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9 Attorneys for Defendant
CITY OF COMPTON

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES – SOUTH CENTRAL DISTRICT**

13 KAREEMAH MATEEN-
BRADFORD,

14
15 Plaintiff,

16 v.

17 CITY OF COMPTON, etc., et al.

18
19 Defendant.

Case No. TC026769

[Exempt from filing fees pursuant to Govt.
Code § 6103

Assigned for All Purposes To:
Hon. Gary Y. Tanaka
Dept: A

**COMPTON'S NOTICE OF FILING
SUMMARY OF ATTORNEYS'
FEES INCURRED IN CASE IN
RESPONSE TO MOTIONS FOR
ATTORNEYS' FEES BY THREE
LAW FIRMS**

Hearing: January 28, 2020
Time: 8:30 am
Dept: A

1 Defendant City of Compton (“Compton”) hereby submits its summary of
2 attorneys’ fees incurred by Compton due to outside legal counsel’s work in the
3 *Bradford v. City of Compton* case for the period 2013 through June 2019.
4 Compton notes that due to the volume of the individual bills (over 900 pages in
5 total) it is providing this summary for the Court’s convenience. If the Court
6 requires the actual billing invoices, then Compton will submit those invoices
7 for *in camera* review as they contain multiple privileged references to
8 attorney-client communications and confidential summaries of attorney work
9 product strategies for an on-going matter as this case is currently on appeal.

10 Compton files this summary in response to the Court’s minute order
11 dated December 19, 2019 continuing the hearing date on the three separate
12 motions for attorneys’ fees covering four different law firms to January 28,
13 2020 and requiring that Compton submit its attorneys’ fees information.

14 Exhibit A hereto summarizes the billing hours, highest hourly rates, and
15 total fees expended in this case broken into four distinct periods:

16 (1) October 2013-January 2015: Period in which Wesierski & Zurek law
17 firm represented plaintiff Kareemah Mateen Bradford;

18 (2) October 2015-June 2016: Period in which the Kraft-Miles law firm
19 represented plaintiff Kareemah Mateen Bradford;

20 (3) July 2016-April 2018: Period in which the Ehrlich law firm
21 represented plaintiff Kareemah Mateen Bradford on appeal; and

22 (4) May 2018-June 2019: Period in which the Gladius law firm (with
23 associated counsel at trial, Ms. Boutee) represented Bradford.

24 Exhibit B hereto summarizes the total fee requests based upon the four
25 law firm requests (filed in three separate motions) compared to the fees
26 incurred by Compton for outside counsel work during the same time periods.
27
28

1 Compton further notes that as explained in the previously filed
2 Declaration of Jose R. Paz (filed on December 20, 2019), Compton City
3 Attorneys' office does not maintain billing records for individual matters
4 handled by that office. Therefore, Compton is unable to provide a summary of
5 "billing" for the initial period of this lawsuit from August 2012 through
6 September 2013 since no such records exist.

7 Compton reserves the right to seek a further extension of the current
8 hearing date of January 28, 2020 in order to accommodate further briefing on
9 the summaries of attorneys' fees filed with respect to the three pending
10 motions.

11
12 Dated: January 10, 2020

DAMON M. BROWN

RING BENDER LLP
NORMAN A. DUPONT
PATRICK K. BOBKO
JAY A. TUFANO

13
14
15
16 By: 

NORMAN A. DUPONT
Attorneys for Defendant
CITY OF COMPTON

EXHIBIT A

EXHIBIT A: SUMMARY OF ATTORNEYS' FEES FILED BY CITY OF COMPTON

Richards Watson Gershon (RWG) October 2013 – January 2015					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2013					
RWG	11/30/2013	10/2013	174.60	\$290.00	\$50,634.00
RWG	12/31/2013	11/2013	133.90	\$290.00	\$38,682.50
RWG	01/28/2014	12/2013	280.10	\$290.00	\$73,375.00
2014					
RWG	02/28/2014	01/2014	175.90	\$290.00	\$40,946.00
RWG	03/27/2014	02/2014	81.10	\$290.00	\$20,771.00
RWG	04/29/2014	03/2014	142.90	\$290.00	\$38,355.50
RWG	05/30/2014	04/2014	219.20	\$290.00	\$55,157.50
RWG	06/19/2014	05/2014	395.80	\$290.00	\$108,264.50
RWG	08/13/2014	06/2014	426.10	\$290.00	\$113,883.50
RWG	08/31/2014	07/2014	477.40	\$290.00	\$129,404.00
RWG	09/30/2014	08/2014	586.10	\$290.00	\$161,933.50
RWG	10/31/2014	09/2014	404.90	\$290.00	\$112,454.50
RWG	11/25/2014	10/2014	558.50	\$290.00	\$154,969.00
RWG	12/31/2014	11/2014	236.60	\$290.00	\$68,029.00
RWG	01/31/2015	12/2014	467.80	\$290.00	\$126,818.00
RWG			-103.40	\$290.00	-\$29,986.00*
2015					
RWG	02/28/2015	01/2015	259.50	\$290.00	\$71,928.50
Totals			4,917.00		\$1,335,620.00

* Legal fees for the 2014 Administrative hearing have been detracted.

RWG February 2015 – September 2015					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
RWG	03/31/2015	02/2015	47.80	\$290.00	\$14,101.00
RWG	04/23/2015	03/2015	19.20	\$290.00	\$5,664.00
RWG	05/14/2015	04/2015	2.90	\$290.00	\$855.50
RWG	06/17/2015	05/2015	2.60	\$290.00	\$767.00
RWG	07/14/2015	06/2015	15.30	\$290.00	\$4,462.50
RWG	08/14/2015	07/2015	18.80	\$290.00	\$5,546.00
RWG	09/15/2015	08/2015	45.90	\$290.00	\$12,741.50
RWG	10/14/2015	09/2015	138.90	\$290.00	\$33,852.50
Totals			291.40		\$77,990.00

EXHIBIT A: SUMMARY OF ATTORNEYS' FEES FILED BY CITY OF COMPTON

RWG October 2015 – June 2016					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2015					
RWG	11/30/2015	10/2015	188.50	\$290.00	\$51,476.50
RWG	12/21/2015	11//2015	67.20	\$290.00	\$18,940.00
RWG	01/19/2016	12/2015	20.50	\$290.00	\$6,047.50
2016					
RWG	02/16/2016	01/2016	45.40	\$290.00	\$12,985.00
RWG	03/15/2016	02/2016	109.30	\$290.00	\$29,795.50
RWG	04/28/2016	03/2016	227.90	\$290.00	\$56,129.50
RWG	05/20/2016	04/2016	570.30	\$290.00	\$154,740.50
RWG	06/28/2016	05/2016	100.20	\$290.00	\$26,482.00
RWG	07/25/2016	06/2016	16.70	\$290.00	\$4,433.50
Totals			1,346.00		\$361,030.00

RWG July 2016 – April 2017					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2016					
RWG	08/22/2016	07/2016	4.80	\$290.00	\$1,416.00
RWG	09/08/2016	08/2016	1.30	\$290.00	\$383.50
RWG	10/18/2016	09/2016	0.10	\$290.00	\$29.50
RWG	11/11/2016	10/2016	0.30	\$290.00	\$88.50
RWG	12/06/2016	11/2016	0.70	\$290.00	\$206.50
RWG	01/16/2017	12/2016	0.90	\$290.00	\$265.50
2017					
RWG	02/15/2017	01/2017	0.30	\$290.00	\$88.50
RWG	03/14/2017	02/2017	0.20	\$290.00	\$59.00
RWG	04/18/2017	03/2017	6.40	\$290.00	\$1,888.00
Totals			15.00		\$4,425.00

EXHIBIT A: SUMMARY OF ATTORNEYS' FEES FILED BY CITY OF COMPTON

Ring Bender (RB) July 2016 – April 2017					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2016					
RB	07/12/2016	06/2016	13.30	\$295.00	\$3,923.50
RB	08/04/2016	07/2016	3.10	\$295.00	\$914.50
RB	09/07/2016	08/2016	3.20	\$295.00	\$944.00
RB	10/17/2016	09/2016	6.00	\$295.00	\$1,770.00
RB	12/05/2016	11/2016	0.70	\$295.00	\$206.50
RB	01/13/2017	12/2016	12.80	\$295.00	\$3,776.00
2017					
RB	02/06/2017	01/2017	39.30	\$295.00	\$11,593.50
RB	03/08/2017	02/2017	14.10	\$295.00	\$4,159.50
RB	04/12/2017	03/2017	75.00	\$295.00	\$19,173.00
RB	05/04/2017	04/2017	40.50	\$295.00	\$11,947.50
Totals			208.00		\$58,408.00

Combined July 2016 – April 2017				
Firm		Legal Hours	Highest Hourly Rate	Legal Fees
RWG		15.00	\$290.00	\$4,425.00
RB		208.00	\$295.00	\$58,408.00
Totals		223.00		\$62,833.00

EXHIBIT A: SUMMARY OF ATTORNEYS' FEES FILED BY CITY OF COMPTON

RWG May 2017 – April 2018					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2017					
RWG	05/18/2017	04/2017	5.20	\$290.00	\$1,534.00
RWG	06/14/2017	05/2017	32.30	\$290.00	\$9,528.50
RWG	07/11/2017	06/2017	32.40	\$290.00	\$9,558.00
RWG	08/31/2017	07/2017	87.80	\$290.00	\$25,901.00
RWG	10/23/2017	09/2017	0.70	\$290.00	\$206.50
RWG	11/13/2017	10/2017	9.40	\$290.00	\$2,773.00
RWG	12/11/2017	11/2017	0.30	\$290.00	\$88.50
2018					
RWG	02/22/2018	01/2018	11.00	\$290.00	\$3,245.00
RWG	03/27/2018	02/2018	9.40	\$290.00	\$2,773.00
RWG	05/29/2018	04/2018	1.30	\$290.00	\$383.50
Totals			189.80		\$55,991.00

RB May 2017 – April 2018					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2017					
RB	06/14/2017	05/2017	104.90	\$295.00	\$29,493.50
RB	07/13/2017	06/2017	100.10	\$295.00	\$26,013.50
RB	08/10/2017	07/2017	60.80	\$295.00	\$14,264.00
RB	09/15/2017	08/2017	2.10	\$295.00	\$619.50
RB	10/16/2017	09/2017	0.90	\$295.00	\$265.50
RB	11/08/2017	10/2017	7.90	\$295.00	\$2,330.50
RB	12/12/2017	11/2017	11.10	\$295.00	\$3,274.50
RB	01/23/2018	12/2017	0.60	\$295.00	\$177.00
2018					
RB	02/16/2018	01/2018	26.40	\$295.00	\$7,788.00
RB	04/03/2018	02/2018	0.30	\$295.00	\$88.50
RB	05/03/2018	04/2018	1.70	\$295.00	\$501.50
Totals			316.80		\$84,816.00

EXHIBIT A: SUMMARY OF ATTORNEYS' FEES FILED BY CITY OF COMPTON

Combined May 2017 – April 2018				
Firm		Legal Hours	Highest Hourly Rate	Legal Fees
RWG		189.80	\$290.00	\$55,991.00
RB		316.80	\$295.00	\$84,816.00
Totals		506.60		\$140,807.00

Combined May 2018 – June 2019					
Firm	Invoice Date	Month Covered	Legal Hours	Highest Hourly Rate	Legal Fees
2018					
RWG	06/22/2018	05/2018	3.30	\$290.00	\$973.50
RWG	07/31/2018	06/2018	1.10	\$290.00	\$324.50
RWG	09/21/2018	08/2018	0.50	\$290.00	\$147.50
RB	06/15/2018	05/2018	1.50	\$295.00	\$442.50
RB	07/24/2018	06/2018	0.40	\$295.00	\$118.00
RB	08/06/2018	07/2018	4.20	\$295.00	\$1,150.50
RB	10/01/2018	08/2018	31.00	\$295.00	\$9,097.00
RB	11/08/2018	09/2018	16.00	\$295.00	\$4,660.00
RB	11/28/2018	10/2018	84.80	\$295.00	\$24,608.00
RB	01/23/2019	11/2018	109.60	\$295.00	\$31,528.00
RB	02/12/2019	12/2018	111.80	\$295.00	\$31,409.00
2019					
RB	03/06/2019	01/2019	98.30	\$295.00	\$26,382.50
RB	04/09/2019	02/2019	58.10	\$295.00	\$17,139.50
RB	05/08/2019	03/2019	243.50	\$295.00	\$69,420.50
RB	05/28/2019	04/2019	449.08	\$295.00	\$122,458.60
RB	07/09/2019	05/2019	592.20	\$295.00	\$157,179.00
RB	07/15/2019	06/2019	326.70	\$295.00	\$89,536.50
Totals			2,132.28		\$586,575.10

EXHIBIT B

**EXHIBIT B: COMPARING PLAINTIFF'S REQUEST FOR LEGAL FEES TO
DEFENDANT'S LEGAL FEES**

Bradford's Overall Legal Fees for Four Firms					
Firm	Start Date	End Date	Legal Hours	Hourly Rate	Legal Fees
Wesierski & Zurek (WZ)	05/2012	11/2015	3,378.70	\$187.50	\$625,595.00
				\$320.00	\$1,081,184.00
What WZ is asking for				\$800.00	\$2,710,160.00
Kraft Law Firm	10/2015	07/2016	Not specified		
What Kraft is asking for				\$300-450.00	\$250,905.00
Ehrlich*/Schabloski	07/2016	06/2019	1,122.10	\$650.00	\$729,365.00
What Schabloski is asking for					\$1,426,977.50
Total Requested Fees					\$4,393,769.95

* Fees for Ehrlich law firm estimated based upon reconstruction and not based on actual billing records.

Compton's Outside Legal Fees for Two Firms					
Firm	Start Date	End Date	Legal Hours	Hourly Rate	Legal Fees
Richards, Watson, & Gershon (RWG)	10/2013	08/2018	6,764.10	\$290.00	\$1,836,501.50**
Ring Bender (RB)	6/2016	06/2019	2,651.98	\$295.00	\$728,353.60
Totals			9,416.08		\$2,564,855.10

** Legal hours and fees for the 2014 Administrative Hearing have been detracted.

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PROOF OF SERVICE

Bradford v. City of Compton

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is: 3150 Bristol Street, Suite 220, Costa Mesa, CA 92626. My email address is: ljuarez@ringbenderlaw.com

On January 10, 2020, I served the foregoing document(s) described as:

COMPTON’S NOTICE OF FILING SUMMARY OF ATTORNEYS’ FEES INCURRED IN CASE IN RESPONSE TO MOTIONS FOR ATTORNEYS’ FEES BY THREE LAW FIRMS

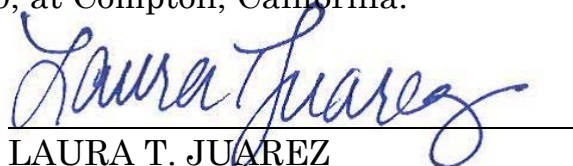
on all interested parties in this action at the address(es) listed in the attached Service List by the following means:

BY MAIL - As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

BY EMAIL - I caused a true copy of the foregoing document(s) to be served by electronic email transmission at the time shown on each transmission, to each interested party at the email address shown in the attached Service List. Each transmission was reported as complete and without error.

STATE - I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 10, 2020, at Compton, California.


LAURA T. JUAREZ

SERVICE LIST

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