





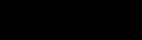
# **EXHIBIT B**

**Open Source Security v. Perens, No. 3:17-CV-04002-LB**  
**UPDATED Summary of Work Performed in 2018**

Timekeeper	Title, Rate, and Qualifications	Narrative	Yearly Hours	Yearly Total
Heather Meeker	<p>Partner</p> <p>██████████</p> <p>Yale University, B.A. 1979  University of California, Berkeley, J.D. 1994</p> <p>Recognized as a top-rated technology expert by <i>The Daily Journal</i>, <i>Northern California Super Lawyers</i>, and <i>Managing IP Magazine</i>; named “San Francisco Information Technology Law Lawyer of the Year” by <i>The Best Lawyers in America</i>; author of <i>Open (Source) for Business: A Practical Guide to Open Source Software Licensing</i></p> <p>More than 23 years of intellectual property and technology experience, with a</p>	<ul style="list-style-type: none"> <li>• <b>Settlement:</b> <ul style="list-style-type: none"> <li>○ Review Plaintiffs’ response to settlement offer</li> </ul> </li> <li>• <b>Motion for Fees:</b> <ul style="list-style-type: none"> <li>○ Confer and direct strategy regarding motion for fees</li> </ul> </li> </ul>	<p><b>Original</b>  ██████</p> <p><b>Adjusted for Additional Revisions:</b>  ██████</p>	<p><b>Original:</b>  ██████████</p> <p><b>Adjusted for Additional Revisions:</b>  ██████████</p>

	focus on Open Source and software licensing matters			
Melody Drummond Hansen	<p>Partner</p> <p>██████████</p> <p>Georgetown University, B.A. 2000 University of Oxford, M.S. 2002 University of Chicago, J.D. 2005</p> <p>Over a decade of civil litigation experience, including representing defendants in defamation matters</p> <p>Has litigated dozens of intellectual property and technology cases, many as lead trial counsel</p>	<ul style="list-style-type: none"> <li>• <b>Settlement:</b> <ul style="list-style-type: none"> <li>○ Direct strategy regarding settlement offer</li> <li>○ Review and revise communications to opposing counsel regarding settlement offer</li> </ul> </li> <li>• <b>Motion for Fees:</b> <ul style="list-style-type: none"> <li>○ Confer and direct strategy regarding motion</li> <li>○ Review and revise motion and supporting documents</li> <li>○ Direct strategy regarding motion to seal</li> </ul> </li> <li>• <b>Motion for Sanctions:</b> <ul style="list-style-type: none"> <li>○ Confer and direct strategy regarding motion</li> <li>○ Review and revise motion and supporting documents</li> </ul> </li> <li>• <b>Ex Parte Motion:</b> <ul style="list-style-type: none"> <li>○ Direct strategy regarding opposition to ex parte motion</li> <li>○ Review and revise opposition to ex parte motion to deem sanctions motion improper</li> <li>○ Direct strategy regarding response to inaccuracies in reply to ex parte motion</li> </ul> </li> <li>• <b>Motion for Fees Reply:</b> <ul style="list-style-type: none"> <li>○ Confer and direct strategy regarding reply brief</li> <li>○ Review and revise reply brief and supporting documents</li> </ul> </li> <li>• <b>Motion for Sanctions Reply:</b> <ul style="list-style-type: none"> <li>○ Confer and direct strategy regarding reply brief</li> <li>○ Review and revise reply brief and supporting documents</li> </ul> </li> <li>• <b>Case Management:</b> <ul style="list-style-type: none"> <li>○ Direct overall litigation strategy</li> </ul> </li> </ul>	<p><b>Original:</b> ██████ w/o Mot. for Sanctions</p> <p>██████ w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b> ██████ w/o Mot. for Sanctions</p> <p>██████ w/ Mot. for Sanctions</p>	<p><b>Original:</b> ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b> ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>

		<ul style="list-style-type: none"> <li>○ Direct strategy regarding dismissal of Plaintiffs' claims without prejudice</li> <li>○ Draft Defendant's response to ex parte motion to enter final judgment</li> <li>○ Meet and confer with opposing counsel regarding ex parte dismissal motion</li> <li>○ Conference with opposing counsel regarding fees and sanctions motions</li> </ul>		
Cara Gagliano	<p>Associate  ██████████r</p> <p>Northwestern University, B.A. 2011  New York University, J.D. 2015</p> <p>More than two years of intellectual property litigation experience, as well as anti-SLAPP, defamation, and tortious interference research experience</p> <p>Focus on First Amendment issues in pro bono and law school experience, including selection as one of seven 2014–2015 Arthur Garfield Hays Civil Liberties fellow, multiple First Amendment-focused legal internships, and</p>	<ul style="list-style-type: none"> <li>● <b>Settlement:</b> <ul style="list-style-type: none"> <li>○ Prepare draft email communicating settlement offer</li> </ul> </li> <li>● <b>Motion for Fees</b> <ul style="list-style-type: none"> <li>○ Conduct research and analyze case law regarding fees recoverable in anti-SLAPP cases</li> <li>○ Conduct research regarding procedure for seeking fees under anti-SLAPP law in light of Plaintiffs' notice of intent not to amend complaint</li> <li>○ Confer regarding motion strategy</li> <li>○ Compile and review comparative rate data in anticipation of drafting motion</li> <li>○ Supervise drafting of motion</li> <li>○ Revise motion and contribute supplemental research and drafting</li> <li>○ Supervise preparation of materials supporting requested fees amount</li> <li>○ Meet and confer with opposing counsel</li> </ul> </li> <li>● <b>Motion for Sanctions:</b> <ul style="list-style-type: none"> <li>○ Conduct legal research</li> <li>○ Supervise and coordinate research regarding procedural issues</li> </ul> </li> </ul>	<p><b>Original:</b>  ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b>  ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>	<p><b>Original:</b>  ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b>  ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>

	<p>coursework on First Amendment and media law</p>	<ul style="list-style-type: none"> <li>○ Revise motion and contribute supplemental research and drafting</li> <li>● <b>Ex Parte Motion:</b> <ul style="list-style-type: none"> <li>○ Review and revise draft opposition motion to deem sanctions motion improper</li> </ul> </li> <li>● <b>Motion for Fees Reply:</b> <ul style="list-style-type: none"> <li>○ Review and analyze Plaintiffs’ opposition brief</li> <li>○ Confer regarding motion strategy</li> <li>○ Conduct supplemental legal research</li> <li>○ Draft and revise motion</li> <li>○ Supervise preparation of materials supporting requested fees amount</li> </ul> </li> <li>● <b>Case Management:</b> <ul style="list-style-type: none"> <li>○ Research appealability and other procedural issues raised by Plaintiffs’ notice of intent not to amend their complaint</li> <li>○ Conference with opposing counsel regarding sanctions motion</li> </ul> </li> </ul>		
<p>Eric Ormsby</p>	<p>Associate    University of Texas at Austin, B.A. 2013  Columbia University, J.D. 2017</p>	<ul style="list-style-type: none"> <li>● <b>Motion for Fees:</b> <ul style="list-style-type: none"> <li>○ Research procedural issues relating to Plaintiffs’ notice of intent not to amend their complaint</li> <li>○ Conduct legal research</li> <li>○ Draft and revise outline of motion</li> <li>○ Draft and revise motion sections</li> <li>○ Draft and prepare documents in support of motion</li> </ul> </li> <li>● <b>Motion for Sanctions:</b> <ul style="list-style-type: none"> <li>○ Conduct legal research</li> </ul> </li> <li>● <b>Ex Parte Motion:</b> <ul style="list-style-type: none"> <li>○ Draft declaration in support of response to ex parte motion to deem sanctions motion improper</li> </ul> </li> <li>● <b>Motion for Fees Reply:</b></li> </ul>	<p><b>Original:</b>   w/o Mot. for Sanctions</p> <p> w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b></p>	<p><b>Original:</b>   w/o Mot. for Sanctions</p> <p> w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b></p>

		<ul style="list-style-type: none"> <li>○ Draft outline of reply motion</li> <li>○ Draft and revise exhibits and accompanying declarations in support of motion</li> </ul>	<p>█ w/o Mot. for Sanctions</p> <p>█ w/ Mot. for Sanctions</p>	<p>█ w/o Mot. for Sanctions</p> <p>█ w/ Mot. for Sanctions</p>
Marissa Rhoades	<p>Associate</p> <p>█</p> <p>Arizona State University, B.A./B.S. 2014</p> <p>University of California, Berkeley, J.D. 2017</p>	<ul style="list-style-type: none"> <li>● <b>Motion for Fees:</b> <ul style="list-style-type: none"> <li>○ Research procedural issues relating to Plaintiffs' notice of intent not to amend their complaint</li> <li>○ Conduct legal research</li> <li>○ Draft and revise motion sections</li> <li>○ Draft and prepare documents in support of motion</li> <li>○ Research procedures for sealing the motion for fees and costs</li> </ul> </li> <li>● <b>Motion for Sanctions:</b> <ul style="list-style-type: none"> <li>○ Conduct legal research</li> <li>○ Draft and revise motion for sanctions and supporting documents</li> </ul> </li> <li>● <b>Ex Parte Motion:</b> <ul style="list-style-type: none"> <li>○ Conduct legal research</li> <li>○ Draft and revise opposition to ex parte motion to deem sanctions motion improper</li> </ul> </li> <li>● <b>Motion for Fees Reply:</b> <ul style="list-style-type: none"> <li>○ Review and analyze opposition brief</li> <li>○ Draft outline of reply motion</li> <li>○ Draft and revise reply motion</li> <li>○ Conduct supplemental research</li> <li>○ Draft and revise sealing motions and supporting documents</li> </ul> </li> <li>● <b>Motion for Sanctions Reply:</b></li> </ul>	<p><b>Original:</b></p> <p>█ w/o Mot. for Sanctions</p> <p>█ w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b></p> <p>█ w/o Mot. for Sanctions</p> <p>█ w/ Mot. for Sanctions</p>	<p><b>Original:</b></p> <p>█ w/o Mot. for Sanctions</p> <p>█ w/ Mot. for Sanctions</p> <p><b>Adjusted for Additional Revisions:</b></p> <p>█ w/o Mot. for Sanctions</p> <p>█ w/ Mot. for Sanctions</p>

		<ul style="list-style-type: none"> <li>○ Review and analyze opposition brief</li> <li>○ Draft outline of reply motion</li> <li>○ Draft and revise reply motion and supporting documents</li> <li>○ Conduct supplemental research</li> <li>● <b>Case Management:</b> <ul style="list-style-type: none"> <li>○ Review and analyze procedural issues relating to Plaintiffs' request for entry of judgment and statement of intent to appeal</li> </ul> </li> </ul>		
Diana Diaz	<p>Case Manager</p> <p>██████████</p> <p>St. Mary's College, B.A. 2000</p> <p>Over 20 years of paralegal experience, with focus on intellectual property and commercial litigation matters</p>	<ul style="list-style-type: none"> <li>● <b>Case Management:</b> <ul style="list-style-type: none"> <li>○ Review court notice regarding entry of final judgment and calendar deadlines</li> </ul> </li> <li>● <b>Motion for Fees</b> <ul style="list-style-type: none"> <li>○ Assist with filing and serving motions</li> </ul> </li> <li>● <b>Motion for Fees Reply</b> <ul style="list-style-type: none"> <li>○ Assist and prepare documents for filing</li> </ul> </li> </ul>	<p><b>Original:</b> ██████████</p> <p><b>Adjusted for Additional Revisions:</b> ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>	<p><b>Original:</b> ██████████</p> <p><b>Adjusted for Additional Revisions:</b> ██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>
<b>TOTAL</b>			<p>██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>	<p>██████████ w/o Mot. for Sanctions</p> <p>██████████ w/ Mot. for Sanctions</p>

<b>TOTAL Adjusted for Additional Revisions:</b>			[REDACTED] w/o Mot. for Sanctions	[REDACTED] w/o Mot. for Sanctions
			[REDACTED] w/ Mot. for Sanctions	[REDACTED] w/ Mot. for Sanctions