UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JACOB SILVER, *on behalf of herself and others similarly situated,*

Plaintiff,

v.

LIVEWATCH SECURITY, LLC d/b/a BRINKS HOME SECURITY f/k/a BOLSTER LLC d/b/a SAFEMART; MONITRONICS INTERNATIONAL, INC. d/b/a BRINKS HOME SECURITY,

Defendants.

Civil Case No.:
2:20-cv-02478 (JS)(AYS)

SUPPLEMENTAL DECLARATION OF DANIEL A. SCHLANGER IN SUPPORT OF CLASS COUNSEL'S MOTION FOR ATTORNEY'S FEES, COSTS, AND SERVICE AWARD

DANIEL A. SCHLANGER, an attorney duly licensed to practice law in the State of New York and admitted to practice in this Court, does hereby declare under the penalty of perjury that the following is true and correct:

1. I am the managing partner of Schlanger Law Group LLP.

2. I am Co-Class Counsel in this matter and am familiar with the facts and documents relevant to this dispute.

3. The parties' settlement was preliminarily approved on January 13, 2022. Docket Entry No. 51.

4. Consistent with the parties' Settlement Agreement and in advance of the parties'

Motion for Final Approval, I make this Supplemental Declaration in support of Class Counsel's request for an award of $131,666 in attorney's fees and costs.

5. Specifically, I make this declaration to properly set before the Court Class Counsel's hourly rates, time and costs to date.

6. I also make this Declaration to attest to the consistent and significant involvement of the named plaintiff, Jacob Silver, throughout this litigation.

I. Qualifications and Experience[1]

7. I am a 2004 graduate of Harvard Law School, *cum laude*.

8. Following law school, I clerked for one year on the United States Court of Appeals 11th Circuit for the Honorable R. Lanier Anderson, III.

9. From mid-2006 through mid-2007, I worked as a staff attorney at the Legal Aid Society of Cleveland, where I was a member of the Consumer Protection practice group.

10. I joined Schlanger Law Group's predecessor firm, Schlanger & Schlanger, LLP in August, 2007.

11. My practice has focused virtually exclusively on representation of consumers pursuant to federal and state consumer protection statutes.

12. The large majority of these litigations have involved affirmative individual or class action claims brought in federal court.

13. Attached hereto as **Exhibit A** is a true and correct copy of a table of "Selected Consumer Litigation for Daniel A. Schlanger", which contains a detailed listing of over one

[1] My credentials were previously set forth in my declaration in support of preliminary approval. ECF 48. I include this information again here, with minor updates, for ease of reference.

hundred (100) such matters I have handled since going into private practice in 2007. These matters include multiple class actions, as well as individual cases, appeals, and fully litigated arbitrations.

14. I have also resolved a large number of consumer claims under state and federal consumer protection statutes at the pre-litigation stage.

15. I am a member in good standing of the bar of the states of New York and New Jersey and of the U.S. District Courts for the Southern, Northern, Eastern, and Western Districts of New York and the District of New Jersey.

16. I am also a member in good standing of the U.S. Court of Appeals, Second Circuit and the U.S. Supreme Court.

17. I am also admitted in Ohio and was in good standing there until I took inactive status in 2013.

18. I am a former member of the New York City Bar Association Professional Responsibility Committee, serving from 2009-2010.

19. From 2010 to Fall 2013, I served on the New York City Bar's Civil Court Committee.

20. From Fall 2013 to Spring 2015, I served on the New York City Bar's Consumer Affairs Committee.

21. I am a member of the National Association of Consumer Advocates, and served from 2010 through 2012, and from Spring 2015 through 2020 on that organization's Education/Professional Development Committee.

22. I currently also serve on the National Association of Consumer Advocates Issues Committee (which is responsible for that organization's amicus participation in appellate cases across the country, including the U.S. Supreme Court).

23. I speak regularly on consumer law topics at CLE events and other lawyer-focused fora. For example:

- On May 28, 2021, I presented a Lawline CLE titled, "Representing Victims of Identity Theft And Other Unauthorized Charges: Federal Claims Against Financial Institutions & Credit Bureaus";
- On May 25, 2021, I presented a Lawline CLE titled, "Representing Victims of Inaccurate Credit Reporting: Identifying & Litigating Fair Credit Reporting Act Claims";
- On March 12, 2019, I co-presented a CLE at the National Consumer Law Center Conference titled, "Valuing Companies for FDCPA Class Actions: Dealing with Claims of Low, No or Negative Net Worth";
- On February 8, 2017, I presented a Lawline CLE titled "Using TILA To Challenge Predatory Auto Lending";
- On July 28, 2016, I presented a Lawline CLE on "The Fair Debt Collection Practices Act: Bringing Suit Based On State Court Litigation And Judgment Enforcement Misconduct";
- On October 11, 2015, I presented regarding FDCPA issues at the advanced FDCPA litigator's session of the National Consumer Litigation Conference, in San Antonio, Texas;
- In September 2015, I presented a National Association of Consumer Advocates webinar on assignee liability in auto fraud cases;
- In Fall 2012, I presented a webinar for the same organization regarding consumer law practice management and case selection issues;

- I also served as a panelist for a CLE training for volunteer attorneys on consumer protection issues, sponsored by the New York City Bar Association and Fordham Law School's Feerick Center for Social Justice (Spring 2012).
- From 2011 to 2014, I regularly served as a consumer law expert in CLARO clinics for pro se litigants in Westchester and Manhattan from 2011 through 2014, where I advised volunteer attorneys assisting consumers with consumer law matters.

24. From mid-2012 through Spring 2014, I served as the Chair of the Westchester CLARO program's Steering Committee.

25. In May of 2013, I was awarded a New York State Bar Association's President's award for my pro bono work on behalf of consumers.

26. In August 2013, I was awarded the White Plains, New York Rotary Club's annual award for business ethics.

27. I have published on consumer law issues. These publications include:

a. *Assisting the Consumer Debtor: Becoming Aware of Potential Affirmative Claims*, New York State Bar Association, One on One (Quarterly Publication of the General Practice Section) Fall 2009, Vol. 30, No.3;

b. *Assisting the Consumer Debtor, Part II: Defenses To Consumer Credit Claims*, New York State Bar Association, One on One (Quarterly Publication of the General Practice Section), Winter 2009, Vol. 30, No.4; and

c. *Assisting the Consumer Debtor, Part III: Improper Service*, New York State Bar Association, One on One (Quarterly Publication of the General Practice Section), Spring/Summer 2010, Vol. 31, No.2.

28. As set forth in the attached list of selected cases, I have been appointed class counsel in numerous consumer class action cases.

29. More generally, I am a committed, skilled, knowledgeable, federal litigator who has dedicated his career to consumer protection.

30. My co-Class Counsel in this matter is Beth E. Terrell of the Terrell Marshall Law Group PLLC. As set forth in her contemporaneously filed Declaration, Ms. Terrell is an extraordinarily accomplished consumer attorney with extensive consumer class action experience.

31. My firm has been involved in every facet of the litigation, including initial case planning, drafting initial and amended pleadings, drafting merits submissions; strategy; client communications; drafting discovery requests and discovery responses; review, analysis and compilation of voluminous discovery materials include class-wide, account-level data aggregation; discovery-related meet and confers; discovery dispute letters written communications with the Court; attendance and participation at court conferences; informal settlement negotiations; both the settlement conference before the Magistrate Judge and the subsequent private mediation (including pre-conference and pre-mediation briefs), settlement-related drafting, preliminary approval-related work, etc.

32. My firm has zealously represented Mr. Silver and the Settlement Class throughout this litigation.

33. The experience and credentials of the other attorneys and support staff at my law firm who worked on this case were not included in my prior Declaration in support of preliminary approval and are therefore set forth herein. **Exhibits B** through **D.**

II. Attorney's Fees & Costs

34. Pursuant to the Settlement Agreement, Class Counsel seeks an award of attorney's fees and costs totaling one third of the $395,000.00 Settlement Fund achieved for the class, *i.e.* attorney's fees of $131,666.00. Settlement Agreement, ⁋ 30(a).

A. *Hourly Rates*

35. My regularly charged hourly rate is currently $625/hour in non-contingent matters, including non-contingent consumer litigations.

36. In 2021, I was awarded my then-current rate of $600/hour by this Court for my work as class counsel in *Diallo v. Immediate Credit Recovery, Inc.,* (18-cv-00470-KAM-SJB) (E.D.N.Y.).

37. I was also awarded my then-current rate of $600/hour by this Court in 2021 for my work as class counsel in *Carrillo v. Wells Fargo Bank, N.A.,* (2:18-CV-03095-PKC) (E.D.N.Y.).

38. In 2019, I was approved at the rate of $550.00/hour for work as Class Counsel in *Midland Funding LLC Interest Rate Litigation* (7:11-cv-08149-LMS) (S.D.N.Y.).

39. In 2018, I was approved at the rate of $450.00/hour for my work as Class Counsel in *Daisley v. West Creek Financial, Inc.* (1:18-cv-03555-BMC) (E.D.N.Y.).

B. *Experience, Credentials and Rates of Other Schlanger Law Group Attorneys and Staff Working on Case*

40. I have acted as co-lead counsel in this matter to date, including investigating and litigating the claims in this case, and have zealously represented Jacob Silver and the proposed class since the case's inception in June, 2020.

41. Payment of my firm's fees has always been contingent on successfully obtaining relief for Mr. Silver and the proposed Class.

42. This meant my firm risked recovering nothing for the work we performed, a risk that was substantial in light of the challenges inherent in the case. Other Schlanger Law Group attorneys, staff members, and I worked on this case instead of other matters that likely would have generated fees.

43. In addition to my work on this case, attorneys Evan S. Rothfarb, Arjun Shah, and

Isaac Taubes worked significant hours on this matter.

44. Mr. Rothfarb is my law partner, a graduate of Cornell Law School, a former federal law clerk and a seasoned federal litigator with extensive consumer class action experience. His cv is attached hereto as **Exhibit B**.

45. Mr. Shah's is currently an associate attorney at my firm. Mr. Taubes is a former associate at my firm. Their respective resumes are attached hereto as **Exhibit C**.

46. Schlanger Law Group LLP paralegals Jaclyn Osterlof, Alan Frazin, and Linda Soza also worked significant hours on this matter. Their respective resumes are attached as **Exhibit D**.

47. The hourly rates sought herein are Schlanger Law Group's current, regular hourly rates in non-contingent, fee-for-service litigations.

C. *Number of Hours*

48. As of the date of this Declaration, Class Counsel has expended over 600 hours on this matter, including investigating and researching the claims, preparing the complaint and amended complaint; issuing and responding to paper discovery, numerous discovery meet and confers, discovery-related court submissions, analysis of voluminous class data, preparation of merits letter briefs, pre-settlement conference and pre-mediation briefs, client communications and client preparation, participation in both a settlement conference and private mediation, extensive settlement-related negotiations and drafting, coordination of settlement administration, preliminary approval-related drafting, etc.

49. Schlanger Law Group LLP's lodestar fees to date total $103,827.50.

50. Schlanger Law Group LLP's costs to date total $4,742.71.

51. Thus, Schlanger Law Group LLP's lodestar fees plus costs to date total $108,570.21.

52. Specifically, Schlanger Law Group LLP's lodestar and expense calculations are summarized as follows:

Staff	**Hours**	**Rate/hour**	**Total**
Daniel A. Schlanger	92.3	$625	$57,687.50
Evan S. Rothfarb	11.8	$550	$6,490.00
Arjun D. Shah	77.6	$425	$32,980.00
Isaac Taubes	6.8	$425	$2,550.00
Paralegals	20.6	$200	$4,120.00
Total Fees	209.1		$103,827.50
Expenses			$4,742.71
Total Fees and Costs:			$108,570.21

53. Schlanger Law Group LLP's time and expense records are attached hereto as **Exhibit E**. Prior to submitting these records, I exercised billing judgment and deleted numerous entries that reflected work of an overly clerical nature. In addition, I reduced the amount of time shown where, in my view, an entry reflected inefficiency or duplication of effort.

54. As set for in the Declaration of co-Class Counsel Beth Terrell, Terrell Marshall Law Group's lodestar fees total $171,410.

55. As set forth therein, Terrell Marshall Law Group's costs total $3,283.26.

56. As set forth in Ms. Terrell's Declaration, Terrell Marshall Law Group's lodestar fees and costs, are summarized as follows:

Staff	**Hours**	**Rate/hour**	**Total**
Beth Terrell	12.5	$650	$8,125.00
Adrienne McEntee	36.2	$600	$21,720.00
Ben Drachler	330.9	$400	$132,360.00
Eden Nordby	4.2	$325	$1,365.00
Heather Brown	4.1	$200	$820.00
Jodi Nuss	35.1	$200	$7,020.00
Total Fees	423.0		$171,410.00
Expenses			$3,283.26
Total Fees and Costs			$174,693.26

57. Thus, Class Counsel have total lodestar fees of $283,263.47 (representing 632 total hours and total costs of $8,025.97).

58. Even absent any objections or unanticipated contested issues, additional time, of course, will be necessary to bring this matter to conclusion, e.g. in connection with the fairness hearing, final approval, class administration logistics and fielding class member inquiries.

59. As reviewed in Class Counsel's supporting brief, Class Counsel's proposed fees and costs of $131,666.00 – totaling one-third of the Settlement Fund – is significantly less than Class Counsel's lodestar.

60. As reviewed in Class Counsel's supporting brief, Courts in this jurisdiction routinely approve multipliers of 3-5 times lodestar, whereas Class Counsel here requests a figure that represents a 54% discount from Class Counsel's lodestar.

61. In sum, the requested fee award is eminently reasonable and appropriate in light

of the result achieved, the risks inherent in continued litigation and services provided by Class Counsel.

III. Service Award

62. I also write to confirm Mr. Silver's exceptional participation in this matter.

63. Mr. Silver engaged meaningfully at every stage of the litigation, including with regard to development of the facts of the case, providing supporting documentation, working with Class Counsel to respond to discovery, attending the settlement conference and mediation, reviewing and providing feedback on settlement demands and counters, etc.

64. At every stage, he has been diligent in staying apprised of the case, keeping Class Counsel apprised of relevant factual developments, and providing feedback and input on litigation-related topics, including with regard to pleadings, discovery and settlement.

65. In short, he has been a model named plaintiff and has diligently fulfilled all of his duties to the class.

66. The parties' proposed service award to Mr. Silver of $10,000 is appropriate and in line with service awards regularly approved by this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 25, 2022

Respectfully Submitted,

/s/Daniel A. Schlanger

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EXHIBIT A

SELECTED CONSUMER LITIGATION
DANIEL A. SCHLANGER

I. Selected Federal Litigation

A. Consumer Class Action Litigation

i. *Carrillo v. Wells Fargo Bank, N.A.*, 2:18-CV-03095 (E.D.N.Y.) (approved TILA/breach of contract class action). *See*, 2019 U.S. Dist. LEXIS 80634 (E.D.N.Y. May 10, 2019);

ii. *Cheng v. HSBC Bank USA, N.A.*, 20-CV-1551 (E.D.N.Y.) (pending EFTA class action). *See*, 467 F. Supp. 3d 46 (E.D.N.Y. 2020); 2021 U.S. Dist. LEXIS 1634 (E.D.N.Y. Jan. 4, 2021);

iii. *Cheng v. TD Bank, N.A.*, 21-cv-3282 (E.D.N.Y.) (pending EFTA class action);

iv. *Coble, et al. v. Cohen & Slamowitz, et al.,* 11-CV-01037 (S.D.N.Y.) (approved FDCPA/GBL class action). *See*, 824 F. Supp. 2d 568 (S.D.N.Y.) (denying defendants' motion to dismiss);

v. *Cohen et al. v. Allegiance Administrators, LLC d/b/a Performance First*, 20-CV-03411 (S.D.OH) (pending class action). *See*, 2022 U.S. Dist. LEXIS 69692 (S.D. Ohio Apr. 15, 2022);

vi. *Daisley v. West Creek Financial, Inc.*, 1:18-CV-03555 (E.D.N.Y.) (approved rent-to-own class action);

vii. *Diallo v. Immediate Credit Recovery, Inc. et al.*, 1:18-CV-00470 (E.D.N.Y.) (approved FDCPA/GBL class action);

viii. *De La Paz v. Rubin & Rothman, LLC & Keith Rothman,* 11-CV-9625 (S.D.N.Y.) (approved FDCPA/GBL class action);

ix. *Granados v. OnPoint Community Credit Union*, 21-cv-00847 (Dist. Oregon) (pending EFTA class action);

x. *In re Porsche Cars North America, Inc., Plastic Coolant Tubes Products Liability Litigation,* 11-MD-2233 (Consolidated in S.D. Ohio) (approved MDL product defects class action) (member, executive committee). *See,* 880 F. Supp. 2d 801 (S.D. Ohio 2012); 2014 U.S. Dist. LEXIS 88693 (S.D. Ohio June 30, 2014) *aff'd* summary order (6th Cir. 14-3421, 7/13/15)

xi. *Jurs v. Transworld Systems Inc.* 17-CV-1030 (N.D.N.Y.) (approved FDCPA/GBL class action);

xii. *Klippel v. Portfolio Recovery Associates, LLC*, et al., 15-CV-1061 (N.D.N.Y.) (approved FDCPA/GBL class action);

xiii. *In re Midland Funding LLC Interest Rate Litigation,* 11-CV-814 (S.D.N.Y.) (approved FDCPA/usury class action). *See*, 2015 U.S. App. 8483, 786 F.3d 246 (2d Cir. 2015); 2017 U.S. Dist. LEXIS 27109 (S.D.N.Y. Feb. 27, 2017);

xiv. *Miranda v. CACH LLC, et al.,* 15-CV-0627 (N.D.N.Y.) (approved FDCPA/GBL class action);

xv. *Moy v. Eltman, Eltman & Cooper, PC,* 12-CV-02382 (E.D.N.Y.) (approved FDCPA/GBL class action);

xvi. *Nelipa, et al. v. TD Bank, N.A.*, 21-cv-01092 (E.D.N.Y.) (pending EFTA class action);

xvii. *Ruffin v. Kirschenbaum & Phillips P.C., et al.*, 20-CV-05422 (S.D.N.Y.) (pending FDCPA class action);

xviii. *Santos et al. v. Metro Portfolios, Inc., et al.*, 20-CV-06706 (S.D.N.Y.) (pending FDCPA class action);

xix. *Silver v. Livewatch Security, LLC d/b/a Brinks Home Security f/k/a Bolster LLC d/b/a Safemart, et al.*, 20-CV-02478 (E.D.N.Y.) (case at bar) (pending GBL/Breach of Contract class action);

xx. *Sessa v. Linear Motors, LLC, et al.*, 19-CV-9914 (S.D.N.Y.) (appeal pending) (pending TILA and FCRA class action);

xxi. *Thomas v. Sherwin Robins, et al.*, 16-CV-2529 (N.D.Ga) (approved FDCPA class action). See, 2017 U.S. Dist. LEXIS 227255 (N.D. Ga. Sep. 7, 2017);

xxii. *Thorne et al. v. Square, Inc., et al.*, 20-CV-05119 (E.D.N.Y.) (pending EFTA class action);

xxiii. *Tito v. Rubin & Rothman, LLC & Keith Rothman,* 12-CV-3464 (E.D.N.Y.) (approved FDCPA/GBL class action);

xxiv. *Winslow v. Forster & Garbus, LLP, et al.,* 15-CV-02996 (E.D.N.Y) (approved FDCPA/GBL class action). *See* 2017 U.S. Dist. LEXIS 205113 (E.D.N.Y. Dec. 13, 2017) (certifying class and denying Defendant's motion for Summary Judgment);

B. Individual Fair Debt Collection Practices

i. *Blair v. Forster & Garbus,* 09-CV-2407 (S.D.N.Y.);

ii. *Bolaños v. Arrow Financial Services, LLC and Rubin & Rothman, LLC,* 10-CV-07243 (S.D.N.Y.);

iii. *Buelow v. Plaza Motors of Brooklyn, Inc. d/b/a Plaza Honda*, 17-cv-04288 (E.D.N.Y.);

iv. *Darby v. Palisades Collection, LLC and Pressler & Pressler, LLP,* 11-CV-1673 (E.D.N.Y.);

v. *Dewey v. Midland Credit Management, Inc. et al.,* 10-CV-7857 (S.D.N.Y.);

vi. *Diaz v. Portfolio Recovery Assoc., LLC, 10-CV-3920* (E.D.N.Y.) 2012 U.S. Dist. LEXIS 25802 (E.D.N.Y. Feb. 28, 2012), *adopted by, objections overruled by*, 2012 U.S. Dist. LEXIS 72724 (E.D.N.Y. May 23, 2012);

vii. *DiMatteo v. Sweeney, Gallo, Reich & Bolz*, 13-CV-8451 (S.D.N.Y.) *See,* 2015 U.S. App. LEXIS 12250 (2d Cir. July 16, 2015)(reversing dismissal);

viii. *Douyon v. NY Med. Health Care, P.C.,* 10-CV-3983 (E.D.N.Y). *See*, 2011 U.S. Dist. LEXIS 47850 (E.D.N.Y. May 4, 2011) (striking defendants' answer and sanctioning defendants); 894 F. Supp. 2d 245 (granting in part and denying in part parties' cross motions for summary judgment), plaintiffs' motion for reconsideration granted at 2013 U.S. Dist. LEXIS 138053 (E.D.N.Y. Sept. 25, 2013); 49 F. Supp. 3d 328 (E.D.N.Y. 2014) (awarding attorney's fees);

ix. *Hauseman v. Consumer Recovery Associates and ICS & Associates,* 11-CV-00772 (E.D.N.Y.);

x. *Healy v. Enterprise Recovery Systems, LLC,* 11-CV-3295 (S.D.N.Y.);

xi. *Hernandez v. Erin Capital Mgmt., LLC*, 10-CV-1695 (C.D.Ca). *See*, 2011 U.S. Dist. LEXIS 114133 (C.D.Ca 2011);

xii. *Levy v. Law Offices of J. Henry Nierman, et al.,* 17-CV-004022 (S.D.N.Y) (pending);

xiii. *Mason v. Midland Credit Management, Inc.*, 12-CV-4861 (S.D.N.Y.);

xiv. *Molina v. Windels, Marx, Lane & Mittendorf, LLP,* 11-CV-02995 (S.D.N.Y.);

xv. *Muradov v. Forster & Garbus LLP*, 15-CV-2276 (S.D.N.Y.);

xvi. *O'Connor v. Municipal Credit Union, et al.,* 17-cv-02860 (S.D.N.Y.);

xvii. *Rathburn v. Sharinn & Lipshie, P.C. et al.,* 10-CV-04449, (S.D. Tex. 2010);

xviii. *Renken-Sebastian v. Retrieval Masters Creditors Bureau, Inc.*, 14-CV 390, (S.D.N.Y.);

xix. *Robert v. Cohen & Slamowitz, LLP*, 12-CV-2551 (E.D.N.Y.);

xx. *Robertson v. Capital Management Services, P.C.,* 12-CV-4860 (S.D.N.Y.);

xxi. *Shepherd v. Law Offices of Cohen & Slamowitz, LLP*, 08-CV-6199 (S.D.N.Y.). *See*, 668 F.Supp. 2d 579 (S.D.N.Y. 2009).

xxii. *Simmons v. Collection Bureau Hudson Valley. Inc.,* 08-CV-6407 (S.D.N.Y.);

xxiii. *Simmons v. Security Credit Systems. Inc.,* 08-CV-7701 (S.D.N.Y.);

xxiv. *Singleton v. New Century Financial Services, Inc., et al.,* 10-CV-3982 (E.D.N.Y.);

xxv. *Taronji v. Mel S. Harris & Associates, LLC,* 08-CV-2126 (E.D.N.Y.);

xxvi. *Thomas v. Kirschenbaum & Phillips, P.C., et al.*, 14-CV-06446 (S.D.N.Y.);

xxvii. *Trinidad v. David J. Gold, P.C. and David J. Gold, Esq.,* 11-CV-1744 (E.D.N.Y.);

xxviii. *Webster v. Asset Acceptance, LLC, et al.,* 11-CV-00670 (S.D.N.Y. 2011);

xxix. *Dempsey v. Navy Federal Credit Union,* 11-CV-0166 (E.D.N.Y. 2011) (FCBA);

xxx. *Johnston v. Capital One,* 11-CV-02269 (S.D.N.Y.) (FCBA);

xxxi. *Vargas v. Kavulich & Associates, P.C.*, 16-CV-08680 (S.D.N.Y.);

xxxii. *Velazquez v. Kavulich & Associates, P.C.*, 17-cv-07401 (S.D.N.Y).

C. Auto Fraud Litigation

i. *Ahmed v. Planet Motor Cars, Inc., Santander Consumer USA Holdings, Inc., et al.*, 15-CV-0284, (E.D.N.Y);

ii. *Alkhatib v. New York Motor Group., LLC*, 2015 U.S. Dist. LEXIS 72055 (E.D.N.Y.);

iii. *Baccas, et al. v. Nissan of New Rochelle, et al.,* 17-CV-03207 (S.D.N.Y.);

iv. *Banon v. M&T Bank*, 14-CV-4691 (E.D.N.Y.);

v. *Chattopadhyay et al. v. Baron Cohen Auto Group, Inc. et al.*, 21-cv-06695 (E.D.N.Y.) (pending);

vi. *Chowdhury v. NY Motor Group, et al.*, Case No. 14-CV-2981 (E.D.N.Y.);

vii. *Dong v. NY Motor Group, et al.*, 14-CV-2980 (E.D.N.Y.);

viii. *Freire v. NY Motor Group, et al.*, 13-CV-7291 (E.D.N.Y.);

ix. *Gabrys v. NY Motor Group, et al.,* 13-CV-7290 (E.D.N.Y.);

x. *Gaspard v. Kings Autoshow Inc. et al.*, 20-cv-02896 (E.D.N.Y.);

xi. *Gutierrez, et al. v. East Hills Chrysler-Plymouth Inc, et al.*, 17-CV-6953 (E.D.N.Y.);

xii. *Islam, et al. v. Lee's Motors, Inc., et al.,* 17-CV-03955 (E.D.N.Y.). *See*, 2018 U.S. Dist. LEXIS 170998 (E.D.N.Y. Sep. 30, 2018);

xiii. *Lawson v. Mercedes-Benz Financial Services USA LLC, et al.*, 21-cv-06014 (E.D.N.Y.) (pending);

xiv. *Magliocca v. Auto Gallery Imports, et al.,* 09-CV-0766 (E.D.N.Y.);

xv. *Omilig v. Auto Mall 46, Inc.,* (AAA Case No. 18 420 00547) (arbitrated through decision, treble damages awarded);

xvi. *Pierre v. Planet Automotive, Inc., et al.,* 13-CV-675 (E.D.N.Y.), *See*, 2016 U.S. Dist. LEXIS 150557, 2016 WL 6459617 (E.D.N.Y. Oct. 31, 2016);

xvii. *Pyskaty v. Wide World of Cars, LLC and BMW Bank of North America*, 15-CV-1600 (S.D.N.Y.), 856 F.3d 216 (2d Cir. N.Y. May 10, 2017);

xviii. *Roa v. Carsbucks, Inc.*, 17-CV-00817 (E.D.N.Y.);

xix. *San Antonio & Jimenez-Veloz v. Northern Auto Traders, LLC, et al.,* 11-CV-1415 (E.D.N.Y.);

xx. *So v. Nemet Motors, LLC, et al.,* 11-CV-0168 (E.D.N.Y.);

xxi. *Tawiah v. Eternity Auto Center Corp., et al.*, 15-CV-02342 (E.D.N.Y.);

xxii. *Thompson v. Rallye Motors, LLC*, JAMS Reference No. 1425008642 (settled at conclusion of JAMS arbitration, prior to decision);

xxiii. *Vasquez v. Major World Chevrolet, LLC and Capital One Auto Finance, Inc.*, 16-CV-06815 (E.D.N.Y.);

xxiv. *Velazquez v. L.I. Autoworld, Inc. d/b/a Generation Kia, et al.*, 20-cv-01055 (E.D.N.Y.).

D. Fair Credit Reporting Act/Identity Theft Litigation

i. *Abdallah v. LexisNexis Risk Solutions FL, Inc., et al.*, 19-CV-03609 (E.D.N.Y.) (pending). *See*, 2021 U.S. Dist. LEXIS 248117 (E.D.N.Y. Dec. 30, 2021);

ii. *Abdur-Rashid v. Citibank, N.A.*, 21-cv-06276 (E.D.N.Y.) (pending);

iii. *Ayala v. Sallie Mae et al.*, 21-cv-05322 (S.D.N.Y.) (pending);

iv. *Bien-Aime v. Experian Information Solutions, Inc.*, 19-CV-06961 (E.D.N.Y.);

v. *Bien-Aime v. Nordstrom, Inc., et al.*, 19-CV-04701 (E.D.N.Y.);

vi. *Brefo v. JPMorgan Chase Bank, N.A.*, 19-CV-01338 (S.D.N.Y.);

vii. *Burman v. Citibank, N.A.*, 01-21-0016-1006 (AAA) (pending);

viii. *Domingue v. Discover Financial Services, LLC, et al.*, 18-CV-06144 (E.D.N.Y.);

ix. *Dominik et al. v. Wells Fargo Bank, N.A., et al.*, 20-CV-04021 (E.D.N.Y.) (pending);

x. *Fields v. Equifax Information Services LLC, et al.*, 20-CV-0895 (S.D.N.Y.);

xi. *Francis v. Equifax Information Services LLC, et al.*, 20-CV-00584 (N.D.N.Y.) (pending);

xii. *Gomez v. JPMorgan Chase Bank, N.A.*, 5220000032 (JAMS) (pending);

xiii. *Green v. Capital One, N.A., et al.*, 20-CV-04655 (S.D.N.Y.) (pending). *See*, 2021 U.S. Dist. LEXIS 161837 (S.D.N.Y. Aug. 26, 2021);

xiv. *Haddad v. Citizens Bank, N.A., et al.*, 19-CV-06176 (W.D.N.Y.);

xv. *Hart v. Equifax Information Services LLC, et al.*, 19-CV-342 (N.D.N.Y.) (pending). *See*, 2019 U.S. Dist. LEXIS 167707 (N.D.N.Y. Sep. 30, 2019);

xvi. *Hasson v. HSBC Bank USA, N.A.*, 20-CV-1024 (S.D.N.Y.);

xvii. *Islam v. Experian Information Solutions, Inc., et al.,* 18-CV-01021 (E.D.N.Y.);

xviii. *Jarnicki v. Equifax Information Services LLC, et al.*, 18-CV-10631 (S.D.N.Y.);

xix. *Koniuk et al. v. TD Bank, N.A.*, 20-CV-02376 (E.D.N.Y.) (pending);

xx. *Lara v. Santander Bank, N.A.*, 20-CV-00855 (E.D.N.Y.);

xxi. *Liu v. TD Ameritrade, Inc.*, 18-CV-6764 (E.D.N.Y.);

xxii. *Lombardo v. Equifax Information Services LLC, et al.*, 20-CV-06813 (S.D.N.Y.) (pending);

xxiii. *Morgan v. Discover Bank, et al.*, 17-CV-2452 (E.D.N.Y.);

xxiv. *Nguyen et al. v. JPMorgan Chase Bank, et al.*, 5100000028 (JAMS) (pending);

xxv. *Potente v. Equifax Information Services LLC, et al.*, 19-CV-04050 (S.D.N.Y.);

xxvi. *Regan v. Equifax Information Services LLC, et al.*, 17-CV-06167 (S.D.N.Y);

xxvii. *Somma v. Equifax Information Services LLC, et al.*, 19-CV-04716 (E.D.N.Y.);

xxviii. *Stewart v. American Express National Bank*, 19-CV-11432 (S.D.N.Y.);

xxix. *Tracey v. Equifax Information Services LLC, et al.*, 17-cv-06166 (S.D.N.Y);

xxx. *Valdez v. TD Bank, N.A.*, 19-CV-02115 (E.D.N.Y.);

xxxi. *Zumbo v. Experian Information Solutions, Inc. et al.*, 17-cv-04820 (E.D.N.Y.).

E. <u>Other Significant Federal Litigation</u>

i. *Anastassopoulos v. Hospital for Special Surgery, et al.*, 17-cv-04345 (S.D.N.Y.) (False Advertising and Medical Malpractice) (settled);

ii. *Cisneros-Calderon, et al. v. Salinas*, 08-CV-6406 (S.D.N.Y.) (FLSA) (settled after entry of judgment);

iii. *Mendoza et al v. G & M Foods,* 08-CV-4498 (S.D.N.Y.) (FLSA). *See*, 2008 U.S. Dist. LEXIS 120758 (S.D.N.Y 2008) (settled).

II. Selected State Court Litigation

i. *Discover Bank v. Daniel Miller,* Index No. 1085/02 Sullivan County, Supreme Court, *See* Slip Op. dated 9/22/08 (vacating judgment, ordering release of restrained funds, and dismissing case);

ii. *FIA Card Services, N.A. v. Miguel Escobar,* 2010 N.Y. Misc. LEXIS 3729 (N.Y. City Civ. Ct. May 10, 2010)(dismissing motion to enforce arbitration award on grounds that arbitral forum was institutionally biased against consumers);

iii. *Stephen Ryder, et al. v. James J. Mullen. et al.*, Index No. 19442/07 Westchester County, Supreme Court, Slip Op Dated 6/18/08 (ordering return of homebuyer's $50,000 downpayment);

iv. *United States Bank Nat'l Ass'n v. Pia*, 2011 N.Y. Misc. LEXIS 4962 (N.Y. Sup. Ct. Oct. 7, 2011) (granting consumer rescission of home loan pursuant to the Truth In Lending Act); *affirmed* 106 A.D.3d 991 (2d Dept 2013); *leave to appeal denied*, 2013 LEXIS 2512 (Ct of Appeals, 9/17/13); 2014 N.Y. Misc. LEXIS 3841 (N.Y. Sup. Ct. Aug. 26, 2014) (holding bank in contempt for non-compliance with prior court orders and denying bank's motion to quash post-judgment discovery);

v. *Worldwide Asset Purchasing LLC v. Austin,* Index No. 85344/07 Bronx County Civil Court, *See* Slip Op. dated 8/7/12 (dismissing motion to enforce arbitration award, *inter alia*, on grounds that the arbitral form was institutionally biased against consumer).

Exhibit B

EVAN S. ROTHFARB

Schlanger Law Group, LLP ● 80 Broad Street, New York, NY 10004
(212) 500-6114 ● erothfarb@consumerprotection.net

LEGAL EXPERIENCE

Schlanger Law Group, LLP, New York, NY 2017 – Present

Partner Serve as a principal attorney in a multi-state consumer protection firm with emphasis on financial frauds and identity theft. Manage cases as lead counsel in class actions, individual high value cases, and arbitrations under the EFTA, FCBA, FCRA, FDCPA, TILA, Magnuson-Moss Consumer Warranty Act, and state UDAP statutes (including N.Y. Gen. Bus. Law §§ 349 and 350). Conduct hearings and depositions, appear for oral argument, oversee discovery, compose motions and memoranda, manage clients, perform case intake evaluations, contribute to marketing efforts, and supervise junior lawyers, paralegals, and support staff.

Rothfarb Law, PLLC, New York, NY 2009 – 2017

Member Founded a commercial litigation boutique with a strong client base including publicly traded companies, medium-sized businesses, and individuals. Provided representation in diverse matters in state and federal courts, including breach of contract, business torts, intellectual property infringement, and general commercial cases.

The Honorable James Knoll Gardner, Allentown, PA 2006 – 2008
United States District Court for the Eastern District of Pennsylvania

Law Clerk Assisted Judge during hearings, arguments and trials. Composed opinions, orders and internal memoranda in civil and criminal cases. Varied docket included bankruptcy, business torts, civil rights, contract, corporate governance, criminal, employment, environmental, intellectual property, and toxic tort cases.

Hoffinger Stern & Ross LLP, New York, NY 2005 – 2006

Associate Authored motions, legal memoranda, appellate briefs, pleadings and internal memoranda in a litigation boutique specializing in commercial law, consumer fraud class action defense, products liability, and white collar criminal defense. Argued motions, made court appearances, counseled clients, assisted in deposition preparation, and conducted settlement negotiations.

EDUCATION

Cornell Law School, Ithaca, NY
Juris Doctor, May 2005

Honors:	Editor, *Cornell Journal of Law and Public Policy*, Certificate in Advocacy
Moot Court:	Board Member (2003 – 2005), Vanderbilt Law National First Amendment (Quarter Finalist), Upper-class External Competition (Finalist), Cuccia Cup, 1L Competition
Activities:	Full-Time Extern, *Antitrust Bureau, New York State Attorney General* (Fall 2004); Intern, *Law Department, Port Authority of N.Y. and N.J.* (Summer 2004); Extern, *The Honorable John C. Rowley, Tompkins County Judge,* Ithaca (Fall 2003); Intern, *Office of the Judicial Administrator* (2003 – 2004); Research Assistant, *Cornell Law Library* (2003 – 2004); Phi Delta Phi, American Constitution Society, National Lawyers Guild, Discourses

University of Washington, Seattle, WA
Bachelor of Arts, *magna cum laude*, June 2002, Political Science (Political Economy Concentration)
Honors: Phi Beta Kappa, Annual Dean's List, Golden Key, Pi Sigma Alpha (Political Science), Agnes C. Nelson Scholarship (merit based)

Published Decisions and Notable Matters

Class Actions

- *Diallo v. Immediate Credit Recovery, Inc.*, No. 1:18-cv-00470-KAM-SJB (E.D.N.Y.) (pending final approval)
- *In re Midland Funding, LLC Interest Rate Litig.*, No. 11-cv-8149 (LMS), 2019 U.S. Dist. LEXIS 156255, at *1 (S.D.N.Y. Sep. 10, 2019)
- *Jeffries v. Volume Servs. Am.*, 928 F.3d 1059 (D.C. Cir. 2019)
- *Thomas v. Sherwin P. Robin & Associates, P.C.*, No. 1:16-cv-02529-AT-AJB (N.D. Ga. May 31, 2019), at Docket Entry No. 109 (Final Order and Judgment)
- *Daisley v. West Creek Financial, Inc.*, No. 1:18-cv-03555-BMC (S.D.N.Y. March 11, 2019), at Docket Entry No. 35 (Final Order and Judgment)
- *Winslow v. Forster & Garbus, LLP*, No. 18-116, 2018 U.S. App. LEXIS 37028, at *1 (2d Cir. Apr. 6, 2018)
- *Klippel v. Portfolio Recovery Associates LLC*, No. 6:15-cv-01061-MAD-TWD (N.D.N.Y. September 6, 2017), at Docket Entry No. 65 (Final Order and Judgment)

Consumer Protection

- *Green v. Capital One, N.A.*, No. 20 Civ. 4655 (ER), 2021 U.S. Dist. LEXIS 161837, at *1 (S.D.N.Y. Aug. 26, 2021)
- *Abdallah v. LexisNexis Risk Sols. Fl*, No. 19-CV-3609 (RRM) (VMS), 2021 U.S. Dist. LEXIS 62229 (E.D.N.Y. Mar. 30, 2021)
- *Hart v. Simon's Agency, Inc.*, No. 5:19-CV-00342 (NAM/ML), 2021 U.S. Dist. LEXIS 60512, at *1 (N.D.N.Y. Mar. 30, 2021)
- *Potente v. Barclays Bank Del.*, No. 19 CV 4050 (VB), 2020 U.S. Dist. LEXIS 97863, at *1 (S.D.N.Y. June 3, 2020)
- *Hart v. Equifax Info. Servs. LLC*, No. 5:19-cv-00342 (BKS/ML), 2019 U.S. Dist. LEXIS 167707, at *1 (N.D.N.Y. Sep. 30, 2019)
- *HSBC Bank USA v. Hoffman*, No. 59277/2018, 2019 N.Y. Misc. LEXIS 6193, at *1 (Sup. Ct., Westchester Cty. Sep. 30, 2019)
- *Levy v. Law Offices of J. Henry Nierman*, No. 17-cv-4022 (NSR), 2019 U.S. Dist. LEXIS 3807, at *1 (S.D.N.Y. Jan. 8, 2019)
- *Pyskaty v. Wide World of Cars, LLC*, No., 15 Civ. 1600 (JCM), 2019 U.S. Dist. LEXIS 30006, at *1 (S.D.N.Y. Feb. 25, 2019)
- *Avis Rent A Car Sys., LLC v. Scaramellino*, 161 A.D.3d 572, 78 N.Y.S.3d 11 (1st Dep't 2018)

- *Regan v. Equifax Information Services LLC*, No. 1:17-cv-06157-AT-GWG (S.D.N.Y. Jul. 30, 2018), at Docket Entry No. 98 (Oral Decision and Order Denying Motion to Dismiss)
- *Chestnut v. Whitehaven Income Fund I, LLC*, 2014 U.S. Dist. LEXIS 1198, at *1 (S.D.N.Y. Jan. 6, 2014)

Commercial Litigation

- *Hopkins v. Ackerman*, 2019 NY Slip Op 33282(U) (Sup. Ct., N.Y. Cty. 2019)
- *Caro v. Fid. Brokerage Serv.*, No. 3:14-CV-01028 (CSH), 2015 U.S. Dist. LEXIS 57116, at *1 (D. Conn. Apr. 30, 2015)
- *Flomenhaft v. Jacoby & Meyers, LLP*, 2014 NY Slip Op 07595, 122 A.D.3d 422, 996 N.Y.S.2d 27 (1st Dep't 2014)
- *Shelton v. Sethna*, 2012 U.S. Dist. LEXIS 42194, at *1 (S.D.N.Y. Mar. 26, 2012)
- *Schwarz v. Thinkstrategy Capital Mgmt. LLC*, 2012 U.S. Dist. LEXIS 134176, at *1 (S.D.N.Y. Sep. 18, 2012)
- *4Kids Entm't, Inc. v. Upper Deck Co.*, 2012 U.S. Dist. LEXIS 86286, at *1 (S.D.N.Y. June 21, 2012)
- *Singer v. Xipto Inc.*, 852 F. Supp. 2d 416 (S.D.N.Y. 2012)

ADMISSIONS: New York State; U.S. District Courts for the Southern, Eastern, and Northern Districts of New York.; U.S. Court of Appeals for the Second Circuit

AFFILIATIONS: New York City Bar Association, National Association of Consumer Advocates, New York Consumer Advocates Taskforce

RECOGNITION: Super Lawyers Rising Star for Consumer Law in Metro New York (2019-2021); Nominated as Planning Committee Member, *National Association of Consumer Advocates Spring Training 2022 Case Valuation and Damages Track Committee*; New York State Senate –Working Group Member/Panelist on the Consumer Credit Fairness Act (proposed 2020 New York legislation)

PRESENTATIONS: Speaker, *National Association of Consumer Advocates Spring Training 2021* (Presenter on Consumer Mediation); Faculty/Presenter, *Enforcing Money Claims Pre- & Post-Judgment: How to Really Win Your Case*, City Bar Center for CLE, November 2, 2011 (available online through West LegalEdcenter at http://westlegaledcenter.com)

Exhibit C

ARJUN SHAH

[redacted] [redacted]
[redacted] [redacted]

Litigation attorney admitted to practice in New York and New Jersey with nearly a decade of results-driven, diverse litigation experience throughout the federal and state courts of New York and New Jersey

EDUCATION

Emory University School of Law, Atlanta, GA
JD, May 2012

- GPA: 3.366
- Managing Editor, *Emory International Law Review*
- Dean's Award for Outstanding Achievement in Legal Writing, Research and Advocacy Program
- ABA/BNA Award for Excellence in the Study of Intellectual Property Law

Rutgers University, New Brunswick, NJ
BA, *cum laude*, Biological Sciences and Political Science, May 2009

PROFESSIONAL EXPERIENCE

Schlanger Law Group LLP, New York, NY
Associate, January 2021 - Present

- Representing consumers in individual and class actions against lenders, credit reporting agencies, debt collectors, auto dealers and warranty companies under a variety of federal consumer protection statutes including the Fair Credit Reporting Act, Fair Debt Collection Practices Act, Fair Credit Billing Act, Truth in Lending Act, Electronic Funds Transfer Act, as well as state law
- Preparing and drafting complaints and other pleadings, motions, briefs, discovery requests and responses, correspondence, mediation, and arbitration statements
- Conducting all aspects of discovery, including interrogatories, document production, and review
- Attending in-person and remote court hearings, successfully arguing motions before state and federal court judges in New York and New Jersey; attending settlement, mediation/arbitration and case management and discovery conferences
- Supervising paralegals and legal assistants

Herold Law, P.A., Warren, NJ
Associate, March 2017 – March 2020

- Worked as the firm's lead litigation associate and personally handled a diverse and voluminous case load in the areas of complex civil fraud, professional negligence and accounting malpractice, intellectual property and non-compete employment litigation, sales and use tax appeals, actions in lieu of prerogative writs, products liability, land use and redevelopment, environmental litigation, torts and defamation, contract and business disputes, trusts and estates, real estate, municipal criminal defense, and collection lawsuits on behalf of the firm for fees
- Represented objectors and applicants for land development before Planning and Zoning Boards across the State of New Jersey
- Drafted pleadings, motions, Orders to Show Cause, correspondence, mediation/arbitration statements and attorney opinion letters
- Successfully argued motions before state and federal court judges in New Jersey, attended settlement, mediation/arbitration and case management conferences and regularly appeared in court

Sherman Wells Sylvester & Stamelman LLP, Florham Park, NJ (formed by former partners of Riker Danzig)
Associate, July 2014 - October 2016

- Handled high volume caseload in diverse areas of law, including commercial and residential foreclosure and loan workouts, lender liability, creditors' rights in bankruptcy, real estate, construction defect,

insurance defense, personal injury, broker-dealer litigation and early dispute resolution, products liability, trusts and estates and land use

- Successfully argued dispositive motions on behalf of large corporations and banks in state and federal courts of New Jersey; led negotiations in mediations and settlement conferences
- Conducted all aspects of discovery and drafted pleadings and motions in state and federal courts of New Jersey and New York and other jurisdictions, including dispositive motions, discovery-related motions, foreclosure related motions and bankruptcy motions

Riker Danzig Scherer Hyland & Perretti LLP, Morristown, NJ
Associate, October 2012 - July 2014

- Experience overlaps with Sherman Wells Sylvester & Stamelman LLP as Sherman Wells was formed by former partners of Riker Danzig. Significant writing experience included drafting appellate briefs before New Jersey Appellate Division in complex land use and construction defect cases

Supreme Court of Georgia, The Honorable Justice P. Harris Hines, Atlanta, GA
Judicial Intern, January 2012 - April 2012

- Prepared bench memoranda on a variety of civil and criminal cases; wrote recommendations for applications for discretionary and interlocutory appeals; drafted Court opinion

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BAR ADMISSIONS
New York
New Jersey
United States District Court for the Southern and Eastern Districts of New York
United States District Court for the District of New Jersey
United States Patent and Trademark Office

ISAAC M. TAUBES

[redacted]

BAR STATUS
Admitted to the New York State Bar (2020).

EDUCATION
Benjamin N. Cardozo School of Law, New York, NY
Juris Doctor, May 2019
Honors: International Comparative, Policy, & Ethics Law Review

Yeshiva College, New York, NY
Bachelor of Arts in Psychology, January 2015

EXPERIENCE
William Schwitzer & Associates, New York, NY
Associate, December 2019 – March 2020
Served as primary point of contact for over 50 clients. Made regular court appearances and engaged with opposing counsel at conferences. Drafted discovery demands and responses. Drafted court documents and motions, including motions for summary judgement and oppositions. Worked closely with other attorneys in preparation for trial including analyzing deposition transcripts and reviewing evidence.

Federal Public Defender's Office, Newark, NJ
Volunteer Law Clerk, November 2019
Researched Federal sentencing guidelines and the possible effects of adverse childhood experiences on criminal sentencing. Worked with attorneys in pretrial preparation and researched case law relating to the Federal Firearms Act.

United Nations, New York, NY
Security Council Practices and Charter Research Division Intern, Summer – Fall 2018
Worked on drafting the official UN publication: *The Repertoire of the Practice of the Security Council*. Researched treaties and drafted memoranda and reports on State interpretation of the UN Charter. Drafted case studies on Council members' interpretation of UN Charter Article 2(4) as it relates to international law. Worked with supervising attorney in drafting the primary report on the Council agenda item: *The Situation in the Middle East.* Attended Security Council meetings and assisted in answering Council members' queries regarding procedural rules of the Council.

Jan Meyer and Associates, Teaneck, NJ
Law Clerk, June – August 2017
Researched case law and drafted memoranda on a variety of areas including insurance, tort, real estate, contract, and property law. Drafted complaints and engaged with other attorneys in discovery and evidence gathering in preparation for trial. Drafted portions of legal briefs used in oral argument.

Black Diamond Labs, New York, NY
Legal Intern, May – June 2017
Drafted privacy policy and terms of use for company app. Worked with the legal department in ensuring multiple sclerosis symptom tracking app complied with Federal HIPAA regulations. Drafted memoranda explaining medical privacy requirements to non-legal staff.

INTERESTS
International Humanitarian Law, Political Affairs, Technology

[Current as of Spring 2020]

Exhibit D

Jaclyn P. Osterlof

[redacted]

Work Experience

Schlanger Law Group, LLP
Paralegal, April 2021-Present

- Assisting firm wide team with daily tasks, including drafting litigation documents, fielding phone calls from clients, opposing counsel and the courts, and maintaining firm wide calendar

Susman Godfrey LLP, New York, New York
Legal Assistant, February 2018-March 2021

- Provide administrative and legal support to multiple attorneys specializing in commercial litigation
- Prepare, proofread and finalize documents, including motion papers, memorandums and correspondence
- Correspond daily with clients and courts
- Maintain calendar appointments, deadlines, depositions and meetings
- Track and enter all time and billable hours in Aderant
- Prepare and submit all expenses

Dechert LLP, New York, New York
Legal Assistant, March 2015 – February 2018

- Provided legal and administrative support to the Managing Partner of the New York Office and the Co-Chairman of the Complex Commercial Litigation practice group
- Created, managed and maintained paper and electronic files
- Maintained calendar appointments, deadlines, depositions and meetings, including coordinating all aspects of the same
- Tracked and entered all time and billable hours into Carpe Diem
- Coordinated domestic and international travel
- Prepared and submitted all expenses

Krovatin Klingeman LLC, Newark, New Jersey
Legal Assistant, May 2013 – March 2015

- Provided daily administrative, legal and word processing support to four (4) attorneys specializing in complex white collar criminal defense and civil litigation matters
- Prepared, proofread, and finalized documents such as motion papers, memorandums and correspondence
- Created, managed and maintained paper and electronic filing systems
- Calendar management of appointments, deadlines, depositions and meetings
- Track and entered all time and billable hours into PCLaw

Let It Grow, Inc., River Edge, New Jersey
Part-time Administrative Assistant (During H.S. & College), June 2005 – August 2012

- Supported multiple managers and owner of Landscape Architect Co.
- Greeted visitors, answered telephones and connected clients with office personnel as needed
- Created Excel payroll spreadsheets for records keeping and payroll tracking
- Set up and maintained filing systems for account records, correspondence and invoices
- Maintained calendars for employee work schedules, bid meetings and Company events

Education

Bergen Community College, Paramus, New Jersey
Associate in Applied Science Degree in Legal Studies, September 2010 – December 2014

Rowan University, Glassboro, New Jersey
Completed General Education Coursework, August 2008 – May 2009

Skills

Proficient with Microsoft Word, Excel, PowerPoint and Outlook; iManage; Adobe; ChromeRiver; Aderant; Zoom; Clio; SharePoint; Basic training in Westlaw and LexisNexis; Types 60 WPM

Alan Frazin

[redacted]

Education

Tel Hai Academic College, Kiryat Shmoneh, Israel - 2015 – 2016
Foundations of Programming (C language) and Object-Oriented Programming (C#)

Oreilly School of Technology - 2014 – 2015
Database Administration
MySQL, Talend, Mondrian MDX

Hebrew University of Jerusalem, Jerusalem, Israel – 1999-2002
M.A. Middle Eastern Studies

Arizona State University, Tempe, AZ – 1988-1993
B.S. Psychology
B.A. Business Management

Professional Experience

Paralegal, *Schlanger Law Group LLP*
2017 - present

- Responsible for Intakes, first point of contact for potential clients.
- Prepared court documents and correspondence to clients, lawyers and the court.
- Office management including supplies, new IT integration and file management.

Computer Programmer, *Barracuda Media, Katzrin, Israel*
2016 - 2016

- Programmed backend and frontend APIs in NodeJS with some Sencha UI interfaces.

E-Commerce Consultant
2014 - present

- Design and implement independent E-Commerce websites using WordPress
- Advise small E-Commerce companies on SEO best practices and improve website's SEO ratings

Chief Information Officer / Technical Support / VIP Account Manager, *Tail of the Lion, Bloomfield, CT*
2006-2015

- Managed databases and servers on shared-server, dedicated, Magento, Amazon webstore, eBay, and ShopScripts platforms and managed data migration
- Wrote and implemented server scripts in Linux environment
- Managed the project to upgrade the on-site search engine
- Researched and implemented technical SEO requirements
- Developed new sales channels (eBay, Amazon)
- Supported customers pre- and post-sales, developed B2C and B2B relationships
- Creatively resolved issues with VIP accounts
- Developed strategies for customer retention and attracting new VIP accounts

Technical Advisor and Database Manager, *Steven Spielberg Jewish Film Archive*, *Jerusalem, Israel*
2001-2004

- Managed database of multi-media, film-related material
- Advised and supported digitization of over 200 films in the collection

LINDA SOZA

Email: [redacted] Cell: [redacted]

RELEVANT EXPERIENCE

Schlanger Law Group LLP (Consumer Protection Law Firm) June 2020 – Present

Litigation Paralegal

- Perform legal research
- Train new paralegals and newly appointed attorneys on office protocol
- Conduct client intakes, gather documents, and prepare a summary for attorney review
- Draft and file various legal documents through the NYSCEF and PACER systems

Harlan York & Associates (Immigration Law Firm) June 2018 – June 2020

Senior Paralegal

- Perform legal research
- Drafting and revising legal documents including, affidavits, motions, complaints, immigration forms, and various other litigation court packages
- Conducting client interviews and preparing them for their upcoming interviews/hearings
- Manage various cases simultaneously while maintaining strict deadlines
- Train new paralegals, legal assistants, and newly appointed attorneys
- Actively update the attorneys and paralegals with the latest procedures and requirements for various sub-divisions of immigration based government agencies (such as the National Visa Center and USCIS) whilst actively training them with use of said agencies online tools
- Create templates for various office procedures, such as questionnaires for the clients, and court packages

Youman, Madeo, & Fasano LLP (Immigration Law Firm) May 2017 – June 2018

Paralegal

- Performed legal research
- Drafted and revised legal documents including, affidavits, motions, complaints, immigration forms, and various other litigation court packages whilst actively translating documents to be used in support of client's case
- Conducted client interviews and preparing them for their upcoming interviews/hearings
- Manage/take the lead on various cases simultaneously whilst tracking the state of the client's account with the firm

Rafael Figueroa, P.C. (Litigation, Real Estate, Family, Municipal, & Immigration Law Firm) September 2014 – April 2017

Paralegal

- Managed the office and carried out administrative tasks such as filing, scheduling interviews and consultations, answering simple immigration law related questions, organizing and maintaining files along with the head lawyer's schedule, as well as answering high volume calls
- Performed legal research
- Intake new clients after an attorney had screened and verified their eligibility to move forward with a specific type of case
- Drafted and revised legal documents including, affidavits, motions, complaints, immigration forms, and various other litigation court packages whilst actively translating documents to be used in support of client's case
- Conducting client interviews and preparing them for their upcoming interviews/hearings
- Managed/took the lead on various cases simultaneously whilst tracking the state of the client's account with the firm
- Trained new paralegals

Hudson Pharmacy – Jersey City, NJ August 2008 - September 2014

Pharmaceutical Technician

- Assisted in the dispensing of medication to patients as well as informed the patients of any and all possible side effects the medication may have; also facilitated translation between the pharmacist and non-English speaking clients by translating
- Monitor inventory and totaled the days sales
- Trained new employees

CERTIFICATIONS/SKILLS

- Bilingual: English/Spanish; advanced knowledge of the English and Spanish language
- Skills: Proficient in Microsoft Word, Microsoft Access, Outlook, Excel, LawLogix, Time Matters, Allstate Legal, Lolly Law, SPSS, litigation, legal writing, research, management, employee training, on-call-support and much more

EDUCATION

Rutgers, The State University, School of Arts and Sciences – Newark, NJ

Graduated with a Bachelor of Arts in Psychology May 2014

Exhibit E

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
3/17/2020	Daniel A. Schlanger	1.6	Research	Reviewing Livewatch agreement and fact write up of the case. .6; Research regarding various defendant entities. .4; Email to Beth Terrell with legal analysis. .6
3/18/2020	Daniel A. Schlanger	0.2	Confer	Confer with Evan Rothfarb re facts of case
5/11/2020	Daniel A. Schlanger	0.1	Review	Reviewing email thread and email to co-counsel re status of mediation effort
5/19/2020	Daniel A. Schlanger	2	Edit/Revise	Revise complaint and send to client. 1.5 hr.; Review client input and revise complaint accordingly. .5
5/20/2020	Daniel A. Schlanger	0.9	Draft	Email to client re finalization of complaint. .1; Finalize draft complaint. .5; Confer with Evan Rothfarb re pleading issues (class definition, causes of action, etc.). .2; Email to co-counsel re same. .1
5/22/2020	Daniel A. Schlanger	0.3	Review	Review underlying contract and email to co-counsel re relevant facts
5/27/2020	Daniel A. Schlanger	0.4	Research	Researching legal issues and email to co-counsel re same
5/28/2020	Daniel A. Schlanger	0.3	Confer	Email with client providing status update. .2; Email to co-counsel re finalizing complaint. .1
6/1/2020	Daniel A. Schlanger	0.2	Edit/Revise	Continued edits to complaint
6/2/2020	Daniel A. Schlanger	1.1	Edit/Revise	Continued edits to complaint and tasking paralegal with minor changes. .6; Email to client for approval of file ready complaint. .2; Revising ancillary documents (civil cover, summonses). .3
6/3/2020	Daniel A. Schlanger	2	Edit/Revise	Final edits to complaint and supporting documents. 1 hr.; Case opening and initial filing. .8; Task associate attorney with drafting rule 26 disclosure, protective order, document requests and interrogatories. .2
6/4/2020	Daniel A. Schlanger	0.2	Review	Review initial ECF docs and task paralegal with service of summons. .1; Email to associate attorney re drafting rule 26 disclosure. .1
6/15/2020	Daniel A. Schlanger	1	Supervise	Supervising paralegal with regard to RPDs, ROGs and initial disclosures and revising same.
6/16/2020	Daniel A. Schlanger	0.4	Edit/Revise	Revise associate attorney drafted first interrogatories and confer with Isaac Taubes re. his draft
6/17/2020	Daniel A. Schlanger	0.1	Supervise	Supervise paralegal re filing of affidavits of service
6/17/2020	Daniel A. Schlanger	0.1	Email Related	Emails with co-counsel re. change in defendant policy in response to suit
6/29/2020	Daniel A. Schlanger	0.1	Email Related	Emails with Evan Rothfarb re. opposing counsel request for extension
7/7/2020	Daniel A. Schlanger	0.1	Review	Review email notice to client re. [factual and legal issues in case - redacted for privilege] and email co-counsels
7/8/2020	Daniel A. Schlanger	0.4	Teleconference	Teams call with co-counsel re. recent developments in case [redacted for privilege]; and issues presented by the same

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
7/8/2020	Daniel A. Schlanger	0.1	Email Related	Email with Evan Rothfarb re setting up settlement call with opposing counsel
7/10/2020	Daniel A. Schlanger	0.1	Email Related	Emails with Evan Rothfarb re upcoming settlement call with opposing counsel.
7/14/2020	Daniel A. Schlanger	0.1	Email Related	Emails with opposing counsel re tomorrow's conference call and brief call with Beth Terrel re same.
7/15/2020	Daniel A. Schlanger	0.4	Teleconference	Settlement call with all counsel
7/15/2020	Daniel A. Schlanger	0.1	Email Related	Emails with co-counsel re. settlement issues
7/24/2020	Daniel A. Schlanger	0.3	Settlement/Negotiation Related	Review opposing counsel email re status and interest in settlement and confer with co-counsel re same
7/27/2020	Daniel A. Schlanger	0.2	Confer	Confer with Beth Terrell re [case strategy - redacted for privilege]
7/31/2020	Daniel A. Schlanger	0.4	Settlement/Negotiation Related	Email to co-counsel regarding judges assigned to case. .1; Brief call with co-counsel regarding settlement. .3
8/10/2020	Daniel A. Schlanger	0.1	Email Related	Reviewing email thread and email to co-counsel re status of mediation effort
8/18/2020	Daniel A. Schlanger	0.2	Email Related	Emails with Beth Terrell and Evan Rothfarb re potential mediators
8/19/2020	Daniel A. Schlanger	0.2	Email Related	Emails with opposing counsel and co-counsel re mediation and settlement
8/20/2020	Daniel A. Schlanger	0.2	Confer	Confer with Beth Terrell re mediation and review multiple emails re same
8/26/2020	Daniel A. Schlanger	0.4	Teleconference	Call with Beth Terrell re issues in case, settlement and mediation
8/27/2020	Daniel A. Schlanger	0.1	Email Related	Email to Beth Terrell re class size and facts of case and review response
8/31/2020	Daniel A. Schlanger	0.1	Email Related	Email exchange with co-counsel re approach to getting better class information for purposes of settlement.
9/1/2020	Daniel A. Schlanger	0.3	Email Related	Emails with co-counsel regarding early discovery for settlement
9/11/2020	Daniel A. Schlanger	0.2	Prepare	Prepare for rule 26f call
9/11/2020	Daniel A. Schlanger	0.6	Court Related	Attending rule 26f telephone conference to discuss discovery and settlement and underlying claims and defenses.
9/14/2020	Daniel A. Schlanger	0.3	Draft	Drafting discovery plan and emails with paralegal and co-counsel re same
9/14/2020	Daniel A. Schlanger	0.3	Draft	Drafting and revising joint letter to court re discovery, settlement, etc.
9/15/2020	Daniel A. Schlanger	0.1	Email Related	Emails with co-counsel re discovery schedule issues
9/16/2020	Daniel A. Schlanger	0.3	Edit/Revise	Revise discovery schedule and joint letter and forward to opposing counsel for review
9/16/2020	Daniel A. Schlanger	0.1	Email Related	Emails with co-counsel re discovery scheduling issues and letter.
9/18/2020	Daniel A. Schlanger	0.1	Confer	Email to opposing counsel re status of joint letter and schedule
9/22/2020	Daniel A. Schlanger	0.2	Review	Review emails re discovery and settlement conference and confer with co-counsel re discovery schedule.
9/25/2020	Daniel A. Schlanger	0.3	Edit/Revise	Revise discovery schedule and annotate same

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
9/25/2020	Daniel A. Schlanger	0.2	Edit/Revise	Email to co-counsel re same
9/25/2020	Daniel A. Schlanger	0.2	Edit/Revise	Email to opposing counsel re same
9/29/2020	Daniel A. Schlanger	0.1	Email Related	Email to opposing counsel re status of revised stip
9/30/2020	Daniel A. Schlanger	0.1	Email Related	Email with opposing counsel re status of discovery schedule.
10/2/2020	Daniel A. Schlanger	0.3	Edit/Revise	Revise joint letter to court and proposed case schedule
10/6/2020	Daniel A. Schlanger	0.5	Document Production Related	Emails with co-counsel re initial disclosure and attach draft. .2; Review revised draft, and provide feedback on same. .2; Emails with opposing counsel re initial disclosure. .1
10/7/2020	Daniel A. Schlanger	0.4	Research	Review Magistrate Judge's individual rules re tiered discovery and email co-counsel with strategy in light of same
10/15/2020	Daniel A. Schlanger	0.5	Review	Email with co-counsel re tier 1 discovery request letter. .1; Review co-counsel draft letter; edit and sign off. .2; Reviewing file in connection with Tier 1 discovery, and call with Beth Terrell re same. .2
10/22/2020	Daniel A. Schlanger	0.1	Confer	Email to opposing counsels re status of Tier 1 discovery and review response
10/26/2020	Daniel A. Schlanger	0.1	Confer	Emails with co-counsel and review emails to opposing counsel re getting Tier 1 discovery
10/30/2020	Daniel A. Schlanger	0.2	Confer	Email to co-counsel with feedback/strategy re amendment
11/2/2020	Daniel A. Schlanger	0.2	Confer	Review co-counsel email re discovery and amendment and respond re same
11/3/2020	Daniel A. Schlanger	0.6	Confer	Email with co-counsel re discovery strategy, settlement, etc. .4; Email to opposing counsel re amendment. .2
11/5/2020	Daniel A. Schlanger	0.6	Confer	Emails with opposing counsel and co-counsel re motion to amend. .3; Pulling template motion to amend from prior EDNY case and sending it to co-counsel with comments. .3
11/5/2020	Daniel A. Schlanger	0.9	Research	Review co-counsel emails re discovery and settlement and amendment and respond throughout day. .5; Review opposing counsel response to email re amendment and email co-counsel with thoughts on same. .1; Pull prior EDNY Rule 15 brief and forward to co-counsel with thoughts on adapting to our case. .3
11/9/2020	Daniel A. Schlanger	0.7	Edit/Revise	Revising First Amended Complaint. .6; Email to co-counsel re same. .1
11/12/2020	Daniel A. Schlanger	1	Settlement/Negotiation Related	Review motion to amend docs. .3; Email with client re upcoming settlement conference and settlement statement and outlining strategy. .4; Revise pre-settlement conference letter. .3
11/16/2020	Daniel A. Schlanger	0.4	Settlement/Negotiation Related	Review opposing counsel settlement response and re First Amended Complaint and emails with co-counsel's re next steps

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
11/18/2020	Daniel A. Schlanger	2.4	Settlement/Negotiation Related	Prepare for settlement conference. 1.1 hr.; Call with co-counsel and client prior to conference. .2; Attend settlement conference. .9; Call with co-counsel and client after conference. .2
12/3/2020	Daniel A. Schlanger	0.2	Confer	Emails with co-counsel re filing of amended complaint
12/4/2020	Daniel A. Schlanger	0.3	Edit/Revise	Review and revise pre-motion letter
12/11/2020	Daniel A. Schlanger	0.3	Review	Review Defendants' premotion opposition letter to motion to amend
12/17/2020	Daniel A. Schlanger	0.3	Confer	Email with Beth Terrell and Ben Drachler re discovery issues, Tier 1 discovery requests, premotion opposition letter. etc.
12/20/2020	Daniel A. Schlanger	0.2	Review	Review Tier 1 draft discovery and email co-counsel with question re same
12/21/2020	Daniel A. Schlanger	0.4	Document Production Related	Revising Tier 1 discovery
12/28/2020	Daniel A. Schlanger	0.1	Confer	Emails with co-counsel and opposing counsel re briefing schedule and review of proposed letter
1/15/2021	Daniel A. Schlanger	1.3	Edit/Revise	Review first amended complaint and email co-counsel with question re same. .1; Revise motion to amend brief. .9 hrs.; Revise first amended complaint. .3
1/20/2021	Daniel A. Schlanger	0.1	Document Production Related	Review defendant's discovery responses
1/21/2021	Daniel A. Schlanger	0.6	Document Production Related	Review opposing counsel supplemental production and letter re settlement and discovery. .4; Tasking paralegal with discovery data review. .2
1/25/2021	Daniel A. Schlanger	0.1	Document Production Related	Email with co-counsel re defendant's discovery production
1/26/2021	Daniel A. Schlanger	0.8	Edit/Revise	Revising meet and confer letter. .6; Emails to co-counsel re same. .2
1/28/2021	Daniel A. Schlanger	0.1	Review	Review emails from co-counsel re upcoming meet and confer
1/30/2021	Daniel A. Schlanger	0.2	Review	Review opposing counsel email re not filing opposition to motion to amend and email co-counsel re same
2/2/2021	Daniel A. Schlanger	1.3	Meeting	Attend meet and confer call regarding discovery deficiencies. 1.1 hrs.; Call with Beth Terrell re rest of call (I had to leave after an hour). .2
2/3/2021	Daniel A. Schlanger	0.6	Document Production Related	Review letter to opposing counsel re discovery and email to co-counsel re same. .2; Review and revise reply brief and brief email to co-counsel re revision. .4
2/4/2021	Daniel A. Schlanger	0.4	Review	Review and edit joint letter and email co-counsel re same. .2; Review and edit reply brief re unopposed motion and email co-counsel re same. .2
2/5/2021	Daniel A. Schlanger	0.2	Review	Review and approve motion to amend and all supporting docs

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
2/24/2021	Daniel A. Schlanger	0.1	Confer	Email to co-counsel re discovery dispute
2/26/2021	Daniel A. Schlanger	0.2	Confer	Email to co-counsel re re upcoming discovery fight
3/3/2021	Daniel A. Schlanger	0.1	Confer	Email to co-counsel re internal discovery call
3/8/2021	Daniel A. Schlanger	0.5	Edit/Revise	Revising joint letter, conferring with opposing counsel re same and filing via ECF. .3; Emails to co-counsel and Arjun Shah re joint letter and discovery and confer with Arjun re same. .2
3/15/2021	Daniel A. Schlanger	0.1	Review	Review case file re discovery dispute schedule
3/18/2021	Daniel A. Schlanger	0.2	Confer	Emails with co-counsel re edits to ESI protocol and re joint letter and confer with Arjun re discovery issues related to joint letter
3/19/2021	Daniel A. Schlanger	0.1	Confer	Email with support staff re filing logistics
3/30/2021	Daniel A. Schlanger	0.3	Document Production Related	Review Arjun Shah email re data issues with defendant’s production and respond to same and email exchange with co-counsel re same and options going forward
4/1/2021	Daniel A. Schlanger	2.2	Meeting	Prepare for status conference, including review of pleadings, discovery letters, clarification of various outstanding discovery issues with co-counsel, etc. 2 hrs.; Status conference with Court regarding discovery. .2
4/1/2021	Daniel A. Schlanger	0.7	Document Production Related	Email to co-counsel with synopsis of conference. .2; Review and comment on proposed hitlist/ESI search terms. .2; Confer with Arjun Shah re ESI issues. .3
4/2/2021	Daniel A. Schlanger	0.4	Document Production Related	Email with Ben Drachler re ESI issues, witness issues and Tier 2 discovery
4/8/2021	Daniel A. Schlanger	0.7	Document Production Related	Call with opposing counsel re ESI. .3; Review ESI disclosures and approve. .1; Call with co-counsel re ESI issues. .3
4/13/2021	Daniel A. Schlanger	0.3	Confer	Confer with co-counsel re defendant's apparent failure to save correspondence sent to all class members or claim that it doesn't have the data and that its vendor doesn't either.
4/13/2021	Daniel A. Schlanger	0.4	Research	Online research re relevant vendor/software and email findings to co-counsel.
4/16/2021	Daniel A. Schlanger	0.4	Review	Review Arjun Shah email and confer with him re defendant's failure/refusal to produce emails as ordered by court.
4/22/2021	Daniel A. Schlanger	0.4	Confer	Confer with co-counsel via email and Arjun Shah in person re extensions, discovery disputes, CMP, etc.
4/22/2021	Daniel A. Schlanger	0.2	Edit/Revise	Revise and file joint status letter.
4/26/2021	Daniel A. Schlanger	0.2	Email Related	Emails with co-counsel re discovery issues, including review of proposed letter to the court.

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
4/26/2021	Daniel A. Schlanger	0.1	Confer	Confer with Arjun Shah re same.
4/29/2021	Daniel A. Schlanger	1.8	Edit/Revise	Revise motion to compel letter to court. 1.5; Email to co-counsel summarizing edits. .2; Emails with co-counsel re sealing exhibits. .1
4/30/2021	Daniel A. Schlanger	0.4	Review	Review ECF Order on motion to compel and confer with co-counsel re same
5/19/2021	Daniel A. Schlanger	0.1	Review	Reviewing letter to opposing counsel and email to co-counsel re same.
6/23/2021	Daniel A. Schlanger	1.5	Settlement/Negotiation Related	Revise detailed settlement proposal
6/24/2021	Daniel A. Schlanger	0.5	Settlement/Negotiation Related	Finalize settlement letter. .2; Emails with co-counsel re revisions to discovery requests. .3
7/6/2021	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Review opposing counsel settlement counter and email with co-counsel re same
7/9/2021	Daniel A. Schlanger	0.3	Settlement/Negotiation Related	Email with co-counsel re settlement/mediation and review mediator bio in connection with same
7/12/2021	Daniel A. Schlanger	0.8	Settlement/Negotiation Related	Email to mediator re availability. .2; Call with Beth re mediation. .2; Email to co-counsel re opposing counsel request for extension, mediation, and related issues. .2; Video conference with co-counsel re same. .2
7/13/2021	Daniel A. Schlanger	0.1	Review	Review mediator response email
7/15/2021	Daniel A. Schlanger	0.4	Confer	Email to opposing counsel re mediation and potential mediator. .3; Email to mediator re same. .1
7/15/2021	Daniel A. Schlanger	0.5	Document Production Related	Review opposing counsel email re nationwide data production, call with opposing counsel and email to co-counsel summarizing same (all re mediation and discovery).
7/20/2021	Daniel A. Schlanger	0.8	Draft	Draft letter to court re partial stay of discovery, revise and send to opposing counsel for comment
7/22/2021	Daniel A. Schlanger	0.2	Review	Review opposing counsel email re joint letter and re alternative mediators
7/22/2021	Daniel A. Schlanger	0.9	Confer	Detailed email update to client regarding status of settlement and seeking input on Defendant’s settlement counter. .8 hrs.; Review client's response. .1
7/23/2021	Daniel A. Schlanger	1.1	Research	Researching list of 6 proposed mediators and email to co-counsel with assessment. 1 hr.; Email to opposing counsel re mediator selection. .1
7/27/2021	Daniel A. Schlanger	0.1	Confer	Email to co-counsel re mediation
8/4/2021	Daniel A. Schlanger	0.5	Research	Researching mediators and email to opposing counsel re mediator references
8/4/2021	Daniel A. Schlanger	0.1	Confer	Email to opposing counsel re mediator selection

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
8/5/2021	Daniel A. Schlanger	0.5	Research	Working on setting up mediation, researching mediators, emails with opposing counsel and co-counsel re same
8/10/2021	Daniel A. Schlanger	1.4	Research	Calling plaintiff-side references for proposed mediator and discussing their experiences with him. .7; Email with co-counsel re mediator selection and settlement. .3; Email to opposing counsel re selection of mediator. .1; Draft email to mediator and circulate to opposing counsel for approval, review response and send to mediator. .3
8/11/2021	Daniel A. Schlanger	0.2	Confer	Email with opposing counsel re alternative mediators and email to Mr. Byrne
8/12/2021	Daniel A. Schlanger	0.2	Confer	Emails with Byrne and his staff re mediation. .1; Email to co-counsel re scheduling issues. .1
8/16/2021	Daniel A. Schlanger	0.7	Confer	Email with opposing counsel re mediation date. .1; Emails with Byrne's office confirming mediation and re logistics .2; Email with Arjun Shah and Ben Drachler re discovery compliance. .1; Email with client re mediation and related issues. .3
8/18/2021	Daniel A. Schlanger	0.5	Edit/Revise	Revise letter to court regarding mediation and email to opposing counsel re same
8/19/2021	Daniel A. Schlanger	0.1	Confer	Email with opposing counsel re joint letter
8/20/2021	Daniel A. Schlanger	0.2	Review	Review and execute NAM agreement and email with NAM re same
9/24/2021	Daniel A. Schlanger	2.6	Edit/Revise	Revisions to premediation statement. 1.8 hrs.; Long email to Beth Terrell with thoughts re same and outstanding questions. .5; Tasking paralegal with exhibits to mediation statement and review pdf portfolio of exhibits. .3
9/29/2021	Daniel A. Schlanger	0.1	Confer	Email to Byrne's assistant re submission
9/30/2021	Daniel A. Schlanger	0.1	Confer	Email with client re mediation
9/30/2021	Daniel A. Schlanger	9.4	Meeting	Confer with client prior to mediation. .3; Confer with co-counsel re mediation. .3; Prepare for mediation including preparing opening statement, outline of issues, etc. 1.3 hrs.; Attending mediation. 6.8 hrs.; Confer with co-counsel after mediation. .3; Email to class administrator outlining settlement and notice parameters. .4
10/1/2021	Daniel A. Schlanger	0.7	Settlement/Negotiation Related	Revisions to settlement term sheet. .5; Email to co-counsel re same and re drafting settlement docs. .2
10/4/2021	Daniel A. Schlanger	1	Settlement/Negotiation Related	Review opposing counsel edits to term sheet and email to co-counsel re same with assessment and questions. .4; Emails with co-counsel re data relevant to term sheet issues and assessing competing methodologies. .5; Email to opposing counsel re same. .1
10/5/2021	Daniel A. Schlanger	0.5	Edit/Revise	Revisions to status letter to the court. .4; Emails with opposing counsel re same. .1

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
10/7/2021	Daniel A. Schlanger	0.6	Document Production Related	Working through data/class list issue with co-counsel and detailed email re same
10/11/2021	Daniel A. Schlanger	0.2	Review	Review and revised proposed letter to opposing counsel re data/class list issues
10/13/2021	Daniel A. Schlanger	0.1	Confer	Email with co-counsel re data/class list issue
10/14/2021	Daniel A. Schlanger	0.7	Settlement/Negotiation Related	finalization of term sheet and related data/class list issues including calls and emails with co-counsel and mediator and circulation of final sheet for execution
10/16/2021	Daniel A. Schlanger	0.1	Settlement/Negotiation Related	Review executed term sheet
11/12/2021	Daniel A. Schlanger	3.2	Settlement/Negotiation Related	Drafting settlement agreement. 2.7 hrs.; Email to co-counsel listing outstanding questions. .5
11/14/2021	Daniel A. Schlanger	0.1	Settlement/Negotiation Related	Email with co-counsel re outstanding settlement language issues
11/15/2021	Daniel A. Schlanger	0.1	Confer	Email with co-counsel re cy pres
11/17/2021	Daniel A. Schlanger	0.7	Settlement/Negotiation Related	Review co-counsel Settlement Agreement edits and email feedback on same and re extension. .4; Draft letter to court re extension. .3
11/18/2021	Daniel A. Schlanger	1.2	Settlement/Negotiation Related	Email with co-counsel re settlement distribution details. .2; Revise settlement agreement language to deal with certain outstanding issue. .3; Finalize Settlement Agreement draft and email to opposing counsel with cover note re extension. .4; Review response, revise letter to court and send to opposing counsel for approval. .3
11/30/2021	Daniel A. Schlanger	0.9	Settlement/Negotiation Related	Review and revise proposed notices and orders
12/7/2021	Daniel A. Schlanger	1	Settlement/Negotiation Related	Confer with opposing counsel re CAFA issue, confer with co-counsel re same, email to class administrator re same
12/8/2021	Daniel A. Schlanger	0.5	Settlement/Negotiation Related	Additional line edits to Settlement Agreement
12/9/2021	Daniel A. Schlanger	0.3	Settlement/Negotiation Related	Call with opposing counsel re Settlement Agreement issues
12/13/2021	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Emails with paralegal and then co-counsel re nits to notices and website
12/14/2021	Daniel A. Schlanger	0.7	Settlement/Negotiation Related	Email with co-counsel re finalization of all settlement materials. .1; Revising Settlement Agreement and email to co-counsel re same and extension. .6

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
12/28/2021	Daniel A. Schlanger	0.7	Settlement/Negotiation Related	Final edits to notices and orders. .3; Final edits to Settlement Agreement. .4
1/3/2022	Daniel A. Schlanger	1	Settlement/Negotiation Related	Confer with co-counsel re finalization of Settlement Agreement and class list issues and emailopposing counselre same. .5; Review opposing counsel response and email to Terrell Marshall Law Group with thoughts on how to finalize and then respond to opposing counsel. .5
1/4/2022	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Emails with co-counsel re Settlement Agreement edits and finalization
1/5/2022	Daniel A. Schlanger	0.3	Settlement/Negotiation Related	Revising and circulating settlement documents for signature
1/5/2022	Daniel A. Schlanger	0.5	Settlement/Negotiation Related	Review opposing counsel email re new proposed terms and email and confer by phone with co-counsel re same. .3; Emails with opposing counsel re various settlement finalization issues. .2
1/6/2022	Daniel A. Schlanger	0.2	Confer	Call with Adrienne McEntee re wrapping up preliminary approval motion, edits, etc
1/7/2022	Daniel A. Schlanger	1.7	Edit/Revise	Review and revise notice of motion and supporting brief. 1.5 hrs.; Email to co-counsel re declarations and other to-dos. .2
1/10/2022	Daniel A. Schlanger	1.5	Edit/Revise	Reviewing and editing my draft declaration. 1.2 hrs.; Emails with co-counsel re defamation issue. .3
1/10/2022	Daniel A. Schlanger	1	Settlement/Negotiation Related	Call with co-counsel and then with co-counsel and opposing counsel regarding preliminary approval filing and lack of signed Settlement Agreement. .5; Draft and revise letter to the court re same. .4; Review fully executed Settlement Agreement once received.1
1/11/2022	Daniel A. Schlanger	1.2	Settlement/Negotiation Related	Final review and edits to preliminary approval brief and ancillary documents. .7; Emails with co-counsel re my revised declaration. .2; Emails with co-counsel with my comments re same and alternative language. .3
1/13/2022	Daniel A. Schlanger	0.2	Review	Review preliminary approval order issued by court
1/16/2022	Daniel A. Schlanger	0.1	Settlement/Negotiation Related	Email to class administrator with status update after review of preliminary approval ECF notice
1/18/2022	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Emails with class administrator re settlement logistics
2/1/2022	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Review settlement administrator proposal and email to co-counsel re same

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
2/2/2022	Daniel A. Schlanger	0.2	Confer	Email to class administrator re CAFA notice issue. .1; Email to class administrator re revised estimate. .1
2/4/2022	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Final review and execution of settlement administrator contract
2/15/2022	Daniel A. Schlanger	0.2	Settlement/Negotiation Related	Email to opposing counsel re CAFA notice issue. .1; Emails with class administrator re settlement logistics issues. .1
3/7/2022	Daniel A. Schlanger	0.5	Settlement/Negotiation Related	Conferring with Arjun Shah re his review of notices to class and email class administrator re same. .3; Review opposing counsel's other proposed corrections. .1; Email to owner of class administrator re same. .1
4/19/2022	Daniel A. Schlanger	0.8	Settlement/Negotiation Related	Revisions to Memorandum of Law and Notice of Motion re fees
4/20/2022	Daniel A. Schlanger	0.4	Settlement/Negotiation Related	Revisions to Dan Schlanger declaration re fees
3/24/2020	Evan S. Rothfarb	1.5	Research	Research on Defendant entities, including name changes, place of business, incorporation, etc.
3/24/2020	Evan S. Rothfarb	0.7	Review	Review of intake materials
5/27/2020	Evan S. Rothfarb	1.4	Email Related	Correspondence with Dan Schlanger and co-counsel re: complaint and jurisdiction
6/30/2020	Evan S. Rothfarb	0.5	Email Related	Correspondence with opposing counsel re: revisions to letter motion and stipulation extending time to answer
7/1/2020	Evan S. Rothfarb	0.2	Review	Review of ECF Order granting extension to respond to complaint
7/13/2020	Evan S. Rothfarb	0.2	Email Related	Correspondence with co-counsel and opposing counsel re: settlement call
7/13/2020	Evan S. Rothfarb	0.6	Review	Review of Ben Drachler memo on catalyst fees and follow-up research
7/14/2020	Evan S. Rothfarb	0.4	Email Related	Correspondence with co-counsel and opposing counsel re: teleconference with opposing counsel
7/15/2020	Evan S. Rothfarb	0.5	Teleconference	Call with opposing counsel
7/15/2020	Evan S. Rothfarb	0.5	Prepare	Prepare for call with opposing counsel re: settlement/case status
7/15/2020	Evan S. Rothfarb	0.1	Teleconference	Confer with Dan Schlanger re: call with opposing counsel
7/24/2020	Evan S. Rothfarb	0.1	Email Related	Correspondence with opposing counsel re: settlement and mediation
7/24/2020	Evan S. Rothfarb	0.3	Email Related	Correspondence with Linda Soza re: stip extending answer deadline
7/27/2020	Evan S. Rothfarb	0.3	Edit/Revise	Revisions to second stipulation extending answer deadline

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
7/27/2020	Evan S. Rothfarb	0.4	Edit/Revise	Correspondence with opposing counsel re: mediation, protective order, and second stipulation extending answer deadline
7/30/2020	Evan S. Rothfarb	0.2	Teleconference	Call with new counsel for Monitronics
7/30/2020	Evan S. Rothfarb	0.5	Email Related	Correspondence with new counsel for Monitronics and Dan Schlanger re: new counsel
7/31/2020	Evan S. Rothfarb	0.3	Teleconference	Call with Dan Schlanger and co-counsel re: JAMS mediation and protective order
8/17/2020	Evan S. Rothfarb	0.5	Email Related	Review of correspondence between Beth Terrell and opposing counsel re: settlement and proposed confidentiality agreement
8/19/2020	Evan S. Rothfarb	0.4	Teleconference	Correspondence re: mediation and stipulation extending answer deadline
9/8/2020	Evan S. Rothfarb	0.2	Email Related	Review of correspondence between co-counsel and opposing counsel
9/16/2020	Evan S. Rothfarb	0.5	Email Related	Correspondence with Dan Schlanger, Beth Terrell, Ben Drachler and opposing counsel re: proposed discovery schedule and Magistrate Judge mediation
9/25/2020	Evan S. Rothfarb	0.3	Email Related	Review of Dan Schlanger and Beth Terrell correspondence re: CMP
10/2/2020	Evan S. Rothfarb	0.4	Email Related	Correspondence between opposing counsel and Dan Schlanger re: case schedule and mediation
10/6/2020	Evan S. Rothfarb	0.5	Email Related	Correspondence with co-counsel re: revisions to initial disclosures
1/20/2021	Evan S. Rothfarb	0.3	Review	Review of case file
2/26/2021	Arjun D. Shah	0.2		Reviewing email chain with Dan Schlanger and Terrell Marshall attorneys re discovery issues with defendant
2/26/2021	Arjun D. Shah	0.2	Review	Reviewing First Amended Complaint
3/3/2021	Arjun D. Shah	1.3		Teams call with Ben Drachler re discovery status and issues with opposing counsel
3/3/2021	Arjun D. Shah	0.5		Reviewing discovery and related correspondence
3/4/2021	Arjun D. Shah	0.9	Document Production Related	Reviewing correspondence and memoranda re Tier 1 discovery disputes and defendant's responses, objections and production (.7); review magistrate shields individual rules re discovery disputes (.2)
3/4/2021	Arjun D. Shah	1.2	Pleadings/Motions/Petition related	Review pleadings and scheduling order (0.4); draft joint letter motion re rescheduling status conference (0.7)
3/4/2021	Arjun D. Shah	0.3		Revise joint letter motion re rescheduling status conference re Tier 1 discovery and draft email to co-counsel re same
3/4/2021	Arjun D. Shah	0.2	Email Related	Draft email to opposing counsel re joint letter motion requesting adjournment of status conference

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
3/5/2021	Arjun D. Shah	0.3		Receipt & review of email from opposing counsel re stipulated ESI protocol, confidentiality agreement, adjournment of status conference and response to meet and confer; review opposing counsel response to meet and confer
3/8/2021	Arjun D. Shah	0.4		Confer with Dan Schlanger re joint letter motion requesting adjournment of status conference; revise same
3/8/2021	Arjun D. Shah	0.3	Email Related	Draft email to co-counsel re joint letter requesting adjournment of status conference
3/8/2021	Arjun D. Shah	0.1	Email Related	Draft email to opposing counsel re consent to file joint letter motion requesting adjournment of status conference
3/17/2021	Arjun D. Shah	0.1	Email Related	Draft email to co-counsel Ben Drachler re defendants' supplemental document production and status letter to court
3/17/2021	Arjun D. Shah	0.2	Email Related	Draft email to co-counsel Ben Drachler re status letter to court and ESI production
3/17/2021	Arjun D. Shah	0.2	Email Related	Draft email to opposing counsel re status of supplemental production
3/17/2021	Arjun D. Shah	0.2		Receipt & review of email from co-counsel Ben Drachler re ESI protocols and proposed stipulation and order re ESI
3/18/2021	Arjun D. Shah	2		Review discovery and draft status letter to court; draft email to opposing counsel re status of supplemental production
3/19/2021	Arjun D. Shah	0.1		Draft email to opposing counsel re authorization to file joint status letter re discovery to Court
3/19/2021	Arjun D. Shah	0.1	Edit/Revise	Revise joint status letter per opposing counsel's edits and email Linda Soza re ECF filing of same
3/24/2021	Arjun D. Shah	0.1	Email Related	Follow up email to co-counsel re status of defendants' supp Tier 1 production
3/26/2021	Arjun D. Shah	0.3	Email Related	Draft email to opposing counsel re production of outstanding discovery
3/29/2021	Arjun D. Shah	0.3		Telephone call with Spencer Richards (atty for defendants) re status of supplemental production
3/29/2021	Arjun D. Shah	0.3	Email Related	Draft email to co-counsel re phone call with Defendants' attorney re status of supplemental production
3/30/2021	Arjun D. Shah	0.1	Review	Review emails re discovery/motion to compel strategies
3/30/2021	Arjun D. Shah	0.1	Email Related	Email Ben Drachler re filing of ESI protocol
3/30/2021	Arjun D. Shah	3.4	Review	Reviewing discovery for status call with court; confer with Dan Schlanger re same
4/1/2021	Arjun D. Shah	0.2		Review email from Dan Schlanger re status conference with court re discovery; confer with Dan Schlanger re talking points for status conference

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
4/1/2021	Arjun D. Shah	0.2		Telephone call with Judge Shields Chambers re scheduling of telephonic status conference
4/1/2021	Arjun D. Shah	0.4		Email Dan Schlanger, Beth Terrell and Ben Drachler re additional proposed search terms
4/2/2021	Arjun D. Shah	0.2		Receipt & review of Boolean terms from Ben Drachler
4/2/2021	Arjun D. Shah	0.2		Receipt & review of draft letter to opposing counsel re search terms and Tier 1 discovery/document production issues
4/7/2021	Arjun D. Shah	3		Work on Tier 2 discovery requests to Defendants
4/8/2021	Arjun D. Shah	4.1		Work on Tier 2 discovery requests
4/9/2021	Arjun D. Shah	3.3		Work on Tier 2 discovery requests
4/9/2021	Arjun D. Shah	0.1		Receipt & review of plaintiff's ESI disclosures
4/12/2021	Arjun D. Shah	0.2	Email Related	Draft email to opposing counsel re scheduling phone call re status of Defendants' 'refund' email production
4/13/2021	Arjun D. Shah	1.1		Conference call with Ben Drachler and Spencer Richards (defs atty) re defs' ASAPer refund emails and outstanding discovery issues
4/13/2021	Arjun D. Shah	0.3		Prepare for conference call with Ben Drachler and Spencer Richards re refund emails from defendants to customers and discovery
4/13/2021	Arjun D. Shah	1.8	Email Related	Draft email to co-counsel summarizing conference call with Spencer re refund emails sent to customers; Draft email to opposing counsel re summary of conference call and follow up
4/13/2021	Arjun D. Shah	0.6	Research	Research re Pardot and Sales email automation business and technology
4/16/2021	Arjun D. Shah	1.1		Conference call with Ben Drachler and Spencer Richards re discovery and refund email production
4/16/2021	Arjun D. Shah	0.5		Draft summary of conference call with Ben Drachler and Spencer Richards re Brinks' ASAPer refund emails and outstanding discovery
4/16/2021	Arjun D. Shah	0.5		Receipt & initial review of Defendants spreadsheet re refund data and ESI disclosures
4/21/2021	Arjun D. Shah	0.1	Email Related	Review emails from Ben Drachler re Brinks' affidavit re emails and joint discovery schedule
4/22/2021	Arjun D. Shah	4.9	Draft	Draft joint letter to Court re discovery disputes
4/22/2021	Arjun D. Shah	0.5		Reviewing affidavit of David Verret, Chief Accounting Officer for Defendant Brinks Home Security re refund emails
4/22/2021	Arjun D. Shah	0.5		Confer with Dan Schlanger re discovery plan; Draft letter to court re extension of time to file joint discovery plan; draft email to opposing counsel re consent to same

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
4/23/2021	Arjun D. Shah	0.1		Receipt & review of text order re extension of time to file joint discovery plan; email Ben Drachler re same
4/23/2021	Arjun D. Shah	1.4		Telephone call with co-counsel Ben Drachler re joint discovery plan and position letter to court re discovery disputes
4/23/2021	Arjun D. Shah	0.2		Work on joint discovery plan
4/26/2021	Arjun D. Shah	1		Research re spoliation in Second Circuit
4/26/2021	Arjun D. Shah	0.8	Edit/Revise	Review Ben Drachler edits to "plaintiff's position" in joint letter to court re discovery and add edits re spoliation law
4/26/2021	Arjun D. Shah	1.5		Work on plaintiff's position letter to Court re discovery (0.5); drafting joint discovery schedule (0.4); reviewing exhibits and data to Brinks affidavit re refund emails (0.5)
4/26/2021	Arjun D. Shah	1.4	Review	Reviewing Brinks Affidavit of Chief Accounting Officer re refunds
4/26/2021	Arjun D. Shah	0.3		Telephone call with Ben Drachler re defendants' affidavit and exhibits re refunds & discovery strategies
4/27/2021	Arjun D. Shah	0.8		Telephone call with Ben Drachler re Brinks refund email Affidavit/exhibits and letter to Court re same
4/27/2021	Arjun D. Shah	0.6		Teams call with Beth Terrell, Dan Schlanger and Ben Drachler re Brinks Affidavit re refunds and strategies re same
4/27/2021	Arjun D. Shah	1.1	Draft	Draft memo re issues with Brinks Affidavit and spreadsheets/data re refunds
4/27/2021	Arjun D. Shah	0.9	Edit/Revise	Revise/edit letter to court re Brinks affidavit and refund emails per teams call with co-counsel
4/27/2021	Arjun D. Shah	1.1	ECF Filing Related	Draft Notice of Appearance and ECF filing of same; draft letter to court re joint discovery schedule and ECF filing of same
4/28/2021	Arjun D. Shah	3	Draft	Drafting letter to Magistrate re Defendants' discovery non-compliance and request for sanctions
4/29/2021	Arjun D. Shah	1.1		Reviewing Ben Drachler's revisions to letter to Magistrate re ESI spoliation; research re availability of sanctions pursuant to FRCP 37(e) and edit/revise letter per same
4/29/2021	Arjun D. Shah	1		Review Dan Schlanger edits to letter to Court re FRCP 37(e) sanctions and defendants' discovery non-compliance
4/29/2021	Arjun D. Shah	0.6	Edit/Revise	proof and line edit letter to magistrate re defendants' discovery non-compliance; email co-counsel re same
4/29/2021	Arjun D. Shah	0.5	ECF Filing Related	finalize letter to magistrate and exhibits thereto re motion for discovery sanctions and ECF filing of same

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
4/30/2021	Arjun D. Shah	0.1		Receipt & review of Order denying motion for discovery/sanctions
4/30/2021	Arjun D. Shah	0.1	Email Related	Draft email to Ben Drachler re meet and confer and scheduling conference with the court
4/30/2021	Arjun D. Shah	0.2	Email Related	Emails with Ben Drachler re Order denying discovery/sanctions; draft email to opposing counsel re scheduling meet and confer
5/3/2021	Arjun D. Shah	0.1	Email Related	Email opposing counsel re scheduling meet and confer
5/7/2021	Arjun D. Shah	1.4		Reviewing discovery and motion to court for sanctions; prep for meet and confer
5/7/2021	Arjun D. Shah	2	Meeting	Attend telephonic meet and confer with opposing counsel and Ben Drachler re outstanding T1 discovery and refund emails/data; draft notes re call
5/11/2021	Arjun D. Shah	0.1		Receipt & review of search terms hit list and email from opposing counsel re discovery
5/11/2021	Arjun D. Shah	0.8		Reviewing notes re meet and confer with opposing counsel on 5/7/21; telephone call with co-counsel Ben Drachler re letter to opposing counsel re discovery deficiencies and failures and strategies for raising dispute to court (0.6)
5/12/2021	Arjun D. Shah	2	Draft	Draft letter to opposing counsel re discovery disputes and scheduling conference call with the Court re same; email co-counsel Ben Drachler re draft
5/14/2021	Arjun D. Shah	0.3		Reviewing email and links therein from Spencer Richards re seed lists and ESI liaison and responses to Ben Drachler questions re Verret Affidavit
5/17/2021	Arjun D. Shah	0.1	Email Related	Draft email to Ben Drachler re ESI discovery
5/19/2021	Arjun D. Shah	0.4		Reviewing emails to co-counsel re discovery disputes with defendants; confer with Alan Frazin re same
5/19/2021	Arjun D. Shah	0.9		Telephone call with Ben Drachler re strategies for response to opposing counsel's email re Pardot and ESI
5/20/2021	Arjun D. Shah	0.3	Email Related	Review emails from Spencer Richards and Ben Drachler re meet and confer; draft email to Spencer Richards re scheduling same
5/21/2021	Arjun D. Shah	1.2	Meeting	Meet and confer conference call with Spencer Richards and Beth Terrell re Verret Affidavit, outstanding discovery, tier 2 discovery and refund data
5/21/2021	Arjun D. Shah	1		Reviewing discovery and prepare for meet and confer with opposing counsel
5/21/2021	Arjun D. Shah	0.1	Email Related	Draft email to Spencer Richards re confirmation of production of spreadsheet from defendants' IT dept and first rolling production of docs
6/10/2021	Arjun D. Shah	0.3		Reviewing defendant's document production; reviewing email and memo from Ben Drachler re defendant's document production

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
6/11/2021	Arjun D. Shah	0.6		Teams call with co-counsel Ben Drachler re discovery
6/18/2021	Arjun D. Shah	0.2		Receipt of email with password protected link to defendant's rolling document production. Coordinate with Jackie Osterlof re incorrect password and accessing same
6/21/2021	Arjun D. Shah	0.4		Reviewing defendant's second rolling document production
6/22/2021	Arjun D. Shah	1.5		Reviewing defendant's document production and plaintiff's tier 2 discovery requests
6/22/2021	Arjun D. Shah	0.6	Settlement/Negotiation Related	Conference call with Dan Schlanger, Beth Terrell and Ben Drachler re discovery/settlement strategies
6/22/2021	Arjun D. Shah	2.3	Settlement/Negotiation Related	Drafting settlement demand; email draft of same to co-counsel for review
6/22/2021	Arjun D. Shah	0.1		Review Ben Drachler drafts of second set of ROG and RPD
6/23/2021	Arjun D. Shah	0.3	Email Related	Review emails from Ben Drachler re plaintiff's draft settlement demand and edits to same
6/24/2021	Arjun D. Shah	0.2	Email Related	Reviewing emails re defendant's document production and discovery responses
6/25/2021	Arjun D. Shah	0.1		Receipt & review of insurance policy for Monitronics
7/6/2021	Arjun D. Shah	0.2	Document Production Related	Draft emails to Ben Drachler re defendant's 6/18/21 document production
7/6/2021	Arjun D. Shah	0.1	Settlement/Negotiation Related	Receipt & review of defendant's FRE 408 settlement counter offer
7/6/2021	Arjun D. Shah	0.1		Review email from Ben Drachler re Brinks' insurance policy and coverage limits
7/7/2021	Arjun D. Shah	0.2		Email Alan Frazin and Jackie Osterlof re access to defendant's document production and saving same to system; review documents
7/12/2021	Arjun D. Shah	0.1	Email Related	Review emails from co-counsel and def re defs request for extension of time to respond to ROG and RPD
7/20/2021	Arjun D. Shah	0.1		Receipt & review of Dan Schlanger draft letter to Judge Shields requesting stay pending
7/23/2021	Arjun D. Shah	0.1	Settlement/Negotiation Related	Review Dan Schlanger comments re list of potential mediators
7/27/2021	Arjun D. Shah	0.2	Settlement/Negotiation Related	Receipt & review of email and spreadsheet from Ben Drachler re ASAPer payments/refunds and use in mediation negotiations
8/16/2021	Arjun D. Shah	0.2	Review	Review draft joint letter from opposing counsel re selection of mediator and extension of discovery stay pending completion of mediation; review prior emails from Ben Drachler re discovery for mediation
9/30/2021	Arjun D. Shah	0.4	Email Related	Review discovery re NY subclass members and draft email to Dan Schlanger re same

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
1/7/2022	Arjun D. Shah	2	Pleadings/Motions/Petition related	Work on Declaration in support of Plaintiff's service fee award and email Dan Schlanger and co-counsel draft of same
1/7/2022	Arjun D. Shah	0.6	Settlement/Negotiation Related	Reviewing class settlement agreement [0.2]; telephone call with co-counsel Adrienne McEntee re proposed non-disparagement clause in Settlement Agreement [0.2]; draft email to Adrienne McEntee re sample non-disparagement clauses [0.2]
3/4/2022	Arjun D. Shah	0.2	Email Related	Review and response to email from co-counsel Ben Drachler re email and postcard notice and IVR
3/7/2022	Arjun D. Shah	0.7		Reviewing noticing materials to class members (IVR script, email and postcard) and email Dan Schlanger re mistake in IVR script
4/11/2022	Arjun D. Shah	0.1		Receipt & review of class administrator noticing report re returned mail, exclusions and objections received as of 4/11/22
6/10/2020	Isaac Taubes	1	Review	Reviewed case info in preparation of drafting initial documents
6/15/2020	Isaac Taubes	1	Draft	Drafted Initial Disclosures
6/15/2020	Isaac Taubes	1.2	Draft	Drafted Request for the production of documents
6/15/2020	Isaac Taubes	1	Draft	Drafted ROGS
6/15/2020	Isaac Taubes	1	Confer	Discussed edits for Discovery documents with supervising attorney. Finalized draft documents for co-counsel.
6/16/2020	Isaac Taubes	1	Draft	Edited interrogatories after input from Dan Schlanger
6/17/2020	Isaac Taubes	0.6	Email Related	Finalized Rogs and emailed to co-counsel for review.
5/25/2020	Alan Frazin	0.4	Draft	Draft civil cover sheet and summonses
6/2/2020	Alan Frazin	0.2	Edit/Revise	Revise Complaint
6/4/2020	Alan Frazin	0.3	Draft	Draft Notice of Appearance for Evan Rothfarb, send Summonses and Complaint for service
6/4/2020	Linda Soza	0.1	Draft	Created Notice of Appearance for Evan Rothfarb
6/16/2020	Alan Frazin	0.2	Calendaring	Calendar CMP dates
6/25/2020	Alan Frazin	0.4	Draft	Draft stip waiving service and extending answer
6/29/2020	Alan Frazin	0.3	Edit/Revise	Update stipulation
7/24/2020	Linda Soza	0.3	Draft	Drafted second Stipulation to extend defendant's deadline to answer & emailed to Evan Rothfarb & Dan Schlanger.
8/10/2020	Alan Frazin	0.1	Review	Review correspondence between co-counsel and opposing counsel

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
8/17/2020	Alan Frazin	0.3	Review	Review multiple emails between Beth Terrell and opposing counsel re confidentiality agreement and save drafts to file
8/18/2020	Alan Frazin	0.3	Document Production Related	Review co-counsel and opposing counsel's correspondence and confidentiality agreement drafts and file same; and review correspondence re arbitrator
8/19/2020	Alan Frazin	0.5	Document Production Related	Review multiple emails re extension, confidentiality, arbitrator, and document production; file document production, extension stip drafts; review, file and calendar court documents
8/20/2020	Alan Frazin	0.1	ECF Filing Related	Review, file and calendar court documents
8/26/2020	Alan Frazin	0.1	Review	Review co-counsel's correspondence with opposing counsel
9/10/2020	Aaron Kadish	0.3	Calendaring	Confirming details and calendaring 26f zoom meeting for Dan Schlanger on 9/11/20
9/11/2020	Aaron Kadish	0.3	Email Related	Saving documents from Dan Schlanger email to file
9/13/2020	Alan Frazin	0.2	Review	Review and file Judge's individual orders
9/14/2020	Aaron Kadish	0.3	Draft	Taking dictated letter from Dan Schlanger to Magistrate Judge
9/14/2020	Aaron Kadish	0.8	Draft	Drafted letter from Dan Schlanger to Magistrate Judge; revise and format in same
9/14/2020	Aaron Kadish	0.1	Draft	Saved discovery plan worksheet as pdf, filled in dates and emailed back to Dan Schlanger
9/14/2020	Aaron Kadish	0.3	Edit/Revise	Revised Dan Schlanger letter to Magistrate Judge Shields; edit to discovery plan worksheet; emailed all to co-counsels
9/21/2020	Alan Frazin	0.1	ECF Filing Related	Review, file and calendar court documents
9/25/2020	Aaron Kadish	0.1	Edit/Revise	Edited dates on discovery plan worksheet and added text from Dan Schlanger email
11/13/2020	Linda Soza	0.4	ECF Filing Related	Downloaded and converted Settlement Statement Letter to Judge Shields into PDF, discussed with Dan Schlanger the format of filing, and filed under a sealed ECF per the Judge's orders.
1/24/2021	Alan Frazin	0.6	Document Production Related	Review and file document production
3/31/2021	Linda Soza	1	Document Production Related	Prepared Status Conference binder per Dan Schlanger's request.
4/1/2021	Linda Soza	0.5	Review	Reviewed Defendant's discovery production in preparation to assist Dan Schlanger for today's schedule Status Conference.
4/14/2021	Jaclyn Osterlof	0.1	Calendaring	Conferring with opposing counsel re follow-up call re Defendant's document production.
9/22/2021	Alan Frazin	0.3	Document Production Related	Preparing discovery excerpts for mediation statement

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
10/3/2021	Alan Frazin	1.7	Settlement/Negotiation Related	Draft settlement agreement
10/5/2021	Alan Frazin	0.1	Settlement/Negotiation Related	Reviewing class spreadsheet and emails
10/21/2021	Alan Frazin	0.6	Settlement/Negotiatio	Revise settlement agreement
11/14/2021	Alan Frazin	0.2	Settlement/Negotiation Related	Review class list
11/16/2021	Alan Frazin	0.6	Settlement/Negotiation Related	Finding release language for Settlement Agreement
11/17/2021	Alan Frazin	0.6	Settlement/Negotiation Related	Draft settlement documents
11/18/2021	Alan Frazin	0.2	Settlement/Negotiation Related	Finalize extension request letter and save latest Settlement Agreement
11/18/2021	Jaclyn Osterlof	0.1		Finalize letter re extension for filing.
11/22/2021	Alan Frazin	0.4	Settlement/Negotiation Related	Collating settlement agreement exhibits
12/28/2021	Alan Frazin	0.2	Settlement/Negotiation Related	Confer with Dan Schlanger re settlement language, finding it and sending to Dan Schlanger
1/10/2022	Alan Frazin	2.9	Settlement/Negotiation Related	Draft Dan Schlanger declaration
4/1/2022	Linda Soza	0.2	Email Related	Gathered fee petition docs and shared with co-counsel (Ben Drachler) for his review.
4/4/2022	Alan Frazin	1.4	Review	Create time and expense report and review for Dan Schlanger missing time
4/12/2022	Alan Frazin	0.5	Settlement/Negotiation Related	Draft fee petition
4/13/2022	Alan Frazin	0.7	Settlement/Negotiation Related	Draft fee petition
4/14/2022	Alan Frazin	0.3	Draft	Draft Dan Schlanger Affidavit in support of Fee Petition
4/20/2022	Alan Frazin	0.9	Settlement/Negotiation Related	Revisions to fee petition

Expenses

4/30/2020		$ 0.31	Research	Lexis-Nexis Research

Silver v. Livewatch Security, LLC et al. 20-cv-2478 (JS)(AYS) (E.D.N.Y.)

Schlanger Law Group Time and Expense

Date	Team Member	Hours	Activity category	Description
5/31/2020		$ 6.70	Research	Lexis-Nexis Research
6/3/2020		$ 400.00	Filing Fee	EDNY Filing Fee Receipt BNYEDC-12879447
6/10/2020		$ 60.00	Service of Process	Service on Livewatch
6/10/2020		$ 60.00	Service of Process	Service on Monitronics
9/30/2020		$ 1.86	Research	Lexis-Nexis Research
10/31/2020		$ 0.78	Research	Lexis-Nexis Research
12/31/2020		$ 1.35	Printing	Printing
1/31/2021		$ 4.43	Research	Lexis-Nexis Research
2/28/2021		$ 1.37	Research	Lexis-Nexis Research
3/31/2021		$ 17.40	Printing	Printing
4/30/2021		$ 28.75	Research	Lexis-Nexis Research
4/30/2021		$ 7.35	Printing	Printing
6/30/2021		$ 4.20	Printing	Printing
10/4/2021		$ 9.89	Research	Lexis-Nexis Research
11/1/2021		$ 6.60	Printing	Printing
11/30/2021		$ 5.84	Research	Lexis-Nexis Research
11/30/2021		$ 12.60	Printing	Printing
12/14/2021		$ 4,101.73	Arbitration	Payment to the National Arbitration Mediation (NAM) company for the mediation fee plus overage in document review.
12/31/2021		$ 4.20	Printing	Printing
1/31/2022		$ 7.35	Printing	Printing

Sumary

Team Member	**Hours**	**Rate**	**Total**
Daniel A. Schlanger	92.3	$ 625.00	$ 57,687.50
Evan S. Rothfarb	11.8	$ 550.00	$ 6,490.00
Arjun D. Shah	77.6	$ 425.00	$ 32,980.00
Isaac Taubes	6.8	$ 375.00	$ 2,550.00
Paralegals	20.6	$ 200.00	$ 4,120.00
Expenses			$ 4,742.71
Total	209.1		$ 108,570.21