

EXHIBIT 9

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CIVIL MINUTES—GENERAL

Case No.	EDCV 19-2124 JGB (SPx)	Date	July 8, 2022
Title	<i>Reginald Moore, et al. v. Universal Protection Service, LP d/b/a Allied Universal Security Services</i>		

Present: The Honorable	JESUS G. BERNAL, UNITED STATES DISTRICT JUDGE
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MAYNOR GALVEZ

Deputy Clerk

Not Reported

Court Reporter

Attorney(s) Present for Plaintiff(s):

None Present

Attorney(s) Present for Defendant(s):

None Present

Proceedings: Order (1) GRANTING Plaintiffs' Motion to Confirm Award (Dkt. No. 247); and (2) VACATING the July 11, 2022 Hearing (IN CHAMBERS)

Before the Court is an unopposed motion to confirm award filed by Plaintiffs Reginald Moore, Eduardo Guerra, and Alisa Jones (collectively, "Plaintiffs"). ("Motion," Dkt. No. 247.) The Court determines this matter appropriate for resolution without a hearing. See Fed. R. Civ. P. 78; L.R. 7-15. After considering the papers filed in support of the Motion, the Court GRANTS the Motion. The Court VACATES the hearing set for July 11, 2022.

I. BACKGROUND

On November 5, 2019, Plaintiffs commenced this action against Universal Protection Service, LP d/b/a Allied Universal Security Services ("Defendant"). ("Complaint," Dkt. No. 1.) Plaintiffs amended the Complaint on November 19, 2019. ("FAC," Dkt. No. 23.) The FAC alleged violations of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§ 201-219, and violations of California and Colorado state law. (Id.)

On November 6 and 7, 2019, Plaintiffs filed consent to join forms for Milagros Almonte, Denise Aquino, Crystal Brandly, Damaura Christian, Austin Salle, Nancy Sindar, Esther Shipley, Robert Snyder, and Erica McGee. (Dkt. No. 11.) Consent to join forms followed for Tonya Brown, Christina Capstraw, David Capstraw, II, Jalee Outlaw, Bernard Tyree, James Boggs, Ronald Burkhammer, Alice Dawson, Anicia Grant, Tanesha Johnson, Andrew Moses, Darrius Patterson, Donald Sandoval, Michael Smith, Khristian Thornton, Taminka White, Brian

Wilburn, King Bando, Angel Grant, Dennis Clay, Levi DeMasi, Justin LeBlanc, Kimberly Adam, Beatrice Augusta, Shakamree Cauthren, Johnthan Fuller, Salvador Munoz, Brian Rodney, John Titus, and John Vandewater. (Dkt. Nos. 17, 18, 40, 41, 43, 44, 46, 66.)

On May 15, 2020, the Court granted Plaintiffs' motion to certify a collective action under the FLSA. ("May 15, 2020 Order," Dkt. No. 106.) The Court conditionally certified the following putative FLSA class:

All current and former non-exempt, hourly-paid security guard employees who worked at any location nationwide at any time within the three years prior to the date of filing of [this Order] through the date of the final disposition of this action who were denied minimum and/or overtime wages in connection with Defendant's policy and/or practice of requiring mandatory pre- and post-shift work to be completed off-the-clock without any compensation.

(May 15, 2020 Order at 12.) In the May 15, 2020 Order, the Court also granted Defendant's motions and petitions to compel arbitration, except as to the PAGA claims, and denied Defendant's motion to stay the entire action. (Id.)

On June 22, 2020, Plaintiffs filed a second amended complaint. ("SAC," Dkt. No. 117.) The SAC alleges claims by Mr. Moore and Mr. Guerra on behalf themselves and of a putative California class ("California Plaintiffs"), and by Ms. Jones on behalf of herself and of a putative Colorado class ("Colorado Plaintiffs"). The SAC asserts ten causes of action as follows:

All Plaintiffs allege:

- (1) violations of overtime and minimum wage provisions and payroll record-keeping requirements of the FLSA.

In addition, California Plaintiffs allege the following California law violations:

- (2) violations of California's Unfair Competition Law ("UCL"), Cal. Bus. & Prof. Code §§ 17200-17210;
- (3) California minimum wage violations under Cal. Wage Order No. MW-2019 and Cal. Labor Code §§ 1182.11, 1182.12, & 1194;
- (4) California overtime violations under Cal. Wage Order No. 5-2001/7-2001; Cal. Labor Code §§ 510, 1194;
- (5) California meal and rest break violations under Cal. Wage Order No. 4-2001 and Cal. Labor Code §§ 218.5, 226.7, & 512;
- (6) California record-keeping violations under Cal. Wage Order No. 5-2001/7-2001 and Cal. Labor Code §§ 226, 1174, & 1174.5;
- (7) California wage payment violations under Cal. Labor Code §§ 201, 202, & 203; and
- (8) California Private Attorney General Act ("PAGA") violations under Wage Order No. 5- 2001/7-2001 and Cal. Labor Code §§ 2698-2699.5.

Colorado Plaintiffs allege the following Colorado law violations:

- (9) Colorado minimum wage violations under the Colorado Wage Claim Act (“CWCA”), Colo. Rev. Stat. § 8-4-101 – 8-4-123, the Colorado Minimum Wage Act (“CMWA”), Colo. Rev. Stat. § 8-6-101 – 8-6-119, and Colorado Minimum Wage Order Number 35 (“CMWA”), 7 Colo. Code Regs. § 1103-1; and
- (10) Colorado overtime violations under the CWCA and CMWA.

(See SAC.) After filing the SAC, Plaintiffs filed additional consent to join forms for 29,107 individuals to opt-in as plaintiffs. (Dkt. Nos. 120–201, 205–216, 218–221, 223–236.) The Court refers to all those who have opted in as “Opt-In Plaintiffs.”

On June 24, 2021, the Court approved the parties’ stipulation to stay the case pending approval of a settlement agreement the parties had reached pursuant to arbitration. (“Stay Order,” Dkt. No. 245.)

On December 16, 2021, Plaintiffs filed this Motion, seeking to lift the Stay Order and to confirm the arbitration award. (See Mot.) In support of the Motion, Plaintiffs filed the December 15, 2021 order by the arbitrator approving the parties’ settlement agreement. (“Arbitration Award,” Dkt. No. 247-1.)

As discussed above, on January 1, 2022, the Court granted in part the Motion with respect to lifting the stay, but reserved ruling on Plaintiffs’ request to confirm the arbitration award. (See Lift Stay Order.)

On February 3, 2022, the Court granted the parties’ stipulation for Plaintiffs to file a third amended complaint. (Dkt. No. 251.) On February 2, 2022, Plaintiffs filed a third amended complaint. (“TAC,” Dkt. No. 252.)

On February 21, 2022, Plaintiffs filed supplemental documents in support of the Motion. (Dkt. No. 253.) Specifically, they filed the following documents:

- Unopposed Motion for Approval of FLSA and PAGA Settlement (“Supplemental Brief,” Dkt. No. 253-1)¹;
- Class Action Settlement Agreement (“Settlement Agreement,” Dkt. No. 253-2);
- Declaration of Melinda Arbuckle (“Arbuckle Declaration,” Dkt. No. 253-3);
- The Settlement Agreement from Hakeem, et al. v. Universal Prot. Serv., L.P., Case No. 34-2019-00270901, Superior Court for the County of Sacramento;
- Plaintiffs’ Proposed Third Amended Complaint (“Proposed TAC,” Dkt. No. 253-5); and

¹ The Court reminds Plaintiffs that all documents presented to the Court must use a font size “14-point or larger,” including in the footnotes. L.R. 11-3.1.1. Footnotes in the Supplemental Brief are in a smaller size font.

- Arbitration Award (“Arbitration Award,” Dkt. No. 253-6).

On June 2, 2022, the Court ordered Plaintiffs to file supplemental briefing to address whether the Settlement Agreement resolves bona fide disputes, as required under the FLSA. (Dkt. No. 257.) In response, Plaintiffs filed a supplemental brief on June 7, 2022. (“2d Supplemental Brief,” Dkt. No. 258.)

On June 9, 2022, the Court ordered Plaintiffs to file documentation in support of their requested attorneys’ fees and costs. (Dkt. No. 259.) Plaintiffs filed the requested documentation on June 29, 2022. (“Arbuckle Fee Request Declaration,” Dkt. No. 262.)

II. LEGAL STANDARD

A. FLSA Settlement Approval

The FLSA establishes federal minimum-wage, maximum-hour, and overtime guarantees that cannot be modified by a contract. Beidleman v. City of Modesto, 2018 WL 1305713, at *1 (E.D. Cal. Mar. 13, 2018) (citing Genesis Healthcare Corp. v. Symczyk, 569 U.S. 66, 69 (2013)). Employees cannot waive FLSA claims for fear that employers may coerce them into settlement and waiver. Selk v. Pioneers Mem’l Healthcare Dist., 159 F. Supp. 3d 1164, 1172 (S.D. Cal. 2016) (quoting Lopez v. Nights of Cabiria, LLC, 96 F. Supp. 3d 170, 175 (S.D.N.Y. 2015)). They may settle such claims only if settlement is approved by a federal district court or supervised by the Secretary of the U.S. Department of Labor. Id.

The Ninth Circuit has not established specific criteria for approving FLSA settlements. Beidleman, 2018 WL 1305713, at *2. Courts in this circuit have instead relied on the standard adopted by the Eleventh Circuit, which considers whether a “settlement represents a ‘fair and reasonable resolution of a bona fide dispute.’” Selk, 159 F. Supp. 3d at 1172 (quoting Lynn’s Food Stores, Inc. v. United States, 679 F.2d 1350, 1355 (11th Cir. 1982)). “A bona fide dispute exists when there are legitimate questions about ‘the existence and extent of Defendant’s FLSA liability.’” Id. (quoting Ambrosino v. Home Depot U.S.A., Inc., 2014 WL 1671489, at *1 (S.D. Cal. Apr. 28, 2014)). “A court will not approve a settlement ... [if] there is certainty that the FLSA entitles plaintiffs to the compensation they seek, because it would shield employers from the full cost of complying with the statute.” Beidleman, 2018 WL 1305713, at *2.

If a bona fide dispute exists, a court may assess the settlement under the factors used to evaluate a proposed class action settlement pursuant to Federal Rule of Civil Procedure 23 (“Rule 23”). Seguin v. County of Tulare, 2018 WL 1919823, at *2 (E.D. Cal. Apr. 24, 2018). However, application of the Rule 23 factors alone “runs the risk of not giving due weight to the policy behind the FLSA.” Selk, 159 F. Supp. 3d at 1173. Accordingly, courts apply “a totality of circumstances approach” to FLSA settlements, looking to: (1) the plaintiff’s range of possible recovery; (2) the stage of proceedings and amount of discovery completed; (3) the seriousness of the litigation risks faced by the parties; (4) the scope of any release provision in the settlement agreement; (5) the experience and views of counsel and the opinion of participating plaintiffs;

and (6) the possibility of fraud or collusion. Id. If, under these factors, “the settlement reflects a reasonable compromise over issues that are actually in dispute,” then “the court may approve the settlement.” Id.

B. PAGA Settlement Approval

Any settlement of a PAGA action requires court review and approval. Cal. Labor Code § 2699(l)(2). California courts, legislature, and agencies have not “provided any definitive answer” to what standards apply for approval of a PAGA settlement. Flores v. Starwood Hotels & Resorts Worldwide, Inc., 253 F. Supp. 3d 1074, 1075 (C.D. Cal. 2017). However, “when a PAGA claim is settled, the relief provided for under the PAGA [must] be genuine and meaningful, consistent with the underlying purpose of the statute to benefit the public and, in the context of a class action, the court [must] evaluate whether the settlement meets the standards of being ‘fundamentally fair, reasonable, and adequate with reference to the public policies underlying the PAGA.’” O’Connor v. Uber Tech., Inc., 201 F. Supp. 3d 1110, 1133 (N.D. Cal. 2016) (quoting the California Labor and Workforce Development Agency (“LWDA”). The parties must also submit the settlement to the LWDA. Cal. Labor Code § 2699(l)(2).

III. DISCUSSION

A. FLSA

The Court examines (1) whether a bona fide dispute exists between the parties, and (2) whether the Settlement Agreement is fair and reasonable in the totality of circumstances.

1. Bona Fide Disputes

The Court finds that there are legitimate questions about the existence and extent of Defendant’s FLSA liability. The parties disagree on substantive and procedural issues. Substantively, they dispute whether: (1) any Plaintiff worked off-the-clock, (2) such work is compensable or de minimis, (3) Defendant instructed employees not to work off-the-clock pursuant to its policy or practice, (4) Defendant acted willfully, and (5) Plaintiffs’ entitlement to liquidated damages. (2d Suppl. Br. at 3–4.) Procedurally, the parties dispute whether a class of Plaintiffs could include California class members and whether the matter should have been arbitrated. (Id. at 5–6.) These issues regarding “FLSA coverage or computation of back wages” constitute bona fide disputes. Nen Thio v. Genji, LLC, 14 F. Supp. 3d 1324, 1333 (N.D. Cal. 2014). Accordingly, Plaintiffs have demonstrated bona fide disputes.

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2. Proposed Settlement Is Fair and Reasonable

a. Plaintiffs' Range of Possible Recovery

First, “[a] district court evaluates the plaintiff’s range of potential recovery to ensure that the settlement amount agreed to bears some reasonable relationship to the true settlement value of the claims.” Selk, 159 F. Supp. 3d at 1174 (citations omitted).

Here, the Settlement Agreement establishes a gross settlement fund of \$4,350,000.00, which will be apportioned as follows:

- Net Settlement Fund: \$1,503,596.00
- Class Representative Payments: \$20,000.00
- Settlement Administration Costs: \$573,350.00
- Other Costs: \$13,054.00
- Attorneys’ Fees: \$1,740,000.00
- PAGA Penalties: \$500,000.00

(Suppl. Br. at 3–5; Settlement Agreement ¶¶ 33–38.)

The Court finds that the range of recovery provided by the Settlement Agreement is fair and reasonable. Each Opt-In Plaintiff will receive a share of the Net Settlement Fund based on the number of workweeks worked during the Class Period. (Id. at 4; Settlement Agreement ¶¶ 22, 39.) Of the 29,107 Opt-In Plaintiffs, the average Plaintiff will recover approximately \$52.00. (Suppl. Br. at 13.) Any Opt-In Plaintiff who did not work for applicable weeks will receive a payment of \$20.00. (Settlement Agreement ¶ 39(c).) Plaintiffs argue that because certain “gap time” claims are not recognized under the FLSA, these payments allow even individuals who did not work the minimum number of hours to still recover. (Suppl. Br. at 13.)

In addition, the three Named Plaintiffs and Opt-In Plaintiff Dennis Clay will each receive a class representative enhancement payment of \$5,000.00. (Id. ¶ 11.) This payment recognizes the individuals “for being instrumental in the early investigation and certification of the case, and for reputational damage based on their public support of the litigation.” (Suppl. Br. at 3.) Courts generally find that a \$5,000 incentive award is “presumptively reasonable.” Haralson v. U.S. Aviation Servs. Corp., 383 F. Supp. 3d 959, 975 n.11 (N.D. Cal. 2019). Accordingly, the Court concludes that this factor weighs in favor of settlement approval.

b. Stage of Proceedings and Amount of Discovery Completed

The Court next considers the stage of the proceedings and the amount of discovery completed to ensure the parties “have an adequate appreciation of the merits of the case before reaching a settlement.” Selk, 159 F. Supp. 3d at 1177. Here, though the parties did not conduct formal discovery, Defendant produced extensive pay, time, and policy records for the period of three years prior to the filing of this action. (Arbuckle Decl. ¶ 19; Suppl. Br. at 14.) Based on

this data, the parties were able to calculate exposure models and better understand the merits of their respective claims and defenses. (Arbuckle Decl. ¶¶ 19, 25.) Moreover, the parties deposed several Opt-In Plaintiffs and engaged in two mediations, one on October 7, 2020 and the other on April 15, 2021. (*Id.* ¶¶ 18, 21–22.) The second mediation resulted in a Memorandum of Understanding and the Settlement Agreement. (*Id.* ¶ 22.) Accordingly, the Court finds that the parties have sufficiently litigated this action to understand their respective positions. This factor weighs in favor of approval.

c. Seriousness of the Litigation Risks Faced by the Parties

“Courts favor settlement where ‘there is a significant risk that litigation might result in a lesser recover[y] for the class or no recovery at all.’” *Seguin*, 2018 WL 1919823, at *4 (quoting *Bellinghausen v. Tractor Supply Co.*, 306 F.R.D. 245, 255 (N.D. Cal. 2015)). Here, Plaintiffs identify the following barriers to recovery, or even prevailing at trial: (1) the lack of documentation of Plaintiffs’ off-the-clock work, (2) the possibility that any off-the-clock work would be non-compensable “gap time”, (3) the difficulties of demonstrating Defendant’s willfulness, and (4) the difficulties of class certification. (Suppl. Br. at 15.) The Court agrees that these risks are significant. Accordingly, this factor weighs in favor of settlement approval.

d. Scope of Any Release Provision in the Settlement Amount

“A[n] FLSA release should not go beyond the specific FLSA claims at issue in the lawsuit itself.” *Slezak v. City of Palo Alto*, 2017 WL 2688224, at *5 (N.D. Cal. June 22, 2017). The Court finds that this is the case here. The Agreement provides that only those Opt-In Plaintiffs who receive a settlement check will “release[] and discharge[] all claims, rights, demands, liabilities and causes of action under the federal Fair Labor Standards Act (29 U.S.C. §§ 201-219 (‘FLSA’)) brought in the Lawsuit or which could have been brought in the lawsuit during the Class Period.” (Settlement Agreement ¶ 26.) Because this release provision does not exceed the scope of FLSA claims at issue in this action, this factor weighs in favor of settlement approval.

e. Experience and View of Counsel and the Opinion of Plaintiffs

“The opinions of counsel should be given considerable weight both because of counsel’s familiarity with th[e] litigation and previous experience with cases.” *Selk*, 159 F. Supp. 3d at 1176. Plaintiffs’ counsel, Melinda Arbuckle, has extensive experience representing employees in class and collective actions in numerous cases. (Arbuckle Decl. ¶¶ 7–15.) Her firm has represented Plaintiffs since this action’s commencement. (*Id.* ¶ 16.) Ms. Arbuckle declares that the proposed Settlement Agreement “is fair and reasonable.” (*Id.* ¶ 24.) Under these facts, the Court concludes that this factor weighs in favor of approval.

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f. Possibility of Fraud or Collusion

“The likelihood of fraud or collusion is low ... [when] the Settlement was reached through arm’s-length negotiations, facilitated by an impartial mediator.” Slezak, 2017 WL 2688224, at *5. Ms. Arbuckle declares that the Settlement Agreement was reached through “extensive, arm’s length negotiations between experienced counsel.” (Arbuckle Decl. ¶ 23.) As noted above, the parties also engaged in two mediations, the latter of which resulted in the Settlement Agreement. Accordingly, the Court finds that this factor weighs in favor of approval.

In sum, because all six factors weigh in favor of settlement approval, the Court concludes that the Settlement Agreement constitutes a fair and reasonable compromise of bona fide disputes under the FLSA.

3. Attorneys’ Fees and Costs

“Where a proposed settlement of FLSA claims includes the payment of attorney’s fees, the court must also assess the reasonableness of the fee award.” Selk, 159 F. Supp. 3d at 1180 (quoting Wolinsky v. Scholastic, Inc., 900 F. Supp. 2d 332, 336 (S.D.N.Y. 2012)); *see also* 29 U.S.C. § 216(b) (finding that a court “shall ... allow a reasonable attorney’s fee to be paid by the defendant” when an employer violates certain FLSA provisions). “When a settlement produces a common fund for the benefit of the entire class, a court has the discretion to apply either the percentage-of-recovery method or the lodestar method to determine a reasonable attorney’s fee.” Dashiell v. County of Riverside, 2018 WL 3629915, at *5 (C.D. Cal. July 19, 2018) (citing Selk, 159 F. Supp. 3d at 1180). “Under the percentage-of-recovery method, the attorneys’ fees equal some percentage of the common settlement fund; in this circuit, the benchmark percentage is 25%.” In re Online DVD-Rental Antitrust Litig., 779 F.3d 934, 949 (9th Cir. 2015).

Here, Plaintiffs’ counsel seeks \$1,740,000.00 in attorneys’ fees and \$586,404.00 in costs, which represents \$573,350.00 in settlement administration costs and \$13,054.00 in other costs. (Suppl. Br. at 3–4.) The requested fee award represents a 1.76 upward multiplier of their lodestar and 40% of the total settlement amount. While an attorneys’ fee award that is 40% of the total settlement is higher than the 25% benchmark deemed reasonable by the Ninth Circuit, Selk, 159 F. Supp. 3d at 1180, the Court finds that the requested amount is reasonable under these circumstances. Plaintiffs’ counsel declares a contingency fee arrangement between Plaintiffs and Plaintiffs’ counsel calls for an attorney fee award of 40%. (Arbuckle Decl. ¶ 26.) Moreover, the Settlement Agreement also allows Plaintiffs’ counsel to recover “attorneys’ fees not in excess of forty percent (40%) of the Gross Settlement Amount, or One Million Seven Hundred Forty Thousand Dollars (\$1,740,000).” (Settlement Agreement ¶ 3.) In addition, Plaintiffs’ counsel submits sufficient documentation of their lodestar, as well as costs, and demonstrates that the work required and results achieved justify their requested multiplier. (*See* Arbuckle Fee Request Decl.) Accordingly, the Court concludes that the requested attorneys’ fees of \$1,740,000.00 and costs of \$586,404.00 are reasonable.

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B. PAGA

The Settlement Agreement provides \$500,000.00 in recovery for alleged PAGA violations for the period of February 2, 2020 through the date of the arbitration award, and requires notification to the LWDA and payment of 75% of the recovery to the LWDA. (Suppl. Br. at 20.) Plaintiffs' counsel represents that the recovery will deter future violations of PAGA based on the conduct at issue in this case. (Id.) Under these facts and in light of the above discussion, the Court finds that the Settlement provides genuine and meaningful relief, consistent with PAGA's purpose to benefit the public. Moreover, the Court finds that the Settlement Agreement is fundamentally fair, reasonable, and adequate.

In sum, the Court concludes that the Settlement Agreement meets the requirements for approval under the FLSA and PAGA. Accordingly, the Court APPROVES the Settlement Agreement. The Court GRANTS the Motion and CONFIRMS the Arbitration Award.

IV. CONCLUSION

For the reasons above, the Court GRANTS the Motion and CONFIRMS the Arbitration Award. The Court DISMISSES the case WITH PREJUDICE. Except as provided by the Arbitration Award, each side shall bear its own costs and attorneys' fees. The hearing set for July 11, 2022 is VACATED. The Clerk of the Court is directed to close the case.

IT IS SO ORDERED.

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*Counsel for Plaintiffs and Proposed
Class and Collective Action Members*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION – RIVERSIDE COUNTY**

Reginald Moore, Eduardo Guerra, and
Alisa Jones, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

Universal Protection Service, LP d/b/a
Allied Universal Security Services

Defendant.

Case No.: 5:19-cv-02124-JGB-SP

**DECLARATION OF MELINDA
ARBUCKLE IN SUPPORT OF
FEES AND COSTS**

Judge: Jesus G. Bernal

Date: n/a

Time: n/a

Courtroom: 1

DECLARATION OF MELINDA ARBUCKLE

My name is Melinda Arbuckle. Pursuant to the Court's Order of June 9, 2022 (ECF No. 259), I file the below declaration in support of the attorney's fees and costs approved by the arbitrator in this case. I am over the age of 21 and counsel of record for Plaintiffs in the above-captioned case. I am in all ways competent to make the below declaration. The sworn statements below are true and correct of my own personal knowledge:

1. "I am a partner with the law firm of Shellist Lazarz Slobin, LLP ("SLS"). I have been a licensed attorney in the state of Texas for ten years and licensed in the state of California for six years. During my career, I have specialized in labor and employment law, and especially in cases filed under the Fair Labor Standards Act.

2. I am in good standing and admitted to practice before all state and federal district courts in the states of California and Texas, as well as in the Districts of Colorado, New Mexico, North Dakota, Western District of Arkansas, Western District of Oklahoma, Northern District of Ohio, the Fifth Circuit Court of Appeals, where I have presented oral argument, and the Ninth Circuit Court of Appeals.

3. I earned my Juris Doctor from Southern Methodist University – Dedman School of Law. After graduation, I worked for Baron & Budd, P.C. ("Baron & Budd") as an associate, then completed a clerkship with Judge Royal Furgeson, who was then sitting by designation in the Northern District of Texas. Afterward, I pursued my own practice litigating debt collection and family law cases in state courts in Texas before returning to work for Baron & Budd.

4. In March of 2015, I returned to Baron & Budd to work with Allen Vaught in the firm's Labor and Employment Department. Mr. Vaught, and, by

1 proxy, the firm, had developed a significant presence in labor and employment
2 litigation – not only in the state of Texas, but nationwide.

3 5. Thereafter, in September of 2019, I joined SLS to become a part of a
4 boutique employment law firm.

5 6. I have personal knowledge of the time spent litigating this case, as I
6 was lead counsel and involved in every stage of the case. I am familiar with the
7 fees that were incurred in connection with prosecuting the case, with the hourly
8 rates charged by this and other firms for legal services similar to those rendered in
9 this case.

10 **I. PLAINTIFFS' REQUEST FOR A PERCENTAGE OF THE FUND AS**
11 **ATTORNEY'S FEES IS MERITED AND PERMISSIBLE.**

12 7. In the settlement agreement approved by the arbitrator in this case,
13 Plaintiffs sought attorney's fees as a percentage of the fund. This is common and
14 permissible in class and collective action cases. *Hanlon v. Chrysler Corp.*, 150
15 F.3d 1011, 1029 (9th Cir. 1998), *abrogated on other grounds by Wal-Mart Stores,*
16 *Inc. v. Dukes*, 564 U.S. 338 (2011). While courts may award attorneys' fees either
17 as a percentage of the fund or pursuant to the lodestar method, the arbitrator in this
18 case approved fees in the settlement agreement as a percentage of the fund. This is
19 the more common approach. *See, e.g., Blum v. Stenson*, 465 U.S. 886, 900 n.16
20 (1984); *Six (6) Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301, 1311
21 (9th Cir. 1990) (common fund fee is generally "calculated as a percentage of the
22 recovery").

23 8. Furthermore, the percentage of fund method is often the more
24 appropriate approach. *In re Activision Sec. Litig.*, 723 F. Supp. 1373, 1375-76
25 (N.D. Cal. 1989) (noting that the percentage approach aligns the incentives of the
26 class members and their counsel, so that time is spent efficiently and the class
27 recovery is maximized). Such a method also is consistent with "contingency fee

1 calculations in the private market.” *Elliott v. Rolling Frito-Lay Sales, LP*, No. 11
2 Civ. 1730, 2014 WL 2761316, at *9 (C.D. Cal. June 12, 2014).

3 9. In this Circuit, the appropriate fee percentage is based on “all of the
4 circumstances of the case.” *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1048 (9th
5 Cir. 2002) (recognizing that benchmark of 25% applies to “megafund” cases in
6 which the gross settlement amount is between \$50 million – \$200 million).
7 However, in other Circuits, a fee of 40% is the norm. *See Vela v. City of Houston*,
8 276 F.3d 659, 681 (5th Cir. 2001) (affirming district court’s finding that
9 contingency fees for class funds have ranged from thirty-five to forty percent, and
10 that thirty percent contingent fee “is on the low side” for labor litigation). *See also*,
11 *e.g.*, *Hiser v. NZone Guidance, LLC*, No. 1:18-CV-01056-RP, 2021 WL 2934896,
12 at *3 (W.D. Tex. Jan. 25, 2021) (Pitman, J.) (“The settlement agreement requires
13 that [the defendant] pay 40 percent of the total settlement amount to FLSA
14 Plaintiffs’ counsel to cover attorney’s fees and costs, in addition to ‘advanced
15 litigation expenses.’ [...] This percentage is in line with [w]hat courts have
16 approved in reviewing other FLSA settlements.”).

17 10. Here, the Court compelled several of the Plaintiffs and Opt-in
18 Plaintiffs to binding arbitration in many different states. (*See* ECF No. 106.)
19 Indeed, in its Order reserving ruling on Plaintiffs’ Motion to Lift Stay and Confirm
20 Award after the arbitrator approved the settlement agreement (ECF No. 250), the
21 Court cites to many different federal district courts in support of its holding that it
22 may not “rubber stamp” the arbitration award. (*See, id.* citing cases from Southern
23 District of Texas, Southern District of New York, and Northern District of
24 Florida). So, it is not clear what law should apply with respect to the benchmark. In
25 any event, as shown below, a crosscheck of Plaintiffs’ counsel’s lodestar more than
26 justifies the approved 40% award.

1 11. Still, even in this Circuit, especially in cases below the “megafund”
2 range, “in most common fund cases, the award [typically] exceeds [the 25%]
3 benchmark.” *In re Omnivision Techs., Inc.*, 559 F. Supp. 2d 1036, 1047 (N.D. Cal.
4 2008); *see also Bennett v. SimplexGrinnell LP*, No. 11-cv-01854-JST, 2015 WL
5 12932332, at *6 (N.D. Cal. Sept. 3, 2015) (38.8% of a \$4.9 million common fund);
6 *Smith v. CRST Van Expedited, Inc.*, No. 10 Civ. 1116, 2013 WL 163293, at *5
7 (S.D. Cal. Jan. 14, 2013) (33 1/3 % fee, and citing wage and hour class actions
8 awarding fees of 40% of a common fund); *Craft v. Cty of San Bernardino*, 624 F.
9 Supp. 2d 1113, 1125 (C.D. Cal. 2008) (surveying cases and noting that “25% is
10 substantially below the average class fund fee nationally”).

11 12. The fee approved by the arbitrator is in line with fees awarded in this
12 Circuit, and others, for settlements of this size under both the percentage and
13 lodestar methods. *See Burden v. SelectQuote Ins. Servs.*, No. 10-cv-5966-LB, 2013
14 WL 3988771, at *5 (N.D. Cal. Aug. 2, 2013) (33 1/3%, .95x multiplier to lodestar
15 on crosscheck); *Vedachalam v. Tata Consultancy Servs., Ltd.*, No. 06-cv-963-CW,
16 2013 WL 3941319, at *2-3 (N.D. Cal. July 18, 2013) (30%, 1.85x multiplier to
17 lodestar on crosscheck); *Rivas v. BG Retail, LLC*, No. 16-cv-06458-BLF, 2020 WL
18 264401, at *8 (N.D. Cal. Jan. 16, 2020) (40%, .49x multiplier on lodestar
19 crosscheck); *Birch v. Office Depot, Inc.*, Case No. 06cv1690 (S.D. Cal. Sept. 28,
20 2007) (awarding a 40% fee on a \$16 million wage and hour class action); *Rippee v.*
21 *Boston Market Corp.*, Nos. 05 Civ. 1359, 05 Civ. 1360, 2006 WL 8455400, at *4
22 (S.D. Cal. Oct. 10, 2006) (approving 40% fee and 3.2x multiplier to lodestar in
23 light of favorable result, counsel’s skill and considerable risk undertaken). *Accord,*
24 **Exhibit E**, *Brewster v. All American Oilfield, LLC*, No. 3:21-cv-00007-JMK (D.
25 Alaska May 13, 2022) (40%, 2.43x multiplier to lodestar).

13. To the extent this Court wishes to conduct a lodestar crosscheck, Plaintiffs' counsel has attached the firm's lodestar, and discusses the significant time and monetary investments that counsel have made in this case which more than adequately justify the fee awarded by the arbitrator.

II. LODESTAR

14. Attached hereto as **Exhibit A** is a true and accurate summary of the hours, billing rate, and total fee for each timekeeper's work in this case up until April 2021. The lodestar entries are the contemporaneously-kept billing records of each timekeeper represented therein, rounded to the nearest one-tenth of an hour.

15. Plaintiffs' counsel have expended significant time in this case, with work still continuing and expected to continue through 2022.

16. In 2019, Plaintiffs' counsel billed a total of 155.2 hours in 260 billable events, leading to **\$92,572.00** in fees in that year.

17. In 2020, Plaintiffs' counsel billed a total of 1437 hours in 2,039 billable events, incurring **\$869,376.50** in fees in that year. Counsel engaged in formal written and oral discovery and one failed mediation before Lynn Cohn. Considering fees in 2019 and 2020 alone, the Court would only have to apply a modest 1.9x multiplier to justify the 40% requested in this case.

18. However, this case was also aggressively litigated through 2021, with more depositions and formal discovery completed, until it finally resolved at a second, successful mediation before Charles Stohler on April 15, 2021. In those four months, Plaintiffs' counsel billed an additional \$118,898.50, making the total lodestar submitted in this case **\$988,275.00**.

19. Even still, the Parties continued to negotiate the proper terms of the settlement agreement, and the case required additional work with experts to ensure

1 that notice to all of the Opt-in Plaintiffs bound by the settlement agreement would
2 be properly effected.

3 20. This case was made particularly difficult by its nature as an “off-the-
4 clock” case, and because of the variety of policies that applied to the Opt-in
5 Plaintiffs to the extent they worked for a company to which Defendant was a
6 successor in interest. While Defendant has a unified policy, much of the liability in
7 this case arises from the fact that Defendant’s business model is to acquire its
8 competitors, and consequently it inherits those companies’ violative pay practices.
9 Because the pay policies and/or practices would vary from acquired company to
10 acquired company, the case was at risk of decertification, even if there were not
11 binding, individual arbitration agreements applicable to the majority of the Opt-in
12 Plaintiffs.

13 21. The case was further complicated and more time-consuming than the
14 average FLSA collective action due to two particular issues discussed in further
15 detail below.

16 **1. Time Spent Intervening in and Objecting to the *Hakeem***
17 **Lawsuit in Superior Court for the County of Sacramento.**

18 22. Defendant’s counsel first alerted Plaintiffs to the existence of the
19 *Hakeem* lawsuit and settlement in the Superior Court for the County of Sacramento
20 before Plaintiffs had even effected service of the above-captioned case on
21 Defendant.

22 23. Defense counsel repeatedly and aggressively contended that the
23 settlement in the *Hakeem* lawsuit would erase liability for the majority of the
24 individuals who opted in to the above-captioned case who worked in California.
25 Plaintiffs’ counsel met that aggressive stance offensively by seeking leave to
26 intervene in *Hakeem*. Unusually in cases of this sort, and through Plaintiffs’
27 counsel’s great effort, Plaintiffs were successful in intervening in *Hakeem*.

1 24. It was only by intervening in the action and objecting to the settlement
2 that Plaintiffs' counsel were able to secure an admission in open court that the
3 *Hakeem* lawsuit did not release the FLSA claims of individuals who would opt in
4 to the *Moore* action and would not prohibit them from seeking a recovery in this
5 case.

6 25. Most critically, the settlement agreement resolves Plaintiffs' claims in
7 the above-captioned case and/or their individual arbitrations against Defendant, but
8 also resolves their interests as Plaintiff-Intervenors in the *Hakeem* lawsuit.
9 Consequently, it is entirely proper that Plaintiffs' counsel submitted billing records
10 with respect to time spent litigating the *Hakeem* matter, which was substantial.

11 **2. Sending Notice to Approximately 500,000 Individuals, and**
12 **Responding to Thousands of Calls, Emails and Other**
13 **Requests from the Class.**

14 26. Sending notice to the approximately 500,000 class members in this
15 case was first of all an expensive proposition. Plaintiffs' counsel approached three
16 respected claims administrators to solicit competitive bids, and landed on the most
17 competitive bid, which was from Phoenix Settlement Administrators, at \$465,000.

18 27. In an attempt to minimize the risk of loss from the cost of the notice
19 process, Counsel elected not to engage Phoenix's call center in the hopes that (1)
20 clients would receive higher quality support from legal assistants at the firms of
21 SLS and FH, and (2) in the event of a total loss, Plaintiffs would not be responsible
22 for the additional cost. Phoenix originally quoted a cost of \$11,000.00.

23 28. However, there were significant issues with the notice administration
24 process. First, Defendant had initially assigned all of the class members a unique
25 identification number. This was critical because many of the class members had
26 similar names. When Phoenix issued notice, it abandoned the Defendant's unique
27 identification numbers and generated its own identification numbers for the class
28

1 members, the PSA ID Numbers. So, when the time came for Defendant to
2 determine who had opted-in to the lawsuit, Counsel for Plaintiff had to run
3 comparisons in Excel and SQL to mate the PSA ID Numbers with the Defendant's
4 identification numbers.

5 29. Worse still, some of the notices issued to the class members did not
6 contain the PSA ID Number applicable to the class member. Many class members
7 joined the case through the online portal by making up a PSA ID Number, which
8 made it impossible for certain individuals to sign up with their unique PSA ID
9 Number. Counsel's office was flooded with hundreds of calls from individuals
10 seeking their respective PSA ID Numbers or complaining that the online portal
11 would not work for them. There were also many calls regarding the class members
12 individual and privileged concerns with their employment with Allied.

13 30. Once the issue was spotted, it was incredibly difficult to correct.
14 Phoenix, for its part, developed a utility so that the class members could look up
15 their PSA ID Number. However, when approached about providing call center
16 services, in light of the glut of calls, Phoenix would not honor its original quote of
17 \$11,000. Plaintiffs' counsel solicited quotes from other call centers, but most were
18 in the range of \$50,000 to \$100,000, which increased the risk of loss. So Plaintiffs'
19 counsel elected to continue with its own staff answering upward of one hundred
20 calls and emails per day.

21 31. Many class members also opted into the lawsuit repetitively, by mail,
22 email, and through the online portal. I personally ended up engaging the services of
23 a software developer to assist in resolving the issue of Opt-in Plaintiffs whose
24 names did not match their PSA ID Number and removing the duplicate names. I
25 paid that software developer \$8,000, which cost I did not seek in connection with
26 the fees and costs awarded by the arbitrator.

1 32. In short, the risk of loss in this case was extremely high. Plaintiffs'
2 counsel spent greater than average time and money in litigating the case, and are
3 entitled to the fee that the arbitrator approved.

4 **3. Billing Judgment.**

5 33. Counsel used billing judgment when generating the lodestar attached
6 to this declaration.

7 34. First, Plaintiffs' counsel has not submitted lodestar for the substantial
8 time spent negotiating the settlement agreement, briefing the motion for approval
9 before the arbitrator, ensuring the accuracy of the list of the Opt-in Plaintiffs or
10 reviewing lodestar for privileged information even though such time is billable.
11 Plaintiffs' counsel estimates that at least 200 hours of attorney time¹ was billed
12 after the Parties reached the MOU in this case (a minimum of \$145,000 written
13 off).

14 35. Second, Plaintiffs' counsel also did not bill for any client contact
15 through the alliedinfo@eeoc.net email address or the hotline after September of
16 2020 (a total of 2,577 emails and voicemails), even though staff and counsel
17 continued to monitor and respond to those client inquiries through the duration of
18 the case. Assuming that each of those emails and voicemails resulted in a
19 minimum billing event of one-tenth of an hour billed at the lowest hourly rate,
20 Plaintiffs' counsel have written off \$61,848.00, and in reality have written off
21 something closer to \$309,240.00.

22 36. Furthermore, Plaintiffs' counsel will continue to incur fees during the
23 administration of the settlement to the Plaintiffs and Opt-in Plaintiffs. In my
24 experience, administering class settlements of this nature and size requires a
25

26 ¹ This estimate is based on a minimum billing of .1 for approximately 2000 emails in the
27 undersigned's inbox relative to this case after the MOU was fully executed on April 20, 2021.

1 substantial and ongoing commitment, long after the Court confirms the arbitrator's
2 award. Plaintiffs' counsel anticipates expending many hours over the next several
3 months conferring with the settlement administrator and responding to inquiries
4 from Plaintiffs and the Opt-in Plaintiffs as well as from opposing counsel.
5 Plaintiffs' counsel estimates that at least another 40 hours of attorney time, and 150
6 hours of legal assistant time will be spent in the process (a minimum of \$65,000
7 written off).

8 37. All told, in the exercise of billing judgment, Plaintiffs' counsel have
9 written off approximately \$519,240.00, which is not included in the lodestar
10 submitted to the Court. If added to the lodestar, Plaintiffs' counsel would have
11 billed approximately **\$1,507,515.00**, which absolutely justifies the fee approved by
12 the arbitrator.

13 **III. EXPERIENCE OF COUNSEL, APPLICABLE BILLING RATES**

14 **1. My Background and Experience**

15 38. As stated above, I have many years of experience in prosecuting
16 complex federal claims for unpaid wages representing workers in class action
17 settings. Below are examples of reported cases in which I served as class counsel:

- 18 a. *Gentry v. Hamilton-Ryker IT Sols., LLC*, No. 3:19-cv-00320,
19 2022 WL 889276 (Mar. 25, 2022) (granting summary judgment
20 and ordering payment of back overtime pay to two engineers
21 paid on a day rate basis);
- 22 b. *Byrne v. Santa Barbara Hosp. Servs., Inc.*, No. EDCV 17-527
23 JGB (KKx), 2017 WL 5035366, at *7 (C.D. Cal. Oct. 30, 2017)
24 (granting preliminary approval to class action settlement
25 totaling to \$8,500,000);
26
27

- c. *Williams v. Go Frac, LLC*, No. 2:15-cv-00199-JRG, 2017 WL 3699350, at *2-3 (E.D. Tex. Apr. 26, 2017) (granting final approval of class action settlement totaling to \$5,700,000);
- d. *Olibas v. Barclay*, 838 F.3d 442 (5th Cir. 2016) (upholding jury verdict on behalf of class of 110 truck drivers and affirming district court's entry of judgment totaling to \$3,728,613.91 inclusive of attorneys' fees); and
- e. *Argo v. Precision Drilling Co., LP*, No. 4:15-CV-00604, 2015 WL 9319233 (S.D. Tex. Dec. 23, 2015) (granting conditional certification of nationwide class of approximately 19,000 hourly paid drilling rig crew workers).

39. I have also served as trial counsel in two cases in which plaintiffs successfully established liability against their former employers for back wages under the FLSA:

- a. *Cruz v. Maverick Cty*, No. DR-14-CV-050-AM, 2018 WL 8897808 (W.D. Tex. Mar. 20, 2018) (adjudging damages in the amount of \$569,669.58 to a group of sheriff deputies who performed services off-the-clock); and
- b. *Meadows v. Latshaw Drilling Co., LLC*, No. 3:15-cv-1173-N, 2019 WL 7765932 (N.D. Tex. Apr. 11, 2019) (finding liability for a collective of oilfield workers due to the defendant's failure to include all remuneration, including bonuses and oil-based mud pay, in the workers' respective regular rates of pay).

40. I have also served as lead counsel on hundreds of wage and hour and other employment law related cases which settled confidentially.

1 41. I have been selected as a *Thomson Reuters* “Rising Star” in every year
2 since 2018.

3 **2. Attorneys and Staff at SLS**

4 42. SLS has significant experience in complex class and collective action
5 wage cases nationwide. SLS is composed of seasoned wage and hour attorneys
6 with years of experience litigating FLSA and similar state law counterpart lawsuits
7 filed throughout the nation, at the state, federal and at the appellate level. Indeed,
8 we have been approved by courts throughout the country to act as class counsel in
9 numerous other collective and class actions.

10 43. Specifically, Todd Slobin is a board-certified labor and employment
11 attorney with over twenty-three years of experience. A copy of his profile is
12 attached to this declaration as **Exhibit B**. Ricardo Prieto is also a board-certified
13 labor and employment practitioner with over fourteen years of experience. A copy
14 of his resume is attached to this declaration as **Exhibit C**. Currently, SLS’s
15 attorney rate range from \$500 to \$1,100 per partner’s hour and \$270 to \$475 per
16 associate’s hour.

17 44. The primary paralegal staffed on this case, Susan Cavanaugh, has 32
18 years of experience in the legal field. Currently, SLS’s rates range from \$200 to
19 \$275 per paralegal’s hour.

20 **3. Attorneys and Staff at FH**

21 45. Forester Haynie, PLLC, also has significant experience in complex
22 class and collective action cases. Specifically, partner-level attorneys Jay Forester
23 and Matthew Haynie have years of experience in prosecuting high level mass tort
24 and wage and hour cases. A copy of their profiles are attached to this declaration as
25 **Exhibit D**.

4. Applicable Billing Rates

46. Plaintiffs' counsel have billed their time at the following rates: (1) Senior Counsel, with over 20 years of experience, bill at the rate of \$950/hour; (2) Class Counsel, partner level attorneys with over 5 years of experience, bill at the rate of \$725/hour; (3) other attorneys bill at the rate of \$450/hour; (4) legal assistants bill at the rate of \$240/hour.

47. I have personal knowledge of the hourly rates charged by other attorneys with comparable experience, as well as the attorneys who worked on this matter. Based on that information, I believe that these rates are fully consistent with, if not lower than, the market rate in the Central District of California for attorneys with comparable expertise, experience and qualifications, and that they are comparable to rates of attorneys specializing in complex litigation around the country. Based on the information I have, I believe that the rates charged are reasonable and appropriate for partner and non-partner attorney time compared with attorneys with similar expertise, experience, and qualifications.

48. For instance, in *Lillehagen v. Alorica, Inc.*, No. 8:13-cv-00092-DOC(JPRx) (C.D. Cal. Dec. 5, 2016) (Dkt. No. 276), Judge David O. Carter granted final approval to a Rule 23 wage and hour settlement, approving of attorneys billing at similar rates over five years ago. *See Exhibit F.*

IV. LODESTAR CROSS CHECK

49. The following factors are relevant to whether a fee award is reasonable:

(1) the results achieved; (2) the risk of litigation; (3) the skill required and the quality of work; (4) the contingent nature of the fee and financial burden carried by the plaintiffs; and (5) awards made in similar cases.

Vizcaino, 290 F.3d 1043, 1048-50 (9th Cir. 2002).

1 50. Plaintiffs' counsel have submitted lodestar totaling to **\$988,275.00**
2 and the arbitrator approved a modest multiplier of approximately 1.76x. This is
3 appropriate given the *Vizcaino* factors.

4 51. First, Plaintiffs' counsel obtained a great result due to their tenacity
5 and risk tolerance. Plaintiffs' counsel was able to certify a collective action of
6 approximately 500,000 people notwithstanding the presence of enforceable
7 arbitration agreements as to the named Plaintiffs. Plaintiffs' counsel was able to
8 bring a reluctant Defendant to the negotiating table by leveraging discovery,
9 participating in parallel litigation, and by the persistence of the Plaintiffs' claims.
10 And Plaintiffs' counsel did attempt to speed the process of getting settlement
11 checks into the Opt-in Plaintiffs' hands by submitting the settlement agreement to
12 an arbitrator, which was appropriate in light of the Court's order granting
13 Defendant's motion to compel arbitration and the applicable arbitration agreements
14 as to the majority of the Opt-in Plaintiffs. The significant relief that the Plaintiffs
15 and Opt-in Plaintiffs will receive is also apparent given the fact that the average
16 Opt-in Plaintiff would have had to have worked 6.4 hours off-the-clock each and
17 every week before they would have been due any money by the Defendant.

18 52. As discussed above, the sheer number of class members, the
19 competing litigation, the presence of arbitration agreements, and the nature of off-
20 the-clock claims make this case one of the more difficult FLSA cases that can be
21 brought. Consequently, the skill required to prosecute this case was greater than
22 average.

23 53. The risk was also heightened in this case given the amount of money
24 and time expended in this case exceeds that of any other case I have prosecuted.

25 54. Plaintiffs' counsel accepted this case on a contingency fee basis, and
26 the significant time commitment required both SLS and FH to forego other
27
28

1 financial opportunities in order to properly litigate the case. Furthermore, Plaintiffs
2 approached our law firms and agreed to pay fees of the greater of 40% or our total
3 lodestar, and the Opt-in Plaintiffs have agreed to be bound by that agreement, so
4 there is no unfairness to the 40% fee award approved by the arbitrator.
5 Furthermore, Plaintiffs' counsel carried a large financial burden with respect to the
6 costs in this case, and should receive the benefit of their financial investment in the
7 claims of the Opt-in Plaintiffs.

8 55. The modest multiplier to the lodestar submitted (representing only
9 approximately two years of work in this case which has pended since 2019) is
10 appropriate given the difficulty of the case, the contingent nature of the fee, the
11 significant costs borne by Plaintiffs, and, most critically, it is within the range of
12 precedent. *See Vizcaino*, 290 F.3d at 1051, n.6 (finding that 83 percent of approved
13 class action settlements had fee multipliers between 1.5 and 4); *Steiner v. Am.*
14 *Broadcasting Co., Inc.*, 248 Fed. App'x 780, 783 (9th Cir. 2007) (finding that a
15 multiplier of 6.85x falls within the acceptable range).

16 **V. COSTS**

17 56. To date, Plaintiffs' counsel has incurred \$496,231.73 in litigation
18 costs and expenses. Attached hereto as **Exhibit G** are records of the litigation costs
19 in this case. The greatest expense was notice by Phoenix Settlement Administrators
20 to the approximately 500,000 class members during the notice period in the second
21 half of 2020, which totaled to \$465,000. To date, no Plaintiff has objected to the
22 requested reimbursement for costs. Each and every cost incurred in this case was
23 reasonable and necessary for the effective prosecution of the case.

24 57. Critically, reimbursement of the class notice cost is particularly
25 appropriate because (1) the cost was Court ordered; (2) Plaintiffs' counsel
26 conferred with counsel for Defendant before incurring the cost, and inquired if
27

1 Defendant would prefer to discuss class settlement before issuing notice to provide
2 for only one notice period; and (3) the expense is recoverable. *See, e.g., Selk v.*
3 *Pioneers Mem'l Healthcare Dist.*, 159 F. Supp. 3d 1164, 1182 (S.D. Cal. 2016)
4 (reimbursing filing fees, deposition costs, third party administration fees, and
5 expert fees).

6 58. I declare under penalty of perjury under the laws of the United States
7 that the foregoing is true and correct.”
8

9 EXECUTED on JUNE 29, 2022 in the City of DALLAS in the State of TEXAS.

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11 s/Melinda Arbuckle
Melinda Arbuckle
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EXHIBIT A

2019 Billing Summary **\$92,572.00**

September 2019	
Timekeeper	Total Amount Billed
Ciara Stephenson (CS)	\$24.00
Danielle Hopkins (DH)	\$168.00
David Matthew Haynie (DMH)	\$3,842.50
Gabriella Stringer (GS)	\$24.00
Jesse "Jay" Forester (JF)	\$507.50
Melinda Arbuckle (MA)	\$7,685.00
Meredith Mathews Black (MMB)	\$720.00
Matthew Van Fleet (MVF)	\$48.00
Ricardo Prieto (RP)	\$2,175.00
Trena Mack (TM)	\$576.00
Todd Slobin (TS)	\$190.00
	\$15,960.00

October 2019	
Timekeeper	Total Amount Billed
Colin Elliott (CE)	\$168.00
David Matthew Haynie (DMH)	\$2,465.00
Melinda Arbuckle (MA)	\$9,352.50
Ricardo Prieto (RP)	\$2,030.00
Susan Cavanaugh (SC)	\$168.00
Trena Mack (TM)	\$2,544.00
	\$16,727.50

November 2019	
Timekeeper	Total Amount Billed
Colin Elliott (CE)	\$96.00
Danielle Hopkins (DH)	\$48.00
David Matthew Haynie (DMH)	\$2,102.50
Glenn Danas (GD)	\$580.00
Kristin Broderick (KB)	\$216.00
Melinda Arbuckle (MA)	\$21,097.50

Ricardo Prieto (RP)	\$6,235.00
Susan Cavanaugh (SC)	\$3,768.00
Trena Mack (TM)	\$744.00
Todd Slobin (TS)	\$3,040.00
	\$37,927.00

December 2019

Timekeeper	Total Amount Billed
David Matthew Haynie (DMH)	\$362.50
Melinda Arbuckle (MA)	\$19,430.00
Ricardo Prieto (RP)	\$725.00
Susan Cavanaugh (SC)	\$336.00
Trena Mack (TM)	\$1,104.00
	\$21,957.50

September 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/12/2019	TM	LA	0.7	\$240.00	\$168.00	Initial Conference with Alisa Jones
9/12/2019	TM	LA	0.2	\$240.00	\$48.00	Prepare contract
9/12/2019	TM	LA	0.5	\$240.00	\$120.00	Correspondence to obtain relevant documents
9/17/2019	DMH	CC	0.5	\$725.00	\$362.50	Email to MA re potential new case against Allied
9/17/2019	MA	CC	0.2	\$725.00	\$145.00	Review em from DMH re potential new case against Allied
9/17/2019	JF	CC	0.2	\$725.00	\$145.00	Review em from DMH re potential new case against Allied
9/17/2019	MA	CC	0.1	\$725.00	\$72.50	Forward em to RP for review
9/17/2019	RP	CC	0.2	\$725.00	\$145.00	Review and respond to em re potential new case against Allied
9/17/2019	MA	CC	0.1	\$725.00	\$72.50	Review and respond to em from RP re potential new case
9/17/2019	RP	CC	0.1	\$725.00	\$72.50	Review and respond to em from MA re potential new case
9/17/2019	MA	CC	0.5	\$725.00	\$362.50	Brief call re legal issues to vet with client
9/17/2019	RP	CC	0.5	\$725.00	\$362.50	Brief call re legal issues to vet with client
9/17/2019	DMH	CC	0.2	\$725.00	\$145.00	Review case file
9/17/2019	DMH	CC	0.1	\$725.00	\$72.50	Respond to MA question re documents
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Email to DMH re set up client call next week
9/18/2019	DMH	CC	0.2	\$725.00	\$145.00	Email MA re fee split
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Email to RP re fee split
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Email to DH re case initiation
9/18/2019	DH	LA	0.2	\$240.00	\$48.00	Set up case file
9/18/2019	DH	LA	0.1	\$240.00	\$24.00	Email MA re case initiation
9/18/2019	MA	CC	0.2	\$725.00	\$145.00	Email RP re case set up procedure
9/18/2019	RP	CC	0.1	\$725.00	\$72.50	Respond to MA email
9/18/2019	MA	CC	0.5	\$725.00	\$362.50	Brief call re case set up procedure
9/18/2019	RP	CC	0.5	\$725.00	\$362.50	Brief call re case set up procedure
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Email DMH re defendant name for conflict check
9/18/2019	DMH	CC	0.1	\$725.00	\$72.50	Review and respond to email from MA re defendant name for conflict check
9/18/2019	RP	CC	0.1	\$725.00	\$72.50	Respond to email from MA re fee split
9/18/2019	MA	CC	0.2	\$725.00	\$145.00	Review and respond to email from RP re fee split
9/18/2019	MA	CC	0.5	\$725.00	\$362.50	Corporate research
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Email DMH re corporate research
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Respond to email from RP re questions regarding division of labor and fee split
9/18/2019	DMH	CC	0.3	\$725.00	\$217.50	Review file
9/18/2019	DMH	CC	0.1	\$725.00	\$72.50	Respond to email from MA re corporate research
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from DMH

EXHIBIT 9

September 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/18/2019	DMH	CC	0.1	\$725.00	\$72.50	Review and respond to email from MA scheduling client call
9/18/2019	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from DMH scheduling client call
9/18/2019	DMH	CC	0.1	\$725.00	\$72.50	Final email scheduling client call
9/19/2019	MA	CC	0.1	\$725.00	\$72.50	Email DVH to confirm call
9/19/2019	DMH	CC	0.1	\$725.00	\$72.50	Respond to MA email
9/19/2019	MVF	LA	0.1	\$240.00	\$24.00	Review DMH email
9/19/2019	MA	CC	0.1	\$725.00	\$72.50	Respond to DMH email
9/19/2019	DMH	CC	0.1	\$725.00	\$72.50	Review MA email
9/19/2019	MVF	LA	0.1	\$240.00	\$24.00	Review MA email
9/20/2019	RP	CC	0.3	\$725.00	\$217.50	Internal email re Allied case
9/20/2019	DH	LA	0.1	\$240.00	\$24.00	Review RP internal email re Allied case
9/20/2019	TS	SC	0.1	\$950.00	\$95.00	Review RP internal email re Allied case
9/20/2019	MA	CC	0.1	\$725.00	\$72.50	Review RP internal email re Allied case
9/20/2019	RP	CC	0.1	\$725.00	\$72.50	Review response to internal email re Allied case
9/20/2019	DH	LA	0.1	\$240.00	\$24.00	Review response to internal email re Allied case
9/20/2019	TS	SC	0.1	\$950.00	\$95.00	Review response to internal email re Allied case
9/20/2019	MA	CC	0.1	\$725.00	\$72.50	Review response to internal email re Allied case
9/23/2019	DMH	CC	0.5	\$725.00	\$362.50	Brief conference re Allied case
9/23/2019	MMB	AT	0.5	\$450.00	\$225.00	Brief conference re Allied case
9/23/2019	DMH	CC	0.1	\$725.00	\$72.50	Email MA re upcoming call, join MMB
9/23/2019	MA	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
9/23/2019	DMH	CC	0.1	\$725.00	\$72.50	Review and respond to MA email
9/23/2019	DH	LA	0.1	\$240.00	\$24.00	Follow up with MA re contact information, internal set up
9/23/2019	RP	CC	0.1	\$725.00	\$72.50	Review DH email
9/23/2019	MA	CC	0.1	\$725.00	\$72.50	Review and respond to DH email
9/23/2019	GS	LA	0.1	\$240.00	\$24.00	Review DH email
9/23/2019	CS	LA	0.1	\$240.00	\$24.00	Review DH email
9/23/2019	DH	LA	0.1	\$240.00	\$24.00	Respond to MA email
9/23/2019	DMH	CC	0.1	\$725.00	\$72.50	Email MA regarding upcoming call
9/23/2019	MA	CC	0.1	\$725.00	\$72.50	Respond to DMH email
9/23/2019	DMH	CC	0.1	\$725.00	\$72.50	Respond to MA email
9/23/2019	DMH	CC	0.9	\$725.00	\$652.50	Prep and attend early case strategy conference
9/23/2019	MA	CC	0.9	\$725.00	\$652.50	Prep and attend early case strategy conference
9/23/2019	MMB	AT	0.9	\$450.00	\$405.00	Prep and attend early case strategy conference

EXHIBIT 9

September 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/24/2019	MA	CC	3.4	\$725.00	\$2,465.00	Draft co-counsel agreement for RP review
9/24/2019	RP	CC	0.6	\$725.00	\$435.00	Review and redline co-counsel agreement
9/24/2019	MA	CC	2.1	\$725.00	\$1,522.50	Review and incorporate RP redlines, finalize co-counsel agreement
9/24/2019	DMH	CC	0.8	\$725.00	\$580.00	Review co-counsel agreement
9/26/2019	DMH	CC	0.5	\$725.00	\$362.50	Discuss fee split
9/26/2019	JF	CC	0.5	\$725.00	\$362.50	Discuss client privileged information
9/26/2019	DMH	CC	0.2	\$725.00	\$145.00	Draft email to MA and RP re fee split, marketing
9/26/2019	RP	CC	0.1	\$725.00	\$72.50	Review DMH email
9/26/2019	MA	CC	0.1	\$725.00	\$72.50	Review DMH email
9/26/2019	MMB	AT	0.1	\$450.00	\$45.00	Review DMH email
9/26/2019	RP	CC	0.2	\$725.00	\$145.00	Discuss DMH proposals
9/26/2019	MA	CC	0.2	\$725.00	\$145.00	Discuss DMH proposals
9/26/2019	MA	CC	0.1	\$725.00	\$72.50	Draft email to DMH re fee split, marketing
9/26/2019	RP	CC	0.1	\$725.00	\$72.50	Review email from MA
9/26/2019	DMH	CC	0.1	\$725.00	\$72.50	Review email from MA
9/26/2019	MMB	AT	0.1	\$450.00	\$45.00	Review email from MA
9/28/2019	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Reginald Moore
9/30/2019	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Austin Salle
\$15,960.00						

October 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
10/01/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Nancy Sindar
10/01/19	RP	CC	0.5	\$725.00	\$362.50	Discuss Allied case with marketing company
10/02/19	RP	CC	0.2	\$725.00	\$145.00	Review email from marketing company
10/02/19	RP	CC	0.1	\$725.00	\$72.50	Forward email from marketing company to MA
10/02/19	MA	CC	0.2	\$725.00	\$145.00	Review and respond to email from RP
10/03/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Milagros Almonte
10/07/19	RP	CC	0.1	\$725.00	\$72.50	Further emails with marketing company
10/07/19	RP	CC	0.1	\$725.00	\$72.50	Forward emails to MA
10/07/19	MA	CC	0.1	\$725.00	\$72.50	Review and respond to emails
10/08/19	MA	CC	1	\$725.00	\$725.00	Case strategy conf
10/08/19	DMH	CC	1	\$725.00	\$725.00	Case strategy conf
10/08/19	MA	CC	0.5	\$725.00	\$362.50	Revise co-counsel agreement, email to DMH
10/08/19	DMH	CC	1.2	\$725.00	\$870.00	Review co-counsel agreement
10/08/19	RP	CC	0.1	\$725.00	\$72.50	Review email attaching co-counsel agreement
10/08/19	DMH	CC	0.1	\$725.00	\$72.50	Execute co-counsel agreement, send to MA, RP
10/08/19	MA	CC	0.1	\$725.00	\$72.50	Review signed co-counsel agreement, forward to RP for signature
10/08/19	RP	CC	0.1	\$725.00	\$72.50	Execute co-counsel agreement, send to MA, DMH
10/08/19	RP	CC	0.2	\$725.00	\$145.00	Various emails regarding execution of co-counsel agreement
10/08/19	MA	CC	0.2	\$725.00	\$145.00	Various emails regarding execution of co-counsel agreement
10/08/19	DMH	CC	0.1	\$725.00	\$72.50	Confirm receipt of co-counsel agreement
10/08/19	RP	CC	0.1	\$725.00	\$72.50	Email questions re identity of plaintiffs
10/08/19	DMH	CC	0.1	\$725.00	\$72.50	Respond to RP email
10/08/19	RP	CC	0.1	\$725.00	\$72.50	Respond to DMH email
10/08/19	MA	CC	0.1	\$725.00	\$72.50	Review various emails between RP and DMH
10/09/19	DMH	CC	0.3	\$725.00	\$217.50	Review case file, email information to co-counsel
10/09/19	MA	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
10/09/19	RP	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
10/09/19	DMH	CC	0.1	\$725.00	\$72.50	Respond to MA and RP email
10/09/19	MA	CC	0.1	\$725.00	\$72.50	Respond to DMH email
10/09/19	RP	CC	0.5	\$725.00	\$362.50	Confer re venue
10/09/19	MA	CC	0.5	\$725.00	\$362.50	Confer re venue
10/09/19	RP	CC	0.1	\$725.00	\$72.50	Email instructions to staff
10/09/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email

EXHIBIT 9

October 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
10/09/19	CE	LA	0.5	\$240.00	\$120.00	Review email from RP with instructions, initiate case file
10/09/19	MA	CC	1.9	\$725.00	\$1,377.50	Begin work on Original Complaint
10/09/19	RP	CC	0.1	\$725.00	\$72.50	Email to DMH re: gather paystubs from clients
10/09/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email
10/09/19	DMH	CC	0.1	\$725.00	\$72.50	Instructions to staff to gather paystubs
10/09/19	TM	LA	0.1	\$240.00	\$24.00	Review email from DMH re gather paystubs
10/09/19	TM	LA	1.5	\$240.00	\$360.00	Work on gathering paystubs from existing clients
10/09/19	MA	CC	0.1	\$725.00	\$72.50	Various emails with DMH re gathering missing information
10/09/19	DMH	CC	0.1	\$725.00	\$72.50	Respond to MA email
10/09/19	MA	CC	0.1	\$725.00	\$72.50	Request missing information from TM
10/09/19	TM	LA	0.4	\$240.00	\$96.00	Gather missing information and respond to MA
10/09/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Robert Snyder
10/09/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Esther Shipley
10/09/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Damaura Christian
10/09/19	TM	LA	0.2	\$240.00	\$48.00	Work with Alisa Jones to execute disclosure
10/10/19	CE	LA	0.1	\$240.00	\$24.00	Internal email re case initiation
10/10/19	RP	CC	0.1	\$725.00	\$72.50	Email staff re case initiation
10/10/19	SC	LA	0.1	\$240.00	\$24.00	Review and respond to RP email
10/10/19	CE	LA	0.1	\$240.00	\$24.00	Review and respond to RP email
10/11/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Crystal Brandy
10/11/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Denise Aquino
10/11/19	MA	CC	0.1	\$725.00	\$72.50	Request DMH add SC to dropbox
10/11/19	DMH	CC	0.2	\$725.00	\$145.00	Change and respond to email from MA re add SC to dropbox
10/11/19	MA	CC	0.1	\$725.00	\$72.50	Email SC re access to dropbox
10/11/19	SC	LA	0.1	\$240.00	\$24.00	Confirm access to dropbox
10/11/10	MA	CC	4.1	\$725.00	\$2,972.50	Continue work on Original Complaint
10/14/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Eduardo Guerra
10/15/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - King Bandoh
10/15/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Tonya Brown
10/15/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Crystal Guzman
10/15/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Tyler Sout
10/23/19	MA	CC	0.1	\$725.00	\$72.50	Follow up with TM re paystubs
10/23/19	TM	LA	0.5	\$240.00	\$120.00	Update file, respond to MA email

EXHIBIT 9

October 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
10/24/19	TM	LA	1.9	\$240.00	\$456.00	Gather additional documents, update spreadsheet, email MA
10/24/19	MA	CC	0.1	\$725.00	\$72.50	Review TM email
10/24/19	MA	CC	2.4	\$725.00	\$1,740.00	Review additional client materials, continue work on Original Complaint
10/25/19	DMH	CC	0.1	\$725.00	\$72.50	Email MA re need anything additional for pre-litigation
10/25/19	MA	CC	0.1	\$725.00	\$72.50	Respond to DMH email
10/31/19	RP	CC	0.1	\$725.00	\$72.50	Inquire about case status
10/31/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email
10/31/19	SC	LA	0.4	\$240.00	\$96.00	Review case file, respond to RP email
10/31/19	MA	CC	0.3	\$725.00	\$217.50	Additional review, respond to email
10/31/19	SC	LA	0.1	\$240.00	\$24.00	Email question re clients to MA
10/31/19	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
10/31/19	RP	CC	0.1	\$725.00	\$72.50	Review various responsive emails
10/31/19	MA	CC	0.1	\$725.00	\$72.50	Email spreadsheet with client information to SC
10/31/19	RP	CC	0.1	\$725.00	\$72.50	Respond to MA email
10/31/19	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
\$16,727.50						

November 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/01/19	MA	CC	7.8	\$725.00	\$5,655.00	Research, revise, draft Original Complaint
11/04/19	MA	CC	4.5	\$725.00	\$3,262.50	Work on Original Complaint
11/05/19	MA	CC	3.4	\$725.00	\$2,465.00	Continue work on Original Complaint
11/05/19	MA	CC	0.1	\$725.00	\$72.50	Email DMH re additional CO plaintiffs
11/05/19	DMH	CC	0.1	\$725.00	\$72.50	Review and respond to MA email
11/05/19	MA	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
11/05/19	TM	LA	0.1	\$240.00	\$24.00	Review and respond to MA email
11/05/19	MA	CC	0.1	\$725.00	\$72.50	Email RP re: review Original Complaint
11/05/19	RP	CC	1.1	\$725.00	\$797.50	Review Original Complaint
11/05/19	SC	LA	1.5	\$240.00	\$360.00	Review Original Complaint, draft supporting documents for case initiation
11/05/19	MA	CC	0.5	\$725.00	\$362.50	Review drafts of supporting documents for case initiation
11/05/19	SC	LA	1.1	\$240.00	\$264.00	File Original Complaint [ECF NO 1]
11/05/19	SC	LA	0.3	\$240.00	\$72.00	File Civil Cover Sheet [ECF NO 2]
11/05/19	RP	CC	0.1	\$725.00	\$72.50	Forward Original Complaint to TS
11/05/19	TS	SC	0.5	\$950.00	\$475.00	Review Original Complaint
11/05/19	MA	CC	0.1	\$725.00	\$72.50	Review Notice of Electronic Filing of Original Complaint
11/05/19	MA	CC	0.1	\$725.00	\$72.50	Forward Notice of Electronic Filing of Original Complaint to DMH
11/05/19	DMH	CC	0.1	\$725.00	\$72.50	Review Notice of Electronic Filing of Original Complaint
11/05/19	MA	CC	0.4	\$725.00	\$290.00	Research local rules, email staff instructions re PHV forms
11/05/19	RP	CC	0.1	\$725.00	\$72.50	Review MA email
11/05/19	CE	LA	0.1	\$240.00	\$24.00	Review MA email
11/05/19	SC	LA	0.9	\$240.00	\$216.00	Work on PHV forms for TS and RP
11/05/19	MA	CC	0.1	\$725.00	\$72.50	Email to DMH re complete PHV form
11/05/19	MA	CC	2	\$725.00	\$1,450.00	Work on PAGA notices
11/05/19	MA	CC	0.2	\$725.00	\$145.00	Review confirmation of filing PAGA claims with LWDA, save to file, instr to staff
11/05/19	SC	LA	0.1	\$240.00	\$24.00	Update file with confirmation of filing PAGA claims
11/05/19	MA	CC	0.3	\$725.00	\$217.50	Research, further instructions to staff re payment to LWDA
11/06/19	SC	LA	0.4	\$240.00	\$96.00	Ensure payment to LWDA
11/06/19	MA	CC	0.5	\$725.00	\$362.50	Work on Notice of Filing Consent Forms
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Email SC re assistance with exhibit to notice filing
11/06/19	SC	LA	0.5	\$240.00	\$120.00	Assist MA with exhibit
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Email case filings to co-counsel
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review SC email
11/06/19	DMH	CC	0.1	\$725.00	\$72.50	Review SC email
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review SC email
11/06/19	RP	CC	0.3	\$725.00	\$217.50	Request certificate of standing from SBOT, forward to staff
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email

EXHIBIT 9

November 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review RP email
11/06/19	DH	LA	0.2	\$240.00	\$48.00	Review RP email, update case expenses
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Forward reminder to DMH that need PHV in 5 days
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review MA email, respond
11/06/19	DMH	CC	0.1	\$725.00	\$72.50	Review MA email, instructions to staff
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Further email re: new potential clients
11/06/19	DMH	CC	0.1	\$725.00	\$72.50	Respond to MA email
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review and calendar
11/06/19	TM	LA	0.5	\$240.00	\$120.00	Work on DMH PHV
11/06/19	SC	LA	0.8	\$240.00	\$192.00	Work on RP and TS PHV
11/06/19	TS	SC	0.2	\$950.00	\$190.00	Review draft PHV
11/06/19	MA	CC	0.3	\$725.00	\$217.50	Various emails re follow up with SC re exhibit
11/06/19	SC	LA	0.3	\$240.00	\$72.00	Various emails responding to MA email
11/06/19	TS	SC	0.1	\$950.00	\$95.00	Review Notice of Assignment to Judge Bernal [ECF NO. 3]
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review Notice of Assignment to Judge Bernal [ECF NO. 3]
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review Notice of Assignment to Judge Bernal [ECF NO. 3]
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review Notice of Assignment to Judge Bernal [ECF NO. 3], save to file
11/06/19	CE	LA	0.1	\$240.00	\$24.00	Review Notice of Assignment to Judge Bernal [ECF NO. 3]
11/06/19	TS	SC	0.9	\$950.00	\$855.00	Case strategy conf re judge assignment
11/06/19	RP	CC	0.9	\$725.00	\$652.50	Case strategy conf re judge assignment
11/06/19	MA	CC	0.9	\$725.00	\$652.50	Case strategy conf re judge assignment
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Email SC re preparation of summons
11/06/19	SC	LA	0.5	\$240.00	\$120.00	Respond to MA email, prep summons
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review Notice to Parties of Court-Directed ADR Program [ECF NO. 4]
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review Notice to Parties of Court-Directed ADR Program [ECF NO. 4], save
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review Notice to Parties of Court-Directed ADR Program [ECF NO. 4]
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review Notice of Deficiencies [ECF NO. 5]
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review Notice of Deficiencies [ECF NO. 5]
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review Notice of Deficiencies [ECF NO. 5], save
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Email RP re notice of interested parties
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review MA email
11/06/19	MA	CC	0.5	\$725.00	\$362.50	Telephonic conference re judge assignment
11/06/19	DMH	CC	0.5	\$725.00	\$362.50	Telephonic conference re judge assignment
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Instructions to staff to calendar PHV deadline
11/06/19	SC	LA	0.2	\$240.00	\$48.00	Calendar PHV deadline
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review notices of pro hac vice application due [ECF NOS. 6-8]
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review notices of pro hac vice application due [ECF NOS. 6-8]

November 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review notices of pro hac vice application due [ECF NOS. 6-8], save
11/06/19	CE	LA	0.1	\$240.00	\$24.00	Review notices of pro hac vice application due [ECF NOS. 6-8]
11/06/19	MA	CC	0.5	\$725.00	\$362.50	Draft Notice of Interested Parties, file
11/06/19	SC	LA	0.3	\$240.00	\$72.00	File Request for Summons [ECF NO. 10]
11/06/19	SC	LA	0.3	\$240.00	\$72.00	File Notice of Filing Consent forms [ECF NO. 11]
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review NEFS [ECF NOS. 10-11]
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review NEFS [ECF NOS. 10-11]
11/06/19	SC	LA	0.1	\$240.00	\$24.00	Review NEFS [ECF NOS. 10-11], file
11/06/19	CE	LA	0.1	\$240.00	\$24.00	Review NEFS [ECF NOS. 10-11]
11/06/19	RP	CC	0.1	\$725.00	\$72.50	Review Notice re Intra District Transfer [ECF NO. 21], Certificate [ECF NO. 22]
11/06/19	MA	CC	0.1	\$725.00	\$72.50	Review Notice re Intra District Transfer [ECF NO. 21], Certificate [ECF NO. 22]
11/06/19	SC	LA	0.2	\$240.00	\$48.00	Review Notice re Intra District Transfer [ECF NO. 21], Certificate [ECF NO. 22], save
11/07/19	SC	LA	0.3	\$240.00	\$72.00	Finalize PHV applications
11/07/19	TS	SC	0.1	\$950.00	\$95.00	Approve PHV application
11/07/19	RP	CC	0.1	\$725.00	\$72.50	Approve PHV application
11/07/19	TS	SC	0.1	\$950.00	\$95.00	Review NEFs re PHV [ECF NO. 12, 13]
11/07/19	RP	CC	0.1	\$725.00	\$72.50	Review NEFs re PHV [ECF NO. 12, 13]
11/07/19	MA	CC	0.2	\$725.00	\$145.00	Review NEFs re PHV [ECF NO. 12, 13], save
11/07/19	SC	LA	0.1	\$240.00	\$24.00	Review NEFs re PHV [ECF NO. 12, 13]
11/07/19	DMH	CC	0.7	\$725.00	\$507.50	Draft website content re case filing, email to MA
11/07/19	MA	CC	0.5	\$725.00	\$362.50	Review website content, research, revise, respond to DMH email
11/07/19	DMH	CC	0.3	\$725.00	\$217.50	Respond to MA email, instructions to staff and prep to update website
11/07/19	MA	CC	0.1	\$725.00	\$72.50	Respond to DMH email
11/07/19	MA	CC	0.1	\$725.00	\$72.50	Instructions to SC to prep notice of filing
11/07/19	SC	LA	0.4	\$240.00	\$96.00	Prep notice of filing
11/07/19	MA	CC	0.1	\$725.00	\$72.50	Review notice of filing, approve for filing
11/07/19	SC	LA	0.2	\$240.00	\$48.00	File Notice of Filing Consent forms [ECF NO. 14]
11/07/19	TS	SC	0.1	\$950.00	\$95.00	Review NEF re Consent forms [ECF NO. 14]
11/07/19	RP	CC	0.1	\$725.00	\$72.50	Review NEF re Consent forms [ECF NO. 14]
11/07/19	MA	CC	0.2	\$725.00	\$145.00	Review NEF re Consent forms [ECF NO. 14]
11/07/19	SC	LA	0.1	\$240.00	\$24.00	Review NEF re Consent forms [ECF NO. 14], save
11/07/19	TS	SC	0.1	\$950.00	\$95.00	Review NEFs re Deficiency in PHV Apps [ECF NOS. 15, 16]
11/07/19	RP	CC	0.1	\$725.00	\$72.50	Review NEFs re Deficiency in PHV Apps [ECF NOS. 15, 16]
11/07/19	MA	CC	0.2	\$725.00	\$145.00	Review NEFs re Deficiency in PHV Apps [ECF NOS. 15, 16]
11/07/19	SC	LA	0.1	\$240.00	\$24.00	Review NEFs re Deficiency in PHV Apps [ECF NOS. 15, 16], save
11/07/19	TS	SC	0.5	\$950.00	\$475.00	Discussion re next steps for dealing with local counsel situation
11/07/19	RP	CC	0.5	\$725.00	\$362.50	Discussion re next steps for dealing with local counsel situation

EXHIBIT 9

November 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/07/19	MA	CC	0.5	\$725.00	\$362.50	Discussion re next steps for dealing with local counsel situation
11/07/19	SC	LA	0.1	\$240.00	\$24.00	Email to RP and MA re next steps on PHV application
11/07/19	RP	CC	0.1	\$725.00	\$72.50	Review SC email
11/07/19	MA	CC	0.1	\$725.00	\$72.50	Review SC email
11/07/19	KB	LA	0.5	\$240.00	\$120.00	Work on DMH PHV, email MA
11/07/19	MA	CC	0.1	\$725.00	\$72.50	Review KR email
11/08/19	RP	CC	0.2	\$725.00	\$145.00	Email potential local counsel
11/08/19	RP	CC	0.5	\$725.00	\$362.50	Discuss local counsel relationship
11/11/19	TM	LA	1.4	\$240.00	\$336.00	Additional new client intake work
11/11/19	RP	CC	0.1	\$725.00	\$72.50	Email SC re new clients, file notice
11/11/19	SC	LA	0.3	\$240.00	\$72.00	Review case file, respond to RP email
11/14/19	RP	CC	0.1	\$725.00	\$72.50	Instructions to staff
11/14/19	SC	LA	0.2	\$240.00	\$48.00	File Notice of consent form
11/14/19	RP	CC	0.1	\$725.00	\$72.50	Review Filing [ECF NO. 17]
11/14/19	MA	CC	0.1	\$725.00	\$72.50	Review Filing [ECF NO. 17]
11/14/19	SC	LA	0.1	\$240.00	\$24.00	Review Filing [ECF NO. 17], save
11/14/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Bernard Tyree
11/14/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Jalee Outlaw
11/15/19	SC	LA	0.2	\$240.00	\$48.00	Review file, respond to RP email re summons
11/15/19	TM	LA	0.1	\$240.00	\$24.00	Email MA re new clients
11/15/19	MA	CC	0.1	\$725.00	\$72.50	Review TM email
11/15/19	DMH	CC	0.1	\$725.00	\$72.50	Review TM email
11/18/19	RP	CC	0.1	\$725.00	\$72.50	Respond to SC email
11/18/19	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
11/18/19	SC	LA	0.1	\$240.00	\$24.00	Respond to MA email
11/18/19	MA	CC	0.2	\$725.00	\$145.00	Review file and respond to SC email re summons
11/18/19	SC	LA	0.1	\$240.00	\$24.00	Respond to MA email
11/18/19	SC	LA	0.4	\$240.00	\$96.00	Work on and file request for summons
11/18/19	RP	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 18]
11/18/19	MA	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 18]
11/18/19	SC	LA	0.2	\$240.00	\$48.00	Review filing [ECF NO. 18], save
11/19/19	RP	CC	0.1	\$725.00	\$72.50	Review filings [ECF NOs. 19, 20]
11/19/19	MA	CC	0.1	\$725.00	\$72.50	Review filings [ECF NOs. 19, 20]
11/19/19	SC	LA	0.1	\$240.00	\$24.00	Review filings [ECF NOs. 19, 20], save
11/19/19	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
11/19/19	MA	CC	0.6	\$725.00	\$435.00	Work on amended filings
11/19/19	SC	LA	0.3	\$240.00	\$72.00	File First Amended Complaint

EXHIBIT 9

November 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/19/19	SC	LA	0.2	\$240.00	\$48.00	File Amended Summons
11/19/19	RP	CC	0.1	\$725.00	\$72.50	Review filings [ECF NOS. 23, 24]
11/19/19	MA	CC	0.1	\$725.00	\$72.50	Review filings [ECF NOS. 23, 24]
11/19/19	SC	LA	0.2	\$240.00	\$48.00	Review filings [ECF NOS. 23, 24], save
11/20/19	RP	CC	0.1	\$725.00	\$72.50	Review new client information, instructions to staff
11/20/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email
11/20/19	SC	LA	0.2	\$240.00	\$48.00	Review case file, respond to RP email
11/20/19	RP	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 25]
11/20/19	MA	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 25]
11/20/19	SC	LA	0.1	\$240.00	\$24.00	Review filing [ECF NO. 25], save
11/20/19	SC	LA	0.5	\$240.00	\$120.00	Work on notice of filing consent forms, update case file, file
11/20/19	RP	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 26]
11/20/19	MA	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 26]
11/20/19	SC	LA	0.2	\$240.00	\$48.00	Review filing [ECF NO. 26], save
11/20/19	MA	CC	0.1	\$725.00	\$72.50	Various emails re service of process
11/20/19	SC	LA	0.1	\$240.00	\$24.00	Various emails re service of process
11/20/19	SC	LA	0.5	\$240.00	\$120.00	Work on service of process
11/21/19	GD	CC	0.8	\$725.00	\$580.00	Communicate with co-counsel and my assistant re pro hac vice applications being filed
11/21/19	RP	CC	0.5	\$725.00	\$362.50	Review and execute local counsel agreement
11/21/19	TS	SC	0.1	\$950.00	\$95.00	Review initial email from opposing counsel
11/21/19	RP	CC	0.1	\$725.00	\$72.50	Review initial email from opposing counsel
11/21/19	MA	CC	0.1	\$725.00	\$72.50	Review initial email from opposing counsel
11/21/19	DMH	CC	0.1	\$725.00	\$72.50	Review initial email from opposing counsel
11/21/19	RP	CC	0.1	\$725.00	\$72.50	Email MA re case progress
11/21/19	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
11/21/19	RP	CC	0.1	\$725.00	\$72.50	Forward opposing counsel email to I/c
11/21/19	RP	CC	0.1	\$725.00	\$72.50	Email correspondence re opposing counsel to DMH
11/21/19	DMH	CC	0.1	\$725.00	\$72.50	Review and respond to RP email, set up phone call
11/21/19	RP	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
11/21/19	DMH	CC	0.1	\$725.00	\$72.50	Respond to RP email
11/22/19	RP	CC	0.3	\$725.00	\$217.50	Various emails responding to opposing counsel email
11/22/19	MA	CC	0.3	\$725.00	\$217.50	Review correspondence between RP and opposing counsel
11/22/19	DMH	CC	0.3	\$725.00	\$217.50	Review correspondence between RP and opposing counsel
11/22/19	SC	LA	0.2	\$240.00	\$48.00	Email local counsel information to co-counsel
11/22/19	KB	LA	0.1	\$240.00	\$24.00	Review SC email
11/22/19	DMH	CC	0.1	\$725.00	\$72.50	Review SC email
11/22/19	RP	CC	0.1	\$725.00	\$72.50	Review SC email

EXHIBIT 9

November 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/22/19	MA	CC	0.1	\$725.00	\$72.50	Review SC email
11/22/19	SC	LA	0.5	\$240.00	\$120.00	Work on notice of appearance, email to l/c
11/22/19	RP	CC	0.1	\$725.00	\$72.50	Review NOA
11/22/19	MA	CC	0.1	\$725.00	\$72.50	Review NOA
11/22/19	RP	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 27]
11/22/19	MA	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 27]
11/22/19	SC	LA	0.1	\$240.00	\$24.00	Review filing [ECF NO. 27]
11/22/19	TS	SC	0.3	\$950.00	\$285.00	Work on PHV application
11/22/19	RP	CC	0.2	\$725.00	\$145.00	Work on PHV application
11/22/19	SC	LA	0.6	\$240.00	\$144.00	Work on and file PHV applications
11/22/19	TS	SC	0.1	\$950.00	\$95.00	Review PHV filings [ECF NOS. 28-29]
11/22/19	RP	CC	0.1	\$725.00	\$72.50	Review PHV filings [ECF NOS. 28-29]
11/22/19	MA	CC	0.1	\$725.00	\$72.50	Review PHV filings [ECF NOS. 28-29]
11/22/19	SC	LA	0.2	\$240.00	\$48.00	Review PHV filings [ECF NOS. 28-29]
11/22/19	SC	LA	0.2	\$240.00	\$48.00	Work together with CF on PHVs
11/22/19	RP	CC	0.1	\$725.00	\$72.50	Review CF email
11/22/19	MA	CC	0.1	\$725.00	\$72.50	Review CF email
11/22/19	SC	LA	0.1	\$240.00	\$24.00	Review CF email
11/25/19	TS	SC	0.1	\$950.00	\$95.00	Review deficiency notice [ECF NO. 30]
11/25/19	RP	CC	0.1	\$725.00	\$72.50	Review deficiency notice [ECF NO. 30]
11/25/19	MA	CC	0.1	\$725.00	\$72.50	Review deficiency notice [ECF NO. 30]
11/25/19	SC	LA	0.2	\$240.00	\$48.00	Review deficiency notice [ECF NO. 30]
11/25/19	RP	CC	0.2	\$725.00	\$145.00	Var emails re fixing PHV forms
11/25/19	MA	CC	0.2	\$725.00	\$145.00	Var emails re fixing PHV forms
11/27/19	KB	LA	0.3	\$240.00	\$72.00	Finish DMH PHV, send to co-counsel
11/27/19	DMH	CC	0.1	\$725.00	\$72.50	Review KB email
11/27/19	RP	CC	0.1	\$725.00	\$72.50	Review KB email
11/27/19	MA	CC	0.1	\$725.00	\$72.50	Review KB email
11/27/19	SC	LA	0.1	\$240.00	\$24.00	Review KB email
\$37,927.00						

December 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
12/01/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - James Boggs
12/02/19	RP	CC	0.1	\$725.00	\$72.50	Review PHV filing [ECF NO. 31]
12/02/19	MA	CC	0.1	\$725.00	\$72.50	Review PHV filing [ECF NO. 31]
12/02/19	SC	LA	0.1	\$240.00	\$24.00	Review PHV filing [ECF NO. 31], save
12/03/19	RP	CC	0.2	\$725.00	\$145.00	Work on PHV filing
12/03/19	SC	LA	0.2	\$240.00	\$48.00	File RP PHV
12/03/19	RP	CC	0.1	\$725.00	\$72.50	Review PHV filings [ECF NO. 32, 33]
12/03/19	MA	CC	0.1	\$725.00	\$72.50	Review PHV filings [ECF NO. 32, 33]
12/03/19	SC	LA	0.1	\$240.00	\$24.00	Review PHV filings [ECF NO. 32, 33], save
12/03/19	SC	LA	0.2	\$240.00	\$48.00	File TS PHV
12/03/19	RP	CC	0.1	\$725.00	\$72.50	Review deficiency notice [ECF NO. 34]
12/03/19	MA	CC	0.1	\$725.00	\$72.50	Review deficiency notice [ECF NO. 34]
12/03/19	SC	LA	0.1	\$240.00	\$24.00	Review deficiency notice [ECF NO. 34], save
12/03/19	RP	CC	0.1	\$725.00	\$72.50	Email re deficiencies
12/03/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email
12/03/19	SC	LA	0.1	\$240.00	\$24.00	Review and respond to RP email
12/04/19	SC	LA	0.1	\$240.00	\$24.00	Email MA re service on Defendant
12/05/19	MA	CC	0.2	\$725.00	\$145.00	Respond to SC email re service on Defendant
12/05/19	SC	LA	0.2	\$240.00	\$48.00	Calculate deadline, respond to MA email
12/11/19	RP	CC	0.1	\$725.00	\$72.50	Internal email re local counsel
12/11/19	MA	CC	0.1	\$725.00	\$72.50	Review RP email
12/11/19	TM	LA	2	\$240.00	\$480.00	Initial intake - Andrew Moses, Ronald Burkhammer, Donnie Sandoval, Angel Grant
12/11/19	TM	LA	0.1	\$240.00	\$24.00	Email MA, DMH re new cases
12/11/19	DMH	CC	0.1	\$725.00	\$72.50	Review TM email
12/11/19	MA	CC	0.1	\$725.00	\$72.50	Review and respond to TM email
12/11/19	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Brian Wilburn
12/11/19	TM	LA	0.1	\$240.00	\$24.00	Email MA, DMH re Wilburn
12/11/19	DMH	CC	0.1	\$725.00	\$72.50	Review TM email
12/11/19	MA	CC	0.1	\$725.00	\$72.50	Review and respond to TM email
12/12/19	RP	CC	0.1	\$725.00	\$72.50	Email DMH re new clients
12/12/19	MA	CC	0.1	\$725.00	\$72.50	Review and respond to RP email
12/12/19	DMH	CC	0.1	\$725.00	\$72.50	Review RP email
12/12/19	MA	CC	0.3	\$725.00	\$217.50	Various emails re uploading client materials
12/12/19	TM	LA	0.3	\$240.00	\$72.00	Various emails re uploading client materials

EXHIBIT 9

December 2019

Date	Timekeeper	Role	Hours	Rate	Fee	Description
12/13/19	TM	LA	1.1	\$240.00	\$264.00	Initial intake - Alice Dawson, Darrius Patterson, email
12/13/19	DMH	CC	0.1	\$725.00	\$72.50	Review TM email
12/13/19	MA	CC	0.1	\$725.00	\$72.50	Review TM email
12/13/19	RP	CC	0.1	\$725.00	\$72.50	Review TM email
12/13/19	MA	CC	0.5	\$725.00	\$362.50	Review new intakes, redraft intake questionnaire, send to DMH
12/13/19	DMH	CC	0.1	\$725.00	\$72.50	Review MA email, instructions to staff
12/16/19	MA	CC	8.1	\$725.00	\$5,872.50	Legal research and draft conditional certification motion
12/17/19	MA	CC	7.2	\$725.00	\$5,220.00	Legal research and draft conditional certification motion
12/18/19	MA	CC	9.5	\$725.00	\$6,887.50	Legal research and draft conditional certification motion
12/30/19	RP	CC	0.1	\$725.00	\$72.50	Review orders granting admission PHV [36-38]
12/30/19	MA	CC	0.1	\$725.00	\$72.50	Review orders granting admission PHV [36-38]
12/30/19	SC	LA	0.3	\$240.00	\$72.00	Review orders granting admission PHV [36-38], save
\$21,957.50						

2020 Q1, Q2 Billing Summary **\$311,814.00**

January 2020	
Timekeeper	Total Amount Billed
Colin Elliott (CE)	\$1,560.00
David Matthew Haynie (DMH)	\$145.00
Melinda Arbuckle (MA)	\$7,250.00
Ricardo Prieto (RP)	\$3,480.00
Susan Cavanaugh (SC)	\$3,768.00
Trena Mack (TM)	\$72.00
	\$16,275.00

February 2020	
Timekeeper	Total Amount Billed
David Matthew Haynie (DMH)	\$1,740.00
Melinda Arbuckle (MA)	\$36,032.50
Meredith Mathews Black (MMB)	\$135.00
Ricardo Prieto (RP)	\$9,207.50
Susan Cavanaugh (SC)	\$3,914.00
Trena Mack (TM)	\$504.00
Todd Slobin (TS)	\$1,330.00
	\$52,863.00

March 2020	
Timekeeper	Total Amount Billed
Andrea Willingham Rios (ARW)	\$48.00
Melinda Arbuckle (MA)	\$36,250.00
Mark Lazarz (ML)	\$380.00
Ricardo Prieto (RP)	\$4,060.00
Susan Cavanaugh (SC)	\$1,104.00
Trena Mack (TM)	\$240.00
Todd Slobin (TS)	\$2,185.00
	\$44,267.00

April 2020

Timekeeper	Total Amount Billed
David Matthew Haynie (DMH)	\$217.50
Melinda Arbuckle (MA)	\$66,845.00
Ricardo Prieto (RP)	\$31,247.50
Susan Cavanaugh (SC)	\$3,962.00
Trena Mack (TM)	\$1,680.00
	\$103,952.00

May 2020

Timekeeper	Total Amount Billed
David Matthew Haynie (DMH)	\$1,015.00
Jesse "Jay" Forester (JF)	\$870.00
Melinda Arbuckle (MA)	\$8,845.00
Mark Lazarz (ML)	\$285.00
Ricardo Prieto (RP)	\$3,915.00
Susan Cavanaugh (SC)	\$1,824.00
Todd Slobin (TS)	\$475.00
	\$17,229.00

June 2020

Timekeeper	Total Amount Billed
Danielle Hopkins (DH)	\$744.00
David Matthew Haynie (DMH)	\$145.00
Melinda Arbuckle (MA)	\$39,434.00
Ricardo Prieto (RP)	\$20,735.00
Susan Cavanaugh (SC)	\$8,400.00
Todd Slobin (TS)	\$7,410.00
Yeneby Angeles (YA)	\$360.00
	\$77,228.00

January 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
01/02/20	RP	CC	0.2	\$725.00	\$145.00	Review case files, email MA re potential new clients
01/02/20	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
01/02/20	RP	CC	0.1	\$725.00	\$72.50	Respond to MA email
01/02/20	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
01/02/20	RP	CC	0.1	\$725.00	\$72.50	Email SC re client project
01/02/20	SC	LA	0.8	\$240.00	\$192.00	Review RP email, work on client project
01/17/20	RP	CC	0.2	\$725.00	\$145.00	Review and instructions to staff re GD invoice
01/21/20	RP	CC	0.5	\$725.00	\$362.50	Case strategy conference
01/21/20	MA	CC	0.5	\$725.00	\$362.50	Case strategy conference
01/21/20	SC	LA	0.5	\$240.00	\$120.00	Case strategy conference
01/21/20	CE	LA	0.5	\$240.00	\$120.00	Case strategy conference
01/24/20	MA	CC	4.2	\$725.00	\$3,045.00	Work on conditional certification briefing
01/24/20	RP	CC	2.3	\$725.00	\$1,667.50	Review MA work on conditional certification briefing
01/24/20	MA	CC	0.3	\$725.00	\$217.50	Various emails re conditional certification briefing
01/24/20	RP	CC	0.3	\$725.00	\$217.50	Various emails re conditional certification briefing
01/24/20	RP	CC	0.1	\$725.00	\$72.50	Review order to show cause [ECF NO. 39]
01/24/20	MA	CC	0.1	\$725.00	\$72.50	Review order to show cause [ECF NO. 39]
01/24/20	SC	LA	0.1	\$240.00	\$24.00	Review order to show cause [ECF NO. 39]
01/24/20	RP	CC	0.5	\$725.00	\$362.50	Case strategy conference
01/24/20	MA	CC	0.5	\$725.00	\$362.50	Case strategy conference
01/24/20	MA	CC	0.2	\$725.00	\$145.00	Review relevant rules, email court coordinator
01/24/20	RP	CC	0.1	\$725.00	\$72.50	Review MA email to CC
01/24/20	SC	LA	0.1	\$240.00	\$24.00	Review MA email to CC
01/24/20	DMH	CC	0.1	\$725.00	\$72.50	Review MA email to CC
01/27/20	RP	CC	0.2	\$725.00	\$145.00	Various emails with MA re Allied
01/27/20	MA	CC	1.4	\$725.00	\$1,015.00	Additional work on declaration for certification briefing
01/27/20	SC	LA	4.5	\$240.00	\$1,080.00	Work on gathering declarations
01/27/20	CE	LA	6	\$240.00	\$1,440.00	Work on gathering declarations
01/27/20	MA	CC	2.1	\$725.00	\$1,522.50	Work with Dennis Clay
01/27/20	SC	LA	0.9	\$240.00	\$216.00	Work on and file Notice of filing consent forms
01/27/20	RP	CC	0.1	\$725.00	\$72.50	Review notice [ECF NO. 40]
01/27/20	MA	CC	0.1	\$725.00	\$72.50	Review notice [ECF NO. 40]
01/27/20	SC	LA	0.1	\$240.00	\$24.00	Review notice [ECF NO. 40], save

EXHIBIT 9

January 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
01/28/20	MA	CC	0.2	\$725.00	\$145.00	Various emails re show cause order
01/28/20	SC	LA	0.2	\$240.00	\$48.00	Various emails re show cause order
01/29/20	SC	LA	3.4	\$240.00	\$816.00	Further work on gathering declarations
01/29/20	SC	LA	0.3	\$240.00	\$72.00	Work on and file Notice of filing consent forms
01/29/20	RP	CC	0.1	\$725.00	\$72.50	Review notice [ECF NO. 41]
01/29/20	MA	CC	0.1	\$725.00	\$72.50	Review notice [ECF NO. 41]
01/29/20	SC	LA	0.2	\$240.00	\$48.00	Review email from client, forward to MA
01/29/20	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
01/29/20	TM	LA	0.1	\$240.00	\$24.00	Review emails re client concerns
01/29/20	TM	LA	0.2	\$240.00	\$48.00	Work with client to address concern
01/29/20	DMH	CC	0.1	\$725.00	\$72.50	Review and respond to MA email re client concern
01/29/20	SC	LA	0.1	\$240.00	\$24.00	Review notice [ECF NO. 41], save
01/29/20	SC	LA	0.4	\$240.00	\$96.00	Finalize Patterson declaration
01/30/20	SC	LA	0.5	\$240.00	\$120.00	Finalize Snyder declaration
01/30/20	SC	LA	0.5	\$240.00	\$120.00	Finalize Moore declaration
01/30/20	SC	LA	0.6	\$240.00	\$144.00	Finalize Jones declaration
01/31/20	SC	LA	1.1	\$240.00	\$264.00	Work on Grant declaration
01/31/20	SC	LA	0.9	\$240.00	\$216.00	Work on Burkhammer declaration
01/31/20	SC	LA	0.5	\$240.00	\$120.00	Finalize McGee declaration
\$16,275.00						

February 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/02/20	MA	CC	7.1	\$725.00	\$5,147.50	Finish first draft conditional certificaion brief.
02/03/20	TM	LA	0.8	\$240.00	\$192.00	Review and organize Dennis Clay emails
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Email re status of declarations
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Review SC email, respond
02/03/20	RP	CC	0.1	\$725.00	\$72.50	Review SC email
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Request service on registered agent
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Review MA email
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Review response from process server
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Review response from process server
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Forward email from process server to MA
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Review email from SC, respond
02/03/20	MA	CC	0.4	\$725.00	\$290.00	Review declarations
02/03/20	MA	CC	0.6	\$725.00	\$435.00	Monitor service of process
02/03/20	SC	LA	0.6	\$240.00	\$144.00	Monitor service of process
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Email RP re service of process
02/03/20	RP	CC	0.1	\$725.00	\$72.50	Review and respond to MA email
02/03/20	MA	CC	0.7	\$725.00	\$507.50	Finalize Clay declaration, instructions to staff
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Questions for co-counsel re Clay
02/03/20	TM	LA	0.2	\$240.00	\$48.00	Review case file, provide information to SC
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Update case file
02/03/20	SC	LA	1.1	\$700.00	\$770.00	Work on Clay declaration, speak with client
02/03/20	MA	CC	0.6	\$725.00	\$435.00	Further conference with Clay, edit declaration
02/03/20	MA	CC	0.3	\$725.00	\$217.50	Various emails re Dennis Clay
02/03/20	DMH	CC	0.3	\$725.00	\$217.50	Various emails re Dennis Clay
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Email SC re status of service
02/03/20	RP	CC	0.3	\$725.00	\$217.50	Various emails re service of process effected
02/03/20	MA	CC	0.3	\$725.00	\$217.50	Various emails re service of process effected
02/03/20	SC	LA	0.3	\$240.00	\$72.00	Various emails re service of process effected
02/03/20	SC	LA	0.3	\$240.00	\$72.00	Prep and file Proof of Service
02/03/20	RP	CC	0.1	\$725.00	\$72.50	Review proof of service filing [ECF NO. 42]
02/03/20	MA	CC	0.1	\$725.00	\$72.50	Review proof of service filing [ECF NO. 42]
02/03/20	SC	LA	0.1	\$240.00	\$24.00	Review proof of service filing [ECF NO. 42]
02/03/20	MA	CC	0.3	\$725.00	\$217.50	Various emails re case status
02/03/20	DMH	CC	0.3	\$725.00	\$217.50	Various emails re case status
02/04/20	MA	CC	0.5	\$725.00	\$362.50	Case strategy conference
02/04/20	RP	CC	0.5	\$725.00	\$362.50	Case strategy conference

EXHIBIT 9

February 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/04/20	MA	CC	0.2	\$725.00	\$145.00	Email opposing counsel re service and for position on conditional certification
02/04/20	RP	CC	0.1	\$725.00	\$72.50	Review MA email
02/04/20	MA	CC	0.3	\$725.00	\$217.50	Review and respond to opposing counsel email
02/04/20	RP	CC	0.1	\$725.00	\$72.50	Review opposing counsel email
02/04/20	MA	CC	0.3	\$725.00	\$217.50	Review and respond to further opposing counsel email
02/04/20	RP	CC	0.1	\$725.00	\$72.50	Review email
02/04/20	SC	LA	0.2	\$240.00	\$48.00	Review call log, forward to MA for return call
02/04/20	MA	CC	0.9	\$725.00	\$652.50	Call with Clay
02/04/20	DMH	CC	0.1	\$725.00	\$72.50	Forward PSA to MA
02/04/20	TM	LA	0.1	\$240.00	\$24.00	review DMH email
02/04/20	SC	LA	0.1	\$240.00	\$24.00	review DMH email
02/04/20	MA	CC	0.1	\$725.00	\$72.50	review DMH email
02/04/20	SC	LA	0.5	\$240.00	\$120.00	Prep and file notice of consent (Clay)
02/04/20	RP	CC	0.1	\$725.00	\$72.50	Review notice of consent filed [ECF NO. 43]
02/04/20	MA	CC	0.1	\$725.00	\$72.50	Review notice of consent filed [ECF NO. 43]
02/04/20	SC	LA	0.1	\$240.00	\$24.00	Review notice of consent filed [ECF NO. 43], save
02/04/20	RP	CC	0.1	\$725.00	\$72.50	Review notice of consent filed [ECF NO. 44]
02/04/20	MA	CC	0.1	\$725.00	\$72.50	Review notice of consent filed [ECF NO. 44]
02/04/20	SC	LA	0.1	\$240.00	\$24.00	Review notice of consent filed [ECF NO. 44]
02/04/20	RP	CC	2.7	\$725.00	\$1,957.50	Legal research re conditional certification
02/04/20	MA	CC	4.5	\$725.00	\$3,262.50	Additional legal research re conditional certification
02/05/20	SC	LA	0.1	\$240.00	\$24.00	Review and forward privileged client communication
02/05/20	MA	CC	0.2	\$725.00	\$145.00	Review SC email, respond
02/05/20	SC	LA	0.5	\$240.00	\$120.00	Prep and file notice of consent (DeMasi)
02/06/20	MA	CC	0.4	\$725.00	\$290.00	Various confidential communications with Dennis Clay
02/06/20	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel requesting pre-motion conference, respond
02/06/20	RP	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel requesting pre-motion conference
02/06/20	MA	CC	0.3	\$725.00	\$217.50	Various emails setting conference call
02/06/20	RP	CC	0.3	\$725.00	\$217.50	Various emails setting conference call
02/06/20	SC	LA	0.2	\$240.00	\$48.00	Facilitate conference call
02/06/20	RP	CC	0.1	\$725.00	\$72.50	Email MA re case strategy
02/06/20	MA	CC	0.1	\$725.00	\$72.50	Review and respond to RP email
02/06/20	TS	SC	0.5	\$950.00	\$475.00	Case strategy conference
02/06/20	RP	CC	0.5	\$725.00	\$362.50	Case strategy conference
02/06/20	MA	CC	0.5	\$725.00	\$362.50	Case strategy conference
02/06/20	MA	CC	0.2	\$725.00	\$145.00	Review Clay declaration

EXHIBIT 9

February 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/06/20	MA	CC	0.4	\$725.00	\$290.00	Draft Response to Show Cause, email RP for review
02/06/20	RP	CC	0.2	\$725.00	\$145.00	Review draft response
02/06/20	MA	CC	0.1	\$725.00	\$72.50	Finalize response, instructions to staff
02/06/20	SC	LA	0.5	\$240.00	\$120.00	Work on filing response
02/06/20	RP	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 45]
02/06/20	MA	CC	0.1	\$725.00	\$72.50	Review filing [ECF NO. 45]
02/06/20	SC	LA	0.1	\$240.00	\$24.00	Review filing [ECF NO. 45], save
02/10/20	SC	LA	0.5	\$240.00	\$120.00	Work with client on declaration, review email, forward to MA
02/10/20	MA	CC	0.3	\$725.00	\$217.50	Review client email, respond to SC
02/10/20	SC	LA	0.2	\$240.00	\$48.00	Respond to MA email
02/11/20	MA	CC	1.4	\$725.00	\$1,015.00	Revise Allied declarations
02/11/20	MA	CC	0.3	\$725.00	\$217.50	Discuss revisions to Allied declarations
02/11/20	SC	LA	0.3	\$240.00	\$72.00	Discuss revisions to Allied declarations
02/11/20	SC	LA	0.4	\$240.00	\$96.00	Draft and file Notice of consent
02/11/20	RP	CC	0.1	\$725.00	\$72.50	Review notice of consent [ECF NO. 46]
02/11/20	MA	CC	0.1	\$725.00	\$72.50	Review notice of consent [ECF NO. 46]
02/11/20	SC	LA	0.1	\$240.00	\$24.00	Review notice of consent [ECF NO. 46], save
02/11/20	SC	LA	3.1	\$240.00	\$744.00	Work on gathering revised declarations
02/11/20	MA	CC	5.4	\$725.00	\$3,915.00	Final revisions to motion for certification
02/11/20	RP	CC	2.1	\$725.00	\$1,522.50	Review motion for certification
02/11/20	TS	SC	0.9	\$950.00	\$855.00	Prep and attend call with opposing counsel
02/11/20	RP	CC	0.9	\$725.00	\$652.50	Prep and attend call with opposing counsel
02/11/20	MA	CC	0.9	\$725.00	\$652.50	Prep and attend call with opposing counsel
02/11/20	MA	CC	0.2	\$725.00	\$145.00	Review opposing counsel email attaching arbitration agreement, instructions to staff
02/11/20	RP	CC	0.2	\$725.00	\$145.00	Review opposing counsel email attaching arbitration agreement
02/11/20	MA	CC	0.1	\$725.00	\$72.50	Email opposing counsel re conference
02/12/20	SC	LA	0.1	\$240.00	\$24.00	Email MA update re declarations
02/12/20	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
02/12/20	MA	CC	8.1	\$725.00	\$5,872.50	Incorporate revisions, finalized motion for certification for filing, instructions to staff
02/12/20	SC	LA	0.9	\$240.00	\$216.00	Work on motion for certification, prep table of authorities.
02/12/20	MA	CC	0.9	\$725.00	\$652.50	Review correspondence and attachment from opposing counsel
02/12/20	RP	CC	0.8	\$725.00	\$580.00	Review correspondence and attachment from opposing counsel
02/13/20	MA	CC	1.2	\$725.00	\$870.00	Further review and respond to correspondence
02/13/20	RP	CC	0.3	\$725.00	\$217.50	Review MA email, respond to MA
02/13/20	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
02/13/20	MA	CC	2.2	\$725.00	\$1,595.00	Fix appendix, table of authorities

February 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/13/20	SC	LA	1.4	\$240.00	\$336.00	Work on and file motion for certification
02/13/20	RP	CC	0.1	\$725.00	\$72.50	Review filings [ECF NO. 47-48]
02/13/20	MA	CC	0.1	\$725.00	\$72.50	Review filings [ECF NO. 47-48]
02/13/20	SC	LA	0.1	\$240.00	\$24.00	Review filings [ECF NO. 47-48], save
02/13/20	DMH	CC	1.5	\$725.00	\$1,087.50	Review motion for certification, email co counsel
02/13/20	RP	CC	0.3	\$725.00	\$217.50	Various emails re motion for certification
02/13/20	MA	CC	0.3	\$725.00	\$217.50	Various emails re motion for certification
02/13/20	MMB	AT	0.2	\$450.00	\$90.00	Various emails re motion for certification
02/13/20	SC	LA	0.1	\$240.00	\$24.00	Forward filings to opposing counsel
02/13/20	MA	CC	0.2	\$725.00	\$145.00	Review email from opposing counsel, discuss
02/13/20	RP	CC	0.2	\$725.00	\$145.00	Review email from opposing counsel, discuss
02/13/20	RP	CC	0.1	\$725.00	\$72.50	Review order discharging order to show cause [ECF NO. 49]
02/13/20	MA	CC	0.1	\$725.00	\$72.50	Review order discharging order to show cause [ECF NO. 49]
02/13/20	SC	LA	0.1	\$240.00	\$24.00	Review order discharging order to show cause [ECF NO. 49], save
02/13/20	MA	CC	0.4	\$725.00	\$290.00	Respond to opposing counsel email
02/13/20	RP	CC	0.1	\$725.00	\$72.50	Email MA re email to opposing counsel
02/13/20	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
02/13/20	MA	CC	0.1	\$725.00	\$72.50	Forward email to DMH, MB
02/13/20	DMH	CC	0.1	\$725.00	\$72.50	Review MA email
02/13/20	MMB	AT	0.1	\$450.00	\$45.00	Review and respond to MA email
02/13/20	MA	CC	0.3	\$725.00	\$217.50	Review opposing counsel response email, various emails scheduling call
02/14/20	MA	CC	0.5	\$725.00	\$362.50	Prep and attend call with opposing counsel
02/14/20	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel re stipulation
02/14/20	RP	CC	0.2	\$725.00	\$145.00	Various emails regarding stipulation
02/14/20	MA	CC	0.2	\$725.00	\$145.00	Various emails regarding stipulation
02/14/20	MA	CC	1.5	\$725.00	\$1,087.50	Draft stipulation
02/14/20	MA	CC	0.3	\$725.00	\$217.50	Review defendant edits, make proposals
02/14/20	MA	CC	0.1	\$725.00	\$72.50	Review opposing counsel email
02/14/20	MA	CC	0.2	\$725.00	\$145.00	Finalize stipulation
02/14/20	SC	LA	0.4	\$240.00	\$96.00	Review and file stipulation
02/14/20	RP	CC	0.1	\$725.00	\$72.50	Review filing stipulation [ECF NO. 50]
02/14/20	MA	CC	0.1	\$725.00	\$72.50	Review filing stipulation [ECF NO. 50]
02/14/20	SC	LA	0.1	\$240.00	\$24.00	Review filing stipulation [ECF NO. 50], save
02/14/20	MA	CC	0.4	\$725.00	\$290.00	Amend stipulation, confer with opposing counsel
02/14/20	SC	LA	0.3	\$240.00	\$72.00	file amended stipulation
02/14/20	RP	CC	0.1	\$725.00	\$72.50	Review filing amended stipulation [ECF NO. 51]

EXHIBIT 9

February 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/14/20	MA	CC	0.1	\$725.00	\$72.50	Review filing amended stipulation [ECF NO. 51]
02/14/20	SC	LA	0.1	\$240.00	\$24.00	Review filing amended stipulation [ECF NO. 51], save
02/17/20	MA	CC	0.3	\$725.00	\$217.50	Review correspondence from opposing counsel, discuss
02/17/20	RP	CC	0.3	\$725.00	\$217.50	Review correspondence from opposing counsel, discuss
02/17/20	MA	CC	0.2	\$725.00	\$145.00	Review email from opposing counsel attaching Guerra arbitration agreement
02/18/20	MA	CC	0.4	\$725.00	\$290.00	Privileged client communications with Dennis Clay
02/19/20	TM	LA	0.5	\$240.00	\$120.00	Initial intake - Brian Rodney
02/19/20	DMH	CC	0.1	\$725.00	\$72.50	Email MA and RP re case status
02/19/20	RP	CC	0.1	\$725.00	\$72.50	review DMH email
02/19/20	MA	CC	0.1	\$725.00	\$72.50	review DMH email
02/21/20	MA	CC	0.5	\$725.00	\$362.50	Various additional privileged client communications with Dennis Clay
02/21/20	RP	CC	0.1	\$725.00	\$72.50	Review order granting stipulation [ECF NO. 52]
02/21/20	MA	CC	0.1	\$725.00	\$72.50	Review order granting stipulation [ECF NO. 52]
02/21/20	SC	LA	0.1	\$240.00	\$24.00	Review order granting stipulation [ECF NO. 52], save
02/21/20	RP	CC	0.2	\$725.00	\$145.00	Various emails re order
02/21/20	MA	CC	0.2	\$725.00	\$145.00	Various emails re order
02/24/20	SC	LA	0.1	\$240.00	\$24.00	Email filing to opposing counsel
02/24/20	MA	CC	0.1	\$725.00	\$72.50	Review SC email
02/24/20	RP	CC	0.1	\$725.00	\$72.50	Review SC email
02/24/20	RP	CC	0.4	\$725.00	\$290.00	Review answer [ECF NO. 53]
02/24/20	MA	CC	0.7	\$725.00	\$507.50	Review answer [ECF NO. 53]
02/24/20	SC	LA	0.1	\$240.00	\$24.00	Review answer [ECF NO. 53], save
02/25/20	TM	LA	0.5	\$240.00	\$120.00	Initial intake - John Titus
02/25/20	RP	CC	0.2	\$725.00	\$145.00	Review case filings [ECF NOs. 54-55]
02/25/20	MA	CC	0.2	\$725.00	\$145.00	Review case filings [ECF NOs. 54-55]
02/25/20	SC	LA	0.2	\$240.00	\$48.00	Review case filings [ECF NOs. 54-55], save
02/28/20	RP	CC	0.1	\$725.00	\$72.50	Review case filing [ECF NO. 56] - R26f conf
02/28/20	MA	CC	0.1	\$725.00	\$72.50	Review case filing [ECF NO. 56] - R26f conf
02/28/20	SC	LA	0.1	\$240.00	\$24.00	Review case filing [ECF NO. 56] - R26f conf, save
\$52,863.00						

March 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
3/2/2020	TM	LA	0.5	\$240.00	\$120.00	Initial case intake - Beatrice Augusta
3/9/2020	ML	SC	0.4	\$950.00	\$380.00	Case discussion
3/9/2020	TS	SC	0.4	\$950.00	\$380.00	Case discussion
3/9/2020	RP	CC	0.4	\$725.00	\$290.00	Case discussion
3/9/2020	MA	CC	0.4	\$725.00	\$290.00	Case discussion
3/16/2020	RP	CC	0.5	\$725.00	\$362.50	Review Motion to Stay [ECF NO. 57]
3/16/2020	MA	CC	1.8	\$725.00	\$1,305.00	Review Motion to Stay [ECF NO. 57]
3/16/2020	SC	LA	0.3	\$240.00	\$72.00	Review Motion to Stay [ECF NO. 57], save
3/16/2020	SC	LA	0.1	\$240.00	\$24.00	Email MA question re calendaring
3/16/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to SC question
3/16/2020	RP	CC	0.5	\$725.00	\$362.50	Review Motions to Compel Arbitration [ECF NOS. 58-65; 66-76]
3/16/2020	MA	CC	6.5	\$725.00	\$4,712.50	Review all Motions to Compel Arbitration, begin organization of responsive briefing
3/16/2020	SC	LA	0.9	\$240.00	\$216.00	Save Motions to Compel Arbitration
3/16/2020	SC	LA	0.3	\$240.00	\$72.00	Draft and file notice of consents [ECF NO. 66], save
3/16/2020	SC	LA	0.3	\$240.00	\$72.00	Various emails re filing
3/16/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re filing
3/16/2020	ARW	LA	0.2	\$240.00	\$48.00	Various emails re filing
3/17/2020	TM	LA	0.5	\$240.00	\$120.00	Initial case intake - John Wood
3/18/2020	RP	CC	0.4	\$725.00	\$290.00	Prep and attend case strategy conference
3/18/2020	MA	CC	0.4	\$725.00	\$290.00	Prep and attend case strategy conference
3/18/2020	MA	CC	4.5	\$725.00	\$3,262.50	Legal research re defendant's arbitration motions
3/18/2020	RP	CC	0.2	\$725.00	\$145.00	Email TS re case strategy
3/18/2020	TS	SC	0.1	\$950.00	\$95.00	Review and respond to RP email
3/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review RP email
3/18/2020	TS	SC	0.4	\$950.00	\$380.00	Discuss case
3/18/2020	MA	CC	0.4	\$725.00	\$290.00	Discuss case
3/18/2020	RP	CC	0.1	\$725.00	\$72.50	Request extension on briefing motions to compel arbitration from opposing counsel
3/18/2020	TS	SC	0.1	\$950.00	\$95.00	Review RP email
3/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review RP email
3/18/2020	SC	LA	0.1	\$240.00	\$24.00	Review RP email
3/19/2020	RP	CC	0.1	\$725.00	\$72.50	Review response from opposing counsel
3/19/2020	TS	SC	0.1	\$950.00	\$95.00	Review response from opposing counsel
3/19/2020	MA	CC	0.1	\$725.00	\$72.50	Review response from opposing counsel
3/19/2020	SC	LA	0.1	\$240.00	\$24.00	Review response from opposing counsel
3/19/2020	MA	CC	0.2	\$725.00	\$145.00	Revise stipulation
3/19/2020	TS	SC	0.1	\$950.00	\$95.00	Email proposal to opposing counsel

March 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
3/19/2020	MA	CC	0.1	\$725.00	\$72.50	Review RP email
3/19/2020	SC	LA	0.1	\$240.00	\$24.00	Review RP email
3/19/2020	MA	CC	0.2	\$725.00	\$145.00	Review RP email
3/19/2020	MA	CC	5.3	\$725.00	\$3,842.50	Research Hakeem case
3/19/2020	MA	CC	0.4	\$725.00	\$290.00	Various emails re obtaining case documents from CA state ct
3/19/2020	SC	LA	0.4	\$240.00	\$96.00	Various emails re obtaining case documents from CA state ct
3/19/2020	TS	SC	0.3	\$950.00	\$285.00	Various emails re including local counsel
3/19/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re including local counsel
3/19/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails re including local counsel
3/20/2020	MA	CC	1.7	\$725.00	\$1,232.50	Research Stone case, email to RP
3/20/2020	RP	CC	0.4	\$725.00	\$290.00	Review MA email and Stone settlement
3/20/2020	TS	SC	0.3	\$950.00	\$285.00	Various emails re extend case deadlines
3/20/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails re extend case deadlines
3/20/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re extend case deadlines
3/20/2020	SC	LA	0.3	\$240.00	\$72.00	Various emails re extend case deadlines
3/20/2020	MA	CC	8.1	\$725.00	\$5,872.50	Continue work on opposition to motions to compel arbitration
3/20/2020	MA	CC	0.4	\$725.00	\$290.00	Review and edit stipulation
3/20/2020	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to file stipulation
3/20/2020	SC	LA	0.3	\$240.00	\$72.00	Work on and file second stipulation to continue hearing
3/20/2020	RP	CC	0.1	\$725.00	\$72.50	Review stipulation [ECF NO. 77]
3/20/2020	MA	CC	0.1	\$725.00	\$72.50	Review stipulation [ECF NO. 77]
3/20/2020	SC	LA	0.1	\$240.00	\$24.00	Review stipulation [ECF NO. 77], save
3/21/2020	TS	SC	0.2	\$950.00	\$190.00	Various discussions regarding local counsel interest
3/21/2020	RP	CC	0.2	\$725.00	\$145.00	Various discussions regarding local counsel interest
3/21/2020	MA	CC	0.2	\$725.00	\$145.00	Various discussions regarding local counsel interest
3/23/2020	MA	CC	0.2	\$725.00	\$145.00	Review and respond to opposing counsel email re stipulation
3/23/2020	RP	CC	0.1	\$725.00	\$72.50	Review opposing counsel email
3/23/2020	RP	CC	0.1	\$725.00	\$72.50	Review NOA (Tate) [ECF NO. 78]
3/23/2020	MA	CC	0.1	\$725.00	\$72.50	Review NOA (Tate) [ECF NO. 78]
3/23/2020	SC	LA	0.1	\$240.00	\$24.00	Review NOA (Tate) [ECF NO. 78], save
3/23/2020	RP	CC	0.4	\$725.00	\$290.00	Review filings [ECF NOs. 79-87]
3/23/2020	MA	CC	0.4	\$725.00	\$290.00	Review filings [ECF NOs. 79-87]
3/23/2020	SC	LA	0.9	\$240.00	\$216.00	Review filings [ECF NOs. 79-87], save
3/23/2020	RP	CC	0.6	\$725.00	\$435.00	Case strategy conference
3/23/2020	MA	CC	0.6	\$725.00	\$435.00	Case strategy conference
3/24/2020	TS	SC	0.3	\$950.00	\$285.00	Discuss local counsel arrangement

EXHIBIT 9

March 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
3/24/2020	RP	CC	0.3	\$725.00	\$217.50	Discuss local counsel arrangement
3/24/2020	MA	CC	0.3	\$725.00	\$217.50	Discuss local counsel arrangement
3/24/2020	RP	CC	0.1	\$725.00	\$72.50	Review notice of deficiencies [ECF NO. 88]
3/24/2020	MA	CC	0.1	\$725.00	\$72.50	Review notice of deficiencies [ECF NO. 88]
3/24/2020	SC	LA	0.1	\$240.00	\$24.00	Review notice of deficiencies [ECF NO. 88], save
3/24/2020	RP	CC	0.1	\$725.00	\$72.50	review order granting second stipulation [ECF NO. 89]
3/24/2020	MA	CC	0.1	\$725.00	\$72.50	review order granting second stipulation [ECF NO. 89]
3/24/2020	SC	LA	0.1	\$240.00	\$24.00	review order granting second stipulation [ECF NO. 89], save
3/24/2020	MA	CC	7.1	\$725.00	\$5,147.50	Review opposition to notice - legal research
3/24/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel re Hakeem
3/24/2020	RP	CC	0.2	\$725.00	\$145.00	Review and respond to email from opposing counsel re Hakeem
3/24/2020	SC	LA	0.1	\$240.00	\$24.00	Email MA question re calendaring
3/24/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to SC question re calendaring
3/26/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel re client communications
3/26/2020	RP	CC	0.1	\$725.00	\$72.50	Review and respond to email from opposing counsel re client communications
3/30/2020	MA	CC	0.1	\$725.00	\$72.50	Review response from opposing counsel
3/30/2020	RP	CC	0.1	\$725.00	\$72.50	Review response from opposing counsel
3/30/2020	MA	CC	8.6	\$725.00	\$6,235.00	Legal research and draft opposition to defendant's motions to compel arbitration
						\$44,267.00

April 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/01/20	RP	CC	0.1	\$725.00	\$72.50	Email requesting SC pull documents and calendar Hakeem case
04/01/20	MA	CC	0.1	\$725.00	\$72.50	Review RP email
04/01/20	SC	LA	1.3	\$240.00	\$312.00	Work on Hakeem case file
04/01/20	MA	CC	4.3	\$725.00	\$3,117.50	Work on response in opposition to motion for stay
04/01/20	MA	CC	0.1	\$725.00	\$72.50	Email TM re opt-out of Hakeem settlement
04/01/20	TM	LA	0.1	\$240.00	\$24.00	Review MA email
04/02/20	TM	LA	3.2	\$240.00	\$768.00	Work on opting plaintiffs out of Hakeem settlement
04/03/20	TM	LA	2.1	\$240.00	\$504.00	Work on opting plaintiffs out of Hakeem settlement
04/07/20	TM	LA	1.3	\$240.00	\$312.00	Finalize opt out forms, send to co-counsel
04/09/20	SC	LA	0.1	\$240.00	\$24.00	Email RP re opt out forms
04/09/20	RP	CC	0.1	\$725.00	\$72.50	Respond to SC email
04/09/20	MA	CC	0.2	\$725.00	\$145.00	Review email between RP and SC
04/09/20	SC	LA	2.5	\$240.00	\$600.00	Work on opting plaintiffs out of Hakeem settlement
04/15/20	MA	CC	1.8	\$725.00	\$1,305.00	Draft 26(f) report, email to opposing counsel
04/15/20	SC	LA	0.3	\$240.00	\$72.00	Discussion re opt out project
04/15/20	DMH	CC	0.3	\$725.00	\$217.50	Discussion re opt out project
04/15/20	TM	LA	0.3	\$240.00	\$72.00	Discussion re opt out project
04/15/20	SC	LA	0.2	\$240.00	\$48.00	Status update re opt out progress
04/15/20	MA	CC	0.1	\$725.00	\$72.50	Review SC email
04/15/20	RP	CC	0.1	\$725.00	\$72.50	Review SC email
04/16/20	MA	CC	8.1	\$725.00	\$5,872.50	Research re Colorado River Doctrine, incorporate in Rsp re Motion for Stay
04/17/20	RP	CC	6.7	\$725.00	\$4,857.50	Additional Research re Draft Memo ISO Mot to Intervene in Hakeem
04/17/20	MA	CC	4.5	\$725.00	\$3,262.50	Draft Rsp to Motion for Stay
04/18/20	MA	CC	4.2	\$725.00	\$3,045.00	Work on Rsp in Opp to Mot to Compel Arbitration
04/18/20	MA	CC	3.6	\$725.00	\$2,610.00	Revise Rsp to Motion for Stay
04/19/20	MA	CC	6.7	\$725.00	\$4,857.50	Continue work on Rsp to Motion for Stay
04/20/20	MA	CC	0.1	\$725.00	\$72.50	Follow up email re 26(f) Report
04/20/20	MA	CC	0.2	\$725.00	\$145.00	Review opposing counsel revisions
04/20/20	MA	CC	0.1	\$725.00	\$72.50	Respond to opposing counsel email re 26(f) Report
04/20/20	MA	CC	0.3	\$725.00	\$217.50	Final review, approve 26(f) Report for filing
04/20/20	SC	LA	0.1	\$240.00	\$24.00	File 26(f) Report
04/20/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 90, 26(f) Report
04/20/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 90, 26(f) Report, save to file
04/20/20	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 90, 26(f) Report
04/20/20	MA	CC	3.1	\$725.00	\$2,247.50	Work on Rsp to Motion for Stay, email to RP
04/20/20	MA	CC	2.2	\$725.00	\$1,595.00	Work on Evidentiary Objections to Declarations IOT Def's Mot to Compel Arb

EXHIBIT 9

April 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/20/20	RP	CC	2.5	\$725.00	\$1,812.50	Review, edit, revise MA draft Rsp re Mot for Stay
04/20/20	RP	CC	4.2	\$725.00	\$3,045.00	Work on Draft Memo ISO Mot to Intervene in Hakeem
04/21/20	RP	CC	9.6	\$725.00	\$6,960.00	Finish Draft Memo ISO Mot to Intervene in Hakeem
04/21/20	SC	LA	1.8	\$240.00	\$432.00	Work on Draft Memo ISO Mot to Intervene in Hakeem
04/21/20	SC	LA	0.5	\$240.00	\$120.00	Work on Letter to CPT re opting plaintiffs out of Hakeem settlement
04/21/20	SC	LA	0.8	\$240.00	\$192.00	Research and work on PHV for RP in Hakeem
04/21/20	MA	CC	9.1	\$725.00	\$6,597.50	Work on Resp re Motions to Compel Arbitration
04/22/20	RP	CC	0.1	\$725.00	\$72.50	Review notice of hearing, email staff instructions re resetting hearing
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Review RP email re notice of hearing
04/22/20	MA	CC	0.1	\$725.00	\$72.50	Review RP email re notice of hearing
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Email MA re resetting hearing, procedures
04/22/20	MA	CC	0.1	\$725.00	\$72.50	Review and respond to SC email
04/22/20	RP	CC	0.1	\$725.00	\$72.50	Review emails between MA and SC
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Further questions re resetting hearing
04/22/20	MA	CC	0.1	\$725.00	\$72.50	Review and respond to SC email
04/22/20	RP	CC	0.1	\$725.00	\$72.50	Review MA response
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Review MA response
04/22/20	SC	LA	0.3	\$240.00	\$72.00	Draft proof of service for review
04/22/20	MA	CC	0.2	\$725.00	\$145.00	Review and revise proof of service, approve for filing with Mot to Intervene
04/22/20	SC	LA	0.3	\$240.00	\$72.00	Finish Letter to CPT, forward to MA and RP for review
04/22/20	RP	CC	0.2	\$725.00	\$145.00	Review and approve Letter to CPT re opt out
04/22/20	RP	CC	6	\$725.00	\$4,350.00	Finish Memo ISO Mot to Intervene for SC edits to TOA, TOC
04/22/20	MA	CC	0.5	\$725.00	\$362.50	Review court rules, forward to co-counsel, instructions re setting hearing
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Review MA email
04/22/20	RP	CC	0.5	\$725.00	\$362.50	Draft Motion and proposed order re Mot to Intervene
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Respond to RP email re setting hearing
04/22/20	MA	CC	10.2	\$725.00	\$7,395.00	Finish Briefs re Resp in Opp to Motion to Stay, Evidentiary Objections, and re Arbitration
04/22/20	RP	CC	2.1	\$725.00	\$1,522.50	Final review and revisions of Mot to Intervene, approve for filing
04/22/20	RP	CC	4.1	\$725.00	\$2,972.50	Work on Exhibits re Mot to Intervene
04/22/20	SC	LA	0.5	\$240.00	\$120.00	Requested edits to MA briefing, exhibits, tables
04/22/20	MA	CC	1.2	\$725.00	\$870.00	Final review and revisions of Opp to Mot for Stay
04/22/20	SC	LA	0.3	\$240.00	\$72.00	File Opp to Mot for Stay, email PO to Court
04/22/20	MA	CC	0.2	\$725.00	\$145.00	Review filing ECF No. 91, review submission of PO
04/22/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 91, Opp to Mot to Stay
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 91, Opp to Mot to Stay, save to file
04/22/20	SC	LA	0.2	\$240.00	\$48.00	File Opp to Mots to Compel Arb, email PO to Court

EXHIBIT 9

April 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/22/20	MA	CC	0.1	\$725.00	\$72.50	Review filing ECF No. 92, Resp in Opp to Mots to Compel Arb
04/22/20	RP	CC	0.1	\$725.00	\$72.50	Review filing ECF No. 92, Resp in Opp to Mots to Compel Arb
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Review filing ECF No. 92, Resp in Opp to Mots to Compel Arb, save to file
04/22/20	SC	LA	0.2	\$240.00	\$48.00	File Evidentiary Objs re Mots to Compel Arb
04/22/20	MA	CC	0.1	\$725.00	\$72.50	Review filing ECF No. 93, Evidentiary Objections
04/22/20	RP	CC	0.1	\$725.00	\$72.50	Review filing ECF No. 93, Evidentiary Objections
04/22/20	SC	LA	0.1	\$240.00	\$24.00	Review filing ECF No. 93, Evidentiary Objections, save to file
04/23/20	RP	CC	0.5	\$725.00	\$362.50	Review SC final draft of Mot to Intervene, instructions re send to CPT
04/23/20	RP	CC	0.5	\$725.00	\$362.50	Work on status report
04/23/20	RP	CC	0.1	\$725.00	\$72.50	Instructions to staff re alert when filed
04/23/20	SC	LA	0.1	\$240.00	\$24.00	Review and respond to RP email
04/23/20	MA	CC	0.1	\$725.00	\$72.50	Review email btw SC and RP
04/23/20	SC	LA	0.2	\$240.00	\$48.00	Instructions to vendor re filing Mot to Intervene
04/23/20	RP	CC	0.1	\$725.00	\$72.50	Pass status report to MA
04/23/20	MA	CC	0.7	\$725.00	\$507.50	Draft status report, email to RP for review
04/23/20	MA	CC	0.1	\$725.00	\$72.50	Review email from vendor re filing Mot to Intervene
04/23/20	SC	LA	0.1	\$240.00	\$24.00	Review email from vendor re filing Mot to Intervene
04/23/20	RP	CC	0.1	\$725.00	\$72.50	Review and respond to email from vendor re filing Mot to Intervene
04/23/20	RP	CC	0.1	\$725.00	\$72.50	Review MA draft status report
04/23/20	SC	LA	0.1	\$700.00	\$70.00	Further communication with vendor re filing
04/23/20	MA	CC	0.1	\$725.00	\$72.50	Small revision to status report, instructions to staff to file
04/23/20	MA	CC	0.2	\$725.00	\$145.00	Various emails re filing status report, mailing Hakeem motion to CPT
04/23/20	SC	LA	0.2	\$240.00	\$48.00	Various emails re filing status report, mailing Hakeem motion to CPT
04/23/20	RP	CC	0.2	\$725.00	\$145.00	Various emails re filing status report, mailing Hakeem motion to CPT
04/23/20	SC	LA	0.2	\$240.00	\$48.00	File status report
04/23/20	MA	CC	0.1	\$725.00	\$72.50	Review email from vendor re service
04/23/20	SC	LA	0.1	\$240.00	\$24.00	Review email from vendor re service
04/23/20	RP	CC	0.2	\$725.00	\$145.00	Review and respond to email from vendor re service
04/23/20	SC	LA	0.4	\$700.00	\$280.00	Work on mailing to CPT
04/23/20	MA	CC	0.1	\$725.00	\$72.50	Review filing, ECF No. 94, status report
04/23/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 94, Status Report
04/23/20	SC	LA	0.4	\$700.00	\$280.00	Further communications with vendor re service
04/24/20	MA	CC	0.1	\$725.00	\$72.50	Review email from local counsel
04/24/20	RP	CC	0.1	\$725.00	\$72.50	Review email from local counsel
04/24/20	MA	CC	0.3	\$725.00	\$217.50	Draft and file correction re status report
04/24/20	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 95, Clarification re status report

EXHIBIT 9

April 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/24/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 95, Clarification re status report
04/24/20	RP	CC	0.4	\$725.00	\$290.00	Draft email to GD re case status
04/24/20	MA	CC	0.1	\$725.00	\$72.50	Review RP email re case status
04/24/20	SC	LA	0.2	\$240.00	\$48.00	Review email from Sacramento court and forward to MA, RP
04/24/20	MA	CC	0.1	\$725.00	\$72.50	review and respond to SC email
04/24/20	RP	CC	0.1	\$725.00	\$72.50	review SC email
04/24/20	SC	LA	0.2	\$700.00	\$140.00	Draft service email, send to MA, RP for review
04/24/20	RP	CC	0.1	\$725.00	\$72.50	Respond to SC email
04/27/20	MA	CC	10.1	\$725.00	\$7,322.50	Work on Reply ISO Mot for Condl Cert
04/27/20	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 96, notice of deficiencies re 95
04/27/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 96, notice of deficiencies re 95
04/28/20	MA	CC	8.5	\$725.00	\$6,162.50	Work on Reply ISO Mot for Condl Cert
04/29/20	MA	CC	5.8	\$725.00	\$4,205.00	Finish Draft Reply ISO Mot for Condl Cert
04/29/20	SC	LA	0.5	\$240.00	\$120.00	Run TOA re Reply ISO Mot for Condl Cert
04/29/20	RP	CC	0.4	\$725.00	\$290.00	Review Reply ISO Mot for Condl Cert, revisions
04/29/20	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 97, Order vacating scheduling conference
04/29/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 97, Order vacating scheduling conference
04/29/20	SC	LA	0.2	\$240.00	\$48.00	Review ECF No. 97, Order vacating scheduling conference, update calendar
04/29/20	MA	CC	0.4	\$725.00	\$290.00	Review ECF No. 99, Def's Reply ISO Mot to Compel Moore, Grant
04/29/20	RP	CC	0.3	\$725.00	\$217.50	Review ECF No. 99, Def's Reply ISO Mot to Compel Moore, Grant
04/29/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 99, save to file
04/29/20	MA	CC	0.3	\$725.00	\$217.50	Review ECF No. 100, Reply ISO Arb Grant, Moses
04/29/20	RP	CC	0.2	\$725.00	\$145.00	Review ECF No. 100, Reply ISO Arb Grant, Moses, note typo in footer
04/29/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 100, save to file
04/29/20	MA	CC	1.4	\$725.00	\$1,015.00	Review ECF No. 101, Reply ISO remaining Mots to Compel Arb
04/29/20	RP	CC	1	\$725.00	\$725.00	Review ECF No. 101, Reply ISO remaining Mots to Compel Arb
04/29/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 101, save to file
04/29/20	SC	LA	0.2	\$240.00	\$48.00	File Reply ISO Motion to Certify FLSA Collective Action
04/29/20	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 102, Mot to Certify Collective
04/29/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 102, Mot to Certify Collective
04/29/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 102, Mot to Certify Collective, save to file
04/29/20	MA	CC	0.2	\$725.00	\$145.00	Brief case strategy discussion
04/29/20	RP	CC	0.2	\$725.00	\$145.00	Brief case strategy discussion
04/30/20	RP	CC	0.5	\$725.00	\$362.50	Legal Research re late filed declaration
04/30/20	MA	CC	1.1	\$725.00	\$797.50	Draft Objection to Untimely Declaration Hearn
04/30/20	RP	CC	0.3	\$725.00	\$217.50	Review draft Objection, send additional authority

EXHIBIT 9

April 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/30/20	SC	LA	0.1	\$240.00	\$24.00	File Objection to Untimely Declaration Hearn
04/30/20	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 103, Objection to Untimely Declaration Hearn
04/30/20	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 103, Objection to Untimely Declaration Hearn
04/30/20	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 103, Objection to Untimely Declaration Hearn, save to file
04/30/20	SC	LA	0.3	\$240.00	\$72.00	Various questions to RP re Opt out
04/30/20	RP	CC	0.2	\$725.00	\$145.00	Respond to SC emails
04/30/20	MA	CC	0.2	\$725.00	\$145.00	Review and respond to emails between RP and SC
						\$103,952.00

May 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
5/1/2020	SC	LA	0.1	\$240.00	\$24.00	Email RP, MA re opt-out forms mailed to opposing counsel
5/1/2020	SC	LA	0.2	\$240.00	\$48.00	Email opposing counsel opt-out forms
5/1/2020	MA	CC	0.2	\$725.00	\$145.00	Review ECF No.104, Scheduling Order
5/1/2020	RP	CC	0.2	\$725.00	\$145.00	Review ECF No.104, Scheduling Order
5/1/2020	SC	LA	0.6	\$240.00	\$144.00	Review ECF No.104, Scheduling Order, calendar, save to file
5/1/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 105, Referral to Mediation
5/1/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 105, Referral to Mediation
5/1/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 105, Referral to Mediation, save to file
5/1/2020	MA	CC	0.1	\$725.00	\$72.50	Brief case strategy discussion
5/1/2020	RP	CC	0.1	\$725.00	\$72.50	Brief case strategy discussion
5/6/2020	MA	CC	0.5	\$725.00	\$362.50	Draft email to opposing counsel re early resolution
5/6/2020	RP	CC	0.2	\$725.00	\$145.00	Review and edit MA draft email
5/6/2020	MA	CC	0.1	\$725.00	\$72.50	Email opposing counsel re early resolution
5/6/2020	DMH	CC	0.2	\$725.00	\$145.00	Review and respond to MA email
5/6/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
5/7/2020	SC	LA	0.1	\$240.00	\$24.00	Forward email from vendor re filing to RP, MA
5/7/2020	RP	CC	0.1	\$725.00	\$72.50	Review SC email, question re calendaring
5/7/2020	MA	CC	0.1	\$725.00	\$72.50	Review SC email
5/7/2020	SC	LA	0.3	\$240.00	\$72.00	Review court website respond to RP email question
5/14/2020	MA	CC	0.1	\$725.00	\$72.50	Leave voicemail with opposing counsel re upcoming hearing
5/15/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re upcoming hearing
5/15/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from OC re upcoming hearing
5/15/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to email from OC re upcoming hearing
5/15/2020	MA	CC	0.2	\$725.00	\$145.00	Call with opposing counsel re upcoming hearing
5/15/2020	MA	CC	3.2	\$725.00	\$2,320.00	Hearing prep
5/15/2020	RP	CC	1.1	\$725.00	\$797.50	Review Court Order re Condl Cert, Mot to Stay, Mot to Compel Arb
5/15/2020	MA	CC	1.5	\$725.00	\$1,087.50	Review Court Order re Condl Cert, Mot to Stay, Mot to Compel Arb
5/15/2020	RP	CC	0.5	\$725.00	\$362.50	Draft email to TS, ML re Order in Allied
5/15/2020	TS	SC	0.3	\$950.00	\$285.00	Review RP email and court order
5/15/2020	ML	SC	0.3	\$950.00	\$285.00	Review RP email and court order
5/15/2020	MA	CC	0.5	\$725.00	\$362.50	Prep notice of ruling for filing in Hakeem, email to RP
5/15/2020	RP	CC	0.2	\$725.00	\$145.00	Review filing
5/15/2020	SC	LA	0.3	\$240.00	\$72.00	Work on service documents, proof read, send for filing

EXHIBIT 9

May 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
5/15/2020	MA	CC	0.2	\$725.00	\$145.00	Respond to media inquiry re Allied
5/15/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re filing, new vendor, filing procedures
5/15/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails re filing, new vendor, filing procedures
5/15/2020	SC	LA	0.3	\$240.00	\$72.00	Various emails re filing, new vendor, filing procedures
5/15/2020	SC	LA	0.5	\$240.00	\$120.00	Work on obtaining documents in Hakeem, update file
5/15/2020	DMH	CC	1.1	\$725.00	\$797.50	Review Order granting cert, email MA
5/15/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to DMH email
5/15/2020	JF	CC	1.2	\$725.00	\$870.00	Review Order granting cert, email MA
5/15/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to JF email
5/18/2020	SC	LA	0.8	\$240.00	\$192.00	Draft Notice of filing consent, organize documents, file
5/18/2020	MA	CC	0.2	\$725.00	\$145.00	Review and approve notice for filing
5/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 107, notice of filing consent
5/18/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 107, notice of filing consent
5/18/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 107, notice of filing consent, save
5/18/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails re notice process
5/18/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re notice process
5/18/2020	SC	LA	0.3	\$240.00	\$72.00	Various emails re notice process
5/19/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails re June 8 hearing
5/19/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails re June 8 hearing
5/19/2020	SC	LA	0.4	\$240.00	\$96.00	Various emails re June 8 hearing, speak with clerk
5/22/2020	MA	CC	0.2	\$725.00	\$145.00	Draft further email to opposing counsel, following up re settlement
5/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel re mediation
5/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review emails between MA and OC re mediation
5/22/2020	MA	CC	0.1	\$725.00	\$72.50	Forward email from opposing counsel to TS
5/22/2020	TS	SC	0.1	\$950.00	\$95.00	Review email re mediation and respond
5/22/2020	SC	LA	0.5	\$240.00	\$120.00	Case strategy conference re notice period
5/22/2020	RP	CC	0.5	\$725.00	\$362.50	Case strategy conference re notice period
5/22/2020	MA	CC	0.5	\$725.00	\$362.50	Case strategy conference re notice period
5/22/2020	MA	CC	0.1	\$725.00	\$72.50	Email notice forms to SC
5/22/2020	SC	LA	0.3	\$240.00	\$72.00	Review notice forms
5/24/2020	MA	CC	0.6	\$725.00	\$435.00	Discuss mediation
5/24/2020	RP	CC	0.6	\$725.00	\$435.00	Discuss mediation
5/26/2020	MA	CC	0.4	\$725.00	\$290.00	Draft email response to OC email re mediation, recommend Chuck Stohler

EXHIBIT 9

May 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
5/26/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails to mediators requesting availability
5/27/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from SC re filing rejected in Hakeem
5/27/2020	SC	LA	0.1	\$240.00	\$24.00	Email MA, RP re filing rejected in Hakeem
5/27/2020	RP	CC	0.1	\$725.00	\$72.50	Review and respond to email from SC re filing rejected in Hakeem
5/28/2020	SC	LA	0.5	\$240.00	\$120.00	Research issue with presiding judge
5/28/2020	MA	CC	0.4	\$725.00	\$290.00	Various communications re issue with filing, refiling
5/28/2020	SC	LA	0.4	\$240.00	\$96.00	Various communications re issue with filing, refiling
5/28/2020	RP	CC	0.4	\$725.00	\$290.00	Various communications re issue with filing, refiling
5/28/2020	SC	LA	0.6	\$240.00	\$144.00	Speak with various clerks re hearing
5/28/2020	SC	LA	0.3	\$240.00	\$72.00	Revise filings for proper department
5/28/2020	MA	CC	0.2	\$725.00	\$145.00	Review and approve for refiling
5/28/2020	SC	LA	0.1	\$240.00	\$24.00	Send for filing
5/28/2020	MA	CC	0.5	\$725.00	\$362.50	Additional research, request revisions from SC
5/28/2020	SC	LA	0.3	\$240.00	\$72.00	Additional revisions, send revised version for filing
5/29/2020	MA	CC	0.1	\$725.00	\$72.50	Follow up email to opposing counsel re class list deadline
5/29/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel attaching class list, confirm not received
5/29/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel attaching class list, no attach
5/29/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel attaching class list, no attach
5/29/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from opposing counsel attaching class list, no attach
5/29/2020	SC	LA	0.3	\$240.00	\$72.00	Draft notice of filing consent form, redact consent form
5/29/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 108, notice of filing consent form
5/29/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 108, notice of filing consent form
5/29/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 108, notice of filing consent form, save to file
5/29/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from Carol Philip sending class list
						\$17,229.00

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/2/2022	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from mediator re possible mediation
6/2/2022	SC	LA	0.1	\$240.00	\$24.00	Follow up email re class list
6/2/2022	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
6/2/2022	SC	LA	0.1	\$240.00	\$24.00	Request quote from Rust
6/2/2022	SC	LA	0.1	\$240.00	\$24.00	Request quote from CPT
6/2/2022	SC	LA	0.2	\$240.00	\$48.00	Request quote from Phoenix re claim administration, forward response to MA, RP
6/2/2022	SC	LA	0.4	\$240.00	\$96.00	Work on PHV forms for RP in Hakeem
6/2/2022	MA	CC	0.1	\$725.00	\$72.50	Review SC email re claim administration
6/2/2022	RP	CC	0.1	\$725.00	\$72.50	Review SC email re claim administration
6/2/2022	MA	CC	0.2	\$725.00	\$145.00	Draft and send email to OC re whether to mediate before incurring cost of notice
6/2/2022	RP	CC	0.1	\$725.00	\$72.50	Email to SC re edit to PHV
6/2/2022	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
6/2/2022	SC	LA	0.2	\$240.00	\$48.00	Call Sacramento clerk, email RP MA re filing requirements
6/2/2022	MA	CC	0.1	\$725.00	\$72.50	Review SC email
6/2/2022	RP	CC	0.1	\$725.00	\$72.50	Review SC email
6/2/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from OC requesting call re mediation
6/2/2020	SC	LA	0.2	\$240.00	\$48.00	Review Hakeem Docket, email to RP, MA
6/2/2020	MA	CC	0.1	\$725.00	\$72.50	Review filing, requesting hearing be reset
6/2/2020	RP	CC	0.1	\$725.00	\$72.50	Review filing, requesting hearing be reset
6/2/2020	MA	CC	0.5	\$725.00	\$362.50	Case strategy discussion
6/2/2020	RP	CC	0.5	\$725.00	\$362.50	Case strategy discussion
6/2/2020	SC	LA	0.1	\$240.00	\$24.00	Forward CPT quote
6/2/2020	MA	CC	0.1	\$725.00	\$72.50	Review SC email
6/2/2020	RP	CC	0.1	\$725.00	\$72.50	Review SC email
6/3/2020	MA	CC	0.6	\$725.00	\$435.00	Prep and attend call with OC re notice issues, mediation
6/3/2020	MA	CC	0.5	\$725.00	\$362.50	Call with Rust re claims administration, request quote
6/3/2020	SC	LA	0.2	\$240.00	\$48.00	Email MA re procedural question
6/3/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
6/4/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails re filings in Hakeem
6/4/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails re filings in Hakeem
6/4/2020	MA	CC	1.9	\$725.00	\$1,377.50	Draft and send email to OC attaching ex parte mot for ext re notice
6/4/2020	SC	LA	0.2	\$240.00	\$48.00	File ex parte application re notice, email proposed order to court
6/4/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 109, Ex Parte
6/4/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 109, Ex Parte

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/4/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 109, Ex Parte, save to file
6/5/2020	MA	CC	1.2	\$725.00	\$870.00	Review Hakeem Mot for Final Approval
6/5/2020	TS	SC	0.1	\$950.00	\$95.00	Email MA re status on mediation
6/5/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to TS email
6/5/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 114, 115 Memo and Objections to Ex Parte App
6/5/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 114, 115 Memo and Objections to Ex Parte App
6/5/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF Nos. 114, 115 Memo and Objections to Ex Parte App, save to file
6/5/2020	MA	CC	0.6	\$725.00	\$435.00	Further review oppo to ex parte
6/5/2020	RP	CC	0.8	\$725.00	\$580.00	Further review oppo to ex parte
6/5/2020	MA	CC	0.5	\$725.00	\$362.50	Case strategy discussion
6/5/2020	RP	CC	0.5	\$725.00	\$362.50	Case strategy discussion
6/8/2020	MA	CC	2.5	\$725.00	\$1,812.50	Review and discuss Pl's Oppo to Mot to Intervene in Hakeem
6/8/2020	RP	CC	2.5	\$725.00	\$1,812.50	Review and discuss Pl's Oppo to Mot to Intervene in Hakeem
6/8/2020	MA	CC	0.1	\$725.00	\$72.50	Request CPT quote
6/8/2020	SC	LA	0.1	\$240.00	\$24.00	Forward CPT quote
6/8/2020	MA	CC	0.6	\$725.00	\$435.00	Discuss quote with CPT rep
6/8/2020	SC	LA	0.1	\$240.00	\$24.00	Follow up email with Rust re quote for claim administration
6/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review emails re estimate
6/8/2020	SC	LA	0.1	\$240.00	\$24.00	Review emails re estimate, respond
6/8/2020	SC	LA	0.4	\$240.00	\$96.00	Conversation with CPT rep, email MA, RP
6/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review SC email
6/8/2020	RP	CC	0.1	\$725.00	\$72.50	Review SC email
6/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from Rust re quote
6/8/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from Rust re quote
6/8/2020	RP	CC	0.1	\$725.00	\$72.50	Review email serving Def's Oppo to Mot to Int, instructions to SC
6/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review email serving Def's Oppo to Mot to Int
6/8/2020	SC	LA	0.1	\$240.00	\$24.00	Review email serving Def's Oppo to Mot to Int, save to file
6/9/2020	RP	CC	4.5	\$725.00	\$3,262.50	Review and discuss Def's Oppo to Mot to Int, begin prep for reply/hearing
6/9/2020	MA	CC	4.5	\$725.00	\$3,262.50	Review and discuss Def's Oppo to Mot to Int, begin prep for reply/hearing
6/9/2020	MA	CC	0.3	\$725.00	\$217.50	Discussion re procedure w/r/t ex parte app
6/9/2020	SC	LA	0.3	\$240.00	\$72.00	Discussion re procedure w/r/t ex parte app
6/9/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from CPT re quote
6/9/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from CPT re quote
6/9/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from CPT re quote

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/10/2020	SC	LA	0.5	\$240.00	\$120.00	Email RP re court reporter, set up court reporter
6/10/2020	RP	CC	0.1	\$725.00	\$72.50	Respond to SC email
6/10/2020	SC	LA	0.1	\$240.00	\$24.00	Review and send email to RP and MA re PHV rejected
6/10/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
6/10/2020	MA	CC	2.5	\$725.00	\$1,812.50	Research for RP re intervention
6/10/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 112, Order Granting Ex Parte
6/10/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 112, Order Granting Ex Parte
6/10/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 112, Order Granting Ex Parte, save to file
6/10/2020	MA	CC	0.3	\$725.00	\$217.50	Draft email re amending complaint, meet and confer
6/10/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
6/10/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email
6/10/2020	DMH	CC	0.1	\$725.00	\$72.50	Review MA email
6/10/2020	SC	LA	0.1	\$240.00	\$24.00	Review MA email
6/11/2020	RP	CC	9.2	\$725.00	\$6,670.00	Work on Reply ISO intervention
6/11/2020	SC	LA	0.4	\$240.00	\$96.00	Refile PHV
6/11/2020	TS	SC	0.1	\$950.00	\$95.00	Request "blurb" re case
6/11/2020	MA	CC	0.5	\$725.00	\$362.50	Update TS re case in prep for call with OC
6/11/2020	TS	SC	0.5	\$950.00	\$475.00	Discussion re claims admin, TS case strategy
6/11/2020	MA	CC	0.5	\$725.00	\$362.50	Discussion re claims admin, TS case strategy
6/11/2020	SC	LA	0.4	\$240.00	\$96.00	Work on RP PHV, forward to vendor
6/12/2020	MA	CC	5.2	\$725.00	\$3,770.00	Review and Revise RP draft Reply
6/12/2020	RP	CC	0.5	\$725.00	\$362.50	Final review Reply, approve for filing
6/12/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails re filings in Hakeem
6/12/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails re filings in Hakeem
6/12/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails re filings in Hakeem
6/12/2020	SC	LA	0.5	\$240.00	\$120.00	Email RP and MA re service, work on POS and service
6/12/2020	MA	CC	0.1	\$725.00	\$72.50	Email CPT representative to discuss quote
6/12/2020	MA	CC	0.2	\$725.00	\$145.00	Email Phoenix representative to discuss quote, review email, set conf
6/12/2020	MA	CC	0.2	\$725.00	\$145.00	Emails re claims administration process
6/12/2020	SC	LA	0.2	\$240.00	\$48.00	Emails re claims administration process
6/12/2020	SC	LA	0.1	\$240.00	\$24.00	Question re when to file arbitrations
6/12/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
6/14/2020	MA	CC	0.6	\$725.00	\$435.00	Discuss quote with CPT rep
6/14/2020	RP	CC	0.6	\$725.00	\$435.00	Discuss quote with CPT rep

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/14/2020	TS	SC	0.6	\$950.00	\$570.00	Discuss quote with CPT rep
6/14/2020	MA	CC	0.5	\$725.00	\$362.50	Discuss quote with Phoenix rep
6/14/2020	RP	CC	0.5	\$725.00	\$362.50	Discuss quote with Phoenix rep
6/14/2020	TS	SC	0.5	\$950.00	\$475.00	Discuss quote with Phoenix rep
6/15/2020	MA	CC	0.3	\$725.00	\$217.50	Draft email to TS re case status
6/15/2020	TS	SC	0.7	\$950.00	\$665.00	Prep and attend call with OC re potential settlement
6/15/2020	MA	CC	0.2	\$725.00	\$145.00	Review various emails from CPT re follow up and mock ups
6/15/2020	RP	CC	0.2	\$725.00	\$145.00	Review various emails from CPT re follow up and mock ups
6/15/2020	MA	CC	0.2	\$725.00	\$145.00	Review revised quotes
6/15/2020	RP	CC	0.2	\$725.00	\$145.00	Review revised quotes
6/16/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to email from OC requesting service docs
6/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from OC requesting service docs
6/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC requesting service docs
6/16/2020	TS	SC	0.7	\$950.00	\$665.00	Various calls and emails negotiating claims administrator rates
6/16/2020	RP	CC	0.7	\$725.00	\$507.50	Various calls and emails negotiating claims administrator rates
6/16/2020	MA	CC	0.7	\$725.00	\$507.50	Various calls and emails negotiating claims administrator rates
6/16/2020	MA	CC	1.1	\$725.00	\$797.50	Draft joint stipulation re extend notice deadline, send to TS
6/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review email re joint stipulation
6/16/2020	TS	CC	0.2	\$950.00	\$190.00	Review email re joint stipulation and filing
6/16/2020	TS	CC	0.1	\$950.00	\$95.00	Email stipulation to OC, review response
6/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review redlines to stipulation
6/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review redlines to stipulation
6/16/2020	TS	SC	0.1	\$950.00	\$95.00	Email OC re stipulation edits acceptable
6/16/2020	SC	LA	0.2	\$240.00	\$48.00	File stipulation, submit proposed order
6/17/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails re hearing in Hakeem, tentative
6/17/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails re hearing in Hakeem, tentative
6/17/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails re hearing in Hakeem, tentative
6/17/2020	MA	CC	0.4	\$725.00	\$290.00	Coordinate with Phoenix re service to collective
6/17/2020	RP	CC	1.2	\$725.00	\$870.00	Review order granting intervention, forward to co-counsel
6/17/2020	MA	CC	0.5	\$725.00	\$362.50	Review order granting intervention
6/17/2020	TS	SC	0.3	\$950.00	\$285.00	Review order granting intervention
6/17/2020	MA	CC	0.4	\$725.00	\$290.00	Various emails negotiating cost of claims admin with Phoenix
6/17/2020	MA	CC	0.1	\$725.00	\$72.50	Follow up email with OC re motion for leave to amend
6/17/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/17/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
6/17/2020	DMH	CC	0.1	\$725.00	\$72.50	Review MA email
6/17/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 114, Order granting stipulation
6/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 114, Order granting stipulation
6/17/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 114, Order granting stipulation, save to file
6/17/2020	TS	SC	0.1	\$950.00	\$95.00	Review and respond to OC email re Motion for leave to amend
6/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review OC email re Motion for leave to amend
6/17/2020	TS	SC	0.4	\$950.00	\$380.00	Discussion re claims administrator
6/17/2020	MA	CC	0.4	\$725.00	\$290.00	Discussion re claims administrator, email to Phoenix rep
6/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from Phoenix rep, respond attaching order and notice
6/17/2020	MA	CC	0.6	\$725.00	\$435.00	Various emails and work with Phoenix re issuing notice
6/17/2020	SC	LA	0.6	\$240.00	\$144.00	Various emails and work with Phoenix re issuing notice
6/18/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC, forward to MA requesting Am Compl
6/18/2020	MA	CC	0.3	\$725.00	\$217.50	Finalize Am Compl, send to TS
6/18/2020	MA	CC	1.1	\$725.00	\$797.50	Review and revise contract with Phoenix re notice
6/18/2020	TS	SC	0.3	\$950.00	\$285.00	Review Phoenix contract
6/18/2020	TS	SC	0.1	\$950.00	\$95.00	Email OC Am Compl
6/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from TS to OC re Am Compl
6/18/2020	MA	CC	0.5	\$725.00	\$362.50	Work with Phoenix on notice
6/18/2020	SC	LA	1.1	\$240.00	\$264.00	Work with Phoenix on notice
6/19/2020	RP	CC	2.1	\$725.00	\$1,522.50	Review amended motion for final approval, case strategy
6/19/2020	MA	CC	1.2	\$725.00	\$870.00	Review amended motion for final approval, case strategy
6/19/2020	SC	LA	0.2	\$240.00	\$48.00	Obtain and forward minute order in Hakeem to RP, MA
6/19/2020	RP	CC	0.2	\$725.00	\$145.00	Review minute order
6/19/2020	MA	CC	0.2	\$725.00	\$145.00	Review minute order
6/19/2020	MA	CC	0.9	\$725.00	\$652.50	Work with Phoenix on notice
6/19/2020	TS	SC	0.1	\$950.00	\$95.00	Execute service agreement with Phoenix
6/19/2020	TS	SC	0.1	\$950.00	\$95.00	Final confer with OC re Am Compl
6/19/2020	MA	CC	0.1	\$725.00	\$72.50	Review TS email
6/19/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re no opposition, forward to MA
6/19/2020	MA	CC	1.5	\$725.00	\$1,087.50	Work on Stipulation to Amend, email to TS
6/19/2020	TS	SC	0.1	\$950.00	\$95.00	Confer with OC re stipulation
6/19/2020	MA	CC	0.5	\$725.00	\$362.50	Work with Phoenix on notice
6/19/2020	SC	LA	0.4	\$240.00	\$96.00	Work with Phoenix on notice

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/22/2020	SC	LA	0.2	\$240.00	\$48.00	Call re filing complaint in intervention, serving order
6/22/2020	RP	CC	0.2	\$725.00	\$145.00	Call re filing complaint in intervention, serving order
6/22/2020	MA	CC	0.2	\$725.00	\$145.00	Call re filing complaint in intervention, serving order
6/22/2020	RP	CC	0.5	\$725.00	\$362.50	Final review complaint in intervention, send to SC to file
6/22/2020	MA	CC	0.1	\$725.00	\$72.50	Ask TS if OC agrees with stipulation
6/22/2020	TS	SC	0.1	\$950.00	\$95.00	Follow up with OC re stipulation
6/22/2020	MA	CC	0.3	\$725.00	\$217.50	Various communications with Phoenix re updated service agreement
6/22/2020	MA	CC	0.4	\$725.00	\$290.00	Call with Rust representative re going with Phoenix
6/22/2020	MA	CC	0.1	\$725.00	\$72.50	Email to Phoenix re deadline for sending reminder postcard
6/22/2020	MA	CC	0.2	\$725.00	\$145.00	Finalize stipulation re am compl, instructions to staff
6/22/2020	SC	LA	0.1	\$240.00	\$24.00	File stipulation, submit proposed order
6/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 115, stipulation re am compl
6/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 115, stipulation re am compl
6/22/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 115, stipulation re am compl, save to file
6/22/2020	TS	SC	0.4	\$950.00	\$380.00	Work on contract with Phoenix
6/22/2020	MA	CC	0.4	\$725.00	\$290.00	Work on contract with Phoenix
6/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 116, Order granting stipulation
6/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 116, Order granting stipulation
6/22/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 116, Order granting stipulation, save to file
6/22/2020	SC	LA	0.1	\$240.00	\$24.00	File Amended Complaint
6/23/2020	SC	LA	0.8	\$240.00	\$192.00	Discussion re internal procedures for notice
6/23/2020	MA	CC	0.8	\$725.00	\$580.00	Discussion re internal procedures for notice
6/23/2020	RP	CC	0.8	\$725.00	\$580.00	Discussion re internal procedures for notice
6/23/2020	TS	SC	0.8	\$950.00	\$760.00	Discussion re internal procedures for notice
6/23/2020	DH	LA	0.8	\$240.00	\$192.00	Discussion re internal procedures for notice
6/23/2020	MA	CC	0.5	\$725.00	\$362.50	Further work and answer questions re filing complaint in intervention
6/23/2020	SC	LA	0.5	\$240.00	\$120.00	Further work re filing complaint in intervention
6/23/2020	MA	CC	0.1	\$725.00	\$72.50	Discussion re deadline re notice of mailing
6/23/2020	SC	LA	0.1	\$240.00	\$24.00	Discussion re deadline re notice of mailing
6/23/2020	MA	CC	2.5	\$725.00	\$1,812.50	Final work with Phoenix re sending notice
6/23/2020	TS	SC	0.9	\$950.00	\$855.00	Final work with Phoenix re sending notice
6/24/2020	MA	CC	1.2	\$725.00	\$870.00	Research re court procedures
6/24/2020	RP	CC	0.2	\$725.00	\$145.00	Review MA email, further questions
6/24/2020	SC	LA	0.1	\$240.00	\$24.00	Review MA and RP email

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/24/2020	MA	CC	0.5	\$725.00	\$362.50	Additional communication with Phoenix re sending notice
6/24/2020	SC	LA	0.2	\$240.00	\$48.00	Tender proposed order to counsel in Hakeem
6/25/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re order in Hakeem, forward to MA
6/25/2020	MA	CC	0.1	\$725.00	\$72.50	Review TS email
6/26/2020	MA	CC	0.1	\$725.00	\$72.50	Email counsel in Hakeem re order
6/26/2020	MA	CC	1.5	\$725.00	\$1,087.50	Additional preparation for issuance of notice
6/26/2020	SC	LA	2.9	\$240.00	\$696.00	Additional preparation for issuance of notice
6/26/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/26/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/26/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/26/2020	SC	LA	0.4	\$240.00	\$96.00	Receive voicemail and return call from potential client
6/26/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/26/2020	SC	LA	0.1	\$240.00	\$24.00	Gather consent form from alliedinfo inbox
6/26/2020	SC	LA	0.3	\$240.00	\$72.00	Receive voicemail and return call from potential client
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to email from potential client
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to email from potential client
6/27/2020	SC	LA	0.5	\$240.00	\$120.00	Receive voicemail and return call from potential client
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review potential client email, send consent form
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review and escalate potential client email
6/27/2020	MA	CC	0.5	\$725.00	\$362.50	Potential client call
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, leave voicemail to potential client
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review and escalate potential client email
6/27/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to potential client email
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review and respond to potential client email
6/27/2020	SC	LA	0.3	\$240.00	\$72.00	Potential client call
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review potential client email
6/27/2020	SC	LA	0.4	\$240.00	\$96.00	Receive voicemail, return call
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review potential client email, send consent form
6/27/2020	SC	LA	0.6	\$240.00	\$144.00	Receive voicemail, return call
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review potential client email, escalate
6/27/2020	MA	CC	0.2	\$725.00	\$145.00	Respond to potential client email
6/27/2020	SC	LA	0.4	\$240.00	\$96.00	Respond to client voicemail, send consent form
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, garbled could not respond
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review potential client email, escalate

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/27/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to potential client email
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to client email
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review potential client email
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review potential client email and escalate
6/27/2020	MA	CC	0.3	\$725.00	\$217.50	Potential client call
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, leave voicemail to potential client
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review potential client email, send consent form
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Review potential client email, send consent form
6/27/2020	SC	LA	0.3	\$240.00	\$72.00	Review and respond to potential client voicemail
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review potential client email, send PSA ID number
6/27/2020	SC	LA	0.3	\$240.00	\$72.00	Receive voicemail, send consent form
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, unintelligible
6/27/2020	SC	LA	0.7	\$240.00	\$168.00	Receive voicemail, call with potential client
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review potential client email, send PSA ID number
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, call with potential client
6/27/2020	SC	LA	0.4	\$240.00	\$96.00	Receive voicemail, call with potential client
6/27/2020	SC	LA	0.8	\$240.00	\$192.00	Receive voicemail, call with potential client, escalate issue
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review client email, save
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, leave voicemail to potential client
6/27/2020	SC	LA	0.1	\$240.00	\$24.00	Review client email, save
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, note to file
6/27/2020	SC	LA	0.2	\$240.00	\$48.00	Receive client email, send consent form
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review client email, save
6/28/2020	SC	LA	0.2	\$240.00	\$48.00	Receive client voicemail, send consent form
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, leave voicemail to potential client
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Receive potential client voicemail, escalate
6/28/2020	MA	CC	0.3	\$720.00	\$216.00	Potential client call
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, unintelligible
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review email, save
6/28/2020	SC	LA	0.4	\$240.00	\$96.00	Receive voicemail, return call
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, escalate
6/28/2020	MA	CC	0.3	\$720.00	\$216.00	Potential client call
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, escalate

EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/28/2020	MA	CC	0.5	\$720.00	\$360.00	Potential client call
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review and respond to client email
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, return voicemail
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review voicemail, unintelligible
6/28/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review client email, save consent form
6/28/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/28/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/28/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, wrong number
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, unintelligible
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, return call
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, return call
6/29/2020	SC	LA	0.4	\$240.00	\$96.00	Receive voicemail, return call
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, leave voicemail to potential client
6/29/2020	SC	LA	0.3	\$240.00	\$72.00	Receive voicemail, return call
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, no call back required
6/29/2020	SC	LA	0.5	\$240.00	\$120.00	Receive voicemail, return call
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, escalate
6/29/2020	MA	CC	0.3	\$240.00	\$72.00	Potential client call
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Receive voicemail, send consent form
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, leave voicemail to potential client
6/29/2020	SC	LA	0.3	\$240.00	\$72.00	Receive voicemail, return call
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to potential client email
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Receive four voicemails, return call
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, already addressed
6/29/2020	SC	LA	0.3	\$240.00	\$72.00	Receive voicemail, return call, send consent form
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive two additional voicemails, already addressed
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, return voicemail
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, no call back required
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Receive two voicemails, return call
6/29/2020	SC	LA	0.2	\$240.00	\$48.00	Review and respond to two potential client emails
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive email, send consent form
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Receive voicemail, escalate

EXHIBIT 9

June 2020

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EXHIBIT 9

June 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
6/29/2020	DH	LA	0.1	\$240.00	\$24.00	Review client email, send consent form
6/29/2020	DH	LA	0.1	\$240.00	\$24.00	Review client email, send consent form
6/29/2020	DH	LA	0.1	\$240.00	\$24.00	Review client email, send consent form
6/29/2020	DH	LA	0.1	\$240.00	\$24.00	Review client email, send consent form
6/29/2020	DH	LA	0.1	\$240.00	\$24.00	Review client email, send consent form
6/29/2020	MA	CC	0.1	\$725.00	\$72.50	Follow up with Phoenix re execution of contract
6/29/2020	MA	CC	0.6	\$725.00	\$435.00	Draft voicemail for Allied phone box
6/29/2020	MA	CC	1.2	\$725.00	\$870.00	Draft notice of transmission, instructions to SC to file
6/29/2020	MA	CC	1.8	\$725.00	\$1,305.00	Further communications with Phoenix coordinating notice
6/29/2020	SC	LA	2.2	\$240.00	\$528.00	Further communications with Phoenix coordinating notice
6/29/2020	MA	CC	0.2	\$725.00	\$145.00	Review proposed order and instructions to staff to file in Hakeem
6/29/2020	SC	LA	0.4	\$240.00	\$96.00	Work to get proposed order filed and served in Hakeem
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	File notice of transmission
6/29/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 118, Notice of Transmission
6/29/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 118, Notice of Transmission
6/29/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 118, Notice of Transmission, save to file
\$77,228.00						

2020 Q3, Q4 Billing Summary \$557,562.50

July 2020	
Brittany Meyn (BM)	\$2,880.00
Danielle Hopkins (DH)	\$17,376.00
David Matthew Haynie (DMH)	\$1,015.00
Emy Cook (EC)	\$12,000.00
Melinda Arbuckle (MA)	\$43,234.00
Ricardo Prieto (RP)	\$7,854.00
Susan Cavanaugh (SC)	\$34,944.00
Trena Mack (TM)	\$36,044.00
Todd Slobin (TS)	\$1,050.00
Yeneby Angeles (YA)	\$23,064.00
	\$179,461.00

August 2020	
Brittany Meyn (BM)	\$2,400.00
Danielle Hopkins (DH)	\$10,776.00
David Matthew Haynie (DMH)	\$290.00
Jesse "Jay" Forester (JF)	\$72.50
Leticia Salazar (LS)	\$480.00
Melinda Arbuckle (MA)	\$30,876.00
Ricardo Prieto (RP)	\$5,465.00
Susan Cavanaugh (SC)	\$16,132.00
Trena Mack (TM)	\$10,080.00
Todd Slobin (TS)	\$3,515.00
Yeneby Angeles (YA)	\$8,376.00
	\$88,462.50

September 2020	
Andrea Rios Willingham (ARW)	\$2,664.00
Brittany Meyn (BM)	\$624.00
Colin Elliott (CE)	\$1,608.00
Danielle Hopkins (DH)	\$13,440.00
David Matthew Haynie (DMH)	\$362.50
Melinda Arbuckle (MA)	\$39,557.50
Ricardo Prieto (RP)	\$10,730.00
Susan Cavanaugh (SC)	\$22,341.50
Trena Mack (TM)	\$14,208.00
Todd Slobin (TS)	\$6,460.00
Yeneby Angeles (YA)	\$7,248.00
	\$119,243.50

October 2020	
Colin Elliott (CE)	\$1,128.00
David Matthew Haynie (DMH)	\$72.50
Jesse "Jay" Forester (JF)	\$72.50

Melinda Arbuckle (MA)	\$68,077.50
Meredith Mathews Black (MMB)	\$45.00
Ricardo Prieto (RP)	\$15,080.00
Susan Cavanaugh (SC)	\$2,568.00
Todd Slobin (TS)	\$10,925.00
	\$97,968.50

November 2020

Colin Elliott (CE)	\$456.00
David Matthew Haynie (DMH)	\$6,090.00
Melinda Arbuckle (MA)	\$21,460.00
Ricardo Prieto (RP)	\$10,802.50
Susan Cavanaugh (SC)	\$3,936.00
Trena Mack (TM)	\$456.00
Todd Slobin (TS)	\$12,825.00
	\$56,025.50

December 2020

Timekeeper	Total Amount Billed
David Matthew Haynie (DMH)	\$362.50
Melinda Arbuckle (MA)	\$9,123.00
Ricardo Prieto (RP)	\$2,634.00
Susan Cavanaugh (SC)	\$4,234.00
Todd Slobin (TS)	\$24.00
Yeneby Angeles (YA)	\$24.00
	\$16,401.50

July 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
7/1/2020	YA	LA	0.4	\$240.00	\$96.00	Route calls to alliedinfo box
7/1/2020	SC	LA	2.1	\$240.00	\$504.00	Return calls (11), gather consent form
7/1/2020	MA	CC	0.1	\$725.00	\$72.50	Email with Phoenix re first consent forms
7/2/2020	SC	LA	2.5	\$240.00	\$600.00	Return calls (13), forward two emails to MA for response
7/2/2020	MA	CC	0.4	\$725.00	\$290.00	Privileged client emails
7/2/2020	SC	LA	0.2	\$240.00	\$48.00	Work on service of Renewed Objections in Hakeem
7/2/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails with Phoenix, cannot get reporting
7/2/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails with Phoenix, cannot get reporting
7/3/2020	SC	LA	3.1	\$240.00	\$744.00	Return calls (14), forward one email to MA for response
7/3/2020	MA	CC	0.2	\$725.00	\$145.00	Privileged client email
7/6/2020	SC	LA	5.9	\$240.00	\$1,416.00	Return calls (26), gather consent forms
7/6/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/6/2020	DH	LA	5.4	\$240.00	\$1,296.00	Return calls (27)
7/6/2020	YA	LA	5.4	\$240.00	\$1,296.00	Return calls (27)
7/6/2020	MA	CC	0.5	\$725.00	\$362.50	Respond to client emails
7/6/2020	MA	CC	4.1	\$725.00	\$2,972.50	Work on Ex Parte App in Hakeem
7/6/2020	SC	LA	0.2	\$240.00	\$48.00	Work on service of Complaint in intervention
7/6/2020	MA	CC	0.4	\$725.00	\$290.00	Phone call with competing settlement administrator
7/6/2020	SC	LA	0.1	\$240.00	\$24.00	Review and respond to email from Phoenix re duplicates
7/6/2020	RP	CC	0.3	\$725.00	\$217.50	Review ECF No. 119 - Def's Second Am Compl
7/6/2020	MA	CC	0.3	\$725.00	\$217.50	Review ECF No. 119 - Def's Second Am Compl
7/7/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/7/2020	SC	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/7/2020	DH	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/7/2020	YA	LA	4	\$240.00	\$960.00	Return calls (20)
7/7/2020	MA	CC	0.5	\$725.00	\$362.50	Respond to client emails
7/7/2020	MA	CC	3.1	\$725.00	\$2,247.50	Finish Ex Parte App for RP Review
7/7/2020	RP	CC	1.1	\$725.00	\$797.50	Review Ex Parte App in Hakeem
7/7/2020	SC	LA	0.2	\$240.00	\$48.00	Work on service of Ex Parte App in Hakeem
7/7/2020	RP	CC	0.7	\$725.00	\$507.50	Review and discuss oppo to Ex Parte App in Hakeem
7/7/2020	MA	CC	0.7	\$725.00	\$507.50	Review and discuss oppo to Ex Parte App in Hakeem
7/7/2020	SC	LA	2	\$240.00	\$480.00	Work on filing notices, update client list
7/7/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 120-123
7/7/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 120-123
7/8/2020	TM	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/8/2020	SC	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/8/2020	DH	LA	4	\$240.00	\$960.00	Return calls (20)
7/8/2020	YA	LA	3.8	\$240.00	\$912.00	Return calls (19)
7/8/2020	MA	CC	0.5	\$725.00	\$362.50	Respond to client emails
7/8/2020	MA	CC	0.3	\$725.00	\$217.50	Review order denying ex parte motion to continue
7/8/2020	RP	CC	0.3	\$725.00	\$217.50	Review order denying ex parte motion to continue
7/8/2020	MA	CC	0.4	\$725.00	\$290.00	Call with Phoenix rep re issues with notice process, call center
7/8/2020	SC	LA	2	\$240.00	\$480.00	Work on filing notices, update client list
7/8/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 124 (Consents)
7/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 124 (Consents)
7/9/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/9/2020	EC	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/9/2020	SC	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/9/2020	DH	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/9/2020	YA	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/9/2020	MA	CC	1	\$725.00	\$725.00	Respond to client emails
7/9/2020	MA	CC	0.4	\$725.00	\$290.00	Discussion with Phoenix rep re issue with links in email
7/9/2020	MA	CC	0.5	\$725.00	\$362.50	Privileged client call
7/9/2020	SC	LA	2	\$240.00	\$480.00	Work on filing notices, update client list
7/9/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos.125-138 (Consents)
7/9/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos.125-138 (Consents)
7/9/2020	MA	CC	0.1	\$725.00	\$72.50	Request quote from Phoenix re call center
7/10/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/10/2020	EC	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/10/2020	SC	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/10/2020	DH	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/10/2020	YA	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/10/2020	MA	CC	0.5	\$725.00	\$362.50	Respond to client emails, calls

July 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
7/10/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails with Phoenix staff re issues with PSA ID numbers
7/10/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails with Phoenix staff re issues with PSA ID numbers
7/10/2020	MA	CC	0.5	\$725.00	\$362.50	Call with Phoenix rep to discuss PSA ID Number utility
7/10/2020	MA	CC	0.2	\$725.00	\$145.00	Review weekly report from Phoenix rep
7/10/2020	DH	LA	1.6	\$240.00	\$384.00	Work on consent form exhibits, update client list
7/10/2020	SC	LA	0.2	\$240.00	\$48.00	File and save consents to file
7/10/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 129-131 (Consents)
7/10/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 129-131 (Consents)
7/12/2020	RP	CC	0.1	\$725.00	\$72.50	Email MA re hearing on July 12
7/12/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
7/13/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/13/2020	EC	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/13/2020	SC	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/13/2020	DH	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/13/2020	YA	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/13/2020	BM	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/13/2020	MA	CC	1.2	\$725.00	\$870.00	Respond to client emails
7/13/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails re staff needs going forward with client calls
7/13/2020	DMH	CC	0.2	\$725.00	\$145.00	Various emails re staff needs going forward with client calls
7/13/2020	MA	CC	0.3	\$725.00	\$217.50	Work on setting court call for hearing in Hakeem
7/13/2020	MA	CC	2.1	\$725.00	\$1,522.50	Initial prep for hearing on motion for final approval in Hakeem
7/13/2020	SC	LA	0.6	\$240.00	\$144.00	Work on setting court call for hearing in Hakeem
7/13/2020	SC	LA	0.2	\$240.00	\$48.00	Send materials to FH for client calls
7/13/2020	MA	CC	0.1	\$725.00	\$72.50	Approve materials to be sent to FH
7/13/2020	DMH	CC	0.2	\$725.00	\$145.00	Review materials from SLS re client calls
7/13/2020	TM	LA	0.5	\$240.00	\$120.00	Review materials from SLS re client calls
7/13/2020	MA	CC	0.1	\$725.00	\$72.50	Review tentative order continuing hearing on final approval Hakeem
7/13/2020	RP	CC	0.1	\$725.00	\$72.50	Review tentative order continuing hearing on final approval Hakeem
7/14/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/14/2020	EC	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/14/2020	SC	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/14/2020	DH	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/14/2020	YA	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/14/2020	BM	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/14/2020	MA	CC	6	\$725.00	\$4,350.00	Return calls (30)
7/14/2020	MA	CC	0.2	\$725.00	\$145.00	Review various emails re hearing on final approval canceled
7/14/2020	RP	CC	0.2	\$725.00	\$145.00	Review various emails re hearing on final approval canceled
7/14/2020	MA	CC	0.1	\$725.00	\$72.50	Email with Phoenix rep re consent forms
7/14/2020	SC	LA	1.3	\$240.00	\$312.00	Work on consent forms, amending, filing, saving
7/14/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 132 (Consents)
7/14/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 132 (Consents)
7/15/2020	SC	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/15/2020	YA	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/15/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/15/2020	MA	CC	2.5	\$725.00	\$1,812.50	Respond to client emails
7/15/2020	RP	CC	1.5	\$725.00	\$1,087.50	Work with MA on responding to client emails
7/15/2020	DH	LA	1	\$240.00	\$240.00	Work on exhibits for consent filing, update client list
7/15/2020	SC	LA	0.2	\$240.00	\$48.00	file consents, save to file
7/15/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 133-135 (Consents)
7/15/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 133-135 (Consents)
7/16/2020	TM	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/16/2020	EC	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/16/2020	SC	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/16/2020	DH	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/16/2020	YA	LA	10	\$240.00	\$2,400.00	Return calls (50)
7/16/2020	MA	CC	1.5	\$725.00	\$1,087.50	Respond to client emails
7/16/2020	SC	LA	0.1	\$240.00	\$24.00	Email file stamped complaint in Hakeem to MA
7/16/2020	RP	CC	0.1	\$725.00	\$72.50	Instructions to staff to gather client information
7/16/2020	RP	CC	0.9	\$725.00	\$652.50	Privileged client call
7/17/2020	TM	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/17/2020	SC	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/17/2020	YA	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/17/2020	MA	CC	0.8	\$725.00	\$580.00	Respond to client emails

July 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
7/17/2020	DH	LA	4.1	\$240.00	\$984.00	Work on exhibits for consent filing, update client list
7/17/2020	SC	LA	0.3	\$240.00	\$72.00	File and save consents to file
7/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 136-140 (Consents)
7/17/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 136-140 (Consents)
7/17/2020	MA	CC	0.2	\$725.00	\$145.00	Emails transmitting complaint in intervention to OC
7/17/2020	MA	CC	0.3	\$725.00	\$217.50	Work with Phoenix on obtaining consent forms
7/17/2020	RP	CC	0.2	\$725.00	\$145.00	Discussion re process for obtaining claim forms, delays with Phoenix
7/17/2020	MA	CC	0.2	\$725.00	\$145.00	Discussion re process for obtaining claim forms, delays with Phoenix
7/17/2020	TS	CC	0.4	\$725.00	\$290.00	Discuss settlement, service of process in Hakeem with OC
7/18/2020	MA	CC	2.2	\$725.00	\$1,595.00	Catch up client emails and calls
7/19/2020	MA	CC	1	\$725.00	\$725.00	Catch up client emails and calls
7/20/2020	SC	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/20/2020	TM	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/20/2020	YA	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/20/2020	MA	CC	1.2	\$725.00	\$870.00	Client emails
7/20/2020	DMH	CC	0.6	\$725.00	\$435.00	Meeting re expectations on client calls, progress
7/20/2020	MA	CC	0.6	\$725.00	\$435.00	Meeting re expectations on client calls, progress
7/20/2020	TM	LA	0.6	\$240.00	\$144.00	Meeting re expectations on client calls, progress
7/20/2020	SC	LA	0.6	\$240.00	\$144.00	Meeting re expectations on client calls, progress
7/21/2020	SC	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/21/2020	TM	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/21/2020	YA	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/21/2020	MA	CC	0.5	\$725.00	\$362.50	Client emails
7/21/2020	MA	CC	0.7	\$725.00	\$507.50	Initial review of MTS in Hakeem, discuss with RP
7/21/2020	RP	CC	0.8	\$725.00	\$580.00	Initial review of MTS in Hakeem, discuss with MA
7/21/2020	MA	CC	0.4	\$725.00	\$290.00	Develop FAQ for client questions in alliedinfo
7/21/2020	RP	CC	0.1	\$725.00	\$72.50	Respond to MA re proposal for deceased clients
7/21/2020	MA	CC	0.3	\$725.00	\$217.50	Review email from Phoenix re deceased clients, discuss with RP, respond
7/21/2020	DH	LA	1.2	\$240.00	\$288.00	Work on exhibits for consent filing, file, save to file
7/21/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 141-144 (Consents)
7/21/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 141-144 (Consents)
7/22/2020	SC	LA	6	\$240.00	\$1,440.00	Return calls (30)
7/22/2020	MA	CC	1.2	\$725.00	\$870.00	Client emails
7/22/2020	MA	CC	0.1	\$725.00	\$72.50	Forward Motion to Strike in Hakeem to TS
7/22/2020	TS	SC	0.4	\$950.00	\$380.00	Review Motion to Strike
7/22/2020	MA	CC	0.2	\$725.00	\$145.00	Work with client on issue with consent form
7/23/2020	SC	LA	4	\$240.00	\$960.00	Return calls (20)
7/23/2020	DH	LA	4	\$240.00	\$960.00	Return calls (20)
7/23/2020	YA	LA	4	\$240.00	\$960.00	Return calls (20)
7/23/2020	MA	CC	1	\$725.00	\$725.00	Client emails
7/23/2020	MA	CC	0.1	\$725.00	\$72.50	Discuss calendaring MTS in Hakeem with SC
7/23/2020	SC	LA	0.1	\$240.00	\$24.00	Discuss calendaring MTS in Hakeem with MA
7/23/2020	SC	LA	2.5	\$240.00	\$600.00	Work on exhibits for consent filing, file
7/23/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF no. 145 (Consents)
7/23/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF no. 145 (Consents)
7/24/2020	TM	LA	8	\$240.00	\$1,920.00	Return calls (40)
7/24/2020	SC	LA	4	\$240.00	\$960.00	Return calls (20)
7/24/2020	YA	LA	4	\$240.00	\$960.00	Return calls (20)
7/24/2020	MA	CC	1.5	\$725.00	\$1,087.50	Client call and emails
7/24/2020	SC	LA	0.4	\$240.00	\$96.00	Discussion with Phoenix rep re delays in receiving consent forms
7/24/2020	MA	CC	0.4	\$725.00	\$290.00	Discussion with Phoenix rep re delays in receiving consent forms
7/25/2020	MA	CC	1	\$725.00	\$725.00	Catch up client calls
7/26/2020	MA	CC	2.4	\$725.00	\$1,740.00	Catch up client calls and emails
7/26/2020	DMH	CC	0.3	\$725.00	\$217.50	Brief discussion re client issues in Allied
7/26/2020	MA	CC	0.3	\$725.00	\$217.50	Brief discussion re client issues in Allied
7/26/2020	DMH	CC	0.1	\$725.00	\$72.50	email staff re client issues in Allied
7/27/2020	TM	LA	8	\$240.00	\$1,920.00	Return calls (30)
7/27/2020	SC	LA	4	\$240.00	\$960.00	Return calls (20)
7/27/2020	YA	LA	4	\$240.00	\$960.00	Return calls (20)
7/27/2020	MA	CC	0.5	\$725.00	\$362.50	Client emails
7/27/2020	DH	LA	5.1	\$240.00	\$1,224.00	Work on exhibits for consent filing
7/27/2020	SC	LA	0.7	\$240.00	\$168.00	File and save consents to file
7/27/2020	RP	CC	0.2	\$725.00	\$145.00	Review ECF Nos. 146-156 (Consents)

July 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
7/27/2020	MA	CC	0.2	\$725.00	\$145.00	Review ECF Nos. 146-156 (Consents)
7/27/2020	YA	LA	0.1	\$240.00	\$24.00	Question for MA re deceased clients
7/27/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to YA email
7/27/2020	MA	CC	0.1	\$725.00	\$72.50	Correct calendar issue
7/28/2020	TM	LA	4	\$240.00	\$960.00	Return calls (20)
7/28/2020	SC	LA	4.5	\$240.00	\$1,080.00	Return calls (20), gather consent forms
7/28/2020	MA	CC	5	\$725.00	\$3,625.00	Respond to client emails, calls
7/29/2020	TM	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/29/2020	SC	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/29/2020	YA	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/29/2020	MA	CC	0.1	\$725.00	\$72.50	Review tentative order granting RP PHV, instructions to staff
7/29/2020	RP	CC	0.1	\$725.00	\$72.50	Review tentative order granting RP PHV
7/29/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re issue of service with RP PHV, forward
7/29/2020	TS	SC	0.3	\$950.00	\$285.00	Case strategy conference re RP PHV
7/29/2020	RP	CC	0.3	\$725.00	\$217.50	Case strategy conference re RP PHV
7/29/2020	MA	CC	0.3	\$725.00	\$217.50	Case strategy conference re RP PHV
7/29/2020	SC	LA	0.3	\$240.00	\$72.00	Case strategy conference re RP PHV
7/29/2020	SC	LA	1.5	\$240.00	\$360.00	Work on filing notices, update client list
7/29/2020	MA	CC	0.1	\$240.00	\$24.00	Review ECF No. 157 (Consents)
7/29/2020	RP	CC	0.1	\$240.00	\$24.00	Review ECF Nos. 157 (Consents)
7/29/2020	MA	CC	0.5	\$725.00	\$362.50	Review and discuss Def's Mot to Strike Complaint (Hakeem)
7/29/2020	RP	CC	0.5	\$725.00	\$362.50	Review and discuss Def's Mot to Strike Complaint (Hakeem)
7/30/2020	SC	LA	5	\$240.00	\$1,200.00	Return calls (25), gather consent forms
7/30/2020	YA	LA	5	\$240.00	\$1,200.00	Return calls (25)
7/30/2020	MA	CC	2.5	\$725.00	\$1,812.50	Respond to client emails, calls
7/30/2020	MA	CC	0.3	\$725.00	\$217.50	Various corr with Cole and OC re service of PHV
7/30/2020	MA	CC	2.5	\$725.00	\$1,812.50	Prep and attend hearing re RP PHV in Hakeem
7/30/2020	RP	CC	1.9	\$725.00	\$1,377.50	Prep and attend hearing re RP PHV in Hakeem
7/30/2020	SC	LA	0.4	\$240.00	\$96.00	Work on second PHV app in Hakeem
7/30/2020	RP	CC	0.1	\$725.00	\$72.50	Review second PHV app
7/31/2020	SC	LA	2.5	\$240.00	\$600.00	Return calls (10), respond to emails
7/31/2020	YA	LA	2.4	\$240.00	\$576.00	Return calls (13), send consent forms
7/31/2020	TM	LA	4	\$725.00	\$2,900.00	Return calls (20)
7/31/2020	MA	CC	0.1	\$725.00	\$72.50	Edit SC draft second motion for PHV Hakeem
7/31/2020	MA	CC	0.1	\$725.00	\$72.50	Question for SC re timing of response to motion to strike Hakeem Compl
7/31/2020	SC	LA	0.2	\$240.00	\$48.00	Finalize and serve Hakeem PHV for Prieto
7/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from OC re service list
7/31/2020	DH	LA	3	\$240.00	\$720.00	Work on exhibits for consent filing
7/31/2020	SC	LA	0.5	\$240.00	\$120.00	File and save consents to file
7/31/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 159-162 (Consents)
7/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 159-162 (Consents)
\$179,461.00						

August 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
8/1/2020	MA	CC	1.2	\$725.00	\$870.00	Catch up on alliedinfo client calls
8/2/2020	MA	CC	1	\$725.00	\$725.00	Catch up on alliedinfo client calls, emails
8/3/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/3/2020	SC	LA	0.8	\$240.00	\$192.00	Respond to calls (3) and emails requesting consent forms
8/3/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/3/2020	DH	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/4/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/4/2020	SC	LA	2.5	\$240.00	\$600.00	Respond to calls (7) and emails
8/4/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/4/2020	DH	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/4/2020	DMH	CC	0.1	\$725.00	\$72.50	Coordinate client calls via email
8/4/2020	MA	CC	0.1	\$725.00	\$72.50	Coordinate client calls via email
8/4/2020	SC	LA	0.4	\$240.00	\$96.00	Address issues with RP PHV in Hakeem
8/5/2020	TM	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/5/2020	SC	LA	2	\$240.00	\$480.00	Manage alliedinfo inbox, return emails requesting consent forms, calls
8/5/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/5/2020	DH	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/5/2020	MA	CC	0.8	\$725.00	\$580.00	Client calls
8/5/2020	RP	CC	0.2	\$725.00	\$145.00	Work with YA on client issue
8/5/2020	SC	LA	0.3	\$240.00	\$72.00	Work on filing RP PHV with Cal Bar
8/5/2020	MA	CC	0.1	\$725.00	\$72.50	Review SC work
8/5/2020	RP	CC	0.1	\$725.00	\$72.50	Review SC work
8/6/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/6/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/6/2020	DH	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/6/2020	SC	LA	1.5	\$240.00	\$360.00	Respond to calls (5), gather consent forms, respond to emails requesting forms
8/6/2020	MA	CC	1.2	\$725.00	\$870.00	Client calls and follow up emails
8/6/2020	SC	LA	0.5	\$240.00	\$120.00	Work on amended PHV (Prieto)
8/6/2020	DH	LA	0.8	\$240.00	\$192.00	Work on exhibits for notices of consents, update client list
8/6/2020	SC	LA	0.2	\$240.00	\$48.00	File notice of consent, save to file
8/6/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 163 (Notice of Consent)
8/6/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 163 (Notice of Consent)
8/7/2020	TM	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/7/2020	SC	LA	2.8	\$240.00	\$672.00	Respond to calls (10), gather consent forms, respond to emails requesting forms
8/7/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/7/2020	MA	CC	0.6	\$725.00	\$435.00	Respond to client calls
8/7/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails with Phoenixe re process of consents, review reporting
8/8/2020	MA	CC	1	\$725.00	\$725.00	Catch up client calls, emails
8/9/2020	MA	CC	0.8	\$725.00	\$580.00	Catch up client calls, emails
8/10/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/10/2020	BM	LA	1.8	\$240.00	\$432.00	Respond to calls, send emails to those requesting forms
8/10/2020	SC	LA	2.5	\$240.00	\$600.00	Respond to calls (10), respond to emails
8/10/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/10/2020	DH	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/10/2020	DH	LA	1.1	\$240.00	\$264.00	Work on exhibits for notices of consents, update client list
8/10/2020	SC	LA	0.2	\$240.00	\$48.00	File notice of consent
8/10/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 164 (Notice of Consent)
8/10/2020	RP	CC	0.1	\$275.00	\$27.50	Review ECF No. 164 (Notice of Consent)
8/10/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 164 (Notice of Consent), save to file
8/11/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/11/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/11/2020	DH	LA	2	\$240.00	\$480.00	Respond to calls (10)
8/11/2020	SC	LA	1.5	\$240.00	\$360.00	Respond to calls (5), gather consent forms, respond to emails requesting forms
8/11/2020	SC	LA	6	\$240.00	\$1,440.00	Work on exhibits for notices of consents, update client list
8/11/2020	DH	LA	5.5	\$240.00	\$1,320.00	Work on exhibits for notices of consents, file
8/11/2020	RP	CC	0.3	\$725.00	\$217.50	Review ECF Nos. 165-175 (Notice of Consent)
8/11/2020	MA	CC	0.3	\$725.00	\$217.50	Review ECF Nos. 165-175 (Notice of Consent)
8/11/2020	SC	LA	0.5	\$240.00	\$120.00	Review ECF Nos. 165-175 (Notice of Consent), save to file
8/12/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/12/2020	DH	LA	3	\$240.00	\$720.00	Respond to calls (15)
8/12/2020	BM	LA	1	\$240.00	\$240.00	Respond to calls, send emails to those requesting forms
8/12/2020	SC	LA	1.5	\$240.00	\$360.00	Respond to calls, gather consent forms, respond to emails
8/12/2020	DH	LA	4.1	\$240.00	\$984.00	Work on exhibits for notices of consents, update client list

August 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
8/12/2020	SC	LA	3	\$240.00	\$720.00	Work on exhibits for notices of consents, file
8/12/2020	RP	CC	0.2	\$725.00	\$145.00	Review ECF Nos. 176-186 (Notice of Consent)
8/12/2020	MA	CC	0.2	\$725.00	\$145.00	Review ECF Nos. 176-186 (Notice of Consent)
8/12/2020	SC	LA	0.6	\$240.00	\$144.00	Review ECF Nos. 176-186 (Notice of Consent), save to file
8/13/2020	TM	LA	3	\$240.00	\$720.00	Respond to calls (15)
8/13/2020	DH	LA	1.4	\$240.00	\$336.00	Respond to calls (7)
8/13/2020	SC	LA	2	\$240.00	\$480.00	Respond to calls and emails
8/13/2020	YA	LA	1.4	\$240.00	\$336.00	Respond to calls (7)
8/13/2020	MA	CC	4.3	\$725.00	\$3,117.50	Draft Resp in Opp to Def's Mot to Strike in Hakeem
8/13/2020	RP	CC	0.1	\$725.00	\$72.50	Emails re Def's Mot to Strike in Hakeem
8/13/2020	MA	CC	0.1	\$725.00	\$72.50	Emails re Def's Mot to Strike in Hakeem
8/13/2020	YA	LA	0.1	\$240.00	\$24.00	Question to MA re retaliation
8/13/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to YA question
8/14/2020	SC	LA	1.4	\$240.00	\$336.00	Respond to calls (4) and emails
8/14/2020	DH	LA	1	\$240.00	\$240.00	Respond to calls (5)
8/14/2020	BM	LA	1	\$240.00	\$240.00	Respond to calls (5)
8/14/2020	YA	LA	1	\$240.00	\$240.00	Respond to calls (5)
8/14/2020	MA	CC	2.4	\$725.00	\$1,740.00	Finish draft Resp in Opp to Def's Mot to Strike in Hakeem
8/14/2020	RP	CC	0.5	\$725.00	\$362.50	Review MA draft Resp in Opp
8/14/2020	MA	CC	2.5	\$725.00	\$1,812.50	Finish supporting docs re Opp to Def's Mot to Strike in Hakeem, send to SC
8/14/2020	SC	LA	0.2	\$240.00	\$48.00	Work on service
8/14/2020	SC	LA	0.7	\$240.00	\$168.00	Work on amended PHV (Prieto)
8/14/2020	MA	CC	0.1	\$725.00	\$72.50	Forward last 408 email to TS
8/14/2020	MA	CC	0.1	\$950.00	\$95.00	Request status of settlement from MA, review email
8/14/2020	MA	CC	0.2	\$725.00	\$145.00	Review reporting from Phoenix re notice
8/14/2020	SC	LA	0.2	\$240.00	\$48.00	Review reporting from Phoenix re notice
8/14/2020	DH	LA	4.5	\$240.00	\$1,080.00	Work on notice of filing consent exhibits, update client list
8/14/2020	SC	LA	0.2	\$240.00	\$48.00	File notice of consent
8/14/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 187 (Notice of Consent)
8/14/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 187 (Notice of Consent)
8/14/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 187 (Notice of Consent), save to file
8/15/2020	MA	CC	1.8	\$725.00	\$1,305.00	Catch up client calls, emails
8/16/2020	MA	CC	0.4	\$725.00	\$290.00	Catch up client calls
8/17/2020	LS	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/17/2020	BM	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/17/2020	YA	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/17/2020	SC	LA	2.8	\$240.00	\$672.00	Respond to client calls (14), send consent forms, respond to emails
8/17/2020	TS	SC	0.2	\$950.00	\$190.00	Initial emails re polling clients for damage model
8/17/2020	DH	LA	0.2	\$240.00	\$48.00	Initial emails re polling clients for damage model
8/17/2020	SC	LA	0.2	\$240.00	\$48.00	Initial emails re polling clients for damage model
8/17/2020	RP	CC	0.2	\$725.00	\$145.00	Initial emails re polling clients for damage model
8/17/2020	MA	CC	0.2	\$725.00	\$145.00	Initial emails re polling clients for damage model
8/17/2020	TS	SC	0.5	\$950.00	\$475.00	Call with OC re mediators, email to RP MA
8/17/2020	RP	CC	0.1	\$725.00	\$72.50	Review emails with TS and MA re mediators, respond
8/17/2020	MA	CC	0.5	\$725.00	\$362.50	Review emails with RP, TS re mediators, get mediator availability
8/17/2020	DH	LA	4.3	\$240.00	\$1,032.00	Work on notice of filing consent exhibits, update client list
8/17/2020	SC	LA	0.5	\$240.00	\$120.00	File notice of consent
8/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 188-193 (Notice of Consent)
8/17/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 188-193 (Notice of Consent)
8/18/2020	SC	LA	0.3	\$240.00	\$72.00	Review ECF Nos. 188-193 (Notice of Consent), save to file
8/18/2020	YA	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/18/2020	SC	LA	2.8	\$240.00	\$672.00	Respond to client calls (14), send consent forms, respond to emails
8/18/2020	TS	SC	0.5	\$950.00	\$475.00	Meeting re polling clients re hours of work for damage model
8/18/2020	DH	LA	0.5	\$240.00	\$120.00	Meeting re polling clients re hours of work for damage model
8/18/2020	SC	LA	0.5	\$240.00	\$120.00	Meeting re polling clients re hours of work for damage model
8/18/2020	RP	CC	0.5	\$725.00	\$362.50	Meeting re polling clients re hours of work for damage model
8/18/2020	MA	CC	0.5	\$725.00	\$362.50	Meeting re polling clients re hours of work for damage model
8/18/2020	MA	CC	2.4	\$725.00	\$1,740.00	Prep and attend hearing re final approval Hakeem
8/18/2020	RP	CC	1.1	\$725.00	\$797.50	Prep and attend hearing re final approval Hakeem
8/18/2020	DH	LA	1	\$240.00	\$240.00	Work on notice of filing consent exhibits
8/18/2020	SC	LA	0.1	\$240.00	\$24.00	File notice of consent
8/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 194 (Notice of Consent)
8/18/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 194 (Notice of Consent)

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
8/18/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 194 (Notice of Consent), save to file
8/19/2020	TM	LA	5	\$240.00	\$1,200.00	Respond to client calls (20)
8/19/2020	YA	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/19/2020	SC	LA	5	\$240.00	\$1,200.00	Respond to client calls (15), gather consent forms, respond to emails
8/19/2020	MA	CC	1	\$725.00	\$725.00	Client calls
8/19/2020	TS	SC	0.1	\$950.00	\$95.00	Emails re software for polling clients
8/19/2020	DH	LA	0.1	\$240.00	\$24.00	Emails re software for polling clients
8/20/2020	YA	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/20/2020	SC	LA	2.8	\$240.00	\$672.00	Respond to client calls (13), gather consent forms, respond to emails
8/20/2020	MA	CC	0.4	\$725.00	\$290.00	Brief case strategy conference re discovery requests
8/20/2020	RP	CC	0.4	\$725.00	\$290.00	Brief case strategy conference re discovery requests
8/20/2020	MA	CC	1.2	\$725.00	\$870.00	Begin work on discovery requests for D
8/20/2020	RP	CC	0.3	\$725.00	\$217.50	Review Defendant's Reply ISO Mot to Strike Compl in Hakeem
8/20/2020	MA	CC	0.3	\$725.00	\$217.50	Review Defendant's Reply ISO Mot to Strike Compl in Hakeem
8/20/2020	TS	SC	0.3	\$950.00	\$285.00	Various emails re polling plaintiffs via survey
8/20/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails re polling plaintiffs via survey
8/20/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re polling plaintiffs via survey
8/20/2020	SC	LA	0.3	\$240.00	\$72.00	Various emails re polling plaintiffs via survey
8/20/2020	MA	CC	0.2	\$725.00	\$145.00	Privileged client emails
8/21/2020	YA	LA	2	\$240.00	\$480.00	Respond to client calls (10), send consent forms
8/21/2020	SC	LA	2.8	\$240.00	\$672.00	Respond to client calls (13), gather consent forms, respond to emails
8/21/2020	MA	CC	4.9	\$725.00	\$3,552.50	Prepare discovery requests
8/21/2020	RP	CC	0.5	\$725.00	\$362.50	Review MA draft discovery requests
8/21/2020	SC	LA	0.4	\$240.00	\$96.00	Serve discovery requests
8/21/2020	MA	CC	0.7	\$725.00	\$507.50	Work with Phoenix on reminder postcards
8/21/2020	MA	CC	0.4	\$725.00	\$290.00	Various emails with Phoenix re issues with reporting
8/21/2020	MA	CC	0.6	\$725.00	\$435.00	Draft corr to OC re extending deadlines
8/21/2020	RP	CC	0.2	\$725.00	\$145.00	Review MA corr
8/21/2020	MA	CC	0.2	\$725.00	\$145.00	Privileged client emails
8/21/2020	MA	CC	0.4	\$725.00	\$290.00	Privileged client call
8/22/2020	MA	CC	1.5	\$240.00	\$360.00	Respond to client calls (5), and emails
8/22/2020	MA	CC	0.9	\$725.00	\$652.50	Review emails and discovery requests from Defendant, email RP
8/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from MA, respond
8/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from RP
8/23/2020	MA	LA	2.4	\$240.00	\$576.00	Respond to client calls (7), and emails
8/24/2020	TM	LA	2	\$240.00	\$480.00	Respond to client calls (10)
8/24/2020	SC	LA	1	\$240.00	\$240.00	Respond to client calls (7), and emails
8/24/2020	YA	LA	0.8	\$240.00	\$192.00	Respond to client calls (7), send consent forms
8/24/2020	MA	CC	0.5	\$240.00	\$120.00	Confer with Phoenix representative re reminder postcards
8/24/2020	DH	LA	1.5	\$240.00	\$360.00	Work on notice of filing consent exhibits
8/24/2020	SC	LA	0.2	\$140.00	\$28.00	File notice of consent
8/24/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 195, 196 (Notice of Consent)
8/24/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 195, 196 (Notice of Consent)
8/24/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF Nos. 195, 196 (Notice of Consent), save to file
8/25/2020	TM	LA	4	\$240.00	\$960.00	Respond to calls (20)
8/25/2020	BM	LA	2	\$240.00	\$480.00	Respond to calls (8), send consent forms
8/25/2020	YA	LA	2	\$240.00	\$480.00	Respond to calls (8), send consent forms
8/25/2020	SC	LA	2.5	\$240.00	\$600.00	Respond to calls (8), and emails
8/25/2020	MA	CC	1.2	\$725.00	\$870.00	Client calls
8/25/2020	DH	LA	2.9	\$240.00	\$696.00	Work on notice of filing consent exhibits
8/25/2020	SC	LA	0.3	\$240.00	\$72.00	File notice of consent
8/25/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 197-199 (Notice of Consent)
8/25/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 197-199 (Notice of Consent)
8/25/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF Nos. 197-199 (Notice of Consent), save to file
8/26/2020	BM	LA	2.2	\$240.00	\$528.00	Respond to calls (11), send consent forms
8/26/2020	YA	LA	2.2	\$240.00	\$528.00	Respond to calls (11), send consent forms
8/26/2020	SC	LA	2.6	\$240.00	\$624.00	Respond to calls (11), send emails
8/26/2020	MA	CC	0.5	\$725.00	\$362.50	Review email, materials from Bruce Murray, discuss with RP, TS
8/26/2020	RP	CC	0.5	\$725.00	\$362.50	Review email, materials from Bruce Murray, discuss with MA, TS
8/26/2020	TS	SC	0.3	\$950.00	\$285.00	Review email, materials from Bruce Murray, discuss with MA, RP
8/26/2020	MA	CC	0.2	\$725.00	\$145.00	Email OC re ineffective service
8/26/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email re ineffective service
8/26/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email re ineffective service

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
8/26/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails re status of Hakeem
8/26/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails re status of Hakeem
8/26/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails re status of Hakeem
8/27/2020	SC	LA	2	\$240.00	\$480.00	Respond to calls (10) and emails
8/27/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from Bruce Murray re objection, email to MA
8/27/2020	JF	CC	0.1	\$725.00	\$72.50	Review emails from Bruce Murray, DMH
8/27/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to DMH email
8/27/2020	DMH	CC	0.1	\$725.00	\$72.50	Review MA response to MA email, respond
8/27/2020	SC	LA	0.1	\$240.00	\$24.00	Forward final approval order to MA, RP
8/27/2020	MA	CC	0.2	\$725.00	\$145.00	Review final order Hakeem granting Final Approval
8/27/2020	RP	CC	0.2	\$725.00	\$145.00	Review final order Hakeem granting Final Approval
8/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review email report from Phoenix
8/28/2020	MA	CC	0.1	\$725.00	\$72.50	Review email report from Phoenix
8/28/2020	SC	LA	4	\$240.00	\$960.00	Respond to calls (16) and emails
8/28/2020	MA	CC	0.1	\$725.00	\$72.50	Forward letter re extend case deadlines to TS
8/28/2020	TS	CC	0.2	\$950.00	\$190.00	Review MA letter to OC
8/28/2020	DH	LA	0.5	\$240.00	\$120.00	Work on notice of filing consent exhibits
8/28/2020	SC	LA	0.1	\$240.00	\$24.00	File notice of consent
8/28/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 200 (Notice of Consent)
8/28/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 200 (Notice of Consent)
8/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 200 (Notice of Consent), save to file
8/29/2020	MA	CC	0.8	\$725.00	\$580.00	Catch up client calls, emails
8/30/2020	MA	CC	0.5	\$725.00	\$362.50	Catch up client calls, emails
8/30/2020	TS	CC	0.1	\$950.00	\$95.00	email with opposing counsel
8/31/2020	YA	LA	3.4	\$240.00	\$816.00	Respond to client calls (17), send consent forms
8/31/2020	SC	LA	3	\$240.00	\$720.00	Respond to client calls (10), and emails
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Email team with questions re random sample
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to TS email
8/31/2020	MA	CC	0.3	\$725.00	\$217.50	Prep TS to discuss sampling issue
8/31/2020	TS	SC	0.3	\$950.00	\$285.00	Call with MA
8/31/2020	MA	CC	0.5	\$725.00	\$362.50	Draft expert disclosures, instructions to SC to serve
8/31/2020	RP	CC	0.2	\$725.00	\$145.00	Edit expert disclosures
8/31/2020	SC	LA	0.2	\$240.00	\$48.00	Serve expert disclosures
8/31/2020	TS	SC	0.4	\$950.00	\$380.00	Call with opposing counsel re sampling
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Email OC re mediator
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review TS email
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Follow up email with OC re agreement to e-service
8/31/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re agreement to e-service
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review email between OC and TS
8/31/2020	RP	CC	0.1	\$725.00	\$72.50	Review email between OC and TS, respond to TS
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Forward email in Hakeem to TS
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Review email in Hakeem re e-service, follow up email to MA
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to TS email
8/31/2020	MA	CC	0.2	\$725.00	\$145.00	Review Def's expert disclosures
8/31/2020	RP	CC	0.2	\$725.00	\$145.00	Review Def's expert disclosures
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Review email re Def's expert disclosures
8/31/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email re Def's expert disclosures
8/31/2020	TS	SC	0.1	\$950.00	\$95.00	Respond to OC email re e-service
8/31/2020	DH	LA	0.5	\$240.00	\$120.00	Work on notice of filing consent exhibits
8/31/2020	SC	LA	0.1	\$240.00	\$24.00	File notice of consent
8/31/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 201 (Notice of Consent)
8/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 201 (Notice of Consent)
8/31/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 201 (Notice of Consent), save to file
\$88,462.50						

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/1/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from opposing counsel re e-service, forward to MA, RP
9/1/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re e-service
9/1/2020	RP	CC	0.1	\$725.00	\$72.50	Respond to TS email
9/1/2020	TS	SC	0.1	\$950.00	\$95.00	Respond to OC email re e-service
9/1/2020	MA	CC	0.1	\$725.00	\$72.50	Review TS email
9/1/2020	RP	CC	0.1	\$725.00	\$72.50	Review and respond to TS email
9/1/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to TS email
9/1/2020	TS	SC	0.2	\$950.00	\$190.00	Brief case strategy conference
9/1/2020	MA	CC	0.2	\$725.00	\$145.00	Brief case strategy conference
9/1/2020	RP	CC	0.2	\$725.00	\$145.00	Brief case strategy conference
9/1/2020	TS	SC	0.1	\$950.00	\$95.00	Respond to OC email re MSJ, forward to MA, RP
9/1/2020	RP	CC	0.1	\$725.00	\$72.50	Review and respond to TS email
9/1/2020	MA	CC	0.1	\$725.00	\$72.50	Review TS and RP emails
9/1/2020	TM	LA	7	\$240.00	\$1,680.00	Respond to client calls (20 assigned), follow up older calls
9/1/2020	DH	LA	6	\$240.00	\$1,440.00	Respond to client calls and emails (10 calls assigned, 12 emails assigned)
9/1/2020	YA	LA	4	\$240.00	\$960.00	Route calls to inbox, respond to client calls (10 calls assigned)
9/1/2020	ARW	LA	0.6	\$240.00	\$144.00	Send six consent forms through docusign
9/1/2020	SC	LA	5.5	\$240.00	\$1,320.00	Respond to client calls, gather consent forms, respond to emails (10 calls, 20 emails)
9/2/2020	TS	CC	0.1	\$950.00	\$95.00	Forward client call to SC
9/2/2020	SC	LA	0.3	\$240.00	\$72.00	Privileged client call
9/2/2020	TS	SC	0.1	\$950.00	\$95.00	Forward email from OC re confer on MSJ
9/2/2020	RP	CC	0.1	\$725.00	\$72.50	Review email
9/2/2020	MA	CC	0.1	\$725.00	\$72.50	Review email
9/2/2020	MA	CC	7.8	\$725.00	\$5,655.00	Work on LR 37 Stipulation and Declaration
9/2/2020	RP	CC	0.5	\$725.00	\$362.50	Review LR 37 Stipulation
9/2/2020	TS	SC	0.4	\$950.00	\$380.00	Review LR 37 Stipulation
9/2/2020	SC	LA	5.1	\$240.00	\$1,224.00	Respond to client calls, gather consent forms, respond to emails (10 calls, 10 emails)
9/2/2020	DH	LA	5.5	\$240.00	\$1,320.00	Respond to client calls and emails (10 calls assigned, 12 emails assigned)
9/2/2020	ARW	LA	0.5	\$240.00	\$120.00	Send consent forms through docusign
9/2/2020	TM	LA	7.5	\$240.00	\$1,800.00	Respond to client calls (25 assigned), follow up older calls
9/2/2020	YA	LA	3.8	\$240.00	\$912.00	Route calls to inbox, respond to client calls (10 calls assigned)
9/3/2020	MA	CC	1.8	\$725.00	\$1,305.00	Revisions to LR 37 Stipulation, forward to OC
9/3/2020	SC	LA	2.5	\$240.00	\$600.00	Respond to client calls, gather consent forms, respond to emails
9/3/2020	DH	LA	1.5	\$240.00	\$360.00	Respond to client calls (10 calls assigned)
9/3/2020	ARW	LA	0.3	\$240.00	\$72.00	Send consent forms through docusign
9/3/2020	TM	LA	8	\$240.00	\$1,920.00	Respond to client calls (45 assigned), follow up older calls
9/3/2020	YA	LA	2.5	\$240.00	\$600.00	Route calls to inbox, respond to client calls (10 calls assigned)
9/4/2020	MA	CC	4.2	\$725.00	\$3,045.00	Draft 30(b)(6) Notice, send to SC to draft corr and serve
9/4/2020	SC	LA	0.3	\$240.00	\$72.00	Draft corr and serve 30(b)(6) Notice
9/4/2020	RP	CC	0.5	\$725.00	\$362.50	Legal research re Protective Order
9/4/2020	MA	CC	0.3	\$725.00	\$217.50	Review RP research
9/4/2020	SC	LA	0.1	\$240.00	\$24.00	Email MA re paper deposition notices
9/4/2020	MA	LA	0.1	\$725.00	\$72.50	Review SC email
9/4/2020	YA	LA	1.1	\$240.00	\$264.00	Imaging, saving paper deposition notices
9/4/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re mediators
9/4/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from OC re mediators
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re mediators
9/4/2020	SC	LA	0.5	\$240.00	\$120.00	Work on obtaining mediation dates
9/4/2020	TS	SC	0.5	\$950.00	\$475.00	Case strategy call re mediators
9/4/2020	MA	CC	0.5	\$725.00	\$362.50	Case strategy call re mediators
9/4/2020	RP	CC	0.1	\$725.00	\$72.50	Email to MA re data for damage model
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Email OC re mediation date
9/4/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email
9/4/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
9/4/2020	TS	SC	0.6	\$950.00	\$570.00	Draft declaration ISO Ex Parte App
9/4/2020	MA	CC	4.5	\$725.00	\$3,262.50	Research and draft Ex Parte App re unilaterally noticed depositions
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Email conference with OC re unilaterally noticed depositions
9/4/2020	SC	LA	0.3	\$240.00	\$72.00	File Ex Parte App re unilaterally noticed depositions, proposed order
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 202 (Ex Parte)
9/4/2020	RP	CC	0.4	\$725.00	\$290.00	Review ECF No. 202 (Ex Parte)
9/4/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 202 (Ex Parte), save to file
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from Bruce Murray re Toure filing in Hakeem
9/4/2020	RP	CC	0.6	\$725.00	\$435.00	Review filing in Hakeem
9/4/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from Kevin Lee re opt-in forms
9/4/2020	SC	LA	0.5	\$240.00	\$120.00	Work on saving consent forms from website
9/4/2020	SC	LA	2.5	\$240.00	\$600.00	Monitor alliedinfo, direct emails and voicemails

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/4/2020	TM	LA	7.4	\$240.00	\$1,776.00	Return client calls (50 assigned)
9/4/2020	YA	LA	4	\$240.00	\$960.00	Return client calls (25 assigned)
9/4/2020	DH	LA	4	\$240.00	\$960.00	Return client calls (25 assigned)
9/4/2020	ARW	LA	0.5	\$240.00	\$120.00	Send consent forms through docusign
9/7/2020	MA	CC	0.9	\$725.00	\$652.50	Review ECF No. 203 (Def's Oppo to Ex Parte)
9/7/2020	RP	CC	1.1	\$725.00	\$797.50	Review ECF No. 203 (Def's Oppo to Ex Parte)
9/7/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF No. 203 (Def's Oppo to Ex Parte), save to file
9/7/2020	MA	CC	0.2	\$725.00	\$145.00	Review and discuss ECF No. 204 (Order granting Ex Parte)
9/7/2020	RP	CC	0.2	\$725.00	\$145.00	Review and discuss ECF No. 204 (Order granting Ex Parte)
9/7/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 204 (Order granting Ex Parte), save to file
9/7/2020	SC	LA	1.8	\$240.00	\$432.00	Return calls from alliedinfo (25)
9/7/2020	TM	LA	1.8	\$240.00	\$432.00	Return calls from alliedinfo (25)
9/8/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from OC re mediation, discuss
9/8/2020	RP	CC	0.2	\$725.00	\$145.00	Review email from OC re mediation, discuss
9/8/2020	TS	SC	0.2	\$950.00	\$190.00	Review email from OC re mediation, discuss
9/8/2020	SC	LA	0.8	\$240.00	\$192.00	Work on scheduling mediation
9/8/2020	SC	LA	4.5	\$240.00	\$1,080.00	Return calls from alliedinfo, provide responses via email
9/8/2020	YA	LA	2.3	\$240.00	\$552.00	Assist Susan in returning calls from alliedinfo, confirming opt-in status
9/9/2020	RP	CC	0.4	\$725.00	\$290.00	Case strategy call re damage model, survey
9/9/2020	TS	SC	0.4	\$950.00	\$380.00	Case strategy call re damage model, survey
9/9/2020	MA	CC	0.4	\$725.00	\$290.00	Case strategy call re damage model, survey
9/9/2020	MA	CC	0.2	\$725.00	\$145.00	Email mediator assistant re case
9/9/2020	DH	LA	0.1	\$240.00	\$24.00	Forward client voicemail to MA
9/9/2020	MA	CC	0.2	\$725.00	\$145.00	Privileged client call
9/9/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 205, 206 (Notice of Consents)
9/9/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 205, 206 (Notice of Consents)
9/9/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF Nos. 205, 206 (Notice of Consents)
9/9/2020	MA	CC	0.4	\$725.00	\$290.00	Call with OC re extend deadlines
9/9/2020	MA	CC	0.5	\$725.00	\$362.50	work on proposals for new case deadlines, forward to co-counsel
9/9/2020	TS	SC	0.2	\$950.00	\$190.00	Review MA proposals, provide feedback
9/9/2020	RP	CC	0.2	\$725.00	\$145.00	Review MA proposals, provide feedback
9/9/2020	MA	CC	0.2	\$725.00	\$145.00	Edit and email to OC
9/9/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email with OC
9/9/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email with OC
9/9/2020	MA	CC	0.7	\$725.00	\$507.50	Work on survey to opt-in plaintiffs re off-the-clock work
9/9/2020	SC	LA	4.2	\$725.00	\$3,045.00	Work on contact spreadsheet to facilitate survey
9/9/2020	TS	CC	0.4	\$950.00	\$380.00	Work on uploading survey, email addresses, prep for sending
9/9/2020	SC	LA	1.4	\$240.00	\$336.00	Gather consent forms and client calls
9/9/2020	DH	LA	0.9	\$240.00	\$216.00	Confirm opt-in status for 6 individuals
9/10/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from opposing counsel re revised case deadlines
9/10/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel re revised case deadlines
9/10/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from opposing counsel re revised case deadlines
9/10/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from opposing counsel re revised case deadlines
9/10/2020	MA	CC	0.3	\$725.00	\$217.50	Prep and attend call with opposing counsel
9/10/2020	SC	LA	3.9	\$240.00	\$936.00	Work on notice of filing consents, update client list
9/10/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 207-211 (Notice of Consents)
9/10/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 207-211 (Notice of Consents)
9/10/2020	SC	LA	0.3	\$240.00	\$72.00	Review ECF Nos. 207-211 (Notice of Consents)
9/10/2020	TS	SC	0.3	\$950.00	\$285.00	Meeting re Allied newsletter and survey
9/10/2020	RP	CC	0.3	\$725.00	\$217.50	Meeting re Allied newsletter and survey
9/10/2020	MA	CC	0.3	\$725.00	\$217.50	Meeting re Allied newsletter and survey
9/10/2020	SC	LA	0.3	\$240.00	\$72.00	Meeting re Allied newsletter and survey
9/10/2020	DH	LA	0.3	\$240.00	\$72.00	Meeting re Allied newsletter and survey
9/10/2020	TS	SC	0.2	\$950.00	\$190.00	Initial emails with mediator
9/10/2020	MA	CC	0.2	\$725.00	\$145.00	Initial emails with mediator
9/10/2020	MA	CC	0.2	\$725.00	\$145.00	Email OC re request for 90 depositions in advance of mediation
9/10/2020	TS	SC	0.1	\$950.00	\$95.00	Review MA email
9/10/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
9/10/2020	TS	SC	0.6	\$950.00	\$570.00	Initial call with mediator
9/10/2020	SC	LA	2.8	\$240.00	\$672.00	Manage alliedinfo, gather consent forms, return calls, emails
9/10/2020	TM	LA	8	\$240.00	\$1,920.00	Return client calls (40 assigned)
9/11/2020	TM	LA	4.5	\$240.00	\$1,080.00	Continue work on client calls
9/11/2020	SC	LA	8	\$240.00	\$1,920.00	Work on sending survey, saving results, response analysis
9/11/2020	DH	LA	6.1	\$240.00	\$1,464.00	Manage alliedinfo, gather consent forms, return calls, emails
9/11/2020	ARW	LA	4.2	\$240.00	\$1,008.00	Return calls, 25 assigned
9/11/2020	YA	LA	6.1	\$240.00	\$1,464.00	Return calls, 50 assigned
9/14/2020	SC	LA	7.2	\$240.00	\$1,728.00	Work on sending survey, saving results, response analysis

September 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/14/2020	DH	LA	6.7	\$240.00	\$1,608.00	Work on Notices of consent, update client list
9/14/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 212-216 (Notice of Consents)
9/14/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF Nos. 212-216 (Notice of Consents)
9/14/2020	SC	LA	0.3	\$240.00	\$72.00	Review ECF Nos. 212-216 (Notice of Consents)
9/14/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails re notices of deposition
9/14/2020	DMH	CC	0.3	\$725.00	\$217.50	Various emails re notices of deposition
9/14/2020	MA	CC	4.1	\$725.00	\$2,972.50	Review survey responses, initial damage model
9/14/2020	MA	CC	2.3	\$725.00	\$1,667.50	Prep and attend hearing
9/14/2020	RP	CC	1.2	\$725.00	\$870.00	Prep and attend hearing
9/14/2020	MA	CC	0.1	\$725.00	\$72.50	Email RP scheduling proposals
9/14/2020	RP	CC	0.2	\$725.00	\$145.00	Review and provide feedback to MA email
9/14/2020	DH	LA	4.5	\$240.00	\$1,080.00	Manage alliedinfo, gather consent forms, return calls, emails
9/14/2020	YA	LA	2.2	\$240.00	\$528.00	Return calls, 10 assigned, follow up
9/14/2020	TM	LA	7	\$240.00	\$1,680.00	Return calls, 40 assigned, follow up
9/15/2020	SC	LA	2.5	\$240.00	\$600.00	Manage alliedinfo, gather consent forms, return calls, emails
9/15/2020	DH	LA	1.3	\$240.00	\$312.00	Return calls, 10 assigned
9/15/2020	YA	LA	2.1	\$240.00	\$504.00	Return calls, 20 assigned
9/15/2020	TM	LA	4.5	\$240.00	\$1,080.00	Return calls, 30 assigned
9/15/2020	ARW	LA	0.8	\$240.00	\$192.00	Send consent forms through docusign
9/16/2020	TM	LA	3.5	\$240.00	\$840.00	Return calls, 20 assigned
9/16/2020	SC	LA	1.4	\$240.00	\$336.00	Manage alliedinfo, gather consent forms, return emails
9/16/2020	DH	LA	1.7	\$240.00	\$408.00	Return calls, 10 assigned
9/16/2020	YA	LA	2.1	\$240.00	\$504.00	Return calls, 15 assigned
9/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 217 (Stipulation to extend case deadlines)
9/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 217 (Stipulation to extend case deadlines)
9/16/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 217 (Stipulation to extend case deadlines), save to file
9/16/2020	SC	LA	0.1	\$240.00	\$24.00	Forward client email from alliedinfo
9/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review and respond to forwarded privileged email
9/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review forwarded privileged email
9/16/2020	MA	CC	0.1	\$725.00	\$72.50	email to expert re call
9/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
9/16/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from OC re stipulation, revise
9/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review emails between MA and OC
9/17/2020	MA	CC	0.1	\$725.00	\$72.50	Various emails with expert
9/17/2020	RP	CC	0.1	\$725.00	\$72.50	Various emails with expert
9/17/2020	SC	LA	0.1	\$725.00	\$72.50	Schedule conference call
9/18/2020	SC	LA	3	\$240.00	\$720.00	Manage alliedinfo, gather consent forms
9/18/2020	BM	LA	2.6	\$240.00	\$624.00	Respond to 26 client emails
9/18/2020	DH	LA	4.5	\$240.00	\$1,080.00	Respond to client calls, 30 assigned
9/18/2020	MA	CC	0.1	\$725.00	\$72.50	Email Phoenix re approaching notice deadline, any issues
9/18/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
9/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review email response from Phoenix
9/18/2020	RP	CC	0.1	\$725.00	\$72.50	Review email response from Phoenix
9/18/2020	MA	CC	0.4	\$725.00	\$290.00	Call with Phoenix re case status
9/18/2020	MA	CC	1	\$725.00	\$725.00	Call with expert re damage model
9/18/2020	RP	CC	1	\$725.00	\$725.00	Call with expert re damage model
9/18/2020	MA	CC	0.2	\$725.00	\$145.00	Follow up emails with expert re potential conflicts
9/18/2020	RP	CC	0.2	\$725.00	\$145.00	Follow up emails with expert re potential conflicts
9/18/2020	MA	CC	0.3	\$725.00	\$217.50	Review report from Phoenix
9/18/2020	SC	LA	0.3	\$240.00	\$72.00	Review report from Phoenix
9/20/2020	DH	LA	6.1	\$240.00	\$1,464.00	Update client list
9/21/2020	TS	SC	0.2	\$950.00	\$190.00	Various emails with mediator re outstanding data
9/21/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails with mediator re outstanding data
9/21/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails with mediator re outstanding data
9/21/2020	TS	SC	0.2	\$950.00	\$190.00	Emails with mediator assistant re upcoming mediation
9/21/2020	RP	CC	0.2	\$725.00	\$145.00	Emails with mediator assistant re upcoming mediation
9/21/2020	MA	CC	0.2	\$725.00	\$145.00	Emails with mediator assistant re upcoming mediation
9/21/2020	DMH	CC	0.2	\$725.00	\$145.00	Emails with mediator assistant re upcoming mediation
9/21/2020	MA	CC	0.2	\$725.00	\$145.00	Emails re client list
9/21/2020	DH	LA	0.2	\$240.00	\$48.00	Emails re client list
9/21/2020	TS	SC	0.1	\$950.00	\$95.00	Emails re upcoming mediation requirements
9/21/2020	SC	LA	0.1	\$240.00	\$24.00	Emails re upcoming mediation requirements
9/21/2020	ARW	LA	4.2	\$240.00	\$1,008.00	Work on responding to outstanding client voicemails
9/21/2020	TS	SC	0.3	\$950.00	\$285.00	Discussion re Def's rebuttal expert
9/21/2020	MA	CC	0.3	\$725.00	\$217.50	Discussion re Def's rebuttal expert
9/21/2020	RP	CC	0.3	\$725.00	\$217.50	Discussion re Def's rebuttal expert
9/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 222 (Order granting stipulation to extend case deadlines)

September 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
9/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 222 (Order granting stipulation to extend case deadlines)
9/22/2020	SC	LA	0.4	\$240.00	\$96.00	Review ECF No. 222 (Order granting stip to extend case deadlines), calendar
9/22/2020	MA	CC	0.4	\$725.00	\$290.00	Discussion re unsigned consent forms
9/22/2020	SC	LA	0.4	\$240.00	\$96.00	Discussion re unsigned consent forms
9/23/2020	MA	CC	0.6	\$725.00	\$435.00	Privileged client call
9/23/2020	MA	CC	1.2	\$725.00	\$870.00	Work on proposals for random sample of deponents, email to OC
9/23/2020	RP	CC	0.2	\$725.00	\$145.00	Review MA email
9/23/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails with Phoenix re last batch of consent forms
9/23/2020	RP	CC	0.2	\$725.00	\$145.00	Various emails with Phoenix re last batch of consent forms
9/23/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails with Phoenix re last batch of consent forms
9/23/2020	SC	LA	6.4	\$240.00	\$1,536.00	Work on gathering all remaining consent forms, exhibits, and filing
9/23/2020	DH	LA	3.2	\$240.00	\$768.00	Assist Susan in gathering consent forms, updating client list
9/23/2020	RP	CC	0.3	\$725.00	\$217.50	Review ECF Nos. 223-229 (consent forms)
9/23/2020	MA	CC	0.3	\$725.00	\$217.50	Review ECF Nos. 223-229 (consent forms)
9/23/2020	SC	LA	0.6	\$240.00	\$144.00	Review ECF Nos. 223-229 (consent forms), save to file
9/23/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re random sample
9/23/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from OC re random sample
9/24/2020	SC	LA	0.2	\$240.00	\$48.00	Emails re process now that notice period ended
9/24/2020	MA	CC	0.2	\$725.00	\$145.00	Emails re process now that notice period ended
9/24/2020	MA	CC	0.4	\$725.00	\$290.00	Work on mass email to plaintiffs who will be deposed
9/24/2020	SC	LA	0.5	\$240.00	\$120.00	Work on consent forms and filing
9/24/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 230 (consent forms)
9/24/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 230 (consent forms)
9/24/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 230 (consent forms), save to file
9/24/2020	SC	LA	0.5	\$240.00	\$120.00	Work on scheduling client calls
9/24/2020	RP	CC	0.7	\$725.00	\$507.50	Conference call with Phoenix re remaining consent forms, issues
9/24/2020	MA	CC	0.7	\$725.00	\$507.50	Conference call with Phoenix re remaining consent forms, issues
9/25/2020	SC	LA	2.1	\$240.00	\$504.00	Gather consent forms and prepare filing
9/25/2020	DH	LA	3.4	\$240.00	\$816.00	Assist Susan in gathering consent forms, updating client list
9/25/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 231, 232 (consent forms)
9/25/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 231, 232 (consent forms)
9/25/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF No. 231, 232 (consent forms), save to file
9/25/2020	SC	LA	6.5	\$240.00	\$1,560.00	Work on clearing out alliedinfo box, return client calls, emails
9/25/2020	MA	CC	8	\$725.00	\$5,800.00	Client interviews in advance of depositions
9/28/2020	MA	CC	0.3	\$240.00	\$72.00	Draft revised language for phone box
9/28/2020	SC	LA	4.5	\$240.00	\$1,080.00	Work on clearing out alliedinfo box, return client calls, emails
9/28/2020	SC	LA	0.4	\$240.00	\$96.00	Work on gathering consent forms, update client list
9/28/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 233 (consent forms)
9/28/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 233 (consent forms)
9/28/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 233 (consent forms), save to file
9/28/2020	CE	LA	6.7	\$240.00	\$1,608.00	Client interviews in advance of depositions
9/28/2020	MA	CC	1.7	\$240.00	\$408.00	Work on client notes from interviews
9/28/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from OC re deposition scheduling
9/30/2020	MA	CC	1	\$725.00	\$725.00	Deposition strategy meeting
9/30/2020	RP	CC	1	\$725.00	\$725.00	Deposition strategy meeting
9/30/2020	TS	SC	1	\$950.00	\$950.00	Deposition strategy meeting
9/30/2020	MA	CC	1.1	\$725.00	\$797.50	Document review in preparation for Calhoun prep
9/30/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, John Calhoun, discussion with co-counsel
9/30/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, John Calhoun, discussion with co-counsel
9/30/2020	MA	CC	0.9	\$725.00	\$652.50	Document review in preparation for Tinsley prep
9/30/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Christina Tinsley, discussion with co-counsel
9/30/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Christina Tinsley, discussion with co-counsel
\$119,243.50						

October 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
10/1/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from OC re scheduling depositions, brief discussion with RP, TS
10/1/2020	RP	CC	0.2	\$725.00	\$145.00	Discuss response to email with MA
10/1/2020	TS	SC	0.1	\$950.00	\$95.00	Discuss response to email with MA
10/1/2020	MA	CC	0.3	\$725.00	\$217.50	Draft response to OC email
10/1/2020	CE	LA	0.5	\$240.00	\$120.00	Client calls re scheduling depositions
10/1/2020	SC	LA	0.3	\$240.00	\$72.00	Call client to schedule depo prep, answer questions (Capitano)
10/1/2020	SC	LA	0.2	\$240.00	\$48.00	Call client to schedule depo prep, answer questions (Pace)
10/1/2020	MA	CC	0.1	\$725.00	\$72.50	Forward stipulated amended scheduling order to RP
10/1/2020	MA	CC	0.1	\$725.00	\$72.50	Email court reporter re share Zoom information with clients
10/1/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to OC email re deposition schedule
10/1/2020	SC	LA	0.9	\$240.00	\$216.00	Work with clients on discovery responses, draft for MA approval
10/1/2020	MA	CC	0.3	\$725.00	\$217.50	Review discovery responses, send to opposing counsel
10/2/2020	MA	CC	0.3	\$725.00	\$217.50	Review email from OC with data for damage model, initial analysis
10/2/2020	RP	CC	0.3	\$725.00	\$217.50	Review email from OC with data for damage model, initial analysis
10/2/2020	TS	SC	0.2	\$950.00	\$190.00	Review email from OC with data for damage model
10/2/2020	MA	CC	1	\$725.00	\$725.00	Deposition of John Calhoun
10/2/2020	TS	SC	1.5	\$950.00	\$1,425.00	Deposition of John Calhoun
10/2/2020	MA	CC	1.5	\$725.00	\$1,087.50	Deposition of John Calhoun
10/2/2020	RP	CC	1.5	\$725.00	\$1,087.50	Deposition of Christina Tinsley
10/2/2020	TS	SC	1.5	\$950.00	\$1,425.00	Deposition of Christina Tinsley
10/2/2020	MA	CC	1.5	\$725.00	\$1,087.50	Deposition of Christina Tinsley
10/2/2020	RP	CC	0.1	\$725.00	\$72.50	Email court reporter re read and sign for Calhoun
10/2/2020	SC	LA	0.3	\$240.00	\$72.00	Call client to schedule depo prep, answer questions (Thompson)
10/2/2020	SC	LA	0.3	\$240.00	\$72.00	Draft and file notice of filing consent to join forms (ECF No. 234)
10/2/2020	SC	LA	0.1	\$240.00	\$24.00	Email to MA with questions
10/2/2020	MA	LA	0.1	\$725.00	\$72.50	Approve for filing
10/2/2020	MA	CC	0.1	\$725.00	\$72.50	Review filing (ECF No. 234)
10/2/2020	RP	CC	0.1	\$725.00	\$72.50	Review filing (ECF No. 234)
10/2/2020	SC	LA	0.1	\$240.00	\$24.00	Review filing (ECF No. 234), save to file
10/2/2020	CE	LA	4.2	\$240.00	\$1,008.00	Compile data from client calls re deposition
10/2/2020	MA	CC	0.1	\$725.00	\$72.50	Email OC additional availability for deposition (Thompson)
10/3/2020	MA	CC	4.7	\$725.00	\$3,407.50	Work to identify ambiguous Opt-in plaintiffs
10/4/2020	MA	CC	0.8	\$725.00	\$580.00	Document review in preparation for Thompson prep
10/4/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Conan Thompson, discussion with co-counsel
10/4/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Conan Thompson, discussion with co-counsel
10/5/2020	SC	LA	0.9	\$240.00	\$216.00	Work with clients on discovery responses, draft for MA approval
10/5/2020	MA	CC	0.3	\$725.00	\$217.50	Approve discovery responses, and send to OC
10/5/2020	MA	CC	0.4	\$725.00	\$290.00	Research and send Tentative in Hakeem to RP
10/5/2020	MA	CC	0.6	\$725.00	\$435.00	Document review in preparation for Capitano prep
10/5/2020	RP	CC	0.8	\$725.00	\$580.00	Review Tentative in Hakeem re Toure motion
10/5/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Sam Capitano, discussion with co-counsel
10/5/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Sam Capitano, discussion with co-counsel
10/5/2020	MA	CC	0.5	\$725.00	\$362.50	Document review in preparation for Pace prep
10/5/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Kurt Pace, discussion with co-counsel
10/5/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Kurt Pace, discussion with co-counsel
10/5/2020	SC	LA	0.2	\$240.00	\$48.00	Scheduling and calendaring deposition (Capitano)
10/5/2020	SC	LA	0.2	\$240.00	\$48.00	Scheduling and calendaring deposition (Pace)
10/5/2020	RP	CC	0.1	\$725.00	\$72.50	Email MA question re random selection of deponents
10/5/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to RP Email
10/6/2020	MA	CC	1.1	\$725.00	\$797.50	Review client notes, instructions to SC to schedule additional depositions
10/6/2020	SC	LA	0.8	\$240.00	\$192.00	Work on scheduling additional depositions
10/6/2020	RP	CC	1	\$725.00	\$725.00	Deposition of Sam Capitano
10/6/2020	TS	SC	1	\$950.00	\$950.00	Deposition of Sam Capitano
10/6/2020	MA	CC	1	\$725.00	\$725.00	Deposition of Sam Capitano
10/6/2020	RP	CC	2	\$725.00	\$1,450.00	Deposition of Kurt Pace
10/6/2020	MA	CC	2	\$725.00	\$1,450.00	Deposition of Kurt Pace
10/6/2020	MA	CC	0.2	\$725.00	\$145.00	Review and respond to email from OC re ambiguous clients
10/6/2020	MA	CC	2.3	\$725.00	\$1,667.50	Work in excel to provide response on ambiguous clients
10/6/2020	SC	LA	0.3	\$240.00	\$72.00	Work on scheduling and calendaring depositions
10/7/2020	RP	CC	3	\$725.00	\$2,175.00	Deposition of Conan Thompson
10/7/2020	SC	LA	0.3	\$240.00	\$72.00	Work to get OC access to Allied Disambiguation spreadsheet
10/7/2020	SC	LA	0.5	\$240.00	\$120.00	Privileged client call
10/7/2020	MA	CC	0.5	\$725.00	\$362.50	Follow up re privileged client call
10/7/2020	SC	LA	0.3	\$240.00	\$72.00	Work on additional consent forms, file
10/7/2020	MA	CC	0.2	\$725.00	\$145.00	Review additional consent forms, instructions, approve for filing

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
10/8/2020	MA	CC	0.5	\$725.00	\$362.50	Document review in preparation for Randolph prep
10/8/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Brittani Randolph, discussion with co-counsel
10/8/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Brittani Randolph, discussion with co-counsel
10/8/2020	MA	CC	0.5	\$725.00	\$362.50	Document review in preparation for Hewitt prep
10/8/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Meyloni Hewitt, discussion with co-counsel
10/8/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Meyloni Hewitt, discussion with co-counsel
10/8/2020	SC	LA	1.8	\$240.00	\$432.00	Work with clients on discovery responses, draft for MA approval
10/8/2020	MA	CC	0.4	\$725.00	\$290.00	Review responses for Randolph, Hewitt, approve for email to opposing counsel
10/9/2020	MA	CC	0.1	\$725.00	\$72.50	Email discovery responses to OC
10/9/2020	TS	SC	1.5	\$950.00	\$1,425.00	Deposition of Meyloni Hewitt
10/12/2020	MA	CC	0.5	\$725.00	\$362.50	Document review in preparation for Jaser prep
10/12/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Jack Jaser, discussion with co-counsel
10/12/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Jack Jaser, discussion with co-counsel
10/13/2020	MA	CC	2	\$725.00	\$1,450.00	Deposition of Jack Jaser
10/13/2020	MA	CC	0.5	\$725.00	\$362.50	Document review in preparation for Martinez prep
10/13/2020	RP	CC	1	\$725.00	\$725.00	Deposition preparation, Christopher Martinez, discussion with co-counsel
10/13/2020	MA	CC	1	\$725.00	\$725.00	Deposition preparation, Christopher Martinez, discussion with co-counsel
10/14/2020	SC	LA	0.1	\$240.00	\$24.00	Work on scheduling Randolph deposition with Zoom from court reporter
10/14/2020	SC	LA	0.1	\$240.00	\$24.00	Work on scheduling Martinez deposition with Zoom from court reporter
10/14/2020	MA	CC	2	\$725.00	\$1,450.00	Deposition of Brittani Randolph
10/14/2020	MA	CC	1.5	\$725.00	\$1,087.50	Deposition of Christopher Martinez
10/14/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from mediator (Cohn) re setting call to prepare for mediation
10/14/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from mediator (Cohn) re setting call to prepare, respond
10/14/2020	TS	SC	0.1	\$950.00	\$95.00	Review response from OC
10/14/2020	MA	CC	0.1	\$725.00	\$72.50	Review response from OC
10/14/2020	TS	CC	0.1	\$950.00	\$95.00	Review response from mediator, respond
10/14/2020	MA	CC	0.1	\$725.00	\$72.50	Review response from mediator, TS response
10/14/2020	MA	CC	0.1	\$725.00	\$72.50	Review Zoom invitation, forward to staff with instructions
10/15/2020	TS	SC	0.1	\$950.00	\$95.00	Request reschedule with mediator
10/15/2020	MA	CC	0.1	\$725.00	\$72.50	Review TS email
10/15/2020	RP	CC	0.1	\$725.00	\$72.50	Forward Calhoun transcript to SC to save
10/15/2020	SC	LA	0.2	\$240.00	\$48.00	Save Calhoun transcript, email read and sign to Calhoun
10/15/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Calhoun)
10/15/2020	RP	CC	0.1	\$725.00	\$72.50	Forward Tinsley transcript to SC to save
10/15/2020	SC	LA	0.2	\$240.00	\$48.00	Save Tinsley transcript, email read and sign to Tinsley
10/15/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Tinsley)
10/19/2020	RP	CC	0.1	\$725.00	\$72.50	Forward Thompson transcript to SC to save
10/19/2020	SC	LA	0.1	\$240.00	\$24.00	Save Thompson transcript, email read and sign to Thompson
10/19/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Thompson)
10/19/2020	TS	SC	0.1	\$950.00	\$95.00	Review Zoom invitation from mediator Cohn
10/19/2020	MA	CC	0.1	\$725.00	\$72.50	Review Zoom invitation from mediator Cohn, calendaring instructions to SC
10/19/2020	MA	CC	7.2	\$725.00	\$5,220.00	Work on damage model
10/20/2020	MA	CC	8.1	\$725.00	\$5,872.50	further work on damage model
10/20/2020	MA	CC	0.5	\$725.00	\$362.50	Draft stipulation re e-service
10/21/2020	MA	CC	6.5	\$725.00	\$4,712.50	further work on damage model
10/21/2020	JF	CC	0.1	\$725.00	\$72.50	Email MA re case status
10/21/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to JF email re case status
10/21/2020	DMH	CC	0.1	\$725.00	\$72.50	Review emails between JF and MA
10/21/2020	MMB	AT	0.1	\$450.00	\$45.00	Review emails between JF and MA
10/21/2020	TS	SC	0.3	\$950.00	\$285.00	Analysis and email MA question re case value in Hakeem
10/21/2020	MA	CC	0.5	\$725.00	\$362.50	Analysis, email response to TS
10/22/2020	TS	SC	2.5	\$950.00	\$2,375.00	Joint prep, attend conference call with mediator
10/22/2020	MA	CC	2.5	\$725.00	\$1,812.50	Joint prep, attend conference call with mediator
10/22/2020	RP	CC	2.5	\$725.00	\$1,812.50	Joint prep, attend conference call with mediator
10/22/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from OC re stipulation, approve for filing
10/22/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re stipulation
10/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from OC re stipulation
10/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review filing ECF No. 237 (Stipulation)
10/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review filing ECF No. 237 (Stipulation)
10/22/2020	SC	LA	0.1	\$240.00	\$24.00	Review filing ECF No. 237 (Stipulation), save to file
10/23/2020	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to order deposition
10/23/2020	SC	LA	0.2	\$240.00	\$48.00	Work with court reporter to obtain transcript
10/23/2020	SC	LA	0.2	\$240.00	\$48.00	Various emails re privileged client issue
10/23/2020	MA	CC	0.2	\$725.00	\$145.00	Various emails re privileged client issue
10/23/2020	RP	CC	0.1	\$725.00	\$72.50	Various emails re privileged client issue

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
10/24/2020	MA	CC	0.2	\$725.00	\$145.00	Review emails from OC unilaterally noticing additional depositions
10/24/2020	RP	CC	0.2	\$725.00	\$145.00	Review emails from OC unilaterally noticing additional depositions
10/24/2020	SC	LA	0.5	\$240.00	\$120.00	Save notices of deposition, begin contacting opt-in plaintiffs
10/25/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from Phoenix re additional consent forms
10/25/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from Phoenix re additional consent forms
10/25/2020	SC	LA	0.4	\$240.00	\$96.00	Review email from Phoenix re additional consent forms, process for filing
10/26/2020	SC	LA	0.2	\$240.00	\$48.00	Email mediation agreement to mediator
10/26/2020	RP	CC	0.1	\$725.00	\$72.50	Forward Pace transcript to SC, instructions to save
10/26/2020	SC	LA	0.2	\$240.00	\$48.00	Save Pace transcript, email read and sign to Pace
10/26/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Pace)
10/26/2020	RP	CC	0.1	\$725.00	\$72.50	Forward Capitano transcript to SC, instructions to save
10/26/2020	SC	LA	0.2	\$240.00	\$48.00	Save Capitano transcript, email read and sign to Capitano
10/26/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Capitano)
10/26/2020	SC	LA	0.1	\$240.00	\$24.00	Calendar meeting with mediator
10/27/2020	TS	SC	1.2	\$950.00	\$1,140.00	Joint prep, further conference with mediator
10/27/2020	MA	CC	1.2	\$725.00	\$870.00	Joint prep, further conference with mediator
10/28/2020	MA	CC	7.1	\$725.00	\$5,147.50	Work on mediation statement
10/28/2020	MA	CC	0.1	\$725.00	\$72.50	Forward Randolph transcript to SC, instructions to save
10/28/2020	SC	LA	0.2	\$240.00	\$48.00	Save Randolph transcript, email read and sign to Randolph
10/28/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Randolph)
10/29/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC with additional data re settlement
10/29/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from OC with additional data re settlement
10/29/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from OC with additional data re settlement
10/29/2020	MA	CC	6.5	\$725.00	\$4,712.50	Work on mediation statement
10/30/2020	MA	CC	5.1	\$725.00	\$3,697.50	Work on mediation statement
10/30/2020	TS	SC	0.5	\$950.00	\$475.00	final discussion with mediator
10/30/2020	RP	CC	0.5	\$725.00	\$362.50	final discussion with mediator
10/30/2020	MA	CC	0.5	\$725.00	\$362.50	final discussion with mediator
10/30/2020	TS	SC	0.5	\$950.00	\$475.00	pre-mediation strategy session
10/30/2020	RP	CC	0.5	\$725.00	\$362.50	pre-mediation strategy session
10/30/2020	MA	CC	0.5	\$725.00	\$362.50	pre-mediation strategy session
10/30/2020	MA	CC	0.1	\$725.00	\$72.50	Email Jaser transcript to SC, instructions to save
10/30/2020	SC	LA	0.2	\$240.00	\$48.00	Save Jaser transcript, email read and sign to Jaser
10/30/2020	MA	CC	0.5	\$725.00	\$362.50	Draft depo summary (Jaser)
10/31/2020	MA	CC	0.2	\$725.00	\$145.00	Review and email additional materials to mediator
10/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from mediator
10/31/2020	MA	CC	6.5	\$725.00	\$4,712.50	revise damage model
						\$97,968.50

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/1/2020	MA	CC	4.8	\$725.00	\$3,480.00	Further work on damage model spreadsheets
11/1/2020	RP	CC	1	\$725.00	\$725.00	Review MA spreadsheets, discuss in preparation for mediation
11/1/2020	MA	CC	1	\$725.00	\$725.00	Review MA spreadsheets, discuss in preparation for mediation
11/1/2020	TS	SC	1	\$950.00	\$950.00	Review MA spreadsheets, discuss in preparation for mediation
11/2/2020	MA	CC	10.3	\$725.00	\$7,467.50	Prep and attend mediation with Lynn Cohn
11/2/2020	TS	SC	8.1	\$950.00	\$7,695.00	Prep and attend mediation with Lynn Cohn
11/2/2020	DMH	CC	6.5	\$725.00	\$4,712.50	Prep and attend mediation with Lynn Cohn
11/2/2020	RP	CC	6.5	\$725.00	\$4,712.50	Prep and attend mediation with Lynn Cohn
11/2/2020	SC	LA	10	\$240.00	\$2,400.00	Support during mediation
11/5/2020	MA	CC	0.1	\$725.00	\$72.50	Receive invoice for Randolph depo, forward to SC for payment
11/5/2020	SC	LA	0.3	\$240.00	\$72.00	handle payment for Randolph depo
11/5/2020	MA	CC	0.1	\$725.00	\$72.50	email to court reporter re copy SC
11/5/2020	RP	CC	0.1	\$725.00	\$72.50	forward invoices for depositions to MA, DH, SC
11/5/2020	SC	LA	0.2	\$240.00	\$48.00	handle payment for additional depositions
11/9/2020	TS	SC	0.5	\$950.00	\$475.00	Case strategy session
11/9/2020	MA	CC	0.5	\$725.00	\$362.50	Case strategy session
11/9/2020	RP	CC	0.5	\$725.00	\$362.50	Case strategy session
11/9/2020	MA	CC	3.2	\$725.00	\$2,320.00	Draft first RFP, Second Ex Parte App re depositions
11/9/2020	TS	SC	0.3	\$950.00	\$285.00	Review various emails between MA and OC
11/9/2020	RP	CC	0.3	\$725.00	\$217.50	Review various emails between MA and OC
11/9/2020	SC	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/9/2020	DMH	CC	0.3	\$725.00	\$217.50	Review various emails between MA and OC
11/9/2020	TM	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/9/2020	CE	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/9/2020	SC	LA	0.1	\$240.00	\$24.00	Email MA question re outgoing response in alliedinfo
11/9/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to SC email
11/9/2020	MA	CC	0.6	\$725.00	\$435.00	Further emails with OC re ex parte
11/12/2020	MA	CC	0.1	\$725.00	\$72.50	Email to SC re tailoring prior discovery requests to deponents
11/12/2020	SC	LA	2.1	\$240.00	\$504.00	Work on discovery requests
11/13/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from court reporter re settting Andrade deposition
11/13/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Andrade deposition
11/13/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Andrade deposition
11/13/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Andrade deposition, calendar
11/13/2020	CE	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Andrade deposition
11/13/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Andrade deposition
11/13/2020	TM	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Andrade deposition, calendar
11/13/2020	RP	CC	0.1	\$725.00	\$72.50	Email MA re unilaterally set depositions
11/13/2020	MA	CC	0.1	\$725.00	\$72.50	Respond to RP email
11/13/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from court reporter re settting Bennett deposition
11/13/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Bennett deposition
11/13/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Bennett deposition
11/13/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Bennett deposition, calendar
11/13/2020	CE	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Bennett deposition
11/13/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Bennett deposition
11/13/2020	TM	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Bennett deposition, calendar
11/13/2020	SC	LA	0.2	\$240.00	\$48.00	Email MA re deposition settings
11/13/2020	MA	CC	0.2	\$725.00	\$145.00	Respond to SC email
11/16/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails with OC re deposition settings
11/16/2020	TS	SC	0.3	\$950.00	\$285.00	Review various emails between MA and OC
11/16/2020	RP	CC	0.3	\$725.00	\$217.50	Review various emails between MA and OC
11/16/2020	SC	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/16/2020	DMH	CC	0.3	\$725.00	\$217.50	Review various emails between MA and OC
11/16/2020	TM	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/16/2020	CE	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/16/2020	MA	CC	0.4	\$725.00	\$290.00	Case strategy session re depositions
11/16/2020	TS	SC	0.4	\$950.00	\$380.00	Case strategy session re depositions
11/16/2020	RP	CC	0.4	\$725.00	\$290.00	Case strategy session re depositions
11/16/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from court reporter re settting Brown deposition
11/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Brown deposition
11/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Brown deposition
11/16/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Brown deposition, calendar
11/16/2020	CE	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Brown deposition
11/16/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Brown deposition
11/16/2020	TM	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Brown deposition, calendar
11/16/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from court reporter re settting Black deposition

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Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Black deposition
11/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Black deposition
11/16/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Black deposition, calendar
11/16/2020	CE	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Black deposition
11/16/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Black deposition
11/16/2020	TM	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Black deposition, calendar
11/16/2020	MA	CC	0.4	\$725.00	\$290.00	Review arbitration agreements from opposing counsel
11/16/2020	RP	CC	0.4	\$725.00	\$290.00	Review arbitration agreements from opposing counsel
11/16/2020	MA	CC	1.2	\$725.00	\$870.00	Finalize Second Ex Parte
11/16/2020	RP	CC	0.4	\$725.00	\$290.00	Review Second Ex Parte
11/16/2020	MA	CC	0.6	\$725.00	\$435.00	Final revisions, send to SC for filing
11/16/2020	SC	LA	0.4	\$240.00	\$96.00	Work on exhibits
11/16/2020	SC	LA	0.2	\$240.00	\$48.00	File Second Ex Parte, submit proposed order
11/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 238 (Second Ex Parte)
11/16/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 238 (Second Ex Parte)
11/16/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 238 (Second Ex Parte), save to file
11/17/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from court reporter re settting Chand deposition
11/17/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Chand deposition
11/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Chand deposition
11/17/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Chand deposition, calendar
11/17/2020	CE	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Chand deposition
11/17/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Chand deposition
11/17/2020	TM	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Chand deposition, calendar
11/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review email re Jaser read and sign
11/17/2020	SC	LA	0.1	\$240.00	\$24.00	Review email re Jaser read and sign, save to file
11/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review email re Tinsley read and sign
11/17/2020	SC	LA	0.1	\$240.00	\$24.00	Review email re Tinsley read and sign, save to file
11/17/2020	MA	CC	0.1	\$725.00	\$72.50	Review email re Pace read and sign
11/17/2020	SC	LA	0.1	\$240.00	\$24.00	Review email re Paceread and sign, save to file
11/17/2020	MA	CC	0.9	\$725.00	\$652.50	Review ECF No. 239 (Def's Oppo to Second Ex Parte)
11/17/2020	RP	CC	0.9	\$725.00	\$652.50	Review ECF No. 239 (Def's Oppo to Second Ex Parte)
11/17/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF No. 239 (Def's Oppo to Second Ex Parte), save to file
11/18/2020	TS	SC	0.1	\$950.00	\$95.00	Review email from court reporter re settting Freeman deposition
11/18/2020	RP	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Freeman deposition
11/18/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Freeman deposition
11/18/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Freeman deposition, calendar
11/18/2020	CE	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Freeman deposition
11/18/2020	DMH	CC	0.1	\$725.00	\$72.50	Review email from court reporter re settting Freeman deposition
11/18/2020	TM	LA	0.1	\$240.00	\$24.00	Review email from court reporter re settting Freeman deposition, calendar
11/18/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails with OC re stipulation
11/18/2020	TS	SC	0.3	\$950.00	\$285.00	Review various emails between MA and OC
11/18/2020	RP	CC	0.3	\$725.00	\$217.50	Review various emails between MA and OC
11/18/2020	SC	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/18/2020	DMH	CC	0.3	\$725.00	\$217.50	Review various emails between MA and OC
11/18/2020	TM	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/18/2020	CE	LA	0.3	\$240.00	\$72.00	Review various emails between MA and OC
11/18/2020	RP	CC	0.2	\$725.00	\$145.00	Review stipulation, red line
11/18/2020	MA	CC	0.6	\$725.00	\$435.00	Review email from Bruce Murray, final judgment and notice of judgment (Hakeem)
11/18/2020	RP	CC	0.4	\$725.00	\$290.00	Review email from Bruce Murray, final judgment and notice of judgment (Hakeem)
11/18/2020	TS	CC	0.5	\$950.00	\$475.00	Review ECF No. 240 (Order denying Second Ex Parte)
11/18/2020	MA	CC	0.5	\$725.00	\$362.50	Review ECF No. 240 (Order denying Second Ex Parte)
11/18/2020	RP	CC	0.5	\$725.00	\$362.50	Review ECF No. 240 (Order denying Second Ex Parte)
11/18/2020	SC	LA	0.2	\$240.00	\$48.00	Review ECF no. 240 (Order denying Second Ex Parte), save to file
11/19/2020	TS	SC	0.2	\$950.00	\$190.00	Review emails from court reporter re settting Holmes, Hypolite deposition
11/19/2020	RP	CC	0.2	\$725.00	\$145.00	Review emails from court reporter re settting Holmes, Hypolite deposition
11/19/2020	MA	CC	0.2	\$725.00	\$145.00	Review emails from court reporter re settting Holmes, Hypolite deposition
11/19/2020	SC	LA	0.2	\$240.00	\$48.00	Review emails from CR re settting Holmes, Hypolite deposition, calendar
11/19/2020	CE	LA	0.2	\$240.00	\$48.00	Review emails from court reporter re settting Holmes, Hypolite deposition
11/19/2020	DMH	CC	0.2	\$725.00	\$145.00	Review emails from court reporter re settting Holmes, Hypolite deposition
11/19/2020	TM	LA	0.2	\$240.00	\$48.00	Review emails from CR re settting Holmes, Hypolite deposition, calendar
11/19/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from OC, review stipulation edits
11/19/2020	TS	SC	0.1	\$950.00	\$95.00	Review emails between MA and OC
11/19/2020	RP	CC	0.1	\$725.00	\$72.50	Review emails between MA and OC
11/19/2020	SC	LA	0.1	\$240.00	\$24.00	Review emails between MA and OC
11/19/2020	DMH	CC	0.1	\$725.00	\$72.50	Review emails between MA and OC

November 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
11/19/2020	TM	LA	0.1	\$240.00	\$24.00	Review emails between MA and OC
11/19/2020	CE	LA	0.1	\$240.00	\$24.00	Review emails between MA and OC
11/19/2020	TS	SC	0.2	\$950.00	\$190.00	Case strategy meeting re case costs
11/19/2020	RP	CC	0.2	\$725.00	\$145.00	Case strategy meeting re case costs
11/19/2020	MA	CC	0.2	\$725.00	\$145.00	Case strategy meeting re case costs
11/20/2020	RP	CC	0.3	\$725.00	\$217.50	Further review stipulation
11/20/2020	TS	SC	0.4	\$950.00	\$380.00	Prep and attend call with opposing counsel
11/20/2020	RP	CC	0.4	\$725.00	\$290.00	Prep and attend call with opposing counsel
11/20/2020	MA	CC	0.4	\$725.00	\$290.00	Prep and attend call with opposing counsel
11/20/2020	RP	CC	0.2	\$725.00	\$145.00	Additional emails with opposing counsel
11/20/2020	MA	CC	0.2	\$725.00	\$145.00	Additional emails with opposing counsel
11/22/2020	RP	CC	0.3	\$725.00	\$217.50	Final review stipulation, various emails with opposing counsel
11/22/2020	MA	CC	0.3	\$725.00	\$217.50	Final review stipulation, various emails with opposing counsel
11/22/2020	TS	SC	0.1	\$950.00	\$95.00	Review emails between MA and OC
11/22/2020	SC	LA	0.1	\$240.00	\$24.00	Review emails between MA and OC
11/22/2020	DMH	CC	0.1	\$725.00	\$72.50	Review emails between MA and OC
11/22/2020	TM	LA	0.1	\$240.00	\$24.00	Review emails between MA and OC
11/22/2020	CE	LA	0.1	\$240.00	\$24.00	Review emails between MA and OC
11/22/2020	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 241 (Stipulation)
11/22/2020	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 241 (Stipulation)
11/22/2020	SC	LA	0.1	\$240.00	\$24.00	Review ECF No. 241 (Stipulation), save to file
11/23/2020	MA	CC	0.1	\$725.00	\$72.50	Forward random number generator email to RP
11/23/2020	RP	CC	0.1	\$725.00	\$72.50	Review MA email
11/24/2020	MA	CC	0.1	\$725.00	\$72.50	Forward invoice for depositions to SC
11/24/2020	SC	LA	0.1	\$240.00	\$24.00	Process payment for depositions
11/30/2020	TS	SC	0.5	\$950.00	\$475.00	Follow up call with mediator Lynn Cohn
11/30/2020	MA	CC	0.5	\$725.00	\$362.50	Follow up call with mediator Lynn Cohn
\$56,025.50						

December 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
12/1/2020	MA	CC	0.7	\$725.00	\$507.50	Follow up call with mediator
12/1/2020	TS	SC	0.7	\$950.00	\$665.00	Follow up call with mediator
12/3/2020	SC	LA	0.4	\$240.00	\$96.00	Call with client, provide status update
12/3/2020	MA	LA	0.1	\$725.00	\$72.50	Review email re Randolph read and sign
12/3/2020	SC	CC	0.1	\$240.00	\$24.00	Review email re Randolph read and sign, save to file
12/4/2020	YA	LA	0.1	\$240.00	\$24.00	Ask for status update for client
12/4/2020	MA	CC	0.1	\$725.00	\$72.50	Draft update message for clients
12/4/2020	SC	LA	0.1	\$240.00	\$24.00	Additional information for status update message
12/7/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Watson deposition
12/7/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Watson depo, calendar
12/7/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Watkins deposition
12/7/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Watkins depo, calendar
12/8/2020	MA	CC	0.4	\$725.00	\$290.00	Case strategy discussion re mass arbitration
12/8/2020	RP	CC	0.4	\$725.00	\$290.00	Case strategy discussion re mass arbitration
12/8/2020	MA	CC	0.3	\$725.00	\$217.50	Various emails scheduling conference call re case status
12/8/2020	RP	CC	0.3	\$725.00	\$217.50	Various emails scheduling conference call re case status
12/8/2020	DMH	CC	0.3	\$725.00	\$217.50	Various emails scheduling conference call re case status
12/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Stachula deposition
12/8/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Stachula depo, calendar
12/8/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Torain deposition
12/8/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Torain depo, calendar
12/9/2020	MA	CC	0.2	\$725.00	\$145.00	Review Defendant's Responses to Plaintiff's RFPs, instructions to save
12/9/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Townsend deposition
12/9/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Townsend depo, calendar
12/9/2020	MA	CC	0.6	\$725.00	\$435.00	Prep and attend conference call with OC re depositions
12/9/2020	MA	CC	0.2	\$725.00	\$145.00	Review summary email from OC re depositions, forward to RP, SC
12/9/2020	RP	CC	0.2	\$725.00	\$145.00	Review summary email from OC re depositions
12/9/2020	SC	LA	0.1	\$240.00	\$24.00	Review summary email from OC re depositions, save to file
12/10/2020	SC	LA	5	\$240.00	\$1,200.00	Document review re arbitration agreements, organize spreadsheet
12/10/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to email from OC re confirm depo plan
12/11/2020	MA	CC	0.6	\$725.00	\$435.00	Case strategy conference re mass arbitration
12/11/2020	RP	CC	0.6	\$725.00	\$435.00	Case strategy conference re mass arbitration
12/11/2020	DMH	CC	0.6	\$725.00	\$435.00	Case strategy conference re mass arbitration
12/11/2020	MA	CC	0.4	\$725.00	\$290.00	Client call
12/11/2020	MA	CC	0.2	\$725.00	\$145.00	Review email from OC re deponents arbitration status
12/11/2020	RP	CC	0.2	\$725.00	\$145.00	Review email from OC re deponents arbitration status, instructions to staff
12/11/2020	SC	LA	0.1	\$725.00	\$72.50	Save email to file
12/15/2020	MA	CC	0.1	\$725.00	\$72.50	Review additional email from OC re scheduling depositions
12/15/2020	RP	CC	0.1	\$725.00	\$72.50	Review additional email from OC re scheduling depositions
12/15/2020	SC	LA	0.1	\$240.00	\$24.00	Review additional email from OC re scheduling depositions
12/15/2020	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to contact client for depo prep
12/15/2020	SC	LA	0.3	\$240.00	\$72.00	client contact, schedule depo prep
12/15/2020	MA	CC	0.5	\$725.00	\$362.50	Initial client depo prep (Zamudio)
12/15/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to emails from OC re proposed deposition dates
12/15/2020	RP	CC	0.1	\$725.00	\$72.50	Review emails from OC re proposed deposition dates
12/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re additional dates for Zamudio deposition
12/16/2020	MA	CC	0.4	\$725.00	\$290.00	Case strategy conference re additional depositions
12/16/2020	RP	CC	0.4	\$725.00	\$290.00	Case strategy conference re additional depositions
12/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Zamudio deposition
12/16/2020	SC	LA	0.1	\$240.00	\$24.00	Update calendar with Zamudio deposition information
12/16/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Buckham deposition
12/16/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Buckham depo, calendar
12/17/2020	MA	CC	0.4	\$725.00	\$290.00	Initial review of discovery responses re Eric Zamudio
12/17/2020	SC	LA	2.1	\$240.00	\$504.00	Save discovery responses re Zamudio to file, initial document review, index
12/17/2020	MA	CC	0.2	\$725.00	\$145.00	Review amended notices of deposition
12/17/2020	SC	LA	0.7	\$240.00	\$168.00	Review am notices of deposition, client contact
12/18/2020	MA	CC	0.2	\$725.00	\$145.00	Various email with OC re rescheduling depositions
12/18/2020	MA	CC	0.5	\$725.00	\$362.50	Initial call with Pawel Bak re deposition, privileged discussion
12/18/2020	MA	CC	0.5	\$725.00	\$362.50	Initial call with Anthony Marquez re depo, privileged discussion
12/21/2020	MA	CC	2	\$725.00	\$1,450.00	Review Bruce Murray filing in Hakeem re renewed motion to vacate
12/21/2020	MA	CC	0.3	\$725.00	\$217.50	Review revised Bruce Murray filing
12/21/2020	RP	CC	1.1	\$725.00	\$797.50	Review Toure Motion in Hakeem
12/22/2020	MA	CC	0.5	\$725.00	\$362.50	Initial review of discovery responses re Nancy Watkins
12/22/2020	SC	LA	1.1	\$240.00	\$264.00	Save discovery responses re Watkins to file, initial document review, index
12/22/2020	SC	LA	0.1	\$240.00	\$24.00	Forward email from allied info re retaliation

December 2020

Date	Timekeeper	Role	Hours	Rate	Fee	Description
12/23/2020	MA	CC	0.1	\$725.00	\$72.50	Review and respond to OC request for update re Watkins depo
12/30/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Duncan deposition
12/30/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Duncan depo, calendar
12/30/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Graham deposition
12/30/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Graham depo, calendar
12/31/2020	MA	CC	0.4	\$725.00	\$290.00	Initial review of discovery responses re Hall
12/31/2020	SC	LA	0.9	\$240.00	\$216.00	Save discovery responses re Hall to file, initial document review, index
12/31/2020	MA	CC	0.5	\$725.00	\$362.50	Review additional document production re Zamudio
12/31/2020	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter re scheduling Hall deposition
12/31/2020	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter re scheduling Hall depo, calendar
12/31/2020	MA	CC	1.5	\$725.00	\$1,087.50	Research re appeal in Hakeem
						\$16,401.50

2021 Q1, Q2 Billing Summary \$118,898.50

January 2020	
Timekeeper	Total Amount Billed
David Matthew Haynie (DMH)	\$507.50
Melinda Arbuckle (MA)	\$15,805.00
Mark Lazarz (ML)	\$95.00
Ricardo Prieto (RP)	\$2,610.00
Susan Cavanaugh (SC)	\$1,225.00
Todd Slobin (TS)	\$3,207.50
	\$23,450.00

February 2020	
Timekeeper	Total Amount Billed
Andrea Rios Willingham (ARW)	\$816.00
Danielle Hopkins (DH)	\$24.00
David Matthew Haynie (DMH)	\$72.50
Melinda Arbuckle (MA)	\$20,831.50
Mark Lazarz (ML)	\$855.00
Ricardo Prieto (RP)	\$2,392.50
Susan Cavanaugh (SC)	\$3,216.50
Todd Slobin (TS)	\$3,230.00
	\$31,438.00

March 2020	
Timekeeper	Total Amount Billed
Andrea Rios Willingham (ARW)	\$360.00
Melinda Arbuckle (MA)	\$20,469.00
Ricardo Prieto (RP)	\$290.00
Susan Cavanaugh (SC)	\$504.00
Todd Slobin (TS)	\$285.00
	\$21,908.00

April 2020	
Timekeeper	Total Amount Billed

Danielle Hopkins (DH)	\$96.00
David Matthew Haynie (DMH)	\$145.00
Jesse "Jay" Forester (JF)	\$72.50
Melinda Arbuckle (MA)	\$17,400.00
Ricardo Prieto (RP)	\$10,730.00
Susan Cavanaugh (SC)	\$216.00
Trena Mack (TM)	\$48.00
Todd Slobin (TS)	\$13,395.00
	\$42,102.50

January 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/02/21	MA	CC	0.1	\$725.00	\$72.50	Review read and sign (Capitano), instructions to SC to save
02/02/21	RP	CC	0.1	\$725.00	\$72.50	Review read and sign (Capitano)
02/03/21	SC	LA	0.1	\$240.00	\$24.00	Save read and sign (Capitano)
01/03/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Bak)
01/04/21	MA	CC	2.3	\$725.00	\$1,667.50	Review discovery responses re Pawel Bak
01/04/21	SC	LA	0.5	\$240.00	\$120.00	Save Bak discovery responses, update discovery index
01/04/21	MA	CC	2.5	\$725.00	\$1,812.50	Review discovery responses re Anthony Marquez
01/05/21	MA	CC	0.2	\$725.00	\$145.00	Review and respond to email from OC re depositions
01/05/21	MA	CC	3.4	\$725.00	\$2,465.00	Draft additional discovery requests
01/06/21	MA	CC	0.2	\$725.00	\$145.00	Various emails setting up case strategy conference
01/06/21	RP	CC	0.2	\$725.00	\$145.00	Various emails setting up case strategy conference
01/06/21	TS	SC	0.2	\$950.00	\$190.00	Various emails setting up case strategy conference
01/06/21	DMH	CC	0.2	\$725.00	\$145.00	Various emails setting up case strategy conference
01/06/21	MA	CC	0.4	\$725.00	\$290.00	Case strategy conference
01/06/21	RP	CC	0.4	\$725.00	\$290.00	Case strategy conference
01/06/21	TS	SC	0.4	\$950.00	\$380.00	Case strategy conference
01/06/21	DMH	CC	0.4	\$725.00	\$290.00	Case strategy conference
01/07/21	SC	LA	0.2	\$240.00	\$48.00	Attempt contact Hall
01/07/21	MA	CC	0.2	\$725.00	\$145.00	Review and respond to emails from OC re scheduling depositions
01/07/21	RP	CC	0.2	\$725.00	\$145.00	Review various emails between MA and OC
01/07/21	TS	SC	0.2	\$950.00	\$190.00	Review various emails between MA and OC
01/07/21	SC	LA	0.2	\$240.00	\$48.00	Review various emails between MA and OC
01/07/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Pringle)
01/07/21	MA	CC	2.1	\$725.00	\$1,522.50	Review discovery responses re Sean Pringle, instructions to staff
01/07/21	SC	LA	0.5	\$240.00	\$120.00	Save Pringle discovery responses, update discovery index
01/07/21	SC	LA	0.1	\$240.00	\$24.00	Calendar depositions
01/07/21	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to calendar deposition prep
01/07/21	SC	LA	0.3	\$240.00	\$72.00	Set Bak for depo prep
01/08/21	MA	CC	0.5	\$725.00	\$362.50	Phone call with Anthony Marquez
01/08/21	MA	CC	0.1	\$725.00	\$72.50	Email with SC re Pringle depo
01/08/21	SC	LA	0.2	\$240.00	\$48.00	Email with MA re Pringle depo, client contact
01/08/21	MA	CC	0.1	\$725.00	\$72.50	Attorney WP privileged emails
01/08/21	TS	CC	0.1	\$725.00	\$72.50	Attorney WP privileged emails
01/08/21	MA	CC	0.2	\$725.00	\$145.00	Review and respond to email from OC re depositions
01/08/21	RP	CC	0.1	\$725.00	\$72.50	Review emails between OC and MA
01/08/21	SC	LA	0.1	\$240.00	\$24.00	Review emails between OC and MA

January 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
01/08/21	TS	SC	0.1	\$950.00	\$95.00	Review emails between OC and MA
01/08/21	MA	CC	0.1	\$725.00	\$72.50	Review emails re second amended notice of deposition, Bak, Marquez
01/08/21	SC	LA	0.1	\$240.00	\$24.00	Review emails re second amended notice of deposition, Bak, Marquez, calendar
01/08/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Bak, Marquez)
01/08/21	SC	LA	0.1	\$240.00	\$24.00	Review and calendar email from court reporter (Bak, Marquez)
01/10/21	MA	CC	1	\$725.00	\$725.00	Review documents and prep Bak for deposition
01/11/21	MA	CC	0.2	\$725.00	\$145.00	Draft email to OC
01/11/21	RP	CC	0.1	\$725.00	\$72.50	Review MA email
01/11/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re reschedule Bak deposition
01/11/21	TS	SC	0.1	\$950.00	\$95.00	Review emails between OC and MA
01/11/21	RP	CC	0.1	\$725.00	\$72.50	Review emails between OC and MA
01/11/21	SC	LA	0.1	\$240.00	\$24.00	Review emails between OC and MA
01/11/21	SC	LA	0.2	\$725.00	\$145.00	client contact
01/12/21	TS	SC	0.2	\$950.00	\$190.00	Various emails re mediation, resolution, discussion with mediator
01/12/21	RP	CC	0.2	\$725.00	\$145.00	Various emails re mediation, resolution, discussion with mediator
01/12/21	MA	CC	0.2	\$725.00	\$145.00	Various emails re mediation, resolution, discussion with mediator
01/13/21	SC	LA	0.4	\$240.00	\$96.00	client contact
01/13/21	MA	CC	0.1	\$725.00	\$72.50	Email OC re no deposition for Pringle
01/13/21	SC	LA	0.2	\$240.00	\$48.00	Review client letter, send to MA
01/13/21	MA	CC	0.2	\$725.00	\$145.00	Review and respond to privileged client communication
01/14/21	TS	SC	0.2	\$950.00	\$190.00	Various emails with OC, 408
01/14/21	MA	CC	0.2	\$725.00	\$145.00	Review emails between TS and OC, discuss
01/14/21	RP	CC	0.2	\$725.00	\$145.00	Review emails between TS and OC, discuss
01/15/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Stephens)
01/15/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Stephens)
01/15/21	SC	LA	0.3	\$240.00	\$72.00	client contact
01/15/21	MA	CC	0.9	\$725.00	\$652.50	Review discovery responses re Stephanie Stephens, instructions to staff
01/15/21	SC	LA	0.5	\$240.00	\$120.00	Save Stephens disco, update index
01/15/21	MA	CC	1.2	\$725.00	\$870.00	Analysis re other settlement comparability, send to TS for pitch to OC
01/15/21	RP	CC	0.4	\$725.00	\$290.00	Legal research re claims rates
01/15/21	RP	CC	0.4	\$725.00	\$290.00	Assist with analysis
01/15/21	TS	SC	0.3	\$950.00	\$285.00	Draft email re settlement options to OC
01/15/21	RP	CC	0.1	\$725.00	\$72.50	Review email from OC re barriers to settlement
01/15/21	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re barriers to settlement
01/15/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re barriers to settlement
01/17/21	TS	SC	0.4	\$950.00	\$380.00	Discuss settlement options with OC

EXHIBIT 9

January 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
01/19/21	MA	CC	0.5	\$725.00	\$362.50	Work on second stipulation to extend case deadlines, send to TS
01/19/21	TS	SC	0.2	\$950.00	\$190.00	Review MA draft stip, flip to OC
01/20/21	TS	SC	0.5	\$950.00	\$475.00	Discuss settlement options to pitch to OC
01/20/21	RP	CC	0.5	\$725.00	\$362.50	Discuss settlement options to pitch to OC
01/20/21	MA	CC	0.5	\$725.00	\$362.50	Discuss settlement options to pitch to OC
01/20/21	MA	CC	0.7	\$725.00	\$507.50	Develop settlement pros/cons chart, send to TS
01/20/21	RP	CC	0.2	\$725.00	\$145.00	Review MA chart, feedback
01/21/21	TS	SC	0.1	\$950.00	\$95.00	Request MA rework chart
01/21/21	MA	CC	0.4	\$725.00	\$290.00	Compose email regarding chart
01/21/21	RP	CC	0.1	\$725.00	\$72.50	Review email before sending
01/21/21	TS	SC	0.1	\$950.00	\$95.00	Flip email to OC
01/22/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re counter offer, approve second stipulation for filing
01/22/21	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re counter offer, approve second stipulation for filing
01/22/21	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to file second stipulation for filing
01/22/21	SC	LA	0.2	\$240.00	\$48.00	File second stipulation for filing, submit proposed order, save to file
01/22/21	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 242 (Second Stip to Extend Deadlines)
01/22/21	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 242 (Second Stip to Extend Deadlines)
01/22/21	MA	CC	0.1	\$725.00	\$72.50	Emails re case status
01/22/21	RP	CC	0.1	\$725.00	\$72.50	Emails re case status
01/22/21	DMH	CC	0.1	\$725.00	\$72.50	Emails re case status
01/22/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC re Stephens deposition, respond
01/28/21	TS	SC	0.1	\$950.00	\$95.00	Emails re OC working on numbers, should have counter offer soon, mediator involved
01/28/21	ML	SC	0.1	\$950.00	\$95.00	Emails re OC working on numbers, should have counter offer soon, mediator involved
01/28/21	RP	CC	0.1	\$725.00	\$72.50	Emails re OC working on numbers, should have counter offer soon, mediator involved
01/28/21	MA	CC	0.1	\$725.00	\$72.50	Emails re OC working on numbers, should have counter offer soon, mediator involved
01/29/21	MA	CC	0.7	\$725.00	\$507.50	Notice appeal in Hakeem
01/29/21	SC	LA	0.2	\$240.00	\$48.00	Proof read and file notice of appeal in Hakeem, serve
01/29/21	MA	CC	1.2	\$725.00	\$870.00	Research re procedures for filing notice of appeal, instructions to staff
01/29/21	SC	LA	0.1	\$240.00	\$24.00	Forward file stamped notice of appeal to MA
01/29/21	MA	CC	0.1	\$725.00	\$72.50	Review file stamped notice of appeal, inform RP
						\$23,450.00

February 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/01/21	MA	CC	0.1	\$725.00	\$72.50	Email re status update re 408 email with OC
02/01/21	TS	SC	0.1	\$950.00	\$95.00	Email re status update re 408 email with OC
02/01/21	MA	CC	0.2	\$725.00	\$145.00	Review email setting 16 depositions from 2/22 through 3/13
02/01/21	SC	LA	2.1	\$240.00	\$504.00	Calendar depositions and client contact
02/01/21	TS	SC	0.1	\$950.00	\$95.00	Strategy question to MA
02/01/21	MA	CC	0.1	\$725.00	\$72.50	Respond to TS question
02/01/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC noticing deposition (Breedon)
02/01/21	SC	LA	0.1	\$240.00	\$24.00	Review email from OC noticing deposition (Breedon), calendar
02/01/21	RP	CC	0.1	\$725.00	\$72.50	Ask question re case posture
02/01/21	MA	CC	0.1	\$725.00	\$72.50	Respond question from RP
02/02/21	SC	LA	0.5	\$240.00	\$120.00	Review ECF No. 243 (Order Granting Second Stip), recalendar deadlines
02/02/21	RP	CC	0.1	\$725.00	\$72.50	Review ECF No. 243 (Order Granting Second Stip)
02/02/21	MA	CC	0.1	\$725.00	\$72.50	Review ECF No. 243 (Order Granting Second Stip)
02/02/21	SC	LA	2.1	\$240.00	\$504.00	Additional client contact
02/03/21	MA	CC	0.5	\$725.00	\$362.50	Case discussion
02/03/21	TS	SC	0.6	\$950.00	\$570.00	Case discussion, follow up email to OC
02/04/21	TS	SC	0.3	\$950.00	\$285.00	Return call to OC re counter offer
02/04/21	ARW	LA	0.3	\$240.00	\$72.00	Client contact, calendar Dawood depo prep
02/04/21	ARW	LA	0.3	\$240.00	\$72.00	Client contact, calendar Jaramillo depo prep
02/04/21	MA	CC	0.1	\$725.00	\$72.50	Forward mediation tracker to RP
02/04/21	RP	CC	0.1	\$725.00	\$72.50	Review mediation movement
02/05/21	ARW	LA	0.3	\$240.00	\$72.00	Client contact, calendar Robishaw depo prep
02/05/21	ARW	LA	0.3	\$240.00	\$72.00	Client contact, calendar Winn depo prep
02/05/21	ARW	LA	0.1	\$240.00	\$24.00	Forward client email to MA
02/05/21	MA	CC	0.2	\$725.00	\$145.00	Review and respond to privileged client email
02/05/21	TS	SC	0.3	\$950.00	\$285.00	Various emails with OC
02/05/21	TS	SC	0.3	\$950.00	\$285.00	Discussion re Def's counter offer
02/05/21	ML	SC	0.3	\$950.00	\$285.00	Discussion re Def's counter offer
02/05/21	MA	CC	0.3	\$725.00	\$217.50	Discussion re Def's counter offer
02/05/21	RP	CC	0.3	\$725.00	\$217.50	Discussion re Def's counter offer
02/06/21	TS	SC	0.5	\$950.00	\$475.00	Further discussion re negotiation Def's counter offer
02/06/21	ML	SC	0.5	\$950.00	\$475.00	Further discussion re negotiation Def's counter offer
02/06/21	MA	CC	0.5	\$725.00	\$362.50	Further discussion re negotiation Def's counter offer

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February 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/06/21	RP	CC	0.5	\$725.00	\$362.50	Further discussion re negotiation Def's counter offer
02/08/21	RP	CC	1.1	\$725.00	\$797.50	Legal research re opt in rates, forward to counsel
02/08/21	MA	CC	0.1	\$725.00	\$72.50	Draft email to OC re PAGA component
02/08/21	TS	SC	0.1	\$950.00	\$95.00	Flip email to OC
02/08/21	TS	SC	0.1	\$950.00	\$95.00	Review email from OC re PAGA component
02/08/21	RP	CC	0.1	\$725.00	\$72.50	Discuss email from OC re PAGA component
02/08/21	MA	CC	0.1	\$725.00	\$72.50	Discuss email from OC re PAGA component
02/09/21	ML	SC	0.1	\$950.00	\$95.00	Contribution
02/09/21	MA	CC	2	\$725.00	\$1,450.00	Work on damage models at different opt-in rates
02/09/21	MA	CC	0.3	\$725.00	\$217.50	Discuss damage models
02/09/21	TS	SC	0.3	\$950.00	\$285.00	Discuss damage models
02/09/21	MA	CC	0.1	\$725.00	\$72.50	Review notice from Appellate Court in Hakeem re Civil Case Info Statement due
02/09/21	SC	LA	0.1	\$240.00	\$24.00	Calendar deadline
02/09/21	RP	CC	0.3	\$725.00	\$217.50	Negotiation strategy discussion
02/09/21	MA	CC	0.3	\$725.00	\$217.50	Negotiation strategy discussion
02/09/21	SC	LA	0.1	\$240.00	\$24.00	Forward client email to MA
02/09/21	MA	CC	0.3	\$725.00	\$217.50	Review and respond to privileged client email
02/10/21	MA	CC	8.1	\$725.00	\$5,872.50	Document review re dozens of clients
02/10/21	SC	LA	4	\$240.00	\$960.00	Assist MA with document review, save documents
02/10/21	MA	CC	0.2	\$725.00	\$145.00	Work on damage models for TS
02/10/21	TS	SC	0.2	\$950.00	\$190.00	Draft email to mediator
02/10/21	ARW	LA	1.1	\$240.00	\$264.00	Client contact, schedule deposition prep (Jones)
02/11/21	TS	SC	0.3	\$950.00	\$285.00	Discussion with mediator, draft email to OC
02/11/21	MA	CC	0.2	\$725.00	\$145.00	Proof TS email
02/12/21	MA	CC	0.2	\$725.00	\$145.00	Review and respond to privileged client email
02/12/21	RP	CC	0.1	\$725.00	\$72.50	Review email to mediator, feedback
02/13/21	MA	CC	0.1	\$725.00	\$72.50	Review and respond to privileged client email
02/15/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Ramsey)
02/15/21	SC	LA	0.1	\$240.00	\$24.00	Calendar Ramsey depo
02/17/21	MA	CC	0.8	\$725.00	\$580.00	Review discovery responses re Robishaw
02/17/21	SC	LA	0.4	\$240.00	\$96.00	Save discovery responses re Robishaw, update index
02/17/21	MA	CC	0.1	\$725.00	\$72.50	Review email withdrawing depo notices, respond
02/19/21	ARW	LA	0.5	\$240.00	\$120.00	Client contact

EXHIBIT 9

February 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/19/21	MA	CC	1.5	\$725.00	\$1,087.50	Document review Davis discovery responses
02/19/21	SC	LA	0.2	\$240.00	\$48.00	Save Davis discovery responses to file
02/20/21	MA	CC	0.1	\$725.00	\$72.50	Privileged client emails
02/21/21	ARW	LA	0.1	\$240.00	\$24.00	Email reminder to MA re depo prep
02/21/21	MA	CC	1	\$725.00	\$725.00	Depo prep Nihjuel Z Jones
02/22/21	MA	CC	0.4	\$725.00	\$290.00	Review documents re Gelberg
02/22/21	SC	LA	0.1	\$240.00	\$24.00	Save Gelberg disco responses to file
02/22/21	DH	LA	0.1	\$240.00	\$24.00	Email re status re payment of costs to Phoenix
02/22/21	MA	CC	0.1	\$725.00	\$72.50	Respond to DH
02/22/21	RP	CC	0.1	\$725.00	\$72.50	Respond to DH
02/22/21	MA	CC	0.1	\$725.00	\$72.50	Question about deposition Ramsey
02/22/21	ARW	LA	0.1	\$240.00	\$24.00	Answer MA question
02/22/21	MA	CC	0.1	\$725.00	\$72.50	Ask Susan to communicate with client re privileged communication
02/22/21	SC	LA	0.2	\$240.00	\$48.00	client contact
02/22/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Robishaw)
02/22/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Robishaw), calendar
02/22/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Davis)
02/22/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Davis), calendar
02/22/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Gelberg)
02/22/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Gelberg), calendar
02/23/21	MA	CC	1	\$725.00	\$725.00	Depo prep Robishaw
02/23/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Hill)
02/23/21	ARW	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Hill), calendar
02/23/21	MA	CC	0.3	\$725.00	\$217.50	Review email from OC re Union Employees
02/23/21	SC	LA	0.1	\$240.00	\$24.00	Save spreadsheet re Union Employees to file
02/23/21	MA	CC	0.3	\$725.00	\$217.50	Review document production re Hill
02/23/21	SC	LA	0.1	\$240.00	\$24.00	Save discovery responses re Hill, update index
02/23/21	SC	LA	0.5	\$240.00	\$120.00	Work on discovery responses re Robishaw
02/24/21	MA	CC	0.4	\$725.00	\$290.00	Try to work with Robishaw re technology for depo, email OC need to reschedule
02/24/21	MA	CC	1.1	\$725.00	\$797.50	Work on appellate filings
02/24/21	SC	LA	0.3	\$240.00	\$72.00	Work on filing appellate docs, serve
02/24/21	RP	CC	0.1	\$725.00	\$72.50	Request confirmation documents filed
02/24/21	SC	LA	0.1	\$240.00	\$24.00	Confirm documents filed

EXHIBIT 9

February 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
02/24/21	RP	CC	0.1	\$725.00	\$72.50	Discussion re pushing back depositions before second mediation
02/24/21	TS	SC	0.1	\$950.00	\$95.00	Discussion re pushing back depositions before second mediation
02/24/21	MA	CC	0.1	\$725.00	\$72.50	Discussion re pushing back depositions before second mediation
02/25/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Jones)
02/25/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Jones), calendar
02/25/21	MA	CC	0.2	\$725.00	\$145.00	Review Toure designation of record on appeal (Hakeem)
02/25/21	RP	CC	0.2	\$725.00	\$145.00	Review Toure designation of record on appeal (Hakeem)
02/25/21	MA	CC	0.1	\$725.00	\$72.50	Review Hakeem mediation statement
02/25/21	MA	CC	0.1	\$725.00	\$72.50	Review amended notice of deposition (Jones)
02/25/21	SC	LA	0.1	\$240.00	\$24.00	Review amended notice of deposition (Jones), calendar
02/25/21	MA	CC	1	\$725.00	\$725.00	Work on designation of record on appeal (Hakeem)
02/25/21	MA	CC	0.5	\$725.00	\$362.50	Review document production re Jones
02/25/21	SC	LA	0.2	\$240.00	\$48.00	Review discovery responses re Jones, save to file, update index
02/25/21	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to alter calendar entry re Jones depo
02/25/21	MA	CC	1	\$725.00	\$725.00	Depo prep Davis
02/25/21	TS	SC	0.1	\$950.00	\$95.00	Emails re pushing out case deadlines and depositions, no response from OC
02/25/21	RP	CC	0.1	\$725.00	\$72.50	Emails re pushing out case deadlines and depositions, no response from OC
02/25/21	MA	CC	0.1	\$725.00	\$72.50	Emails re pushing out case deadlines and depositions, no response from OC
02/26/21	ARW	LA	0.1	\$240.00	\$24.00	Recalendar Jones depo
02/26/21	SC	LA	0.3	\$240.00	\$72.00	Work on filing, serving designation of record on appeal (Hakeem)
02/26/21	MA	CC	0.5	\$725.00	\$362.50	Work on discovery responses re Davis
02/26/21	SC	LA	0.5	\$240.00	\$120.00	Update Davis discovery index
02/26/21	MA	CC	2	\$725.00	\$1,450.00	Deposition of Alyssa Davis
02/26/21	ARW	LA	0.1	\$240.00	\$24.00	Email re upcoming depositions, lack of confirmation Gelberg
02/26/21	MA	CC	0.1	\$725.00	\$72.50	Review ARW email
02/26/21	MA	CC	0.5	\$725.00	\$362.50	Work together on transcript request in Hakeem
02/26/21	SC	LA	0.5	\$240.00	\$120.00	Work together on transcript request in Hakeem
02/26/21	MA	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Winn)
02/26/21	SC	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Winn), calendar
02/26/21	MA	CC	0.1	\$725.00	\$72.50	Email OC - cannot confirm Gelberg depo
02/27/21	MA	CC	0.1	\$725.00	\$72.50	Brief case status emails
02/27/21	DMH	CC	0.1	\$725.00	\$72.50	Brief case status emails
\$31,438.00						

EXHIBIT 9

March 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
03/01/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Lopez)
03/01/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Lopez), calendar
03/01/21	ARW	LA	0.3	\$240.00	\$72.00	Client contact
03/01/21	MA	CC	0.1	\$725.00	\$72.50	email to ARW re client no showed for prep
03/01/21	ARW	LA	0.1	\$240.00	\$24.00	Forward privileged client communication to MA
03/01/21	SC	LA	0.1	\$240.00	\$24.00	Brief discussion re issues getting transcripts in Hakeem
03/01/21	MA	CC	0.1	\$725.00	\$72.50	Brief discussion re issues getting transcripts in Hakeem
03/01/21	MA	CC	0.1	\$725.00	\$72.50	Review Order filed in Hakeem
03/01/21	SC	LA	0.1	\$240.00	\$24.00	Review Order filed in Hakeem
03/02/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC cancelling Lopez depo, arb agreement
03/02/21	ARW	LA	0.1	\$240.00	\$24.00	Cancel deposition
03/02/21	MA	CC	0.1	\$725.00	\$72.50	Email OC re Hill no show prep - reschedule depo
03/02/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Hanks)
03/02/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Hanks), calendar
03/02/21	ARW	LA	0.2	\$240.00	\$48.00	Client contact
03/02/21	MA	CC	0.9	\$725.00	\$652.50	Review client documents (Hill)
03/02/21	SC	LA	0.3	\$240.00	\$72.00	Save client documents, discovery, update index
03/03/21	MA	CC	0.5	\$725.00	\$362.50	Review and respond to privileged client concerns
03/03/21	MA	CC	0.2	\$725.00	\$145.00	Review email from OC re issues with client list
03/03/21	MA	CC	0.1	\$725.00	\$72.50	Review Hakeem Am Mediation Statement
03/03/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Gilbert)
03/03/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Gilbert), calendar
3/4/2021	MA	CC	5.1	\$725.00	\$3,697.50	Work on fixing client mismatch spreadsheet issue.
3/4/2021	MA	CC	0.1	\$725.00	\$72.50	Email re Jones missed deposition
03/04/21	MA	CC	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Winslow)
03/04/21	SC	LA	0.1	\$240.00	\$24.00	Review email from court reporter setting deposition (Winslow), calendar
03/04/21	ARW	LA	0.2	\$240.00	\$48.00	Client contact
03/04/21	MA	CC	1	\$725.00	\$725.00	Review client documents (Winslow)
03/04/21	SC	LA	0.2	\$240.00	\$48.00	Save client documents, discovery, update index
03/04/21	ARW	LA	0.2	\$240.00	\$48.00	Discussion re Nihjuel Jones, reschedule
03/04/21	MA	CC	0.2	\$725.00	\$145.00	Discussion re Nihjuel Jones, reschedule
3/5/2021	SC	LA	0.1	\$240.00	\$24.00	Question re filing rejection in Hakeem
3/5/2021	MA	CC	0.5	\$725.00	\$362.50	Research and respond to SC question re filing rejection in Hakeem

EXHIBIT 9

March 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
3/5/2021	MA	CC	0.2	\$725.00	\$145.00	Gather Chuck Stohler availability
3/5/2021	MA	CC	4.5	\$725.00	\$3,262.50	More work on fixing client mismatch spreadsheet issue.
03/08/21	MA	CC	0.1	\$725.00	\$72.50	Review email from court reporter setting deposition (Breedon)
03/08/21	ARW	LA	0.2	\$240.00	\$48.00	Client contact
03/08/21	MA	CC	0.1	\$725.00	\$72.50	Answer ARW questions for client contact project
03/08/21	MA	CC	0.2	\$725.00	\$145.00	Review documents (Breedon)
03/08/21	SC	LA	0.1	\$240.00	\$24.00	Save client documents, discovery, update index
3/9/2021	ARW	LA	0.2	\$240.00	\$48.00	Discuss client contact process
3/9/2021	MA	CC	0.1	\$725.00	\$72.50	Discuss client contact process
3/9/2021	TS	SC	0.1	\$950.00	\$95.00	Emails with opposing counsel re mediator
3/9/2021	MA	CC	0.1	\$725.00	\$72.50	Review TS emails with OC
3/9/2021	RP	CC	0.1	\$725.00	\$72.50	Review TS emails with OC
3/12/2021	MA	CC	0.3	\$725.00	\$217.50	Work on gathering mediation availability from Anne Marie Estevez
3/15/2021	MA	CC	5.6	\$725.00	\$4,060.00	Work on fixing client mismatch spreadsheet issue in advance of mediation
3/15/2021	MA	CC	0.8	\$725.00	\$580.00	Depo Summary (Davis)
3/15/2021	MA	CC	0.1	\$725.00	\$72.50	Privileged client communication
3/16/2021	RP	CC	0.1	\$725.00	\$72.50	Review email from mediator confirming mediation date
3/16/2021	MA	CC	0.1	\$725.00	\$72.50	Review email from mediator confirming mediation date
3/16/2021	TS	SC	0.1	\$950.00	\$95.00	Review email from mediator confirming mediation date
3/16/2021	MA	SC	0.1	\$725.00	\$72.50	Review order waiving filing fee in Hakeem appeal
3/16/2021	RP	CC	0.1	\$725.00	\$72.50	Various emails with opposing counsel setting timing of mediation
3/16/2021	MA	CC	0.1	\$725.00	\$72.50	Various emails with opposing counsel setting timing of mediation
3/16/2021	TS	SC	0.1	\$950.00	\$95.00	Various emails with opposing counsel setting timing of mediation
3/16/2021	MA	CC	0.1	\$725.00	\$72.50	Review corr from mediator, instructions to staff
3/16/2021	SC	LA	0.3	\$240.00	\$72.00	Work on arranging fee for mediator
3/19/2021	SC	LA	0.3	\$240.00	\$72.00	Issue in Hakeem appeal - default
3/19/2021	RP	CC	0.1	\$725.00	\$72.50	review emails between MA and SC
3/19/2021	MA	CC	0.7	\$725.00	\$507.50	Research issue and respond to SC re default in Hakeem appeal
3/19/2021	MA	CC	0.1	\$725.00	\$72.50	Review email from Murray re default in Hakeem appeal
3/23/2021	MA	CC	5	\$725.00	\$3,625.00	mediation prep, revise mediation brief, add additional detail from discovery
3/23/2021	SC	LA	0.2	\$240.00	\$48.00	Deal with invoice re Davis depo
3/23/2021	MA	CC	0.1	\$725.00	\$72.50	Review email from Cole designating ROA in Hakeem
3/26/2021	MA	CC	0.2	\$725.00	\$145.00	Communication with Anne Marie Estevez re went in a different direction

EXHIBIT 9

March 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
3/26/2021	MA	CC	0.1	\$725.00	\$72.50	Privileged client communication
3/26/2021	MA	CC	0.1	\$725.00	\$72.50	Privileged client communication
\$21,908.00						

April 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/02/21	MA	CC	0.1	\$725.00	\$72.50	Ask TS if he confirmed stay with OC
04/02/21	TS	SC	0.1	\$950.00	\$95.00	Request MA write email for me
04/02/21	MA	CC	0.1	\$725.00	\$72.50	Write email for Todd
04/02/21	TS	SC	0.1	\$950.00	\$95.00	Flip email to OC
04/05/21	MA	CC	0.1	\$725.00	\$72.50	Review documents filed in Hakeem served
04/05/21	MA	CC	0.2	\$725.00	\$145.00	Privileged client communication
04/06/21	MA	CC	0.1	\$725.00	\$72.50	Follow up status of stay
04/06/21	TS	SC	0.1	\$950.00	\$95.00	Follow up with OC re status of stay
04/06/21	MA	CC	0.1	\$725.00	\$72.50	Instructions to staff to call client
04/06/21	RP	CC	0.1	\$725.00	\$72.50	Coordinate with Charles Stohler re pre mediation call
04/06/21	MA	CC	0.1	\$725.00	\$72.50	Coordinate with Charles Stohler re pre mediation call
04/07/21	MA	CC	0.1	\$725.00	\$72.50	Privileged client communication
04/08/21	MA	CC	4.4	\$725.00	\$3,190.00	Finish editing mediation statement
04/08/21	MA	CC	0.1	\$725.00	\$72.50	Send mediation statement
04/09/21	MA	CC	0.4	\$725.00	\$290.00	Call re amending filings in Hakeem appeal
04/09/21	SC	LA	0.4	\$240.00	\$96.00	Call re amending filings in Hakeem appeal
04/09/21	RP	CC	1	\$725.00	\$725.00	Pre mediation call with Charles Stohler
04/09/21	MA	CC	1	\$725.00	\$725.00	Pre mediation call with Charles Stohler
04/09/21	MA	CC	0.3	\$725.00	\$217.50	Gather and send documents to Charles Stohler
04/09/21	MA	CC	0.1	\$725.00	\$72.50	Review response email from Charles Stohler
04/12/21	MA	CC	0.5	\$725.00	\$362.50	Privileged client communication
04/12/21	TS	SC	0.1	\$950.00	\$95.00	Review email from Charles Stohler
04/12/21	RP	CC	0.1	\$725.00	\$72.50	Review email from Charles Stohler
04/12/21	MA	CC	0.1	\$725.00	\$72.50	Review email from Charles Stohler
04/13/21	MA	CC	0.7	\$725.00	\$507.50	Review Def draft MOU
04/14/21	TS	SC	0.5	\$950.00	\$475.00	Pre mediation meeting
04/14/21	RP	CC	0.5	\$725.00	\$362.50	Pre mediation meeting
04/14/21	MA	CC	0.5	\$725.00	\$362.50	Pre mediation meeting
04/14/21	TS	SC	1.2	\$950.00	\$1,140.00	Prep and attend additional pre mediation conference with Charles Stohler
04/14/21	RP	CC	1.1	\$725.00	\$797.50	Prep and attend additional pre mediation conference with Charles Stohler
04/14/21	MA	CC	2.1	\$725.00	\$1,522.50	Prep and attend additional pre mediation conference with Charles Stohler
04/14/21	DH	LA	0.4	\$240.00	\$96.00	Update case expenses
04/15/21	TS	SC	12	\$950.00	\$11,400.00	Prep and attend full day mediation with Charles Stohler
04/15/21	RP	CC	12	\$725.00	\$8,700.00	Prep and attend full day mediation with Charles Stohler

EXHIBIT 9

April 2021

Date	Timekeeper	Role	Hours	Rate	Fee	Description
04/15/21	MA	CC	12	\$725.00	\$8,700.00	Prep and attend full day mediation with Charles Stohler
04/16/21	DMH	CC	0.2	\$725.00	\$145.00	Case status meeting, assign TM to contact Alisa Jones for signature
04/16/21	MA	CC	0.2	\$725.00	\$145.00	Case status meeting, assign TM to contact Alisa Jones for signature
04/16/21	TM	LA	0.2	\$240.00	\$48.00	Contact Alisa Jones for signature
04/16/21	SC	LA	0.3	\$240.00	\$72.00	Client contact re Moore, Guerra signature
04/16/21	MA	CC	0.1	\$725.00	\$72.50	Email OC with partially executed MOU
04/16/21	JF	CC	0.1	\$725.00	\$72.50	Email MA re case status
04/16/21	MA	CC	0.1	\$725.00	\$72.50	Respond to JF email
04/16/21	MA	CC	0.1	\$725.00	\$72.50	Review and respond to OC email re gathering signatures
04/16/21	MA	CC	0.1	\$725.00	\$72.50	Contact Moore re settlement
04/16/21	MA	CC	0.1	\$725.00	\$72.50	Privileged client communication
04/19/21	SC	LA	0.2	\$240.00	\$48.00	Client contact re Guerra signature
04/19/21	MA	CC	0.1	\$725.00	\$72.50	email plaintiff executed MOU to OC
04/01/21	MA	CC	0.1	\$725.00	\$72.50	Review email from OC attaching fully executed MOU
\$42,102.50						

EXHIBIT B

Todd Slobin

Founding Partner

"In the middle of chaos lies opportunity." Bruce Lee



EMAIL TODD SLOBIN

I am Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization. Since 1998, I have exclusively handled employment law cases. I specialize in representing executive-level employees in negotiating Executive Agreements, Severance Agreements, and Employment Contracts. The business day ranges from advising clients through challenging circumstances to advocating for clients in federal or state court or in arbitration. As a counselor and attorney, I enjoy developing strong relationships with my clients. Each engagement is a partnership, and I represent each client diligently and earnestly with the utmost integrity. My goal in each case is to work with my clients to get the very best result for them, whatever that may be. If a matter cannot be resolved through negotiations, I also enjoy the challenge of litigation and trial. I also enjoy taking on large corporations and handling cases against the top defense firms in the country.

In recent years, I have resolved many cases for executives where the net recovery to the clients was in excess of one million dollars. For example, \$1,139,956.00; \$1,148,500.00; \$1,299,320.00; and \$1,867,500.00. In 2011, I had the top verdict in Texas in employment law with a \$3,200,000 verdict shared by three clients. In addition to executive cases, I have been lead-counsel in several national collective action cases under the Fair Labor Standards Act ("FLSA") and have secured several multi-million dollar nationwide wage and hour class-action settlements. I also manage cases under various state and federal laws, including Title VII and Title IX cases, the Americans with Disabilities Act ("ADA"), the Age Discrimination in Employment Act ("ADEA"), the Family and Medical Leave Act ("FMLA"), the Texas Commission on Human Rights Act, the Uniformed Services Employment and Reemployment Rights Act ("USERRA"), and other employment statutes.

I am a former Chairman of the Labor and Employment Law Section of the Houston Bar Association (2007-2008). I am a member of the Labor and Employment Law Section of the State Bar of Texas and the Labor and Employment Law Section of the Houston Bar Association. I am also a former Labor & Employment Law Exam Commission Member of the Texas Board of Legal Specialization; the Commission designs and grades the Labor & Employment Law Board Certification exam.

I am admitted to practice law in the Supreme Court of the United States of America, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the Eastern District of Texas, the Northern District of Texas, the Southern District of Texas, the Western District of Texas, and all Texas state courts.

Since 2005, I have continually received the honor of being named a Super Lawyer® (a Thomson Reuters service), and I received the honor of Top Lawyer from H Texas magazine in 2013. In 2013, 2014, and 2015, I also received the Top Lawyers honor in the "Best of Houstonia" issues of Houstonia Magazine, sponsored by Green Bank, and I was a Texas Bar Foundation Fellow in 2015-2016.

I have spoken on many employment law subjects over the years including, Trying an Employment Law case, Jury Bias in the Trump Era, The First 30 Days of the Case, Professional Courtesy and Ethics: How You Should Treat Opposing Counsel, Privacy and Tort Law in the Workplace, The FMLA from Both Sides of the Docket, and Employment Cases in Federal Court, to name a few.

I have also been regularly interviewed on KPRCChannel 2 in Houston on a variety of employment law topics. Over the years, I have been interviewed by the Houston Chronicle on several of the cases that I have handled. I also appeared on the *Dianne Andrews Show*, a popular Louisiana-based talk show, to discuss the #MeToo movement.

My firm and its reputation are important to me. If you are considering retaining my firm, please contact attorneys at any of the large Houston legal defense firms to confirm my qualifications. If you have questions or need legal advice, please call or email me so we can explore whether Shellist Lazarz Slobin can assist you.



713-352-3433

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EXHIBIT C

RICARDO J. PRIETO

RESUME

PROFESSIONAL EXPERIENCE

Shellist Lazarz Slobin, LLP
Partner; July 2012 – Present

Houston, TX

- Generates and manages litigation case docket exclusively related to employment issues, with primary focus on FLSA Wage and Hour collective and class action cases and state law counterparts across the United States.
- First chair litigation and trial experience in federal and state employment cases, from initial case screening through trial.
- Experience representing employees before federal and state administrative agencies, including the Equal Employment Opportunity Commission, the Texas Workforce Commission, and the Department of Labor.
- Federal law practice focuses primarily on FLSA Wage and Hour cases. Experience in all aspects of FLSA litigation, including nationwide class and collective actions. Lead attorney in most cases.

Kennedy Hodges, LLP
Associate, June 2009 – July 2012

Houston, TX

- Managed litigation case docket: 75% FLSA / 25% Personal Injury.
- Litigation experience in federal and state cases, from initial case screening through trial.
- Federal law practice focused primarily on FLSA Wage and Hour cases.
- State law practice focused primarily on personal injury cases: auto accident, non-subscriber workplace job injury, premises liability, pharmaceutical errors, wrongful death, and breach of contract cases.

The Law Offices of Wayne T. Rife, PC
Associate, September 2008 – June 2009

College Station, TX

- Provided litigation support as associate attorney for solo attorney with a general civil litigation docket.
- Experience in probate, construction and property law.
- Texas Certified Attorney Ad Litem.

BAR/COURT ADMISSIONS

- Texas State Bar, May 2008
- United States Court of Appeals for the Fifth Circuit
- United States Court of Appeals for the Ninth Circuit
- United States Colorado District Court
- United States New Mexico District Court
- United States North Dakota District Court
- United States District Court for the Northern, Southern, Western and Eastern Districts of Texas
- United States District Court for the Western District of Arkansas
- United States District Court for the Western District of Oklahoma
- United States District Court for the Northern District of Ohio

EDUCATION

Oklahoma City University School of Law
J.D., December 2007
Honors

Oklahoma City, OK

- Dean's List Spring 2005, Fall 2005, Spring 2006, Spring 2007
- Phi Delta Phi (honor law fraternity for students in top 25% of Class)
- CALI Award for highest grade in antitrust law

Texas A & M University
B.A., Political Science, December 2002
Minor in Spanish/Hispanic Studies

College Station, TX

CERTIFIED LEGAL SPECIALTIES

- Board Certified, Labor and Employment Law, Texas Board of Legal Specialization

HONORS AND AWARDS

- Texas Super Lawyers' "Rising Star" by Texas Monthly, 2014 – 2018
- Texas "Super Lawyer" by Texas Monthly, 2021 – 2022
- Named "Litigator of the Week" by Texas Lawyer – 2015 (FLSA Jury Trial Victory)
- Trial verdict selected for inclusion in "Top Texas Verdicts & Settlements of 2014," as reported by Verdict Search
- Member of The College of the State Bar of Texas, an organization recognizing commitment to continuing legal education

PUBLICATIONS

- Contributing author to the American Bar Association's FLSA Midwinter Report, 2016, 2018 – 2022

PROFESSIONAL AFFILIATIONS

- National Employment Lawyers Association (NELA) – former Treasurer, former Secretary
- Member of the Labor and Employment Law Section of the State Bar of Texas
- Member of the Labor and Employment Law Section of the Houston Bar Association
- Member of the Texas Employment Lawyers Association (TELA)
- Houston Bar Association – Labor & Employment Section – Council Member 2021-2024

LANGUAGES

- Fluent in Spanish

EXHIBIT D

Jay Forester



wage@foresterhaynie.com
[214-210-2100](tel:214-210-2100)
[Contact Us Today](#)

Admissions:

- Supreme Court of the United States
- Supreme Court of Texas
- District of Columbia Court of Appeals
- Fourth Circuit Court of Appeals
- Fifth Circuit Court of Appeals
- Sixth Circuit Court of Appeals
- Tenth Circuit Court of Appeals
- District of Colorado
- Northern District of Indiana
- Eastern District of Michigan
- Western Michigan
- Eastern District of Missouri
- District of New Mexico

EXHIBIT 9

- Western District of New York
- Northern District of New York
- Western District of Tennessee
- Eastern District of Tennessee
- Middle District of Tennessee
- Eastern District of Texas
- Southern District of Texas
- Northern District of Texas
- Western District of Texas
- Eastern District of Wisconsin
- Western District of Wisconsin

Collective & Class Actions

Attorney

From the playground of Lipscomb Elementary in Dallas, TX to federal courtrooms throughout the United States, Jay has never been afraid to take on the biggest bullies. A natural advocate and former policy debate champion, Jay now leads Forester Haynie along with Matthew Haynie.

A fourth generation SMU Mustang (J.D.), Jay also holds a B.A. from the University of Michigan where he also completed a term of service with AmeriCorps in Dearborn and spent several semesters tutoring high school students in downtown Detroit. Prior to law school, he also received an M.A. from the George Washington University and worked for several years as a high school Spanish teacher in Metro DC. Since graduating from law school, he helped launch a website designed to assist lawyers learn Spanish.

Beyond his daily efforts to serve his clients and FH teammates, Jay also serves his community as an Advisory Board member of Mosaic Family Services, a Dallas-based non-profit where he was previously also a member of the Executive Committee, its inaugural legal extern, and an intern. Jay is a fellow of numerous bar foundations, has served as the Chair of committees for both the State Bar of Texas and American Bar Association (ABA), and has also been elected to serve the North Texas legal community as its representative to both the [Texas Young Lawyers Association](#) and the [ABA's Young Lawyers Division](#). Jay is a proud husband, member at Munger Place Church in East Dallas, and a founder of Forester Haynie's [#WorkShouldntSuck](#) movement.

Jay Forester



Matthew Haynie



matthew@foresterhaynie.com

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- Eastern District of Arkansas
- Western District of Arkansas
- District of Colombia
- Northern District of Indiana
- Southern District of Indiana
- Eastern District of Missouri
- Western District of Oklahoma
- Texas
- Eastern District of Texas
- Southern District of Texas
- Northern District of Texas
- Western District of Texas
- Eastern District of Wisconsin
- Western District of Wisconsin

- 5th Circuit Court of Appeals
- 6th Circuit Court of Appeals
- Supreme Court of the United States

A. Pharmaceutical & Medical Device Litigation

Attorney

Matthew Haynie, a founding partner at **Forester Haynie**, has dedicated his career to fighting large companies and entities that have put profits before people's lives. Matthew manages the firm's personal injury and [pharmaceutical/medical device litigation](#) teams where he enjoys partnering with clients and their families and helping them navigate the legal process during what is often the most difficult time of their lives. Matthew is honored to have the trust of so many clients and their families as they deal with often life-threatening injuries and the most traumatic events imaginable. Since starting his career, Matthew has worked on thousands of cases from start to finish. Through his many years of practice, Matthew has developed an in-depth understanding of the legal system and how to best navigate that system on behalf of his clients. In fact, Matthew has helped clients recover tens of millions of dollars in settlements. Though Matthew's career has focused on representing plaintiffs in personal injury litigation, he knew early in life that he wanted to dedicate his career to helping others.

As an undergraduate student, Matthew interned for Andrew Laming, a Queensland House Representative in the Parliament of Australia who was instrumental in gaining access to healthcare for indigenous Australians. Matthew also worked on an award-winning documentary about exiled Tibetans living in refugee camps and monasteries across India. Both of these encounters opened his eyes to the atrocities human beings experience and strengthened his resolve to pursue a career in law that would allow him to seek justice for those who are injured by the wrongful acts of others.

Matthew graduated with his Juris Doctor from Southern Methodist University's Dedman School of Law in Dallas, Texas. He also holds a Bachelor of Arts degree in Political Science and Journalism from the University of Arkansas, where he graduated *magna cum laude*. He was a recipient of the Senior Honor Citation, an award given to the top graduating male and female student in each class. Matthew has been named to the National Trial Lawyers Top 40 Under 40 Civil Plaintiff Trial Lawyers, American Academy of Attorneys Top 40 Under 40, a Rising Star by Super Lawyers, and one of the Top 40 under 40 by D Magazine.



Texas Bar College
Professionalism Through Education



EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

GEORGE BREWSTER and RUSSEL
WILSON JR., individually and behalf of
all others similarly situated,

Plaintiffs,

vs.

ALL AMERICAN OILFIELD, LLC,

Defendant.

Case No. 3:21-cv-00007-JMK

**ORDER GRANTING JOINT
MOTION FOR SETTLEMENT
APPROVAL**

Before the Court is the Parties' Joint Motion for Settlement Approval (the "Motion").¹ On February 24, 2022, this Court ordered supplemental briefing on the Motion,² which the parties jointly filed on April 13, 2022.³ A revised Settlement Agreement ("the Revised Agreement") has been filed under seal,⁴ along with other supporting documents.⁵ The Court approves the Revised Agreement, and the Motion is GRANTED.

¹ [Docket 36](#).

² [Docket 45](#).

³ [Docket 52](#) (sealed).

⁴ [Docket 52-1](#) (sealed); [Docket 53](#) (amendment) (sealed).

⁵ *See generally* [Docket 52](#) (sealed).

I. OVERVIEW OF THE PROPOSED SETTLEMENT

Plaintiffs' Second Amended Complaint alleges that Defendant All American Oilfield, LLC ("Oilfield") violated the Fair Labor Standards Act ("FLSA") by requiring Plaintiffs and other similarly situated employees to work more than forty hours per workweek, paid on a day rate basis, without being compensated for overtime.⁶ Defendant filed two Motions to Dismiss before the parties entered into settlement negotiations.⁷ The parties filed a Notice of Settlement on August 6, 2021,⁸ and the parties filed the present Motion on January 13, 2022.⁹

The Revised Agreement establishes a maximum gross settlement amount of \$375,000,¹⁰ including:

1. \$209,008 in individual settlement awards, paid to Participating Settlement Class Members based on each member's estimated overtime;¹¹
2. \$10,000 in service award payments, specifically, \$5,000 to each named Plaintiff;¹²
3. \$150,992 in attorneys' fees and litigation costs to Class Counsel;¹³ and

⁶ See generally [Docket 40](#).

⁷ [Docket 14](#); [Docket 17](#). The Court denied the Motions to Dismiss as moot after Plaintiffs filed a First and Second Amended Complaint. [Docket 44](#).

⁸ [Docket 21](#).

⁹ [Docket 36](#).

¹⁰ [Docket 52-1 at ¶ 9\(i\)](#) (sealed).

¹¹ [Docket 52-1 at ¶ 9\(k\)](#) (sealed); see also *id.* at 23 (Exhibit B to Revised Agreement).

¹² [Docket 52-1 at ¶ 15\(a\)](#) (sealed).

¹³ [Docket 52-1 at ¶ 15\(b\)](#) (sealed).

4. \$5,000 in settlement administration costs, including payment of the Settlement Administrator.¹⁴

In consideration for these awards, Participating Settlement Class Members release any wage-related claims against Defendant for work performed during the Class Period.¹⁵ Named Plaintiffs George Brewster and Russel Wilson are subject to a more general release from any and all claims against Defendant based on conduct up to and including the date of this Order.¹⁶ Defendant, in turn, releases Plaintiff George Brewster from any and all claims, including those brought against him in *All American Oilfield, LLC v. George Brewster*, Case No. 3AN-21-08351CI, in the District Court for the State of Alaska Third Judicial District at Anchorage (“the Brewster Litigation”).¹⁷

The Revised Agreement provides that Plaintiffs’ counsel will send the Notice of Settlement to all Settlement Class Members within fourteen days of the Court’s approval of the Revised Agreement.¹⁸ To opt into the settlement, Class Members must return executed settlement papers to Plaintiffs’ counsel within sixty days.¹⁹

The Revised Agreement stipulates that, solely for settlement purposes, the requisites for establishing collective action certification under the FLSA pursuant to 29 U.S.C. § 216(b) are met.²⁰ It further provides that Plaintiffs shall file a Motion for Approval of Settlement Agreement, requesting that the Court approve the settlement,

¹⁴ Docket 52-1 at ¶ 15(c) (sealed).

¹⁵ See *id.* at ¶ 10(b) (sealed); Docket 53 (amendment) (sealed).

¹⁶ Docket 52-1 at ¶ 10(a) (sealed).

¹⁷ *Id.* (sealed)

¹⁸ *Id.* at ¶ 11(d) (sealed).

¹⁹ *Id.* at ¶ 19 (sealed).

²⁰ *Id.* at ¶ 7 (sealed).

certify the Settlement Class pursuant to 29 U.S.C. § 216(b) for settlement purposes only, and approve the Notice form.²¹ Plaintiffs' initial Motion does not address certification of the collective action or approval of the Notice form;²² however, the parties' supplemental briefing includes those requests.²³

II. LEGAL STANDARD

The provisions of the FLSA are not subject to waiver by employees.²⁴ As such, wage claims arising under the FLSA may be settled only with approval from a district court or the Secretary of Labor.²⁵ To approve settlement of FLSA claims, the Court must determine whether the settlement agreement represents a "fair and reasonable resolution of a bona fide dispute."²⁶

First, the court decides if a bona fide dispute exists. "A bona fide dispute exists when there are legitimate questions about 'the existence and extend of Defendant's FLSA liability.' . . . If there is no question that the FLSA entitles plaintiffs to the compensation they seek, then a court will not approve a settlement because to do so would allow the employer to avoid the full cost of complying with the statute."²⁷

²¹ *Id.* at ¶ 11(a) (sealed).

²² *See* Docket 36.

²³ Docket 52 at 2–3 (sealed).

²⁴ *Lynn's Food Stores, Inc. v. United States By & Through U.S. Dep't of Lab., Emp. Standards Admin., Wage & Hour Div.*, 679 F.2d 1350, 1352 (11th Cir. 1982).

²⁵ *Id.* at 1353; *see also* 29 U.S.C. § 216(c).

²⁶ *Lynn's Food Stores*, 679 F.2d at 1355.

²⁷ *Selk v. Pioneers Mem'l Healthcare Dist.*, 159 F. Supp. 3d 1164, 1172 (S.D. Cal. 2016) (internal citations omitted).

Next, the court decides whether the agreement is “fair and reasonable.”²⁸ To this Court’s knowledge, the Ninth Circuit has yet to articulate a test for whether an FLSA settlement is fair and reasonable. As such, this Court will apply the test described by the Southern District of California in *Selk v. Pioneers Memorial Healthcare District*.²⁹ Under *Selk*, the Court will consider the “totality of the circumstances” and, when appropriate, draw on the criteria for class action settlement under Federal Rule of Civil Procedure 23(e).³⁰ This includes the following factors:

“(1) the plaintiff’s range of possible recovery; (2) the stage of proceedings and amount of discovery completed; (3) the seriousness of the litigation risks faced by the parties; (4) the scope of any release provision in the settlement agreement; (5) the experience and views of counsel and the opinion of participating plaintiffs; and (6) the possibility of fraud or collusion.”³¹

Overall, the Court’s primary duty in scrutinizing a settlement agreement is to protect the purpose of the FLSA while balancing the parties’ desire to settle.³²

²⁸ See *Lynn’s Food Stores*, 679 F.2d at 1355.

²⁹ *Selk*, 159 F. Supp. 3d at 1172–73.

³⁰ *Id.* at 1173 (“This approach replicates the factors relevant to Rule 23 class actions where appropriate but adjusts or departs from those factors when necessary to account for the labor rights at issue. This Court adopts a variation of the totality of circumstances approach here.”). As the parties have recognized, drawing on the criteria for a Rule 23 class action settlement does not subject an FLSA collective action settlement to its more exacting standards. See *Beckman v. KeyBank, N.A.*, 293 F.R.D. 467, 476 (S.D.N.Y. 2013). The Court notes that, for the purposes of this Order, it uses the terms “class” and “certification” in an informal sense, as no class is being certified under Rule 23.

³¹ *Selk*, 159 F. Supp. 3d at 1173.

³² *Id.*

III. DISCUSSION

The Court finds that the Revised Agreement represents a fair and reasonable resolution of a bona fide dispute under the FLSA. The parties' supplemental briefing thoroughly details the factors outlined in *Selk*, and shows that the Revised Agreement provides substantial relief to all parties.

A. Bona Fide Dispute

The litigation is in its infancy; however, the parties have engaged in informal discovery regarding the merits of the case and met on several occasions to discuss the legal and factual issues presented by Plaintiffs' claims, Defendant's defenses, and potential issues regarding collective certification.³³ Defendant argues that Plaintiffs are exempt from the overtime requirements of the FLSA as managerial employees under 29 U.S.C. § 213(a)(1).³⁴ Defendant explains that putative Class Members are "white collar supervisors" with exempt and nonmanual duties, that each worker was guaranteed to receive at least \$684 per week, and that payment of a day rate does not undermine the salary requirement of the FLSA's executive exemption.³⁵ Defendant has articulated "the reasons for disputing the employee's rights to a minimum wage or overtime" such that the Court can ensure there exist "legitimate questions about the existence and extent of

³³ Docket 36 at 3; Docket 52 at 13–14 (sealed).

³⁴ Docket 52 at 11 (sealed); *see also* Docket 17 at 5 (mentioning that Plaintiff's position generally is regarded as managerial and supervisory).

³⁵ Docket 52 at 11 (sealed); 29 C.F.R. § 541.

Defendant's FLSA liability.”³⁶ The Court can conclude that a bona fide dispute exists over the right of Plaintiffs to receive overtime pay.

B. Plaintiffs' Range of Possible Recovery

To evaluate the fairness of the settlement amount provided for in the Revised Agreement, the Court must compare it against Plaintiffs' range of possible recovery. Here, Plaintiffs estimated a possible recovery of \$593,873.28 in both unpaid overtime wages and liquidated damages over a two-year period.³⁷ The parties have supported this estimate with data provided by Defendant that reflects the total number of work weeks for each putative Class Member, estimates 20.6 hours of overtime per employee per week, and calculates the value of that overtime.³⁸ The net settlement amount of \$219,008 represents an approximate recovery of 63 percent of Plaintiffs' maximum two-year back wages and approximately 37 percent of the total possible recovery. The Court finds this a fair and reasonable settlement amount, particularly given the risks associated with complex FLSA litigation.³⁹

³⁶ See *Selk* 159 F. Supp. 3d at 1172; *Mamani v. Licetti*, No. 13-CV-7002 KMW JCF, 2014 WL 2971050, at *2 (S.D.N.Y. July 2, 2014) (explaining that to demonstrate a bona fide dispute under the FLSA, “[t]he employer should articulate the reasons for disputing the employee’s right to a minimum wage or overtime, and the employee must articulate the reasons justifying his entitlement to the disputed wages”).

³⁷ Docket 52 at 12 (sealed); Docket 52-6 (sealed).

³⁸ Docket 52-6 (sealed).

³⁹ See *Bellinghausen v. Tractor Supply Co.*, 306 F.R.D. 245, 256 (N.D. Cal. 2015) (finding a wage and hour class settlement fair where the settlement fund represented between 11 percent and 27 percent of the total potential recovery); *Jones v. Agilysys, Inc.*, No. C 12–03516 SBA, 2014 WL 2090034, at *2 (N.D. Cal. May 19, 2014) (finding a FLSA settlement that constituted between 30 percent to 60 percent of recoverable damages to be a “tangible monetary benefit” for the class members).

C. Stage of Proceedings and Seriousness of Litigation Risks

As discussed, the parties have engaged in informal discovery of Defendant's pay records, workweek data for the entire settlement class, and information regarding pay and worktime data extrapolated from Plaintiffs' estimates.⁴⁰ This is sufficient for Plaintiffs to make an "informed decision" about the risks and merits of settlement,⁴¹ particularly given Plaintiffs' counsel's extensive experience in wage and hour class actions.⁴²

D. Release Provisions

The Revised Agreement provides that all Participating Settlement Class Members release any wage-related claims against Defendant for work performed during the Class Period.⁴³ As the Court indicated in its previous Order, this release provision appears fair and reasonable. Additionally, while the FLSA generally guards against broad releases,⁴⁴ the global release governing named Plaintiffs Brewster and Wilson also appears reasonable. Mr. Wilson and Mr. Brewster were represented by counsel during negotiations, are individual signatories to the Revised Agreement, and each receive \$5,000 as consideration for the general release.⁴⁵ Unlike the initial Settlement Agreement, the

⁴⁰ [Docket 52 at 13](#) (sealed).

⁴¹ *See In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 459 (9th Cir. 2000) (emphasizing that the touchstone of the analysis is whether "the parties have sufficient information to make an informed decision about settlement," including formal and informal discovery).

⁴² *See* [Docket 52-3](#) (sealed); [Docket 52-4](#) (sealed); [Docket 52-5](#) (sealed).

⁴³ [Docket 52-1 at ¶ 10\(b\)](#) (sealed); [Docket 53](#) (amendment) (sealed).

⁴⁴ *Moreno v. Regions Bank*, 729 F. Supp. 2d 1346, 1352 (M.D. Fla. 2010) ("[A] pervasive release in an FLSA settlement confers an uncompensated, unevaluated, and unfair benefit on the employer").

⁴⁵ *See Selk v. Pioneers Mem'l Healthcare Dist.*, 159 F. Supp. 3d 1164, 1178–79 (S.D. Cal. 2016) (finding that general release for named plaintiffs was reasonable because named plaintiffs receive additional consideration); *McKeen-Chaplin v. Franklin Am. Mortg. Co.*, No. C 10-5243

Revised Agreement includes opt-in plaintiff Keith Carter in the limited, rather than global, release.⁴⁶ The release provisions are appropriately tailored to the lawsuit, and protect the purposes of the FLSA.

E. Views of Counsel and Participating Plaintiffs

Class counsel has significant experience in collective actions under the FLSA.⁴⁷ Counsel views the Revised Agreement as an “excellent recovery” for Plaintiffs,⁴⁸ and the supplemental briefing provided to the Court supports this opinion. While putative Class Members have not yet been made aware of the Revised Agreement, the parties aver that participating Plaintiffs do not object to the settlement’s terms and explain that Keith Carter was removed as a named plaintiff because he was unable to participate in settlement negotiations.⁴⁹ This factor is satisfied.

F. Fraud or Collusion

The Court requested additional briefing on the pending state court action against Mr. Brewster, as well as Mr. Carter’s role in this litigation that resulted in his global release. As mentioned, Mr. Carter’s general release has been removed from the Revised Agreement. The parties have explained the Brewster Litigation and its independence from this action.⁵⁰ The Court appreciates the parties’ briefing and is satisfied that there is no risk that the settlement was subject to fraud or collusion.

[SBA, 2012 WL 6629608, at *5 \(N.D. Cal. Dec. 19, 2012\)](#) (finding that general release was not fair because plaintiffs were not individually compensated for release of non-wage claims).

⁴⁶ [Docket 53](#) (sealed).

⁴⁷ *See* [Docket 52-3](#) (sealed); [Docket 52-4](#) (sealed); [Docket 52-5](#) (sealed).

⁴⁸ [Docket 52 at 17–18](#) (sealed).

⁴⁹ *Id.* at 17 (sealed).

⁵⁰ *Id.* at 18 (sealed).

G. Service Awards

The Revised Agreement provides that Plaintiffs Brewster and Wilson shall receive \$5,000 “for their efforts in bringing and prosecuting the Action,” and in consideration for the general release.⁵¹ The Court requested clarification on the role Mr. Brewster and Mr. Wilson played in the litigation considering Mr. Carter’s position as named Plaintiff until January 27, 2022. Although not the original named Plaintiffs, the parties explain that Mr. Brewster and Mr. Wilson contributed significant investigative work, faced potential retaliation and future employment risk, and were integral in settlement negotiations.⁵² The Court finds the service awards to be appropriate.

H. Attorney’s Fees and Costs

“Where a proposed settlement of FLSA claims includes the payment of attorney’s fees, the court must also assess the reasonableness of the fee award.”⁵³ The Revised Agreement provides for \$150,000 in attorney’s fees, representing a 40 percent fee award, in addition to \$992 in costs.⁵⁴ The Court requested evidence that provides a factual basis for the award, and Plaintiffs have provided a table of costs,⁵⁵ time records that specify the date, the hours expended, and the nature of the legal work done,⁵⁶ and Class Counsel’s

⁵¹ Docket 52-1 at ¶ 15(a) (sealed).

⁵² Docket 52 at 20 (sealed).

⁵³ *Wolinsky v. Scholastic Inc.*, 900 F. Supp. 2d 332, 336 (S.D.N.Y. 2012).

⁵⁴ Docket 52-1 at ¶ 15(b)(i) (sealed).

⁵⁵ Docket 52-8 (sealed).

⁵⁶ Docket 52-7 (sealed); Docket 52-11 (sealed).

resumes.⁵⁷ Overall, Class Counsel's lodestar calculations total \$61,785, with a 2.43 multiplier to reach \$150,000.⁵⁸

"In 'common-fund' cases where the settlement or award creates a large fund for distribution to the class, the district court has discretion to use either a percentage or lodestar method;" however, courts tend to use the former option.⁵⁹ The district court may also "cross-check[]" the award using both approaches.⁶⁰ The ultimate goal, regardless of method, is to reasonably compensate counsel for their efforts in creating the common fund.⁶¹ In the Ninth Circuit, district courts consider "all of the circumstances of the case," including: (1) the results achieved; (2) the risk of litigation; (3) the skill required and the quality of work; (4) the contingent nature of the fee and the financial burden carried by the plaintiffs; and (5) awards made in similar cases.⁶²

While a 40 percent fee exceeds the Ninth Circuit's benchmark award of 25 percent, the Court finds it appropriate in light of the circumstances and counsel's lodestar calculations.⁶³ As previously discussed, the Revised Agreement provides a substantial economic benefit to the class in the face of complex litigation and a Circuit-split in relevant precedent. Class Counsel are experienced wage-and-hour attorneys working on contingency; as such, the 2.43 multiplier on the loadstar figure is appropriate

⁵⁷ Docket 52-3 (sealed); Docket 52-4 (sealed); Docket 52-5 (sealed).

⁵⁸ Docket 52 at 27 (sealed).

⁵⁹ *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1029 (9th Cir. 1998), *abrogated on other grounds by* *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338 (2011).

⁶⁰ *In re Bluetooth Headset Prod. Liab. Litig.*, 654 F.3d 935, 944 (9th Cir. 2011).

⁶¹ *Paul, Johnson, Alston, & Hunt v. Gaulty*, 886 F.2d 268, 271 (9th Cir. 1989).

⁶² *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1048–50 (9th Cir. 2002).

⁶³ *See id.* at 1048 (finding that the 25 percent benchmark is a starting point for analysis but may not be appropriate in all cases).

given the risk of non-recovery and the skill required.⁶⁴ Further, the multiplier ultimately will decrease with the additional hours spent by counsel implementing the Revised Agreement. While slightly at the upper range, the 40 percent fee and 2.43 multiplier comport with precedent.⁶⁵ The award of costs and attorney's fees is reasonable.

I. Notice and Collective Action Certification

Courts typically do not require collective action certification for approval of FLSA settlement claims; however, the Revised Agreement provides that Plaintiffs shall request that the Court certify the class pursuant to 29 U.S.C. § 216(b) and approve the Notice form.⁶⁶

The Notice provides information regarding the claims made against Defendant, the terms of the Revised Agreement, the recipient's right to share in the settlement award, and the recipient's right to not participate in the settlement.⁶⁷ The Notice contains all appropriate information and gives recipients sixty days to return executed settlement papers. The Court approves its use for the settlement class.

⁶⁴ See *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975), *abrogated on other grounds by City of Burlington v. Dague*, 505 U.S. 557 (1992); see also *Hanlon*, 150 F.3d at 1029 (a lodestar figure "may be adjusted upward or downward to account for several factors including the quality of the representation, the benefit obtained for the class, the complexity and novelty of the issues presented, and the risk of nonpayment").

⁶⁵ See, e.g., *Rippee v. Bos. Mkt. Corp.*, Nos. 05 Civ. 1359, 05 Civ. 1360, 2006 WL 8455400, at *4 (S.D. Cal. Oct. 10, 2006) (approving 40 percent fee and 3.2x multiplier); *Vizcaino*, 290 F.3d at 1051 n.6 (finding that 83 percent of approved class action settlements had fee multipliers between 1.5 and 4); *Steiner v. Am. Broadcasting Co., Inc.*, 248 Fed. App'x 780, 783 (9th Cir. 2007) (finding that multiplier of 6.85 falls within acceptable range).

⁶⁶ Docket 52-1 at ¶ 11(a) (sealed).

⁶⁷ *Id.* at 15–18 (sealed).

The Court also certifies the class for settlement purposes. “Conditional certification requires little more than substantial allegations, supported by declarations or discovery, that the putative class members were together the victims of a single decision, policy, or plan.”⁶⁸ Plaintiffs easily meet the lenient standard for conditional certification: they have alleged that they and other tool pushers were deprived of overtime under Defendant’s single policy to pay such employees on a day rate basis.⁶⁹ Normally, the party opposing certification may move to decertify the class, and at that point, the Court would adopt a stricter standard for whether the putative Class Members are “similarly situated.”⁷⁰ Here, however, the parties have stipulated that, solely for settlement purposes, the requisites for establishing collective action under the FLSA are met.⁷¹ Thus, The Court certifies the class as a collective action under 29 U.S.C. § 216(b) for the purposes of settlement.

IV. CONCLUSION

The Revised Agreement represents a fair and reasonable resolution of a bona fide dispute under the FLSA, and the Joint Motion for Settlement Approval is **GRANTED**. The Court approves the terms and conditions of the Revised Agreement, including its provision that requests the Court to conditionally certify the class and approve the Notice. This case is **DISMISSED WITH PREJUDICE** pursuant to the Revised Agreement.

⁶⁸ *Dualan v. Jacob Transp. Servs., LLC*, 172 F. Supp. 3d 1138, 1144 (D. Nev. 2016) (internal quotation omitted).

⁶⁹ See generally Docket 40.

⁷⁰ *Dualan*, 172 F. Supp. 3d at 1144–45.

⁷¹ Docket 52-1 at ¶ 7 (sealed).

IT IS SO ORDERED this 13th day of May, 2022, at Anchorage, Alaska.

/s/ Joshua M. Kindred
JOSHUA M. KINDRED
United States District Judge

EXHIBIT F

JS-6

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13 *Counsel for Plaintiffs and Settlement Classes*

14
15 **UNITED STATES DISTRICT COURT**
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
17 **SOUTHERN DIVISION**

18 Case No. 8:13-cv-00092-DOC(JPRx)

19 MELISSA LILLEHAGEN, *et*
20 *al.*, on behalf of themselves and
all those similarly situated,

21 Plaintiffs,

22 v.

23 ALORICA, INC.,

24 Defendant.

**ORDER GRANTING FINAL
APPROVAL OF SETTLEMENT [264]**

District Judge: Hon. David O. Carter
Magistrate Judge: Hon. Jean Rosenbluth

1 On December 5, 2016, a hearing was held on Plaintiffs' and Class Counsel's
2 unopposed motion for final approval of the class settlement; and on the separate
3 motion of Plaintiffs and Class Counsel for Attorneys' Fees, Costs, and Class
4 Representative Service Awards.

5 The Parties have submitted their Class Action Settlement Agreement ("the
6 Settlement"), which this Court preliminarily approved on May 31, 2016 (the
7 "Preliminary Approval Order") (Dkt. 262.). In accordance with the Preliminary
8 Approval Order, Class Members have been given notice of the terms of the
9 Settlement and the opportunity to object to the settlement and/or opt out. In
10 addition, pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715
11 ("CAFA"), Alorica has given the Attorney General of the United States and the
12 appropriate state officials in the states in which the Class Members reside sufficient
13 notice and opportunity to be heard concerning the Settlement. The Court is
14 therefore empowered under CAFA to finally approve the Settlement.

15 Having received and considered the Settlement, the supporting papers filed
16 by the Parties, and the evidence and argument received by the Court at the final
17 approval hearing on December 5, 2016, by means of this order (the "Final Approval
18 Order") the Court grants final approval to the Settlement, and HEREBY ORDERS
19 and MAKES DETERMINATIONS as follows:

20 **Definitions**

21 1. Except as otherwise specified herein, the Court, for purposes of this
22 Final Approval Order, adopts all defined terms set forth in the Settlement.

23 **Jurisdiction**

24 2. This Court has jurisdiction over the subject matter of this litigation and
25 all related matters and all state and federal claims raised in this action and released
26 in the Settlement, and personal jurisdiction over Alorica and all Class Members
27 (except for those who timely filed opt out requests). Specifically, this Court has
28

1 federal question jurisdiction over this action pursuant to 28 U.S.C. section 1331 and
2 section 16(b) of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b).

3 3. This Court also has supplemental jurisdiction over all state-law claims
4 asserted by Plaintiffs because the state-law claims derive from a common nucleus
5 of operative fact and form part of the same case or controversy as those claims over
6 which the Court has primary jurisdiction. *See* 28 U.S.C. § 1367 (providing for
7 supplemental jurisdiction over related state-law claims that “form part of the same
8 case or controversy”); *United Mine Workers v. Gibbs*, 383 U.S. 715, 726 (1996)
9 (holding that federal courts have supplemental jurisdiction over state law claims
10 that arise from the same “common nucleus of operative fact” such that the parties
11 “would ordinarily be expected to try them all in one judicial proceeding”).

12 4. This Court also has jurisdiction to approve the Settlement’s release of
13 claims by Class Members over which the Court has jurisdiction, even if the Court
14 would not independently have jurisdiction over those released claims. *See Reyn’s*
15 *Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d 741, 748 (9th Cir. 2006) (quoting
16 *Class Plaintiffs v. City of Seattle*, 955 F.2d 1268, 1287-88 (9th Cir. 1992) (“[A]
17 federal court may release not only claims alleged in the complaint, but also state
18 claims arising from the same nucleus of operative facts over which the court would
19 not have jurisdictional competence.”).

20 **Dissemination of Notice to Class Members**

21 5. Pursuant to the Preliminary Approval Order, notice was sent to each
22 Class Member by first-class mail. The notice was clear and organized, following
23 the model forms provided by the Federal Judicial Center at www.fjc.gov. The
24 notice materials informed Class Members of the terms of the Settlement, how their
25 settlement share would be calculated, how to receive their settlement share, how to
26 challenge the pre-printed data provided by Alorica that would be used to calculate
27 their settlement share, their right to comment on (including object to) the Settlement
28

1 or opt out of the Settlement to pursue their claims individually, and their right to
2 appear in person or by counsel at the final approval hearing and be heard regarding
3 approval of the Settlement. Adequate periods of time were provided by each of
4 these procedures.

5 6. The Court finds and determines that this notice procedure afforded
6 adequate protections to Class Members and provides the basis for the Court to
7 make an informed decision regarding approval of the Settlement based on the
8 responses of Class Members. Notice was accomplished in the manner prescribed
9 by the Settlement. The Court finds and determines that the notice provided in this
10 case was the best notice practicable, which satisfied the requirements of law and
11 due process.

12 **Notice to Attorneys General Pursuant to CAFA**

13 7. On September 6, 2016, Alorica served upon the Attorney General of
14 the United States and the appropriate state officials of the states in which the Class
15 Members reside a notice of the Settlement consisting of: a copy of the complaints in
16 this action; the Preliminary Order certifying Settlement Classes, appointing Class
17 Representatives and Class Counsel, granting preliminary approval of the proposed
18 Settlement, appointing the Settlement Administrator and dissemination of Notice,
19 and setting the Fairness Hearing and related dates; copies of the Settlement; the
20 Class Notice; and the names of Class Members and their estimated proportionate
21 share of the entire Settlement. The Notice of Settlement also invited comment on
22 the Settlement. This Final Approval Order is being entered at least 90 days after
23 the later of the dates on which the appropriate federal and state officials were
24 served with the notice of proposed settlement. None of the federal or state officials
25 who were served have asserted objections or requests for hearings during this time
26 period.

27 8. The Court finds and determines that the substance of CAFA's notice
28

1 requirements have been satisfied. *See In re Processed Egg Prod. Antitrust Litig.*,
2 284 F.R.D. 249, 258 (E.D. Pa. 2012); *Kirven v. Cent. States Health & Life Co. of*
3 *Omaha*, No. 11 Civ. 2149, 2015 WL 1314086, at *10 (D.S.C. Mar. 23, 2015); *Kay*
4 *Co. v. Equitable Prod. Co.*, No. 06 Civ. 00612, 2010 WL 173486, at *4 (S.D.W.Va.
5 Apr. 28, 2010). Accordingly, 28 U.S.C. section 1715(e) is inapplicable. *See*
6 *Adoma v. Univ. of Phoenix, Inc.*, 913 F. Supp. 2d 964, 972–73 (E.D. Cal. 2012)
7 (class members could not refuse to be bound by settlement agreement in FLSA
8 class action simply because employer was late in providing notice, where employer
9 served proper notice under CAFA and more than 90 days had passed since date
10 notice was served).

11 **Certification Under Fed. R. Civ. P. 23 and the FLSA**

12 9. For the reasons stated in the Preliminary Approval Order, this Court
13 finds and determines that the proposed Settlement Class, as defined in the
14 definitions section of the Settlement and in section II of its Preliminary Approval
15 Order, meets all of the legal requirements for class certification under Federal Rule
16 of Civil Procedure 23 (“Rule 23”) (a) and (b)(3), and it is hereby ordered that the
17 Settlement Class is finally approved and certified as a Class for purposes of
18 settlement of this action.

19 10. For the reasons stated in the Preliminary Approval Order, this Court
20 finds and determines that the action meets all of the legal requirements for
21 certification as a collective action under section 16(b) of the FLSA, 29 U.S.C. §
22 216(b), for the three-year period preceding the filing of Plaintiffs’ complaint, and it
23 is hereby ordered that the action is certified as a collective action for purposes of
24 settlement of this action.

25 **Fairness**

26 11. Pursuant to Rule 23(e), the Court further finds and determines that the
27 terms of the Settlement are fair, reasonable and adequate to the Class and to each
28

1 Class Member and that the Class Members who have not opted out will be bound
2 by the Settlement, that the Settlement is ordered finally approved, and that all terms
3 and provisions of the Settlement should be and hereby are ordered to be
4 consummated. The Court specifically finds that the Settlement is rationally related
5 to the strength of Plaintiffs' claims given the risk, expense, complexity, and
6 duration of further litigation. The Court also finds that the Settlement is the result
7 of arms-length negotiations between experienced counsel representing the interests
8 of the Class Members and Alorica, under the supervision of an independent third-
9 party mediator, after thorough factual and legal investigation. *Staton v. Boeing*, 327
10 F.3d 938, 960 (9th Cir. 2003); *Class Plaintiffs*, 955 F.2d at 1291.

11 12. The Court finds and determines that the payments to be made to the
12 Class Members as provided for in the Settlement are fair and reasonable. The
13 proposed plan of allocation bases each Class Member's recovery on: (a) the number
14 of weeks during the Covered Period worked by the Class Member, and (b) whether
15 the Class Member worked in California or another state. The plan of allocation is
16 rational. The Court hereby gives final approval to and orders the payment of those
17 amounts be made to Class Members out of the \$9,250,000 Settlement fund in
18 accordance with the terms of the Settlement.

19 **Class Member Response**

20 13. The Court further finds that the response of the Class Members to the
21 Settlement supports settlement approval. Of the approximately 156,000 Class
22 Members, only 16 timely opted out of the Settlement. Only two Class Members
23 objected to the Settlement. The first objection is overruled because it criticizes the
24 Settlement for not including claims or grievances that are outside the scope of the
25 case and does not provide sufficient detailed factual assertions or any legal
26 argument to support its position, and it was submitted anonymously, precluding the
27 parties and the Court from seeking clarification from the objector[s]; the second
28

1 objection is also overruled because it merely states that, in the class member's view,
2 he was properly paid, and therefore does not challenge the fairness, reasonableness,
3 or adequacy of the Settlement.

4 **Appointment of Class Representatives and Approval of Class**

5 **Representative Awards**

6 14. The Court confirms as final the appointment of Melissa Lillehagen,
7 Sharon Shaw, Janna Carlile, Shanai Whitmore, Ignacio Pizana, Brenda Luper,
8 Barbara Beckerley, Dianne Maddox, Dawn Fulmore, Ancelle Parker, Raymorn
9 Edden, Janelle Ayers, Cynthia Fuerte, Chelsea Ramirez, and Timothy King as Class
10 Representatives of the FLSA Collective; Barbara Beckerley and Michael Irvin as
11 Class Representatives of the California Rule 23 Class; Dianne Maddox as Class
12 Representative of the Florida Rule 23 Class; Raymorn Edden as Representative of
13 the Georgia Rule 23 Class; Cassandra Allen and Sharon Shaw as Class
14 Representative of the Oklahoma Rule 23 Class; Dawn Fulmore as Class
15 Representative of the Pennsylvania Rule 23 Class; Vanessa Gomez as Class
16 Representative of the Texas Rule 23 Class; Ancelle Parker as Class Representative
17 of the Virginia Rule 23 Class; Janelle Ayers as Class Representative of the Iowa
18 Rule 23 Class; Cynthia Fuerte as Class Representative of the North Carolina Rule
19 23 Class; Chelsea Ramirez as the Class Representative of the Kansas Rule 23 Class,
20 and Timothy King as the Class Representative of the Colorado Class. In its Order
21 Granting Motion for Award of Attorneys' Fees, Costs, and Class Representative
22 Service Awards entered on December 5, 2016 ("Fee Order"), the Court has already
23 approved the requested Class Representative Awards.

24 **Appointment of Class Counsel; Approval of Attorneys' Fees and Costs**

25 15. The Court confirms as final the appointment of the following law firms
26 and attorneys as class counsel ("Class Counsel") for the Rule 23 and FLSA Classes:
27 Allen R. Vaught of Baron & Budd P.C., Jahan C. Sagafi and Katrina L. Eiland of
28

1 Outten & Golden LLP and Robert P. Kondras of Hunt, Hassler, & Lorenz LLP. In
2 its December 5, 2016 Fee Order, the Court approved Class Counsel's requested fees
3 and costs.

4 **Release**

5 16. By operation of the entry of this Final Approval Order and pursuant to
6 the Settlement, all Participating Class Members are permanently barred from
7 prosecuting against Alorica any Participating Class Member Released Claim as set
8 forth in section VII of the Settlement. The Court has reviewed the release in
9 section VII of the Settlement and finds it to be fair, reasonable, and enforceable
10 under Rule 23, the FLSA, and all other applicable law.

11 **Costs of Administration**

12 17. Class Administrators, Garden City Group, LLC, have indicated that
13 the costs of administering the settlement likely will greatly exceed the \$250,000
14 estimate this Court was presented with in the Motion for Preliminary Approval. *See*
15 Declaration of Loree Kovach of Garden City Group, LLC (Dkt. 272). Payments
16 out of the class members' recovery for the costs of administering the settlement are
17 capped at \$250,000. Payments beyond \$250,000 made to Garden City Group or any
18 other administrator in connection with administering this settlement will be made
19 by class counsel out of their fee award.

20 **Final Judgment and Dismissal**

21 18. By means of this Final Approval Order, this Court hereby enters final
22 judgment in this action, as defined in Federal Rule of Procedure 58(a)(1).

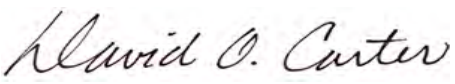
23 19. Without affecting the finality of the Court's judgment in any way, the
24 Court retains jurisdiction over this matter for purposes of resolving issues relating
25 to the interpretation, administration, implementation, effectuation and enforcement
26 of the Settlement. Nothing in this Final Approval Order will preclude any action to
27 enforce the Parties' obligations under the Settlement or under this order, including
28

1 the requirement that Alorica make the Settlement Payment in accordance with the
2 terms of the Settlement.

3 20. The Parties are hereby ordered to comply with the terms of the
4 Settlement.

5 21. This action is dismissed with prejudice, each side to bear its own costs
6 and attorneys' fees except as provided by the Settlement and the Court's orders.
7

8
9 Dated: December 5, 2016



The Honorable David O. Carter
United States District Judge

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17 *Counsel for Plaintiffs and Settlement Class Members*

18 **UNITED STATES DISTRICT COURT**
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
20 **SOUTHERN DIVISION**

21 MELISSA LILLEHAGEN, *et*
22 *al.*, on behalf of themselves and
23 all those similarly situated,
24 Plaintiffs,
25 v.
26 ALORICA, INC.,
27 Defendant.

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Case No. 8:13-cv-00092-DJC(JPRx)

**SUPPLEMENTAL DECLARATION OF
JAHAN C. SAGAFI IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR FINAL
APPROVAL AND FOR ATTORNEYS'
FEES, COSTS, AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

District Judge: Hon. David O. Carter
Magistrate Judge: Hon. Jean Rosenbluth

1 I, JAHAN C. SAGAFI, declare as follows:

2 1. I am a partner at Outten & Golden, LLP (“O&G”), Class Counsel in
3 the above-captioned action. I make these statements based on personal knowledge
4 and would so testify if called as a witness.

5 2. This Supplemental Declaration is submitted in support of Plaintiffs’
6 Motion for Final Approval of Settlement (“Final Approval Motion”) and Plaintiffs’
7 Motion for Award of Attorneys’ Fees, Reimbursement of Costs and Expenses, and
8 Award of Class Representative Awards (“Fee Motion”).

9 3. I am a member in good standing of the bar of the State of California,
10 as well as the U.S. District Court for the Central District of California.

11 **Time Invested by Class Counsel**

12 4. As of September 28, 2016, O&G had expended 3662.67 hours on this
13 matter, with work still continuing, and expected to continue through 2016 and into
14 2017. The firm’s total lodestar is \$1,413,303.90. Attached hereto as **Exhibit A** is a
15 true and correct summary of the hours, billing rate, and lodestar for each biller’s
16 work on this matter. The updated lodestar increased from the figure in the Fee
17 Motion as a result of time spent overseeing the administration of the settlement,
18 conferring with the Settlement Administrator, responding to class member
19 inquiries, and preparing for the final fairness hearing. (*See* Dkt. 245.) This figure
20 does not reflect some recent time entries because processing of all data is not
21 complete.

22 5. O&G has incurred \$61,108.76 in costs as of September 28, 2016. This
23 is a slight increase from the amount stated in the Fee Motion. *See id.* Class
24 Counsel incurred these costs for the Class’s benefit. They include the filing fee,
25 mediation fees, and expenses for photocopying, telephone conference calls,
26 mailings, travel, and other reasonable, litigation-related costs. The amount is
27 reasonable in light of the complexity and size of the action. Class Counsel will
28 continue to incur additional costs through the conclusion of this matter. Although,

collectively, Class Counsel have incurred significantly more than \$390,000 in costs, Class Counsel have agreed to limit their cost reimbursement request to \$390,000 as set forth in the notice, so Class Counsel will simply not be reimbursed for some of these costs. Attached hereto as **Exhibit B** is a true and correct summary of the costs incurred by O&G. To date, the firm has not received any reimbursement for its out-of-pocket costs.

6. The following is a summary of the lodestar and cost information for each of the three firms comprising Class Counsel, as set forth in this declaration and the declarations of Allen Vaught and Robert Kondras, filed herewith:

Class Counsel firm	Lodestar	Costs
Baron & Budd	\$2,371,731.50	\$310,895.04
Outten & Golden	\$1,413,303.90	\$61,108.76
Hunt, Hassler & Lorenz	\$275,800.00	\$32,159.21
Total	\$4,060,835.40	\$404,163.01

B&B's correct, updated lodestar figure is slightly lower than the lodestar submitted with the Fee Motion due to an error in the original figure, which has now been corrected.

Class Member Response to the Settlement

7. The class's response to the notice has been exceptionally positive. Of the approximately 156,000 Class Members to whom notices were mailed, 16 opted out before the deadline, 1 opted out after the deadline, and 2 objected (both before the deadline). Alorica has stated that it does not wish to allow the late opt-out to opt out.

8. On September 12, 2016, Class Member Susan Rush emailed the Settlement Administrator to comment on the Settlement. On October 3, 2016, my firm spoke to Ms. Rush and clarified that, with her comment, she was neither objecting to the Settlement nor attempting to opt-out.

1 **Class Counsel Will Continue to Work for the Class**

2 9. In my experience, administering class settlements of this nature and
3 size requires a substantial and ongoing commitment, long after final approval is
4 granted. O&G and Baron & Budd will continue to invest time and incur costs over
5 the next several months preparing for and attending the fairness hearing, overseeing
6 the administration of the Settlement, conferring with the Settlement Administrator,
7 and responding to inquiries from Class Members.

8 **Administration of the Notice to the Class**

9 10. In my prior declaration submitted in support of Plaintiffs' Final
10 Approval Motion and Fee Motion, I mistakenly stated that the class notice packets
11 sent to Class Members comprised "the Class Notice and exclusion forms." This
12 was incorrect, because the Settlement Agreement does not call for exclusion forms,
13 so none were sent to Class Members.

14 **CAFA Compliance**

15 11. On August 31, 2016, I asked Alorica to provide details about its
16 compliance with CAFA's notice requirements under 28 U.S.C. § 1715(d). Alorica
17 explained that it had not sent the notice. I then worked with Alorica and the
18 Settlement Administrator, Garden City Group LLP ("GCG"), to ensure that the
19 CAFA notice was sent as soon as possible.

20 12. GCG has informed me that on September 6, 2016, it served notice of
21 the settlement on the U.S. Attorney General and state Attorneys General pursuant to
22 CAFA, on behalf of Alorica. GCG served the following documents: a copy of the
23 complaints in this action; the Preliminary Order certifying Settlement Classes,
24 appointing Class Representatives and Class Counsel, granting preliminary approval
25 of the proposed Settlement, appointing the Settlement Administrator and
26 dissemination of Notice, and setting the Fairness Hearing and related dates; copies
27 of the Settlement; the Class Notice; and the names of Class Members and their
28 estimated proportionate share of the entire Settlement. The Notice of Settlement

1 also invited comment on the Settlement. CAFA's ninety-day notice period will
2 expire on December 5, 2016.

3 13. The parties have not agreed on whether Alorica will bear the cost of
4 this notice or if it will come from the Settlement Fund.

5 14. Plaintiffs and Alorica are negotiating an agreement whereby Alorica
6 will fund the Settlement close to the originally scheduled date (around
7 Thanksgiving), to minimize the harm to the Class Members and Class Counsel
8 from the delay caused by the error in CAFA notice dissemination.

9 **Additional Exhibits**

10 15. Attached hereto as **Exhibit C** is a true and correct copy of Class
11 Member Cynthia Jones's comment on the Settlement.

12 16. Attached hereto as **Exhibit D** is a true and correct copy of Class
13 Member Susan Rush's comment on the Settlement.

14 I declare, under penalty of perjury, under the laws of the State of California
15 that the foregoing is true and correct. Executed this 3rd day of October 2016 at San
16 Francisco, California.

17 

18 _____
19 Jahan C. Sagafi

Exhibit A

Lillehagen, #135864 Torica, Inc.

Case No. 8:13-cv-00092-DOC (JPRx)

Outten Golden LLP - Fee Summary

OUTTEN & GOLDEN LLP		
	Hours	Fees
Attorneys	3538.27	\$1,384,235.65
Support Staff	124.40	\$29,068.25
Grand Total	3662.67	\$1,413,303.90

ATTORNEYS					
Name	Initials	Position	Hours	Rate	Total
Adrien L. Porter	ALP	Associate	2.50	\$ 235.00	\$ 587.50
Ashley Pellouchoud	AP	Associate	819.52	\$ 270.00	\$ 221,270.40
Benjamin J. Fuchs	BJF	Law Clerk	289.10	\$ 240.00	\$ 69,384.00
Barbara S. Saavedra	BSS	Contract Attorney	41.20	\$ 450.00	\$ 18,540.00
Christopher M. McNerney	CMM	Associate	0.50	\$ 350.00	\$ 175.00
Carmelyn P. Malalis	CPM	Partner	0.60	\$ 590.00	\$ 354.00
Danica Li	DXL	Contract Attorney	23.90	\$ 270.00	\$ 6,453.00
Douglas M. Kelly	DMK	Associate	26.40	\$ 270.00	\$ 7,128.00
Daniel Stromberg	DXS	E-Discovery Counsel	0.50	\$ 550.00	\$ 275.00
Gail L. Chung [CA]	GLCA	Associate	3.30	\$ 550.00	\$ 1,815.00
Jahan C. Sagafi	JCS	Partner	678.20	\$ 750.00	\$ 508,650.00
Jennifer Liu [CA]	JLCA	Associate	0.40	\$ 400.00	\$ 160.00
Justin Swartz	JMS	Partner	0.40	\$ 775.00	\$ 310.00
Julia X. Rabinovich	JXR	Associate	62.10	\$ 350.00	\$ 21,735.00
Katrina L. Eiland	KLE	Associate	855.50	\$ 400.00	\$ 342,200.00
Lewis Steel	LS	Of Counsel	0.20	\$ 850.00	\$ 170.00
Marco A. Lopez	MAL	Contract Attorney	48.80	\$ 360.00	\$ 17,568.00
Michael J. Scimone	MJS	Associate	0.10	\$ 425.00	\$ 42.50
Melissa L. Stewart	MLS	Associate	0.20	\$ 425.00	\$ 85.00
Michael N. Litrownik	MNL	Associate	1.10	\$ 400.00	\$ 440.00
Natalie Alameddine	NA	Associate	37.35	\$ 250.00	\$ 9,337.50
NY Law Clerk	NYLC	Law Clerk	157.05	\$ 235.00	\$ 36,906.75
Paul W. Mollica	PWM	Of Counsel	4.40	\$ 725.00	\$ 3,190.00
Rachel Bien	RBCA	Partner	5.60	\$ 300.00	\$ 1,680.00
Riley R. Moyer	RRM	Associate	1.20	\$ 270.00	\$ 324.00
Samantha Elboim	SE	Contract Attorney	314.45	\$ 240.00	\$ 75,468.00
SF Law Clerk	SFLC	Law Clerk	149.30	\$ 235.00	\$ 35,085.50
Sally J. Abrahamson	SJA	Associate	0.50	\$ 425.00	\$ 212.50
Tanisha Shafer-Arata	TSA	Associate	4.50	\$ 290.00	\$ 1,305.00
Warren Astbuty	WA	Associate	9.40	\$ 360.00	\$ 3,384.00
Total			3538.27	\$	1,384,235.65

Lillehagen, #13588 Alorica, Inc.

Case No. 8:13-cv-00092-DOC (JPRx)

Outten Golden LLP - Fee Summary

SUPPORT STAFF				
Name	Initials	Hours	Rate	Total
Legal Administrator	ADM	7.35	\$ 200.00	\$ 1,470.00
Andrew Amoranto	AXA	15.40	\$ 235.00	\$ 3,619.00
Guy Mathews	GJM	0.20	\$ 235.00	\$ 47.00
Jeffrey M. Domanico	JMD	0.90	\$ 235.00	\$ 211.50
Jessica R. Lyons	JRL	41.80	\$ 235.00	\$ 9,823.00
LiAnne P. Chan	LPC	1.50	\$ 235.00	\$ 352.50
Mei Xuan	MXX	8.55	\$ 235.00	\$ 2,009.25
Michelle T. Leung	MTL	3.30	\$ 275.00	\$ 907.50
Marisa Hendriksen	MXH	2.30	\$ 235.00	\$ 540.50
Part Time Paralegal	PTP	2.70	\$ 220.00	\$ 594.00
Stephanie Brooks	SB	0.90	\$ 235.00	\$ 211.50
Season Hurst	SH	39.50	\$ 235.00	\$ 9,282.50
Total		124.40		\$ 29,068.25

EXHIBIT G

14648 Reginald Moore et al v. Allied

DATE	VENDOR	QTY	PRICE PER	DESCRIPTION	AMOUNT
11/5/2019	Pay.gov			Filing fee	400.00
11/6/2019	LWDA			Filing fee	75.00
11/6/2019	State Bar of Texas			Certificates - RJP	50.00
11/6/2019	State Bar of Texas			Certificates - TS	50.00
11/7/2019	Pay.gov			Filing fee	400.00
11/7/2019	Pay.gov			Filing fee	400.00
2/15/2020	First Legal Network			Court costs	279.00
2/16/2020	All Access Process			Court costs	55.00
2/20/2020	Federal Express			Delivery	52.30
4/30/2020	First Legal Network			Court costs	139.10
4/30/2020	First Legal Network			Court costs	139.10
4/30/2020	First Legal Network			Court costs	138.00
4/30/2020	Susan Cavanaugh			Overtime	85.06
5/15/2020	First Legal Network			Court costs	270.50
5/19/2020	Moe's Process Serving, Inc.			Court service	50.00
5/29/2020	Moe's Process Serving, Inc.			Court service	1,003.00
5/29/2020	Moe's Process Serving, Inc.			Court service	50.00
6/3/2020	Sacramento Superior Court			Documents	4.00
6/11/2020	Sacramento Superior Court			Documents	1.00
6/11/2020	Supreme Court of California			RJP ad hoc	500.00
6/12/2020	Court Call			Court call	94.00
6/12/2020	Moe's Process Serving, Inc.			Court service	119.30
6/12/2020	Moe's Process Serving, Inc.			Court service	50.00
6/19/2020	Court Call			Court call cancelled	(94.00)
6/19/2020	Court Call			Court call	94.00
6/19/2020	Moe's Process Serving, Inc.			Court service	50.00
6/19/2020	Sacramento Superior Court			Documents	3.00
6/22/2020	Phoenix Settlement Administrators			Class administrative services	200,000.00
7/2/2020	Federal Express			Delivery	41.99
7/2/2020	Moe's Process Serving, Inc.			Court service	50.00
7/2/2020	Moe's Process Serving, Inc.			Court service	50.00
7/2/2020	Sacramento Superior Court			Documents	3.00
7/7/2020	Moe's Process Serving, Inc.			Court service	50.00
7/7/2020	Moe's Process Serving, Inc.			Court service	50.00
7/7/2020	Sacramento Superior Court			Documents	110.00
7/14/2020	Court Call			Court call	94.00
7/14/2020	Court Call			Court call	94.00
7/15/2020	First Legal Network			Court costs	259.00
7/15/2020	First Legal Network			Court costs	175.00
7/16/2020	Sacramento Superior Court			Documents	10.60
7/17/2020	Sacramento Superior Court			Documents	5.80
7/17/2020	Sacramento Superior Court			Documents	2.00
7/27/2020	Court Call			Court call	(94.00)
8/3/2020	Moe's Process Serving, Inc.			Court service	50.00
8/4/2020	First Legal Depositions			Court reporter	750.00
8/6/2020	Moe's Process Serving, Inc.			Court service	50.00
8/13/2020	Sacramento Superior Court			Documents	21.20
8/14/2020	Moe's Process Serving, Inc.			Court service	64.00
8/14/2020	Sacramento Superior Court			Documents	2.00
8/15/2020	First Legal Network			Court costs	66.00
8/27/2020	Sacramento Superior Court			Documents	6.20
10/2/2020	Susan Cavanaugh			Overtime	42.53
10/26/2020	Lynn Cohn			Mediation (see 3/31/21)	-
10/29/2020	Aptus Court Reporting			Court reporter	531.85
10/29/2020	Aptus Court Reporting			Court reporter	473.45
10/29/2020	Aptus Court Reporting			Court reporter	399.00
10/30/2020	Aptus Court Reporting			Court reporter	725.30
10/30/2020	Aptus Court Reporting			Court reporter	652.30
10/30/2020	Aptus Court Reporting			Court reporter	100.00
10/30/2020	Aptus Court Reporting			Court reporter	534.80
10/30/2020	Aptus Court Reporting			Court reporter	489.60
10/30/2020	Aptus Court Reporting			Court reporter	339.55
2/1/2021	Moe's Process Serving, Inc.			Court service	50.00
2/10/2021	Court of Appeal, Third Appellate District			Filing fee	775.00
2/24/2021	Sacramento Superior Court			Documents	7.40
2/24/2021	Sacramento Superior Court			Documents	12.00
2/24/2021	TrueFiling			Filing fee	21.00
2/26/2021	Aptus Court Reporting			Court reporter	530.00
3/1/2021	Moe's Process Serving, Inc.			Court service	50.00
3/17/2021	Stohler ADR PLLC			Mediation	2,500.00
3/31/2021	Lynn Cohn			Mediation	9,062.50
5/2/2021	Stohler ADR PLLC			Mediation	4,550.00
5/6/2021	TrueFiling			Filing fee	21.00
10/28/2021	Law Office of Thomas J. Crane			Arbitration services	2,500.00
12/31/2021	First Legal Network			Court costs	113.50
2022	Phoenix Settlement Administrators			Class administrative services	265,000.00
6/10/2022	SLS			research	150.00
6/10/2022	SLS			postage	134.80
6/10/2022	SLS		25.00	CD copies	-
6/10/2022	SLS	0	1.00	fax pages	-
6/10/2022	SLS	392	0.25	black/white printing and copies	98.00
6/10/2022	SLS	0	0.40	color printing and copies	-
TOTAL EXPENSES AS OF 06/10/22					\$ 31,231.73 \$ 465,000.00
					\$ 496,231.73

RJP Moore-
14648

All Access Process
1242 University Avenue #6-564
Riverside, CA 92507

INVOICE: 4306858
Issued: Feb 16, 2020

Shellist | Lazarz | Slobin LLP
Susan Cavanaugh
11 Greenway Plz Suite 1515
Houston, TX 77046

PAY TO:
All Access Process
1242 University Avenue #6-564
Riverside, CA 92507

Case: N/a	Plaintiff / Petitioner: N/a
Job: 4306858	Defendant / Respondent: N/a

Item	Description	Cost	Quantity	Total
Courtesy Copy	Courtesy copy delivery to: United States District Court 3470 12 St., Riverside, CA 92501 2/14/2020 1:47PM	\$55.00	1	\$55.00

Thanks for your business. Invoices are due upon receipt.	Total: \$55.00
	Amount Paid: (\$0.00)
	Balance Due: \$55.00



ALL ACCESS PROCESS

All Access Process • 1242 University Avenue #6-564, Riverside, CA 92507

Call: 9514429111 • Fax: 951-823-5714 • Email: allaccessprocess@gmail.com • Visit: <https://www.allaccessprocessserving.com/>

INVOICE

Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego CA 92101
Phone:866-999-8310 Fax:619-546-9152

Invoice No.	Invoice Date	Job No.
1075641	10/29/2020	10073453
Job Date	Case No.	
10/9/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

Todd Slobin
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston TX 77046

1 CERTIFIED COPY OF TRANSCRIPT OF:

Meyloni Hewitt

531.85

TOTAL DUE >>>

\$531.85

Thank you, your business is greatly appreciated.

Aptus Court Reporting - CA, LLC. Customer is ultimately responsible for payment within our terms.

TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:
APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits: 0.00

(+) Finance Charges/Debits: 0.00

(=) New Balance: **531.85**

Tax ID: 27-4460942

Phone: (713) 352-3433 Fax:

Please detach bottom portion and return with payment.

Todd Slobin
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston TX 77046

Job No. : 10073453 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1075641 Invoice Date : 10/29/2020
Total Due : \$531.85

Remit To: **Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego CA 92101**

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

EXHIBIT 9

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101
Phone: 866-999-8310 Fax: 619-546-9152

Ricardo Prieto, Esq.
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1075595	10/29/2020	10073209
Job Date	Case No.	
10/2/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

John Calhoun

Technology Package (Electronic Files)

Condensed Transcript

Video Stream

Production/Processing

Shipping/Handling

53.00	Pages	@	3.65	193.45
1.00		@	55.00	55.00
1.00		@	30.00	30.00
3.00		@	100.00	300.00
1.00		@	50.00	50.00
1.00		@	45.00	45.00

TOTAL DUE >>> \$673.45

Location of Job : Remote deposition

Thank you, your business is greatly appreciated.

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APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits:	200.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$473.45

Tax ID: 27-4460942

Please detach bottom portion and return with payment.

Ricardo Prieto, Esq.
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10073209 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1075595 Invoice Date : 10/29/2020
Total Due : \$473.45

Remit To: **Aptus Court Reporting**
Corporate Office
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San Diego, CA 92101

PAYMENT WITH CREDIT CARD



Cardholder's Name:	
Card Number:	
Exp. Date:	Phone#:
Billing Address:	
Zip:	Card Security Code:
Amount to Charge:	
Cardholder's Signature:	
Email:	

EXHIBIT 9

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
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Ricardo Prieto, Esq.
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1075592	10/29/2020	10073208
Job Date	Case No.	
10/2/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Christina Tinsley

Technology Package (Electronic Files)

Condensed Transcript

Production/Processing

Shipping/Handling

60.00	Pages	@	3.65	219.00
1.00		@	55.00	55.00
1.00		@	30.00	30.00
1.00		@	50.00	50.00
1.00		@	45.00	45.00

TOTAL DUE >>>

\$399.00

Location of Job : Remote deposition

Thank you, your business is greatly appreciated.

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APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits:	0.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$399.00

Tax ID: 27-4460942

Please detach bottom portion and return with payment.

Ricardo Prieto, Esq.
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10073208 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection
Service, et al.
Invoice No. : 1075592 Invoice Date : 10/29/2020
Total Due : \$399.00

PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:

Remit To: **Aptus Court Reporting**
Corporate Office
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San Diego, CA 92101

EXHIBIT 9

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Ricardo Prieto, Esq.
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston TX 77046

Invoice No.	Invoice Date	Job No.
1075540	10/30/2020	10073340
Job Date	Case No.	
10/7/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Conan Thompson

725.30

TOTAL DUE >>>

\$725.30

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TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:

APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits: 0.00

(+) Finance Charges/Debits: 0.00

(=) New Balance: **725.30**

Tax ID: 27-4460942

Phone: (713) 352-3433 Fax:

Please detach bottom portion and return with payment.

Ricardo Prieto, Esq.
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston TX 77046

Job No. : 10073340 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1075540 Invoice Date : 10/30/2020
Total Due : \$725.30

Remit To: **Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego CA 92101**

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

EXHIBIT 9

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
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San Diego, CA 92101
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Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1075925	10/30/2020	10073626
Job Date	Case No.	
10/14/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Brittani Randolph

Technology Package (Electronic Files)

Condensed Transcript

Video Stream

Production/Processing

Shipping/Handling

102.00	Pages	@	3.65	372.30
1.00		@	55.00	55.00
1.00		@	30.00	30.00
2.00		@	100.00	200.00
1.00		@	50.00	50.00
1.00		@	45.00	45.00

TOTAL DUE >>> \$752.30

Location of Job : Remote deposition

Thank you, your business is greatly appreciated.

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APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits: 100.00
(+) Finance Charges/Debits: 0.00
(=) New Balance: **\$652.30**

Tax ID: 27-4460942

Please detach bottom portion and return with payment.

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10073626 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1075925 Invoice Date : 10/30/2020
Total Due : \$652.30

Remit To: **Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101**

PAYMENT WITH CREDIT CARD



Cardholder's Name:	
Card Number:	
Exp. Date:	Phone#:
Billing Address:	
Zip:	Card Security Code:
Amount to Charge:	
Cardholder's Signature:	
Email:	

EXHIBIT 9

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Aptus Court Reporting
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Invoice No.	Invoice Date	Job No.
1075849	10/30/2020	10073454
Job Date	Case No.	
10/13/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston TX 77046

Jack Jaser

100.00

TOTAL DUE >>>

\$100.00

Thank you, your business is greatly appreciated.

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TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:
APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits: 0.00

(+) Finance Charges/Debits: 0.00

(=) New Balance: **100.00**

Tax ID: 27-4460942

Phone: (713) 352-3433 Fax:

Please detach bottom portion and return with payment.

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston TX 77046

Job No. : 10073454 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection
Service, et al.
Invoice No. : 1075849 Invoice Date : 10/30/2020
Total Due : \$100.00

Remit To: **Aptus Court Reporting**
Corporate Office
600 West Broadway, Suite 300
San Diego CA 92101

PAYMENT WITH CREDIT CARD



Cardholder's Name:	
Card Number:	
Exp. Date:	Phone#:
Billing Address:	
Zip:	Card Security Code:
Amount to Charge:	
Cardholder's Signature:	
Email:	

EXHIBIT 9

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
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San Diego, CA 92101
Phone: 866-999-8310 Fax: 619-546-9152

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1075832	10/30/2020	10073297
Job Date	Case No.	
10/6/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Sam Capitano

Technology Package (Electronic Files)

Condensed Transcript

Video Stream

Production/Processing

Shipping/Handling

43.00	Pages	@	3.60	154.80
1.00		@	55.00	55.00
1.00		@	30.00	30.00
2.00		@	100.00	200.00
1.00		@	50.00	50.00
1.00		@	45.00	45.00

TOTAL DUE >>>**\$534.80**

Location of Job : Remote deposition

Thank you, your business is greatly appreciated.

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TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:

APTUS COURT REPORTING HOMESTREET BANK

CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits: 0.00**(+) Finance Charges/Debits:** 0.00**(=) New Balance:** **\$534.80****Tax ID:** 27-4460942*Please detach bottom portion and return with payment.*

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10073297 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1075832 Invoice Date : 10/30/2020
Total Due : \$534.80

Remit To: **Aptus Court Reporting**
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101

EXHIBIT 9**PAYMENT WITH CREDIT CARD**

Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101
Phone: 866-999-8310 Fax: 619-546-9152

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1075838	10/30/2020	10073298
Job Date	Case No.	
10/6/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Kurt Pace, Vol. I

Technology Package (Electronic Files)

Condensed Transcript

Production/Processing

Shipping/Handling

86.00	Pages	@	3.60	309.60
1.00		@	55.00	55.00
1.00		@	30.00	30.00
1.00		@	50.00	50.00
1.00		@	45.00	45.00

TOTAL DUE >>> \$489.60

Location of Job : Remote deposition

Thank you, your business is greatly appreciated.

Aptus Court Reporting - CA, LLC. Customer is ultimately responsible for payment within our terms.

TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:
APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits:	0.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$489.60

Tax ID: 27-4460942

Please detach bottom portion and return with payment.

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10073298 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1075838 Invoice Date : 10/30/2020
Total Due : \$489.60

Remit To: **Aptus Court Reporting**
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

EXHIBIT 9

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101
Phone: 866-999-8310 Fax: 619-546-9152

Susan Cavanaugh
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1076831	10/30/2020	10073454
Job Date	Case No.	
10/13/2020	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Jack Jaser

Technology Package (Electronic Files)

Condensed Transcript

Email Transmission

67.00	Pages	@	3.65	244.55
1.00		@	55.00	55.00
1.00		@	30.00	30.00
1.00		@	10.00	10.00

TOTAL DUE >>> \$339.55

Location of Job : Remote deposition

****Electronic Transcript Requested****

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TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:
APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits:	0.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$339.55

Tax ID: 27-4460942

Please detach bottom portion and return with payment.

Susan Cavanaugh
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10073454 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection Service, et al.
Invoice No. : 1076831 Invoice Date : 10/30/2020
Total Due : \$339.55

Remit To: **Aptus Court Reporting**
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

EXHIBIT 9

INVOICE

1 of 1

Aptus Court Reporting
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101
Phone: 866-999-8310 Fax: 619-546-9152

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Invoice No.	Invoice Date	Job No.
1081493	2/26/2021	10078418
Job Date	Case No.	
2/26/2021	5:19-CV-02124-JGB-SP	
Case Name		
Reginald Moore, et al. v. Universal Protection Service, et al.		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:
Alyssa Davis

530.00
TOTAL DUE >>> \$530.00

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TO REMIT PAYMENT VIA ACH OR WIRE TRANSFER:
APTUS COURT REPORTING HOMESTREET BANK
CHECKING ACCT# 0030013364 | ROUTING NO. 325084426

(-) Payments/Credits: 0.00
(+) Finance Charges/Debits: 0.00
(=) New Balance: \$530.00

Tax ID: 27-4460942

Please detach bottom portion and return with payment.

Melinda Arbuckle
Shellist Lazarz Slobin
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Job No. : 10078418 BU ID : AptusSAC
Case No. : 5:19-CV-02124-JGB-SP
Case Name : Reginald Moore, et al. v. Universal Protection
Service, et al.
Invoice No. : 1081493 Invoice Date : 2/26/2021
Total Due : \$530.00

Remit To: **Aptus Court Reporting**
Corporate Office
600 West Broadway, Suite 300
San Diego, CA 92101

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

EXHIBIT 9



6383 Arizona Circle
Los Angeles, CA 90045

Phone: (888) 882-6878
Fax: (888) 883-2946

CourtCall.com

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06/19/2020 12:24 PM

Refund Receipt

All amounts below are in **U.S. Dollars**

COURTCALL ID: 10632221

CASE NUMBER/NAME: 34-2019-00270901 / Maged Hakeem vs. Universal Protection Service, LP

CUSTOMER REF. NUMBER: 14648

DATE OF HEARING: Friday, June 19th, 2020 at 9:30 AM PT

FIRM NAME: Shellist Lazarz Slobin LLP

ATTORNEY/PARTY APPEARING: Ricardo J. Prieto

TELEPHONE: (713) 621-2277

FAX/EMAIL: (713) 621-0993

BASIC FEE/LATE FEE: \$94.00

AMOUNT PAID : \$94.00

AMOUNT REFUNDED : \$94.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00	Visa ending in 3070	6/12/2020 11:22:43AM
Credit	Refund	\$94.00	Visa ending in 3070	6/19/2020 12:23:44PM

This is to inform you that a refund related to the above-referenced appearance has been processed as indicated above.

If this refund has been paid by **Credit Card**, your credit card statement will reflect a refund dated for the next business day. How soon this transaction will appear on your statement will vary from bank to bank and card to card, so please allow up to five (5) business days for the amount to be credited to your account.

If this refund has been paid to your CourtCall **Debit Account**, your debit ledger will show this transaction now.

If this refund has been paid by **Check** (including *courtesy refunds by check* for debit or credit card transactions) you should receive our check within ten (10) business days.

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06/19/2020 12:24 PM

Refund Receipt

All amounts below are in **U.S. Dollars**

COURTCALL ID: 10632221

CASE NUMBER/NAME: 34-2019-00270901 / Maged Hakeem vs. Universal Protection Service, LP

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DATE OF HEARING: Friday, June 19th, 2020 at 9:30 AM PT

FIRM NAME: Shellist Lazarz Slobin LLP

ATTORNEY/PARTY APPEARING: Ricardo J. Prieto

TELEPHONE: (713) 621-2277

FAX/EMAIL: (713) 621-0993

BASIC FEE/LATE FEE: \$94.00

AMOUNT PAID : \$94.00

AMOUNT REFUNDED : \$94.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00	Visa ending in 3070	6/12/2020 11:22:43AM
Credit	Refund	\$94.00	Visa ending in 3070	6/19/2020 12:23:44PM

This is to inform you that a refund related to the above-referenced appearance has been processed as indicated above.

If this refund has been paid by **Credit Card**, your credit card statement will reflect a refund dated for the next business day. How soon this transaction will appear on your statement will vary from bank to bank and card to card, so please allow up to five (5) business days for the amount to be credited to your account.

If this refund has been paid to your CourtCall **Debit Account**, your debit ledger will show this transaction now.

If this refund has been paid by **Check** (including *courtesy refunds by check* for debit or credit card transactions) you should receive our check within ten (10) business days.

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INVOICE / RECEIPT

07/20/2020 07:35 PM

All amounts below are in **U.S. Dollars**

COURTCALL ID: 10714973
CASE NUMBER/NAME: 34-2019-00270901 / Maged Hakeem vs. Universal Protection Service, LP

CUSTOMER REF. NUMBER: 14648
PROCEEDING: Motion
DATE OF HEARING: Tuesday, July 14th, 2020 at 1:30 PM PT
FIRM NAME: Shellist Lazarz Slobin LLP
ATTORNEY/PARTY APPEARING: Ricardo J. Prieto
TELEPHONE: (713) 621-2277
FAX/EMAIL: (713) 621-0993
BASIC FEE/LATE FEE: \$94.00
AMOUNT PAID: \$94.00
PAYMENT NOW DUE: \$0.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00	Visa ending in 3070	7/20/2020 7:35:02PM

If the 'Payment Now Due' indicated above is zero, no payment is due and this receipt is for your records only; otherwise, the amount indicated is now due.

If there is an amount due, please remit your payment upon receipt of this notice. If you have already sent payment please contact our Accounting Department as our records do not reflect receipt of payment at the time this notice was sent. IF PAYMENT IS NOT RECEIVED, FUTURE SERVICE MAY BE DENIED AND/OR THE COURT MAY BE ADVISED OF YOUR REFUSAL TO PAY.

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COURTCALL ID: 10714973
CASE NAME/NUMBER: 34-2019-00270901 / Maged Hakeem vs. Universal Protection Service, LP
CUSTOMER REF. NUMBER: 14648
PROCEEDING: Motion
DATE OF HEARING: Tuesday, July 14th, 2020 at 1:30 PM PT
FIRM NAME: Shellist Lazarz Slobin LLP
ATTORNEY/PARTY APPEARING: Ricardo J. Prieto
TELEPHONE: (713) 621-2277



Phone: (888) 882-6878

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INVOICE / RECEIPT

07/20/2020 07:35 PM

All amounts below are in **U.S. Dollars**

COURTCALL ID: 10714996

CASE NUMBER/NAME: 34-2019-00270901 / Maged Hakeem vs. Universal Protection Service, LP

CUSTOMER REF. NUMBER: 14648

PROCEEDING: Motion

DATE OF HEARING: Tuesday, July 14th, 2020 at 1:30 PM PT

FIRM NAME: Shellist Lazarz Slobin LLP

ATTORNEY/PARTY APPEARING: Melinda Arbuckle

TELEPHONE: (713) 621-2277

FAX/EMAIL: (713) 621-0993

BASIC FEE/LATE FEE: \$94.00

AMOUNT PAID: \$94.00

PAYMENT NOW DUE: \$0.00

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	\$94.00	Visa ending in 3070	7/20/2020 7:35:03PM

If the 'Payment Now Due' indicated above is zero, no payment is due and this receipt is for your records only; otherwise, the amount indicated is now due.

If there is an amount due, please remit your payment upon receipt of this notice. If you have already sent payment please contact our Accounting Department as our records do not reflect receipt of payment at the time this notice was sent. IF PAYMENT IS NOT RECEIVED, FUTURE SERVICE MAY BE DENIED AND/OR THE COURT MAY BE ADVISED OF YOUR REFUSAL TO PAY.

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COURTCALL ID: 10714996

CASE NAME/NUMBER: 34-2019-00270901 / Maged Hakeem vs. Universal Protection Service, LP

CUSTOMER REF. NUMBER: 14648

PROCEEDING: Motion

DATE OF HEARING: Tuesday, July 14th, 2020 at 1:30 PM PT

FIRM NAME: Shellist Lazarz Slobin LLP

ATTORNEY/PARTY APPEARING: Melinda Arbuckle

TELEPHONE: (713) 621-2277

EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

**Fwd: RJP-Moore_Hakeem - 14648 - CourtCall Appearance ID 10752295
CONFIRMED**

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Wed, Jul 29, 2020 at 4:49 PM

This was cancelled. You should see a refund at some point.

Susan Cavanaugh
Legal Assistant
Shellist | Lazarz | Slobin LLP
11 Greenway Plaza | Suite 1515 | Houston, Texas 77046
Tel: 713.621.2277 | Fax: 713.621.0993
scavanaugh@eeoc.net | www.eeoc.net



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----- Forwarded message -----

From: **Cavanaugh, Susan** <scavanaugh@eeoc.net>
Date: Mon, Jul 27, 2020 at 11:04 AM
Subject: RJP-Moore_Hakeem - 14648 - CourtCall Appearance ID 10752295 CONFIRMED
To: Danielle Hopkins <dhopkins@eeoc.net>

I didn't receive a receipt for this.

CourtCall ID: **10752295**

Jul 30 1:30 PM PT
Brown, Judge David I.
Sacramento County Superior Court (Dept. 53)
Proceeding: Motion

Maged Hakeem vs. Universal Protection Service, LP
Case No. 34-2019-00270901
Ref. No. 14648

CONFIRMED \$94.00 USD

----- Forwarded message -----

From: **CourtCall** <response@courtcall.com>
Date: Mon, Jul 27, 2020 at 10:50 AM
Subject: CourtCall Appearance ID 10752295 CONFIRMED
To: <scavanaugh@eeoc.net>

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore_Hakeem - 14648 - CourtCall Appearance ID 10752295 CONFIRMED

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Mon, Jul 27, 2020 at 11:04 AM

I didn't receive a receipt for this.

CourtCall ID: 10752295

Jul 30 1:30 PM PT	Brown, Judge David I. Sacramento County Superior Court (Dept. 53) Proceeding: Motion	Maged Hakeem vs. Universal Protection Service, LP Case No. 34-2019-00270901 Ref. No. 14648	CONFIRMED \$94.00 USD	
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----- Forwarded message -----

From: **CourtCall** <response@courtcall.com>
Date: Mon, Jul 27, 2020 at 10:50 AM
Subject: CourtCall Appearance ID 10752295 CONFIRMED
To: <scavanaugh@eeoc.net>

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<https://app.courtcall.com/clkgo.aspx?id=26642&x=2>

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www.courtcall.com

RECEIPT

COURT OF APPEAL, THIRD APPELLATE DISTRICT
914 CAPITOL MALL
SACRAMENTO, CA 95814

Date: Tuesday, February 16, 2021
Receipt#: R324737
Payment
Total: \$775.00
Paid By:

Shellist Lazarz Slobin LLP
11 Greenway Plaza, Suite 1515
Houston, TX 77046

Records

Case	Caption	Fee Type	Fee status	Amount	Party
C093428	Hakeem et al. v. Universal Protection Service, LP	Civil Filing Fee	paid	\$775.00	Moore et al., Reginald

Payments

Date	Payment	Amount	Party	Payor/Address
02/16/2021	Check #11044	\$775.00	Moore et al., Reginald	Shellist Lazarz Slobin LLP 11 Greenway Plaza, Suite 1515 Houston TX 77046



Invoice Number	Invoice Date	Account Number	Page
6-933-91519	Feb 20, 2020	1745-5617-2	2 of 2

FedEx Express Shipment Summary By Payor Type**FedEx Express Shipments (Original)**

Payor Type	Shipments	Rated Weight (lbs)	Rated Charges	Special Handling Charges	Ret Chg/Tax Credits/Other	Discounts	Total Charges
Shipper	1	2.0	52.30				52.30
Total FedEx Express	1	2.0	52.30				\$52.30

TOTAL THIS INVOICE**USD****\$52.30****FedEx Express Shipment Detail By Payor Type (Original)**

Ship Date: Feb 14, 2020	Signature: NO REFERENCE INFORMATION	Ref #2:
Payor: Shipper	Ref #3:	

Distance Based Pricing, Zone 6

This shipment was priced using FedEx One Rate

Automation	INET	Sender	Recipient
Tracking ID	777768621261	Susan Cavanaugh	Brandon Azmi
Service Type	FedEx Priority Overnight	Shellist Lazarz Slobin LLP	All Access Process Serving
Package Type	FedEx Envelope	11 Greenway Plaza	1242 University Ave.
Zone	06	HOUSTON TX 77046 US	RIVERSIDE CA 92507 US
Packages	1		
Delivered	Feb 14, 2020 09:08		
Svc Area	A1		
Signed by	R.RICHARDO	Transportation Charge	52.30
FedEx Use	000000000/53428/_	Total Charge	USD 52.30
Shipper Subtotal			USD 52.30
Total FedEx Express			USD 52.30

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Invoice Number	Invoice Date	Account Number	Page
7-054-30269	Jul 02, 2020	1745-5617-2	2 of 3

FedEx Express Shipment Summary By Payor Type

FedEx Express Shipments (Original)

Shipper	Shipments	Base Rate	Fuel Surcharge	Total
2	113.21	25.18		138.39

TOTAL THIS INVOICE

USD

\$138.39

FedEx Express Shipment Detail By Payor Type (Original)

Shipper	Shipments	Base Rate	Fuel Surcharge	Total
---------	-----------	-----------	----------------	-------

Fuel Surcharge - FedEx has applied a fuel surcharge of 3.00% to this shipment.
Distance Based Pricing, Zone 6

Automation INET
Tracking ID 770780249042
Service Type FedEx Standard Overnight
Package Type FedEx Envelope
Zone 06
Packages 1
Rated Weight N/A
Delivered Jun 24, 2020 13:18
Svc Area A1
Signed by R.ALLISON
FedEx Use 000000000/244/...

Sender
Danielle Hopkins
Shellist Lazarz Slobin LLP
11 Greenway Plaza
HOUSTON TX 77046 US

Recipient
Jodey Lawrence
Phoenix Settlement Administrat
1411 N. Batavia Street
ORANGE CA 92867 US

Transportation Charge
Fuel Surcharge
Total Charge

USD

40.77
1.22
\$41.99

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First Legal Depositions

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Los Angeles, CA 90071
Phone: (855)-348-4997



FIRSTLEGAL
DEPOSITIONS

Melinda Arbuckle
Shellist Lazarz Slobin LLP
11 Greenway Plaza
Suite 1515
Houston, TX 77046

Invoice #58471

Date	Terms
08/04/2020	Net 30

PAST DUE

Job #53602 on 07/14/2020 at 1:30 PM PT

Firm Case#: 34-2019-00270901

Case: Maged Hakeem v. Universal Protection
Service, LP.

Location: Sacramento Superior Court
Gordon D. Schaber Sacramento County
Courthouse
Sacramento, CA 95814

Shipped On: 08/03/2020

Shipped Via: No Order

Delivery Type: Normal

Services: Court Reporter; Telephonic

Description	Price	Qty	Amount
Hearing Dept. 53			
Late Cancellation - Per Diem	\$ 550.00	1.00	\$ 550.00
Emergency Add-On	\$ 200.00	1.00	\$ 200.00
			<u>\$ 750.00</u>

Amount Due: \$ 750.00

Paid: \$ 0.00

Balance Due:	\$ 750.00
Payment Due:	09/03/2020

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P.O. Box 841441
Dallas, TX 75284-1441

Tax ID: 46-3364757 First Legal Depositions Phone: 855-348-4997

EXHIBIT 9



First Legal Network
Insurance Services LLC
P.O. Box 749469
Los Angeles CA 90074-9469

TAX ID# 27-1770050

INVOICE

Invoice No.	Customer No.
22922	10008
Invoice Date	Total Due
2/15/20	279.00

Shellist Lazarz Slobin LLP
Attn: Danielle Hopkins
11 Greenwat Plaza Suite 1515
Houston, TX 77046

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			10008	22922	2/15/20	279.00	1		
Date	Order No.	Svc	Service Detail					Charges	Total
2/03/20	326420	APS	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 19cv2124 Reginald Moore, Eduardo Guerra v Universal Protect SUMMONS & 1ST AMENDED COMPLT..... PLS SERVE IMMEDIATEL Y, PLS GENERATE POS IMMEDIATELY! Signed: Daisy Montenegro intak					Universal Protection Service, LP d/ Base Chg : 250.00 818 W. 7th st LOS ANGELES CA 90017 Page Count: 29.00	279.00
PROCESS-SAME DAY									
								Total	279.00

INVOICE PAYMENT DUE UPON RECEIPT



**First Legal Network
Insurance Services LLC**
P.O. Box 841441
Dallas, TX 75284-1441

TAX ID# 27-1770050

INVOICE

Invoice No.	Customer No.
24253	10008
Invoice Date	Total Due
4/30/20	139.10

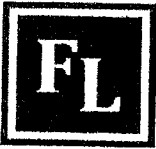
Shellist Lazarz Slobin LLP
Attn: Danielle Hopkins
11 Greenwat Plaza Suite 1515
Houston, TX 77046

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			10008	24253	4/30/20	139.10	1		
Date	Ord No.	Svc	Service Detail				Charges	Total	
4/23/20	328695	STP	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 HAKERM V UNIVERSAL PROTECTION SERVICE MTN TO INTERVENE, PROP ORD, MEMO(exhs 1-4) & POS & Letter FIRST CLASS MAIL Signed: mailed <						

INVOICE PAYMENT DUE UPON RECEIPT

EXHIBIT 9



**First Legal Network
Insurance Services LLC**
P.O. Box 841441
Dallas, TX 75284-1441

TAX ID# 27-1770050

INVOICE

Invoice No.	Customer No.
24254	10008
Invoice Date	Total Due
4/30/20	139.10

Shellist Lazarz Slobin LLP
Attn: Danielle Hopkins
11 Greenwat Plaza Suite 1515
Houston, TX 77046

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			10008	24254	4/30/20	139.10	1		
Date	Order No.	Svc	Service Detail					Charges	Total
4/23/20	328697	STP	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 HAKEEM V UNIVERSAL PROTECTION SERVICE MTN TO INTERVENE, PROP ORD, MEMO(exhs 1 - 4), POS & letter 1ST CLASS MAIL SCOTT EDWARD COLE, LAURA GRACE VAN NOTE Signed: mailed <						

INVOICE PAYMENT DUE UPON RECEIPT

EXHIBIT 9



**First Legal Network
Insurance Services LLC**
P.O. Box 841441
Dallas, TX 75284-1441

TAX ID# 27-1770050

Shellist Lazarz Slobin LLP
Attn: Danielle Hopkins
11 Greenway Plaza Suite 1515
Houston, TX 77046

INVOICE

Invoice No.	Customer No.
24255	10008
Invoice Date	Total Due
4/30/20	138.00

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877)350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			10008	24255	4/30/20	138.00	1		
Date	Ord No.	Svc	Service Detail				Charges	Total	
4/23/20	320698	STP	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 HAKEEM V UNIVERSAL PROTECTION SERVICE MTN TO INTERVENE, PROP ORD, EMO(exhs 1-4), POS & Letter 1ST CLASS MAIL Signed: Mailed <						

INVOICE PAYMENT DUE UPON RECEIPT

EXHIBIT 9

TAX ID# 27-1770050

Invoice No.	Customer No.
24596	10008
Invoice Date	Total Due
5/15/20	270.50

Date	Order No.	Svc	Customer No.	Invoice No.	Period Ending	Amount Due	Pg
4/23/20	328691	SDF	10008	24596	5/15/20	270.50	1
COURT FILING-SAMEDAY			Service Detail				
			Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 HAKEEM V UNIVERSAL PROTECTION SERVICE MTN TO INTERVENE, PROP ORD, MEMO(exhibits 1 - 4) & POS PLS PRINT & SUBMIT FOR FILING PDF Signed: Drop Box				
			SCSC-SACRAMENTO 720 9TH STREET SACRAMENTO CA 95814				
			Base Chg : 175.00 Page Count: 95.50				
			Total 270.50				

EXHIBIT 9



Insurance Services LLC

P.O. Box 841441

Dallas, TX 75284-1441

TAX ID# 27-1770050

Invoice No.	Customer No.
26277	10008
Invoice Date	Total Due
7/15/20	259.00

Shellist Lazarz Slobin LLP
 Attn: Danielle Hopkins
 11 Greenwat Plaza Suite 1515
 Houston, TX 77046

BILLING/PAYMENT QUESTIONS
 CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg			
			10008	26277	7/15/20	259.00	1			
Date	Ordr No.	Svc	Service Detail					Charges	Total	
7/02/20	331301	SDF	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 MAGED HAKEEM, SHERIF HAKEEM v UNIVERSAL PROTECTION PLAINTIFF-INTERVENORSF RENEWED OBJECTIONS TO PROPOSED CL pls print & file pdf cc Signed: DROP BOX					SCSC-SACRAMENTO 720 9TH STREET SACRAMENTO CA 95814 Base Chg : 175.00 Page Count: 84.00	259.00	
COURT FILING-SAMEDAY										
									Total	259.00

INVOICE PAYMENT DUE UPON RECEIPT

EXHIBIT 9



Insurance Services LLC

P.O. Box 841441
Dallas, TX 75284-1441

TAX ID# 27-1770050

Invoice No.	Customer No.
26278	10008
Invoice Date	Total Due
7/15/20	175.00

Shellist Lazarz Slobin LLP
Attn: Danielle Hopkins
11 Greenwat Plaza Suite 1515
Houston, TX 77046

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			10008	26278	7/15/20	175.00	1		
Date	Ord#	Svc	Service Detail				Charges	Total	
7/07/20	331407	SDF	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 MAGED HAKEEM, SHERIF HAKEEM v UNIVERSAL PROTECTION NTC OF EXPARTE APPLI, MEMO ISO & PROP ORDER PLS FILE WITH D-53 ADV FEE OF \$60. PLS COMPLETE BY 2PM!!! Signed: DROP BOX				SCSC-SACRAMENTO 813 6th St SACRAMENTO CA 95814	Base Chg : 175.00	175.00
COURT FILING-SAMEDAY									



First Legal Network
Insurance Services LLC
 P.O. Box 841441
 Dallas, TX 75284-1441

TAX ID# 27-1770050

INVOICE

Invoice No.	Customer No.
27182	10008
Invoice Date	Total Due
8/15/20	66.00

Shellist Lazarz Slobin LLP
 Attn: Danielle Hopkins
 11 Greenwat Plaza Suite 1515
 Houston, TX 77046

BILLING/PAYMENT QUESTIONS
 CLIENT CARE (877) 350-8698

		Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
		10008	27182	8/15/20	66.00	1		
Date	Ord. No.	Svc	Service Detail			Charges	Total	
7/07/20	332591	BIL	Shellist Lazarz Slobin LLP 11 Greenway Plaza Houston TX 77046 Caller: Susan Cavanaugh 34-2019-00270901 MAGED HAKEEM, SHERIF HAKEEM v UNIVERSAL PROTECTION NTC OF EXPARTE APPLI, MEMO ISO & PROP ORDER PLS FILE WITH D-53 ADV FEE OF \$60. PLS COMPLETE BY 2PM!!! Signed: ADD BILL			Adv Fees : 60.00 Check Chg : 6.00	66.00	
ADDITIONAL	BILLING		SCSC-SACRAMENTO 813 6th St SACRAMENTO CA 95814 Comment: * NO BASE CHARGE *					
			Ref: 14648					
			Invoice Amount: 6.00 Fees Advanced: 60.00 Total Amount Due: 66.00					
						Total	66.00	

INVOICE PAYMENT DUE UPON RECEIPT


**First Legal Network
Insurance Services LLC**

P.O. Box 841441
Dallas, TX 75284-1441

TAX ID# 27-1770050

#35602

INVOICE

Invoice No.	Customer No.
37634	10008
Invoice Date	Total Due
12/31/21	113.50

Shellist Lazarz Slobin LLP
Attn: Danielle Hopkins
11 Greenwat Plaza Suite 1515
Houston, TX 77046

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877) 350-8698

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			10008	37634	12/31/21	113.50	1		
Date	Ord# No.	Svc	Service Detail				Charges	Total	
12/16/21	348809	PDF	Shellist Lazarz Slobin LLP 11 Greenway Plaza HOUSTON TX 77002 Caller: Susan Cavanaugh 5:19-cv-02124-JGB-SP Reginald Moore v Universal Protection Service PLAINTIFFS NOTICE OF MOTION, STIPULATION & letter courtesy copies to judge Bernal! Signed: delivered				USDC-RIVERSIDE 3470 12TH STREET RIVERSIDE CA 92501	Base Chg : 100.00 Page Count: 13.50	113.50
PDF COURTESY DELIVERY									
								Total	113.50

INVOICE PAYMENT DUE UPON RECEIPT**EXHIBIT 9**

LAW OFFICE OF THOMAS J. CRANE

INVOICE

210-736-1110
900 N.E. Loop 410, Suite
D306
San Antonio, Texas
78209

Ricardo Prieto
Shellist Lazarz Slobin LLP
11 Greenway Plaza, Suite 1515
Houston, Texas 77045

Jeremy T. Naftel
Martenson Hasbrouck & Simon LLP
2573 Apple Valley Road NE
Atlanta, Georgia 30319

Date: 10/28/21

Re: Moore, Et Al v. Universal Protection Service

Invoice Number: 67890

Description	Hours	Per Hour	Amount
Arbitration services initial deposit	N/A	N/A	\$5,000.00
		Subtotal	5,000.00
		Total	5,000.00

Thank you for your business.

*split between
parties*

R-7P-14648 - Moore
#35604

Filing Fee

A filing fee of \$75 is required to file a new PAGA claim notice. Filing fees should be paid by check, made out to LWDA, and sent by regular mail to:

Department of Industrial Relations
Accounting Unit
455 Golden Gate Ave, 10th Floor
San Francisco, CA 94102

The check should be accompanied by a cover letter with sufficient information to identify the notice, including the LWDA case number assigned upon submission of this form.

Parties requesting in forma pauperis status should complete a Confidential Request to Waive Court Fees (Judicial Council Court Form FW-001) or similar form and submit it online with the notice below.

IFP

- ☐ I wish to claim In Forma Pauperis and am attaching a Confidential Request to Waive Court Fees (Judicial Council Court Form FW-001) or similar form to this submission.
- ☐ I declare that I have or will pay the filing fees required by statute [Labor Code section 2699.3(a)(1)(B)] according to the instructions on the PAGA home page, unless I have claimed in forma pauperis by checking the box below.

Lynn Cohn
Northwestern Pritzker School of Law
 375 East Chicago Avenue, Room RB 861
 Chicago, Illinois 60611
 Phone: (312) 503-2598
 Taxpayer ID: 344-62-6989

INVOICE

INVOICE #1102
 DATE: 3/31/2021

Todd Slobin
 Shellist Lazarz Slobin LLP
 11 Greenway Plaza, Suite 1515
 Houston, TX 77046

FOR: MEDIATION SERVICES

RE: Reginald Moore, Eduardo Guerra and Alisa Jones, on behalf of themselves and all others similarly situated v. Universal Protection Services, LP, d/b/a Allied Universal Security Services – November 2, 2020

Jeremy t.I Naftel
 Martenson, Hasbrouck & Simon LLP
 455 Capital Mall, Suite 601
 Sacramento, CA 95814

DATE	ACTIVITY	TIME	TOTAL AMOUNT
	PROFESSIONAL SERVICES - \$700/Hr.		
9/25/2020	Calls w/counsel	1.0 Hr.	700.00
10/22/2020	Call w/counsel	0.25 Hr.	175.00
10/27/2020	Call w/counsel	0.50 Hr.	350.00
10/30/2020	Call w/counsel	0.50 Hr.	350.00
10/31/2020	Prepare for mediation	6.0 Hrs.	4,200.00
11/1/2020	Prepare for mediation	1.0 Hr.	700.00
11/2/2020	Participate in mediation	11.5 Hrs.	8,050.00
11/3/2020-3/18/2021	Follow-up	3.0 Hrs.	2,100.00
	Multiple plaintiff fee		1,500.00
	505 – Plaintiff = \$9,062.50		
	50% - Defendant = \$9,062.50		
	Due to the "Stay At Home" order, please remit payment direct to:		
	Lynn Cohn 1209 North Astor, 14 South Chicago, IL 60610		
	Payment Due Upon Receipt of Invoice		
	Make Check Payable To: Lynn Cohn		
	Enclose Copy of Invoice With Remittance		
	Total:		18,125.00
		BALANCE DUE	\$18,125.00



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Tuesday May 19, 2020

INVOICE

SHELLIST.383876

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE PROOF; NOTICE OF RULING

Date	Description	Amount
------	-------------	--------

05/19/20 Miscellaneous Job: Court Service

05/19/20 COURT DISPATCH 50.00

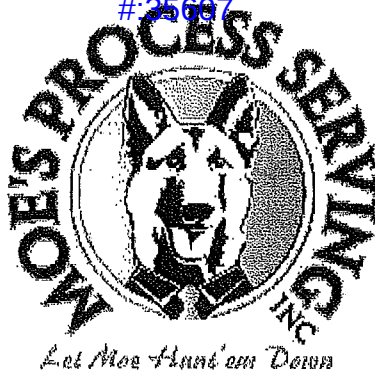
We appreciate the business and your loyalty!!! 50.00

We are filing at every open court!!!

2300 P STREET SACRAMENTO, CA 95816
Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9

25697



Attention: SUSAN
 SHELLIST LAZARZ SLOBIN LLP
 11 GREENWAY PLAZA
 SUITE 1515
 HOUSTON TX 77046

Friday May 29, 2020

INVOICE

SHELLIST.384413

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE 5 DOCS

Date	Description	Amount
05/29/20	Miscellaneous Job: Court Service	
05/29/20	COURT DISPATCH	50.00
05/29/20	COPIES AT \$.15 PER PAGE	63.00
05/29/20	FEE ADVANCE	870.00
05/29/20	CHECK CHARGE	87.00
We appreciate the business and your loyalty!!!		1,070.00
We are filing at every open court!!!		-\$67.00
Total		\$1,003.00

2300 P STREET SACRAMENTO, CA 95816
 Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Friday May 29, 2020

INVOICE

SHELLIST.384466

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE AMENDED NOTICE OF MOTION; PROPOSED ORDER; PROOF

Date	Description	Amount
05/29/20	Miscellaneous Job: Court Service	
05/29/20	COURT DISPATCH	50.00
	We appreciate the business and your loyalty!!!	50.00
	We are filing at every open court!!!	

2300 P STREET SACRAMENTO, CA 95816
Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Friday June 12, 2020	INVOICE	SHELLIST.385355
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Case #: 34-2019-00270901
Court: SACRAMENTO COUNTY SUPERIOR COURT
Title: MAGED HAKEEM vs. REGINALD MOORE
Description: COURT SERVICE;; FILE CONSOLIDATED REPLY; EXHIBITS 1-6 (7 TOTAL DOCS TO FILE)

Date	Description	Amount
06/12/20	Miscellaneous Job: Court Service	
06/12/20	COURT DISPATCH	50.00
06/12/20	COPIES AT \$.15 PER PAGE	69.30
	We appreciate the business and your loyalty!!!	119.30
	We are filing at every open court!!!	

#35610



Attention: SUSAN
 SHELLIST LAZARZ SLOBIN LLP
 11 GREENWAY PLAZA
 SUITE 1515
 HOUSTON TX 77046

Friday June 12, 2020

INVOICE

SHELLIST.385156

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE NOTICE OF MOTION; VERIFIED APPLICATION; EXHIBIT A

Date	Description	Amount
06/12/20	Miscellaneous Job: Court Service	
06/12/20	COURT DISPATCH	50.00
We appreciate the business and your loyalty!!!		50.00
We are filing at every open court!!!		

2300 P STREET SACRAMENTO, CA 95816
 Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9

#35011



Attention: SUSAN
 SHELLIST LAZARZ SLOBIN LLP
 11 GREENWAY PLAZA
 SUITE 1515
 HOUSTON TX 77046

Friday June 19, 2020

INVOICE

SHELLIST.385371

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE PROOF OF SERVICE

Date	Description	Amount
06/19/20	Miscellaneous Job: Court Service	
06/19/20	COURT DISPATCH	50.00
We appreciate the business and your loyalty!!!		50.00
We are filing at every open court!!!		

2300 P STREET SACRAMENTO, CA 95816
 Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Thursday July 02, 2020	INVOICE	SHELLIST.386184
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Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE PROOF OF SERVICE; PROPOSED ORDER

Date	Description	Amount
------	-------------	--------

07/02/20 Miscellaneous Job: Court Service

07/02/20 COURT DISPATCH 50.00

We appreciate the business and your loyalty!!! 50.00

We are filing at every open court!!!



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Thursday July 02, 2020

INVOICE

SHELLIST.386225

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE PROOF OF SERVICE; PROPOSED ORDER; PROPOSED ORDER
WITH EXHIBIT A

Date	Description	Amount
07/02/20	Miscellaneous Job: Court Service	
07/02/20	COURT DISPATCH	50.00
	We appreciate the business and your loyalty!!!	50.00
	We are filing at every open court!!!	



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Tuesday July 07, 2020

INVOICE

SHELLIST.386449

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: ~~MAGED-HAKEEM~~ vs. REGINALD-MOORE

Description: COURT SERVICE;; FILE PROOF OF SERVICE AND INTERVENOR

Date	Description	Amount
07/07/20	Miscellaneous Job: Court Service	
07/07/20	COURT DISPATCH	50.00
08/17/20	Payment, Check Number: 10912, Thank You!	-50.00
	We appreciate the business and your loyalty!!!	0.00

35 YEARS STRONG!

2300 P STREET SACRAMENTO, CA 95816

Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Tuesday July 07, 2020

INVOICE

SHELLIST.386485

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: ~~MAGED HAKEEM vs. REGINALD MOORE~~

Description: COURT SERVICE;; FILE PROOF OF SERVICE

Date	Description	Amount
07/07/20	Miscellaneous Job: Court Service	
07/07/20	COURT DISPATCH	50.00
08/17/20	Payment, Check Number: 10912, Thank You!	-50.00
We appreciate the business and your loyalty!!!		0.00
35 YEARS STRONG!		

#35616



Attention: SUSAN
 SHELLIST LAZARZ SLOBIN LLP
 11 GREENWAY PLAZA
 SUITE 1515
 HOUSTON TX 77046

Monday August 03, 2020

INVOICE

SHELLIST.387926

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED-HAKEEM-vs-REGINALD-MOORE

Description: COURT SERVICE;; FILE NOTICE OF MOTION; APPLICATION TO APPEAR; EXHIBIT A;
 PROPOSED ORDER; PROOF

Date	Description	Amount
08/03/20	Miscellaneous Job: Court Service	
08/03/20	COURT DISPATCH	50.00
08/17/20	Payment, Check Number: 10912, Thank You!	-50.00
	We appreciate the business and your loyalty!!!	0.00
	35 YEARS STRONG!	

2300 P STREET SACRAMENTO, CA 95816
 Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
 SHELLIST LAZARZ SLOBIN LLP
 11 GREENWAY PLAZA
 SUITE 1515
 HOUSTON TX 77046

Thursday August 06, 2020

INVOICE

SHELLIST.388185

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE AMENDED MOTION; AMENDED MOTION; AMENDED APPLICATION
 TO APPEAR PRO HAC VICE; PROPOSED ORDER; PROOF

Date	Description	Amount
08/06/20	Miscellaneous Job: Court Service	
08/06/20	COURT DISPATCH	50.00
	We appreciate the business and your loyalty!!!	50.00
	We are filing at every open court!!!	

2300 P STREET SACRAMENTO, CA 95816
 Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Friday August 14, 2020

INVOICE

SHELLIST.388601

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE REQUEST FOR JUDICIAL NOTICE (2); RESPONSE; PROPOSED
ORDER; PROOF OF SERVICE

Date	Description	Amount
08/14/20	Miscellaneous Job: Court Service	
08/14/20	COURT DISPATCH	50.00
08/14/20	COPIES AT \$.15 PER PAGE	14.00
	We appreciate the business and your loyalty!!!	64.00
	We are filing at every open court!!!	



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Monday February 01, 2021

INVOICE

SHELLIST.396718

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE NOTICE OF APPEAL

Date	Description	Amount
02/01/21	Miscellaneous Job: Court Service	
02/01/21	COURT DISPATCH	50.00
	We appreciate the business and your loyalty!!!	50.00
	We are filing at every open court!!!	

2300 P STREET SACRAMENTO, CA 95816
Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Attention: SUSAN
SHELLIST LAZARZ SLOBIN LLP
11 GREENWAY PLAZA
SUITE 1515
HOUSTON TX 77046

Monday March 01, 2021

INVOICE

SHELLIST.398231

Case #: 34-2019-00270901

Court: SACRAMENTO COUNTY SUPERIOR COURT

Title: MAGED HAKEEM vs. REGINALD MOORE

Description: COURT SERVICE;; FILE APPELLANT'S NOTICE DESIGNATING RECORD ON APPEAL

Date	Description	Amount
03/01/21	Miscellaneous Job: Court Service	
03/01/21	COURT DISPATCH	50.00
	We appreciate the business and your loyalty!!!	50.00
	We are filing at every open court!!!	

2300 P STREET SACRAMENTO, CA 95816
Telephone: 916 498-0808 , FAX: 916-498-0817 Tax ID: 26-1674252

EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

Fwd: Activity in Case 2:19-cv-09506 Moore et al v. Universal Protection Service, LP Complaint (Attorney Civil Case Opening)

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Fri, Jun 10, 2022 at 10:20 AM

----- Forwarded message -----

From: <cacd_ecfmail@cacd.uscourts.gov>

Date: Tue, Nov 5, 2019 at 5:05 PM

Subject: Activity in Case 2:19-cv-09506 Moore et al v. Universal Protection Service, LP Complaint (Attorney Civil Case Opening)

To: <ecfnef@cacd.uscourts.gov>

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered by Arbuckle, Melinda on 11/5/2019 at 3:05 PM PST and filed on 11/5/2019

Case Name: Moore et al v. Universal Protection Service, LP

Case Number: 2:19-cv-09506

Filer: Reginald Moore
Alisa Jones
Eduardo Guerra

Document Number: 1

Docket Text:

COMPLAINT Receipt No: 0973-24730604 - Fee: \$400, filed by Plaintiffs Reginald Moore, Alisa Jones, Eduardo Guerra. (Attachments: # (1) Exhibit A - Consent to Join form of Reginald Moore, # (2) Exhibit B - Consent to Join form of Eduardo Guerra, # (3) Exhibit C - Consent to Join form of Alisa Jones) (Attorney Melinda Arbuckle added to party Eduardo Guerra(pty:pla), Attorney Melinda Arbuckle added to party Alisa Jones(pty:pla), Attorney Melinda Arbuckle added to party Reginald Moore(pty:pla))(Arbuckle, Melinda)

2:19-cv-09506 Notice has been electronically mailed to:

Melinda Arbuckle marbuckle@eeoc.net, celliott@eeoc.net, rprieto@eeoc.net, scavanaugh@eeoc.net

2:19-cv-09506 Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\2019_11_05 - Original Complaint FINAL FOR FILING.pdf

EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-14648 (Slobin PHV) Pay.gov Payment Confirmation: CACD CM ECF

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Thu, Nov 7, 2019 at 10:33 AM

----- Forwarded message -----

From: <notification@pay.gov>
Date: Thu, Nov 7, 2019 at 10:19 AM
Subject: Pay.gov Payment Confirmation: CACD CM ECF
To: scavanaugh@eeoc.net <scavanaugh@eeoc.net>

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact CACD CM/ECF Helpdesk at (213) 894-0242.

Application Name: CACD CM ECF
Pay.gov Tracking ID: 26LCBEJ7
Agency Tracking ID: 0973-24742189
Transaction Type: Sale
Transaction Date: Nov 7, 2019 11:19:32 AM

Account Holder Name: Todd Slobin
Transaction Amount: \$400.00
Card Type: Visa
Card Number: *****3070

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-14648 (Prieto PHV) Pay.gov Payment Confirmation: CACD CM ECF

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Thu, Nov 7, 2019 at 10:34 AM

----- Forwarded message -----

From: <notification@pay.gov>
Date: Thu, Nov 7, 2019 at 10:30 AM
Subject: Pay.gov Payment Confirmation: CACD CM ECF
To: scavanaugh@eeoc.net <scavanaugh@eeoc.net>

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact CACD CM/ECF Helpdesk at (213) 894-0242.

Application Name: CACD CM ECF
Pay.gov Tracking ID: 26LCBGV6
Agency Tracking ID: 0973-24742270
Transaction Type: Sale
Transaction Date: Nov 7, 2019 11:30:02 AM

Account Holder Name: Todd Slobin
Transaction Amount: \$400.00
Card Type: Visa
Card Number: *****3070

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-14648-Moore_Hakeem - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>

Wed, Jun 3, 2020 at 5:42 PM

To: Danielle Hopkins <dhopkins@eeoc.net>

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>

Date: Wed, Jun 3, 2020 at 5:38 PM

Subject: Public Case Access System - Order Confirmation

To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 6/3/2020 3:38:10 PM

Description: Document(s) Purchase

Your Order Confirmation Number is: **679303**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Correspondence (Letter requesting 07/14/2020 hearing be reset to 06/08/2020-DENIED) filed.	5/28/2020 2:00:00 PM	4	4.00

Order Total: 4.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-14648 - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
 To: Danielle Hopkins <dhopkins@eeoc.net>

Wed, Jun 10, 2020 at 5:44 PM

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
 Date: Wed, Jun 10, 2020 at 5:40 PM
 Subject: Public Case Access System - Order Confirmation
 To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 6/10/2020 3:40:06 PM

Description: Document(s) Purchase

Your Order Confirmation Number is: **680788**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Motion - Other (to Appear Pro Hac Vice) submitted by Moore, Reginald; Guerra, Eduardo rejected on 06/10/2020 .	6/10/2020 1:35:25 PM	1	1.00

Order Total: 1.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-Hakeem-14648 - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Mon, Jun 22, 2020 at 8:40 AM

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Fri, Jun 19, 2020 at 6:43 PM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 6/19/2020 4:43:01 PM

Description: Document(s) Purchase

Your Order Confirmation Number is: **682790**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Minutes finalized for Motion for Leave to Intervene - PJ Law and Motion heard on 06/19/2020 09:30:00 AM .	6/19/2020 9:30:00 AM	3	3.00

Order Total: 3.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-14648-Moore_Hakeem - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Thu, Jul 2, 2020 at 12:58 PM

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Thu, Jul 2, 2020 at 12:25 PM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 7/2/2020 10:25:40 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **685355**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Order After Hearing filed.	7/1/2020 3:17:00 PM	3	3.00

Order Total: 3.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-14648-Moore-Hakeem - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net> Tue, Jul 7, 2020 at 9:42 AM
To: Danielle Hopkins <dhopkins@eeoc.net>

----- Forwarded message -----
From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Tue, Jul 7, 2020 at 9:25 AM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 7/7/2020 7:25:54 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **686123**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Declaration - Other (Amended Dec of Maged Hakeem ISO plfs Motion for Final Approval of Class Action Settlement and Judgment) filed.	6/19/2020 10:42:00 AM	3	3.00
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Declaration - Other (Amended Dec of Sherif Hakeem ISO plfs Motion for Final Approval of Class Action Settlement and Judgment) filed.	6/19/2020 10:42:00 AM	4	4.00
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Notice of Motion (Amended Notice of Motion and Memo ISO plfs Motion for Final Approval of Class Action Settlement and Judgment) filed.	6/19/2020 10:42:00 AM	29	14.60
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Declaration - Other (Amended Dec of Scott Edward Cole ESQ ISO plfs Motion for Final Approval of Class Action Settlement and Judgment) filed.	6/19/2020 10:42:00 AM	985	40.00
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Declaration - Other (Amended Dec of Christina Samaniego ISO plfs Motion for Final Approval of Class Action Settlement and Judgment) filed.	6/19/2020 10:42:00 AM	6	5.40
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Declaration - Other (Amended Dec of Alan Garrido on Behalf of CPT Group Inc with Respect to Settlement Claims Administration) filed.	6/19/2020 10:42:00 AM	234	40.00
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Declaration - Other (Amended Dec of Barbara Sanchez ISO plfs Motion for Final Approval of Class Action Settlement and Judgment) filed.	6/19/2020 10:42:00 AM	3	3.00

Order Total: 110.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-Hakeem-14648 - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net> Thu, Jul 16, 2020 at 12:49 PM
To: Danielle Hopkins <dhopkins@eeoc.net>

----- Forwarded message -----
From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Thu, Jul 16, 2020 at 12:43 PM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 7/16/2020 10:43:04 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **688220**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Complaint in Intervention filed.	7/2/2020 11:48:00 AM	19	10.60

Order Total: 10.60

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-14648 Moore-Hakeem - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net> Mon, Jul 20, 2020 at 8:48 AM
To: Danielle Hopkins <dhopkins@eeoc.net>

----- Forwarded message -----
From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Fri, Jul 17, 2020 at 5:46 PM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michae Slobin

Order Date: 7/17/2020 3:46:45 PM

Description: Document(s) Purchase

Your Order Confirmation Number is: **688564**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Order After Hearing filed.	7/1/2020 9:53:00 AM	7	5.80

Order Total: 5.80

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-Hakeem 14648 - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
 To: Danielle Hopkins <dhopkins@eeoc.net>

Thu, Jul 16, 2020 at 10:30 AM

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>

Date: Thu, Jul 16, 2020 at 10:25 AM

Subject: Public Case Access System - Order Confirmation

To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 7/16/2020 8:25:54 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **688158**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Minutes finalized for Motion - Other - Civil Law and Motion heard on 07/14/2020 02:00:00 PM .	7/14/2020 2:00:00 PM	2	2.00

Order Total: 2.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-Hakeem-14648 - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Thu, Aug 13, 2020 at 9:30 AM

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Thu, Aug 13, 2020 at 8:07 AM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 8/13/2020 6:03:50 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **694536**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Amended Complaint (First Amended) filed.	1/13/2020 11:53:00 AM	20	11.00
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Complaint filed.	12/9/2019 3:34:58 PM	18	10.20

Order Total: 21.20

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-14648-Moore_Hakeem - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Fri, Aug 14, 2020 at 11:19 AM

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>
Date: Fri, Aug 14, 2020 at 9:54 AM
Subject: Public Case Access System - Order Confirmation
To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 8/14/2020 7:54:19 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **694876**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Minutes finalized for Motion - Other - Civil Law and Motion heard on 07/14/2020 02:00:00 PM .	7/14/2020 2:00:00 PM	2	2.00

Order Total: 2.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore_Hakeem-14648 - Public Case Access System - Order Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>

Thu, Aug 27, 2020 at 10:58 AM

To: Danielle Hopkins <dhopkins@eeoc.net>

----- Forwarded message -----

From: **Sacramento Superior Court - Public Case Access System** <services@saccourt.ca.gov>

Date: Thu, Aug 27, 2020 at 10:41 AM

Subject: Public Case Access System - Order Confirmation

To: <scavanaugh@eeoc.net>

Hello, Michael Slobin

Order Date: 8/27/2020 8:41:46 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **697883**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Minutes finalized for heard on 08/26/2020 09:15:00 AM .	8/26/2020 9:15:00 AM	8	6.20

Order Total: 6.20

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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EXHIBIT 2



Hopkins, Danielle <dhopkins@eeoc.net>

Public Case Access System - Order Confirmation

1 message

Sacramento Superior Court - Public Case Access System <services@saccourt.ca.gov> Wed, Feb 24, 2021 at 12:43 PM
To: dhopkins@eeoc.net

Hello, Todd Slobin

Order Date: 2/24/2021 10:43:10 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **737426**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Notice of Entry of Order filed.	1/4/2021 10:24:00 AM	11	7.40

Order Total: 7.40

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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EXHIBIT 9



Hopkins, Danielle <dhopkins@eeoc.net>

Public Case Access System - Order Confirmation

1 message

Sacramento Superior Court - Public Case Access System <services@saccourt.ca.gov> Wed, Feb 24, 2021 at 1:01 PM
To: dhopkins@eeoc.net

Hello, Todd Slobin

Order Date: 2/24/2021 11:01:48 AM

Description: Document(s) Purchase

Your Order Confirmation Number is: **737436**

Case Number	Case Title	ROA Entry	Filing Date	Page Count	Amount
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Order After Hearing (Order GRANTING Final Approval of Class Action Settlement) filed.	8/26/2020 9:13:00 AM	7	5.80
2019-00270901	Maged Hakeem vs. Universal Protection Service, LP	Minutes finalized for Motion - Other - Civil Law and Motion heard on 08/18/2020 01:30:00 PM .	8/18/2020 1:30:00 PM	8	6.20

Order Total: 12.00

Please keep this number for your reference. If you made this purchase without being logged in, you will need this number, along with your email address, to retrieve the order using the Find an Order feature of our Public Case Access Web site. If you were logged in, you can still use this feature the same way, but you will also have access to all of your orders via the "Your Account" link.

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Hopkins, Danielle <dhopkins@eeoc.net>

Fwd: State Bar of Texas: Payment Confirmation

1 message

Prieto, Rick <rprieto@eeoc.net>

Wed, Nov 6, 2019 at 1:19 PM

To: Danielle Hopkins <dhopkins@eeoc.net>, Susan Cavanaugh <scavanaugh@eeoc.net>

Cc: "Arbuckle, Melinda" <marbuckle@eeoc.net>

This expense is for Reginald Moore vs Allied Security. I used the firm's cc.

Ricardo J. Prieto
Senior Associate

Shellist | Lazarz | Slobin LLP

11 Greenway Plaza, Suite 1515 | Houston, Texas 77046

Tel: 713.621.2277 | Fax: 713.621.0993

rprieto@eeoc.net | www.eeoc.net

***Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization.**



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----- Forwarded message -----

From: <noreply@texasbar.com>

Date: Wed, Nov 6, 2019 at 1:18 PM

Subject: State Bar of Texas: Payment Confirmation

To: <rprieto@eeoc.net>

Thank you for your online payment to The State Bar of Texas!

NOTE: This page represents a confirmation that your payment information has been submitted and received by the State Bar of Texas. If your payment is not reflected on your statement, your fees are not approved for collection and not considered paid. If this occurs, please contact the Membership Department at 1-800-204-2222, ext. 1383 immediately.

This email contains important details about your online payment number 10687811. To help us serve you better, please refer to this number, your Bar Card number (if applicable), and your email address should you contact us with questions about your order.

Payments for the following items were received at 1:17 PM (11/06/2019) today.

Item Description	Price
Supreme Court Certificate	\$25.00
State Bar Certificate	\$25.00
Total:	\$50.00

Thank you for using MyBarPage on Texasbar.com to manage your member account.



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore-14648 - Slobin State Bar of Texas: Payment Confirmation

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>

Wed, Nov 6, 2019 at 2:00 PM

To: Danielle Hopkins <dhopkins@eeoc.net>

----- Forwarded message -----

From: <noreply@texasbar.com>

Date: Wed, Nov 6, 2019 at 1:58 PM

Subject: State Bar of Texas: Payment Confirmation

To: <scavanaugh@eeoc.net>

Thank you for your online payment to The State Bar of Texas!

NOTE: This page represents a confirmation that your payment information has been submitted and received by the State Bar of Texas. If your payment is not reflected on your statement, your fees are not approved for collection and not considered paid. If this occurs, please contact the Membership Department at 1-800-204-2222, ext. 1383 immediately.

This email contains important details about your online payment number 10687817. To help us serve you better, please refer to this number, your Bar Card number (if applicable), and your email address should you contact us with questions about your order.

Payments for the following items were received at 1:58 PM (11/06/2019) today.

Item Description	Price
Supreme Court Certificate	\$25.00
State Bar Certificate	\$25.00
Total:	\$50.00

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STOHLER ADR PLLC

243 Steele Road - Suite 134
West Hartford, CT 06117
203-592-7818
dcs@StohlerADR.com
StohlerADR.com

dep = \$5,000
SLS pays half

March 18, 2021

VIA ELECTRONIC MAIL

Ricardo J. Prieto
Shellist Lazarz Slobin LLP
11 Greenway Plaza Suite 1515
Houston, TX 77046
Email: rprieto@eeoc.net

Jeremy T. Naftel
Martenson Hasbrouck & Simon LLP
455 Capitol Mall, Suite 601
Sacramento, CA 95184
Email: jnaftel@martensonlaw.com

Re: Reginald Moore et al. v. Universal Protection Service, LP et al.
Civil Action No. 5:19-cv-002124-JGB-SB

Dear Counsel:

Thank you for selecting me to mediate this dispute. This letter confirms the engagement and outlines my expectations for the process based on my experience for successful mediations. Of course, this is your Mediation and the parties can alter any of these procedures by agreement.

STOHLER ADR PLLC does not have a conflict.

The Mediation will be held on April 15, 2021 at 10 a.m.(EST) via Zoom Technologies. The Mediation is not expected to exceed one day although I am available to work past normal business hours on that day. We can discuss my availability for subsequent sessions if necessary. My expectation is that the appropriate parties will be present with the authority to settle the case.

Please send confidential, ex-parte pre-Mediation statements by April 8, 2021. Please make sure the statements provide me the factual background, the key pleadings, a chronology, an overview of the legal issues and relevant law, potential damages, your current settlement positions and any obstacles to settlement. Please identify who will be present at the Mediation.

My expectation is that the usual rules regarding my role as a mediator will be followed. That is, the process will be private and confidential, and I will not be expected to testify in any further proceeding. I also will not be held liable for any act or omission in connection with the Mediation. I will explain these points to the parties at the beginning of the Mediation. My procedure will be informal based upon what seems appropriate at the time. We will plan not to have opening statements.

The Parties will split my fees. My current hourly rate is \$600.00. I will charge by the hour for reviewing the pre-Mediation statements, the day of the Mediation, and any services rendered following the Mediation. In the event the Mediation is cancelled less than one week

before the Mediation date, a cancellation fee of two hours (\$1,200.00) may be charged, except in emergency or other similar circumstances.

Please send a \$5,000.00 retainer in advance of the Mediation (split equally between Plaintiffs and Defendants). We will send a supplemental itemized invoice if the fees and expenses exceed this amount.

Of course, you have the right to terminate my services at any time. We will observe the Rules of Professional Conduct in this regard. If a dispute arises out of the obligation to pay STOHLER ADR PLLC's fees and expenses, it will be resolved by binding arbitration. That arbitration will be conducted before a panel of attorneys and laypersons. The rules for arbitration and fee disputes adopted by the Connecticut Bar Association will govern the arbitration. Please be advised that I will destroy my file, including any notes and documents, six months after the date of the conclusion of the Mediation.

Again, I appreciate you selecting me as your mediator. If you have additions or modifications to this letter, please let me know. Otherwise, please sign and return this signed engagement letter with your portion of the retainer no later than the date of the Mediation.

Very truly yours,



D. Charles Stohler

DCS

**Plaintiffs,
Reginald Moore et al.**



**Ricardo J. Prieto
Shellist Lazarz Slobin LLP**

**Defendants,
Universal Protection Service, LP**

**Jeremy T. Naftel
Martenson Hasbrouck & Simon LLP**

STOHLER ADR PLLC

#35641

243 Steele Road, Suite 134
West Hartford, CT 06117
United States
Phone: 203-592-7818
Email: dcs@stohlerADR.com
stohlerADR.com

Invoice To:
Ricardo J. Prieto
Shellist | Lazarz | Slobin LLP
11 Greenway Plaza, Suite 1515
Houston, Texas 77046

Payable To:
243 Steele Road, Suite 134
West Hartford, CT 06117
United States
Phone: 203-592-7818
Email: dcs@stohlerADR.com
stohlerADR.com

INVOICE

Invoice # 49
Date: 05/02/2021
Due On: 06/01/2021

Invoice Number	Total
49	\$7,050.00
Subtotal	\$14,100.00
Tax	\$0.00
Interest	\$0.00
Amount Due	\$4,550.00

STOHLER ADR PLLC

243 Steele Road, Suite 134
West Hartford, CT 06117
United States
Phone: 203-592-7818
Email: dcs@stohlerADR.com
stohlerADR.com

INVOICE

Invoice # 49
Date: 05/02/2021
Due On: 06/01/2021

Ricardo J. Prieto
Shellist | Lazarz | Slobin LLP
11 Greenway Plaza, Suite 1515
Houston, Texas 77046

Statement of Account

Outstanding Balance	New Charges	Amount in Trust	Payments Received	Total Amount Outstanding
(\$0.00	+ \$7,050.00	)-(\$0.00	+ \$2,500.00	= \$4,550.00

21-MOO-1277-00400

**Moore et al. v. Universal Protection Services, LP et al MEDIATION (P)
5:19-cv-02124-JGB-SP (M.D. CA).**

Type	Date	Notes	Quantity	Rate	Discount	Total
Service	03/15/2021	telephone conference with counsel re: Moore Mediation; related e-mails	1.50	\$600.00	100.0%	\$0.00
Service	04/06/2021	telephone conference with counsel re: case status and Mediation	0.30	\$600.00	100.0%	\$0.00
Service	04/08/2021	analysis of pleadings in preparation for Mediation	1.00	\$600.00	-	\$600.00
Service	04/09/2021	preparation for and telephone conference	3.50	\$600.00	-	\$2,100.00

		with counsel; analysis of premediation statements; related e-mails				
Service	04/12/2021	preparation for and telephone conference with counsel re: Mediation; analysis of materials and relevant law; related e-mails,	3.00	\$600.00	-	\$1,800.00
Service	04/14/2021	preparation for Mediation; telephone conference with counsel; analysis of materials and relevant law	3.00	\$600.00	-	\$1,800.00
Service	04/15/2021	preparation for and attendance at Mediation	13.00	\$600.00	-	\$7,800.00
Line Item Discount Subtotal						-\$1,080.00
Subtotal						\$14,100.00
Invoice Discount						50.0%
Total						\$7,050.00
Payment (05/02/2021)						-\$2,500.00
Balance Owing						\$4,550.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
49	06/01/2021	\$7,050.00	\$2,500.00	\$4,550.00
Outstanding Balance				\$4,550.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$4,550.00

Account	Balance
Stohler ADR Trust Account Balance	\$0.00
Total Account Balance	\$0.00

Please make all amounts payable to: Stohler ADR PLLC.

Please pay within 30 days.



SUPERIOR COURT OF CALIFORNIA
County of Sacramento
720 9th Street
Sacramento, CA 95814
916-874-5522—Website www.saccourt.ca.gov

Credit Card Authorization Form

Please complete one form per case number

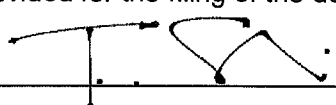
CARD HOLDER INFORMATION

Name on Card: Michael T. Slobin		
Card Holder Billing Address: 11 Greenway Plaza, Suite 1515		
City: Houston	State: Texas	Billing Zip: 77046
Telephone: 713-621-2277	Alt Telephone:	

DOCUMENT FILING INFORMATION

Case Number: 34-2019-00270901-CU-OE-GDS (only one case number per form)		
Filing Party Name: Ricardo J. Prieto	Title of Document to be Filed: Notice of Motion to Appear Pro Hac Vice	Filing Fee: \$500.00
Filing Party Name:	Title of Document to be Filed:	Filing Fee:
Filing Party Name:	Title of Document to be Filed:	Filing Fee:
Filing Party Name:	Title of Document to be Filed:	Filing Fee:
		TOTAL:

PAYMENT AUTHORIZATION

Card Type: ☒ Visa ☐ MasterCard	
Card Number: 4246 3152 7950 3070	Exp. Date: 11/23
Card CVV #: 326 (3 digits on back of card)	Credit Card Billing Zip 77046
I authorize Superior Court of California, County of Sacramento to charge \$ 500.00 (total amount) to the credit card provided for the filing of the document(s) listed above.	
Signature: 	Date: 6/11/20



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-14648-Moore_Hakeem-TrueFiling: Service Notification - CA 3rd District Court of Appeal - Case No. C093428

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Wed, Feb 24, 2021 at 2:38 PM

As I was filing this through "TrueFiling" I saw a \$21.00 charge for filing, but I didn't receive any kind of receipt.

Susan Cavanaugh
Legal Assistant
Shellist | Lazarz | Slobin LLP
11 Greenway Plaza | Suite 1515 | Houston, Texas 77046
Tel: 713.621.2277 | Fax: 713.621.0993
scavanaugh@eeoc.net | www.eeoc.net



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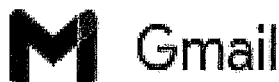
From: <info@truefiling.com>
Date: Wed, Feb 24, 2021 at 2:19 PM
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To: <marbuckle@eeoc.net>

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- Document Title: 2021_02_24 - Mediation Statement - FINAL TO FILE
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- Melinda Arbuckle - e-Serve marbuckle@eeoc.net
- Robin Largent - e-Serve rlargent@martensonlaw.com
- Scott Cole - e-Serve scole@scalaw.com



Hopkins, Danielle <dhopkins@eeoc.net>

RJP-Moore_Hakeem-14648 - TrueFiling: Service Notification - CA 3rd District Court of Appeal - Case No. C093428

1 message

Cavanaugh, Susan <scavanaugh@eeoc.net>
To: Danielle Hopkins <dhopkins@eeoc.net>

Thu, May 6, 2021 at 5:25 PM

See attached. \$21.00 Total

Susan Cavanaugh
Legal Assistant

Shellist | Lazarz | Slobin LLP

11 Greenway Plaza | Suite 1515 | Houston, Texas 77046

Tel: 713.621.2277 | Fax: 713.621.0993

scavanaugh@eeoc.net | www.eeoc.net



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Link: Click to download document
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- Lauren Kalfsbeek - e-Serve lbakke@martensonlaw.com
- Melinda Arbuckle - e-Serve marbuckle@eeoc.net
- Nicole Randle - e-Serve nrandle@scalaw.com
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- Robin Largent - e-Serve rlargent@martensonlaw.com
- Scott Cole - e-Serve scole@scalaw.com
- Susan Cavanaugh - e-Serve scavanaugh@eeoc.net