

**Fill in this information to identify the case:**

Debtor 1 Highland Capital Management, L.P.

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: Northern District of Texas

Case number 19-34054-sgj11

**Official Form 410**  
**Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor? Abrams & Bayliss LLP  
Name of the current creditor (the person or entity to be paid for this claim)  
Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent? **Where should notices to the creditor be sent?** **Where should payments to the creditor be sent? (if different)**

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<u>John M. Seaman</u> Name <u>20 Montchanin Road - Suite 200</u> Number Street <u>Wilmington DE 19807</u> City State ZIP Code Contact phone <u>302-7788-1152</u> Contact email <u>seaman@abramsbayliss.com</u>	_____ Name _____ Number Street _____ City State ZIP Code Contact phone _____ Contact email _____
-----------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------

Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
\_\_\_\_\_

4. Does this claim amend one already filed?  No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_  
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  No  
 Yes. Who made the earlier filing? \_\_\_\_\_

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Official Form 410  Date Stamped Copy Returned  
 No self addressed stamped envelope **Proof of Claim**  
 No copy to return



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 0 7 2 9

7. How much is the claim? \$ 107,747.56. Does this amount include interest or other charges?  No  Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  
Legal services rendered in connection with the Daugherty Litigation

9. Is all or part of the claim secured?  No  Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)

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**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  Yes. Identify the property: \_\_\_\_\_

**12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

No

Yes. Check one:

Amount entitled to priority

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ \_\_\_\_\_

Up to \$3,025\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

Wages, salaries, or commissions (up to \$13,650\* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 1 27 2020  
MM / DD / YYYY

John M. Seaman  
Signature

Print the name of the person who is completing and signing this claim:

Name John M. Seaman  
First name Middle name Last name

Title Attorney

Company Abrams & Bayliss LLP  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 20 Montchanin Road - Suite 200  
Number Street

Wilmington DE 19807  
City State ZIP Code

Contact phone 302-778-1152 Email seaman@abramsbayliss.com

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JAN 29 2020

KURTZMAN CARSON CONSULTANTS

ABRAMS & BAYLISS LLP

20 MONTCHANIN ROAD  
SUITE 200  
WILMINGTON, DE 19807  
302-778-1000



HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: January 22, 2020  
Invoice No. 914256  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

Previous Balance Forward \$108,399.83

<u>Stmt Date</u>	<u>Stmt #</u>	<u>Billed</u>	<u>Due</u>
06/06/2019	91415	5,588.78	5,588.78
07/14/2019	91918	40,291.09	40,291.09
08/16/2019	92453	3,689.75	3,689.75
09/13/2019	92762	4,887.16	4,887.16
10/23/2019	93201	18,500.30	18,500.30
11/18/2019	93453	35,442.75	35,442.75
			<u>108,399.83</u>

Payments

Payment applied from escrow -652.27

**TOTAL AMOUNT DUE:** \$107,747.56



# ABRAMS & BAYLISS LLP

20 MONTCHANIN ROAD  
SUITE 200  
WILMINGTON, DE 19807  
302-778-1000



HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: June 6, 2019  
Invoice No. 91415  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

## Activities

			Hours	
04/08/2019	JMS	Attention to correspondence re joint privilege and common interest arguments	0.30	217.50
	MLM	Email DLA in response to motion to compel questions	0.30	148.50
04/11/2019	MLM	Response to DLA questions for upcoming motion to compel hearing	0.10	49.50
04/12/2019	JMS	Attention to correspondence re motion to compel hearing	0.20	145.00
04/16/2019	JMS	Call with DLA re motion to compel hearing update	0.50	362.50
04/17/2019	JMS	Attention to correspondence from DLA re documents for in camera review	0.40	290.00
	MLM	Attention to DLA questions re work product and Court's <i>in camera</i> review of Abrams & Bayliss documents	0.50	247.50
04/18/2019	JMS	Attention to correspondence re in camera submission	0.20	145.00
	MLM	Gather Delaware authorities addressing work product; email DLA re same	0.70	346.50
04/22/2019	JMS	Attention to correspondence re privilege log questions from DLA; draft email response to same	0.20	145.00
	MLM	Review documents to potentially roll off privilege log; email DLA in response to questions about documents to potentially roll off log	0.20	99.00
04/23/2019	JMS	Analyze anticipated attacks on privilege assertions	0.20	145.00
04/24/2019	JMS	Analyze escrow agreement; analyze substantive escrow memo and privilege log	0.30	217.50
	MLM	Attention to indemnification issues	0.10	49.50
04/30/2019	JMS	Attention to docket and stipulated order re briefing on pending motions	0.10	72.50

HIGHLAND EMPLOYEE RETENTION ASSETS

Invoice Date: June 6, 2019  
 Invoice No. 91415  
 Account No. 729.00  
 Page: 2

Re: Daugherty -- Escrow Agent

			Hours	
05/09/2019	JMS	Attention to hearing transcript on motion to compel	0.30	217.50
05/21/2019	JMS	Attention to correspondence re document production and depositions; draft response to plaintiffs re same	1.00	725.00
	MLM	Attention to potential document production; review privilege log; analyze Court's letter ruling	1.00	495.00
05/22/2019	JMS	Attention to correspondence to court from Daugherty's counsel re document production and deposition scheduling; call with DLA re same; correspondence to Daugherty's counsel re deposition scheduling	0.60	435.00
	MLM	Call with DLA re document production and privilege issues	0.30	148.50
05/23/2019	JMS	Analyze order, letter to court from DLA Piper and order to show cause re production of privileged documents	0.20	145.00
05/24/2019	JMS	Attention to correspondence from court re hearing on motion to compel; call with Uebler re scheduling	0.30	217.50
05/27/2019	JMS	Review hearing transcript and ruling on motion to compel re privileged communications	0.40	290.00
05/30/2019	JMS	Review opposition to motion to compel	0.30	217.50
		For Current Services Rendered	8.70	5,571.50

Advances

04/30/2019	Document Fees File & ServeXpress Holdings (Invoice 201904063554601)	13.50
04/30/2019	Online Legal Research West (Invoice 840182202)	3.78
	Total Advances	17.28
	Total Current Work	5,588.78
	Previous Balance Forward	\$38,235.58
	<b>TOTAL AMOUNT DUE:</b>	<b><u>\$43,824.36</u></b>

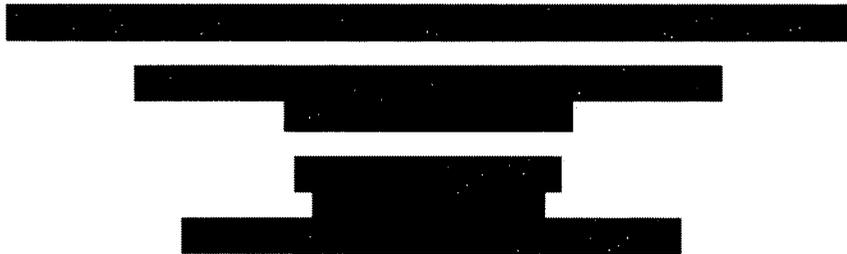


HIGHLAND EMPLOYEE RETENTION ASSETS

Re: Daugherty -- Escrow Agent

Invoice Date:  
Invoice No.  
Account No.

June 6, 2019  
91415  
729.00  
Page: 3



# ABRAMS & BAYLISS LLP

20 MONTCHANIN ROAD  
SUITE 200  
WILMINGTON, DE 19807  
302-778-1000



HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: July 14, 2019  
Invoice No. 91918  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

## Activities

			Hours	
06/03/2019	JMS	Deposition scheduling correspondence; attention to motion for stay pending appeal	0.40	290.00
06/11/2019	JMS	Correspondence with Uebler re deposition scheduling	0.10	72.50
06/12/2019	JMS	Deposition prep for Miller	0.50	362.50
	MLM	Attention to deposition issues	0.10	49.50
06/14/2019	JMS	Deposition prep	0.20	145.00
	MLM	Email paralegals re deposition preparation binder	0.30	148.50
06/17/2019	KMV	Review A&B production in response to subpoena; assemble documents for deposition preparation binder	3.80	931.00
	MLM	Prepare for Miller deposition	0.10	49.50
	TNM	Attention to emails re deposition preparation binders	0.20	45.00
06/18/2019	JMS	Deposition preparation with Miller; calls with Uebler re scheduling deposition; analyze crime fraud arguments; review transcript rulings	2.50	1,812.50
	KMV	Review A&B production in response to subpoena; assemble documents for deposition preparation binder	1.50	367.50
	MLM	Prepare for Miller deposition; review recent transcript rulings; discuss rulings with Seaman	1.10	544.50
06/19/2019	TNM	Prepare deposition preparation binder; attention to emails re same	2.00	450.00
	JMS	Deposition preparation with Miller; review prep binders	1.60	1,160.00
	KMV	Assemble documents for deposition binder	1.40	343.00
	MLM	Prepare for Miller deposition	0.40	198.00
	ALD	Preparation of deposition binders	1.00	225.00
	KGA	Review transcripts of Court's rulings on Daugherty discovery motions	0.40	358.00
06/20/2019	JMS	Miller deposition prep; further document review and deposition prep	5.90	4,277.50
	KMV	Review and analyze A&B production in response to subpoena	3.90	955.50

HIGHLAND EMPLOYEE RETENTION ASSETS

Invoice Date: July 14, 2019  
 Invoice No. 91918  
 Account No. 729.00  
 Page: 2

Re: Daugherty -- Escrow Agent

		Hours	
	MLM Prepare for Miller deposition	0.70	346.50
	ALD Preparation of deposition prep binders	2.10	472.50
	KGA Review key documents re Daugherty claims against Highland; call with Seaman re A&B 30(b)(6) deposition and parties' positions	0.70	626.50
06/21/2019	JMS Deposition preparation; call with DLA	2.30	1,667.50
06/23/2019	JMS Deposition prep	1.40	1,015.00
	KGA Messages re Daugherty discovery on termination of Highland escrow agreement	0.10	89.50
06/24/2019	KGA Review Highland answer and consider fact/legal issues re escrow termination	0.20	179.00
06/25/2019	JMS Deposition preparation with Miller	0.50	362.50
	MLM Review binder of materials to prepare for deposition; discuss key documents with Seaman	3.30	1,633.50
06/26/2019	JMS Review deposition transcript; deposition prep; analyze escrow agreement and memoranda	3.10	2,247.50
	KGA Review multiple documents (escrow agreement, legal memos, emails, deposition and trial testimony, and Delaware court transcripts and rulings); evaluate Daugherty claims against Highland re transfer of funds and LLC interests; related messages with Seaman	1.20	1,074.00
06/27/2019	JMS Deposition prep with Miller	3.00	2,175.00
	MLM Prepare for deposition with Seaman	3.20	1,584.00
06/28/2019	JMS Prepare for and defend Miller deposition	8.20	5,945.00
	JMS Report to Abrams on deposition	0.40	290.00
	MLM Give deposition; consult with Seaman re deposition	7.90	3,910.50
	KGA Address discovery developments re Abrams & Bayliss holding account	0.10	89.50
	For Current Services Rendered	<u>65.80</u>	<u>36,493.00</u>

Expenses

Photocopying	759.15
Overnight Delivery	117.85
Total Expenses	<u>877.00</u>

Advances

06/30/2019	Online Legal Research West (Invoice 840508376)	37.68
06/30/2019	Document Retrieval Courtlink LexisNexis Inc. (Invoice EA-818860)	3.36
07/03/2019	Transcription Fees Lexitas/Wilcox & Next Generation, LLC (Invoice 101390)	2,880.05
	Total Advances	<u>2,921.09</u>

HIGHLAND EMPLOYEE RETENTION ASSETS

Re: Daugherty – Escrow Agent

Invoice Date: July 14, 2019  
Invoice No. 91918  
Account No. 729.00  
Page: 3

Total Current Work	40,291.09
Previous Balance Forward	\$43,824.36
<b>TOTAL AMOUNT DUE:</b>	<b><u>\$84,115.45</u></b>

[REDACTED]

[REDACTED]

# ABRAMS & BAYLISS LLP

20 MONTCHANIN ROAD  
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WILMINGTON, DE 19807  
302-778-1000



HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: August 16, 2019  
Invoice No. 92453  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

## Activities

			Hours	
07/03/2019	JMS	Call to DLA re reliance on advice of counsel; attention to errata for deposition transcript	0.60	486.00
	KMV	Review Miller deposition transcript and prepare errata sheet	2.50	612.50
07/08/2019	JMS	Analyze ruling on motion for interlocutory appeal; analyze issues raised in Miller deposition	1.10	891.00
	MLM	Review interlocutory appeal order	0.10	58.50
	KGA	Address Firm positions on escrow agent resignation issues	0.20	193.00
07/09/2019	JMS	Attention to appeal from denial of interlocutory order	0.20	162.00
07/14/2019	JMS	Correspondence from Uebler re production of native version of Girard attachment	0.40	324.00
07/18/2019	KMV	Review Highland v. Daugherty opinion from Delaware Supreme Court	0.10	24.50
07/19/2019	MLM	Address Highland indemnification obligations under Escrow Agreement	0.10	58.50
07/23/2019	MLM	Review and revise errata sheet for Miller deposition transcript	1.50	877.50
		For Current Services Rendered	6.80	3,687.50

## Expenses

Photocopying	2.25
Total Expenses	2.25
Total Current Work	3,689.75
Previous Balance Forward	\$45,879.87

HIGHLAND EMPLOYEE RETENTION ASSETS

Re: Daugherty -- Escrow Agent

Invoice Date: August 16, 2019  
Invoice No. 92453  
Account No. 729.00  
Page: 2

**TOTAL AMOUNT DUE:**

\$49,569.62

[REDACTED]

[REDACTED]

# ABRAMS & BAYLISS LLP

20 MONTCHANIN ROAD  
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302-778-1000



HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: September 13, 2019  
Invoice No. 92762  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

## Activities

			Hours	
08/07/2019	JMS	Correspondence and call with Uebler re trial testimony; attention to errata	0.30	243.00
	MLM	Discuss trial testimony with Seaman	0.10	58.50
08/12/2019	JMS	Attention to trial schedule for Miller; analyze third party trial witness issues	0.50	405.00
	JAS	Analyze third party trial witness examination issues	1.60	560.00
	MLM	Attention to trial scheduling and testimony	0.10	58.50
08/13/2019	JMS	Analyze third party trial witness examination issues	0.90	729.00
	JAS	Analyze trial witness examination procedures	0.30	105.00
08/14/2019	JMS	Analyze strategy for presenting Miller trial testimony	0.40	324.00
	JAS	Review precedents re third party trial witness examination	1.60	560.00
08/15/2019	JMS	Call with DLA re Miller testimony	0.20	162.00
08/16/2019	JAS	Draft motion re third party witness examination procedure	3.10	1,085.00
08/21/2019	JMS	Attention to order scheduling summary judgment argument; call with Uebler re trial schedule	0.20	162.00
08/29/2019	JMS	Analyze pretrial order	0.40	324.00
		For Current Services Rendered	9.70	4,776.00

## Expenses

Photocopying	48.45
Total Expenses	48.45



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20 MONTCHANIN ROAD  
SUITE 200  
WILMINGTON, DE 19807  
302-778-1000

HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: October 23, 2019  
Invoice No. 93201  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

## Activities

			Hours	
09/02/2019	JMS	Analyze pretrial order and pretrial brief	2.00	1,620.00
	KGA	Review inaccuracies in Highland pre-trial brief, related deposition testimony, and related messages	0.40	386.00
09/03/2019	JMS	Prepare for trial; analyze deposition transcript; analyze Daugherty's pretrial brief; calls with DLA and Uebler	2.40	1,944.00
	JMS	Attend pretrial conference	2.00	1,620.00
	MLM	Review parties' pre-trial briefs; address Dondero testimony; consider trial testimony	2.40	1,404.00
09/04/2019	JMS	Analyze plaintiff's pretrial brief	1.00	810.00
	JMS	Correspondence re trial dates	0.20	162.00
	MLM	Analyze questions re Highland pre-trial brief	0.10	58.50
09/05/2019	JMS	Attention to order rescheduling trial	0.20	162.00
	MLM	Address V.C. Zurn letter	0.20	117.00
09/06/2019	KGA	Consider Highland representation issues and Miller testimony at upcoming trial; related call with Surgent	0.60	579.00
09/07/2019	JMS	Analyze trial arguments	1.20	972.00
	KGA	Prepare for call with Surgent re Daugherty litigation issues; review Daugherty litigation documents; call with Surgent re Daugherty litigation; follow-up call with working group	1.50	1,447.50
09/17/2019	JMS	Correspondence with DLA re trial preparation and advice of counsel defense	0.10	81.00
	JMS	Draft and revise motion for leave to examine witness	0.30	243.00
09/18/2019	JMS	Prepare for and attend call with DLA re reliance on advice of counsel defense and trial testimony; draft and revise motion for leave to examine witness	1.00	810.00



# ABRAMS & BAYLISS LLP

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HIGHLAND EMPLOYEE RETENTION ASSETS  
c/o Highland Capital Mgmt, L.P.  
300 Crescent Court - Suite 700  
Dallas, TX 75201

Invoice Date: November 18, 2019  
Invoice No. 93453  
Account No. 729.00  
Page: 1

Attn: Thomas Surgent

Re: Daugherty -- Escrow Agent

## Activities

			Hours	
10/02/2019	JMS	Conference with DLA re Miller trial preparation	0.60	486.00
	MLM	Discuss trial preparation with Seaman	0.10	58.50
	TNM	Attention to emails re trial exhibits	0.20	49.00
10/03/2019	TNM	Document retrieval re joint exhibits for deposition preparation	2.00	490.00
	MLM	Attention to gathering JX-list documents produced by Abrams & Bayliss	0.20	117.00
10/04/2019	TNM	Organize documents for deposition preparation	4.00	980.00
	JMS	Analyze draft witness outline	1.20	972.00
10/07/2019	TNM	Attention to joint exhibits; prepare binders re same	2.00	490.00
	JMS	Attention to Daugherty joint trial exhibits	0.20	162.00
	JMS	Prepare for trial; review deposition testimony and exhibits	1.50	1,215.00
	ALD	Preparation of Abrams & Bayliss trial exhibit binders	3.80	931.00
10/08/2019	JMS	Prepare Miller for trial testimony	4.30	3,483.00
	MLM	Prepare for trial testimony; engage in mock CX with Seaman; review deposition transcript	4.60	2,691.00
10/09/2019	JMS	Draft mock cross-examination of Miller; rehearse same	4.60	3,726.00
	MLM	Prepare for trial testimony; mock cross-examination with Seaman	1.40	819.00
10/14/2019	JMS	Attend trial	8.00	6,480.00
	MLM	Review deposition transcript; call with Seaman re principles for testifying; review Abrams & Bayliss produced documents	1.60	936.00
10/15/2019	JMS	Attend trial	8.00	6,480.00
	MLM	Prepare for trial testimony; testify	3.10	1,813.50
	KGA	Messages with Seaman re parties' trial positions; call with Seaman re Dondero, Daugherty and Ellington testimony	0.30	289.50
10/16/2019	JMS	Attend trial	1.20	972.00

