

utilizes the same techniques described in my original report first supplement but which also excludes any appeal recontratathavea value in any of these four columns.

I attach to this letter an updated chart showing these numbers is labeled Exhibit C. The columns in this chart have the same name as those appearing atsExthiby original H[SHUW UHSRUW H[FHSW WKDW WKH FROXPQ KHDGLQJV VW the calculation as described in the original expert report and first supplement, and the columns ZLWK KHDGLQJV ODEHORHQG DOURHGH[IFHOX Q&IDQUF X DO WHLV LQ WKH described in the previous paragraphalsosending contemporaneously with thest er the electronic excel spreadsheet I used to make these calculatized SLFK LTVCVWL000002530G ³ Daily ELG AIR-CIR 03.152017- edited by MWarner.xlsx

The attached excel files functionally identicato the file previously produced and described in my first supplemental report, which differences. First, it containus pdated atta (i.e., updated rows in the excel files) ovided by Defense Counsel. Second, I created new columns, appearing at columns AC, AE, AG, and AI. These columns are identical to the columns that precede them, except that the formula excludes any row that has a value in the four aforementioned FROXPQV) RU H[DPSOHConfidetenate all Approvad Confidetenate and AP Denial Fail to Provide LV WKH VDPH DV LQ P \ RULJI & ROXPQ \$& Confidetenate all Gapproval Columns Merits Denial Columns and AP Denia Fail to Provide LV WKH VDPH DV LQ P \ RULJI & ROXPQ \$& Confidetenate all Gapproval Columns Merits Denial Columns and AP Denia Fail to Provide -- AND EXCLUDE rows with value in columns AIR Already Eligible (Z), AIR Appeal Created in Error (AA), AP Resolution Application (BP) and Interchange Resolution % 4 ` LV WKH VDPH DV & ROXPQ \$% H[FHwSI We revultion Bolven y WKH if the four columns referenced above are all empty.

As before, to calculate the values appearing in Exhibit C, one must filter the data by month using the Issue Received Date column (column W).

Based on the foregoing, I updately opinion as follows:

A. Opinion on the Number of Delay Appeals that Involved Underlying Delayed Applications that Were Approved, Denied on the Merits After Being Fully Processed, or Denied for Failure to Respond to a Verification Request from Ma 2015 toFebruary 2017.

From May 1, 2015to February 282017, the State received a total of least15,717 delay appeals that involved be layed application

the appellant was found to not **bli**gible on substantive **gr**unds, or denied because the applicant did not timely respond toverification request. During this period, the State received a monthly average of 14 of these delay appeals related to underlying delayed applications, and in the last three months four hich complete data was available December 2016 and January

EXHIBIT C

Delay Appeals that Involved DelayedApplications that Were Approved, Denied on the Merits, or Denied for Failure to Verify Eligibility

$\mathsf{EXHIBI}\mathbf{\widehat{C}}$

DelayAppealsthat InvolvedDelayedApplicationsthat WereApproved,Deniedon the Merits, or Deniedfor Failureto

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Second Supplement to Expert Report by Mr. Warner

was sent via email to the following counsel of record this April 20, 2017:

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ъ. **Rachel Grossman**