.6	\$1,708.00	Draft overview of strategy on motion papers for client	✓
11/6/2024	Evelyn, Rasheed	2	\$997.50	Draft background section of demurrer	
11/6/2024	Evelyn, Rasheed	1.8	\$897.75	Research case law to determine whether domestic violence issues are considered public matters of concern	✓
11/6/2024	Evelyn, Rasheed	0	\$0.00	Revise and prepare joint stipulated motion for filing	
11/7/2024	Wakefield, Tom	0.4	\$427.00	Advise on whether to respond to city attorney's letter	
11/7/2024	Wakefield, Tom	1.1	\$1,174.25	Continue drafting demurrer	
11/7/2024	Margo, Benjamin D.	2.2	\$2,290.75	Legal research re anti-SLAPP, with R. Evelyn; draft portion of anti-SLAPP brief	✓
11/7/2024	Evelyn, Rasheed	3.5	\$1,745.62	Research the application of intellectual property exception within Section 230 to right of publicity claims	
11/8/2024	Wakefield, Tom	3.1	\$3,309.25	Continue drafting anti-SLAPP briefing, and sync with B. Margo on progress with briefing, research, etc.	✓
11/8/2024	Wakefield, Tom	1.3	\$1,387.75	Analyze research into potential applicability of (e)(4) of anti-SLAPP statute, and advise client re same	✓
11/8/2024	Margo, Benjamin D.	0.6	\$624.75	Prepare Anti-SLAPP motion; call with T. Wakefield re same	✓
11/10/2024	Margo, Benjamin D.	0.5	\$520.62	Draft anti-SLAPP motion	✓
11/10/2024	Wakefield, Tom	1.9	\$2,028.25	Continue researching/drafting anti-SLAPP brief, including section re public forums	✓
11/11/2024	Wakefield, Tom	1.3	\$1,387.75	Research and draft portions of anti-SLAPP brief	✓
11/11/2024	Evelyn, Rasheed	1.5	\$748.12	Draft background section of motion to dismiss for team review	

11/12/2024	Wakefield, Tom	8	\$8,540.00	Research, devise strategy for, sync re and draft opposition to plaintiff's TRO
11/12/2024	Malferrari, Candida R.	0	\$0.00	Review joint stipulation to extend time
11/12/2024	Margo, Benjamin D.	6	\$6,247.50	Analyze TRO motion filed by Plaintiff, in coordination with J. Baskin, T. Wakefield, and R. Evelyn; draft sections of opposition to TRO including re Section 230 and the First Amendment; legal research re same; fact research re same; coordinate with counsel for co-defendants re same
11/12/2024	Baskin, Joshua A.	3.1	\$3,390.62	Revise opposition to TRO
11/12/2024	Evelyn, Rasheed	0	\$0.00	Work with staff to coordinate remote appearances for attorneys and schedule court reporter for motion hearing
11/12/2024	Evelyn, Rasheed	0.9	\$448.87	Research procedure for filing motions under conditional seal
11/12/2024	Evelyn, Rasheed	3.6	\$1,795.50	Research irreparable harm standard for temporary restraining orders; analyze interplay between irreparable harm and prior publication of defamatory content
11/12/2024	Evelyn, Rasheed	0	\$0.00	Meet with J. Baskin, T. Wakefield, and B. Margo to discuss legal strategy for opposing temporary restraining order
11/12/2024	Evelyn, Rasheed	0	\$0.00	Assist attorneys in revising draft opposition motion and complete cite checks for attorneys
11/12/2024	Evelyn, Rasheed	0	\$0.00	Work with paralegal staff to revise joint stipulated motion for formatting compliance
11/12/2024	McNamara, Mariana	4.4	\$1,963.50	Verify and conform citations in opposition to application for order to show cause and temporary restraining order
11/12/2024	McNamara, Mariana	0.5	\$223.12	Draft case pleading template
11/13/2024	Fritz, Tracy	0	\$0.00	Extract and download cases from brief
11/13/2024	Margo, Benjamin D.	3.8	\$3,956.75	Edit draft opposition to Plaintiff's TRO motion, in coordination with J. Baskin and T. Wakefield; prepare talking points for T. Wakefield for TRO motion hearing; case law research re same
11/13/2024	Evelyn, Rasheed	0.3	\$149.62	Draft email correspondence to co-counsel on revised joint stipulation
11/13/2024	Evelyn, Rasheed	0.3	\$149.62	Work with team to moot hearing on temporary restraining order
11/13/2024	Evelyn, Rasheed	1.9	\$947.62	Research deadline and civil procedure for requesting publication of an unpublished

				opinion; research exemplars for draft motion
11/13/2024	Evelyn, Rasheed	0.6	\$299.25	Review and complete final revisions of opposition to temporary restraining order
11/13/2024	Wakefield, Tom	0.3	\$320.25	Confer re opposition to Doe motion
11/13/2024	Wakefield, Tom	4.7	\$5,017.25	Prepare for and argue opposition to TRO
11/14/2024	Wakefield, Tom	0.6	\$640.50	Prepare for and sync w/r/t plan for upcoming briefing
11/14/2024	Wakefield, Tom	1.3	\$1,387.75	Read, summarize, and begin drafting opposition to Doe's motion to proceed anonymously
11/14/2024	Evelyn, Rasheed	1.4	\$698.25	Revise background section in support of opposition to motion to proceed anonymous
11/14/2024	Evelyn, Rasheed	0.7	\$349.12	Draft memo on the process for filing a Request for Publication
11/14/2024	Evelyn, Rasheed	0.5	\$249.37	Meet with team to discuss assignments for draft demurrer
11/14/2024	Evelyn, Rasheed	0.6	\$299.25	Research statistics surrounding gender abuse in the technology industry in support of opposition motion
11/14/2024	Margo, Benjamin D.	1.7	\$1,770.12	Plan letter brief to Court of Appeal to request publication of Nelson v. Bridgers in support of Anti-SLAPP motion, with T. Wakefield (1 hour); review Plaintiff's motion to appear under pseudonym, and plan response with T. Wakefield and R. Evelyn (.7 hours)
11/15/2024	Evelyn, Rasheed	2.9	\$1,446.37	Draft Request for Publication letter for Nelson v. Bridgers opinion
11/15/2024	Evelyn, Rasheed	1	\$498.75	Research deadlines for Requesting Publication of Unpublished Opinions under California Rules of Court
11/15/2024	Wakefield, Tom	1.1	\$1,174.25	Draft opposition to motion to proceed anonymously
11/15/2024	Margo, Benjamin D.	0.6	\$624.75	Outline letter to Court of Appeal requesting publication of Nelson v. Bridgers in support of Anti-SLAPP motion
11/17/2024	Wakefield, Tom	7.1	\$7,579.25	Continue researching and drafting opposition to Doe motion
11/17/2024	Margo, Benjamin D.	0.6	\$624.75	Edit draft letter brief re publication of Nelson v. Bridgers, in support of Anti-SLAPP motion

1 hr

✓

✓

✓

✓

11/18/2024	Margo, Benjamin D.	2.8	\$2,915.50	Edit and prepare for filing letter brief to California Court of Appeal requesting publication of Nelson v. Bridgers opinion in support of Anti-SLAPP motion, in coordination with T. Wakefield and R. Evelyn (.8 hrs); draft Section 230 argument section for Anti-SLAPP motion (2 hrs)	✓
11/18/2024	Evelyn, Rasheed	1.5	\$748.12	Revise draft of Request for Publication	✓
11/18/2024	Evelyn, Rasheed	0.4	\$199.50	Research case law relating to protections for speech concerning domestic violence under California's anti-SLAPP statute	✓
11/18/2024	Wakefield, Tom	1.1	\$1,174.25	Revise letter seeking publication of Nelson v. Bridgers	✓
11/18/2024	Wakefield, Tom	4.8	\$5,124.00	Draft sections of anonymity briefing w/r/t prejudice to plaintiffs and to the public interest	
11/19/2024	Wakefield, Tom	0.3	\$320.25	Oversee filing of letter brief re publication of Bridgers case	✓
11/19/2024	Wakefield, Tom	4.1	\$4,376.75	Draft portions of opposition brief w/r/t background, legal standard, and procedural history	
11/19/2024	Wakefield, Tom	0.4	\$427.00	Sync re First Amendment argument for anti-SLAPP	✓
11/19/2024	Wakefield, Tom	0.4	\$427.00	Research whether arrest records constitute "sensitive and highly personal matters"	✓
11/19/2024	Evelyn, Rasheed	1.5	\$748.12	Revise and file Request for Publication in support of upcoming opposition motion	
11/19/2024	Evelyn, Rasheed	0.3	\$149.62	Meet and confer with team to discuss draft of demurrer	
11/19/2024	Evelyn, Rasheed	1	\$498.75	Research civil procedure for filing Request for Publication of unpublished case	
11/19/2024	Margo, Benjamin D.	3.5	\$3,644.37	Draft First Amendment section of Anti-SLAPP brief; legal research re same; call with T. Wakefield re same	✓
11/19/2024	McNamara, Mariana	0.5	\$223.29	Review and edit publication letter	
11/20/2024	Margo, Benjamin D.	3.9	\$4,060.87	Draft section of opposition brief to Plaintiff's motion to proceed anonymously; edit draft opposition brief, with T. Wakefield	
11/20/2024	Wakefield, Tom	0	\$0.00	Draft introduction to opposition to pseudonym motion, and revise sections drafted by B. Margo	
11/20/2024	Evelyn, Rasheed	1.2	\$598.50	Review draft of opposition to plaintiff's motion to file pseudonymously	
11/21/2024	Baskin, Joshua A.	2.3	\$2,515.62	Revise opposition to motion to proceed anonymously	

11/21/2024	Wakefield, Tom	0	\$0.00	Revise opposition to Doe motion in keeping with J. Baskin's comments
11/21/2024	Evelyn, Rasheed	1	\$498.75	Research case law to use as persuasive authority in support of opposition to plaintiff's motion to file pseudonymously
11/21/2024	Margo, Benjamin D.	1.8	\$1,874.25	Draft Anti-SLAPP motion
11/22/2024	Baskin, Joshua A.	1.1	\$1,203.12	Edit opposition to motion to proceed anonymously
11/22/2024	Wakefield, Tom	2.4	\$2,562.00	Finalize first draft of pseudonym opposition, including by responding to team comments, and share same with client
11/22/2024	Evelyn, Rasheed	0.9	\$448.87	Research procedure for filings briefs under seal in state court
11/22/2024	Evelyn, Rasheed	2.8	\$1,396.50	Research case law to use as persuasive authority in support of opposition to plaintiff's motion to file pseudonymously
11/22/2024	Margo, Benjamin D.	0.2	\$208.25	Prepare for demurrer, in coordination with J. Baskin and T. Wakefield
11/24/2024	Evelyn, Rasheed	5.2	\$2,593.50	Research case law to use as persuasive authority in support of opposition to plaintiff's motion to file pseudonymously
11/25/2024	Wakefield, Tom	2.6	\$2,775.50	Advise on sealing declaration, review/respond to JDG's additional comments, and send client update with redline showing today's changes
11/25/2024	Evelyn, Rasheed	1.9	\$947.62	Draft declaration in support of opposition motion contesting plaintiff's request to file pseudonymously
11/25/2024	Evelyn, Rasheed	1.6	\$798.00	Research procedure for filing opposition motion conditionally under seal
11/26/2024	Margo, Benjamin D.	3.7	\$3,852.62	Draft anti-SLAPP motion
11/26/2024	Wakefield, Tom	2	\$2,135.00	Oversee finalization of opposition papers
11/26/2024	Evelyn, Rasheed	0	\$0.00	Draft motion to seal and declaration in support of opposition motion
11/26/2024	McNamara, Mariana	4.1	\$1,829.62	Verify and conform citations in opposition to motion to proceed with fictitious name
11/26/2024	Baskin, Joshua A.	2.2	\$2,406.25	Revise opposition to motion to proceed anonymously
11/27/2024	Wakefield, Tom	4.4	\$4,697.00	Revise brief to incorporate final edits, review sealing motion and associated papers, and edit declarations
11/27/2024	Evelyn, Rasheed	2.7	\$1,346.62	Revise draft opposition and declaration to contest plaintiff's motion for pseudonymity

12/3/2024	Evelyn, Rasheed	0.5	\$249.37	Research case law to support Section 230 defense to plaintiff's claims in anti-SLAPP and demurrer motions	✓
12/3/2024	Evelyn, Rasheed	0.9	\$448.87	Draft anti-SLAPP and demurrer motions	
12/3/2024	Evelyn, Rasheed	0.5	\$249.37	Research filing requirements and supporting papers needed for demurrer and anti-SLAPP motions	
12/4/2024	Wakefield, Tom	0.2	\$213.50	Advise on finalizing papers with team and JDG	
12/4/2024	Baskin, Joshua A.	3.4	\$3,718.75	Revise anti-slapp motion and supporting papers	✓
12/4/2024	Evelyn, Rasheed	2.1	\$1,047.37	Draft supporting documents for anti-SLAPP, demurrer and sealing motions	1/2
12/4/2024	Margo, Benjamin D.	0.4	\$416.50	Adapt anti-SLAPP motion into draft demurrer	
12/5/2024	Margo, Benjamin D.	5.1	\$5,310.37	Revise draft Anti-SLAPP motion and demurrer, with ancillary documents including draft declaration, in coordination with J. Baskin and R. Evelyn	1/2
12/5/2024	Wakefield, Tom	0.9	\$960.75	Sync with co-counsel re strategy for SLAPP	✓
12/5/2024	Wakefield, Tom	1.1	\$1,174.25	Read reply in support of Doe motion and make notes on counter-arguments to same	
12/5/2024	Baskin, Joshua A.	2.1	\$2,296.87	Revise demurrer and supporting papers	
12/5/2024	Evelyn, Rasheed	2.1	\$1,047.37	Revise drafts of supporting documents for demurrer and anti-SLAPP motions	1/2
12/5/2024	Evelyn, Rasheed	0.7	\$349.12	Review declaration for conformity with co-defendants' assertions and arguments	
12/6/2024	Wakefield, Tom	0.9	\$960.75	Review final SLAPP and demurrer papers before filing	1/2
12/6/2024	Wakefield, Tom	1.2	\$1,281.00	Read cases cited in plaintiff's reply brief	
12/6/2024	Margo, Benjamin D.	1.4	\$1,457.75	Finalize and file Anti-SLAPP motion, demurrer, declaration in support of both motions, and sealing motion, with R. Evelyn and J. Baskin	1/2
12/6/2024	Baskin, Joshua A.	0.9	\$984.37	Final review of anti-slapp motion and demurrer	1/2
12/6/2024	Evelyn, Rasheed	1.7	\$847.87	Revise drafts of anti-SLAPP, demurrer and joinder motions including supporting documents for filing	1/2
12/6/2024	McNamara, Mariana	8.3	\$3,703.87	Verify and conform citations in demurrer and anti-SLAPP motion and prepare supporting documents for same	1/2

12/6/2024	Gutierrez, Tanya	0	\$0.00	Pull all the cases cited in the attached brief - 13 cases
12/7/2024	Wakefield, Tom	2.1	\$2,241.75	Continue reading cases cited in briefing and preparing talking points for Doe hearing
12/8/2024	Wakefield, Tom	4.1	\$4,376.75	Draft notes on distinguishing features of plaintiff's cases and begin drafting opening statement
12/9/2024	Wakefield, Tom	0.6	\$640.50	Continue preparing talking points for hearing
12/10/2024	Evelyn, Rasheed	0.4	\$199.50	Research procedures for contesting court's tentative ruling on a motion
12/11/2024	Baskin, Joshua A.	1.9	\$2,078.12	Prepare for argument on motion to proceed as a Doe
12/11/2024	Wakefield, Tom	3.2	\$3,416.00	Read tentative, prepare talking points for hearing, and moot hearing with J. Baskin
12/11/2024	Margo, Benjamin D.	1.3	\$1,353.62	Review tentative order on Plaintiff's motion to proceed as a John Doe; prepare for hearing re same; prepare for reply briefing on Anti-SLAPP motion and demurrer
12/12/2024	Baskin, Joshua A.	0	\$0.00	Attend hearing on motion to proceed as a Doe
12/12/2024	Wakefield, Tom	2.3	\$2,455.25	Prepare for and argue Doe motion before J. Quinn
12/12/2024	Evelyn, Rasheed	0	\$0.00	Attend hearing on Plaintiff's Motion to Proceed Under A Fictitious Name
12/13/2024	Baskin, Joshua A.	0	\$0.00	Attention to sealing issues; reply ISO motion to seal
12/13/2024	Wakefield, Tom	0.3	\$320.25	Review order entering tentative and strategize re briefing schedule
12/13/2024	Evelyn, Rasheed	0.9	\$448.87	Draft Reply for Motion to Seal in support of Opposition to Plaintiff's Request to Proceed under a Fictitious Name
12/13/2024	Evelyn, Rasheed	1.3	\$648.37	Research case law in support of Reply for Motion to Seal
12/16/2024	Baskin, Joshua A.	0.9	\$984.37	Correspondence regarding motion to seal
12/16/2024	Wakefield, Tom	0	\$0.00	Discuss strategy for briefing schedule w/r/t sealing
12/16/2024	Wakefield, Tom	0	\$0.00	Review papers filed by First Amendment Coalition & FIRE
12/16/2024	Bal, Colleen	0.2	\$276.50	Confer re status and arguments
12/17/2024	Baskin, Joshua A.	0	\$0.00	Correspondence on motions to seal and substituting Does
12/17/2024	Evelyn, Rasheed	0	\$0.00	Strategize with team regarding Plaintiff's response to Motions to Seal
12/18/2024	Evelyn, Rasheed	0	\$0.00	Review joint stipulation regarding motions to seal

12/18/2024	Wakefield, Tom	0.5	\$533.75	Draft stipulation w/r/t briefing on merits and sealing, and review recent filings	
12/19/2024	Baskin, Joshua A.	0.4	\$437.50	Attention to sealing issues and case schedule	✓
12/20/2024	Wakefield, Tom	0	\$0.00	Review court's order re sealing motions and briefing schedule, and confer with team re next steps	
12/20/2024	Evelyn, Rasheed	0.3	\$149.62	Research rules regarding procedures for rescheduling hearing in SF Superior Court	
12/20/2024	Evelyn, Rasheed	0.7	\$349.12	Revise prior demurrer and anti-SLAPP pleadings to reflect parties' revised agreement	1/2
12/21/2024	Wakefield, Tom	1.7	\$1,814.75	Review Blackman's oppositions to demurrer and anti-SLAPP briefs, and get team started on replies to same	1/2
12/22/2024	Evelyn, Rasheed	3.1	\$1,546.12	Draft memo in support of reply brief for demurrer and anti-SLAPP motions	1/2
12/23/2024	Margo, Benjamin D.	4.8	\$4,998.00	Draft reply in further support of anti-SLAPP motion; case law research in support of same	✓
12/23/2024	Evelyn, Rasheed	2.8	\$1,396.50	Draft memo in support of reply brief for demurrer and anti-SLAPP motions	1/2
12/23/2024	Wakefield, Tom	0	\$0.00	Review plaintiffs' stipulations and notice of related case	
12/24/2024	Margo, Benjamin D.	0.4	\$416.50	Draft reply brief in further support of anti-SLAPP motion	✓
12/24/2024	Baskin, Joshua A.	0.8	\$875.12	Argue ex parte regarding hearing dates	
12/26/2024	Margo, Benjamin D.	0.3	\$312.37	Plan reply in further support of anti-SLAPP motion; communication with J. Baskin re same	✓
12/26/2024	Evelyn, Rasheed	0.3	\$149.62	Draft Notice of Joinder in support of opposition to plaintiff's motion to seal	✓
12/27/2024	Baskin, Joshua A.	0	\$0.00	Revise reply in support of motion to seal	
12/27/2024	Wakefield, Tom	0	\$0.00	Review sealing replies filed by the parties	
12/31/2024	Wakefield, Tom	0	\$0.00	Review/revise opposition to notice of related case	
1/2/2025	Evelyn, Rasheed	0	\$0.00	Review filings in preparation for hearing on motions to seal	
1/3/2025	Baskin, Joshua A.	0.4	\$477.75	Review tentative orders on motions to seal	✓
1/3/2025	Wakefield, Tom	0.4	\$472.50	Review tentatives re sealing and weigh in on whether to contest	✓
1/3/2025	Evelyn, Rasheed	0	\$0.00	Review court's tentative order related to plaintiff's motion to seal	

1/6/2025	Evelyn, Rasheed	0	\$0.00	Confer with J. Baskin regarding follow-up actions required to comply with plaintiff's motion to seal	
1/8/2025	Evelyn, Rasheed	0	\$0.00	Confer with case team regarding strategy for upcoming anti-SLAPP and demurrer motions	
1/8/2025	Wakefield, Tom	0	\$0.00	Prepare for and join strategy meeting re reply brief	
1/8/2025	Lombardo, Sophie	0.6	\$385.87	Coordinate with R.Evelyn on onboarding tasks and review materials in preparation of team transition meeting	
1/12/2025	Lombardo, Sophie	2.4	\$1,543.50	Draft document summarizing all authorities cited in plaintiff's opposition to anti-SLAPP motion	✓
1/13/2025	Lombardo, Sophie	7.6	\$4,887.75	Draft document summarizing all authorities cited in plaintiff's opposition to anti-SLAPP motion	✓
1/13/2025	Margo, Benjamin D.	0.4	\$455.00	Plan meet and confer with Plaintiff and co-Defendants re effects of court's sealing order	✓
1/14/2025	Lombardo, Sophie	0.4	\$257.25	Draft document summarizing all authorities cited in plaintiff's opposition to anti-SLAPP motion	✓
1/14/2025	Wakefield, Tom	0	\$0.00	Read opposition and begin strategizing re arguments in reply brief	
1/15/2025	Lombardo, Sophie	0	\$0.00	Meet with B.Margo to discuss research on response to plaintiff's opposition	
1/15/2025	Lombardo, Sophie	0	\$0.00	Review plaintiff's opposition to Substack's anti-SLAPP motion	
1/15/2025	Lombardo, Sophie	6.3	\$4,051.69	Draft document summarizing all authorities cited in plaintiff's opposition to anti-SLAPP motion	✓
1/15/2025	Margo, Benjamin D.	0.4	\$455.00	Call with S. Lombardo re opposition briefs and planning reply brief in further support of anti-SLAPP motion	✓
1/16/2025	Fritz, Tracy	0	\$0.00	Download cases from briefs and send as PDF's	
1/16/2025	Wakefield, Tom	0	\$0.00	Advise on arguments for reply	
1/16/2025	Margo, Benjamin D.	0.4	\$455.00	Draft outline for reply in further support of anti-SLAPP motion and demurrer; case law research in support of same, in coordination with S. Lombardo	✓
1/17/2025	Wakefield, Tom	2.4	\$2,835.00	Prepare for and lead call w/r/t arguments in reply	1/2
1/17/2025	Baskin, Joshua A.	1.8	\$2,149.87	Review oppositions to SLAPP and demurrer and strategize regarding replies	1/2

1/17/2025	Margo, Benjamin D.	0.8	\$910.00	Plan reply briefs in further support of anti-SLAPP motion and demurrer, with J. Baskin, T. Wakefield and S. Lombardo	1/2
1/17/2025	Lombardo, Sophie	0.4	\$257.25	Coordinate with team on reply to plaintiff's opposition	1/2
1/17/2025	Lombardo, Sophie	2.4	\$1,543.51	Draft outline and initial draft of reply to plaintiff's opposition	1/2
1/18/2025	Wakefield, Tom	3.8	\$4,488.75	Read new cases cited in opp'ns to prepare reply and for argument	1/2
1/19/2025	Wakefield, Tom	3.4	\$4,016.25	Continue reading cases cited in opposition and drafting thoughts for reply brief/argument	1/2
1/19/2025	Lombardo, Sophie	1.1	\$707.44	Draft reply to plaintiff's opposition	1/2
1/21/2025	Wakefield, Tom	0	\$0.00	Review progress on reply briefs and research related to same, and read ex parte papers re prior briefing	
1/21/2025	Margo, Benjamin D.	0.2	\$227.50	Communications with T. Wakefield and Plaintiff re Plaintiff's motion to strike his initial oppositions to anti-SLAPP motions and Substack's demurrer	1/2
1/22/2025	Lombardo, Sophie	6.4	\$4,116.00	Draft reply to plaintiff's opposition	1/2
1/22/2025	Lombardo, Sophie	0.4	\$257.25	Attend coordination call with B.Margo regarding draft reply	1/2
1/22/2025	Baskin, Joshua A.	0.8	\$955.50	Correspondence re journalist	
1/22/2025	Margo, Benjamin D.	5.9	\$6,711.25	Draft reply brief in further support of anti-SLAPP motion; case law research in support of same	✓
1/23/2025	Lombardo, Sophie	0.9	\$578.81	Incorporate first round of edits to draft reply	1/2
1/23/2025	Lombardo, Sophie	0	\$0.00	Attend coordination call with B.Margo to discuss draft revisions	
1/23/2025	Margo, Benjamin D.	4.9	\$5,573.75	Revise draft reply brief in further support of anti-SLAPP motion; case law research in support of same	✓
1/23/2025	Wakefield, Tom	2.2	\$2,598.75	Revise anti-SLAPP brief	✓
1/24/2025	Margo, Benjamin D.	0	\$0.00	Edit draft reply brief in further support of anti-SLAPP motion	
1/24/2025	Baskin, Joshua A.	0.9	\$1,074.94	Revise anti-slapp reply	✓
1/24/2025	Lombardo, Sophie	0.9	\$578.81	Draft reply to opposition to demurrer	
1/25/2025	Margo, Benjamin D.	0.9	\$1,023.75	Review J. Baskin and T. Wakefield's edits and comments on draft reply in further support	✓

				of anti-SLAPP motion; communication with J. Baskin and T. Wakefield re same	
1/25/2025	Wakefield, Tom	4.6	\$5,433.75	Revise reply brief and prepare for argument on 2/4	1/2
1/26/2025	Margo, Benjamin D.	3.6	\$4,095.00	Edit reply brief in further support of anti-SLAPP motion; case law research in support of same	✓
1/26/2025	Lombardo, Sophie	3	\$1,929.37	Revise draft reply to reflect edits from T.Wakefield and J.Baskin	1/2
1/27/2025	Margo, Benjamin D.	8.3	\$9,441.25	Edit reply briefs in further support of anti-SLAPP motion and demurrer, and associated papers, in coordination with J. Baskin, T. Wakefield, and S. Lombardo; meet and confer with Plaintiff re required sealing motion; communication with co-defendants and plaintiff re same	1/2
1/27/2025	Wakefield, Tom	0	\$0.00	Review J. Baskin's edits to reply	
1/27/2025	McNamara, Mariana	4.2	\$2,058.00	Verify and conform citations in anti-SLAPP motion and prepare and review legal history reports of cases cited in same	✓
1/27/2025	Baskin, Joshua A.	2.1	\$2,508.19	Revise anti-slap and demurrer replies	1/2
1/27/2025	Lombardo, Sophie	0.9	\$578.81	Revise demurrer draft to reflect B.Margo's feedback	
1/27/2025	Lombardo, Sophie	1.6	\$1,029.00	Draft declarations of J.Baskin and B.Margo in further support of reply to plaintiff's anti-SLAPP and demurrer motions	1/2
1/27/2025	Lombardo, Sophie	0	\$0.00	Coordinate with B.Margo on next steps for reply to plaintiff's opposition to demurrer and anti-SLAPP	
1/27/2025	Lombardo, Sophie	0.4	\$257.25	Send draft reply materials for citation check	1/2
1/27/2025	Lombardo, Sophie	0.4	\$257.25	Attend meet and confer regarding materials under seal	✓
1/27/2025	Lombardo, Sophie	0.3	\$192.94	Coordinate with B.Margo on next steps regarding demurrer draft	
1/27/2025	Lombardo, Sophie	0.4	\$257.25	Draft reply in further support of demurrer	
1/28/2025	Van Horn, Stephanie M.	0	\$0.00	Review factual citations and quotations to non-legal citations in demurrer and prepare legal history reports in preparation for review	
1/28/2025	Wakefield, Tom	0	\$0.00	Oversee finalizing and filing of brief	

1/28/2025	McNamara, Mariana	4.6	\$2,254.00	Verify and conform citations in demurrer and anti-SLAPP motion and prepare tables same	1/2
1/28/2025	Baskin, Joshua A.	0.9	\$1,074.94	Finalize anti-slapp and demurrer filings	1/2
1/28/2025	Margo, Benjamin D.	6.4	\$7,280.00	Edit and finalize replies in further support of anti-SLAPP motion and demurrer, and associated declarations, with S. Lombardo	1/2
1/28/2025	Lombardo, Sophie	0.4	\$257.25	Draft sealing motion for B.Margo's review	✓
1/28/2025	Lombardo, Sophie	1.1	\$707.44	Revise reply to plaintiff's opposition to anti-SLAPP	✓
1/28/2025	Lombardo, Sophie	1.2	\$771.75	Revise reply to plaintiff's opposition to demurrer	
1/28/2025	Lombardo, Sophie	1.7	\$1,093.31	Conduct substantive citation review of reply to anti-SLAPP opposition	✓
1/28/2025	Lombardo, Sophie	0.6	\$385.87	Coordinate with Office of the Clerk on filing needs	✓
1/28/2025	Lombardo, Sophie	0.4	\$257.25	Coordinate with Y.Sheard on drafting exhibits for filing	✓
1/28/2025	Lombardo, Sophie	0.7	\$450.19	Coordinate with J.Baskin, T.Wakefield, and B.Margo on outstanding needs for demurrer draft and draft declarations	
1/28/2025	Lombardo, Sophie	0.4	\$257.25	Review final draft of reply in further support of demurrer and anti-SLAPP with B.Margo in advance of filing	1/2
1/29/2025	Margo, Benjamin D.	0.6	\$682.50	Finalize filing of reply briefs in further support of anti-SLAPP motion and demurrer (after midnight Eastern Time)	1/2
1/30/2025	Wakefield, Tom	1.7	\$2,008.12	Continue preparing for demurrer/anti-SLAPP argument	1/2
1/30/2025	Lombardo, Sophie	3.9	\$2,508.19	Draft synthesizing document identifying most significant cases to support T.Wakefield argument preparation	1/2
1/31/2025	Margo, Benjamin D.	0.3	\$341.25	Assist T. Wakefield with oral argument prep for anti-SLAPP motion and demurrer	1/2
1/31/2025	Wakefield, Tom	0.8	\$945.00	Prepare for and join sync with JDG re strategy for hearing	
1/31/2025	Wakefield, Tom	3.8	\$4,488.75	Prepare for hearing	
1/31/2025	Lombardo, Sophie	1.2	\$771.75	Draft synthesizing document identifying most significant cases to support T.Wakefield argument preparation	1/2
2/1/2025	Wakefield, Tom	4.1	\$4,843.12	Draft argument for and practice arguing demurrer and anti-SLAPP issues, with emphasis on public interest	1/2

2/2/2025	Wakefield, Tom	3.3	\$3,898.12	Draft and practice oral argument for anti-SLAPP motion, focusing on First Amendment and 230	1/2
2/3/2025	Margo, Benjamin D.	0.2	\$227.50	Analyze tentative order on anti-SLAPP motion and demurrer	✓
2/3/2025	Baskin, Joshua A.	0	\$0.00	Prepare for anti-slapp hearing	✓
2/3/2025	Margo, Benjamin D.	1.1	\$1,251.25	Assist T. Wakefield with oral argument on anti-SLAPP motion; analyze court's tentative order re same	✓
2/3/2025	Wakefield, Tom	4.3	\$5,079.37	Read tentative and cases cited therein; moot with J. Baskin; sync re. plan for argument with other defendants; and make final preparations for argument	✓
2/3/2025	Lombardo, Sophie	0.9	\$578.81	Review filings and collect supporting materials for T.Wakefield in advance of hearing	✓
2/3/2025	Lombardo, Sophie	0.4	\$257.25	Review tentative order and coordinate with G.Glynn regarding preparation of binders in advance of hearing	✓
2/3/2025	Lombardo, Sophie	0.4	\$257.25	Attend coordination call with co-defendants in advance of hearing	✓
2/3/2025	Vargas, Christopher	0	\$0.00	Retrieve cases	
2/4/2025	Margo, Benjamin D.	1.6	\$1,820.00	Assist T. Wakefield in advance of oral argument; draft proposed order granting anti-SLAPP motion; coordinate with co-defendants re joint proposed order on anti-SLAPP motion, per court request	✓
2/4/2025	Baskin, Joshua A.	2.7	\$3,224.81	Attend and win anti-slapp motion; attention to media statements and proposed order	✓
2/4/2025	Wakefield, Tom	1.9	\$2,244.37	Argue anti-SLAPP motion	✓
2/4/2025	Lombardo, Sophie	0.8	\$514.50	Conduct legal research on scope of attorney fees and requirements for fee motions upon grant of anti-SLAPP	✓
2/4/2025	Lombardo, Sophie	0	\$0.00	Revise proposed order in coordination with B.Margo	
2/4/2025	Lombardo, Sophie	1.4	\$900.37	Attend hearing regarding anti-SLAPP motion	✓
2/5/2025	Lombardo, Sophie	3.7	\$2,379.56	Conduct legal research regarding scope of recoverable attorney fees and requirements for filing motions upon grant of an anti-SLAPP motion	✓
2/5/2025	Margo, Benjamin D.	0.2	\$227.53	Plan anti-SLAPP fees motion	✓

2/6/2025	Margo, Benjamin D.	0.2	\$227.50	Coordinate motion for attorneys' fees after grant of anti-SLAPP motion, with S. Lombardo	✓
2/10/2025	Lombardo, Sophie	0	\$0.00	Coordinate with P.Rucker regarding entry of judgment requirements	
2/13/2025	Margo, Benjamin D.	0	\$0.00	Communication with J. Baskin and T. Wakefield re anti-SLAPP fees motion	
2/14/2025	Wakefield, Tom	0.2	\$236.25	Begin strategizing for CMC statement	
2/14/2025	Lombardo, Sophie	1.1	\$707.44	Draft Joint Case Management Statement	
2/14/2025	Lombardo, Sophie	0	\$0.00	Research requirements for filing Case Management Statement	
2/18/2025	Lombardo, Sophie	0	\$0.00	Complete and file CM-110 Statement	
2/18/2025	Wakefield, Tom	0.8	\$945.00	Advise on case management statement	
2/19/2025	Lombardo, Sophie	0.6	\$385.87	Conduct legal research regarding requirements related to seeking entry of judgment	✓
2/19/2025	Lombardo, Sophie	0.4	\$257.25	Prepare Notice of Entry of Judgment or Order and circulate draft with team	✓
2/19/2025	Wakefield, Tom	0.4	\$472.50	Advise on order and fees motion	✓
2/20/2025	Lombardo, Sophie	0	\$0.00	Coordinate with J.Baskin on entry of judgment next steps	
2/20/2025	Lombardo, Sophie	2.7	\$1,736.44	Conduct legal research on entry of judgment requirements in San Francisco Superior Court	✓
2/20/2025	Lombardo, Sophie	0	\$0.00	Research deadlines for filing a motion for attorneys fees upon prevailing in anti-SLAPP motion	
2/20/2025	Lombardo, Sophie	0.9	\$578.81	Draft proposed judgment for dismissal	✓
2/24/2025	Wakefield, Tom	0.2	\$236.25	Review notice of entry of judgment and deadlines related to same	✓
2/25/2025	Lombardo, Sophie	0.4	\$257.25	Revise draft proposed judgment in advance of filing	✓
2/25/2025	Lombardo, Sophie	0.4	\$257.25	Circulate revised proposed judgment to co-defendants for final approval	✓
2/27/2025	Lombardo, Sophie	0	\$0.00	Conduct final review of proposed judgment before filing.	
3/4/2025	Lombardo, Sophie	0.4	\$257.25	Attend team coordination call regarding fees motion drafting plan	✓
3/4/2025	Lombardo, Sophie	0.7	\$450.19	Research fees motion deadline and circulate findings as well as sample fees motions with team	✓

3/4/2025	Wakefield, Tom	0.4	\$472.50	Advise re fees motion
3/4/2025	Baskin, Joshua A.	0.4	\$477.75	Strategize regrading fees motion
3/4/2025	Margo, Benjamin D.	1.1	\$1,251.25	Plan motion for attorneys' fees, with T. Wakefield; call with counsel for co-defendant Amazon Web Services re same; legal research on procedure re same
3/5/2025	Wakefield, Tom	0.4	\$472.50	Confer re strategy for fees
3/6/2025	Lombardo, Sophie	4.2	\$2,701.12	Draft fees motion
3/7/2025	Lombardo, Sophie	2.3	\$1,479.19	Draft motion for attorneys fees
3/10/2025	Lombardo, Sophie	0.3	\$192.94	Circulate draft fees motion with team and coordinate on next steps
3/10/2025	Margo, Benjamin D.	0.4	\$455.00	Develop legal arguments for motion for attorneys' fees after successful anti-SLAPP motion to strike; communication with S. Lombardo re same
3/13/2025	Lombardo, Sophie	0	\$0.00	Synthesize information regarding fee rates
3/13/2025	Lombardo, Sophie	0.2	\$128.62	Coordinate on obtaining 2024 billing rate data for inclusion in draft fees motion
3/18/2025	Lombardo, Sophie	0.3	\$192.94	Coordinate with B.Margo on next steps in drafting fees motion
3/19/2025	Margo, Benjamin D.	0.2	\$227.50	Communication with co-defendants to plan joint motion for attorneys' fees after successful anti-SLAPP motion to strike
3/20/2025	Lombardo, Sophie	0.4	\$257.25	Coordinate with B.Margo on draft fees motion next steps
3/20/2025	Margo, Benjamin D.	0.6	\$682.50	Revise draft motion for attorneys' fees after successful anti-SLAPP motion to strike; call with S. Lombardo re same
3/21/2025	Margo, Benjamin D.	0.6	\$682.50	Edit draft motion for attorneys' fees after successful anti-SLAPP motion
3/24/2025	Lombardo, Sophie	5.7	\$3,665.81	Revise fees motion
3/25/2025	Lombardo, Sophie	0.4	\$257.25	Revise draft fees motion, per B.Margo's guidance
3/25/2025	Lombardo, Sophie	1.7	\$1,093.31	Draft Baskin Declaration in support of fees motion
3/25/2025	Lombardo, Sophie	0.2	\$128.62	Correspond with B.Margo regarding fees motion edits and next steps
3/25/2025	Lombardo, Sophie	0.2	\$128.62	Prepare exhibits for submission with fees motion

3/25/2025	Margo, Benjamin D.	1.9	\$2,161.25	Draft section of motion for attorneys' fees after successful anti-SLAPP Motion to strike
3/26/2025	Lombardo, Sophie	0.9	\$578.81	Revise fees motion based on B.Margo's feedback
3/26/2025	Lombardo, Sophie	1.4	\$900.37	Review billing spreadsheets to support team's strategy in fees motion and circulate with B.Margo
3/26/2025	Margo, Benjamin D.	1.6	\$1,820.00	Edit draft fees motion and supporting declaration; communication with co-defendants re same; legal research re same
3/27/2025	Lombardo, Sophie	0.3	\$192.94	Research case law on fees motions involving TROs
3/27/2025	Lombardo, Sophie	0.4	\$257.25	Research "inextricably intertwined" standard for fees motion
3/27/2025	Lombardo, Sophie	0.4	\$257.25	Coordinate with B.Margo on proposed revisions
3/27/2025	Lombardo, Sophie	3.1	\$1,993.69	Revise draft fees motion to reflect B.Margo's edits
3/27/2025	Margo, Benjamin D.	3.9	\$4,436.25	Draft motion for attorneys' fees after successful anti-SLAPP motion to strike complaint; case law research re same; call with S. Lombardo re same
3/28/2025	Lombardo, Sophie	0.9	\$578.81	Legal research on reasonableness
3/28/2025	Lombardo, Sophie	0.2	\$128.62	Coordinate with R.Evelyn on fees calculations
3/28/2025	Lombardo, Sophie	0	\$0.00	Research Local Rules regarding filing requirements
3/28/2025	Lombardo, Sophie	3.6	\$2,315.25	Revise draft fees motion
4/1/2025	Lombardo, Sophie	0.9	\$578.81	Revise J.Baskin Declaration
4/1/2025	Lombardo, Sophie	0.4	\$257.25	Prepare exhibits for fees motion
4/1/2025	Lombardo, Sophie	0.3	\$192.94	Revise fees motion exhibit citations
4/1/2025	Margo, Benjamin D.	1.2	\$1,365.00	Edit draft motion for attorneys' fees; calculate actual rates billed to Substack against benchmark rates from PwC
4/2/2025	Lombardo, Sophie	1.7	\$1,093.31	Revise fee motion
4/2/2025	Lombardo, Sophie	0.6	\$385.87	Coordinate with B.Margo on revisions to fee motion
4/2/2025	Lombardo, Sophie	0.3	\$192.94	Correspond with B.Margo regarding outstanding fees motion needs
4/2/2025	Margo, Benjamin D.	1.4	\$1,592.50	Edit declaration in support of motion for attorneys' fees after successful anti-SLAPP

				motion to strike; review time entries for reasonableness
4/3/2025	Lombardo, Sophie	2.4	\$1,543.50	Revise fees motion and circulate draft with team
4/3/2025	Margo, Benjamin D.	0.9	\$1,023.75	Edit motion for attorneys' fees; coordinate associated data collection with S. Lombardo; communication with counsel for co-defendants re draft motion
4/4/2025	Lombardo, Sophie	0.3	\$192.94	Coordinate with finance regarding billing data
4/4/2025	Lombardo, Sophie	0.2	\$128.62	Circulate draft fees motion with co-counsel for review
4/7/2025	Lombardo, Sophie	0.8	\$514.50	Revise fees motion
4/7/2025	Lombardo, Sophie	0.6	\$385.87	Attend to outstanding needs in advance of filing fees motion
4/7/2025	Lombardo, Sophie	0.2	\$128.62	Correspond with B.Margo regarding exhibits
4/7/2025	Margo, Benjamin D.	0.6	\$682.50	Research in support of motion for attorneys' fees after successful anti-SLAPP motion to strike, including preparation to edit resumes and other supporting documents; coordinate with co-defendants re same
4/8/2025	Margo, Benjamin D.	0.7	\$796.25	Coordinate with S. Lombardo re the fees exhibit and brief in support of fees motion; coordinate with co-defendants seeking a declaration to show reasonableness of fees
4/8/2025	Lombardo, Sophie	0.8	\$514.50	Attend to outstanding needs in advance of filing fees motion
4/8/2025	Lombardo, Sophie	0.2	\$128.62	Revise fees motion
4/8/2025	Lombardo, Sophie	0.6	\$385.87	Coordinate with B.Margo on outstanding fees motion needs
4/9/2025	Wakefield, Tom	1.1	\$1,299.37	Revise fees brief
4/10/2025	Lombardo, Sophie	0.7	\$450.19	Revise fees motion
4/10/2025	Lombardo, Sophie	0.2	\$128.62	Correspond regarding T.Wakefield's edits
4/10/2025	Wakefield, Tom	1.9	\$2,244.37	Finish revising fees brief and instruct team on exhibits, etc.
4/10/2025	Margo, Benjamin D.	0.4	\$455.00	Fact research in support of motion for attorneys' fees after successful anti-SLAPP motion, including identifying Plaintiffs' previous threat to impose costs through litigation

4/11/2025	Lombardo, Sophie	0.2	\$128.62	Correspond re preparation of fees motion exhibits
4/11/2025	Lombardo, Sophie	1.3	\$836.06	Correspond re notice of appeal and filing deadlines
4/11/2025	Wakefield, Tom	1.1	\$1,299.37	Review NOA papers filed by Blackman and deadlines related to same
4/11/2025	Margo, Benjamin D.	0.3	\$341.25	Coordinate filing logistics and procedure for motion for attorneys' fees, with T. Wakefield and S. Lombardo
4/14/2025	Lombardo, Sophie	0.2	\$128.62	Correspond re appeal deadlines
4/14/2025	Lombardo, Sophie	0.9	\$578.81	Prepare exhibits for fees motion
4/14/2025	Margo, Benjamin D.	0.3	\$341.25	Coordinate with co-defendants re edits to brief in support of fees motion; coordinate preparation of time-worked descriptions for fees motion
4/14/2025	Wakefield, Tom	0.6	\$708.75	Begin strategizing re. appeal
4/15/2025	Margo, Benjamin D.	2.2	\$2,502.50	Edit draft brief in support of fees motion, as well as supporting declaration, exhibit showing hourly rates of attorneys against PWC benchmark rates, and attorney biographies; call with S. Lombardo re applicable benchmark metrics to show reasonableness of rates
4/15/2025	Lombardo, Sophie	0.4	\$257.25	Revise attorney biographies for fees motion and circulate with team
4/15/2025	Lombardo, Sophie	0.9	\$578.81	Research local rules regarding hearing dates
4/15/2025	Lombardo, Sophie	0.9	\$578.81	Touchbase with B.Margo on outstanding fees motion needs
4/15/2025	Lombardo, Sophie	0.9	\$578.81	Revise Baskin Declaration
4/15/2025	Lombardo, Sophie	1.4	\$900.37	Revise fees motion
4/15/2025	Lombardo, Sophie	0.6	\$385.87	Coordinate outstanding needs in advance of filing date
4/15/2025	Lombardo, Sophie	1.4	\$900.37	Prepare exhibits for fees motion
4/16/2025	Lombardo, Sophie	0.9	\$578.81	Circulate draft motion with co-defendants for review and coordinate on outstanding needs
4/16/2025	Lombardo, Sophie	0.6	\$385.87	Revise fees motion
4/16/2025	Lombardo, Sophie	0.4	\$257.25	Correspond re billing entries

4/16/2025	Margo, Benjamin D.	0.4	\$455.00	Edit draft brief in support of fees motion; email communications with co-defendants re supporting documents for fees motion
4/16/2025	Wakefield, Tom	2.2	\$2,598.75	Make final revisions to fees' motion, revise bio for declaration, and circulate same to client
4/17/2025	Lombardo, Sophie	0.8	\$514.50	Correspond re final needs on fees motion filing
4/17/2025	Lombardo, Sophie	0.4	\$257.25	Review record designation and appeal deadlines
4/17/2025	Lombardo, Sophie	0	\$0.00	Review biography revisions for submission with fee motion
4/17/2025	Lombardo, Sophie	0	\$0.00	Coordinate on exhibit preparation
4/17/2025	Lombardo, Sophie	0.6	\$385.87	Research declaration filing requirements in S.F. Superior
4/17/2025	Lombardo, Sophie	0.2	\$128.62	Revise Baskin Declaration
4/17/2025	Margo, Benjamin D.	0.8	\$910.12	Edit draft motion for attorneys' fees and supporting documents; call with T. Wakefield re same
	Total Hours & Fees	592.50	\$500,311.41	

Costs Billed through April 17, 2025

Date	Cost Desc	Billed Amt
10/10/2024	Lexis Database Service	\$116.28
11/6/2024	Messenger expense	\$75.00
11/7/2024	Lexis Database Service	\$6.53
11/12/2024	Document Filing Fees	\$22.75
11/12/2024	Westlaw Database Service	\$128.69
11/12/2024	Lexis Database Service	\$199.24
11/13/2024	Westlaw Database Service	\$662.40
11/13/2024	Lexis Database Service	\$790.43
11/13/2024	Lexis Database Service	\$144.00