

EXHIBIT D

Sean S. Vahdat Loadstar Hours Re: Kirkpatrick v. AMFM

July 26 2021 – Final Hearing Date

Initial Call with Client

Interview Client

Research Defendant

Draft Summons Complaint PAGA

LWDA Notice

Review Court's Ruling

Service of Process

Multiple Conference Calls With Defense

Calls with Client Re: Witnesses, Documents

Call With Defendants in House Counsel

Review Answer

Request For Admissions

Request For Production

Interrogatories

Joint CMC statement

Joint Status Reports

Joint Statement

CMC

Review Notice of Related cases

Meet & Confer Re: Motion to Compel Arbitration on Hegemier & Stay

Review Records and Arbitration Agreement with Client

Review Motion to Compel Arbitration on Hegemier

Review Opposition to Motion to Compel Arb

Review Documents from Court's Ruling

Informal Discovery Request

SC Statements

Draft & File Motion to Consolidate

Review Defenses Opposition to Motion to Consolidate

Court Hearing on Motion to Consolidate

Multiple Conferences with Defense Counsel

Research Mediators

Agree on Mediator

Conference Call & Emails with Hegemier Counsel

Meet & Confer letters Re: Discovery Responses

Draft Motion Compel Responses & For Sanctions

Interview and choose Expert

Hire Expert Witness

Multiple Emails with Expert Witness

Multiple Calls With Expert Witness

Review Expert Final Report

Review and finalize MOU

Review and Finalize Settlement Agreement
Meet & confer Re: Settlement Terms
Amendments to Settlement Agreement
Stipulation Re: Errors/Non-material changes
Filing, Scheduling, Post Office, scanning, etc.
Draft & File Motion For Approval
Notices/Declarations/ etc.
Review Case History
Conference Calls with Defense Counsel Re: Dates
Final Approval Hearing Pending
Future Events Pending
Emails/Calls = Defense Counsels, Client, Co-Counsels

Total Attorney Hours Approximately: $120 \times \$800 = \$96,000.00$

Total Paralegal Hours Approximately $28 \times \$175 = \$4,900.00$

Future Estimated Hours = $30 \times \$24,000.00$

Total Hours = 178

TOTAL = \$124,900.00