

EXHIBIT 2

**Cohelan Khoury & Singer
Time Records**

EXHIBIT 2-A
ATTORNEY TIME
TIMOTHY D. COHELAN

Romanov v. Amazon.com Services LLC
U.S.D.C. Case No. 2:20-cv-02692 SB (KSx)
Attorney Time Timothy D. Cohelan

Date	Activity	Time
11/24/20	Review e mails re status of case	.8
4/19/21	Review status of case	.5
4/20/21	Conference regarding claims and damage model re same	.8
6/3/21	Discussion regarding class representative issues	.7
8/3/21	Settlement processing discussion	.8
9/29/21	Prehearing review and discussions	.7
	Total:	4.3

EXHIBIT 2-B
ATTORNEY TIME
ISAM C. KHOURY

Romanov v. Amazon.com Services LLC
U.S.D.C. Case No. 2:20-cv-02692 SB (KSx)
Attorney Time Isam C. Khoury

Date	Activity	Time
3/3/20	New case discussion and association terms	.5
3/24/20	Review Notice of removal	.2
5/28/20	Status update on scheduling order and overview of rule 26 discussions and production	.5
6/18/20	Approve Plaintiff's initial disclosures	.3
7/8/20	Status update on FAC and stipulation	.2
9/4/20	Update on discovery progress and supp ROGs, RPDs, RFAs	.2
10/5/20	Update on privacy notice and stay discussions	.4
10/28/20	Review approve Pl's discovery responses	.3
11/23/20	Memo from JH re discussion and mediation potential data request items, discuss, outline data for claims	.5
12/3/20	Status update w/JH and work on declaration	.3
1/12/21	Advise on mediator selection and discussions w./ Defendant	.3
1/15/21	Confirm mediator selection. Michael Young, calendar	.2
2/17/21	Update on formal discovery and mediation agreements	.4
4/16/21	Status update on mediation data analysis and prep, review data from defendant, email to co-counsel	1
4/19/21	Discuss mediation brief issue and damage calcs	.8
4/22/21	Work on damage model and brief editing, and extra \$1 issue, email to defense, class damages extrapolations from data analysis	3.5
4/23/21	Mediation and pre-mediation prep	6.5
5/3/21	Review, discuss MOU and release period	.4
6/3/21	Email to co-counsel re client's concerns	.3
7/30/21	Memo to DML re prelim approval issues and mediation data, mediation negotiation summary	1
8/3/21	Update on settlement processing and Kullar analysis	.3
8/3/21	Work on Kullar analysis	1
8/4/21	Continue edits to brief	1
8/17/21	Update on stipulation execution	.2
9/29/21	Pre-hearing Overview discussion w/ DMK	.4
10/4/21	Discuss Court's concerns and settlement value assessment criteria	.4
10/8/21	Work on revisions and discuss defense Edits	.5
	Total:	21.6

EXHIBIT 2-C
ATTORNEY TIME
MICHAEL D. SINGER

Romanov v. Amazon.com Services LLC
U.S.D.C. Case No. 2:20-cv-02692 SB (KSx)
Attorney Time Michael D. Singer

Date	Activity	Time
9/1/19	Review intake from referring counsel .5; research re W-2 driver issue 1.2	1.7
9/18/19	Follow up re records request .3; status review .2	.5
10/15/19	Analysis of referring counsel memo .2; status review .2	.4
10/17/19	Email referring counsel .1	.1
10/18/19	Emails w referring counsel re records .3	.2
12/9/19	Case analysis for PAGA letter and filing 1.0	1.0
1/13/20	Review and revise draft complaint 1.2	1.2
1/16/20	Correspondence w referring counsel .5	.5
1/29/20	Status review/correspondence w referring-counsel .5	.5
3/6/20	Admin association of counsel and appearance .5	.5
3/23/20	Correspondence review .5	.5
3/25/20	Analysis of removal petition .9	.9
4/24/20	Status review .5; review OSC re jurisdiction .2	.7
5/28/20	Correspondence review .5; status update .2	.7
6/3/20	Analysis re PAGA claim amendment .5	.5
6/18/20	Review initial disclosures .3; status review .5	.8
6/19/20	Review defense disclosures .2.	2
7/10/20	Status review re FAC .3	.3
7/21/20	Review FAC for filing .3	.3
9/4/20	Status review .5; review discovery outgoing .3.	8
10/5/20	Review proposed protective order .3; status review .5	.8
10/29/20	Analysis of discovery responses .8	.8
11/24/20	Mediation request analysis .5; status review .5	1.0
12/2/20	Review Joint Rule 26 report .3	.3
1/12/21	Status review .5	.5
2/6/21	Mediation admin .2; status review .5	.7
3/10/21	Mediation data correspondence .3	.3
4/15/21	Analysis of data 1.0; mediation prep 2.0	3.0
4/16/21	Mediation prep 2.0	2.0
4/20/21	Confer w defense re-records .2; confer re mediation prep .2; mediation prep 3.0	3.4
4/21/21	Mediation prep 7.0	7.0
4/22/21	Damage model prep for mediation 5.0; analysis of driver interviews .5	5.5
4/23/21	Mediation 5.5	5.5
6/30/21	Settlement status review .2.	.2
	Total:	52.3

EXHIBIT 2-D
ATTORNEY TIME
DIANA M. KHOURY

Romanov v. Amazon.com Services LLC
U.S.D.C. Case No. 2:20-cv-02692 SB (KSx)
Attorney Time - Diana M. Khoury

Date	Activity	Time
5/13/21	Notice of appearance;	.1
5/27/21	Emails t/f admin	.1
6/15/21	Cf JJH re: MOU/agreement/settlement folders; costs;	2.8
6/17/21	Draft settlement agreement; emails t/f co-counsel;	7
6/18/21	Bids for admin; exhibits; revise agreement – emails t/f co-counsel	6.2
6/22/21	Simpluris bid, review, cf JJH	.4
6/22/21	Review Simpluris bid, CPT bid	.2
7/2/21	Cf JJH; stip / continue; review and edits and return	.7
7/8/21	Personal appearance required for SC; emails t/f all	.2
7/10/21	Co-counsel re: declarations; class rep decl; etc.	.2
7/12/21	Edit SA, notice; update summary; forward to OC; bid from Rust	3.5
7/21/21	Emails f/t OC re: agreement; status; information	.2
7/22/21	Review OC edits to SA, emails t/f co-counsel - declarations; etc.	4.3
7/23/21	Finish review of defense edits to SA, and return; start motion	2
7/26/21	Co-counsel declarations;	1.3
7/27/21	Emails f/t OC re: Simpluris bid; DMK SA edits; prelim approval motion; requested revised bid; emails t/f co-counsel re: declarations/drafts	5.1
7/30/21	Emails t/f OC re: final SA to sign, and other requests; Simpluris declaration;	2.7
8/2/21	Emails f/t defense re: info needed for motion; extend response d/l; exhibits, notice, COA, final draft of MPA	5.9
8/3/21	Cf ICK re: MPA draft;	3.5
8/4/21	Forward MPA to OC	.2
8/5/21	Review, revise class rep declaration; email t/f defense re: edit to exhibits, CAFA notice	1.5
8/6/21	MPA returned w/OC edits, revised numbers; revise prelim order; MDS decl (TBF 8/9/21)	2.5
8/17/21	Emails t/f defense re: signatures	.2
9/30/21	Prep for hearing / travel to L.A. (5 hrs to LA)	1
10/1/21	Prelim Approval Motion - travel to S.D.	4.5
10/4/21	Emails t/f OC re: TPCF;	.6
10/5/21	Tpcf OC; research, brief	1.0
10/6/21	Supplemental brief	6.5
10/7/21	Cf ICK / edits; forward to OC	1.5
10/8/21	Emails t/f co-counsel; emails t/f OC re: brief; review; supplemental brief	3.8
10/11/21	Forward supp brief and Exhibits to OC for review	.2
10/12/21	Review supp papers; file	.2

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Attorney Time - Diana M. Khoury

10/14/21	Emails t/f OC and Admin	.2
10/18/21	Prelim Hrg vacated (ECF 51)	.2
10/20/21	Email from clerk re: dates if FA were 2/18/22; emails t/f defense re: timeline per court's request; need to move FA to later date 3/18/22; email to clerk	1.3
10/21/21	Order Granting Prelim Approval (ECF 52) w/FA 2/11/22; emails t/f OC; seek clarification from Court re: FA date; receipt and review of Amended Order Granting Preliminary Approval – FA: 3/25/22 @ 8:30 a.m.	1.6
11/11/21	Emails t/f OC re: dates; opt out, deadlines; admin; calculation of interest; emails t/f damages consultant; protocol, etc.; emails t/f co-counsel re: fees' motion/declarations	1.8
12/13/21	Admin emails; notice Packets mailed to class	.3
12/23/21	Status report	.2
1/3/22	Status report; email admin	.3
1/7/22	Status report	.2
1/10/22	Emails t/f co-counsel re: fees' motion; supplemental time/costs to be filed 1/25/22	.2
1/17/22	Emails t/f admin re: declaration re: mailing; email co-counsel	.7
1/19/22	Fees' motion; emails t/f co-counsel; emails t/f admin re: edits to declaration	8.5
1/24/22	Fees' motion; DMK declaration; edits to motion and order	3.9
	Total:	89.5

EXHIBIT 2-E
ATTORNEY TIME
J. JASON HILL

Romanov v. Amazon.com Services LLC
U.S.D.C. Case No. 2:20-cv-02692 SB (KSx)
Attorney Time – J. Jason Hill

Date	Activity	Time
12/10/19	Intake of case, Discussion with counsel, Review and Analysis of claim from RC/MP	3.2
12/19/19	Interview Plaintiff, Draft summary	2.0
12/20/19	Review and Assess proper Defendant (AMZ) Confirm w-2 Driver Status for CA	1.1
12/21/19	Review AMZ articles on Driver Treatment in CA	1.1
1/15/20	Draft and Revise PAGA Notice to LWDA w/MP	1.9
1/20/20	Review and Revise Initial Complaint by RC/MP	2.1
2/3/20	Confirm JPA. Confirm Rep. of Romanov adding CKS	2.0
3/6/20	Draft and revise final JPA and NOA of CKS counsel	.9
3/25/20	Review Removal Notice, Draft memo on Remand	3.1
3/26/20	Prepare NOA CKS for Case	.5
4/2/20	Confer with RC/MP on Remand issues, Confirm	1.2
4/6/20	Review OSC Response by AMZ and Brown Dec.	.4
4/8/20	Preparation and Drafting proposed Remand Motion	7.3
4/10/20	Confirm Data in Ayres, Brown & Fischer Declarations and Conference with Co-Counsel on Remand	1.1
4/10/20	Draft and serve No Continuance of SC	.6
4/28/20	Review Ntc of Interested Parties, confer as to Joinder	.4
5/8/20	Draft and serve Ntc Vacating ISC / Removal (LA)	.8
6/17/20	Review file, confer with Client and Draft FRCP Rule 26 Disclosures	3.3
6/18/20	Review, assess and summarize AMZ Rule 26 Disc.	2.0
7/21/20	Draft FAC with PAGA COA's, review and circulate	3.5
7/22/20	Draft Stipulation and Order (proposed) for AMZ To permit Filing FAC (PAGA); Confer and Revise	1.3
8/26/20	Review and Assess AMZ Answer and AFF/Defs.	.9
8/26/20	Prepare Summary of Aff. Defs and Discovery issues	.8
8/27/20	Preparation and Drafting RFP, SROG, RFA and 30(b)	5.2
9/3/20	Confer, Revise and Finalize RFP, SROG, RFA and 30(b)	2.1
9/3/20	Review all Judge Blumenfeld's Standing Order and Chamber rules on Discovery/Scheduling	.9
10/28/20	Review and Revise proposed AMZ Protective Order	1.1
10/29/20	Review, analyze and Prepare Summary of AMZ Responses to SROG, RFP, RFA and ROG2	5.7
10/30/20	Draft M/C with Defense and prepare Letter	2.0
10/30/20	Confer re: Potential Mediation and Mediators	.8
11/15/20	Review of Case/Developments	2.0
12/10/20	Confirm Mediation Potential and Mediators	.7
12/12/20	Prepare and finalize Mediation Data Request For AMZ counsel	3.2
3/2/21	Conference with all Counsel (Mediation and Scheduling Order Modification)	1.2

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Attorney Time – J. Jason Hill

3/10/21	Confirm Mediation Data Request and Confer with AMZ Counsel to Clarify	2.0
3/19/21	Plaintiff conference with client on deposition and Mediation – Risks and Benefits, Summary of Same	1.7
3/24/21	Preparation and Drafting Meet/Confer on Discovery/mediation Data Progress and P.O.	3.3
4/6/21	Confer with AMZ counsel on DATA, Discovery Scheduling Order and Renewed Request to allow Extension of Scheduling Order with summary of same	2.0
4/14/21	Preparation and Drafting Initial Mediation Brief	6.7
4/15/21	Obtain, Review, Analyze Initial Mediation Data from AMZ, Draft Overview Summary re: same	4.5
4/19/21	Confirm Consultant Signed PO/Confidentiality and Confer with JGlick Re: Driver DATA	1.8
4/20/21	Review Sample of Contact Data of PCM's and Prepare script for outreach on Issues for Case	2.1
4/20/21	Multiple Communications with Sample of PCM's on issues related to AMZ Driver Duties and Pay/Wage Issues	6.8
4/21/21	Contact PCM's on Sample Contact List and Prepare summary of issues discussed for Mediation	5.9
4/23/21	Revise and Finalize Mediation Brief for Young; Prepare and redact Exhibits, Submit	7.3
4/27/21	Review and Assess proposed MOU from Mediation	2.2
4/27/21	Confer with counsel on issues of MOU for Settlement	.9
5/3/21	Conference with RC/MP, Client and CKS / MOU Terms	1.5
5/27/21	Confirm MOU terms Acceptable with all, Finalize	1.7
6/15/21	Prepare Summary of Case for MPA to assist DMK	2.9
7/22/21	Multiple Correspondence Review and Respond on SA and MPA with all counsel/client	1.1
7/23/21	Drafting MPA Declarations and Review MPA Draft	5.4
8/3/21	Drafting Complete Summary of Investigation for MPA	4.0
8/4/21	Confer with DMK on MPA Supporting Declarations Exhibits and Disclosures w/o Violating P.O.	1.3
8/27/21	Confer with Client and Co-Counsel on Final Settlement Agreement	.8
9/15/21	Meet with DMK on Motion for Preliminary Approval	1.4
10/1/21	Confer with DMK (CKS) on Basis for Settlement and Court's Tentative Instructions for Supp. Briefing	.5
	Total:	134.2