

EXHIBIT A

The Phelps Law Group

Time Records

Romanov v. Amazon.com Services LLC**Marc H. Phelps, Esq. - Total Hours**

Date	Activity	Time
8.19.19	Review contact from potential client L. Romanov regarding case circumstances; log contact record	.3
8.27.19	Email correspondence with L. Romanov re: case facts, review written summary of claims; review cases filed against Amazon for potential overlaps; legal research re: potential claims; prepare personnel file release request and send	4.9
8.28.19	Review <i>Dynamex</i> decision and opinions/interpretations of same (articles and blog posts); legal research regarding, and review court decisions re enforceability of Amazon arbitration agreement (Mass.); web research re: Amazon/drivers; prepare email to L. Romanov regarding same and evaluation of possible claims	4
8.29.19	Search for proper defendant contact for records request; email correspondence with L. Romanov; research safety issues brought up by client including OSHA standards	1.4
9.2.19	Email correspondence and telephone conference with L. Romanov re: potential association with CKS firm and co-representation terms	.4
9.3.19	Email correspondence with L. Romanov re: association of counsel	.1
9.9.19	Confer with co-counsel re: possible overlapping cases and further research of same; email to L. Romanov re: same; review emails provided by L. Romanov with employer; research re: corporate entity; review "seasonal delivery associate" and similar job postings to ascertain duties and pay structure	1.8
9.10.19	Email correspondence with co-counsel re: scheduling	.1
9.11.19	Conference call with L. Romanov and co-counsel re: case facts; preparation for call including review of file/information and applicable law; legal research	2
9.18.19	Review emails provided by client from Amazon re: leave of absence	.2
9.24.19	Emails with client re: status update	.1
10.7.19	Emails with client re: status update	.2
10.9.19	Emails with client re: status update	.1
10.10.19	Emails with client re: status update	.1
10.11.19	Email correspondence with co-counsel re: Amazon failure to respond to records request; LinkedIn contacts with Amazon attorneys and HR re: records request; emails with client re: same	.5
10.18.19	Email correspondence with co-counsel re: records request; send out revised request; confer with client	.5

10.28.19	Email correspondence with client re: status	.1
10.30.19	Email correspondence with client re: status	.1
12.4.19	Email correspondence with co-counsel re: strategy	.1
12.14.19	Email correspondence with co-counsel re: strategy	.1
12.17.19	Email correspondence with co-counsel re: strategy	.1
12.18.19	Review client bank records re: proper employer name; emails re: same	.3
12.30.19	Review payroll documents from client	.3
1.10.20	Email correspondence with co-counsel re: status; handle admin issues	.2
1.13.20	Prepare retainer agreement and send to L. Romanov; confer with L. Romanov re: same	.5
1.15.20	Review and revise draft complaint; legal research re: 17200; verify details with client; circulate	1.2
1.16.20	Review finalized complaint with additional edit by co-counsel; review/revise PAGA notice letter and format; emails re: same; confer with co-counsel	1
2.19.20	Review court order rules and dates, circulate, calendar, confer with co-counsel	.8
2.26.20	Email correspondence with client re: status	.1
3.6.20	Review notice of association of counsel; confer with co-counsel re: same	.4
3.19.20	Email correspondence with client re: status	.1
3.23.20	Email correspondence with client re status; review notice of removal and research potential remand arguments and confer re: same	2
3.25.20	Email correspondence with client re: admin issues	.1
3.26.20	Confer with client re: remand and strategy; review judicial assignment	.5
4.6.10	Review initial standing order of court; review Defendant's answer	.4
4.8.20	Review draft notice of interested parties	.1
4.22.20	Review court order re: OSC re remand	.2
5.6.20	Review court order re: calendaring; emails re same; provide notice	.3
6.1.20	Review client factual summary/timeline/witness list and confer with client re: same	1.3
6.2.20	Prepare initial disclosure statement; review client documents re: same	1
6.3.20	Strategy re: filing of PAGA cause of action (same or separate action); research; emails re same; emails with co-counsel re admin; prepare rule 26(f) report plaintiff portions (review of documents, witness list, file, complaint re same)	3.4
6.4.20	Review/revise joint rule 26(f) report; emails	1

6.16.20	Review and finalize initial disclosures; emails	.4
6.18.20	Review Defendant's initial disclosure statement	.3
6.23.20	Review draft FAC adding PAGA claim, stipulation and order	.3
8.24.20	Review answer to FAC filed by Defendant	.2
8.26.20	Review Plaintiff RFP; confer with client re: same	.5
9.4.20	Review Plaintiff RPD and PMQ deposition notice; review documents and witness list provided by client re: additional items needed; research	2
9.12.20	Email correspondence with client re: status	.1
9.13.20	Email correspondence with client re: status	.1
10.1.20	Review notice of judicial reassignment; research re same; emails	1.2
10.17.20	Review order and calendar	.3
11.3.20	Review Defendant discovery responses and draft protective order	1.5
11.23.20	Review settlement communication; provide input on pre-mediation discovery requests including review of documents obtained vs. documents needed	1.8
12.3.20	Review draft joint discovery report and provide input	.5
12.10.20	Emails with co-counsel re: hearing	.1
12.11.20	Review summary of hearing from co-counsel; emails	.3
1.22.21	Review order re: stipulation of continuance	.1
2.12.21	Telephone conference with class member/witness re facts; emails with co-counsel re same; research position/possible inclusion in other cases/classes	1.7
2.16.21	Review correspondence re: discovery timeline, dates and discovery; review mediation paperwork	1
2.17.21	Confer with co-counsel re strategy; review file re needed items	1
3.3.21	Conference call re discovery dates/timeline; emails re same; review needed items; confer with client	1.5
3.13.21	Review Defendant's discovery requests; review discovery produced; confer with client re same	2
3.19.21	Email correspondence re: deposition availability	.1
4.6.21	Emails with co-counsel re: mediation preparation; confer with client	.3
4.16.21	Emails with co-counsel re: valuation/damages	.2
4.19.21	Telephone conferences with class members (mediation preparation)	.9
4.21.21	Telephone conferences with class members (mediation preparation); review initial damages model prepared by expert; review experience summaries; confer re: same	3.7
4.22.21	Mediation preparation; confer with co-counsel re: same	2
4.23.21	Prepare for and attend mediation (via Zoom)	4.6

4.27.21	Review draft MOU	.3
5.3.21	Email correspondence re: MOU/revisions	.1
5.7.21	Review order vacating deadlines	.1
5.27.21	Provide MOU to client for signature; confer	.5
6.15.21	Email correspondence with client re: timeline for settlement approval	.2
6.18.21	Review settlement documents (Drafts)	.5
7.20.21	Review Defendant's edit to draft settlement agreement	.4
7.25.21	Prepare declaration supporting preliminary approval motion	.8
7.27.21	Confer with client; prepare draft Romanov declaration supporting preliminary approval in conjunction with conversation; send for edits/review	1.5
8.5.21	Review edits from co-counsel to client declaration; emails re same; finalize and execute own declaration	.8
8.9.21	Confer with client re: obtaining signature; admin; emails	.3
8.31.21	Confer with client re: status/timeline	.3
10.1.21	Review summary of MPA hearing prepared by co-counsel	.2
10.4.21	Provide hours and costs to co-counsel	.2
10.8.21	Review revised motion/defense redlines and emails	.5
10.19.21	Review scheduling notice/order	.1
10.20.21	Review revised settlement date timeline; emails	.2
10.21.21	Review email correspondence re: settlement administration	.1
12.21.21	Telephone conference with class member re: settlement administration	.1
12.23.21	Review weekly report/claims administration	.1
1.3.21	Review weekly report/claims administration	.1
1.7.21	Review weekly report/claims administration	.1
1.19.22	Prepare declaration in support of final approval and finalize time and costs	1.5
1.19.22	Estimated additional work through final approval and finalization of settlement	3
	Total:	73.4
	73.4 hours @ \$600/hour = \$44,040	