

The Billing Bluebook

Billing Narratives for Litigation Paralegals

Using the 4-Part Narrative Framework

Action | Task | Value | Result

Overview

- **Medical & Employment Records:** Summarization, chronologies, treatment timelines
- **Document Review & Organization:** First-level review, Bates organization, privilege logs
- **Discovery Support:** Response organization, production preparation, subpoena drafting
- **Deposition Support:** Digests, summaries, exhibit preparation (pre-approval required)
- **Trial Preparation:** Exhibit organization, witness files, trial binders
- **Research & Citation:** Factual research, Shepardizing, cite-checking
- **Case Management:** Status reports, chronologies, case file maintenance

The ATVR Framework for Paralegals

Each narrative must include all four components plus VOLUME:

ACTION: What you are doing (Summarize, Organize, Index, Draft, Review)

TASK + VOLUME: What you are working on WITH pages, Bates range, or item count

VALUE: Why it matters / the purpose of your work

RESULT: The end goal - the deliverable or project it supports

MEDICAL & EMPLOYMENT RECORDS

Medical Records Summarization

- **Summarize plaintiff medical records** from [Dr. Smith/Provider] (178 pages) to create treatment timeline for case evaluation report
- **Review and summarize** emergency room records from [Hospital] (45 pages) to identify initial complaints and diagnoses for attorney case analysis
- **Prepare chronological summary** of orthopedic treatment records (312 pages, Bates 001-312) to document treatment progression for damages assessment
- **Summarize and index** physical therapy records from [Provider] (89 pages) to track plaintiff's recovery and compliance for IME preparation
- **Review and extract** key findings from MRI/radiology reports (23 pages) to identify objective injury evidence for expert witness preparation
- **Create medical treatment timeline** from records of 5 treating providers (425 pages total) to establish causation chronology for summary judgment motion
- **Summarize prescription history** from pharmacy records (67 pages) to document medication regimen for damages analysis
- **Review and summarize** mental health treatment records (156 pages) to identify emotional distress claims for defense strategy
- **Prepare provider-by-provider summary** of medical records (892 pages, Bates 001-892) to organize treatment history for mediation preparation
- **Extract and summarize** pre-accident medical history (234 pages) to identify prior injuries for causation defense

Employment Records Summarization

- **Summarize plaintiff employment records** from [Employer] (145 pages) to document wage history for lost income calculations
- **Review and extract** performance evaluations and disciplinary records (78 pages) to assess employment status for damages defense
- **Create earnings timeline** from payroll records (234 pages, Bates 500-734) to calculate lost wages for damages analysis
- **Summarize personnel file** documents (167 pages) to identify pre-existing limitations for causation defense
- **Review and document** workers' compensation claim history (89 pages) to identify prior claims for damages offset

DOCUMENT REVIEW & ORGANIZATION

First-Level Document Review

- **Conduct first-level review** of client documents (Bates 001-425) to identify responsive documents for discovery production
- **Review and categorize** produced documents (1,247 pages) to organize by issue for attorney analysis
- **Screen documents** for relevance and privilege (567 documents) to prepare for attorney privilege review

- **Review and flag** key documents from opposing party production (2,340 pages) to identify important evidence for case strategy
- **Conduct responsiveness review** of client email production (892 emails) to identify documents for supplemental production
- **Review and sort** photographic evidence (156 images) to organize by date and subject for exhibit preparation

Document Organization & Indexing

- **Organize and index** discovery production (Bates 001-1,567) to create searchable document database for litigation team
- **Create document index** of trial exhibits (234 documents) to organize by witness for trial preparation
- **Organize client documents** (Bates 001-425) for production in response to RFP Set One for discovery deadline
- **Index and cross-reference** key documents (178 documents) to link to deposition testimony for summary judgment motion
- **Prepare document inventory** of expert file materials (345 pages) to track documents provided for expert report

Privilege Log Preparation

- **Prepare privilege log entries** for withheld documents (87 documents) to comply with discovery obligations for privilege log production
- **Review and document** privilege basis for withheld communications (134 emails) to support privilege assertions for discovery response
- **Update privilege log** with additional withheld documents (45 new entries) to maintain accurate privilege record for supplemental response

DISCOVERY SUPPORT

Discovery Response Organization

- **Organize documents** responsive to RFP Nos. 1-15 (Bates 001-678) to prepare production for discovery deadline
- **Review and compile** documents responsive to Interrogatory No. 5 (123 pages) to support interrogatory verification for response deadline
- **Prepare document production** in response to subpoena (456 pages, Bates 001-456) to comply with third-party discovery for response deadline
- **Organize supplemental production** documents (Bates 679-892) to update prior responses for supplemental discovery deadline
- **Compile documents** for RFA responses (89 documents) to support admission/denial determinations for discovery response

Discovery Summaries

- **Summarize plaintiff's interrogatory answers** (Sets 1-2, 45 pages); approved by [Adjuster] on [date] to extract key admissions for summary judgment motion

- **Prepare summary chart** of RFA responses from all parties (67 responses); pre-approved to identify undisputed facts for pretrial statement
- **Create comparison chart** of discovery responses across defendants (234 pages); approved by [Adjuster] to identify inconsistencies for cross-examination

Subpoena Preparation

- **Draft records subpoena** to [Hospital/Provider] for plaintiff's treatment records to obtain medical documentation for case evaluation
- **Prepare subpoena duces tecum** to [Employer] for employment records (5 document categories) to obtain wage documentation for damages defense
- **Draft deposition subpoena** for third-party witness [Name] with document requests to compel testimony for discovery completion

DEPOSITION SUPPORT

Deposition Digests (Pre-Approval Required)

- **Prepare page-line digest** of plaintiff [J. Smith] deposition (212 pages) re: liability and damages; approved by [Adjuster] on [date] for summary judgment motion
- **Create topical digest** of [Witness] deposition (156 pages) re: notice issues; pre-approved for motion in limine preparation
- **Prepare summary digest** of corporate representative deposition (189 pages) re: policies and procedures; approved by [Adjuster] for trial preparation
- **Create issue-specific digest** of expert [Dr. Name] deposition (234 pages) re: causation opinions; pre-approved for Daubert motion
- **Prepare impeachment digest** identifying prior inconsistent statements from [Witness] deposition (145 pages); approved for cross-examination preparation

Deposition Preparation Support

- **Organize deposition exhibits** (67 documents, Bates 001-234) to prepare exhibit binder for [Witness] deposition
- **Compile relevant documents** for attorney review (89 documents) to support witness preparation for plaintiff deposition
- **Create document index** for deposition exhibits (45 exhibits) to facilitate efficient examination for expert deposition
- **Prepare witness file** with relevant documents and prior testimony (234 pages) to support attorney preparation for defense witness deposition
- **Organize medical records** chronologically (456 pages) to prepare treatment timeline exhibit for treating physician deposition

Deposition Transcript Review

- **Review and index** deposition transcript (189 pages) to flag key testimony by topic for attorney review
- **Compare deposition testimony** to discovery responses (transcript 156 pages, responses 45 pages) to identify inconsistencies for impeachment preparation

- **Extract and compile** damages-related testimony from deposition (212 pages) to support damages chart for mediation

TRIAL PREPARATION

Exhibit Organization

- **Organize and index** trial exhibits (156 documents) to prepare exhibit list for pretrial submission
- **Prepare trial exhibit binders** (234 exhibits in 5 binders) to organize for courtroom presentation
- **Create exhibit cross-reference chart** linking exhibits to witnesses (89 exhibits, 12 witnesses) for trial organization
- **Organize demonstrative exhibits** (23 charts and timelines) to prepare for trial presentation
- **Compile and organize** medical record exhibits (Bates 001-456) to prepare chronological treatment binder for trial
- **Prepare exhibit foundation chart** identifying sponsoring witness for each exhibit (145 exhibits) for trial logistics

Witness File Preparation

- **Prepare witness file** for [Witness Name] including relevant documents and deposition excerpts (178 pages) for attorney trial preparation
- **Compile impeachment materials** for opposing witnesses (5 witnesses, 234 pages total) to support cross-examination preparation
- **Organize expert witness file** including report, deposition, and supporting documents (312 pages) for expert examination preparation
- **Create witness contact list** with scheduling information (18 witnesses) to coordinate trial logistics

Trial Binder Preparation

- **Prepare trial notebook** with pleadings, key motions, and orders (345 pages) to organize case history for trial reference
- **Compile deposition excerpts** for trial use (12 depositions, 89 designated excerpts) to prepare deposition binder for trial
- **Organize jury instruction materials** including proposed instructions and verdict forms (56 pages) for jury charge preparation
- **Prepare motion in limine binder** with all filed motions and rulings (123 pages) for evidentiary reference at trial

RESEARCH & CITATION

Factual Research

- **Research corporate entity status** of defendant via Secretary of State records to verify proper party identification for pleading accuracy
- **Conduct background research** on expert witness [Name] including publications and prior testimony to support Daubert challenge
- **Research accident scene** including weather and road conditions from public records to support liability defense

- **Compile regulatory history** of defendant from public filings (45 documents) to support compliance defense
- **Research plaintiff's social media** for relevant posts (67 screenshots) to identify inconsistent statements for impeachment

Citation Verification

- **Shepardize cases cited** in summary judgment motion (23 cases) to verify good law for motion filing
- **Cite-check brief** (45 pages, 67 citations) to verify accuracy and formatting for court submission
- **Verify statutory citations** in motion in limine (12 statutes) to confirm current version for motion filing
- **Update case citations** in trial brief (34 cases) to reflect recent decisions for trial submission
- **Shepardize key cases** from opponent's brief (18 cases) to identify negative treatment for reply brief

CASE MANAGEMENT

Chronologies & Timelines

- **Create case chronology** from pleadings, discovery, and documents (156 entries) to establish factual timeline for case analysis
- **Update litigation timeline** with recent events and deadlines (23 new entries) to maintain current case status for team coordination
- **Prepare damages chronology** documenting medical treatment and lost wages (89 entries) to support damages calculations
- **Create liability timeline** from accident through litigation (67 entries) to visualize key events for mediation presentation

Status Reports

- **Prepare case status report** summarizing recent activity and upcoming deadlines to update client for quarterly reporting
- **Compile discovery status chart** tracking outstanding responses and deadlines (34 items) for case management conference
- **Update deposition schedule** with completed and pending depositions (12 witnesses) to track discovery progress for status report

Molly Kremer, Esq. - The Billing Coach - 2026 ~ All Rights Reserved