

Michael A. Caddell (SBN 249469)
mac@caddellchapman.com
Cynthia B. Chapman (SBN 164471)
cbc@caddellchapman.com
Amy E. Tabor (SBN 297660)
aet@caddellchapman.com
CADDELL & CHAPMAN
P.O. Box 1311
Monterrey CA 93942
Tel.: (713) 751-0400
Fax: (713) 751-0906

Attorneys for Plaintiff

Additional attorneys listed on signature page.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

SUNG GON KANG, individually and on
behalf of others similarly situated,

Plaintiff,

v.

CREDIT BUREAU CONNECTION,
INC.,

Defendant.

CASE No. 1:18-cv-01359-SKO

**PLAINTIFF'S NOTICE OF
UNOPPOSED MOTION FOR
ATTORNEYS' FEES AND COSTS
AND FOR APPROVAL OF SERVICE
AWARD AND INDIVIDUAL
SETTLEMENT**

Date: October 25, 2023
Time: 9:30 a.m.
Judge: Hon. Sheila K. Oberto
Room: 7

CASE No. 1:18-cv-01359-SKO

PLAINTIFF'S NOTICE OF UNOPPOSED MOTION FOR
ATTORNEYS' FEES AND COSTS AND FOR APPROVAL OF
SERVICE AWARD AND INDIVIDUAL SETTLEMENT

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE THAT, at 9:30 a.m. on October 25, 2023 or such other date and time as the Court may set, in Courtroom 7 of the above-captioned Court, located at Robert E. Coyle United States Courthouse, 2500 Tulare Street, Sixth Floor, Fresno, California, 93721, Plaintiff will move this Court for preliminary approval of the parties' class action settlement and for the entry of the Proposed Order included herewith.

This motion is based on this Notice of Motion and Motion, a Memorandum of Law and its Exhibits filed contemporaneously herewith, the pleadings, records, and files in this action, and such other matters as may properly come before this Court.

Dated: August 1, 2023

Respectfully submitted,

SUNG GON KANG, by his attorneys,

/s/James A. Francis

James A. Francis (admitted *pro hac vice*)

jfrancis@consumerlawfirm.com

John Soumilas (admitted *pro hac vice*)

jsoumilas@consumerlawfirm.com

Jordan M. Sartell (admitted *pro hac vice*)

jsartell@consumerlawfirm.com

FRANCIS MAILMAN SOUMILAS, P.C.

1600 Market Street, Suite 2510

Philadelphia, PA 19103

Tel.: (215) 735-8600

Fax: (215) 940-8000

Michael A. Caddell (SBN 249469)

mac@caddellchapman.com

Cynthia B. Chapman (SBN 164471)

cbc@caddellchapman.com

Amy E. Tabor (SBN 297660)

aet@caddellchapman.com

CADDELL & CHAPMAN

628 East 9th Street

Houston TX 77007-1722

Tel.: (713) 751-0400

Fax: (713) 751-0906

CERTIFICATE OF SERVICE

I, James A. Francis hereby certify that on August 1, 2023 this document was filed with the Court using the CM/ECF system and thereby served on all counsel of record.

/s/James A. Francis
James A. Francis

Michael A. Caddell (SBN 249469)
mac@caddellchapman.com
Cynthia B. Chapman (SBN 164471)
cbc@caddellchapman.com
Amy E. Tabor (SBN 297660)
aet@caddellchapman.com
CADELL & CHAPMAN
P.O. Box 1311
Monterrey CA 93942
Tel.: (713) 751-0400
Fax: (713) 751-0906

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Plaintiff and Class Representative Sung Gon Kang, by Class Counsel, respectfully submits the following memorandum of law in support of his Unopposed Motion for Motion for Attorneys’ Fees and Costs and for Approval of Service Award and Individual Settlement.

I. INTRODUCTION

It took almost five (5) years, the defeat of multiple dispositive motions, the achievement of class certification, the successful confrontation and navigation of Defendant’s scorched-earth discovery strategy, and finally, a change in defense counsel for Plaintiff and Class Counsel to obtain the excellent settlement achieved in this case. As outlined in Plaintiff’s Motion for Preliminary Approval and the Court’s Order approving it, ECFs 149, 158, this settlement under the Fair Credit Reporting Act, 15 U.S.C. 1681 *et seq.* (FCRA), may be reasonably and humbly considered a home run.

The settlement provides that Class Counsel may move for an award of attorneys’ fees and costs to be paid by Defendant of up to \$1,620,000 pursuant to the FCRA’s mandatory fee-shifting provision, and Class Counsel do so now. 15 U.S.C. 1681n and o; ECF 149-1 at §§ 4.2, 5.3. As set forth in the parties’ agreement, this amount will be paid by Defendant, not by the Class, and will not reduce Class members’ recovery in any way. *Id.* at § 4.2, ¶ 4; *see also* ECF 158, Order Vacating Hearing and Granting Unopposed Motion for Preliminary Approval of Class Action Settlement (“Preliminary Approval Order”), at 7 (noting same). As demonstrated more fully below, the amount sought by Class Counsel is supported by their time and expense records maintained in the ordinary course of practice, and represents less than their total lodestar and expense, a compromise to which Class Counsel agreed in the interest of reaching the proposed settlement, and which they must honor now.

Pursuant to the settlement agreement, Class Counsel also move for a service award for Plaintiff in light of his service to the class, as well as a release of additional, individual claims for which he did not seek class treatment.¹

¹ Plaintiff also asserted claims for failure to disclose all information in the consumer’s file under 15 U.S.C.

II. PROCEDURAL HISTORY

A. The Pleadings and Related Motion Practice

On October 2, 2018, Plaintiff filed this lawsuit on behalf of himself and other similarly situated persons. In his complaint, Plaintiff alleged that Defendant’s association of consumers like himself with individuals on the OFAC list violated the requirements of section 1681e(b) of the FCRA and CAL. CIV. CODE § 1785.14(b) of its state-law analog, the California Credit Reporting Agencies Act (“CCRAA”), which require covered entities to use reasonable procedures to assure the maximum possible accuracy of a consumer report. *See* ECF 1.

On November 9, 2018, Defendant moved to dismiss Plaintiff’s complaint, arguing that it was not a “consumer reporting agency” as defined by the FCRA or a “consumer credit reporting agency” as defined by the CCRAA and that its OFAC reports were not “consumer reports” or “consumer credit reports.” ECF 11 at 4–11. The Court denied Defendant’s motion, holding that the complaint stated a claim because it “sufficiently alleges that Defendant regularly assembled consumer credit information for fees or dues for the purpose of furnishing ‘consumer reports’ or ‘consumer credit reports’ to third parties.” ECF 20 at 8–9.

On April 3, 2019, Defendant filed its answer to the complaint. ECF 21.

B. Rule 23 Written Discovery, Depositions, and Related Motion Practice

From the earliest days of this litigation, Defendant sought to stymie Plaintiff’s attempts to obtain relevant discovery by engaging in obstructive, and often baseless, discovery practices. Class Counsel respectfully asserts that the Court may simply take judicial notice of the docket.

Defendant repeatedly refused to produce basic documents and electronically stored information, refused to present properly noticed witnesses for deposition, and refused to abide by Orders of this Court until it had exhausted every available procedural tactic. Ultimately, Plaintiff

§ 1681g and CAL. CIV. CODE §§ 1785.10 and 1785.15, and for failure to conduct a reasonable reinvestigation of a dispute under 15 U.S.C. § 1681i. After sufficient discovery, Plaintiff did not see class treatment for these claims.

1 was forced to seek the Court's intervention in more than half a dozen discovery disputes,² all of
 2 which were resolved in his favor. A substantial portion of Class Counsel's time in this case was
 3 expended addressing Defendant's refusal to abide by its discovery obligations here. A summary
 4 of these efforts follows.

5 Plaintiff had already served written discovery and document requests on Defendant during
 6 the pendency of Defendant's Motion to Dismiss. Defendant's responses were woefully insufficient
 7 and shot through with baseless objections. Plaintiff was forced to file his first motion to compel
 8 on April 8, 2019. ECF 22.³ After a telephonic discovery dispute hearing on April 25, 2019,
 9 Magistrate Judge Oberto ordered Defendant to produce its contract with and invoices to Norm
 10 Reeves Honda for use in Plaintiff's deposition of Defendant's Chief Operating Officer Darin
 11 Larsen. *See* ECF 26, 27.

12 Plaintiff deposed Darin Larsen on April 30, 2019 and learned a great deal concerning the
 13 completeness (or lack thereof) of Defendant's earlier responses and objections to Plaintiff's
 14 interrogatories and document requests. This culminated in another discovery dispute over the
 15 production of electronically stored information identifying potential class members, namely the
 16 consumer reports that Defendant had prepared for its customers that included an OFAC "Hit" and
 17 related data in Defendant's computer systems. The Court held another telephonic discovery
 18

19 ² *See* ECFs 26, 27 (compelling production of Defendant's contract with Norm Reeves Honda and related
 20 invoices); ECF 37 (compelling further responses from Defendant to Plaintiff's Interrogatory Nos. 5-10 and Requests
 21 for Production Nos. 3 and 7-9 regarding Class Member's consumer reports and related ESI and depositions of
 22 Defendant's employees Frank Larsen, David Daniel, and Leanne Cobb); ECF 44 (overruling defendant's objections
 23 to Order at ECF 37 compelling the production of documents and further response to interrogatories); ECF 51
 24 (compelling production of ESI responsive to Request for Production No. 7 and contemplating Defendant's Motion for
 25 Protective Order concerning whether the information is "not reasonable accessibility because of undue burden or
 cost"); ECF 63 (denying Defendant's Motion for Protective Order); ECF 70 (compelling production of "[a]ll versions
 of the code for [Defendant's] OFAC Information lookup and scoring algorithm" and "[d]ocuments sufficient to show
 a list of tables and fields, including any and all descriptions, for the MariaDB database maintained by Frank
 Larsen[.]"); ECF 71 (overruling Defendant's objections to Order at ECF 63 denying its Motion for Protective Order);
 ECF 132 (denying Defendant's Motion for Limited Discovery from Class Members).

26 ³ Plaintiff withdrew this motion after Magistrate Judge Oberto held a telephonic conference and the parties
 27 agreed to submit their dispute to her for resolution pursuant to her informal discovery dispute process. *See* ECF 44 at
 2-3 (discussing Defendant's submission to this process in connection with the parties' dispute).

1 hearing on September 20, 2019 after which it compelled Defendant to produce the requested
2 reports and data. *See* ECF 34, 36-37.

3 Instead of producing the compelled ESI (and despite having consented to have Magistrate
4 Judge Oberto resolve the parties' discovery dispute), Defendant filed objections to the Court's
5 Order in which it raised entirely new arguments, and requested that District Court Judge Ishii
6 vacate Magistrate Judge Oberto's Order. ECF 38. Plaintiff filed an opposition, ECF 39, and Judge
7 Ishii overruled Defendant's objections on November 8, 2019 in a lengthy Order. ECF 44.⁴

8 Defendant then raised new burdensomeness objections with respect to the compelled ESI
9 via a motion for protective order, in which it argued that compliance with Plaintiff's requests
10 (responses to which had already been compelled) would involve \$3,000,000 in expenses. ECF 56.
11 On April 7, 2020, the Court rejected these arguments and denied Defendant's motion for protective
12 order. ECF 63.

13 Once again, however, Defendant filed objections to the Order, which it styled as a motion
14 for reconsideration. ECF 66. Plaintiff opposed the objections, ECF 67, and the District Court
15 overruled Defendant's objections on May 19, 2020. ECF 71.

16 Meanwhile, Plaintiff had brought another, entirely separate discovery dispute to the Court's
17 attention. *See* ECF 69. The Court held another telephonic discovery conference and, on May 14,
18 2020, ordered Defendant to produce the computer code for Defendant's OFAC matching algorithm
19 and the schema of its database in which it stored the OFAC information it associated with Plaintiff
20 and other consumers. ECF 70.

21 Plaintiff filed additional discovery motions prior to the close of class certification discovery
22 period concerning a dispute that arose concerning the timeliness of certain responses to
23 Defendant's discovery requests, *see* ECF 74, and a corporate representative deposition pursuant to
24 FED. R. CIV. P. 30(b)(6), *see* ECF 78, but was able to resolve these disputes through meeting and
25

26 ⁴ During the pendency of Defendant's objections, Plaintiff moved for an extension of the case management
27 schedule, ECF 42, which Defendant unsuccessfully opposed. *see* ECF 48, 49.

1 conferral with Defendant rather than by Court intervention. *See* ECF 76 (withdrawing motion for
 2 protective order); *see* ECF 79 (parties' stipulation concerning duration and logistics of corporate
 3 representative deposition).

4 On October 29, 2020, Plaintiff took a corporate representative deposition of Defendant via
 5 two witnesses pursuant to FED. R. CIV. P. 30(b)(6), which brought the total number of depositions
 6 taken by Class Counsel of Defendant's employees to five.

7 **C. Defendant's Motion for Summary Judgment**

8 On November 9, 2020, exactly two years after it filed its Motion to Dismiss, Defendant
 9 moved for summary judgment and/or partial summary judgment on all counts, essentially
 10 renewing its earlier arguments at the pleadings stage that it and its reports are not regulated by the
 11 FCRA or CCRAA. *See* ECFs 81, 82. Plaintiff opposed the motion, arguing that Defendant was
 12 indeed an FCRA- and CCRAA-covered entity and that its reports were regulated by those statutes.
 13 ECF 85.⁵

14 On March 4, 2021, the Court denied Defendant's Motion for Summary Judgment. ECF 96.

15 **D. Class Certification Motion Practice**

16 Defendant finally produced the long overdue, compelled ESI on June 16, 2021. As Plaintiff
 17 had long suspected, this data enabled Class Counsel to identify class members, obtain evidence of
 18 third-party publication, and compare the personally identifying information of Class Members to
 19 that available for each of the sanctioned individuals on the OFAC list to which Defendant had
 20 matched them.

21
 22 ⁵ Despite its earlier agreement to defer dispositive motion practice until after class certification and "to conduct
 23 discovery in two phases, focusing first on the elements of FED. R. CIV. P. 23, followed by a motion for class
 24 certification, and focusing second on the merits of the parties' claims and defenses, followed by dispositive motion
 25 briefing," ECF 17 at 7-8, Defendant filed and noticed its motion for summary judgment for hearing on December 14,
 26 2020, precisely 14 days before the deadline for Plaintiff to file his motion for class certification. *See* ECF 63 at 14
 (setting a November 30, 2020 deadline for Plaintiff's motion for class certification). By operation of Local Rule
 230(c), this meant that Plaintiff's opposition to Defendant's motion for summary judgment also fell on November 30,
 2020. On December 21, 2020, the Court denied Plaintiff's motion for class certification without prejudice to first
 address Defendant's motion for summary judgment. ECF 95. Plaintiff filed his Re-Noticed Motion for Class
 Certification on July 14, 2021. ECF 111.

So equipped, Plaintiff filed his Re-Noticed Motion for Class Certification on July 14, 2021. ECF 111. Defendant filed its opposition on August 11, 2021, and Plaintiff filed a reply on September 1, 2021. ECFs 116, 117.

E. The Parties' First Mediation

After class certification briefing was complete, but before the Court issued its ruling, the parties attended an all-day mediation session with Judge William Cahill (ret.), a JAMS neutral and mediator, via videoconference on September 21, 2021. Notwithstanding the parties' good faith efforts and many hours of preparation, including the drafting of detailed mediation memoranda, they did not reach an accord.

F. Class Certification and Notice

On March 4, 2022, the Court granted in part and denied in part Plaintiff's Re-Noticed Motion for Class Certification. ECF 121. The Court certified a Rule 23(b)(3) class under FCRA section 1681e(b) for statutory damages (the "FCRA Class"), namely:

All individuals about whom Defendant prepared a report that (1) included an OFAC "Hit;" (2) was published to a third party from October 2, 2013 to March 4, 2022; and, (3) included a U.S. address (including U.S. Territories) for that individual.

ECF 121 at 17. The Court also certified a Rule 23(b)(2) class under CCRAA section 1785.14(b) for injunctive relief only (the "CCRAA Class"),⁶ namely:

All individuals about whom Defendant prepared a report that (1) included an OFAC "Hit;" (2) was published to a third party from October 2, 2011 to March 4, 2022; and (3) included a U.S. address (including U.S. Territories) for that individual.

*Id.*⁷ Finally, the Court appointed Plaintiff Sung Gon Kang as Class Representative and Plaintiff's counsel, Caddell & Chapman and Francis Mailman Soumilas, P.C., as Class Counsel. *Id.* at 18.

⁶ The Court declined to certify Plaintiff's CCRAA claims for statutory punitive damages. ECF 121 at 16.

⁷ The distinction between the two classes arises from the CCRAA's 7-year statute of limitations, CAL. CIV. CODE § 1785.33, which is longer than the FCRA's 5-year statute of limitations, 15 U.S.C. § 1681p.

On June 23, 2022, Defendant supplemented its earlier ESI production with information and documents concerning Class Members about whom Defendant had prepared a consumer report with an OFAC Hit within the class period, *i.e.*, through March 4, 2022.

After obtaining bids from multiple notice administrators, *see* ECF 122 at 3, Class Counsel selected Continental Datalogix (“CDLx”) to prepare a notice website, www.KangClassAction.com, and to send notice to the 1,071⁸ members of the FCRA Class. CDLx sent notice via email and regular mail in early September 2022. No member of the FCRA Class opted out.

G. Post-Certification Discovery and Related Motion Practice

On July 14, 2022, the parties submitted competing discovery proposals for the merits phase of this matter. *See* ECF 122. Although Plaintiff believed that merits and expert discovery could be completed within approximately 3 months, *see id.* at 3-5, Defendant proposed a much lengthier, 11-month period during which it proposed seeking discovery from its 247 customers and all Class Members, *see id.* at 5-6. On July 18, 2022, the Court held a telephonic scheduling conference, *see* ECF 124, and on July 22, 2022, it entered a Scheduling Order that split the difference between the parties’ proposals. ECF 125.

Beginning in September 2022, Defendant served subpoenas on a number of its automobile dealer customers for documents and deposition testimony.⁹ The depositions of two such customers,

⁸ Although the precise number of class members was unknown at the time of class certification, Class Counsel subsequently asked data analyst Jonathan Jaffe, *see* ECF 57-2 (Declaration of Jonathan Jaffe submitted in support of Plaintiff’s Opposition to Defendant’s Motion for Protective Order and setting forth Mr. Jaffe’s qualifications), to prepare an automated means of parsing the contents of the consumer reports Defendant produced electronically in discovery to determine which reports included an OFAC “Hit” and were prepared for and published to a third party within the class period. This process not only resulted in an ascertainable group for the purposes of providing notice, but it also ensured that each FCRA Class member has Article III standing for the recovery of statutory damages. *See TransUnion LLC v. Ramirez*, ___ U.S. ___, 141 S. Ct. 2190, 2210-11 (2021) (holding that individuals for whom there was evidence of publication of inaccurate information to a third party had Article III standing).

⁹ These were Conant Auto Retail Group, which includes the Norm Reeves Honda dealership that obtained the consumer report about Plaintiff; Crowley Car Company; Ed Martin Automotive Group; First Auto Groups LLC; Van Housen’s Motors; Fletcher Jones Management Group, Inc.; Lithia Motors, Inc.; McGovern Auto Group Corp Services, Inc.; and Canoga Imports, LLC.

McGovern Auto Group and Van Housen's Motors, took place on December 2 and 5, 2022, respectively. Two others, Fletcher Jones Management Group, Inc. and Lithia Motors, Inc., served objections to the subpoenas. Defendant did not pursue enforcement of the remaining subpoenas.

Defendant also sought—unsuccessfully—to obtain discovery directly from Class Members. It initially broached this topic with Class Counsel in September 2022, proposing to have Class Counsel serve a number of interrogatories on Class Members, but Class Counsel declined. On October 14, 2022, Defendant filed a Motion for Limited Discovery by which it sought to obtain the Court's imprimatur for its invasive and irrelevant discovery requests in this opt-out class action under Rule 23. On October 26, 2022, the parties filed their joint statement of discovery dispute. ECF 130. On November 6, 2022, the Court denied Defendant's motion. ECF 132.

H. The Parties' Second and Third Mediations and Documentation of the Settlement

At long last, the stage was set for the parties to engage in productive settlement negotiations. In February 2023, the parties engaged the services of Rodney A. Max of Upchurch Watson White and Max Mediation Group. After two formal mediation sessions with Mr. Max, the parties were able to arrive at a settlement. They apprised the Court of this development on February 23, 2023 and requested time to document their agreement and prepare preliminary approval paperwork. *See* ECF 138.

III. LEGAL STANDARD

While the proposed settlement preliminarily approved by this Court provides a contractual basis for an award of attorneys' fees and costs here, the underlying justification for that award in this case arises from the fee-shifting provisions of the FCRA. 15 U.S.C. §§ 1681n(a)(3).

Congress provided the FCRA's fee-shifting provisions "to enhance enforcement of important civil rights, consumer-protection, and environmental policies," *Tolentino v. Friedman*, 46 F.3d 645, 6523 (7th Cir. 1995), by private litigants like Plaintiff here. *See also City of Riverside v. Rivera*, 477 U.S. 561, 574–575 (1986) ("A fee-shifting provision's purpose is to encourage private litigants to enforce the laws that protect the public in areas like civil rights, *consumer*

1 *protection and the environment.”*) (emphasis added); *Bryant v. TRW, Inc.*, 689 F.2d 72, 80 (6th
 2 Cir. 1982) (“We have no doubt that Congress intended in authorizing attorney’s fees in lawsuits
 3 under the FCRA...to make use of the private attorney general concept.”). Courts consider an award
 4 of attorneys’ fees and costs mandatory in successful FCRA cases. *Holman v. Experian Info. Sols.,*
 5 *Inc.*, No. 11-CV-0180 CW (DMR), 2014 WL 7186207, at *3–4 (N.D. Cal. Dec. 12, 2014) (FCRA
 6 fee-shifting provision “virtually identical to the fee provisions in the Truth in Lending Act and the
 7 Fair Debt Collection Practices Act, which the Supreme Court and various Circuits have held to be
 8 mandatory.”) (citations omitted).

9 The Ninth Circuit has instructed that, “[t]he lodestar method is generally the correct method
 10 for calculating attorneys’ fees under a fee-shifting statute such as the FCRA.” *Yeagley v. Wells*
 11 *Fargo & Co.*, 365 F. App’x 886, 886–87 (9th Cir. 2010) (citing *Staton v. Boeing Co.*, 327 F.3d
 12 938, 965 (9th Cir. 2003)); *see also Jordan v. Multnomah County*, 815 F.2d 1258, 1262 (9th Cir.
 13 1987) (“The most useful starting point for determining the amount of a reasonable fee is the
 14 number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.”)
 15 (citation omitted).

16 There is a strong presumption that the lodestar figure represents a reasonable fee. *Hensley*
 17 *v. Eckerhart*, 461 U.S. 424, 434 n.9 (1983). This is especially true when, as in this case, the
 18 litigation has achieved practice changes that redound to the benefit of the public at large. *See, e.g.,*
 19 *In re Bluetooth Headset Prod. Liab. Litig.*, 654 F.3d 935, 941 (9th Cir. 2011) (“The “lodestar
 20 method” is appropriate in class actions brought under fee-shifting statutes . . . where the relief
 21 sought—and obtained—is often primarily injunctive in nature and thus not easily monetized, but
 22 where the legislature has authorized the award of fees to ensure compensation for counsel
 23 undertaking socially beneficial litigation.”) (citations omitted); *see also Vizcaino v. Microsoft*
 24 *Corp.*, 290 F.3d 1043, 1049 (9th Cir. 2002) (“Incidental or nonmonetary benefits conferred by the
 25 litigation are a relevant circumstance.”). This recognizes that the efforts of Class Counsel
 26
 27

1 established the entire settlement, including non-monetary benefits, for the benefit of the entire
2 Class.

3 With these principles in mind, a number of district courts have approved fee requests in
4 FCRA class actions based upon the lodestar method as reasonable. For example, in approving an
5 FCRA class action settlement that created a class distribution fund of \$375,000 and an attorneys
6 fees' fund of \$450,000, approving class counsel's requested fee of \$450,000 based upon
7 documented lodestar of approximately \$489,000. *Arnold v. DMG Mori USA, Inc.*, No. 18-CV-
8 02373-JD, 2022 WL 18027883, at *5 (N.D. Cal. Dec. 30, 2022) ("It is an extremely rare day when
9 the Court will approve a settlement where the lawyers get more money than the victims. The Court
10 does so here mainly because a substantial number of other district courts have determined that the
11 disparity is driven by the unique properties of FCRA actions."); *see also Watkins v. Hireright, Inc.*,
12 No. 13-CV-1432-BAS-BLM, 2016 WL 5719813, at *2 (S.D. Cal. Sept. 30, 2016) (approving
13 request for \$655,000 in attorneys' fees, which was below lodestar, and \$60,000 in costs, when
14 class's recovery was a separate \$460,000); *Syed v. M-I LLC*, No. 1:14-cv-00742-WBS-BAM, 2019
15 WL 3564467, at *8 (E.D. Cal. Aug. 6, 2019) (awarding \$299,809 in attorneys' fees when class's
16 recovery was approximately \$256,000); *Lopez v. CIT Bank, N.A.*, No. 15-cv-00759-BLF, 2016
17 WL 3163175, at *9 (N.D. Cal. June 7, 2016) (granting \$78,795 in attorneys' fees when class's
18 recovery was \$50,000). *See also Ramirez v. Trans Union, LLC*, No. 12-CV-00632-JSC, 2022 WL
19 17722395, at *10 (N.D. Cal. Dec. 15, 2022) (using lodestar method to calculate attorneys' fees
20 and approving request equivalent to 45% of total sums set aside for class action settlement).

21 **IV. ARGUMENT AND AUTHORITIES**

22 **A. The Court Should Award Attorneys' Fees Based on Class Counsel's Lodestar**

23 A lodestar calculation should be used "when special circumstances indicate that the
24 percentage recovery would be either too small or too large in light of the hours devoted to the case
25 or other relevant factors." *Six Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301, 1311 (9th
26 Cir. 1990). Given the especially aggressive defense of this case, this matter presents such special

1 circumstances and justifies an award of attorneys' fees in the amount of \$1,620,000. This amount
 2 is 91.3% of Class Counsel's total lodestar of \$1,690,145.50, which includes anticipated time going
 3 forward through final approval, as set forth in the attached declarations of Class Counsel. *See*
 4 Ex. 1, Francis Decl., at ¶ 31 (1,478.1 hours and \$834,788.00 in lodestar for Francis Mailman
 5 Soumilas, P.C.); Ex. 2, Caddell Decl., at ¶¶ 34-35 (1,011.9 hours and \$855,357.50¹⁰ in lodestar for
 6 Caddell & Chapman). The Court should grant Class Counsel's request for attorneys' fees and
 7 costs.

8 1. *Class Counsel Incurred a Reasonable Number of Hours Prosecuting this Matter*

9 As this Court knows well, this case was hotly contested from the very beginning. *See supra*
 10 § II; *see also* Ex. 1, Francis Decl. at ¶¶ 13-24; Ex. 2, Caddell Decl., at ¶¶ 30-35. Nevertheless,
 11 Class Counsel took pains to staff this matter appropriately while persistently pushing back against
 12 Defendant's extreme tactics. *See* Ex. 1, Francis Decl., at ¶¶ 28-29; Ex. 2, Caddell Decl., at ¶ 32.
 13 The award Class Counsel now seeks is the result of efficient staffing in response to stonewalling
 14 that would have prevented Plaintiff from identifying Class members and undermined his efforts to
 15 successfully certifying this case as a class action. Now the bill has come due.¹¹

16 2. *Class Counsel's Hourly Rates Are Reasonable*

17 Class Counsel has decades of experience in consumer class actions in general and those
 18 brought under the FCRA in particular, and have been commended by federal courts throughout
 19 the country over many years for their litigation proficiency, expertise, and high quality work
 20 product.¹² And, because the Ninth Circuit has instructed courts to assess the reasonableness of

21 ¹⁰ This figure includes \$60,000 of anticipated time. *See* Ex. 2, Caddell Decl., at ¶ 35.

22 ¹¹ Pursuant to this Court's request for "detailed billing records and an itemized summary of each category of
 23 costs," ECF 153 at 15, Class Counsel have attached such records to their contemporaneously submitted declarations.
 24 *See* Ex. 1, Francis Decl., at Ex. A (billing records), Ex. B (categorized costs); Ex. 2, Caddell Decl., at Ex. A (billing
 records), Ex. B (categorized costs).

25 ¹² *See, e.g., Barel v. Bank of America*, 255 F.R.D. 393, 398-99 (E.D. Pa. 2009) (finding firm "competent,
 26 experienced and well-qualified to prosecute class actions" and noting that class counsel "have done an excellent job
 27 in representing the class in the instant litigation."); *Martinez v. Avantus, LLC*, __ F.R.D. __, 2023 WL 112807, *9 (D.
 Conn. Jan. 5, 2023)(firm "has substantial experience in class action litigation, including FCRA class actions....[and]
 demonstrated proficiency at all stages of suit"); *Ramirez v. Trans Union, LLC*, 2022 WL 17722395 (N.D. Cal. Dec.

attorneys' hourly rates with reference to "all attorneys in the relevant community engaged in 'equally complex Federal litigation,' no matter the subject matter," *Prison Legal News v. Schwarzenegger*, 608 F.3d 446, 455 (9th Cir. 2010) (citing *Blum v. Stenson*, 465 U.S. 886, 895 n.11 (1984) (noting that a rates are reasonable if they "are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience and reputation"), it is appropriate that this Court to rely upon the decisions of other courts in similar matters for guidance as to the reasonableness of Class Counsel's hourly rates in this matter.

FMS and Caddell & Chapman occupy a niche in the relatively small community of plaintiffs' lawyers that undertake complex credit reporting class action litigation like this matter and charge competitive rates that are supported by the market given their years of experience and expertise. *See* Ex. 1, Francis Decl., at Ex. D, Reich Report, at 4-6 (noting that FMS "was one of the first firms to have a significant legal practice concentrating in federal fair credit reporting, fair debt collection and consumer class actions" and citing selection of accomplishments, including multi-million-dollar recoveries at trial and in settlement); *id.* at 7 (discussing FMS's stature in consumer protection legal community); *see also* Ex. 2, Caddell Decl., at ¶¶ 17-26 (highlighting Caddell & Chapman's extensive trial experience), *id.* at ¶¶ 27 (noting that Caddell & Chapman has obtained more than 90 recoveries valued at \$1 million or more).

15, 2022)("Courts have consistently recognized Francis Mailman Soumilas 'for its expertise in FCRA litigation and the high caliber of its work for the classes it represents.'"); *Der Hacopian v. SentryLink*, C.A. 18-3001 (ECF 66) (D. Md., Nov. 23, 2020 Hearing Transcript) (firm "many, many times in the past has been found to be not just qualified or competent, but extremely well-qualified and competent to represent consumer classes in many, many other jurisdictions, not only this particular jurisdiction"); *Flores v. Express Services, Inc.*, C.A. No.14-3298, 2017 WL 1177098, at *3 (E.D. Pa. Mar. 30, 2017) (firm "has extensive experience in consumer class action litigation"); *White v. Equifax Info. Solutions*, No. 05-01070, 2014 WL 1716154, at *13, 19, 22 (C.D. Cal. May 1, 2014), *aff'd sub nom. Radcliffe v. Equifax Info. Sol'ns., Inc.*, 818 F.3d 537, 548 (9th Cir. 2016) (appointing FMS, Caddell & Chapman, and their team as interim class counsel over objections from a competing national law firm (Boies Schiller) because firm's team's "credentials and experience [we]re significantly stronger in class action and FCRA litigation."); *Patel v. Trans Union, LLC*, 308 F.R.D. 292, 307 (N.D. Cal. 2015) (FMS "have represented consumer classes in many cases in many districts . . . [and] have shown their proficiency in this case[.]"); *Kelly v. Business Information Group*, C.A. 15-6668, 2019 WL 414915 (E.D. Pa. 2019) (firm "qualified and experienced attorneys" --- Francis & Mailman, P.C., of Philadelphia . . . who have substantial experience in class action and FCRA consumer litigation and who are qualified to conduct the litigation."); and *Larson v. Trans Union, LLC*, C.A. 12-cv-05726, 2015 WL 3945052, at *12 (N.D. Cal. June 26, 2015) (appointing firm as class counsel on contested motion).

The rates that Class Counsel seek for their representation of the Class here are:

Timekeeper and Title	Years of Experience	Hourly Rate
Michael A. Caddell, Senior Partner	44	\$1,075
James A. Francis, Shareholder	28	\$905.00
Cynthia B. Chapman, Senior Partner	33	\$850.00
John Soumilas, Shareholder	24	\$805.00
Amt E. Tabor, Junior Partner	20	\$750.00
Jordan M. Sartell, Associate	11	\$465.00
Lauren KW Brennan, Associate	11	\$465.00
Kathy Kersh, Senior Paralegal	33	\$375.00
Jeffrey Kabacinski, Senior Paralegal	25	\$305.00
Felicia Labbe, Junior Paralegal	13	\$175.00

These rates are reasonable because this case involved specialized skill in complex class action FCRA litigation, for which the relevant community is a small handful of firms like Class Counsel that have experience handling such matters. These firms handle FCRA cases on a nationwide basis, as most local legal communities do not have lawyers with the relevant experience. *See Catholic Soc. Servs., Inc. v. Napolitano*, 837 F. Supp. 2d 1059, 1076 (E.D. Cal. 2011) (“Given the prevailing market rates for specialized and highly experienced private civil rights and immigration attorneys specializing in complex litigation, the court determines that the \$500 per hour fee sought by Plaintiffs is “in line with those [rates] prevailing in the community

for similar services by lawyers of reasonably comparable skill, experience, and reputation.”); *In re Cook Med., Inc., Pelvic Repair Sys. Prod. Liab. Litig.*, 365 F. Supp. 3d 685, 701 (S.D.W. Va. 2019) (When selecting an hourly rate for determining legal fees the court cannot consider just one market because “‘the relevant legal community’ is one national in nature . . . [and the court will] consider those rates selected in similar MDLs.”).¹³

Thus, it comes as no surprise that Class Counsel’s hourly rates have been repeatedly approved by other federal courts in comparable litigation. Ex. 1, Francis Decl. at ¶ 26 n.1;¹⁴ Ex. 2, Caddell Decl. at ¶ 36. As the Seventh Circuit observed, “providing competitive rates” that “assure attorneys take such cases” is part of “increase[ing] the likelihood that the congressional policy of redressing public interest claims will be vindicated.” *Tolentino*, 46 F.3d at 652-3. Class Counsel’s experience and reputation no doubt contributed to their ability to obtain the excellent result achieved for the Class in this matter.

3. Reasonableness Factors Favor Approval of Class Counsel’s Request

Once it has determined the lodestar, a district court may adjust it either upwards or downwards based upon “reasonableness” factors first announced in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975).¹⁵ Although Class Counsel does not seek an upward

¹³ This focus on the relevant “community” of specialized consumer class action firms like Class Counsel chimes with the Ninth Circuit’s consistent instruction to employ attorneys’ current hourly rates to address the delay in payment associated with the lengthy pendency of complex matters like this one. *See Stanger v. China Elec. Motor, Inc.*, 812 F.3d 734, 740 (9th Cir. 2016) (failure to compensate attorneys for delay in payment is an abuse of discretion); *Wit v. United Behav. Health*, 578 F. Supp. 3d 1060, 1075 (N.D. Cal. 2022) (“Here, the Court finds that Plaintiffs’ request that the lodestar be calculated using current rates to account for the nearly six-year delay in compensation is reasonable.”); *Parkinson v. Hyundai Motor Am.*, 796 F. Supp. 2d 1160, 1174 (C.D. Cal. 2010) (“To account for delay in payment from time of billing to time of award, the Court may augment an award based on historical billing rates, plus interest for the delay, or adjust the award by using current billing rates.”).

¹⁴ Moreover, in the case of FMS, they are set in consultation with an outside law firm. *See* Ex. D, Reich Declaration, to Ex. 1, Francis Decl. FMS delegates the task of setting its customary hourly rates to an outside law firm, Fox Rothschild. Its rates are based, in part, on FMS’s extensive experience in FCRA class actions, and federal courts across the country have relied upon the Reich Declaration with respect to FMS’s hourly rates. Ex. 1, Francis Decl., at ¶ 26 n. 1.

¹⁵ These are (1) the time and labor required; (2) the novelty and difficulty of the questions involved; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation,

adjustment of their lodestar and does not believe that a downward adjustment is appropriate, a survey of these factors underscore the reasonableness of Class Counsel's request.

The most important *Kerr* factor is the benefit obtained for the class. *In re Bluetooth*, 654 F.3d at 941–42 (citing *Hensley*, 461 U.S. at 434–36). Having obtained the maximum statutory damages relief available under the FCRA for Class members, it is plain that Class Counsel's efforts resulted in a substantial benefit for the FCRA Class. Moreover, the requested award represents only 93% of Class Counsel's lodestar, underscoring its reasonableness. *Moreno v. Capital Bldg. Maint. & Cleaning Servs.*, No. 19-cv-07087-DMR, 2021 WL 4133860, at *6 (N.D. Cal. Sep. 10, 2021) ("A negative multiple 'strongly suggests the reasonableness of [a] negotiated fee.'") (citation omitted).

B. The Court Should Award Class Counsel Their Reasonable Litigation Costs

Non-taxable costs are appropriately awarded as part of the requested award of attorneys' fee award under the FCRA's fee-shifting provision. *Grove v. Wells Fargo Fin. California, Inc.*, 606 F.3d 577, 583 (9th Cir. 2010).

As set forth in their declarations, Class Counsel incurred \$77,613.38 in litigation expenses. The largest expense categories include mediation fees, which led to the resolution of this matter, and fees for expert analysis of Defendant's electronically stored information by Jonathan Jaffe, and for analysis and testimony from Duncan Levin of Tucker Levin PLLC.¹⁶ See Ex. 1 at ¶ 37; Ex. 2 at ¶ 37.

C. The Court Should Approve Plaintiff's Service Award and Individual Settlement

The proposed settlement also provides that Defendant will pay up to \$15,000 to Plaintiff as a Service Award in recognition of his multi-year service to the Class and broad, general release of all claims. ECF 149-1 at §§ 4.2, 4.3.2. In general, such awards are meant to "compensate class

and the ability of the attorneys; (10) the 'undesirability' of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Kerr*, 526 F.2d at 70.

¹⁶ Mr. Levin submitted a declaration in support of in support of Plaintiff's Re-Noticed Motion for Class Certification, ECF 111, concerning, *inter alia*, the inaccuracy of Defendant's OFAC matches. ECF 111-22.

representatives for work done on behalf of the class, to make up for financial or reputational risk undertaking in bringing the action, and, sometimes, to recognize their willingness to act as a private attorney general.” *Rodriguez v. West Publ’g Corp.*, 563 F.3d 948, 958–59 (9th Cir. 2009). All three of these factors support approval of Mr. Kang’s Service Award.

First, Mr. Kang made substantial contributions to this litigation, participating actively in discovery by providing documents to Class Counsel and preparing for and sitting for a lengthy deposition for which he had to take time off from work. Second, while Mr. Kang may not have suffered and reputation risk vis a vis Defendant as employees suing their employer might, he did risk further reputation harm arising from Defendant’s matching procedures, which went unchanged until the last days of this matter. Indeed, Defendant even prepared another inaccurate OFAC Hit report about him during the pendency of this action when he went to another car dealership which, unbeknownst to him, was one of Defendant’s customers. *See* Ex. 1, Francis Decl., at Ex. E. Third, Mr. Kang’s contribution to the sea change in Defendant’s procedures warrants recognition.

In its Preliminary Approval Order, this Court expressed some about the amount of the Service Award, noting that it “is 15 times higher than \$1,000 payment to each FRCA Class Member and comprises over one percent of the total amount paid to the FRCA Class.” ECF 158 at 153 n.11. While it is true that Mr. Kang’s Service Award represents 1.4%¹⁷ of the \$1,071,000 that will be paid to members of the FCRA Class, this amount does not create any conflict with Class members because, as with the award of attorneys’ fees and litigation costs, Defendant will fund the Service Award separate and apart from the statutory damages relief available to each Class member. *Id.* at § 4.2, ¶ 3; *see also Radcliffe v. Experian Info. Sols. Inc.*, 715 F.3d 1157, 1165

¹⁷ By comparison, the court in *Sanchez v. Frito-Lay, Inc.*, was concerned that the requested service award constituted 2.5 percent of the gross settlement funds. No. 1:14-CV-00797 AWI, 2015 WL 4662636, at *21 (E.D. Cal. Aug. 5, 2015), *report and recommendation adopted*, No. 1:14-CV-797-AWI-MJS, 2015 WL 5138101 (E.D. Cal. Aug. 26, 2015). If Mr. Kang’s Service Award were considered in the same context, it would constitute approximately half of one percent of the \$2,750,000.00 Defendant has agreed to pay under the various provisions of section 4.2 of the Settlement Agreement, ECF 149-1.

(9th Cir. 2013) (noting concern that \$5,000 service award, which was more than 192 times greater than the \$26 class members would receive, would create a conflict between class representatives and class members, undermining adequacy). Moreover, just like Class Counsel, Mr. Kang has patiently waited for nearly five years for this matter to be resolved, during which period he has received no money and no correction to his consumer file, as evidenced by the second OFAC Hit report. Ex. 1, Francis Decl., at Ex. E.

The reasonableness of the requested Service Award is further underscored by Mr. Kang's release of multiple valuable claims for which he did not seek class treatment. *See* ECF 1 at 14-15 (Counts I, II, and V); ECF 149-1 at § 4.3.2 (setting forth Kang's general release).

In sum, this Court should approve the requested \$15,000 Service Award for Mr. Kang in recognition of his willingness to participate actively in this litigation on behalf of more than 1,000 similarly situated consumers and substantially delay any compensation from his claims.

V. CONCLUSION

WHEREFORE, Plaintiff requests that the Court enter an Order (1) awarding Class Counsel their reasonable attorneys' fees and litigation costs in the amount of \$1,620,000 as set forth in the Settlement Agreement and (2) awarding Plaintiff \$15,000 in recognition of his service to the Settlement Class and release of all claims, including his three individual claims.

1 Dated: August 1, 2023

Respectfully submitted,

2 SUNG GON KANG, by his attorneys,

3 /s/James A. Francis

4 James A. Francis (admitted *pro hac vice*)

jfrancis@consumerlawfirm.com

5 John Soumilas (admitted *pro hac vice*)

jsoumilas@consumerlawfirm.com

6 Jordan M. Sartell (admitted *pro hac vice*)

jsartell@consumerlawfirm.com

7 FRANCIS MAILMAN SOUMILAS, P.C.

1600 Market Street, Suite 2510

8 Philadelphia, PA 19103

9 Tel.: (215) 735-8600

Fax: (215) 940-8000

10 Michael A. Caddell (SBN 249469)

mac@caddellchapman.com

11 Cynthia B. Chapman (SBN 164471)

cbc@caddellchapman.com

12 Amy E. Tabor (SBN 297660)

aet@caddellchapman.com

13 CADDELL & CHAPMAN

628 East 9th Street

14 Houston TX 77007-1722

15 Tel.: (713) 751-0400

16 Fax: (713) 751-0906

CERTIFICATE OF SERVICE

I, James A. Francis, hereby certify that on August 1, 2023 this document was filed with the Court using the CM/ECF system and thereby served on all counsel of record.

/s/James A. Francis

James A. Francis

EXHIBIT 1

Michael A. Caddell (SBN 249469)
mac@caddellchapman.com
Cynthia B. Chapman (SBN 164471)
cbc@caddellchapman.com
Amy E. Tabor (SBN 297660)
aet@caddellchapman.com
CADDELL & CHAPMAN
P.O. Box 1311
Monterrey CA 93942
Tel.: (713) 751-0400
Fax: (713) 751-0906

Attorneys for Plaintiff

Additional attorneys listed on signature page.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

SUNG GON KANG, individually and on
behalf of others similarly situated,

Plaintiff,

v.

CREDIT BUREAU CONNECTION, INC.,

Defendant.

CASE No. 1:18-cv-01359-SKO

**DECLARATION OF
JAMES A. FRANCIS**

1 I, James A. Francis, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am an attorney and founding shareholder of the firm of Francis Mailman
3 Soumilas, P.C. (“FMS”), and one of the lawyers representing Plaintiffs in this matter. I make the
4 following declaration based upon my personal knowledge.

5 2. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania,
6 and admitted to practice in the following additional jurisdictions:

- 7 • New Jersey state court;
- 8 • United States Courts of Appeal for the First, Second, Third, Fourth, Sixth, Seventh,
9 Ninth and Eleventh Circuits;
- 10 • United States District Courts for the Eastern District of Pennsylvania, Middle
11 District of Pennsylvania, District of New Jersey, Eastern District of Michigan,
12 Northern District of Oklahoma; and
- United States Supreme Court

13 3. I have been practicing consumer litigation, with an emphasis on Fair Credit
14 Reporting litigation and consumer class actions, for the past 25 years. I have been recognized by
15 my peers for my advocacy and work throughout my career, including being ranked as a Top 100
16 Superlawyer for Pennsylvania and Philadelphia on many occasions including just recently in 2023,
17 being profiled in Law360’s *Titans of the Plaintiff’s Bar* in 2014, being awarded the Equal Justice
18 Award by Community Legal Services of Philadelphia in 2014 and being inducted into the
19 American College of Consumer Financial Services Lawyers in 2023.

20 4. I have been certified to serve as class counsel in over 70 cases by courts throughout
21 the country.

22 5. I was trial and appellate counsel in the landmark FCRA Supreme Court case *Trans*
23 *Union v. Ramirez*, 141 S.Ct. 2190 (2021).

24 6. I regularly lecture on FCRA litigation and consumer class actions for continuing
25 legal education programs throughout the country. More information about my background and
26 experience may be found in the attached firm biography. **Exhibit C.**

Firm Information and Qualifications

7. FMS is one of the nation’s preeminent consumer protection litigation firms. The firm has obtained numerous ground-breaking legal decisions, record jury verdicts and large consumer settlements. In 2017, FMS obtained a record \$60 million dollar class action verdict for a case tried under the Fair Credit Reporting Act. The case ultimately went to the United States Supreme Court, which resulted in a 5-4 remand decision that has become a landmark case in civil litigation concerning the issue of constitutional standing. The firm has been certified to serve as class counsel in over 70 consumer class actions nationwide.

8. Due to its litigation proficiency, expertise and the high caliber of its work-product, FMS has been repeatedly recognized and commended by federal courts throughout the country over many years. *Ramirez v. Trans Union, LLC*, 2022 WL 17722395 (N.D. Cal. Dec. 15, 2022) (“Courts have consistently recognized Francis Mailman Soumilas ‘for its expertise in FCRA litigation and the high caliber of its work for the classes it represents.’”); *Barel v. Bank of America*, 255 F.R.D. 393, 398-99 (E.D. Pa. 2009) (finding firm “competent, experienced and well-qualified to prosecute class actions” and noting that class counsel “have done an excellent job in representing the class in the instant litigation.”); *Martinez v. Avantus, LLC*, __ F.R.D. __, 2023 WL 112807, *9 (D. Conn. Jan. 5, 2023) (firm “has substantial experience in class action litigation, including FCRA class actions....[and] demonstrated proficiency at all stages of suit”); *Der Hacopian v. SentryLink*, C.A. 18-3001 (D. Md., Nov. 23, 2020) (firm “many, many times in the past has been found to be not just qualified or competent, but extremely well-qualified and competent to represent consumer classes in many, many other jurisdictions, not only this particular jurisdiction”); *Flores v. Express Services, Inc.*, C.A. No.14-3298, 2017 WL 1177098, at *3 (E.D. Pa. Mar. 30, 2017) (firm “has extensive experience in consumer class action litigation”); *White v. Equifax Info. Solutions*, No. 05-01070, 2014 WL 1716154, at *13, 19, 22 (C.D. Cal. May 1, 2014), *aff’d sub nom. Radcliffe v. Equifax Info. Sol’ns., Inc.*, 818 F.3d 537, 548 (9th Cir. 2016) (appointing firm and its team as interim class counsel over objections from a competing national law firm (Boies Schiller) because firm’s team’s “credentials and experience [we]re significantly stronger in class action and FCRA

1 litigation.”); *Patel v. Trans Union, LLC*, 308 F.R.D. 292, 307 (N.D. Cal. 2015) (FMS “have
2 represented consumer classes in many cases in many districts . . . [and] have shown their
3 proficiency in this case[.]”); *Kelly v. Business Information Group*, C.A. 15-6668, 2019 WL 414915
4 (E.D. Pa. 2019) (firm “qualified and experienced attorneys” --- Francis & Mailman, P.C., of
5 Philadelphia...who have substantial experience in class action and FCRA consumer litigation and
6 who are qualified to conduct the litigation.”); *Larson v. Trans Union, LLC*, C.A. 12-cv-05726,
7 2015 WL 3945052, at *12 (N.D. Cal. June 26, 2015) (appointing firm as class counsel on contested
8 motion).

9 9. FMS has litigated hundreds of FCRA cases, both individually and as class actions,
10 and has obtained some of the highest FCRA jury verdicts in Pennsylvania, Michigan, and
11 California.

12 10. FMS is in the very small minority of class action firms that has actual experience
13 in the trial of a consumer class action, as well as success in obtaining verdicts. The firm has brought
14 four class actions to trial, three of which resulted in successful verdicts for the consumer classes,
15 and the fourth which resulted in a settlement:

16 a. In the summer of 2017, FMS was trial counsel in the *Ramirez* case, a case
17 which obtained the largest FCRA verdict in history. The total verdict exceeded
18 \$60,000,000. *Ramirez v. Trans Union, LLC*, No. 3:12-cv-632 (N.D. Cal. June 21, 2017)
19 (ECF 309); order and opinion denying motion for new trial reported at 2017 WL 5153280
20 (N.D. Cal. Nov. 7, 2017). The case proceeded to the Ninth Circuit where it was affirmed
21 in part, and later to U.S. Supreme Court where it was remanded and then settled for \$9
22 million dollars.

23 b. In *Samuel-Bassett v. Kia Motors America, Inc.*, 34 A.3d 1 (Pa. 2011), my
24 firm obtained a \$5.6 million dollar verdict for class of Pennsylvania car purchasers, plus
25 award of attorney’s fees, upheld by Pennsylvania Supreme Court.

1 c. In *Little v. Kia Motors America, Inc.*, 2003 WL 25568765 (N.J. Super. L.
2 2003), we obtained an approximate \$6 million dollar verdict for a class of New Jersey car
3 purchasers, later reversed on appeal.

4 d. In *Chakejian v. Equifax Information Services, LLC*, 275 F.R.D. 201 (E.D.
5 Pa. 2011), FMS obtained a favorable class settlement following opening statements to the
6 jury.

7 11. As outlined in the attached firm biography, **Exhibit C**, FMS has been class counsel
8 in some of the largest FCRA class action settlements to date:

9 a. *Ryals et al. v. Hireright Solutions, Inc.*, No. 3:09-cv-625 (E.D. Va. Dec. 22,
10 2011) (\$28.3 million);

11 b. *Henderson v. Acxiom Risk Mitigation, Inc.*, No. 12-cv-589 (E.D. Va. Aug.
12 7, 2015) (\$20.8 million);

13 c. *Thomas v. BackgroundChecks.com*, No. 13-cv-029 (E.D. Va. Aug. 11,
14 2015) (\$18 million); and

15 d. *Berry v. LexisNexis Risk & Info. Analytics Group, Inc.*, No. 3:11-cv-754,
16 2014 WL 4403524, at *11 (E.D. Va. Sept. 5, 2014) (hybrid 23(b)(3), (b)(2) settlement
17 involving \$13.5 million plus national injunctive relief).

18 12. In addition to the instant matter, my firm and I have been certified to serve as class
19 counsel in a number of matters involving consumer reporting agencies' use of OFAC information.
20 These include:

21 a. *Ramirez v. Trans Union, LLC*, 301 F.R.D. 408 (N.D. Cal. 2014) (certifying,
22 on contest, a national e(b) class regarding defendant's use of OFAC information);

23 b. *Larson, et al. v. Trans Union, LLC*, No. 3:18-cv-03280-WHO, ECF 170
24 (N.D. Cal. Nov. 29, 2018) (finally approving class action settlement);

25 c. *Patel v. Trans Union, LLC*, 308 F.R.D. 292, 295 (N.D. Cal. 2015)
26 (certifying, on contest, a national e(b) class challenging the defendants' willful failure to
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maintain and follow reasonable procedures to ensure the maximum possible accuracy of OFAC information, settled for \$8 million); and

d. *Martinez v. Avantus, LLC*, ___ F.R.D. ___, 2023 WL 112807, *9 (D. Conn. Jan. 5, 2023) (certifying OFAC class).

FMS's Involvement in the Instant Litigation

13. Almost five years ago, on October 2, 2018, Plaintiff filed this lawsuit on behalf of himself and other similarly situated persons, alleging that Defendant's association of consumers like himself with individuals on the OFAC list violated the requirements of section 1681e(b) of the FCRA and CAL. CIV. CODE § 1785.14(b) of its state-law analog, the California Credit Reporting Agencies Act ("CCRAA"), which require covered entities to use reasonable procedures to assure the maximum possible accuracy of a consumer report. *See* ECF 1.

14. In addition to the above FCRA and CCRAA claims that the Court certified as class claims, Plaintiff's complaint also included claims alleging Defendant's failure to reinvestigate Plaintiff's dispute of the OFAC information it associated with him under FCRA section 1681i, and its failure to disclose all information in his file to him under FCRA section 1681g and CCRAA sections 1785.10 and 1785.15. After sufficient discovery, Plaintiff did not seek class treatment for these claims.

15. I was admitted in this matter *pro hac vice* on October 17, 2018, ECF 6, and worked as co-lead counsel with attorneys Michael A. Caddell, Cynthia B. Chapman, and Amy E. Tabor of the firm of Caddell & Chapman.

16. FMS played a significant role in the substantial, prolonged discovery battles that ultimately brought this case to a successful resolution by settlement because of its decades of experience litigating complex FCRA class actions.

17. A substantial amount of FMS's time in this case was expended addressing Defendant's repeated refusal to abide by its discovery obligations, and successfully challenging such conduct. This included:

1 a. Seeking an order compelling the production of Defendant’s contract with
2 Norm Reeves Honda and related invoices, *see* ECFs 26, 27;

3 b. Seeking an order compelling further responses from Defendant to Plaintiff’s
4 Interrogatory Nos. 5-10 and Requests for Production Nos. 3 and 7-9 regarding Class
5 Member’s consumer reports and related ESI and depositions of Defendant’s employees
6 Frank Larsen, David Daniel, and Leanne Cobb, *see* ECF 37;

7 c. Seeking an order overruling defendant’s objections to Order at ECF 37
8 compelling the production of documents and further response to interrogatories,. ECF 44;

9 d. Seeking an order compelling production of ESI responsive to Request for
10 Production No. 7 and contemplating Defendant’s Motion for Protective Order concerning
11 whether the information is “not reasonable accessibility because of undue burden or cost,”
12 ECF 51;

13 e. Opposing Defendant’s Motion for Protective Order, *see* ECF 63 (denying
14 same);

15 f. Seeking an order compelling production of “[a]ll versions of the code for
16 [Defendant’s] OFAC Information lookup and scoring algorithm” and “[d]ocuments
17 sufficient to show a list of tables and fields, including any and all descriptions, for the
18 MariaDB database maintained by Frank Larsen[.]” ECF 70 (compelling same);

19 g. Seeking an Order overruling Defendant’s objections to Order at ECF 63
20 denying its Motion for Protective Order, *see* ECF 71; and

21 h. Opposing Defendant’s Motion for Limited Discovery from Class Members,
22 ECF 132 (denying same).

23 18. This matter also involved multiple depositions, including of third parties
24 subpoenaed by Defendant after class certification. In addition to the three depositions of
25 Defendant’s employees taken by co-counsel Caddell & Chapman, FMS took the deposition of
26 Defendant’s then-CEO Darin Larsen and its then-CTO Frank Larsen on October 29, 2020; the
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deposition of third party Van Housen's Motors on December 2, 2022; and the deposition of third party McGovern Auto Group on December 2, 2022.

19. FMS also prepared Plaintiff Sung G. Kang for his deposition and defended it on August 22, 2019.

20. FMS also contributed to the successful resolution of the numerous non-discovery motions filed in this matter, including successfully defeating Defendant's Motion to Dismiss and its Motion for Summary Judgment.

21. FMS took the lead in preparing the class certification motions in this matter, including those seeking approval of the parties' settlement.

22. FMS has been and will continue to be the primary point of contact for the Settlement Administrator as well.

23. FMS attended all 3 mediation sessions in this matter. The first took place on September 21st, 2021 with the Hon. William Cahill (ret.), the second took place on February 9th, 2023 with mediator Rodney Max, and the third took place on February 14th, 2023. These sessions and calls required substantial preparation, including drafting memoranda, reviewing documents produced by defendant, and conferring with Class Counsel. A series of post-mediation calls among Mr. Max, Class Counsel, and counsel for defendant ultimately lead to the settlement preliminarily approved by this Court.

24. The work performed by FMS attorneys and paralegals in this matter is summarized by category in the following table:

Category	Hours
A. - File Admin	18.7
B. - Pre-suit Investigation	32.7
C. - Pleadings and service	54.6
D. - Disclosures and Rule 16 Conf.	43.2
E. - Written Discovery	139.8
F. - Settlement Talks and Conferences	186.1

G. - Depositions	94.0
H. - Motion Practice	780.2
I. - Class Action Notices and Admin.	131.5
Grand Total	1,480.8

The Firm's Hourly Rates

25. The hourly rates charged by my firm as reflected herein are the same as the regular current rates charged to clients who retain the firm in connection with non-class matters.

26. The rates charged by the attorneys and paralegals of my firm are reasonable and within the range of the appropriate market rates charged by attorneys with comparable experience levels for litigation of a similar nature, given their experience level, practice concentration and background. *See* October 18, 2022 expert report of Abraham C. Reich, Esquire, Partner/Chair Emeritus for the law firm of Fox Rothschild, LLP, attached hereto as **Exhibit D**. These rates were set based upon the opinions of independent outside counsel at the law firm of Fox Rothschild, LLP. *Id.* My firm's standard hourly rates have been set following consultation with Mr. Reich for several years, independently from this or any other class action case. Courts across the country have relied upon Mr. Reich's expert opinion to approve my firm's hourly rates.¹

¹ *See, e.g., Ramirez v. Trans Union, LLC*, 2022 WL 17722395 (N.D. Cal. Dec. 15, 2022) ("These hourly rates are generally in line with rates prevailing in this community for similar services by lawyers of reasonably comparable skill, experience and reputation" citing "an October 18, 2022 expert report from Abraham C. Reich of Fox Rothschild, LLP recommending the hourly rates to be charged by Francis Mailman Soumilas in each of the legal markets in which the firm has an office, including San Francisco."); *Botts v. The Johns Hopkins University*, No. 1:20-cv-01335-JRR, ECF 96 (D. Md. Apr. 20, 2023) (approving request for attorney's fees supported by Reich report); *McIntyre v. RealPage, Inc.*, No. 2:18-cv-03934-CFK, ECF 156, (E.D. Pa. Mar. 24, 2023) (approving hourly rates supported by Reich report); *Berry v. Schulman*, 807 F.3d 600, 617 (4th Cir. 2015) (affirming fee award approving hourly rates); *Thomas v. Equifax Info. Services, LLC*, No. 3:18-cv-00684-MHL, ECF 55 (E.D. Va. Sep. 13, 2019) (approving hourly rates based upon Reich report); *Kelly v. Business Info. Group, Inc.*, 2019 WL 414915, * 20 (E.D. Pa. Feb. 1, 2019) (approving hourly rates and relying on Mr. Reich's expert opinion); *Clark v. Experian Info. Solutions, Inc.*, No. 3:16-cv-00032-MHL, ECF 150 (E.D. Va. Feb. 1, 2019) (approving hourly rates based upon Reich report); *Clark v. Trans Union, LLC*, No. 3:15-cv-00391-MHL, ECF 273 (E.D. Va. Aug. 29, 2018) (same); *Henderson v. CoreLogic Nat'l Background Data, LLC*, No. 3:12-cv-97, 2018 WL 1558556, at *5 (E.D. Va. Mar. 22, 2018) (approving same hourly rates requested here based upon same expert report); *Patel v. Trans Union, LLC*, No. 14-cv-00522-LB, 2018 WL 1258194, at *7 (N.D. Cal. Mar. 11, 2018) (approving requested hourly rates enhanced to reflect San Francisco legal market); *Stokes v. RealPage, Inc.*, C.A. No. 15-1520 (E.D. Pa. Feb. 6, 2018) (ECF 65) (approving requested hourly rates); *Flores v. Express Services Inc.*, 2017 WL 1177098, at *4 (E.D. Pa. Mar. 29, 2017) (approving hourly rates and granting multiplier of 4.6); *Carter v. Shalhoub Management Company Inc.*, No. 15-cv-1531 (C.D. Cal. Mar. 15, 2017) (ECF 69) (granting firm's fee petition in full); *Blandina v. Midland Funding, LLC*, 2016 WL 3101270, *7-8 (E.D. Pa. 2016) (approving hourly rates and granting fee request in full); *Giddiens v. Infinity Staffing Solutions, Inc.*, No. 2:13-

27. The hourly rates charged by the attorneys and paralegals who worked on this matter are as follows: for James A. Francis, \$905.00; for John Soumilas, \$805.00; for Jordan M. Sartell, \$465.00; for Lauren KW Brennan, \$465.00; and for the firm's paralegals, \$305.00.

28. In order to prosecute this case efficiently, I staffed this case with appropriate, experienced counsel and support staff and supervised their work. Consistent with the firm's usual practice, tasks and assignments were apportioned to avoid the expenditure of duplicative time and redundant staffing.

29. One example of these efforts is represented by the time invested by Jordan M. Sartell, one of the firm's junior attorneys. Mr. Sartell was responsible for the majority of Class Counsel's efforts to compel production of discovery and to oppose Defendant's efforts to obtain protective orders. He also took the lead with drafting the motions for class certification, the motion for preliminary approval, and the instant fee petition. He also took two first-party and two third-party depositions and defended the Plaintiff's deposition. In total, the 714 hours billed by Mr. Sartell since this case's inception represents 48% of the firm's total hours billed and constitutes 40% of the lodestar sought here.

30. My firm's lodestar figure is based upon the hourly rates described above and do not include charges for costs or expense items. Litigation costs and expenses are billed separately, and such charges are not duplicated in my firm's billing records or rates.

The Firm's Lodestar

31. My firm's lodestar for its attorneys and paralegals in the instant matter from its inception to the present, including time that I anticipate FMS will expend seeking final approval of the settlement in this matter and assisting Class members, is set forth below:

cv-7115, ECF 36 (E.D. Pa. Jan. 12, 2016) (same); *Sholinsky v. Frost-Arnett Company*, No. 1:14-cv-7889, ECF 33 (D. N.J. Jan. 19, 2016) (same); *Giddiens v. LexisNexis Risk Solutions, Inc.*, No. 2:12-cv-2624, ECF 56 (E.D. Pa. Jan. 20, 2015) (granting same); *Sapp v. Equifax Information Solutions, Inc.*, 2013 WL 2130956, at *2-3 (E.D. Pa. 2013) (approving fee petition in full); *Baker v. International Bank, C.A. No. 08-5668*, ECF 110 (D. N.J. Feb. 28, 2013) (approving firm's fee petition in full); *Chakejian v. Equifax Information Services, LLC*, 275 F.R.D. 201, 216, n.19-20 (E.D. Pa. 2011) (adopting expert opinion testimony of Abraham Reich, Esq.).

Timekeeper and Title	Years of Experience	Hourly Rate	Hours Billed	Lodestar
James A. Francis, Partner	28	\$905.00	248	\$224,440.00
John Soumilas, Partner	24	\$805.00	231.6	\$186,438.00
Jordan M. Sartell, Associate	11	\$465.00	714.0	\$332,010.00
Lauren KW Brennan, Associate	11	\$465.00	26.9	\$12,508.50
Jeffrey Kabacinski, Sr. Paralegal	25	\$305.00	260.3	\$79,391.50
Totals:			1,478.1	\$834,788.00

32. Attached hereto as **Exhibit A** is a detailed report of the time FMS invested in this matter, which includes the individual time entries of the FMS attorneys and paralegals that worked on this matter. These entries were drawn from the firm's electronic timekeeping platform. Time expended in preparing this application for fees and reimbursement of expenses has been included in this request and as well as anticipated time going forward through final approval and class administration. Duplicative or redundant time entries have been eliminated.

Litigation Costs

33. FMS reasonably incurred and is seeking a total of \$48,586.73 in unreimbursed costs and expenses in connection with the prosecution of the instant litigation.

34. The lodestar figures above do not include charges for expenses, and costs of the litigation. The costs of the litigation are billed separately and such charges are not duplicated in my firm's billing rates. Each of the expenses would typically be billed to paying clients, and certain expenses have been excluded from the amount sought.²

² Expenses for travel related to the final approval hearing before this Court on October 25, 2023, which have not yet been finalized in any event, have been excluded. Expenses for airfare and lodging for which the firm seeks reimbursement relate to work performed preparing Plaintiff Kang for his deposition and defending same.

35. The firm's unreimbursed expenses are summarized by category below:

Category	Expenses
Class Notice/Admin	\$3,637.50
Conferences	\$201.37
Deposition/Video	\$1,485.25
Expert Witness Fee	\$19,586.25
Fed Ex	\$390.79
Filing Fees	\$13.91
Mediation	\$20,500.00
Outside Copying Fees	\$64.80
Parking	\$16.80
Pro Hac Vice	\$225.00
Airfare	\$1,171.96
Cabs	\$518.35
Lodging	\$423.87
Train	\$436.25
Total	\$48,586.73

36. Attached hereto as **Exhibit B** is detailed table of the above-summarized expenses, which was drawn from my firm's bookkeeping software and were prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses and costs in the case.

37. The largest categories of unreimbursed costs that FMS seeks correspond to payments for mediation (September 15, 2021 payment to JAMS and March 16, 2023 payment to Upchurch Watson White & Max), for expert testimony and analysis from OFAC expert Duncan Levin (September 3, 2021 payment to Tucker Levin PLLC), and for initial notice to Class members (September 27, 2022 to Continental DataLogix). *See Ex. B.*

38. Attached hereto as **Exhibit E** is a true and correct copy of a document provided by Plaintiff Sung G. Kang to Class Counsel.

1 39. I declare under penalty of perjury that the foregoing is true and correct.
2 Executed on August 1, 2023. /s/James A. Francis
3 James A. Francis
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EXHIBIT A

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Lauren Brennan	11/21/17	B. - Pre-suit Investigation	Confer with JS re: presuit investigation and disclosure request	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	11/27/17	B. - Pre-suit Investigation	review partial credit report for client, investigate claims	0.5	\$ 465.00	\$ 232.50
Lauren Brennan	12/19/17	B. - Pre-suit Investigation	Reviewed client docs and confer with JS re: same.	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	01/02/18	B. - Pre-suit Investigation	Confer with JS and JMS re: case status and litigation strategy	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/02/18	B. - Pre-suit Investigation	confer in firm w/LKWB, JS re case claims, strategies, and defenses	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/05/18	C. - Pleadings and service	drafting complaint	2.7	\$ 465.00	\$ 1,255.50
Jordan Sartell	01/05/18	C. - Pleadings and service	confer in firm w/JAF, DS, LKWB, JS re pleadings, case strategy, venue considerations	0.2	\$ 465.00	\$ 93.00
John Soumilas	01/08/18	B. - Pre-suit Investigation	Further correspondence with client; further pre-suit investigation.	0.8	\$ 805.00	\$ 644.00
John Soumilas	01/25/18	B. - Pre-suit Investigation	Further pre-suit investigation and complaint drafting; correspondence to client; prepare class engagement letter.	1.5	\$ 805.00	\$ 1,207.50
Jordan Sartell	01/25/18	C. - Pleadings and service	confer w/JS re status of pleadings, his review of same	0.3	\$ 465.00	\$ 139.50
John Soumilas	01/29/18	B. - Pre-suit Investigation	Further investigation; call and correspondence with client; correspondence re local counsel and venue for filing.	2.1	\$ 805.00	\$ 1,690.50
Jordan Sartell	02/01/18	B. - Pre-suit Investigation	confer with client, JS re finalizing complaint, filing same, next steps in case	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	02/01/18	B. - Pre-suit Investigation	confer in firm w/JS re case strategy, theories of liability	0.3	\$ 465.00	\$ 139.50
John Soumilas	02/02/18	B. - Pre-suit Investigation	call with client; review select docs re possible arbitration issue.	0.8	\$ 805.00	\$ 644.00
Jordan Sartell	02/02/18	B. - Pre-suit Investigation	confer in firm w/JS re client disputing OFAC hit information to CRA (.3); confer with client re same (.2)	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	02/02/18	B. - Pre-suit Investigation	review fine print of terms of use for product that client signed up for vis a vis experian	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	02/06/18	B. - Pre-suit Investigation	confer in firm w/JS (.2); confer w/client re Def's website (.2)	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	02/13/18	B. - Pre-suit Investigation	additional review of Ts&Cs from Experian website products to which client may have subscribed; confer in firm w/JS re same	0.3	\$ 465.00	\$ 139.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	02/21/18	B. - Pre-suit Investigation	confer in firm w/JS re status of case merits review (.2); confer w/client re disputation of OFAC association (.2)	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	02/27/18	B. - Pre-suit Investigation	confer w/client re dispute correspondence to Experian	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/20/18	C. - Pleadings and service	confer in firm w/JS re claim (.2) update complaint to include new facts regarding client's unsuccessful dispute of OFAC information	3.1	\$ 465.00	\$ 1,441.50
Jordan Sartell	03/20/18	B. - Pre-suit Investigation	review correspondence from Exp forwarded by CI	0.7	\$ 465.00	\$ 325.50
Lauren Brennan	03/20/18	B. - Pre-suit Investigation	Reviewed dispute and results documentation; confer with JS re: same.	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	03/21/18	C. - Pleadings and service	confer in firm w/JS re pleadings (.3)	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	03/22/18	C. - Pleadings and service	continue to draft complaint; confer w/client re factual allegations in same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/23/18	C. - Pleadings and service	review, revise complaint	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	03/26/18	C. - Pleadings and service	continue review and revision of complaint	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	03/27/18	C. - Pleadings and service	continue to draft complaint	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	04/13/18	C. - Pleadings and service	confer in firm w/JS re complaint, claims raised and factual underpinnings of same; filing time frame	0.3	\$ 465.00	\$ 139.50
Lauren Brennan	04/16/18	C. - Pleadings and service	Revised complaint.	1.9	\$ 465.00	\$ 883.50
Lauren Brennan	04/18/18	C. - Pleadings and service	Revised complaint.	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	04/19/18	C. - Pleadings and service	confer w/client re details alleged in latest draft of complaint (.4); confer in firm w/LKWB re same (.2)	0.6	\$ 465.00	\$ 279.00
Lauren Brennan	04/19/18	C. - Pleadings and service	Revised complaint; conferred with client re: same.	0.6	\$ 465.00	\$ 279.00
Lauren Brennan	04/20/18	C. - Pleadings and service	Revised complaint; drafted memo to file re: client call.	1.4	\$ 465.00	\$ 651.00
Jordan Sartell	04/23/18	B. - Pre-suit Investigation	review notes from client conversation, review complaint allegations in light of same	0.3	\$ 465.00	\$ 139.50
Lauren Brennan	04/23/18	B. - Pre-suit Investigation	Confer with co-counsel re: claim and venue considerations.	0.3	\$ 465.00	\$ 139.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Lauren Brennan	04/24/18	B. - Pre-suit Investigation	Confer with co-counsel re: venue considerations.	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	04/26/18	C. - Pleadings and service	review and revise complaint for filing	1.6	\$ 465.00	\$ 744.00
Lauren Brennan	04/26/18	B. - Pre-suit Investigation	Correspondence with client re: documents.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/27/18	C. - Pleadings and service	continue review and revise complaint for filing	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	05/07/18	B. - Pre-suit Investigation	Confer with co-counsel re: venue considerations.	0.2	\$ 465.00	\$ 93.00
James Francis	05/08/18	B. - Pre-suit Investigation	t/c with C&C re venue; read venue memo from CC;	0.8	\$ 905.00	\$ 724.00
Lauren Brennan	05/08/18	C. - Pleadings and service	Participated in conference call with co-counsel re: venue considerations and class definition strategy.	0.3	\$ 465.00	\$ 139.50
Lauren Brennan	05/09/18	C. - Pleadings and service	Reviewed revisions to complaint.	0.3	\$ 465.00	\$ 139.50
James Francis	05/10/18	C. - Pleadings and service	Rev/Edit/Revise Complaint, rev client docs, case workup, legal research for claims	3.5	\$ 905.00	\$ 3,167.50
Lauren Brennan	05/10/18	C. - Pleadings and service	Revised complaint; conferred with JS and JAF re: same.	1.2	\$ 465.00	\$ 558.00
Lauren Brennan	05/11/18	C. - Pleadings and service	Confer with co-counsel re: finalized filing.	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	05/14/18	C. - Pleadings and service	Confer with co-counsel re: judge assignment; researched same.	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	05/14/18	D.- Disclosures and Rule 16 Conf.	confer w/client, review additional documents from same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/15/18	D.- Disclosures and Rule 16 Conf.	review additional documents from same	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	05/16/18	C. - Pleadings and service	confer w/JS re filing of case, upcoming deadlines	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	05/21/18	C. - Pleadings and service	Correspondence with co-counsel re: default MCC deadline and strategy for same.	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	05/22/18	C. - Pleadings and service	Correspondence with defense counsel re: complaint; reviewed documents; conducted research re: other possible defendants.	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	05/23/18	C. - Pleadings and service	Correspondence with co-counsel re: complaint and defense response.	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	05/31/18	C. - Pleadings and service	confer in firm w/JS, LKWB re recent developments in case theory upon response from Exp counsel Dan McLoon	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	05/31/18	C. - Pleadings and service	Confer with co-counsel re: proper defendants and strategy for withdrawal and refiling.	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	06/01/18	C. - Pleadings and service	review correspondence among counsel, from OC Dan McLoon, re additional potential defendants, strategy going forward	0.3	\$ 465.00	\$ 139.50
Lauren Brennan	06/01/18	C. - Pleadings and service	Confer with co-counsel re: strategy for withdrawal and refiling.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/08/18	B. - Pre-suit Investigation	confer w/RB re investigation into other implicated parties (potential defendants) who provided OFAC information according to Dan McLoon	0.2	\$ 465.00	\$ 93.00
Paralegal	06/08/18	B. - Pre-suit Investigation	Confer w/ J. Sartell and review email re researching potential defendants.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	06/11/18	B. - Pre-suit Investigation	review materials located by RB regarding potential defendants ID'd by Exp counsel in informal conversations	1.1	\$ 465.00	\$ 511.50
Paralegal	06/11/18	B. - Pre-suit Investigation	Research AMPS, Automate and 700 Credit as potential entities involved in OFAC claim.	1.0	\$ 305.00	\$ 305.00
Paralegal	06/11/18	B. - Pre-suit Investigation	Review emails between D. McLoon and M. Caddell re entities involved in OFAC claim.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	06/11/18	B. - Pre-suit Investigation	confer w/client re status of case and potential additional defendants	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/12/18	B. - Pre-suit Investigation	confer w/client re request to 700Credit for consumer disclosure	0.3	\$ 465.00	\$ 139.50
Paralegal	06/13/18	A. - File Admin	Followup emails with co-counsel re J. Francis and J. Soumilas Pro Hac Vice applications; discuss venue	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	06/13/18	C. - Pleadings and service	Confer with JAF and co-counsel re: litigation strategy.	0.2	\$ 465.00	\$ 93.00
James Francis	06/15/18	B. - Pre-suit Investigation	Teleconference with co-counsel re: EX issue	0.8	\$ 905.00	\$ 724.00
Lauren Brennan	06/15/18	C. - Pleadings and service	Participated in call with co-counsel re: litigation strategy.	0.7	\$ 465.00	\$ 325.50
James Francis	06/15/18	B. - Pre-suit Investigation	Review notes/emails from CC re: EX issue; internet research	0.7	\$ 905.00	\$ 633.50
Jordan Sartell	06/15/18	B. - Pre-suit Investigation	confer in firm w/JS re progress on identifying additional defendants and strategy going forward re same; discuss assignments and client fact gathering	0.3	\$ 465.00	\$ 139.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	06/18/18	B. - Pre-suit Investigation	confer w/client regarding disclosure request correspondence to other potential defendant entities (.5+); confer in firm w/JS re same (.2)	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	06/19/18	B. - Pre-suit Investigation	continue conferral w/client regarding disclosure request correspondence to other potential defendant entities	0.2	\$ 465.00	\$ 93.00
James Francis	06/20/18	B. - Pre-suit Investigation	Review/revise emails re: MAC, DJM & proper defendant	0.6	\$ 905.00	\$ 543.00
Jordan Sartell	06/20/18	B. - Pre-suit Investigation	confer w/client re investigation efforts and requests to revisit source of the erroneous disclosure; confer in firm re same	0.4	\$ 465.00	\$ 186.00
John Soumilas	06/21/18	B. - Pre-suit Investigation	Further research re correct APMS entity; call with co-counsel; call with client.	0.6	\$ 805.00	\$ 483.00
Jordan Sartell	06/22/18	B. - Pre-suit Investigation	review client correspondence to AMPS and AutoMate requesting information; confer in firm w/JS re same	0.6	\$ 465.00	\$ 279.00
Paralegal	06/22/18	B. - Pre-suit Investigation	Review email from J. Sartell re client's draft letter to Automotive Marketing Profit Systems.	0.2	\$ 305.00	\$ 61.00
Paralegal	06/22/18	B. - Pre-suit Investigation	Meet and confer w/ J. Soumilas and J. Sartell re next steps.	0.2	\$ 305.00	\$ 61.00
John Soumilas	07/06/18	B. - Pre-suit Investigation	Review status of locating correct defendant(s); call with client.	0.6	\$ 805.00	\$ 483.00
John Soumilas	07/09/18	E. - Written Discovery	Review further docs from client; internal correspondence among co-counsel.	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	07/09/18	B. - Pre-suit Investigation	review correspondence received by client from Auto/Mate; confer w/client, co-counsel re same	0.3	\$ 465.00	\$ 139.50
Lauren Brennan	07/09/18	B. - Pre-suit Investigation	Correspondence re: identification of proper defendant; reviewed client documents.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/13/18	B. - Pre-suit Investigation	investigate new defendant lead; confer w/co-counsel; confer w/client re requesting disclosure from same	0.8	\$ 465.00	\$ 372.00
John Soumilas	07/13/18	B. - Pre-suit Investigation	Further research re possible OFAC reporting entity; correspondence from client.	0.4	\$ 805.00	\$ 322.00
Lauren Brennan	07/13/18	B. - Pre-suit Investigation	Correspondence with co-counsel re: proper defendant.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/18/18	B. - Pre-suit Investigation	confer w/co-counsel re status of client's dispute and request for file	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/19/18	B. - Pre-suit Investigation	confer w/client re telephonic response from CBC; memo to file re same	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	07/24/18	B. - Pre-suit Investigation	confer among co-counsel, in firm re updates received from client	0.5	\$ 465.00	\$ 232.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Lauren Brennan	07/24/18	B. - Pre-suit Investigation	Confer with co-counsel re: g claim.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/30/18	B. - Pre-suit Investigation	review doc client rec'd from CBC (.1); confer w/JS re same and case chronology (.2) forward to co-counsel (.2); prepare correspondence chronology (.4); participate in strategy conference call re same (.4)	1.3	\$ 465.00	\$ 604.50
John Soumilas	07/30/18	B. - Pre-suit Investigation	Further correspondence and docs from client; call with P's attorney team re strategy; notes.	1.1	\$ 805.00	\$ 885.50
James Francis	07/30/18	B. - Pre-suit Investigation	review JS email re AMMPS response and file disclosures generally; t/c with C&C re next steps	0.7	\$ 905.00	\$ 633.50
Lauren Brennan	07/30/18	B. - Pre-suit Investigation	Correspondence re: possible defendants; reviewed documents re: same.	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	08/01/18	B. - Pre-suit Investigation	confer w/client re CBC response, strategy going forward	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	08/02/18	B. - Pre-suit Investigation	review correspondence from co-counsel AT re status of OFAC search results from defendant's website	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/13/18	H. - Motion Practice	confer w/co-counsel re upcoming 90-day MCC deadline per local rules (runs 8/16)	0.5	\$ 465.00	\$ 232.50
Lauren Brennan	08/13/18	B. - Pre-suit Investigation	Confer with co counsel re proper defendant and litigation strategy.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/16/18	B. - Pre-suit Investigation	confer w/client re status of investigation of proper defendant, venue considerations	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/10/18	C. - Pleadings and service	draft complaint; review, revise w/JS	2.3	\$ 465.00	\$ 1,069.50
Jordan Sartell	09/11/18	C. - Pleadings and service	confer w/client re facts of transaction at car dealer vis a vis revising complaint	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/12/18	C. - Pleadings and service	continue drafting complaint	1.0	\$ 465.00	\$ 465.00
Jordan Sartell	09/13/18	C. - Pleadings and service	continue to draft complaint	1.8	\$ 465.00	\$ 837.00
Paralegal	09/14/18	B. - Pre-suit Investigation	Investigate postings to CBC's blog regarding OFAC and penalties re: same issue.	2.9	\$ 305.00	\$ 884.50
Jordan Sartell	09/14/18	C. - Pleadings and service	continue drafting complaint	2.6	\$ 465.00	\$ 1,209.00
Jordan Sartell	09/18/18	C. - Pleadings and service	continue to revise complaint	2.6	\$ 465.00	\$ 1,209.00
John Soumilas	09/19/18	C. - Pleadings and service	review latest draft of complaint	0.7	\$ 805.00	\$ 563.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	09/19/18	C. - Pleadings and service	review, revise first draft of complaint	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	09/19/18	E. - Written Discovery	Correspondence with co-counsel re: sample discovery.	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	09/20/18	C. - Pleadings and service	review, revise first draft of complaint	0.7	\$ 465.00	\$ 325.50
Lauren Brennan	09/21/18	C. - Pleadings and service	Revised complaint; confer with JMS re: same.	1.9	\$ 465.00	\$ 883.50
Jordan Sartell	09/21/18	C. - Pleadings and service	confer in firm w/LKWB re draft complaint	0.4	\$ 465.00	\$ 186.00
James Francis	09/27/18	C. - Pleadings and service	review and edit Complaint, review file	3.4	\$ 905.00	\$ 3,077.00
Jordan Sartell	09/27/18	C. - Pleadings and service	finalize revisions to complaint; confer in firm w/JS re same	0.5	\$ 465.00	\$ 232.50
John Soumilas	09/28/18	C. - Pleadings and service	review and revise complaint; correspondence with co-counsel.	2.3	\$ 805.00	\$ 1,851.50
Jordan Sartell	09/28/18	C. - Pleadings and service	final review of complaint w/JS; conferral w/co-counsel re same	0.6	\$ 465.00	\$ 279.00
James Francis	10/02/23	C. - Pleadings and service	final review of class action complaint and file prior to filing	2.7	\$ 905.00	\$ 2,443.50
John Soumilas	10/02/18	C. - Pleadings and service	Review final edits my M.Caddell; correspondence to co-counsel re filing.	0.3	\$ 805.00	\$ 241.50
Lauren Brennan	10/02/18	C. - Pleadings and service	Confer with co-counsel re: filing of complaint.	0.2	\$ 465.00	\$ 93.00
John Soumilas	10/03/18	C. - Pleadings and service	Review info re judge, pro hacs	0.3	\$ 805.00	\$ 241.50
Paralegal	10/04/18	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar.	0.6	\$ 305.00	\$ 183.00
Jordan Sartell	10/04/18	C. - Pleadings and service	review ECF entries, confer w/co-counsel re case numbers; create docket alert on Westlaw	0.3	\$ 465.00	\$ 139.50
Paralegal	10/05/18	H. - Motion Practice	Gather Certificates of Good Standing for purposes of pro hac vice motion.	0.6	\$ 305.00	\$ 183.00
Paralegal	10/08/18	H. - Motion Practice	Prepare pro hac vice motions for JAF & JS; send to staff of local counsel for filing.	1.3	\$ 305.00	\$ 396.50
Jordan Sartell	10/09/18	C. - Pleadings and service	review ECF 4,5, update case management spreadsheet	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	10/16/18	C. - Pleadings and service	Calendar due date of defendant's answer or dispositive motion.	0.5	\$ 305.00	\$ 152.50
John Soumilas	10/16/18	C. - Pleadings and service	correspondence re service; meet with paralegal re same	0.2	\$ 805.00	\$ 161.00
Lauren Brennan	10/16/18	C. - Pleadings and service	Correspondence with co-counsel re: service.	0.2	\$ 465.00	\$ 93.00
Paralegal	10/17/18	A. - File Admin	Download and place pro hac vice orders on cloud storage; registration of JAF and JS for ECF logins.	0.5	\$ 305.00	\$ 152.50
John Soumilas	10/17/18	C. - Pleadings and service	Review pro hac order; local rules	0.3	\$ 805.00	\$ 241.50
Jordan Sartell	10/18/18	C. - Pleadings and service	note ECF 6, 7, re PHV admission granted for JS, JAF; update case management spreadsheet	0.2	\$ 465.00	\$ 93.00
Paralegal	10/26/18	A. - File Admin	Download stipulation re: time for Defendant to answer or file responsive motion; adjust deadline on litigation calendar.	0.4	\$ 305.00	\$ 122.00
Lauren Brennan	10/26/18	C. - Pleadings and service	Confer with co-counsel re: extension of time to answer.	0.2	\$ 465.00	\$ 93.00
Paralegal	10/29/18	C. - Pleadings and service	Download Court's order extending time for Defendant to file Answer or other responsive pleading; adjust case deadline on litigation calendar accordingly.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	11/09/18	H. - Motion Practice	review defendant's motion to dismiss, accompanying memorandum and declarations; confer w/JS re same	1.3	\$ 465.00	\$ 604.50
Paralegal	11/09/18	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar.	0.6	\$ 305.00	\$ 183.00
John Soumilas	11/10/18	H. - Motion Practice	Preliminary review of D motion to dismiss; select legal research; notes to file.	3.6	\$ 805.00	\$ 2,898.00
Lauren Brennan	11/12/18	H. - Motion Practice	Reviewed motion to dismiss, confer with co-counsel re: same.	0.4	\$ 465.00	\$ 186.00
John Soumilas	11/13/18	H. - Motion Practice	Review D's motion to dismiss; call with co-counsel re strategy in taking discovery and responding; memo to file	1.8	\$ 805.00	\$ 1,449.00
Jordan Sartell	11/13/18	H. - Motion Practice	confer in firm w/JS, w/CC MC, AT re def's motion to dismiss, opposition to same; memo re same to file	0.4	\$ 465.00	\$ 186.00
James Francis	11/13/18	H. - Motion Practice	t/conf. re: MTD; response short; meet with JS	0.4	\$ 905.00	\$ 362.00
Paralegal	11/13/18	H. - Motion Practice	Distribute conference call information for call on strategy re: motion to dismiss.	0.2	\$ 305.00	\$ 61.00
John Soumilas	11/14/18	H. - Motion Practice	correspondence re client; update; MTD	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	11/14/18	H. - Motion Practice	confer w/client re pending M2D, strategy re same	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	11/16/18	H. - Motion Practice	f/u w/client re status of case, strategy re motion to dismiss	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	11/19/18	H. - Motion Practice	Confer with co-counsel re: opp to MTD.	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	11/20/18	H. - Motion Practice	Correspondence with co-counsel; research re reseller liability.	0.8	\$ 805.00	\$ 644.00
Jordan Sartell	11/20/18	H. - Motion Practice	research on reseller as CRA materials from CD Cal, 9th Cir	0.6	\$ 465.00	\$ 279.00
John Soumilas	11/21/18	H. - Motion Practice	correspondence with client; correspondence with co-counsel re motion to dismiss response	0.7	\$ 805.00	\$ 563.50
Jordan Sartell	11/21/18	H. - Motion Practice	confer w/co-counsel AT, client, re status of motion for judgment on the pleadings opposition	0.4	\$ 465.00	\$ 186.00
James Francis	11/25/18	H. - Motion Practice	draft/review/ edit OPP to 12b6	6.5	\$ 905.00	\$ 5,882.50
Jordan Sartell	11/26/18	H. - Motion Practice	review, provide comment on co-counsel's draft response to M2D; confer in firm re same	1.8	\$ 465.00	\$ 837.00
James Francis	11/26/18	H. - Motion Practice	Rev. MTD; research reseller claim/argument; edit/revise brief	1.6	\$ 905.00	\$ 1,448.00
John Soumilas	11/26/18	H. - Motion Practice	Review and revise response in opp to MTD; confer with J.Satrell re coordinating red lined changes; correspondence with co-counsel.	3.7	\$ 805.00	\$ 2,978.50
Lauren Brennan	11/26/18	H. - Motion Practice	Confer with co-counsel re: opp to MTD.	0.3	\$ 465.00	\$ 139.50
Lauren Brennan	11/27/18	H. - Motion Practice	Reviewed opposition to MTD.	0.2	\$ 465.00	\$ 93.00
John Soumilas	12/04/18	H. - Motion Practice	Review D's reply; notes	0.9	\$ 805.00	\$ 724.50
Jordan Sartell	12/04/18	H. - Motion Practice	review defendant's reply in support of its M2D	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	12/04/18	H. - Motion Practice	Reviewed reply re MTD.	0.2	\$ 465.00	\$ 93.00
John Soumilas	12/05/18	H. - Motion Practice	Correspondence/ coordination re 12/10 hearing on motion to dismiss	0.3	\$ 805.00	\$ 241.50
John Soumilas	12/06/18	H. - Motion Practice	Review ECF re motion to dismiss submission; correspondence among P's counsel re discovery, call to discuss strategy; notes to file	0.7	\$ 805.00	\$ 563.50
Paralegal	12/06/18	H. - Motion Practice	Download Court's order; read and identify removal of case deadline/event contained therein; remove case event from litigation calendar.	0.4	\$ 305.00	\$ 122.00
Lauren Brennan	12/06/18	H. - Motion Practice	Reviewed order vacating oral argument.	0.2	\$ 465.00	\$ 93.00
John Soumilas	12/10/18	D.- Disclosures and Rule 16 Conf.	Call with co-counsel re discovery plan; meet with L.Brenann and paralegal re draft written discovery and dep notices.	0.9	\$ 805.00	\$ 724.50
James Francis	12/10/18	E. - Written Discovery	t/c w/co-counsel re: discovery plans; meet with JS	0.4	\$ 905.00	\$ 362.00
Lauren Brennan	12/10/18	E. - Written Discovery	Confer with JS and JK re: drafting of discovery requests.	0.2	\$ 465.00	\$ 93.00
Paralegal	12/11/18	E. - Written Discovery	Confer with JS, LKWB; model a draft set of interrogatories in this case based off of interrogatories in another case.	2.4	\$ 305.00	\$ 732.00
Lauren Brennan	12/12/18	E. - Written Discovery	Confer with JK re: drafting written discovery.	0.2	\$ 465.00	\$ 93.00
John Soumilas	12/13/18	E. - Written Discovery	Review and reply to correspondence from co-counsel re discovery scheduling; review status of drafting written discovery.	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Lauren Brennan	12/17/18	D.- Disclosures and Rule 16 Conf.	Confer with JMS re: CMC report.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	12/17/18	D.- Disclosures and Rule 16 Conf.	confer in firm w/LKWB re case mgmt report	0.2	\$ 465.00	\$ 93.00
John Soumilas	12/18/18	D.- Disclosures and Rule 16 Conf.	Review correspondence to and from D counsel re 26(f) meeting	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	12/28/18	D.- Disclosures and Rule 16 Conf.	review materials related to and begin preparing plaintiff's portions of joint case management statement for conferral w/OC	0.2	\$ 465.00	\$ 93.00
John Soumilas	01/02/19	D.- Disclosures and Rule 16 Conf.	Review ECF / rules re 26f report / disclosures.	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	01/03/19	D.- Disclosures and Rule 16 Conf.	continue to draft scheduling report	1.0	\$ 465.00	\$ 465.00
Jordan Sartell	01/04/19	D.- Disclosures and Rule 16 Conf.	confer in firm w/JS re joint scheduling report draft; continue preparing same	2.6	\$ 465.00	\$ 1,209.00
John Soumilas	01/04/19	E. - Written Discovery	Call with J. Sartell re Rule 26f report, discovery plan, and draft of written discovery for next week.	1.4	\$ 805.00	\$ 1,127.00
Jordan Sartell	01/05/19	D.- Disclosures and Rule 16 Conf.	finalize joint scheduling report draft; send to OC, Co-C; confer w/co-counsel re planning meeting	1.6	\$ 465.00	\$ 744.00
John Soumilas	01/07/19	D.- Disclosures and Rule 16 Conf.	correspondence from and to D counsel and meeting with J.Sartell re 26(f) planning report	0.3	\$ 805.00	\$ 241.50
Jordan Sartell	01/07/19	E. - Written Discovery	confer w/co-counsel re written discovery planning	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/07/19	D.- Disclosures and Rule 16 Conf.	confer w/OC re conference to discuss joint scheduling report	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/07/19	D.- Disclosures and Rule 16 Conf.	confer in firm w/JS, LKWB re attendance of R 16 conference	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	01/07/19	D.- Disclosures and Rule 16 Conf.	Confer with JMS and JS re: status of CMC report.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/08/19	D.- Disclosures and Rule 16 Conf.	prepare for R 26 conference call w/OC, CC; participate in same; review and revise proposed scheduling report after conference; confer w/OC, CC re same; finalize and prep for filing	1.7	\$ 465.00	\$ 790.50
John Soumilas	01/08/19	D.- Disclosures and Rule 16 Conf.	Correspondence from D counsel re 26(f) report; confer internally re same and upcoming Rule 16 conference.	1.6	\$ 805.00	\$ 1,288.00
Jordan Sartell	01/08/19	E. - Written Discovery	review, revise drafts of written discovery requests	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	01/09/19	E. - Written Discovery	continue to draft written discovery to defendant in preparation for conferral w/co-counsel	2.0	\$ 465.00	\$ 930.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	01/09/19	D.- Disclosures and Rule 16 Conf.	prep clean Word version of joint scheduling report for provision to the court; confer w/CC re same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/10/19	E. - Written Discovery	finalize written discovery drafts, share in firm and w/CC (2.7); confer w/JS, AET re same and discovery strategy/planning (.5); email to all co-counsel summarizing same (.3)	3.5	\$ 465.00	\$ 1,627.50
John Soumilas	01/10/19	E. - Written Discovery	review and revise rogs and rpd's, and also dep notices; call with co-counsel re strategy going forward and Rule 16 conference attendance	1.4	\$ 805.00	\$ 1,127.00
Jordan Sartell	02/01/19	H. - Motion Practice	confer w/client re status of M2D; court's having taken it under advisement	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	02/06/19	E. - Written Discovery	review correspondence w/CC; confer re discovery w/JS, RB; finalize and prepare to serve initial discovery requests	0.6	\$ 465.00	\$ 279.00
John Soumilas	02/06/19	G. - Depositions	Correspondence and meeting re doc requests and dep notices to be served	0.3	\$ 805.00	\$ 241.50
Jordan Sartell	02/11/19	E. - Written Discovery	finalize and service written discovery, depo notice; confer w/CC MC re same	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	02/26/19	G. - Depositions	review OC's objection to deposition notice; confer w/CC re same	0.4	\$ 465.00	\$ 186.00
Paralegal	03/07/19	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines to litigation calendar.	0.6	\$ 305.00	\$ 183.00
Paralegal	03/07/19	A. - File Admin	Field call from defense counsel re: possible extension of time for discovery responses; forward call to JMS for further process.	0.6	\$ 305.00	\$ 183.00
Jordan Sartell	03/07/19	E. - Written Discovery	confer w/JK, co-counsel re OC's request for additional time to respond	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/08/19	E. - Written Discovery	review local rules re objections to notices of deposition; correspond w/OC re request for extension; deposition dates in late March	0.6	\$ 465.00	\$ 279.00
Paralegal	03/11/19	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.8	\$ 305.00	\$ 244.00
Jordan Sartell	03/11/19	E. - Written Discovery	review correspondence b/t co-counsel, OC re extension; confer w/co-counsel re new deadline, scheduling previously noticed deposition; confer w/JK re new deadlines	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	03/19/19	G. - Depositions	confer w/CC, OC re rescheduling deposition of 30(b)(1) witness	0.4	\$ 465.00	\$ 186.00
James Francis	03/19/19	H. - Motion Practice	review Ct decision re 12b6; meet with JS re next steps	1.7	\$ 905.00	\$ 1,538.50
Jordan Sartell	03/20/19	H. - Motion Practice	review ECF 20, memo opinion and order denying M2D; confer w/co-counsel re same, implications for deposition/discovery pressure	0.6	\$ 465.00	\$ 279.00
Lauren Brennan	03/20/19	H. - Motion Practice	Reviewed order denying MTD.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/22/19	E. - Written Discovery	email to OC re discovery responses; review same; request M&C re same	1.1	\$ 465.00	\$ 511.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	03/27/19	E. - Written Discovery	add'l email w/OC re availability to M&C; confer w/LKWB re disc.	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	03/27/19	E. - Written Discovery	Confer with JMS re: discovery.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/01/19	E. - Written Discovery	prep for, M&C w/OC re Def's discovery responses, memo to file, email to CC re same	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	04/03/19	E. - Written Discovery	continue M&C conference w/OC, AET, MAC (.5); draft follow up correspondence re same (.6)	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	04/04/19	C. - Pleadings and service	review def's answer and affirmative defenses	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/08/19	H. - Motion Practice	review LR 251, other joint statements re discovery dispute from E.D. Cal. cases; begin drafting motion to compel documents from defendant; confer w/co-counsel re same	2.4	\$ 465.00	\$ 1,116.00
John Soumilas	04/08/19	H. - Motion Practice	review research re affirmative defenses.	0.4	\$ 805.00	\$ 322.00
James Francis	04/08/19	H. - Motion Practice	review draft motion to compel, discuss discovery issues with JS	1.5	\$ 905.00	\$ 1,357.50
Jordan Sartell	04/09/19	H. - Motion Practice	confer w/cc re USMJ's request for conference re motion to compel	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	04/10/19	E. - Written Discovery	review written discovery from defendant; calendar due dates	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	04/10/19	H. - Motion Practice	review ECF 23, 24, noting dates for discovery conference; confer w/co-counsel re same	0.4	\$ 465.00	\$ 186.00
Paralegal	04/10/19	A. - File Admin	Download Court's Minute Order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.4	\$ 305.00	\$ 122.00
Lauren Brennan	04/10/19	H. - Motion Practice	Reviewed order re: discovery dispute; motion to compel.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/11/19	D.- Disclosures and Rule 16 Conf.	prepare plaintiff's initial disclosures; confer w/cc re same	1.9	\$ 465.00	\$ 883.50
Jordan Sartell	04/11/19	E. - Written Discovery	confer w/OC re additional time to M&C per court's order	0.3	\$ 465.00	\$ 139.50
Paralegal	04/15/19	E. - Written Discovery	Format and finalize discovery, serve on opposing party by email and first class mail.	1.1	\$ 305.00	\$ 335.50
Jordan Sartell	04/15/19	D.- Disclosures and Rule 16 Conf.	revise draft initial disclosures, confer w/co-counsel, JK re service of same	0.5	\$ 465.00	\$ 232.50
John Soumilas	04/15/19	D.- Disclosures and Rule 16 Conf.	Review P's initial disclosures, and correspondence re same	0.3	\$ 805.00	\$ 241.50
John Soumilas	04/15/19	E. - Written Discovery	review correspondence re meet and confer	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	04/16/19	E. - Written Discovery	add'l M&C per court order w/OC JT and co-counsel AET re PI's request for documents re Def's relationship w/car dealership; review documents re Plaintiff produced by Def (.2); confer w/co-counsel re same	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	04/18/19	H. - Motion Practice	prepare PI's position paper re motion to compel; confer w/CC AET re same	2.1	\$ 465.00	\$ 976.50
John Soumilas	04/19/19	E. - Written Discovery	review letter re discovery dispute	0.3	\$ 805.00	\$ 241.50
Jordan Sartell	04/25/19	H. - Motion Practice	confer w/CC re, review proposed order compelling documents in response to RFP 6	0.4	\$ 465.00	\$ 186.00
Paralegal	04/26/19	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines to litigation calendar accordingly.	0.6	\$ 305.00	\$ 183.00
Jordan Sartell	04/26/19	G. - Depositions	confer w/CC MAC re upcoming deposition of Def's president	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/29/19	G. - Depositions	confirm that 4/30 deposition is going forward, necessities scheduled; review correspondence from OC re stipulated order, confer w/CC re same; confer w/CC re protective order draft	0.6	\$ 465.00	\$ 279.00
John Soumilas	04/29/19	E. - Written Discovery	review correspondence re discovery dispute; court order compelling	0.5	\$ 805.00	\$ 402.50
Jordan Sartell	04/29/19	E. - Written Discovery	review defendant's production of Norm Reeves contract, 11/2017 to present invoices	0.2	\$ 465.00	\$ 93.00
Paralegal	04/30/19	A. - File Admin	Download Court's Order; read and identify case deadlines contained therein or affected by the Order; add and/or modify case deadlines on litigation calendar accordingly.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	04/30/19	G. - Depositions	confer w/CC re deposition of Def's president; re proposed confidentiality order, related issues	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/02/19	G. - Depositions	confer w/cc MAC re yesterday's deposition of Def's President; schedule follow up conference among counsel	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	05/03/19	G. - Depositions	confer w/co-counsel re time to discuss 4/30 deposition; provide update to client re status of case	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	05/06/19	E. - Written Discovery	confer w/RB re discovery responses	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	05/07/19	G. - Depositions	confer w/CC re rescheduling depo debrief, written discovery plan	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/08/19	E. - Written Discovery	begin drafting responses to Def's 'rogs	0.7	\$ 465.00	\$ 325.50
James Francis	05/09/19	E. - Written Discovery	rev JS memo re dep and next steps; review file, documents obtained in discovery	1.5	\$ 905.00	\$ 1,357.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	05/09/19	E. - Written Discovery	continue preparing Plaintiff's objections and responses to defendant's discovery requests	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	05/09/19	G. - Depositions	confer w/co-counsel re same and re depo of Def's CEO, draft summary memo re discovery strategy to CC	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	05/10/19	E. - Written Discovery	confer in firm w/JK re responses to Def's RFAs	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	05/10/19	D.- Disclosures and Rule 16 Conf.	confer w/OC re missing initial disclosures	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/13/19	E. - Written Discovery	continue to draft PL's objections and responses to Def's discovery requests	1.4	\$ 465.00	\$ 651.00
Paralegal	05/13/19	E. - Written Discovery	Research case to be included in discovery responses; share with JMS.	1.4	\$ 305.00	\$ 427.00
Jordan Sartell	05/14/19	E. - Written Discovery	continue to draft objections and answers to Def written discovery, prepare documents for production (1.9), review interrogatory responses w/CL (.6)	2.5	\$ 465.00	\$ 1,162.50
Paralegal	05/14/19	E. - Written Discovery	Email w/ J. Sartell re client verification; email client for verification signature; confer w/ J. Sartell re plaintiff's doc prod.	0.9	\$ 305.00	\$ 274.50
Paralegal	05/14/19	E. - Written Discovery	Confer w/ J. Sartell re plaintiff's doc prod.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	05/15/19	E. - Written Discovery	review, revise, finalize objections and answers to Def written discovery and serve same (.9); discuss document production w/AET, client (.8)	1.7	\$ 465.00	\$ 790.50
Jordan Sartell	05/16/19	E. - Written Discovery	confer w/CC re production of materials obtained during Experian litigation	0.2	\$ 465.00	\$ 93.00
James Francis	05/17/19	E. - Written Discovery	Rev. AT & JS emails & memos re: next steps; rev. dep of Larsen	1.3	\$ 905.00	\$ 1,176.50
Jordan Sartell	05/20/19	E. - Written Discovery	review correspondence from OC re merits of case; finalize plaintiff's document production; confer w/CC re discovery strategy	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	05/21/19	E. - Written Discovery	finalize plaintiff's document production and serve on OC	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	05/22/19	E. - Written Discovery	confer w/CC, serve plaintiff's documents; confer w/OC re initial disclosures	0.9	\$ 465.00	\$ 418.50
James Francis	05/22/19	E. - Written Discovery	r/r correspondence from OC re initial disclosures, virility of claim;	0.5	\$ 905.00	\$ 452.50
Jordan Sartell	05/23/19	E. - Written Discovery	confer w/client re document production, service of same	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	05/28/19	E. - Written Discovery	review correspondence among co-counsel, OC; prepare additional correspondence re initial disclosures, insurance issues; prepare 2d RFPs, circulate among co-counsel	1.4	\$ 465.00	\$ 651.00
Paralegal	05/28/19	E. - Written Discovery	Review correspondence over insurance policy document request.	0.3	\$ 305.00	\$ 91.50
Paralegal	05/29/19	E. - Written Discovery	Mail paper copy of Plaintiff's Second Requests for the Production of Documents.	0.5	\$ 305.00	\$ 152.50
Jordan Sartell	05/29/19	E. - Written Discovery	finalize and serve PI's 2d Doc Requests	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	06/03/19	D.- Disclosures and Rule 16 Conf.	revise previous draft joint discovery statement	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	06/04/19	D.- Disclosures and Rule 16 Conf.	review, revise updated joint status report and scheduling proposal; circulate among counsel	0.9	\$ 465.00	\$ 418.50
Lauren Brennan	06/04/19	E. - Written Discovery	Confer with JS and JMS re: discovery status.	0.2	\$ 465.00	\$ 93.00
Paralegal	06/05/19	A. - File Admin	Investigate local rules, orders in case regarding telephonic appearance for case management conference; call to judge's clerk; report back results of inquiry to attorneys affected.	2.2	\$ 305.00	\$ 671.00
Jordan Sartell	06/06/19	D.- Disclosures and Rule 16 Conf.	confer in firm w/JK re revisions to joint scheduling proposal, with OC re same	1.6	\$ 465.00	\$ 744.00
Paralegal	06/06/19	A. - File Admin	Call to judge's clerk regarding telephonic appearance; adjustment to draft of status report to reflect same, in accordance with prior order.	1.4	\$ 305.00	\$ 427.00
James Francis	06/06/19	D.- Disclosures and Rule 16 Conf.	rev. joint CMC, edit/revise	1.3	\$ 905.00	\$ 1,176.50
Jordan Sartell	06/07/19	D.- Disclosures and Rule 16 Conf.	review requirements related to telephonic participation in R. 16 conf.	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	06/12/19	D.- Disclosures and Rule 16 Conf.	confer w/CC, OC, courtroom deputy re tomorrow's scheduling conference	0.6	\$ 465.00	\$ 279.00
Paralegal	06/12/19	A. - File Admin	Receive Court's order re: Scheduling Conference; place appointment on litigation calendar for same.	0.4	\$ 305.00	\$ 122.00
John Soumilas	06/12/19	D.- Disclosures and Rule 16 Conf.	Review correspondence re next status conference with court	0.2	\$ 805.00	\$ 161.00
James Francis	06/13/19	D.- Disclosures and Rule 16 Conf.	Prep for Rule 16 conf.	1.7	\$ 905.00	\$ 1,538.50
James Francis	06/13/19	D.- Disclosures and Rule 16 Conf.	attend Rule 16 conf	0.6	\$ 905.00	\$ 543.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	06/13/19	D.- Disclosures and Rule 16 Conf.	confer w/JAF, AET re R. 16 conference	0.5	\$ 465.00	\$ 232.50
Paralegal	06/13/19	A. - File Admin	Arrangements to get JAF and JS registered for ECF in E.D. Cal. for the case.	0.4	\$ 305.00	\$ 122.00
Paralegal	06/14/19	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.6	\$ 305.00	\$ 183.00
Jordan Sartell	06/17/19	D.- Disclosures and Rule 16 Conf.	review scheduling order, ECF 31, confer w/JK re same	0.4	\$ 465.00	\$ 186.00
Paralegal	06/18/19	A. - File Admin	Add deadline to litigation calendar contained in earlier order of the Court.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	06/21/19	G. - Depositions	review discovery responses, status of def's production; prepare deposition notice for Def's technical "expert"	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/25/19	E. - Written Discovery	assess status of written discovery; complete review of depo transcript of Daren Larsen, prepare additional document requests, depo notices; confer w/CC re same	2.2	\$ 465.00	\$ 1,023.00
Jordan Sartell	06/25/19	E. - Written Discovery	confer w/client re scheduling order, status of discovery	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/26/19	G. - Depositions	continue to prepare additional document requests and interrogatories; prepare M&C correspondence re existing 'rogs	2.3	\$ 465.00	\$ 1,069.50
Jordan Sartell	06/27/19	G. - Depositions	confer w/CC re draft M&C correspondence; discovery strategy	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	07/02/19	E. - Written Discovery	confer in firm and w/CC re defendant's request for extension, discovery status, depositions, etc.; respond to OC email concerning extension of time	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	07/09/19	E. - Written Discovery	confer w/CC, OC, plaintiff re deposition dates and locations	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	07/09/19	E. - Written Discovery	update M&C correspondence to opposing counsel after receipt of last week's objections	0.6	\$ 465.00	\$ 279.00
John Soumilas	07/10/19	G. - Depositions	review corresp re dep	0.3	\$ 805.00	\$ 241.50
Jordan Sartell	07/10/19	G. - Depositions	confer w/client re deposition availability	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/12/19	G. - Depositions	confer w/client, CC re Pl's availability for deposition	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	07/18/19	G. - Depositions	confer w/CC re depo notice to Def witness, revise existing draft	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/18/19	E. - Written Discovery	f/u w/OC re objections to 2d Doc Requests, other deficiencies	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/22/19	G. - Depositions	serve deposition notice for Frank Larsen; confer w/CC re same, case deadlines	0.4	\$ 465.00	\$ 186.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	07/23/19	G. - Depositions	confer w/CC re revised date for F. Larsen depo; revise and serve notice re same	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	07/24/19	G. - Depositions	confer w/JK re upcoming deposition dates, locations	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	07/30/19	E. - Written Discovery	f/u w/OC re insurance documents, objections to 2d RsPD	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/31/19	E. - Written Discovery	confer w/CC, OC re scheduling M&C	0.2	\$ 465.00	\$ 93.00
John Soumilas	08/01/19	E. - Written Discovery	review correspondent re meet and confer conference; review select discovery to date. .	0.8	\$ 805.00	\$ 644.00
Jordan Sartell	08/02/19	E. - Written Discovery	confer w/co-counsel AET prior to M&C call w/OC (.9); confer re respective positions on written discovery (.3); confer w/CC re next steps (.4); make request for informal discovery dispute assistance to court (.3)	1.9	\$ 465.00	\$ 883.50
Jordan Sartell	08/05/19	H. - Motion Practice	confer w/OC, CC re USMJ availability and parties' discovery dispute	0.6	\$ 465.00	\$ 279.00
John Soumilas	08/05/19	E. - Written Discovery	Review correspondence re discovery dispute	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	08/16/19	G. - Depositions	confer w/CC re prepping client for his deposition	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/16/19	H. - Motion Practice	begin drafting formal motion to compel	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/21/19	G. - Depositions	confer w/CC re defense of Pl's deposition; travel to deposition location (11.3); prepare witness for deposition (2.1)	13.4	\$ 465.00	\$ 6,231.00
Jordan Sartell	08/21/19	E. - Written Discovery	confer w/CC re motion to compel	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	08/22/19	G. - Depositions	final prep for, defense and debrief of plaintiff's deposition; confer w/co-counsel re same	7.8	\$ 465.00	\$ 3,627.00
Jordan Sartell	08/23/19	G. - Depositions	plaintiff deposition travel	7.5	\$ 465.00	\$ 3,487.50
Jordan Sartell	08/23/19	E. - Written Discovery	drafting motion to compel; confer w/CC re same	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	08/26/19	G. - Depositions	confer w/CC re remaining to do items in R. 23 phase	1.7	\$ 465.00	\$ 790.50
Jordan Sartell	08/26/19	H. - Motion Practice	confer w/all counsel, court clerk, re availability of USMJ re discovery dispute	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	08/26/19	G. - Depositions	confer w/CC, OC re F. Larsen's unavailability	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/27/19	G. - Depositions	confer w/JK, AET re rescheduling F. Larsen depo	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	08/27/19	G. - Depositions	confer w/AET re potential deposition exhibits for F. Larsen depo	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/28/19	E. - Written Discovery	draft M&C correspondence w/OC regarding all outstanding discovery and depo issues, discovery hearing date; confer w/AET re same	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	08/29/19	E. - Written Discovery	confer w/OC re outstanding discovery issues	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	09/03/19	H. - Motion Practice	review correspondence from opposing counsel re deposition scheduling, discovery hearing; confer w/CC re same; draft notice of availability for discovery conference to SKO's deputy; calendar deadlines re 9/13 summary and 9/20 hearing	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	09/03/19	G. - Depositions	review PI's deposition transcript; confer w/PI re same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/11/19	H. - Motion Practice	begin preparing statement of discovery dispute	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	09/12/19	H. - Motion Practice	continue drafting statement of discovery dispute	1.9	\$ 465.00	\$ 883.50
Jordan Sartell	09/12/19	H. - Motion Practice	review Def's latest production re tender of complaint to Ins. Co.; confer w/CC re same	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	09/13/19	H. - Motion Practice	review, finalize discover dispute summary, exhibits; dispatch same to chambers, cc'ing all counsel	2.6	\$ 465.00	\$ 1,209.00
James Francis	09/13/19	H. - Motion Practice	review/edit discovery dispute letter to court	1.7	\$ 905.00	\$ 1,538.50
Jordan Sartell	09/20/19	H. - Motion Practice	confer w/CC re upcoming motion hearing; attend same telephonically; debrief same w/CC AET	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	09/23/19	G. - Depositions	draft correspondence to Tamborelli re depositions, documents; confer w/AET, MAC re same; review modified scheduling order	0.8	\$ 465.00	\$ 372.00
John Soumilas	09/23/19	H. - Motion Practice	review memo re motion to compel order and strategy re identifying class	0.5	\$ 805.00	\$ 402.50
Lauren Brennan	09/23/19	E. - Written Discovery	Confer with JS and JMS re: compelled production and strategy.	0.2	\$ 465.00	\$ 93.00
Paralegal	09/24/19	A. - File Admin	Download Court's Order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.7	\$ 305.00	\$ 213.50
Jordan Sartell	09/30/19	E. - Written Discovery	f/u w/OC re compelled depositions, documents	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	10/01/19	G. - Depositions	another request to opposing counsel for some response re compelled documents, deposition dates	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/02/19	H. - Motion Practice	confer w/CC re OC's assertion that he would be appealing USMJ order via now abrogated FRCP 75; begin outline of motion for sanctions	0.7	\$ 465.00	\$ 325.50
John Soumilas	10/02/19	H. - Motion Practice	review corresp re motion for sanctions; review status of compelled production	0.5	\$ 805.00	\$ 402.50
Jordan Sartell	10/03/19	H. - Motion Practice	continue research and drafting motion for sanctions	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	10/04/19	H. - Motion Practice	continue research and drafting motion for sanctions; confer w/AET re same, strategy regarding particular sanctions requested	2.1	\$ 465.00	\$ 976.50
Jordan Sartell	10/04/19	E. - Written Discovery	review proposed confidentiality order; confer w/CC AET re same	0.3	\$ 465.00	\$ 139.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	10/08/19	H. - Motion Practice	prepare response to defendant's "objections" to USMJ's ruling on discovery dispute	2.7	\$ 465.00	\$ 1,255.50
Jordan Sartell	10/09/19	H. - Motion Practice	continue drafting opposition to Defendant's request for reconsideration	2.1	\$ 465.00	\$ 976.50
Jordan Sartell	10/10/19	H. - Motion Practice	continue drafting opposition to Defendant's request for reconsideration; confer w/JS, CC re same	1.1	\$ 465.00	\$ 511.50
John Soumilas	10/10/19	H. - Motion Practice	confer with J. Sartell response of D objections to order compelling production	0.7	\$ 805.00	\$ 563.50
Jordan Sartell	10/11/19	H. - Motion Practice	confer w/OC re request for extension to respond to request for reconsideration (.2); prepare for M&C w/OC re outstanding discovery issues per Dkt. 37 (.8); attempt to M&C w/OC (left vm) (.2); continue research and drafting of Opposition to Request for Reconsideration (1.3); confer w/JS re same (.4)	2.9	\$ 465.00	\$ 1,348.50
Paralegal	10/11/19	H. - Motion Practice	Research on cases in E.D. Cal. regarding ex parte motions for extensions of time; relay results to attorney.	2.4	\$ 305.00	\$ 732.00
John Soumilas	10/11/19	H. - Motion Practice	Review D's objections to order compelling production; confer with J. Sartell inertially about response and need for expert affidavit; call expert	2.4	\$ 805.00	\$ 1,932.00
Jordan Sartell	10/14/19	H. - Motion Practice	continue to draft, revise opposition to request for reconsideration	3.9	\$ 465.00	\$ 1,813.50
Jordan Sartell	10/14/19	H. - Motion Practice	M&C w/OC re outstanding discovery issues; confirm same via email	1.1	\$ 465.00	\$ 511.50
James Francis	10/14/19	H. - Motion Practice	review/edit/revise response to CBC objections to R&R order for discovery	3.3	\$ 905.00	\$ 2,986.50
Jordan Sartell	10/15/19	H. - Motion Practice	continue to draft, revise opposition to request for reconsideration; confer w/JS re same; finalize and file same	7.6	\$ 465.00	\$ 3,534.00
John Soumilas	10/15/19	H. - Motion Practice	review and revise opp to D objections to motion to compel	3.7	\$ 805.00	\$ 2,978.50
Paralegal	10/15/19	H. - Motion Practice	Assistance in drafting process of opposition papers to motion/request for reconsideration of discovery order.	0.6	\$ 305.00	\$ 183.00
Paralegal	10/16/19	H. - Motion Practice	Print out courtesy copy for judge's chambers in accordance with Judge Ishii's practices; ship to clerk's office, per instructions.	0.9	\$ 305.00	\$ 274.50
Jordan Sartell	10/18/19	H. - Motion Practice	review add'l declaration in support of Request for Reconsideration; begin drafting motion to strike same	1.3	\$ 465.00	\$ 604.50
John Soumilas	10/18/19	H. - Motion Practice	Review further declaration of D. Larsen; confer internally re motion to strike; legal research re same.	1.1	\$ 805.00	\$ 885.50
Jordan Sartell	10/21/19	H. - Motion Practice	review add'l declaration in support of Request for Reconsideration; begin drafting motion to strike same	1.1	\$ 465.00	\$ 511.50
John Soumilas	10/22/19	H. - Motion Practice	corresp/ research re motion to strike reply dec	0.8	\$ 805.00	\$ 644.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	10/22/19	H. - Motion Practice	continue to review, revise motion to strike; confer in firm w/JS re same; finalize and file same, noticing for 11/25	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	10/28/19	H. - Motion Practice	confer w/OC re extension request; begin preparing motion to that effect	2.2	\$ 465.00	\$ 1,023.00
Paralegal	10/29/19	H. - Motion Practice	Research E.D. Cal. motion practice, judge's individual practices, edit, format, finalize and file Ex Parte Motion for Extension of Time	2.3	\$ 305.00	\$ 701.50
Jordan Sartell	10/29/19	H. - Motion Practice	finalize and file motion to extend case management deadlines	1.4	\$ 465.00	\$ 651.00
Paralegal	11/05/19	A. - File Admin	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	11/08/19	H. - Motion Practice	review ECF 44, order denying request for reconsideration and related motion to strike; confer w/CC re same	0.4	\$ 465.00	\$ 186.00
Paralegal	11/08/19	E. - Written Discovery	Review Court's order re: discovery dispute; confer with JMS re: same.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	11/11/19	G. - Depositions	prepare deposition notices now that district court has denied request for reconsideration; revise proposed protective order; confer w/CC re same	1.1	\$ 465.00	\$ 511.50
John Soumilas	11/11/19	H. - Motion Practice	review corresp re latest court order on compelled production; corresp re next steps	0.4	\$ 805.00	\$ 322.00
Lauren Brennan	11/12/19	E. - Written Discovery	Confer in firm re: written discovery and strategy.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	11/12/19	H. - Motion Practice	review ECF 45 re vacatur of hearing date, deadline for Def's response	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	11/13/19	E. - Written Discovery	review ECF 47 denying w/o prejudice parties' stipulated protective order	0.2	\$ 465.00	\$ 93.00
Paralegal	11/14/19	A. - File Admin	Download and review court's order; identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	11/20/19	H. - Motion Practice	review def's opposition to motion to extend schedule; confer w/CC re same	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	11/22/19	E. - Written Discovery	review Court's order (ECF 49) granting motion to extend (.3); begin draft letter to OC re outstanding discovery items and depositions (.3)	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	11/25/19	E. - Written Discovery	continue drafting letter to OC re outstanding discovery items and depositions; confer w/CI re status of case	1.0	\$ 465.00	\$ 465.00
Paralegal	11/25/19	A. - File Admin	Download and review Court's order; add and/or modify case deadlines on litigation calendar in accordance with the text thereof.	0.4	\$ 305.00	\$ 122.00
John Soumilas	11/26/19	G. - Depositions	Corresp from D counsel re more excuses about compelled depositions	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	12/02/19	H. - Motion Practice	begin drafting motion to compel and for sanctions; draft correspondence to OC after leaving voice mail	1.1	\$ 465.00	\$ 511.50
John Soumilas	12/03/19	E. - Written Discovery	review correct re compelled production; plan	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	12/03/19	G. - Depositions	review correspondence from OC; confer w/CC re same; prepare response draft	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	12/04/19	G. - Depositions	confer w/OC re outstanding discovery issues; debrief same w/AET; prepare summary correspondence to OC	1.7	\$ 465.00	\$ 790.50
Jordan Sartell	12/04/19	G. - Depositions	confer w/CC re upcoming call w/OC re scheduling depositions, stonewalling	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	12/04/19	G. - Depositions	Confer in firm re: compelled deps.	0.2	\$ 465.00	\$ 93.00
John Soumilas	12/05/19	E. - Written Discovery	corresp from D counsel re discovery dispute	0.3	\$ 805.00	\$ 241.50
Jordan Sartell	12/05/19	H. - Motion Practice	correspondence w/SKO clerk, OC re scheduling discovery conference	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	12/09/19	H. - Motion Practice	draft plaintiff's discover dispute position paper	4.9	\$ 465.00	\$ 2,278.50
Paralegal	12/09/19	H. - Motion Practice	Confer with JMS, draft an Appendix of Exhibits to new motion.	1.7	\$ 305.00	\$ 518.50
Jordan Sartell	12/10/19	H. - Motion Practice	draft plaintiff's discover dispute position paper; finalize same and exhibits; confer w/CC re final revisions; submit to USMJ	5.1	\$ 465.00	\$ 2,371.50
John Soumilas	12/10/19	H. - Motion Practice	review CBC letter brief; conf with J. Sartell re ours	0.9	\$ 805.00	\$ 724.50
Paralegal	12/11/19	H. - Motion Practice	Arrange for paper copies of previous day's motion, with exhibits, to be sent to Judge Oberto.	0.7	\$ 305.00	\$ 213.50
Jordan Sartell	12/11/19	E. - Written Discovery	confer w/OC re proposed revisions to protective order	0.2	\$ 465.00	\$ 93.00
Paralegal	12/13/19	A. - File Admin	Download Court's order; add item to litigation calendar for telephone conference on discovery dispute.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	12/17/19	G. - Depositions	confer w/CC AET re potential data expert	0.2	\$ 465.00	\$ 93.00
Paralegal	12/20/19	A. - File Admin	Download, review and analyze Court's order; confer with JMS re: same.	0.5	\$ 305.00	\$ 152.50
John Soumilas	12/31/19	G. - Depositions	review correspondence from D counsel re deps	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	01/02/20	G. - Depositions	review correspondence among counsel re setting deposition dates of compelled witnesses	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/03/20	G. - Depositions	review correspondence among counsel re setting deposition dates of compelled witnesses	0.2	\$ 465.00	\$ 93.00
John Soumilas	01/07/20	G. - Depositions	review corresp re deps	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	01/08/20	G. - Depositions	review outline and materials from consulting expert in advance of 1/15 deposition	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	01/10/20	G. - Depositions	Correspondence with co-counsel regarding logistics of upcoming depositions.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	01/10/20	G. - Depositions	confer w/JK, CC MAC, AET re next week's depositions	0.2	\$ 465.00	\$ 93.00
John Soumilas	01/13/20	G. - Depositions	review deposition outline for Leanne Cobb and David Daniel and status of case	0.7	\$ 805.00	\$ 563.50
Paralegal	01/16/20	E. - Written Discovery	Provide copies of previous discovery requests to co-counsel.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	01/16/20	E. - Written Discovery	review correspondence to Def C re 3d RFPs, RFPs	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/21/20	E. - Written Discovery	review correspondence among counsel re stipulation to extend discovery schedule	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	01/21/20	H. - Motion Practice	correspondence w/CC re whether additional motion to compel and for extension of schedule will be required in light of def counsel's refusal to stipulate	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/22/20	H. - Motion Practice	review draft motion to amend schedule; confer w/CC re same; review, revise draft motion for extension of time	1.8	\$ 465.00	\$ 837.00
Jordan Sartell	01/24/20	H. - Motion Practice	review rough deposition transcript re supporting statements for motion for extension of time	0.4	\$ 465.00	\$ 186.00
Paralegal	01/24/20	A. - File Admin	Analysis of Court's order	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	01/27/20	E. - Written Discovery	confer w/CC AET and data analyst JJ re deriving class membership information from def's database	1.7	\$ 465.00	\$ 790.50
Jordan Sartell	01/27/20	E. - Written Discovery	review ECF 53 re def's deadline to respond to motion for extension, confer w/OC re discovery dispute paper submissions, scope of dispute post order of 12/19 and depo of F. Larsen	0.8	\$ 465.00	\$ 372.00
John Soumilas	01/27/20	H. - Motion Practice	review motion to extend deadlines and related court notices	0.5	\$ 805.00	\$ 402.50
Jordan Sartell	01/28/20	E. - Written Discovery	review and revise AET's draft M&C letter, confer w/AET re same; confer w/OC re same, schedule conference call	1.4	\$ 465.00	\$ 651.00
John Soumilas	01/28/20	E. - Written Discovery	review corresp from D counsel re latest meet and confer efforts	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	01/29/20	E. - Written Discovery	add'l correspondence w/OC re setting up M&C	0.2	\$ 465.00	\$ 93.00
Paralegal	01/30/20	E. - Written Discovery	Review and analysis of further discovery requests to Defendant.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	01/31/20	E. - Written Discovery	review M&C correspondence from Def; draft email about Def's unavailability to meet and confer re same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	02/03/20	E. - Written Discovery	review Def's M&C correspondence and respond	0.6	\$ 465.00	\$ 279.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	02/04/20	E. - Written Discovery	confer w/CC AET, data consultant JJ re response to Def's M&C letter; solicit M&C time from OC	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	02/05/20	E. - Written Discovery	add'l attempt to solicit M&C time from OC; prepare written reply to Def's response to our initial M&C proposal	2.3	\$ 465.00	\$ 1,069.50
Lauren Brennan	02/05/20	E. - Written Discovery	Confer in-firm re: status of discovery.	0.2	\$ 465.00	\$ 93.00
Paralegal	02/05/20	E. - Written Discovery	Meet and confer w/ J. Francis, J. Soumilas and J. Sartell re discovery issues and strategy for letter to Judge re discovery dispute.	0.2	\$ 305.00	\$ 61.00
Paralegal	02/05/20	A. - File Admin	Attend group discussion of status of case, strategies going forward.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	02/07/20	E. - Written Discovery	revise M&C correspondence, conference call w/OC re data production proposals; debrief w/CC AET	1.2	\$ 465.00	\$ 558.00
Paralegal	02/07/20	A. - File Admin	Download and analysis of Court's order.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	02/10/20	H. - Motion Practice	review ECF 55 re motion for extension of time; confer w/CC re 2/14 deadline for Def to file motion for protective order, strategic implications of same	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	02/13/20	E. - Written Discovery	review Def's response to 2/7/20 M&C letter	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	02/13/20	E. - Written Discovery	confer w/client re status of discovery dispute	0.2	\$ 465.00	\$ 93.00
Paralegal	02/17/20	A. - File Admin	Download Court's order; analysis re: same	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	02/17/20	H. - Motion Practice	confer w/CC re Def.'s apparently failure to file motion for protective order per ECF No 55	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	02/18/20	H. - Motion Practice	add'l conferral w/CC re Def.'s apparently failure to file motion for protective order per ECF No 55; respond to OC re same	0.6	\$ 465.00	\$ 279.00
John Soumilas	02/19/20	H. - Motion Practice	corresp from D counsel re motion for protective order	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	02/20/20	H. - Motion Practice	review ECF 56 and exhibits; def's motion for protective order	1.1	\$ 465.00	\$ 511.50
Paralegal	02/20/20	A. - File Admin	Research on deadline to respond to protective order motion.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	03/02/20	H. - Motion Practice	drafting opposition to motion for protective order, review, prepare supporting exhibits; confer in firm w/JK re declaration analysis	3.7	\$ 465.00	\$ 1,720.50
Jordan Sartell	03/03/20	H. - Motion Practice	drafting opposition to motion for protective order, review, prepare supporting exhibits; confer in w/Jaffe re declaration	4.7	\$ 465.00	\$ 2,185.50
James Francis	03/03/20	H. - Motion Practice	review/edit/revise OPP to mot for prot order	2.8	\$ 905.00	\$ 2,534.00
Jordan Sartell	03/04/20	H. - Motion Practice	drafting opposition to motion for protective order, review, prepare supporting exhibits; confer w/Jaffe re declaration	8.4	\$ 465.00	\$ 3,906.00
Paralegal	03/06/20	H. - Motion Practice	Research local rules; telephone call to chambers to inquire as to status of hearing, if any; report results back to supervising attorneys.	0.5	\$ 305.00	\$ 152.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	03/10/20	E. - Written Discovery	review Def's amended responses to Pl's 'rogs, RPDs; responses to Pl's 2d 'rog, 4th RsPD	0.6	\$ 465.00	\$ 279.00
Lauren Brennan	03/10/20	H. - Motion Practice	Confer in-firm re: case status and litigation strategy.	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/08/20	H. - Motion Practice	review LR 141.1 and revise draft proposed protective order; send request to M&C w/Def re same	1.4	\$ 465.00	\$ 651.00
Jordan Sartell	04/08/20	H. - Motion Practice	review Mag Judge Oberto's Order denying Def's motion for protective order; confer w/CC re same	1.1	\$ 465.00	\$ 511.50
Paralegal	04/08/20	A. - File Admin	Download Court's order; analysis of same.	0.4	\$ 305.00	\$ 122.00
Paralegal	04/08/20	E. - Written Discovery	Meet and confer w/ J. Soumilas, J. Sartell and J. Francis re class discovery extension and class cert motion deadline.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	04/10/20	E. - Written Discovery	f/u w/OC re revised proposed protective order draft after receiving no response	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/13/20	E. - Written Discovery	r/r correspondence re protective order; M&C w/OC re same	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	04/14/20	E. - Written Discovery	review OC's redlines to proposed protective order; confer re same; finalize and file same per Court's order	1.9	\$ 465.00	\$ 883.50
Paralegal	04/14/20	H. - Motion Practice	Research regarding local rules.	0.9	\$ 305.00	\$ 274.50
Paralegal	04/14/20	H. - Motion Practice	Meet and confer w/ J. Soumilas, J. Kabacinski and J. Sartell re d's motion for protective order and next steps/strategy for revising protective order.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	04/15/20	E. - Written Discovery	confer w/CC re plan for production of compelled database information; draft M&C correspondence to Def re same	1.5	\$ 465.00	\$ 697.50
Jordan Sartell	04/16/20	E. - Written Discovery	draft M&C correspondence to Def re outstanding 'rog, RPD requests	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/16/20	E. - Written Discovery	draft correspondence to Def re OC representation that it plans to seek reconsideration of USMJ's order denying Def's motion for protective order	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/17/20	E. - Written Discovery	review defendant's responses to latest discovery; draft M&C correspondence re same	2.5	\$ 465.00	\$ 1,162.50
Jordan Sartell	04/20/20	E. - Written Discovery	confer w/CC AET; finalize M&C correspondence to OC	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	04/22/20	H. - Motion Practice	confer w/CC re Defendant's motion to reconsider	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/23/20	E. - Written Discovery	f/u on M&C letter w/Def counsel after receiving no response	0.2	\$ 465.00	\$ 93.00
Paralegal	04/27/20	H. - Motion Practice	Research of abuse and vexatious excess process sanctions.	1.9	\$ 305.00	\$ 579.50
Jordan Sartell	04/27/20	H. - Motion Practice	confer w/CC re Def's motion for reconsideration, division of labor re response to same; drafting opposition to motion for reconsideration	1.4	\$ 465.00	\$ 651.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	04/27/20	E. - Written Discovery	confer w/OC re latest discovery deficiencies; confer w/CC re same	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	04/28/20	H. - Motion Practice	drafting opposition to motion for reconsideration; confer w/CC re same; finalize and file same	5.7	\$ 465.00	\$ 2,650.50
Paralegal	04/28/20	H. - Motion Practice	Meet and confer w/ J. Sartell and J. Soumilas re respond to motion for reconsideration.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	04/29/20	E. - Written Discovery	confer w/OC re rescheduling M&C call, necessity of final discovery position	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/01/20	H. - Motion Practice	review correspondence from Def re discovery impasse; notify judge of discovery dispute and need for briefing schedule	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	05/04/20	H. - Motion Practice	begin drafting discovery dispute position paper	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	05/05/20	H. - Motion Practice	continue drafting discovery dispute position paper	0.4	\$ 465.00	\$ 186.00
Paralegal	05/05/20	H. - Motion Practice	Meet and confer w/ J. Soumilas, J. Kabacinski and J. Sartell re draft motion to compel.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	05/06/20	H. - Motion Practice	finalize and serve discovery dispute summary	5.0	\$ 465.00	\$ 2,325.00
Jordan Sartell	05/08/20	E. - Written Discovery	confer w/client re status of case and discovery	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	05/08/20	H. - Motion Practice	review ECF 68 setting discovery dispute teleconference, calendar same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/14/20	H. - Motion Practice	prep for (2.0), argue discovery dispute (.5) before USMJ Oberto	2.5	\$ 465.00	\$ 1,162.50
Jordan Sartell	05/15/20	H. - Motion Practice	review ECF 70, confer in firm, with CC re MCC planning re remaining needed discovery	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/18/20	H. - Motion Practice	prepare redline of existing PO in light of USMJ order and 5/21 deadline; confer w/OC re same	0.5	\$ 465.00	\$ 232.50
Paralegal	05/18/20	A. - File Admin	Download Court's order; analysis re: same.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	05/18/20	H. - Motion Practice	confer w/OC re revised protective order draft	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/20/20	H. - Motion Practice	review ECF 71, denying Def's request to reconsdier USMJ's order	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/21/20	H. - Motion Practice	confer w/OC re proposed amended protective order; finalize and file same	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	05/26/20	H. - Motion Practice	review ECF 73, amended PO	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/03/20	E. - Written Discovery	confer w/OC re production of compelled information and documents	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/04/20	E. - Written Discovery	review def's latest production of compelled information and documents	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	06/04/20	E. - Written Discovery	confer w/OC re production of compelled information and documents	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	06/09/20	E. - Written Discovery	confer w/AET, eDiscovery consultant re Def's source code and Db schema production	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	06/10/20	C. - Pleadings and service	Participated in attorney meeting discussing case status and strategy.	0.2	\$ 465.00	\$ 93.00
Paralegal	06/10/20	E. - Written Discovery	Meet and confer w/ J. Soumilas, J. Francis, J. Sartell and J. Kabacinski re d's doc prod identifying reports w/ OFAC hits, OFAC matching protocol and database.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	06/15/20	E. - Written Discovery	review additional discovery requests received from Def; confer w/JK re same	0.6	\$ 465.00	\$ 279.00
Paralegal	06/15/20	E. - Written Discovery	Intake of discovery request documents; discussion with JMS re protocols of response deadlines.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	06/16/20	E. - Written Discovery	review discovery consultant's notes on Def's search algorithm	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/08/20	E. - Written Discovery	confer in firm w/JK re Def's 2d Set of discovery requests; begin drafting responses to same	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	07/09/20	E. - Written Discovery	continue drafting PI's objections and responses to Def's 2d set of discovery requests; confer w/OC, CC re same; prepare motion for protective order upon receipt of OC's refusal to grant nominal extension	4.4	\$ 465.00	\$ 2,046.00
Jordan Sartell	07/10/20	E. - Written Discovery	finalize and serve PL's responses to Def's 2d RFPs, RFAs, 'ROGs	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	07/14/20	H. - Motion Practice	reach out to OC re conferral re M4PO per LR 251(b) requirement	0.2	\$ 465.00	\$ 93.00
Paralegal	07/15/20	E. - Written Discovery	Meet and confer w/ J. Francis, J. Soumilas and J. Sartell re strategy for identifying class w/ OFAC hits.	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	07/15/20	E. - Written Discovery	Participated in meeting re: workflow and litigation strategy issues.	0.2	\$ 465.00	\$ 93.00
Paralegal	07/16/20	A. - File Admin	Call: case intro w/JMS & review discovery docs from defendant	0.5	\$ 305.00	\$ 152.50
Jordan Sartell	07/16/20	E. - Written Discovery	confer w/OC re lack of response to request to M&C re Motion for Protective Order	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/17/20	E. - Written Discovery	confer w/OC re request to M&C re Motion for Protective Order	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/20/20	H. - Motion Practice	prep for M&C w/OC re PI's motion for protective order	0.8	\$ 465.00	\$ 372.00
Paralegal	07/21/20	E. - Written Discovery	Review files produced, Call w/JMS digging into documents produced by defendant - CBC db schema & OFAC search php code, discuss liability issues, start recreation of defendant db, review notes from J Jaffe	3.7	\$ 305.00	\$ 1,128.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	07/21/20	E. - Written Discovery	confer in firm w/HMac re review of Def's OFAC-matching PHP script, available data in data-formatted SDN lists	1.5	\$ 465.00	\$ 697.50
Jordan Sartell	07/21/20	H. - Motion Practice	M&C w/OC re Pl's motion for protective order; draft confirming correspondence	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	07/27/20	H. - Motion Practice	f/u w/OC re resolution to protective order dispute	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	07/27/20	E. - Written Discovery	conver w/CC re liability insight on SDN field mapping	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/29/20	H. - Motion Practice	voicemail, f/u email to OC re Protective Order Motion; confirm agreement; prepare and file notice of withdrawal of motion	0.6	\$ 465.00	\$ 279.00
Paralegal	07/29/20	H. - Motion Practice	Edit, format, finalize and file withdrawal of motion for protective order.	0.5	\$ 305.00	\$ 152.50
Jordan Sartell	07/31/20	E. - Written Discovery	drafting supplemental responses to Def's 2d 'rogs; confer w/client re same; oversee verification and serve on Def	2.7	\$ 465.00	\$ 1,255.50
Jordan Sartell	08/14/20	E. - Written Discovery	confer w/CC AET re review of Def technical documents	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	08/24/20	E. - Written Discovery	confer w/CC AET re scheduling 30(b)(6) deposition, outstanding discovery strings	0.2	\$ 465.00	\$ 93.00
Paralegal	08/25/20	E. - Written Discovery	Plan for M&C, documenting pursuing discovery, working w/expert	0.7	\$ 305.00	\$ 213.50
Jordan Sartell	08/25/20	E. - Written Discovery	confer w/CC AET, HMack re next steps in demands for class member data from OC	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	08/26/20	E. - Written Discovery	draft correspondence to OC re efforts to comply w/ROGs 5-6 and RPD 3	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	09/02/20	E. - Written Discovery	Confer in firm re status of discovery dispute	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/08/20	E. - Written Discovery	2d email request for discovery production update and proposal for tech experts to confer directly	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/09/20	E. - Written Discovery	confer w/CC AET re Def's ESI	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/21/20	E. - Written Discovery	review status of discovery, draft final demand for update on production of ESI to OC; assess discovery timeline for success at class certification stage	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	09/22/20	G. - Depositions	review, revise 30(b)(6) notice	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	09/23/20	G. - Depositions	revise 30(b)(6) notice; confer re same w/CC AET, MAC	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	09/24/20	G. - Depositions	confer w/CC re draft deposition notice; review, revise same; confer re service thereof	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	09/28/20	G. - Depositions	confer w/CC re noticed deposition	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	09/30/20	G. - Depositions	confer in firm w/JK re logistics for next week's deposition of defendant	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/01/20	G. - Depositions	confer w/CC AET, consultant JJ re upcoming deposition	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/02/20	G. - Depositions	prepare for 30(b)(6) deposition of Def	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	10/05/20	G. - Depositions	prepare for 30(b)(6) deposition of Def; confer w/AET, JJ re same	2.7	\$ 465.00	\$ 1,255.50
Jordan Sartell	10/06/20	G. - Depositions	review Def's objs to 30(b)(6) notice; confer w/CC AET, w/OC re same	0.9	\$ 465.00	\$ 418.50
Paralegal	10/06/20	G. - Depositions	Communications with internal staff, court reporter re: postponement of deposition.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	10/07/20	H. - Motion Practice	prepare LR 251 Discovery Dispute Motion; confer w/CC AET re same; finalize and file same	1.8	\$ 465.00	\$ 837.00
Paralegal	10/07/20	H. - Motion Practice	Confer in-firm re case strategy and next steps.	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	10/07/20	E. - Written Discovery	Confer in firm re case status and strategy	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/09/20	G. - Depositions	draft response to def's objs	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	10/09/20	G. - Depositions	r/r correspondence from OC re M&C; consent to present discovery dispute to USMJ	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	10/12/20	H. - Motion Practice	begin researching and drafting motion for sanctions; confer w/CC AET re same	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	10/12/20	G. - Depositions	M&C re 30(b)(6) deposition; production of ESI; confer w/CC AET re same	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	10/13/20	H. - Motion Practice	r/r email correspondence re Def's proposal for resolving 30(b)(6) dispute	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	10/13/20	H. - Motion Practice	r/r email correspondence re Def's contention that it is permitted to file a MSJ pursuant to a FN in the scheduling order	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/14/20	G. - Depositions	confer w/CC, OC re scheduling depositions, duration of same	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	10/15/20	G. - Depositions	confer w/OC re details of depo proposal	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/19/20	G. - Depositions	confer w/OC re scheduling deposition	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/20/20	G. - Depositions	confer w/OC re deposition dates vis a vis deadline to file joint discovery dispute statement	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	10/21/20	G. - Depositions	confer w/OC re deposition date; prep stip re same; finalize and file same	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	10/21/20	G. - Depositions	update and serve deposition notice per parties' stipulation; confer w/CC AET re same	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	10/26/20	G. - Depositions	begin drafting outline of MCC in prep for 30(b)(6) depo; review prior deposition exhibits, transcripts	4.1	\$ 465.00	\$ 1,906.50
Lauren Brennan	10/26/20	H. - Motion Practice	Confer with JMS re prep for MCC and 30b6 dep	0.4	\$ 465.00	\$ 186.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	10/27/20	G. - Depositions	begin drafting outline of MCC in prep for 30(b)(6) depo; review prior deposition exhibits, transcripts; confer w/CC AET re same	4.5	\$ 465.00	\$ 2,092.50
Paralegal	10/27/20	G. - Depositions	Researching advanced data standard developed by the UN 1267/1988 Security Council Committee	2.0	\$ 305.00	\$ 610.00
Jordan Sartell	10/28/20	G. - Depositions	confer in firm w/JK re deposition, exhibit sharing logistics	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	10/29/20	G. - Depositions	conduct 30(b)(6) deposition of defendant	6.0	\$ 465.00	\$ 2,790.00
Jordan Sartell	10/29/20	G. - Depositions	final prep for 30(b)(6) deposition; confer in firm w/JK re exhibits	2.0	\$ 465.00	\$ 930.00
Jordan Sartell	10/29/20	G. - Depositions	debrief 30(b)(6) deposition of defendant, next steps w/AET	0.4	\$ 465.00	\$ 186.00
Paralegal	10/30/20	G. - Depositions	Confer with JMS re exhibits to deposition; attend deposition; display exhibits in videoconference format; format and send exhibits to court reporter.	6.1	\$ 305.00	\$ 1,860.50
Jordan Sartell	10/30/20	E. - Written Discovery	prepare post-deposition correspondence re additional documents/ESI and update on court order compliance	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	11/06/20	E. - Written Discovery	r/r M&C correspondence from OC re 10/30 letter, deposition testimony	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	11/10/20	H. - Motion Practice	review Def's MSJ, exhibits in support of same; confer re same in firm w/JK, w/CC AET	1.5	\$ 465.00	\$ 697.50
Paralegal	11/10/20	H. - Motion Practice	Local rules research re: upcoming deadlines; confer with JMS re same; inquire with court reporter re: status of availability of depo transcript.	0.6	\$ 305.00	\$ 183.00
Jordan Sartell	11/13/20	H. - Motion Practice	confer in firm w/JK re review of def's depo transcript for numerosity information	0.3	\$ 465.00	\$ 139.50
Paralegal	11/16/20	H. - Motion Practice	Research on deposition testimony re: numerosity in preparation for class certification motion.	3.1	\$ 305.00	\$ 945.50
Jordan Sartell	11/16/20	H. - Motion Practice	confer in firm w/JK re review of testimony concerning discovery responses/numerosity	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	11/18/20	H. - Motion Practice	confer w/CC AET re MSJ response and opposition to expert declaration	0.2	\$ 465.00	\$ 93.00
James Francis	11/19/20	H. - Motion Practice	review Def SJ brief; draft response points	5.5	\$ 905.00	\$ 4,977.50
James Francis	11/22/20	H. - Motion Practice	draft, edit and revise MCC brief; meetings with JS re the same	7.5	\$ 905.00	\$ 6,787.50
Jordan Sartell	11/24/20	H. - Motion Practice	drafting MCC; preparing exhibits to same	2.3	\$ 465.00	\$ 1,069.50
Jordan Sartell	11/25/20	H. - Motion Practice	drafting MCC; preparing exhibits to same	5.1	\$ 465.00	\$ 2,371.50
Jordan Sartell	11/27/20	H. - Motion Practice	drafting MCC; preparing exhibits to same	5.4	\$ 465.00	\$ 2,511.00
James Francis	11/29/20	H. - Motion Practice	edit/revise OPP to SJ Motion	6.8	\$ 905.00	\$ 6,154.00
Jordan Sartell	11/30/20	H. - Motion Practice	finalize MCC, exhibits to same; confer in firm w/JS, w/CC AET re same; arrange for filing	9.2	\$ 465.00	\$ 4,278.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	11/30/20	H. - Motion Practice	Edit for formatting, add tables, finalize and file motion for class certification and associated motion to file under seal; arrange exhibits, sealed and unsealed; research local rules, draft motion to seal.	6.2	\$ 305.00	\$ 1,891.00
John Soumilas	11/30/20	H. - Motion Practice	review and revise motion to certify class	8.8	\$ 805.00	\$ 7,084.00
Jordan Sartell	11/30/20	H. - Motion Practice	research and begin drafting motion for discovery sanctions	1.7	\$ 465.00	\$ 790.50
Paralegal	12/01/20	H. - Motion Practice	Correspondence with co-counsel; relay under seal documents to judge's chambers and defense counsel; arrange for delivery of courtesy copies.	1.1	\$ 305.00	\$ 335.50
Jordan Sartell	12/01/20	H. - Motion Practice	continue drafting motion for discovery sanctions; confer in firm w/JS re same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	12/08/20	H. - Motion Practice	review recent ECF entries re MSJ, Motion to Strike, including court's order taking same under advisement; confer w/CC AET re same	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	12/09/20	H. - Motion Practice	Participated in attorney meeting discussing case strategy and status	0.2	\$ 465.00	\$ 93.00
Paralegal	12/09/20	C. - Pleadings and service	Confer in-firm re case strategy and next steps.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	12/10/20	H. - Motion Practice	continue drafting motion for discover sanctions	2.1	\$ 465.00	\$ 976.50
Jordan Sartell	12/16/20	H. - Motion Practice	continue drafting MoL iSo motion for sanctions, finding of numerosity, declaration in support of same	3.0	\$ 465.00	\$ 1,395.00
Jordan Sartell	12/20/20	H. - Motion Practice	continue drafting motion for sanctions, finding of numerosity	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	12/21/20	H. - Motion Practice	continue drafting motion for sanctions, finding of numerosity	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	12/21/20	H. - Motion Practice	review ECF 95, administratively denying MCC pending ruling on MSJ; confer w/JS re same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/05/21	H. - Motion Practice	review EFC 96, Order denying Def's MSJ	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	03/05/21	E. - Written Discovery	confer w/CC JAF, AET re compelled discovery in light of ruling on MSJ	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/08/21	E. - Written Discovery	review status of case, previous correspondence re compelled discovery (.4); draft correspondence to OC re outstanding compelled discovery (2.2)	2.6	\$ 465.00	\$ 1,209.00
Jordan Sartell	03/08/21	H. - Motion Practice	prepare plan for MCC briefing, conferral w/OC re schedule and discovery deficiencies (1.3); confer w/CC AET re same (.5)	1.8	\$ 465.00	\$ 837.00
Jordan Sartell	03/08/21	H. - Motion Practice	review, revise draft motion for discovery sanctions	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	03/08/21	H. - Motion Practice	review LR, ECF 95 re renoting MCC; confer in firm w/JK re same	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	03/10/21	H. - Motion Practice	Reviewed order denying MSJ; confer in firm re same and strategy going forward	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	03/10/21	H. - Motion Practice	prepare LR 251 Motion to Compel	0.4	\$ 465.00	\$ 186.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	03/10/21	E. - Written Discovery	Confer in-firm re discovery and case strategy.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	03/11/21	H. - Motion Practice	file motion to compel and for sanctions	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	03/12/21	H. - Motion Practice	f/u w/OC re M&C request per LR 251	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/16/21	H. - Motion Practice	confer w/client re MSJ ruling	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/17/21	H. - Motion Practice	add'l f/u email to OC re motion to compel	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/18/21	H. - Motion Practice	review response correspondence from OC re motion to compel (.3); M&C re same (.3); confer in firm w/AET re same (.3)	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	03/23/21	H. - Motion Practice	prepare draft JSR re production of compelled data, scheduling	1.3	\$ 465.00	\$ 604.50
Jordan Sartell	03/23/21	H. - Motion Practice	confer w/CC re draft JSR, scheduling	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	03/29/21	H. - Motion Practice	confer w/OC re draft status report	0.2	\$ 465.00	\$ 93.00
Paralegal	03/29/21	E. - Written Discovery	Confer in-firm re finalizing status report.	0.2	\$ 305.00	\$ 61.00
Paralegal	03/29/21	H. - Motion Practice	Confer in-firm re motion for leave to file SAC.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	03/30/21	H. - Motion Practice	confer w/OC re draft status report; finalize same for submission to USMJ	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	03/30/21	H. - Motion Practice	confer in firm w/JRK re notice of withdrawal of motion to compel; draft, oversee filing of same	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	03/31/21	D.- Disclosures and Rule 16 Conf.	Review ECF 100 re logistics for upcoming scheduling conference; respond to deputy as ordered	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/06/21	H. - Motion Practice	prep for status conference w/USMJ, debrief same w/CC AET	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	04/06/21	H. - Motion Practice	attend status conference w/USMJ, discuss outstanding discovery, proposed schedule	0.5	\$ 465.00	\$ 232.50
Lauren Brennan	04/07/21	E. - Written Discovery	Participated in attorney meeting discussing case status and strategy	0.2	\$ 465.00	\$ 93.00
Paralegal	04/07/21	H. - Motion Practice	Confer in-firm re motion for class cert.	0.2	\$ 305.00	\$ 61.00
Paralegal	04/07/21	E. - Written Discovery	Confer in-firm re discovery.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	04/08/21	H. - Motion Practice	review ECF 103, calendar MCC-related deadlines	0.2	\$ 465.00	\$ 93.00
Paralegal	04/08/21	A. - File Admin	Download and read Scheduling Order; analysis re: same	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	04/16/21	E. - Written Discovery	confer w/add'l counsel for Def Rachel Rodman	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	04/19/21	E. - Written Discovery	confer w/new Def counsel re status of discovery/case; debrief same w/CC AET	0.6	\$ 465.00	\$ 279.00
Lauren Brennan	04/19/21	H. - Motion Practice	Confer re case status and entry of new counsel	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	05/05/21	E. - Written Discovery	Participated in attorney meeting discussing case status and strategy	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	05/05/21	E. - Written Discovery	Confer in-firm re discovery and next steps.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	05/11/21	E. - Written Discovery	update client on status of production of compelled ESI from Def	0.2	\$ 465.00	\$ 93.00
Paralegal	06/03/21	E. - Written Discovery	Confer in-firm re upcoming production of class member data and next steps.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	06/14/21	E. - Written Discovery	confer w/OC re 6/16 deadline to produce compelled ESI	0.2	\$ 465.00	\$ 93.00
Paralegal	06/14/21	E. - Written Discovery	Confer in-firm re Def's upcoming doc prod on numerosity ESI.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	06/15/21	E. - Written Discovery	confer w/OC re production of ESI (.4); confer w/CC AET re same (.4)	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	06/17/21	E. - Written Discovery	review Def's production of compelled ESI (.6); confer in firm w/JAF, JS, CC AET re same (.2)	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	06/21/21	E. - Written Discovery	review compelled ESI	0.3	\$ 465.00	\$ 139.50
Paralegal	06/21/21	E. - Written Discovery	Confer in-firm re numerosity data.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	06/21/21	H. - Motion Practice	confer w/OC re extension of time to digest and present Ramirez v. TU decision	0.2	\$ 465.00	\$ 93.00
Paralegal	06/21/21	H. - Motion Practice	Confer in-firm re motion for time to file re-noticed motion for class cert.	0.2	\$ 305.00	\$ 61.00
Paralegal	06/22/21	H. - Motion Practice	Draft stipulation for extension of time regarding renewed class certification motion.	0.9	\$ 305.00	\$ 274.50
Jordan Sartell	06/22/21	H. - Motion Practice	add'l conferral w/OC re extension of deadlines in light of S.Ct. decision	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	06/22/21	H. - Motion Practice	revise draft motion for extension of MCC deadlines in light of S.Ct. decision	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	06/23/21	H. - Motion Practice	revise draft motion for extension of MCC deadlines in light of pending S.Ct. decision; confer in firm w/JK re same	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	06/24/21	H. - Motion Practice	finalize and oversee filing of motion for extension of MCC deadlines in light of pending S.Ct. decision	0.6	\$ 465.00	\$ 279.00
Paralegal	06/24/21	H. - Motion Practice	Format, finalize and file stipulation for extension of time regarding renewed class certification motion.	0.3	\$ 305.00	\$ 91.50
Jordan Sartell	06/25/21	H. - Motion Practice	review, revise MCC	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/28/21	H. - Motion Practice	review, analyze Supreme Court's decision in Ramirez v. TU; confer w/JS re same	0.9	\$ 465.00	\$ 418.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	06/28/21	F. - Settlement Talks and Conferences	discuss settlement strategy with J. Sartell; review and revise correspondence to D counsel re same	0.8	\$ 805.00	\$ 644.00
Jordan Sartell	06/28/21	F. - Settlement Talks and Conferences	confer w/OC re possibility of initiation of settlement discussions in light of Ramirez decision	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	06/28/21	E. - Written Discovery	review ESI	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	07/01/21	F. - Settlement Talks and Conferences	confer w/OC RR and JS re settlement potential and discuss logistics of same	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	07/01/21	H. - Motion Practice	confer w/JS re MCC strategy, evidentiary needs in post-Ramirez legal landscape	0.5	\$ 465.00	\$ 232.50
John Soumilas	07/01/21	F. - Settlement Talks and Conferences	review corresp re call with D counsel over settlement	0.4	\$ 805.00	\$ 322.00
John Soumilas	07/06/21	H. - Motion Practice	review initial filing of class cert briefing to date; review all exhibits and also compelled data re class members after initial filing; call with J. Sartell re renewed class cert briefing;	4.6	\$ 805.00	\$ 3,703.00
Jordan Sartell	07/06/21	E. - Written Discovery	review doc production re revised MCC	2.2	\$ 465.00	\$ 1,023.00
Paralegal	07/06/21	H. - Motion Practice	Exhibit data from doc prod	1.5	\$ 305.00	\$ 457.50
Jordan Sartell	07/06/21	H. - Motion Practice	confer w/JS re revised MCC	0.9	\$ 465.00	\$ 418.50
Paralegal	07/06/21	A. - File Admin	Analysis of latest scheduling order	0.3	\$ 305.00	\$ 91.50
Paralegal	07/06/21	H. - Motion Practice	discuss joining project: preparing/processing data for class cert	0.2	\$ 305.00	\$ 61.00
Paralegal	07/06/21	H. - Motion Practice	Confer in-firm re draft Motion for Class Cert.	0.2	\$ 305.00	\$ 61.00
Paralegal	07/07/21	H. - Motion Practice	Exhibit data from doc prod	7.0	\$ 305.00	\$ 2,135.00
Paralegal	07/07/21	H. - Motion Practice	Review documents to create exhibit for class certification motion	1.8	\$ 305.00	\$ 549.00
Jordan Sartell	07/07/21	E. - Written Discovery	review doc production re revised MCC; confer w/JRK, HMack re same	1.6	\$ 465.00	\$ 744.00
John Soumilas	07/07/21	H. - Motion Practice	correspondence with expert re affidavit in support of motion for class cert	1.1	\$ 805.00	\$ 885.50
Paralegal	07/08/21	H. - Motion Practice	Exhibit data from doc prod	7.0	\$ 305.00	\$ 2,135.00
Paralegal	07/08/21	H. - Motion Practice	Review documents to create exhibit for class certification motion	3.6	\$ 305.00	\$ 1,098.00
Jordan Sartell	07/08/21	E. - Written Discovery	review doc production re revised MCC; confer w/JRK, HMack re same	2.4	\$ 465.00	\$ 1,116.00
Paralegal	07/09/21	H. - Motion Practice	Exhibit data from doc prod	3.0	\$ 305.00	\$ 915.00
Paralegal	07/09/21	H. - Motion Practice	Review documents to create exhibit for class certification motion	2.9	\$ 305.00	\$ 884.50
John Soumilas	07/09/21	H. - Motion Practice	factual development re motion for class cert; meet re data to expert / summary witness;	2.2	\$ 805.00	\$ 1,771.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	07/09/21	E. - Written Discovery	confer w/JRK, HMack re review of reports produced by def	1.9	\$ 465.00	\$ 883.50
Jordan Sartell	07/09/21	H. - Motion Practice	confer w/JS re presentation of evidence for amended MCC	0.7	\$ 465.00	\$ 325.50
Paralegal	07/12/21	H. - Motion Practice	Exhibit data from doc prod	7.0	\$ 305.00	\$ 2,135.00
James Francis	07/12/21	H. - Motion Practice	review, edit and revise JS draft of motion for class certification	5.7	\$ 905.00	\$ 5,158.50
Paralegal	07/12/21	H. - Motion Practice	Review documents to create exhibit for class certification motion	4.8	\$ 305.00	\$ 1,464.00
Jordan Sartell	07/12/21	H. - Motion Practice	continue review of OFAC "Hits" in def's doc production; prepare MCC exhibit re same	3.8	\$ 465.00	\$ 1,767.00
Jordan Sartell	07/12/21	H. - Motion Practice	review, revise MCC w/Ramirez citations, add'l numerosity/ascertainability data	1.3	\$ 465.00	\$ 604.50
John Soumilas	07/13/21	H. - Motion Practice	review and revise motion for class cert; legal research; review status of expert / summary witness declaration.	8.8	\$ 805.00	\$ 7,084.00
Paralegal	07/13/21	H. - Motion Practice	Exhibit data from doc prod	6.0	\$ 305.00	\$ 1,830.00
Paralegal	07/13/21	H. - Motion Practice	Review documents to create exhibit for class certification motion	3.8	\$ 305.00	\$ 1,159.00
Jordan Sartell	07/13/21	H. - Motion Practice	continue review of OFAC "Hits" in def's doc production; prepare MCC exhibit re same	3.2	\$ 465.00	\$ 1,488.00
Jordan Sartell	07/13/21	H. - Motion Practice	review declaration of Duncan Levin (.8); confer w/JS re same (.8); confer w/DL re same (.4)	2.0	\$ 465.00	\$ 930.00
Jordan Sartell	07/13/21	H. - Motion Practice	review, revise revised MCC in conferral w/JS	1.1	\$ 465.00	\$ 511.50
Paralegal	07/13/21	H. - Motion Practice	Confer in-firm re revised motion for class cert.	0.2	\$ 305.00	\$ 61.00
John Soumilas	07/14/21	H. - Motion Practice	continue to prepare class cert motion	9.0	\$ 805.00	\$ 7,245.00
Paralegal	07/14/21	H. - Motion Practice	Exhibit data from doc prod - reviewing work & formatting; calls w/team re: same	8.0	\$ 305.00	\$ 2,440.00
Jordan Sartell	07/14/21	H. - Motion Practice	continue review of OFAC "Hits" in def's doc production; continue preparation of MCC exhibit re same	7.1	\$ 465.00	\$ 3,301.50
Jordan Sartell	07/14/21	H. - Motion Practice	review, revise MCC; finalize brief, exhibits, PO; supervise filing of same	5.3	\$ 465.00	\$ 2,464.50
Paralegal	07/14/21	H. - Motion Practice	Review, revise for formatting, edit, finalize and file renewed motion for class certification, including motion to file under seal.	4.3	\$ 305.00	\$ 1,311.50
James Francis	07/14/21	H. - Motion Practice	review/edit/revise renewed MCC	3.7	\$ 905.00	\$ 3,348.50
Paralegal	07/15/21	H. - Motion Practice	Follow-up on filing of class certification motion; delivery of under seal portions to opposing counsel, under seal documents and courtesy copies to judge's chambers	0.8	\$ 305.00	\$ 244.00
Paralegal	07/26/21	F. - Settlement Talks and Conferences	Confer in-firm re scheduling mediation.	0.2	\$ 305.00	\$ 61.00
Paralegal	07/26/21	H. - Motion Practice	Confer in-firm re draft reply iso motion for class cert.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	08/12/21	H. - Motion Practice	review Def's opposition to MCC	0.4	\$ 465.00	\$ 186.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	08/16/21	H. - Motion Practice	confer w/client re status of case, MCC briefing	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/17/21	H. - Motion Practice	review, annotate Def's oppo to MCC; review cited decisions	2.8	\$ 465.00	\$ 1,302.00
Jordan Sartell	08/17/21	H. - Motion Practice	drafting reply in support of MCC	2.3	\$ 465.00	\$ 1,069.50
Jordan Sartell	08/18/21	H. - Motion Practice	drafting reply in support of MCC	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	08/23/21	H. - Motion Practice	drafting reply in support of MCC	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	08/23/21	F. - Settlement Talks and Conferences	confer in firm w/JS re proposed mediators	0.2	\$ 465.00	\$ 93.00
Paralegal	08/23/21	F. - Settlement Talks and Conferences	Confer in-firm re mediation scheduling.	0.2	\$ 305.00	\$ 61.00
Paralegal	08/23/21	H. - Motion Practice	Confer in-firm re reply iso motion for class cert.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	08/24/21	H. - Motion Practice	drafting reply in support of MCC	6.4	\$ 465.00	\$ 2,976.00
John Soumilas	08/24/21	H. - Motion Practice	confer with J Sartell re reply in further support of class cert	1.1	\$ 805.00	\$ 885.50
John Soumilas	08/24/21	F. - Settlement Talks and Conferences	look of mediators; corresp with D counsel re possible mediation in later September or early October	0.9	\$ 805.00	\$ 724.50
Jordan Sartell	08/24/21	F. - Settlement Talks and Conferences	r/r correspondence among counsel re selection of mediator	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	08/25/21	H. - Motion Practice	drafting reply in support of MCC	1.8	\$ 465.00	\$ 837.00
Jordan Sartell	08/26/21	H. - Motion Practice	drafting reply in support of MCC	3.7	\$ 465.00	\$ 1,720.50
Paralegal	08/26/21	F. - Settlement Talks and Conferences	Emails w/ all counsel re scheduling mediation.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	08/27/21	H. - Motion Practice	drafting reply in support of MCC	2.2	\$ 465.00	\$ 1,023.00
Jordan Sartell	08/30/21	H. - Motion Practice	continue drafting reply in support of MCC	4.0	\$ 465.00	\$ 1,860.00
John Soumilas	08/30/21	F. - Settlement Talks and Conferences	corresp to and from D counsel and to Judge Cahill re mediation	0.7	\$ 805.00	\$ 563.50
John Soumilas	08/31/21	H. - Motion Practice	continue to prepare reply brief in further support of class cert	8.9	\$ 805.00	\$ 7,164.50
Jordan Sartell	08/31/21	H. - Motion Practice	continue drafting reply in support of MCC	5.7	\$ 465.00	\$ 2,650.50
John Soumilas	09/01/21	H. - Motion Practice	continue to prepare reply in further support of class cert	9.3	\$ 805.00	\$ 7,486.50
Jordan Sartell	09/01/21	H. - Motion Practice	continue review, revision of reply in support of MCC; finalize and supervise filing of same	7.5	\$ 465.00	\$ 3,487.50
Paralegal	09/01/21	H. - Motion Practice	Review, edit for formatting, add tables, finalize and file reply brief on class certification; communication re: courtesy copy to Judge Ishii's office.	3.4	\$ 305.00	\$ 1,037.00
James Francis	09/01/21	H. - Motion Practice	edit/revise reply brief re MCC	2.8	\$ 905.00	\$ 2,534.00
Paralegal	09/08/21	A. - File Admin	discussing case status w/atty	0.2	\$ 305.00	\$ 61.00
Paralegal	09/08/21	H. - Motion Practice	Confer in-firm re class cert motion and upcoming hearing re same.	0.2	\$ 305.00	\$ 61.00
Paralegal	09/08/21	F. - Settlement Talks and Conferences	Confer in-firm upcoming mediation.	0.2	\$ 305.00	\$ 61.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	09/08/21	A. - File Admin	Read email from mediator, add Zoom information to calendar item.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	09/13/21	F. - Settlement Talks and Conferences	drafting mediation brief	1.7	\$ 465.00	\$ 790.50
John Soumilas	09/13/21	H. - Motion Practice	review supp brief by D	1.1	\$ 805.00	\$ 885.50
Jordan Sartell	09/14/21	F. - Settlement Talks and Conferences	drafting mediation brief; periodically confer w/JS re same	5.9	\$ 465.00	\$ 2,743.50
John Soumilas	09/14/21	F. - Settlement Talks and Conferences	review correspondence and form from JAMS re mediation next week; prepare for mediation; review mediation submissions	4.2	\$ 805.00	\$ 3,381.00
Jordan Sartell	09/15/21	F. - Settlement Talks and Conferences	drafting mediation brief	5.9	\$ 465.00	\$ 2,743.50
John Soumilas	09/15/21	F. - Settlement Talks and Conferences	review and revise mediation memo	3.9	\$ 805.00	\$ 3,139.50
Paralegal	09/15/21	A. - File Admin	Download mediation instruction; analysis re: same	0.2	\$ 305.00	\$ 61.00
John Soumilas	09/16/21	F. - Settlement Talks and Conferences	revisions to mediation memo; call with J. Sartell; call with c-counsel; call with client' call with mediator.	8.0	\$ 805.00	\$ 6,440.00
Jordan Sartell	09/16/21	F. - Settlement Talks and Conferences	revise, finalize mediation brief	2.5	\$ 465.00	\$ 1,162.50
Jordan Sartell	09/16/21	F. - Settlement Talks and Conferences	confer in firm w/JS, w/CC re upcoming mediation	2.2	\$ 465.00	\$ 1,023.00
Lauren Brennan	09/16/21	F. - Settlement Talks and Conferences	Reviewed mediation statement; confer with JMS re comparable settlements	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	09/16/21	F. - Settlement Talks and Conferences	participate in pre-mediation call w/co-counsel, opposing counsel, mediator	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	09/17/21	F. - Settlement Talks and Conferences	review lodestar, costs figures in advance of mediation	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	09/17/21	F. - Settlement Talks and Conferences	confer w/client re upcoming mediation, settlement authority	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	09/20/21	F. - Settlement Talks and Conferences	continue preparation for tomorrow's mediation	2.1	\$ 465.00	\$ 976.50
John Soumilas	09/20/21	F. - Settlement Talks and Conferences	call with J. Sartell re client; fees, costs, etc. Prep re mediation	0.7	\$ 805.00	\$ 563.50
Jordan Sartell	09/20/21	H. - Motion Practice	confer in firm w/JRK re logistics for 9/27 MCC hearing	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/21/21	F. - Settlement Talks and Conferences	prepare for, attend mediation w/Wm. Cahill	10.0	\$ 465.00	\$ 4,650.00
John Soumilas	09/21/21	F. - Settlement Talks and Conferences	prepare for and attend mediation with Judge Cahill	10.0	\$ 805.00	\$ 8,050.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	09/22/21	E. - Written Discovery	debrief mediation session w/client; confer re recently discovered add'l OFAC hit from 2019; confer in firm w/JS re same	0.8	\$ 465.00	\$ 372.00
Lauren Brennan	10/06/21	H. - Motion Practice	Participated in attorney meeting discussing case strategy and status	0.2	\$ 465.00	\$ 93.00
Paralegal	10/06/21	A. - File Admin	discuss case strategy and status w/team	0.2	\$ 305.00	\$ 61.00
Paralegal	11/11/21	H. - Motion Practice	Confer in-firm re briefing and case strategy.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	01/03/22	H. - Motion Practice	confer w/client re case status, pending MCC	0.2	\$ 465.00	\$ 93.00
Lauren Brennan	01/18/22	H. - Motion Practice	Participated in attorney meeting discussing case status and strategy	0.2	\$ 465.00	\$ 93.00
John Soumilas	03/04/22	H. - Motion Practice	Review emails regarding class certification decision, review opinion.	3.2	\$ 805.00	\$ 2,576.00
Jordan Sartell	03/04/22	H. - Motion Practice	review ECF 121, order certifying class, and related email correspondence among counsel	1.4	\$ 465.00	\$ 651.00
Lauren Brennan	03/04/22	H. - Motion Practice	Reviewed MCC order; confer in firm re same	0.4	\$ 465.00	\$ 186.00
John Soumilas	03/05/22	H. - Motion Practice	careful review of court's certification order; outline plan for next steps through trial	4.8	\$ 805.00	\$ 3,864.00
James Francis	03/07/22	H. - Motion Practice	review court's opinion certifying class; discuss next steps with JS	2.3	\$ 905.00	\$ 2,081.50
John Soumilas	03/07/22	H. - Motion Practice	Review email correspondence re class size, class issues.	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	03/10/22	E. - Written Discovery	review class membership figures, supporting data; correspondence among counsel re same	3.5	\$ 465.00	\$ 1,627.50
Paralegal	03/10/22	I. - Class Action Notices and Admin.	reading class cert doc; class member outreach brainstorm/Qs; draft letter doc problem solving - mail merge & formatting issues	1.2	\$ 305.00	\$ 366.00
Paralegal	03/10/22	I. - Class Action Notices and Admin.	planning meeting w/JMS re outreach to class members - letter contents, goals, next steps	0.7	\$ 305.00	\$ 213.50
John Soumilas	03/10/22	H. - Motion Practice	Review email correspondence re class issues.	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	03/11/22	E. - Written Discovery	continue analysis of class ESI	1.6	\$ 465.00	\$ 744.00
Paralegal	03/14/22	I. - Class Action Notices and Admin.	email abt bid to ALCS for class member outreach	0.4	\$ 305.00	\$ 122.00
Paralegal	03/15/22	I. - Class Action Notices and Admin.	update draft letter to class members	0.9	\$ 305.00	\$ 274.50
Paralegal	03/15/22	I. - Class Action Notices and Admin.	email abt bid to ALCS for class member outreach	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	03/16/22	I. - Class Action Notices and Admin.	continue analysis of report data vis a vis assembly of class list	0.9	\$ 465.00	\$ 418.50
Paralegal	03/16/22	I. - Class Action Notices and Admin.	review ALCS proposal, share w/JMS	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	03/18/22	I. - Class Action Notices and Admin.	review class member documents	1.1	\$ 465.00	\$ 511.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	03/18/22	H. - Motion Practice	confer w/class rep re class certification decision and next steps in litigation	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/21/22	I. - Class Action Notices and Admin.	draft correspondence to OC re preparation of class list, add'l documents to be produced	0.9	\$ 465.00	\$ 418.50
Lauren Brennan	03/22/22	H. - Motion Practice	Confer re next steps following cert	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	03/23/22	I. - Class Action Notices and Admin.	finalize correspondence, spreadsheet re class list to OC (2.1); confer w/CC AET re same (.3)	2.4	\$ 465.00	\$ 1,116.00
John Soumilas	03/23/22	I. - Class Action Notices and Admin.	review corresp re complete class list and notice; call with admin re pricing	1.6	\$ 805.00	\$ 1,288.00
John Soumilas	03/23/22	F. - Settlement Talks and Conferences	Review correspondence regarding class size issue.	0.4	\$ 805.00	\$ 322.00
Paralegal	03/24/22	I. - Class Action Notices and Admin.	notice bid discussion w/JMS	0.2	\$ 305.00	\$ 61.00
John Soumilas	03/28/22	F. - Settlement Talks and Conferences	Review correspondence regarding class size, class list.	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/29/22	F. - Settlement Talks and Conferences	Review email correspondence re: class size issue, class list.	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/01/22	H. - Motion Practice	Review Westlaw-published version of class certification decision.	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/04/22	F. - Settlement Talks and Conferences	Review correspondence regarding class size and class list.	0.8	\$ 805.00	\$ 644.00
John Soumilas	04/04/22	I. - Class Action Notices and Admin.	follow up with D counsel re class list/ need for notice	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	04/04/22	E. - Written Discovery	confer w/OC re discovery supplementation, class list prep	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	04/05/22	E. - Written Discovery	confer w/OC re discovery supplementation, class list prep; confirming correspondence re same	0.5	\$ 465.00	\$ 232.50
John Soumilas	04/05/22	F. - Settlement Talks and Conferences	Review email correspondence re class size, class list.	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/06/22	I. - Class Action Notices and Admin.	correspondence re class list and class notice	0.6	\$ 805.00	\$ 483.00
Jordan Sartell	04/11/22	I. - Class Action Notices and Admin.	confer w/OC TS re discrepancies between GUIDs among class members, identification of same, preparation of class list	0.2	\$ 465.00	\$ 93.00
Paralegal	04/18/22	I. - Class Action Notices and Admin.	check in w/JMS re outreach planning	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	04/20/22	I. - Class Action Notices and Admin.	f/u w/OC re status of preparation of class list, production of class members' reports	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	04/20/22	F. - Settlement Talks and Conferences	Review email correspondence	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/28/22	I. - Class Action Notices and Admin.	confer w/OC re status of preparing class list, producing additional class member documents; confer in firm re same	0.3	\$ 465.00	\$ 139.50
John Soumilas	04/28/22	F. - Settlement Talks and Conferences	Review email correspondence	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/22	F. - Settlement Talks and Conferences	Review email correspondence	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/02/22	I. - Class Action Notices and Admin.	r/r correspondence from OC re status of class list preparation, supp'l production of class member documents	0.4	\$ 465.00	\$ 186.00
John Soumilas	05/02/22	F. - Settlement Talks and Conferences	Review email correspondence re class size issue	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/09/22	I. - Class Action Notices and Admin.	draft f/u correspondence to OC re delays in preparation of class list	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	05/09/22	I. - Class Action Notices and Admin.	confer in firm w/JS re potential motion to compel class member docs	0.2	\$ 465.00	\$ 93.00
John Soumilas	05/09/22	F. - Settlement Talks and Conferences	Review email correspondence	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/11/22	F. - Settlement Talks and Conferences	Review email correspondence	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/12/22	E. - Written Discovery	additional conferral w/OC re class list and document supplementation delays, timeline	0.8	\$ 465.00	\$ 372.00
John Soumilas	05/12/22	F. - Settlement Talks and Conferences	Review email correspondence	0.2	\$ 805.00	\$ 161.00
Paralegal	05/17/22	H. - Motion Practice	discuss case progress w/team	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	05/17/22	H. - Motion Practice	Participated in attorney meeting discussing case status and strategy	0.2	\$ 465.00	\$ 93.00
Paralegal	05/17/22	D.- Disclosures and Rule 16 Conf.	Confer in-firm re upcoming status conference.	0.2	\$ 305.00	\$ 61.00
John Soumilas	06/15/22	F. - Settlement Talks and Conferences	letter and class to class action admins re notice, etc. review data relative to bids	2.6	\$ 805.00	\$ 2,093.00
Paralegal	06/21/22	A. - File Admin	discussing case status w/atty	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	06/21/22	I. - Class Action Notices and Admin.	Participated in attorney meeting discussing case status and strategy	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	06/24/22	I. - Class Action Notices and Admin.	obtain, begin review of additional class member data, consumer reports; confer w/data consultant re same	2.6	\$ 465.00	\$ 1,209.00
John Soumilas	06/24/22	I. - Class Action Notices and Admin.	meeting re class notice and admin; review docs to ID class; notes for expert	2.1	\$ 805.00	\$ 1,690.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	06/24/22	E. - Written Discovery	Assist with download of document production; upload same to firm's cloud; confer with JMS re: same.	0.9	\$ 305.00	\$ 274.50
Jordan Sartell	06/24/22	I. - Class Action Notices and Admin.	confer w/consultant JJ re extraction of class member data from produced reports to prepare class list	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	06/27/22	I. - Class Action Notices and Admin.	prepare for meeting w/data consultant re extracting relevant information from html reports prepared about class members (.4); confer w/consultant re preparation of class list (.7)	1.1	\$ 465.00	\$ 511.50
Jordan Sartell	06/27/22	D.- Disclosures and Rule 16 Conf.	confer w/CC AET re notice, scheduling proposals for 2d phase of case	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	07/05/22	I. - Class Action Notices and Admin.	review data consultant export of class member information (.4); confer w/consultant re same (1)	1.4	\$ 465.00	\$ 651.00
John Soumilas	07/08/22	H. - Motion Practice	Review proposed joint status report, review email correspondence.	1.0	\$ 805.00	\$ 805.00
Paralegal	07/08/22	D.- Disclosures and Rule 16 Conf.	confer w/co-counsel re joint status report, notice, scheduling order	0.9	\$ 305.00	\$ 274.50
Jordan Sartell	07/08/22	D.- Disclosures and Rule 16 Conf.	confer w/co-counsel re merits discovery, scheduling proposal	1.0	\$ 465.00	\$ 465.00
John Soumilas	07/11/22	H. - Motion Practice	Review revisions to proposed joint status report.	0.8	\$ 805.00	\$ 644.00
John Soumilas	07/11/22	D.- Disclosures and Rule 16 Conf.	corersp re next phase of case, cmc	0.4	\$ 805.00	\$ 322.00
John Soumilas	07/12/22	F. - Settlement Talks and Conferences	Review email correspondence re: joint status report, notice plan proposals.	0.8	\$ 805.00	\$ 644.00
Jordan Sartell	07/12/22	D.- Disclosures and Rule 16 Conf.	confer w/CC re draft merits scheduling report, notice plan	0.5	\$ 465.00	\$ 232.50
Paralegal	07/12/22	D.- Disclosures and Rule 16 Conf.	review cocounsel draft joint status report and proposed scheduling order, getting notice potential vendor info and soliciting proposal	0.4	\$ 305.00	\$ 122.00
John Soumilas	07/13/22	H. - Motion Practice	Review email correspondence, including proposed joint status report in wake of class certification opinion.	1.2	\$ 805.00	\$ 966.00
Jordan Sartell	07/13/22	D.- Disclosures and Rule 16 Conf.	review, revise plaintiff's position statement re scheduling proposal	0.9	\$ 465.00	\$ 418.50
Paralegal	07/13/22	D.- Disclosures and Rule 16 Conf.	soliciting bids for notice program, work w/JMS to update joint status report draft	0.9	\$ 305.00	\$ 274.50
John Soumilas	07/14/22	H. - Motion Practice	Review email correspondence re: status report	4.4	\$ 805.00	\$ 3,542.00
Jordan Sartell	07/14/22	D.- Disclosures and Rule 16 Conf.	review, respond to def's revised scheduling proposal	1.6	\$ 465.00	\$ 744.00
John Soumilas	07/14/22	D.- Disclosures and Rule 16 Conf.	corresp re 26(f), merits discovery, next CMC	0.9	\$ 805.00	\$ 724.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	07/14/22	D.- Disclosures and Rule 16 Conf.	check in w/JMS abt joint status report	0.2	\$ 305.00	\$ 61.00
Paralegal	07/15/22	D.- Disclosures and Rule 16 Conf.	review bid for notice mailing, share w/cocounsel	0.6	\$ 305.00	\$ 183.00
John Soumilas	07/18/22	D.- Disclosures and Rule 16 Conf.	Review of email traffic regarding changed date/time of status conference.	3.0	\$ 805.00	\$ 2,415.00
John Soumilas	07/18/22	D.- Disclosures and Rule 16 Conf.	corresp re CMC; prep	1.2	\$ 805.00	\$ 966.00
Jordan Sartell	07/18/22	D.- Disclosures and Rule 16 Conf.	confer w/CC re appearances at rescheduled scheduling conference (.3); confer w/court staff re same (.2)	0.5	\$ 465.00	\$ 232.50
Paralegal	07/19/22	E. - Written Discovery	Confer in-firm re merits discovery, d's request for add'l discovery and next steps.	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	07/19/22	D.- Disclosures and Rule 16 Conf.	confer in firm w/JS, JAF re upcoming scheduling conference, Def's extreme request for add'l discovery	0.4	\$ 465.00	\$ 186.00
Paralegal	07/19/22	A. - File Admin	discussing case status w/atty	0.4	\$ 305.00	\$ 122.00
Lauren Brennan	07/19/22	E. - Written Discovery	Participated in attorney meeting discussing case status, class administration, and merits discovery	0.4	\$ 465.00	\$ 186.00
Paralegal	07/19/22	A. - File Admin	discussing case status w/atty	0.4	\$ 305.00	\$ 122.00
Paralegal	07/19/22	D.- Disclosures and Rule 16 Conf.	Confer in-firm re upcoming status conference re further scheduling dates.	0.2	\$ 305.00	\$ 61.00
James Francis	07/20/22	E. - Written Discovery	prepare for hearing/scheduling conference	1.3	\$ 905.00	\$ 1,176.50
John Soumilas	07/21/22	D.- Disclosures and Rule 16 Conf.	review report and prep for CMC; review merits discovery plan; call with J. Sartell; corresp among co-counsel	1.7	\$ 805.00	\$ 1,368.50
Jordan Sartell	07/21/22	D.- Disclosures and Rule 16 Conf.	prepare for scheduling conference w/JAF (.9); attend scheduling conference on behalf of plaintiff (.3)	1.2	\$ 465.00	\$ 558.00
James Francis	07/21/22	E. - Written Discovery	attend hearing/scheduling conference; talk with Jordan before	1.2	\$ 905.00	\$ 1,086.00
John Soumilas	07/21/22	D.- Disclosures and Rule 16 Conf.	Review emails regarding case management conference	0.4	\$ 805.00	\$ 322.00
John Soumilas	07/22/22	D.- Disclosures and Rule 16 Conf.	Review email correspondence	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	07/25/22	D.- Disclosures and Rule 16 Conf.	review court's scheduling order, ECF 125	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	07/28/22	I. - Class Action Notices and Admin.	confer in firm w/HMac re class notice/admin bids	0.2	\$ 465.00	\$ 93.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	08/01/22	I. - Class Action Notices and Admin.	discuss next steps w/JMS - reviewing class list data, understanding issues, preparing notice materials	1.0	\$ 305.00	\$ 305.00
Paralegal	08/01/22	I. - Class Action Notices and Admin.	line by line compare notice admin bids	1.0	\$ 305.00	\$ 305.00
Jordan Sartell	08/01/22	I. - Class Action Notices and Admin.	confer w/HMac re preparation of notice materials, class list cleansing, review of underlying def docs	0.8	\$ 465.00	\$ 372.00
Paralegal	08/01/22	I. - Class Action Notices and Admin.	discussion w/F Barkan abt class notice, how to reach folks	0.5	\$ 305.00	\$ 152.50
Jordan Sartell	08/01/22	I. - Class Action Notices and Admin.	confer w/potential admin re notice project	0.4	\$ 465.00	\$ 186.00
Paralegal	08/02/22	I. - Class Action Notices and Admin.	line by line notice bid comparisons	2.0	\$ 305.00	\$ 610.00
Paralegal	08/08/22	I. - Class Action Notices and Admin.	draft long form notice	1.0	\$ 305.00	\$ 305.00
Paralegal	08/09/22	I. - Class Action Notices and Admin.	draft long form notice	1.0	\$ 305.00	\$ 305.00
Paralegal	08/10/22	E. - Written Discovery	review Jaffe's parsing work: understanding errors, results, outstanding Qs	4.0	\$ 305.00	\$ 1,220.00
Paralegal	08/11/22	I. - Class Action Notices and Admin.	discuss class list and parsing issues w/JMS, email to expert re same, SSN spot checking	2.4	\$ 305.00	\$ 732.00
Paralegal	08/11/22	I. - Class Action Notices and Admin.	draft long form notice	1.5	\$ 305.00	\$ 457.50
Jordan Sartell	08/11/22	I. - Class Action Notices and Admin.	confer in firm w/HMac re drafting class notice materials, finalization of class list	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	08/11/22	E. - Written Discovery	confer w/client re recent scheduling conference, remaining discovery	0.2	\$ 465.00	\$ 93.00
Paralegal	08/12/22	I. - Class Action Notices and Admin.	discuss class list and parsing issues w/JJaffe, review updated spreadsheets	0.5	\$ 305.00	\$ 152.50
Paralegal	08/19/22	I. - Class Action Notices and Admin.	review notice plan draft, id changes	2.0	\$ 305.00	\$ 610.00
Paralegal	08/19/22	I. - Class Action Notices and Admin.	discussing notice plan progress w/JMS	0.2	\$ 305.00	\$ 61.00
Paralegal	08/22/22	I. - Class Action Notices and Admin.	long form notice draft	5.5	\$ 305.00	\$ 1,677.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	08/23/22	I. - Class Action Notices and Admin.	prepping docs for settlement admin - incl protective order, creating spreadsheet sample, creating class list and assessing what data needs to be supplemented w/review of production; start gathering missing data	5.0	\$ 305.00	\$ 1,525.00
Jordan Sartell	08/24/22	I. - Class Action Notices and Admin.	review, revise draft class notice materials (1.8); confer w/CC re same (.4)	2.2	\$ 465.00	\$ 1,023.00
Paralegal	08/24/22	I. - Class Action Notices and Admin.	check in w/JMS re notice draft; determine # members in each class	0.5	\$ 305.00	\$ 152.50
John Soumilas	08/24/22	I. - Class Action Notices and Admin.	Review email re: proposal from potential settlement administrator	0.4	\$ 805.00	\$ 322.00
John Soumilas	08/25/22	I. - Class Action Notices and Admin.	Review emails re class notice issues.	1.2	\$ 805.00	\$ 966.00
Paralegal	08/25/22	I. - Class Action Notices and Admin.	SA comms, notice prep	1.0	\$ 305.00	\$ 305.00
Jordan Sartell	08/25/22	I. - Class Action Notices and Admin.	confer w/potential notice administrator CDL re competitiveness of bid	0.3	\$ 465.00	\$ 139.50
Paralegal	08/26/22	I. - Class Action Notices and Admin.	SA comms, notice prep	1.0	\$ 305.00	\$ 305.00
John Soumilas	08/26/22	I. - Class Action Notices and Admin.	Review email correspondence re potential settlement administrator	0.4	\$ 805.00	\$ 322.00
Paralegal	08/29/22	I. - Class Action Notices and Admin.	SA comms, notice prep	6.0	\$ 305.00	\$ 1,830.00
Paralegal	08/29/22	I. - Class Action Notices and Admin.	review, revise, and finalize class notice materials; confer in firm w/JMS re same; provide notice materials, class list to vendor	2.2	\$ 305.00	\$ 671.00
Jordan Sartell	08/29/22	I. - Class Action Notices and Admin.	review, revise, and finalize class notice materials; confer in firm w/HMac re same; provide notice materials, class list to vendor	1.1	\$ 465.00	\$ 511.50
John Soumilas	08/29/22	I. - Class Action Notices and Admin.	Review email correspondence with potential settlement administrator.	0.6	\$ 805.00	\$ 483.00
Paralegal	08/30/22	I. - Class Action Notices and Admin.	SA comms, notice prep, data cleaning	4.0	\$ 305.00	\$ 1,220.00
John Soumilas	08/30/22	I. - Class Action Notices and Admin.	Review email correspondence re: notice	0.4	\$ 805.00	\$ 322.00
Paralegal	08/31/22	I. - Class Action Notices and Admin.	SA comms, notice prep, data cleaning	4.0	\$ 305.00	\$ 1,220.00
Paralegal	08/31/22	I. - Class Action Notices and Admin.	review, revise draft class notice; confer w/notice admin, JMS re same	1.9	\$ 305.00	\$ 579.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	08/31/22	I. - Class Action Notices and Admin.	review, revise draft class notice; confer w/notice admin, HMac re same	1.7	\$ 465.00	\$ 790.50
Paralegal	09/01/22	I. - Class Action Notices and Admin.	SA comms, notice prep, data cleaning - finding emails	3.0	\$ 305.00	\$ 915.00
Paralegal	09/01/22	I. - Class Action Notices and Admin.	review draft notice materials, confer w/notice admin, JMS re same	0.5	\$ 305.00	\$ 152.50
Jordan Sartell	09/01/22	I. - Class Action Notices and Admin.	review draft notice materials, confer w/notice admin, HMac re same	0.4	\$ 465.00	\$ 186.00
Paralegal	09/06/22	I. - Class Action Notices and Admin.	SA comms, notice prep - review work done by SA & replace companies with appropriate class member names	4.0	\$ 305.00	\$ 1,220.00
Jordan Sartell	09/06/22	E. - Written Discovery	review Def's R 45 subpoena, related calendar items	0.3	\$ 465.00	\$ 139.50
Paralegal	09/06/22	E. - Written Discovery	discuss case progress w/team - class member discovery, cost	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	09/06/22	E. - Written Discovery	Participated in attorney meeting regarding case status and strategy	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/07/22	I. - Class Action Notices and Admin.	confer w/JS, notice admin re status of notice prep	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	09/08/22	E. - Written Discovery	review correspondence among counsel re discovery from individual class members, settlement	0.2	\$ 465.00	\$ 93.00
Paralegal	09/13/22	I. - Class Action Notices and Admin.	SA comms, notice prep - webpage review, internal discussion w/JMS	3.0	\$ 305.00	\$ 915.00
Paralegal	09/13/22	I. - Class Action Notices and Admin.	review notice website, comms w/admin re same; request inbox set up	1.2	\$ 305.00	\$ 366.00
Jordan Sartell	09/13/22	I. - Class Action Notices and Admin.	review draft notice website, materials; confer w/notice admin re same	0.8	\$ 465.00	\$ 372.00
Paralegal	09/13/22	I. - Class Action Notices and Admin.	discuss class data w/JS, JMS; preliminary plan for outreach	0.5	\$ 305.00	\$ 152.50
Paralegal	09/14/22	I. - Class Action Notices and Admin.	discuss notice plan, class data, engagement agreement w/JS, JMS; admin - setting up email, comms w/admin	0.9	\$ 305.00	\$ 274.50
Jordan Sartell	09/15/22	E. - Written Discovery	confer w/OC re class notice, 3d party subpoenas, absent class member discovery, settlement (.6); confer w/CC AET re same (.2)	0.8	\$ 465.00	\$ 372.00
Paralegal	09/16/22	I. - Class Action Notices and Admin.	review class data - analyze good jurisdictions, SOL divide	2.2	\$ 305.00	\$ 671.00
Paralegal	09/19/22	I. - Class Action Notices and Admin.	review class data - analyze good jurisdictions, SOL divide	2.2	\$ 305.00	\$ 671.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Paralegal	09/19/22	I. - Class Action Notices and Admin.	draft & send firm wide summary of notice, solicit JMS feedback	1.5	\$ 305.00	\$ 457.50
Paralegal	09/19/22	I. - Class Action Notices and Admin.	dealing w/inbox error, comms /JMS, SA re same	0.7	\$ 305.00	\$ 213.50
Paralegal	09/19/22	I. - Class Action Notices and Admin.	confer in firm w/JS, JMS re notice to class members, outreach re potential trial, MSJ witnesses	0.5	\$ 305.00	\$ 152.50
Jordan Sartell	09/19/22	I. - Class Action Notices and Admin.	confer in firm w/JS, HMac re notice to class members, outreach re potential trial, MSJ witnesses	0.4	\$ 465.00	\$ 186.00
Paralegal	09/20/22	I. - Class Action Notices and Admin.	dealing w/inbox error, comms /JMS, SA re same	0.7	\$ 305.00	\$ 213.50
Lauren Brennan	09/20/22	I. - Class Action Notices and Admin.	Correspondence re class member contacts	0.2	\$ 465.00	\$ 93.00
Paralegal	09/21/22	I. - Class Action Notices and Admin.	work w/CROth to set up an in-CRM class member tracking process	2.0	\$ 305.00	\$ 610.00
Paralegal	09/21/22	I. - Class Action Notices and Admin.	edit OFAC template landing page	1.0	\$ 305.00	\$ 305.00
Paralegal	09/22/22	I. - Class Action Notices and Admin.	work w/CROth to set up an in-CRM class member tracking process	2.2	\$ 305.00	\$ 671.00
Paralegal	09/23/22	I. - Class Action Notices and Admin.	edit OFAC template landing page	3.0	\$ 305.00	\$ 915.00
Jordan Sartell	09/26/22	G. - Depositions	confer w/CC AET, OC RR re first 3d party depo noticed for 9/30	0.3	\$ 465.00	\$ 139.50
Paralegal	09/27/22	I. - Class Action Notices and Admin.	work w/CROth to set up an in-CRM class member tracking process	2.0	\$ 305.00	\$ 610.00
Jordan Sartell	09/27/22	G. - Depositions	confer w/CC AET, OC RR re first 3d party depo noticed for 9/30; revise inventory of 3d party subpoenas	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	09/27/22	I. - Class Action Notices and Admin.	confer in firm w/HMac re status of class notice, general outreach to class members, online landing page	0.2	\$ 465.00	\$ 93.00
Paralegal	09/27/22	I. - Class Action Notices and Admin.	confer in firm w/JMS re status of class notice, general outreach to class members, online landing page	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	09/28/22	I. - Class Action Notices and Admin.	confer in firm w/HMac re outreach to class members	0.5	\$ 465.00	\$ 232.50
Paralegal	09/28/22	I. - Class Action Notices and Admin.	Assistance on translation for Class Member notification	0.5	\$ 305.00	\$ 152.50
Paralegal	09/28/22	I. - Class Action Notices and Admin.	confer in firm w/JMS re outreach to class members	0.5	\$ 305.00	\$ 152.50
Paralegal	09/28/22	I. - Class Action Notices and Admin.	work w/CROth to set up an in-CRM class member tracking process, notify firm	0.5	\$ 305.00	\$ 152.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Lauren Brennan	09/28/22	I. - Class Action Notices and Admin.	Correspondence re class member contact	0.2	\$ 465.00	\$ 93.00
Paralegal	09/29/22	I. - Class Action Notices and Admin.	targeted outreach mailing - printing mail merge, labels, & letter stuffing, drop off @USPS	6.0	\$ 305.00	\$ 1,830.00
Paralegal	09/30/22	I. - Class Action Notices and Admin.	fixing chat window error in landing page, troubleshooting	4.5	\$ 305.00	\$ 1,372.50
Lauren Brennan	10/03/22	E. - Written Discovery	Participated in attorney meeting discussing case status and strategy	0.4	\$ 465.00	\$ 186.00
James Francis	10/04/22	H. - Motion Practice	zoom meeting with ca team re next steps, 3rd party discovery	0.8	\$ 905.00	\$ 724.00
Paralegal	10/04/22	E. - Written Discovery	Confer in-firm re next steps and additional discovery.	0.5	\$ 305.00	\$ 152.50
Paralegal	10/04/22	E. - Written Discovery	team check in re disc. & deps	0.2	\$ 305.00	\$ 61.00
Paralegal	10/04/22	I. - Class Action Notices and Admin.	Confer in-firm re class notice.	0.2	\$ 305.00	\$ 61.00
Jordan Sartell	10/10/22	E. - Written Discovery	review doc & depo subpoena to Norm Reeves parent organization Conant Auto Retail Group; confer in firm, w/CC re same	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	10/10/22	E. - Written Discovery	review add'l subpoena from Def, note dates and docs requested	0.2	\$ 465.00	\$ 93.00
James Francis	10/14/22	H. - Motion Practice	review motion for limited discovery of absent class members/3rd party subpoenas	1.3	\$ 905.00	\$ 1,176.50
Jordan Sartell	10/14/22	H. - Motion Practice	review def's motion for class member discovery; confer w/CC AET re same	0.3	\$ 465.00	\$ 139.50
Jordan Sartell	10/14/22	G. - Depositions	confer w/OC re status of deposition notice, doc requests to Crowley Car Company	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	10/14/22	E. - Written Discovery	confer w/OC re doc production from McGovern Auto Sales; begin review of same	0.2	\$ 465.00	\$ 93.00
Paralegal	10/17/22	H. - Motion Practice	Research local rules, determine timing of required response to discovery motion filed by CBC; confer with JMS re same.	1.4	\$ 305.00	\$ 427.00
Jordan Sartell	10/17/22	E. - Written Discovery	confer w/CC re subjects for subpoena to 3d party car dealerships (.2); draft same	0.2	\$ 465.00	\$ 93.00
Paralegal	10/19/22	I. - Class Action Notices and Admin.	class member call, discuss class member Qs w/JMS	0.4	\$ 305.00	\$ 122.00
Jordan Sartell	10/20/22	H. - Motion Practice	review Def's position statement re absent class member discovery; begin drafting Pl's statement re same	1.2	\$ 465.00	\$ 558.00
Paralegal	10/20/22	I. - Class Action Notices and Admin.	class member emails	0.5	\$ 305.00	\$ 152.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	10/21/22	H. - Motion Practice	drafting PI's statement re absent class member discovery	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	10/23/22	H. - Motion Practice	drafting PI's statement re absent class member discovery	4.7	\$ 465.00	\$ 2,185.50
Jordan Sartell	10/24/22	H. - Motion Practice	drafting PI's statement re absent class member discovery	4.4	\$ 465.00	\$ 2,046.00
Jordan Sartell	10/25/22	H. - Motion Practice	drafting PI's statement re absent class member discovery (.4); confer w/CC AET re same (.2)	0.6	\$ 465.00	\$ 279.00
James Francis	10/26/22	H. - Motion Practice	draft, edit and revise section of Joint statement on discovery dispute re 3rd parties;	3.2	\$ 905.00	\$ 2,896.00
Jordan Sartell	10/26/22	H. - Motion Practice	finalizing PI's statement re absent class member discovery	2.6	\$ 465.00	\$ 1,209.00
James Francis	11/01/22	D.- Disclosures and Rule 16 Conf.	draft and edit Joint Status Report	1.3	\$ 905.00	\$ 1,176.50
Jordan Sartell	11/01/22	F. - Settlement Talks and Conferences	confer in firm w/JAF, w/CC AET re Def's motion for class member discovery, joint statement re same, availability for settlement conference per ECF 125 (.6); confer w/OC re same (.4)	1.0	\$ 465.00	\$ 465.00
Jordan Sartell	11/01/22	F. - Settlement Talks and Conferences	draft statement re status of settlement, availability for settlement conference per ECF 125; confer among counsel re same; prep for filing	0.8	\$ 465.00	\$ 372.00
Jordan Sartell	11/01/22	F. - Settlement Talks and Conferences	drafting joint statement re settlement conference	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	11/01/22	I. - Class Action Notices and Admin.	confer w/notice administrator re undeliverable notices and attempts to contact class members	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	11/07/22	H. - Motion Practice	review ECF 132, ORDER denying Def's motion for class member discovery; confer w/CC re same	0.5	\$ 465.00	\$ 232.50
Paralegal	11/08/22	I. - Class Action Notices and Admin.	class member calls	0.4	\$ 305.00	\$ 122.00
Paralegal	11/08/22	H. - Motion Practice	Research most recent decision in the case; confer with JS re: same.	0.4	\$ 305.00	\$ 122.00
James Francis	11/14/22	H. - Motion Practice	r/r emails and 3rd party subpoenas	1.2	\$ 905.00	\$ 1,086.00
James Francis	11/15/22	F. - Settlement Talks and Conferences	t/c with OC re settlement	0.8	\$ 905.00	\$ 724.00
Lauren Brennan	11/15/22	H. - Motion Practice	Participated in attorney meeting re case status and discovery ruling; reviewed same	0.3	\$ 465.00	\$ 139.50
Paralegal	11/15/22	H. - Motion Practice	discussing case progress w/team	0.2	\$ 305.00	\$ 61.00
Paralegal	11/15/22	E. - Written Discovery	Confer in-firm re order on discovery.	0.2	\$ 305.00	\$ 61.00
James Francis	11/17/22	F. - Settlement Talks and Conferences	t/c with co-counsel re Rogman call/settlement	0.6	\$ 905.00	\$ 543.00
Jordan Sartell	11/17/22	F. - Settlement Talks and Conferences	confer among co-counsel re latest settlement overtures from OC	0.5	\$ 465.00	\$ 232.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	12/02/22	G. - Depositions	prep for (.9), attend deposition of 3d party Van Housen Motors (1.8)	2.7	\$ 465.00	\$ 1,255.50
Jordan Sartell	12/05/22	G. - Depositions	prep for (1), attend deposition of 3d party McGovern Auto Group (1.6)	2.6	\$ 465.00	\$ 1,209.00
Paralegal	12/13/22	F. - Settlement Talks and Conferences	Confer in-firm re case strategy and potential settlement.	0.2	\$ 305.00	\$ 61.00
Lauren Brennan	12/13/22	F. - Settlement Talks and Conferences	Confer re case status and strategy	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	12/20/22	F. - Settlement Talks and Conferences	review ECF 134, setting forth court's instructions and deadlines for 3/9/23 settlement conference; calendar interstitial deadlines	0.4	\$ 465.00	\$ 186.00
John Soumilas	12/28/22	F. - Settlement Talks and Conferences	corresp re settlement	0.6	\$ 805.00	\$ 483.00
John Soumilas	01/03/23	F. - Settlement Talks and Conferences	review memo re status of settlement talks; review scheduling order; outline next steps in litigation and paper memo re same.	1.8	\$ 805.00	\$ 1,449.00
John Soumilas	01/10/23	F. - Settlement Talks and Conferences	corresp among P's counsel re settlement status	0.6	\$ 805.00	\$ 483.00
James Francis	01/11/23	F. - Settlement Talks and Conferences	t/cs with RR re mediation/settlement	1.2	\$ 905.00	\$ 1,086.00
Jordan Sartell	01/11/23	E. - Written Discovery	confer in firm w/JAF, w/CC AET, CBC, MAC re status of settlement negotiations, outstanding discovery	0.3	\$ 465.00	\$ 139.50
James Francis	01/12/23	F. - Settlement Talks and Conferences	t/c with cc re mediation discussion	0.3	\$ 905.00	\$ 271.50
Jordan Sartell	01/17/23	H. - Motion Practice	draft joint motion re stay to formalize settlement; confer w/OC re same; finalize and file same	1.8	\$ 465.00	\$ 837.00
James Francis	01/17/23	H. - Motion Practice	review, edit and revise motion to stay	0.8	\$ 905.00	\$ 724.00
Jordan Sartell	01/18/23	H. - Motion Practice	file stipulation to formalize settlement, PO re same	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	01/19/23	H. - Motion Practice	note ECF 137 ratifying stipulation; confer in firm re relevant deadlines	0.2	\$ 465.00	\$ 93.00
James Francis	01/20/23	F. - Settlement Talks and Conferences	work on setting up mediation--t/cs with Rod Max and OC re the same; call and write to JAMS, NL and other mediators re availability	3.2	\$ 905.00	\$ 2,896.00
James Francis	01/23/23	F. - Settlement Talks and Conferences	t/c with Rod Max re mediation; draft materials to send to OC, cc and mediator	1.8	\$ 905.00	\$ 1,629.00
Jordan Sartell	01/23/23	F. - Settlement Talks and Conferences	calendar upcoming mediation; revise mediation statement and collect materials for mediator	1.3	\$ 465.00	\$ 604.50
Paralegal	01/24/23	F. - Settlement Talks and Conferences	Confer in-firm re case strategy and upcoming settlement conference.	0.2	\$ 305.00	\$ 61.00
John Soumilas	01/27/23	F. - Settlement Talks and Conferences	corresp among P counsel re mediation, logistics, strategy; meet internally re same; review referral corresp and referral fees arrangement .	1.9	\$ 805.00	\$ 1,529.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	02/01/23	F. - Settlement Talks and Conferences	confer among CC, w/OC re draft mediation submissions; review, revise same	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	02/02/23	F. - Settlement Talks and Conferences	review and revise confidential mediation memorandum	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	02/02/23	F. - Settlement Talks and Conferences	participate in pre-mediation call w/mediator R. Max	0.5	\$ 465.00	\$ 232.50
John Soumilas	02/03/23	F. - Settlement Talks and Conferences	review mediation memos; notes for mediation next week.	4.1	\$ 805.00	\$ 3,300.50
John Soumilas	02/03/23	F. - Settlement Talks and Conferences	corresp from D counsel re mediation	0.8	\$ 805.00	\$ 644.00
John Soumilas	02/06/23	F. - Settlement Talks and Conferences	review mediation memo; prepare for mediation and coordinate mediation logistics	4.1	\$ 805.00	\$ 3,300.50
James Francis	02/06/23	F. - Settlement Talks and Conferences	t/c with mediator	0.8	\$ 905.00	\$ 724.00
John Soumilas	02/07/23	F. - Settlement Talks and Conferences	review corresp re mediation; call with J. Francis re same	1.6	\$ 805.00	\$ 1,288.00
Jordan Sartell	02/07/23	F. - Settlement Talks and Conferences	review timeline of settlement efforts to date and additional attorney time and expenses required thereafter; confer w/JS re same	1.4	\$ 465.00	\$ 651.00
John Soumilas	02/08/23	F. - Settlement Talks and Conferences	prepare for mediation meeting; strategy meeting with J. Francis; gather billing date; review scheduling order; outline what are next steps if case settles/ if case does not settle/ timing considerations.	5.5	\$ 805.00	\$ 4,427.50
James Francis	02/08/23	F. - Settlement Talks and Conferences	prepare for mediation	4.6	\$ 905.00	\$ 4,163.00
James Francis	02/09/23	F. - Settlement Talks and Conferences	attend mediation	6.0	\$ 905.00	\$ 5,430.00
James Francis	02/09/23	F. - Settlement Talks and Conferences	travel to mediation	3.5	\$ 905.00	\$ 3,167.50
James Francis	02/09/23	F. - Settlement Talks and Conferences	travel back from mediation	3.5	\$ 905.00	\$ 3,167.50
James Francis	02/09/23	F. - Settlement Talks and Conferences	draft status update to cc re results of mediation; t/c with JS and JS	3.2	\$ 905.00	\$ 2,896.00
Jordan Sartell	02/09/23	F. - Settlement Talks and Conferences	mediation discussion w/CC	1.0	\$ 465.00	\$ 465.00
John Soumilas	02/09/23	F. - Settlement Talks and Conferences	mediation calls/emails/ strategy	1.1	\$ 805.00	\$ 885.50
James Francis	02/13/23	F. - Settlement Talks and Conferences	2nd day of mediation; debrief JS and JS	3.4	\$ 905.00	\$ 3,077.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	02/14/23	F. - Settlement Talks and Conferences	confer in firm w/JAF, JS re final settlement terms	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	02/14/23	F. - Settlement Talks and Conferences	Confer re settlement	0.2	\$ 465.00	\$ 93.00
John Soumilas	02/14/23	F. - Settlement Talks and Conferences	review email correspondence re mediation	0.2	\$ 805.00	\$ 161.00
John Soumilas	02/14/23	F. - Settlement Talks and Conferences	review email correspondence re mediation	0.2	\$ 805.00	\$ 161.00
John Soumilas	02/14/23	F. - Settlement Talks and Conferences	review email correspondence re mediation	0.2	\$ 805.00	\$ 161.00
John Soumilas	02/14/23	F. - Settlement Talks and Conferences	review email correspondence re mediation	0.2	\$ 805.00	\$ 161.00
John Soumilas	02/14/23	F. - Settlement Talks and Conferences	review email correspondence re mediation	0.2	\$ 805.00	\$ 161.00
James Francis	02/16/23	F. - Settlement Talks and Conferences	Prepare for next steps planning call with CBC counsel; t/c with cc and OC.	1.5	\$ 905.00	\$ 1,357.50
Jordan Sartell	02/21/23	F. - Settlement Talks and Conferences	drafting class action settlement agreement	5.0	\$ 465.00	\$ 2,325.00
Jordan Sartell	02/22/23	F. - Settlement Talks and Conferences	drafting exhibits to class action settlement agreement	0.4	\$ 465.00	\$ 186.00
John Soumilas	02/24/23	F. - Settlement Talks and Conferences	review ECF filing re notice of settlement minute order	0.2	\$ 805.00	\$ 161.00
John Soumilas	02/27/23	F. - Settlement Talks and Conferences	review ECF filing re notice of settlement minute order	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/02/23	F. - Settlement Talks and Conferences	review ECF filing re consent/decline of US Magistrate Judge Jurisdiction	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/03/23	I. - Class Action Notices and Admin.	correspondence w/ Frank Barkan re status of case	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/03/23	I. - Class Action Notices and Admin.	correspondence w/ Continental Datalogix re status of case	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	03/06/23	F. - Settlement Talks and Conferences	revise draft settlement agreement; circulate among PI's counsel	0.5	\$ 465.00	\$ 232.50
John Soumilas	03/06/23	I. - Class Action Notices and Admin.	correspondence w/ Frank Barkan re status of case	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/06/23	I. - Class Action Notices and Admin.	communications with class administrator	0.5	\$ 805.00	\$ 402.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	03/06/23	F. - Settlement Talks and Conferences	review draft settlement agreement	0.4	\$ 805.00	\$ 322.00
John Soumilas	03/06/23	F. - Settlement Talks and Conferences	review settlement agreement edits by Amy Tabor	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/08/23	F. - Settlement Talks and Conferences	review final settlement agreement to defense counsel	0.4	\$ 805.00	\$ 322.00
John Soumilas	03/08/23	F. - Settlement Talks and Conferences	correspondence with Rodman for review of settlement agreement	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/22/23	F. - Settlement Talks and Conferences	follow up with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/22/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/22/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	03/24/23	I. - Class Action Notices and Admin.	confer w/CDLx, the notice administrator, re 4/10 MPA deadline and anticipated class administration	0.4	\$ 465.00	\$ 186.00
John Soumilas	03/27/23	F. - Settlement Talks and Conferences	review email correspondence re update from Defense counsel re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	03/29/23	F. - Settlement Talks and Conferences	r/r email corresp re class data	0.2	\$ 465.00	\$ 93.00
John Soumilas	03/30/23	F. - Settlement Talks and Conferences	review revised draft of final settlement agreement	0.4	\$ 805.00	\$ 322.00
John Soumilas	03/31/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	03/31/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/03/23	F. - Settlement Talks and Conferences	confer w/client re status of settlement agreement drafting	0.6	\$ 465.00	\$ 279.00
John Soumilas	04/04/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/04/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/05/23	F. - Settlement Talks and Conferences	review def's proposed redlines to settlement agreement; confer w/JS re same	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	04/05/23	I. - Class Action Notices and Admin.	confer w/notice administrator re settlement administration cost estimates	0.5	\$ 465.00	\$ 232.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	04/05/23	I. - Class Action Notices and Admin.	confer in firm w/JS re preliminary approval/fee petition issues and related caselaw	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	04/06/23	H. - Motion Practice	confer w/OC re extension stipulation; prepare and file same	1.4	\$ 465.00	\$ 651.00
Jordan Sartell	04/06/23	I. - Class Action Notices and Admin.	review settlement administration cost estimates; confer w/notice administrator re same	0.2	\$ 465.00	\$ 93.00
John Soumilas	04/06/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/06/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/06/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/06/23	F. - Settlement Talks and Conferences	communication with Defense counsel re final settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/06/23	F. - Settlement Talks and Conferences	review and revise draft settlement agreement	3.6	\$ 805.00	\$ 2,898.00
John Soumilas	04/06/23	I. - Class Action Notices and Admin.	review class notice bid estimate	1.1	\$ 805.00	\$ 885.50
John Soumilas	04/06/23	H. - Motion Practice	review stip and proposed order for extension of deadline to file motion for preliminary approval	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/07/23	I. - Class Action Notices and Admin.	review revised class notice bid estimate	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/07/23	H. - Motion Practice	review order to extend deadline to file motion for final approval	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/10/23	F. - Settlement Talks and Conferences	review Def's redlines to draft settlement agreement; confer w/CC AET re same; escalate remaining issues to JAF, MAC for review	2.4	\$ 465.00	\$ 1,116.00
John Soumilas	04/13/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/17/23	F. - Settlement Talks and Conferences	confer w/JAF re revisions to S.A.	0.2	\$ 465.00	\$ 93.00
John Soumilas	04/17/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/17/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/17/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/17/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	04/20/23	H. - Motion Practice	drafting motion for preliminary approval	1.7	\$ 465.00	\$ 790.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Jordan Sartell	04/20/23	H. - Motion Practice	revise draft long form notice	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	04/20/23	F. - Settlement Talks and Conferences	review JAF-revised settlement agreement; provide revisions, comments	0.5	\$ 465.00	\$ 232.50
Jordan Sartell	04/20/23	F. - Settlement Talks and Conferences	confer in firm w/JAF re settlement drafting details, esp. around funding/payment vehicle	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	04/20/23	H. - Motion Practice	prep add'l stip re extension; confer w/OC re same; finalize and file	0.4	\$ 465.00	\$ 186.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review Jordan Sartell's revisions to settlement agreement	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re week extension	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re week extension	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re week extension	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re week extension	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review Jim Francis' revisions to settlement agreement draft	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review minor edits by Jordan Sartell to settlement agreement draft	0.1	\$ 805.00	\$ 80.50
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/20/23	H. - Motion Practice	review stip re 139 minute order extension	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review word version of stip sent to Judge Oberto	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	04/20/23	F. - Settlement Talks and Conferences	review email correspondence re settlement agreement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/21/23	H. - Motion Practice	legal research in support of motion for preliminary approval, motion for attorneys' fees and costs	6.8	\$ 465.00	\$ 3,162.00
John Soumilas	04/21/23	F. - Settlement Talks and Conferences	review further revisions of James Francis to settlement agreement	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/21/23	F. - Settlement Talks and Conferences	review email correspondence re revisions to settlement agreement	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/24/23	H. - Motion Practice	drafting motion for preliminary approval, related orders and notices	3.0	\$ 465.00	\$ 1,395.00
James Francis	04/24/23	F. - Settlement Talks and Conferences	review JS research re lodestar approach to Settlement agreement; research QSF issue; prepare for call with OC	2.3	\$ 905.00	\$ 2,081.50
Jordan Sartell	04/24/23	H. - Motion Practice	legal research in support of motion for preliminary approval, motion for attorneys' fees and costs	1.9	\$ 465.00	\$ 883.50
James Francis	04/24/23	F. - Settlement Talks and Conferences	t/c with OC re settlement agreement edits	0.9	\$ 905.00	\$ 814.50
Jordan Sartell	04/24/23	F. - Settlement Talks and Conferences	confer w/OC, JAF re final revisions to settlement agreement	0.7	\$ 465.00	\$ 325.50
Jordan Sartell	04/24/23	F. - Settlement Talks and Conferences	confer w/JAF, class admin re final revisions to settlement agreement	0.4	\$ 465.00	\$ 186.00
Lauren Brennan	04/24/23	H. - Motion Practice	Confer re research for fee petition/preliminary approval	0.2	\$ 465.00	\$ 93.00
John Soumilas	04/24/23	H. - Motion Practice	review JS research of decisions within 9th Cir. and CA district courts	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	F. - Settlement Talks and Conferences	email correspondence with co-counsel re settlement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	F. - Settlement Talks and Conferences	email correspondence with co-counsel re settlement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	F. - Settlement Talks and Conferences	email correspondence with co-counsel re settlement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	F. - Settlement Talks and Conferences	email correspondence with co-counsel re settlement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	F. - Settlement Talks and Conferences	email correspondence re revisions to settlement agreement with co-counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	H. - Motion Practice	review JS research of settlement agreements from other cases	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/24/23	H. - Motion Practice	review order on stip for further 7-day extension	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	04/25/23	H. - Motion Practice	drafting motion for preliminary approval, related orders and notices	1.2	\$ 465.00	\$ 558.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
James Francis	04/25/23	F. - Settlement Talks and Conferences	t/c with Frank re QSF issue	1.2	\$ 905.00	\$ 1,086.00
Jordan Sartell	04/25/23	F. - Settlement Talks and Conferences	review def's latest revisions to settlement agreement	0.7	\$ 465.00	\$ 325.50
			edit/revise settlement agreement after talk to RR		\$ 905.00	\$ 6,968.50
John Soumilas	04/25/23	F. - Settlement Talks and Conferences	review further revised settlement agreement from D counsel	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/25/23	F. - Settlement Talks and Conferences	review accepted revisions from redlined settlement agreement by Jordan Sartell	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/25/23	F. - Settlement Talks and Conferences	email correspondence with Defense counsel re settlement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/25/23	F. - Settlement Talks and Conferences	email correspondence with Defense counsel re settlement draft	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/25/23	F. - Settlement Talks and Conferences	email correspondence with Defense counsel re settlement draft	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/26/23	F. - Settlement Talks and Conferences	review and revise draft class notice; confer w/OC re same	1.5	\$ 465.00	\$ 697.50
Jordan Sartell	04/26/23	H. - Motion Practice	drafting motion for preliminary approval	1.1	\$ 465.00	\$ 511.50
John Soumilas	04/26/23	F. - Settlement Talks and Conferences	correspondence re cy pres language with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/26/23	F. - Settlement Talks and Conferences	correspondence re cy pres language with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/26/23	F. - Settlement Talks and Conferences	review final settlement agreement draft	0.4	\$ 805.00	\$ 322.00
John Soumilas	04/26/23	F. - Settlement Talks and Conferences	review approved settlement agreement from Defense counsel	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	04/27/23	H. - Motion Practice	drafting motion for preliminary approval	7.3	\$ 465.00	\$ 3,394.50
John Soumilas	04/27/23	F. - Settlement Talks and Conferences	discussion re minor edit to settlement agreement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/27/23	F. - Settlement Talks and Conferences	discussion re minor edit to settlement agreement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/27/23	F. - Settlement Talks and Conferences	discussion re minor edit to settlement agreement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/27/23	F. - Settlement Talks and Conferences	discussion re minor edit to settlement agreement	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	04/27/23	F. - Settlement Talks and Conferences	discussion re minor edit to settlement agreement	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/27/23	I. - Class Action Notices and Admin.	review class notice language in settlement agreement with Defense counsel	0.4	\$ 805.00	\$ 322.00
Jordan Sartell	04/28/23	H. - Motion Practice	drafting motion for preliminary approval	3.0	\$ 465.00	\$ 1,395.00
Jordan Sartell	04/28/23	F. - Settlement Talks and Conferences	confer w/OC, CC JAF, AET re final revisions to settlement agreement/notice	1.3	\$ 465.00	\$ 604.50
John Soumilas	04/28/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/28/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/28/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/28/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/28/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
James Francis	04/30/23	H. - Motion Practice	work on review of motion for preliminary approval	4.7	\$ 905.00	\$ 4,253.50
Jordan Sartell	04/30/23	H. - Motion Practice	drafting motion for preliminary approval	3.8	\$ 465.00	\$ 1,767.00
John Soumilas	04/30/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	04/30/23	F. - Settlement Talks and Conferences	discussion re class notice language in settlement agreement with Defense counsel	0.2	\$ 805.00	\$ 161.00
James Francis	05/01/23	H. - Motion Practice	review, edit and revise final settlement agreement; motion for preliminary approval; r/r emails with cc re the same	8.7	\$ 905.00	\$ 7,873.50
Jordan Sartell	05/01/23	H. - Motion Practice	drafting motion for preliminary approval, finalize and supervise filing of same	7.4	\$ 465.00	\$ 3,441.00
John Soumilas	05/01/23	H. - Motion Practice	reviewed and revised draft of preliminary approval	4.4	\$ 805.00	\$ 3,542.00
John Soumilas	05/01/23	H. - Motion Practice	review relined suggestions from co-counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/23	H. - Motion Practice	review relined suggestions from co-counsel	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/23	H. - Motion Practice	review preliminary approval edits by Jim Francis	0.4	\$ 805.00	\$ 322.00
John Soumilas	05/01/23	H. - Motion Practice	review brief of preliminary approval motion	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/23	H. - Motion Practice	review brief of preliminary approval motion	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/23	F. - Settlement Talks and Conferences	review fully executed settlement agreement with exhibits	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/23	H. - Motion Practice	correspondence re preliminary approval	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/01/23	H. - Motion Practice	review filed motion to certify class for settlement purposes	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	05/01/23	H. - Motion Practice	review filed memo of motion to certify class	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/02/23	I. - Class Action Notices and Admin.	confer w/client re approval, notice, and administration timeline	0.2	\$ 465.00	\$ 93.00
Jordan Sartell	05/03/23	H. - Motion Practice	legal research for anticipated fee petition	1.6	\$ 465.00	\$ 744.00
John Soumilas	05/03/23	H. - Motion Practice	review ECF filing of minute order re preliminary approval motion and hearing	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/04/23	I. - Class Action Notices and Admin.	confer w/OC re identification of CCRAA-only class members	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	05/15/23	I. - Class Action Notices and Admin.	note ECF 151, Def's statement of non-opposition to MPA	0.2	\$ 465.00	\$ 93.00
John Soumilas	05/15/23	H. - Motion Practice	review ECF filing of non-opposition to motion by CBC	0.2	\$ 805.00	\$ 161.00
John Soumilas	05/15/23	I. - Class Action Notices and Admin.	review engagement letter from Frank Barkan	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/19/23	I. - Class Action Notices and Admin.	note Def's filling of CAFA notice certification	0.2	\$ 465.00	\$ 93.00
John Soumilas	05/19/23	H. - Motion Practice	review ECF notice re class certification	0.2	\$ 805.00	\$ 161.00
Jordan Sartell	05/23/23	I. - Class Action Notices and Admin.	confer w/admin re class notice, exclusion form	0.6	\$ 465.00	\$ 279.00
Jordan Sartell	05/31/23	I. - Class Action Notices and Admin.	confer w/settlement admin re draft notice forms	0.4	\$ 465.00	\$ 186.00
Jordan Sartell	06/02/23	H. - Motion Practice	review ECF 153, order preliminarily approving settlement; confer in firm w/CC re same; confer w/Admin re upcoming notice deadlines	1.2	\$ 465.00	\$ 558.00
Jordan Sartell	06/07/23	H. - Motion Practice	gathering time records for fee petition	0.9	\$ 465.00	\$ 418.50
Jordan Sartell	06/07/23	I. - Class Action Notices and Admin.	confer w/settlement administrator re proofs of notice for mailing and email	0.4	\$ 465.00	\$ 186.00
John Soumilas	06/07/23	F. - Settlement Talks and Conferences	email correspondence re initial funding, Ritesh Patel	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/05/23	I. - Class Action Notices and Admin.	review invoice from Frank Barkan re class notices	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/13/23	H. - Motion Practice	email correspondence re fee petition	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/13/23	H. - Motion Practice	email correspondence re fee petition	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/19/23	H. - Motion Practice	email correspondence re fee petition	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/19/23	H. - Motion Practice	email correspondence re fee petition	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/20/23	H. - Motion Practice	email correspondence re fee petition	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/21/23	H. - Motion Practice	email correspondence re fee petition time and expenses	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/24/23	H. - Motion Practice	email correspondence re fee petition time and expenses	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/24/23	H. - Motion Practice	email correspondence re fee petition time and expenses	0.2	\$ 805.00	\$ 161.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
John Soumilas	07/24/23	H. - Motion Practice	email correspondence re fee petition time and expenses	0.2	\$ 805.00	\$ 161.00
John Soumilas	07/24/23	H. - Motion Practice	email correspondence re fee petition time and expenses	0.2	\$ 805.00	\$ 161.00
James Francis	07/25/23	H. - Motion Practice	review/edit/revise Motion for Attorneys' Fees/Declaration	8.2	\$ 905.00	\$ 7,421.00
John Soumilas	07/25/23	H. - Motion Practice	review time sheets for fee petition	2.1	\$ 805.00	\$ 1,690.50
Jordan Sartell	07/27/23	H. - Motion Practice	drafting mot. Attys fees, costs, service award	4.0	\$ 465.00	\$ 1,860.00
Jordan Sartell	07/28/23	H. - Motion Practice	drafting mot. Attys fees, costs, service award	6.0	\$ 465.00	\$ 2,790.00
Paralegal	07/28/23	H. - Motion Practice	review and finalize time sheets for fee petition	3.5	\$ 305.00	\$ 1,067.50
Paralegal	07/28/23	H. - Motion Practice	organize travel for final approval hearing	1.5	\$ 305.00	\$ 457.50
Jordan Sartell	07/31/23	H. - Motion Practice	drafting mot. Attys fees, costs, service award	4.0	\$ 465.00	\$ 1,860.00
Jordan Sartell	08/01/23	H. - Motion Practice	review, revise mot. Atty fees, costs for filing; supervise filing of same	8.2	\$ 465.00	\$ 3,813.00
Paralegal	08/01/23	H. - Motion Practice	assist with prepration of exhibits, final MoL for Fee Petition; file fee petition	6.0	\$ 305.00	\$ 1,830.00
James Francis	09/19/23	H. - Motion Practice	(anticipated) draft/edit/revise motion for final approval	9.5	\$ 905.00	\$ 8,597.50
Jordan Sartell	09/19/23	H. - Motion Practice	(anticipated) draft/edit/revise motion for final approval	10.0	\$ 465.00	\$ 4,650.00
James Francis	09/20/23	H. - Motion Practice	(anticipated) draft/edit/revise motion for final approval	8.5	\$ 905.00	\$ 7,692.50
Jordan Sartell	09/20/23	H. - Motion Practice	(anticipated) draft/edit/revise motion for final approval	10.0	\$ 465.00	\$ 4,650.00
James Francis	10/23/23	H. - Motion Practice	(anticipated): Prepare for Final approval hearing; review all submissions, class member correspondence	6.5	\$ 905.00	\$ 5,882.50
James Francis	10/24/23	H. - Motion Practice	(anticipated): travel to final approval hearing	9.5	\$ 905.00	\$ 8,597.50
James Francis	10/25/23	H. - Motion Practice	(anticipated) attend final approval hearing; prepare next steps	3.0	\$ 905.00	\$ 2,715.00
James Francis	10/25/23	H. - Motion Practice	(anticipated) travel back from final approval hearing	9.5	\$ 905.00	\$ 8,597.50
James Francis	10/26/23	H. - Motion Practice	(anticipated) settlement administration issues/potential appeal	24.0	\$ 905.00	\$21,720.00
Jordan Sartell	10/26/23	H. - Motion Practice	(anticipated) settlement administration issues/potential appeal	24.0	\$ 465.00	\$11,160.00
James Francis	10/27/23	H. - Motion Practice	(anticipated) settlement administration/potential appeal	24.0	\$ 905.00	\$21,720.00
Jordan Sartell	10/27/23	H. - Motion Practice	(anticipated) settlement administration/potential appeal	24.0	\$ 465.00	\$11,160.00

EXHIBIT B

	Date	Type	No.	Payee	Memo/Description	Split	Amount	Balance
Pro Hac Vice								
	08/21/2019	Expense			US DISTRICT COURT CAED	Credit Card	225.00	225.00
							\$ 225.00	
Travel								
Airfare								
	09/06/2019	Check	8577	Jordan Sartell		OLD MAIN CHECKING	1,171.96	1,171.96
							\$ 1,171.96	
Cabs								
	09/06/2019	Check	8577	Jordan Sartell		OLD MAIN CHECKING	285.31	285.31
	03/13/2020	Expense			UBER TRIP HELP.UBER.COM CA	Credit Card	9.27	294.58
	01/09/2021	Expense			UBER TRIP HELP.UBER.COM CA	Credit Card	55.58	350.16
	01/09/2021	Expense			UBER TRIP HELP.UBER.COM CA	Credit Card	32.78	382.94
	01/23/2023	Expense			VALLEY GREEN INN PHILADELPHIA PA	Credit Card	54.12	437.06
	02/03/2023	Expense		Uber	UBER TRIP HELP.UBER.COM CA	Credit Card	24.63	461.69
	02/04/2023	Expense		Uber	UBER TRIP HELP.UBER.COM CA	Credit Card	39.12	500.81
	02/10/2023	Expense		Uber	UBER TRIP HELP.UBER.COM CA	Credit Card	17.54	518.35
							\$ 518.35	
Lodging								
	08/20/2019	Expense			HOTELSCOM8015690605795	Credit Card	194.03	194.03
	08/20/2019	Expense			HOTELSCOM8025745955267	Credit Card	229.84	423.87
							\$ 423.87	
Train								
	02/09/2023	Expense		Amtrak	AMTRAK NRTHEAST CAFE Q12 WASHINGTON DC	Credit Card	31.25	31.25
	02/09/2023	Expense		Amtrak	AMTRAK MOBIL0380694081858 WASHINGTON DC	Credit Card	240.00	271.25
	02/09/2023	Expense		Amtrak	AMTRAK MOBIL0400743053748 WASHINGTON DC	Credit Card	137.00	408.25
	02/10/2023	Expense		Amtrak	61501 - AMTRAK - NORTH PHILADELPHIA PA	Credit Card	28.00	436.25
							\$ 436.25	
Subtotal for Travel							\$ 2,550.43	
TOTAL							\$48,586.73	

EXHIBIT C



FRANCIS MAILMAN SOUMILAS, P.C. (FMS) is a law firm that concentrates in consumer protection litigation. While principally based in center-city Philadelphia, the firm also maintains offices in New York, Chicago, and San Francisco. FMS represents consumers in both individual and class actions. Founded in 1998 as Francis & Mailman, P.C., the firm's goal is to provide exceptional advocacy to consumers subjected to unfair business, industry, and trade practices.

FMS is one of the nation's preeminent consumer protection litigation firms. The firm has obtained numerous ground-breaking legal decisions, record jury verdicts and large consumer settlements. In 2017, FMS obtained a record \$60 million dollar class action verdict for a case tried under the Fair Credit Reporting Act. The case ultimately went to the United States Supreme Court, which resulted in a 5-4 remand decision that has become a landmark case in civil litigation concerning the issue of constitutional standing. The firm has been certified to serve as class counsel in over 70 consumer class actions nationwide.

Due to its litigation proficiency, expertise and the high caliber of its work-product, FMS has been repeatedly recognized and commended by federal courts throughout the country over many years. *Barel v. Bank of America*, 255 F.R.D. 393, 398-99 (E.D. Pa. 2009) (finding firm "competent, experienced and well-qualified to prosecute class actions" and noting that class counsel "have done an excellent job in representing the class in the instant litigation."); *Martinez v. Avantus, LLC*, ___ F.R.D. ___, 2023 WL 112807, *9 (D. Conn. Jan. 5, 2023)(firm "has substantial experience in class action litigation, including FCRA class actions....[and] demonstrated proficiency at all stages of suit"); *Ramirez v. Trans Union, LLC*, 2022 WL 17722395 (N.D. Cal. Dec. 15, 2022)("Courts have consistently recognized Francis Mailman Soumilas 'for its expertise in FCRA litigation and the high caliber of its work for the classes it represents.'"); *Der Hacopian v. SentryLink, C.A. 18-3001* (D. Md., Nov. 23, 2020)(firm "many, many times in the past has been found to be not just qualified or competent, but extremely well-qualified and competent to represent consumer classes in many, many other jurisdictions, not only this particular jurisdiction"); *Flores v. Express Services, Inc.*, C.A. No.14-3298, 2017 WL 1177098, at *3 (E.D. Pa. March 30, 2017) (firm "has extensive experience in consumer class action litigation); *White v. Equifax Info. Solutions*, No. 05-01070, 2014 WL 1716154, at *13, 19, 22 (C.D. Cal. May 1, 2014), *aff'd sub nom. Radcliffe v. Equifax Info. Sol'ns., Inc.*, 818 F.3d 537, 548 (9th Cir. 2016) (appointing firm and its team as interim class counsel over objections from a competing national law firm (Boies Schiller) because firm's team's "credentials and experience [we]re significantly stronger in class action and FCRA litigation."); *Patel v. Trans Union, LLC*, 308 F.R.D. 292, 307 (N.D. Cal. 2015) (FMS "have represented consumer classes in many cases in many districts . . . [and] have shown their proficiency in this case[.]"); *Kelly v. Business Information Group*, C.A. 15-6668, 2019 WL 414915 (E.D. Pa. 2019) (firm "qualified and experienced attorneys" --- Francis & Mailman, P.C., of Philadelphia...who have substantial experience in class action and FCRA consumer litigation and who are qualified to conduct the litigation."); *Larson v. Trans Union, LLC*, C.A. 12-cv-05726, 2015 WL 3945052, at *12 (N.D. Cal. June 26, 2015) (appointing firm as class counsel on contested motion);

JAMES A. FRANCIS

JIM FRANCIS co-founded FMS in 1998 with the goal of creating a law firm dedicated exclusively to consumer rights litigation. Since then, he and the firm have consistently achieved ground-breaking results and cutting-edge legal rulings. He was trial and appellate counsel in *Ramirez v. Trans Union, LLC*, a case that obtained a record \$60 million dollar verdict for a case brought under the Fair Credit Reporting Act. In 2009, Jim argued the seminal FCRA case of *Cortez v. Trans Union, LLC* before the Third Circuit Court of Appeals. He has been appointed to serve as class counsel by federal courts all over the country in over 70 cases.

In 2004, Jim was the youngest lawyer to be ranked a Top 100 Super Lawyer in Pennsylvania in *Philadelphia Magazine* and *Pennsylvania Super Lawyers* magazine. He has been ranked a Top 100 Superlawyer for Pennsylvania and Philadelphia many times since, including in 2023. In 2014, Jim was selected as one of a small group of national plaintiffs' lawyers to be profiled in Law 360's *Titans of the Plaintiff's Bar* series. In the same year, he was awarded the *Equal Justice Award* by Community Legal Services of Philadelphia.

In 2023, Jim was elected as a Fellow of the American College of Consumer Financial Services Lawyers.

Jim regularly lectures for continuing legal education programs, law schools and community groups throughout the country, and has been a regular speaker for the National Association of Consumer Advocates (NACA) and National Consumer Law Center (NCLC) for over 20 years. He has appeared on various news programs including the *Today Show* and *PBS NewsHour* to discuss consumer-related issues. He was featured in *The Philadelphia Inquirer's* biographical "Question & Answer" segment in February of 2009.

Prior to forming FMS and after graduating from law school, Jim was an associate with Kolsby, Gordon, Robin, Shore & Rothweiler in Philadelphia.

EDUCATION

Temple University Beasley School of Law, J.D. 1995, President-Student Bar Association, 1995 Wapner, Newman & Wigrizer, P.C. award for excellence in civil trial advocacy; award for outstanding Oral Advocacy;

Muhlenberg College, B.A., *cum laude*, 1992

ADMISSIONS

- Pennsylvania and New Jersey state courts
- United States Courts of Appeal for the First, Second, Third, Fourth, Sixth, Seventh, Ninth and Eleventh Circuits
- United States District Courts for the Eastern District of Pennsylvania, Middle District of Pennsylvania, District of New Jersey, Eastern District of Michigan, Northern District of Oklahoma

- United States Supreme Court

HONORS/AWARD/DISTINCTIONS

- Top 100 Superlawyer for Pennsylvania-2004, 2005, 2007, 2008, 2012, 2014, 2015, 2021, 2022, 2023
- Top 100 Superlawyer for Philadelphia-2006, 2007, 2008, 2011, 2012, 2014, 2015, 2016, 2018, 2019, 2021, 2022, 2023
- Law 360's *Titan of the Plaintiff's Bar*-2014
- *Equal Justice Award* by Community Legal Services of Philadelphia-2014
- Elected as a Fellow into the American College of Consumer Financial Services—April 29th, 2023

NOTABLE CASES

- *Teran v. Navient Solutions, LLC et al.*, __B.R. __, 2023 WL 2721904 (Bankr. N.D. Cal. Mar. 30, 2023). Appointed Class Counsel to represent national injunctive relief class.
- *Ramirez v. Trans Union, LLC*, 951 F.3d 1008 (9th Cir. 2020), 141 S.Ct. 2190 (2021); 2022 WL 17740302 (N.D. Cal. Dec. 22, 2022); . Served as trial and appellate counsel in record \$60 million jury verdict for a case brought under the Fair Credit Reporting Act; argued appeal against former Solicitor General of the United States affirming verdict (with remittitur), upon certiorari, remanded by US Supreme; later settled for \$9 million
- *Robinson v. National Student Clearinghouse*, No. 1-19-cv-10749, 2020 WL 4873728 (D. Mass. July 8, 2020) *aff'd* 14 F.4th 56 (1st Cir. 2021). In first challenging the defendant as a consumer reporting agency, obtained \$2 million dollar settlement for consumers who were overcharged for college verifications and brought company into FCRA compliance.
- *Patel v. Trans Union, LLC*, 2018 WL 1258194 (N.D. Cal. March 11, 2018). Served as lead Class Counsel in case which obtained an \$8 million dollar settlement for class of consumers who were falsely being reported as terrorists.
- *Thomas v. Equifax Info. Services, LLC*, No. 18-cv-684 (E.D. Va.). National Class Counsel in FCRA class action, alleging violations by credit bureau for misreporting public records, providing nationwide resolution of class action claims asserted across multiple jurisdictions, including injunctive relief, and an uncapped mediation program for millions of consumers.
- *Clark v. Experian Info. Sols., Inc.*, No. 16-cv-32 (E.D. Va.). National Class Counsel in FCRA class action, alleging violations by credit bureau for misreporting public records, providing a nationwide resolution of class action claims asserted by 32 plaintiffs in 16 jurisdictions, including injunctive relief and an uncapped mediation program, for millions of consumers.
- *Clark/Anderson v. Trans Union, LLC*, No. 15-cv-391 & No. 16-cv-558 (E.D. Va.). National Class Counsel in FCRA consolidated class action, alleging violations by credit bureau for misreporting public records, providing groundbreaking injunctive relief, and an opportunity to recover monetary relief, for millions of consumers.
- *In Re: TRS Recovery Services, Inc. and Telecheck Services, Inc.*, Fair Debt Collection Practices Act (FDCPA Litigation)- Served as Class Counsel in a national FDCPA class

action and obtained a 3.4-million-dollar settlement against one of the nation's largest check history consumer reporting agencies.

- *Berry v. LexisNexis Risk & Info. Analytics Group, Inc.*, No. 3:11-cv-754, 2014 WL 4403524, at *11 (E.D. Va. Sept. 5, 2014) -- Appointed class counsel in national FCRA class action that obtained a \$13.5-million-dollar settlement against Lexis/Nexis, one of the largest information providers in the world, along with a groundbreaking injunctive relief settlement on behalf of 200 million Americans in which LexisNexis agreed to bring its Accurint product into FCRA compliance.
- *Thomas v. BackgroundChecks.com*, C.A. No. 13-029 (E.D. Va. Aug. 11, 2015) –Appointed class counsel in an FCRA national class action which obtained \$18 million against another of the largest background screening companies in the world, and also obtained significant injunctive and remedial relief.
- *Henderson v. Acxiom Risk Mitigation, Inc.*, C.A. No. 12-589 (E.D. Va., Aug. 7, 2015)- Appointed class counsel in a national FCRA class action which obtained a \$20.8 million settlement against one of the largest data sellers and background screening companies in the world.
- *Ryals et al. v. Hireright Solutions, Inc.*, C.A. No. 3:09cv625 (E.D. Va. Dec. 22, 2011) – \$28.3 million national settlement achieved for class of consumers subjected to employment background checks in case brought under Fair Credit Reporting Act (FCRA); believed to be the third largest FCRA settlement in history.
- *Cortez v. Trans Union, LLC*, 617 F.3d 688 (3d. Cir. 2010) – argued precedential case of first impression before the U.S. Court of Appeals for the Third Circuit which outlines the liability, causation and damages standards for FCRA cases against credit reporting agencies; \$800,000 jury verdict against Trans Union in fair credit reporting case (remitted to \$150,000).
- *Little v. Kia Motors America, Inc.*, 2003 WL 25568765 (N.J. Super. L. 2003) – \$6 million (approximate) verdict for class of New Jersey car purchasers.
- *Samuel-Bassett v. Kia Motors America, Inc.*, __ A.3d __, 2011 WL 60559098 (Pa. 2011), C.P. Phila. County, January Term, 2001, No. 2199 – \$5.6 million verdict for class of Pennsylvania car purchasers, plus award of attorney’s fees.
- *Serrano v. Sterling Testing Systems, Inc.*, __ F. Supp. 2d __, 2008 WL 2223007 (E.D. Pa. May 30, 2008) – federal court finding as a matter of first impression what defines a record of arrest under the FCRA.
- *Ziegenfuse v. Apex Asset Management, LLC*, 239 F.R.D. 400 (E.D. Pa. 2006) – obtained court decision holding that offers of judgment under Rule 68 of the Federal Rules of Civil Procedure cannot be used in class actions.
- *Stoner v. CBA Information Services*, 352 F. Supp. 2d 549 (E.D. Pa. 2005) – obtained \$772,500 settlement for class of consumers who disputed errors in their credit reports.
- *Richburg v. Palisades Collection, LLC*, 247 F.R.D. 457 (E.D. Pa. 2008); federal court ruled that actions to collect delinquent credit card debt in Pennsylvania subject to 4 year statute of limitations (not 6 as the defendant collection agency had argued).

- *Perry v. FleetBoston Financial Corp.*, 2004 WL 1508518 (E.D. Pa. 2004) – defeated motion to compel arbitration in class action brought under Fair Credit Reporting Act.
- *Crane v. Trans Union, LLC*, 282 F. Supp. 2d 311 (E.D. Pa. 2003) – federal court held that credit reporting agencies that merely parrot information from credit furnishers and fail to forward dispute documentation face claims for punitive damages under the Fair Credit Reporting Act; violation of the Fair Credit Reporting Act presents a violation of Pennsylvania’s Consumer Protection Law).
- *Lawrence v. Trans Union, LLC*, 296 F. Supp. 2d 582 (E.D. Pa. 2003) (same).
- *Wisneski v. Nationwide Collections, Inc.*, 227 F.R.D. 259 (E.D. Pa. 2004) – obtained class certification in Fair Debt Collection Practices action in which a Pennsylvania federal court held for the first time that statutory net worth limitation is not limited to balance sheet net worth, and includes equity, capital stock and goodwill.
- *Evantash v. G.E. Capital Mortgage Services, Inc.*, 2003 WL 22844198 (E.D. Pa. 2003) – federal court held that technical accuracy defense was not available to defendants under the Fair Credit Reporting Act.
- *Sheffer v. Experian Information Solutions, Inc.*, 2003 WL 21710573 (E.D. Pa. 2003) – federal court held that Fair Credit Reporting Act permits as recoverable damage emotional distress in trying to correct errors in a consumer’s credit file, even where no pecuniary or out-of-pocket losses.
- *Sheffer v. Experian Information Solutions Inc.*, 249 F. Supp. 2d 560 (E.D. Pa. 2003) – federal court held that FCRA provides a private right of action against furnishers of information.
- *Sullivan v. Equifax, Inc. et al.*, 2002 U.S. Dist. LEXIS 7884 (E.D. Pa. 2002) – federal court held that reporting a debt to a credit reporting agency is a communication covered by the Fair Debt Collection Practices Act.
- *Wenrich v. Cole*, 2000 U.S. Dist. LEXIS 18687 (E.D. Pa. 2000) – federal court held that FDCPA provides protection for all persons, not just consumers.
- *Jaramillo v. Experian Information Solutions, Inc.*, 155 F. Supp. 2d 356 (E.D. Pa. 2001) – federal court held that single publication rule does not apply to actions brought for violation of the Fair Credit Reporting Act.

CLASS COUNSEL CERTIFICATIONS

Schultz v. Emory University, No. 1:20-cv-02002-TWT, ECF 98 (N.D. Ga. June 15, 2023)

Botts v. The Johns Hopkins University, No. 1:20-cv-01335-JRR, ECF 96 (D. Md. April 20, 2023)

Teran v. Navient Solutions, LLC et al., No. 20-03075-DM,
2023 WL 2721904 (Bankr. N.D. Cal. Mar. 30, 2023)

Martinez v. Avantus, LLC, No. 3:20-CV-1772 (JCH), 2023 WL 112807 (D. Conn. Jan. 5, 2023)

Stewart et al v. LexisNexis Risk Data Retrieval Services, LLC et al., No. 3:20-cv-00903-JAG
(E.D. Va. July 27, 2022)

Healy v. Milliman, Inc., No. 2:20-cv-01473-JCC (W.D. Wash. 2022)

Kang v. Credit Bureau Connection, Inc., No. 18-01359, 2022 WL 658105 (E.D. Cal. Mar. 4, 2022)

Watson v. Checkr, Inc., No. 3:19-cv-03396-EMC (N.D. Cal. 2021)

Deaton v. Trans Union, LLC, No. 2:20-cv-01380-AB (E.D. Pa. 2021)

Sanders v. Makespace Labs, Inc., No. 1:18-cv-10016 (S.D.N.Y. Mar. 29, 2021)

Der-Hacopian v. Darktrace, Inc., No. 18-cv-06726-HSG (N.D. Cal. Dec. 10, 2020)

Der-Hacopian v. Sentrylink, LLC, No. 8:18-cv-03001-PWG (N.D. Cal. Nov. 23, 2020)

McIntyre v. RealPage, Inc., No. 2:18-cv-03934, WL 5017612 (E.D. Pa. Aug. 25, 2020)

Norman v. Trans Union, LLC, No. 18-5225, 2020 WL 4735538 (E.D. Pa. Aug. 14, 2020)

Robinson v. National Student Clearinghouse, No. 1-19-cv-10749, 2020 WL 4873728 (D. Mass. July 8, 2020) *aff'd* 14 F.4th 56 (1st Cir. 2021)

Leo v. Appfolio, Inc., No.3:17-cv-05771-RJB (W.D. Wash. 2019)

Thomas v. Equifax Info. Services, LLC, No. 18-cv-684 (E.D. Va. 2020)

Clark v. Experian Info. Sols., Inc., No. 16-cv-32 (E.D. Va. 2019)

Clark/Anderson v. Trans Union, LLC, No. 15-cv-391 & No. 16-cv-558 (E.D. Va. 2018)

Gibbons v. Weltman, Weinberg & Reis Co., LPA, 2018 WL 5720749 (E.D. Pa. Oct. 31, 2018)

Kelly v. Business Information Group, C.A. 15-6668, 2019 WL 414915 (E.D. Pa. 2019)

Ridenour v. Multi-Color Corporation, C.A. No. 2:15-cv-00041, (E.D. Va., Jan. 13, 2017)

Flores v. Express Personnel, C.A. No. 14-cv-03298, (E.D. Pa. Oct. 21, 2016)

Larson v. Trans Union, LLC, C.A. No. 12-cv-05726, (N.D. CA, Aug. 11, 2016)

Miller v. Trans Union, LLC, C.A. No. 12-cv-1715, (M.D. PA, Dec. 26, 2016)

Henderson v. Trans Union, LLC, C.A. No. 14-cv-00679, E.D. Va., May 3, 2016)

Pawlowski v. United Tranzactions, LLC, C.A. no. 15-cv-2330, (E.D. PA, April 18, 2016)

Rodriguez v. Calvin Klein, Inc., C.A. 1:15-cv-02590 (S.D. N.Y. 2015)

Giddiens v. Infinity Staffing, C.A. No. 13-cv-07115, (E.D. Pa., Jan. 12, 2016)

Giddiens v. First Advantage, C.A. No. 14-cv-5105, (E.D. Pa., July 11, 2015)

Jones v. Halstead Management Corporation, C.A. No. 14-cv-03125 (S.D. N.Y., May 5, 2016)

Berry v. LexisNexis Risk & Info. Analytics Group, Inc., No. 3:11-cv-754, 2014 WL 4403524 (E.D. Va. Sept. 5, 2014)

Thomas v. BackgroundChecks.com, C.A. No. 13-029 2015 WL 11004870 (E.D. Va. Aug. 5, 2015)

Henderson v. Acxiom Risk Mitigation, Inc., C.A. No. 12-589 (E.D. Va., Aug. 7, 2015)

Magallon v. Robert Half International, Inc. WL 8778398 (D. Or. Nov. 10, 2015)

Carter v. McDonald's Restaurants, 15-01531-MWF (March 15, 2015)

Patel v. Trans Union, LLC, 308 F.R.D. 292 (N.D. Cal. 2014)

Goode v. First Advantage LNS Screening Sols., Inc., No. 11-cv-02950 (E.D. Pa. Dec. 29, 2014)

Blandina v. Midland Funding, LLC, 2014 WL 7338744 (E.D. Pa. Dec. 23, 2014)

King v. General Information Services, Inc., C.A. No. 11-06850 (E.D. Pa. Nov. 4, 2014)
Robinson v. General Information Services, Inc., C.A. No. 11-07782 (E.D. Pa. Nov. 4, 2014)
Ramirez v. Trans Union, LLC, 2014 WL 3734525 (N.D. Cal. July 24, 2014)
White v. Experian Information Solutions, 993 F. Supp. 2d 1154, 1172 (C.D. Ca. 2014)
Sapp v. Experian Information Solutions, Inc., 2:10-04312 (E.D. Pa. Jan. 29, 2013)
LaRocque v. TRS Recovery Services, Inc., 2012 WL 291191 (D. Me. July 17, 2012)
Ryals et al. v. Hireright Solutions, Inc., C.A. No. 3:09-625 (E.D. Va. July 7, 2011)
Serrano v. Sterling Testing Systems, Inc., 711 F. Supp. 2d 402 (E.D. Pa. 2010)
Summerfield v. Equifax Information Services, LCC, 264 F.R.D. 133 (D. N.J. 2009)
Chakejian v. Equifax Information Services, LLC, 256 F.R.D. 492 (E.D. Pa. 2009)
Jones v. Midland Funding, LLC, C.A. No. 3:08-802 (RNC) (D. Conn. October 13, 2009)
Barel v. Bank of America, 255 F.R.D. 393 (E.D. Pa. 2009)
Mann v. Verizon, C.A. No. 06-5370 (E.D. Pa. Sept. 26, 2008)
Smith v. Grayling Corp., 2008 WL 3861286, C.A. No. 07-1905 (E.D. Pa. 2008)
Strausser v. ACB Receivables Management, Inc., 2008 WL 859224 (E.D. Pa. March 28, 2008)
Nienaber v. Citibank (South Dakota), N.A., 2007 WL 2003761 (D.S.D. July 5, 2007)
Jordan v. Commonwealth Financial Systems, Inc., 237 F.R.D. 132, (E.D. Pa. 2006)
Marino v. UDR, 2006 WL 1687026, C.A. No. 05-2268 (E.D. Pa. June 14, 2006)
Seawell v. Universal Fidelity Corp, 235 F.R.D. 64 (E.D. Pa. 2006)
Perry v. FleetBoston Financial Corp., 229 F.R.D.105 (E.D. Pa. 2005)
Beck v. Maximus, Inc., 2005 WL 589749 (E.D. Pa. 2005)
Beck v. Maximus, 457 F. 3d 291, 2006 WL 2193603 (3d Cir. Aug. 4, 2006)
Stoner v. CBA Information Services, 352 F. Supp. 2d 549 (E.D. Pa. 2005)
Bittner v. Trans Union, LLC, C.A. No. 04-2562 (E.D. Pa. January 4, 2005)
Wisneski v. Nationwide Collections, Inc., 227 F.R.D. 259 (E.D. Pa. 2004)
Petrolito v. Arrow Financial Services, LLC, 221 F.R.D. 303 (D. Conn. 2004)
Orloff v. Syndicated Office Systems, Inc., 2004 WL 870691 (E.D. Pa 2004)
Bonett v. Education Debt Services, Inc., 2003 WL 21658267 (E.D. Pa. 2003)
Gaumer v. The Bon-Ton Stores, C.A. No. 02-8611 (E.D. Pa. Dec. 30, 2003)
Street v. Portfolio Recovery Associates, C.A. No. 01-3684 (E.D. Pa. July 30, 2003)
Samuel-Bassett v. Kia Motors America, Inc., 212 F.R.D. 271 (E.D. Pa. 2000)
Oslan v. Law Offices of Mitchell N. Kay, 232 F. Supp. 2d 436 (E.D. Pa. 2002)
Oslan v. Collection Bureau of Hudson Valley, 206 F.R.D. 109 (E.D. Pa. 2002)
Saunders v. Berks Credit & Collections, 2002 WL 1497374 (E.D. Pa. 2002)
Schilling v. Let's Talk Cellular and Wireless, 2002 U.S. Dist. LEXIS 3352 (E.D. Pa. 2002)
Fry v. Hayt, Hayt and Landau, 198 F.R.D. 461 (E.D. Pa. 2000)

Smith v. First Union Mortgage Corporation, 1999 WL 509967 (E.D. Pa. 1999)

Miller v. Inovision, December Term, 1999, No. 3504 (C.P. Phila. County).

LECTURES/PRESENTATIONS BY INVITATION

Speaker, *Rule 23(c)(5) Subclasses: Certification, Due Process, Adequate Representation, and Settlement*, Strafford Webinars, February 23, 2023

Speaker, *Data Protection at the Federal Level*, Nevada Bar Association, January 17, 2023

Speaker, *27th Annual Consumer Financial Services Institute*, Practising Law Institute, *Debt Collection and Credit Reporting Update*, December 7, 2022, San Francisco, CA

Speaker, *Tenant Screening Litigation: FCRA and Civil Rights Claims*, National Consumer Law Center, Consumer Rights Litigation Conference, November 10, 2022, Seattle, WA

Speaker “Lightning Round-Ascertainability”, Consumer Class Action Symposium, National Consumer Law Center, November 13, 2022, Seattle, WA

Speaker, *27th Annual Consumer Financial Services Institute*, Practising Law Institute, *Debt Collection and Credit Reporting Update*, September 20, 2022, Chicago, IL

Speaker, *Representing the Pro Bono Client: Consumer Law Basics*, Practising Law Institute, August 12, 2022

Speaker, *Perrin Conferences Class Action Litigation Virtual Conference*, April 26, 2022

Speaker, *Introduction to Standing in Federal FDCPA Litigation*, 2022 Fair Debt Conference, National Consumer Law Center, April 25th, 2022, Orlando, FL

Speaker, *27th Annual Consumer Financial Services Institute- Debt Collection and Credit Reporting Update*, Practising Law Institute, March 18, 2022, New York, NY

Speaker, *Consumer Finance Class Actions: FDCPA, FCRA & TCPA Webinar*, Strafford, September 16, 2020

Faculty, *Introduction to the Fair Credit Reporting Act, Representing the Pro Bono Client: Consumer Law Basics 2020*, Practising Law Institute, August 14, 2020, San Francisco, CA

Faculty, *Representing the Pro Bono Client: Consumer Law Basics 2019*, Practising Law Institute;

Faculty, *Consumer Financial Services & Banking Law Update*, Pennsylvania Bar Institute, October 29, 2019;

Faculty, *Consumer Finance Class Actions*, The Canadian Institute, July 24, 2019;

Faculty, *Representing the Pro Bono Client: Consumer Law Basics 2019*, Practising Law Institute;

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Long Beach, CA, May 1–4, 2019;

Faculty, *Judicial Scrutiny of Class Action Settlements: New Standards and Ensuring Timely Release of Attorneys’ Fees*, Strafford Webinars and Publications, Tuesday, October 9, 2018;

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Baltimore, MD, April 22-29, 2017;

Faculty, 21st Annual Consumer Financial Services Litigation Institute (CLE-accredited), "Fair Credit Reporting and Debt Collection Litigation", March and April 2016, NYC and Chicago;

Speaker, The Conference on Consumer Finance Law, Annual Consumer Financial Services Conference, Loyola University School of Law, Chicago, Illinois, September 16, 2016;

Speaker, "New Frontiers: FCRA Litigation Against Lesser Known CRAs", Consumer Rights Litigation Conference, National Consumer Law Center, Anaheim, California, October 2016;

Faculty, "Pursuing and Defending FDCPA, FCRA and TCPA Claims", Consumer Finance Class Actions, Strafford Publications, June 2, 2016;

Speaker, "Stump the Champs", Consumer Rights Litigation Conference, National Consumer Law Center, San Antonio, Texas, October 2015;

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Las Vegas, NV May 1–3, 2015;

Co-Chair and Speaker, NACA 2013 FCRA Conference, National Association of Consumer Advocates, May 29 – June 1, 2013;

Presenter, *Beyond E-Oscar: Litigating "Non-Credit" FCRA Cases*, Webinar, National Association of Consumer Advocates, February 27, 2013;

Faculty, *FDCPA Class Actions: Latest Litigation Developments*, Strafford Webinars and Publications, November 8, 2012;

Speaker, Consumer Finance Class Actions: *FCRA and FACTA: Leveraging New Developments in Certification, Damages and Preemption*, Strafford Webinars and Publications, March 21, 2012;

Speaker, *FCRA Developments*, Consumer Rights Litigation Conference, National Consumer Law Center, Seattle, Washington, October 2012;

Speaker, *11th Consumer Class Action Symposium*, National Consumer Law Center, Chicago, Illinois, November 6, 2011;

Speaker, *Tenant, Employment and Chexsystems Reports*, Consumer Rights Litigation Conference, National Consumer Law Center, Chicago, Illinois, November 3 – 6, 2011;

Speaker, *Specialty Consumer Reports and the FCRA*, FCRA Conference on Consumer Credit, National Association of Consumer Advocates, Memphis, Tennessee, May 20 – 22, 2011;

Panelist, *Taking on the Challenges Facing Workers with Criminal Records: Advancing the Legal and Policy Advocacy Agenda*, National Employment Law Project, Washington, D.C., April 5, 2011;

Faculty, 16th Annual Consumer Financial Services Litigation Institute (CLE-accredited), *Collection Issues Including The TCPA & Hot Topics*, Practising Law Institute, New York, NY and Chicago, IL, March 2011;

Speaker, *ABCs of Fair Credit Reporting, Tips on FCRA Depositions, Evolution of Credit Reporting Industries*, Consumer Rights Litigation Conference, National Consumer Law Center, Boston, Massachusetts, November 11 – 14, 2010;

Faculty, Banking and Consumer Financial Services Law Update, *Litigation and Arbitration Update*, Pennsylvania Bar Institute, April 14, 2010;

Faculty, *Deposit-Side Litigation Developments & Credit Card Developments*, 14th Annual Consumer Financial Services Litigation Institute, New York, NY and Chicago, IL, March and April 2009;

Faculty, 13th Annual Consumer Financial Services Litigation Institute (CLE-accredited), Practicing Law Institute, New York, NY and Chicago, IL, January 2008, March 2008;

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Chicago, IL May 8 – 10, 2009;

Faculty, 12th Annual Consumer Financial Services Litigation Institute (CLE-accredited), Practicing Law Institute, New York, NY, March 2007;

Faculty, *Fair Credit Reporting Litigation*, Consumer Protection Law (CLE-accredited), Pennsylvania Bar Institute, Philadelphia, PA and Mechanicsburg, PA, December 2004, March 2007;

Speaker, *Litigating Accuracy Issues with Furnishers of Credit Data*, National Association of Consumer Advocates, New Orleans, LA, June 2 – 5, 2005;

Speaker, Philadelphia Housing Expo, Homeownership Counseling Association of the Delaware Valley, 2005 and 2006;

Speaker, *Understanding Credit Scoring*, Consumer Rights Litigation Conference, National Consumer Law Center, Boston, MA, November 7, 2004;

Speaker, *Litigating Accuracy Issues With Credit Reporting Agencies*, National Association of Consumer Advocates, Chicago, Ill., May 14 – 16, 2004;

Speaker, *Protecting Privacy, Ensuring Accuracy*, National Association of Consumer Advocates, Albuquerque, NM, June 1, 2002;

Faculty/Speaker, *Credit Reporting and Debt Collection Litigation*, Municipal Court Judicial Conference (CLE), Pennsylvania, PA, May 6, 1999;

Speaker, The People's Law School, Philadelphia Bar Association, Philadelphia, PA, October 2004;

Guest Lecturer, Consumer Protection Law, Temple Law School, 2003 – 2012;

Guest Lecturer, Consumer Protection Law, Widener Law School, 2004 – 2009.

PUBLICATIONS

The FCRA: A Double-Edged Sword for Consumer Data Sellers,
GP SOLO Magazine, American Bar Association, Volume 29, Number 6,
November/December 2012

Credit Rating Damage: Compensable, Yet Overlooked Damage in Tort Cases,

The Verdict, Philadelphia Trial Lawyers Association, Volume 2008-2009, Issue 6 (2009).

APPOINTMENTS, POSITIONS & MEMBERSHIPS

- Editorial Board of the Consumer Financial Services Law Report
- Philadelphia Bar Association's Lawyer Referral and Information Service Committee (chair or co-chair for 3 years)
- Philadelphia Bar Association's Federal Court's Committee.
- Arbitrator for the Court of Common Pleas of Philadelphia County
- Court of Common Pleas of Philadelphia County, Judge Pro Tem panel.

PERSONAL

Born: June 17, 1970, Philadelphia, Pennsylvania
Family: Two Children, Shayna and Noah

MARK D. MAILMAN

MARK D. MAILMAN, Managing Shareholder and one of the firm's founders, is a tenacious and passionate consumer litigator who has for more than 24 years help secure over \$300 million dollars in verdicts and settlements on behalf of more than 8,000 victimized consumers across the nation. Mark concentrates his practice primarily in federal courts, in the areas of Fair Debt Collection, Fair Credit Reporting, False Employment/Background Checks, Identity Theft, Unwanted Auto Calls and Texts, and Consumer Class Actions.

In October 2018, Mark was awarded the 2018 Consumer Attorney of the Year award from the National Association of Consumer Advocates (NACA). NACA is a nationwide organization of more than 1,500 consumer attorneys and advocates who represent the victims of abusive and fraudulent business practices. He has been consistently voted and named one of Pennsylvania's Super Lawyers by Law and Politics published by Philadelphia Magazine and Pennsylvania Super Lawyer Magazine from 2004 to the Present. Mark has repeatedly lectured before judges, lawyers and various professional organizations on the topics of Fair Debt Collection and Fair Credit Reporting litigation and has also appeared on various news programs to discuss trending consumer issues

Mark is a graduate of Muhlenberg College (B.A. magna cum laude, 1991), where he was also inducted into Phi Beta Kappa. He received his law degree from the Temple University School of Law (J.D., 1995). While at Temple Law School, he achieved the highest grade in his Trial Advocacy clinic.

Mark is admitted to practice before the United States for the Eastern District of Pennsylvania, Middle District of Pennsylvania, Eastern District of Arkansas, District of North Dakota, and District of New Jersey as well as the state courts of Pennsylvania and New Jersey. He has also successfully litigated cases across the country on a pro hac basis. Mark has been certified to serve as class counsel by state and federal courts in both contested and settlement class actions.

CLASS COUNSEL CERTIFICATIONS

Martinez v. Avantus, LLC, No. 3:20-CV-1772 (JCH), 2023 WL 112807 (D. Conn. Jan. 5, 2023)
Stewart et al v. LexisNexis Risk Data Retrieval Services, LLC et al., No. 3:20-cv-00903-JAG (E.D. Va. July 27, 2022)
Healy v. Milliman, Inc., No. 2:20-cv-01473-JCC (W.D. Wash. 2022)
Kang v. Credit Bureau Connection, Inc., No. 18-01359, 2022 WL 658105 (E.D. Cal. Mar. 4, 2022)
Watson v. Checkr, Inc., No. 3:19-cv-03396-EMC (N.D. Cal. 2021)
Deaton v. Trans Union, LLC, No. 2:20-cv-01380-AB (E.D. Pa. 2021)
Sanders v. Makespace Labs, Inc., No: 1:18-cv-10016 (S.D.N.Y. Mar. 29, 2021)
Der-Hacopian v. Darktrace, Inc., No: 18-cv-06726-HSG (N.D. Cal. Dec. 10, 2020)
Der-Hacopian v. Sentrylink, LLC, No. 8:18-cv-03001-PWG (N.D. Cal. Nov. 23, 2020)
McIntyre v. RealPage, Inc., No: 2:18-cv-03934, WL 5017612 (E.D. Pa. Aug. 25, 2020)
Norman v. Trans Union, LLC, No: 18-5225, 2020 WL 4735538 (E.D. Pa. Aug. 14, 2020)
Robinson v. National Student Clearinghouse, No. 1-19-cv-10749, 2020 WL 4873728 (D. Mass. July 8, 2020) *aff'd* 14 F.4th 56 (1st Cir. 2021)
Leo v. Appfolio, Inc., No.3:17-cv-05771-RJB (W.D. Wash. 2019)
Thomas v. Equifax Info. Services, LLC, No. 18-cv-684 (E.D. Va. 2020)
Clark v. Experian Info. Sols., Inc., No. 16-cv-32 (E.D. Va. 2019)
Clark/Anderson v. Trans Union, LLC, No. 15-cv-391 & No. 16-cv-558 (E.D. Va. 2018)
Gibbons v. Weltman, Weinberg & Reis Co., LPA, 2018 WL 5720749 (E.D. Pa. Oct. 31, 2018)
Kelly v. Business Information Group, C.A. 15-6668, 2019 WL 414915 (E.D. Pa. 2019)
Ridenour v. Multi-Color Corporation, C.A. No. 2:15-cv-00041, (E.D. Va., Jan. 13, 2017)
Flores v. Express Personnel, C.A. No. 14-cv-03298, (E.D. Pa. Oct. 21, 2016)
Larson v. Trans Union, LLC, C.A. No. 12-cv-05726, (N.D. CA, Aug. 11, 2016)
Miller v. Trans Union, LLC, C.A. No. 12-cv-1715, (M.D. PA, Dec. 26, 2016)
Henderson v. Trans Union, LLC, C.A. No. 14-cv-00679, E.D. Va., May 3, 2016)
Pawlowski v. United Tranzactions, LLC, C.A. no. 15-cv-2330, (E.D. PA, April 18, 2016)
Rodriguez v. Calvin Klein, Inc., C.A. 1:15-cv-02590 (S.D. N.Y. 2015)
Giddiens v. Infinity Staffing, C.A. No. 13-cv-07115, (E.D. Pa., Jan. 12, 2016)
Giddiens v. First Advantage, C.A. No. 14-cv-5105, (E.D. Pa., July 11, 2015)
Jones v. Halstead Management Corporation, C.A. No. 14-cv-03125 (S.D. N.Y., May 5, 2016)
Berry v. LexisNexis Risk & Info. Analytics Group, Inc., No. 3:11-cv-754, 2014 WL 4403524 (E.D. Va. Sept. 5, 2014)
Thomas v. BackgroundChecks.com, C.A. No. 13-029 2015 WL 11004870 (E.D. Va. Aug. 5, 2015)

Henderson v. Acxiom Risk Mitigation, Inc., C.A. No. 12-589 (E.D. Va., Aug. 7, 2015)
Magallon v. Robert Half International, Inc. WL 8778398 (D. Or. Nov. 10, 2015)
Carter v. McDonald's Restaurants, 15-01531-MWF (March 15, 2015)
Patel v. Trans Union, LLC, 308 F.R.D. 292 (N.D. Cal. 2014)
Goode v. First Advantage LNS Screening Sols., Inc., No. 11-cv-02950 (E.D. Pa. Dec. 29, 2014)
Blandina v. Midland Funding, LLC, 2014 WL 7338744 (E.D. Pa. Dec. 23, 2014)
King v. General Information Services, Inc., C.A. No. 11-06850 (E.D. Pa. Nov. 4, 2014)
Robinson v. General Information Services, Inc., C.A. No. 11-07782 (E.D. Pa. Nov. 4, 2014)
Ramirez v. Trans Union, LLC, 2014 WL 3734525 (N.D. Cal. July 24, 2014)
White v. Experian Information Solutions, 993 F. Supp. 2d 1154, 1172 (C.D. Ca. 2014)
Sapp v. Experian Information Solutions, Inc., 2:10-04312 (E.D. Pa. Jan. 29, 2013)
LaRocque v. TRS Recovery Services, Inc., 2012 WL 291191 (D. Me. July 17, 2012)
Ryals et al. v. Hireright Solutions, Inc., C.A. No. 3:09-625 (E.D. Va. July 7, 2011)
Serrano v. Sterling Testing Systems, Inc., 711 F. Supp. 2d 402 (E.D. Pa. 2010)
Summerfield v. Equifax Info. Services, LCC, 2009 WL 3234191 (D. N.J. Sept. 30, 2009)
Chakejian v. Equifax Info. Services, LLC, 256 F.R.D. 492, 2009 WL 764656 (E.D. Pa. 2009)
Barel v. Bank of America, __ F.R.D. __, 2009 WL 122805 (E.D. Pa. 2009)
Mann v. Verizon, C.A. No. 06-5370 (E.D. Pa. Sept. 26, 2008)
Smith v. Grayling Corp., 2008 WL 3861286, C.A. No. 07-1905 (E.D. Pa. 2008)
Strausser v. ACB Receivables Management, Inc., 2008 WL 859224 (E.D. Pa., March 28, 2008)
Nienaber v. Citibank (South Dakota), N.A., 2007 WL 2003761 (D.S.D., July 5, 2007)
Jordan v. Commonwealth Financial Sys., Inc., 237 F.R.D. 132, 2006 WL 2294855 (E.D. Pa. 2006)
Seawell v. Universal Fidelity Corp., 235 F.R.D. 64 (E.D. Pa. 2006)
Perry v. FleetBoston Financial Corp., 299 F.R.D. 105, 2005 WL 1527694 (E.D. Pa. 2005)
Beck v. Maximus, Inc., 2005 WL 589749 (E.D. Pa. 2005); *vacated on other grounds*, *Beck v. Maximus*, 457 F. 3d 291, 2006 WL 2193603 (3d. Cir. Aug. 4, 2006)
Stoner v. CBA Information Services, 352 F. Supp. 2d 549 (E.D. Pa. 2005)
Bittner v. Trans Union, LLC, C.A. No. 04-2562 (E.D. Pa. January 4, 2005)
Wisneski v. Nationwide Collections, Inc., 227 F.R.D. 259 (E.D. Pa. 2004)
Petrolito v. Arrow Financial Services, LLC, 221 F.R.D. 303 (D. Conn. 2004)
Orloff v. Syndicated Office Systems, Inc., 2004 WL 870691 (E.D. Pa. 2004)
Bonett v. Education Debt Services, Inc., 2003 WL 21658267 (E.D. Pa. 2003)
Gaumer v. The Bon-Ton Stores, C.A. No. 02-8611 (E.D. Pa. Dec. 30, 2003)
Street v. Portfolio Recovery Associates, C.A. No. 01-3684 (E.D. Pa. July 30, 2003)

Samuel-Bassett v. Kia Motors America, Inc., 212 F.R.D. 271 (E.D. Pa. 2000), *vacated on other grounds*

Oslan v. Law Offices of Mitchell N. Kay, 232 F. Supp. 2d 436 (E.D. Pa. 2002)

Oslan v. Collection Bureau of Hudson Valley, 206 F.R.D. 109 (E.D. Pa. 2002)

Saunders v. Berks Credit & Collections, 2002 WL 1497374 (E.D. Pa. 2002)

Schilling v. Let's Talk Cellular and Wireless, 2002 U.S. Dist. LEXIS 3352 (E.D. Pa. 2002)

Fry v. Hayt, Hayt and Landau, 198 F.R.D. 461 (E.D. Pa. 2000)

Smith v. First Union Mortgage Corporation, 1999 WL 509967 (E.D. Pa. 1999)

Miller v. Inovision, C.P. Phila. County, December Term, 1999, No. 3504

NOTABLE CASES

- *Schwartz v. Aracor Search & Abstract, Inc.*, 2014 WL 4493662 (E.D. Pa. Sept. 11, 2014) (upholding compensatory and punitive damages judgment against title company that misappropriated certain funds at real estate closing)
- *Ferguson v. Wells Fargo Bank, NA*, 538 Fed. Appx. 782 (9th Cir. 2013) (reversing summary judgment for bank that failed to properly remove bankruptcy notation)
- *King v. General Info. Servs., Inc.*, 903 F. Supp. 2d 303 (E.D. Pa. 2012) (first court to uphold constitutionality of FCRA's obsolescence provision)
- *Seamans v. Temple University*, Civil No. 11-6774 (E.D. Pa., Oct. 28, 2011) — precedential case of first impression before U.S. Court of Appeals for the Third Circuit addressing duties of furnishers and interplay between the FCRA and HCA.
- *Adams v. LexisNexis Risk & Info. Analytics Group, Inc.*, 2010 WL 1931135 (D.N.J. May 12, 2010) (first court to find that consumers may sue under FRCA over information in specialty Accurant report used by debt collectors)
- *Dixon-Rollins v. Trans Union, LLC*, Civil No. 09-646 (E.D. Pa., April 10, 2010) — \$530,000 jury verdict against a credit reporting agency that falsely reported an old landlord collection claim for rent (remitted to \$300,000)
- *Shames-Yeakel v. Citizens Financial Bank*, 677 F. Supp. 2d 994 (N.D. Ill. 2009) (first court to rule that consumer may proceed to jury trial on claim that bank breached its duty to sufficiently secure its online banking system).
- *Cortez v. Trans Union, LLC*, Civil No. 05-5684 (E.D. Pa., April 26, 2007)—\$800,000 jury verdict against Trans Union in fair credit reporting case (remitted to \$150,000)
- *Samuel-Bassett v. Kia Motors America, Inc.*, C.P. Phila. County, January Term, 2001, No. 2199—5.6 million dollar verdict for class of Pennsylvania car purchasers
- *Little v. Kia Motors America, Inc.*, 2003 WL 25568765 (N.J.Super.L. 2003)—6 million dollar (approximate) verdict for class of New Jersey car purchasers, damages later decertified

- *Serrano v. Sterling Testing Systems, Inc.*, —F.Supp.2d—, 2008 WL 2223007 (E.D. Pa. May 30, 2008)—federal court finding as a matter of first impression what defines a record of arrest under the FCRA
- *Stoner v. CBA Information Services*, 352 F. Supp. 2d 549 (E.D. Pa. 2005)—obtained \$772,500 settlement for class of consumers who disputed errors in their credit reports
- *Perry v. FleetBoston Financial Corp.*, 2004 WL 1508518 (E.D. Pa. 2004)—defeated motion to compel arbitration in class action brought under Fair Credit Reporting Act
- *Crane v. Trans Union, LLC*, 282 F. Supp. 2d 311 (E.D. Pa. 2003)—federal court held that credit reporting agencies that merely parrot information from credit furnishers and fail to forward dispute documentation face claims for punitive damages under the Fair Credit Reporting Act; violation of the Fair Credit Reporting Act presents a violation of Pennsylvania’s Consumer Protection Law); *Lawrence v. Trans Union, LLC*, 296 F. Supp. 2d 582 (E.D. Pa. 2003)—same
- *Wisneski v. Nationwide Collections, Inc.*, 227 F.R.D. 259 (E.D. Pa. 2004)—in fair debt class action, Pennsylvania federal court held for the first time that statutory net worth limitation is not limited to balance sheet net worth, and includes equity, capital stock and goodwill
- *Evantash v. G.E. Capital Mortgage Services, Inc.*, 2003 WL 22844198 (E.D. Pa. 2003)—in fair credit reporting case, court held that technical accuracy is not a defense
- *Sheffer v. Experian Information Solutions, Inc.*, 2003 WL 21710573 (E.D. Pa. 2003)—federal court held that Fair Credit Reporting Act permits as recoverable damage emotional distress in trying to correct errors in a consumer’s credit file, even where no pecuniary or out-of-pocket losses
- *Sheffer v. Experian Information Solutions Inc.*, 249 F. Supp. 2d 560 (E.D. Pa. 2003)—federal court held that FCRA provides a private right of action against furnishers of information
- *Sullivan v. Equifax, Inc. et al.*, 2002 U.S. Dist. LEXIS 7884 (E.D. Pa. 2002)—federal court held that reporting a debt to a credit reporting agency is a communication covered by the Fair Debt Collection Practices Act
- *Wenrich v. Cole*, 2000 U.S. Dist. LEXIS 18687 (E.D. Pa. 2000)—federal court held that FDCPA provides protection for all persons, not just consumers
- *Jaramillo v. Experian Information Solutions, Inc.*, 155 F. Supp. 2d 356 (E.D. Pa. 2001); 2001 U.S. Dist. LEXIS 10221 (E.D. Pa. 2001)—federal court held that single publication rule does not apply to actions brought for violation of the Fair Credit Reporting Act

PRESENTATIONS/LECTURES BY INVITATION

Speaker, *Spring Training 2023 (FCRA)*, National Association of Consumer Advocates, New Orleans, LA, May 3-5, 2023

Speaker, *Spring Training 2022 (FCRA)*, National Association of Consumer Advocates, Phoenix, AZ, May 11-14, 2022

Speaker, *Consumer Rights Litigation Conference*, National Consumer Law Center's Office Hours with the FCRA Stars, December 6-17, 2021

Speaker, *Spring Training 2020 (FCRA)*, National Association of Consumer Advocates, Online Webinars, May 1-June 30, 2020

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Long Beach, CA, May 1-4, 2019

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Baltimore, MD, April 22-29, 2017

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Las Vegas, NV, May 1-3, 2015

Speaker, *Fair Debt Collection Experienced Training Conference*, National Association of Consumer Advocates, Baltimore, MD, March 7-8, 2013

Speaker, *Fair Debt Collection Experienced Training Conference*, National Association of Consumer Advocates, New Orleans, LA, February 23-24, 2012

Speaker, *Negotiating 101*, National Association of Consumer Advocates, Memphis, TN, May 20-22, 2011

Speaker, *Fair Credit Reporting Act Conference*, National Association of Consumer Advocates, Chicago, IL, May 8-10, 2009

Speaker, *Fair Debt Collection Experienced Training Conference*, National Association of Consumer Advocates, Nashville, TN, March 27-29, 2008

Speaker, *Litigation Trends: "Getting to Know the Other Team"*, 11th Annual DBA International World Championship of Debt Buying, Las Vegas, NV, February 5-7, 2008

Speaker, *Protecting Vulnerable Consumers and Promoting Marketplace Justice*, Consumer Rights Litigation Conference, National Consumer Law Center, Miami, FL, November 10-13, 2006

Speaker, *FCRA: Playing to Win*, National Association of Consumer Advocates, Las Vegas, NV, May 5-7, 2006

Speaker, *Litigating Accuracy Issues With Furnishers of Credit Data*, National Association of Consumer Advocates, New Orleans, LA, June 2-5, 2005

Speaker, *Understanding Credit Scoring*, Consumer Rights Litigation Conference, National Consumer Law Center, Boston, MA, November 7, 2004

Speaker, *Litigating Accuracy Issues With Credit Reporting Agencies*, National Association of Consumer Advocates, Chicago, Ill., May 14-16, 2004

Speaker, *FCRA/Building On Our Success*, National Association of Consumer Advocates, Orlando, FL, March 7-9, 2003

Speaker, *Protecting Privacy, Ensuring Accuracy*, National Association of Consumer Advocates, Albuquerque, NM, June 1, 2002

Faculty/Speaker, *Credit Reporting and Debt Collection Litigation*, Municipal Court Judicial Conference (CLE), Pennsylvania, PA, May 6, 1999

PUBLICATIONS

CFPB Reminds Consumer Reporting Agencies to Toss 'Junk Data' in the Trash, 266 The Legal Intelligencer, 5, 8 (2022)

Your Clients' Consumer Rights Legal Issues May Be Hiding in Plain Sight, 264 The Legal Intelligencer, 7-8 (2021)

COMMITTEE APPOINTMENTS AND POSITIONS

Mark regularly lectures for continuing legal education programs, law schools and community groups throughout the country, and has been a regular speaker for the National Association of Consumer Advocates (NACA) and National Consumer Law Center (NCLC) for over 20 years. He is a certified arbitration panelist with the Federal Arbitration Panel and serves on the Editorial Board of the Consumer Financial Services Law Report. Additionally, Mark is a member of the Pennsylvania Trial Lawyers Association, Philadelphia Trial Lawyers Association, Philadelphia Bar Association, and National Association of Consumer Advocates, and regularly serves on the Philadelphia Bar Association's Federal Courts Committee.

JOHN SOUMILAS

JOHN SOUMILAS is a firm shareholder resident in Philadelphia. A seasoned litigator, John has represented thousands of consumers in individual cases and class actions. He currently represents persons defamed and otherwise harmed by credit and background screening errors, victims of identity theft, individuals harassed and deceived by collectors and other businesses, as well as consumers who are subjected to unwelcome invasions of their privacy, fraud, overcharging, and other deceptive or unfair trade practices.

John has been repeatedly recognized by Philadelphia Magazine as a "SuperLawyer," a recognition received by only 5% of attorneys in Pennsylvania. He has been nationally recognized for his work in protecting consumer rights under the federal Fair Credit Reporting Act (FCRA). Throughout his career, John has obtained some of the highest consumer jury verdicts, including the highest known FCRA verdicts in Pennsylvania, California, and Michigan, and had been appointed by federal judges as class counsel in some of the largest FCRA class cases and settlements.

John lives in Old City Philadelphia with his wife and children. John is a 1994 *cum laude* graduate of Rutgers University, where he was inducted into Phi Beta Kappa. He also holds a master's degree in American history from Stony Brook University, obtained in 1996. John received his law degree *cum laude* from the Temple University Beasley School of Law in 1999, where he was a member of the Temple Law Review. He began his legal career by clerking for Justice Russell M. Nigro of the Supreme Court of Pennsylvania.

ADMISSIONS

John has been admitted to practice before the United States Supreme Court, United States Courts of Appeals for the First, Second, Third, Fourth, Sixth, Seventh, Ninth and Eleventh Circuits,

the United States District Courts for the District of Colorado, Eastern District of Michigan, Eastern District of Pennsylvania, and the District of New Jersey, as well as the state courts of Pennsylvania and New Jersey. He has also successfully litigated cases on a *pro hac vice* basis throughout the country.

RECENT WORK

John is known for his ability to tackle a wide array of novel and complex legal problems. A sampling of his recent cases is set forth below:

False Terrorist Alerts on Credit Reports

- *Kang v. Credit Bureau Connection, Inc.*, No. 18-01359, 2022 WL 658105 (E.D. Cal. Mar. 4, 2022) (certified class of car buyers in case involving the reporting of inaccurate OFAC “terrorist” alerts appearing on the credit reports of innocent American consumers) (also appointed class counsel and represented classes of similar consumers for false OFAC alert claims in *Patel v. Trans Union, LLC*, 308 F.R.D. 292 (N.D. Cal. 2015) and *Ramirez v. Trans Union, LLC*, 301 F.R.D. 408 (N.D. Cal. 2014); *see also Ramirez v. Trans Union LLC*, 951 F.3d 1008 (9th Cir. 2020) (upholding certification of entire class, but reversed for portion of class that lacked Article III standing per *Trans Union LLC v. Ramirez*, 141 S. Ct. 2190 (2021)).

Unlawful College Charges and Student Loans

- *Teran v. Navient Sols. (In re Teran)*, No. 10-31718, 2022 Bankr. LEXIS 381 (Bankr. N.D. Cal. Feb. 15, 2022) (summary judgment ruling siding with class of student debtors who had collection efforts taken against them even though certain of their student loans were discharged in their bankruptcies);
- *Weiman v. Miami Univ.*, Case Nos. 2020-00614JD, 2020-00644JD (OH Ct. of Claims, Dec. 13, 2021) (certifying class of students seeking Covid-19 related refunds from university following campus shutdown due to pandemic) and *Botts v. Johns Hopkins Univ.*, No. 20-1335, 2021 WL 1561520 (D. Md. Apr. 21, 2021) (leading decision in litigation against universities for class of undergraduate and graduate students claiming overcharging during the Covid-19 pandemic, upholding breach of contract and unjust enrichment claims).

Negligent Recalls of Defective Products

- *Dukich v. IKEA US Retail LLC*, No. 20-2182, 2021 WL 1534520 (E.D. Pa. Apr. 19, 2021) (recognizing negligent recall theory in class case involving the recall of tens of millions of defective dressers which can tip over and injure or kill small children).

Credit Reporting Errors and Problems

- *Norman v. Trans Union, LLC*, 479 F.Supp.3d 98 (E.D. Pa. Aug. 14, 2020) (first court to certify class action for credit report agency’s failure to investigate hundreds of thousands of consumer disputes of certain inquiries disputed as unauthorized); followed by *Rivera v. Equifax Info. Servs., LLC*, 341 F.R.D. 328 (N.D. Ga. 2022) (certifying even larger class of over 300,000 consumers for same claim).

Tenant and Employment Screening Violations

- *McIntyre v. RealPage, Inc.*, 336 F.R.D. 422 (E.D. Pa. Aug. 25, 2020) (certifying claim on behalf of tenant applicants for improper reporting of stale eviction records against them in largest tenant screening class to date);
- *Kelly v. Business Information Group*, No. 15-6668, 2019 WL 414915 (E.D. Pa. Feb. 1, 2019) (as part of approval of multi-million-dollar class settlement requiring employment background screener to provide important “same time” notice to job candidates of any adverse information being included in their background reports);
- *Leo v. AppFolio, Inc.*, No. 17-5771, 2018 WL 623647 (W.D. Wash. Jan. 30, 2018) (upholding class action claims against start-up tenant screening company);
- *Flores v. Express Personnel*, No. 14-03298, 2017 WL 1177098 (E.D. Pa. Mar. 30, 2017) (certifying settlement class regarding improper background screening practices by a job placement agency).

NOTEWORTHY CASES

Throughout his career, John has litigated some of the most groundbreaking consumer rights cases including several cases involving issues of first impression. The following is a list of cases involving complex and novel issues that John had litigated through the years:

- *Clark v. Trans Union, LLC*, No. 15-391, 2017 WL 814252 (E.D. Va. Mar. 1, 2017) (certifying one of first misreported public records FCRA classes);
- *Magallon v. Robert Half International, Inc.*, 311 F.R.D. 626 (D. Or. Nov. 10, 2015) (one of few cases certifying a 5-year FCRA class on contest for failure to timely disclose adverse temp-placement decisions against job placement agency);
- *Seamans v. Temple University*, 744 F.3d 853 (3d Cir. 2014) (reversing summary judgment for credit furnisher concerning improperly reported old student loan debt, and setting standard for certain delinquent student debt cannot be reported to the credit agencies after seven-and-a-half years);
- *Schwartz v. Aracor Search & Abstract, Inc.*, No. 13–870, 2014 WL 4493662 (E.D. Pa. Sept. 11, 2014) (upholding compensatory and punitive damages judgment against title company that misappropriated certain funds at real estate closing);
- *Ferguson v. Wells Fargo Bank, NA*, 538 Fed. Appx. 782 (9th Cir. 2013) (reversing summary judgment for bank that failed to remove bankruptcy notation from consumer’s credit report);
- *King v. General Info. Servs., Inc.*, 903 F. Supp. 2d 303 (E.D. Pa. 2012) (first court to uphold constitutionality of FCRA’s obsolescence provision for old or outdated background history);
- *Howley v. Experian Info. Solutions, Inc.*, 813 F. Supp. 2d 629 (D.N.J. 2011) (first court to find that consumer may sue agency that improperly disclosed information to an identity thief);
- *Adams v. LexisNexis Risk & Info. Analytics Group, Inc.*, No. 08–4708, 2010 WL 1931135 (D.N.J. May 12, 2010) (first court to find that consumers may sue under FRCA over information in specialty Accurant report used by debt collectors and others) (leading to *Berry v. LexisNexis Risk & Info. Analytics Group, Inc.*, No. 11-754, 2014 WL 4403524 (E.D. Va.

Sept. 5, 2014) and resulting in one of largest consumer class action settlements with LexisNexis);

- *Cortez v. Trans Union, LLC*, 617 F.3d 688 (3d Cir. 2010) (upholding first ever court finding that false terrorist/OFAC alerts are subject to the FCRA, also upholding punitive damages of case tried by same counsel before a jury at the district court level, *Cortez v. Trans Union, LLC*, No. 05-5684 (E.D. Pa. Apr. 26, 2007));
- *Chakejian v. Equifax Info. Servs., LLC*, 256 F.R.D. 492 (E.D. Pa. 2009) (first certified class action under FCRA section 1681i regarding consumer disputes);
- *Shames-Yeakel v. Citizens Financial Bank*, 677 F. Supp. 2d 994 (N.D. Ill. 2009) (first court to rule that consumer may proceed to jury trial on claim that bank breached its duty to sufficiently secure its online banking system).

LECTURES / PUBLICATIONS

John is also a regular lecturer on consumer matters, including for the National Business Institute, National Consumer Law Center, Practicing Law Institute, National Association of Consumer Advocates, and other organizations. John has been interviewed and quoted concerning many legal issues affecting consumers by a wide range of media outlets, from the Wall Street Journal and Forbes Magazine to Consumer Reports and Free Speech Radio. He has authored several popular and scholarly articles, including *CFPB Tries to Nip New Wave of Unlawful Medical Debt Collection in the Bud* (The Legal Intelligencer Apr. 1, 2022), *Predatory Lending, the FCRA and the FDCPA* (NBI 2009), and *How Can I Combat Identity Theft* (Philadelphia Magazine, Dec. 2008).

DAVID A. SEARLES

DAVID A. SEARLES, of counsel to the firm, is admitted to practice before the Supreme Court of the United States, the United States Courts of Appeals for the Third, Fourth and Sixth Circuits, and the United States District Courts for the District of Maryland, the District of Colorado, the Northern District of Oklahoma, and Eastern and Middle Districts of Pennsylvania, as well as the state courts of Pennsylvania. He is a graduate of the American University School of Law, Washington, D.C., where he served on law review.

Following graduation from law school, Mr. Searles was an attorney for Community Legal Services of Philadelphia, where he specialized in consumer and bankruptcy law. In 1990, he successfully argued the first consumer reorganization bankruptcy case considered by the U.S. Supreme Court, *Pennsylvania v. Davenport*, 495 U.S. 552 (1990), and has served as lead counsel and presented arguments in numerous consumer law cases before the United States Court of Appeals for the Third Circuit. From 1992 through 1997, Mr. Searles was associated with the Philadelphia law firm of Drinker Biddle & Reath LLP, where his practice focused on Chapter 11 bankruptcy and creditors' rights. Thereafter, he was a member of Donovan Searles, LLC until 2011, specializing in consumer class action litigation.

In 2005, Mr. Searles was awarded the Equal Justice Award at the Community Legal Services Breakfast of Champions for his role in directing funding for legal assistance for low-

income residents of Philadelphia. Mr. Searles has served as the Pennsylvania contributor to SURVEY OF STATE CLASS ACTION LAW (ABA Section of Litigation – 2010), and as a contributing author of PENNSYLVANIA CONSUMER LAW (2010). He has taught advanced bankruptcy law at the Rutgers University School of Law – Camden, business law at Widener University and bankruptcy law at Pierce Junior College, Philadelphia. He is a past co-chairperson of the Education Committee of the Eastern District of Pennsylvania Bankruptcy Conference. Mr. Searles has been named a Pennsylvania Super Lawyer for many years.

CLASS ACTIONS

Lucas v. Accutrace, Inc., No. 18-9059 (S.D.N.Y. June 29, 2020);
Kelly v. Business Information Group, 2019 WL 414915 (E.D. Pa. 2019);
Gibbons v. Weltman, Weinberg & Reis Co., LPA, 2018 WL 5720749 (E.D. Pa. Oct. 31, 2018);
Patel v. Trans Union, LLC, 2018 WL 1258194 (N.D. Ca. March 11, 2018);
Carter v. Shalhoub Management Company, Inc., 2017 WL 5634300 (C.D. Ca. March 15, 2017);
Flores v. Express Services, Inc., 2017 WL 1177098 (E.D. Pa. March 30, 2017);
Miller v. Trans Union, LLC, 2017 WL 412641 (M.D. Pa. Jan. 18, 2017);
Larson v. Trans Union, LLC, No. 12-5726 (N.D. Ca. June 26, 2015);
Blandina v. Midland Funding, LLC, 2014 WL 7338744 (E.D. Pa. Dec. 23, 2014);
King v. General Information Services, Inc., C.A. No. 2:11-cv-06850 (E.D. Pa. Nov. 4, 2014);
Robinson v. General Information Services, Inc., C.A. No. 2:11-cv-07782 (E.D. Pa. Nov. 4, 2014);
Jones v. Midland Funding, LLC, 2013 WL 12286081 (D. Conn. Dec. 3, 2013);
Sapp v. Experian Information Solutions, Inc., 2:10-cv-04312 (E.D. Pa. Jan. 29, 2013);
Reibstein v. Rite Aid Corporation, 2011 WL 192512 (E.D. Pa. Jan. 18, 2011);
McCall v. Drive Financial, January Term 2006, No. 0005 (C.P. Phila. July 20, 2010);
Serrano v. Sterling Testing Systems, Inc., 711 F.Supp.2d 402 (E.D. Pa. 2010);
Summerfield v. Equifax Information Services, LLC, 264 F.R.D. 133 (D.N.J. 2009);
Chakejian v. Equifax Information Services, LLC, 256 F.R.D. 492 (E.D. Pa. 2009);
Barel v. Bank of America, 255 F.R.D. 393 (E.D. Pa. 2009);
Markocki v. Old Republic National Title Ins. Co., 254 F.R.D. 242 (E.D. Pa. 2008);
Strausser v. ACB Receivables Management, Inc., 2008 WL 859224 (E.D. Pa. Mar. 28, 2008);
Allen v. Holiday Universal, Inc., 249 F.R.D. 166 (E.D. Pa. 2008);
Cohen v. Chicago Title Insurance Company, 242 F.R.D. 295 (E.D. Pa. 2007);
Jordan v. Commonwealth Financial Systems, Inc., 237 F.R.D. 132 (E.D. Pa. 2006);
Braun v. Wal-Mart Stores, Inc., 2005 WL 3623389 (C.P. Phila. Dec. 27, 2005);
Perry v. FleetBoston Financial Corp., 229 F.R.D. 105 (E.D. Pa. 2005);

Beck v. Maximus, Inc., 2005 WL 589749 (E.D. Pa. March 11, 2005);
Stoner v. CBA Information Services, 352 F.Supp.2d 549 (E.D. Pa. 2005);
Orloff v. Syndicated Office Systems, Inc., 2004 WL 870691 (E.D. Pa. April 22, 2004);
Petrolito v. Arrow Financial Services, LLC, 221 F.R.D. 303 (D. Conn. 2004);
Piper v. Portnoff Law Associates, Ltd., 216 F.R.D. 325 (E.D. Pa. 2003);
Bonett v. Education Debt Services, Inc., 2003 WL 21658267 (E.D. Pa. 2003).

GEOFFREY H. BASKERVILLE

GEOFFREY H. BASKERVILLE is a 1982 graduate of Gettysburg College and a 1992 graduate of the Dickinson School of Law. During law school, Geoffrey published an article entitled *Human Gene Therapy: Application, Ethics and Regulation* in the Dickinson Law Review, Vol. 96, No. 4.

Since graduating from law school, Geoffrey has worked for both plaintiff and defense litigation firms practicing in the areas of medical malpractice, architect's and engineer's malpractice, the Federal Employer's Liability Act, and trucking litigation. In 2007, Geoffrey joined Francis Mailman Soumilas P.C. and began to practice in the area of consumer protection litigation, including fair credit reporting and fair debt collection.

Since that time, Geoffrey has concentrated his practice on representing consumers in cases under the Fair Credit Reporting Act, the Fair Debt Collection Practices Act, the Telephone Consumer Protection Act and other consumer statutes. He is admitted to practice before the United States Court of Appeals for the Ninth Circuit, the United States District Courts for the Eastern and Middle Districts of Pennsylvania, the District of New Jersey, the Eastern District of Michigan, the District of Colorado and the District of New Mexico, as well as the state courts of Pennsylvania and New Jersey.

Geoffrey is an active member of his community and volunteers his time by serving on his local Historic Preservation Commission. He is also an avid amateur photographer.

LAUREN KW BRENNAN

LAUREN KW BRENNAN joined Francis Mailman Soumilas in 2013 and concentrates her practice on class action litigation on behalf of consumers harmed by credit reporting errors, inaccurate employment background screening, abusive debt collection practices, and other unfair and fraudulent trade practices.

Lauren is a 2008 graduate of Swarthmore College and received her J.D. *cum laude* from Temple University's Beasley School of Law in 2013. She is a member of the National Association of Consumer Advocates (NACA) and is a regular speaker for NACA and the National Consumer Law Center (NCLC).

ADMISSIONS

Lauren is admitted to practice in the state courts of Pennsylvania and New Jersey, as well as before the United States District Court for the Eastern District of Pennsylvania and the United States District Court for the District of New Jersey. She is also admitted to practice before the United States Courts of Appeals for the Third, Seventh, Ninth, and Eleventh Circuits and before the United States Supreme Court.

CLASS COUNSEL CERTIFICATIONS

Martinez v. Avantus, LLC, No. 3:20-CV-1772 (JCH), 2023 WL 112807 (D. Conn. Jan. 5, 2023)

Healy v. Milliman, Inc., No. 2:20-cv-01473-JCC (W.D. Wash. 2022)

Watson v. Checkr, Inc., No. 3:19-cv-03396-EMC (N.D. Cal. 2021)

Deaton v. Trans Union, LLC, No. 2:20-cv-01380-AB (E.D. Pa. 2021)

Sanders v. Makespace Labs, Inc., No. 1:18-cv-10016 (S.D.N.Y. 2021)

McIntyre v. Realpage, Inc., d/b/a On-Site, No. 2:18-cv-03934-CFK (E.D. Pa. 2020)

Der-Hacopian v. DarkTrace, Inc., No. 4:18-cv-06726-HSG (N.D. Cal. 2020)

Der-Hacopian v. SentryLink, No. 8:18-cv-03001-PWG (D. Md.)

Taylor v. GfK Custom Research, Inc., No. 1:16-cv-09968-ER (S.D.N.Y. 2019)

Leo v. AppFolio, Inc., No.3:17-cv-05771-RJB (W.D. Wash. 2019)

Clark/Anderson v. Trans Union, LLC, No. 15-cv-391 & No. 16-cv-558 (E.D. Va. 2018)

Kelly v. Business Information Group, C.A. 15-6668, 2019 WL 414915 (E.D. Pa. 2019)

Flores v. Express Personnel, C.A. No. 14-cv-03298, (E.D. Pa. Oct. 21, 2016)

Larson v. Trans Union, LLC, C.A. No. 12-cv-05726, (N.D. CA, Aug. 11, 2016)

Miller v. Trans Union, LLC, C.A. No. 12-cv-1715, (M.D. Pa. Dec. 26, 2016)

Henderson v. Trans Union, LLC, C.A. No. 14-cv-00679 (E.D. Va. May 3, 2016)

Pawlowski v. United Tranzactions, LLC, C.A. no. 15-cv-2330, (E.D. Pa. April 18, 2016)

Rodriguez v. Calvin Klein, Inc., C.A. 1:15-cv-02590 (S.D.N.Y. 2015)

Giddiens v. Infinity Staffing, C.A. No. 13-cv-07115, (E.D. Pa. Jan. 12, 2016)

Giddiens v. First Advantage, C.A. No. 14-cv-5105, (E.D. Pa. July 11, 2015)

Magallon v. Robert Half International, Inc., 2015 WL 8778398 (D. Or. Nov. 10, 2015)

Patel v. Trans Union, LLC, 308 F.R.D. 292 (N.D. Cal. 2014)

Blandina v. Midland Funding, LLC, 2014 WL 7338744 (E.D. Pa. Dec. 23, 2014)

Robinson v. General Information Services, Inc., No. 11-07782 (E.D. Pa. Nov. 4, 2014)

Ramirez v. Trans Union, LLC, 2014 WL 3734525 (N.D. Cal. July 24, 2014)

JORDAN M. SARTELL

JORDAN M. SARTELL joined the class action practice of Francis Mailman Soumilas, P.C. in 2017 and litigates on behalf of consumers harmed by unlawful credit reporting, tenant screening, background checks, debt collection, and other deceptive and unfair business practices.

Jordan received his law degree *summa cum laude* from the DePaul University College of Law in 2012, where he was a member of the DePaul Law Review. Jordan began his legal career protecting vulnerable senior citizens from financial exploitation with Prairie State Legal Services. Jordan is admitted in Illinois and practices in federal district and appellate courts throughout the United States.

Jordan lives in suburban Chicagoland with his wife and two children where he is a member of the DuPage County Bar Association (“DCBA”). Jordan served on the Editorial Board of the DCBA’s legal journal, *The Brief*, from 2014 to 2023, including as its Editor in Chief from 2021 to 2022 and Associate Editor from 2020 to 2021. Jordan is also a member of the National Association of Consumer Advocates and regularly provides pro bono advice and counsel on a variety of consumer issues.

CLASS COUNSEL CERTIFICATIONS

Schultz v. Emory University, No. 1:20-cv-02002-TWT, ECF 98 (N.D. Ga. June 15, 2023)

Botts v. The Johns Hopkins University, No. 1:20-cv-01335-JRR, ECF 96 (D. Md. April 20, 2023)

Teran v. Navient Solutions, LLC et al., No. 20-03075-DM,
2023 WL 2721904 (Bankr. N.D. Cal. Mar. 30, 2023)

Stewart v. LexisNexis Risk Data Retrieval Serv’s, LLC,
No. 3:20-cv-00903-JAG (E.D. Va. July 27, 2022)

Rivera v. Equifax Info. Servs., LLC, 341 F.R.D. 328 (N.D. Ga. 2022)

Kang v. Credit Bureau Connection, Inc., No. 1:18-CV-01359-AWI-SKO,
2022 WL 658105 (E.D. Cal. Mar. 4, 2022)

McIntyre v. RealPage, Inc., d/b/a On-Site, 336 F.R.D. 422 (E.D. Pa. 2020)

Norman v. Trans Union, LLC, 479 F. Supp. 3d 98 (E.D. Pa. 2020)

Wills v. Starbucks Corporation, No. 1:16-cv-3654-CAP-CMS, ECF 59 (N.D. Ga. July 16, 2020)

Robinson v. National Student Clearinghouse, No. 1:19-CV-10749,
2020 WL 4873728 (D. Mass. July 8, 2020), *aff’d* 14 F.4th 56 (1st Cir. 2021)

Shekar v. Accurate Background, Inc., No. 17-CV-0585,
2020 WL 2563437 (E.D. Wis. May 14, 2020)

JOSEPH GENTILCORE

JOSEPH GENTILCORE is a passionate advocate for every one of his clients, and truly believes in the work that he does. Joseph focuses his practice on Fair Credit Reporting Act cases and other consumer protection matters under both state and federal law. He currently represents consumers in cases against credit card companies, banks, debt collectors, mortgage servicers and background check companies. Joseph has dedicated the majority of his career to representing individuals who have been wronged by large financial entities, and along the way has helped thousands of consumers obtain compensation from the corporations that have harmed them. As a result of Joseph's specialties, he has given lectures on various topics, including background checks, credit reporting inaccuracies, and mortgage fraud.

Joseph graduated Ursinus College, and Temple University School of Law.

Joseph has been lead counsel in over 300 individual federal consumer protection cases, and appointed class counsel in consumer protection matters. Every year since 2013, Joseph has been named a Super Lawyer or Rising Star by Pennsylvania Super Lawyers. Joseph is licensed to practice in Pennsylvania and New Jersey, and is admitted in numerous federal courts throughout the country.

SIOBHÁN MCGREAL

SIOBHÁN MCGREAL joined Francis Mailman Soumilas, P.C. in 2021, and concentrates her advocacy on behalf of consumers harmed by credit reporting errors, inaccurate background screening reports for employment and housing applications, and other abusive and unfair trade practices. Siobhán has dedicated the majority of her career to helping those who have had difficulty having their voices heard within the legal system.

Prior to joining FMS, Siobhán was a Deputy City Solicitor in the Child Welfare Unit of the City of Philadelphia Law Department, where she litigated thousands of hearings of child abuse, child neglect, applications for orders of protective custody, permanent legal custodianship, and terminations of parental rights. She started her law career as an attorney for the Administration of Children's Services in Brooklyn, NY, before moving to Southern California and working in private practice for several years. Siobhán earned her B.A. from the University of Pennsylvania and her J.D. from New York Law School after teaching English in Thailand for a short time. She has been admitted to practice in the state courts of Pennsylvania, California, and New York, as well as before the United States District Court for the Eastern District of Pennsylvania.

ERIKA HEATH

ERIKA HEATH joined Francis Mailman Soumilas, P.C. in 2020, and focuses her San Francisco practice on individual and class action litigation for consumers harmed by erroneous credit reports, inaccurate employee background checks, unlawful debt collection practices, and other unfair trade practices.

Erika is a 2002 graduate of Southern Methodist University, where she majored in business. She worked in finance in both Texas and Germany before earning her J.D. from

Northeastern University School of Law in 2009. After graduating, Erika got her start as an attorney at Atlanta Legal Aid Society, where she focused on protecting low-income consumers from abusive business practices.

Both during her time as a legal aid attorney and after, Erika has participated in a number of high-profile cases. She served as lead counsel on the case of *Strickland v. Alexander*, which ultimately led to a federal court declaring Georgia's garnishment process to be unconstitutional and enjoining most consumer garnishments in the state. As a result of her work on the *Strickland*

case, Erika received numerous awards, including the 2015 Consumer Achievement of the Year award from the National Association of Consumer Advocates (NACA). In the summer of 2017, she served as co-counsel in the trial of *Bowerman v. Field Asset Services, Inc.* (N.D. Cal.), which led to a jury verdict of more than \$2 million for 11 employees who were misclassified as independent contractors. She is currently a lecturer at University of California, Berkeley (BerkeleyLaw), where she teaches a course on the Fair Credit Reporting Act.

Erika moved with her family to the San Francisco Bay Area in 2015. She is licensed to practice in California, Georgia, and New York. She is an active member of the National Association of Consumer Advocates.

KEVIN MALLON

KEVIN MALLON joined Francis Mailman Soumilas, P.C. as Of Counsel in 2020. Mr. Mallon is also the owner of Mallon Consumer Law Group, PLLC, a New York City based consumer protection law firm focused on representing consumers harmed by credit reporting agencies, debt collectors, identity theft and consumer fraud.

Mr. Mallon has obtained relief for thousands of consumers harmed by unlawful corporate conduct since becoming an attorney in 1999. He represents consumers in both individual cases and class actions. He has successfully obtained jury verdicts on behalf of consumers as well as successfully representing consumers on appeal. Mr. Mallon is recognized as a national expert in credit reporting cases and has spoken numerous times at credit reporting conferences.

Mr. Mallon received his undergraduate degree from the C.W. Post campus of Long Island University, magna cum laude, in 1995. He attended the Santa Clara University School of Law on a full Dean's scholarship, and graduated summa cum laude in 1999. He is licensed to practice in all New York State Courts as well as the Southern District of New York and Eastern District of New York federal courts.

THE FIRM'S STAFF

The firm employs a highly qualified staff of paralegals, legal assistants, and secretaries to advance its objectives.

EXHIBIT D



Fox Rothschild LLP
ATTORNEYS AT LAW

2000 Market Street
20th Floor
Philadelphia, PA 19103-3222
Tel (215) 299-2000 Fax (215) 299-2150
www.foxrothschild.com

ABRAHAM C. REICH
Direct No: 215-299-2090
Email: AReich@FoxRothschild.com

October 18, 2022

James A. Francis, Esquire
Francis, Mailman, Soumilas, P.C.
1600 Market Street
Suite 2510
Philadelphia, PA 19103

Re: Billing Rates at Francis Mailman Soumilas P.C.

Dear Mr. Francis:

I. INTRODUCTION

By letter dated August 19, 2020, I gave you my expert opinion with regard to the proposed range of reasonable hourly billing rates for the lawyers at Francis Mailman Soumilas, P.C. (“Francis Mailman Soumilas” or “the Firm”) and, specifically, whether such rates were consistent with the Pennsylvania Rules of Professional Conduct and the Philadelphia market for legal services. You have asked me to analyze whether the rates currently charged by the Firm, as outlined in my August 2020 opinion, are within market rates and whether any adjustment is warranted. You have also asked me to consider rates for other jurisdictions where the Firm now has offices: New York, Chicago, and San Francisco. This serves as a supplement to that opinion.

II. QUALIFICATIONS

I am a partner at the law firm of Fox Rothschild LLP (“Fox Rothschild”). I have been at Fox Rothschild since 1974 as a member of its Litigation Department. From 2005 through 2017, I served as Co-Chair of Fox Rothschild and now hold the title of Chair Emeritus. For five years prior to becoming Co-Chair, I was the Managing Partner of the Philadelphia office. I have been a member of the management group at Fox Rothschild since 1985. I was the founding member of Fox Rothschild’s Professional Responsibility Committee (in 1988) and served as Chair of the Committee for eight years.



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As part of the management of Fox Rothschild over the past forty years, I have participated in the review and analysis of the hourly rates that we charge for our lawyers. This review is completed at least once a year and involves a review and analysis of the markets in which we participate to ensure that we set competitive rates and that the rates we charge are consistent with the Rules of Professional Conduct (or its predecessor, the Code of Professional Responsibility).

The process of setting hourly billable rates encompasses a number of steps. Initially, Fox Rothschild obtains public data of national, regional and local law firms' hourly billing rates. In addition, management often speaks with consultants with expertise in this area to ensure that our rates are within the range of our competitors in the market. The management team, which comprises leaders from each of our offices, discusses the hourly billing rates in each of our markets.¹ We try to establish rates that are fair and competitive.

I have had an active litigation practice for more than forty-seven years. The majority of my practice involves commercial litigation matters, in which I represent plaintiffs and defendants. I have also been active for many years representing lawyers and law firms in a myriad of issues involving professional responsibility and legal ethics, including the defense of legal malpractice claims. I have also been involved in dealing with fee disputes between and among lawyers and their clients. In 1998, I was selected to be a Fellow of the American College of Trial Lawyers.

In Fox Rothschild's litigation practice, we have handled matters in the area of consumer law. Our firm has represented large financial institutions, which have been sued for violations of the Fair Credit Reporting Act ("FCRA"), the Consumer Credit Protection Act ("CCPA") and the Fair Debt Collection Protections Act ("FDCPA"). We have defended some of the parties sued by clients of Francis Mailman Soumilas.

For over forty years, I have been active in the area of legal ethics and the interpretation and application of the Pennsylvania Rules of Professional Conduct (and its predecessor, the Code of Professional Responsibility). For many years, I have been a member of the Philadelphia Bar Association's Professional Responsibility Committee and Professional Guidance Committee. In 1983 and 1984, I served as Chair of the Professional Responsibility Committee. In 1987 and 1988, I served as Chair of the Professional Guidance Committee. I have also served as a member of a Hearing Committee for the Disciplinary Board of the Supreme Court of Pennsylvania for six years. For a portion of that time, I chaired the Hearing Committee. From approximately 1988 to 1995, I

¹ Fox Rothschild currently has twenty-nine offices in distinct marketplaces throughout the country, including Philadelphia, New York, Chicago, and San Francisco.



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have also served as one of two appointed lawyers (non-judicial) liaisons to the Judicial Ethics Committee of the Pennsylvania Conference of State Trial Judges.

I have, for many years, served on the Legal Ethics and Professional Responsibility Committee of the Pennsylvania Bar Association. For the past seventeen years, I have taught legal ethics and professional responsibility at the University of Pennsylvania Carey Law School.

In 1995, I served as Chancellor of the Philadelphia Bar Association. I have been a member of the House of Delegates of the American Bar Association and the Pennsylvania Bar Association for over twenty years. I participated in the debates surrounding the enactment of the Model Rules of Professional Conduct and many of the Amendments.

I have spoken and written on issues of trial practice and legal ethics over many years in many different forums. I have counseled hundreds of lawyers on issues of legal ethics and professional responsibility.

III. DOCUMENTS REVIEWED

I have reviewed the following documents as part of my analysis:

1. Francis Mailman Soumilas Firm Biography.
2. Francis Mailman Soumilas Attorney Biographies.
3. Francis Mailman Soumilas current hourly rates.
4. 49th Annual Survey of Law Firm Economics (2021 Edition).
5. Valeo Reports: Annual Partner Billing Rates by City.
6. Laffey Matrix.
7. Fox Rothschild LLP current rate schedule for its Philadelphia, New York, Chicago, and San Francisco lawyers.
8. Consumer Price Index, 2022.



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IV. DISCUSSION

A. The Firm's Accomplishments

Francis Mailman Soumilas (“FMS”) is one of the leading law firms representing clients in consumer-related litigation in both individual and class action suits. When the Firm was founded in 1998, few firms were actively litigating cases under the CCPA. In addition, Francis Mailman Soumilas was one of the first firms to have a significant legal practice concentrating in federal fair credit reporting, fair debt collection and consumer class actions. Over the past twenty-four years, Francis Mailman Soumilas has become a well-known and highly regarded firm in the area of consumer protection litigation.

FMS has obtained record-breaking jury verdicts and settlements in cases brought under the Fair Credit Reporting Act (FCRA). It has been certified to serve as class counsel in more than 60 consumer class actions nationwide and has obtained groundbreaking legal rulings at both the trial and appellate court levels on behalf of its clients. The firm has further served as counsel in some of the largest class action settlements in consumer protection litigation history. The following examples illustrate the groundbreaking work of FMS in the area of consumer law.

In *Ramirez v. Trans Union*, C.A. No. 12-cv-000632-JSC (N.D. Cal.), the Firm tried a class action case against Trans Union (one of the country’s “big three” credit reporting agencies) and obtained a \$60 million verdict on behalf of a class of 8,000 people who were mislabeled as Office of Foreign Assets Control (OFAC) criminals by Trans Union on credit reports in a claim brought under the FCRA. *Ramirez* is a record FCRA verdict, a rare class verdict, and was one of the top verdicts for 2017. Thereafter, Francis Mailman Soumilas argued the appeal against the former Solicitor General of the United States and the Ninth Circuit affirmed the trial court verdict (with remittitur): 951 F.3d 1008 (9th Cir. 2020). The United States Supreme Court granted certiorari in 2020, and in March of 2021, issued a 5-4 decision reversing the trial court’s decision in part on the basis its finding only a portion of the certified class had Article III jurisdiction. The Firm achieved a \$9 million dollar settlement which is currently scheduled for final approval in the Northern District of California on December 15th, 2022.

In *Robinson v. National Student Clearinghouse*, No. 1-19-cv-107490, 2020 WL 4873728 (D. Mass. July 8, 2020) *aff’d* 14 F.4th 56 (1st Cir. 2021), the Firm successfully obtained a \$2 million settlement for consumers who were overcharged for college verifications. This case was notable for the Firm’s decision to challenge the defendant as a consumer reporting agency and ultimately bring the defendant into compliance with the FCRA.



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In *Patel v. Trans Union, LLC*, 2018 WL 1258194 (N.D. Cal. March 11, 2018), the Firm served as lead Class Counsel and obtained an \$8 million settlement for a class of consumers who were falsely being reported as terrorists.

In *Thomas v. Equifax Info. Services, LLC*, No. 18-cv-684 (E.D. Va.), Francis Mailman Soumilas served as National Class Counsel in an FCRA class action alleging violations by a credit bureau for misreporting public records. The Firm provided a nationwide resolution of class action claims that were asserted across multiple jurisdictions (including injunctive relief) and an uncapped mediation program for millions of consumers. The Firm also served as National Class Counsel and obtained similar relief for millions of consumers with similar claims in *Clark v. Experian Info. Sols., Inc.*, No. 16-cv-32 (E.D. Va.) and *Clark/Anderson v. Trans Union, LLC*, NO. 15-cv-391 and No. 16-cv-558 (E.D. Va.).

In *Beach v. American Heritage Federal Credit Union*, C.A. No. 15-5942 (E.D. Pa. July 26, 2017), the Firm obtained a settlement exceeding \$1 million against American Heritage Federal Credit Union (“AHFCU”) for AHFCU having generated a cash advance from consumers’ accounts to pay fees, interest, charges or attorney fees. The court in *Beach* noted the Firm’s experience in consumer class actions and found that “[t]he settlement agreement in this matter resulted from Class Counsel’s vigorous advocacy and contested, protracted settlement negotiations.”

In *Flores v. Express Services, Inc., et al.*, C.A. No. 14-3298 (E.D. Pa. March 30, 2017), the Firm brought an action against Express Services, Inc. and Express Personnel – Philadelphia for violations of the FCRA and obtained a \$5.75 million settlement on behalf of the class. The court found that the skill and efficiency of the Firm was apparent, having “achieved a significantly favorable result on behalf of plaintiffs at the expense of the inherent risk that accompanies undertaking a contingency fee action,” and also noted that Francis Mailman Soumilas has extensive experience in consumer class action litigation.

In *White v. Experian Info. Solutions*, C.A. No. 05-01070, 2014 WL 1716154 (C.D. Cal. May 1, 2014), the court found Francis Mailman Soumilas “FCRA specialists” and appointed the Firm and its team as interim class counsel over objections from competing groups (including Boise Schiller) because the Francis, Mailman, Soumilas team’s “credentials and experience [we]re significantly stronger in class action and FCRA litigation”; affirmed sub nom *Radcliffe v. Experian Information Solutions, Inc.*, 818 F.3d 537 (9th Cir. 2016).

In *Henderson v. Acxiom Risk Mitigation, Inc.*, C.A. No. 12-589 (E.D. Va. Aug. 7, 2015), Francis Mailman Soumilas was appointed class counsel in a national FCRA class action and obtained a \$20.8 million settlement against one of the largest data sellers and background screening companies in the world.



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Finally, in *Thomas v. BackgroundChecks.com*, C.A. No. 13-029 (E.D. Va. Aug. 11, 2015), Francis Mailman Soumilas was appointed class counsel in an FCRA national class action and obtained \$18 million against another one of the largest background screening companies in the world, in addition to significant injunctive and remedial relief.

Additionally, Francis Mailman Soumilas has been certified as class counsel in federal and state courts throughout the country in over 70 matters. Since my last opinion, the Firm has been certified as class counsel in the following matters²:

- *Stewart et al. v. LexisNexis Risk Data Retrieval Services, LLC et al.*, No 3:20-cv-00903-JAG (E.D. Va. July 27, 2022);
- *Kang v. Credit Bureau Connection*, No. 18-1359, 2022 WL 658105 (E.D. Cal. Mar 4, 2022)
- *Rivera v. Equifax Info. Services, LLC*, 341 F.R.D. 328 (N.D. Ga. 2022)
- *Healy v. Milliman, Inc.*, No. 2:20-cv-01473-JCC (W.D. Wash. 2022)
- *Watson v. Checkr, Inc.*, No. 3:19-cv-03396-EMC (N.D. Cal. 2021)
- *Deaton v. Trans Union, LLC*, No. 2:20-cv-01380-AB (E.D. Pa. 2021)
- *Sanders v. Makespace Labs, Inc.*, No: 1:18-cv-10016 (S.D.N.Y. Mar. 29, 2021)
- *Der-Hacopian v. Darktrace, Inc.*, No: 18-cv-06726-HSG (N.D. Cal. Dec. 10, 2020)
- *Der-Hacopian v. Sentrylink, LLC*, No. 8:18-cv-03001-PWG (N.D. Cal. Nov. 23, 2020)
- *McIntyre v. RealPage, Inc.*, No: 2:18-cv-03934, WL 5017612 (E.D. Pa. Aug. 25, 2020)
- *Norman v. Trans Union, LLC*, No: 18-5225, 2020 WL 4735538 (E.D. Pa. Aug. 14, 2020)
- *Thomas v. Equifax Info. Services, LLC*, NO. 18-cv-684 (E.D. Va. 2020)

In addition to obtaining substantial and favorable verdicts, the Firm has also made significant contributions to public policy. The Firm set legal precedent and clarified legal issues, including:

² This is only a partial list of the matters where FMS has been certified as class counsel.



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(i) the proper standard for the investigation of a consumer dispute by credit reporting agencies and furnishers of information; (ii) the standard for proving willfulness under the FCRA; (iii) the accuracy standard for credit reports; (iv) the types of information permitted to be included in credit reports; (iv) the types of cognizable actual damages available in an FCRA action; (v) the consumer's burden of proof in an FCRA action; and, (vi) proper jury charges. Francis Mailman Soumilas has also been counsel to some of the largest FCRA settlements in history, such as *Acxiom* (\$20.8 million), *Ramirez* (\$9 million), *Hireright*, (\$29 million) and *White/Hernandez* (\$45 million).

Through Francis Mailman Soumilas' jury verdicts and class settlements, the Firm has established the "market value" for class and individual cases under the FCRA and the FDCPA. I have been informed that there were few to no reported plaintiff FCRA verdicts prior to the Firm's victories. Moreover, Francis, Mailman, Soumilas has helped establish the standards for obtaining class certification in FCRA and FDCPA cases. *See, e.g., Cortez.*

The attorneys at Francis Mailman Soumilas are very active and well known in the legal community. They regularly share their expertise at local and national conferences. By way of example, attorneys from the Firm served on the faculty for the *Perrin Conferences Class Action Litigation Virtual Conference*, April 26, 2022; as a Panel Member for the *27th Annual Consumer Financial Services Institute- Debt Collection and Credit Reporting Update* on September 20, 2022 in Chicago and March 18, 2022 in New York, NY; as a speaker for *Consumer Finance Class Actions: FDCPA, FCRA & TCPA Webinar* on September 16, 2020, and at *Representing the Pro Bono Client: Consumer Law Basics* in 2020 and 2019, presented by the Practicing Law Institute. Firm members also served on the faculty for *Consumer Financial Services & Banking Law Update*, presented by the Pennsylvania Bar Institute on October 29, 2019 and *Consumer Finance Class Actions*, presented by The Canadian Institute on July 24, 2019.

Members of the Firm also spoke at the Fair Credit Reporting Act Conference, National Association of Consumer Advocates, in Long Beach, CA in May 2019 and Baltimore, MD in April 2017. They also served on the faculty for the 21st Annual Consumer Financial Services Litigation Institute (which was CLE accredited) on "Fair Credit Reporting and Debt Collection Litigation," which took place in March and April 2016 in New York City and Chicago. They also presented at the 2014, 2015, and 2016 Consumer Rights Litigation Conference, National Consumer Law Center.

One of the founding partners, James A. Francis, has been repeatedly named to the Top 100 Pennsylvania Super Lawyers, as well as the Top 100 Philadelphia Super Lawyers. Mr. Francis was also featured on LAW360 in October 2014 as one of a small handful of American plaintiff's lawyers to be selected from a national pool and featured as part of the "Titans of the Plaintiff's Bar" series. *See* <https://www.law360.com/articles/583536/titan-of-the-plaintiffs-bar-jim-francis>. Mr. Francis has been appointed to serve as class counsel by federal courts throughout the country in more than 70 cases.



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Mark Mailman, also a founding partner, was awarded the 2018 Consumer Attorney of the Year award from the National Association of Consumer Advocates (NACA). Mr. Mailman has repeatedly been voted and named one of Pennsylvania's Super Lawyers by Law and Politics published by Philadelphia Magazine and Pennsylvania Super Lawyer Magazine from 2004- present. He has also appeared on various news programs to discuss trending consumer issues and recently published an article in *The Legal Intelligencer*, a prominent Philadelphia legal publication, entitled "Your clients' consumer rights legal issues may be hiding in plain sight".

John Soumilas was lead class counsel and lead trial counsel in the record breaking \$60 million class action jury verdict, the largest verdict in history for a case brought under the FCRA. Mr. Soumilas has been nationally recognized for his work in protecting consumer rights under the FCRA and, throughout his career, has obtained some of the highest consumer jury verdicts, including the highest known FCRA verdicts in Pennsylvania, California, and Michigan. Mr. Soumilas has also been appointed by federal judges as class counsel in some of the largest FCRA class cases and settlements.

B. Methodology for Determining Rates

There are two complementary approaches for determining reasonable hourly rates.

The **first approach** is to consider the rates for comparably skilled practitioners in the relevant market. To that end, I have reviewed the hourly billing rates of lawyers in Philadelphia, New York, Chicago, San Francisco and comparable local areas.

The hourly rates of lawyers listed in the Updated Laffey Matrix was a source I consulted.³ For the period of June 2021 through May 2022, the hourly billing rates identified were: (i) \$919 for an attorney with twenty or more years of experience; (ii) \$764 for an attorney with eleven to nineteen years of experience; (iii) \$676 for an attorney with eight to ten years of experience; (iv) \$468 for an attorney with four to seven years of experience; (v) \$381 for an attorney with one to three years of experience; and (vi) \$208 for a paralegal or law clerk. These numbers reflect an increase of approximately 9% from the 2017 rates.

I have also reviewed the current hourly rates set by my firm for its Philadelphia, New York, Chicago, and San Francisco lawyers and I have consulted with colleagues in my firm's New York, Chicago, and San Francisco offices who have served in management capacities and have experience in setting hourly rates in those jurisdictions. As I stated above, the process of setting

³ The Laffey Matrix is reflective of market rates in the Baltimore/Washington area. See www.laffeymatrix.com. In my experience, the rates in the Baltimore/Washington area are comparable to the Philadelphia Market and lower than the New York or Chicago markets.



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hourly rates for my firm begins with obtaining public data, speaking with knowledgeable consultants, and discussions with the management team. I also considered the fact that the Consumer Price Index increased by 7.9% from February 2021 – February 2022 and then increased 8.5% from July 2021 – July 2022.

A **second approach** to determine a reasonable hourly rate would look at the relevant factors set forth in Rule 1.5(a) of the Rules of Professional Conduct.

While the Pennsylvania Rules of Professional Conduct do not specifically address the reasonableness of a specific hourly rate, they do address the considerations for assessing “the propriety of a fee” in Rule 1.5. In my opinion, some of those considerations can provide a useful analytical checklist when trying to determine a reasonable hourly rate.

The factors set forth in Rule 1.5(a) are:

1. Whether the fee is fixed or contingent;
2. The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly;
3. The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
4. The fee customarily charged in the locality for similar legal services;
5. The amount involved and results obtained;
6. The time limitations imposed by the client or by the circumstances;
7. The nature and length of the professional relationship with the client; and
8. The experience, reputation, and ability of the lawyer or lawyers performing the services.

Factor Number 4 [“The fee customarily charged in the locality for similar legal services”] has already been addressed. This is a comparative review of rates charged by other lawyers in the market.

Factor Number 1 [“whether the fee is contingent or fixed”] suggests that higher rates may be justified when fees are contingent. Francis Mailman Soumilas handles its cases on a contingent fee basis. As a result, the Firm bears all the risk of the cost of litigation until resolution. In some



Fox Rothschild LLP
ATTORNEYS AT LAW

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instances, the Firm may not receive payment of its fees for several years. Further, most of the defendants are large companies with substantial financial resources and lawyers equipped to defend the actions. Many of the lawsuits address novel areas of law. In order to obtain favorable outcomes, the attorneys at Francis Mailman Soumilas spend numerous hours conducting research, conducting discovery, and crafting innovative legal arguments to overcome attempts to have their clients' cases dismissed before trial. The Firm's investment of time and resources prevent it from litigating numerous matters at the same time.

Factor Number 2 ["The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly"] also supports the notion that a higher rate would be justified for lawyers at Francis Mailman Soumilas who have distinguished themselves in their area of expertise. Finally, Factor Number 8 ["The expertise, reputation, and ability of the lawyer or lawyers performing the services"] likewise provides another reason to justify increasing rates recommended for the lawyers at Francis, Mailman, Soumilas.

The table below displays Francis Mailman Soumilas' current hourly billing rates in each jurisdiction and dates of admission to the Bar. I have been advised that in federal court hearings, the judges who have been presented with the rates I and the colleagues of my firm have supported have found them to be reasonable. *See, e.g., Chakejian v. Equifax Information Services, LLC*, 275 F.R.D. 201 (E.D. Pa. 2011), *Sapp v. Experian Information Solutions, Inc.*, 2013 WL 2130956 (E.D. Pa. May 15, 2013); *Gibbons v. Weltman, Weinberg & Reis Co., LPA*, C.A. No-17-0151-JHS (E.D. Pa., Jan. 26, 2022) ("And I've also read the Report of Abe Reich, Esquire, that confirms the reasonableness of the billing rates and fees charged in this case.")

Attorney/Paralegal	Philadelphia Hourly Billing Rate	New York Hourly Billing Rate	Date of Admission
James A. Francis	\$665	\$831.25	1995
Mark D. Mailman	\$665	\$831.25	1995
David A. Searles	\$800	\$1000	1975
Geoffrey H. Baskerville	\$575	\$718.75	1992
John Soumilas	\$635	\$793.75	1999
Lauren KW Brennan	\$255	\$318.75	2013
Jordan M. Sartell	\$255	\$318.75	2012
Joseph Gentilcore	\$305	\$381.25	2011
Siobhan McGreal	\$305	\$381.25	2008
Experienced paralegal	\$180		
Inexperienced paralegal	\$150		



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In consideration of the attorneys' years of experience, successful verdicts and recognition in the legal community, the level of current hourly billing rates is, in my opinion, below the market. An increase in the Firm's hourly billing rates is justified. The Firm has not raised its hourly billing rates since my last report of August 19, 2020. The additional experience and years practiced by the Firm's attorneys, the increase in legal fees and the dramatic increase in the Consumer Price Index during this time period justify a reasonable increase for Francis Mailman Soumilas.

V. CONCLUSION

In accordance with the foregoing analysis, and based upon my review of the prevailing market hourly billing rates, it is my opinion, within a reasonable degree of professional certainty, that the following range of hourly billing rates at Francis Mailman Soumilas is consistent with the hourly billing rates charged in the Philadelphia, New York, Chicago and San Francisco markets, and within the considerations outlined in the Rules of Professional Conduct. Moreover, my colleagues in each of those markets have reviewed this report and concur with the rates outlined below. The level of hourly billing rates within the range will depend on the complexity of the matter, the duration of the dispute and the result obtained.

Attorney/Paralegal	Range of Hourly Billing Rates (Philadelphia)	Range of Hourly Billing Rates (New York)	Range of Hourly Billing Rates (Chicago)	Range of Hourly Billing Rates (San Francisco)
James A. Francis	\$785 - \$825	\$1045 - \$1085	\$900 - \$945	\$865 - \$905
Mark D. Mailman	\$785 - \$825	\$1045 - \$1085	\$900 - \$945	\$865 - \$905
David A. Searles	\$815 - \$855	\$1135 - \$1175	\$975 - \$1015	\$895 - \$935
Geoffrey H. Baskerville	\$655 - \$695	\$915 - \$955	\$785 - \$825	\$720 - \$760
John Soumilas	\$695 - \$735	\$975 - \$1015	\$835 - \$875	\$765 - \$805
Lauren KW Brennan	\$385 - \$425	\$565 - \$605	\$460 - \$500	\$425 - \$465
Jordan Sartell	\$385 - \$425	\$565 - \$605	\$460 - \$500	\$425 - \$465
Joseph Gentilcore	\$400 - \$445	\$575 - \$615	\$480 - \$520	\$440 - \$480
Erika Heath	\$425 - \$465	\$595 - \$635	\$520 - \$560	\$490 - \$530
Kevin Mallon	\$685 - \$725	\$965 - \$1005	\$825 - \$865	\$755 - \$795
Siobhan McGreal	\$425 - \$465	\$595 - \$635	\$520 - \$560	\$490 - \$530
Experienced paralegal	\$305	\$305	\$305	\$305
Inexperienced paralegal	\$265	\$265	\$265	\$265



Fox Rothschild LLP
ATTORNEYS AT LAW

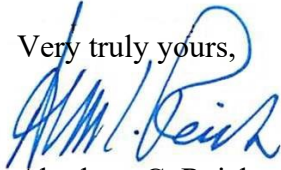
James A. Francis, Esquire
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VI. SUPPLEMENTAL INFORMATION

Attached as Exhibit A is a copy of my curriculum vitae. It contains a list of all publications that I have authored in the past ten years. I have not testified as an expert at trial in the past four years. In the past four years, I testified at a deposition as an expert witness in a confidential dispute involving a lawyer who became disabled. The matter was unrelated to an analysis of hourly rates. My current hourly rate is \$995. I have been assisted in preparing this opinion by my partner, Beth Weisser, whose hourly rate is \$625.00. We spent approximately \$6,000.00 in preparing this opinion.

If I am provided with additional information, I reserve the right to supplement or amend my opinion.

Very truly yours,



Abraham C. Reich

ACR:cah

ABRAHAM C. REICH

2000 Market Street | 20th Floor | Philadelphia, PA 19103-3291
(215) 299-2090 | Fax: (215) 299-2150 | Email: areich@foxrothschild.com

PROFESSIONAL ASSOCIATION

FOX ROTHSCHILD LLP

- Chair Emeritus, Fox Rothschild LLP (April 2017 to Present)
- Co-Chairman, Fox Rothschild LLP (April 2005 to March, 2017)
- Partner, Litigation Department
- Former Managing Partner, Philadelphia Office (2000- April 2005)
- Professional Responsibility Committee (1998-2008),
(Founding Member and Former Chair)

Abe has been with the firm since 1974. His area of practice involves all aspects of business litigation and counseling, including representation of lawyers and law firms in defense of legal malpractice claims and other disputes. Abe has taught professional responsibility at University of Pennsylvania Carey School of Law since 2007. He also provides expert testimony in connection with legal ethics and professional responsibility and business litigation matters.

EDUCATION

The Beasley School of Law at Temple University, J.D. 1974, Editor, Law Review

University of Connecticut, B.A., magna cum laude; 1971,
Elected to Phi Beta Kappa and Phi Kappa Phi

ADMISSIONS

- Pennsylvania
- United States Supreme Court
- United States Courts of Appeal for the Third, Fourth, Seventh and Eighth Circuits

PROFESSIONAL ASSOCIATIONS

- Fellow, American College of Trial Lawyers
- American Bar Association, House of Delegates (1995-2015; 2018-2020)
- American Bar Foundation
- American Association for Justice (formerly American Trial Lawyers Association)
- Association of Professional Responsibility Lawyers
- Pennsylvania Bar Association, House of Delegates; First Statewide Bench Bar Conference, Chair, 1986; Legal Ethics and Professional Responsibility Committee; Co-Chair, Task Force to Revise the Code of Judicial Conduct, 2012- 2013
- Pennsylvania Association for Justice (Formerly Pennsylvania Trial Lawyers Association) Board of Governors, 1985-1990; Commercial Litigation Committee, Former Co-Chair
- The Beasley School of Law at Temple University, Board of Overseers

PHILADELPHIA BAR ASSOCIATION ACTIVITY

- Chancellor, 1995
- Board of Governors, 1987-1999; Chair, 1989
- Commission on Judicial Selection and Retention, 1986-1989, 1993-1994; Vice-Chair, 1989; Chair, Investigative Division, 1988-1989
- Professional Guidance Committee; Chair, 1987-1988
- Professional Responsibility Committee; Chair, 1983-1984
- Annual Conference Committee (Bench Bar Conference), Vice-Chair, 1984; Chair, 1985
- Trustee, Philadelphia Bar Foundation, 1993-1996
- Trustee, Philadelphia Bar Education Center, 1993-1999
- Trustee, International Human Rights Fund, 1993-1995
- Federal Courts Committee
- State Civil Judicial Procedures Committee
- Editorial Board, the Philadelphia Lawyer, 1975-1987 (Former Publication of Business Law Section)
- Counsel to Philadelphia Bar Association in Restifo v. Philadelphia Bar Association, 1991-1994

OTHER ORGANIZATIONAL ACTIVITY

- Lecturer in Law, University of Pennsylvania Carey School of Law, “Ethics and Advocacy – From the Boardroom to the Courtroom”; Spring Semesters 2007-2022
- The Continuing Legal Education Board of the Supreme Court Of Pennsylvania, Board Member 2005 – 2010; Chair, 2011
- The Disciplinary Board of the Supreme Court of Pennsylvania, Former Hearing Committee Member and Chair, 1985-1991
- Pennsylvania Committee of State Trial Judges, Lawyer Liaison, Judicial Ethics Committee, 1988-1995
- Campaign for Qualified Judges, Former Trustee
- Pennsylvania Law Journal-Reporter, Former Member of Corporate Law Advisory Board
- The Legal Intelligencer, Former Editorial Board Member, 1992
- Lawyers Club of Philadelphia, Former Member of Board of Directors
- United States Court of Appeals for the Third Circuit, Task Force on Equal Treatment in the Courts, 1996
- Lawyer’s Advisory Committee, United States Court of Appeals for the Third Circuit, Chair, 1998
- Jenkins Law Library, Board Member and President (1995-2015)
- Pennsylvanians for Modern Courts, Advisory Board Member
- Brandeis Law Society Foundation, Director

PUBLICATIONS

- Contributing Author, *Successful Partnering Between Inside and Outside Counsel – Ethics*, Chapter 31 (Thomson Reuters 2009-2020)
- Contributing Author, *Pennsylvania Ethics Handbook*, Pennsylvania Bar Institute, 2008, 2011, 2014, 2017
- Co-Author, *Attorney Self-Governance, Federal Oversight Clash in Dodd-Frank Act*, The Legal Intelligencer, November 15, 2010
- Co-Author: *The Lawyer’s Duty of Disclosure: Ethics and Sarbanes-Oxley – The New Conundrum for Patent Lawyers*, Akron Intell. Prop. 43-63, 2007
- “*The IP Lawyer’s Duty of Disclosure Under Sarbanes-Oxley*,” The Legal Intelligencer – May 8, 2006
- Co-Author: *When Competition Crosses The Line*, Mid-Atlantic Executive Legal Advisor, Winter 2005
- Co-Author: *What Do You Do When Confronted With Client Fraud*, *Business Law Today*, Vol. 12, Number 1, September/October 2002
- Co-Author: *Screening Mechanisms: A Broader Application? Balancing Economic Realities and Ethical Obligations*, Vol. 72, Temple Law Review 1023, 2000
- *Lawyer Controlled MDPs: Critical to the Future Economic Vitality Of Our Profession*, American Bar Association Section of Environment Energy and Resources, Ethics Committee Newsletter, Vol. 1 No. 1, November 2000
- Co-Author: *The Private Securities Litigation Reform Act of 1995; An Overview*, *The Barrister*, Vol. XXVII, No. 2, Fall, 1996
- Co-Editor: *Commercial Litigation Case Notes*, *Pennsylvania Trial Lawyers Association*, 1985-1995
- Co-Author: *Time Out – A Time for Reflection on Statutes of Limitation in Federal Securities Laws and RICO Claims*, *The Barrister*, Vol. XVIII, No. 1, Spring 1987
- Co-Author: *Getting Even, Litigation*, Vol. 13, No. 2, Winter, 1987
- Book Review, *Newberg on Class Actions, (Second)*, *The Barrister*, Vol. XVI No. 4, Winter 1985/1986
- Co-Author: *Mandamus Used as Pretrial Appeal*, *Pennsylvania Law Journal Reporter*, Vol. VI, No. 10, March 1983
- Co-Author: *Derivative Action Requirements Eased*, *Pennsylvania Law Journal Reporter*, Vol. V., No. 46, December 1982
- Co-Author: *Non-Parties May Recover Discovery Costs*, *Pennsylvania Law Journal Reporter*, Vol. V, No. 39, October 1982
- *Action in Restraint of Trade: What Constitutes Conspiracy?*, *Pennsylvania Law Journal Reporter*, Vol. IV, No. 15, April 1981
- *A Shot in the Arm for Dissenting Shareholders*, *The Philadelphia Lawyer*, Vol. 17, No. 2, March 1980

- *The New Judicial Code as Part of Pennsylvania's Consolidated Statutes*, *The Philadelphia Lawyer*, Vol. 16, No. 2, June 1979
- *Equal Fault Revisited*; *The Philadelphia Lawyer*, Vol. 14, No 4, December 1977
- Co-Author: *Individual Issues in Securities Class Actions*, *The Philadelphia Lawyer*, Vol. 13, No. 3, October 1976
- *United States v. Byrum: The Troubled Application of Section 2036*, Vol. 46, *Temple Law Quarterly* 498, 1973

LECTURES

- **American Association for Justice** (Formerly American Trial Lawyers Association): Commercial Litigation, 1986
- **American Bar Association**: Section of Business Law, *Client Fraud: To Disclose or Not to Disclose*, October 2002 (National Teleconference)
- **American Conference Institute Forum On Reduced Legal Costs**, The Ethics of Alternative Fee Arrangements and Cost Reduction Strategies, 2009
- **American Intellectual Property Law Association**: *Advanced Computer & Electronic Patent Practice Seminar, The Lawyers Duty of Disclosure – Ethics and Sarbanes-Oxley – The New Conundrum for Patent Attorneys*, Boston, June 2006
- **Berks County Bar Association**: Legal Ethics, 1993
- **Delaware Valley Corporate Counsel Association**: Legal Ethics, 1987
- **Dickinson Law School**: Intellectual Property Forum, Trade Secrets, 1983 and 1985
- **DuPont Chemical CLE Series**, Ethics and the Federal Circuit, September 2007
- **Federal Bar Association**: Federal Class Actions, 1986
- **Frankford's Rotary Club**: Legal Ethics, 1987
- **Intellectual Property Owners Association**: Annual Meeting "Sarbanes-Oxley and the Duty of Disclosure for IP Lawyers", Seattle, September 2005
- **Lorman Seminars, Ethics Seminars**, 2013, 2014, 2015, 2016, 2017, 2019, 2020
- **Minnesota Institute of Legal Education**: Securities/Commercial Litigation, 1986;
- **Antitrust/Unfair Competition**, 1987; Securities/Commercial Litigation, 1989
- **Montgomery County Trial Lawyers Association**: Legal Ethics/Fee Disputes, 1991

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- **Pennsylvania Association for Justice** (Formerly Pennsylvania Trial Lawyers Association)
 - Broker/Dealer Litigation, 1984;
 - Commercial Litigation Update, 1986-1989;
 - Antitrust/Health Care, 1989;
 - Legal Ethics/Professional Responsibility, 1992/1993 (Multiple Seminars);
 - Winning with Expert Testimony, April 2002;
 - “What’s It Worth” Seminar (Ethics Component), November 2002; March 2010
 - **Pennsylvania Bar Association: Young Lawyers Section**, The Transition from Associate to Partner, 1986
 - **Pennsylvania Bar Institute**
 - Directors and Officers Insurance, 1987;
 - Legal Ethics/Professional Responsibility, 1988;
 - Legal Ethics/Professional Responsibility – Bucknell University, 1992;
 - Legal Ethics/Professional Responsibility, 1993;
 - Alternative Dispute Resolution, 1994;
 - Legal Ethics/Professional Responsibility, 1997;
 - Alternative Dispute Resolution, 1997;
 - Recent Developments in Federal Practice/Federal Evidence, 1998;
 - The Ethics of Law Firm Governance, 2000;
 - Intellectual Property Issues for Business Lawyers, April 2002;
 - Accounting Litigation After Enron, WorldCom. (Ethics Component), November 2002;
 - Attorney Fees, June 2003;
 - My First Federal Court Trial, October 2004;
 - Tortious Interference in Business/Professional Relationships, August 2005;
 - Ethical Considerations in Litigating Employment Discrimination Cases, December 2005;
 - Best Practices in Pretrial Litigation in Federal Courts, 2012, 2013, 2014; 2015, 2016;
 - Annual Labor Law Update (Ethics Component) 2014;
 - Ethics And The Labor Lawyer, November 2016;
 - Plenary CLE Ethics Program, Business Law Institute, October 2019

- **Philadelphia Bar Association**
 - Bench Bar Conference, Commercial Litigation, 1979
 - Commercial Litigation, 1982
 - Professional Responsibility, 1983
 - Federal Bench Bar Conference, 2015
 - Client Confidentiality/Duty of Disclosure, 1985
 - Professional Responsibility Committee, May 2004; September 2004 (New Rules of Professional Conduct)
 - Federal Bench Bar Conference “The Rocket Docket”, 2005
- **Philadelphia Bar Education Center**
 - Legal Ethics/Solicitation, October 1992;
 - Legal Ethics/Pro Bono Representation, November 1992; November 1993
 - “Client Conflicts: Charting Safe Courses After Maritrans”, April 1993;
 - Legal Ethics: “Attorney/Accountant Ethical Clashes in the 90’s: How to Bridge the Gap”, January 1994;
 - Ethics of Pro Bono, 1992, 1994, 1996
- **Philadelphia Business Journal**, Roundtable: The Future of Law Firms (May 22-28, 2009)
- **Pennsylvania Law Journal-Reporter**: Antitrust Law Seminar, 1981 – Course Planner
- **Philadelphia Trial Lawyers Association**
 - Commercial Litigation, 1985
 - Legal Ethics/Fee Disputes, 1991
 - Legal Ethics/Trial Practice, 1997
 - Legal Ethics and Attorney Malpractice, 2016
- **Philadelphia Intellectual Property Law Association**
 - Legal Ethics and Professional Responsibility for the Intellectual Property Lawyer, 1996;
 - ADR in IP Cases, 2005;
 - IP Lawyers and the Duty of Disclosure under the Sarbanes-Oxley Act, May 2006;
 - Ethics, May 2010
- **Smithsonian Institution/American Association of Museums**: Legal Ethics: Who is the Client? – The Museum Board, Officers, Employee, or the “Public” - 2007
- **Temple University School of Law**: Legal Ethics, 1995; Rome Program, Visiting Professor, International Civil Litigation, June 2004; Legal Ethics and Social Media 2013; 2014

- [Case 1:18-cv-01359-SKO Document 155-2 Filed 08/01/23 Page 124 of 126](#)
- **Third Circuit Judicial Conference:** Litigating Federal Civil Cases in the 21st Century: Changes and Challenges (Course Planner) 1997; Ethics in a Digital Age (Panelist), 2011
- **Thomson Reuters:** *Conflicts and Ethical Duties to Clients and the Public: Are They Reconcilable?*, Speaker, June 25, 2013
- **University of Akron School of Law,** Eighth Annual Richard C. Sughrue Symposium: The New Conundrum for Patent Lawyers: Sarbanes-Oxley, March 2006
- **University of Pennsylvania School of Law:** Social Media and Ethics, 2012
- **Villanova University School of Law:** Professional Responsibility, 1983

AWARDS

- Named as one of the Leading Litigation Attorneys in Pennsylvania, Chambers USA (2008 through 2018)
- Philadelphia Magazine Super Lawyers, “The Top Ten”, 2006; 2011-2016 “The Top 100”, 2006-2017
- Most Admired CEO Award by *Philadelphia Business Journal*, 2014
- Brandeis Society Community Achievement Award (Ben Levy), 2014
- Pennsylvania Bar Association, Award for Service as Co-Chair of Task Force on Code of Judicial Conduct, 2014
- Learned Hand Award, American Jewish Committee, 2012
- Temple University, Founder’s Day Award, 2009
- Wachovia Fidelity Award, 2007
- Fund for Religious Liberty Award, American Jewish Congress, 1997
- Outstanding Leadership Award by Pennsylvania Legal Services, 1996
- IOLTA Leadership Award, 1993
- Equal Justice Award by Community Legal Services, 1991

PERSONAL

Born: April 17, 1949, Waterbury, Connecticut

Married: Sherri Engelman Reich

Children: Two sons, Spencer and Alexander; Daughters-in-Law, Elena Steiger Reich (lawyer); Lea Michele Sarfati
Three grandchildren, Gabriella, Levi and Ever

EXHIBIT E

SUNG G KANG

EXP/FAIR ISAAC AUTO V8 SCORE - 708

Red Flag Compliance

Pursuant to your company's Identity Theft Protection Program, the following Red Flag Indicators shown below may necessitate further required action(s).

**HIT**

OFAC Check

**ID Theft
Worksheet**☐ **I have reviewed and determined this OFAC HIT to be a false positive****TRADELINES** 0 Tradelines in the last 30 days**INQUIRIES** 1 Inquiries in the last 30 days**ADDRESS** Reported via Expanded Inquiry, but different from inquiry**FRAUD ALERT** None**SSN CHECK/MESSAGES** 0084 SSN MATCHES**CONSUMER STATEMENT** None**OFAC Search results for SUNG KANG**

Saturday 07th of December 2019 06:27:34 PM

Score: **94%**Entity Number: **20130**

Program:

Name: **KANG, Song Nam****Remarks: DOB 28 Jul 1962; POB North P'yo'ngan Province, North Korea; citizen Korea, North; Secondary sanctions risk: North Korea Sanctions Regulations, sections 510.201 and 510.210; Passport 654410025 (Korea, North) expires 14 Oct 2019; Bureau Director; Linked To: MINISTRY OF STATE SECURITY. Bureau Director**

Address:

City:

Country: **Korea, North**Score: **94%**Entity Number: **23184**

Program:

Name: **KANG SONG 1****Remarks: Secondary sanctions risk: North Korea Sanctions Regulations, sections 510.201 and 510.210; Vessel Registration Identification IMO 6908096; Linked To: KOREA KUMBYOL TRADING COMPANY.**

* CBC AUTO SUMMARY *

CREDITOR NAME	SUB CODE	STATUS	TYPE	BAL AMT	PMT AMT	MOS	EST	CO-	XLATE
						REM	APR%	SGN	24 MO

EXHIBIT 2

Michael A. Caddell (SBN 249469)
mac@caddellchapman.com
Cynthia B. Chapman (SBN 164471)
cbc@caddellchapman.com
Amy E. Tabor (SBN 297660)
aet@caddellchapman.com
CADELL & CHAPMAN
P.O. Box 1311
Monterrey CA 93942
Tel.: (713) 751-0400
Fax: (713) 751-0906

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

SUNG GON KANG, individually
and on behalf of others similarly
situated,

Plaintiff,

v.

CREDIT BUREAU CONNECTION,
INC.,

Defendant.

CASE NO. 1:18-cv-01359-SKO

**DECLARATION OF MICHAEL A.
CADELL**

Date: October 25, 2022

Time: 9:30 am

Judge: Hon. Sheila K. Oberto

DECLARATION OF MICHAEL A. CADELL

I, Michael A. Caddell, am an attorney and principal of the law firm of Caddell & Chapman and counsel for Plaintiff and the Class in this proceeding. I am over 18 years of age and competent to make the following statement. All of the statements below are based on my personal knowledge.

I. CADELL & CHAPMAN

1. Caddell & Chapman has an outstanding record representing primarily plaintiffs in complex litigation across the United States. I am a past co-recipient of the Public Interest Award from The Trial Lawyers for Public Justice Foundation and have been named "Impact Lawyer of the Year" by Texas Lawyer magazine. Caddell & Chapman's other named partner, Cynthia Chapman, who is also working on behalf of the Class in this matter, has been named by the

CASE NO. 1:18-cv-01359-SKO

DECLARATION OF MICHAEL A. CADELL

1 National Law Journal as one of the “Top 40 Lawyers under 40 in America” and one of the “Top
2 50 Women Litigators in America.” Both Cynthia Chapman and I have been named by LawDragon
3 as two of the “500 Leading Plaintiffs’ Lawyers in America.”

4 2. Caddell & Chapman has worked hard to attain a strong reputation for integrity and
5 excellence,¹ even while pursuing difficult and sometimes controversial cases. As Federal District
6 Judge Royal Ferguson noted during a remand hearing in 2002, “Mr. Caddell, you and your office
7 have a gold-plated reputation as good and thorough and thoughtful lawyers.”² As United States
8 Bankruptcy Judge Alan H. W. Shiff in Connecticut noted in 2003 during a contested motion to
9 appoint Michael Caddell as Special Counsel to the Brightstar Bankruptcy Estate, “I think he’s got
10 a national reputation he’s competent Mr. Caddell appeared before the Court and my
11 recollection is that he comported himself very well.”³ Steven Mackey, from the Office of the
12 United States Trustee, Region 2, for the District of Connecticut commented in the same hearing,
13 “Mr. Caddell is more than competent, he is a pugnacious bulldog and where there is [sic] grounds
14 to make a recovery he usually does.”⁴ “Where the fire is the hottest people tend to get scorched
15 once in a while, and Mr. Caddell takes cases where the fire is as hot as it gets.”⁵

16 3. Even while representing their clients zealously, however, Caddell & Chapman have
17 maintained an excellent reputation as ethical lawyers. Ethics author and Professor Geoffrey Hazard
18 noted, having “worked with lawyers” at “Caddell & Chapman ... over the years in various
19

20
21 ¹ Texas Monthly has all named all of Caddell & Chapman’s lawyers either Texas Super Lawyers
22 or Texas Rising Stars. Both Cynthia Chapman and I have been named Texas Super Lawyers every
23 year from 2003 to 2020.

24 ² *Bellorin v. Bridgestone/Firestone, Inc.*, Cause No. P-01-CA-034, United States District Court,
25 Western District of Texas, Pecos Division, Transcript of March 5, 2002 at 9, ll. 22–23. Instead of
26 burdening the Court with copies of the transcripts and orders referenced in this personal statement,
27 copies or excerpts of these documents will be provided upon request.

28 ³ *In re: Britestarr Homes, Inc.*, Cause No. 02-50811, United States Bankruptcy Court, District of
Connecticut, Transcript of June 3, 2003 at 9, 14.

⁴ *Id.* at 12–13.

⁵ *Id.* at 12.

1 matters,” that Caddell & Chapman’s lawyers “have consistently demonstrated the most proper
 2 ethical standards, including those applicable in class suit litigation,” and that their conduct
 3 “exemplifies ... high ethical concern.”⁶

4 4. Harvard Professor William Rubenstein, frequent class-action commentator and sole
 5 author of *Newberg on Class Actions*, characterized Caddell & Chapman as “experienced” and
 6 “skilled class action attorneys,” and acknowledged me as a “nationally-known plaintiffs’
 7 attorney,”⁷ when he was serving as an expert for Toshiba in another of Caddell & Chapman’s
 8 numerous national class action recoveries.

9 5. Prominent class-action expert Professor Geoffrey Miller, in commenting on Caddell
 10 & Chapman’s work in *In Re: Trans Union Corp. Privacy Litigation*, the largest FCRA Settlement
 11 in history (where I served as Co-Lead Settlement Counsel and Cynthia Chapman was the principal
 12 author of the settlement structure), stated “[h]aving worked closely with [Caddell & Chapman], I
 13 can also attest that they are among the finest class action attorneys I have been privileged to know
 14 during my two decades of experience in this field of law. They not only possess excellent analytical
 15 and rhetorical skills, but—more importantly—displayed remarkable qualities of judgment,
 16 imagination and persistence.”

17 6. Similarly, in May of 2013, in conjunction with his analysis of the work done by
 18 Caddell & Chapman in the *In Re: Navistar Diesel Engine Products Liability Litigation*, MDL No.
 19 2223 in Chicago (where I served as Lead Counsel and Cynthia Chapman chaired the Law
 20 Committee), Professor Miller attested: “I am familiar with the Lead Counsel, Caddell & Chapman,
 21 and consider the attorneys at that firm to be among the finest class action attorneys I have
 22 encountered in more than a quarter century of work in this area,” “I know Counsel to be highly
 23 ethical attorneys,” and “Lead Counsel, with the assistance of the Court, performed admirably.”
 24

25
 26 ⁶ Hazard Declaration, filed in *White v. Experian Information Solutions, Inc.*, Case No. 05-CV-
 1070 DOC; In the U.S. Dist. Ct., Central Div. California, ECF Dkt. No. 605-6, Jan. 4, 2010.

27 ⁷ Rubenstein Declaration, Dec. 4, 2009, *Elihu v. Toshiba Am. Info. Sys., Inc.*, Case No. BC328556;
 28 in the Superior Ct. of Calif., Los Angeles County–Central District.

7. Caddell & Chapman attorney Amy E. Tabor has also worked on behalf of the Plaintiff in this litigation. Ms. Tabor is a trial attorney with 20 years of experience with complex class action litigation, including over a decade of experience with the FCRA. Ms. Tabor is a 2003 graduate of the University of Texas School of Law with high honors, where she was a member of the Texas Law Review and the Order of the Coif. She earned her B.A. from Brown University, magna cum laude, in 1995. She is licensed to practice in Texas and California and in multiple federal courts. She was named a “Texas Rising Star” by Texas Monthly magazine in 2006–2009. Ms. Tabor serves as a member of the Board of Directors of the National Association of Consumer Advocates. She has also been invited to speak at class action CLE seminars. In November 2015, she presented “The ABCs of Class Actions” at the National Consumer Law Center’s 24th Annual Consumer Rights Litigation Conference in San Antonio. In September 2016, she presented on “FCRA Class Action Litigation: Overview and Recent Developments” as part of the National Association of Consumer Advocates’ CLE webinar series.

II. CADDELL & CHAPMAN’S CLASS ACTION EXPERIENCE

8. Caddell & Chapman’s typical role in class action litigation is as either lead or co-lead counsel (or in another leadership position). For example, past cases in which Caddell & Chapman and I have served in such a role include (1) *In re Navistar Diesel Engine Products Liability Litigation*, an MDL proceeding (Case No. MDL-2223), consolidating some 35 cases from around the country (I was Lead Counsel), in which a settlement was approved on July 2, 2013, by Federal District Judge Matthew J. Kennelly in Chicago, Illinois, which provided partial reimbursement for post-warranty engine repair costs incurred by a class of over 1 million current and former owners of Ford vehicles equipped with 6.0-liter PowerStroke diesel engines (Judge Kennelly: “the settlement can be viewed as paying roughly 50% of the full value of the class members’ claims, were they to succeed” and is “clearly fair.”); (2) the Polybutylene National Class Action Litigation in Tennessee, Texas, and California (*Cox v. Shell*),⁸ in which over \$1 billion was recovered for the

⁸ Civil No. 18,844, Obion County Chancery Court, Tennessee.

class (I was Co-Lead Counsel and served throughout the settlement process as Chairman of the Board of the Consumer Plumbing Recovery Center, the entity responsible for administering the settlement, which completely replumbed over 320,000 homes across America at no cost to individual homeowners); (3) *In re: Sulzer Hip Prosthesis and Knee Prosthesis Liability Litigations*⁹ in Ohio, another \$1 billion recovery for a national class (I was Special Counsel to the Plaintiffs' Steering Committee and part of the six-lawyer team which negotiated the initial \$750 million class settlement with Sulzer); (4) *Hotchkiss v. Little Caesar Enterprises*,¹⁰ a national class action in Texas and Michigan which resulted in a settlement valued at \$350 million and the complete restructuring of the Little Caesar's franchise (I was Lead Counsel); and (5) *In re Hyundai and Kia Horsepower Litigation*,¹¹ a national class action in California that made available to the class roughly \$125 million in cash and/or debit cards (I was Co-Lead Counsel).

9. In the last few years alone, Cynthia Chapman and I were named as Class Counsel in *Elihu, et al. v. Toshiba*, a national class action settlement in California which provided extended warranties and other relief for over 860,000 purchasers of Toshiba laptop computers, Ms. Chapman was named as Co-Lead Counsel in a national class action settlement in California involving some 80,000 purchasers of Nissan's 350Z, and I was named Lead or Co-Lead Counsel in numerous national class action settlements including, inter alia: (1) *Hooker v. Sirius XM Radio Inc.*, No. 4:13-cv-00003, a nationwide Telephone Consumer Protection Act settlement for three months of free access to Sirius XM's satellite radio service, \$35 million in cash, and injunctive relief, which Judge Arenda Wright Allen of the Eastern District of Virginia finally approved on December 22, 2016; (2) *Berry v. LexisNexis*, a nationwide settlement for injunctive relief on behalf of a class of over 200 million consumers, as well as a \$13.5 million fund recovered for a smaller damages class, finally approved by Judge James R. Spencer of the Eastern District of Virginia on

⁹ Cause No. 1:01-CV-9000 (MDL Docket No. 1401), United States District Court, Northern District of Ohio, Eastern Division.

¹⁰ C.A. No. 99-CI-16042, District Court of Bexar County, Texas.

¹¹ Case No. 02CC00287, Superior Court of Orange County, California.

1 September 5, 2014 and affirmed by the Fourth Circuit in *Berry v. Schulman*, 807 F.3d 600 (4th
 2 Cir. 2015), cert. denied sub nom. *Schulman v. LexisNexis Risk & Info. Analytics Grp., Inc.*, No.
 3 15-1420, 2016 WL 2962583 (U.S. Oct. 3, 2016); (3) *Henderson v. Acxiom*, a \$20.8 million
 4 nationwide FCRA settlement given final approval on August 7, 2015 by Judge Robert E. Payne of
 5 the Eastern District of Virginia; (4) *Hawkins v. S2Verify, LLC*, No. 15-cv-03502-WHA (N.D. Cal.),
 6 an FCRA action that received final approval in the Northern District of California; (5) *Zakskorn v.*
 7 *Am. Honda Motor Co.*, a nationwide class action settlement given final approval on June 9, 2015
 8 by Judge Kimberly J. Mueller of the Eastern District of California; (6) *Teagle v. LexisNexis*
 9 *Screening Solutions, Inc.* (formerly “Choicepoint”), a nationwide FCRA Settlement given final
 10 approval on July 31, 2013, by Judge Richard Story for the Northern District of Georgia; (7)
 11 *Williams v. LexisNexis Risk Management*, a \$22 million FCRA Settlement approved June 25, 2008,
 12 by Federal District Judge Robert Payne in Richmond, Virginia; (8) *Hardy v. Hartford*, a settlement
 13 providing injunctive and monetary relief to a nationwide class of Hartford insureds with respect to
 14 the payment of General Contractors’ overhead and profit on property damage claims, approved by
 15 Judge Bury of the Federal District Court of Arizona on June 18, 2008; (9) *In re Trans Union Corp.*
 16 *Privacy Litigation*, Case 1:00-cv-04729, MDL Docket No. 1350, N.D. Illinois, at \$75 million, the
 17 largest FCRA Settlement in history and one of the largest class actions in history including more
 18 than 190 million class members, where the settlement was approved by Judge Robert Gettleman
 19 on September 17, 2008; and (10) *Williams Ambulance, et al. v. Ford Motor Co.*, a settlement that
 20 obtained final approval from Federal District Judge Marcia Crone on July 2, 2009 in the Eastern
 21 District of Texas, in which the owners of some 20,000 defective ambulances—utilizing the same
 22 diesel engine at issue in the *In re Navistar* case—were eligible to obtain substantial compensation
 23 from Ford in the form of extended warranties, reimbursements for repairs, and enhanced service.
 24 My partner Cynthia Chapman also served on the Plaintiffs’ Steering Committee and as a Co-Chair
 25 Liaison of the Law Committee in *In re: Medtronic, Inc., Implantable Defibrillators Products*
 26 *Liability Litigation*, an MDL proceeding (Case No. MDL-1726) in the United States District Court
 27 for the District of Minnesota, in which a settlement of over \$100 million was approved.
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1 10. Caddell & Chapman’s current docket includes over a dozen national and state class
2 actions around the United States. In most cases, Caddell & Chapman is either Lead or Co-Lead
3 Counsel. For example, Caddell & Chapman is Co-Lead Counsel in *White v. Experian*, No. 05-cv-
4 1070 (C.D. Cal.), a consolidated class action against all three major credit reporting bureaus
5 regarding the inaccurate reporting of debts discharged in bankruptcy, in which the court approved
6 a \$44.2 million settlement, the second-largest FCRA settlement in history, which also secured
7 “groundbreaking” injunctive relief on behalf of a nationwide class of consumers. The firm is Lead
8 Counsel in two class actions against companies who shared consumers’ private video viewing
9 information without consent in violation of the Video Privacy Protection Act, 18 U.S.C. § 2710.
10 Caddell & Chapman is also Co-Lead Counsel in several privacy class actions against hospitals
11 who used online tracking software to disclose their patients’ private medical information without
12 their consent. In addition, Caddell & Chapman is Co-Lead Counsel in usury and RICO actions
13 pending against high-interest lenders on behalf of consumer borrowers in the Eastern District of
14 Virginia, the District of Massachusetts, and the District of Oregon. Caddell & Chapman is also
15 Lead Counsel in a class action pending in the Central District of California against a doctor and
16 his companies who misrepresented the safety, effectiveness, and FDA-approval status of a medical
17 device. Finally, the firm represents women student athletes in a Title IX class action against a
18 university.

19 11. Caddell & Chapman has a track record of succeeding in contested class certifications
20 that have been affirmed on appeal. For example, Caddell & Chapman was Co-Lead Counsel for a
21 class of bank account holders in a case against Comerica Bank before Federal District Judge James
22 King in Miami in the *In Re: Checking Account Overdraft Litigation*, MDL No. 2036. On August
23 10, 2012, Caddell & Chapman, with its co-counsel, prevailed in its efforts to certify a class in that
24 case, and was successful in defeating a subsequent Rule 23(f) interlocutory appeal to the Eleventh
25 Circuit. A \$14.58 million settlement was reached in that case, which was granted final approval
26 by Judge King in 2014. Caddell & Chapman also was appointed Co-Lead counsel in an automotive
27 defect case against Honda, in which a national class settlement for over 1.2 million class members
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1 was finally approved at a Final Fairness Hearing on October 28, 2013, after Caddell & Chapman
2 achieved a contested certification of a multi-state class before Federal District Judge Margaret
3 Morrow in Los Angeles and prevailed in a Rule 23(f) interlocutory appeal to the Ninth Circuit.

4 12. On November 1, 2016, Judge Richard L. Voorhees of the Western District of North
5 Carolina granted final approval in an FCRA settlement in *Brown v. Lowes Companies, Inc.*, No.
6 5:13-cv-00079 (W.D.N.C.), appointing Caddell & Chapman as class counsel. On January 26,
7 2015, Judge John F. Walter of the Central District of California granted final approval to a FCRA
8 settlement in *Smith v. Harbor Freight Tools USA, Inc.*, No. 2:13-cv-062620-JFW-VBK. That
9 settlement provides more than 12,000 consumers cash or gift-card relief, at the class member's
10 choice, for alleged violations of the FCRA. Notably, that settlement garnered no objections from
11 class members and a lone opt-out. On January 13, 2014, Judge Jesus G. Bernal approved a
12 settlement in a class action against Farmers Insurance, regarding alleged improper subtraction of
13 deductibles from payments for losses exceeding policy limits to Farmers insureds in Arizona.
14 Under the settlement, class members will receive compensation for 100% of the alleged
15 underpayments, plus interest.

16 13. I also served as Lead Counsel in *In re Ford Motor Co. Speed Control Deactivation*
17 *Switch Products Liability Litigation*, an MDL proceeding (Case No. MDL-1718) pending in the
18 Eastern District of Michigan, where my firm took the lead role in facilitating a double-tracked,
19 multi-party mediation that resulted in more than 100 settlements of individual cases involving
20 vehicle fires. Cynthia Chapman is also serving in leadership positions in these and various other
21 state and/or national class actions around the United States.

22 14. While Caddell & Chapman's primary focus in the area of class actions has been as
23 lead counsel for a putative or certified class, it has on occasion represented objectors with respect
24 to proposed settlements that appeared abusive or defective. Since 2001, Caddell & Chapman has
25 represented objectors in nine matters with respect to proposed settlements. In several cases,
26 Caddell & Chapman was lead or co-lead counsel for most or all of the objectors' counsel. In *Clark*
27
28

1 *v. Equifax Information Services, Inc.*,¹² concerning a proposed national FCRA settlement with the
 2 three largest credit reporting agencies, the district court refused to approve a proposed settlement
 3 after a two-day contested hearing in which I presented an expert and cross-examined several
 4 witnesses, including experts, advanced by the settlement proponents. Ultimately, after the
 5 settlement was modified with Caddell & Chapman's participation and assistance, the court
 6 approved the modified settlement and noted that "the involvement of Objectors' Counsel [which
 7 were led by Caddell & Chapman] aided in improving the final settlement terms," "the value to the
 8 class has ... clearly been improved through the modifications to the Stipulation[s] of Settlement,"
 9 and "Objectors' Counsel [for whom I served as Lead Counsel] ... contributed to the final
 10 successful settlements."¹³

11 15. Similarly, in *In re Hyundai and Kia Horsepower Litigation*, Caddell & Chapman,
 12 joined by many firms across the country, successfully objected to a proposed coupon settlement
 13 and convinced a state district court in Texas to withdraw preliminary approval for that settlement.¹⁴
 14 Ultimately, Caddell & Chapman, as Co-Lead Counsel, obtained a vastly improved settlement
 15 which was submitted to and ultimately approved by the Superior Court in Orange County,
 16 California, Judge Stephen J. Sundvold, presiding. In approving the settlement, Judge Sundvold
 17 commented that it was "a tremendous accomplishment," "you've done a terrific job," and the
 18 settlement "is as fair and reasonable as could have been arrived at."¹⁵ In four of the other cases in
 19 which Caddell & Chapman has represented objectors, settlement modifications were ultimately
 20 approved by the trial court and either affirmed on appeal or became final without appeal. In several
 21

22 ¹² *Franklin E. Clark, et al. v. Equifax Information Services, Inc.*, No.8:00-1218-22, United States
 23 District Court for the District of South Carolina, Anderson Division. There were two other related
 24 cases as well, Case Nos. 8:00-1217-22 and 8:00-1219-22.

25 ¹³ *Id.*, Order of April 20, 2004, at 33 nn.34–35; 34.

26 ¹⁴ *Hermie Bundick, et al. v. Hyundai Motor Am.*, Cause No. B-168,410, 60th Judicial District of
 Jefferson County, Beaumont, Texas.

27 ¹⁵ *In re Hyundai and Kia Horsepower Litigation*, Case No. 02CC00287, Superior Court of Orange
 28 County, California, Transcript of June 16, 2004 at 33–34, 43. The court's comments were premised
 on a claims rate of 15% to 20%, and the final claims rate was 19.2%.

of those as well, the court or opposing counsel specifically noted the contributions of the objectors led or represented by Caddell & Chapman.¹⁶

16. In addition to my leadership roles in various class actions, I have also written about class action issues and have been invited to speak at class action and other CLE seminars. For example, I co-authored: “Issues Particular to Consumer Finance Class-Action Settlements,” in *The Review of Banking & Financial Services*, Vol. 25, No. 9, September 2009; “Effective Approaches to Class Action Settlements,” in the 14th Annual Consumer Financial Services Litigation Institute PLI Course Handbook Series Number B 1728, March 2009; and “Recent Developments in Class Action Certification and Settlement,” in the 15th Annual Consumer Financial Services Litigation Institute PLI Course Handbook Series Number B-1789, February 2010, and I served as a panelist on class action issues at the 2014 ABA Annual Institute on Class Actions in Chicago and at both the 14th and 15th Annual Consumer Financial Services Institutes sponsored by the Practicing Law Institute in New York and Chicago in 2009 and 2010.

III. CADDELL & CHAPMAN’S TRIAL EXPERIENCE

17. Caddell & Chapman’s trial and other complex litigation experience, which includes more than 50 jury trials and hundreds of evidentiary hearings, is germane to the appointment of Class Counsel in this matter. It is important for the Defendants to know that Plaintiffs’ Counsel has extensive trial experience and can competently try a case. Indeed, Caddell & Chapman has

¹⁶ See, e.g., *In re Wireless Tel. Federal Cost Recovery Fees Litig.*, Case No. MDL 1559, Master Case No. 4:03-md-01559, United States District Court for the Western District of Missouri, Western Division, Order dated July 8, 2004 at 4 (objectors represented by Michael Caddell and Ken Nelson “contributed significantly more to the settlement [than another group of objectors] and several of the suggestions [they] made were incorporated into the final settlement.”); *Terri Shields, on Behalf of Herself and All Others Similarly Situated v. Bridgestone/Firestone, Inc.*, Cause No. B-170,462, 172nd Judicial District Court of Jefferson County, Texas, Plaintiff’s Unopposed Motion for Entry of Order Supplementing Record, dated March 31, 2005, at 2 (“Plaintiff recognizes that the resolution of the objections to the original settlement is due to the efforts of many counsel for objectors, including, but not limited to, Mitchell A. Touns, Mike Caddell ... Many objector counsel, including the aforementioned, worked constructively with class counsel and counsel for Defendants to achieve the above-stated results.” Caddell & Chapman’s fees in Shields were all donated to charity.

1 tried numerous complex cases (and evidentiary hearings) against the Nation's top defense firms to
2 a successful conclusion.

3 18. In February 2016, after a four-day jury trial, Caddell & Chapman obtained a
4 unanimous jury verdict totaling \$11.9 million that resulted in a judgment in excess of \$3 million
5 in Hidalgo County, Texas District Court. Caddell & Chapman's client was a block and brick
6 manufacturer whose competitor's defamatory statements put the company out of business.

7 19. In 2012, Caddell & Chapman led a group of four firms pursuing False Claims Act
8 claims in a qui tam case against DaVita, the nation's second-largest dialysis-treatment provider.
9 During the course of the case, Caddell & Chapman took more than 40 depositions (I took more
10 than 35), reviewed hundreds of thousands of pages of documents, briefed dozens of motions—
11 from discovery to four dispositive motions—and handled several fiercely contested hearings, and
12 was victorious every time. The case settled for \$55 million paid to the United States and a
13 confidential amount for attorneys' fees (which was disclosed to and approved by the U.S.
14 Department of Justice).

15 20. In 2011 Caddell & Chapman settled claims against the soils engineer for a \$100
16 million, 31-story condominium tower on South Padre Island that earned the unenviable world
17 record for the tallest reinforced-concrete structure ever imploded when, shortly after the building
18 was "topped-out," it began differentially settling into the sand, causing columns to blow out, severe
19 structural cracking, and enormous floor deflection.¹⁷ The settlement occurred after Cynthia
20 Chapman's successful appellate briefing at the Texas Supreme Court and my voir dire and jury
21 selection at trial.¹⁸

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25 ¹⁷ *Ocean Tower, L.P., et al. v. Raba-Kistner Consultants, Inc. et al.*; Cause No.2008-06-3619-E;
26 357th District Court of Cameron County, Texas.

27 ¹⁸ While the terms of various settlements are confidential, public records reflect there has been a
28 complete release of \$75 million in lenders' liens on the property, and Caddell & Chapman's client
retained ownership of the property after the demolished tower had been removed.

21. In July 2009, I served as lead counsel for the Park Memorial Homeowners' Association against Lexington Insurance Company, seeking compensation for a 105-unit condominium project that had been declared uninhabitable by the City of Houston due to structural concerns. The case settled for a confidential amount—but only after we had successfully argued and prevailed over some 15 motions for summary judgment, Daubert motions, and motions in limine, and only one day before jury selection was to commence.¹⁹

22. In August 2008 we recovered \$9 million in consent judgments after trial commenced in federal district court in McAllen, Texas, which judgments were paid in full plus interest at 8.25% following a contested evidentiary bankruptcy hearing in Jackson, Mississippi, in January 2010 (the total paid recovery was \$10,084,000).²⁰

23. In March 2006, Cynthia Chapman and I completed a complex, hotly contested five-week trial against ExxonMobil in which the jury awarded Caddell & Chapman's client \$33.6 million²¹—ultimately, rather than pursuing an appeal, Exxon Mobil settled the matter. Notably, ExxonMobil's trial counsel at the time of trial was President-Elect of the American College of Trial Lawyers.

24. In July 1999, Caddell & Chapman recovered \$30 million for the families of 14 Maquiladora workers killed in a bus accident in Mexico after two weeks of trial and three unsuccessful mandamus efforts at the Texas Supreme Court brought by the victims' employer, which was represented by two former Texas Supreme Court Justices and four different law firms.²²

¹⁹ *Park Memorial Condominium Ass'n, Inc. v. Lexington Ins. Co.*; Cause No. 2007-38187, 133rd Judicial District Court of Harris County, Texas.

²⁰ *Ezequiel Reyna, et al. v. Michael J. Miller, et al.*, Case No. M-05-006; In the United States District Court for the Southern District of Texas, McAllen Division.

²¹ *Tetco v. ExxonMobil Corp.*, Cause No. 2003-CI-04424, 73rd Judicial District of Bexar County, Texas.

²² *Rodriguez-Olvera v. Salant Corp.*, CA-1998-CI-17169, State District Court, Maverick County, Texas.

25. In November 1998, we obtained a \$14.9 million verdict against Little Caesar Enterprises after a two-week trial in federal district court before Judge Ricardo Hinojosa, where our opponent was the lead name partner in Susman Godfrey, in a commercial case in which the pre-trial offer was zero, and defense counsel had the case on a reverse contingency (they worked for free if we recovered more than \$50,000). The case settled after trial for a confidential amount.²³

26. While most of Caddell & Chapman's engagements are on a contingent-fee basis, we do sometimes also represent clients who pay our fees on an hourly basis. For example, Caddell & Chapman is currently representing former majority shareholders of a business that was merged into a multi-billion dollar insurance conglomerate with respect to a \$22 million post-merger indemnification dispute in Florida state court and related proceedings before the American Arbitration Association.

IV. PAST RECOVERIES

27. Since 1996, Caddell & Chapman has obtained more than 90 recoveries valued at \$1 million or more, and more than 30 recoveries that exceeded \$10 million. The value of the Firm's total recoveries in that time total more than \$3.0 billion. To further illustrate the depth and breadth of Caddell & Chapman's experience and versatility, the following is a list of some of the cases in which Caddell & Chapman served as lead counsel and the recoveries made in each of these cases (some of which are identified by case type and others of which are identified by case style: (1) C.A. No. MDL 2223, *In re Navistar Diesel Engine Products Liability Litigation*, multi-million dollar settlement on behalf of a nationwide class of over 1 million current and former owners of Ford vehicles equipped with 6.0-liter diesel engines; (2) C.A. No. 05-0227, *United States ex rel. Woodard v. Fresenius Medical Care*, \$55 million settlement (plus confidential recovery of attorneys' fees)—qui tam—non-intervened case (one of the largest recoveries in history in a non-intervened qui tam case); (3) C.A. No. 2000-CI-17169; *Maria Dolores Rodriguez-Olvera v. Salant*

²³ *Anthony R. Alvarez v. Little Caesar Enters.*, C.A. No.-95-245; United States District Court for the Southern District of Texas, McAllen Division.

1 *Corporation, et al.*, \$30 million settlement during trial—negligence—forum non conveniens—
2 choice of law—federal jurisdiction—bankruptcy—bus accident in Mexico—14 deaths—
3 Maquiladora workers; (4) C.A. No. 2003-CI-04424; *Tetco, et al. v. ExxonMobil, et al.*, \$33.6
4 million jury verdict—breach of contract, fraud; (5) C.A. No.—95-245; *Anthony R. Alvarez, et al.*
5 *v. Little Caesar Enterprises, Inc., et al.*, \$14.9 million jury verdict—breach of contract, tortious
6 interference—restaurant franchisee versus national franchisor; (6) No. 95-27280; *Douglas E.*
7 *Moore & Toyota Town, Inc. v. Gulf States Toyota, Inc., Toyota Motor Sales, U.S.A., Inc., Jerry*
8 *Pyle, & John Bishop*, \$7.5 million verdict—fraud, breach of contract/franchise agreement—
9 automobile dealership; (7) \$23.4 million—product liability—forum non conveniens; (8) No. 93-
10 062030; *Thomas E. Meadors, et al. v. Gen. Motors, et al.*, \$7 million—product liability—motor
11 vehicle—death, personal injury; (9) *Sierra Club v. Crown Central Petroleum*, \$2.5 million—first
12 private citizen suit in Texas under Clean Air Act; settlement achieved after successful appeal to
13 Fifth Circuit Court of Appeals; (10) PB/Class, \$1.091 billion—national class action—products
14 liability—DTPA—polybutylene pipe and fittings; (11) *Dow Chemical Co., et al v. Miller Pipeline*
15 *Services*, successfully defended Miller Pipeline Services Co. at jury trial against a \$7 million suit
16 filed by Dow Chemical Co. and Dow Pipeline Co. that alleged price-fixing, patent misuse and
17 attempted monopolization; (12) \$14.0 million—breach of fiduciary duty and legal malpractice—
18 major New York law firm; (13) \$15.7 million—industrial accident—injured workers; (14) \$78.4
19 million subordination of secured debt plus \$3.8 million in payments—special counsel to
20 bankruptcy trustee—fraud, lender liability, equitable subordination—conspiracy—international
21 bank; (15) \$18.2 million debt/claims withdrawn and released plus \$500,00 payment—special
22 counsel to bankruptcy trustee—breach of contract, bailment, theft—oil terminalling facility; (16)
23 \$20 million subordination of secured debt plus payments totaling \$1.0 million—special counsel to
24 bankruptcy trustee—fraud, lender liability, breach of fiduciary duty, director’s liability, D&O
25 coverage—foreign bank, director, D&O insurer; (17) \$1.7 million—national class action—price
26 fixing conspiracy—metal building insulation industry; (18) \$22.5 million subordination of secured
27 debt plus \$8.0 million payment—breach of fiduciary duty, director’s liability—oil company; (19)

\$107.5 million subordination of secured debt plus \$2.5 million payment—fraud, lender liability—conspiracy—foreign banks; (20) \$2.0 million—product liability—helicopter crash—Mexico; (21) \$8.0 million elimination of priority debt plus 40% of Texas corporation—national class action—securities fraud, breach of fiduciary duty; (22) \$2.6 million—trade secrets—commercial defamation; (23) \$5 million—toxic tort—sulphur dioxide, asbestos; (24) \$13.1 million—products liability—DTPA—1500 homes—polybutylene pipe and fittings; (25) \$6.25 million—product liability—motor vehicle—single death; (26) \$2.85 million—breach of contract—account mismanagement—national banks; (27) \$4.3 million—commercial litigation—intellectual property—fraud, trade secrets, misappropriation; (28) \$12.1 million—national class action—consumer fraud; (29) \$22.5 million—insurance bad faith—CGL policy; (30) \$7 million—insurance bad faith—crime bond; (31) \$12 million—insurance bad faith—CGL policies—(underlying case: toxic exposure); (32) \$5 million—insurance bad faith—CGL policies—(underlying case: toxic exposure); (33) \$10.0 million—breach of fiduciary duty, director’s liability, family trusts; (34) \$5.1 million—trucking accident; (35) \$2.125 million—toxic exposure—2,4-d, dioxins; (36) \$5.05 million (including \$1.05 million in post-judgment interest) after \$4.0 million jury verdict upheld on appeal—closed head injury; (37) \$3.5 million—trucking accident; (38) \$6 million—toxic exposure—chlordane; (39) \$2.5 million—national class action—consumer fraud; (40) \$4.15 million—product liability—vehicle fire; (41) \$1.5 million—Trident submarine base—government contracts claim; (42) \$4 million settlement one day after \$6.25 million jury verdict—commercial litigation—deceptive trade practices; and (43) \$3.25 million claim successfully defended at trial—take-nothing judgment entered—\$600,000 judgment awarded firm’s client on counterclaim—commercial litigation—lender liability.

V. PRO BONO LITIGATION

28. Cynthia Chapman and I are also proud of our pro bono litigation efforts, including class litigation. For example, on a pro bono basis, Caddell & Chapman represented, as Lead Counsel for a coalition of public interest groups, Hurricanes Katrina and Rita victims in a national class action lawsuit against the Federal Emergency Management Agency (FEMA). The lawsuit,

1 in federal district court in Houston, alleged that FEMA’s mishandling of its housing assistance
2 programs violated federal laws and regulations. In a contested evidentiary hearing involving
3 several witnesses, other lawyers from Caddell & Chapman and I persuaded the court to issue a
4 preliminary injunction against FEMA compelling the agency to provide assistance with hurricane
5 victims’ utilities as well as base rent. In what lawyers from the Public Interest Law Project of
6 Oakland, California, termed “a significant victory for evacuees,” the district court found a “clear
7 entitlement” that FEMA was required to provide assistance with utilities under applicable statutes
8 and regulations, and FEMA’s failure to comply with these mandates endangered the victims’
9 ability to remain in livable housing. While the district court’s injunction was subsequently
10 overturned by the Fifth Circuit Court of Appeals, FEMA made several concessions to the
11 Hurricane victims in the interim, essentially conceding the relief sought by the lawsuit, as noted
12 by Houston’s then-Mayor, Bill White, who stated that Caddell & Chapman “was of tremendous
13 help to the Katrina evacuees in battling with FEMA.”

14 29. For further information concerning our firm’s experience and expertise, the Court is
15 referred to our website (www.caddellchapman.com).

16 VI. THE PROSECUTION OF THIS ACTION

17 30. Caddell & Chapman has worked diligently and efficiently to obtain recovery for the
18 Class in this action for over five years. Beginning in 2018, we worked with co-counsel at Francis
19 Mailman Soumilas, P.C. (“FMS”) to investigate the source of Mr. Kang’s inaccurate OFAC report.
20 We initially filed suit on behalf of Mr. Kang and the Class in the Central District of California
21 against Experian Information Solutions, Inc. (“Experian”). When informal discovery confirmed
22 that Experian was not the source of Plaintiff’s inaccurate OFAC report, we worked with co-counsel
23 to file this action against Credit Bureau Connection, Inc. (“CBC”). Once the action was filed, we
24 worked with FMS to divide responsibilities so that each task would be handled at the appropriate
25 level of experience and without unnecessary duplication of effort.

26 31. I took the deposition of Darrin Larsen, CBC’s Chief Executive Officer, regarding
27 CBC’s business and its use of a proprietary algorithm for “matching” consumers to Specially
28

1 Designated Nationals (“SDNs”) with whom the Office of Foreign Assets Control (“OFAC”)
2 prohibits United States businesses from transacting. I also took the deposition of Frank Larsen,
3 CBC’s Chief Technology Officer, regarding the more technical details concerning CBC’s SDN
4 matching algorithm. These depositions required extensive preparation, including working with
5 Plaintiff’s expert, Jonathan Jaffe, to understand the workings of CBC’s website and computer
6 code. I also attended two mediations and participated in follow-up discussions with Defendant’s
7 counsel in order to arrive at this settlement. Ms. Chapman assisted me in preparing for the
8 depositions and mediations, and we also supervised Ms. Tabor and Mr. Sartell in their briefing and
9 discovery tasks, including responding to CBC’s Motion to Dismiss and Motion for Summary
10 Judgment, briefing numerous discovery motions in order to obtain information regarding CBC’s
11 proprietary matching algorithm and identification of the Class members, and successfully moving
12 for certification of the Class. To account for potential duplication of effort in reviewing drafts and
13 supervising brief writing, I have reduced Ms. Chapman’s time by 20%.

14 32. In order to represent the Class as efficiently as possible, Plaintiff’s counsel in this case
15 delegated the bulk of the briefing and discovery tasks to more junior lawyers, Ms. Tabor of Caddell
16 & Chapman and Mr. Sartell of FMS. Ms. Tabor drafted Plaintiff’s briefs in opposition to CBC’s
17 Motion to Dismiss and Motion for Summary Judgment. She also drafted discovery, attended
18 discovery hearings, and worked with Mr. Sartell in briefing several discovery motions, including
19 Plaintiff’s motions to compel and responses to CBC’s motions for protective order. She also
20 worked with Mr. Sartell on Plaintiff’s Motion for Class Certification. Ms. Tabor also assisted me
21 in preparing for Darrin and Frank Larsen’s depositions and worked with Mr. Sartell and Plaintiff’s
22 expert to prepare for CBC’s corporate representative deposition.

23 33. For the past five years, Caddell & Chapman has worked with no guarantee of being
24 compensated for its time and efforts. Payment of the firm’s fee has always been contingent on
25 successfully obtaining relief for Plaintiff and the Class. As a result, there was a substantial risk of
26 non-payment. Work on this case has necessarily been to the exclusion of work on other matters
27 that likely would have generated fees.
28

34. Ms. Tabor and I reviewed Caddell & Chapman's time entries for this case and wrote off any time that reflected purely clerical work. *See* Ex. A. The table below identifies the attorneys and staff members from Caddell & Chapman who worked on this case and for whom the recovery of fees is sought.

NAME, POSITION, AND YEARS OF EXPERIENCE	HOURLY RATE	HOURS BILLED	SUBTOTAL
Michael A. Caddell Senior Partner (44 years)	\$1,075	320.6	\$344,645.00
Cynthia B. Chapman Senior Partner (33 years)	\$850	177.0 - 20% = 141.6	\$120,360.00
Amy E. Tabor Junior Partner (20 years)	\$750	362.8	\$271,950.00
Kathy E. Kersh Senior Paralegal (33 years)	\$325	171.3	\$55,672.50
Felicia Labbe Junior Paralegal (13 years)	\$175	15.6	\$2,730.00
TOTALS		1,011.9	\$795,357.50

35. The chart above represents Caddell & Chapman's time through July 13, 2023. Caddell & Chapman will incur additional time, which I estimate at approximately \$60,000, and additional expenses, which I estimate at approximately \$2,500, in preparing the motion for final approval, dealing with any objections, traveling to and attending the final fairness hearing, and overseeing the distribution of the settlement funds. Should there be any appeal, I estimate Caddell & Chapman would incur another \$50–100,000 in fees to brief and argue the appeal.

36. Caddell & Chapman's lodestar calculations are based on our 2023 rates, which are consistent with market rates for complex class action litigation. While Caddell & Chapman usually works on a contingent-fee basis, we also sometimes accept engagements from hourly fee-paying clients. The rates in the table above are the same rates paid by fee-paying clients. Caddell & Chapman's historical rates have been approved in complex class action litigation across the country. *Hooker v. Sirius SM Radio, Inc.*, No. 4:13-cv-0003, Dkt. 215 (E.D. Va. May 11, 2017; *Henderson v. Acxiom Risk Mitigation*, No. 3:12-cv-0589(E.D. Va. 2015); *Brown v. Lowe's*, No. 5:13-cv-0079, Dkt. 173 (W.D.N.C. November 1, 2016); *Berry v. LexisNexis Risk & Info Analytics Group, Inc.*, No. 3:11-cv-0754, Dkt. 129 (E.D. Va. Sept. 5, 2014). In December 2012, after Caddell & Chapman resolved a high-profile and complicated *qui tam* action, the United States Department of Justice approved attorneys' fees that were based on Caddell & Chapman's then-current rates, including a rate of \$875/hour for Mr. Caddell and \$675/hour for Ms. Chapman. *See United States of America, ex rel. Ivey Woodard v. DaVita Inc.*, Civil Case No. 1:05-cv-0227, Dkt. 195-1 ¶ 51 (E.D. La.).

37. Caddell & Chapman has incurred over \$29,026.65 in unreimbursed out-of-pocket expenses in this case. These expenses include deposition costs, expert costs, travel (for depositions and mediations), document review software licensing, legal research, filing fees, and administrative costs such as copying and postage, all of which are generally charged to fee-paying clients. *See* Ex. B.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 1, 2023

/s/ Michael A. Caddell
Michael A. Caddell

EXHIBIT A

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	05/08/18	Pre-suit Investigation	T/conf w/ Soumilas regarding potential OFAC case; conf w/ Chapman, Tabor;	0.7	1075	\$752.50
Chapman, Cynthia	05/08/18	Pre-suit Investigation	T/conf w/ Soumilas regarding OFAC matter; conf w/ Caddell, Tabor; analysis regarding OFAC issues;	1.2	850	\$1,020.00
Tabor, Amy	05/08/18	Pre-suit Investigation	Conf w/ Caddell, Chapman regarding new case; revise draft complaint.	2.5	750	\$1,875.00
Caddell, Michael	05/10/18	Pre-suit Investigation	Review multiple Tabor correspondence to and from Soumilas and team regarding filing complaint; review multiple Chapman responses; review Francis correspondence to and from team regarding OFAC is in the Experian One Database unlike TU; review Chapman response; review Brennan correspondence to and from team regarding revised redline draft complaint; prepare multiple correspondence to and from team regarding Experian only reports an "exact match";	1.0	1075	\$1,075.00
Chapman, Cynthia	05/10/18	Pre-suit Investigation	Review multiple Tabor correspondence to and from Soumilas and team regarding filing complaint; prepare multiple responses; review Francis correspondence to and from team regarding OFAC is in the Experian One Database unlike TU; prepare response; review Brennan correspondence to and from team regarding revised redline draft complaint; review multiple Caddell correspondence to and from team regarding Experian only reports an "exact match";	1.5	850	\$1,275.00
Tabor, Amy	05/10/18	Pre-suit Investigation	Revise complaint; correspond via email with co-counsel regarding revisions to complaint; correspond via email with Kathy Kersh regarding filing complaint.	2.5	750	\$1,875.00
Caddell, Michael	05/11/18	Pleadings and service	Review filed Complaint; review Civil Cover Sheet; review Request for Clerk to Issue Summons on Complaint; review Notice of Interested Parties;	0.4	1075	\$430.00
Chapman, Cynthia	05/11/18	Pleadings and Service	Review filed Complaint; review Civil Cover Sheet; review Request for Clerk to Issue Summons on Complaint; review Notice of Interested Parties;	0.3	850	\$255.00
Tabor, Amy	05/11/18	Pre-suit Investigation	Finalize and file complaint.	2.0	750	\$1,500.00
Labbe, Felicia	05/11/18	Pleadings and Service	Correspondence to and from Tabor regarding creating draft pleading documents for case; prepare draft pleadings; review Kersh correspondence forwarding Notice of Interested Parties; format document and send to Kersh and Tabor;	2.0	175	\$350.00
Caddell, Michael	05/14/18	Pleadings and Service	Review Francis correspondence regarding Aubin correspondence regarding writing story for Westlaw regarding case; review Notice of Assignment; review Tabor correspondence regarding same; review Chapman response; review Notice to Parties of Court-Directed ADR Program; review 21 day Summons Issued regarding Complaint; review Notice of Pro Hac Vice Application Due for Francis and Soumilas; review Tabor correspondence to and from team regarding case is on file, Pro Hac motions and summons; review Kersh correspondence to and from Francis, Soumilas and team regarding pro hac vice local rules; review Tabor correspondence to and from Francis, Soumilas and team regarding Judge Carney certified classes in the past few years and forwarding documents regarding same; review Chapman response; review Kersh correspondence to team forwarding pro hac vice application forms; review Aubin correspondence regarding writing story for Westlaw regarding case; respond;	1.4	1075	\$1,505.00
Chapman, Cynthia	05/14/18	Pleadings and Service	Review Francis correspondence regarding Aubin correspondence; review Notice of Assignment; review Tabor correspondence regarding same; prepare response; review Notice to Parties of Court-Directed ADR Program; review 21 day Summons Issued regarding Complaint; review Notice of Pro Hac Vice Application Due for Francis and Soumilas; review Tabor correspondence to and from team regarding case is on file, Pro Hac motions and summons; review Kersh correspondence to and from Francis, Soumilas and team regarding pro hac vice local rules; review Tabor correspondence to and from Francis, Soumilas and team regarding Judge Carney; prepare response; review Kersh correspondence to team forwarding pro hac vice application forms; review Aubin correspondence regarding Westlaw story; review Caddell response;	1.2	850	\$1,020.00
Tabor, Amy	05/14/18	Motion Practice	Review filings; draft pro hac vice papers; calendar deadlines; review and outline local rules and judge's procedures; research Judge Carney's recent opinions in class actions.	3.5	750	\$2,625.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Kersh, Kathy	05/14/18	Pleadings and Service	Download new documents from court; review judge assignment; review judges' local rules about mandatory chambers copies; prepare mandatory chambers copies for judges; trip to Fed Ex to send mandatory chambers copies; review emails from Tabor about PHV; review local rules about PHV admissions; send PHV notices to cocounsel; prepare G-64 forms for same; email G-64 forms to cocounsel	2.4	325	\$780.00
Labbe, Felicia	05/14/18	Pleadings and Service	Correspondence to and from Tabor regarding formatting pro hac vice motion; format motion and send to Tabor;	0.3	175	\$52.50
Caddell, Michael	05/15/18	Pleadings and Service	Review Kersh correspondence to and from team regarding sending complaint out for service; review Kersh correspondence to and from Alvarez regarding telephone conference and forwarding initiating documents for service;	0.2	1075	\$215.00
Chapman, Cynthia	05/15/18	Pleadings and Service	Review Kersh correspondence to and from team regarding sending complaint out for service; review Kersh correspondence to and from Alvarez regarding telephone conference and forwarding initiating documents for service;	0.1	850	\$85.00
Tabor, Amy	05/15/18	Pleadings and Service	Review email correspondence regarding service of summons; calendar deadlines; calendar hearing date; research standing issues.	1.3	750	\$975.00
Kersh, Kathy	05/15/18	Pleadings and Service	Review local rules regarding documents to be included with complaint; prepare service packet and forward same to CLSS for service of complaint; review response; telephone call to CLSS; update case management notebook	1.0	325	\$325.00
Caddell, Michael	05/16/18	Pleadings and Service	Review Response filed by Pro Hac Vice attorney John Soumilas on behalf of Plaintiff Sung Kang. RE: Notice of Filing Fee Due. PHV fee N/A. Awaiting updated Certificates of Good Standing from the Supreme Court of Pennsylvania and New Jersey in order to properly complete an application to appear Pro Hac Vice; review Response filed by Pro Hac Vice attorney James A. Francis on behalf of Plaintiff Sung Kang. RE: Notice of Filing Fee Due. PHV fee N/A. Awaiting updated Certificates of Good Standing from the Supreme Court of Pennsylvania and New Jersey in order to properly complete an application to appear Pro Hac Vice;	0.2	1075	\$215.00
Chapman, Cynthia	05/16/18	Pleadings and Service	Review Response filed by Pro Hac Vice attorney John Soumilas; review Response filed by Pro Hac Vice attorney James A. Francis;	0.1	850	\$85.00
Kersh, Kathy	05/16/18	Pleadings and Service	Review documents from co-counsel regarding PHV applications	0.3	325	\$97.50
Kersh, Kathy	05/17/18	Pleadings and Service	Review emails from Francis & Mailman; review PHV applications from same; revise PHV applications; download G-64 order form; prepare draft of proposed order; respond to Francis & Mailman email; review other PHV orders in CD of CA case; review local rule 83	1.5	325	\$487.50
Caddell, Michael	05/18/18	Pleadings and Service	Review Alvarez correspondence to Kersh and team regarding service was effected on Experian Information Solutions, Inc.;	0.1	1075	\$107.50
Chapman, Cynthia	05/18/18	Pleadings and Service	Review Alvarez correspondence to Kersh and team regarding service was effected on Experian Information Solutions, Inc.;	0.1	850	\$85.00
Tabor, Amy	05/18/18	Pleadings and Service	Review recent Ninth Circuit standing decisions; outline key cases.	1.0	750	\$750.00
Caddell, Michael	05/21/18	Pleadings and Service	Review Tabor correspondence to and from counsel and team regarding service on Experian; respond; review McLoon correspondence regarding scheduling telephone conference; respond; prepare correspondence to Francis, Soumilas and team regarding scheduling telephone conference with McLoon regarding his investigation has shown that Experian has never sold an OFAC product to Norm Reeves Honda;	0.5	1075	\$537.50
Chapman, Cynthia	05/21/18	Pleadings and Service	Review Tabor correspondence to and from counsel and team regarding service on Experian; review Caddell response; review McLoon correspondence regarding scheduling telephone conference; review Caddell response; review Caddell correspondence to Francis, Soumilas and team regarding scheduling telephone conference with McLoon regarding his investigation has shown that Experian has never sold an OFAC product to Norm Reeves Honda;	0.4	850	\$340.00
Kersh, Kathy	05/21/18	Pleadings and Service	Review email from CLSS regarding service on Experian; review Tabor email regarding same	0.2	325	\$65.00
Caddell, Michael	05/22/18	Pleadings and Service	Review Francis correspondence to and from team regarding McLoon investigation has shown that Experian has never sold an OFAC product to Norm Reeves Honda; prepare multiple responses; review Chapman correspondence to and from counsel and team regarding AMPs; review Tabor correspondence to team forwarding draft motion and proposed order to serve as local counsel for Francis and Soumilas; respond; prepare correspondence to and from McLoon regarding scheduling telephone conference; conf w/ Chapman;	0.7	1075	\$752.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	05/22/18	Pleadings and Service	Review Francis correspondence to and from team regarding McLoon investigation has shown that Experian has never sold an OFAC product to Norm Reeves Honda; review multiple Caddell responses; prepare correspondence to and from counsel and team regarding AMPs; review Tabor correspondence to team forwarding draft motion and proposed order to serve as local counsel for Francis and Soumilas; review Caddell response; review Caddell correspondence to and from McLoon regarding scheduling telephone conference; conf with Caddell;	0.4	850	\$340.00
Kersh, Kathy	05/22/18	Pleadings and Service	Review documents from Francis & Mailman; revise G-64 forms; review local rules on signatures and exhibits; review and respond to email from Rayne Bennett; update case management notebook	0.7	325	\$227.50
Caddell, Michael	05/23/18	Pleadings and Service	Review Tabor correspondence to and from team regarding Carney and pro hac vice admission forms; respond; prepare correspondence to and from McLoon regarding scheduling telephone conference; review Soumilas correspondence to and from team regarding sharing Kang report with McLoon; prepare correspondence to and from McLoon forwarding Kang report;	0.6	1075	\$645.00
Chapman, Cynthia	05/23/18	Pleadings and Service	Review Tabor correspondence to and from team regarding Carney and pro hac vice admission forms; review Caddell response; review Caddell correspondence to and from McLoon regarding telephone conference; review Soumilas correspondence to and from team regarding sharing Kang report with McLoon; review Caddell correspondence to and from McLoon forwarding Kang report;	0.4	850	\$340.00
Tabor, Amy	05/23/18	Motion Practice	Correspond via email with Michael Caddell regarding pro hac vice admissions.	0.1	750	\$75.00
Kersh, Kathy	05/23/18	Pleadings and Service	Review emails regarding motion to serve as local counsel; review email from Francis & Mailman regarding signatures on forms	0.2	325	\$65.00
Caddell, Michael	05/24/18	Motion Practice	Review McLoon correspondence regarding description of the research on AMPs; t/conf w/ McLoon regarding Kang; prepare correspondence to and from Francis and team regarding telephone conference with McLoon;	1.1	1075	\$1,182.50
Chapman, Cynthia	05/24/18	Motion Practice	Review McLoon correspondence regarding description of the research on AMPs; review Caddell correspondence to and from Francis and team regarding telephone conference with McLoon;	0.4	850	\$340.00
Tabor, Amy	05/24/18	Motion Practice	Review correspondence from Michael Caddell regarding conversation with counsel for Experian.	0.1	750	\$75.00
Tabor, Amy	05/29/18	Motion Practice	Correspond via email with Kathy Kersh regarding pro hac vice filings.	0.1	750	\$75.00
Kersh, Kathy	05/29/18	Pleadings and Service	Download and review COGS for Soumilas; email to Tabor about filing PHV applications and motion to serve as local counsel; review response	0.3	325	\$97.50
Tabor, Amy	05/30/18	Motion Practice	Teleconference with Michael Caddell and Cynthia Chapman regarding case status.	0.2	750	\$150.00
Kersh, Kathy	05/30/18	Pleadings and Service	Review return of service; scan document to network	0.5	325	\$162.50
Caddell, Michael	05/31/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding voluntarily withdraw the lawsuit; respond; review Chapman response;	0.3	1075	\$322.50
Chapman, Cynthia	05/31/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding voluntary withdrawal; review Caddell response; prepare response;	0.2	850	\$170.00
Caddell, Michael	06/04/18	Pleadings and Service	Review McLoon correspondence regarding Experian being dismissed; respond; review McLoon correspondence regarding scheduling telephone conference;	0.3	1075	\$322.50
Chapman, Cynthia	06/04/18	Pleadings and Service	Review McLoon correspondence regarding Experian being dismissed; review Caddell response; review McLoon correspondence regarding telephone conference;	0.2	850	\$170.00
Caddell, Michael	06/06/18	Motion Practice	Review Fowler correspondence proposed stipulation of time to respond; respond; review Stipulation Extending Time to Answer the complaint as to Experian Information Solutions, Inc. answer now due 7/6/2018, re Complaint; t/conf w/ McLoon regarding dismissal but need research;	0.8	1075	\$860.00
Chapman, Cynthia	06/06/18	Pleadings and Service	Review proposed stipulation of time to respond; review Caddell response; review Stipulation Extending Time to Answer the complaint as to Experian Information Solutions, Inc.;	0.5	850	\$425.00
Caddell, Michael	06/08/18	Pleadings and Service	Review Notice of Intent upon filing of the complaint; review Notice of Clerical Error;	0.2	1075	\$215.00
Chapman, Cynthia	06/08/18	Pleadings and Service	Review Notice of Intent upon filing of the complaint; review Notice of Clerical Error;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	06/13/18	Pleadings and Service	Review Tabor correspondence to and from Francis, et al regarding scheduling telephone conference;	0.2	1075	\$215.00
Chapman, Cynthia	06/13/18	Pleadings and Service	Review Tabor correspondence to and from Francis, et al regarding scheduling telephone conference;	0.1	850	\$85.00
Caddell, Michael	06/15/18	Pleadings and Service	Review Tabor correspondence to team regarding conference call number; review Chapman response; prepare correspondence to and from McLoon regarding telephone conference with Francis and Soumilas regarding dismissing case against Experian; t/conf w/ McLoon, Francis, et al.;	1.1	1075	\$1,182.50
Chapman, Cynthia	06/15/18	Pleadings and Service	Review Tabor correspondence to team regarding conference call number; prepare response; review Caddell correspondence to and from McLoon regarding telephone conference with Francis and Soumilas regarding dismissing case against Experian;	0.2	850	\$170.00
Caddell, Michael	06/18/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding sharing address for southern California AMPS; respond; review Tabor correspondence forwarding draft Voluntary Dismissal;	0.3	1075	\$322.50
Chapman, Cynthia	06/18/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding sharing address for southern California AMPS; review Caddell response; review Tabor correspondence forwarding draft Voluntary Dismissal;	0.2	850	\$170.00
Tabor, Amy	06/18/18	Motion Practice	Teleconference with Michael Caddell and Cynthia Chapman regarding case status; draft voluntary dismissal.	0.5	750	\$375.00
Caddell, Michael	06/20/18	Pleadings and Service	Review McLoon correspondence regarding AMPS address; respond; prepare correspondence to Francis, Soumilas forwarding AMPS address;	0.2	1075	\$215.00
Chapman, Cynthia	06/20/18	Pleadings and Service	Review McLoon correspondence regarding AMPS address; review Caddell response; review Caddell correspondence to Francis, Soumilas forwarding AMPS address;	0.1	850	\$85.00
Caddell, Michael	06/21/18	Motion Practice	Research AMPS; prepare correspondence to Soumilas, Francis regarding AMPS;	0.4	1075	\$430.00
Chapman, Cynthia	06/21/18	Pleadings and Service	Review Caddell correspondence to Soumilas, Francis regarding AMPS;	0.1	850	\$85.00
Kersh, Kathy	06/26/18	Pre-suit Investigation	Review email from Tabor; internet research and Accurint search regarding AMPS address in Valencia CA; print report.	0.4	325	\$130.00
Caddell, Michael	07/02/18	Pleadings and Service	Review Fowler correspondence regarding status of Kang dismissal; review Tabor correspondence to and from Soumilas, Francis regarding whether Kang got any more information from the dealership;	0.3	1075	\$322.50
Chapman, Cynthia	07/02/18	Pleadings and Service	Review Fowler correspondence regarding status of Kang dismissal; review Tabor correspondence to and from Soumilas, Francis regarding information from the dealership;	0.2	850	\$170.00
Kersh, Kathy	07/02/18	Pre-suit Investigation	Review MI Secretary of State; CA secretary of state sites, Linked In, PR Newswire, Yelp, and other websites to gather information on AMPS Insurance and Credit Bureau Connection; prepare email to Tabor regarding same	3.7	325	\$1,202.50
Kersh, Kathy	07/03/18	Pre-suit Investigation	Review information on AMPS and 700Credit, LLC; internet research to locate 700Credit LLC corporate locations, ownership and information; review and respond to Tabor email	2.5	325	\$812.50
Caddell, Michael	07/04/18	Pleadings and Service	Prepare correspondence to team regarding dismissing case; prepare correspondence to McLoon, Fowler and team forwarding voluntary dismissal; prepare correspondence to Francis, Soumilas and team forwarding proposed voluntary dismissal;	0.3	1075	\$322.50
Chapman, Cynthia	07/04/18	Pleadings and Service	Review Caddell correspondence to team regarding dismissing case; review Caddell correspondence to McLoon, Fowler and team forwarding voluntary dismissal; review Caddell correspondence to Francis, Soumilas and team forwarding proposed voluntary dismissal;	0.2	850	\$170.00
Caddell, Michael	07/05/18	Pleadings and Service	Review Francis correspondence to team regarding dismissal of case; review Francis correspondence to team regarding proposed voluntary dismissal; respond; prepare correspondence to and from McLoon, Fowler and team regarding dismissal; review Tabor correspondence to and from Kersh regarding filing voluntary dismissal; respond; review Notice of Voluntary Dismissal filed by Plaintiff Sung Kang, Dismissal is Without Prejudice; review Kersh correspondence forwarding chambers copy of the same;	0.5	1075	\$537.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	07/05/18	Pleadings and Service	Review Francis correspondence to team regarding dismissal of case; review Francis correspondence to team regarding proposed voluntary dismissal; review Caddell response; review Caddell correspondence to and from McLoon, Fowler and team regarding dismissal; review Tabor correspondence to and from Kersh regarding filing voluntary dismissal; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	07/05/18	Motion Practice	Review email correspondence regarding voluntary dismissal; finalize and file voluntary dismissal.	0.2	750	\$150.00
Kersh, Kathy	07/05/18	Pleadings and Service	Review Tabor email and e-file notice of dismissal; prepare judge's copy and correspondence; prepare FedEx and deliver FedEx to fedex office; download file stamped copy	1.0	325	\$325.00
Caddell, Michael	07/09/18	Pleadings and Service	Review Sartell correspondence to and from team regarding Kang received a response from "Auto/Mate" and forwarding same;	0.2	1075	\$215.00
Chapman, Cynthia	07/09/18	Pleadings and Service	Review Sartell correspondence to and from team regarding Kang received a response from "Auto/Mate" and forwarding same;	0.1	850	\$85.00
Tabor, Amy	07/10/18	Settlement Talks and Conferences	Review hearing transcript.	0.1	750	\$75.00
Caddell, Michael	07/11/18	Motion Practice	Review Kersh correspondence to team regarding Credit Bureau Connection; review Kersh correspondence to team regarding AMPS entity; research Credit Bureau Connection;	0.6	1075	\$645.00
Chapman, Cynthia	07/11/18	Pleadings and Service	Review Kersh correspondence to team regarding Credit Bureau Connection; review Kersh correspondence to team regarding AMPS entity;	0.2	850	\$170.00
Kersh, Kathy	07/11/18	Pleadings and Service	review emails on Credit Bureau Connection and 700Credit, LLC and forward to Caddell and Chapman	0.3	325	\$97.50
Caddell, Michael	07/12/18	Pleadings and Service	Review Tabor correspondence to Sartell et al and team regarding update;	0.2	1075	\$215.00
Chapman, Cynthia	07/12/18	Pleadings and Service	Review Tabor correspondence to Sartell et al and team regarding update;	0.1	850	\$85.00
Tabor, Amy	07/12/18	Pre-suit Investigation	Prepare email to co-counsel regarding identity of defendants and possible filing of new complaint.	0.5	750	\$375.00
Caddell, Michael	07/13/18	Pleadings and Service	Review Sartell correspondence to team regarding update and forwarding Kang's credit reports;	0.2	1075	\$215.00
Chapman, Cynthia	07/13/18	Pleadings and Service	Review Sartell correspondence to team regarding update and forwarding Kang's credit reports;	0.2	850	\$170.00
Caddell, Michael	07/16/18	Pleadings and Service	Review Tabor correspondence to team regarding filing suit against Credit Bureau Connection in Fresco or in Valencia and regarding scheduling telephone conference; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	07/16/18	Pleadings and Service	Analysis regarding venue; Review Tabor correspondence to team regarding filing suit against Credit Bureau Connection in Fresco or in Valencia and regarding scheduling telephone conference; conf w/ Caddell;	0.8	850	\$680.00
Kersh, Kathy	07/16/18	Pleadings and Service	Review two new cases filed in CA and VA; forward documents to attorneys	0.3	325	\$97.50
Caddell, Michael	07/17/18	Pleadings and Service	Review Kersh correspondence to team regarding Credit Bureau Connection sells OFAC information and forwarding screenshots;	0.3	1075	\$322.50
Chapman, Cynthia	07/17/18	Pleadings and Service	Review Kersh correspondence to team regarding Credit Bureau Connection sells OFAC information and forwarding screenshots;	0.8	850	\$680.00
Kersh, Kathy	07/17/18	Pre-suit Investigation	Review CBC site regarding OFAC products; obtain screenshots of OFAC and FCRA information; email to attorneys regarding same	0.5	325	\$162.50
Caddell, Michael	07/18/18	Pleadings and Service	Review Sartell correspondence to Tabor and team regarding scheduling telephone conference next week;	0.1	1075	\$107.50
Chapman, Cynthia	07/18/18	Pleadings and Service	Review Sartell correspondence to Tabor and team regarding telephone conference next week;	0.1	850	\$85.00
Caddell, Michael	07/24/18	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding update from Kang and regarding scheduling telephone conference;	0.2	1075	\$215.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	07/24/18	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding update from Kang and regarding telephone conference;	0.2	850	\$170.00
Caddell, Michael	07/25/18	Pleadings and Service	Prepare correspondence to and from team regarding scheduling telephone conference;	0.2	1075	\$215.00
Chapman, Cynthia	07/25/18	Pleadings and Service	Review Caddell correspondence to and from team regarding telephone conference;	0.1	850	\$85.00
Caddell, Michael	07/26/18	Pleadings and Service	Review Sartell correspondence to team regarding scheduling telephone conference and forwarding invite;	0.1	1075	\$107.50
Chapman, Cynthia	07/26/18	Pleadings and Service	Review Sartell correspondence to team regarding telephone conference and forwarding invite;	0.1	850	\$85.00
Caddell, Michael	07/30/18	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding telephone conference and forwarding documents in preparation of same; t/conf Francis, Sartell, Tabor, et al.;	1.0	1075	\$1,075.00
Chapman, Cynthia	07/30/18	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding telephone conference and forwarding documents; t/conf Francis, Sartell, Tabor, et al.;	1.1	850	\$935.00
Tabor, Amy	07/30/18	Pre-suit Investigation	Teleconference with Jim Francis, John Soumilas, Jordan Sartell, Mike Caddell, and Cynthia Chapman regarding identification of potential defendant.	0.5	750	\$375.00
Caddell, Michael	08/02/18	Pleadings and Service	Review Tabor correspondence to and from Sartell, et al and team regarding screenshot and forwarding same;	0.2	1075	\$215.00
Chapman, Cynthia	08/02/18	Pleadings and Service	Review Tabor correspondence to and from Sartell, et al and team regarding screenshot and reviewing same;	0.2	850	\$170.00
Caddell, Michael	08/13/18	Pleadings and Service	Review Sartell correspondence to and from team regarding upcoming MCC deadline per local rules; respond;	0.2	1075	\$215.00
Chapman, Cynthia	08/13/18	Pleadings and Service	Review Sartell correspondence to and from team regarding upcoming MCC deadline per local rules; review Caddell response;	0.1	850	\$85.00
Tabor, Amy	08/13/18	Pre-suit Investigation	Teleconference with Norm Reeves Honda regarding OFAC provider; correspond via email with co-counsel regarding investigation.	1.0	750	\$750.00
Caddell, Michael	08/14/18	Pleadings and Service	Prepare correspondence to and from Tabor and team regarding recommendation regarding upcoming MCC deadline per local rules;	0.2	1075	\$215.00
Chapman, Cynthia	08/14/18	Pleadings and Service	Review Caddell correspondence to and from Tabor and team regarding recommendation regarding upcoming MCC deadline per local rules;	0.1	850	\$85.00
Caddell, Michael	08/15/18	Pleadings and Service	Review Tabor correspondence to and from team regarding recommendation; respond;	0.2	1075	\$215.00
Chapman, Cynthia	08/15/18	Pleadings and Service	Review Tabor correspondence to and from team regarding recommendation; review Caddell response;	0.1	850	\$85.00
Tabor, Amy	09/18/18	Pre-suit Investigation	Prepare email to John Soumilas regarding status of draft complaint.	0.1	750	\$75.00
Caddell, Michael	09/28/18	Pre-suit Investigation	Review Soumilas correspondence to and from team regarding revised complaint and forwarding same;	0.3	1075	\$322.50
Chapman, Cynthia	09/28/18	Pre-suit Investigation	Review Soumilas correspondence to and from team regarding revised complaint and reviewing same;	0.2	850	\$170.00
Tabor, Amy	09/28/18	Pre-suit Investigation	Review draft complaint.	0.5	750	\$375.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	10/01/18	Pre-suit Investigation	Review Soumilas correspondence to and from Tabor and team regarding final draft of complaint for filing; prepare correspondence to team regarding changes to complaint and forwarding same;	0.6	1075	\$645.00
Chapman, Cynthia	10/01/18	Pre-suit Investigation	Review Soumilas correspondence to and from Tabor and team regarding final draft of complaint for filing; review complaint; review Caddell correspondence to team regarding changes to complaint and reviewing same;	0.5	850	\$425.00
Caddell, Michael	10/02/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding changes to complaint and filing same; review Complaint (Class Action) against Credit Bureau Connection, Inc. by Sung Gon Kang. Attorney Caddell, Michael A. added. (Filing fee \$ 400, receipt number 0972-7899721); review Tabor correspondence to and from team regarding case has been filed; review Chapman response; review Tabor correspondence regarding renaming case; review Chapman response; review Kersh correspondence to and from team regarding summons and final cause number; review Summons Issued as to *Credit Bureau Connection, Inc.* with answer to complaint due within *21* days; review Civil New Case Documents Issued: Initial Scheduling Conference set for 1/15/2019 at 09:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto; review Tabor correspondence to and from team regarding Judge Ishii and Magistrate Oberto; review Chapman response;	1.0	1075	\$1,075.00
Chapman, Cynthia	10/02/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding changes to complaint and filing same; review complaint; review Tabor correspondence to and from team regarding filing; prepare response; review Tabor correspondence regarding renaming case; prepare response; review Kersh correspondence to and from team regarding summons and final cause number; review Tabor correspondence to and from team regarding Judge Ishii and Magistrate Oberto; prepare response;	1.2	850	\$1,020.00
Tabor, Amy	10/02/18	Pleadings and Service	Finalize and file Original Complaint; review Scheduling Conference Order; review local rules; correspond via email with co-counsel regarding filing status.	2.0	750	\$1,500.00
Kersh, Kathy	10/02/18	Pleadings and Service	Review complaint; pdf complaint; prepare civil cover sheet; review CM-ECF rules in ED of California; review and respond to Tabor email; e-file complaint and civil cover sheet; download file stamped copies; pay filing fee	1.5	325	\$487.50
Caddell, Michael	10/03/18	Pleadings and Service	Review Kersh correspondence to and from Alvarez and team regarding documents to serve on defendant Credit Bureau Connection, Inc. and forwarding same; review Kersh correspondence to and from team regarding consent/decline form regarding magistrate judge and forwarding same; review Kersh correspondence to and from Francis and team regarding draft pro hac vice applications and forwarding documents on same;	0.3	1075	\$322.50
Chapman, Cynthia	10/03/18	Pleadings and Service	Review Kersh correspondence to and from Alvarez and team regarding documents to serve on defendant Credit Bureau Connection, Inc. and forwarding same; review Kersh correspondence to and from team regarding consent/decline form regarding Magistrate Judge and forwarding same; review Kersh correspondence to and from Francis and team regarding draft pro hac vice applications and forwarding documents on same;	0.3	850	\$255.00
Kersh, Kathy	10/03/18	Pleadings and Service	Review documents from court; download same; review local rules regarding service of process; review Tabor email; telephone call with CLSS Process Service; email documents to be served; review local rules regarding certificate of interested parties; respond to Tabor email; conf with Labbe regarding new matter number; review local rules regarding PHV application; locate forms on court website; prepare PHV applications for Soumilas and Francis; forward drafts to Tabor; forward drafts to Soumilas and Francis; update case management notebook	2.7	325	\$877.50
Caddell, Michael	10/04/18	Pleadings and Service	Review Sartell correspondence to and from team regarding multiple case numbers;	0.2	1075	\$215.00
Chapman, Cynthia	10/04/18	Pleadings and Service	Review Sartell correspondence to and from team regarding multiple case numbers;	0.1	850	\$85.00
Tabor, Amy	10/04/18	Motion Practice	Correspond via email with co-counsel regarding case status.	0.1	750	\$75.00
Caddell, Michael	10/08/18	Pleadings and Service	Review Kabacinski correspondence to and from Kersh and team regarding pro hac vice paperwork and forwarding same; review Pro Hac Vice Application and Proposed Order Submitted by Sung Gon Kang for Attorney James A. Francis to Appear Pro Hac Vice; review Pro Hac Vice Application and Proposed Order Submitted by Sung Gon Kang for Attorney John Soumilas to Appear Pro Hac Vice; review Kersh correspondence to and from team regarding filed pro hac vice papers and fees;	0.2	1075	\$215.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	10/08/18	Pleadings and Service	Review Kabacinski correspondence to and from Kersh and team regarding pro hac vice paperwork and forwarding same; review Pro Hac Vice Application and Proposed Order Submitted for Attorney James A. Francis to Appear Pro Hac Vice; review Pro Hac Vice Application and Proposed Order Submitted by Attorney John Soumilas to Appear Pro Hac Vice; review Kersh correspondence to and from team regarding filed pro hac vice papers and fees;	0.2	850	\$170.00
Tabor, Amy	10/08/18	Motion Practice	Review and sign motion for admission.	0.1	750	\$75.00
Tabor, Amy	10/08/18	Motion Practice	Conference with Michael Caddell and Cynthia Chapman regarding case status.	0.1	750	\$75.00
Kersh, Kathy	10/08/18	Pleadings and Service	Prepare PHV applications for Soumilas and Francis; review instructions and local rules; efile same; pay fees; email applications to judge in Word; prepare attorney admissions form for Tabor; prepare correspondence to ED of California; download file-stamped copies; forward NEFs to Francis & Mailman	3.3	325	\$1,072.50
Tabor, Amy	10/10/18	Motion Practice	Correspond via email with co-counsel regarding forms required pursuant to local rules.	0.2	750	\$150.00
Caddell, Michael	10/12/18	Pleadings and Service	Review correspondence to and from team regarding scheduling telephone conference;	0.2	1075	\$215.00
Chapman, Cynthia	10/12/18	Pleadings and Service	Review Caddell correspondence to and from team regarding telephone conference;	0.1	850	\$85.00
Caddell, Michael	10/15/18	Pleadings and Service	Review Alvarez correspondence to and from Kersh and team regarding service was affected on Credit Bureau Connection, Inc. on October 4; review Tabor correspondence to Soumilas, Francis, Brennan and Sartelll regarding CBC being served and answer due October 25;	0.2	1075	\$215.00
Chapman, Cynthia	10/15/18	Pleadings and Service	Review Alvarez correspondence to and from Kersh and team regarding service on Credit Bureau Connection, Inc.; review Tabor correspondence to Soumilas, Francis, Brennan and Sartelll regarding service and that answer due October 25;	0.1	850	\$85.00
Tabor, Amy	10/15/18	Pleadings and Service	Review email from porcess server regarding service of process; correspond via email with co-counsel regarding Defendant's answer date.	0.1	750	\$75.00
Caddell, Michael	10/16/18	Pleadings and Service	Review Soumilas correspondence to and from Tabor and team regarding CBC being served and deadline for answer; prepare correspondence to and from team regarding discussing telephone conference; review Kersh correspondence regarding local rules on no deadline to file magistrate consent form; respond;	0.4	1075	\$430.00
Chapman, Cynthia	10/16/18	Pleadings and Service	Review Soumilas correspondence to and from Tabor and team; review Caddell correspondence to and from team regarding telephone conference; review Kersh correspondence regarding local rules on no deadline to file magistrate consent form; review Caddell response;	0.3	850	\$255.00
Caddell, Michael	10/17/18	Pleadings and Service	Review Pro Hac Vice Order signed by Magistrate Judge Sheila K. Oberto on 10/15/2018. Added attorney James A. Francis, PHV for Sung Gon Kang; review Pro Hac Vice Order signed by Magistrate Judge Sheila K. Oberto on 10/15/2018. Added attorney John Soumilas, PHV for Sung Gon Kang;	0.3	1075	\$322.50
Chapman, Cynthia	10/17/18	Pleadings and Service	Review Pro Hac Vice Orders signed by Magistrate Judge Sheila K. Oberto;	0.1	850	\$85.00
Caddell, Michael	10/18/18	Pleadings and Service	Review Kersh correspondence to and from team regarding telephone conference with Tamborelli regarding 10-day extension to respond;	0.2	1075	\$215.00
Chapman, Cynthia	10/18/18	Pleadings and Service	Review Kersh correspondence to and from team regarding telephone conference with Tamborelli regarding 10-day extension;	0.1	850	\$85.00
Kersh, Kathy	10/18/18	Pleadings and Service	Telephone call with Tamborelli regarding extension of response date; conf with Tabor regarding same; return telephone call to grant extension; email to attorneys about same; request stipulation from Tamborelli by phone	0.3	325	\$97.50
Caddell, Michael	10/19/18	Pleadings and Service	Review Kersh correspondence to and from team regarding stipulation from Tamborelli;	0.2	1075	\$215.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	10/19/18	Pleadings and Service	Review Kersh correspondence to and from team regarding stipulation from Tamborelli;	0.1	850	\$85.00
Caddell, Michael	10/24/18	Pleadings and Service	Review Kersh correspondence to and from team regarding telephone conference with Tamborelli regarding an extension to November 9 to file his response on behalf of Credit Bureau Connection; review Kersh correspondence to and from team forwarding Tamborelli proposed stipulation and order; respond;	0.3	1075	\$322.50
Chapman, Cynthia	10/24/18	Pleadings and Service	Review Kersh correspondence to and from team regarding extension to file response on behalf of Credit Bureau Connection; review Kersh correspondence to and from team forwarding Tamborelli proposed stipulation and order; review Caddell response;	0.2	850	\$170.00
Kersh, Kathy	10/24/18	Pleadings and Service	Telephone calls with Tamborelli; review stipulation and proposed order; forward same to attorneys; review ED of CA local rules on stipulations	0.7	325	\$227.50
Caddell, Michael	10/25/18	Pleadings and Service	Review Stipulation and Proposed Order for Credit Bureau Connection by Credit Bureau Connection, Inc.. Attorney Tamborelli, John Vincent added;	0.1	1075	\$107.50
Chapman, Cynthia	10/25/18	Pleadings and Service	Review Stipulation and Proposed Order for Credit Bureau Connection by Credit Bureau Connection, Inc.;	0.1	850	\$85.00
Kersh, Kathy	10/25/18	Pleadings and Service	Respond to Tamborelli email; telephone call with same; email to Tabor; download filestamped copies of Stipulation and proposed Order	0.3	325	\$97.50
Caddell, Michael	10/26/18	Pleadings and Service	Review Order Extending Time for Defendant Credit Bureau Connection Inc., to File Responsive Pleading to Plaintiff's Complaint, Signed by Magistrate Judge Sheila K. Oberto on 10/26/2018;	0.1	1075	\$107.50
Chapman, Cynthia	10/26/18	Pleadings and Service	Review Order Extending Time for Defendant Credit Bureau Connection Inc., to File Responsive Pleading to Plaintiff's Complaint, Signed by Magistrate Judge Sheila K. Oberto on 10/26/2018;	0.1	850	\$85.00
Kersh, Kathy	10/30/18	Pleadings and Service	Review and scan Return of Service form	0.1	325	\$32.50
Caddell, Michael	10/31/18	Pleadings and Service	Review Kersh correspondence to and from team regarding receiving return of service on Credit Bureau Connection; respond;	0.2	1075	\$215.00
Chapman, Cynthia	10/31/18	Pleadings and Service	Review Kersh correspondence to and from team regarding receiving return of service on Credit Bureau Connection; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	11/09/18	Motion Practice	Review Motion to Dismiss by Credit Bureau Connection, Inc.. Motion Hearing set for 12/10/2018 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii; review Memorandum by Credit Bureau Connection, Inc. in Support of Motion to Dismiss; review Declaration of Darin Larsen in Support; review Request for Judicial Notice; prepare correspondence to and from team regarding Larsen declaration and regarding scheduling telephone conference;	1.1	1075	\$1,182.50
Chapman, Cynthia	11/09/18	Motion Practice	Review Motion to Dismiss by Credit Bureau Connection, Inc. and Motion Hearing set for 12/10/2018; review Memorandum by Credit Bureau Connection, Inc. in Support of Motion to Dismiss; review Declaration of Darin Larsen in Support; review Request for Judicial Notice; review Caddell correspondence to and from team regarding Larsen declaration and regarding scheduling telephone conference;	1.4	850	\$1,190.00
Tabor, Amy	11/09/18	Motion Practice	Review motion to dismiss; calendar deadlines; correspond via email with co-counsel regarding response to motion to dismiss.	0.5	750	\$375.00
Kersh, Kathy	11/09/18	Pleadings and Service	Download and review defendant response to complaint	0.2	325	\$65.00
Caddell, Michael	11/13/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding telephone conference; t/conf Team;	1.0	1075	\$1,075.00
Chapman, Cynthia	11/13/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding telephone conference; t/conf Team;	1.0	850	\$850.00
Tabor, Amy	11/13/18	Depositions	Teleconference with co-counsel regarding response to Motion to Dismiss; prepare email to opposing counsel regarding request for deposition and to continue hearing.	0.2	750	\$150.00
Caddell, Michael	11/20/18	Depositions	Review multiple Tabor correspondence to and from team regarding dates to depose Larsen and regarding extension on our response; review Tabor correspondence forwarding Tamborelli response; respond; review multiple Chapman response;	0.7	1075	\$752.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	11/20/18	Depositions	Review multiple Tabor correspondence to and from team regarding dates to depose Larsen and regarding response extension; review Tabor correspondence forwarding Tamborelli response; review Caddell response; prepare multiple responses;	0.9	850	\$765.00
Tabor, Amy	11/20/18	Depositions	Outline response to Motion to Dismiss; correspond via email with opposing counsel regarding request for deposition and to continue hearing.	1.0	750	\$750.00
Kersh, Kathy	11/20/18	Pleadings and Service	Review email from Chapman and respond; telephone call with Tabor; review website regarding holiday hours, telephone call to clerk's office; email to Tabor	0.3	325	\$97.50
Tabor, Amy	11/21/18	Motion Practice	Draft response to Motion to Dismiss.	4.0	750	\$3,000.00
Tabor, Amy	11/22/18	Motion Practice	Draft response to Motion to Dismiss.	5.5	750	\$4,125.00
Caddell, Michael	11/23/18	Depositions	Review Tabor correspondence to and from Soumilas, and team regarding extension and deposition; review Chapman response;	0.3	1075	\$322.50
Chapman, Cynthia	11/23/18	Depositions	Review Tabor correspondence to and from Soumilas, and team regarding extension and deposition; prepare response;	0.3	850	\$255.00
Tabor, Amy	11/23/18	Motion Practice	Draft response to Motion to Dismiss.	2.5	750	\$1,875.00
Tabor, Amy	11/25/18	Motion Practice	Revise response to Motion to Dismiss.	4.0	750	\$3,000.00
Caddell, Michael	11/26/18	Pleadings and Service	Review multiple Tabor correspondence to and from team regarding draft response to CBC's motion to dismiss and forwarding document on same; review and prepare multiple responses; review multiple Chapman response; review filed Response by Sung Gon Kang to [10] Motion to Dismiss;	0.9	1075	\$967.50
Chapman, Cynthia	11/26/18	Pleadings and Service	Review multiple Tabor correspondence to and from team regarding draft response to CBC's motion to dismiss and forwarding document on same; review multiple Caddell responses; prepare multiple responses; review Response to Motion to Dismiss;	0.8	850	\$680.00
Tabor, Amy	11/26/18	Motion Practice	Finalize and file response to Motion to Dismiss.	5.0	750	\$3,750.00
Kersh, Kathy	11/26/18	Pleadings and Service	Download recently filed documents	0.1	325	\$32.50
Kersh, Kathy	11/27/18	Pleadings and Service	Review Ishii local rules; prepare correspondence and courtesy copies for Ishii, trip to post office to mail by priority mail	1.0	325	\$325.00
Caddell, Michael	11/28/18	Pleadings and Service	Review Tabor correspondence regarding Kang credit report; respond; review Chapman response;	0.3	1075	\$322.50
Chapman, Cynthia	11/28/18	Pleadings and Service	Review Tabor correspondence regarding Kang credit report; review Caddell response; prepare response;	0.2	850	\$170.00
Labbe, Felicia	11/28/18	Motion Practice	Conference with Tabor regarding preparing December 10 hearing notebook to send to Caddell and Chapman; start printing documents for notebook;	1.5	175	\$262.50
Caddell, Michael	12/03/18	Pleadings and Service	Review Reply by Credit Bureau Connection, Inc. to Response to [10] Motion to Dismiss;	0.6	1075	\$645.00
Chapman, Cynthia	12/03/18	Pleadings and Service	Review Credit Bureau Connection, Inc.'s Reply to Response to Motion to Dismiss;	0.6	850	\$510.00
Tabor, Amy	12/03/18	Motion Practice	Review reply in support of motion to dismiss; assemble hearing notebook.	0.7	750	\$525.00
Kersh, Kathy	12/03/18	Pleadings and Service	Review NEF; download document from court website; review Tabor and Labbe emails	0.2	325	\$65.00
Labbe, Felicia	12/03/18	Motion Practice	Continue to print documents for hearing notebook; correspondence to and from Tabor regarding same; draft TOC and send to Tabor, Kersh;	1.0	175	\$175.00
Caddell, Michael	12/04/18	Motion Practice	Review Labbe correspondence to and from team regarding motion to dismiss hearing notebook; respond;	0.4	1075	\$430.00
Chapman, Cynthia	12/04/18	Motion Practice	Review Labbe correspondence to and from team regarding motion to dismiss hearing notebook; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	12/04/18	Motion Practice	Assemble notebook for hearing on motion to dismiss.	0.5	750	\$375.00
Labbe, Felicia	12/04/18	Pleadings and Service	Conference with Tabor regarding changes to TOC; email Caddell and Chapman draft of the TOC for their review;	0.5	175	\$87.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	12/05/18	Motion Practice	Review Labbe correspondence regarding hearing notebook; respond; prepare for hearing; review Tabor correspondence to and from Soumilas and team regarding hearing still on; review Chapman response; review Minute Order (Text Entry Only) The Court has deemed Motion to Dismiss noticed for hearing on 12/10/2018, before Senior District Judge Anthony W. Ishii, suitable for decision without oral argument pursuant to Local Rule 230(g), And, as such, the hearing on same is Vacated and the matter will be taken under submission as of that date, Minute order signed by District Judge Anthony W. Ishii on 12/5/2018; prepare correspondence to and from team regarding hearing cancelled; prepare correspondence to and from Soumilas, Francis regarding written discovery and deposition notices and regarding scheduling telephone conference; conf w/ Chapman;	2.1	1075	\$2,257.50
Chapman, Cynthia	12/05/18	Motion Practice	Review Labbe correspondence regarding hearing notebook; review Caddell response; review Tabor correspondence to and from Soumilas and team regarding hearing; prepare response; review Minute Order; review Caddell correspondence to and from team regarding hearing cancelled; review Caddell correspondence to and from Soumilas, Francis regarding written discovery and deposition notices and regarding scheduling telephone conference; conf with Caddell;	0.9	850	\$765.00
Tabor, Amy	12/05/18	Motion Practice	Conference with Michael Caddell and Cynthia Chapman regarding hearing preparation; correspond via email with John Soumilas regarding hearing preparation.	0.5	750	\$375.00
Labbe, Felicia	12/05/18	Motion Practice	Prepare MTD Hearing Notebook for Caddell and Chapman; conference with Tabor regarding same; correspondence to and from Tabor regarding same;	1.5	175	\$262.50
Caddell, Michael	12/06/18	Pleadings and Service	Review Soumilas correspondence to and from team regarding scheduling telephone conference; respond;	0.2	1075	\$215.00
Chapman, Cynthia	12/06/18	Pleadings and Service	Review Soumilas correspondence to and from team regardin telephone conference; review Caddell response;	0.1	850	\$85.00
Tabor, Amy	12/06/18	Written Discovery	Correspond via email with co-counsel regarding order cancelling hearing and teleconference to discuss discovery.	0.1	750	\$75.00
Caddell, Michael	12/07/18	Pleadings and Service	Prepare correspondence to team regarding scheduling telephone conference;	0.1	1075	\$107.50
Chapman, Cynthia	12/07/18	Pleadings and Service	Review Caddell correspondence to team regarding telephone conference;	0.1	850	\$85.00
Caddell, Michael	12/08/18	Pleadings and Service	Review Francis correspondence to team regarding scheduling telephone conference;	0.1	1075	\$107.50
Chapman, Cynthia	12/08/18	Pleadings and Service	Review Francis correspondence to team regarding telephone conference;	0.1	850	\$85.00
Caddell, Michael	12/09/18	Pleadings and Service	Prepare correspondence to Francis and team regarding scheduling telephone conference;	0.1	1075	\$107.50
Chapman, Cynthia	12/09/18	Pleadings and Service	Review Caddell correspondence to Francis and team regarding telephone conference;	0.1	850	\$85.00
Caddell, Michael	12/10/18	Pleadings and Service	T/conf Team; conf with Chapman;	1.0	1075	\$1,075.00
Chapman, Cynthia	12/10/18	Pleadings and Service	T/conf Team; conf with Caddell;	1.2	850	\$1,020.00
Caddell, Michael	12/11/18	Pleadings and Service	T/C Francis;	0.5	1075	\$537.50
Caddell, Michael	12/12/18	Written Discovery	Review Francis correspondence to Tamborelli and team regarding scheduling telephone conference regarding scheduling and discovery matters pursuant to Rule 26f; prepare correspondence to and from Francis and team regarding scheduling telephone conference regarding review/discuss written discovery and deposition notices;	0.6	1075	\$645.00
Chapman, Cynthia	12/12/18	Written Discovery	Review Francis correspondence to Tamborelli and team regarding scheduling and discovery matters pursuant to Rule 26f; review Caddell correspondence to and from Francis and team regarding scheduling telephone conference regarding review/discuss written discovery and deposition notices;	0.3	850	\$255.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	12/13/18	Written Discovery	Review multiple Soumilas correspondence to and from team regarding scheduling telephone conference regarding review/discuss written discovery and deposition notices; prepare multiple responses;	0.6	1075	\$645.00
Chapman, Cynthia	12/13/18	Written Discovery	Review multiple Soumilas correspondence to and from team regarding scheduling telephone conference regarding review/discuss written discovery and deposition notices; review multiple Caddell responses;	0.2	850	\$170.00
Caddell, Michael	12/18/18	Depositions	Review Francis correspondence regarding scheduling telephone conference regarding discussion regarding scheduling and discovery matters pursuant to Rule 26f;	0.2	1075	\$215.00
Chapman, Cynthia	12/18/18	Depositions	Review Francis correspondence regarding scheduling telephone conference to organize scheduling and discovery matters pursuant to Rule 26f;	0.1	850	\$85.00
Caddell, Michael	01/05/19	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli, and team forwarding draft parties' Joint Scheduling Report and regarding scheduling telephone conference; prepare multiple responses; prepare correspondence to and from team regarding scheduling telephone conference on Thursday before Tamborelli telephone conference; conf w/ Chapman;	0.8	1075	\$860.00
Chapman, Cynthia	01/05/19	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team forwarding draft parties' Joint Scheduling Report and regarding scheduling telephone conference; review multiple Caddell responses; review Caddell correspondence to and from team regarding scheduling telephone conference on Thursday before Tamborelli telephone conference; conf with Caddell;	0.6	850	\$510.00
Caddell, Michael	01/07/19	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding new time for telephone conference; prepare correspondence to and from Sartell regarding new telephone conference date; review Tamborelli correspondence to and from counsel and team regarding 7am pst conference call;	0.5	1075	\$537.50
Chapman, Cynthia	01/07/19	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding telephone conference; review Caddell correspondence to and from Sartell regarding same; review Tamborelli correspondence to and from counsel and team regarding conference call;	0.2	850	\$170.00
Caddell, Michael	01/08/19	Written Discovery	Review multiple Tamborelli correspondence to and from Sartell, counsel and team regarding draft joint scheduling report; review multiple Tamborelli correspondence to and from Sartell, counsel and team forwarding draft joint scheduling report and regarding time for telephone conference; t/conf w/ Tamborelli, Team; review multiple Chapman responses; review Sartell correspondence to and from team regarding draft co-counsel conference regarding discovery and forwarding draft joint scheduling order; review Francis correspondence regarding covering next week's conference; review Chapman response; review multiple Sartell correspondence to and from Tamborelli, counsel and team forwarding reconciled joint report; review Sartell correspondence regarding filing; respond; review filed Joint Scheduling Report by Sung Gon Kang;	1.8	1075	\$1,935.00
Chapman, Cynthia	01/08/19	Written Discovery	Review multiple Tamborelli correspondence to and from Sartell, counsel and team regarding draft joint scheduling report; review multiple Tamborelli correspondence to and from Sartell, counsel and team forwarding draft joint scheduling report and regarding time for telephone conference; prepare multiple responses; review Sartell correspondence to and from team regarding draft co-counsel conference regarding discovery and forwarding draft joint scheduling order; review Francis correspondence regarding covering next week's conference; prepare response; review multiple Sartell correspondence to and from Tamborelli, counsel and team forwarding reconciled joint report; review Sartell correspondence regarding filing; review Caddell response;	1.8	850	\$1,530.00
Tabor, Amy	01/08/19	Written Discovery	Review and file joint scheduling report.	0.2	750	\$150.00
Caddell, Michael	01/09/19	Pleadings and Service	Review Minute Order regarding the pending motion to dismiss [10], the Scheduling Conference currently set for 1/15/2019, is Continued to 3/12/2019, at 9:45 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto, The parties Shall file their joint scheduling report containing their proposal for the remaining scheduling deadlines by no later than 3/7/2019, signed by Magistrate Judge Sheila K. Oberto on 1/9/2019; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	01/09/19	Pleadings and Service	Review Minute Order regarding pending motion to dismiss, scheduling conference, and joint scheduling report deadline; conf with Caddell;	0.2	850	\$170.00
Kersh, Kathy	01/09/19	Pleadings and Service	Review e-filing and download same to network; review Judge Ishii's policies on courtesy copies; email to Tabor regarding same; download Word copy to network and email same to Judge Ishii	1.0	325	\$325.00
Caddell, Michael	01/10/19	Written Discovery	Review Sartell correspondence to and from team forwarding draft discovery for telephone conference; review Sartell correspondence to and from team regarding brief conversation regarding revised drafts of discovery;	0.4	1075	\$430.00
Caddell, Michael	02/05/19	Written Discovery	Prepare correspondence to Tabor regarding status of co-counsel conference regarding discovery and forwarding draft discovery requests;	0.2	1075	\$215.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	02/05/19	Written Discovery	Review Caddell correspondence to Tabor regarding status of co-counsel conference regarding discovery and forwarding draft discovery requests;	0.1	850	\$85.00
Caddell, Michael	02/06/19	Depositions	Review Tabor correspondence to and from Sartell and team regarding discovery planning; respond; review Tabor correspondence regarding status of co-counsel conference regarding discovery; respond; review Sartell correspondence to team regarding plaintiff's 30(b)(1) notice of deposition and forwarding document on same;	0.6	1075	\$645.00
Chapman, Cynthia	02/06/19	Depositions	Review Tabor correspondence to and from Sartell and team regarding discovery planning; review Caddell response; review Tabor correspondence regarding status of co-counsel conference regarding discovery; review Caddell response; review Sartell correspondence to team regarding plaintiff's 30(b)(1) notice of deposition;	0.4	850	\$340.00
Caddell, Michael	02/11/19	Depositions	Review multiple Sartell correspondence to and from team regarding discovery planning and date, time and location for the notice of 30(b)(1) deposition; prepare multiple responses; review Kabacinski correspondence to counsel and team forwarding Plaintiff's discovery requests;	0.5	1075	\$537.50
Chapman, Cynthia	02/11/19	Depositions	Review multiple Sartell correspondence to and from team regarding discovery planning and notice of 30(b)(1) deposition; review multiple Caddell responses; review Kabacinski correspondence to counsel and team forwarding Plaintiff's discovery requests;	0.3	850	\$255.00
Caddell, Michael	02/26/19	Depositions	Review Tamborelli correspondence to and from counsel and team regarding moving the deposition to a more convenient date; review Tamborelli correspondence forwarding Defendant Credit Bureau Connection Inc.'s Objections to Plaintiff's Notice of Deposition of Individual Who Obtained the Information Concerning the Office of Foreign Assets Control's Specially Designated Nationals and Blocked Persons List; review Sartell correspondence to and from Kabacinski and team regarding other days on which you could depose this witness in early March;	0.4	1075	\$430.00
Chapman, Cynthia	02/26/19	Depositions	Review Tamborelli correspondence to and from counsel and team regarding deposition; review Tamborelli correspondence forwarding Defendant Credit Bureau Connection Inc.'s Objections to Plaintiff's Notice of Deposition; review Sartell correspondence to and from Kabacinski and team regarding depositions;	0.2	850	\$170.00
Caddell, Michael	02/27/19	Depositions	Prepare correspondence to and from Sartell, Kabacinski and team regarding providing new dates for deposition; prepare correspondence to and from Sartell, Kabacinski and team regarding dates for deposition;	0.3	1075	\$322.50
Chapman, Cynthia	02/27/19	Depositions	Review Caddell correspondence to and from Sartell, Kabacinski and team regarding providing new dates for deposition; review Caddell correspondence to and from Sartell, Kabacinski and team regarding dates for deposition;	0.1	850	\$85.00
Caddell, Michael	02/28/19	Written Discovery	Review Johnson correspondence regarding expert search; prepare correspondence to and from team;	0.4	1075	\$430.00
Chapman, Cynthia	02/28/19	Written Discovery	Review Johnson correspondence regarding expert search; review Caddell correspondence to and from team;	0.1	850	\$85.00
Caddell, Michael	03/02/19	Depositions	Review Tabor correspondence regarding if 30(b)(6) deposition going forward on Monday and if documents are needed; respond;	0.3	1075	\$322.50
Chapman, Cynthia	03/02/19	Depositions	Review Tabor correspondence regarding if 30(b)(6) deposition and; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	03/05/19	Written Discovery	Review Tamborelli correspondence to and from Kabacinski and team regarding forwarding Word versions of discovery;	0.1	1075	\$107.50
Chapman, Cynthia	03/05/19	Written Discovery	Review Tamborelli correspondence to and from Kabacinski and team regarding forwarding discovery;	0.1	850	\$85.00
Kersh, Kathy	03/05/19	Pleadings and Service	Prepare phone list; prepare case management index; update case management notebook; download updated docket sheet	0.5	325	\$162.50
Caddell, Michael	03/06/19	Written Discovery	Review Tabor correspondence regarding discovery planning;	0.1	1075	\$107.50
Chapman, Cynthia	03/06/19	Written Discovery	Review Tabor correspondence regarding discovery planning;	0.1	850	\$85.00
Tabor, Amy	03/06/19	Motion Practice	Review CBC website; correspond via email with Kathy Kersh regarding capture of website screenshots.	1.0	750	\$750.00
Kersh, Kathy	03/06/19	Pleadings and Service	Review email from Tabor; capture screenshots from CBC website; download same; respond to Tabor email	1.0	325	\$325.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	03/07/19	Pleadings and Service	Review Minute Order regarding the pending Motion to Dismiss the Scheduling Conference currently set for 3/12/2019, is Continued to 6/13/2019, at 9:45 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto, the parties Shall file their joint scheduling report 7 days prior to the conference, signed by Magistrate Judge Sheila K. Oberto on 3/7/2019; prepare correspondence to Tabor regarding sending documents and calendaring new status conference date and new deadline for the report;	0.2	1075	\$215.00
Chapman, Cynthia	03/07/19	Pleadings and Service	Review Minute Order re joint scheduling report; review Caddell correspondence to Tabor regarding sending documents and calendaring new status conference date and new deadline for the report;	0.1	850	\$85.00
Kersh, Kathy	03/07/19	Pleadings and Service	Review order from court; update calendar; download file-stamped copy	0.2	325	\$65.00
Caddell, Michael	03/08/19	Depositions	Review Tamborelli correspondence to and from Sartell, counsel and team regarding leaving voice mail regarding the discovery and requesting additional seven days to respond and regarding the court has continued Tuesday's hearing; review Tabor correspondence forwarding documents and regarding calendaring deadlines in preparation for the deposition;	0.4	1075	\$430.00
Chapman, Cynthia	03/08/19	Depositions	Review Tamborelli correspondence to and from Sartell, counsel and team regarding discovery issues and hearing; review Tabor correspondence forwarding documents and regarding calendaring deadlines in preparation for the deposition;	0.3	850	\$255.00
Tabor, Amy	03/08/19	Depositions	Correspond vial email with Michael Caddell regarding deposition preparation.	0.2	750	\$150.00
Caddell, Michael	03/09/19	Written Discovery	Review Tamborelli correspondence to counsel and team regarding the discovery and asked for an additional seven days to respond;	0.1	1075	\$107.50
Chapman, Cynthia	03/09/19	Written Discovery	Review Tamborelli correspondence to counsel and team regarding the discovery additional time to respond;	0.1	850	\$85.00
Caddell, Michael	03/11/19	Written Discovery	Prepare multiple correspondence to and from Sartell and team regarding agreeing to another seven days for Tamborelli to respond;	0.3	1075	\$322.50
Chapman, Cynthia	03/11/19	Written Discovery	Review multiple Caddell correspondence to and from Sartell and team regarding agreeing additional tome to respond;	0.1	850	\$85.00
Kersh, Kathy	03/11/19	Pleadings and Service	revise case management index; update case management notebook	1.0	325	\$325.00
Caddell, Michael	03/19/19	Depositions	Prepare correspondence to and from Sartell, and team regarding dates for deposition; review Sartell correspondence to and from Tamborelli and team regarding Defendant's responses to Plaintiff's Initial set of discovery requests and regarding availability of the witness noticed for deposition concerning the acquisition of OFAC data on April 3, 8, 10, or 15; review Order Denying Motion to Dismiss and Request for Judicial Notice signed by District Judge Anthony W. Ishii on 03/19/2019. It is Hereby Ordered that Defendant's Rule 12(b)(6) motion to dismiss Plaintiff's causes of action (Doc. No. 10) is Denied. Defendant's request for judicial notice (Doc. No. 13) is Denied; prepare correspondence to and from Francis, Soumilas and team regarding same; review Chapman response; conf w/ Chapman;	1.2	1075	\$1,290.00
Chapman, Cynthia	03/19/19	Depositions	Review Caddell correspondence to and from Sartell, and team regarding dates for deposition; review Sartell correspondence to and from Tamborelli and team regarding Defendant's responses to Plaintiff's Initial set of discovery requests and regarding deposition dates; review Sartell correspondence to and from Tamborelli and team regarding discovery issues; review Order Denying Motion to Dismiss and Request for Judicial Notice; review Caddell correspondence to and from Francis, Soumilas and team regarding same; prepare response; conference with Caddell;	1.2	850	\$1,020.00
Caddell, Michael	03/20/19	Written Discovery	Review Sartell correspondence to and from team regarding Order on Motion to Dismiss and forwarding document on same; review Chapman response; prepare multiple correspondence to and from Sartell, Francis and team regarding circling back to Tamborelli next week on the discovery issues;	0.8	1075	\$860.00
Chapman, Cynthia	03/20/19	Written Discovery	Review Sartell correspondence to and from team regarding Order on Motion to Dismiss and forwarding document on same; prepare response; review multiple Caddell correspondence to and from Sartell, Francis and team regarding circling back to Tamborelli next week on the discovery issues;	0.3	850	\$255.00
Kersh, Kathy	03/20/19	Pleadings and Service	Review and download order denying dismissal	0.1	325	\$32.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	03/22/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding request to meet and confer regarding Plaintiff's Discovery; review Sartell correspondence to and from team forwarding Defendant's Responses; review Sartell correspondence to Tamborelli and team regarding scheduling meet and confer regarding Defendant's objections and responses and regarding advise as to date on which defendant's witness will be available for deposition in the first two weeks of April; respond; conf w/ Chapman;	0.7	1075	\$752.50
Chapman, Cynthia	03/22/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding request to meet and confer regarding Plaintiff's Discovery; review Sartell correspondence to and from team forwarding Defendant's Responses; review Sartell correspondence to Tamborelli and team regarding scheduling meet and confer regarding Defendant's objections and responses and regarding advise as to date on which defendant's witness will be available for deposition in the first two weeks of April; review Caddell response; conference with Caddell;	0.6	850	\$510.00
Caddell, Michael	03/25/19	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding objections will not be removed and regarding scheduling meet and confer regarding Plaintiff's discovery; review Sartell correspondence to and counsel and team regarding not able to participate at 4pm tomorrow; prepare multiple responses; conf w/ Chapman;	0.5	1075	\$537.50
Chapman, Cynthia	03/25/19	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding objections to Plaintiff's discovery; review Sartell correspondence regarding discovery issue; review multiple Caddell responses; conf w/ Caddell;	0.3	850	\$255.00
Tabor, Amy	03/25/19	Depositions	Review email correspondence regarding deposition scheduling.	0.1	750	\$75.00
Caddell, Michael	03/27/19	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding unable to do meet and confer until Monday at 11am PST; review multiple Sartell correspondence to and from team regarding rescheduling meet and confer; review Sartell correspondence to and from Tamborelli and team regarding rescheduled date and time for meet and confer; respond;	0.4	1075	\$430.00
Chapman, Cynthia	03/27/19	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding meet and confer issue; review multiple Sartell correspondence to and from team regarding rescheduling meet and confer; review Sartell correspondence to and from Tamborelli and team regarding rescheduled date and time for meet and confer; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	03/27/19	Motion Practice	Correspond via email with co-counsel and opposing counsel regarding scheduling meet and confer.	0.1	750	\$75.00
Caddell, Michael	04/01/19	Written Discovery	Review Sartell correspondence to Tamborelli and team forwarding meet and confer dial-in number; review Sartell correspondence to and from Tamborelli and team regarding follow up on meet and confer agreeing to resume our efforts to meet and confer regarding Plaintiff's discovery requests on Wednesday, April 3, 2019 at 1pm PST; t/conf w/ Tamborelli, Sartell, Tabor; conf w/ Chapman;	1.0	1075	\$1,075.00
Chapman, Cynthia	04/01/19	Written Discovery	Review Sartell correspondence to Tamborelli and team regarding meet and confer; review Sartell correspondence to and from Tamborelli and team regarding follow up on meet and confer regarding Plaintiff's discovery requests; conference with Caddell;	0.5	850	\$425.00
Tabor, Amy	04/01/19	Written Discovery	Teleconference with opposing counsel regarding status of discovery requests.	0.5	750	\$375.00
Caddell, Michael	04/03/19	Depositions	Prepare correspondence to and from Sartell and team regarding drafting a follow-up letter/email to Tamborelli detailing our offer to limit the time scope of our discovery requests; review Sartell correspondence to and from Tamborelli and team forwarding correspondence in follow up to our telephonic meeting and conferral; respond; prepare correspondence to and from Kersh and team forwarding same and regarding reserving conference room for Larsen deposition on April 30 in Fresno; review Answer with Jury Demand by Credit Bureau Connection, Inc.; t/conf Sartell, Tabor; prepare for deposition;	1.5	1075	\$1,612.50
Chapman, Cynthia	04/03/19	Depositions	Review Caddell correspondence to and from Sartell and team regarding drafting a follow-up letter/email to Tamborelli detailing offer to limit the time scope of Plaintiff's discovery requests; review Sartell correspondence to and from Tamborelli and team forwarding correspondence in follow up to telephonic meeting and conferral; review Caddell response; review Caddell correspondence to and from Kersh and team forwarding same and regarding deposition issues; review Answer with Jury Demand by Credit Bureau Connection, Inc.;	0.8	850	\$680.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/04/19	Depositions	Review Sartell correspondence to and from team regarding Answer and thirty-five affirmative defenses; conf w/ Chapman; respond; request research from Tabor regarding MTD defenses; review Kersh correspondence to and from team regarding needing hotel room for Larsen deposition; respond; review multiple Kersh correspondence to and from team regarding hotel preference for deposition;	1.1	1075	\$1,182.50
Chapman, Cynthia	04/04/19	Depositions	Review Sartell correspondence to and from team regarding Answer and affirmative defenses; review Caddell response; review Kersh correspondence to and from team regarding deposition issues; review Caddell response; review multiple Kersh correspondence to and from team regarding deposition;	0.8	850	\$680.00
Tabor, Amy	04/04/19	Pre-suit Investigation	Review answer; review correspondence from co-counsel regarding affirmative defenses raised in answer.	0.1	750	\$75.00
Kersh, Kathy	04/04/19	Depositions	Review hotels in Fresno area; review email from Labbe about hotel memberships; email to Stratos regarding deposition date and potential meeting site needed; internet research and telephone calls to hotels; review Stratos response; email to Caddell regarding meeting room choices; telephone call to reserve room at Marriott; begin drafting deposition notice	3.5	325	\$1,137.50
Kersh, Kathy	04/05/19	Depositions	Review agreement and emails from Courtyard by Marriott and respond; print and fill out agreement; review Accurant bill; review Accurant billing detail; print bill and detail; pay Accurant bill	0.5	325	\$162.50
Caddell, Michael	04/08/19	Depositions	Review Tabor correspondence to and from team regarding 9th Circuit and forwarding Opinion regarding Twombly's plausibility standard did not apply to affirmative defenses, applying a fair notice standard instead; prepare multiple responses; review Sartell correspondence to and from team regarding drafting a motion to compel; respond; review multiple Kersh correspondence to and from team regarding reserving the deposition room at the Courtyard by Marriott; prepare multiple responses; review Sartell correspondence to and from team regarding , we need to file and serve a notice of motion and motion scheduling the hearing date for April 29 and Darin Larsen has been made available the following day, April 30 and forwarding draft motion to schedule hearing regarding discovery dispute and draft notice of motion; review Tabor correspondence to and from Sartell and team forwarding revised notice of motion and motion; review Motion to Compel by Sung Gon Kang. Motion Hearing set for 4/29/2019 at 01:30 PM in Courtroom 7 (SKO) before District Judge Anthony W. Ishii;	1.8	1075	\$1,935.00
Chapman, Cynthia	04/08/19	Depositions	Review Tabor correspondence to and from team regarding Judge Ishii found that Twombly's plausibility standard did not apply to affirmative defenses; review multiple Caddell responses; review Sartell correspondence to and from team regarding drafting a motion to compel; review Caddell response; review multiple Kersh correspondence to and from team regarding reserving the deposition room at the Courtyard by Marriott; review multiple Caddell responses; review Sartell correspondence to and from team regarding hearing date; review Tabor correspondence to and from Sartell and team forwarding revised notice of motion and motion;	0.8	850	\$680.00
Tabor, Amy	04/08/19	Written Discovery	Draft and file notice of motion and motion to compel; correspond via email with Jordan Sartell regarding motion to compel.	4.0	750	\$3,000.00
Kersh, Kathy	04/08/19	Depositions	Review agreement from Marriott; email to catering manager for updated agreement; email to Caddell; review response; sign agreement; scan document to network; email agreement to Marriott and fill out credit card information to hold room; revise deposition notice; draft correspondence to opposing counsel	1.8	325	\$585.00
Caddell, Michael	04/09/19	Depositions	Review Kersh correspondence regarding laptop with Realtime and LiveNotes for deposition; respond; review Kersh correspondence to and from team regarding draft notice of oral deposition for Larsen and forwarding document on same;	0.4	1075	\$430.00
Chapman, Cynthia	04/09/19	Depositions	Review Kersh correspondence regarding laptop with Realtime and LiveNotes for deposition; review Caddell response; review Kersh correspondence to and from team regarding draft notice of oral deposition for Larsen and forwarding document on same;	0.2	850	\$170.00
Tabor, Amy	04/09/19	Written Discovery	Review and comment on notice of deposition; prepare for and participate in telephone conference with magistrate judge regarding motion to compel; draft and file notice of withdrawal of motion to compel; calendar telephonic hearing deadlines.	3.5	750	\$2,625.00
Kersh, Kathy	04/09/19	Depositions	Review deposition notice and revise same; revise correspondence; serve depo notice by email and certified mail RRR; review email from Tamborelli; download discovery requests; emails to Caddell regarding deposition location and notice; send depo notice to Stratos Legal by email	3.0	325	\$975.00
Labbe, Felicia	04/09/19	Depositions	Correspondence to and from Kersh regarding formatting Larsen deposition notice; format notice and send to Kersh;	0.8	175	\$140.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/10/19	Depositions	Review multiple Kusamura correspondence to counsel and team regarding Judge Oberto would like to have a short telephonic conference regarding the recently filed Motion to Compel this afternoon between 1:30 p.m. - 3:30 p.m.; prepare multiple responses; review Sartell correspondence to and from team regarding not able to join conference; t/conf w/ Court, et al.; prepare correspondence to and from Kersh regarding Realtime and and laptop for deposition on the 30th; review Kersh correspondence to and from team forwarding draft deposition notice of Larsen; respond; review Kersh correspondence to Tamborelli, counsel and team forwarding Plaintiff's Notice of Oral and Videotaped Deposition of Darin Larsen; review Tamborelli correspondence to and from counsel and team forwarding courtesy copy of discovery; review multiple Sartell correspondence to and from team regarding 26(a)(1) disclosures; prepare multiple responses; prepare correspondence to and from Sartell, Tabor regarding quick report regarding what the magistrate wants; review Tabor correspondence forwarding draft notice of withdrawal; respond; review Notice of Withdrawal by Sung Gon Kang re [22] Motion to Compel; review Minute Order regarding Plaintiff's Motion to Compel (Doc. [22].) telephonic informal discovery dispute conference is SET for Thursday, April 25, 2019, at 1:30 PM before Magistrate Judge Sheila K. Oberto, prior to that date, the parties shall continue to meet and confer regarding the dispute and shall each serve and submit a 2-3 page summary of any remaining disputed items by no later than Thursday, April 18, 2019; review Sartell correspondence regarding inviting Tamborelli to another conference implying strongly that he should commit his refusal to supplement the Norm Reeves doc request to writing in his response to same; respond;	1.3	1075	\$1,397.50
Chapman, Cynthia	04/10/19	Depositions	Review multiple Kusamura correspondence to counsel and team regarding Judge Oberto request to hold telephonic conference regarding Motion to Compel; review multiple Caddell responses; review Sartell correspondence to and from team; t/conf w/ Court, et al.; review Caddell correspondence to and from Kersh regarding Realtime and laptop for deposition; review Kersh correspondence to and from team forwarding draft deposition notice of Larsen; review Caddell response; review Kersh correspondence to Tamborelli, counsel and team forwarding Plaintiff's Notice of Oral and Videotaped Deposition of Darin Larsen; review Tamborelli correspondence to and from counsel and team forwarding courtesy copy of discovery; review Caddell correspondence to and from Sartell, Tabor regarding quick report regarding Magistrate; review Tabor correspondence forwarding draft notice of withdrawal; review Caddell response; review Notice of Withdrawal re Motion to Compel; review Minute Order regarding Plaintiff's Motion to Compel; review Sartell correspondence regarding discovery dispute; review Caddell response;	0.5	850	\$425.00
Tabor, Amy	04/10/19	Written Discovery	Review written discovery served by defendant; calendar deadlines; correspond via email with co-counsel regarding discovery deadlines; calendar deadlines.	0.5	750	\$375.00
Kersh, Kathy	04/10/19	Depositions	Review deposition confirmation from court reporter	0.1	325	\$32.50
Caddell, Michael	04/11/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding availability on Monday the 15th or Tuesday the 16th to meet and confer telephonically pursuant to the Court's order of 4/9; review Sartell correspondence to team forwarding draft Plaintiff's initial disclosures;	0.4	1075	\$430.00
Chapman, Cynthia	04/11/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding meet and confer telephonically pursuant to the Court's order of 4/9; review Sartell correspondence to team forwarding draft Plaintiff's initial disclosures;	0.3	850	\$255.00
Kersh, Kathy	04/11/19	Depositions	Review CBC website; review screenshots previously downloaded; print screenshots for deposition; re-size screenshots for printing	1.0	325	\$325.00
Caddell, Michael	04/12/19	Written Discovery	Review Tabor correspondence to and from Sartell and team regarding adding Norm Reeves Honda as persons who have knowledge of relevant facts to draft plaintiff's initial disclosures;	0.2	1075	\$215.00
Chapman, Cynthia	04/12/19	Written Discovery	Review Tabor correspondence to and from Sartell and team regarding adding Norm Reeves Honda as persons who have knowledge of relevant facts to draft plaintiff's initial disclosures;	0.1	850	\$85.00
Kersh, Kathy	04/12/19	Depositions	Review CBC website and screenshots; capture additional screenshots; begin printing screenshots; collect additional documents for deposition file	3.0	325	\$975.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/15/19	Written Discovery	Prepare correspondence to and from Sartell and team regarding Meet & Confer re Discovery Dispute and response from Tamborelli; review Sartell correspondence to counsel and team regarding meet and confer regarding discovery dispute dial-in information; respond; review Sartell correspondence to and from team regarding serving Plaintiff's Initial Disclosures and forwarding document on same; review Kersh correspondence to and from team forwarding screenshots of the Credit Bureau Connection website for potential deposition exhibits; respond; review Kabacinski correspondence to Tamborelli, and team forwarding Plaintiff's Initial Disclosures;	0.9	1075	\$967.50
Chapman, Cynthia	04/15/19	Written Discovery	Review Caddell correspondence to and from Sartell and team regarding discovery meet and confer and response from Tamborelli; review Sartell correspondence to counsel and team regarding meet and confer regarding discovery dispute; review Caddell response; review Sartell correspondence to and from team regarding serving Plaintiff's Initial Disclosures and forwarding document on same; review Kersh correspondence to and from team forwarding screenshots of the Credit Bureau Connection website for potential deposition exhibits; review Caddell response; review Kabacinski correspondence to Tamborelli, and team forwarding Plaintiff's Initial Disclosures;	0.5	850	\$425.00
Tabor, Amy	04/15/19	Motion Practice	Correspond via email with co-counsel and opposing counsel regarding scheduling meet and confer.	0.1	750	\$75.00
Kersh, Kathy	04/15/19	Depositions	Review screenshots from CBC website; print closeups; edit screenshots with Snagit; print copies for deposition; emails to Caddell and Tabor regarding same	3.5	325	\$1,137.50
Kersh, Kathy	04/15/19	Pleadings and Service	Review email from cocounsel; Save discovery responses to network; organize folders on network	0.2	325	\$65.00
Caddell, Michael	04/16/19	Depositions	Review Tamborelli correspondence to and from Sartell and team regarding the CBC production in response to the request for production set 1 and forwarding documents on same; review Sartell correspondence to and from team regarding same; review Tabor correspondence regarding telephone conference with Tamborelli regarding agreeing to produce invoice attached to this production and regarding Norm Reeves' Honda's deposition; respond; review Kersh correspondence regarding sending four copies of each production via FedEx;	0.6	1075	\$645.00
Chapman, Cynthia	04/16/19	Depositions	Review Tamborelli correspondence to and from Sartell and team regarding the CBC production in response to the request for production set 1 and forwarding documents on same; review Sartell correspondence to and from team regarding same; review Tabor correspondence regarding telephone conference with Tamborelli regarding agreeing to produce invoice attached to production and regarding Norm Reeves' Honda's deposition; review Caddell response; review Kersh correspondence regarding production;	0.4	850	\$340.00
Tabor, Amy	04/16/19	Depositions	Meet and confer with opposing counsel regarding motion to compel; review production; correspond via email with Michael Caddell regarding third party depositions.	1.5	750	\$1,125.00
Kersh, Kathy	04/16/19	Depositions	Review CBC website; print additional copies of documents for deposition; prepare exhibit folders; prepare fed ex to Caddell	4.0	325	\$1,300.00
Caddell, Michael	04/17/19	Settlement Talks and Conferences	Review Tamborelli correspondence to and from Sartell and team regarding Plaintiff Sung Gon Kang and regarding matter must be dismissed immediately; prepare for deposition; review multiple Kersh correspondence regarding printing deposition exhibits in letter size; respond; review Tabor correspondence regarding telephone conference with Eric Ferentz, the general sales manager at Norm Reeves Honda and regarding leaving message for Kirk Gominsky; respond; conf w/ Chapman;	1.4	1075	\$1,505.00
Chapman, Cynthia	04/17/19	Depositions	Review Tamborelli correspondence to and from Sartell and team regarding desired dismissal; review multiple Kersh correspondence regarding deposition exhibits; review Caddell response; review Tabor correspondence regarding telephone conference with Eric Ferentz, the general sales manager at Norm Reeves Honda and regarding leaving message for Kirk Gominsky; review Caddell response; conf w/ Caddell;	1.0	850	\$850.00
Tabor, Amy	04/17/19	Depositions	Review correspondence with opposing counsel regarding discovery dispute; teleconference with Norm Reeves Honda regarding deposition scheduling.	0.2	750	\$150.00
Kersh, Kathy	04/17/19	Depositions	Review email from Labbe; reprint legal size exhibits in letter size; prepare letter size exhibit folders; prepare fed ex box to Caddell	1.0	325	\$325.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/18/19	Depositions	Prepare correspondence to Kersh regarding sending four new copies of deposition exhibits in letter size; review Tamborelli correspondence to and from clerk, counsel and team forwarding informal discovery dispute conference letter brief; prepare correspondence to and from Tabor, Sartell regarding filing plaintiff's letter brief; review Tabor correspondence to and from Sartell regarding plaintiff's letter brief with suggested changes and forwarding document on same; review Tabor correspondence to Magistrate Judge Oberto, counsel and team forwarding Plaintiff's letter brief regarding parties' discovery dispute; respond;	0.9	1075	\$967.50
Chapman, Cynthia	04/18/19	Depositions	Review Caddell correspondence to Kersh regarding deposition exhibits; review Tamborelli correspondence to and from clerk, counsel and team forwarding informal discovery dispute conference letter brief; review Caddell correspondence to and from Tabor, Sartell regarding filing plaintiff's letter brief; review Tabor correspondence to and from Sartell regarding plaintiff's letter brief with suggested changes and forwarding document on same; review Tabor correspondence to Magistrate Judge Oberto, counsel and team forwarding Plaintiff's letter brief regarding parties' discovery dispute; review Caddell response;	1.0	850	\$850.00
Tabor, Amy	04/18/19	Motion Practice	Review CBC letter brief; file Plaintiff's letter brief.	1.5	750	\$1,125.00
Tabor, Amy	04/19/19	Depositions	Exchange voicemails with Norm Reeves Honda and their outside counsel regarding depositions scheduling.	0.2	750	\$150.00
Tabor, Amy	04/22/19	Depositions	Review documents; outline questions for Larsen deposition.	4.5	750	\$3,375.00
Kersh, Kathy	04/22/19	Depositions	Review email from Tabor; capture two screens on CBC website; begin to print color copies for deposition; respond to email	0.3	325	\$97.50
Caddell, Michael	04/23/19	Depositions	Review Kersh correspondence forwarding two additional CBC website screenshots that deal with red flags and OFAC searches; review Kersh correspondence forwarding three additional documents that Tabor identified as potential deposition exhibits;	0.4	1075	\$430.00
Chapman, Cynthia	04/23/19	Depositions	Review Kersh correspondence forwarding two additional CBC website screenshots that deal with red flags and OFAC searches; review Kersh correspondence forwarding three additional documents that Tabor identified as potential deposition exhibits;	0.2	850	\$170.00
Tabor, Amy	04/23/19	Depositions	Review exhibits; draft outline for Larsen deposition.	3.5	750	\$2,625.00
Kersh, Kathy	04/23/19	Depositions	Review documents for deposition; print color copies and file folder labels; review emails from Tabor; download documents to network; prepare Fed Ex envelopes to Caddell; trip to Fed Ex office to send envelope	2.0	325	\$650.00
Caddell, Michael	04/24/19	Depositions	Review Tabor correspondence to team forwarding draft outline for Darin Larsen with several exhibits; prepare for deposition;	1.8	1075	\$1,935.00
Chapman, Cynthia	04/24/19	Depositions	Review Tabor correspondence to team forwarding draft outline for Darin Larsen with several exhibits;	0.1	850	\$85.00
Tabor, Amy	04/24/19	Depositions	Prepare deposition outline and exhibits.	5.0	750	\$3,750.00
Caddell, Michael	04/25/19	Written Discovery	Review Sartell correspondence to and from team regarding upcoming conference; respond; t/conf w/ Court, et al.; prepare multiple correspondence to and from Kersh, Tabor regarding FedExing four color copies of Norm Reeves Honda Huntington Beach report; review Tabor correspondence regarding comments on draft proposed order and forwarding same; respond; review Tabor correspondence to and from Tamborelli and team regarding proposed order and forwarding same; respond; review Tabor correspondence to Magistrate Judge Oberto, counsel and team forwarding proposed order compelling discovery as discussed at today's informal discovery conference;	1.6	1075	\$1,720.00
Chapman, Cynthia	04/25/19	Written Discovery	Review Sartell correspondence to and from team regarding upcoming conference; review Caddell response; review multiple Caddell correspondence to and from Kersh, Tabor regarding Norm Reeves Honda report; review Tabor correspondence regarding comments on draft proposed order and forwarding same; review Caddell response; review Tabor correspondence to and from Tamborelli and team regarding proposed order and forwarding same; review Caddell response; review Tabor correspondence to Magistrate Judge Oberto, counsel and team forwarding proposed order compelling discovery;	0.8	850	\$680.00
Tabor, Amy	04/25/19	Motion Practice	Prepare for and attend informal discovery conference; draft proposed order.	2.5	750	\$1,875.00
Kersh, Kathy	04/25/19	Depositions	Review Caddell email; print documents for deposition; prepare Fed Ex; reply to email; trip to Fed Ex to send documents to Caddell	0.5	325	\$162.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/26/19	Depositions	Review Sartell correspondence to and from team regarding Thursday depositions; respond; review Tamborelli correspondence to and from counsel and team regarding Proposed Order re Discovery Dispute; respond; review Minutes (Text Only) for proceedings before Magistrate Judge Sheila K. Oberto: Telephonic Discovery Dispute Hearing held on 4/25/2019. Written Order to follow. Plaintiffs Counsel Michael Caddell & Amy Tabor present. Defendants Counsel John Tamborelli present; review Order Compelling Discovery, signed by Magistrate Judge Sheila K. Oberto on 4/25/2019;	0.7	1075	\$752.50
Chapman, Cynthia	04/26/19	Depositions	Review Sartell correspondence to and from team regarding Thursday depositions; review Caddell response; review Tamborelli correspondence to and from counsel and team regarding Proposed Order re Discovery Dispute; review Caddell response; review Minutes for proceedings (discovery dispute) before Magistrate Judge Sheila K. Oberto; review Order Compelling Discovery, signed by Magistrate Judge Sheila K. Oberto on 4/25/2019;	0.5	850	\$425.00
Tabor, Amy	04/26/19	Depositions	Review email correspondence regarding deposition preparation and exhibits; review order compelling discovery.	0.3	750	\$225.00
Kersh, Kathy	04/26/19	Depositions	Review Tabor email and respond regarding Larsen depo start time	0.1	325	\$32.50
Caddell, Michael	04/29/19	Depositions	Review Kersh correspondence to and from team regarding if Larsen deposition still going forwarded and forwarding Larsen deposition notice; respond; review Kersh correspondence to Stratos Legal regarding same; review Tamborelli correspondence to and from Tabor, court clerk and team regarding mistake on Proposed Order; prepare correspondence to Tabor regarding responding to Tamborelli; review Tamborelli correspondence forwarding agreed upon and ordered second production; review multiple Sartell correspondence to and from team regarding Tamborelli; respond; prepare correspondence to and from Tabor and team regarding calling court regarding a model protective/confidentiality order; review Tabor correspondence regarding the Fee Schedule and forwarding document on same; respond; review Tabor correspondence to and from Tamborelli, court clerk, counsel and team regarding our letter brief and forwarding the proposed order; review multiple Tabor correspondence to and from team regarding comments on the draft protective order and forwarding document on same; respond; review Tabor correspondence forwarding updated deposition outline incorporating questions on the documents that were produced today; prepare multiple responses; review Tabor correspondence to court clerk, and team regarding the parties have agreed that the order compelling discovery, dkt 26 and forwarding document on same; review Tabor correspondence to Tamborelli forwarding draft protective order; prepare for Larsen deposition and travel to Fresno; confs w/ Chapman;	8.5	1075	\$9,137.50
Chapman, Cynthia	04/29/19	Depositions	Review Kersh correspondence to and from team regarding Larsen deposition; review Caddell response; review Kersh correspondence to Stratos Legal regarding same; review Tamborelli correspondence to and from Tabor, court clerk and team regarding Proposed Order; review Caddell correspondence to Tabor regarding responding to Tamborelli; review Tamborelli correspondence forwarding agreed upon and ordered second production; review multiple Sartell correspondence to and from team regarding Tamborelli; review Caddell response; review Caddell correspondence to and from Tabor and team regarding calling court regarding protective/confidentiality order; review Tabor correspondence regarding the Fee Schedule and forwarding document on same; review Caddell response; review Tabor correspondence to and from Tamborelli, court clerk, counsel and team regarding letter brief and forwarding the proposed order; review multiple Tabor correspondence to and from team regarding comments on the draft protective order and forwarding document on same; review Caddell response; review Tabor correspondence forwarding updated deposition outline incorporating questions on the documents that were produced today; review multiple Caddell responses; review Tabor correspondence to court clerk, and team regarding the parties have agreed that the order compelling discovery, dkt 26 and forwarding document on same; review Tabor correspondence to Tamborelli forwarding draft protective order; confs with Caddell;	2.6	850	\$2,210.00
Tabor, Amy	04/29/19	Depositions	Review documents produced; revise deposition outline; correspond via email with opposing counsel and Court regarding corrected order compelling production; draft protective order; correspond via email with co-counsel regarding revisions to draft protective order.	7.5	750	\$5,625.00
Kersh, Kathy	04/29/19	Pleadings and Service	Download new document production; review Tabor email	0.1	325	\$32.50
Kersh, Kathy	04/29/19	Depositions	Review email from Caddell and Stratos; reply to Stratos email about depo starting at 9 Am; reply to Caddell email	0.2	325	\$65.00
Labbe, Felicia	04/29/19	Pleadings and Service	Correspondence to and from Tabor regarding dupe and revise Proposed Stipulated Protective Order; dupe, revise and format same and send to Tabor;	2.0	175	\$350.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/30/19	Depositions	Prepare for and depose Larsen; return to Carmel; t/confs with Tabor; review Tabor correspondence forwarding two searches on the Treasury Department's website and on CBC's website; review Amended Order Compelling Discovery, Signed by Magistrate Judge Sheila K. Oberto on 4/30/2019; confs w/ Chapman;	9.5	1075	\$10,212.50
Chapman, Cynthia	04/30/19	Written Discovery	Review Tabor correspondence forwarding two searches on the Treasury Department's website and on CBC's website; review Amended Order Compelling Discovery, Signed by Magistrate Judge Sheila K. Oberto on 4/30/2019; confs with Caddell;	1.0	850	\$850.00
Tabor, Amy	05/01/19	Depositions	Teleconference with Michael Caddell and Cynthia Chapman regarding Larsen deposition and discovery plan going forward.	0.5	750	\$375.00
Caddell, Michael	05/02/19	Depositions	Review Sartell correspondence to and from team regarding Tuesday's deposition; review multiple Tabor correspondence to and from Sartell and team regarding scheduling telephone conference; respond;	0.5	1075	\$537.50
Chapman, Cynthia	05/02/19	Depositions	Review Sartell correspondence to and from team regarding Tuesday's deposition; review multiple Tabor correspondence to and from Sartell and team regarding scheduling telephone conference; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	05/03/19	Pleadings and Service	Review multiple Francis to and from team regarding scheduling telephone conference;	0.3	1075	\$322.50
Chapman, Cynthia	05/03/19	Pleadings and Service	Review multiple Francis correspondence to and from team regarding scheduling telephone conference;	0.1	850	\$85.00
Caddell, Michael	05/06/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, counsel and team advise if Defendant consent to a brief extension of Plaintiff's responses to Wednesday, May 15; respond;	0.2	1075	\$215.00
Chapman, Cynthia	05/06/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, counsel and team regarding extension of Plaintiff's responses to Wednesday, May 15; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	05/07/19	Pleadings and Service	Review Tabor correspondence to Sartell regarding scheduling telephone conference; respond;	0.2	1075	\$215.00
Chapman, Cynthia	05/07/19	Pleadings and Service	Review Tabor correspondence to Sartell regarding scheduling telephone conference; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	05/08/19	Pleadings and Service	Review Sartell correspondence to team forwarding conference call information;	0.1	1075	\$107.50
Chapman, Cynthia	05/08/19	Pleadings and Service	Review Sartell correspondence to team forwarding conference call information;	0.1	850	\$85.00
Caddell, Michael	05/09/19	Depositions	T/conf w/ Tabor, Sartell regarding Larsen deposition, discovery, etc.; review multiple Sartell correspondence to and from team regarding discovery strategy update; review Sartell correspondence to team forwarding revised version of the subscriber agreement;	1.2	1075	\$1,290.00
Chapman, Cynthia	05/09/19	Written Discovery	Review multiple Sartell correspondence to and from team regarding discovery strategy update; review Sartell correspondence to team forwarding revised version of the subscriber agreement;	0.2	850	\$170.00
Tabor, Amy	05/09/19	Depositions	Teleconference with Jordan Sartell regarding depositions and next steps; review email correspondence among co-counsel regarding next steps.	1.5	750	\$1,125.00
Caddell, Michael	05/14/19	Written Discovery	Review Sartell correspondence to and from team regarding draft Plaintiff's Objections and Responses to Defendant's Interrogatories and forwarding documents on same; respond;	0.5	1075	\$537.50
Chapman, Cynthia	05/14/19	Written Discovery	Review Sartell correspondence to and from team regarding draft Plaintiff's Objections and Responses to Defendant's Interrogatories and forwarding documents on same; review Caddell response;	0.4	850	\$340.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	05/15/19	Written Discovery	Review Kersh correspondence regarding Larsen deposition transcript; respond; review Kersh correspondence to team regarding telephone conference with Stratos regarding Larsen transcript; review Sartell correspondence to and from team forwarding draft Plaintiff's Objections and Responses to Defendant's Discovery for review; review Sartell correspondence to and from Tamborelli, counsel and team forwarding attached Plaintiff's Objections and Responses to Defendant's First Interrogatories, Plaintiff's Objections and Responses to Defendant's First Requests for the Production of Documents, Plaintiff's Objections and Responses to Defendant's First Requests for Admission, and a Certificate of Service regarding same; review Tabor correspondence to and from team regarding discovery strategy update, initial scheduling conference and regarding scheduling telephone conference; review Tamborelli correspondence to and from Sartell, and team regarding providing documents to Plaintiff's objections and Responses to Defendant's Written Discovery; review Tabor correspondence forwarding correspondence with McLoon;	1.4	1075	\$1,505.00
Chapman, Cynthia	05/15/19	Written Discovery	Review Kersh correspondence regarding Larsen deposition transcript; review Caddell response; review Kersh correspondence to team regarding telephone conference with Stratos regarding Larsen transcript; review Sartell correspondence to and from team forwarding draft Plaintiff's Objections and Responses to Defendant's Discovery for review; review Sartell correspondence to and from Tamborelli, counsel and team forwarding attached Plaintiff's Objections and Responses to Defendant's First Interrogatories, Plaintiff's Objections and Responses to Defendant's First Requests for the Production of Documents, Plaintiff's Objections and Responses to Defendant's First Requests for Admission, and a Certificate of Service regarding same; review Tabor correspondence to and from team regarding discovery strategy update, initial scheduling conference and regarding scheduling telephone conference; review Tamborelli correspondence to and from Sartell, and team regarding providing documents to Plaintiff's objections and Responses to Defendant's Written Discovery; review Tabor correspondence forwarding correspondence with McLoon;	0.9	850	\$765.00
Tabor, Amy	05/15/19	Motion Practice	Conference with Michael Caddell and Cynthia Chapman regarding tasks and status; prepare email to team regarding tasks and status.	0.7	750	\$525.00
Kersh, Kathy	05/15/19	Depositions	Review Stratos site; emails to attorneys about deposition of Larsen; call Stratos about status of deposition transcript; review folder of documents online; create Kang case in Lexbe; create custodians, witnesses and issues; create custom fields; review and respond to Tabor and Sartell emails	1.0	325	\$325.00
Caddell, Michael	05/16/19	Pleadings and Service	Review Tabor correspondence to and from Sartell forwarding Caddell's correspondence with McLoon;	0.3	1075	\$322.50
Chapman, Cynthia	05/16/19	Pleadings and Service	Review Tabor correspondence to and from Sartell forwarding Caddell's correspondence with McLoon;	0.1	850	\$85.00
Tabor, Amy	05/16/19	Depositions	Prepare email to opposing counsel regarding Frank Larsen deposition; correspond via email with George Coombis regarding Norm Reeves deposition.	0.2	750	\$150.00
Caddell, Michael	05/17/19	Motion Practice	Review Francis correspondence to and from Tabor and team regarding covering hearing on June 3; review Francis correspondence to and from team regarding producing Experian-related materials and Caddell email correspondence with Dan McLoon;	0.3	1075	\$322.50
Chapman, Cynthia	05/17/19	Motion Practice	Review Francis correspondence to and from Tabor and team regarding covering hearing on June 3; review Francis correspondence to and from team regarding producing Experian-related materials and Caddell email correspondence with Dan McLoon;	0.1	850	\$85.00
Caddell, Michael	05/19/19	Pleadings and Service	Review Tamborelli correspondence to Sartell and counsel regarding second request to dismiss;	0.2	1075	\$215.00
Chapman, Cynthia	05/19/19	Pleadings and Service	Review Tamborelli correspondence to Sartell and counsel regarding second request to dismiss;	0.1	850	\$85.00
Caddell, Michael	05/20/19	Written Discovery	Review Sartell correspondence to and from team regarding Tamborelli correspondence regarding second request to dismiss; review Sartell correspondence to and from Tamborelli and team regarding awaiting a final document from Plaintiff and expect to produce Plaintiff's documents tomorrow and regarding provide an update on Defendant's initial disclosures;	0.3	1075	\$322.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	05/20/19	Written Discovery	Review Sartell correspondence to and from team regarding Tamborelli correspondence regarding second request to dismiss; review Sartell correspondence to and from Tamborelli and team regarding Plaintiff's document production and regarding provide Defendant's initial disclosures;	0.2	850	\$170.00
Kersh, Kathy	05/20/19	Depositions	Review Dropbox folder file; email to co-counsel; review response; reply; contact Stratos about deposition transcript status	0.3	325	\$97.50
Caddell, Michael	05/21/19	Depositions	Review Kersh correspondence regarding still working to find out what the status of Larsen deposition transcript is;	0.1	1075	\$107.50
Chapman, Cynthia	05/21/19	Depositions	Review Kersh correspondence regarding status of Larsen deposition transcript;	0.1	850	\$85.00
Kersh, Kathy	05/21/19	Written Discovery	Upload Kang documents; create Francis & Mailman users in case and send login emails to same; review and code documents; redact personal identifiers; emails to Tabor and Sartell regarding redactions and documents	2.5	325	\$812.50
Caddell, Michael	05/22/19	Depositions	Review Stratos correspondence regarding Larsen deposition transcript and exhibits; review Kersh correspondence regarding same; respond; review Kersh correspondence to and from Francis, Soumilas, Sartell and team regarding link to access the Larsen transcript and exhibits; respond; review Tamborelli correspondence to and from Sartell, counsel and team forwarding CBC initial disclosure and regarding status of Plaintiffs producing documents; review Francis correspondence to and from Tamborelli, counsel and team regarding Plaintiffs have no relevant insurance agreements;	1.0	1075	\$1,075.00
Chapman, Cynthia	05/22/19	Depositions	Review Stratos correspondence regarding Larsen deposition transcript and exhibits; review Kersh correspondence regarding same; review Caddell response; review Kersh correspondence to and from Francis, Soumilas, Sartell and team regarding link to access the Larsen transcript and exhibits; review Caddell response; review Tamborelli correspondence to and from Sartell, counsel and team forwarding CBC initial disclosure and regarding status of Plaintiff producing documents; review Francis correspondence to and from Tamborelli, counsel and team regarding insurance agreements;	0.7	850	\$595.00
Kersh, Kathy	05/22/19	Depositions	Review documents for production; redact more documents; telephone calls with Sartell; run production; download production; delete load files from production folders; prepare folder for production; email folder to Sartell; emails to Tabor regarding production; review Lexbe manual; telephone call with Stratos; download Larsen depo and exhibits; send email to attorneys regarding deposition; email transcript to Labbe	4.3	325	\$1,397.50
Labbe, Felicia	05/22/19	Depositions	Conference with Tabor regarding highlighting Larsen deposition transcript; highlight transcript and send to Tabor;	0.5	175	\$87.50
Caddell, Michael	05/27/19	Written Discovery	Prepare correspondence to and from Tamborelli, Francis, counsel and team regarding the fact that client did tender the defense to the insurance carrier is some indication that there was at least some potential for coverage; prepare correspondence to and from Sartell and team regarding second request to dismiss; prepare correspondence to and from Tabor regarding producing email correspondence with Dan McLoon; prepare multiple correspondence to and from Francis and team regarding same; prepare correspondence to and from Tabor regarding telephone conference with entire group;	0.6	1075	\$645.00
Chapman, Cynthia	05/27/19	Written Discovery	Review Caddell correspondence to and from Tamborelli, Francis, counsel and team regarding insurance and coverage; review Caddell correspondence to and from Sartell and team regarding second request to dismiss; review Caddell correspondence to and from Tabor regarding producing email correspondence with Dan McLoon; review multiple Caddell correspondence to and from Francis and team regarding same; review Caddell correspondence to and from Tabor regarding telephone conference with entire group;	0.3	850	\$255.00
Caddell, Michael	05/28/19	Written Discovery	Review Tabor correspondence regarding we have asked for dates for Frank Larsen and Norm Reeves Honda, and Jim is available to handle the scheduling conference and regarding not hearing back yet from either Tamborelli or Norm Reeves about deposition dates; review Sartell correspondence to and from team regarding insurance issue and forwarding draft Plaintiff's second requests for production of documents with Exhibit A; respond;	0.5	1075	\$537.50
Chapman, Cynthia	05/28/19	Written Discovery	Review Tabor correspondence regarding discovery and hearing issues; review Sartell correspondence to and from team regarding insurance issue and forwarding draft Plaintiff's second requests for production of documents; review Caddell response;	0.5	850	\$425.00
Caddell, Michael	05/29/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, counsel and team forwarding Plaintiff's Second Requests for Production of Documents and Certificate of Service;	0.2	1075	\$215.00
Chapman, Cynthia	05/29/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, counsel and team forwarding Plaintiff's Second Requests for Production of Documents;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	05/31/19	Written Discovery	Review Tamborelli correspondence to Sartell, counsel and team regarding Plaintiff's Production of Documents;	0.1	1075	\$107.50
Chapman, Cynthia	05/31/19	Written Discovery	Review Tamborelli correspondence to Sartell, counsel and team regarding Plaintiff's Production of Documents;	0.1	850	\$85.00
Caddell, Michael	06/04/19	Pleadings and Service	Review Francis correspondence to and from team regarding attending the status conference in Fresno next week; review Sartell correspondence to and from team forwarding draft revised status report to be filed on Thursday; review Sartell correspondence to Tamborelli, counsel and team forwarding revised joint scheduling proposal; review Francis correspondence to team regarding appearing telephonically; conf w/ Chapman;	0.5	1075	\$537.50
Chapman, Cynthia	06/04/19	Pleadings and Service	Review Francis correspondence to and from team regarding attending the status conference in Fresno; review Sartell correspondence to and from team forwarding draft revised status report to be filed on Thursday; review Sartell correspondence to Tamborelli, counsel and team forwarding revised joint scheduling proposal; review Francis correspondence to team regarding appearing telephonically; conf with Caddell;	0.5	850	\$425.00
Tabor, Amy	06/04/19	Motion Practice	Correspond via email with co-counsel regarding joint status report and conference.	0.1	750	\$75.00
Caddell, Michael	06/05/19	Pleadings and Service	Review Sartell correspondence to and from team conferences, scheduling proposal; review Kabascinski correspondence regarding same and forwarding Order Setting Scheduling Conference;	0.3	1075	\$322.50
Chapman, Cynthia	06/05/19	Pleadings and Service	Review Sartell correspondence to and from team conferences, scheduling proposal; review Kabascinski correspondence regarding same and forwarding Order Setting Scheduling Conference;	0.5	850	\$425.00
Tabor, Amy	06/05/19	Motion Practice	Correspond via email with co-counsel regarding attendance at scheduling conference.	0.2	750	\$150.00
Caddell, Michael	06/06/19	Written Discovery	Review Sartell correspondence to and from Kabacinski and team; review Tamborelli correspondence to and from Sartell, and team forwarding revised redline of the status statement; review multiple Sartell correspondence to and from team regarding Tamborelli changes to status statement and forwarding same; review Kabacinski correspondence to and from team regarding conference; respond; review Sartell correspondence to and from Tamborelli and team regarding revisions to paragraph 9(a) regarding Defendant's newfound desire to file an early dispositive motion contradicts the parties' previous agreement to conduct discovery according to a bifurcated schedule and forwarding same; respond; review Chapman correspondence to and from Francis and team regarding telephone appearance; respond; review Tamborelli correspondence to and from Sartell and team regarding clean and redline with a footnote in the issue of the motion for summary judgment/adjudication and forwarding document on same; prepare multiple responses; review Sartell correspondence to Tamborelli and team forwarding final version for filing; review Joint Scheduling Report by Sung Gon Kang; conf w/ Chapman;	1.2	1075	\$1,290.00
Chapman, Cynthia	06/06/19	Written Discovery	Review Sartell correspondence to and from Kabacinski and team; review Tamborelli correspondence to and from Sartell, and team forwarding revised redline of the status statement; review multiple Sartell correspondence to and from team regarding Tamborelli changes to status statement and forwarding same; review Kabacinski correspondence to and from team regarding conference; review Caddell response; review Sartell correspondence to and from Tamborelli and team regarding revisions to status statement and Defendant's newfound desire to file an early dispositive motion; review Caddell response; prepare correspondence to and from Francis and team regarding telephone appearance; review Caddell response; review Tamborelli correspondence to and from Sartell and team regarding clean and redline with a footnote in the issue of the motion for summary judgment/adjudication and forwarding document on same; review multiple Caddell responses; review Sartell correspondence to Tamborelli and team forwarding final version for filing; review Joint Scheduling Report; conf with Caddell;	1.1	850	\$935.00
Tabor, Amy	06/06/19	Motion Practice	Review and comment on draft joint scheduling report.	2.0	750	\$1,500.00
Kersh, Kathy	06/07/19	Pleadings and Service	Download file-stamped copy of scheduling report and review same; update calendar	0.3	325	\$97.50
Caddell, Michael	06/11/19	Pleadings and Service	Review Tamborelli correspondence to Sartell and team regarding appearing telephonically;	0.1	1075	\$107.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	06/11/19	Pleadings and Service	Review Tamborelli correspondence to Sartell and team regarding appearing telephonically;	0.1	850	\$85.00
Caddell, Michael	06/12/19	Pleadings and Service	Review Minute Order - Text Entry Only - The parties are encouraged to appear telephonically for the upcoming Scheduling Conference set on 6/13/2019 before Judge Oberto and may do so by dialing 888-557-8511 (access code 6208204), at the time of the hearing. You shall email Courtroom Deputy Wendy Kusamura, at WKusamura@caed.uscourts.gov, to advise the court who will be appearing telephonically. Minute Order signed by Magistrate Judge Sheila K. Oberto on 6/12/2019; review Sartell correspondence to and from Tamborelli and team regarding , counsel is to email Judge Oberto's courtroom deputy regarding telephonic appearances and regarding sending single email advising her that both Francis for Plaintiff and Tamborelli for Defendant will be appearing telephonically; review multiple Sartell correspondence to and from Kusamura, counsel and team regarding attorneys for both parties (Jim Francis and Amy Tabor for plaintiff and John Tamborelli for defendant) will appear telephonically;	0.2	1075	\$215.00
Chapman, Cynthia	06/12/19	Pleadings and Service	Review Minute Order regarding Scheduling Conference set on 6/13/2019; review Sartell correspondence to and from Tamborelli and team regarding scheduling conference logistics; review multiple Sartell correspondence to and from Kusamura, counsel and team regarding telephonic appearance;	0.1	850	\$85.00
Kersh, Kathy	06/12/19	Pleadings and Service	Telephone call with Labbe; search emails for Marriott invoice; email to Siddiqi at Marriott; forward invoice to Labbe	0.2	325	\$65.00
Caddell, Michael	06/13/19	Depositions	Prepare correspondence to and Labbe regarding Stratos Legal invoice; review Minutes (Text Only) for proceedings before Magistrate Judge Sheila K. Oberto: Telephonic Scheduling Conference held on 6/13/2019. Order to follow. Plaintiffs Counsel James Francis & Amy Tabor present. Defendants Counsel John Tamborelli present; review Scheduling Order: Class Certification Discovery ddl 10/4/2019; Motion for Class Certification filed by 11/1/2019; Motion Hearing set for 12/13/2019 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii; Telephonic Status Conference set for 2/25/2020 at 10:15 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto, signed by Magistrate Judge Sheila K. Oberto on 6/12/2019; conf w/ Chapman;	0.3	1075	\$322.50
Chapman, Cynthia	06/13/19	Depositions	Review Caddell correspondence to and from Labbe regarding Stratos Legal invoice; review Minutes regarding Telephonic Scheduling Conference held on 6/13/2019; conf w/ Caddell;	0.3	850	\$255.00
Caddell, Michael	06/14/19	Written Discovery	Review Scheduling Order: Class Certification Discovery ddl 10/4/2019; Motion for Class Certification filed by 11/1/2019; Motion Hearing set for 12/23/2019 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii; Telephonic Status Conference set for 2/25/2020 at 10:15 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto, signed by Magistrate Judge Sheila K. Oberto on 6/13/2019;	0.2	1075	\$215.00
Chapman, Cynthia	06/14/19	Pleadings and Service	Review Scheduling Order signed by Magistrate Judge Sheila K. Oberto on 6/13/2019;	0.2	850	\$170.00
Caddell, Michael	06/17/19	Depositions	Review Labbe correspondence regarding Stratos Legal invoice; respond;	0.1	1075	\$107.50
Chapman, Cynthia	06/17/19	Depositions	Review Labbe correspondence regarding Stratos Legal invoice; review Caddell response;	0.1	850	\$85.00
Kersh, Kathy	06/24/19	Pleadings and Service	Copy DVD to network; contact Veritext regarding audio problem; emails to Veritext regarding same; download new copy of deposition	2.0	325	\$650.00
Caddell, Michael	06/26/19	Depositions	Review Sartell correspondence to and from team regarding updated discovery and deposition roster and regarding deposition transcript of Larsen;	0.2	1075	\$215.00
Chapman, Cynthia	06/26/19	Depositions	Review Sartell correspondence to and from team regarding updated discovery and deposition transcript of Larsen;	0.1	850	\$85.00
Caddell, Michael	06/27/19	Depositions	Review Sartell correspondence to and from Tabor and team regarding updated discovery and deposition roster; review Sartell correspondence to and from Tabor and team regarding setting a meeting placeholder on the afternoon of 7/2? It looks like F&M folks are available after 11am PST/2pm EST, would 11/2 work; respond; review Sartell correspondence to and from team regarding discovery strategy conference and forwarding dial-in information; prepare multiple responses;	0.5	1075	\$537.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	06/27/19	Depositions	Review Sartell correspondence to and from Tabor and team regarding updated discovery; review Sartell correspondence to and from Tabor and team regarding setting team meeting; review Caddell response; review Sartell correspondence to and from team regarding discovery strategy conference; review multiple Caddell responses;	0.3	850	\$255.00
Caddell, Michael	07/01/19	Written Discovery	Review Tamborelli correspondence to and from Sartell, counsel and team regarding request that CBC be provide an extension of time to 7/10/2019 to respond to this discovery; review Tamborelli correspondence to and from Sartell, counsel and team forwarding the CBC response to Plaintiff second request for Documents;	0.4	1075	\$430.00
Chapman, Cynthia	07/01/19	Written Discovery	Review Tamborelli correspondence to and from Sartell, counsel and team regarding CBC request for an extension of time to respond to this discovery; review Tamborelli correspondence to and from Sartell, counsel and team forwarding CBC response to Plaintiff second request for Documents;	0.4	850	\$340.00
Caddell, Michael	07/02/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, counsel and team regarding Plaintiff's second set of document requests and regarding scheduling the deposition of Frank Larsen;	0.3	1075	\$322.50
Chapman, Cynthia	07/02/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, counsel and team regarding Plaintiff's second set of document requests and regarding scheduling the deposition of Frank Larsen;	0.3	850	\$255.00
Tabor, Amy	07/02/19	Written Discovery	Teleconference with Jordan Sartell regarding discovery strategy.	0.5	750	\$375.00
Caddell, Michael	07/04/19	Depositions	Prepare correspondence to and from Sartell, Tamborelli, counsel and team regarding deposition date for Frank Larsen;	0.3	1075	\$322.50
Chapman, Cynthia	07/04/19	Depositions	Review Caddell correspondence to and from Sartell, Tamborelli, counsel and team regarding deposition date for Larsen;	0.1	850	\$85.00
Caddell, Michael	07/09/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding and forwarding discovery correspondence regarding the salient deficiencies in CBC's discovery responses to date; prepare multiple correspondence to and from Sartell regarding issuing a deposition notice for Frank Larsen for one of the dates provided-- August 7, 9, 12, or 13; review Tamborelli correspondence to and from Sartell, Tamborelli and team regarding providing deposition date for plaintiff; respond; review multiple Sartell correspondence to and from Tamborelli and team forwarding Plaintiff's 30(b)(1) Notice of Deposition of Frank Larsen; prepare multiple responses;	0.8	1075	\$860.00
Chapman, Cynthia	07/09/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding salient deficiencies in CBC's discovery responses to date; review multiple Caddell correspondence to and from Sartell regarding issuing a deposition notice for Frank Larsen; review Tamborelli correspondence to and from Sartell, Tamborelli and team regarding providing deposition date for plaintiff; review Caddell response; review multiple Sartell correspondence to and from Tamborelli and team forwarding Plaintiff's 30(b)(1) Notice of Deposition of Frank Larsen; review multiple Caddell responses;	0.3	850	\$255.00
Caddell, Michael	07/15/19	Depositions	Review Sartell correspondence to and from team regarding dates for deposition of Mr. Kang; respond; prepare correspondence to Tamborelli and team regarding Mr. Kang's availability for deposition and regarding if Mr. Larsen can be available on the same day;	0.3	1075	\$322.50
Chapman, Cynthia	07/15/19	Depositions	Review Sartell correspondence to and from team regarding dates for deposition of Mr. Kang; respond; review Caddell correspondence to Tamborelli and team regarding Kang's availability for deposition and whether Mr. Larsen can be available same day;	0.2	850	\$170.00
Caddell, Michael	07/16/19	Depositions	Review Tamborelli correspondence to and from team regarding the availability of Larsen for deposition; respond;	0.2	1075	\$215.00
Chapman, Cynthia	07/16/19	Depositions	Review Tamborelli correspondence to and from team regarding the availability of Larsen for deposition; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	07/18/19	Depositions	Prepare correspondence to and from Sartell and team regarding Larsen deposition notice; review Sartell correspondence to and from Tamborelli and team regarding client's position with respect to the items raised in our discovery correspondence of July 9;	0.3	1075	\$322.50
Chapman, Cynthia	07/18/19	Depositions	Review Caddell correspondence to and from Sartell and team regarding Larsen deposition notice; review Sartell correspondence to and from Tamborelli and team regarding client's position with respect to discovery issues;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	07/22/19	Depositions	Review Sartell correspondence to and from Tamborelli and team forwarding Notice for the Deposition of Frank Larsen and regarding advising about the date and location so we may coordinate the deposition of Mr. Larsen and Mr. Kang; respond; prepare correspondence to and from Sartell and team regarding scheduling deadlines;	0.3	1075	\$322.50
Chapman, Cynthia	07/22/19	Depositions	Review Sartell correspondence to and from Tamborelli and team forwarding Notice for the Deposition of Frank Larsen and coordinating the deposition of Larsen and Kang; review Caddell response; review Caddell correspondence to and from Sartell and team regarding scheduling deadlines;	0.2	850	\$170.00
Caddell, Michael	07/23/19	Depositions	Review Sartell correspondence to and from team regarding Plaintiff's availability for deposition narrowing to Thursday, 8/22 only; respond; review Tamborelli correspondence to and from team regarding Frank Laren is available for depo in Fresno Tues/Wed/Thur week of 8/26 or Tues/Wed/Thur week of 9/9; prepare correspondence to and from Sartell, Tamborelli and team regarding issuing an amended deposition notice for Tuesday, August 27, for Mr. Larsen, in Fresno at the Marriott Courtyard; review Kersh correspondence to and from Sartell and team regarding Larsen deposition regarding sending deposition notice to send to court reporter and regarding reserving room or conference room for same; respond; review Kersh correspondence to and from Sartell and team regarding realtime reporter with livenotes for Larsen deposition; respond; review Sartell correspondence to and from Tamborelli and team forwarding second revised notice for 8/27 for Larsen; review Sartell correspondence to and from Tamborelli and team regarding Mr. Kang is available on August 22, not August 21;	0.9	1075	\$967.50
Chapman, Cynthia	07/23/19	Depositions	Review Sartell correspondence to and from team regarding Plaintiff's availability for deposition; review Caddell response; review Tamborelli correspondence to and from team regarding Frank Larsen deposition availability; review Caddell correspondence to and from Sartell, Tamborelli and team regarding issuing an amended deposition notice for Larsen; review Kersh correspondence to and from Sartell and team regarding Larsen deposition; review Kersh correspondence to and from Sartell and team regarding realtime reporter with livenotes for Larsen deposition; review Sartell correspondence to and from Tamborelli and team forwarding second revised notice for Larsen deposition; review Sartell correspondence to and from Tamborelli and team regarding Mr. Kang's availability for deposition;	0.8	850	\$680.00
Kersh, Kathy	07/23/19	Depositions	Review email from Caddell; prepare email to Veritext/Stratos for reporter; reply to Caddell email; send email to Marriott catering manager regarding room rental	0.3	325	\$97.50
Kersh, Kathy	07/24/19	Depositions	Review email from Marriott regarding room rental; respond to email	0.2	325	\$65.00
Caddell, Michael	07/25/19	Depositions	Review Kersh correspondence to team regarding F294reporter and videographer for the Frank Larsen deposition and regarding still working on renting room at the Marriott;	0.1	1075	\$107.50
Chapman, Cynthia	07/25/19	Depositions	Review Kersh correspondence logistics for Larsen deposition;	0.1	850	\$85.00
Caddell, Michael	07/29/19	Depositions	Review Kersh correspondence regarding Marriott contract for the deposition rental;	0.1	1075	\$107.50
Chapman, Cynthia	07/29/19	Depositions	Review Kersh correspondence regarding Marriott contract for the deposition;	0.1	850	\$85.00
Kersh, Kathy	07/29/19	Depositions	Review materials from Marriott; sign agreement; review credit card link; email to Caddell regarding Marriott number	0.5	325	\$162.50
Caddell, Michael	07/30/19	Depositions	Review Labbe correspondence forwarding invoice from Veritext; review multiple Sartell correspondence to and from Tamborelli regarding scheduling meet and confer;	0.3	1075	\$322.50
Chapman, Cynthia	07/30/19	Depositions	Review Labbe correspondence forwarding invoice from Veritext; review multiple Sartell correspondence to and from Tamborelli regarding scheduling meet and confer;	0.2	850	\$170.00
Caddell, Michael	07/31/19	Pleadings and Service	Review multiple Tamborelli correspondence to and from Sartell, Tabor regarding status of meet and confer; prepare multiple responses;	0.3	1075	\$322.50
Tabor, Amy	07/31/19	Motion Practice	Correspond via email with co-counsel and opposing counsel regarding scheduling telephone conference.	0.1	750	\$75.00
Caddell, Michael	08/01/19	Pleadings and Service	Review Sartell correspondence to Tamborelli et al counsel and team forwarding meet and confer conference information;	0.1	1075	\$107.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	08/01/19	Pleadings and Service	Review Sartell correspondence to Tamborelli et al counsel and team forwarding meet and confer conference information;	0.1	850	\$85.00
Caddell, Michael	08/02/19	Written Discovery	Review Tamborelli correspondence forwarding CBC response to 7/9/19 Meet and Confer; review multiple Sartell correspondence to and from Tabor and team regarding regarding scheduling telephone conference prior to meet and confer; review Tamborelli correspondence to and from Sartell, Tabor and team forwarding Defendant Credit Bureau Connection Inc.'s Rule 30 Notice of Taking Deposition of Sung Gon Kang; review Sartell correspondence to and from team regarding telephone conference with Tamborelli regarding meet and confer aftermath; review Sartell correspondence to and from Kusamura, Tamborelli and team regarding Informal Discovery Conference Request;	0.8	1075	\$860.00
Chapman, Cynthia	08/02/19	Written Discovery	Review Tamborelli correspondence forwarding CBC response to 7/9/19 Meet and Confer; review multiple Sartell correspondence to and from Tabor and team regarding regarding scheduling telephone conference prior to meet and confer; review Tamborelli correspondence to and from Sartell, Tabor and team forwarding CBC's Rule 30 Notice of Deposition of Sung Gon Kang; review Sartell correspondence to and from team regarding telephone conference with Tamborelli regarding meet and confer; review Sartell correspondence to and from Kusamura, Tamborelli and team regarding Informal Discovery Conference Request;	0.6	850	\$510.00
Caddell, Michael	08/04/19	Depositions	Prepare correspondence to and from Tamborelli, Kusamura, and team regarding need to work deposition dates; prepare correspondence to Labbe and team regarding Veritext invoice;	0.2	1075	\$215.00
Chapman, Cynthia	08/04/19	Depositions	Review Caddell correspondence to and from Tamborelli, Kusamura, and team regarding deposition dates; review Caddell correspondence to Labbe and team regarding Veritext invoice;	0.1	850	\$85.00
Caddell, Michael	08/05/19	Written Discovery	Review Labbe correspondence regarding invoice from Veritext; review Sartell correspondence to Tamborelli and team regarding informal discovery conference request;	0.2	1075	\$215.00
Chapman, Cynthia	08/05/19	Written Discovery	Review Labbe correspondence regarding invoice from Veritext; review Sartell correspondence to Tamborelli and team regarding informal discovery conference request;	0.2	850	\$170.00
Caddell, Michael	08/08/19	Depositions	Prepare correspondence to and from Kersh regarding Marriott contract for room; prepare correspondence to Tabor and team regarding planning to attend Larsen deposition on August 27 in Fresno and forwarding notice of deposition of Larsen;	0.3	1075	\$322.50
Chapman, Cynthia	08/08/19	Depositions	Review Caddell correspondence to and from Kersh regarding Marriott contract for room; review Caddell correspondence to Tabor and team regarding Larsen deposition in Fresno and forwarding notice of deposition of Larsen;	0.2	850	\$170.00
Kersh, Kathy	08/13/19	Depositions	Review email from Tabor; book hotel room for Tabor in Fresno online; respond to Tabor email; email to Marriott regarding coffee service and meeting proceeding on 8/27	0.3	325	\$97.50
Caddell, Michael	08/16/19	Depositions	Review Tamborelli correspondence to and from Sartell and team regarding sending revised notice of deposition for the 22nd; respond; review Sartell correspondence regarding discussing a division of labor with respect to Kang's deposition; respond;	0.3	1075	\$322.50
Chapman, Cynthia	08/16/19	Depositions	Review Tamborelli correspondence to and from Sartell and team regarding sending revised notice of deposition; review Caddell response; review Sartell correspondence regarding discussing a division of labor with respect to Kang's deposition; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	08/19/19	Depositions	Review Tamborelli correspondence forwarding Kang amended notice of deposition; respond; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	08/19/19	Depositions	Review Tamborelli correspondence forwarding Kang amended notice of deposition; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	08/20/19	Pleadings and Service	Review Summons Returned Executed: Credit Bureau Connection, Inc. served on 10/4/2018, answer due 10/25/2018;	0.1	1075	\$107.50
Kersh, Kathy	08/20/19	Pleadings and Service	Download updated docket sheet; review docket sheet re: summons returned executed; e-file summons; telephone call to clerk re: summons; update hard copy files	1.0	325	\$325.00
Caddell, Michael	08/21/19	Depositions	Review multiple Sartell correspondence regarding scheduling telephone conference regarding deposition; review Tabor response; respond; review Tabor correspondence to and from Tamborelli and team forwarding draft protective order;	0.3	1075	\$322.50
Chapman, Cynthia	08/21/19	Depositions	Review multiple Sartell correspondence regarding scheduling telephone conference regarding deposition; review Tabor response; review Caddell response; review Tabor correspondence to and from Tamborelli and team forwarding draft protective order;	0.3	850	\$255.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	08/21/19	Depositions	Teleconference with Jordan Sartell regarding motion to compel and deposition preparation.	0.5	750	\$375.00
Caddell, Michael	08/22/19	Depositions	Review Pro Hac Vice Application and Proposed Order submitted by Sung Gon Kang for attorney Jordan M. Sartell to appear Pro Hac Vice. (Filing fee \$ 225, receipt number 0972-8420070) (Francis, James); review Kabacinski correspondence to judge forwarding Word version of Pro Hac Vice Application for Jordan Sartell, of this firm, to represent Plaintiff Sung Gon Kang; review Sartell correspondence to and from team regarding deposition of Kang;	0.2	1075	\$215.00
Chapman, Cynthia	08/22/19	Depositions	Review Pro Hac Vice Application and Proposed Order or attorney Jordan M. Sartell to appear Pro Hac Vice; review Sartell correspondence to and from team regarding deposition of Kang;	0.2	850	\$170.00
Tabor, Amy	08/22/19	Depositions	Prepare for Frank Larsen deposition.	2.0	750	\$1,500.00
Caddell, Michael	08/23/19	Depositions	Prepare correspondence to and from Sartell and team regarding deposition of Kang; prepare for Larsen deposition;	1.8	1075	\$1,935.00
Chapman, Cynthia	08/23/19	Depositions	Review Caddell correspondence to and from Sartell and team regarding deposition of Kang;	0.1	850	\$85.00
Tabor, Amy	08/23/19	Depositions	Prepare for Larsen deposition.	4.0	750	\$3,000.00
Kersh, Kathy	08/23/19	Depositions	Review email from co-counsel paralegal; review local rules in ED of CA; respond to email, download file-stamped document; conference with Tabor about exhibits for Larsen depo; prepare materials for depo exhibits; review Veritext depo confirmation	0.5	325	\$162.50
Tabor, Amy	08/24/19	Depositions	Prepare for Larsen deposition.	2.0	750	\$1,500.00
Caddell, Michael	08/25/19	Depositions	Review Tamborelli correspondence to and from team regarding cancelling Larsen deposition; respond; review Tabor correspondence to and from team regarding cancelling travel arrangements; respond;	0.4	1075	\$430.00
Chapman, Cynthia	08/25/19	Depositions	Review Tamborelli correspondence to and from team regarding cancelling Larsen deposition; review Caddell response; review Tabor correspondence to and from team regarding cancelling travel arrangements; review Caddell response; conf with Caddell;	0.4	850	\$340.00
Caddell, Michael	08/26/19	Depositions	Review multiple Kersh correspondence to and from team regarding notifying Stratos legal regarding Larsen deposition; review Tabor correspondence to and from Tamborelli and team regarding Larsen deposition; review Tabor correspondence to and from Sartell regarding Larsen deposition, class discovery deadline, and informal dispute resolution hearing; respond; review Sartell correspondence to and from team regarding Pre-MCC to dos and forwarding discovery correspondence; prepare correspondence to and from Kersh, Labbe regarding cancellation of Larsen deposition and regarding nonrefundable expenses; review Sartell correspondence to and from Kusamura, team and counsel regarding Informal Discovery Conference Request;	1.0	1075	\$1,075.00
Chapman, Cynthia	08/26/19	Depositions	Review multiple Kersh correspondence to and from team regarding notifying Stratos legal regarding Larsen deposition; review Tabor correspondence to and from Tamborelli and team regarding Larsen deposition; review Tabor correspondence to and from Sartell regarding Larsen deposition, class discovery deadline, and informal dispute resolution hearing; review Caddell response; review Sartell correspondence to and from team regarding Pre-MCC to dos and forwarding discovery correspondence; review Caddell correspondence to and from Kersh, Labbe regarding cancellation of Larsen deposition and regarding nonrefundable expenses; review Sartell correspondence to and from Kusamura, team and counsel regarding Informal Discovery Conference Request;	0.6	850	\$510.00
Tabor, Amy	08/26/19	Depositions	Cancel Larsen deposition arrangements; telephone conference with Jordan Sartell regarding tasks and status; outline discovery tasks and deadlines; review email correspondence regarding setting informal discovery hearing; review exhibits; outline elements of proof for class certification.	3.0	750	\$2,250.00
Kersh, Kathy	08/26/19	Depositions	Send emails to hotel and court reporter to cancel Frank Larsen depo; telephone calls with same; sign cancellation document and scan to network; return agreement to hotel; provide new credit card information; review and respond to Tabor email about cancellation; review Tabor email about replacing poor copies of depo exhibits; email to Stratos regarding same; review response; email to Tabor regarding replacement procedure; review response; compare depo exhibits with copies in network; identify poor quality copies and replacements	2.0	325	\$650.00
Caddell, Michael	08/27/19	Depositions	Review Tabor correspondence to and from Tamborelli and team regarding following up on when Larsen will be available for deposition;	0.3	1075	\$322.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	08/27/19	Depositions	Review Tabor correspondence to and from Tamborelli and team regarding Larsen deposition availability;	0.1	850	\$85.00
Tabor, Amy	08/27/19	Depositions	Review correspondence from Jordan Sartell regarding Kang deposition and preparation for Larsen deposition; prepare correspondence to opposing counsel regarding deposition scheduling.	0.5	750	\$375.00
Caddell, Michael	08/28/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding outstanding discovery issues;	0.3	1075	\$322.50
Chapman, Cynthia	08/28/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding outstanding discovery issues;	0.2	850	\$170.00
Caddell, Michael	08/29/19	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding outstanding discovery issues;	0.3	1075	\$322.50
Chapman, Cynthia	08/29/19	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding outstanding discovery issues;	0.2	850	\$170.00
Tabor, Amy	08/29/19	Motion Practice	Teleconference with Michael Caddell and Cynthia Chapman regarding discovery tasks and status; prepare email to Jordan Sartell regarding discovery tasks and status.	0.5	750	\$375.00
Kersh, Kathy	08/29/19	Depositions	Review emails from Tabor; compare documents; respond to email; save documents in depo prep folder	0.2	325	\$65.00
Caddell, Michael	08/30/19	Written Discovery	Review Tamborelli correspondence to and from Sartell, Tabor, Francis regarding draft language for response; review Tabor correspondence to and from Sartell and team regarding Tamborelli correspondence and regarding giving the Court notice in letter brief that he will be seeking an extension of the October 4 discovery deadline; respond;	0.3	1075	\$322.50
Chapman, Cynthia	08/30/19	Written Discovery	Review Tamborelli correspondence to and from Sartell, Tabor, Francis regarding draft language for response; review Tabor correspondence to and from Sartell and team regarding Tamborelli correspondence and regarding letter brief seeking an extension of the October 4 discovery deadline; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	08/30/19	Motion Practice	Review correspondence from oppositng counsel regarding discovery disputes; prepare email to Jordan Sartell regarding motion to compel.	0.2	750	\$150.00
Caddell, Michael	09/02/19	Written Discovery	Review Sartell correspondence to and from team regarding outstanding discovery issues and regarding telephonic hearing on the 20th; respond;	0.2	1075	\$215.00
Chapman, Cynthia	09/02/19	Written Discovery	Review Sartell correspondence to and from team regarding outstanding discovery issues and regarding telephonic hearing on the 20th; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	09/03/19	Written Discovery	Review Sartell correspondence to and from Gonzalez, Kusamura, Tamborelli, counsel and team regarding all parties are available to participate on September 20, 2019 Informal Discovery Conference Request; review MINUTE ORDER: ***TEXT ENTRY ONLY*** The Court is in receipt of the parties' request for an informal discovery dispute conference. A telephonic discovery dispute conference is SET for September 20, 2019, at 11:00 AM before Magistrate Judge Sheila K. Oberto. The parties shall call (888) 557-8511, access code 6208204# at the scheduled time. By no later than September 13, 2019, each party shall each provide the Court via email at skoorders@caed.uscourts.gov a 2-3 page summary (exclusive of attachments or exhibits) of their dispute, complete with relevant legal authority. The summaries do not need to be filed, however, they do need to be served on opposing counsel. Minute Order signed by Magistrate Judge Sheila K. Oberto on 9/3/2019; review Sartell correspondence to and from Tamborelli and team regarding producing the denial of the tender of defense letter; review Sartell correspondence to and from team forwarding link to get to the zip file w/Mr. Kang's depo transcript and exhibits; respond;	0.8	1075	\$860.00
Chapman, Cynthia	09/03/19	Written Discovery	Review Sartell correspondence to and from Gonzalez, Kusamura, Tamborelli, counsel and team regarding Informal Discovery Conference Request; review Minute Order regarding request for informal discovery dispute conference; review Sartell correspondence to and from Tamborelli and team regarding producing denial of the tender of defense letter; review Sartell correspondence to and from team forwarding link to. Kang's depo transcript and exhibits; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	09/03/19	Depositions	Review court order setting hearing; calendar deadlines; review correspondence from Jordan Sartell regarding Kang deposition.	0.2	750	\$150.00
Caddell, Michael	09/04/19	Depositions	Review Sartell correspondence to and from team regarding Kang deposition files;	0.2	1075	\$215.00
Chapman, Cynthia	09/04/19	Depositions	Review Sartell correspondence to and from team regarding Kang deposition files;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	09/04/19	Depositions	Review Kang deposition transcript.	2.0	750	\$1,500.00
Kersh, Kathy	09/04/19	Pleadings and Service	Review email from Tabor; download Kang deposition and exhibits; review same; respond to Tabor email	0.2	325	\$65.00
Caddell, Michael	09/05/19	Pleadings and Service	Review Pro Hac Vice Order signed by Magistrate Judge Sheila K. Oberto on 9/2/2019. Attorney, Jordan Sartell added PHV for Plaintiff, Sung Gon Kang;	0.1	1075	\$107.50
Chapman, Cynthia	09/05/19	Pleadings and Service	Review Pro Hac Vice Order signed by Magistrate Judge Sheila K. Oberto on 9/2/2019;	0.1	850	\$85.00
Caddell, Michael	09/12/19	Depositions	Review Tamborelli correspondence to and from Sartell and team forwarding denial of the tender of defense; review Tabor correspondence to and from Sartell and team regarding the policy has an exclusion for the Fair Credit Reporting Act and regarding status of letter brief; review Tabor correspondence to and from Tamborelli and team regarding dates for depositions of David Daniel and Leanne Cobb; review Sartell correspondence to and from Tabor and team forwarding draft letter brief for review and revisions; review and respond; conf w/ Chapman;	1.1	1075	\$1,182.50
Chapman, Cynthia	09/12/19	Depositions	Review Tamborelli correspondence to and from Sartell and team forwarding denial of the tender of defense; review Tabor correspondence to and from Sartell and team regarding the policy exclusion for the Fair Credit Reporting Act and regarding status of letter brief; review Tabor correspondence to and from Tamborelli and team regarding dates for depositions of David Daniel and Leanne Cobb; review Sartell correspondence to and from Tabor and team forwarding draft letter brief for review and revisions; review Caddell response; conf w/ Caddell;	0.8	850	\$680.00
Kersh, Kathy	09/12/19	Pleadings and Service	Download new production from CBC	0.1	325	\$32.50
Caddell, Michael	09/13/19	Written Discovery	Review Tabor correspondence to and from Sartell and team forwarding comments to Plaintiffs' Summary of Dispute; review Tamborelli correspondence to and from Tabor and team regarding permission to sign his name to protective order and submit; review multiple Sartell correspondence to and from Tabor and team forwarding final draft of the letter brief for filing; respond; review Sartell correspondence to and from Judge Oberto, Tamborelli, counsel and team forwarding Plaintiff's summary of the parties' discovery dispute and supporting exhibits for filing; review Kusamura correspondence to Sartell, Tamborelli, counsel and team regarding a courtesy copy if required for the exhibit; review Tamborelli correspondence to Kusamura, Sartell, counsel and team forwarding CBC position paper;	1.0	1075	\$1,075.00
Chapman, Cynthia	09/13/19	Written Discovery	Review Tabor correspondence to and from Sartell and team forwarding comments to Plaintiffs' Summary of Dispute; review Tamborelli correspondence to and from Tabor and team regarding protective; review multiple Sartell correspondence to and from Tabor and team forwarding final draft letter brief; review Caddell response; review Sartell correspondence to and from Judge Oberto, Tamborelli, counsel and team forwarding Plaintiff's summary of the parties' discovery dispute and supporting exhibits for filing; review Kusamura correspondence to Sartell, Tamborelli, counsel and team regarding a courtesy copy if required for the exhibit; review Tamborelli correspondence to Kusamura, Sartell, counsel and team forwarding CBC's position paper;	0.9	850	\$765.00
Tabor, Amy	09/13/19	Depositions	Review and comment on draft letter brief; research legal issues for draft letter brief; review correspondence from opposing counsel regarding deposition scheduling and protective order.	3.0	750	\$2,250.00
Kersh, Kathy	09/13/19	Pleadings and Service	Review new production from defendant; email to Tabor regarding same; download letter to judge to network	0.2	325	\$65.00
Caddell, Michael	09/14/19	Written Discovery	Review Tabor correspondence to Sartell and team regarding FedExing a courtesy copy of Plaintiff's summary of the parties' discovery dispute and supporting exhibits to the judge;	0.1	1075	\$107.50
Chapman, Cynthia	09/14/19	Written Discovery	Review Tabor correspondence to Sartell and team regarding FedExing a courtesy copy of Plaintiff's summary of the parties' discovery dispute and supporting exhibits to the judge;	0.1	850	\$85.00
Kersh, Kathy	09/14/19	Pleadings and Service	Review email from Tabor; prepare judge's copy of letter and exhibits; prepare fed ex box; trip to Fed Ex to send judge's copy; prepare correspondence to Judge Oberto.	0.5	325	\$162.50
Caddell, Michael	09/16/19	Written Discovery	Review Sartell correspondence to and from Tabor and team regarding FedExing Exhibit to court; review Kersh correspondence to team regarding courtesy copy has been delivered;	0.1	1075	\$107.50
Chapman, Cynthia	09/16/19	Written Discovery	Review Sartell correspondence to and from Tabor and team regarding FedExing Exhibit to court; review Kersh correspondence to team regarding courtesy copy has been delivered;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Kersh, Kathy	09/16/19	Pleadings and Service	Download scan of judge's copy to network; review Fed Ex delivery email.	0.1	325	\$32.50
Caddell, Michael	09/20/19	Written Discovery	Review Tabor correspondence regarding telephone conference; prepare multiple responses; review Sartell correspondence to and from team regarding motion to compel hearing; respond; review Minutes (Text Only) for proceedings before Magistrate Judge Sheila K. Oberto: Telephonic Dispute held on 9/20/2019. Order to follow. Plaintiffs Counsel Amy Tabor & Jordan Sartell present. Defendants Counsel John Tamborelli present; review Tabor correspondence to Sartell regarding OFAC Database Expert;	0.6	1075	\$645.00
Chapman, Cynthia	09/20/19	Written Discovery	Review Tabor correspondence regarding telephone conference; review multiple Caddell responses; review Sartell correspondence to and from team regarding motion to compel hearing; review Caddell response; review Minutes (Text Only) for proceedings before Magistrate Judge Sheila K. Oberto: Telephonic Dispute held on 9/20/2019. Order to follow. Plaintiffs Counsel Amy Tabor & Jordan Sartell present. Defendants Counsel John Tamborelli present; review Tabor correspondence to Sartell regarding OFAC Database Expert;	0.3	850	\$255.00
Tabor, Amy	09/20/19	Depositions	Prepare for and attend telephonic discovery hearing; teleconference with potential database expert regarding deposition questions; teleconference with Jordan Sartell regarding discovery plan; correspond via email with Michael Caddell regarding discovery hearing.	2.5	750	\$1,875.00
Kersh, Kathy	09/20/19	Written Discovery	Review CBC documents productions and split into individual documents; load into Lexbe and code documents	1.5	325	\$487.50
Caddell, Michael	09/23/19	Written Discovery	Prepare multiple correspondence to and from Tabor, Sartell regarding database expert; review multiple Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions of Larsen, Daniel, Cobb; respond; review Order re Discovery - Motion for Class Certification due by 12/27/2019, Opposition due by 1/10/2020. Motion for Class Certification set for 1/21/2020 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii, Status Conference set for 3/24/2020 at 10:15 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto. signed by Magistrate Judge Sheila K. Oberto on 9/23/2019;	0.8	1075	\$860.00
Chapman, Cynthia	09/23/19	Written Discovery	Review multiple Caddell correspondence to and from Tabor, Sartell regarding database expert; review multiple Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions of Larsen, Daniel, Cobb; review Caddell response; review Order re Discovery signed by Magistrate Judge Sheila K. Oberto on 9/23/2019;	0.4	850	\$340.00
Tabor, Amy	09/23/19	Depositions	Calendar deadlines for class certification briefing; review correspondence with John Tamborelli regarding deposition scheduling; review order granting motion to compel; outline deposition questions for Frank Larsen.	2.0	750	\$1,500.00
Kersh, Kathy	09/23/19	Pleadings and Service	Review signed order from court; download file-stamped copy; update case management notebook; update calendar	1.0	325	\$325.00
Kersh, Kathy	09/24/19	Pleadings and Service	Continue updating case management notebook	0.5	325	\$162.50
Caddell, Michael	09/30/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions and producing documents;	0.3	1075	\$322.50
Chapman, Cynthia	09/30/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions and producing documents;	0.2	850	\$170.00
Caddell, Michael	10/01/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions and producing documents; respond;	0.3	1075	\$322.50
Chapman, Cynthia	10/01/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions and producing documents; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	10/02/19	Depositions	Review Sartell correspondence to and from team regarding Tamborelli response to Rescheduling Depositions and Producing Documents; respond;	0.3	1075	\$322.50
Chapman, Cynthia	10/02/19	Depositions	Review Sartell correspondence to and from team regarding Tamborelli response to Rescheduling Depositions and Producing Documents; review Caddell response;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	10/04/19	Depositions	Review multiple Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions and producing documents; review multiple Sartell correspondence to and from team regarding Rule 72; respond; review Tamborelli correspondence Sartell and team regarding able to produce the dispute protocol and regarding status of signed protective order; review Sartell correspondence to team regarding the hearing was off record and regarding reconstruct some of the more important parts (i.e., the dates by which Tamborelli said he'd do stuff) in a declaration; review Tabor correspondence to and from Sartell and team regarding notes of the hearing and forwarding regarding same;	0.9	1075	\$967.50
Chapman, Cynthia	10/04/19	Depositions	Review multiple Sartell correspondence to and from Tamborelli and team regarding rescheduling depositions and producing documents; review multiple Sartell correspondence to and from team regarding Rule 72; review Caddell response; review Tamborelli correspondence Sartell and team regarding able to produce the dispute protocol and regarding status of signed protective order; review Sartell correspondence to team regarding hearing; review Tabor correspondence to and from Sartell and team regarding notes of the hearing and forwarding regarding same;	0.6	850	\$510.00
Kersh, Kathy	10/04/19	Pleadings and Service	Review emails from Tabor and Sartell regarding filing protective order; create calendar entries	0.1	325	\$32.50
Caddell, Michael	10/07/19	Written Discovery	Review Objections by Defendant Credit Bureau Connection, Inc.; review Tamborelli correspondence to Kusamura, Sartell and team forwarding objections; respond;	0.3	1075	\$322.50
Chapman, Cynthia	10/07/19	Written Discovery	Review Objections by Defendant Credit Bureau Connection, Inc.; review Tamborelli correspondence to Kusamura, Sartell and team forwarding objections; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	10/08/19	Written Discovery	Review Tamborelli correspondence to and from counsel and team regarding scheduling meet and confer per discovery order;	0.2	1075	\$215.00
Chapman, Cynthia	10/08/19	Written Discovery	Review Tamborelli correspondence to and from counsel and team regarding scheduling meet and confer per discovery order;	0.1	850	\$85.00
Caddell, Michael	10/09/19	Pleadings and Service	Prepare correspondence to Tabor, Sartell and team regarding responding to Tamborelli regarding scheduling meet and confer;	0.3	1075	\$322.50
Chapman, Cynthia	10/09/19	Pleadings and Service	Review Caddell correspondence to Tabor, Sartell and team regarding responding to Tamborelli regarding scheduling meet and confer;	0.1	850	\$85.00
Caddell, Michael	10/10/19	Pleadings and Service	Review Sartell correspondence to and from team regarding Tamborelli copying court and regarding scheduling meet and confer; review Sartell correspondence to and from Tamborelli and team regarding request for reconsideration, scheduling meet and confer and not to copy court staff, etc.; conf /w Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	10/10/19	Pleadings and Service	Review Sartell correspondence to and from team regarding scheduling meet and confer; review Sartell correspondence to and from Tamborelli and team regarding request for reconsideration, scheduling meet and confer; conf w/ Caddell;	0.3	850	\$255.00
Tabor, Amy	10/10/19	Motion Practice	Review notes of call with expert regarding data formats; correspond via email with Jordan Sartell regarding discovery meet and confer.	0.1	750	\$75.00
Caddell, Michael	10/11/19	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli, and team regarding defendant will not consent to our request for a stipulated extension and regarding scheduling meet and confer;	0.3	1075	\$322.50
Chapman, Cynthia	10/11/19	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli, and team regarding defendant will not consent to our request for a stipulated extension and regarding scheduling meet and confer;	0.2	850	\$170.00
Caddell, Michael	10/14/19	Depositions	Review Sartell correspondence to and from Tamborelli, and team regarding depositions, etc.;	0.3	1075	\$322.50
Chapman, Cynthia	10/14/19	Depositions	Review Sartell correspondence to and from Tamborelli, and team regarding depositions, etc.;	0.2	850	\$170.00
Caddell, Michael	10/15/19	Depositions	Review Tamborelli correspondence to and from Sartell, Francis, Soumilas, and team regarding responses regarding depositions, etc.; review Opposition by Plaintiff Sung Gon Kang to [38] Objections;	0.4	1075	\$430.00
Chapman, Cynthia	10/15/19	Depositions	Review Tamborelli correspondence to and from Sartell, Francis, Soumilas, and team regarding responses regarding depositions, etc.; review Opposition by Plaintiff Sung Gon Kang to Objections;	0.2	850	\$170.00
Caddell, Michael	10/16/19	Depositions	Prepare correspondence to and from Sartell and team regarding good job on the opposition;	0.2	1075	\$215.00
Chapman, Cynthia	10/16/19	Depositions	Review Caddell correspondence to and from Sartell and team regarding opposition;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	10/16/19	Motion Practice	Review response to Rule 72 motion and supporting documents; correspond via email with co-counsel regarding Rule 72 motion.	1.0	750	\$750.00
Caddell, Michael	10/17/19	Pleadings and Service	Review Declaration of Larsen;	0.2	1075	\$215.00
Chapman, Cynthia	10/17/19	Pleadings and Service	Review Declaration of Larsen;	0.2	850	\$170.00
Caddell, Michael	10/18/19	Pleadings and Service	Review Soumilas correspondence to and from team regarding filing motion to strike declaration of Larsen;	0.2	1075	\$215.00
Chapman, Cynthia	10/18/19	Pleadings and Service	Review Soumilas correspondence to and from team regarding filing motion to strike declaration of Larsen;	0.2	850	\$170.00
Caddell, Michael	10/21/19	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding draft motion to strike and forwarding document on same;	0.3	1075	\$322.50
Chapman, Cynthia	10/21/19	Pleadings and Service	Review multiple Sartell correspondence to and from team regarding draft motion to strike and forwarding document on same;	0.3	850	\$255.00
Tabor, Amy	10/21/19	Motion Practice	Review and comment on draft motion to strike.	0.1	750	\$75.00
Caddell, Michael	10/22/19	Pleadings and Service	Review Motion to Strike re [40] Declaration. by Sung Gon Kang. Motion Hearing set for 11/25/2019 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii;	0.2	1075	\$215.00
Chapman, Cynthia	10/22/19	Pleadings and Service	Review Motion to Strike re Declaration by Sung Gon Kang;	0.1	850	\$85.00
Caddell, Michael	10/28/19	Written Discovery	Review Sartell correspondence to and from Tamborelli, and team regarding consenting to an additional 60 days to conduct class discovery after the district court rules on defendant's request for reconsideration, with all other deadlines to be extended accordingly;	0.3	1075	\$322.50
Chapman, Cynthia	10/28/19	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding consenting to additional 60 days to conduct class discovery after the district court rules on defendant's request for reconsideration, with all other deadlines to be extended accordingly;	0.2	850	\$170.00
Caddell, Michael	10/29/19	Pleadings and Service	Review Sartell correspondence to and from Tabor and team forwarding for review the motion to extend case management schedule; review Motion for 60-Day Extension of Time to Case Management Schedule by Sung Gon Kang. Motion Hearing set for 12/2/2019 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii;	0.2	1075	\$215.00
Chapman, Cynthia	10/29/19	Pleadings and Service	Review Sartell correspondence to and from Tabor and team forwarding the motion to extend case management schedule;	0.2	850	\$170.00
Tabor, Amy	10/29/19	Motion Practice	Review and comment on draft motion for extension of schedule.	0.2	750	\$150.00
Caddell, Michael	11/04/19	Pleadings and Service	Review Minute Order *** Text Only *** The Motion for Extension of Time, Doc. No. [42], currently set for 12/02/2019 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii, is Reset for 12/11/2019 at 9:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto. Minute order signed by Senior District Judge Anthony W. Ishii on 11/04/2019;	0.1	1075	\$107.50
Chapman, Cynthia	11/04/19	Pleadings and Service	Review Minute Order signed by Senior District Judge Anthony W. Ishii on 11/04/2019;	0.1	850	\$85.00
Caddell, Michael	11/08/19	Depositions	Review Order Denying (1) Defendant's Objections to Magistrate Judge's Order and (2) Plaintiff's [41] Motion to Strike, Signed by District Judge Anthony W. Ishii on 11/8/2019, it is Hereby Ordered that Defendant's Objections (Doc. No. 38) to the Magistrate Judge's Order is Denied, and Plaintiff's Motion to Strike (Doc. No. 41) is Denied, and the Hearing on the Motion to Strike is Vacated; review Sartell correspondence to and from team regarding same; prepare multiple responses;	0.6	1075	\$645.00
Chapman, Cynthia	11/08/19	Depositions	Review Order Denying (1) Defendant's Objections to Magistrate Judge's Order and (2) Plaintiff's Motion to Strike, Signed by District Judge Anthony W. Ishii on 11/8/2019; review Sartell correspondence to and from team; review multiple Caddell responses;	0.3	850	\$255.00
Tabor, Amy	11/08/19	Motion Practice	Review order denying motion for reconsideration; correspond via email with Jordan Sartell regarding next steps.	0.2	750	\$150.00
Kersh, Kathy	11/08/19	Pleadings and Service	Download file-stamped copy of order and save to network	0.1	325	\$32.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	11/11/19	Depositions	Review multiple Sartell correspondence to and from team regarding scheduling deposition dates for Larsen, Daniel and Cobb and forwarding notices of depositions for same; respond; review Sartell correspondence to and from Tamborelli and team forwarding notices of deposition for Frank Larsen, David Daniel, and Leanne Cobb. December 3 and 4; review Sartell correspondence to and from Tabor and team regarding handling the PO;	0.5	1075	\$537.50
Chapman, Cynthia	11/11/19	Depositions	Review multiple Sartell correspondence to and from team regarding deposition dates for Larsen, Daniel and Cobb and forwarding notices of depositions for same; review Caddell response; review Sartell correspondence to and from Tamborelli and team forwarding notices of deposition for Frank Larsen, David Daniel, and Leanne Cobb. December 3 and 4; review Sartell correspondence to and from Tabor and team;	0.4	850	\$340.00
Tabor, Amy	11/11/19	Depositions	Correspond via email with Jordan Sartell and Michael Caddell regarding deposition scheduling and protective order.	0.1	750	\$75.00
Caddell, Michael	11/12/19	Written Discovery	Review Minute Order ***Text Entry Only*** The Court is in receipt of Plaintiff's ex parte motion for extension of case management schedule, seeking to enlarge the class certification discovery deadline and related case management deadlines by 60 days following the assigned district judge's ruling on Defendant's request for reconsideration of the undersigned's ruling on the parties' discovery dispute. (Doc. [42].) By order issued November 8, 2019, the district judge denied Defendant's request for reconsideration. (Doc. [44].) Given that the deadline for class certification discovery has passed and other deadlines are impending, the Court hereby VACATES pursuant to this Court's Local Rule 230(g) the hearing on the ex parte motion set for December 11, 2019, and orders Defendant to file an opposition, or statement of non-opposition, to the ex parte motion by no later than November 19, 2019. The Court will issue its ruling on the papers as soon as is practicable after that date. Minute Order signed by Magistrate Judge Sheila K. Oberto on 11/12/2019; review Stipulation and Proposed Order for Protective Order by Sung Gon Kang; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	11/12/19	Written Discovery	Review Minute Order regarding Plaintiff's ex parte motion for extension of case management schedule; review Stipulation and Proposed Order for Protective Order;	0.2	850	\$170.00
Tabor, Amy	11/12/19	Motion Practice	Review order vacating hearing; calendar deadlines.	0.1	750	
Kersh, Kathy	11/12/19	Pleadings and Service	Review stipulated protective order; type signature on signature line; review local rules regarding signatures of multiple attorneys on a document; review and respond to Tabor email; telephone call to ECF clerk; telephone call to Ishii's deputy regarding Word copy of order; email Word copy of order to Oberto; prepare email to Oberto; e-file stipulated protective order; print text order and download same to network	1.5	325	\$487.50
Caddell, Michael	11/13/19	Pleadings and Service	Review Order Denying without Prejudice Stipulated Protective Order;	0.1	1075	\$107.50
Chapman, Cynthia	11/13/19	Pleadings and Service	Review Order Denying without Prejudice Stipulated Protective Order;	0.1	850	\$85.00
Caddell, Michael	11/19/19	Pleadings and Service	Review Opposition by Credit Bureau Connection, Inc. to [42] Motion for Extension of Time;	0.2	1075	\$215.00
Chapman, Cynthia	11/19/19	Pleadings and Service	Review Opposition by Credit Bureau Connection, Inc. to Motion for Extension of Time;	0.2	850	\$170.00
Tabor, Amy	11/19/19	Motion Practice	Review response to motion for schedule extension.	0.1	750	
Caddell, Michael	11/20/19	Written Discovery	Review Sartell correspondence to and from Tabor and team regarding Tamborelli asking the Magistrate to reconsider her discovery ruling; respond;	0.3	1075	\$322.50
Caddell, Michael	11/21/19	Pleadings and Service	Review Order Granting ex Parte Motion for Extension of Case Management Schedule; Motion for Class Certification Hearing Set for 4/20/2020 at 01:30 Pm in Courtroom 2 (Awi) Before District Judge Anthony W. Ishii, Status Conference Set for 6/23/2020 at 10:15 Am in Courtroom 7 (Sko) Before Magistrate Judge Sheila K. Oberto, Signed by Magistrate Judge Sheila K. Oberto on 11/21/2019;	0.1	1075	\$107.50
Chapman, Cynthia	11/21/19	Pleadings and Service	Review Order Granting ex Parte Motion for Extension of Case Management Schedule;	0.1	850	\$85.00
Caddell, Michael	11/25/19	Written Discovery	Review Sartell correspondence to Tamborelli and team forwarding correspondence regarding discovery and regarding scheduling meet and confer regarding same;	0.1	1075	\$107.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	11/25/19	Written Discovery	Review Sartell correspondence to Tamborelli and team forwarding correspondence regarding discovery and regarding scheduling meet and confer;	0.1	850	\$85.00
Caddell, Michael	11/26/19	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding away for holiday and regarding scheduling meet and confer; respond;	0.2	1075	\$215.00
Chapman, Cynthia	11/26/19	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding scheduling meet and confer; review Caddell response;	0.1	850	\$85.00
Tabor, Amy	11/26/19	Depositions	Review email correspondence regarding deposition scheduling.	0.1	750	\$75.00
Caddell, Michael	12/02/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding the availability of compelled witnesses despite numerous requests to do so and regarding providing firm dates for the depositions of Frank Larsen, David Daniel and Leanne Cobb by the close of business today or we will be forced to conclude that you are not litigating in good faith; review Tamborelli correspondence to and from Sartell and team regarding let's discuss at 2 pm pst today as need to resolve protective order and court hearing on the issue of the reconsideration with the magistrate;	0.3	1075	\$322.50
Chapman, Cynthia	12/02/19	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding the availability of compelled witnesses despite numerous requests to do so and regarding providing firm dates for the depositions of Frank Larsen, David Daniel and Leanne Cobb; review Tamborelli correspondence to and from Sartell and team regarding resolving protective order and court hearing on the issue of the reconsideration with the magistrate;	0.2	850	\$170.00
Tabor, Amy	12/02/19	Motion Practice	Review email correspondence regarding meet and confer and anticipated motion to compel.	0.1	750	\$75.00
Caddell, Michael	12/03/19	Pleadings and Service	Review Sartell correspondence to and from team regarding Tamborelli and regarding protective order regarding meet and confer;	0.2	1075	\$215.00
Chapman, Cynthia	12/03/19	Pleadings and Service	Review Sartell correspondence to and from team regarding Tamborelli and regarding protective order and meet and confer;	0.1	850	\$85.00
Caddell, Michael	12/04/19	Written Discovery	Review multiple Tamborelli correspondence to and from Sartell and team regarding meet and confer; prepare multiple responses; review Tamborelli correspondence to and from Sartell and team regarding discovery issues, meet and confer; t/conf w/ Tamborelli, et al.; review Tabor correspondence to and from Sartell forwarding a Word version of the protective order; review Sartell correspondence to Tamborelli and team forwarding discovery correspondence;	1.2	1075	\$1,290.00
Chapman, Cynthia	12/04/19	Written Discovery	Review multiple Tamborelli correspondence to and from Sartell and team regarding meet and confer; review multiple Caddell responses; review Tamborelli correspondence to and from Sartell and team regarding discovery issues, meet and confer; t/conf w/ Tamborelli, et al.; review Tabor correspondence to and from Sartell forwarding a Word version of the protective order; review Sartell correspondence to Tamborelli and team forwarding discovery correspondence;	0.3	850	\$255.00
Tabor, Amy	12/04/19	Motion Practice	Review briefing on discovery motions; review declarations; teleconference with Jordan Sartell, Mike Caddell, and John Tamborelli regarding discovery dispute; teleconference with Jordan Sartell regarding discovery dispute; prepare email to John Tamborelli regarding protective order.	1.5	750	\$1,125.00
Caddell, Michael	12/05/19	Written Discovery	Review Sartell correspondence to and from Kusamura, Tamborelli and team regarding parties have met and conferred and, having reached an impasse, would once again like to avail themselves of Judge Oberto's informal discovery dispute resolution procedure and please advise of Her Honor's earliest availability for a hearing and associated deadlines for summary papers; review Sartell correspondence to and from team regarding the Court's calendar suggests availability on Dec. 17-20; review Sartell correspondence to and from Tamborelli, Kusamura and team regarding Plaintiff agrees with Tamborelli's proposal and the parties will submit their position papers on Dec. 10 if that is acceptable to the Court; prepare correspondence to and from Tabor and team regarding comparing the declaration from Larson with his deposition testimony and see if there is a basis for retaking his deposition	0.5	1075	\$537.50
Chapman, Cynthia	12/05/19	Written Discovery	Review Sartell correspondence to and from Kusamura, Tamborelli and team regarding parties have met and conferred, reached an impasse, and need to invoke informal discovery dispute resolution procedure; review Sartell correspondence to and from team regarding the Court's calendar; review Sartell correspondence to and from Tamborelli, Kusamura and team regarding Tamborelli's; review Caddell correspondence to and from Tabor and team regarding comparing the declaration from Larson with his deposition testimony;	0.3	850	\$255.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	12/06/19	Pleadings and Service	Review Kusamura correspondence to Sartell, Tamborelli and team regarding Plaintiff agrees with Tamborelli's proposal and the parties will submit their position papers on Dec. 10 if that is acceptable to the Court;	0.1	1075	\$107.50
Chapman, Cynthia	12/06/19	Pleadings and Service	Review Kusamura correspondence to Sartell, Tamborelli and team regarding Tamborelli's;	0.1	850	\$85.00
Caddell, Michael	12/09/19	Pleadings and Service	Review Sartell correspondence to Tabor, Tamborelli regarding still awaiting redlines on the protective order;	0.2	1075	\$215.00
Chapman, Cynthia	12/09/19	Pleadings and Service	Review Sartell correspondence to Tabor, Tamborelli regarding redlines on the protective order;	0.1	850	\$85.00
Caddell, Michael	12/10/19	Written Discovery	Review Tamborelli correspondence to and from Sartell regarding redlines on the protective order; review Tamborelli correspondence to and from Sartell, Kusamura, Sartell and team forwarding letter brief; review Tamborelli correspondence to Tabor, Sartell forwarding joint revised proposed stipulated protective order; review Tabor correspondence to and from Sartell regarding Tamborelli's redline arguably address the first element of Local Rule 141.1(c), which requires description of the types of information eligible for protection under the order, with the description provided in general terms sufficient to reveal the nature of the information and forwarding documents on same; respond; review Tabor correspondence to and from Sartell forwarding comments in track changes to Declaration of Sartell and Plaintiffs' Dispute Position Paper; respond; review Sartell correspondence to Judge Oberto forwarding Plaintiffs' discovery dispute summary position paper and associated exhibits;	1.0	1075	\$1,075.00
Chapman, Cynthia	12/10/19	Written Discovery	Review Tamborelli correspondence to and from Sartell regarding redlines on the protective order; review Tamborelli correspondence to and from Sartell, Kusamura, Sartell and team forwarding letter brief; review Tamborelli correspondence to Tabor, Sartell forwarding joint revised proposed stipulated protective order; review Tabor correspondence to and from Sartell regarding Tamborelli's redline; review Caddell response; review Tabor correspondence to and from Sartell forwarding comments in track changes to Declaration of Sartell and Plaintiffs' Dispute Position Paper; review Caddell response; review Sartell correspondence to Judge Oberto forwarding Plaintiffs' discovery dispute summary position paper and associated exhibits;	0.6	850	\$510.00
Tabor, Amy	12/10/19	Motion Practice	Review CBC letter brief; review revised draft protective order; prepare email to co-counsel regarding revisions to protective order; teleconference with Jordan Sartell regarding letter brief on discovery dispute.	2.0	750	\$1,500.00
Kersh, Kathy	12/10/19	Pleadings and Service	Review Tabor email about ECF 47;download copy to network; review docket sheet online regarding new filings	0.1	325	\$32.50
Caddell, Michael	12/11/19	Pleadings and Service	Review Tabor correspondence to and from Sartell regarding proposed response to Tamborelli and forwarding revised joint proposed stipulated protective order; review Sartell correspondence to and from Tamborelli and team regarding protective order;	0.3	1075	\$322.50
Chapman, Cynthia	12/11/19	Pleadings and Service	Review Tabor correspondence to and from Sartell regarding proposed response to Tamborelli and forwarding revised joint proposed stipulated protective order; review Sartell correspondence to and from Tamborelli and team regarding protective order;	0.2	850	\$170.00
Caddell, Michael	12/12/19	Written Discovery	Review Minute Order: ***Text Entry Only*** The Court is in receipt of the parties' request for an informal discovery dispute conference and the parties' respective summaries of the dispute. A telephonic discovery dispute conference is SET for December 19, 2019, at 10:00 AM before Magistrate Judge Sheila K. Oberto. The parties shall call (888) 557-8511, access code 6208204# at the scheduled time. Minute Order signed by Magistrate Judge Sheila K. Oberto on 12/12/2019;	0.1	1075	\$107.50
Chapman, Cynthia	12/12/19	Written Discovery	Review Minute informal discovery dispute conference and the parties' respective summaries of the dispute;	0.1	850	\$85.00
Tabor, Amy	12/12/19	Written Discovery	Correspond via email with Jordan Sartell regarding data expert.	0.1	750	\$75.00
Tabor, Amy	12/17/19	Motion Practice	Teleconference with Jordan Sartell regarding ediscovery issues; teleconference with Jonathan Jaffe regarding potential engagement.	0.5	750	\$375.00
Caddell, Michael	12/18/19	Written Discovery	Review Tabor correspondence to and from team regarding telephone conference with Jaffe regarding ediscovery issues and forwarding Jaffe CV;	0.2	1075	\$215.00
Chapman, Cynthia	12/18/19	Written Discovery	Review Tabor correspondence to and from team regarding telephone conference with Jaffe regarding ediscovery issues and forwarding Jaffe CV;	0.2	850	\$170.00
Tabor, Amy	12/18/19	Written Discovery	Teleconference with Jonathan Jaffe; prepare email to co-counsel regarding retention of Jaffe; review materials from Kathy Kersh regarding Jonathan Jaffe; review Jaffe CV.	1.0	750	\$750.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Kersh, Kathy	12/18/19	Written Discovery	Review Tabor email about Jaffe; internet research regarding Jaffe; review Jaffe CV; download documents re: Jaffe; respond to Tabor email	3.0	325	\$975.00
Caddell, Michael	12/19/19	Depositions	Review Tabor correspondence to and from Sartell regarding hearing; respond; review Tabor correspondence to and from Sartell regarding status of hearing and Tamborelli; respond; t/conf w/ Court, et al.; review Tabor correspondence regarding judge setting dates for depositions; respond; prepare correspondence to and from Francis and team regarding assistance with depositions; review Order regarding Discovery, signed by Magistrate Judge Sheila K. Oberto on 12/19/2019;	1.1	1075	\$1,182.50
Chapman, Cynthia	12/19/19	Depositions	Review Tabor correspondence to and from Sartell regarding hearing; review Caddell response; review Tabor correspondence to and from Sartell regarding status of hearing and Tamborelli; review Caddell response; review Tabor correspondence regarding Judge setting dates for depositions; review Caddell response; review Caddell correspondence to and from Francis and team regarding assistance with depositions; review Order regarding Discovery, signed by Magistrate Judge Sheila K. Oberto on 12/19/2019; conf with Caddell;	0.8	850	\$680.00
Tabor, Amy	12/19/19	Motion Practice	Participate in telephonic discovery hearing; correspond via email with co-counsel regarding hearing; review order compelling discovery; calendar deadlines.	1.0	750	\$750.00
Caddell, Michael	12/20/19	Written Discovery	Review Tabor correspondence to and from team regarding retaining Jaffe and send him copies of Larsen deposition and declaration; respond;	0.3	1075	\$322.50
Chapman, Cynthia	12/20/19	Written Discovery	Review Tabor correspondence to and from team regarding retaining Jaffe; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	12/24/19	Depositions	Prepare correspondence to Tabor, Sartell, Soumilas, Francis regarding January 8 depositions;	0.2	1075	\$215.00
Chapman, Cynthia	12/24/19	Depositions	Review Caddell correspondence to Tabor, Sartell, Soumilas, Francis regarding January 8 depositions;	0.1	850	\$85.00
Tabor, Amy	12/27/19	Depositions	Review materials in preparation for Larsen deposition; correspond via email with Jonathan Jaffe regarding retention as consulting expert.	2.0	750	\$1,500.00
Tabor, Amy	12/30/19	Depositions	Review and revise Larsen depo outline.	1.0	750	\$750.00
Caddell, Michael	12/31/19	Depositions	Review Tamborelli correspondence to and from Sartell, Tabor and team forwarding CBC consumer dispute protocol and regarding proceeding with the depositions on the 9th;	0.2	1075	\$215.00
Chapman, Cynthia	12/31/19	Depositions	Review Tamborelli correspondence to and from Sartell, Tabor and team forwarding CBC consumer dispute protocol and proceeding with the depositions on the 9th;	0.2	850	\$170.00
Caddell, Michael	01/01/20	Depositions	Prepare multiple correspondence to and from Tamborelli and team regarding depositions; conf w/ Chapman;	0.3	1075	\$322.50
Chapman, Cynthia	01/01/20	Depositions	Review multiple Caddell correspondence to and from Tamborelli and team regarding depositions; conf with Caddell;	0.1	850	\$85.00
Caddell, Michael	01/02/20	Written Discovery	Review Tabor correspondence to and from team regarding telephone conference with Jaffe and forwarding executed Jaffe retainer;	0.2	1075	\$215.00
Chapman, Cynthia	01/02/20	Written Discovery	Review Tabor correspondence to and from team regarding telephone conference with Jaffe and forwarding executed Jaffe retainer;	0.1	850	\$85.00
Tabor, Amy	01/02/20	Depositions	Teleconference with Jonathan Jaffee regarding database issues; prepare Larsen deposition outline; correspond via email with opposing counsel regarding Larsen deposition.	5.0	750	\$3,750.00
Caddell, Michael	01/03/20	Depositions	Prepare correspondence to and from Tamborelli and team regarding update on the deposition schedule; prepare correspondence to and from Tabor and team regarding Jaffe and regarding issuing deposition notices, etc., and regarding order of depositions;	0.3	1075	\$322.50
Chapman, Cynthia	01/03/20	Depositions	Review Caddell correspondence to and from Tamborelli and team regarding update on the deposition schedule; review Caddell correspondence to and from Tabor and team regarding Jaffe and regarding issuing deposition notices, etc., and regarding order of depositions;	0.2	850	\$170.00
Tabor, Amy	01/03/20	Depositions	Draft Larsen deposition outline; review D. Larsen deposition.	4.5	750	\$3,375.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Kersh, Kathy	01/03/20	Depositions	Review Tabor email about new deposition date; email to Marriott Fresno; telephone call to Marriott Fresno; review emails about meeting room; prepare three new deposition notices; respond to Tabor email; email to Caddell regarding sleeping room; prepare correspondence to opposing counsel regarding deposition notices; review Caddell response.	0.9	325	\$292.50
Caddell, Michael	01/06/20	Depositions	Review multiple Kersh correspondence to and from team forwarding current drafts of the deposition notices for Frank Larsen, David Daniel, and Leanne Cobb on January 15; prepare multiple responses; review Kersh correspondence to and from Tamborelli, and team forwarding copies of deposition notices for Frank Larsen, David Daniel, and Leanne Cobb;	0.6	1075	\$645.00
Chapman, Cynthia	01/06/20	Depositions	Review multiple Kersh correspondence to and from team forwarding current drafts of the deposition notices for Frank Larsen, David Daniel, and Leanne Cobb on January 15; review multiple Caddell responses; review Kersh correspondence to and from Tamborelli, and team forwarding copies of deposition notices for Frank Larsen, David Daniel, and Leanne Cobb;	0.4	850	\$340.00
Tabor, Amy	01/06/20	Depositions	Review Darrin Larsen deposition; draft Frank Larsen deposition outline; correspond via email with Jonathan Jaffe regarding Larsen deposition.	4.5	750	\$3,375.00
Kersh, Kathy	01/06/20	Depositions	Revise deposition notices; email to Caddell regarding notices; email to Caddell regarding hotel room; telephone call to Marriott to rent sleeping room; telephone call to Miranda at Marriott re: meeting room; sign meeting room documents and upload payment information; print copy of meeting room agreement; revise correspondence to Tamborelli and prepare certified mail copies; send copies to Tamborelli by email	3.0	325	\$975.00
Caddell, Michael	01/07/20	Depositions	Review Kersh correspondence to and from team regarding correspondence to Tamborelli - green card; review Kersh correspondence to Tamborelli regarding green card issue; review Kersh correspondence forwarding the scheduling confirmation from Stratos/Veritext for the CBC depositions next week in Fresno; review Tabor correspondence to and from team forwarding a draft deposition outline for Frank Larsen and some exhibits we might want to use; review Tabor correspondence forwarding Jaffe's comments for Larsen depo outline;	0.6	1075	\$645.00
Chapman, Cynthia	01/07/20	Depositions	Review Kersh correspondence to and from team regarding correspondence to Tamborelli; review Kersh correspondence to Tamborelli; review Kersh correspondence forwarding the scheduling confirmation from Stratos/Veritext for CBC depositions in Fresno; review Tabor correspondence to and from team forwarding a draft deposition outline for Frank Larsen and potential exhibits to use; review Tabor correspondence forwarding Jaffe's comments for Larsen depo outline;	0.5	850	\$425.00
Tabor, Amy	01/07/20	Depositions	Draft F. Larsen deposition outline; assemble exhibits for deposition.	5.0	750	\$3,750.00
Kersh, Kathy	01/07/20	Depositions	Prepare new correspondence to Tamborelli about green card detachment; send new certified mail with depo notices to Tamborelli; emails to attorneys regarding same; forward Stratos confirmation to Caddell; trip to post office to mail same	0.6	325	\$195.00
Caddell, Michael	01/09/20	Depositions	Prepare correspondence to and from Tabor regarding Larsen outline and scheduling telephone conference with Jaffe; prepare correspondence to and from Tabor regarding Kersh sending condensed version of D. Larsen deposition and exhibits; review Kersh correspondence forwarding condensed version of Larsen deposition and exhibits; prepare for depositions;	0.8	1075	\$860.00
Chapman, Cynthia	01/09/20	Depositions	Review Caddell correspondence to and from Tabor regarding Larsen outline and scheduling telephone conference with Jaffe; review Caddell correspondence to and from Tabor regarding Kersh sending condensed version of D. Larsen deposition and exhibits; review Kersh correspondence forwarding condensed version of Larsen deposition and exhibits;	0.3	850	\$255.00
Kersh, Kathy	01/09/20	Depositions	Review Tabor email about sending Larsen depo and exhibits to Caddell; email Larsen depo and exhibits to Caddell	0.2	325	\$65.00
Caddell, Michael	01/10/20	Depositions	Review Sartell correspondence to and from Tabor, and team regarding Kabacinski assisting with any logistical help and regarding preparing updated notice of deposition for F. Larsen; review Kersh correspondence regarding depositions in Fresno;	0.5	1075	\$537.50
Chapman, Cynthia	01/10/20	Depositions	Review Sartell correspondence to and from Tabor, and team regarding Kabacinski assisting with any logistical help and regarding preparing updated notice of deposition for F. Larsen; review Kersh correspondence regarding depositions in Fresno;	0.2	850	\$170.00
Kersh, Kathy	01/10/20	Depositions	Review and respond to emails from co-counsel about deposition; review and respond to email from Marriott	0.3	325	\$97.50
Caddell, Michael	01/11/20	Depositions	Prepare correspondence to Kersh regarding conference room for depositions;	0.1	1075	\$107.50
Chapman, Cynthia	01/11/20	Depositions	Review Caddell correspondence to Kersh regarding conference room for depositions;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	01/13/20	Depositions	Review multiple Tabor correspondence to and from Jaffe regarding scheduling telephone conference; respond; t/conf w/ Tabor, Jaffe; review Tabor correspondence to and from team forwarding draft deposition outline for Leanne Cobb and David Daniel with a few exhibits and scheduled for Wednesday January 15; review Tabor correspondence regarding disclosing Jaffee attendance at Larsen Deposition and forwarding Jaffe signed retainer agreement; respond; review Tabor correspondence regarding speakerphone for F. Larsen deposition; respond; review Tabor correspondence forwarding Treasury Department FAQ;	1.2	1075	\$1,290.00
Chapman, Cynthia	01/13/20	Depositions	Review multiple Tabor correspondence to and from Jaffe regarding telephone conference; review Caddell response; review Tabor correspondence to and from team forwarding draft deposition outline for Leanne Cobb and David Daniel with exhibits; review Tabor correspondence regarding disclosing Jaffee attendance at Larsen Deposition and forwarding Jaffe signed retainer agreement; review Caddell response; review Tabor correspondence regarding speakerphone for F. Larsen deposition; review Caddell response; review Tabor correspondence forwarding Treasury Department FAQ;	0.3	850	\$255.00
Tabor, Amy	01/13/20	Depositions	Draft outline for Cobb and Daniel depositions; assemble deposition exhibits; teleconference with Michael Caddell and Jonathan Jaffe regarding deposition preparation.	4.0	750	\$3,000.00
Kersh, Kathy	01/13/20	Depositions	Telephone call with Tabor about speakerphone; contact Jasso and Stratos regarding speakerphone	0.2	325	\$65.00
Caddell, Michael	01/14/20	Depositions	Review Kersh correspondence to and from team regarding telephone conference with Rebecca Dominguez regarding speakerphones; respond; review Jaffe correspondence to and from Tabor regarding call in and start time for Frank Larsen deposition; review Tamborelli correspondence to and from team regarding the two other employees available right after Larsen deposition; prepare for deposition and travel to Fresno; confs w/ Chapman;	8.5	1075	\$9,137.50
Chapman, Cynthia	01/14/20	Depositions	Review Kersh correspondence to and from team regarding telephone conference with Rebecca Dominguez regarding speakerphones; review Caddell response; review Jaffe correspondence to and from Tabor regarding for Larsen deposition; review Tamborelli correspondence to and from team regarding the two other employees available right after Larsen deposition; prepare for deposition and travel to Fresno; confs with Caddell;	1.0	850	\$850.00
Kersh, Kathy	01/14/20	Depositions	Telephone call with sconet about speakerphone; conference with Labbe about FedExing speakerphone; email to Caddell about speakerphone; review response	0.4	325	\$130.00
Caddell, Michael	01/15/20	Depositions	Prepare for and take depositions of Larsen, et al.; review Jaffe correspondence regarding Larsen deposition; review multiple Jaffe correspondence regarding Larsen; respond; review multiple Jaffe correspondence regarding follow up questions for Larsen; return to Carmel; t/conf w/ Tabor, Jaffe; confs w/ Chapman;	10.8	1075	\$11,610.00
Chapman, Cynthia	01/15/20	Depositions	Review Jaffe correspondence regarding dialed in and on for Larsen deposition; review multiple Jaffe correspondence regarding Larsen; review Caddell response; review multiple Jaffe correspondence regarding follow up questions for Larsen; confs with Caddell;	1.2	850	\$1,020.00
Kersh, Kathy	01/15/20	Depositions	Review invoice from Marriott and enter amount on MC monthly record.	0.2	325	\$65.00
Caddell, Michael	01/16/20	Depositions	Review Jaffe correspondence regarding Larsen deposition follow up; review Tabor correspondence to and from Kersh forwarding draft set of requests for production with Jaffe's suggested requests; respond; review Kersh correspondence to and from Tamborelli, and team forwarding Plaintiff's Third Set of Requests for Production;	0.8	1075	\$860.00
Chapman, Cynthia	01/16/20	Depositions	Review Jaffe correspondence regarding Larsen deposition follow up; review Tabor correspondence to and from Kersh forwarding draft set of requests for production with Jaffe's suggested requests; review Caddell response; review Kersh correspondence to and from Tamborelli, and team forwarding Plaintiff's Third Set of Requests for Production;	0.7	850	\$595.00
Tabor, Amy	01/16/20	Written Discovery	Draft and serve third set of requests for production.	3.0	750	\$2,250.00
Kersh, Kathy	01/16/20	Written Discovery	Review email from Tabor about 3rd RFPD; revise same; respond to email; pdf RFPD; prepare correspondence to opposing counsel and serve RFPD by email and Certified Mail; email to cocounsel regarding discovery requests; download discovery requests to file	1.0	325	\$325.00
Caddell, Michael	01/17/20	Written Discovery	Review multiple Tabor correspondence to regarding the Class Cert Discovery deadline is next Tuesday, January 21st and regarding preparing motion to extend the discovery period; prepare multiple responses;	0.5	1075	\$537.50
Chapman, Cynthia	01/17/20	Written Discovery	Review multiple Tabor correspondence regarding Class Cert Discovery deadlines preparing motion to extend the discovery period; review multiple Caddell responses;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	01/20/20	Depositions	Review Tabor correspondence to and from Kersh regarding contacting Veritex regarding rough draft transcript of Larsen deposition; review Tabor correspondence to team regarding Jaffe agrees that 30 days should be enough to meet and confer and give CBC time to complete the production and forwarding draft stipulation;	0.3	1075	\$322.50
Chapman, Cynthia	01/20/20	Depositions	Review Tabor correspondence to and from Kersh regarding contacting Veritex regarding rough draft transcript of Larsen deposition; review Tabor correspondence to team regarding Jaffe agrees that 30 days should be enough to meet and confer and give CBC time to complete the production and forwarding draft stipulation;	0.2	850	\$170.00
Tabor, Amy	01/20/20	Motion Practice	Left voicemail for opposing counsel regarding stipulation to extend deadlines; draft stipulation to extend deadlines.	3.0	750	\$2,250.00
Caddell, Michael	01/21/20	Written Discovery	Review Sartell correspondence to and from Tabor regarding draft stipulation and offering assistance; respond; review Tabor correspondence to and from Tamborelli and team regarding leaving voicemail regarding extending the class cert discovery period and forwarding draft stipulation; review Sartell correspondence to and from team regarding drafting motion to extend the schedule; review Tabor correspondence to and from Kersh and team regarding getting the rough transcript; respond; review Sartell correspondence to and from Tabor and team forwarding draft declaration of Sartell and draft motion to extend case management deadlines; review Tabor correspondence to and from team forwarding draft filing complete with a Declaration from Caddell; prepare multiple responses; review and revise declaration;	1.1	1075	\$1,182.50
Chapman, Cynthia	01/21/20	Written Discovery	Review Sartell correspondence to and from Tabor regarding draft stipulation and offering assistance; review Caddell response; review Tabor correspondence to and from Tamborelli and team regarding leaving voicemail regarding extending the class cert discovery period and forwarding draft stipulation; review Sartell correspondence to and from team regarding drafting motion to extend the schedule; review Tabor correspondence to and from Kersh and team regarding getting the rough transcript; review Caddell response; review Sartell correspondence to and from Tabor and team forwarding draft declaration of Sartell and draft motion to extend case management deadlines; review Tabor correspondence to and from team forwarding draft filing complete with a Declaration from Caddell; review multiple Caddell responses;	0.5	850	\$425.00
Tabor, Amy	01/21/20	Motion Practice	Draft motion to extend case mangagement schedule with supporting declaration and proposed order.	6.5	750	\$4,875.00
Caddell, Michael	01/22/20	Depositions	Review Francis correspondence to and from team regarding stipulation; review Sartell correspondence to and from Tabor and team regarding stipulation and forwarding draft motion to extend deadlines, proposed order and Caddell declaration; review Tabor correspondence to and from Sartell and team regarding revised stipulation and regarding Kersh checking on status of the rough transcript and forwarding stipulation documents; prepare multiple responses; review Kersh correspondence to and from team regarding status of rough transcript;	1.0	1075	\$1,075.00
Chapman, Cynthia	01/22/20	Depositions	Review Francis correspondence to and from team regarding stipulation; review Sartell correspondence to and from Tabor and team regarding stipulation and forwarding draft motion to extend deadlines, proposed order and Caddell declaration; review Tabor correspondence to and from Sartell and team regarding revised stipulation and regarding Kersh checking on status of the rough transcript and forwarding stipulation documents; review multiple Caddell responses; review Kersh correspondence to and from team regarding status of rough transcript;	0.4	850	\$340.00
Tabor, Amy	01/22/20	Motion Practice	Revise motion to extend class certification deadline.	2.0	750	\$1,500.00
Kersh, Kathy	01/22/20	Depositions	Review email from Tabor; contact Veritext regarding status of Larsen transcript; review response; respond to Tabor	0.3	325	\$97.50
Caddell, Michael	01/23/20	Depositions	Review Tabor correspondence to and from Sartell and team regarding Kathy reports that she has still not been able to get an ETA from Veritext for the rough transcript; respond; review Kersh correspondence to and from team regarding telephone conference with Veritext; respond; review Veritext correspondence forwarding rough draft of David Daniel, Frank Larsen and Leanne Cobb; prepare correspondence to and from Kersh and team forwarding same;	0.6	1075	\$645.00
Chapman, Cynthia	01/23/20	Depositions	Review Tabor correspondence to and from Sartell and team regarding request to Veritext for rough transcript; review Caddell response; review Kersh correspondence to and from team regarding telephone conference with Veritext; review Caddell response; review Veritext correspondence forwarding rough draft of David Daniel, Frank Larsen and Leanne Cobb; review Caddell correspondence to and from Kersh and team forwarding same;	0.4	850	\$340.00
Tabor, Amy	01/23/20	Depositions	Review Larsen depostion transcript.	3.0	750	\$2,250.00
Kersh, Kathy	01/23/20	Depositions	Emails to Veritext; telephone call to Veritext re: status of larsen depo; review and respond to attorney emails.	0.3	325	\$97.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	01/24/20	Depositions	Review Kersh correspondence regarding rough drafts of deposition transcripts of Daniel, Larsen and Cobb; review Tabor correspondence to and from Sartell and team forwarding Larsen rough draft transcript and revised draft motion with references to Larsen testimony; respond; review Tabor correspondence to and from team forwarding near-final versions of today's filings; review and revise same; review and revise same; review Motion for Extension of Case Management Schedule by Sung Gon Kang, Motion Hearing set for 2/24/2020 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii; review Kersh correspondence forwarding courtesy copy of the proposed order to Judge Ishii;	0.7	1075	\$752.50
Chapman, Cynthia	01/24/20	Depositions	Review Kersh correspondence regarding rough drafts of deposition transcripts of Daniel, Larsen and Cobb; review Tabor correspondence to and from Sartell and team forwarding Larsen rough draft transcript and revised draft motion with references to Larsen testimony; review Caddell response; review Tabor correspondence to and from team forwarding near-final versions of today's filings; review Motion for Extension of Case Management Schedule; review Kersh correspondence forwarding courtesy copy of the proposed order to Judge Ishii;	0.6	850	\$510.00
Tabor, Amy	01/24/20	Motion Practice	Revise and file motion to extend schedule.	3.5	750	\$2,625.00
Kersh, Kathy	01/24/20	Pleadings and Service	Review and pdf motion for case management deadline extension and attachments; e-file same; prepare judge's copy and correspondence; trip to Fed Ex to drop off judge's copy; download file-stamped copies to network; email proposed order in Word to Judge Ishii	1.3	325	\$422.50
Caddell, Michael	01/27/20	Written Discovery	Review Sartell correspondence to and from Kersh and team regarding Larsen rough deposition transcript; review Minute Order-Text Entry Only-the Court is in receipt of Plaintiff's third ex parte motion for extension of case management schedule, seeking to enlarge the class certification discovery deadline and related case management deadlines by 30 days following the magistrate judge's resolution of the parties anticipated discovery dispute. (Doc. [52].) Given that the deadline for class certification discovery has passed and other deadlines are impending, the Court hereby VACATES pursuant to this Court's Local Rule 230(g) the hearing on the ex parte motion set for February 24, 2020, and orders Defendant to file an opposition, or statement of non-opposition, to the ex parte motion by no later than February 3, 2020. The Court will issue its ruling on the papers as soon as is practicable after that date. Minute Order signed by Magistrate Judge Sheila K. Oberto on 1/27/2020; review Sartell correspondence to and from Tamborelli and team regarding providing our respective discovery dispute position papers to Magistrate Judge Oberto on that date; review Sartell correspondence to and from Tabor and team regarding scheduling telephone conference regarding scope of M&C letter and the instant dispute; review Sartell correspondence to and from Tamborelli and team regarding going back to Judge Oberto because we understand from your email of Jan. 22, attached, that Defendant is not willing to meet and confer regarding the production of the electronically stored information sought by Plaintiff's Interrogatories Nos. 5-6 and Request for Production No. 7 per her Order of December 19. ECF No. 51 at 2; review Tabor correspondence to and from Sartell and team forwarding a draft meet and confer letter;	1.0	1075	\$1,075.00
Chapman, Cynthia	01/27/20	Written Discovery	Review Sartell correspondence to and from Kersh and team regarding Larsen rough deposition transcript; review Minute Order regarding Plaintiff's third ex parte motion for extension of case management schedule; review Sartell correspondence to and from Tamborelli and team regarding providing discovery dispute position papers to Magistrate Judge Oberto; review Sartell correspondence to and from Tabor and team regarding scheduling telephone conference regarding scope of meet and confer letter; review Sartell correspondence to and from Tamborelli and team regarding discovery dispute; review Tabor correspondence to and from Sartell and team forwarding a draft meet and confer letter;	0.8	850	\$680.00
Tabor, Amy	01/27/20	Motion Practice	Teleconference with Jonathan Jaffe regarding production protocol; draft meet and confer letter to John Tamborelli regarding production protocol.	5.0	750	\$3,750.00
Kersh, Kathy	01/27/20	Pleadings and Service	Save scan to network, forward scan of courtesy copy to attorneys; review and print order from court	0.2	325	\$65.00
Caddell, Michael	01/28/20	Written Discovery	Review Sartell correspondence to and from Tabor and team forwarding redlined revisions to M&C correspondence to Tamborelli regarding data; review Tamborelli correspondence to and from Sartell and team data production, regarding scheduling meet and confer and forwarding M&C correspondence regarding data production; review Tabor correspondence to and from Sartell and team forwarding draft discovery requests based on questions Jonathan Jaffe raised after reviewing the Rough ASCII of Frank Larsen's deposition; review and respond;	0.6	1075	\$645.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	01/28/20	Written Discovery	Review Sartell correspondence to and from Tabor and team forwarding redlined revisions to meet and confer correspondence to Tamborelli regarding data; review Tamborelli correspondence to and from Sartell and team data production, regarding scheduling meet and confer and forwarding meet and confer correspondence regarding data production; review Tabor correspondence to and from Sartell and team forwarding draft discovery requests based on questions Jonathan Jaffe raised after reviewing the Rough ASCII of Frank Larsen's deposition; review Caddell response;	0.4	850	\$340.00
Tabor, Amy	01/28/20	Written Discovery	Teleconference with Jordan Sartell regarding meet and confer with opposing counsel; review correspondence with Jonathan Jaffe; draft Requests for Production; draft Interrogatories.	3.0	750	\$2,250.00
Caddell, Michael	01/29/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding obtaining transcript and will respond in writing to letter by close of business tomorrow; prepare correspondence to and from Tabor and team regarding serving draft discovery requests based on questions Jonathan Jaffe raised after reviewing the Rough ASCII of Frank Larsen's deposition;	0.4	1075	\$430.00
Chapman, Cynthia	01/29/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding obtaining transcript; review Caddell correspondence to and from Tabor and team regarding serving draft discovery requests based on questions Jonathan Jaffe raised after reviewing the Rough ASCII of Frank Larsen's deposition;	0.1	850	\$85.00
Caddell, Michael	01/30/20	Written Discovery	Review Kersh correspondence to and from Tamborelli and team forwarding of Plaintiff's Fourth Set of Requests for Production and Second Set of Interrogatories to defendant Credit Bureau Connection, Inc; review Tamborelli correspondence to Sartell and team forwarding CBC response to January 28 meet and confer; review Soumilas correspondence to team regarding things left to do/strategy;	0.3	1075	\$322.50
Chapman, Cynthia	01/30/20	Written Discovery	Review Kersh correspondence to and from Tamborelli and team forwarding Plaintiff's Fourth Set of Requests for Production and Second Set of Interrogatories; review Tamborelli correspondence to Sartell and team forwarding CBC response to January 28 meet and confer; review Soumilas correspondence to team regarding strategy;	0.3	850	\$255.00
Tabor, Amy	01/30/20	Motion Practice	Attention to firm website; prepare CLE presentation.	2.0	750	\$1,500.00
Tabor, Amy	01/30/20	Written Discovery	Finalize and serve requests for production and interrogatories.	0.1	750	\$75.00
Kersh, Kathy	01/30/20	Written Discovery	Review email from Tabor; revise dates on discovery requests; scan documents to network; serve copies by email on tamborelli; prepare correspondence to Tamborelli	1.0	325	\$325.00
Caddell, Michael	01/31/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding scheduling telephone conference today; t/conf w/ Tamborelli, et al.;	1.2	1075	\$1,290.00
Chapman, Cynthia	01/31/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding scheduling telephone conference today;	0.1	850	\$85.00
Tabor, Amy	01/31/20	Motion Practice	Review meet and confer letter from John Tamborelli; review email correspondence regarding scheduling telephonic meet and confer.	0.1	750	\$75.00
Caddell, Michael	02/03/20	Written Discovery	Review Sartell correspondence to and from Tabor and team Tamborelli correspondence regarding CBC response to January 28 meet and confer and regarding asking Jaffe to review Defendant's opposition to the specific steps we proposed; review Tamborelli correspondence to Court and team forwarding CBC opposition to Kang Ex Parte with two exhibits;	0.4	1075	\$430.00
Chapman, Cynthia	02/03/20	Written Discovery	Review Sartell correspondence to and from Tabor and team Tamborelli correspondence regarding CBC response to January 28 meet and confer and regarding asking Jaffe to review Defendant's opposition to the specific steps we proposed; review Tamborelli correspondence to Court and team forwarding CBC opposition to Kang Ex Parte with two exhibits;	0.3	850	\$255.00
Tabor, Amy	02/03/20	Motion Practice	Correspond via email with Jordan Sartell and Jonathan Jaffe regarding electronic discovery meet and confer.	0.1	750	\$75.00
Caddell, Michael	02/04/20	Written Discovery	Review notice from Veritext regarding deposition files available; review Kersh correspondence to and from team forwarding Frank Larsen and Leanne Cobb transcripts; review Kersh correspondence to and from team regarding XMEF files are the synced video files; review Kersh correspondence to and from team regarding Stratos sent a link to a program that will play XMEF files; review Opposition by Defendant Credit Bureau Connection, Inc. to Minute Order-Terminate Deadlines and Hearings-Order on Motion for Miscellaneous Relief Motion for Extension of Case Management Schedule; review Kersh correspondence forwarding same; review Sartell correspondence to Tamborelli and team regarding that we are at an impasse with respect to our discovery dispute and will require the Court's assistance; prepare correspondence to and from Tabor, Sartell and team regarding highlighting that the story we were told that CBC did not house the OFAC list and simply provided a link to the government site and search algorithm was untrue, so (1) this is clearly CBC's problem and (2) CBC has no credibility; review Tabor correspondence forwarding Jaffe invoice for December and January;	1.4	1075	\$1,505.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	02/04/20	Written Discovery	Review notice from Veritext regarding deposition files available; review Kersh correspondence to and from team forwarding Frank Larsen and Leanne Cobb transcripts; review Kersh correspondence to and from team regarding XMEF files are the synced video files; review Kersh correspondence to and from team regarding; review Opposition by Defendant Credit Bureau Connection, Inc. to Minute Order-Terminate Deadlines and Hearings-Order on Motion for Miscellaneous Relief Motion for Extension of Case Management Schedule; review Kersh correspondence forwarding same; review Sartell correspondence to Tamborelli and team regarding discovery dispute; review Caddell correspondence to and from Tabor, Sartell and team regarding case theme; review Tabor correspondence forwarding Jaffe invoice for December and January;	1.0	850	\$850.00
Tabor, Amy	02/04/20	Motion Practice	Review response to motion for extension of time; review email correspondence with opposing counsel regarding discovery dispute; review correspondence with Jonathan Jaffe regarding protocol for electronic discovery production.	1.0	750	\$750.00
Kersh, Kathy	02/04/20	Depositions	Download and review depo transcripts from Stratos; email to Stratos about XMEF files; review response; download XMEF file reader and load same; view transcript in file reader; email to attorneys regarding video depositions and XMEF file reader.	1.0	325	\$325.00
Caddell, Michael	02/05/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding availability for a meet and confer;	0.3	1075	\$322.50
Chapman, Cynthia	02/05/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding availability for a meet and confer;	0.1	850	\$85.00
Tabor, Amy	02/05/20	Motion Practice	Review email correspondence regarding telephonic meet-and-confer.	0.1	750	\$75.00
Caddell, Michael	02/07/20	Pleadings and Service	Review Sartell correspondence to and from team forwarding draft response to Tamborelli letter; review Sartell correspondence to and from Tamborelli and team regarding Defendant's objections to Plaintiffs' proposals; review Sartell correspondence to and from Tamborelli and team forwarding dial-in information for meet and confer; review Order Granting Third Motion for Extension of Case Management Schedule, Motion Hearing currently set for 04/20/2020 is moved to 8/3/2020 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii, Status Conference currently set for 06/23/2020 is moved to 10/1/2020 at 09:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto signed by Magistrate Judge Sheila K. Oberto on 2/7/2020;	0.4	1075	\$430.00
Chapman, Cynthia	02/07/20	Pleadings and Service	Review Sartell correspondence to and from team forwarding draft response to Tamborelli letter; review Sartell correspondence to and from Tamborelli and team regarding Defendant's objections to Plaintiffs' proposals; review Sartell correspondence to and from Tamborelli and team forwarding dial-in information for meet and confer; review Order Granting Third Motion for Extension of Case Management Schedule;	0.2	850	\$170.00
Tabor, Amy	02/07/20	Motion Practice	Review and comment on draft meet and confer letter; teleconference with Jordan Sartell and John Tamborelli regarding discovery dispute; teleconference with Jordan Sartell regarding discovery dispute.	1.0	750	\$750.00
Caddell, Michael	02/10/20	Depositions	Review Sartell correspondence to and from Tabor and team regarding ECF 55; review Tabor correspondence to and from Sartell and team forwarding Larsen transcript; review Tamborelli correspondence to Sartell and team regarding his clients have not yet completed review of your Friday noon email and regarding will not be having discussion tomorrow;	0.3	1075	\$322.50
Chapman, Cynthia	02/10/20	Depositions	Review Sartell correspondence to and from Tabor and team regarding ECF 55; review Tabor correspondence to and from Sartell and team forwarding Larsen transcript; review Tamborelli correspondence to Sartell and team regarding discovery dispute;	0.2	850	\$170.00
Kersh, Kathy	02/10/20	Pleadings and Service	Update calendar and case management notebook	0.5	325	\$162.50
Caddell, Michael	02/11/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team regarding Canceled Continued M&C regarding Data Proposal;	0.1	1075	\$107.50
Chapman, Cynthia	02/11/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team regarding meet and confer and data proposal;	0.1	850	\$85.00
Caddell, Michael	02/12/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team regarding M&C Continued;	0.1	1075	\$107.50
Chapman, Cynthia	02/12/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team regarding meet and confer;	0.1	850	\$85.00
Kersh, Kathy	02/12/20	Pleadings and Service	Update hard copy file and deposition files; load video depositions onto network and check operation of videos	0.7	325	\$227.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	02/13/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team forwarding CBC response to February 7, 2020 meet and confer; review Sartell correspondence to and from Tamborelli and team regarding reviewed your letter and it seems clear that the parties are at an impasse and will need the Court's assistance and regarding cancelling telephone conference;	0.3	1075	\$322.50
Chapman, Cynthia	02/13/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team forwarding CBC response to February 7, 2020 meet and confer; review Sartell correspondence to and from Tamborelli and team regarding discovery dispute and cancelling telephone conference;	0.2	850	\$170.00
Labbe, Felicia	02/13/20	Depositions	Highlight Frank Larsen deposition and send to Tabor;	1.0	175	\$175.00
Caddell, Michael	02/14/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team regarding cancelled M&C;	0.1	1075	\$107.50
Chapman, Cynthia	02/14/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team regarding cancelled meet and confer;	0.1	850	\$85.00
Caddell, Michael	02/17/20	Pleadings and Service	Review Sartell correspondence to and from team regarding motion for protective order;	0.1	1075	\$107.50
Chapman, Cynthia	02/17/20	Pleadings and Service	Review Sartell correspondence to and from team regarding motion for protective order;	0.1	850	\$85.00
Caddell, Michael	02/18/20	Written Discovery	Review Labbe correspondence forwarding invoice from Veritext; review Sartell correspondence to and from team forwarding draft email to Tamoborelli regarding defendant's motion for a protective order come across last Friday; review multiple Sartell correspondence to and from Tamborelli and team regarding we expected to see defendant's motion for a protective order come across last Friday; review multiple Tamborelli correspondence to and from Sartell and team regarding a protective order filed this week; review Tamborelli correspondence to and from Sartell and team regarding scheduling meet and confer to prepare the joint statement regarding discovery disagreement under local rule 251;	0.6	1075	\$645.00
Chapman, Cynthia	02/18/20	Written Discovery	Review Labbe correspondence forwarding invoice from Veritext; review Sartell correspondence to and from team forwarding draft email to Tamoborelli regarding defendant's motion for a protective order; review multiple Sartell correspondence to and from Tamborelli and team regarding motion for a protective order; review multiple Tamborelli correspondence to and from Sartell and team regarding a protective order filed this week; review Tamborelli correspondence to and from Sartell and team regarding scheduling meet and confer to prepare the joint statement regarding discovery disagreement under local rule 251;	0.6	850	\$510.00
Caddell, Michael	02/19/20	Pleadings and Service	Review Motion for Protective Order by Credit Bureau Connection, Inc.. Motion Hearing set for 3/18/2020 at 09:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	02/19/20	Pleadings and Service	Review Motion for Protective Order by Credit Bureau Connection, Inc.; conf w/ Caddell;	0.5	850	\$425.00
Caddell, Michael	02/20/20	Written Discovery	Review multiple Tabor correspondence to and from Sartell regarding motion for protective order by CBC and regarding getting Jaffe to weigh in on how long writing the decrypting routines would take (if indeed Larsen's estimates are too long), get him to explain his alternative proposal to produce just potential hit records based on running CBC's consumer-report names against the OFAC list using CBC's algorithm, and have him explain how searching/filtering could likely narrow the records to be produced to a not overly broad set; review Tabor correspondence to and from Sartell and team regarding deadline to respond to Tamborelli motion for protective order; review Kersh correspondence to team forwarding copy of Motion for Protective Order with Exhibits;	1.0	1075	\$1,075.00
Chapman, Cynthia	02/20/20	Written Discovery	Review Tabor correspondence to and from Sartell regarding motion for protective order and discovery issues; review Tabor correspondence to and from Sartell and team regarding deadline to respond to Tamborelli motion for protective order; review Kersh correspondence to team forwarding copy of Motion for Protective Order with Exhibits;	0.6	850	\$510.00
Tabor, Amy	02/20/20	Motion Practice	Review motion for protective order; correspond via email with Jordan Sartell regarding response to motion for protective order.	0.5	750	\$375.00
Kersh, Kathy	02/20/20	Pleadings and Service	Download new e-filing from defendant; distribute to attorneys	0.1	325	\$32.50
Caddell, Michael	02/21/20	Pleadings and Service	Review Motion for Protective Order by Credit Bureau Connection, Inc.. Motion Hearing set for 3/18/2020 at 09:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto;	0.1	1075	\$107.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	02/21/20	Pleadings and Service	Review Motion for Protective Order by Credit Bureau Connection, Inc;	0.1	850	\$85.00
Caddell, Michael	02/25/20	Depositions	Review Labbe correspondence forwarding invoice from Veritext;	0.1	1075	\$107.50
Chapman, Cynthia	02/25/20	Depositions	Review Labbe correspondence forwarding invoice from Veritext;	0.1	850	\$85.00
Caddell, Michael	02/26/20	Depositions	Prepare multiple correspondence to and from Labbe and team regarding total fees for depositions, etc.; prepare correspondence to and from Labbe regarding invoices from Veritext; conf w/ Chapman;	0.3	1075	\$322.50
Chapman, Cynthia	02/26/20	Depositions	Review multiple Caddell correspondence to and from Labbe and team regarding total fees for depositions, etc.; review Caddell correspondence to and from Labbe regarding invoices from Veritext; analyss re bills; conf with Caddell;	0.4	850	\$340.00
Kersh, Kathy	03/03/20	Written Discovery	Review discovery sent and deadlines to respond; review Tabor email and respond	0.2	325	\$65.00
Caddell, Michael	03/04/20	Written Discovery	Review Labbe correspondence forwarding invoice from Jaffe; respond; review Opposition by Sung Gon Kang to Motion for Protective Order;	0.4	1075	\$430.00
Chapman, Cynthia	03/04/20	Written Discovery	Review Labbe correspondence forwarding invoice from Jaffe; review Caddell response; review Opposition by Sung Gon Kang to Motion for Protective Order;	0.4	850	\$340.00
Tabor, Amy	03/04/20	Motion Practice	Teleconference with Jordan Sartell regarding motion to compel; teleconference with Jordan Sartell and Jonathan Jaffe regarding motion to compel; review and comment on draft motion papers.	1.5	750	\$1,125.00
Caddell, Michael	03/05/20	Pleadings and Service	Prepare correspondence to and from Tabor and team regarding opposition and regarding attendance at hearing;	0.3	1075	\$322.50
Chapman, Cynthia	03/05/20	Pleadings and Service	Review Caddell correspondence to and from Tabor and team regarding opposition and regarding attendance at hearing;	0.1	850	\$85.00
Caddell, Michael	03/06/20	Pleadings and Service	Review Tabor correspondence to and from team regarding attendance at the hearing and electronic devices; respond;	0.2	1075	\$215.00
Chapman, Cynthia	03/06/20	Pleadings and Service	Review Tabor correspondence to and from team regarding attendance at the hearing and electronic devices; review Caddell response;	0.1	850	\$85.00
Kersh, Kathy	03/06/20	Pleadings and Service	download new filing; review email from Tabor and respond	0.1	325	\$32.50
Caddell, Michael	03/10/20	Pleadings and Service	Review Sartell correspondence to and from team regarding Jeff Kabacinski made inquiries and has learned that Judge Oberto will be reviewing the motion for protective order and will likely be ruling on the papers w/o a hearing and forwarding email regarding same; respond;	0.2	1075	\$215.00
Chapman, Cynthia	03/10/20	Pleadings and Service	Review Sartell correspondence to and from team regarding motion for protective order; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	03/11/20	Pleadings and Service	Review Reply, supporting memorandum, Larsen Declaration, etc., by Credit Bureau Connection, Inc. re Motion for Protective Order;	0.8	1075	\$860.00
Chapman, Cynthia	03/11/20	Pleadings and Service	Review Reply, supporting memorandum, Larsen Declaration, etc., by Credit Bureau Connection, Inc. re Motion for Protective Order;	0.6	850	\$510.00
Caddell, Michael	03/12/20	Pleadings and Service	Review Kersh correspondence to team forwarding three new filings - CBC's reply brief to plaintiffs' opposition to motion for protective order, reply memo in support, supplemental declaration of Larsen, evidentiary objections to plaintiffs' opposition; review Notice of Errata by Credit Bureau Connection, Inc. re [59] Reply;	0.3	1075	\$322.50
Chapman, Cynthia	03/12/20	Pleadings and Service	Review Kersh correspondence to team forwarding CBC's reply brief to plaintiffs' opposition to motion for protective order, reply memo in support, supplemental declaration of Larsen, evidentiary objections to plaintiffs' opposition; review Notice of Errata by Credit Bureau Connection, Inc. re Reply;	0.5	850	\$425.00
Kersh, Kathy	03/12/20	Pleadings and Service	Download new filing to network; forward copies to attorneys	0.2	325	\$65.00
Caddell, Michael	03/14/20	Pleadings and Service	Review Tamborelli correspondence to court clerk regarding upcoming hearing and coronavirus;	0.1	1075	\$107.50
Chapman, Cynthia	03/14/20	Pleadings and Service	Review Tamborelli correspondence to court clerk regarding upcoming hearing;	0.5	850	\$425.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	03/16/20	Pleadings and Service	Review Minute Order: ***Text Entry Only*** The Court has deemed Defendant's motion for protective order, (Doc. [56]), noticed for hearing on March 18, 2020, before Magistrate Judge Sheila K. Oberto, suitable for decision without oral argument. As such, the hearing on the motion is Vacated and the matter will be taken under submission as of that date. Minute Order signed by Magistrate Judge Sheila K. Oberto on 3/16/2020;	0.1	1075	\$107.50
Chapman, Cynthia	03/16/20	Pleadings and Service	Review Minute Order regarding Defendant's motion for protective order;	0.1	850	\$85.00
Caddell, Michael	04/02/20	Written Discovery	Review Labbe correspondence forwarding invoice from Jaffee; respond;	0.2	1075	\$215.00
Chapman, Cynthia	04/02/20	Written Discovery	Review Labbe correspondence forwarding invoice from Jaffee; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	04/05/20	Written Discovery	Prepare correspondence to Labbe and team regarding invoice from Jaffe;	0.1	1075	\$107.50
Chapman, Cynthia	04/05/20	Written Discovery	Review Caddell correspondence to Labbe and team regarding invoice from Jaffe;	0.1	850	\$85.00
Caddell, Michael	04/07/20	Pleadings and Service	Review Order Denying Defendant's Motion for Protective Order - Motion for Class Certification set for February 1, 2021 at 1:30pm; prepare correspondence to and from team regarding same; review Chapman response; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	04/07/20	Pleadings and Service	Review Order Denying Defendant's Motion for Protective; review Caddell correspondence to and from team regarding same; prepare response; conf w/ Caddell;	0.5	850	\$425.00
Tabor, Amy	04/07/20	Motion Practice	Review order denying motion for protective order; correspond via email with co-counsel regarding discovery next steps.	0.5	750	\$375.00
Caddell, Michael	04/08/20	Pleadings and Service	Review Sartell correspondence to and from team regarding Magistrate Oberto opinion; review Sartell correspondence to and from team regarding revised stipulated proposed protective order that covers the information described by the Court on page 13 of Oberto Order and forwarding revised proposed stipulated protective order;	0.4	1075	\$430.00
Chapman, Cynthia	04/08/20	Pleadings and Service	Review Sartell correspondence to and from team regarding Magistrate Oberto opinion; review Sartell correspondence to and from team regarding revised stipulated proposed protective order and forwarding revised proposed stipulated protective order;	0.1	850	\$85.00
Caddell, Michael	04/10/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding follow-up on revised proposed stipulated protective order and forwarding same;	0.3	1075	\$322.50
Chapman, Cynthia	04/10/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding follow-up on revised proposed stipulated protective order and forwarding same;	0.2	850	\$170.00
Caddell, Michael	04/13/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding revised proposed stipulated protective order and regarding scheduling telephone conference;	0.2	1075	\$215.00
Chapman, Cynthia	04/13/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding revised proposed stipulated protective order and regarding scheduling telephone conference;	0.1	850	\$85.00
Caddell, Michael	04/14/20	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team regarding revised proposed stipulated protective order; respond; review Stipulation and Proposed Order for Protective Order (Revised) re [46] Stipulation and Proposed Order by Sung Gon Kang; review Sartell correspondence to Judge Oberto forwarding parties' revised proposed stipulated protective order, which was filed today as ECF 64, in Word format;	0.5	1075	\$537.50
Chapman, Cynthia	04/14/20	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team regarding revised proposed stipulated protective order; review Caddell response; review Stipulation and Proposed Order for Protective Order; review Sartell correspondence to Judge Oberto forwarding parties' revised proposed stipulated protective order;	0.2	850	\$170.00
Caddell, Michael	04/15/20	Pleadings and Service	Review Sartell correspondence to and from Tabor and team regarding next steps and reaching out to Tamborelli to schedule M&C;	0.3	1075	\$322.50
Chapman, Cynthia	04/15/20	Pleadings and Service	Review Sartell correspondence to and from Tabor and team regarding next steps and reaching out to Tamborelli to schedule meet and confer;	0.2	850	\$170.00
Caddell, Michael	04/20/20	Written Discovery	Review Revised Stipulated Protective Order; review Sartell correspondence to Tamborelli and team forwarding discovery correspondence and regarding scheduling telephone conference;	0.2	1075	\$215.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	04/20/20	Written Discovery	Review Revised Stipulated Protective Order; review Sartell correspondence to Tamborelli and team forwarding discovery correspondence and regarding scheduling telephone conference;	0.2	850	\$170.00
Caddell, Michael	04/21/20	Pleadings and Service	Review Motion for Reconsideration by Credit Bureau Connection, Inc.; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	04/21/20	Pleadings and Service	Review Motion for Reconsideration by Credit Bureau Connection, Inc.; conf w/ Caddell;	0.5	850	\$425.00
Kersh, Kathy	04/21/20	Pleadings and Service	Download new filings to network; download updated docket sheet	0.4	325	\$130.00
Kersh, Kathy	04/22/20	Pleadings and Service	Review Tabor email about motion filed by CBC; review local rules and respond	0.2	325	\$65.00
Caddell, Michael	04/23/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding following up on the discovery correspondence and regarding scheduling telephone conference;	0.2	1075	\$215.00
Chapman, Cynthia	04/23/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding following up on the discovery correspondence and regarding scheduling telephone conference;	0.2	850	\$170.00
Caddell, Michael	04/24/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding scheduling telephone conference on Monday at 11am PST;	0.2	1075	\$215.00
Chapman, Cynthia	04/24/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding scheduling telephone conference;	0.1	850	\$85.00
Caddell, Michael	04/27/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding discovery correspondence and regarding scheduling telephone conference; review Sartell correspondence to and from Tamborelli and team forwarding dial-in information for telephone conference; review Sartell correspondence to and from Tamborelli and team regarding discovery conference follow up and regarding scheduling telephone conference on Wednesday; review Sartell correspondence to and from Tamborelli and team forwarding dial-in information for telephone conference;	0.4	1075	\$430.00
Chapman, Cynthia	04/27/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding discovery correspondence and regarding scheduling telephone conference; review Sartell correspondence to and from Tamborelli and team forwarding dial-in information for telephone conference; review Sartell correspondence to and from Tamborelli and team regarding discovery conference follow up and regarding scheduling telephone conference on Wednesday; review Sartell correspondence to and from Tamborelli and team forwarding dial-in information for telephone conference;	0.2	850	\$170.00
Tabor, Amy	04/27/20	Motion Practice	Teleconference with Jordan Sartell regarding discovery issues; teleconference with opposing counsel regarding discovery issues; teleconference with Jordan Sartell regarding response to motion for reconsideration; outline response to motion for reconsideration.	3.0	750	\$2,250.00
Caddell, Michael	04/28/20	Pleadings and Service	Review Tamborelli correspondence to Sartell and team regarding rescheduling meeting to Thursday or Friday; review Opposition by Sung Gon Kang to Motion for Reconsideration;	0.3	1075	\$322.50
Chapman, Cynthia	04/28/20	Pleadings and Service	Review Tamborelli correspondence to Sartell and team regarding rescheduling meeting to Thursday or Friday; review Opposition by Sung Gon Kang to Motion for Reconsideration;	0.2	850	\$170.00
Tabor, Amy	04/28/20	Motion Practice	Draft insert for response to motion for reconsideration; review and comment on response to motion for reconsideration.	4.0	750	\$3,000.00
Kersh, Kathy	04/28/20	Pleadings and Service	Review email from Tabor and upload documents to Dropbox.	0.1	325	\$32.50
Caddell, Michael	04/29/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding rescheduling telephone conference to Friday; review Sartell correspondence to and from Tamborelli and team forwarding dial-in number for telephone conference;	0.2	1075	\$215.00
Chapman, Cynthia	04/29/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding rescheduling telephone conference to Friday; review Sartell correspondence to and from Tamborelli and team forwarding dial-in number for telephone conference;	0.2	850	\$170.00
Caddell, Michael	05/01/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding discovery conference follow up and regarding CBC standing on its objections and regarding scheduling telephone conference to discuss further; review multiple Sartell correspondence to and from Kusamura, Tamborelli and team regarding the parties have reached an impasse with respect to a discovery dispute and would like to request a telephonic conference with Judge Oberto to resolve same; review	0.4	1075	\$430.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	05/01/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding discovery conference follow up, CBC objections, and scheduling telephone conference to discuss further; review multiple Sartell correspondence to and from Kusamura, Tamborelli and team regarding discovery dispute and a telephonic conference with Judge Oberto;	0.2	850	\$170.00
Kersh, Kathy	05/01/20	Written Discovery	Review email from Tabor and upload discovery letter to network	0.1	325	\$32.50
Caddell, Michael	05/06/20	Written Discovery	Review Tamborelli correspondence to and from Kusamura, Sartell and team forwarding CBC letter brief regarding final CBC informal discovery dispute conference; review Sartell correspondence to Judge Oberto, Tamborelli and team forwarding Plaintiff's discovery dispute summary and exhibits;	0.6	1075	\$645.00
Chapman, Cynthia	05/06/20	Written Discovery	Review Tamborelli correspondence to and from Kusamura, Sartell and team forwarding CBC letter brief regarding final CBC informal discovery dispute conference; review Sartell correspondence to Judge Oberto, Tamborelli and team forwarding Plaintiff's discovery dispute summary and exhibits;	0.3	850	\$255.00
Tabor, Amy	05/06/20	Motion Practice	Review and comment on draft letter brief to Magistrate Judge Oberto regarding discovery dispute; review CBC letter brief.	1.0	750	\$750.00
Caddell, Michael	05/07/20	Written Discovery	Review Minute order: ***text entry only*** The Court is in receipt of the parties' request for an informal discovery dispute conference and the parties' summaries of the dispute, a telephonic discovery dispute conference is set for May 14, 2020, at 2:00 PM before Magistrate Judge Sheila K. Oberto, the parties shall call (888) 557-8511, access code 6208204 at the scheduled time, Minute Order signed by Magistrate Judge Sheila K. Oberto on 5/7/2020;	0.1	1075	\$107.50
Chapman, Cynthia	05/07/20	Written Discovery	Review Minute order regarding informal discovery dispute conference;	0.1	850	\$85.00
Caddell, Michael	05/14/20	Written Discovery	Review multiple Tabor correspondence to and from Sartell regarding discovery dispute conference calendared for today, who is handling the argument for our side and should we have a call in advance to discuss; t/conf w/ Court, et al.; review Minutes Text Only for proceedings held telephonically before Magistrate Judge Sheila K. Oberto regarding Informal Discovery Dispute Conference held on 5/14/2020, court order to follow, Plaintiffs Counsel Mike Caddell, Jordan Sartel & Amy Tabor present and Defendants Counsel John Tamborelli present; review Order regarding Discovery Dispute; review Soumilas correspondence to team regarding order; conf w/ Chapman;	1.1	1075	\$1,182.50
Chapman, Cynthia	05/14/20	Written Discovery	Review multiple Tabor correspondence to and from Sartell regarding discovery dispute conference; review Minutes Order regarding Informal Discovery; review Order regarding Discovery Dispute; review Soumilas correspondence to team regarding order; conf w/ Caddell;	0.7	850	\$595.00
Tabor, Amy	05/14/20	Motion Practice	Prepare for discovery hearing; teleconference with Jordan Sartell regarding preparation for discovery hearing; attend telephonic discovery hearing; review order granting motion to compel.	3.0	750	\$2,250.00
Caddell, Michael	05/15/20	Written Discovery	Review Sartell correspondence to and from Soumilas and team regarding the discovery order;	0.5	1075	\$537.50
Chapman, Cynthia	05/15/20	Written Discovery	Review Sartell correspondence to and from Soumilas and team regarding the discovery order;	0.2	850	\$170.00
Kersh, Kathy	05/15/20	Pleadings and Service	Update case management notebook; review revised stipulated protective order	0.5	325	\$162.50
Caddell, Michael	05/18/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team forwarding draft amended stipulated protective order;	0.3	1075	\$322.50
Chapman, Cynthia	05/18/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team forwarding draft amended stipulated protective order;	0.2	850	\$170.00
Caddell, Michael	05/19/20	Written Discovery	Review Order Denying Defendant's Objections to Magistrate Judge's Discovery Order signed by District Judge Anthony Ishii on 05/25/20 and it is hereby ordered that Defendant's Objections Doc No 66 to the Magistrate Judge's Discovery Order are Denied; prepare correspondence to and from team regarding same;	0.3	1075	\$322.50
Chapman, Cynthia	05/19/20	Written Discovery	Review Order Denying Defendant's Objections to Magistrate Judge's Discovery Order signed by District Judge Anthony Ishii on 05/25/20; review Caddell correspondence to and from team regarding same;	0.2	850	\$170.00
Caddell, Michael	05/20/20	Pleadings and Service	Review Sartell correspondence to and from team regarding counsel; review Tamborelli correspondence to and from Sartell and team forwarding revised amended stipulated protective order;	0.2	1075	\$215.00
Chapman, Cynthia	05/20/20	Pleadings and Service	Review Sartell correspondence to and from team regarding counsel; review Tamborelli correspondence to and from Sartell and team forwarding revised amended stipulated protective order;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	05/21/20	Pleadings and Service	Review Stipulation and Proposed Order for Amended Protective Order regarding Protective Order by Sung Gon Kang; review Sartell correspondence to Judge Oberto forwarding Word Version of the parties proposed amended stipulated protective order; review Sartell correspondence to and from Tamborelli and team forwarding revisions to revised amended stipulated protective order;	0.2	1075	\$215.00
Chapman, Cynthia	05/21/20	Pleadings and Service	Review Stipulation and Proposed Order for Amended Protective Order regarding Protective Order; review Sartell correspondence to Judge Oberto forwarding proposed amended stipulated protective order; review Sartell correspondence to and from Tamborelli and team forwarding revisions to revised amended stipulated protective order;	0.2	850	\$170.00
Kersh, Kathy	05/21/20	Pleadings and Service	Review and download new filing to network; forward copy to attorneys	0.1	325	\$32.50
Caddell, Michael	05/22/20	Pleadings and Service	Review Amended Stipulated Protective Order;	0.2	1075	\$215.00
Chapman, Cynthia	05/22/20	Pleadings and Service	Review Amended Stipulated Protective Order;	0.1	850	\$85.00
Kersh, Kathy	05/22/20	Pleadings and Service	Download new filings to network; review amended protective order; update case management notebook	0.4	325	\$130.00
Caddell, Michael	05/29/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding CBC will need to next Wednesday to provide the information regarding the judges recent ruling;	0.5	1075	\$537.50
Chapman, Cynthia	05/29/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding CBC will need to next Wednesday to provide the information regarding the judges recent ruling;	0.1	850	\$85.00
Kersh, Kathy	06/01/20	Pleadings and Service	Review and download redacted copies of new filings; email to Tabor regarding unredacted copies; review response; download unredacted copies to network	0.3	325	\$97.50
Caddell, Michael	06/03/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding please confirm that CBC will produce the compelled information today;	0.3	1075	\$322.50
Chapman, Cynthia	06/03/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding CBC producing compelled information today;	0.2	850	\$170.00
Caddell, Michael	06/04/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding CBC will produce the compelled information by Noon PST today; review Tamborelli correspondence to and from Sartell and team forwarding CBC discovery response per court order re OFAC and Maria DB and password to access documents;	0.2	1075	\$215.00
Chapman, Cynthia	06/04/20	Written Discovery	Review Tamborelli correspondence to and from Sartell and team regarding CBC producing compelled information by Noon PST today; review Tamborelli correspondence to and from Sartell and team forwarding CBC discovery response per court order;	0.2	850	\$170.00
Tabor, Amy	06/04/20	Written Discovery	Review production received from defendant; correspond via email with Jordan Sartell regarding production and consultation with expert.	0.5	750	\$375.00
Kersh, Kathy	06/04/20	Pleadings and Service	Review Tabor email; download Schema_code file to network; open document	0.4	325	\$130.00
Tabor, Amy	06/05/20	Motion Practice	Correspond via email with Devin Fok regarding potential new matter against First Advantage; review complaint in related case against First Advantage.	1.5	750	\$1,125.00
Tabor, Amy	06/05/20	Written Discovery	Prepare email to Jonathan Jaffe regarding discovery rulings and next steps.	0.2	750	\$150.00
Tabor, Amy	06/08/20	Written Discovery	Correspond via email with Jonathan Jaffee regarding conference scheduling.	0.1	750	\$75.00
Tabor, Amy	06/12/20	Written Discovery	Review comments on php program received from Jonathan Jaffe.	1.5	750	\$1,125.00
Tabor, Amy	06/16/20	Written Discovery	Review annotated markup of CVC OFAC matching code.	2.0	750	\$1,500.00
Caddell, Michael	06/22/20	Pleadings and Service	Prepare correspondence to and from Tabor regarding status conference;	0.8	1075	\$860.00
Chapman, Cynthia	06/22/20	Pleadings and Service	Review Caddell correspondence to and from Tabor regarding status conference;	0.1	850	\$85.00
Kersh, Kathy	06/22/20	Pleadings and Service	Review docket sheet; download updated docket sheet	0.2	325	\$65.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	07/02/20	Written Discovery	Review Labbe correspondence to and from team forwarding Jaffe invoice; respond;	0.4	1075	\$430.00
Chapman, Cynthia	07/02/20	Written Discovery	Review Labbe correspondence to and from team forwarding Jaffe invoice; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	07/08/20	Pre-suit Investigation	Revise draft second amended complaint; revise draft status report; prepare email to co-counsel regarding draft status report and second amended complaint.	6.0	750	\$4,500.00
Caddell, Michael	07/09/20	Written Discovery	Review Tabor correspondence to and from Sartell, Kersh regarding Defendant's Second Set of Discovery Requests; review Sartell correspondence to and from Tabor and team regarding filing a motion for protective order and forwarding same; respond; review Motion for Protective Order, Motion Hearing set for 8/3/2020 at 01:30 PM in Courtroom 2; conf w/ Chapman;	0.8	1075	\$860.00
Chapman, Cynthia	07/09/20	Written Discovery	Review Tabor correspondence to and from Sartell, Kersh regarding Defendant's Second Set of Discovery Requests; review Sartell correspondence to and from Tabor and team regarding filing a motion for protective order and forwarding same; review Caddell response; review Motion for Protective Order; conf with Caddell;	0.5	850	\$425.00
Tabor, Amy	07/09/20	Motion Practice	Teleconference with Jordan Sartell regarding discovery responses; review and comment on draft discovery responses.	1.5	750	\$1,125.00
Tabor, Amy	07/09/20	Written Discovery	Multiple telephone conferences with Jordan Sartell regarding responses to discovery; review and comment on draft discovery responses; review email correspondence from John Tamborelli regarding discovery responses; correspond via email with Kathy Kersh and Michael Caddell regarding receipt of discovery requests.	2.5	750	\$1,875.00
Kersh, Kathy	07/09/20	Written Discovery	Review Tabor email about June 2 discovery requests; search files online and in file cabinet; respond to Tabor email	0.3	325	\$97.50
Caddell, Michael	07/10/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team forwarding Plaintiff's objections and responses to Defendant's second set of discovery requests;	0.4	1075	\$430.00
Chapman, Cynthia	07/10/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team forwarding Plaintiff's objections and responses to Defendant's second set of discovery requests;	0.2	850	\$170.00
Kersh, Kathy	07/10/20	Written Discovery	Download discovery responses to network; review email from cocounsel	0.2	325	\$65.00
Caddell, Michael	07/13/20	Pleadings and Service	Review Minute Order regarding the Motion for Protective Order current set for 08/03/2020 is reset for 08/05/2020 at 9:30 am;	0.1	1075	\$107.50
Chapman, Cynthia	07/13/20	Pleadings and Service	Review Minute Order regarding the Motion for Protective Order current set for 08/03/2020 is reset for 08/05/2020 at 9:30 am;	0.1	850	\$85.00
Caddell, Michael	07/14/20	Pleadings and Service	Review Sartell correspondence to and from Tamorelli, and team regarding scheduling meet and confer this week regarding Plaintiffs' Motion for Protective Order;	0.2	1075	\$215.00
Chapman, Cynthia	07/14/20	Pleadings and Service	Review Sartell correspondence to and from Tamorelli, and team regarding scheduling meet and confer this week regarding Plaintiffs' Motion for Protective Order;	0.2	850	\$170.00
Caddell, Michael	07/16/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding follow up on request for availability to meet and confer;	0.2	1075	\$215.00
Caddell, Michael	07/17/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding request for your availability to meet and confer; respond;	0.2	1075	\$215.00
Chapman, Cynthia	07/17/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding request for your availability to meet and confer; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	07/17/20	Motion Practice	Review email correspondence between Jordan Sartell and John Tamborelli regarding scheduling meet and confer on motion for protective order.	0.1	750	\$75.00
Caddell, Michael	07/20/20	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team regarding scheduling meet and confer regarding motion for protective order;	0.3	1075	\$322.50
Chapman, Cynthia	07/20/20	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team regarding scheduling meet and confer regarding motion for protective order;	0.1	850	\$85.00
Tabor, Amy	07/20/20	Motion Practice	Correspond via email with Jim Francis, Jordan Sartell, and opposing counsel regarding meet and confer to discuss motion for protective order.	0.1	750	\$75.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	07/21/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding meet and confer regarding motion for protective order; review Sartell correspondence to and from Tamborelli and team regarding follow up on our meeting and conferral, we reached an agreement regarding Defendant's Second Set of Discovery Requests, dated June 2, and Plaintiff's Motion for Protective Order;	0.3	1075	\$322.50
Chapman, Cynthia	07/21/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding meet and confer regarding motion for protective order; review Sartell correspondence to and from Tamborelli and team regarding meet and confer, Defendant's Second Set of Discovery Requests, and Plaintiff's Motion for Protective Order;	0.3	850	\$255.00
Tabor, Amy	07/21/20	Motion Practice	Review email from Jordan Sartell to John Tamborelli regarding agreement on motion for protective order.	0.2	750	\$150.00
Caddell, Michael	07/23/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding follow up regarding confirming agreement regarding Defendant's Second Set of Discovery Requests, dated June 2, and Plaintiff's Motion for Protective Order;	0.2	1075	\$215.00
Chapman, Cynthia	07/23/20	Written Discovery	Review Sartell correspondence to and from Tamborelli and team regarding confirming agreement regarding Defendant's Second Set of Discovery Requests and Plaintiff's Motion for Protective Order;	0.2	850	\$170.00
Tabor, Amy	07/23/20	Motion Practice	Review notes on CBC algorithm from Jonathan Jaffe; prepare email to Jonathan Jaffe regarding interpretation of CBC algorithm; prepare email to Jordan Sartell regarding status of meet and confer on production of consumer report data.	3.0	750	\$2,250.00
Caddell, Michael	07/27/20	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team regarding follow up on meet and confer discussion; review Sartell correspondence to and from Soumilas and team regarding liability memo on defendant's selective use of SDN list data;	0.5	1075	\$537.50
Chapman, Cynthia	07/27/20	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli and team regarding follow up on meet and confer; review Sartell correspondence to and from Soumilas and team regarding liability memo on defendant's selective use of SDN list data;	0.6	850	\$510.00
Tabor, Amy	07/27/20	Motion Practice	Correspond via email with Jordan Sartell regarding production of consumer report data; review email correspondence between Jordan Sartell and John Tamborelli regarding discovery dispute.	0.2	750	\$150.00
Kersh, Kathy	07/27/20	Pleadings and Service	Review docket sheet.	0.1	325	\$32.50
Caddell, Michael	07/29/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding verification in No. 1, do you mean verifying the interrogatory responses that correspond to the requests for admission; review Withdrawal of Motion for Protective Order;	0.3	1075	\$322.50
Chapman, Cynthia	07/29/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding verification in No. 1, do you mean verifying the interrogatory responses that correspond to the requests for admission; review Withdrawal of Motion for Protective Order;	0.2	850	\$170.00
Tabor, Amy	07/29/20	Motion Practice	Review email correspondence between Jordan Sartell and John Tamborelli regarding discovery dispute; correspond via email with Jordan Sartell regarding discovery dispute.	0.2	750	\$150.00
Caddell, Michael	07/30/20	Pleadings and Service	Review Minute Order Withdrawing Plaintiff's Notice of Withdraw of Motion for Protective Order;	0.1	1075	\$107.50
Chapman, Cynthia	07/30/20	Pleadings and Service	Review Minute Order Withdrawing Plaintiff's Notice of Withdraw of Motion for Protective Order;	0.1	850	\$85.00
Kersh, Kathy	07/30/20	Pleadings and Service	Review new filing and download same to network	0.1	325	\$32.50
Caddell, Michael	07/31/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team forwarding Plaintiff's Supplemental Answers to Defendant's Second Interrogatories;	0.3	1075	\$322.50
Chapman, Cynthia	07/31/20	Pleadings and Service	Review Sartell correspondence to Tamborelli and team forwarding Plaintiff's Supplemental Answers to Defendant's Second Interrogatories;	0.2	850	\$170.00
Caddell, Michael	08/04/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding Plaintiff's Supplemental Answers to Defendant's Second Interrogatories;	0.2	1075	\$215.00
Chapman, Cynthia	08/04/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell and team regarding Plaintiff's Supplemental Answers to Defendant's Second Interrogatories;	0.2	850	\$170.00
Caddell, Michael	08/05/20	Written Discovery	Review Labbe correspondence to and from Chapman, Tabor forwarding Jaffe Invoice; respond;	0.3	1075	\$322.50
Chapman, Cynthia	08/05/20	Written Discovery	Review Labbe correspondence to and from Caddell, Tabor forwarding Jaffe Invoice; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	08/25/20	Written Discovery	Review email correspondence from Jordan Sartell to opposing counsel regarding information to be produced in discovery.	0.1	750	\$75.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	08/25/20	Written Discovery	Teleconference with Jordan Sartell regarding status of discovery.	0.5	750	\$375.00
Caddell, Michael	08/26/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding Request for Status Update on Production of Compelled ESI;	0.2	1075	\$215.00
Chapman, Cynthia	08/26/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding Request for Status Update on Production of Compelled ESI;	0.2	850	\$170.00
Caddell, Michael	09/08/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding an update concerning the production of the class member data;	0.2	1075	\$215.00
Chapman, Cynthia	09/08/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding an update concerning the production of the class member data;	0.1	850	\$85.00
Caddell, Michael	09/21/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding third request for status update on production of compelled ESI; review Tabor correspondence to Sartell regarding second request for status update on production of compelled ESI; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	09/21/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding third request for status update on production of compelled ESI; review Tabor correspondence to Sartell regarding second request for status update on production of compelled ESI; conf w/ Caddell;	0.4	850	\$340.00
Tabor, Amy	09/21/20	Motion Practice	Correspond via email with Jordan Sartell regarding discovery status.	0.1	750	\$75.00
Caddell, Michael	09/23/20	Depositions	Review Sartell correspondence to and from Tabor regarding 30(b)(6) notice and forwarding same; respond; review Tabor correspondence to and from Sartell regarding status conference calendared for April 6, 2021; respond;	0.4	1075	\$430.00
Chapman, Cynthia	09/23/20	Depositions	Review Sartell correspondence to and from Tabor regarding 30(b)(6) notice and forwarding same; review Caddell response; review Tabor correspondence to and from Sartell regarding status conference calendared for April 6, 2021; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	09/24/20	Depositions	Review multiple Sartell correspondence to and from Tabor, Kersh regarding draft 30(b)(6) notice of deposition of defendant and forwarding draft notice; review Kersh correspondence to Tamborelli and counsel serving Plaintiff's Notice of Deposition of Defendant;	0.4	1075	\$430.00
Chapman, Cynthia	09/24/20	Depositions	Review multiple Sartell correspondence to and from Tabor, Kersh regarding draft 30(b)(6) notice of deposition of defendant and forwarding draft notice; review Kersh correspondence to Tamborelli and counsel serving Plaintiff's Notice of Deposition of Defendant;	0.2	850	\$170.00
Tabor, Amy	09/24/20	Depositions	Review and comment on draft deposition notice; correspond via email with Jordan Sartell regarding draft notice.	0.5	750	\$375.00
Kersh, Kathy	09/24/20	Depositions	Review email from cocounsel; download notice of depo; revise same; emails to attorneys regarding depo notice; review response; prepare correspondence to defense; serve depo notice by email and certified mail, rrr, scan documents to network; email to Tabor regarding ECF 55 deadline; review response	1.0	325	\$325.00
Caddell, Michael	09/25/20	Depositions	Review Tabor correspondence to and from Sartell, Kersh regarding taking defendant deposition;	0.3	1075	\$322.50
Chapman, Cynthia	09/25/20	Depositions	Review Tabor correspondence to and from Sartell, Kersh regarding deposition;	0.1	850	\$85.00
Tabor, Amy	09/25/20	Depositions	Correspond via email with Jordan Sartell regarding corporate representative deposition.	0.1	750	\$75.00
Caddell, Michael	09/29/20	Depositions	Review Sartell correspondence to and from Tabor, Kersh regarding handling defendant 30(b)(6) deposition;	0.2	1075	\$215.00
Chapman, Cynthia	09/29/20	Depositions	Review Sartell correspondence to and from Tabor, Kersh regarding 30(b)(6) deposition;	0.1	850	\$85.00
Caddell, Michael	09/30/20	Depositions	Prepare correspondence to and from Tabor, Sartell, Kersh regarding Tamborelli;	0.3	1075	\$322.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	10/01/20	Depositions	Correspond via email with Jordan Sartell and Jonathan Jaffee regarding preparation for corporate representative deposition.	0.1	750	\$75.00
Caddell, Michael	10/05/20	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding 30(b)(6) deposition notice of defendant; review Tamborelli correspondence to Sartell and team forwarding CBC Objections to Plaintiff's Notice of Deposition of Defendant;	0.4	1075	\$430.00
Chapman, Cynthia	10/05/20	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding 30(b)(6) deposition notice review Tamborelli correspondence to Sartell and team forwarding CBC Objections to Plaintiff's Notice of Deposition of Defendant;	0.3	850	\$255.00
Tabor, Amy	10/05/20	Depositions	Teleconference with Jordan Sartell and Jonathan Jaffee regarding preparation for depositions.	1.5	750	\$1,125.00
Kersh, Kathy	10/05/20	Depositions	Review emails from attorneys; review status of certified mail delivery to Tamborelli; respond to attorney emails; request updates from USPS regarding certified mail delivery to Tamborelli	0.3	325	\$97.50
Caddell, Michael	10/06/20	Written Discovery	Review Sartell correspondence to and from Tabor, Chapman, Caddell, Francis, Soumilas, Kersh, Kabacinski regarding Tamborelli objection to deposition notice of defendant; respond; review multiple Sartell correspondence to and from Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding availability today to discuss Defendant's objections; review Sartell correspondence to and from Chapman, Caddell, Tabor, Francis, Soumilas regarding filing the L.R. 251 (regarding R. 37 motions) request for hearing on discovery issue tomorrow, meeting and conferring and make a proper record for the court via the joint submission required under that rule; confs w/ Chapman;	0.6	1075	\$645.00
Chapman, Cynthia	10/06/20	Written Discovery	Review Sartell correspondence to and from Tabor, Chapman, Caddell, Francis, Soumilas, Kersh, Kabacinski regarding Tamborelli objection to deposition notice of defendant; review Caddell response; review multiple Sartell correspondence to and from Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding availability today to discuss Defendant's objections and determine whether dispute should be framed for Magistrate Judge Oberto; review Sartell correspondence to and from Chapman, Caddell, Tabor, Francis, Soumilas regarding filing request for hearing on discovery issue; confs w/ Caddell;	0.5	850	\$425.00
Kersh, Kathy	10/06/20	Depositions	Review emails from attorneys; download and review objection to deposition from Tamborelli	0.4	325	\$130.00
Caddell, Michael	10/07/20	Depositions	Review Tamborelli correspondence to and from Sartell, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding providing in writing your position in response to the objections and I will be available to discuss at 11 am on 10/9/20 pst so long as I receive your written position sufficiently in advance; review Motion to Compel Deposition of Defendant and regarding Motion Hearing Set for October 28, 2020 at 9:30am; review Sartell correspondence to and from Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding filed motion to compel Defendant's Deposition, invoking the process set forth in Local Rule 251 and regarding scheduling a meet and confer on Friday at 11am; review Sartell correspondence to Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas forwarding conference call information;	0.5	1075	\$537.50
Chapman, Cynthia	10/07/20	Depositions	Review Tamborelli correspondence to and from Sartell, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding written position on response to the objections; review Motion to Compel Deposition of Defendant and regarding Motion Hearing Set for October 28, 2020; review Sartell correspondence to and from Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding motion to compel Defendant's Deposition, invoking Local Rule 251process, and scheduling meet and confer; review Sartell correspondence to Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas;	0.4	850	\$340.00
Caddell, Michael	10/08/20	Depositions	Review Kersh correspondence to team regarding we have received the green card back from Tamborelli, regarding the notice of deposition;	0.1	1075	\$107.50
Chapman, Cynthia	10/08/20	Depositions	Review Kersh correspondence to team regarding service notice of deposition;	0.1	850	\$85.00
Kersh, Kathy	10/08/20	Pleadings and Service	Revie green card from postal service; email to attorneys about green card; review emails from attorneys; download new filings to network	0.3	325	\$97.50
Caddell, Michael	10/09/20	Depositions	Review multiple Sartell correspondence to and from Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding advising if we can push our call back 30 minutes to 11:30 PST; review Sartell correspondence to and from Tamborelli and team forwarding Response to Defendant's Objections to 30(b)(6) notice and regarding discussing the merits of Defendant's position on Monday at 11 am PST or will be forced to advise the Court that Defendant has refused to meet and confer;	0.5	1075	\$537.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	10/09/20	Depositions	Review multiple Sartell correspondence to and from Tamborelli, Kersh, Chapman, Caddell, Tabor, Francis, Soumilas regarding call; review Sartell correspondence to and from Tamborelli and team forwarding Response to Defendant's Objections to 30(b)(6) notice and regarding discussing the merits of Defendant's;	0.2	850	\$170.00
Tabor, Amy	10/09/20	Written Discovery	Review motion to compel; calendar hearing date; review correspondence with opposing counsel regarding discovery dispute; correspond via email with Jordan Sartell regarding discovery dispute.	0.3	750	\$225.00
Caddell, Michael	10/12/20	Pleadings and Service	Review Sartell correspondence to Tamborelli, Caddell, Tabor, Caddell, Chapman, Francis, Soumilas regarding dispositive motions and forwarding joint scheduling report;	0.3	1075	\$322.50
Chapman, Cynthia	10/12/20	Pleadings and Service	Review Sartell correspondence to Tamborelli, Tabor, Caddell, Francis, Soumilas regarding dispositive motions and forwarding joint scheduling report;	0.2	850	\$170.00
Kersh, Kathy	10/12/20	Depositions	Review emails from attorneys; respond to Sartell email about depositions; email depositions to Sartell	0.2	325	\$65.00
Caddell, Michael	10/13/20	Depositions	Review Tamborelli correspondence to and from Sartell, Tabor, Caddell, Chapman, Francis, Soumilas regarding reading footnote 1; review Tamborelli correspondence to and from Sartell, Kersh, Chapman, Tabor, Francis, Soumilas regarding objection to Plaintiff's Notice of Deposition of Defendant; review Sartell correspondence to and from team regarding Tamborelli; respond; review Sartell correspondence to and from Tamborelli and team regarding advising whether Darin Larsen and Frank Larsen are available to appear on Friday, 10/16, Wednesday, 10/21, Thursday 10/22, or Friday 10/23 and whether they will both be appearing on the same day;	0.5	1075	\$537.50
Chapman, Cynthia	10/13/20	Pleadings and Service	Review Tamborelli correspondence to and from Sartell, Tabor, Caddell,	0.3	850	\$255.00
Tabor, Amy	10/13/20	Depositions	Review Tamborelli correspondence regarding dispute over deposition notice; correspond via email with Jordan Sartell regarding dispute over deposition notice.	0.2	750	\$150.00
Caddell, Michael	10/14/20	Depositions	Correspondence to Chapman, Francis, Soumilas; review Tamborelli correspondence to and from Sartell, Kersh, Chapman, Tabor, Francis, Soumilas regarding objection to Plaintiff's Notice of Deposition of Defendant; review Sartell correspondence to and from team regarding Tamborelli; review Caddell response; review Sartell correspondence to and from Tamborelli and team regarding advising whether Darin Larsen and Frank Larsen deposition dates;	0.6	1075	\$645.00
Chapman, Cynthia	10/14/20	Depositions	Review multiple Sartell correspondence to and from Tabor, Caddell, Francis, Soumilas regarding Tamborelli's objections to Plaintiff's Notice of Deposition; review Caddell response; review Sartell correspondence to and from Tamborelli, Kersh, Caddell, Tabor, Francis, Soumilas regarding deposition duration table;	0.4	850	\$340.00
Tabor, Amy	10/14/20	Depositions	Correspond via email with Jordan Sartell regarding corporate representative deposition.	0.1	750	\$75.00
Kersh, Kathy	10/14/20	Depositions	Review emails from attorneys regarding depositions and discovery	0.2	325	\$65.00
Caddell, Michael	10/15/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Caddell, Kersh, Chapman, Tabor, Francis, Soumilas regarding advising if we have an agreement;	0.2	1075	\$215.00
Chapman, Cynthia	10/15/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Caddell, Kersh, Tabor, Francis, Soumilas regarding agreement;	0.1	850	\$85.00
Tabor, Amy	10/15/20	Depositions	Correspond via email with co-counsel and opposing counsel regarding resolution of dispute over corporate representative deposition.	0.2	750	\$150.00
Kersh, Kathy	10/15/20	Depositions	Review emails regarding status of depositions	0.2	325	\$65.00
Caddell, Michael	10/19/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding following up on dates	0.2	1075	\$215.00
Chapman, Cynthia	10/19/20	Pleadings and Service	Review Sartell correspondence to and from Tamborelli and team regarding following up on dates;	0.2	850	\$170.00
Caddell, Michael	10/20/20	Depositions	Review Sartell correspondence to and from Tamborelli, and team regarding providing the witnesses' availability for this deposition by the close of business today;	0.2	1075	\$215.00
Chapman, Cynthia	10/20/20	Depositions	Review Sartell correspondence to and from Tamborelli and team regarding providing the witnesses' availability for depositions;	0.1	850	\$85.00
Tabor, Amy	10/20/20	Motion Practice	Teleconference with Jordan Sartell regarding case status and strategy; review email communications with opposing counsel regarding deposition scheduling.	0.5	750	\$375.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Kersh, Kathy	10/20/20	Pleadings and Service	Review emails from cocounsel	0.1	325	\$32.50
Caddell, Michael	10/21/20	Depositions	Review multiple Sartell correspondence to and from Tamborelli and team regarding memorialize the resolution of the outstanding motion to compel defendant's deposition and forwarding draft stipulation and notice of withdrawal of motion to compel; review Sartell correspondence to and from Kersh and team regarding serving Plaintiff's Revised 30(b)(6) Notice of Deposition of Defendant; review Kersh correspondence to and from Tamborelli and team serving Plaintiff's Revised Notice of Deposition of Defendant; review Stipulation regarding Motion to Compel Deposition of Defendant and Withdrawal of Motion;	0.5	1075	\$537.50
Chapman, Cynthia	10/21/20	Depositions	Review multiple Sartell correspondence to and from Tamborelli and team regarding motion to compel defendant's deposition and forwarding draft stipulation and notice of withdrawal of motion to compel; review Sartell correspondence to and from Kersh and team regarding serving Plaintiff's Revised 30(b)(6) Notice of Deposition of Defendant; review Kersh correspondence to and from Tamborelli and team serving Plaintiff's Revised Notice of Deposition of Defendant; review Stipulation regarding Motion to Compel Deposition of Defendant and Withdrawal of Motion;	0.5	850	\$425.00
Tabor, Amy	10/21/20	Motion Practice	Review and comment on draft stipulation to resolve discovery dispute; teleconference with Jordan Sartell regarding resolution of discovery dispute.	0.5	750	\$375.00
Kersh, Kathy	10/21/20	Depositions	Review emails from attorneys; download revised deposition notice and serve same by email; download new filing to network	0.3	325	\$97.50
Caddell, Michael	10/22/20	Pleadings and Service	Review Minute Order - Text Entry Only - Pursuant to the parties' Stipulation and Notice of Withdrawal of Motion to Compel Plaintiff's Motion to Compel is Withdrawn, and the hearing on the Motion, set for October 28, 2020, is hereby Vacated;	0.1	1075	\$107.50
Chapman, Cynthia	10/22/20	Pleadings and Service	Review Minute Order regarding Motion to Compel Plaintiff's Motion to Compel is Withdrawn;	0.1	850	\$85.00
Caddell, Michael	10/27/20	Depositions	Review Tamborelli correspondence to Kersh, Sartell and team forwarding Defendant Credit Bureau Connection Inc.'s Second Objections to Plaintiff's Notice of Deposition of Defendant; conf w/ Chapman;	0.3	1075	\$322.50
Chapman, Cynthia	10/27/20	Depositions	Review Tamborelli correspondence to Kersh, Sartell and team forwarding Defendant Credit Bureau Connection Inc.'s Second Objections to Plaintiff's Notice of Deposition of Defendant; conf w/ Caddell;	0.3	850	\$255.00
Caddell, Michael	10/28/20	Depositions	Review Kabacinski correspondence to and from Tamborelli, Kersh, Chapman, Tabor, Soumilas, Francis, Sartell regarding Zoom videoconference link for the deposition and forwarding link;	0.1	1075	\$107.50
Chapman, Cynthia	10/28/20	Depositions	Review Kabacinski correspondence to and from Tamborelli, Kersh, Caddell, Tabor, Soumilas, Francis, Sartell regarding Zoom videoconference link for the deposition and forwarding link;	0.1	850	\$85.00
Kersh, Kathy	10/28/20	Depositions	Review emails about deposition tomorrow	0.1	325	\$32.50
Tabor, Amy	10/29/20	Depositions	Attend CBC corporate representative deposition; teleconference with Jordan Sartell regarding deposition follow up.	6.0	750	\$4,500.00
Caddell, Michael	10/30/20	Written Discovery	Review Kabacinski correspondence to and from team, Tamborelli forwarding the exhibits presented at yesterday's 30(b)(6) deposition of Credit Bureau Connection, Inc.; review Sartell correspondence to Tamborelli, Kabacinski and team forwarding post deposition letter regarding discovery;	0.5	1075	\$537.50
Caddell, Michael	11/02/20	Written Discovery	Review Labbe correspondence to and from Tabor, Chapman forwarding Jaffe invoice; respond;	0.2	1075	\$215.00
Chapman, Cynthia	11/02/20	Written Discovery	Review Labbe correspondence to and from Tabor, Caddell forwarding Jaffe invoice; review Caddell response;	0.2	850	\$170.00
Tabor, Amy	11/02/20	Written Discovery	Review and approve invoice from Jonathan Jaffee.	0.1	750	\$75.00
Caddell, Michael	11/03/20	Depositions	Review multiple Tamborelli correspondence to and from Sartell and team regarding written response and forwarding Post Deposition Letter regarding Discovery;	0.4	1075	\$430.00
Chapman, Cynthia	11/03/20	Depositions	Review multiple Tamborelli correspondence to and from Sartell and team regarding written response and forwarding Post Deposition Letter regarding Discovery;	0.2	850	\$170.00
Caddell, Michael	11/04/20	Pleadings and Service	Review Tamborelli correspondence to Sartell and team forwarding CBC response to 10/30/20 meet and confer;	0.3	1075	\$322.50
Chapman, Cynthia	11/04/20	Pleadings and Service	Review Tamborelli correspondence to Sartell and team forwarding CBC response to 10/30/20 meet and confer;	0.1	850	\$85.00
Tabor, Amy	11/04/20	Motion Practice	Review correspondence from John Tamborelli regarding discovery dispute.	0.2	750	\$150.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	11/09/20	Pleadings and Service	Review Motion for Summary Judgment; review Memorandum in Support of Motion for Summary Judgment; review Tamborelli correspondence to Sartell and team forwarding proposed Order for Summary Judgment, Proposed Order for Partial Summary Judgment, etc.;	1.0	1075	\$1,075.00
Chapman, Cynthia	11/09/20	Pleadings and Service	Review Motion for Summary Judgment; review Memorandum in Support of Motion for Summary Judgment; review Tamborelli correspondence to Sartell and team forwarding proposed Order for Summary Judgment, Proposed Order for Partial Summary Judgment, etc.;	0.8	850	\$680.00
Tabor, Amy	11/09/20	Motion Practice	Prepare email correspondence to Jordan Sartell regarding discovery dispute.	0.1	750	\$75.00
Tabor, Amy	11/10/20	Motion Practice	Review motion for summary judgment and supporting documents; outline response; teleconference with Jordan Sartell regarding response.	4.0	750	\$3,000.00
Kersh, Kathy	11/10/20	Pleadings and Service	Review and download new filings to network	0.2	325	\$65.00
Labbe, Felicia	11/10/20	Pleadings and Service	Review Tabor correspondence regarding drafting Plaintiff's Response to Statement of Undisputed Facts and Plaintiff's Statement of Disputed Facts;	1.5	175	\$262.50
Tabor, Amy	11/11/20	Motion Practice	Review authorities cited in summary judgment briefing; research applicability of FCRA to resellers.	4.5	750	\$3,375.00
Tabor, Amy	11/12/20	Motion Practice	Research reseller issues for response to motion for summary judgment.	2.0	750	\$1,500.00
Tabor, Amy	11/13/20	Motion Practice	Review deposition transcripts; outline response to motion for summary judgment.	3.0	750	\$2,250.00
Tabor, Amy	11/16/20	Motion Practice	Research applicability of FCRA; draft response to motion for summary judgment.	5.0	750	\$3,750.00
Kersh, Kathy	11/16/20	Depositions	Review email from Tabor; print depo exhibit 4 to pdf and combine tabs; respond to Tabor email	0.4	325	\$130.00
Tabor, Amy	11/17/20	Motion Practice	Research admissibility of expert testimony; correspond via email with Jordan Sartell regarding authorities on admissibility of expert testimony.	2.0	750	\$1,500.00
Kersh, Kathy	11/17/20	Pleadings and Service	Review email from Tabor; download document to network; review spam filters, inbox, and deleted items folder for NEF; respond to Tabor email; download updated Kang docket sheet	0.3	325	\$97.50
Tabor, Amy	11/18/20	Motion Practice	Research evidentiary issues; draft response to motion for summary judgment.	4.0	750	\$3,000.00
Tabor, Amy	11/19/20	Motion Practice	Research admissibility of expert testimony; draft motion to strike; draft response to Motion for Summary Judgment.	3.0	750	\$2,250.00
Tabor, Amy	11/23/20	Motion Practice	Draft motion to exclude testimony of Dean Binder.	4.0	750	\$3,000.00
Tabor, Amy	11/24/20	Motion Practice	Draft response to Motion for Summary Judgment; draft Motion to Exclude Binder Declaration.	6.0	750	\$4,500.00
Tabor, Amy	11/25/20	Motion Practice	Draft response to motion for summary judgment; draft motion to exclude Binder declaration.	8.0	750	\$6,000.00
Tabor, Amy	11/26/20	Motion Practice	Draft response to motion for summary judgment.	7.0	750	\$5,250.00
Tabor, Amy	11/27/20	Motion Practice	Draft response to motion for summary judgment.	10.0	750	\$7,500.00
Tabor, Amy	11/28/20	Motion Practice	Draft response to motion for summary judgment.	8.0	750	\$6,000.00
Tabor, Amy	11/29/20	Motion Practice	Draft response to motion for summary judgment.	9.0	750	\$6,750.00
Caddell, Michael	11/30/20	Pleadings and Service	Review multiple Tabor correspondence to and from Sartell and team regarding response to motion for summary judgment and forwarding draft response; prepare multiple responses; review Tabor correspondence to and from Sartell and team regarding Caddell declaration and forwarding draft declaration; review Tabor correspondence to and from Sartell and team forwarding motion to exclude Dean Binder's testimony; prepare multiple responses; review Kersh correspondence to Judge Ishii, team, Tamborelli forwarding copy of the Plaintiff's Request to File Documents Under Seal, copies of the documents for which sealing is sought, and a proposed Order in Word format; review Notice to Request to Seal Documents; review Motion to Certify Class, Motion Hearing Set for 12/1/2021 at 1:30pm; review Kabacinski correspondence to Kersh, team, Tamborelli forwarding the unredacted versions of Plaintiff's Memorandum of Law and the Declaration of Jordan M. Sartell, filed in support of Plaintiff's Motion to Certify Class; review Response to Motion for Summary Judgment; review Motion to Strike Declaration of Dean Binder regarding Memorandum in Support; confs w/ Chapman;	2.8	1075	\$3,010.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	11/30/20	Pleadings and Service	Review multiple Tabor correspondence to and from Sartell and team regarding response to motion for summary judgment and forwarding draft response; review multiple Caddell responses; review Tabor correspondence to and from Sartell and team regarding Caddell declaration and forwarding draft declaration; review Tabor correspondence to and from Sartell and team forwarding motion to exclude Dean Binder's testimony; review multiple responses from Caddell; review Kersh correspondence to Judge Ishii, team, Tamborelli forwarding copy of the Plaintiff's Request to File Documents Under Seal, copies of the documents for which sealing is sought, and a proposed Order in Word format; review Notice to Request to Seal Documents; review Motion to Certify Class, Motion Hearing Set for 12/1/2021 at 1:30pm; review Kabacinski correspondence to Kersh, team, Tamborelli forwarding the unredacted versions of Plaintiff's Memorandum of Law and the Declaration of Jordan M. Sartell, filed in support of Plaintiff's Motion to Certify Class; review Response to Motion for Summary Judgment; review Motion to Strike Declaration of Dean Binder regarding Memorandum in Support; Confs with Caddell;	2.5	850	\$2,125.00
Tabor, Amy	11/30/20	Motion Practice	Finalize and file response to motion for summary judgment and motion to exclude Binder declaration.	12.0	750	\$9,000.00
Kersh, Kathy	11/30/20	Pleadings and Service	Review exhibits and email from Tabor; revise exhibits; review local rules on filing documents under seal; prepare and revise notice of filing under seal and request to file under seal, also proposed order; email to Judge and opposing counsel; efile notice of request to file documents under seal; assist with efilings response to MSJ; email proposed orders to Judge Ishii	10.4	325	\$3,380.00
Labbe, Felicia	11/30/20	Pleadings and Service	Correspondence to and from Tabor regarding generating TOA/TOC for response to motion for summary judgment and send to Tabor; review correspondence to and from Tabor regarding dupe and revise Caddell declaration; dupe and revise Caddell declaration and send to Tabor;	3.0	175	\$525.00
Caddell, Michael	12/01/20	Pleadings and Service	Review Tamborelli correspondence to and from Kabacinski and team regarding papers are a week late and regarding filing an objection and move to strike; review Tamborelli correspondence to and from Kabacinski and team regarding disregard as local rule 230 appears to apply; review Tamborelli correspondence to and from Kabacinski and team regarding sending by noon today pst the word version of plaintiffs ss of additional facts; review Kabacinski correspondence to and from Gonzales, team, Tamborelli forwarding the unredacted versions of Plaintiff's Memorandum and the Declaration of Jordan Sartell, filed in support of Plaintiff's Motion to Certify Class last night;	0.9	1075	\$967.50
Chapman, Cynthia	12/01/20	Pleadings and Service	Review Tamborelli correspondence to and from Kabacinski and team regarding papers are a week late and regarding filing an objection and move to strike; review Tamborelli correspondence to and from Kabacinski and team regarding local rule 230; review Tamborelli correspondence to and from Kabacinski and team regarding Word version of Plaintiff's Separate Statement of additional facts; review Kabacinski correspondence to and from Gonzales, team, Tamborelli forwarding the unredacted versions of Plaintiff's Memorandum and the Declaration of Jordan Sartell, filed in support of Plaintiff's Motion to Certify Class;	1.0	850	\$850.00
Tabor, Amy	12/01/20	Motion Practice	Correspond via email with Jordan Sartell regarding Motion for Sanctions; correspond via email with opposing counsel regarding papers in opposition to motion for summary judgment; review motion for class certification.	3.0	750	\$2,250.00
Kersh, Kathy	12/01/20	Pleadings and Service	Review emails from Court; download e-filed documents to network; prepare correspondence to judge and judge's copies; Fed Ex copies to judge; review email from co-counsel; telephone call with Clerk; respond to email from Tabor! review rule on courtesy copies	2.0	325	\$650.00
Tabor, Amy	12/02/20	Motion Practice	Review filings; assemble notebook for motion for summary judgment hearing; calendar deadlines.	1.5	750	\$1,125.00
Kersh, Kathy	12/02/20	Pleadings and Service	Review Fed Ex confirmation of delivery of courtesy copies to clerk	0.1	325	\$32.50
Caddell, Michael	12/07/20	Pleadings and Service	Review Reply by CBC regarding Motion for Summary Judgment, Memorandum in Support of Motion; review Opposition by CBC to Motion to Strike; review Tamborelli correspondence to Tabor, Kabacinski, Kersh, Chapman, Sartell, Francis forwarding same;	1.0	1075	\$1,075.00
Chapman, Cynthia	12/07/20	Pleadings and Service	Review Reply by CBC regarding Motion for Summary Judgment, Memorandum in Support of Motion; review Opposition by CBC to Motion to Strike; review Tamborelli correspondence to Tabor, Kabacinski, Kersh, Caddell, Sartell, Francis forwarding same;	0.8	850	\$680.00
Caddell, Michael	12/08/20	Pleadings and Service	Review Tabor correspondence to and from Sartell regarding Tamborelli responded to Plaintiff's Statement of Disputed Facts by arguing that all of the facts we cited as material to whether CBC is a CRA are disputed and regarding filing motion for summary judgment; review Tabor correspondence to and from Kersh regarding Motion for Summary Judgment Hearing Wed Dec 14 and preparing a notebook; prepare for MSJ hearing; respond; review Minute Order - Text Only - the Court has deemed the Motion for Summary Judgment, Doc. No. [81] and Motion to Strike, Doc. No [86], noticed for hearing on 12/14/2020, before District Judge Anthony W. Ishii, suitable for decision without oral argument pursuant to Local Rule 230(g) and as such, the hearing on same is Vacated and the matter will be taken under submission as of that date; review Tabor correspondence regarding Good news - Judge Ishii will decide CBC's motion on the papers and no hearing notebook needed; respond;	1.2	1075	\$1,290.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	12/08/20	Pleadings and Service	Review Tabor correspondence to and from Sartell, Caddell regarding response to Plaintiff's Statement of Disputed Facts; review Tabor correspondence to and from Kersh regarding Motion for Summary Judgment Hearing and required preparation; review Caddell response; review Minute Order regarding hearing on Motion for Summary Judgment and Motion to Strike; review Tabor correspondence regarding hearing; review Caddell response;	0.4	850	\$340.00
Tabor, Amy	12/08/20	Motion Practice	Review reply in support of motion for summary judgment; assemble materials for hearing notebook; review response to motion to strike; correspond via email with Michael Caddell, Kathy Kersh, and Jordan Sartell regarding preparation for hearing; review order vacating hearing.	3.0	750	\$2,250.00
Kersh, Kathy	12/08/20	Pleadings and Service	Download new filings to network	0.3	325	\$97.50
Caddell, Michael	12/09/20	Pleadings and Service	Review Court Notice regarding Sealed Event;	0.1	1075	\$107.50
Chapman, Cynthia	12/09/20	Pleadings and Service	Review Court Notice regarding Sealed Event;	0.4	850	\$340.00
Kersh, Kathy	12/09/20	Pleadings and Service	Review new NEF; attempt to access sealed document; email to Tabor regarding same	0.1	325	\$32.50
Kersh, Kathy	12/10/20	Pleadings and Service	Download new scheduling order; compare to previous scheduling order and update case management notebook	0.3	325	\$97.50
Kersh, Kathy	12/11/20	Pleadings and Service	Telephone call to clerk regarding sealed event (ECF 90); leave message for clerk	0.1	325	\$32.50
Caddell, Michael	12/14/20	Pleadings and Service	Review Kersh correspondence to and from Tabor, Francis, Caddell, Chapman, Sartell, Soumilas, Kabacinski regarding our request to seal has been granted and I emailed the sealed exhibits to the court's sealed document email address ApprovedSealed@caed.uscourts.gov today; respond; review Court Notices regarding Sealed Event;	0.3	1075	\$322.50
Chapman, Cynthia	12/14/20	Pleadings and Service	Review Kersh correspondence to and from Tabor, Francis, Caddell, Chapman, Sartell, Soumilas, Kabacinski regarding our request to seal; review Caddell response; review Court Notices regarding Sealed Event;	0.1	850	\$85.00
Kersh, Kathy	12/14/20	Pleadings and Service	Telephone call with clerk; email to Kabacinski regarding sealed documents; email sealed documents to clerk; review NEFs regarding sealed documents; email to attorneys to notify that sealed docs have been submitted. Download updated docket sheet to network; review local rules regarding emailing sealed documents; prepare email to clerk	0.7	325	\$227.50
Kersh, Kathy	12/16/20	Pleadings and Service	Review Sartell email about green card; locate hard copy of green card and scan to network; respond to email and send scan of green card to Sartell	0.4	325	\$130.00
Caddell, Michael	12/21/20	Pleadings and Service	Review Order on Plaintiff's Motion for Class Certification signed by District Judge Anthony W. Ishii on 12/21/2020, it is Hereby Ordered Plaintiff's motion for class certification (Doc. No. [84]) is denied, all dates associated with Plaintiff's motion, including the February 1, 2021 motion hearing, are vacated; conf w/ Chapman;	0.6	1075	\$645.00
Chapman, Cynthia	12/21/20	Pleadings and Service	Review Order on Plaintiff's Motion for Class Certification signed by District Judge Anthony W. Ishii on 12/21/2020; conf w/ Caddell;	0.6	850	\$510.00
Kersh, Kathy	12/21/20	Pleadings and Service	Review new filings and download same to network; distribute filings to attorneys; update calendar entries	0.4	325	\$130.00
Caddell, Michael	03/04/21	Pleadings and Service	Review Order on Defendant's Motion for Summary Judgment signed by District Judge Anthony W. Ishii on 3/04/2021, It is Hereby Ordered that Credit Bureau's motion for summary judgment (Doc. No. [81]) is Denied, Kang's motion to strike (Doc No. [86]) is Denied as unnecessary; conf w/ Chapman;	0.8	1075	\$860.00
Chapman, Cynthia	03/04/21	Pleadings and Service	Review Order on Defendant's Motion for Summary Judgment signed by District Judge Anthony W. Ishii on 3/04/2021; conf w/ Caddell;	0.8	850	\$680.00
Tabor, Amy	03/04/21	Motion Practice	Review order denying motion for summary judgment; prepare email to Jordan Sartell regarding denial of summary judgment and status of discovery dispute.	0.1	750	\$75.00
Caddell, Michael	03/05/21	Pleadings and Service	Review Sartell correspondence to and from Soumilas, Francis, Tabor, Caddell, Chapman regarding Order Denying Defendant's MSI; review Chapman multiple responses;	0.4	1075	\$430.00
Chapman, Cynthia	03/05/21	Pleadings and Service	Review Sartell correspondence to and from Soumilas, Francis, Tabor, Caddell, Chapman regarding Order Denying Defendant's MSI; prepare multiple responses;	0.5	850	\$425.00
Caddell, Michael	03/08/21	Written Discovery	Review Sartell correspondence to Tamborelli, Francis, Tabor, Caddell, Soumilas, Chapman forwarding correspondence regarding the outstanding discovery that the court compelled;	0.3	1075	\$322.50
Chapman, Cynthia	03/08/21	Written Discovery	Review Sartell correspondence to Tamborelli, Francis, Tabor, Soumilas, Chapman forwarding correspondence regarding the outstanding discovery that the court compelled;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	03/08/21	Motion Practice	Review draft meet and confer letter to John Tamborelli; teleconference with Jordan Sartell regarding motion to compel and motion for sanctions.	0.5	750	\$375.00
Caddell, Michael	03/11/21	Pleadings and Service	Review Motion to Compel information and documents responsive to Plaintiffs Interrogatory Nos. 5-6 and Request for Production No. 3 and for sanctions, Motion for Sanctions, Motion Hearing set for 4/7/2021 at 09:30 AM in Courtroom 7;	0.4	1075	\$430.00
Chapman, Cynthia	03/11/21	Pleadings and Service	Review Motion to Compel information and documents responsive to Plaintiff's Interrogatory Nos. 5-6 and Request for Production No. 3 and for sanctions, Motion for Sanctions;	0.5	850	\$425.00
Tabor, Amy	03/11/21	Motion Practice	Review notice of motion to compel; calendar deadlines.	0.2	750	\$150.00
Caddell, Michael	03/12/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Francis, Soumilas, Caddell, Tabor, Chapman regarding no response to March 8 letter and regarding scheduling a meet and confer next week;	0.3	1075	\$322.50
Chapman, Cynthia	03/12/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Francis, Soumilas, Caddell, Tabor, Chapman regarding March 8 letter and meet and confer next week;	0.2	850	\$170.00
Caddell, Michael	03/16/21	Pleadings and Service	Review Tamborelli correspondence to Sartell, Francis, Soumilas, Caddell, Tabor, Chapman regarding written response tomorrow and regarding scheduling telephone conference to further discuss;	0.3	1075	\$322.50
Chapman, Cynthia	03/16/21	Pleadings and Service	Review Tamborelli correspondence to Sartell, Francis, Soumilas, Caddell, Tabor, Chapman regarding written response tomorrow and regarding telephone conference to further discuss;	0.1	850	\$85.00
Caddell, Michael	03/17/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Francis, Soumilas, Tabor, Caddell, Chapman regarding scheduling telephone conference tomorrow;	0.3	1075	\$322.50
Chapman, Cynthia	03/17/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Francis, Soumilas, Tabor, Caddell, Chapman regarding telephone conference;	0.1	850	\$85.00
Caddell, Michael	03/18/21	Written Discovery	Review Sartell correspondence regarding discovery meet and confer; review Tamborelli correspondence to and from Sartell, Francis, Soumilas, Caddell, Tabor, Chapman forwarding CBC response to 03/08/21 meet and confer;	0.4	1075	\$430.00
Chapman, Cynthia	03/18/21	Written Discovery	Review Sartell correspondence regarding discovery meet and confer; review Tamborelli correspondence to and from Sartell, Francis, Soumilas, Caddell, Tabor, Chapman forwarding CBC response to 03/08/21 meet and confer;	0.1	850	\$85.00
Tabor, Amy	03/18/21	Motion Practice	Meet and confer with opposing counsel regarding discovery dispute; teleconference with Jordan Sartell regarding discovery dispute.	1.0	750	\$750.00
Caddell, Michael	03/23/21	Pleadings and Service	Review Sartell correspondence to and from Caddell, Tabor, Chapman, Francis, Soumilas regarding thoughts on the draft joint status report and forwarding same; respond; review Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas regarding draft joint status report and forwarding same;	0.5	1075	\$537.50
Chapman, Cynthia	03/23/21	Pleadings and Service	Review Sartell correspondence to and from Tabor, Caddell, Caddell, Francis, Soumilas regarding draft joint status report and forwarding same; review Caddell response; review Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas regarding draft joint status report and forwarding same;	0.4	850	\$340.00
Caddell, Michael	03/26/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas regarding draft joint status report and forwarding same;	0.2	1075	\$215.00
Chapman, Cynthia	03/26/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas regarding draft joint status report and forwarding same;	0.2	850	\$170.00
Caddell, Michael	03/29/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas forwarding joint status report which is due tomorrow to Magistrate Judge Oberto;	0.2	1075	\$215.00
Chapman, Cynthia	03/29/21	Pleadings and Service	Review Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas forwarding joint status;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	03/30/21	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas regarding draft joint status report and regarding scheduling telephone conference to further discuss; review Kabacinski correspondence to Judge Oberto, Francis, Soumilas, Sartell, Caddell, Chapman, Tabor, Tamborelli forwarding the Joint Status Report and [Proposed] Scheduling Order; review Joint Status Report; review Notice of Withdrawal of Motion regarding Motion to Compel information and documents responsive to Plaintiffs Interrogatory Nos. 5-6 and Request for Production No. 3 and for sanctions Motion for Sanctions; review Minute Order regarding the parties are Granted permission to appear telephonically for the upcoming Scheduling Conference set on 4/6/2021 before Judge Oberto by dialing 888-557-8511 (access code 6208204), at the time of the hearing, you shall email Courtroom Deputy Wendy Kusamura, at WKusamura@caed.uscourts.gov, to advise the court who will be appearing telephonically; review Tabor correspondence to and from Sartell, Caddell, Chapman regarding notifying that I will be calling in for the Scheduling Conference;	0.8	1075	\$860.00
Chapman, Cynthia	03/30/21	Pleadings and Service	Review multiple Sartell correspondence to and from Tamborelli, Caddell, Chapman, Tabor, Francis, Soumilas regarding draft joint status report and regarding scheduling telephone conference; review Kabacinski correspondence to Judge Oberto, Francis, Soumilas, Sartell, Caddell, Chapman, Tabor, Tamborelli forwarding the Joint Status Report and Proposed Scheduling Order; review Joint Status Report; review Notice of Withdrawal of Motion regarding Motion to Compel information and documents responsive to Plaintiffs Interrogatory Nos. 5-6 and Request for Production No. 3 and for sanctions Motion for Sanctions; review Minute Order regarding the upcoming Scheduling Conference set on 4/6/2021 before Judge Oberto; review Tabor correspondence to and from Sartell, Caddell, Chapman regarding attendance at Scheduling Conference;	0.6	850	\$510.00
Kersh, Kathy	03/30/21	Pleadings and Service	Review and download new CM-ECF filings	0.3	325	\$97.50
Caddell, Michael	03/31/21	Pleadings and Service	Review Minute Order signed by Magistrate Judge Sheila K. Oberto on 3/31/2021: (Text Only Entry) Pursuant to Plaintiff's Notice of Withdrawal of Motion to Compel and for Sanctions, the Motion to Compel and for Sanctions is Withdrawn, and the hearing on the Motion, set for April 7, 2021, is hereby Vacated; review Sartell correspondence to and from Caddell, Tabor, Chapman regarding notifying the court's deputy now that Tabor and I will be appearing telephonically; respond; review Sartell correspondence to and from Kusamura regarding Tabor and Sartell will be appearing telephonically for plaintiff on April 6 for the scheduling conference with Magistrate Judge Oberto; review Tamborelli correspondence to and from Kusamura, Sartell, Caddell, Tabor, Chapman, Francis, Soumilas regarding appearing telephonically for Defendant on April 6 for the scheduling conference with Magistrate Judge Oberto;	0.4	1075	\$430.00
Chapman, Cynthia	03/31/21	Pleadings and Service	Review Minute Order signed by Magistrate Judge Sheila K. Oberto on 3/31/2021; review Sartell correspondence to and from Caddell, Tabor, Chapman regarding notifying the court's deputy of counsel's attendance; review Caddell response; review Sartell correspondence to and from Kusamura regarding Tabor and Sartell attending scheduling conference with Magistrate Judge Oberto; review Tamborelli correspondence to and from Kusamura, Sartell, Caddell, Tabor, Chapman, Francis, Soumilas regarding appearing telephonically for Defendant on April 6 for the scheduling conference with Magistrate Judge Oberto;	0.3	850	\$255.00
Caddell, Michael	04/06/21	Pleadings and Service	Review Minutes (Text Only) for Proceedings Held Telephonically before Magistrate Judge Oberto - Scheduling Conference; review Scheduling Order regarding the Motion for Class Certification signed by Magistrate Judge Sheila K. Oberto on 4/6/2021, Status Conference set for 11/9/2021 at 09:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto, Motion Hearing set for 9/13/2021 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii; conf w/ Chapman;	0.3	1075	\$322.50
Chapman, Cynthia	04/06/21	Pleadings and Service	Review Minutes for Proceedings Held before Magistrate Judge Oberto; review Scheduling Order regarding the Motion for Class Certification signed by Magistrate Judge Sheila K. Oberto on 4/6/2021; conf w/ Caddell;	0.3	850	\$255.00
Tabor, Amy	04/06/21	Motion Practice	Prepare for and attend telephonic status conference.	0.5	750	\$375.00
Tabor, Amy	04/07/21	Motion Practice	Review scheduling order; calendar deadlines.	0.1	750	\$75.00
Caddell, Michael	04/16/21	Pleadings and Service	Review multiple Sartell correspondence to and from Tabor, Caddell, Chapman, Francis, Soumilas regarding CBC retaining Cadwalader to join Tamborelli and regarding scheduling telephone conference to further discuss; review Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Chapman, Francis, Soumilas regarding scheduling telephone conference; review Pro Hac Vice Application and Proposed Order submitted by Credit Bureau Connection, Inc. for attorney Rachel Rodman to appear Pro Hac Vice;	0.6	1075	\$645.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	04/16/21	Pleadings and Service	Review multiple Sartell correspondence to and from Tabor, Caddell, Chapman, Francis, Soumilas regarding CBC retaining Cadwalader to join Tamborelli and regarding scheduling telephone conference; review Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Chapman, Francis, Soumilas regarding telephone conference; review Pro Hac Vice Application and Proposed Order submitted by Credit Bureau Connection, Inc. for attorney Rachel Rodman to appear Pro Hac Vice;	0.4	850	\$340.00
Caddell, Michael	04/19/21	Pleadings and Service	Review multiple Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Chapman, Francis, Soumilas regarding telephone conference number; T/C Team; review Clerk's Notice regarding Pro Hac Vice Application and Proposed Order submitted by Credit Bureau Connection, Inc. for attorney Rachel Rodman to appear Pro Hac Vice;	0.9	1075	\$967.50
Chapman, Cynthia	04/19/21	Pleadings and Service	Review multiple Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Chapman, Francis, Soumilas regarding telephone conference number; t/conf with Team; review Clerk's Notice regarding Pro Hac Vice Application and Proposed Order submitted by Credit Bureau Connection, Inc. for attorney Rachel Rodman to appear Pro Hac Vice;	0.9	850	\$765.00
Tabor, Amy	04/19/21	Motion Practice		0.5	750	\$375.00
Kersh, Kathy	04/19/21	Pleadings and Service	Review new NEFs and download document to network	0.2	325	\$65.00
Caddell, Michael	04/21/21	Pleadings and Service	Review Receipt number #CAE200113568 \$225.00 fbo Rachel Rodman by Cadwalader Wickersham Taft LLP on 4/21/2021;	0.1	1075	\$107.50
Kersh, Kathy	04/21/21	Pleadings and Service	Review NEF from court; update calendar entries	0.2	325	\$65.00
Caddell, Michael	04/28/21	Pleadings and Service	Review Pro Hac Vice Order Granting Application for Pro Hac Vice for Rachel Rodman;	0.1	1075	\$107.50
Chapman, Cynthia	04/28/21	Pleadings and Service	Review Pro Hac Vice Order Granting Application for Pro Hac Vice for Rachel Rodman;	0.1	850	\$85.00
Kersh, Kathy	04/28/21	Pleadings and Service	Review new filing and download same to network	0.1	325	\$32.50
Caddell, Michael	05/18/21	Written Discovery	Review multiple Chapman correspondence to and from Tabor forwarding Tamborelli correspondence regarding sending plaintiffs original responses to the written discovery;	0.3	1075	\$322.50
Chapman, Cynthia	05/18/21	Written Discovery	Prepare multiple correspondence to and from Caddell, Tabor forwarding Tamborelli correspondence regarding sending plaintiffs original responses to the written discovery;	0.1	850	\$85.00
Caddell, Michael	06/14/21	Written Discovery	Review Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Francis, Soumilas, Chapman regarding Defendant is scheduled to produce the outstanding ESI on Wednesday, June 16 and forwarding Scheduling Order and regarding advising whether Defendant will be making this production on Wednesday as anticipated and in what format(s) so we may coordinate with our eDiscovery vendor; review Rodman correspondence to Sartell, Tamborelli, Caddell, Tabor, Francis, Soumilas, Chapman, Shriver regarding scheduling telephone conference to finalize production;	0.4	1075	\$430.00
Chapman, Cynthia	06/14/21	Written Discovery	Review Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Francis, Soumilas, Chapman regarding Defendant is scheduled to produce the outstanding ESI on Wednesday, June 16 and forwarding Scheduling Order and coordinating with our eDiscovery vendor; review Rodman correspondence to Sartell, Tamborelli, Caddell, Tabor, Francis, Soumilas, Chapman, Shriver regarding scheduling telephone conference to finalize production;	0.4	850	\$340.00
Caddell, Michael	06/15/21	Pleadings and Service	Review multiple Sartell correspondence to and from Rodman, Tamborelli, Caddell, Tabor, Francis, Soumilas, Chapman, Shirver regarding scheduling telephone conference to discuss ESI production;	0.3	1075	\$322.50
Chapman, Cynthia	06/15/21	Pleadings and Service	Review multiple Sartell correspondence to and from Rodman, Tamborelli, Tabor, Francis, Soumilas, Caddell, Shirver regarding scheduling telephone conference to discuss ESI production;	0.2	850	\$170.00
Tabor, Amy	06/15/21	Written Discovery	Teleconference with Rachel Rodman regarding her retention to represent CBC - OFAC; teleconference with Jordan Sartell regarding case status.	0.5	750	\$375.00
Tabor, Amy	06/16/21	Written Discovery	Review correspondence from opposing counsel regarding discovery responses; correspond via email with Jordan Sartell and Kathy Kersh regarding discovery responses.	0.1	750	\$75.00
Tabor, Amy	06/17/21	Written Discovery	Correspond via email with Kathy Kersh and Jordan Sartell regarding processing Defendant's production.	0.2	750	\$150.00
Kersh, Kathy	06/17/21	Pleadings and Service	Download new production and production letter; extract files; emails to Lexbe about uploading docs to Lexbe; emails to Tabor about file size; upload docs to Lexbe; review responses to emails from Lexbe	1.0	325	\$325.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	06/18/21	Written Discovery	Review Defendant's production; correspond via email with Jordan Sartell and Kathy Kersh regarding Defendant's production.	0.2	750	\$150.00
Kersh, Kathy	06/18/21	Pleadings and Service	Review email from Lexbe about upload of documents; forward email to attorneys; conference with Tabor about changing name of production upload; change name of production upload; upload schema document to Lexbe	0.5	325	\$162.50
Kersh, Kathy	06/22/21	Written Discovery	Review and begin coding new document production	1.5	325	\$487.50
Kersh, Kathy	06/23/21	Written Discovery	Continue coding of defendant's new production	4.0	325	\$1,300.00
Caddell, Michael	06/24/21	Pleadings and Service	Review Notice of Appearance by Jeffrey Faucette on behalf of CBC; review Stipulation and Proposed Order for Extension of Time regarding Motion for Class Certification regarding Order, Set/Reset Deadlines and Hearings; review Kabacinski correspondence to judge chambers and all counsel forwarding the Word version of the Proposed Order recently filed at ECF 108-1; review Notice of Withdrawal of Counsel by CBC; review Tamborelli correspondence to and from Sartell, Rodman, Jeff, Caddell, Tabor, Francis, Soumilas, Chapman, Shriver forwarding Notice of Withdrawal; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	06/24/21	Pleadings and Service	Review Notice of Appearance by Jeffrey Faucette on behalf of CBC; review Stipulation and Proposed Order for Extension of Time regarding Motion for Class Certification regarding Order, Set/Reset Deadlines and Hearings; review Kabacinski correspondence to chambers and all counsel forwarding the Word version of the Proposed Order; review Notice of Withdrawal of Counsel by CBC; review Tamborelli correspondence to and from Sartell, Rodman, Jeff, Caddell, Tabor, Francis, Soumilas, Chapman, Shriver forwarding Notice of Withdrawal; conf w/ Caddell;	0.4	850	\$340.00
Kersh, Kathy	06/24/21	Pleadings and Service	Review and download new filings to network	0.2	325	\$65.00
Kersh, Kathy	06/24/21	Written Discovery	Continue coding new document production from defendant	4.8	325	\$1,560.00
Caddell, Michael	06/25/21	Pleadings and Service	Review multiple Kersh correspondence to and from Caddell, Chapman, Tabor regarding US Supreme Court OFAC opinion; prepare multiple responses; review multiple Chapman responses; review Order Modifying Scheduling Order regarding the Motion for Class Certification, Scheduling Conference December 2, 2021 at 9:45am; conf w/ Chapman;	1.2	1075	\$1,290.00
Chapman, Cynthia	06/25/21	Pleadings and Service	Review multiple Kersh correspondence to and from Caddell, Chapman, Tabor regarding US Supreme Court OFAC opinion; review multiple Caddell responses; prepare multiple responses; review Order Modifying Scheduling Order regarding the Motion for Class Certification, Scheduling Conference December 2, 2021 at 9:45am; conf w/ Caddell;	1.3	850	\$1,105.00
Kersh, Kathy	06/25/21	Pleadings and Service	Review article on US Supreme Court ruling; email to attorneys; internet research to locate Ramirez ruling; download ruling; forward same to attorneys	0.3	325	\$97.50
Kersh, Kathy	06/25/21	Written Discovery	Continue review and coding of CBC documents in Lexbe	6.3	325	\$2,047.50
Kersh, Kathy	06/28/21	Pleadings and Service	Continue coding of CBC production; review Tabor email about opt file; respond to email; send email to Lexbe and review response	4.8	325	\$1,560.00
Kersh, Kathy	06/29/21	Written Discovery	Continue review and coding of CBC production	5.2	325	\$1,690.00
Kersh, Kathy	06/30/21	Written Discovery	Continue review and coding of CBC document production	5.5	325	\$1,787.50
Tabor, Amy	07/01/21	Motion Practice	Review email correspondence from Rachel Rodman regarding scheduling of telephone conference; correspond via email with Jordan Sartell regarding scheduling of telephone conference.	0.1	750	\$75.00
Kersh, Kathy	07/01/21	Written Discovery	Review email from opposing counsel regarding discovery status	0.2	325	\$65.00
Kersh, Kathy	07/01/21	Written Discovery	Continue coding and review of CBC production	3.7	325	\$1,202.50
Kersh, Kathy	07/02/21	Written Discovery	Review documents and code key documents	0.3	325	\$97.50
Kersh, Kathy	07/06/21	Pleadings and Service	Review email from cocounsel; create two new users in Lexbe and add permissions for Kang case; review Lexbe manual on adding users; respond to email from co-counsel	0.5	325	\$162.50
Kersh, Kathy	07/09/21	Pleadings and Service	Review email from Sartell; create Levin as user in Lexbe; send email to Levin re: Login; add Levin to Kang case; email to Tabor regarding Levin; review response	0.4	325	\$130.00
Kersh, Kathy	07/12/21	Written Discovery	Continue coding CBC documents	4.0	325	\$1,300.00
Kersh, Kathy	07/13/21	Pleadings and Service	Continue coding CBC documents	3.5	325	\$1,137.50
Caddell, Michael	07/14/21	Pleadings and Service	Review Motion to Certify Class Re-Noticed Motion by Sung Gon Kang, Motion Hearing set for 9/27/2021 at 01:30 PM in Courtroom 2 (AWI) before District Judge Anthony W. Ishii; review Kabacinski correspondence to Judge Ishii, Francis, Soumilas, Saretell, Tabor, Caddell, Chapman, Jeff, Rodman forwarding Proposed Order in association with Plaintiff's Re-Noticed Motion for Class Certification; review Rodman correspondence to Kabacinski, Francis, Soumilas, Sartell, Tabor, Caddell, Chapman, Jeff, Shriver regarding providing an unredacted copy of today's filing;	0.8	1075	\$860.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	07/14/21	Pleadings and Service	Review Motion to Certify Class Re-Noticed Motion by Sung Gon Kang before District Judge Anthony W. Ishii; review Kabacinski correspondence to Judge Ishii, Francis, Soumilas, Saretell, Tabor, Caddell, Jeff, Rodman forwarding Proposed Order in association with Plaintiff's Re-Noticed Motion for Class Certification; review Rodman correspondence to Kabacinski, Francis, Soumilas, Sartell, Tabor, Caddell, Jeff, Shriver regarding providing an unredacted copy of today's filing;	0.7	850	\$595.00
Caddell, Michael	07/15/21	Pleadings and Service	Review Rodman correspondence to and from Kabacinski, Francis, Soumilas, Sartell, Tabor, Caddell, Chapman, Jeff, Shriver regarding providing this morning a complete, unredacted copy of Plaintiff's motion, with all exhibits; review Kabacinski correspondence to and from Rodman, Francis, Soumilas, Sartell, Tabor, Caddell, Chapman, Jeff, Shriver forwarding the unredacted versions of the brief (ECF 111-1), the Sartell Declaration (ECF111-2), Exhibits 7, 8, and 13 to the Sartell Declaration (ECF 111-10, 111-11, 111-16, respectively), as well as the unredacted version of the data attached to the Declaration of Duncan Levin (ECF111-22) (attached here as Reports Summary Final);	0.3	1075	\$322.50
Chapman, Cynthia	07/15/21	Pleadings and Service	Review Rodman correspondence to and from Kabacinski, Francis, Soumilas, Sartell, Tabor, Caddell, Chapman, Jeff, Shriver regarding providing a complete, unredacted copy of Plaintiff's motion, with all exhibits; review Kabacinski correspondence to and from Rodman, Francis, Soumilas, Sartell, Tabor, Caddell, Chapman, Jeff, Shriver forwarding the unredacted versions of the brief (ECF 111-1), the Sartell Declaration (ECF111-2), Exhibits 7, 8, and 13 to the Sartell Declaration (ECF 111-10, 111-11, 111-16, respectively), as well as the unredacted version of the data attached to the Declaration of Duncan Levin (ECF111-22) (attached here as Reports Summary Final)	0.4	850	\$340.00
Kersh, Kathy	07/16/21	Pleadings and Service	Review and download motion for class cert and exhibits to network	0.6	325	\$195.00
Tabor, Amy	07/21/21	Motion Practice	Review class certification motion and supporting documents.	1.0	750	\$750.00
Kersh, Kathy	07/21/21	Pleadings and Service	Review email from co-counsel regarding documents recently filed under seal; download documents to network	0.2	325	\$65.00
Caddell, Michael	07/30/21	Pleadings and Service	Review Pro Hac Vice Application and Proposed Order for Timbre Shriver;	0.1	1075	\$107.50
Chapman, Cynthia	07/30/21	Pleadings and Service	Review Pro Hac Vice Application and Proposed Order for Timbre Shriver;	0.1	850	\$85.00
Caddell, Michael	08/04/21	Pleadings and Service	Prepare correspondence to and from Tabor, Sartell, Caddell, Chapman regarding counsel for both parties should be on any call to chambers; review Sartell correspondence to and from Rodman, Soumilas, Faucette, Shriver, Tabor regarding happy to join your local counsel on a call with chambers this week to get the ball rolling;	0.3	1075	\$322.50
Chapman, Cynthia	08/04/21	Pleadings and Service	Review Caddell correspondence to and from Tabor, Sartell, Chapman regarding counsel attending call to chambers; review Sartell correspondence to and from Rodman, Soumilas, Faucette, Shriver, Caddell, Tabor regarding call to chambers;	0.2	850	\$170.00
Caddell, Michael	08/09/21	Pleadings and Service	Review Order Granting Application for Pro Hac Vice for Timbre Shriver;	0.1	1075	\$107.50
Chapman, Cynthia	08/09/21	Pleadings and Service	Review Order Granting Application for Pro Hac Vice for Timbre Shriver;	0.1	850	\$85.00
Caddell, Michael	08/11/21	Pleadings and Service	Review Notices of Appearance by Rachel Rodman and Timbre Shriver;	0.1	1075	\$107.50
Chapman, Cynthia	08/11/21	Pleadings and Service	Review Notices of Appearance by Rachel Rodman and Timbre Shriver;	0.1	850	\$85.00
Caddell, Michael	08/12/21	Pleadings and Service	Review Opposition by CBC to Motion to Certify Class; conf w/ Chapman;	0.8	1075	\$860.00
Chapman, Cynthia	08/12/21	Pleadings and Service	Review Opposition by CBC to Motion to Certify Class; conf w/ Caddell;	1.0	850	\$850.00
Caddell, Michael	08/17/21	Pleadings and Service	Review Soumilas correspondence to and from Tabor, Caddell, Chapman regarding Elizabeth Laporte; respond;	0.3	1075	\$322.50
Chapman, Cynthia	08/17/21	Pleadings and Service	Review Soumilas correspondence to and from Tabor, Caddell, Chapman regarding Elizabeth Laporte; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	08/26/21	Settlement Talks and Conferences	Review Soumilas correspondence to and from Caddell, Chapman, Tabor forwarding email from Rodman regarding both CBC and Judge Cahill are available on September 21 for a remote mediation, we will confirm the date with Judge Cahill's admin and get the ball rolling; respond; conf w/ Chapman;	0.5	1075	\$537.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	08/26/21	Settlement Talks and Conferences	Review Soumilas correspondence to and from Caddell, Chapman, Tbor forwarding email from Rodman regarding both CBC and Judge Cahill are available on September 21 for a remote mediation; review Caddell response; conf w/ Caddell;	0.5	850	\$425.00
Caddell, Michael	08/30/21	Settlement Talks and Conferences	Review Schreiber correspondence to Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Tabor regarding JAMS has received a request to administer a mediation and forwarding engagement agreement documents;	0.2	1075	\$215.00
Chapman, Cynthia	08/30/21	Settlement Talks and Conferences	Review Schreiber correspondence to Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Tabor regarding JAMS has received a request to administer a mediation and forwarding engagement agreement documents;	0.2	850	\$170.00
Caddell, Michael	08/31/21	Settlement Talks and Conferences	Review Rodman correspondence to and from Schreiber, Caddell, Chapman, Tabor, Francis, Sartrell, Skaggs, Shriver, Tabor forwarding CBC executed engagement agreement for mediation; review Scheiber to and from Caddell, Chapman, Tabor, Francis, Sartell, Tabor regarding reminder to submit your signed engagement agreement and forwarding same; respond and forward executed agreement; review Schreiber correspondence to Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Tabor regarding mediation;	0.5	1075	\$537.50
Chapman, Cynthia	08/31/21	Settlement Talks and Conferences	Review Rodman correspondence to and from Schreiber, Caddell, Chapman, Tabor, Francis, Sartrell, Skaggs, Shriver, Tabor forwarding CBC executed engagement agreement for mediation; review Scheiber correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Tabor regarding engagement agreement and forwarding same; review Caddell response and executed agreement; review Schreiber correspondence to Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Tabor regarding mediation;	0.5	850	\$425.00
Caddell, Michael	09/01/21	Pleadings and Service	Review Reply to Response to Motion to Certify Class; conf w/ Chapman;	0.5	1075	\$537.50
Chapman, Cynthia	09/01/21	Pleadings and Service	Review Reply to Response to Motion to Certify Class; conf w/ Caddell;	0.6	850	\$510.00
Kersh, Kathy	09/01/21	Pleadings and Service	Review new filing and download same to network; email to Kabacynski regarding courtesy copy; review Ishii courtesy copy requirements; print copies for courtesy copy	0.2	325	\$65.00
Caddell, Michael	09/02/21	Pleadings and Service	Review Kersh correspondence to Caddell, Chapman, Tabor forwarding courtesy copy of the reply to Judge Ishii today;	0.1	1075	\$107.50
Chapman, Cynthia	09/02/21	Pleadings and Service	Review Kersh correspondence to Caddell, Chapman, Tabor forwarding courtesy copy of the reply to Judge Ishii today;	0.1	850	\$85.00
Kersh, Kathy	09/02/21	Pleadings and Service	Prepare judge's copy of reply brief; email to Kabacinski; view response to previous email; prepare judge;s copy and Fed Ex judge's copy; reew local rules on judge's copies; send email to attorneys regarding judge's copy	0.6	325	\$195.00
Caddell, Michael	09/03/21	Settlement Talks and Conferences	Prepare correspondence to and from Labbe, Tabor, Francis, Sartell regarding paying JAMS, Inc. mediation invoice;	0.3	1075	\$322.50
Chapman, Cynthia	09/03/21	Settlement Talks and Conferences	Review Caddell correspondence to and from Labbe, Tabor, Francis, Sartell regarding paying JAMS, Inc. mediation invoice;	0.2	850	\$170.00
Caddell, Michael	09/07/21	Pleadings and Service	Review Brief Letter regarding Notice of Supplemental Authority;	0.2	1075	\$215.00
Chapman, Cynthia	09/07/21	Pleadings and Service	Review Brief Letter regarding Notice of Supplemental Authority;	0.2	850	\$170.00
Kersh, Kathy	09/07/21	Pleadings and Service	Review new filing and download same to network	0.1	325	\$32.50
Tabor, Amy	09/09/21	Motion Practice	Review response to motion for class certification; review reply in support of motion for class certification.	1.0	750	\$750.00
Caddell, Michael	09/13/21	Settlement Talks and Conferences	Review Sartell correspondence to and from Schreiber, Caddell, Chapman, Tabor, Francis, Skaggs, Rodman, Shriver, Soumilas, Tabor regarding adding Soumilas to the list of attorneys representing Kang and regarding attendance at the mediation next week; review Llamas correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas, Tabor regarding provide me with a full list of attendees for this mediation; prepare correspondence to Tabor, Francis, Soumilas, Sartell, Kersh regarding working with Kersh to obtain a signed confidentiality agreement from everyone on our side, plus provide the first and last names and email addresses of all attendees for our side (I will be attending), and also make sure we have paid the necessary deposit; prepare for mediation;	1.0	1075	\$1,075.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	09/13/21	Settlement Talks and Conferences	Review Sartell correspondence to and from Schreiber, Caddell, Chapman, Tabor, Francis, Skaggs, Rodman, Shriver, Soumilas, Tabor regarding mediation next week; review Llamas correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas, Tabor regarding mediation; review Caddell correspondence to Tabor, Francis, Soumilas, Sartell, Kersh regarding confidentiality agreement;	0.4	850	\$340.00
Tabor, Amy	09/13/21	Settlement Talks and Conferences	Review email correspondence regarding preparation for mediation.	0.1	750	\$75.00
Caddell, Michael	09/14/21	Settlement Talks and Conferences	Review multiple Sartell correspondence to and from Caddell, Tabor, Chapman, Soumilas, Francis regarding scheduling telephone conference regarding the mediation; prepare multiple responses; review Tabor correspondence to and from Labbe, Caddell regarding pulling current lodestar and expenses; respond; review multiple Llamas correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas regarding Judge William Cahill would like to offer a joint pre-mediation conference call; prepare multiple responses; confs w/ Chapman; review Sartell correspondence to and from Schreiber, Caddell, Chapman, Tabor, Francis, Skaggs, Rodman, Shriver, Soumilas regarding Counsel for the parties have conferred concerning submission of their respective mediation statements, Plaintiff requires a 48-hour extension to complete his statement, and Defendant does not object to this arrangement. We plan to upload Plaintiff's final statement to JAMS Access no later than the close of business Eastern Time on Thursday afternoon, and separately, Plaintiff will submit his statement on an ex parte, confidential basis; review Schreiber correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver regarding payment is due now; respond; prepare correspondence to and from Tabor, Chapman regarding lodestar and expenses; review Kersh correspondence to and from Soumilas, Francis, Sartell, Caddell, Tabor regarding attendance at mediation; review Kersh correspondence to and from Caddell, Tabor forwarding revised list of attendees for mediation; respond; review Tabor correspondence to and from Llamas, Caddell, Chapman, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas regarding list of attendees for Plaintiff; review Kersh correspondence to and from Llamas, Caddell, Chapman, Tabor, Francis, Soumilas forwarding list of counsel attending mediation; review Llamas correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas, Schreiber, Cahill regarding confirming pre-mediation joint conference call with Judge Cahill on Thursday, September 16 at 11:30am PT; prepare for mediation;	3.5	1075	\$3,762.50
Chapman, Cynthia	09/14/21	Settlement Talks and Conferences	Review multiple Sartell correspondence to and from Caddell, Tabor, Chapman, Soumilas, Francis regarding telephone conference to prepare for mediation; review multiple Caddell responses; review Tabor correspondence to and from Labbe, Caddell regarding preparation for mediation; review Caddell response; review multiple Llamas correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas regarding Judge William Cahill would like to offer a joint pre-mediation conference call; review multiple Caddell responses; review Sartell correspondence to and from Schreiber, Caddell, Chapman, Tabor, Francis, Skaggs, Rodman, Shriver, Soumilas regarding mediation statements; review Schreiber correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver regarding payment for mediation; review Caddell response; review Caddell correspondence to and from Tabor, Chapman regarding lodestar and expenses; review Kersh correspondence to and from Soumilas, Francis, Sartell, Caddell, Tabor regarding attendance at mediation; review Kersh correspondence to and from Caddell, Tabor forwarding revised list of attendees for mediation; review Caddell response; review Tabor correspondence to and from Llamas, Caddell, Chapman, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas regarding list of attendees for Plaintiff; review Kersh correspondence to and from Llamas, Caddell, Chapman, Tabor, Francis, Soumilas forwarding list of counsel attending mediation; review Llamas correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, Skaggs, Rodman, Shriver, Soumilas, Schreiber, Cahill regarding confirming pre-mediation joint conference call with Judge Cahill on Thursday, September 16 at 11:30am PT; confs with Caddell;	1.8	850	\$1,530.00
Tabor, Amy	09/14/21	Settlement Talks and Conferences	Correspond via email with Michael Caddell, Kathy Kersh, John Soumilas, and mediator staff regarding preparation for mediation; review information from Felicia Labbe in preparation for mediation.	0.1	750	\$75.00
Kersh, Kathy	09/14/21	Settlement Talks and Conferences	Review Caddell email about mediation; prepare list of plaintiff attendees; forward list to Tabor; review response; email to co-counsel; review response; revise list of attendees and forward same to attorneys and then to JAMS mediator.	0.4	325	\$130.00
Caddell, Michael	09/15/21	Settlement Talks and Conferences	Review Schreiber correspondence forwarding Docusign copy of the confidentiality agreement prior to the mediation session; review Sartell correspondence to Soumilas, Francis, Tabor, Caddell, Chapman regarding draft Plaintiff's Mediation Memo and forwarding same; review and revise;	1.0	1075	\$1,075.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	09/15/21	Settlement Talks and Conferences	Review Schreiber correspondence forwarding Docusign copy of the confidentiality agreement prior to the mediation session; review Sartell correspondence to Soumilas, Francis, Tabor, Caddell, Chapman regarding draft Plaintiff's Mediation Memo and forwarding same;	0.2	850	\$170.00
Caddell, Michael	09/16/21	Settlement Talks and Conferences	Review multiple Soumilas correspondence to and from Sartell, Francis, Tabor, Caddell, Chapman regarding draft Plaintiff's Mediation Memo; review multiple Sartell correspondence to and from Soumilas, Francis, Tabor, Caddell, Chapman forwarding revised draft memo; prepare multiple responses; t/conf w/ team; t/conf w/ Cahill, et al.; review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Caddell, Chapman, Tabor regarding Updated Class Numbers, Mediation Memo; review Sartell correspondence to and from Schreiber, Soumilas, Francis, Caddell, Tabor, Chapman forwarding Plaintiff's Confidential, Ex Parte Mediation Memorandum;	2.3	1075	\$2,472.50
Chapman, Cynthia	09/16/21	Settlement Talks and Conferences	Review multiple Soumilas correspondence to and from Sartell, Francis, Tabor, Caddell, Chapman regarding draft Plaintiff's Mediation Memo; review multiple Sartell correspondence to and from Soumilas, Francis, Tabor, Caddell, Chapman forwarding revised draft memo; review multiple Caddell responses; t/conf w/ team; t/conf w/ Cahill, et al.; review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Caddell, Chapman, Tabor regarding Updated Class Numbers, Mediation Memo; review Sartell correspondence to and from Schreiber, Soumilas, Francis, Caddell, Tabor, Chapman forwarding Plaintiff's Confidential, Ex Parte Mediation Memorandum;	2.5	850	\$2,125.00
Tabor, Amy	09/16/21	Settlement Talks and Conferences	Review draft mediation statement; teleconference with mediator and opposing counsel in preparation for mediation.	1.5	750	\$1,125.00
Caddell, Michael	09/20/21	Settlement Talks and Conferences	Review Sartell correspondence to and from Caddell, Chapman, Tabor, Soumilas regarding setting up a Microsoft Teams meeting for tomorrow's mediation; respond; review Kang counsel confidential conference call invite; respond; review Soumilas correspondence to and from Caddell, Chapman regarding lodestar and costs; respond; prepare correspondence to and from Labbe, Chapman regarding updating lodestar; prepare correspondence to and from Soumilas, Sartell, Tabor, Chapman forwarding C&C lodestar and expenses; review Rodman correspondence to and from Sartell, Shriver, Soumilas, Francis, Caddell, Chapman, Tabor forwarding CBC's mediation statement and regarding providing the non-confidential portion of Kang's mediation statement prior to our meeting; prepare correspondence to and from Soumilas, Sartell, Tabor, Chapman regarding memo; prepare for mediation; confs/ with Chapman;	2.5	1075	\$2,687.50
Chapman, Cynthia	09/20/21	Settlement Talks and Conferences	Review Sartell correspondence to and from Caddell, Chapman, Tabor, Soumilas regarding setting up a Microsoft Teams meeting for tomorrow's mediation; review Caddell response; review Kang counsel confidential conference call invite; review Caddell response; review Soumilas correspondence to and from Caddell, Chapman regarding lodestar and costs; review Caddell response; review Caddell correspondence to and from Labbe, Chapman regarding updating lodestar; review Caddell correspondence to and from Soumilas, Sartell, Tabor, Chapman forwarding C&C lodestar and expenses; review Rodman correspondence to and from Sartell, Shriver, Soumilas, Francis, Caddell, Chapman, Tabor forwarding CBC's mediation statement and regarding providing the non-confidential portion of Kang's mediation statement prior to meeting; review Caddell correspondence to and from Soumilas, Sartell, Tabor, Chapman regarding memo; prepare for mediation; confs w/ Caddell;	2.2	850	\$1,870.00
Caddell, Michael	09/21/21	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Caddell, Chapman, Tabor regarding redacted version of our mediation memo and forwarding same; review Soumilas correspondence to and from Sartell, Rodman, Shriver, Francis, Caddell, Chapman, Tabor regarding we need the precise class size, and in particular the reports with OFAC hits furnished between when Defendant's production ended in 2019 and the present; respond; review Soumilas correspondence to and from Caddell, Sartell, Francis, Chapman, Tabor regarding let's discuss at 9Pacific; review Sartell correspondence to and from Caddell, Chapman, Soumilas, Bennett forwarding zoom link for mediation; prepare correspondence to and from Schreiber, Sartell, Soumilas, Francis, Tabor, Chapman regarding need the link to the zoom for the mediation and passcode; review Sartell correspondence to and from Caddell, Tabor, Soumilas forwarding CBC insurance document; attend mediation; conf w/ Chapman;	8.2	1075	\$8,815.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	09/21/21	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Caddell, Chapman, Tabor regarding redacted version of our mediation memo and forwarding same; review Soumilas correspondence to and from Sartell, Rodman, Shriver, Francis, Caddell, Chapman, Tabor regarding class size, OFAC hits furnished between when Defendant's production ended in 2019 and the present; review Caddell response; review Soumilas correspondence to and from Caddell, Sartell, Francis, Chapman, Tabor regarding conference; review Sartell correspondence to and from Caddell, Chapman, Soumilas, Bennett forwarding zoom link for mediation; review Caddell correspondence to and from Schreiber, Sartell, Soumilas, Francis, Tabor, Chapman regarding need the link to the zoom for the mediation and passcode; review Sartell correspondence to and from Caddell, Tabor, Soumilas forwarding CBC insurance document; confs w/ Caddell;	2.8	850	\$2,380.00
Tabor, Amy	09/21/21	Settlement Talks and Conferences	Prepare for and attend mediation.	6.5	750	\$4,875.00
Caddell, Michael	09/22/21	Pleadings and Service	Review Minute Order signed by District Judge Anthony W. Ishii on 9/22/2021: (Text Only Entry) The Court has deemed the Motion to Certify, noticed for hearing on 9/27/2021, before District Judge Anthony W. Ishii, suitable for decision Without oral argument pursuant to Local Rule 230(g), as such, the hearing on same is Vacated and the motion will be taken under submission as of that date;	0.1	1075	\$107.50
Chapman, Cynthia	09/22/21	Pleadings and Service	Review Minute Order regarding Motion to Certify hearing signed by District Judge Anthony W. Ishii on 9/22/2021	0.1	850	\$85.00
Caddell, Michael	11/09/21	Pleadings and Service	Review Minute Order signed by Magistrate Judge Sheila K. Oberto on 11/9/2021: (Text Only Entry) Due to the pending motion(s), the Initial Scheduling Conference currently set for 12/2/2021, is Continued to 7/21/2022, at 9:30 AM, in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto, the parties Shall file their joint scheduling report 7 days prior to the conference; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	11/09/21	Pleadings and Service	Review Minute Order regarding Initial Scheduling Conferece signed by Magistrate Judge Sheila K. Oberto on 11/9/2021; conf w/ Caddell;	0.2	850	\$170.00
Caddell, Michael	12/15/21	Pleadings and Service	Review Schreiber correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, et al regarding checking in to see if there is anything further you need from Judge Cahill before I close the file on this matter;	0.2	1075	\$215.00
Chapman, Cynthia	12/15/21	Settlement Talks and Conferences	Review Schreiber correspondence to and from Caddell, Chapman, Tabor, Francis, Sartell, et al regarding mediation and closing file;	0.1	850	\$85.00
Caddell, Michael	03/04/22	Pleadings and Service	Review Order on Plaintiff's Motion for Class Certification; review Kersh correspondence to team forwarding Order Granting in Part Motion for Class Certification; review Tabor correspondence to and from Sartell, Caddell, Chapman, Soumilas regarding same; respond; review Chapman response; conf w/ Chapman;	1.2	1075	\$1,290.00
Chapman, Cynthia	03/04/22	Pleadings and Service	Review Order on Plaintiff's Motion for Class Certification; review Kersh correspondence to team forwarding Order Granting in Part Motion for Class Certification; review Tabor correspondence to and from Sartell, Caddell, Chapman, Soumilas regarding same; review Caddell response; prepare response; conf w/ Caddell;	1.3	850	\$1,105.00
Tabor, Amy	03/04/22	Motion Practice	Review order granting class certification; correspond via email with co-counsel regarding class certification order and next steps.	0.5	750	\$375.00
Kersh, Kathy	03/04/22	Pleadings and Service	Review Notice of Electronic Filing; download order to network; review email from Chapman and forward order to attorneys	0.1	325	\$32.50
Caddell, Michael	03/07/22	Pleadings and Service	Prepare correspondence to Sartell, Tabor, Chapman, Soumilas, Francis regarding the size of the two proposed classes;	0.2	1075	\$215.00
Chapman, Cynthia	03/07/22	Pleadings and Service	Review Caddell correspondence to Sartell, Tabor, Chapman, Soumilas, Francis regarding the size of the two proposed classes;	0.1	850	\$85.00
Caddell, Michael	03/10/22	Pleadings and Service	Review Sartell correspondence to and from Caddell, Tabor, Chapman, Soumilas, Francis regarding the size of the two proposed classes; respond;	0.3	1075	\$322.50
Chapman, Cynthia	03/10/22	Pleadings and Service	Review Sartell correspondence to and from Caddell, Tabor, Chapman, Soumilas, Francis regarding the size of the two proposed classes; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	03/23/22	Pleadings and Service	Review Sartell correspondence to Rodman, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell forwarding class list correspondence and spreadsheet;	0.2	1075	\$215.00
Chapman, Cynthia	03/23/22	Pleadings and Service	Review Sartell correspondence to Rodman, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell forwarding class list correspondence and spreadsheet;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	03/23/22	Motion Practice	Teleconference with Jordan Sartell regarding identifying class members; review and comment on draft letter to opposing counsel.	0.2	750	\$150.00
Caddell, Michael	03/28/22	Written Discovery	Review Rodman correspondence to and from Sartell, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference to discuss prior production;	0.3	1075	\$322.50
Chapman, Cynthia	03/28/22	Written Discovery	Review Rodman correspondence to and from Sartell, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference to discuss prior production;	0.1	850	\$85.00
Caddell, Michael	03/29/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Soumilas Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference regarding prior production;	0.2	1075	\$215.00
Chapman, Cynthia	03/29/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Soumilas Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference regarding prior production;	0.1	850	\$85.00
Caddell, Michael	03/30/22	Written Discovery	Review Rodman correspondence to and from Sartell, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference on Monday;	0.2	1075	\$215.00
Chapman, Cynthia	03/30/22	Written Discovery	Review Rodman correspondence to and from Sartell, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference on Monday;	0.1	850	\$85.00
Caddell, Michael	04/04/22	Written Discovery	Review multiple Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference today at 2:30pm EST;	0.2	1075	\$215.00
Chapman, Cynthia	04/04/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Tabor, Chapman, Caddell regarding scheduling telephone conference today at 2:30pm EST;	0.1	850	\$85.00
Caddell, Michael	04/05/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Tabor, Caddell, Chapman forwarding Microsoft Teams meeting information to discuss Post-Class Certification Discussion; review Sartell correspondence to Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding Class List Conversation; t/conf w/ Team;	0.6	1075	\$645.00
Chapman, Cynthia	04/05/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Soumilas, Francis, Tabor, Caddell, Chapman forwarding Microsoft Teams meeting information to discuss Post-Class Certification Discussion; review Sartell correspondence to Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding Class List Conversation; t/conf w/ Team;	0.5	850	\$425.00
Caddell, Michael	04/20/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding class list conversation and the status of CBC's efforts to prepare the class list and produce class members' reports in native HTML format;	0.4	1075	\$430.00
Chapman, Cynthia	04/20/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding class list conversation and the status of CBC's efforts to prepare the class list and produce class members' reports in native HTML format;	0.2	850	\$170.00
Caddell, Michael	04/28/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding needing update from your client;	0.2	1075	\$215.00
Chapman, Cynthia	04/28/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding needing update;	0.1	850	\$85.00
Caddell, Michael	05/01/22	Written Discovery	Review Rodman correspondence to Sartell, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding two updates;	0.2	1075	\$215.00
Chapman, Cynthia	05/01/22	Written Discovery	Review Rodman correspondence to Sartell, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding two updates;	0.1	850	\$85.00
Caddell, Michael	05/02/22	Written Discovery	Review Sartell correspondence Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding two updates;	0.2	1075	\$215.00
Chapman, Cynthia	05/02/22	Written Discovery	Review Sartell correspondence Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding two updates;	0.1	850	\$85.00
Caddell, Michael	05/09/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding class list conversation;	0.2	1075	\$215.00
Chapman, Cynthia	05/09/22	Written Discovery	Review Sartell correspondence to and from Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding class list conversation;	0.2	850	\$170.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	05/11/22	Written Discovery	Review Rodman correspondence to and from Sartell, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding class member data;	0.2	1075	\$215.00
Chapman, Cynthia	05/11/22	Written Discovery	Review Rodman correspondence to and from Sartell, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding class member data;	0.2	850	\$170.00
Caddell, Michael	05/12/22	Written Discovery	Review Sartell correspondence to Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding the representation and the timeline;	0.1	1075	\$107.50
Chapman, Cynthia	05/12/22	Written Discovery	Review Sartell correspondence to Rodman, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis regarding the representation and the timeline;	0.1	850	\$85.00
Kersh, Kathy	06/23/22	Pleadings and Service	Review emails from Tabor; download new document production to network; contact Lexbe and upload documents to Lexbe secure link	0.4	325	\$130.00
Kersh, Kathy	06/24/22	Pleadings and Service	Review email from Tabor; review production loaded into Lexbe; email to Tabor regarding status of load;	1.0	325	\$325.00
Tabor, Amy	06/27/22	Written Discovery	Teleconference with Jonathan Jaffe and Jordan Sartell regarding information produced related to identification of class members; teleconference with Jordan Sartell regarding notice plan.	1.0	750	\$750.00
Kersh, Kathy	06/27/22	Written Discovery	Review 6th production in Lexbe; email to Tabor; review response; locate spreadsheets for Tabor; email to Jaffe about spreadsheets; upload spreadsheets to Dropbox folder and share with Jaffe; review Tabor emails to Sartell about Jaffe	0.5	325	\$162.50
Caddell, Michael	07/07/22	Written Discovery	Review Tabor correspondence to and from Sartell, Caddell, Chapman regarding scheduling telephone conference tomorrow;	0.1	1075	\$107.50
Chapman, Cynthia	07/07/22	Written Discovery	Review Tabor correspondence to and from Sartell, Caddell, Chapman regarding telephone conference tomorrow;	0.1	850	\$85.00
Tabor, Amy	07/07/22	Motion Practice	Correspond via email with Jordan Sartell, Michael Caddell, and Cynthia Chapman regarding preparation of status report; review information received from Jonathan Jaffe.	0.1	750	\$75.00
Caddell, Michael	07/08/22	Written Discovery	Review Labbe correspondence forwarding Jaffe invoice; respond; prepare multiple correspondence to and from Tabor, Sartell, Chapman regarding telephone conference; t/conf w/ Team; review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver regarding upcoming case management conference and forwarding draft joint status report and proposed scheduling order; prepare correspondence to and from Sartell, Tabor, Chapman, Soumilas, Francis regarding Rodman draft proposed scheduling order;	1.0	1075	\$1,075.00
Chapman, Cynthia	07/08/22	Written Discovery	Review Labbe correspondence forwarding Jaffe invoice; review Caddell response; review multiple correspondence from Caddell to and from Tabor, Sartell, Chapman regarding telephone conference; t/conf Team; review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver regarding upcoming case management conference and forwarding draft joint status report and proposed scheduling order; prepare correspondence to and from Sartell, Tabor, Chapman, Soumilas, Francis regarding Rodman draft proposed scheduling order;+D735	0.6	850	\$510.00
Tabor, Amy	07/08/22	Motion Practice	Teleconference with Jordan Sartell and Micheal Caddell regarding proposed schedule; review and comment on draft Joint Status Report from Rachel Rodman.	1.5	750	\$1,125.00
Caddell, Michael	07/11/22	Settlement Talks and Conferences	Review Tabor correspondence to and from Caddell, Sartell, Chapman, Soumilas, Francis, MacKenzie regarding revised schedule and forwarding same; respond; review Tabor correspondence to Caddell, Sartell, Chapman, Soumilas, Francis, MacKenzie regarding revised joint status report and proposed scheduling order and last Joint Status Report, and proposed dates ALCS and/or Frank Barkan;	0.7	1075	\$752.50
Chapman, Cynthia	07/11/22	Settlement Talks and Conferences	Review Tabor correspondence to and from Caddell, Sartell, Chapman, Soumilas, Francis, MacKenzie regarding revised schedule and forwarding same; review Caddell response; review Tabor correspondence to Caddell, Sartell, Chapman, Soumilas, Francis, MacKenzie regarding revised joint status report and proposed scheduling order and last Joint Status Report, and proposed dates ALCS and/or Frank Barkan;	0.5	850	\$425.00
Tabor, Amy	07/11/22	Motion Practice	Revise draft joint status report; outline discovery and motion tasks.	0.7	750	\$525.00
Caddell, Michael	07/12/22	Settlement Talks and Conferences	Prepare correspondence to and from Tabor, Sartell, Chapman, Soumilas, Francis, MacKenzie regarding joint status report and proposed scheduling order; review MacKenzie correspondence to and from Tabor, Caddell, Sartell, Chapman, Soumilas, Francis regarding proposal from ALCS and regarding Frank Barkan and a notice plan section;	0.6	1075	\$645.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	07/12/22	Settlement Talks and Conferences	Review Caddell correspondence to and from Tabor, Sartell, Chapman, Soumilas, Francis, MacKenzie regarding joint status report and proposed scheduling order; review MacKenzie correspondence to and from Tabor, Caddell, Sartell, Chapman, Soumilas, Francis regarding proposal from ALCS and regarding Frank Barkan and a notice plan section;	0.7	850	\$595.00
Tabor, Amy	07/12/22	Motion Practice	Review procedural history; draft insert for status report regarding discovery taken to date; correspond via email with Kathy Kersh regarding discovery taken to date.	1.5	750	\$1,125.00
Kersh, Kathy	07/12/22	Written Discovery	Review Tabor email; begin drafting list of discovery response and service dates; begin drafting paragraph in joint status report regarding discovery; respond to Tabor email; email draft of joint status report to Tabor	1.5	325	\$487.50
Caddell, Michael	07/13/22	Pleadings and Service	Review Tabor correspondence to and from Caddell, Sartell, Chapman, Soumilas, Francis, MacKenzie, Kersh regarding revised draft joint status report and forwarding same; prepare multiple correspondence to and from Tabor, Chapman regarding changes to joint status report and forwarding same; review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver regarding draft status report and proposed scheduling order;	0.6	1075	\$645.00
Chapman, Cynthia	07/13/22	Pleadings and Service	Review Tabor correspondence to and from Caddell, Sartell, Chapman, Soumilas, Francis, MacKenzie, Kersh regarding revised draft joint status report and forwarding same; review multiple Caddell correspondence to and from Tabor, Chapman regarding changes to joint status report and forwarding same; review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver regarding draft status report and proposed scheduling order;	0.5	850	\$425.00
Tabor, Amy	07/13/22	Motion Practice	Revise draft Joint Statement; correspond via email with Jonathan Jaffee regarding analysis of class member data; review email correspondence from opposing counsel regarding joint statement.	1.0	750	\$750.00
Kersh, Kathy	07/13/22	Written Discovery	Review joint status report and revise paragraph regarding discovery dates; email draft to Tabor; review emails from attorneys regarding joint status report.	1.0	325	\$325.00
Caddell, Michael	07/14/22	Pleadings and Service	Review Shriver correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Faucette regarding revisions to the joint status report and proposed schedule and forwarding same; review multiple Sartell correspondence to and from Caddell, Tabor, Chapman, Soumilas, Francis regarding Shriver revisions to status report and proposed schedule; prepare multiple responses; review Sartell correspondence to and from Tabor, Caddell, Chapman, Soumilas, Francis forwarding revised joint status report and schedule; respond; review Sartell correspondence to and from Shriver, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Facuette forwarding revised joint status report and schedule and regarding do not believe that additional time is necessary in this case, which is nearly 4 years old; review Rodman correspondence to and from Sartell, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding scheduling telephone conference today at 7pm; review Joint Status Report;	1.2	1075	\$1,290.00
Chapman, Cynthia	07/14/22	Pleadings and Service	Review Shriver correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Faucette regarding revisions to the joint status report and proposed schedule; review multiple Sartell correspondence to and from Caddell, Tabor, Chapman, Soumilas, Francis regarding Shriver revisions to status report and proposed schedule; review multiple Caddell responses; review Sartell correspondence to and from Tabor, Caddell, Chapman, Soumilas, Francis forwarding revised joint status report and schedule; review Caddell response; review Sartell correspondence to and from Shriver, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Facuette forwarding revised joint status report and schedule and regarding no additional necessary as the case is nearly 4 years old; review Rodman correspondence to and from Sartell, Shriver, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding scheduling telephone conference today; review Joint Status Report;	0.8	850	\$680.00
Tabor, Amy	07/14/22	Motion Practice	Teleconference with Jordan Sartell regarding status report; review and comment on draft status report.	0.5	750	\$375.00
Caddell, Michael	07/15/22	Pleadings and Service	Review MacKenzie correspondence to and from Tabor, Caddell, Sartell forwarding an estimate from Continental DataLogix; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	07/15/22	Pleadings and Service	Review MacKenzie correspondence to and from Tabor, Caddell, Sartell forwarding an estimate from Continental DataLogix; conf w/ Caddell;	0.4	850	\$340.00
Kersh, Kathy	07/15/22	Pleadings and Service	download new filing to network; review Oberto policy on courtesy copies and respond to Tabor email	0.1	325	\$32.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	07/18/22	Pleadings and Service	Review Minute Order - The parties are Granted permission to appear telephonically for the upcoming Scheduling Conference set on 7/19/2022 before Judge Oberto by dialing 888-557-8511 access code 6208204), at the time of the hearing; review multiple Sartell correspondence to and from Tabor, Caddell, Chapman, Francis, Soumilas, Kersh, Kabacinski regarding status date and time; respond; review multiple Sartell correspondence to and from Kusamura, Tabor, Caddell, Soumilas, Francis, Chapman, Kabacinski, Faucette, Shriver, Rodman regarding same; review Minute Order - the parties are Granted permission to appear telephonically for the upcoming Scheduling Conference set on 7/21/2022 before Judge Oberto by dialing 888-557-8511 (access code 6208204), at the time of the hearing;	0.6	1075	\$645.00
Chapman, Cynthia	07/18/22	Pleadings and Service	Review Minute Order upcoming Scheduling Conference set on 7/19/2022; review multiple Sartell correspondence to and from Tabor, Caddell, Chapman, Francis, Soumilas, Kersh, Kabacinski regarding status date and time; review Caddell response; review multiple Sartell correspondence to and from Kusamura, Tabor, Caddell, Soumilas, Francis, Chapman, Kabacinski, Faucette, Shriver, Rodman regarding same;	0.4	850	\$340.00
Kersh, Kathy	07/18/22	Pleadings and Service	Review emails from attorneys; review Minute Order from court and download same to network; update calendar	0.1	325	\$32.50
Caddell, Michael	07/21/22	Pleadings and Service	Attend Status Conference; review Minutes (Text Only) for proceedings held telephonically before Magistrate Judge Sheila K. Oberto: Scheduling Conference held on 7/21/2022 - Scheduling Order to follow; conf w/ Chapman;	0.7	1075	\$752.50
Chapman, Cynthia	07/21/22	Pleadings and Service	Attend Status Conference; review Minutes (Text Only) for proceedings held telephonically before Magistrate Judge Sheila K. Oberto: Scheduling Conference held on	0.7	850	\$595.00
Caddell, Michael	07/22/22	Pleadings and Service	7/21/2022; conf w/ Caddell;	0.2	1075	\$215.00
Chapman, Cynthia	07/22/22	Settlement Talks and Conferences	Review Scheduling Order - Deadline to Provide Proposed Settlement Conference Dates 11/01/2022, Pretrial Conference set for 08/30/2023 at 10am, Jury Trial set for 10/24/2023 at 8:30am;	0.2	850	\$170.00
Tabor, Amy	07/22/22	Motion Practice	Review scheduling order; correspond via email with Jordan Sartell regarding scheduling conference; calendar deadlines; review local rules.	0.5	750	\$375.00
Kersh, Kathy	07/22/22	Pleadings and Service	Review and download new order to network; update calendar entries	0.1	325	\$32.50
Caddell, Michael	08/02/22	Written Discovery	Review multiple Labbe correspondence forwarding Jaffe invoice; respond; review multiple Chapman responses; review Chapman correspondence to and from Labbe, Caddell, Tabor regarding expenses;	0.5	1075	\$537.50
Chapman, Cynthia	08/02/22	Written Discovery	Review Labbe correspondence forwarding Jaffe invoice; review Caddell response; prepare multiple responses; prepare correspondence to and from Labbe, Caddell, Tabor regarding expenses; analysis regarding expenses; confs with Labbe regarding expenses;	1.4	850	\$1,190.00
Caddell, Michael	08/03/22	Pleadings and Service	Review Labbe correspondence to and from Chapman, Caddell, Tabor regarding hard case expenses and forwarding chart on same;	0.3	1075	\$322.50
Chapman, Cynthia	08/03/22	Pleadings and Service	Review Labbe correspondence to and from Chapman, Caddell, Tabor regarding hard case expenses and forwarding chart on same;	0.2	850	\$170.00
Caddell, Michael	08/07/22	Pleadings and Service	Prepare correspondence to Labbe, Chapman, Tabor regarding expenses;	0.2	1075	\$215.00
Chapman, Cynthia	08/07/22	Pleadings and Service	Review Caddell correspondence to Labbe, Chapman, Tabor regarding expenses;	0.1	850	\$85.00
Caddell, Michael	08/08/22	Pleadings and Service	Review multiple Labbe correspondence to and from Caddell, Chapman, Tabor regarding expenses;	0.3	1075	\$322.50
Chapman, Cynthia	08/08/22	Pleadings and Service	Review multiple Labbe correspondence to and from Caddell, Chapman, Tabor regarding expenses;	0.2	850	\$170.00
Caddell, Michael	08/24/22	Pleadings and Service	Review Sartell correspondence to and from Soumilas, Francis, Tabor, Caddell, Chapman, MacKenzie, Kersh regarding Class notice proposal and draft notice and forwarding Barkan's bid for notice and admin;	0.4	1075	\$430.00
Chapman, Cynthia	08/24/22	Pleadings and Service	Review Sartell correspondence to and from Soumilas, Francis, Tabor, Caddell, Chapman, MacKenzie, Kersh regarding Class notice proposal and draft notice and forwarding Barkan's bid for notice and admin;	0.4	850	\$340.00
Caddell, Michael	08/25/22	Pleadings and Service	Review Tabor correspondence to and from Sartell, Soumilas, Francis, Tabor, Caddell, Chapman, MacKenzie, Kersh regarding Class notice proposal and draft notice and forwarding Barkan's bid for notice and admin; respond;	0.4	1075	\$430.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	08/25/22	Pleadings and Service	Review Tabor correspondence to and from Sartell, Soumilas, Francis, Tabor, Caddell, Chapman, MacKenzie, Kersh regarding Class notice proposal and draft notice and forwarding Barkan's bid for notice and admin; review Caddell response;	0.3	850	\$255.00
Tabor, Amy	08/25/22	Motion Practice	Review and comment on draft notice to class members; review and comment on draft notice administration proposal; correspond via email with Jordan Sartell, John Soumilas, and Michael Caddell regarding notice and administration.	1.0	750	\$750.00
Caddell, Michael	08/26/22	Pleadings and Service	Review MacKenzie correspondence to and from Sartell, Caddell, Tabor, Soumilas, Francis, Chapman, Kersh forwarding revised long form notice;	0.3	1075	\$322.50
Chapman, Cynthia	08/26/22	Pleadings and Service	Review MacKenzie correspondence to and from Sartell, Caddell, Tabor, Soumilas, Francis, Chapman, Kersh forwarding revised long form notice;	0.4	850	\$340.00
Caddell, Michael	08/31/22	Written Discovery	Review Labbe correspondence to and from Caddell, Chapman, Tabor regarding Jaffe invoice; respond;	0.2	1075	\$215.00
Chapman, Cynthia	08/31/22	Written Discovery	Review Labbe correspondence to and from Caddell, Chapman, Tabor regarding Jaffe invoice; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	09/01/22	Written Discovery	Review Rodman correspondence to Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver forwarding Notice of Subpoena and regarding scheduling meet and confer next week regarding proposed notice to class members and discovery of absent class members;	0.3	1075	\$322.50
Chapman, Cynthia	09/01/22	Written Discovery	Review Rodman correspondence to Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver forwarding Notice of Subpoena and regarding scheduling meet and confer next week regarding proposed notice to class members and discovery of absent class members;	0.2	850	\$170.00
Kersh, Kathy	09/02/22	Pleadings and Service	Review subpoena from defendant; download subpoena to network	0.1	325	\$32.50
Caddell, Michael	09/07/22	Written Discovery	Review multiple Labbe correspondence to and from Caddell, Chapman, Tabor regarding Jaffe invoice and regarding case expenses; review multiple Chapman responses; review Rodman correspondence to Sartell, Caddell, Tabor, Chapman, Somilas, Francis, Faucette, Shriver regarding providing times to meet and confer;	0.4	1075	\$430.00
Chapman, Cynthia	09/07/22	Written Discovery	Review multiple Labbe correspondence to and from Caddell, Chapman, Tabor regarding Jaffe invoice and regarding case expenses; prepare multiple responses; review Rodman correspondence to Sartell, Caddell, Tabor, Chapman, Somilas, Francis, Faucette, Shriver regarding providing times to meet and confer;	0.7	850	\$595.00
Caddell, Michael	09/08/22	Pleadings and Service	Review Francis correspondence to and from Rodman, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver regarding scheduling meet and confer next Tuesday;	0.3	1075	\$322.50
Chapman, Cynthia	09/08/22	Pleadings and Service	Review Francis correspondence to and from Rodman, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver regarding scheduling meet and confer next Tuesday;	0.1	850	\$85.00
Caddell, Michael	09/09/22	Pleadings and Service	Review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver forwarding Subpoena Notices for Crowley, Ed Martin, First Auto, Von Housen; conf w/ Chapman;	0.3	1075	\$322.50
Chapman, Cynthia	09/09/22	Pleadings and Service	Review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver forwarding Subpoena Notices for Crowley, Ed Martin, First Auto, Von Housen; conf w/ Caddell;	0.4	850	\$340.00
Caddell, Michael	09/12/22	Pleadings and Service	Review Rodman correspondence to Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver regarding requests and forwarding draft interrogatories to class members;	0.3	1075	\$322.50
Chapman, Cynthia	09/12/22	Pleadings and Service	Review Rodman correspondence to Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver regarding requests and forwarding draft interrogatories to class members;	0.2	850	\$170.00
Caddell, Michael	09/13/22	Pleadings and Service	Review multiple Francis correspondence to and from Rodman, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver regarding rescheduling meet and confer; review Shriver correspondence to and from Francis, Rodman, Sartell, Caddell, Tabor, Chapman, Soumilas forwarding dial-in number for meet and confer; review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver forwarding Subpoena Notices for Lithia, McGovern, and Fletcher Jones;	0.5	1075	\$537.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	09/13/22	Pleadings and Service	Review multiple Francis correspondence to and from Rodman, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver regarding rescheduling meet and confer; review Shriver correspondence to and from Francis, Rodman, Sartell, Caddell, Tabor, Chapman, Soumilas forwarding dial-in number for meet and confer; review Rodman correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver forwarding Subpoena Notices for Lithia, McGovern, and Fletcher Jones;	0.2	850	\$170.00
Tabor, Amy	09/13/22	Depositions	Review deposition subpoenas; calendar deadlines; review and comment on draft class notice website.	0.2	750	\$150.00
Caddell, Michael	09/15/22	Pleadings and Service	Review Tabor correspondence to and from Caddell, Chapman regarding telephone conference with Rodman; prepare correspondence to and from Tabor, Francis, Chapman regarding meet and confer;	0.3	1075	\$322.50
Chapman, Cynthia	09/15/22	Pleadings and Service	Review Tabor correspondence to and from Caddell, Chapman regarding telephone conference with Rodman; review Caddell correspondence to and from Tabor, Francis, Chapman regarding meet and confer;	0.2	850	\$170.00
Tabor, Amy	09/15/22	Written Discovery	Teleconference with Jim Francis, Jordan Sartell, Rachel Rodman, and Timbre Shriver regarding third-party discovery, proposed interrogatories to class members, and possible settlement; prepare email to Michael Caddell and Cynthia Chapman regarding conference with opposing counsel; review email correspondence between Michael Caddell and Jim Francis regarding upcoming depositions.	1.0	750	\$750.00
Caddell, Michael	09/26/22	Pleadings and Service	Review Sartell correspondence to and from Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver regarding Defendant's subpoenas; review Shriver correspondence to Sartell, Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding McGovern and Housen has been served;	0.4	1075	\$430.00
Chapman, Cynthia	09/26/22	Pleadings and Service	Review Sartell correspondence to and from Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette, Shriver regarding Defendant's subpoenas;	0.1	850	\$85.00
Caddell, Michael	09/27/22	Depositions	Review Sartell correspondence to and from Shriver, Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding McGovern and Housen being served; review Tiong correspondence to Francis, Soumilas, Sartell, Caddell, Tabor, Chapman, Jeff, Rodman, Shriver, Gilman forwarding Lithia Motors, Inc.'s Objections to Defendant Credit Bureau Connection, Inc.'s Subpoena to Testify at a Deposition in a Civil Action and to Produce Documents;	0.4	1075	\$430.00
Chapman, Cynthia	09/27/22	Depositions	Review Sartell correspondence to and from Shriver, Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding McGovern and Housen being served; review Tiong correspondence to Francis, Soumilas, Sartell, Caddell, Tabor, Chapman, Jeff, Rodman, Shriver, Gilman forwarding Lithia Motors, Inc.'s Objections to Defendant Credit Bureau Connection, Inc.'s Subpoena to Testify at a Deposition in a Civil Action and to Produce Documents;	0.3	850	\$255.00
Caddell, Michael	09/29/22	Depositions	Review Baca correspondence to Francis, Soumilas, Sartell, Caddell, Tabor, Chapman, Rodman, Tamborelli, Jeff, Shriver, Brophy forwarding Non-Party Fletcher Jones Management Group, Inc.'s Objections to Defendant's Subpoena to Testify at a Deposition in a Civil Action;	0.2	1075	\$215.00
Chapman, Cynthia	09/29/22	Depositions	Review Baca correspondence to Francis, Soumilas, Sartell, Caddell, Tabor, Chapman, Rodman, Tamborelli, Jeff, Shriver, Brophy forwarding Non-Party Fletcher Jones Management Group, Inc.'s Objections to Defendant's Subpoena to Testify at a Deposition in a Civil Action;	0.1	850	\$85.00
Tabor, Amy	10/05/22	Written Discovery	Review objections to third-party subpoena; forward same to Kathy Kersh.	0.1	750	\$75.00
Caddell, Michael	10/07/22	Pleadings and Service	Review Rodman correspondence to Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver, Newman forwarding Notice of Subpoena of Canoga Imports with is intended to replace the subpoena we served on First Auto Group;	0.1	1075	\$107.50
Chapman, Cynthia	10/07/22	Pleadings and Service	Review Rodman correspondence to Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver, Newman forwarding Notice of Subpoena of Canoga Imports with is intended to replace the subpoena we served on First Auto Group;	0.1	850	\$85.00
Caddell, Michael	10/10/22	Pleadings and Service	Review Sartell correspondence to and from Francis, Caddell, Tabor, Soumilas, Chapman regarding Norm Reeves Subpoena and forwarding Rule 45 Subpoena Conant Auto Retail Group;	0.2	1075	\$215.00
Chapman, Cynthia	10/10/22	Pleadings and Service	Review Sartell correspondence to and from Francis, Caddell, Tabor, Soumilas, Chapman regarding Norm Reeves Subpoena and forwarding Rule 45 Subpoena Conant Auto Retail Group;	0.2	850	\$170.00
Caddell, Michael	10/12/22	Pleadings and Service	Review Pro Hac Vice Application and Proposed Order for Jeffrey Faucette;	0.1	1075	\$107.50
Chapman, Cynthia	10/12/22	Pleadings and Service	Review Pro Hac Vice Application and Proposed Order for Jeffrey Faucette;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	10/14/22	Written Discovery	Review Sartell correspondence to and from Shriver, Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding deposition of Crowley Car Company; review link to documents from McGovern Auto Group; review Motion for Limited Discovery - Motion Hearing Set for 11/9/2022 at 9:30am; review Newman correspondence to and from Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Rodman, Shriver, Faucette regarding joint statement regarding discovery disagreement; prepare correspondence to Sartell, Francis, Tabor, Soumilas, Chapman regarding Norm Reeves subpoena;	0.8	1075	\$860.00
Chapman, Cynthia	10/14/22	Written Discovery	Review Sartell correspondence to and from Shriver, Rodman, Caddell, Tabor, Chapman, Soumilas, Francis, Faucette regarding deposition of Crowley Car Company; review link to documents from McGovern Auto Group; review Motion for Limited; review Newman correspondence to and from Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Rodman, Shriver, Faucette regarding joint statement regarding discovery disagreement; review Caddell correspondence to Sartell, Francis, Tabor, Soumilas, Chapman regarding Norm Reeves subpoena;	0.5	850	\$425.00
Kersh, Kathy	10/14/22	Pleadings and Service	Download new filing to network; update calendar	0.1	325	\$32.50
Caddell, Michael	10/17/22	Depositions	Review Sartell correspondence to and from Caddell, Francis, Tabor, Soumilas, Chapman regarding Norm Reeves subpoena;	0.3	1075	\$322.50
Chapman, Cynthia	10/17/22	Depositions	Review Sartell correspondence to and from Caddell, Francis, Tabor, Soumilas, Chapman regarding Norm Reeves subpoena;	0.1	850	\$85.00
Caddell, Michael	10/18/22	Written Discovery	Review Order Granting Application for Pro Hac Vice to add Attorney Drew Newman; review Rodman correspondence to Newman, Francis, Sartell, Caddell, Chapman, Soumilas, Shriver, Faucette forwarding draft joint statement regarding discovery disagreement;	0.3	1075	\$322.50
Chapman, Cynthia	10/18/22	Written Discovery	Review Order Granting Application for Pro Hac Vice to add Attorney Drew Newman; review Rodman correspondence to Newman, Francis, Sartell, Caddell, Chapman, Soumilas, Shriver, Faucette forwarding draft joint statement regarding discovery disagreement;	0.1	850	\$85.00
Tabor, Amy	10/19/22	Motion Practice	Review draft joint statement.	0.5	750	\$375.00
Caddell, Michael	10/20/22	Pleadings and Service	Review Notice of Appearance by Drew Patrick Newman; review Rodman correspondence to Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver, Newman regarding update on the status of the class notice and sending a copy of same;	0.3	1075	\$322.50
Chapman, Cynthia	10/20/22	Pleadings and Service	Review Notice of Appearance by Drew Patrick Newman; review Rodman correspondence to Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver, Newman regarding update on the status of the class notice and sending a copy of same;	0.2	850	\$170.00
Kersh, Kathy	10/20/22	Pleadings and Service	Review and download new filings	0.1	325	\$32.50
Caddell, Michael	10/21/22	Pleadings and Service	Review Sartell correspondence to and from Rodman, Francis, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver, Newman forwarding Notice and link to Notice;	0.2	1075	\$215.00
Chapman, Cynthia	10/21/22	Pleadings and Service	Review Sartell correspondence to and from Rodman, Francis, Caddell, Tabor, Chapman, Soumilas, Faucette, Shriver, Newman forwarding Notice and link to Notice;	0.2	850	\$170.00
Caddell, Michael	10/25/22	Depositions	Review Shriver correspondence to Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette regarding subpoenas are in place of the Crowley Car Company subpoena noticed previously and forwarding same;	0.2	1075	\$215.00
Chapman, Cynthia	10/25/22	Pleadings and Service	Review Shriver correspondence to Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette regarding subpoenas of the Crowley Car Company subpoena noticed previously and forwarding same;	0.2	850	\$170.00
Tabor, Amy	10/25/22	Motion Practice	Revise draft position statement on discovery dispute.	5.0	750	\$3,750.00
Caddell, Michael	10/26/22	Written Discovery	Review Newman correspondence to and from Rodman, Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Shriver, Faucette regarding the Joint Statement regarding Discovery Disagreement;	0.4	1075	\$430.00
Chapman, Cynthia	10/26/22	Written Discovery	Review Newman correspondence to and from Rodman, Francis, Sartell, Caddell, Tabor, Chapman, Soumilas, Shriver, Faucette regarding the Joint Statement regarding Discovery Disagreement;	0.2	850	\$170.00
Kersh, Kathy	10/26/22	Pleadings and Service	Review and download new filing to network; review subpoenas from Tabor	0.1	325	\$32.50
Caddell, Michael	10/28/22	Settlement Talks and Conferences	Review multiple Tabor correspondence to and from Sartell, Caddell, Chapman regarding deadline to propose dates for settlement conference;	0.3	1075	\$322.50
Chapman, Cynthia	10/28/22	Settlement Talks and Conferences	Review multiple Tabor correspondence to and from Sartell, Caddell, Chapman regarding deadline to propose dates for settlement conference;	0.2	850	\$170.00
Caddell, Michael	10/31/22	Settlement Talks and Conferences	Review Tabor correspondence to and from Sartell, Caddell, Chapman regarding deadline to propose dates for settlement conference is tomorrow;	0.3	1075	\$322.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	10/31/22	Settlement Talks and Conferences	Review Tabor correspondence to and from Sartell, Caddell, Chapman regarding deadline to propose dates for settlement conference is tomorrow;	0.1	850	\$85.00
Caddell, Michael	11/01/22	Depositions	Review multiple Sartell correspondence to and from Tabor, Caddell, Chapman regarding scheduling telephone conference with Francis this morning regarding deadline to propose dates for settlement conference; review Sartell correspondence to and from Francis, Tabor, Chapman, Caddell forwarding Teams Meeting information; review Shriver correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette regarding documents from Von Housen and forwarding amended deposition notice; review Mantzopoulos correspondence to Sartell, Tabor, Caddell, Soumilas, Chapman, Francis, Rodman, Faucette forwarding link to Von Housen production; review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman forwarding draft joint status report; review multiple Sartell correspondence to and from Shriver, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette forwarding draft joint statement regarding settlement, scheduling settlement conference; review Joint Status Report;	1.2	1075	\$1,290.00
Chapman, Cynthia	11/01/22	Depositions	Review multiple Sartell correspondence to and from Tabor, Caddell, Chapman regarding scheduling telephone conference with Francis this morning regarding deadline to propose dates for settlement conference; review Sartell correspondence to and from Francis, Tabor, Chapman, Caddell forwarding Teams Meeting information; review Shriver correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette regarding documents from Von Housen and forwarding amended deposition notice; review Mantzopoulos correspondence to Sartell, Tabor, Caddell, Soumilas, Chapman, Francis, Rodman, Faucette forwarding link to Von Housen production; review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman forwarding draft joint status report; review multiple Sartell correspondence to and from Shriver, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette forwarding draft joint statement regarding settlement, scheduling settlement conference; review Joint Status Report;	1.0	850	\$850.00
Tabor, Amy	11/01/22	Settlement Talks and Conferences	Teleconference with Jim Francis and Jordan Sartell regarding settlement conference; teleconference with Jim Francis, Jordan Sartell, and opposing counsel regarding settlement conference; review and comment on draft status report.	1.5	750	\$1,125.00
Kersh, Kathy	11/01/22	Pleadings and Service	Download new filing to network	0.1	325	\$32.50
Kersh, Kathy	11/01/22	Pleadings and Service	Create custodian and upload documents from Von Housen motors to Lexbe; download documents to network from email	0.2	325	\$65.00
Caddell, Michael	11/06/22	Written Discovery	Review Order Vacating Hearing and Denying Defendant's Motion for Limited Discovery Absent Class Members; prepare correspondence to and from Sartell, Tabor, Francis, Soumilas, Chapman regarding good job on order; conf w/ Chapman;	0.6	1075	\$645.00
Chapman, Cynthia	11/06/22	Written Discovery	Review Order Vacating Hearing and Denying Defendant's Motion for Limited Discovery Absent Class Members; review Caddell correspondence to and from Sartell, Tabor, Francis, Soumilas, Chapman regarding order; conf w/ Caddell;	0.4	850	\$340.00
Caddell, Michael	11/07/22	Written Discovery	Review Sartell correspondence to and from Caddell, Tabor, Francis, Soumilas, Chapman regarding Order Vacating Hearing on Denying Defendants' Motion for Limited Discovery Absent from Class Members; review Sartell correspondence to and from Francis, Caddell, Tabor, Soumilas, Chapman regarding Magistrate Judge;	0.4	1075	\$430.00
Chapman, Cynthia	11/07/22	Written Discovery	Review Sartell correspondence to and from Caddell, Tabor, Francis, Soumilas, Chapman regarding Order Vacating Hearing on Denying Defendants' Motion for Limited Discovery Absent from Class Members; review Sartell correspondence to and from Francis, Caddell, Tabor, Soumilas, Chapman regarding Magistrate Judge Oberto;	0.2	850	\$170.00
Caddell, Michael	11/16/22	Depositions	Review Sartell correspondence to and from Rodman, Francis, Tabor, Caddell, Chapman regarding today's deposition; review Francis correspondence to and from Tabor, Sartell, Soumilas, Caddell, Chapman regarding call with Rodman requesting scheduling settlement conference; review Sartell correspondence to and from Caddell, Francis, Tabor, Soumilas, Chapman regarding OFAC settlement conference; review Rodman correspondence to Tabor, Chapman, Francis, Sartell, Kersh, Caddell regarding we are still not up and running and so must cancel tomorrow's deposition. We'll be in touch with a new date; conf w/ Chapman;	0.8	1075	\$860.00
Chapman, Cynthia	11/16/22	Depositions	Review Sartell correspondence to and from Rodman, Francis, Tabor, Caddell, Chapman regarding today's deposition; review Francis correspondence to and from Tabor, Sartell, Soumilas, Caddell, Chapman regarding call with Rodman requesting scheduling settlement conference; review Sartell correspondence to and from Caddell, Francis, Tabor, Soumilas, Chapman regarding OFAC settlement conference; review Rodman correspondence to Tabor, Chapman, Francis, Sartell, Kersh, Caddell regarding cancelling tomorrow's deposition; conf w/ Caddell;	0.8	850	\$680.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Tabor, Amy	11/16/22	Depositions	Prepare email to Rachel Rodman regarding noticing of depositions and calendaring issues; correspond via email with Jordan Sartell regarding third-party depositions.	0.1	750	\$75.00
Caddell, Michael	11/17/22	Settlement Talks and Conferences	Review Sartell correspondence to and from Tabor, Francis, Caddell, Chapman, Soumilas regarding Rodman email regarding cancelling deposition; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman regarding mediation calendar invite; t/conf Team; review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas regarding following up on our conversation this afternoon, and forwarding decisions from Judge Ishii and Magistrate Oberto on clear sailing agreements;	1.1	1075	\$1,182.50
Chapman, Cynthia	11/17/22	Settlement Talks and Conferences	Review Sartell correspondence to and from Tabor, Francis, Caddell, Chapman, Soumilas regarding Rodman cancelling deposition; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman regarding mediation calendar invite; t/conf Team; review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas regarding following up on our conversation this afternoon, and forwarding decisions from Judge Ishii and Magistrate Oberto on clear sailing agreements;	1.2	850	\$1,020.00
Tabor, Amy	11/17/22	Settlement Talks and Conferences	Teleconference with Jordan Sartell, Jim Francis, Michael Caddell, and Cynthia Chapman regarding potential mediation; research settlement approval standards in Eastern District of California.	1.5	750	\$1,125.00
Caddell, Michael	11/18/22	Depositions	Review Rodman correspondence to and from Tabor, Sartell, Kersh, Francis, Caddell, Chapman regarding still unable to access internal systems and need to reschedule Monday's deposition;	0.2	1075	\$215.00
Chapman, Cynthia	11/18/22	Depositions	Review Rodman correspondence to and from Tabor, Sartell, Kersh, Francis, Caddell, Chapman regarding need to reschedule Monday's deposition;	0.1	850	\$85.00
Tabor, Amy	11/23/22	Written Discovery	Review objection to third-party subpoenas.	0.1	750	\$75.00
Caddell, Michael	11/28/22	Depositions	Review multiple Sartell correspondence to and from Tabor, Francis, Caddell, Chapman, Sartell, Rodman, Stearns regarding calendar invite to VHN deposition;	0.2	1075	\$215.00
Chapman, Cynthia	11/28/22	Depositions	Review multiple Sartell correspondence to and from Tabor, Francis, Caddell, Chapman, Sartell, Rodman, Stearns regarding calendar invite to VHN deposition;	0.1	850	\$85.00
Caddell, Michael	12/01/22	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding mediation cancelled;	0.2	1075	\$215.00
Chapman, Cynthia	12/01/22	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding mediation cancelled;	0.1	850	\$85.00
Caddell, Michael	12/14/22	Settlement Talks and Conferences	Review Tabor correspondence to Sartell, Francis, Caddell, Chapman, Soumilas regarding any update from Rodman regarding settlement and regarding third party depositions;	0.1	1075	\$107.50
Chapman, Cynthia	12/14/22	Settlement Talks and Conferences	Review Tabor correspondence to Sartell, Francis, Caddell, Chapman, Soumilas regarding any update from Rodman regarding settlement and regarding third party depositions;	0.2	850	\$170.00
Caddell, Michael	12/15/22	Depositions	Review Sartell correspondence to and from Tabor, Francis, Caddell, Chapman, Soumilas regarding 3rd party depositions;	0.3	1075	\$322.50
Chapman, Cynthia	12/15/22	Depositions	Review Sartell correspondence to and from Tabor, Francis, Caddell, Chapman, Soumilas regarding 3rd party depositions;	0.1	850	\$85.00
Caddell, Michael	12/19/22	Settlement Talks and Conferences	Review Minute Order - In view of the parties' joint statement regarding proposed dates for settlement conference filed on November 1, 2022, the Court hereby SETS a Settlement Conference set for 3/9/2023 at 10:30 AM in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	12/19/22	Settlement Talks and Conferences	Review Minute Order regarding Settlement Conference set for 3/9/2023 at 10:30 AM before Magistrate Judge Sheila K. Oberto; conf w/ Caddell;	0.2	850	\$170.00
Caddell, Michael	12/20/22	Settlement Talks and Conferences	Review Order regarding Settlement Conference, the telephonic pre-settlement conference is set for 03/02/23 at 4pm; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	12/20/22	Settlement Talks and Conferences	Review Order regarding Settlement Conference, the telephonic pre-settlement conference is set for 03/02/23 at 4pm; conf w/ Caddell;	0.2	850	\$170.00
Kersh, Kathy	12/20/22	Pleadings and Service	Review new filings and download same to network; update calendar entries	0.3	325	\$97.50
Caddell, Michael	12/29/22	Written Discovery	Review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas regarding discovery and regarding experts and regarding scheduling telephone conference next week to further discuss;	0.3	1075	\$322.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	12/29/22	Written Discovery	Review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas regarding discovery and regarding experts and regarding scheduling telephone conference next week to further discuss;	0.2	850	\$170.00
Tabor, Amy	12/29/22	Motion Practice	Prepare email to counsel team regarding status of discovery.	0.1	750	\$75.00
Caddell, Michael	01/03/23	Settlement Talks and Conferences	Review Francis correspondence to and from Tabor, Sartell, Caddell, Chapman, Soumilas regarding discovery and regarding experts; review Francis correspondence to and from Caddell, Chapman, Sartell, Tabor forwarding Rodman email regarding Rule 408 Communication; review Shriver correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette forwarding documents produced by Lithia Motors, Inc. and Ed Martin Automotive Group. Both productions are in response to subpoenas served by CBC in October 2021;	0.5	1075	\$537.50
Chapman, Cynthia	01/03/23	Settlement Talks and Conferences	Review Francis correspondence to and from Tabor, Sartell, Caddell, Chapman, Soumilas regarding discovery and regarding experts; review Francis correspondence to and from Caddell, Chapman, Sartell, Tabor forwarding Rodman email regarding Rule 408 Communication; review Shriver correspondence to and from Sartell, Caddell, Tabor, Chapman, Soumilas, Francis, Rodman, Newman, Faucette forwarding documents produced by Lithia Motors, Inc. and Ed Martin Automotive Group;	0.3	850	\$255.00
Kersh, Kathy	01/04/23	Written Discovery	Review new documents from third party; split Lithia Motors documents and load into Lexbe; code dates and Confidential status; email to Tabor regarding documents; review response	1.0	325	\$325.00
Caddell, Michael	01/09/23	Settlement Talks and Conferences	Review Tabor correspondence to and from Caddell, Chapman regarding fact discovery; review Chapman response; respond; prepare correspondence to Tabor, Francis, Sartell, Chapman, Soumilas regarding scheduling telephone conference to discuss fact discovery due on February 3;	0.4	1075	\$430.00
Chapman, Cynthia	01/09/23	Settlement Talks and Conferences	Review Tabor correspondence to and from Caddell, Chapman regarding fact discovery; prepare response; review Caddell response; review Caddell correspondence to Tabor, Francis, Sartell, Chapman, Soumilas regarding scheduling telephone conference to discuss fact discovery due on February 3;	0.4	850	\$340.00
Caddell, Michael	01/10/23	Settlement Talks and Conferences	Review multiple Francis correspondence to and from Caddell, Tabor, Sartell, Chapman, Soumilas regarding scheduling telephone conference; respond;	0.3	1075	\$322.50
Chapman, Cynthia	01/10/23	Settlement Talks and Conferences	Review multiple Francis correspondence to and from Caddell, Tabor, Sartell, Chapman, Soumilas regarding scheduling telephone conference; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	01/11/23	Settlement Talks and Conferences	T/Conf Team; conf w/ Chapman;	1.1	1075	\$1,182.50
Chapman, Cynthia	01/11/23	Settlement Talks and Conferences	T/Conf w/ Team; conf w/ Caddell;	1.1	850	\$935.00
Caddell, Michael	01/14/23	Settlement Talks and Conferences	Review Francis correspondence to and from Caddell, Chapman, Sartell, Soumilas regarding Rule 408 communication and regarding scheduling telephone conference to further discuss; review Chapman response; respond; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	01/14/23	Settlement Talks and Conferences	Review Francis correspondence to and from Caddell, Chapman, Sartell, Soumilas regarding Rule 408 communication and regarding scheduling telephone conference to further discuss; prepare response; review Caddell response; conf w/ Caddell;	0.4	850	\$340.00
Caddell, Michael	01/17/23	Pleadings and Service	Review Motion to Stay, Motion Hearing set for February 8, 2023 at 9:30am; review Sartell correspondence to and from Kusamura, Francis, Caddell, Chapman, Tabor, Newman, Rodman, Shriver, Faucette regarding Joint Motion to Stay;	0.4	1075	\$430.00
Chapman, Cynthia	01/17/23	Pleadings and Service	Review Motion to Stay, Motion Hearing set for February 8, 2023 at 9:30am; review Sartell correspondence to and from Kusamura, Francis, Caddell, Chapman, Tabor, Newman, Rodman, Shriver, Faucette regarding Joint Motion to Stay;	0.2	850	\$170.00
Caddell, Michael	01/18/23	Written Discovery	Review Stipulation and Proposed Order for Stay of Fact and Expert Discovery deadlines; review Sartell correspondence to and from Kusamura, Francis, Caddell, Chapman, Tabor, Newman, Rodman, Shriver, Faucette regarding same; review Sartell correspondence to and from Kusamura, Francis, Caddell, Chapman, Tabor, Newman, Rodman, Shriver, Faucette regarding Proposed Order forwarding the parties' stipulation to stay fact and expert discovery deadlines in Word format; review Tabor correspondence to and from Francis, Caddell, Sartell, Chapman, Soumilas regarding Judge Ishii;	0.5	1075	\$537.50
Chapman, Cynthia	01/18/23	Written Discovery	Review Stipulation and Proposed Order for Stay of Fact and Expert Discovery deadlines; review Sartell correspondence to and from Kusamura, Francis, Caddell, Chapman, Tabor, Newman, Rodman, Shriver, Faucette regarding same; review Sartell correspondence to and from Kusamura, Francis, Caddell, Chapman, Tabor, Newman, Rodman, Shriver, Faucette regarding Proposed Order forwarding the parties' stipulation to stay fact and expert discovery deadlines in Word format; review Tabor correspondence to and from Francis, Caddell, Sartell, Chapman, Soumilas regarding Judge Ishii;	0.5	850	\$425.00
Tabor, Amy	01/18/23	Motion Practice	Review stipulation staying discovery deadlines; prepare email to co-counsel regarding Judge Ishii's retirement.	0.2	750	\$150.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	01/19/23	Written Discovery	Review Order Staying Discovery Deadlines and Denying as Moot Joint Motion to Stay;	0.2	1075	\$215.00
Chapman, Cynthia	01/19/23	Written Discovery	Review Order Staying Discovery Deadlines and Denying as Moot Joint Motion to Stay;	0.1	850	\$85.00
Caddell, Michael	01/20/23	Settlement Talks and Conferences	Review Francis correspondence to and from Caddell, Chapman, Tabor, Sartell regarding telephone conference with Rodman regarding in person mediation before March 9; review Chapman response; review Francis correspondence to Tabor, Caddell, Sartell, Soumilas, Chapman regarding Mediation February 9, 2023; conf w/ Chapman;	0.5	1075	\$537.50
Chapman, Cynthia	01/20/23	Settlement Talks and Conferences	Review Francis correspondence to and from Caddell, Chapman, Tabor, Sartell regarding telephone conference with Rodman regarding in person mediation before March 9; prepare response; review Francis correspondence to Tabor, Caddell, Sartell, Soumilas, Chapman regarding Mediation February 9, 2023; conf w/ Caddell;	0.5	850	\$425.00
Kersh, Kathy	01/20/23	Pleadings and Service	Review and download new documents to network; update calendar	0.2	325	\$65.00
Caddell, Michael	01/23/23	Settlement Talks and Conferences	Review Francis correspondence to and from Cohen, Rodman, Caddell, Chapman, Tabor, Sartell, Soumilas, Kabacinski, Rosado regarding mediation confirmation details; respond; review Cohen correspondence to and from Francis, Rodman, Caddell, Chapman, Tabor, Sartell, Soumilas, Kabacinski, Rosado forwarding confirmation letter for February 9 mediation with Rodney Max; review Kabacinski correspondence to and from Cohen, Francis, Caddell, Chapman, Tabor, Sartell, Soumilas, Rosado forwarding key documents including complaint, answer and orders; review Cohen correspondence to all counsel regarding confirming receipt of the pleadings; review Max correspondence to co-counsel regarding mediation;	2.3	1075	\$2,472.50
Chapman, Cynthia	01/23/23	Settlement Talks and Conferences	Review Francis correspondence to and from Cohen, Rodman, Caddell, Chapman, Tabor, Sartell, Soumilas, Kabacinski, Rosado regarding mediation confirmation details; review Caddell response; review Cohen correspondence to and from Francis, Rodman, Caddell, Chapman, Tabor, Sartell, Soumilas, Kabacinski, Rosado forwarding confirmation letter for February 9 mediation with Rodney Max; review Kabacinski correspondence to and from Cohen, Francis, Caddell, Chapman, Tabor, Sartell, Soumilas, Rosado forwarding key documents including complaint, answer and orders; review Cohen correspondence to all counsel regarding confirming receipt of the pleadings; review Max correspondence to co-counsel regarding mediation;	0.5	850	\$425.00
Tabor, Amy	01/23/23	Settlement Talks and Conferences	Review correspondence from mediator; execute and send confidentiality agreement to mediator.	0.2	750	\$150.00
Caddell, Michael	01/27/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Cohen, Francis, co-counsel forwarding executed Confidential Mediation Agreement; review Rodman correspondence to and from Francis regarding mediation logistics; respond;	0.4	1075	\$430.00
Chapman, Cynthia	01/27/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Cohen, Francis, co-counsel forwarding executed Confidential Mediation Agreement; review Rodman correspondence to and from Francis regarding mediation logistics; review Caddell response;	0.3	850	\$255.00
Tabor, Amy	01/27/23	Settlement Talks and Conferences	Correspond via email with co-counsel regarding preparation for mediation.	0.1	750	\$75.00
Caddell, Michael	01/30/23	Settlement Talks and Conferences	Prepare correspondence to and from Labbe, Chapman, Tabor regarding lodestar;	0.2	1075	\$215.00
Chapman, Cynthia	01/30/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Labbe, Chapman, Tabor regarding lodestar;	0.1	850	\$85.00
Caddell, Michael	02/01/23	Settlement Talks and Conferences	Review Cohen correspondence to and from Francis, Sartell, Soumilas, Kabacinski, Rosado, Caddell, Chapman, Tabor, Max regarding Max would like to have a brief pre mediation call on Friday, February 9 and forwarding confirmation letter; review Newman correspondence to and from defense counsel, co-counsel forwarding a draft joint case summary to send to Max in advance of the February 9 mediation; review multiple Francis correspondence to and from Caddell, Tabor, Chapman, Sartell regarding scheduling telephone conference at 12pm tomorrow; respond; review Labbe correspondence forwarding lodestar; prepare correspondence to Cohen, Francis, Rodman, Chapman, Tabor, Sartell, Soumilas, Kabacinski, Rosado forwarding signed confidentiality agreement;	1.1	1075	\$1,182.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	02/01/23	Settlement Talks and Conferences	Review Cohen correspondence to and from Francis, Sartell, Soumilas, Kabacinski, Rosado, Caddell, Chapman, Tabor, Max regarding pre mediation call on Friday, February 9 and forwarding confirmation letter; review Newman correspondence to and from defense counsel, co-counsel forwarding a draft joint case summary to send to Max in advance of the February 9 mediation; review multiple Francis correspondence to and from Caddell, Tabor, Chapman, Sartell regarding scheduling telephone conference at 12pm tomorrow; review Caddell response; review Labbe correspondence forwarding lodestar; review Caddell correspondence to Cohen, Francis, Rodman, Chapman, Tabor, Sartell, Soumilas, Kabacinski, Rosado forwarding signed confidentiality agreement;	0.6	850	\$510.00
Caddell, Michael	02/02/23	Settlement Talks and Conferences	Prepare correspondence to and from Cohen, Francis, et al. regarding mediation preparation; review Cohen correspondence to and from Caddell, defense counsel, co-counsel confirming receipt of duly executed Confidential Mediation Agreement; review Kabacinski correspondence to and from Cohen, co-counsel, defense counsel forwarding signed agreement for FMS attorneys; review Rodman correspondence to and from co-counsel, defense counsel regarding draft joint case summary; review Cohen correspondence to and from defense counsel, co-counsel regarding providing names of the people participating at the mediation; review Newman correspondence to and from Cohen, defense counsel, co-counsel forwarding Parties' Joint Case Summary and relevant filings;	1.0	1075	\$1,075.00
Chapman, Cynthia	02/02/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Cohen, Francis, et al. regarding mediation preparation; review Cohen correspondence to and from Caddell, defense counsel, co-counsel confirming receipt of duly executed Confidential Mediation Agreement; review Kabacinski correspondence to and from Cohen, co-counsel, defense counsel forwarding signed agreement for FMS attorneys; review Rodman correspondence to and from co-counsel, defense counsel regarding draft joint case summary; review Cohen correspondence to and from defense counsel, co-counsel regarding providing names of the people participating at the mediation; review Newman correspondence to and from Cohen, defense counsel, co-counsel forwarding Parties' Joint Case Summary and relevant filings;	0.8	850	\$680.00
Caddell, Michael	02/03/23	Settlement Talks and Conferences	Prepare correspondence regarding mediation preparation; T/Conf Team and Max; conf w/ Chapman; review multiple Sartell correspondence to and from Francis, Tabor, Caddell, Chapman, Soumilas regarding revised version of the mediation memorandum and forwarding same; review Newman correspondence to and from Cohen, defense counsel, co-counsel forwarding exhibits filed in connection with the Parties' Class Certification briefing; review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas forwarding suggested changes in redline to the mediation statement; respond; review Tabor correspondence to Cohen, Caddell, Chapman, Francis forwarding Plaintiff's Confidential Mediation Statement;	1.2	1075	\$1,290.00
Chapman, Cynthia	02/03/23	Settlement Talks and Conferences	Review Caddell correspondence regarding mediation preparation; conf w/ Caddell; review multiple Sartell correspondence to and from Francis, Tabor, Caddell, Chapman, Soumilas regarding revised version of the mediation memorandum and forwarding same; review Newman correspondence to and from Cohen, defense counsel, co-counsel forwarding exhibits filed in connection with the Parties' Class Certification briefing; review Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas forwarding suggested changes in redline to the mediation statement; review Caddell response; review Tabor correspondence to Cohen, Caddell, Chapman, Francis forwarding Plaintiff's Confidential Mediation Statement; conf with Caddell;	1.0	850	\$850.00
Tabor, Amy	02/03/23	Settlement Talks and Conferences	Revise draft mediation statement.	2.5	750	\$1,875.00
Caddell, Michael	02/04/23	Settlement Talks and Conferences	Prepare for mediation; prepare correspondence to Team;	1.0	1075	\$1,075.00
Chapman, Cynthia	02/04/23	Settlement Talks and Conferences	Review Caddell correspondence to Team;	0.2	850	\$170.00
Caddell, Michael	02/05/23	Settlement Talks and Conferences	Prepare correspondence to and from Tabor, Francis, Sartell, Chapman, Soumilas regarding CBC mediation statement;	0.4	1075	\$430.00
Chapman, Cynthia	02/05/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Tabor, Francis, Sartell, Chapman, Soumilas regarding CBC filed a mediation;	0.2	850	\$170.00
Caddell, Michael	02/06/23	Settlement Talks and Conferences	Prepare for mediation; prepare correspondence to Team; confs w/ Chapman; review Cohen correspondence to and from Tabor, Caddell, Chapman, Francis regarding confirming receipt of Plaintiff's confidential mediation statement;	1.6	1075	\$1,720.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	02/06/23	Settlement Talks and Conferences	Review Caddell correspondence to Team; confs w/ Caddell; review Cohen correspondence to and from Tabor, Caddell, Chapman, Francis regarding confirming receipt of Plaintiff's confidential mediation statement;	0.5	850	\$425.00
Caddell, Michael	02/07/23	Settlement Talks and Conferences	Review Francis correspondence to and from Caddell, Tabor, Chapman, Soumilas, Sartell regarding telephone conference with Max; prepare multiple responses; review multiple Francis correspondence regarding time of flight; prepare multiple responses; prepare for mediation;	1.5	1075	\$1,612.50
Chapman, Cynthia	02/07/23	Settlement Talks and Conferences	Review Francis correspondence to and from Caddell, Tabor, Chapman, Soumilas, Sartell regarding telephone conference with Max; review multiple Caddell responses; review multiple Francis correspondence regarding time of flight; review multiple Caddell responses; confs with Caddell regarding mediation preparation;	1.0	850	\$850.00
Caddell, Michael	02/08/23	Settlement Talks and Conferences	Travel to D.C. for mediation; review Rodman correspondence to and from Cohen, Francis, Caddell, Chapman, Tabor, Sartell, Kabacinski, Rosado, Max regarding address for mediation; review Cohen correspondence to and from defense counsel, co-counsel regarding reminder for an in-person mediation with Rod for Thursday, February 9th at 9am ET;	10.5	1075	\$11,287.50
Chapman, Cynthia	02/08/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Cohen, Francis, Caddell, Chapman, Tabor, Sartell, Kabacinski, Rosado, Max regarding address for mediation; review Cohen correspondence to and from defense counsel, co-counsel regarding reminder for an in-person mediation with Rod for Thursday, February 9th at 9am ET; confs with Caddell;	0.4	850	\$340.00
Caddell, Michael	02/09/23	Settlement Talks and Conferences	Attend mediation; prepare multiple correspondence to and from Francis regarding mediation; review Max correspondence to and from Francis, Caddell, Rodman regarding mediation; review Tabor correspondence to and from Caddell, Chapman regarding status of mediation; respond; T/C's w/ Chapman;	9.8	1075	\$10,535.00
Chapman, Cynthia	02/09/23	Settlement Talks and Conferences	Review multiple Caddell correspondence to and from Francis regarding mediation; review Max correspondence to and from Francis, Caddell, Rodman regarding mediation; review Tabor correspondence to and from Caddell, Chapman regarding status of mediation; review Caddell response; T/C's with Caddell; T/C with Tabor;	1.2	850	\$1,020.00
Caddell, Michael	02/10/23	Settlement Talks and Conferences	Prepare correspondence to and from Francis regarding CBC settlement; review Cohen correspondence to and from Francis, Caddell, Rodman, Max regarding Zoom meeting invitation for Monday, February 13 at 10am (ET); return to California; conf w/ Chapman;	10.0	1075	\$10,750.00
Chapman, Cynthia	02/10/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Francis regarding CBC settlement; review Cohen correspondence to and from Francis, Caddell, Rodman, Max regarding Zoom meeting invitation for Monday, February 13 at 10am (ET); conf with Caddell;	0.4	850	\$340.00
Caddell, Michael	02/11/23	Settlement Talks and Conferences	Review multiple Max correspondence to and from Francis, Caddell, Rodman, Cohen; confs w/ Chapman;	0.8	1075	\$860.00
Chapman, Cynthia	02/11/23	Settlement Talks and Conferences	Confs w/ Caddell re mediation;	1.0	850	\$850.00
Caddell, Michael	02/13/23	Settlement Talks and Conferences	Continue mediation via Zoom; confs w/ Chapman, Francis;	3.8	1075	\$4,085.00
Chapman, Cynthia	02/13/23	Settlement Talks and Conferences	Confs w/ Caddell re mediation;	0.8	850	\$680.00
Caddell, Michael	02/14/23	Settlement Talks and Conferences	Review multiple Francis correspondence to and from Max, Caddell regarding Plaintiff and Class accepts settlement recommendation; review multiple Max correspondence to and from Rodman, Francis, Caddell, Cohen regarding resolution; respond; review Rodman correspondence to and from Francis, Caddell regarding providing times on Wednesday and Thursday for to discuss next steps; respond; prepare correspondence to and from Tabor, Chapman regarding case settled; conf w/ Chapman;	1.0	1075	\$1,075.00
Chapman, Cynthia	02/14/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Tabor, Chapman regarding case settled; conf with Caddell;	0.3	850	\$255.00
Tabor, Amy	02/14/23	Settlement Talks and Conferences	Review email correspondence regarding settlement; teleconference with Cynthia Chapman regarding settlement.	0.1	750	\$75.00
Caddell, Michael	02/16/23	Settlement Talks and Conferences	T/conf Francis, Rodman regarding next steps; t/c Tabor; review Tabor correspondence to and from Caddell, Chapman regarding telephone conference with Kusamura regarding Magistrate Judge Oberto regarding we should file a Notice of Settlement and include in the Notice a request for a scheduling order to brief preliminary approval and set a preliminary approval hearing; respond; prepare multiple correspondence to and from Rodman, Francis, Tabor, Chapman regarding same;	1.3	1075	\$1,397.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	02/16/23	Settlement Talks and Conferences	Review Tabor correspondence to and from Caddell, Chapman regarding telephone conference with Kusamura regarding Magistrate Judge Oberto regarding filing a Notice of Settlement; review Caddell response; review multiple Caddell correspondence to and from Rodman, Francis, Tabor, Chapman regarding same;	0.5	850	\$425.00
Tabor, Amy	02/16/23	Settlement Talks and Conferences	Teleconference with courtroom deputy regarding settlement; correspond via email with co-counsel and opposing counsel regarding notice of settlement. T/C Caddell;	0.1	750	\$75.00
Caddell, Michael	02/21/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Francis, Caddell, Newman, Shriver forwarding draft joint notice of settlement; review and respond; conf w/ Chapman;	0.4	1075	\$430.00
Chapman, Cynthia	02/21/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Francis, Caddell, Newman, Shriver forwarding draft joint notice of settlement; conf w/ Caddell;	0.4	850	\$340.00
Caddell, Michael	02/22/23	Settlement Talks and Conferences	Review Tabor correspondence to and from Sartell, Caddell, Chapman regarding magistrate proposal regarding settlement conference statements; respond; prepare multiple correspondence to and from Tabor, Sartell, Francis, Chapman forwarding joint notice of statement; review Rodman correspondence to and from Francis, Caddell, Newman, Shriver regarding draft joint notice of settlement statement; respond;	0.6	1075	\$645.00
Chapman, Cynthia	02/22/23	Settlement Talks and Conferences	Review Tabor correspondence to and from Sartell, Caddell, Chapman regarding magistrate proposal regarding settlement conference statements; review Caddell response; review multiple Caddell correspondence to and from Tabor, Sartell, Francis, Chapman forwarding joint notice of statement; review Rodman correspondence to and from Francis, Caddell, Newman, Shriver regarding draft joint notice of settlement statement; review Caddell response;	0.5	850	\$425.00
Tabor, Amy	02/22/23	Settlement Talks and Conferences	Prepare correspondence to and from Sartell, Caddell, Chapman regarding magistrate proposal regarding settlement conference statements; review multiple Caddell correspondence to and from Tabor, Sartell, Francis, Chapman forwarding joint notice of statement;	0.6	750	\$450.00
Caddell, Michael	02/23/23	Settlement Talks and Conferences	Review Notice Joint Notice of Class Action Settlement and Request to Vacate Current Deadlines and for Scheduling Order on Preliminary Approval of Settlement;	0.2	1075	\$215.00
Chapman, Cynthia	02/23/23	Settlement Talks and Conferences	Review Notice Joint Notice of Class Action Settlement and Request to Vacate Current Deadlines and for Scheduling Order on Preliminary Approval of Settlement;	0.1	850	\$85.00
Caddell, Michael	02/24/23	Settlement Talks and Conferences	Review Minute Order - on February 23, 2023, Plaintiff filed a Notice of Settlement, indicating that the parties have settled the matter on a class basis and requesting until April 10, 2023, to file the motion for preliminary approval, for good cause shown, pursuant to Local Rule 160(b), the Court Grants Plaintiff's request and ORDERS that, by no later than April 10, 2023, the parties shall file the motion for preliminary approval of class action settlement, all other deadlines and hearings are Vacated, failure to comply with this order may be grounds for the imposition of sanctions on any and all counsel as well as any party or parties who cause non-compliance with this order; conf w/ Chapman;	0.2	1075	\$215.00
Chapman, Cynthia	02/24/23	Settlement Talks and Conferences	Review Minute Order regarding Notice of Settlement, motion for preliminary approval deadline; conf w/ Caddell;	0.2	850	\$170.00
Caddell, Michael	02/27/23	Settlement Talks and Conferences	Review Minute Order - As part of the Notice of Class Action Settlement filed by the parties on February 23, 2023, the parties requested that the Court "refer adjudication of the proposed class action settlement, including but not limited to preliminary and final motions for approval and their accompanying hearings," to the undersigned, it is not clear to the Court whether the parties wished to request referral of the matter to the undersigned pursuant to Local Rule 302, or reassignment of the case to the undersigned pursuant to Local Rule 301, if the latter, the parties shall each file the consent form at Doc. [3]-1 as soon as is practicable; prepare correspondence to and from Rodman, Francis, Tabor, Sartell, Chapman regarding minute order; review multiple Tabor correspondence to and from Rodman, Caddell, Francis, Sartell, Chapman, Newman, Shriver regarding the magistrate's jurisdiction using the form at Dkt. 3-1 and forwarding Plaintiff's form;	0.5	1075	\$537.50
Chapman, Cynthia	02/27/23	Settlement Talks and Conferences	Review Minute Order regarding referring adjudication of the proposed class action settlement; review Caddell correspondence to and from Rodman, Francis, Tabor, Sartell, Chapman regarding minute order; review multiple Tabor correspondence to and from Rodman, Caddell, Francis, Sartell, Chapman, Newman, Shriver regarding the magistrate's jurisdiction using the form at Dkt. 3-1 and forwarding Plaintiff's form;	0.2	850	\$170.00
Tabor, Amy	02/27/23	Pleadings and Service	Review Caddell correspondence to and from Rodman, Francis, Tabor, Sartell, Chapman regarding minute order; prepare multiple Tabor correspondence to and from Rodman, Caddell, Francis, Sartell, Chapman, Newman, Shriver regarding we are fine with consenting to the magistrate's jurisdiction using the form at Dkt. 3-1 and forwarding Plaintiff's form;	0.2	750	\$150.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	02/28/23	Pleadings and Service	Review Newman correspondence to and from Rodman, Francis, Tabor, Caddell, Sartell, Chapman, Shriver regarding consenting to the magistrate's jurisdiction using the form; review Consent/Decline of U.S. Magistrate Judge Jurisdiction;	0.2	1075	\$215.00
Chapman, Cynthia	02/28/23	Pleadings and Service	Review Newman correspondence to and from Rodman, Francis, Tabor, Caddell, Sartell, Chapman, Shriver regarding consenting to the magistrate's jurisdiction using the form; review Consent/Decline of U.S. Magistrate Judge Jurisdiction;	0.1	850	\$85.00
Caddell, Michael	03/02/23	Pleadings and Service	Review Consent Order Reassigning Case for all purposes to Magistrate Oberto;	0.1	1075	\$107.50
Chapman, Cynthia	03/02/23	Pleadings and Service	Review Consent Order Reassigning Case for all purposes to Magistrate Oberto;	0.1	850	\$85.00
Caddell, Michael	03/06/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement and forwarding same;	0.6	1075	\$645.00
Chapman, Cynthia	03/06/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement and forwarding same;	0.2	850	\$170.00
Tabor, Amy	03/06/23	Settlement Talks and Conferences	Review and comment on draft settlement agreement.	0.5	750	\$375.00
Caddell, Michael	03/08/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft class action settlement agreement and forwarding same for review and consideration;	0.5	1075	\$537.50
Chapman, Cynthia	03/08/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft class action settlement agreement and forwarding same for review and consideration;	0.2	850	\$170.00
Caddell, Michael	03/22/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.4	1075	\$430.00
Chapman, Cynthia	03/22/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.2	850	\$170.00
Caddell, Michael	03/27/23	Settlement Talks and Conferences	Review Rodman correspondence to Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding update on settlement agreement;	0.2	1075	\$215.00
Chapman, Cynthia	03/27/23	Settlement Talks and Conferences	Review Rodman correspondence to Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding update on settlement agreement;	0.2	850	\$170.00
Caddell, Michael	03/30/23	Settlement Talks and Conferences	Review Rodman correspondence to Sartell, Francis, Soumilas, Caddell, Chapman, Tabor forwarding draft settlement agreement;	0.6	1075	\$645.00
Chapman, Cynthia	03/30/23	Settlement Talks and Conferences	Review Rodman correspondence to Sartell, Francis, Soumilas, Caddell, Chapman, Tabor forwarding draft settlement agreement;	0.2	850	\$170.00
Caddell, Michael	03/31/23	Settlement Talks and Conferences	Review Francis correspondence to and from Rodman, Sartell, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.3	1075	\$322.50
Chapman, Cynthia	03/31/23	Settlement Talks and Conferences	Review Francis correspondence to and from Rodman, Sartell, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.2	850	\$170.00
Caddell, Michael	04/04/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.4	1075	\$430.00
Chapman, Cynthia	04/04/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.2	850	\$170.00
Caddell, Michael	04/05/23	Settlement Talks and Conferences	Review Rodman correspondence to Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding requesting short extension to file settlement agreement deadline;	0.1	1075	\$107.50
Chapman, Cynthia	04/05/23	Settlement Talks and Conferences	Review Rodman correspondence to Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding requesting short extension to file settlement agreement deadline;	0.1	850	\$85.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Caddell, Michael	04/06/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding requesting 14-day extension to file settlement agreement; review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor forwarding draft stipulation and proposed order regarding 14-day extension to file MPA; review Stipulation and Proposed Order for Extension of Deadline to File Motion for Preliminary Approval of the Class Action Settlement regarding Minute order; review Kabacinski correspondence to Judge Oberto, Francis, Soumilas, Sartell, Tabor, Chapman, Caddell, Newman, Jeff, Rodman, Shriver forwarding Word version of the Stipulation and Proposed Order;	0.3	1075	\$322.50
Chapman, Cynthia	04/06/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding requesting 14-day extension to file settlement agreement; review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor forwarding draft stipulation and proposed order regarding 14-day extension to file MPA; review Stipulation and Proposed Order for Extension of Deadline to File Motion for Preliminary Approval of the Class Action Settlement regarding Minute order; review Kabacinski correspondence to Judge Oberto, Francis, Soumilas, Sartell, Tabor, Chapman, Caddell, Newman, Jeff, Rodman, Shriver forwarding Word version of the Stipulation and Proposed Order;	0.2	850	\$170.00
Caddell, Michael	04/07/23	Settlement Talks and Conferences	Review Stipulation and Order to Extend Deadline to File Motion for Preliminary Approval of the Class Action Settlement;	0.1	1075	\$107.50
Chapman, Cynthia	04/07/23	Settlement Talks and Conferences	Review Stipulation and Order to Extend Deadline to File Motion for Preliminary Approval of the Class Action Settlement;	0.1	850	\$85.00
Caddell, Michael	04/10/23	Settlement Talks and Conferences	Review Sartell correspondence to Francis, Caddell regarding latest settlement agreement and forwarding same;	0.5	1075	\$537.50
Chapman, Cynthia	04/10/23	Settlement Talks and Conferences	Review Sartell correspondence to Francis, Caddell regarding latest settlement agreement and forwarding same;	0.2	850	\$170.00
Tabor, Amy	04/10/23	Settlement Talks and Conferences	Teleconference with Jordan Sartel regarding comments on draft settlement agreement.	1.0	750	\$750.00
Kersh, Kathy	04/10/23	Settlement Talks and Conferences	Review new NEF; update calendar; download new filing to network and circulate same to attorneys	0.1	325	\$32.50
Caddell, Michael	04/12/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Caddell regarding revisions to draft settlement agreement and forwarding same; respond;	0.4	1075	\$430.00
Chapman, Cynthia	04/12/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Caddell regarding revisions to draft settlement agreement and forwarding same; review Caddell response;	0.2	850	\$170.00
Caddell, Michael	04/13/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.3	1075	\$322.50
Chapman, Cynthia	04/13/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding draft settlement agreement;	0.2	850	\$170.00
Caddell, Michael	04/17/23	Settlement Talks and Conferences	Review multiple Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding status of draft settlement agreement; review Francis correspondence to and from Caddell, Sartell regarding same;	0.5	1075	\$537.50
Chapman, Cynthia	04/17/23	Settlement Talks and Conferences	Review multiple Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding status of draft settlement agreement; review Francis correspondence to and from Caddell, Sartell regarding same;	0.3	850	\$255.00
Caddell, Michael	04/20/23	Settlement Talks and Conferences	Review multiple Francis correspondence to and from Rodman, Sartell, Soumilas, Caddell, Chapman, Tabor regarding edits to draft settlement agreement, and scheduling telephone conference to further discuss; review multiple Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor forwarding draft stipulation and proposed order regarding 7-day extension to file MPA; review Rodman correspondence to and from Francis, Sartell, Soumilas, Caddell, Chapman, Tabor forwarding Zoom meeting invite regarding settlement discussion; review Sartell correspondence to and from Soumilas, Caddell, Tabor regarding revised settlement agreement and forwarding same; review Stipulation regarding Minute Order - terminate deadlines and hearings for extension of deadline to file motion for preliminary approval of class action settlement; review Kabacinski correspondence to and from Judge Oberto, co-counsel, defense counsel forwarding Word version of the Stipulation and Proposed Order portion of the same;	1.0	1075	\$1,075.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	04/20/23	Settlement Talks and Conferences	Review Francis correspondence to and from Rodman, Sartell, Soumilas, Caddell, Chapman, Tabor regarding edits to draft settlement agreement, and scheduling telephone conference to further discuss; review multiple Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor forwarding draft stipulation and proposed order regarding 7-day extension to file MPA; review Rodman correspondence to and from Francis, Sartell, Soumilas, Caddell, Chapman, Tabor forwarding Zoom meeting invite regarding settlement discussion; review Sartell correspondence to and from Soumilas, Caddell, Tabor regarding revised settlement agreement and forwarding same; review Stipulation regarding Minute Order - terminate deadlines and hearings for extension of deadline to file motion for preliminary approval of class action settlement; review Kabacinski correspondence to and from Judge Oberto, co-counsel, defense counsel forwarding Word version of the Stipulation and Proposed Order portion of the same;	0.5	850	\$425.00
Tabor, Amy	04/20/23	Settlement Talks and Conferences	Review and comment on revised draft settlement agreement.	0.1	750	\$75.00
Caddell, Michael	04/21/23	Settlement Talks and Conferences	Review Francis correspondence to and from Rodman, Sartell, Soumilas, Caddell, Chapman, Tabor forwarding additional revisions to draft settlement agreement and regarding scheduling telephone conference to further discuss;	0.4	1075	\$430.00
Chapman, Cynthia	04/21/23	Settlement Talks and Conferences	Review Francis correspondence to and from Rodman, Sartell, Soumilas, Caddell, Chapman, Tabor forwarding additional revisions to draft settlement agreement and regarding scheduling telephone conference to further discuss;	0.2	850	\$170.00
Caddell, Michael	04/24/23	Settlement Talks and Conferences	Prepare multiple correspondence to and from Rodman, Francis, Sartell, Soumilas, Chapman, Tabor regarding joining in telephone conference regarding settlement; t/conf w/ counsel regarding settlement agreement, etc.; review Order on Stipulation for further 7-Day Extension of Deadline to File Motion for Preliminary Approval of the Class Action Settlement, Deadline to File Motion for Preliminary Approval of the Class Action Settlement and for good cause shown, it is hereby Ordered that the April 24, 2023, deadline set forth in the Court's April 7, 2023, order is further extended by 7 days and, by no later than May 1, 2023, the parties shall file the motion for preliminary approval of class action settlement;	1.5	1075	\$1,612.50
Chapman, Cynthia	04/24/23	Settlement Talks and Conferences	Review multiple Caddell correspondence to and from Rodman, Francis, Sartell, Soumilas, Chapman, Tabor regarding joining in telephone conference regarding settlement; t/conf w/ counsel to finalize settlement agreement, etc.; review Order on Stipulation for further 7-Day Extension of Deadline to File Motion for Preliminary Approval of the Class Action Settlement, Deadline to File Motion for Preliminary Approval of the Class Action Settlement and for good cause shown, it is hereby Ordered that the April 24, 2023, deadline set forth in the Court's April 7, 2023, order is further extended by 7 days and, by no later than May 1, 2023, the parties shall file the motion for preliminary approval of class action settlement;	0.8	850	\$680.00
Tabor, Amy	04/24/23	Settlement Talks and Conferences	Teleconference with co-counsel and opposing counsel regarding revisions to settlement agreement; research tax implications of qualified settlement fund; prepare email to Jordan Sartell regarding qualified settlement fund.	1.0	750	\$750.00
Caddell, Michael	04/25/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Francis, Sartell, Soumilas, Caddell, Chapman, Tabor regarding revised settlement agreement and forwarding same; review multiple Tabor correspondence to and from Sartell, Caddell, Francis, Soumilas regarding draft settlement agreement; respond; review Francis correspondence to and from Caddell, Tabor, Chapman, Soumilas, Sartell regarding qualified settlement fund; respond;	0.6	1075	\$645.00
Chapman, Cynthia	04/25/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Francis, Sartell, Soumilas, Caddell, Chapman, Tabor regarding revised settlement agreement and forwarding same; review multiple Tabor correspondence to and from Sartell, Caddell, Francis, Soumilas regarding draft settlement agreement; review Caddell response; review Francis correspondence to and from Caddell, Tabor, Chapman, Soumilas, Sartell regarding qualified settlement fund; review Caddell response;	0.4	850	\$340.00
Tabor, Amy	04/25/23	Settlement Talks and Conferences	Review and comment on draft settlement agreement; correspond via email with co-counsel regarding draft settlement agreement.	0.2	750	\$150.00
Kersh, Kathy	04/25/23	Pleadings and Service	Review new filing and download same to network	0.1	325	\$32.50
Caddell, Michael	04/26/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding cy pres language; review Sartell correspondence to and from Francis, Tabor, Caddell, Chapman, Soumilas forwarding draft long form settlement notice; review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding revised draft settlement agreement and forwarding a clean proposed final settlement agreement, redline against Sartelle's draft from yesterday with his changes accepted;	0.7	1075	\$752.50

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	04/26/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding cy pres language; review Sartell correspondence to and from Francis, Tabor, Caddell, Chapman, Soumilas forwarding draft long form settlement notice; review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding revised draft settlement agreement and forwarding a clean proposed final settlement agreement, redline against Sartelle's draft from yesterday with his changes accepted;	0.2	850	\$170.00
Caddell, Michael	04/27/23	Settlement Talks and Conferences	Review multiple Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas regarding draft long form settlement notice; review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding revised settlement agreement and draft long form settlement notice and forwarding same;	0.5	1075	\$537.50
Chapman, Cynthia	04/27/23	Settlement Talks and Conferences	Review multiple Tabor correspondence to and from Sartell, Francis, Caddell, Chapman, Soumilas regarding draft long form settlement notice; review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding revised settlement agreement and draft long form settlement notice and forwarding same;	0.3	850	\$255.00
Caddell, Michael	04/28/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding scheduling telephone call this morning; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding notice 23(b)(2) class members; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chaman, Tabor regarding final form of the settlement agreement and forwarding same;	0.4	1075	\$430.00
Chapman, Cynthia	04/28/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Rodman, Francis, Soumilas, Caddell, Chapman, Tabor regarding scheduling telephone call this morning; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding notice 23(b)(2) class members; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chaman, Tabor regarding final form of the settlement agreement and forwarding same;	0.2	850	\$170.00
Tabor, Amy	04/28/23	Settlement Talks and Conferences	Email and telephone correspondence with Jordan Sartell regarding amended draft settlement agreement.	0.3	750	\$225.00
Caddell, Michael	04/30/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas Caddell, Tabor, Chapman regarding getting client signature on settlement agreement; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding the 19 people;	0.3	1075	\$322.50
Chapman, Cynthia	04/30/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas Caddell, Tabor, Chapman regarding getting client signature on settlement agreement; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor regarding the 19 people;	0.1	850	\$85.00
Caddell, Michael	05/01/23	Settlement Talks and Conferences	Review Francis correspondence to and from Sartel, Soumilas, Caddel, Chapman, Tabor regarding 19 people, and math adjustment; review multiple Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor, Kabacinski forwarding near-final version of our motion for preliminary approval; review multiple Tabor correspondence to and from Caddell, Chapman regarding updated Caddell Declaration and forwarding same; t/conf w/ Tabor, Chapman; review Rodman correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Tabor regarding materials for today's filing of the settlement agreement papers and forwarding documents; review Motion to Certify Class for Settlement Purposes, Unopposed Preliminary Approval of Class Action Settlement; review Memorandum in Support of Motion to Certify Class;	1.4	1075	\$1,505.00
Chapman, Cynthia	05/01/23	Settlement Talks and Conferences	Review Francis correspondence to and from Sartel, Soumilas, Caddel, Chapman, Tabor regarding 19 people, and math adjustment; review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor, Kabacinski forwarding near-final version of our motion for preliminary approval; t/conf Tabor, Caddell;	0.8	850	\$680.00
Tabor, Amy	05/01/23	Settlement Talks and Conferences	T/conf w/ Caddell, Chapman regarding settlement, etc.;	0.6	750	\$450.00
Caddell, Michael	05/03/23	Settlement Talks and Conferences	Review Minute Order signed by Magistrate Judge Sheila K. Oberto on 5/3/2023: (Text Only Entry) the Court is in receipt of Plaintiff's motion for preliminary approval of class action settlement, filed May 1, 2023, and noticed for hearing on May 31, 2023, as amended effective March 1, 2022, the motion "shall be set for hearing on the motion calendar of the Judge or Magistrate Judge to whom the action has been assigned or before whom the motion is to be heard not less than thirty-five (35) days after service and filing of the motion" accordingly, the hearing on Plaintiff's motion is Continued to June 7, 2023, the time for filing and serving and opposition to, or reply in support of, the motion; review Francis correspondence to Caddell, Sartell regarding agreeing to consent to Oberto;	0.4	1075	\$430.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	05/03/23	Settlement Talks and Conferences	Review Minute Order signed by Magistrate Judge Sheila K. Oberto on 5/3/2023: (Text Only Entry) the Court is in receipt of Plaintiff's motion for preliminary approval of class action settlement, filed May 1, 2023, and noticed for hearing on May 31, 2023, as amended effective March 1, 2022, the motion "shall be set for hearing on the motion calendar of the Judge or Magistrate Judge to whom the action has been assigned or before whom the motion is to be heard not less than thirty-five (35) days after service and filing of the motion" accordingly, the hearing on Plaintiff's motion is Continued to June 7, 2023, the time for filing and serving and opposition to, or reply in support of, the motion; review Francis correspondence to Caddell, Sartell regarding agreeing to consent to Oberto;	0.2	850	\$170.00
Caddell, Michael	05/04/23	Settlement Talks and Conferences	Prepare correspondence to and from Francis, Sartell regarding agreeing to consent to Oberto;	0.2	1075	\$215.00
Chapman, Cynthia	05/04/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Francis, Sartell regarding agreeing to consent to Oberto;	0.1	850	\$85.00
Caddell, Michael	05/15/23	Settlement Talks and Conferences	Review Statement of Non-Opposition;	0.1	1075	\$107.50
Chapman, Cynthia	05/15/23	Settlement Talks and Conferences	Review Statement of Non-Opposition;	0.1	850	\$85.00
Caddell, Michael	05/19/23	Settlement Talks and Conferences	Review Notice regarding Certification of Motion under the Class Action Fairness Act;	0.1	1075	\$107.50
Chapman, Cynthia	05/19/23	Settlement Talks and Conferences	Review Notice regarding Certification of Motion under the Class Action Fairness Act;	0.1	850	\$85.00
Caddell, Michael	05/30/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Francis, Caddell regarding hearing next week; respond;	0.2	1075	\$215.00
Chapman, Cynthia	05/30/23	Settlement Talks and Conferences	Review Rodman correspondence to and from Francis, Caddell regarding hearing next week; review Caddell response;	0.1	850	\$85.00
Caddell, Michael	05/31/23	Settlement Talks and Conferences	Prepare correspondence to and from Francis, Rodman regarding hearing next week;	0.2	1075	\$215.00
Chapman, Cynthia	05/31/23	Settlement Talks and Conferences	Review Caddell correspondence to and from Francis, Rodman regarding hearing next week;	0.1	850	\$85.00
Caddell, Michael	06/01/23	Settlement Talks and Conferences	Review Order Vacating Hearing and Granting Unopposed Motion for Preliminary Approval of Class Action Settlement, Final Approval of the Proposed Settlement is set for 10/25/2023 at 09:30 AM in Courtroom 7; review Rodman correspondence to and from Francis, Caddell regarding same;	0.6	1075	\$645.00
Chapman, Cynthia	06/01/23	Settlement Talks and Conferences	Review Order Vacating Hearing and Granting Unopposed Motion for Preliminary Approval of Class Action Settlement, Final Approval of the Proposed Settlement is set for 10/25/2023 at 09:30 AM in Courtroom 7; review Rodman correspondence to and from Francis, Caddell regarding same;	0.2	850	\$170.00
Tabor, Amy	06/01/23	Motion Practice	Review preliminary approval order; calendar deadlines.	2.2	750	\$1,650.00
Caddell, Michael	06/02/23	Settlement Talks and Conferences	Review Sartell correspondence to and from defense counsel, co-counsel regarding Order Preliminarily Approving Settlement; review Francis correspondence to and from Sartell, Soumilas, Caddell, Brennan, Chapman, Tabor regarding same; prepare multiple responses; prepare correspondence to and from Francis, Rodman regarding Order;	0.3	1075	\$322.50
Chapman, Cynthia	06/02/23	Settlement Talks and Conferences	Review Sartell correspondence to and from defense counsel, co-counsel regarding Order Preliminarily Approving Settlement; review Francis correspondence to and from Sartell, Soumilas, Caddell, Brennan, Chapman, Tabor regarding same; review multiple Caddell responses; review Caddell correspondence to and from Francis, Rodman regarding Order;	0.2	850	\$170.00
Caddell, Michael	06/07/23	Settlement Talks and Conferences	Review Patel correspondence to and from defense counsel, co-counsel regarding the initial funding has been received;	0.1	1075	\$107.50
Chapman, Cynthia	06/07/23	Settlement Talks and Conferences	Review Patel correspondence to and from defense counsel, co-counsel regarding the initial funding has been received;	0.1	850	\$85.00
Caddell, Michael	07/13/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor, Kabacinski, Kersh, Rosado regarding upcoming petition for fees and costs; review Tabor correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Kabacinski, Kersh, Rosado, Labbe regarding Judge Oberto's order details;	0.2	1075	\$215.00

Timekeeper	Date	Category	Description	Hours	Rate	Lodestar
Chapman, Cynthia	07/13/23	Settlement Talks and Conferences	Review Sartell correspondence to and from Francis, Soumilas, Caddell, Chapman, Tabor, Kabacinski, Kersh, Rosado regarding upcoming petition for fees and costs; review Tabor correspondence to and from Sartell, Francis, Soumilas, Caddell, Chapman, Kabacinski, Kersh, Rosado, Labbe regarding Judge Oberto's order details;	0.2	850	\$170.00
Tabor, Amy	07/13/23	Motion Practice	Teleconference with Jordan Sartell regarding Motion for Attorneys' Fees; prepare email to co-counsel team regarding supporting information for Motion for Attorneys' Fees.	0.3	750	\$225.00
				1047.3		\$825,447.50

EXHIBIT B

Category	Total
Airfare	\$2,073.00
Court Costs	\$200.00
Database Hosting	\$790.38
Deliveries	\$644.69
Deposition Costs	\$6,352.14
Filing Fees	\$1,259.25
Hotel/Lodging/Accommodation	\$1,344.00
Meals	\$801.00
Mediation Services	\$450.00
Rental Car	\$586.00
Reproduction	\$930.60
Research Materials	\$2,308.10
Staff Services	\$235.08
Taxes, Tips, Internet, Misc.	\$276.00
Taxi & Parking	\$78.00
Telephone/Facsimile	\$55.06
Expert Witness	\$10,202.50
Postage	\$31.85
Service of Process	\$409.00
Grand Total	\$29,026.65