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7 *Class Counsel*

8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 PAULA SPARKMAN, on behalf of herself and
12 all others similarly situated,

13 Plaintiff,

14 v.

15 COMERICA BANK, a foreign corporation, and
16 CONDUENT STATE & LOCAL SOLUTIONS,
17 INC., a foreign corporation,

18 Defendants.

NO. 4:23-cv-02028-DMR

**DECLARATION OF BLYTHE H.
CHANDLER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS AND
SERVICE AWARD**

The Honorable Donna M. Ryu

CLASS ACTION

19 I, Blythe H. Chandler, declare as follows:

20 1. I am a member of the law firm of Terrell Marshall Law Group PLLC, counsel of
21 record for plaintiff in this matter. I am admitted *pro hac vice* in this matter and am a member in
22 good standing of the bar of the state of Washington. I respectfully submit this declaration in
23 support of Plaintiff's Motion for Attorneys' Fees, Costs and Service Awards. Except as
24 otherwise noted, I have personal knowledge of the facts set forth in this declaration and could
25 testify competently to them if called upon to do so.

26 **A. Terrell Marshall's work on this case**

27 2. Terrell Marshall has advanced significant costs for and invested numerous hours
into the investigation and prosecution of this case. We will continue to commit the time and

1 resources necessary to litigate the case and fairly and adequately represent and protect the
2 interests of the Class.

3 3. We took a targeted approach to discovery in this case, focusing on the documents,
4 data, and testimony needed to support class certification and prove the merits of Ms. Sparkman's
5 claims. We served seven sets of written discovery on the two Defendants and responded to four
6 sets of written discovery Defendants served on Ms. Sparkman. Defendants' production included
7 over 8,500 pages of documents and Conduent's records of Way2Go cardholders who reported
8 unauthorized charges.

9 4. We also subpoenaed documents from the California Department of Child Support
10 Services.

11 5. We retained data scientist Jonathan Jaffe to analyze Conduent's cardholder data,
12 identify Way2Go cardholders whose claims of unauthorized transactions were denied for similar
13 reasons as Ms. Sparkman's claim, and calculate their damages.

14 6. We deposed five Conduent employees, including the employees who handled Ms.
15 Sparkman's claims, the Director of Claims, and the Director of Fraud Prevention. We also
16 deposed Defendants' expert, who opined on Defendants' investigation procedures. Ms.
17 Sparkman was deposed by Defendants' counsel.

18 7. After mediating with the Honorable Jose Linares (Ret.) on November 11, 2024,
19 we filed Plaintiffs' motion for class certification. We continued to engage in arm's-length
20 settlement negotiations throughout December 2024 and reached an agreement on the key terms
21 in January 2025, before Defendants responded to the motion for class certification.

22 **B. Background and experience.**

23 8. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex
24 civil and commercial litigation with an emphasis on consumer protection, product defect, civil
25 rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel
26 representing multi-state and nationwide classes in state and federal court in Washington and
27 throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have

1 represented scores of classes, tried class actions in state and federal court, and obtained hundreds
2 of millions of dollars in monetary relief to workers, consumers, and other individuals.

3 9. I joined Terrell Marshall in 2014 and became a member in 2018. I practice
4 complex litigation with a focus on prosecution of consumer class actions. I have been appointed
5 class counsel in cases challenging a wide range of unfair or deceptive practices. In 2010, I
6 received my J.D. from the University of Washington School of Law with high honors, Order of
7 the Coif. I served as Chief Articles Editor for the Washington Law Review. Before joining
8 Terrell Marshall, I served as a law clerk to the Honorable Betty B. Fletcher, Senior United States
9 Circuit Judge for the Ninth Circuit Court of Appeals, and to the Honorable John C. Coughenour,
10 Senior United States District Judge for the Western District of Washington. I also served as a
11 judicial extern to the Honorable Robert S. Lasnik, United States District Judge for the Western
12 District of Washington. I co-authored chapters of the Consumer Protection Deskbook published
13 by the Washington State Association for Justice (WSAJ) and have spoken on topics including
14 litigation of consumer claims, including under the EFTA, and use of experts and personal
15 jurisdiction in class actions. I am a member of the Public Justice Foundation's Board of
16 Directors, the Washington Employment Lawyers Association (WELA) Amicus Committee, and
17 currently co-chair WSJA's Consumer Protection Section.

18 **C. Qualifications of other Terrell Marshall attorneys.**

19 10. Beth E. Terrell is a founding member of Terrell Marshall. With almost thirty
20 years of experience, Ms. Terrell concentrates her practice in complex litigation, including the
21 prosecution of multi-plaintiff, collective, mass and class litigation and arbitration on behalf of
22 consumers and workers. Ms. Terrell has served as co-lead counsel on multi-state and nationwide
23 class actions, resulting in hundreds of millions of dollars in settlements for consumers and
24 workers. Ms. Terrell also represents individual employees with discrimination, sexual
25 harassment, trade secret and restrictive covenant claims. Ms. Terrell co-chairs PLI's Consumer
26 Financial Services Institute, is a past President of the Public Justice Foundation Board of
27 Directors, serves as Chair of both the Northwest Consumer Law Center and the Washington

1 Employment Lawyers Association, and is a fellow of the American College of Consumer
2 Financial Services Lawyers. In 2023, Ms. Terrell was awarded the National Consumer Law
3 Center’s Vern Countryman Award, recognizing special contributions to consumer law. A
4 member of the State Bar of California and the Washington State Bar Association, Ms. Terrell
5 frequently presents on a wide variety of topics, including class actions, consumer protection,
6 legal ethics, gender equity, and electronic discovery.

7 11. Amanda M. Steiner became a member of Terrell Marshall in 2015. She practices
8 complex litigation, including the prosecution of consumer, defective product, wage and hour, and
9 civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in
10 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that
11 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex
12 securities, antitrust, consumer and civil rights class action in federal and state courts throughout
13 the United States. Ms. Steiner was selected for inclusion in the annual Northern California
14 “Super Lawyers” list and was named to the Top 50 Women Lawyers of Northern California. She
15 is a Fellow of the American Bar Foundation.

16 12. Ryan Tack-Hooper was a member of Terrell Marshall from 2020 to 2025. He
17 concentrated on class actions to protect employees, consumers, and people whose civil rights
18 have been violated. He has been co-lead counsel in successful litigation across the country in
19 state and federal courts, including cases involving discrimination on the basis of disability,
20 religion, speech, and race. In 2009, Mr. Tack-Hooper received a J.D., cum laude, from New
21 York University School of Law. Before joining Terrell Marshall, Mr. Tack-Hooper was the
22 Legal Director of the American Civil Liberties Union of Delaware, where he practiced civil
23 rights law. He has also served as an adjunct professor of law at the University of Pennsylvania
24 Law School, where he taught legal writing. He was a law clerk to the Honorable Jerome B.
25 Simandle, Chief Judge of the United States District Court for the District of New Jersey.

26 13. Jasmin Rezaie was an associate at Terrell Marshall from 2022 to 2025. Ms.
27 Rezaie concentrated her practice in complex civil litigation. Ms. Rezaie graduated from Seattle

1 University School of Law in 2022. During law school, she interned with the Washington State
2 Labor Council, Columbia Legal Services, the ACLU of Washington, and Chief Justice
3 González’s chambers in the Washington Supreme Court. Before law school, Ms. Rezaie worked
4 as an immigration paralegal.

5 14. Heather Brown is a senior paralegal at Terrell Marshall with more than 22 years
6 of experience in the legal field.

7 15. Jodi Nuss is a senior paralegal at Terrell Marshall with more than 15 years of
8 experience in the legal field.

9 **D. Other cases litigated by Terrell Marshall**

10 16. Examples of consumer protection class actions that Terrell Marshall is litigating
11 or has litigated to successful completion include:

- 12 a. *Nelipa v. TD Bank, N.A.*—Filed in 2021 on behalf of bank
13 customers who were duped by bank impersonators into
14 approving unauthorized transactions and allege TD Bank
15 violated the Electronic Fund Transfer Act and breached its
16 form account agreement in denying their fraud claims. A
17 magistrate judge for the Eastern District of New York
18 recommended certification of a litigation class in June 2024
19 and the district court adopted the recommendation in part in
20 October 2025, certifying a narrower class.
- 21 b. *Jammeh v. HNN Associates LLC*—Filed in 2019 on behalf
22 of low-income tenants who alleged a large landlord
23 improperly retained their security deposits and a debt
24 collector collected impermissible interest on their accounts.
25 The Western District of Washington certified a litigation
26 class and denied defense motions for summary judgment.
27 The court granted final approval of a \$1.6 million
settlement on June 9, 2021. The settlement also required
the debt collector to correct credit reporting, enter partial
satisfactions of judgment, and cease collecting interest on
class member accounts.
- c. *Marical v. BECU*—Filed in 2019 on behalf of account
holders charged them excessive overdraft fees. The King
County Superior Court granted final approval of \$6 million
settlement on September 27, 2021.

- 1 d. *Van Fleet v. Trion Worlds, Inc.*—Filed in 2015 on behalf of
2 a nationwide class of online video game players deprived
3 of a promised discount on purchases of virtual goods and
4 who participated in an alleged illegal lottery. The San
5 Mateo County Superior Court granted final approval of a
6 \$420,000 settlement on June 1, 2020.
- 7 e. *Wornicki v. BrokerPriceOpinion.com*—Filed in 2013 on
8 behalf of a nationwide class of people who provided home
9 valuations, known as broker price opinions, but who were
10 not paid for the opinions as promised. The District of
11 Colorado granted final approval of a settlement of more
12 than \$1.5 million on September 20, 2018.
- 13 f. *Jordan v. Nationstar Mortgage, LLC*—Filed in 2012 on
14 behalf of Washington homeowners who were improperly
15 locked out of their homes by their mortgage lender. The
16 Eastern District of Washington granted final approval of a
17 \$17 million settlement on May 2, 2019.
- 18 g. *Carrillo v. Wells Fargo Bank, N.A.*—Filed in 2018 on
19 behalf of borrowers who allege Wells Fargo charged them
20 interest rates on residential loans that were higher than the
21 rates disclosed in the bank’s buydown agreements and
22 closing disclosures. The Eastern District of Washington
23 granted final approval of a \$17 million settlement on May
24 2, 2019.
- 25 h. *Paredes Garcia v. Harborstone Credit Union*—Filed in
26 2021 on behalf of consumers who participate in the
27 Deferred Action for Childhood Arrivals program or who
otherwise do not hold United States citizenship but reside
in the United States. The plaintiff alleges that Harborstone
has engaged in a policy and practice of depriving
consumers of the right to contract based on their alienage
status in violation of 42 U.S.C. § 1981. The plaintiff also
alleges that Harborstone has engaged in a policy and
practice of obtaining consumer reports on these individuals
in violation of the Fair Credit Reporting Act, 15 U.S.C. §
1681b. The parties entered into a settlement agreement on
December 19, 2022, that will award damages to hundreds
of settlement class members and changed Harborstone’s
lending policies. The Western District of Washington
granted final approval of the settlement on November 9,
2023.

1 17. Additional information about class actions litigated by Terrell Marshall is
2 available on our website, www.terrellmarshall.com.

3 **E. Terrell Marshall's lodestar**

4 18. Terrell Marshall has advanced significant costs for and invested numerous hours
5 into the investigation and prosecution of this case. We will continue to commit the time and
6 resources necessary to the approval and settlement administration process.

7 19. Since the beginning of this case, Terrell Marshall has worked with no guarantee
8 of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always
9 been contingent on successfully obtaining relief for the plaintiff and Settlement Class Members.
10 As a result, there was a substantial risk of non-payment, particularly in light of the challenges
11 inherent in this type of case. Work on this case has necessarily been to the exclusion of work on
12 other matters that likely would have generated fees. Terrell Marshall has also been denied use of
13 the fees it earned over the course of this case.

14 20. The work performed by paralegals and legal assistants was work that I or an
15 attorney would have had to perform absent such assistance. In the case of Jodi Nuss and Heather
16 Brown, the work required an understanding of the facts and claims at issue in the case and was
17 important to the development of those facts and claims. Indeed, Jodi Nuss's work included
18 extensive data analysis that was instrumental to calculate damages. These staff members are
19 qualified to perform substantive legal work based on their training and past experience working
20 for attorneys.

21 21. A spreadsheet that compiles the contemporaneously maintained billing records of
22 Terrell Marshall attorneys and staff is attached as Exhibit A. I have reviewed these billing
23 records and reduced and eliminated time where appropriate. I removed all time recorded for
24 timekeepers with fewer than 20 hours in the case and for document preparation and filing done
25 by legal secretaries. Additionally, I eliminated more than 130 hours billed by a junior associate
26 on work that was significantly revised by a supervising partner. In total, I reduced Terrell
27 Marshall's time by 242.1 hours, which lowered the firm's lodestar by \$98,627.00. I believe that

1 the time billed was reasonably necessary to litigate this case and secure a settlement on behalf of
2 Plaintiffs and the Class.

3 22. The following table identifies the attorneys and staff members from Terrell
4 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the
5 timekeepers below I have stated the current hourly rate, the number of hours worked through
6 September 15, and the total amount of fees. These time summaries are taken from
7 contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the regular
8 course of business.

9	10	11	12	13	14
NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL	
ATTORNEYS					
13 14 15 16	Beth E. Terrell Founding Member J.D. from Univ. of California, Davis School of Law, 1995	Participated in overall case strategy; revised pleadings and motions; assisted with discovery and settlement strategy; handled preliminary approval hearing.	\$1,150	32.2	\$37,835
17 18 19 20 21	Amanda Steiner Member J.D. from UC Berkeley School of Law, 1997	Drafted response to motion to strike jury demand, motion to compel, motion for class certification, mediation statement, and motion for preliminary approval; worked on settlement notice and administration issues.	\$950	175.4	\$166,630
22 23 24 25 26 27	Blythe H. Chandler Member J.D. from Univ. of Washington School of Law, 2010	Responsible for case management and overall case strategy; investigated facts, developed legal claims, and drafted complaint; drafted oppositions to motions to dismiss; managed discovery and	\$800	358.6	\$286,880

DECLARATION OF BLYTHE H. CHANDLER IN
SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS'
FEES, COSTS AND SERVICE AWARD - 8Case No. 4:23-
cv-02028-DMR

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
	expert work; took most depositions; defended Ms. Sparkman’s deposition and expert deposition; responsible for all briefing; negotiated and documented settlement.			
Ryan Tack-Hooper J.D. from New York Univ. School of Law, 2009	Took expert deposition.	\$750	26.8	\$20,100
Jasmine Rezaie Associate (former) J.D. from Seattle Univ. School of Law, 2022	Drafted discovery requests; assisted with depositions; worked on legal claims; worked on mediation statement; participated in mediation.	\$500	353.5	\$176,750
PARALEGALS				
Jodi Nuss Senior Paralegal 11 years legal experience	Managed, processed, and analyzed data productions, and document productions; worked with expert on damages analysis.	\$330	30.9	\$10,197
Heather Brown Senior Paralegal 22 years legal experience	Processed document productions; assisted with deposition preparation and motion for class certification.	\$330	68.8	\$22,704
TOTAL:			1046.2	\$721,096

23. I anticipate the firm will incur additional fees in relation to the final approval and settlement administration process.

24. Terrell Marshall’s lodestar calculations are based on reasonable hourly rates. Terrell Marshall sets rates for attorneys and staff members based on a variety of factors, including the experience, skill and sophistication required for the types of legal services typically

1 performed; the rates customarily charged in the markets where legal services are typically
 2 performed; and the experience, reputation and ability of the attorneys and staff members.

3 24. Terrell Marshall has incurred out-of-pocket litigation expenses totaling \$55,235.13,
 4 primarily to cover expenses related to mediation, expert costs, transcript and court reporting
 5 costs, filing fees, travel for Ms. Sparkman's in-person deposition, and administrative costs such
 6 as copying, mailing, and messenger expenses. The following chart summarizes Terrell
 7 Marshall's litigation costs:

Category of Expense	Total
Air Fare	\$214.35
FedEx	\$404.26
Filing Fees	\$634.00
Hotel	\$372.28
Meals	\$125.38
Expert	\$10,329.00
Transcripts	\$12,001.95
Electronic Production/Data Hosting	\$942.90
Mediation	\$22,985.32
Court Reporter	\$7,116.38
Court Documents	\$10.00
Taxi	\$99.34
TOTAL	\$55,235.16

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I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

EXECUTED this 9th day of October, 2025 at Seattle, Washington.

By: /s/ Blythe H. Chandler
Blythe H. Chandler, *Admitted Pro Hac Vice*

- Exhibit A -

Comerica EFTA
Matter ID 2617-001
Fees Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Statement Professional: Amanda M. Steiner						
460420	06/15/2023	AMS	Strategy conference regarding motion to strike jury demand and motion to dismiss, related emails [0.5]; reviewed and analyzed motion to strike and declaration in support [0.7]; research regarding [REDACTED] [3.0].	4.20	950.00	3,990.00
460427	06/16/2023	AMS	Worked on response to motion to strike jury demand, related research [2.8].	2.80	950.00	2,660.00
460544	06/19/2023	AMS	Worked on response to motion to strike jury demand, related research [5.3].	5.30	950.00	5,035.00
460610	06/20/2023	AMS	Worked on response to motion to strike jury demand, related research [5.9].	5.90	950.00	5,605.00
460880	06/23/2023	AMS	Reviewed revisions to response to motion to strike [0.3]; strategy conference regarding brief [0.2].	0.50	950.00	475.00
484122	05/14/2024	AMS	Reviewed judge's discovery motion procedures [0.2]; drafted motion to compel, related research, factual review, and strategy conference [4.8].	5.00	950.00	4,750.00
485292	06/20/2024	AMS	Strategy conference regarding class certification [0.3].	0.30	950.00	285.00
487562	07/08/2024	AMS	Worked on motion for class certification, including review of deposition transcripts and exhibits [7.5].	7.50	950.00	7,125.00
487551	07/09/2024	AMS	Worked on class certification motion, including compiling evidence from deposition transcripts and exhibits, legal research [3.2].	3.20	950.00	3,040.00
487550	07/10/2024	AMS	Worked on fact section of class certification motion, including review of deposition transcripts and exhibits [8.3].	8.30	950.00	7,885.00
487546	07/11/2024	AMS	Worked on fact section of class certification motion, reviewed deposition transcripts and exhibits [8.6].	8.60	950.00	8,170.00
487544	07/12/2024	AMS	Worked on class certification motion, related research, factual analysis [4.6].	4.60	950.00	4,370.00
487538	07/14/2024	AMS	Worked on class certification motion, related research [4.6].	4.60	950.00	4,370.00
487536	07/15/2024	AMS	Worked on class certification motion, related research [5.5].	5.50	950.00	5,225.00
486764	07/16/2024	AMS	Worked on motion for class certification [1.5]; worked on motion to seal [0.2]; worked on exhibits [0.3].	2.00	950.00	1,900.00
487529	07/17/2024	AMS	Worked on stipulation to extend case deadlines [0.2].	0.20	950.00	190.00
487526	07/18/2024	AMS	Worked on declaration and exhibits in support of class certification motion and list of confidential exhibits [1.1].	1.10	950.00	1,045.00
489903	08/26/2024	AMS	Reviewed mediation statement and related strategy conference [1.3].	1.30	950.00	1,235.00
489897	08/27/2024	AMS	Reviewed revised mediation statement and related strategy conference [0.8].	0.80	950.00	760.00

Trans No	Date	Prof	Narrative	Units	Price	Value
489700	08/28/2024	AMS	Strategy conference regarding settlement issues [0.2]; reviewed settlement agreement and briefing in Almon case and related summarizing email [1.0]; reviewed briefing in Shelton v Comerica matter [0.8]; worked on mediation statement, related research [0.8].	2.80	950.00	2,660.00
489887	08/29/2024	AMS	Worked on mediation statement, related research [6.4].	6.40	950.00	6,080.00
489884	08/30/2024	AMS	Worked on shared and ex parte mediation statements [0.7].	0.70	950.00	665.00
490541	09/04/2024	AMS	Revised mediation statement [0.5].	0.50	950.00	475.00
491810	09/27/2024	AMS	Worked on class certification motion, related research [4.2].	4.20	950.00	3,990.00
492035	09/30/2024	AMS	Worked on class certification motion, related research [2.2].	2.20	950.00	2,090.00
494917	11/13/2024	AMS	Strategy conference regarding settlement issues [.2]; worked on class certification motion [.3].	0.50	950.00	475.00
495347	11/21/2024	AMS	Worked on revisions to motion for class certification [.4]; strategy conferences regarding motion [.6]; drafted proposed order [1.0]; worked on exhibits, declaration, and confidentiality issues and revised motion to seal [2.2].	4.20	950.00	3,990.00
495574	11/22/2024	AMS	Finalized class certification motion, declaration in support and exhibits, motion to seal and proposed order [4.6].	4.60	950.00	4,370.00
496777	12/04/2024	AMS	Revised stipulation regarding 30(b)(6) deposition topics [.2].	0.20	950.00	190.00
499051	01/09/2025	AMS	Strategy conference regarding settlement issues [.2].	0.20	950.00	190.00
514124	03/27/2025	AMS	Worked on preliminary approval motion, related research [3.8].	3.80	950.00	3,610.00
514123	03/28/2025	AMS	Worked on preliminary approval motion, related research [6.6].	6.60	950.00	6,270.00
514160	04/02/2025	AMS	Worked on preliminary approval motion [4.5].	4.50	950.00	4,275.00
514113	04/03/2025	AMS	Worked on preliminary approval motion [2.6].	2.60	950.00	2,470.00
514108	04/04/2025	AMS	Worked on preliminary approval motion, related research [4.6].	4.60	950.00	4,370.00
514105	04/07/2025	AMS	Worked on preliminary approval motion, related research [4.2].	4.20	950.00	3,990.00
505069	04/08/2025	AMS	Worked on motion for preliminary approval and proposed order [2.6]; email with Mr. Schlanger regarding motion and declaration [.2].	2.80	950.00	2,660.00
514099	04/09/2025	AMS	Worked on motion for preliminary approval and proposed order [4.2].	4.20	950.00	3,990.00
514080	04/16/2025	AMS	Revised preliminary approval motion and proposed order [.5].	0.50	950.00	475.00
514066	04/17/2025	AMS	Worked on settlement issues [.2].	0.20	950.00	190.00
514060	04/18/2025	AMS	Revised settlement agreement and proposed order to comply with revised settlement agreement and other edits [2.6].	2.60	950.00	2,470.00
514003	04/29/2025	AMS	Revised motion for preliminary approval and notices [2.5].	2.50	950.00	2,375.00
507635	05/14/2025	AMS	Revised motion for preliminary approval and supporting documents [2.2].	2.20	950.00	2,090.00
507631	05/15/2025	AMS	Finalized and supervised filing of motion for preliminary approval of settlement and related documents [1.4].	1.40	950.00	1,330.00
509958	06/13/2025	AMS	Worked on outline and notebook for preliminary approval hearing [.9].	0.90	950.00	855.00
509980	06/16/2025	AMS	Drafted outline for preliminary approval hearing [2.5].	2.50	950.00	2,375.00
510168	06/17/2025	AMS	Worked on outline for preliminary approval hearing [2.3]; drafted revised proposed order [.2].	2.50	950.00	2,375.00

Trans No	Date	Prof	Narrative	Units	Price	Value
510390	06/18/2025	AMS	Email to Ms. Perkins regarding revised proposed order [.1].	0.10	950.00	95.00
510606	06/25/2025	AMS	Researched and summarized preliminary approval orders and briefing [2.2]; worked on hearing preparation and related strategy conferences [.7].	2.90	950.00	2,755.00
510707	06/26/2025	AMS	Worked on hearing preparation and revised notice [1.1]; strategy conference and emails regarding hearing additional information to submit to court [.5]; emails to co-counsel regarding declarations [.3]; emails with settlement administrator regarding declaration [.9]; worked on revisions to notices [.9].	3.70	950.00	3,515.00
510949	06/27/2025	AMS	Strategy conferences regarding preliminary approval [.8]; meeting with ALCS regarding administration issues [.3]; revised notices and drafted email notice [2.9]; emails with ALCS regarding declaration [.5].	4.50	950.00	4,275.00
511164	07/01/2025	AMS	Meeting with Mr. Pirrung from ALCS regarding settlement administration issues and declaration [.6]; strategy conferences regarding supplemental briefing and declarations in support of preliminary approval [.4]; drafted declaration and supplemental brief [1.7]; heavily revised Pirrung declaration [3.2]; revised notices [.8]; emails with Mr. Pirrung and defense counsel regarding notices and declaration [.4].	7.10	950.00	6,745.00
511182	07/02/2025	AMS	Telephone conferences with Mr. Pirrung regarding declaration [.6]; revised declaration [.7]; emails with Mr. Pirrung regarding declaration [.5]; reviewed minute order, revised long form notice, and email to defense counsel [.8]; drafted supplemental memorandum in support of preliminary approval [.7].	3.30	950.00	3,135.00
513769	07/07/2025	AMS	Meeting with Mr. Pirrung [.5]; revised supplemental brief and declaration in support of preliminary approval [.5]; revised Pirrung declaration and related emails [3.1]; emails with Mr. Schlanger regarding declaration [.3]; revised and finalized brief and declarations [1.9]; emails with defense counsel regarding notices and supplemental brief [.3].	6.60	950.00	6,270.00
514284	08/12/2025	AMS	Revised declaration in support of preliminary approval [.2].	0.20	950.00	190.00
515309	08/27/2025	AMS	Worked on notice issues [.2].	0.20	950.00	190.00
Statement Professional: Amanda M. Steiner				175.40		166,630.00
Statement Professional: Beth E. Terrell						
516759	03/28/2023	BET	Video conference with co-counsel regarding potential claims and drafting complaint [.6].	0.60	1,150.00	690.00
516760	04/04/2023	BET	Strategy meeting regarding case development and co-counsel agreement [.5].	0.50	1,150.00	575.00
516764	04/12/2023	BET	Reviewed draft complaint [.5]	0.50	1,150.00	575.00
516766	04/13/2023	BET	Strategy conference regarding venue and case strategy [.3].	0.30	1,150.00	345.00
516768	04/18/2023	BET	Reviewed complaint. [.2]	0.20	1,150.00	230.00
516769	04/19/2023	BET	Reviewed joint prosecution agreement. [.2]	0.20	1,150.00	230.00
516765	04/21/2023	BET	Exchanged emails with Ms. Chandler regarding joint prosecution agreement [.2].	0.20	1,150.00	230.00

Trans No	Date	Prof	Narrative	Units	Price	Value
516770	06/14/2023	BET	Discussed motion to dismiss with co-counsel [.4].	0.40	1,150.00	460.00
516771	06/15/2023	BET	Strategy conference regarding motion to strike jury demand and motion to dismiss, related emails [0.5]; exchanged emails with co-counsel regarding briefing schedule on motion to dismiss. [.3]	0.80	1,150.00	920.00
516772	06/16/2023	BET	Telephone call regarding briefing on motion to dismiss response [.2].	0.20	1,150.00	230.00
516773	06/20/2023	BET	Exchanged emails with co-counsel regarding briefing schedule on motion to dismiss response [.2].	0.20	1,150.00	230.00
516774	06/23/2023	BET	Strategy conference regarding brief [0.2].	0.20	1,150.00	230.00
516775	07/11/2023	BET	Exchanged emails with co-counsel regarding motion to dismiss argument and setting Rule 26(f) conference [.2].	0.20	1,150.00	230.00
516776	07/21/2023	BET	Meeting with co-counsel to prepare for Rule 26(f) conference [.3].	0.30	1,150.00	345.00
516777	07/27/2023	BET	Reviewed first set of interrogatories and requests for production to each defendant. [.3]	0.30	1,150.00	345.00
516779	08/07/2023	BET	Reviewed order on motion to dismiss. [.2]	0.20	1,150.00	230.00
516781	08/16/2023	BET	Discussed amended complaint with co-counsel [.3].	0.30	1,150.00	345.00
516819	12/04/2023	BET	Strategy conference with co-counsel regarding updated joint case management statement [.1]	0.10	1,150.00	115.00
516820	12/14/2023	BET	Exchanged discovery strategy correspondence with co-counsel regarding discovery next steps [.2].	0.20	1,150.00	230.00
516821	01/04/2024	BET	Strategy conference with co-counsel regarding revision to meet and confer letter and next steps [.2]; exchanged email correspondence with co-counsel regarding the same [.1].	0.30	1,150.00	345.00
516823	01/05/2024	BET	Video conference with co-counsel regarding case strategy and order on motion to dismiss and next steps. [.5].	0.50	1,150.00	575.00
516824	01/10/2024	BET	Video conference with co-counsel regarding case management and strategy [.2].	0.20	1,150.00	230.00
516825	01/17/2024	BET	Telephone conference with co-counsel regarding research and next steps [.1]; Exchanged email correspondence with co-counsel regarding second amended complaint. [.2]	0.30	1,150.00	345.00
516826	03/06/2024	BET	Discussed mediation letter and strategy with co-counsel [.2].	0.20	1,150.00	230.00
516827	04/18/2024	BET	Strategy conference regarding response to motion [0.5].	0.50	1,150.00	575.00

Trans No	Date	Prof	Narrative	Units	Price	Value
516828	05/14/2024	BET	Strategy conference regarding motion to compel and discovery motion procedures. [5].	0.50	1,150.00	575.00
516832	05/20/2024	BET	Strategy conference regarding joint discovery letter and conference. [4].	0.40	1,150.00	460.00
516833	06/20/2024	BET	Strategy conference regarding class certification [0.3].	0.30	1,150.00	345.00
516837	07/25/2024	BET	Strategy conference regarding mediation logistics. [2]	0.20	1,150.00	230.00
516834	08/26/2024	BET	Reviewed mediation statement and related strategy conference [1.3].	1.30	1,150.00	1,495.00
516808	08/28/2024	BET	Strategy conference regarding settlement issues [0.2].	0.20	1,150.00	230.00
516809	09/05/2024	BET	Reviewed settlement agreement. [5]	0.50	1,150.00	575.00
516810	11/13/2024	BET	Strategy conference regarding settlement issues [2]; videoconference regarding Carl Pry deposition. [3]	0.50	1,150.00	575.00
516805	11/19/2024	BET	Telephone call with co-counsel regarding settlement offer [2].	0.20	1,150.00	230.00
516804	11/20/2024	BET	Exchanged emails with co-counsel regarding potential settlement and data. [4].	0.40	1,150.00	460.00
516803	11/21/2024	BET	Email to co-counsel regarding settlement status. [1]; strategy conferences regarding motion for class certification. [6]	0.70	1,150.00	805.00
516802	11/22/2024	BET	Reviewed motion for class certification [5]	0.50	1,150.00	575.00
516801	12/04/2024	BET	Worked with co-counsel on settlement issues. [1].	1.00	1,150.00	1,150.00
516800	12/13/2024	BET	Reviewed term sheet. [2]	0.20	1,150.00	230.00
516797	12/20/2024	BET	Video conference with co-counsel regarding settlement strategy [6].	0.60	1,150.00	690.00
516796	12/27/2024	BET	Telephone call with Mr. Grugan and Ms. Chandler regarding settlement negotiations [3]; strategy conference regarding same [1].	0.40	1,150.00	460.00
516815	01/09/2025	BET	Strategy conference regarding settlement issues [2].	0.20	1,150.00	230.00
516816	01/13/2025	BET	Videoconference with co-counsel regarding further settlement offer [5].	0.50	1,150.00	575.00
516795	01/17/2025	BET	Reviewed revised draft settlement agreement. [3]	0.30	1,150.00	345.00
516794	01/22/2025	BET	Video conference with co-counsel regarding class notices [5].	0.50	1,150.00	575.00
516793	01/30/2025	BET	Reviewed memo on revisions to settlement agreement [3]	0.30	1,150.00	345.00
516792	01/31/2025	BET	Telephone call with co-counsel regarding letter to people with high dollar claims [2].	0.20	1,150.00	230.00
516790	04/21/2025	BET	Telephone call with co-counsel regarding settlement agreement [3].	0.30	1,150.00	345.00
516817	04/29/2025	BET	Reviewed revised settlement agreement. [2]	0.20	1,150.00	230.00
516806	05/07/2025	BET	Reviewed signed settlement agreement and exhibits. [2]	0.20	1,150.00	230.00

Trans No	Date	Prof	Narrative	Units	Price	Value
516818	05/15/2025	BET	Reviewed motion for preliminary approval of class action settlement and declaration in support of same. [.3]	0.30	1,150.00	345.00
	06/24/2025	BET	Prepared for hearing on plaintiff's motion for preliminary approval of class action settlement. [1.8]	1.80	1,150.00	2,875.00
516799	06/25/2025	BET	Prepared for hearing on plaintiff's motion for preliminary approval of class action settlement [3]; attended hearing [2]; strategy conference regarding hearing [.3].	5.30	1,150.00	6,095.00
516788	06/26/2025	BET	Strategy conference and emails regarding hearing additional information to submit to court [.5].; Prepared for and attended hearing on plaintiff's motion for preliminary approval of class action settlement. [2]	2.50	1,150.00	2,875.00
516787	06/27/2025	BET	Strategy conference regarding preliminary approval [.8]; meeting with ALCS regarding settlement issues [.3].	1.10	1,150.00	1,265.00
516786	07/01/2025	BET	Strategy conferences regarding supplemental briefing and declarations in support of preliminary approval [.4]; meeting with ALCS regarding settlement and notice issues [.6].	1.00	1,150.00	1,150.00
	01/07/1900	BET	Revised supplemental memorandum and declarations [.8]; revised notices [.3].	1.10	1,150.00	1,265.00
516785	07/30/2025	BET	Reviewed order on motion for preliminary approval. [1]	0.10	1,150.00	115.00
516784	08/11/2025	BET	Reviewed order from court on prepaid card payment option. [1]	0.10	1,150.00	115.00
516783	08/12/2025	BET	Reviewed third supplemental declaration in support of plaintiff's motion for preliminary approval. [.2]	0.20	1,150.00	230.00
516782	08/13/2025	BET	Reviewed order granting preliminary approval. [.2]	0.20	1,150.00	230.00
Statement Professional: Beth E. Terrell				32.20		37,835.00
Statement Professional: Blythe H. Chandler						
455164	03/24/2023	BHC	Reviewed client documents and researched statute in preparation for drafting complaint [1].	1.00	800.00	800.00
454827	03/28/2023	BHC	Prepared for meeting with co-counsel [.2]; video conference with co-counsel regarding potential claims and drafting complaint [.6].	0.80	800.00	640.00
455244	04/03/2023	BHC	Commenced drafting complaint; legal research related to same [2.9].	2.90	800.00	2,320.00
455407	04/04/2023	BHC	Video conference with client [.7]. Telephone call with co-counsel regarding case development and co-counsel agreement [.5]. Commenced drafting complaint [5.5].	6.70	800.00	5,360.00
455516	04/05/2023	BHC	Reviewed phone records and additional documents from client [.6]; email to client regarding same [.1].	0.70	800.00	560.00
455633	04/07/2023	BHC	Worked on complaint.	6.70	800.00	5,360.00
456004	04/12/2023	BHC	Completed draft complaint and sent to co-counsel for review [5].	5.00	800.00	4,000.00
456023	04/13/2023	BHC	Legal research regarding venue provisions [.2]; telephone call with co-counsel regarding venue and case strategy [.3]. Email to client providing draft complaint [.2]. Email to potential local counsel [.2].	0.90	800.00	720.00
457552	04/17/2023	BHC	Revised complaint based on client comments and co-counsel input [1]; email to client regarding same [.1].	1.10	800.00	880.00
457557	04/18/2023	BHC	Sent revised complaint to co-counsel for final review [.1].	0.10	800.00	80.00

Trans No	Date	Prof	Narrative	Units	Price	Value
457802	04/19/2023	BHC	Revised joint prosecution agreement and sent same to all counsel with revised complaint [.4].	0.40	800.00	320.00
456474	04/21/2023	BHC	Exchanged emails with co-counsel regarding joint prosecution agreement [.2].	0.20	800.00	160.00
457790	04/25/2023	BHC	Worked on issues related to class definition [.9].	0.90	800.00	720.00
457828	05/10/2023	BHC	Emails and telephone calls with co-counsel regarding consenting to magistrate; approved consent to magistrate for filing [.3].	0.30	800.00	240.00
458036	05/15/2023	BHC	Email to staff regarding status of service [.1].	0.10	800.00	80.00
458540	05/17/2023	BHC	Email to co-counsel regarding status of service [.1].	0.10	800.00	80.00
460349	06/14/2023	BHC	Read and analyzed motion to dismiss [1]; Discussed motion to dismiss with co-counsel [.4].	1.40	800.00	1,120.00
460448	06/15/2023	BHC	Exchanged emails with co-counsel regarding briefing schedule on motion to dismiss [.3]. Telephone call with co-counsel regarding response to motion to strike jury demand [.1].	0.40	800.00	320.00
460453	06/16/2023	BHC	Telephone call with co-counsel regarding briefing on motion to dismiss response [.2].	0.20	800.00	160.00
460535	06/17/2023	BHC	Legal research related to response to motion to dismiss [1.5].	1.50	800.00	1,200.00
460643	06/20/2023	BHC	Exchanged emails with co-counsel regarding briefing schedule on motion to dismiss response [.2]. Legal research related to motion to dismiss response [3.8].	4.00	800.00	3,200.00
460670	06/21/2023	BHC	Worked on response to motion to strike jury demand; sent same to co-counsel for review.	0.50	800.00	400.00
460671	06/21/2023	BHC	Legal research related to response to motion to dismiss [1.3]. Commenced drafting response to motion to dismiss [3.5].	4.80	800.00	3,840.00
460831	06/22/2023	BHC	Research regarding choice of law issues [.4]. Worked on motion to dismiss response [6.7].	7.10	800.00	5,680.00
460870	06/22/2023	BHC	Continued drafting response to motion to dismiss.	1.00	800.00	800.00
460967	06/23/2023	BHC	Revised response to motion to strike jury instructions [1]. Worked on response to motion to dismiss [2.4].	3.40	800.00	2,720.00
460971	06/24/2023	BHC	Legal research related to response to motion to dismiss [.5]. Worked on response to motion to dismiss [2.7].	3.20	800.00	2,560.00
461020	06/26/2023	BHC	Revised motion to dismiss response [1.9]; reviewed final versions of same for filing [.2]. Worked on declaration and redactions of exhibit with staff [.5]. Revised response to motion to strike jury demand [.5]. Telephone conference with client regarding [REDACTED] [.4].	3.50	800.00	2,800.00
463163	07/11/2023	BHC	Reviewed Judge's standing order regarding civil motions remote appearances [.3]. Exchanged emails with co-counsel regarding motion to dismiss argument and setting Rule 26(f) conference [.2].	0.50	800.00	400.00
463168	07/12/2023	BHC	Email to defense counsel to schedule Rule 26 conference [.2].	0.20	800.00	160.00
463314	07/21/2023	BHC	Meeting with co-counsel to prepare for Rule 26(f) conference [.3]. Rule 26(f) conference with defense counsel [.4].	0.70	800.00	560.00

Trans No	Date	Prof	Narrative	Units	Price	Value
463250	07/25/2023	BHC	Read and analyzed reply brief in support of motion to dismiss; legal research related to same [.5].	0.50	800.00	400.00
463271	07/26/2023	BHC	Legal research related to motion to dismiss hearing [.1]. Continued legal research in preparation for hearing [.8]. Email to co-counsel regarding cancelled hearing [.1].	1.00	800.00	800.00
463312	07/26/2023	BHC	Drafted joint case management statement.	2.40	800.00	1,920.00
463419	07/27/2023	BHC	Drafted first set of interrogatories and requests for production to each defendant. [2.7]. Revised same and sent to co-counsel [.7].	3.40	800.00	2,720.00
463634	07/31/2023	BHC	Revised Rule 26(f) report based in part on comments from co-counsel and sent same to defense counsel [.8]	0.80	800.00	640.00
463806	08/02/2023	BHC	Telephone call with co-counsel regarding work on case [.1]. Telephone call with co-counsel regarding draft sets of discovery requests [.4]; follow up call with Ms. Rezaie regarding same [.3]; follow up email providing samples for same [.2]. Revised first set of discovery requests [.4].	1.40	800.00	1,120.00
463843	08/03/2023	BHC	Finalized first set of discovery requests [.3]. Drafted service email to defendant for same [.1].	0.40	800.00	320.00
463914	08/04/2023	BHC	Worked with co-counsel on analysis of client documents to produce with initial disclosures [.2]; follow up email regarding same [.1]	0.30	800.00	240.00
464729	08/14/2023	BHC	Worked on amended complaint [5].	5.00	800.00	4,000.00
464963	08/16/2023	BHC	Discussed amended complaint with co-counsel [.3]. Prepared for case management conference [.5]; appeared for case management conference [.6].	1.40	800.00	1,120.00
464912	08/17/2023	BHC	Worked on first amended complaint [.3]. Telephone call with client regarding first amended complaint [.2]. Reviewed client documents related to IVR charges [.2]. Drafted additional factual allegations, class definition, and claims based on impermissible IVR charges [1.2].	1.90	800.00	1,520.00
465780	08/18/2023	BHC	Email to client regarding first amended complaint [.1]. Discussed first amended complaint with co-counsel [.2]. Worked on first amended complaint [1.5]; discussed procedural issues related to filing first amended complaint with co-counsel; reviewed and approved final first amended complaint for filing [.4].	2.20	800.00	1,760.00
465339	08/21/2023	BHC	Email to defense counsel requesting confirmation of acceptance of e-service [.1]; sent email agreeing to extension of time to respond to discovery [.1].	0.20	800.00	160.00
465612	08/28/2023	BHC	Reviewed email from defense counsel regarding request for extension of time to answer [.1]; scheduled conference with co-counsel regarding case management [.1].	0.20	800.00	160.00
465687	08/29/2023	BHC	Email to co-counsel regarding proposed schedule for briefing second motion to dismiss [.2]; exchanged emails with defense counsel and approved stipulation relating to same [.4]. Telephone call with co-counsel regarding case management [.1].	0.70	800.00	560.00
466675	09/11/2023	BHC	Email to defense counsel confirming receipt of discovery and requesting Word copies [.1]; email to associate regarding work on same [.1].	0.20	800.00	160.00
467666	09/12/2023	BHC	Sent discovery requests to plaintiff to staff for formatting [.1]. Legal research relating to response to second motion to dismiss [3].	3.10	800.00	2,480.00

Trans No	Date	Prof	Narrative	Units	Price	Value
466942	09/15/2023	BHC	Legal research related to motion to dismiss [2.5].	2.50	800.00	2,000.00
467126	09/20/2023	BHC	Analyzed defendants' discovery requests.	3.60	800.00	2,880.00
467370	09/25/2023	BHC	Email to client regarding gathering information responsive to discovery requests [1].	1.00	800.00	800.00
467429	09/25/2023	BHC	Continued research relating to motion to dismiss response and commenced drafting response.	3.00	800.00	2,400.00
467470	09/26/2023	BHC	Exchanged email with client regarding discovery responses [1]. Email to client regarding screen shot of account [1]. Worked on response to motion to dismiss [7].	7.20	800.00	5,760.00
467586	09/27/2023	BHC	Worked on response to motion to dismiss [6.9]	6.90	800.00	5,520.00
467593	09/27/2023	BHC	Email to defense counsel regarding protective order and request for 1 week extension of discovery response date [1].	0.10	800.00	80.00
467617	09/28/2023	BHC	Final revisions of response to motion to dismiss [2.5]. Drafted declaration supporting motion to dismiss [1]. Reviewed and approved final formatted brief and declaration for filing [2].	2.80	800.00	2,240.00
467699	09/29/2023	BHC	Reviewed Defendants' proposed revisions to court's model protective order; email to defense counsel regarding same [6].	0.60	800.00	480.00
467904	10/03/2023	BHC	Exchanged emails with defense counsel regarding proposed protective order [3]. Exchanged emails with defense counsel regarding defendants request for further extension of discovery due date [1].	0.40	800.00	320.00
468379	10/11/2023	BHC	Email to defense counsel regarding protective order and document production [2].	0.20	800.00	160.00
468458	10/12/2023	BHC	Worked on stipulated protective order.	2.60	800.00	2,080.00
469107	10/13/2023	BHC	Worked on client objections and responses to discovery [1.3].	1.30	800.00	1,040.00
468796	10/16/2023	BHC	Meet and confer with defense counsel regarding timing of document production [2]. Email to defense counsel regarding form of document production and confirming meet and confer [2].	0.40	800.00	320.00
468706	10/18/2023	BHC	Worked on plaintiffs' interrogatory responses [8].	0.80	800.00	640.00
470318	11/09/2023	BHC	Email to defense counsel regarding discovery matters [1].	0.10	800.00	80.00
470801	11/20/2023	BHC	Reviewed documents produced by Conduent in advance of meet and confer [4]; email to co-counsel regarding same [1]; meet and confer with counsel for defendants regarding Plaintiff's first discovery requests [6]; email to co-counsel regarding same [1]. Worked with staff on providing call recordings to client [1].	1.30	800.00	1,040.00
471420	12/01/2023	BHC	Worked on joint case management statement [5].	0.50	800.00	400.00
471927	12/08/2023	BHC	Worked on document review.	0.10	800.00	80.00
472195	12/12/2023	BHC	Email to defense counsel regarding joint case management statement and discovery into consumer complaints [4].	0.40	800.00	320.00
472166	12/13/2023	BHC	Worked on joint case management statement and approved same for filing [3]. Email to defense counsel regarding ADR referral [2]. Email to co-counsel outlining next steps in discovery [4].	0.90	800.00	720.00

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473376	01/04/2024	BHC	Telephone call with mediator and defense counsel [.5]; email to co-counsel summarizing same [.2].	0.70	800.00	560.00
473379	01/04/2024	BHC	Further revised meet and confer letter; sent to co-counsel to manage finalizing and sending.	0.70	800.00	560.00
473468	01/05/2024	BHC	Video conference with co-counsel regarding case strategy [.5]; telephone call with client regarding [REDACTED] [.4].	0.90	800.00	720.00
473841	01/08/2024	BHC	Scheduled case management call with co-counsel [.1].	0.10	800.00	80.00
474166	01/10/2024	BHC	Email to defense counsel regarding request for deposition dates and meet and confer [.1]. Video conference with co-counsel regarding case management and strategy [.2].	0.30	800.00	240.00
475124	01/11/2024	BHC	Email to client regarding potential supplement to discovery responses [.2].	0.20	800.00	160.00
475318	01/16/2024	BHC	Read and analyzed Defendants' answer to complaint; email memo to co-counsel regarding same [.6].	0.60	800.00	480.00
474078	01/17/2024	BHC	Worked on issues relating to amending complaint [REDACTED] telephone conference regarding same [.3]; email to co-counsel provided proposed amended complaint and summary of reasons for same [.2].	0.50	800.00	400.00
474157	01/18/2024	BHC	Exchanged substantive emails with defense counsel regarding Plaintiff's proposed second amended complaint [.5]; discussed [REDACTED] [.1].	0.60	800.00	480.00
474152	01/19/2024	BHC	Drafted stipulation on Second Amended Complaint [.4].	0.40	800.00	320.00
474280	01/22/2024	BHC	Meet and confer with defendants [1].	1.00	800.00	800.00
475079	02/02/2024	BHC	Email to defense counsel regarding proposed stipulation and deposition dates [.2].	0.20	800.00	160.00
475508	02/07/2024	BHC	Exchanged emails with defense counsel and staff regarding filing stipulation and second amended complaint [.4].	0.40	800.00	320.00
477212	02/15/2024	BHC	Responded to email from mediator's office; email to client regarding same [.2]. Email to [REDACTED] [.1].	0.30	800.00	240.00
476254	02/16/2024	BHC	Email to defense counsel regarding deposition dates [.1].	0.10	800.00	80.00
476279	02/20/2024	BHC	Exchanged emails with defense counsel regarding deposition dates [.2].	0.20	800.00	160.00
476870	02/22/2024	BHC	Directed staff to update Sanchez deposition notice and sent same to Ms. Perkins [.1]. Emails to mediator appointed by district court and client regarding mediation [.2]; telephone call with client regarding mediation session [.2].	0.50	800.00	400.00
476421	02/23/2024	BHC	Prepared for mediation call [.3]; mediation call with Ms. Erlich [.8]. Post-mediation call with client [.4]; follow email to client [.2]. Telephone call with co-counsel regarding deposition preparation and mediator call [.3].	2.00	800.00	1,600.00
476837	02/28/2024	BHC	Worked with co-counsel on joint case management statement [.1].	0.10	800.00	80.00
477344	03/04/2024	BHC	Worked on Sanchez deposition outline [5.2]. Emails to defense counsel confirming deposition links and use of Agile [.2].	5.40	800.00	4,320.00
477350	03/04/2024	BHC	Worked on Froderman deposition outline.	0.90	800.00	720.00
477449	03/05/2024	BHC	Continued work on Sanchez deposition outline [.8].	0.80	800.00	640.00

Trans No	Date	Prof	Narrative	Units	Price	Value
477490	03/06/2024	BHC	Prepared for Sanchez deposition [.6]. Telephone call from defense counsel regarding deposition logistics [.1]. Conducted deposition of John Sanchez [4.2]. Discussed mediation letter and strategy with co-counsel [.2].	5.10	800.00	4,080.00
477503	03/06/2024	BHC	Worked on outline for Froderman deposition.	1.70	800.00	1,360.00
477530	03/07/2024	BHC	Prepared for Froderman deposition; conducted Froderman deposition [3.5].	3.50	800.00	2,800.00
477531	03/07/2024	BHC	Exchanged emails with co-counsel regarding potential expert; email to potential expert [.3].	0.30	800.00	240.00
477552	03/07/2024	BHC	Worked on joint case management statement [.5]. Worked on email to counsel for Conduent regarding outstanding document production [1].	1.50	800.00	1,200.00
477626	03/08/2024	BHC	Meeting with potential expert [.5]; approved retainer [.1]. Worked on mediation letter [.4].	1.00	800.00	800.00
477675	03/11/2024	BHC	Final review of letter to mediator; sent same to staff to finalize [.3]; email to mediator providing same [.1]. Worked with staff on additional discovery requests and deposition notices [.1].	0.50	800.00	400.00
478027	03/12/2024	BHC	Worked on Plaintiff's second set of discovery requests and sent same to co-counsel [1.2]. Telephone call from co-counsel regarding mediation and case management [.1]. Email to defense counsel regarding joint case management statement and meet and confer request [.2]. Edited joint case management statement per request from defense counsel and sent to staff to finalize [.1]; approved same for filing [.1]. Email to expert regarding case materials provided [.1]. Email to client regarding request for deposition transcripts [.1].	1.90	800.00	1,520.00
479305	03/13/2024	BHC	Scheduled meet and confer [.1]. Drafted Plaintiff's second set of discovery requests [3.2].	3.30	800.00	2,640.00
479277	03/14/2024	BHC	Prepared for meet and confer regarding Conduent document production [.6]; meet and confer with counsel for Conduent regarding document production [1.1].	1.70	800.00	1,360.00
479428	03/15/2024	BHC	Video conference with co-counsel regarding case management [.6]. Sent change of address to staff for caption updates [.1].	0.70	800.00	560.00
479310	03/22/2024	BHC	Forwarded court reporting invoice for payment [.1]. Correspondence to defense counsel regarding outstanding discovery matters [.9].	1.00	800.00	800.00
479370	03/26/2024	BHC	Reviewed deposition transcript invoices and approved for payment [.1]. Scheduled meeting with expert regarding report [.1].	0.20	800.00	160.00
479354	03/28/2024	BHC	Meeting with expert [1]; prepared for same [.3].	1.30	800.00	1,040.00
479357	03/28/2024	BHC	Email to defense counsel regarding status of document production and scheduling depositions [.8]; second message regarding same [.3]. Discussed potential deposition topics with co-counsel [.3]. Correspondence to defense counsel providing lengthy responses to discovery matters [1.2]. Drafted Plaintiff's Third set of Interrogatories and served same [.8]. Worked with staff on amended notice of Carter deposition and served same [.3].	3.70	800.00	2,960.00

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479272	03/29/2024	BHC	Reviewed document production; identified policy and procedure documents not produced for letter to defense counsel regarding incomplete production [1.5]; drafted letter to counsel for Conduent regarding supplementing policy document production [6]; reviewed and approved same to be sent [1].	2.20	800.00	1,760.00
479597	04/02/2024	BHC	Email to defense counsel regarding depositions and document production [4].	0.40	800.00	320.00
481745	04/03/2024	BHC	Drafted agenda for meet and confer with defense counsel [2]; prepared for meet and confer [3]. Meet and confer with defense counsel [5].	1.00	800.00	800.00
482002	04/04/2024	BHC	Reviewed analysis from associate regarding supplementing discovery responses [3]. Meet and confer with defense counsel regarding case management [3]. Email to defense counsel documenting meet and confer discussions [7].	1.30	800.00	1,040.00
480283	04/09/2024	BHC	Worked on assignment letter to expert [5]; videoconference with expert [7]. Worked on expert assignment letter [2.5].	3.70	800.00	2,960.00
480354	04/10/2024	BHC	Worked on expert assignment letter [6]; sent same [2]. Revised Rule 30(b)(6) deposition notice [4].	1.20	800.00	960.00
480566	04/12/2024	BHC	Email to defense regarding scheduling depositions [2]. Emails to staff regarding document production by Conduent [2]. Call with Ms. Terrell regarding deposition coverage [1]; email to co-counsel related to same [1].	0.60	800.00	480.00
481281	04/16/2024	BHC	Exchanged emails with co-counsel regarding case management and scheduling [2]. Email to expert regarding report deadline [2]. Email to client regarding deposition transcripts [1].	0.50	800.00	400.00
481781	04/25/2024	BHC	Exchanged emails with defense counsel and co-counsel regarding agreement to extend discovery cutoff and expert deadlines [2].	0.20	800.00	160.00
482024	05/03/2024	BHC	Telephone calls with co-counsel regarding case management and status of projects [5].	0.50	800.00	400.00
482014	05/06/2024	BHC	Drafted stipulated motion to amend case schedule [9]. Discussed deposition staffing with co-counsel [1]. Email to client regarding deposition dates [2]. Responded to questions from expert regarding query criteria [8].	2.00	800.00	1,600.00
482140	05/07/2024	BHC	Read and analyzed defendants contracts [3.5]. Email to defense counsel confirming agreement to produce policy documents and scheduling further meet and confer [2]. Exchanged multiple emails with defense counsel and client regarding date of client deposition [3]. Worked with co-counsel [2].	4.20	800.00	3,360.00
482433	05/08/2024	BHC	Read deposition transcripts in preparation for Opelt, Davis, and Ely depositions [4.5]. Commenced drafting Opelt deposition outline [2.5]. Reviewed questions from expert; substantive email addressing same [2]. Email to defense counsel regarding outstanding discovery matters [2].	7.40	800.00	5,920.00
482425	05/09/2024	BHC	Reviewed policy documents in preparation for Davis and Ely depositions [3.5]. Meet and confer with defense counsel regarding discovery disputes [6]; prepared for same [2]; discussed same with co-counsel [2]. Worked on Opelt deposition outline [1.5]. Reviewed revisions to stipulation to extend discovery cutoff and approved same for filing [2]. Email to client regarding deposition logistics [2].	6.40	800.00	5,120.00

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482424	05/10/2024	BHC	Completed work on Opelt deposition outline [1]. Commenced work on Davis deposition outline [4]. Email to defense counsel regarding requested discovery extension [.1].	5.10	800.00	4,080.00
482423	05/12/2024	BHC	Worked on Amy Davis Deposition outline [1.5].	1.50	800.00	1,200.00
482466	05/13/2024	BHC	Email to defense counsel regarding production of consumer complaints [.2]. Incorporated comments and suggestions from expert into Opelt deposition outline [.5]. Video conference with expert in preparation for Opelt deposition [.4]. Discussed case work priorities with co-counsel [.2]. Took Opelt deposition [2.5].	3.80	800.00	3,040.00
482488	05/13/2024	BHC	Continued work on Davis deposition outline [1.7]. Completed work on Amy Davis deposition outline [1]. Worked on Ely deposition outline [.8].	3.50	800.00	2,800.00
482618	05/14/2024	BHC	Drafted email to defense counsel regarding discovery disputes [.2]; email to co-counsel regarding drafting motion to compel with summary of arguments [.3]. Prepared for Davis deposition [.4]. Deposition of Amy Davis [4.5]. Email to client providing deposition notice [.1]. Telephone call with co-counsel regarding ██████████ [2]; email to co-counsel regarding deposition topics on same [.1]. Worked on motion to compel; sent same to all counsel for review and comment [.7]; incorporated co-counsel revisions into same and sent to defense counsel [.3]. Worked on Ely deposition outline [4].	10.80	800.00	8,640.00
482622	05/15/2024	BHC	Prepared for Ely deposition [.7]. Deposition of Jeffrey Ely [4.8]. Emails to and from court reporter for Ely deposition regarding exhibits and spelling of names [.1]. Worked on expert report [.6].	6.20	800.00	4,960.00
482651	05/16/2024	BHC	Drafted Rule 30(b)(6) notice to Conduent [1.6]. Wrote letter to defense counsel regarding written discovery issues and Rule 30(b)(6) notice [3.1]. Worked on subpoena and public record request to child support agency [.4].	5.10	800.00	4,080.00
482963	05/17/2024	BHC	Final review of expert report [.6]; telephone call with Ms. Nuss regarding same [.1]. Exchanged multiple emails with expert regarding finalizing expert report [.4]. Worked with staff on service of expert report [.2]. Worked on Rule 30(b)(6) deposition of Comerica Bank [.3].	1.60	800.00	1,280.00
483016	05/17/2024	BHC	Read and analyzed defendant's expert report [.6].	0.60	800.00	480.00
483022	05/17/2024	BHC	Worked on client discovery responses.	0.40	800.00	320.00
483172	05/20/2024	BHC	Reviewed Mr. Pry's prior cases; emails to co-counsel regarding analysis of same [1.5]. Final review of Comerica Rule 30(b)(6) deposition notice; sent same to staff to finalize [.2]. Telephone call with co-counsel regarding joint discovery letter strategy [.2]; email to defense counsel regarding joint discovery letter [.3]; follow up emails to Ms. Perkins regarding joint discovery letter [.1]. Worked on exhibit to joint discovery letter [.5]. Final strategy discussion with co-counsel [.2]. Reviewed Conduent portion of joint discovery letter [.4]; strategized regarding response to same [.1]; approved joint discovery letter for filing [.4].	3.90	800.00	3,120.00
483271	05/21/2024	BHC	Correspondence to defense counsel regarding request to meet and confer and substantive proposals on disputed discovery issues [1.4].	1.40	800.00	1,120.00

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483939	05/22/2024	BHC	Worked on issues related to redaction of client documents for production [.2]. Email to Opelt deposition court reporter regarding exhibits [.1]. Telephone call with California attorney general Curtis regarding subpoena and public records request [.2]; follow up emails regarding same [.1]. Scheduled final conference regarding issues raised in discovery letter to Court [.1].	0.70	800.00	560.00
483945	05/23/2024	BHC	Worked with staff on deposition notices to Conduent; approved same for service [.2]. Exchanged emails with defense counsel regarding discovery disputes [.1]. Worked on discovery correspondence regarding complete client transaction history [.2].	0.50	800.00	400.00
483437	05/24/2024	BHC	Prepared for meet and confer [.3]. Meet and confer regarding discovery responses [.6].	0.90	800.00	720.00
483714	05/28/2024	BHC	Meet and confer with defense counsel regarding status of discovery disputes [.5]. Revised confirming email regarding same; approved same [.4].	0.90	800.00	720.00
483701	05/30/2024	BHC	Worked with staff on production issues [.1].	0.10	800.00	80.00
483765	05/31/2024	BHC	Worked on case strategy issues [.2]. Prepared for client deposition preparation meeting [1.6]. Client deposition preparation meeting [2.4]. Responded to request for unredacted document from defense counsel [.6]. Telephone call with Ms. Wang regarding conduct of client deposition in related matter [.3].	5.10	800.00	4,080.00
484126	06/03/2024	BHC	Reviewed client documents to respond to question from Conduent's counsel [.3]. Telephone call with client regarding deposition [.3]. Email to defense counsel regarding client documents [.1].	0.70	800.00	560.00
484244	06/04/2024	BHC	Defended client's deposition [3]; lunch meeting with client regarding deposition [1].	4.00	800.00	3,200.00
484786	06/06/2024	BHC	Email to co-counsel regarding client deposition [.2].	0.20	800.00	160.00
484360	06/07/2024	BHC	Email to defense counsel regarding expert issues [.1]. Telephone call with defense counsel regarding potential mediation and case schedule [.4]. Memo to co-counsel regarding current case schedule and case management tasks [1.2].	1.70	800.00	1,360.00
484805	06/11/2024	BHC	Email to defense counsel regarding ER 408 discussion [.1].	0.10	800.00	80.00
484806	06/12/2024	BHC	Telephone call with co-counsel regarding case management and expert depositions [.2]. Telephone call with defense counsel regarding mediation and case schedule [.4]. Sent draft stipulation to extend case deadlines [.1]. Contacted potential mediators to request availability [.6].	1.30	800.00	1,040.00
484812	06/13/2024	BHC	Email to defense counsel regarding stipulation [.1]. Approved same for filing [.1]. Responded to question from attorney general regarding document production [.2]; reviewed ██████████ in preparation for discovery conference [1.2].	1.60	800.00	1,280.00
484822	06/14/2024	BHC	Preliminary review of client deposition transcript [.8]; email to co-counsel regarding same [.1]. Emails to co-counsel and potential mediators seeking availability [.1]. Meet and confer with DCSS counsel regarding subpoena and public records request [.4]; follow up email regarding same [.1]. Email to all counsel regarding potential dates for mediation [.3].	1.80	800.00	1,440.00
484951	06/17/2024	BHC	Email to client regarding deposition transcripts [.1].	0.10	800.00	80.00

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485352	06/20/2024	BHC	Exchanged emails with defense counsel regarding mediation and deposition scheduling [.1].	0.10	800.00	80.00
487606	07/09/2024	BHC	Exchanged multiple emails with co-counsel, defense counsel, and potential mediators regarding mediation [.3].	0.30	800.00	240.00
487616	07/11/2024	BHC	Exchanged emails with potential mediators and defense counsel regarding mediation [.2].	0.20	800.00	160.00
487449	07/15/2024	BHC	Worked on mediation scheduling [.3].	0.30	800.00	240.00
487461	07/16/2024	BHC	Email to defense counsel regarding case status and outstanding discovery and possible mediation [.3]. Read and revised draft motion for class certification [.7].	1.00	800.00	800.00
486912	07/17/2024	BHC	Worked with co-counsel on proposed stipulation to extend case schedule [.1].	0.10	800.00	80.00
487620	07/18/2024	BHC	Email to defense counsel regarding proposed stipulation on schedule [.1]. Telephone call from defense counsel regarding case schedule and mediation [.1]; approved filing stipulation regarding case schedule [.1].	0.30	800.00	240.00
486923	07/19/2024	BHC	Telephone call with client regarding mediation [.2].	0.20	800.00	160.00
487263	07/25/2024	BHC	Telephone conference with mediator [.4]; follow up email providing pleadings and orders [.3]. Worked with co-counsel on mediation strategy [.2].	0.90	800.00	720.00
489223	08/02/2024	BHC	Reviewed fully executed mediation agreement and sent same to filing [.1].	0.10	800.00	80.00
489265	08/14/2024	BHC	Discussed drafting mediation submission and associate work with co-counsel [.2]; email with examples and outline of assignment for mediation submission to associate [.8].	1.00	800.00	800.00
489933	08/15/2024	BHC	Worked with co-counsel on issues related to mediation submission [.2]. Email to attorney general regarding document production [.1]	0.30	800.00	240.00
488923	08/16/2024	BHC	Meet and confer with California AG regarding subpoena and PRR [.2]. Discussed mediation submission with co-counsel [.3].	0.50	800.00	400.00
489574	08/20/2024	BHC	Responded to email from mediator regarding scheduling [.1].	0.10	800.00	80.00
489199	08/21/2024	BHC	Drafted letter to defense counsel with [REDACTED] [1.8].	1.80	800.00	1,440.00
489297	08/22/2024	BHC	Sent ER 408 letter regarding [REDACTED] [.2].	0.20	800.00	160.00
489949	08/27/2024	BHC	Email to co-counsel regarding mediation submission section on [REDACTED] [3]	0.30	800.00	240.00
490349	09/04/2024	BHC	Worked on mediation submission [1.5]. Worked on mediation submission [.4].	1.90	800.00	1,520.00
490875	09/09/2024	BHC	Worked on mediation submission [.3]. Exchanged multiple emails with defense counsel and mediator's assistant regarding mediation schedule [.3].	0.60	800.00	480.00
491755	09/16/2024	BHC	Email to defense counsel regarding stipulation to extend case schedule in light of extended mediation date [.1]. Worked on case management and strategy in light of mediation change [.2].	0.30	800.00	240.00
491768	09/18/2024	BHC	Reviewed defense revisions to stipulation to extend case schedule [.1]; email to co-counsel regarding same [.1].	0.20	800.00	160.00
491775	09/27/2024	BHC	Email to co-counsel regarding motion for class certification [.1].	0.10	800.00	80.00
494566	10/01/2024	BHC	Worked on issue related to case scheduling deadlines with associate [.4].	0.40	800.00	320.00

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494581	10/02/2024	BHC	Exchanged emails with associate regarding follow up on subpoena to state agency [.1].	0.10	800.00	80.00
494607	10/04/2024	BHC	Email confirming pre-mediation call with Judge Linares [.1].	0.10	800.00	80.00
492885	10/14/2024	BHC	Exchanged emails with co-counsel regarding California public records request response [.1].	0.10	800.00	80.00
493656	10/28/2024	BHC	Worked on confidential mediation submission [1.5].	1.50	800.00	1,200.00
493775	10/31/2024	BHC	Worked on issues related to mediation [.4].	0.40	800.00	320.00
494063	11/04/2024	BHC	Telephone call with client regarding mediation [.3].	0.30	800.00	240.00
494381	11/07/2024	BHC	Worked on draft settlement agreement for mediation and mediation worksheet with different settlement valuations.	3.50	800.00	2,800.00
494391	11/07/2024	BHC	Analyzed defendants' mediation submission; legal research based on arguments in same [1.2].	1.20	800.00	960.00
494683	11/08/2024	BHC	Meeting with co-counsel to prepare for mediation [1]. Telephone call with mediator in advance of mediation [.6]; follow up email to counsel team summarizing same [.3]. Call with co-counsel regarding and mediation [.1].	2.00	800.00	1,600.00
494695	11/09/2024	BHC	Drafted term sheet [.4].	0.40	800.00	320.00
494724	11/11/2024	BHC	Mediation [6.6].	6.60	800.00	5,280.00
494815	11/12/2024	BHC	Worked on motion for class certification [2.1]. Worked with staff on scheduling court reporters for noticed depositions [.2]. Email to co-counsel regarding discovery management [.3].	2.60	800.00	2,080.00
494913	11/13/2024	BHC	Drafted section of motion for class certification addressing data and expert report [1.9]. Worked on deposition scheduling and strategy with co-counsel [.8]. Exchanged multiple emails with defense counsel regarding class certification briefing schedule [.3]. Follow up work with co-counsel on deposition scheduling [.2]. Telephone call with mediator [.1]. Videoconference with co-counsel regarding Carl Pry deposition [.3].	3.60	800.00	2,880.00
495481	11/14/2024	BHC	Worked on motion for class certification; sent same to all co-counsel [2.5]. Email to defense counsel regarding exhibits to class certification motion that are designated confidential [.2].	2.70	800.00	2,160.00
495101	11/18/2024	BHC	Telephone conference with co-counsel regarding motion for class certification and settlement discussion with mediator [.3].	0.30	800.00	240.00
495116	11/19/2024	BHC	Telephone call with co-counsel regarding settlement offer [.2]; follow up call with co-counsel regarding same [.3].	0.50	800.00	400.00
495164	11/19/2024	BHC	Worked on motion for class certification [1.8]. Reviewed Rios declaration supporting motion for class certification [.2].	2.00	800.00	1,600.00
495510	11/20/2024	BHC	Telephone call with defense counsel regarding potential settlement [.2]; reviewed data relating to same [.6].; exchanged multiple emails with co-counsel regarding same [.4]. Worked with staff on exhibits to class certification motion [.3]. Correspondence to defense counsel regarding deposition schedule [.2].	1.70	800.00	1,360.00

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495488	11/21/2024	BHC	Worked with staff and associate on confidential and de-designated exhibits to class certification motion and sealing motion [.2]. Worked with staff on creating exhibit transcription of call recording [.3]. Email to co-counsel regarding settlement status [.1]. Worked on declaration and exhibits supporting motion for class certification [1.5].	2.10	800.00	1,680.00
495612	11/25/2024	BHC	Telephone call with Mr. Tack-Hooper to discuss Pry deposition [.3]. Worked on discovery matters [.4].	0.70	800.00	560.00
495649	11/26/2024	BHC	Telephone calls with co-counsel regarding deposition schedule [.4]. Telephone call with defense counsel regarding settlement negotiations and deposition schedule [.2]. Reviewed email from defense counsel regarding deposition schedule; discussed same with co-counsel [.4].	1.00	800.00	800.00
496767	12/04/2024	BHC	Worked on stipulation regarding Rule 30(b)(6) deposition topics [.4]; sent same to defense counsel with proposal for withdrawing some topics per stipulation [.1]. Email to defense counsel regarding missing documents [.8]. Email to defense counsel regarding identifying designees for each topic [.2]. Worked with co-counsel on settlement issues [.1].	1.60	800.00	1,280.00
496823	12/05/2024	BHC	Telephone call with client regarding case status and settlement negotiations [.5]. Discussed Pry deposition issues with co-counsel [.4].	0.90	800.00	720.00
496826	12/05/2024	BHC	Worked on 30(b)(6) deposition outline [4.6]. Worked with staff on deposition scheduling logistics [.2].	4.80	800.00	3,840.00
496885	12/06/2024	BHC	Worked on Rule 30(b)(6) deposition outline and exhibit preparation [3.5]. Telephone calls with Mr. Grugan regarding Conduent settlement offer [.2]	3.70	800.00	2,960.00
497070	12/09/2024	BHC	Worked on stipulated motion to extend discovery cutoff [.9]. Email to defense counsel regarding overdue document production [.1]. Reviewed documents in preparation for depositions [.6].	1.60	800.00	1,280.00
497135	12/10/2024	BHC	Reviewed defense edits to proposed stipulation; telephone calls to co-counsel regarding same; email to defense counsel rejecting proposal to extend class certification briefing deadlines [.6]. Telephone call with co-counsel regarding depositions and case management [.3].	0.90	800.00	720.00
497963	12/12/2024	BHC	Reviewed mediation invoice; sent same for payment [.1].	0.10	800.00	80.00
497739	12/13/2024	BHC	Worked on term sheet [.8]; worked with co-counsel on same [.6]; revised term sheet and sent same to defense counsel [.4].	1.80	800.00	1,440.00
497969	12/20/2024	BHC	Video conference with co-counsel regarding settlement strategy [.6]. Worked on stipulation regarding case schedule and approved same for filing [.3]. Exchanged emails with defense counsel regarding settlement call [.2]. Worked with Ms. Nuss on data analysis relating to settlement; email to co-counsel regarding same [.5].	1.60	800.00	1,280.00
498016	12/27/2024	BHC	Telephone call with defense counsel and co-counsel regarding settlement negotiations [.3]; follow up call with co-counsel regarding same [.1].	0.40	800.00	320.00
502198	01/02/2025	BHC	Exchanged emails with defense counsel regarding settlement data [.1].	0.10	800.00	80.00
499078	01/08/2025	BHC	Email to Mr. Grugan regarding data to be produced under ER 408 [.1]; reviewed same and provided to expert with directions for analysis [.6].	0.70	800.00	560.00

Trans No	Date	Prof	Narrative	Units	Price	Value
499073	01/09/2025	BHC	Reviewed expert data analysis and identified issue with same; reviewed orders to evaluate potential settlement options [1.3].	1.30	800.00	1,040.00
499072	01/10/2025	BHC	Videoconference with expert regarding ER 408 data analysis [.2]. Exchanged emails with defense counsel regarding settlement discussion status [.1].	0.30	800.00	240.00
499170	01/13/2025	BHC	Worked with staff on review of data analysis from expert in order to make further settlement offer [.4]; videoconference with co-counsel regarding further settlement offer [.5].	0.90	800.00	720.00
500211	01/15/2025	BHC	Email to defense counsel regarding proposed stay pending settlement [.1]. Worked on issues related to supplemental data analysis for settlement [.3]	0.40	800.00	320.00
499324	01/16/2025	BHC	Telephone call with defense counsel regarding settlement [.3]. Worked on settlement agreement [1.8].	2.10	800.00	1,680.00
502207	01/17/2025	BHC	Reviewed stipulation to extend case schedule and approved signature and filing of same [.2]. Revised draft settlement agreement and same to co-counsel and defense counsel [.6].	0.80	800.00	640.00
502210	01/22/2025	BHC	Video conference with co-counsel regarding class notices [.5]. Email to defense counsel regarding outstanding discovery matters [.3].	0.80	800.00	640.00
502215	01/23/2025	BHC	Worked on settlement agreement based on revisions and comments from co-counsel; email memo to co-counsel regarding same [.6].	0.60	800.00	480.00
502236	01/30/2025	BHC	Worked on settlement notices; sent same to co-counsel with memo on revisions to settlement agreement [1.4].	1.40	800.00	1,120.00
500188	01/31/2025	BHC	Worked on revised class notices [.4]; telephone call with co-counsel regarding letter to people with high dollar claims [.2]. Sent updated settlement agreement and all exhibits with cover memo regarding revisions to defense counsel [.4].	1.00	800.00	800.00
502073	02/14/2025	BHC	Email to defense counsel regarding status of settlement agreement review [.1].	0.10	800.00	80.00
502569	03/04/2025	BHC	Worked on stipulation to extend case deadlines [.2]. Drafted and sent administration bid requests for proposal [.5].	0.70	800.00	560.00
502702	03/05/2025	BHC	Responded to administrator follow up questions and reviewed first bid [.1]. Responded to additional administrator questions [.2]. Reviewed administration bids [.5].	0.80	800.00	640.00
502913	03/07/2025	BHC	Videoconference with defense counsel regarding settlement agreement and administration [.5].	0.50	800.00	400.00
503634	03/19/2025	BHC	Discussed issues related to draft settlement agreement with defense counsel [.4].	0.40	800.00	320.00
503631	03/20/2025	BHC	Worked on settlement agreement and class notices in response to defense comments and revisions [2.1].	2.10	800.00	1,680.00
503720	03/21/2025	BHC	Worked on Plaintiff's revisions to settlement agreement; sent same to defense counsel [.9].	0.90	800.00	720.00
504774	04/03/2025	BHC	Worked with co-counsel on motion for preliminary approval of settlement [.5].	0.50	800.00	400.00
505152	04/09/2025	BHC	Email to defense counsel regarding completing settlement agreement [.1].	0.10	800.00	80.00
505329	04/13/2025	BHC	Email to defense counsel regarding settlement agreement [.1].	0.10	800.00	80.00
505507	04/15/2025	BHC	Email correspondence with defense counsel regarding settlement agreement [.1]. Worked on motion for preliminary approval [1.3].	1.40	800.00	1,120.00

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505763	04/17/2025	BHC	Worked on settlement agreement and data analysis related to same [.6].	0.60	800.00	480.00
505817	04/21/2025	BHC	Telephone call with co-counsel regarding settlement agreement [.3]. Worked on data analysis issues relating to settlement [.5]. Videoconference with defense counsel regarding settlement agreement; revised same in light of discussion [.8].	1.60	800.00	1,280.00
506159	04/23/2025	BHC	Telephone call with defense counsel regarding settlement class data [.4]. Follow up data analysis work with staff and email summarizing same [.6]; email to defense counsel regarding same [.1].	1.10	800.00	880.00
506985	04/28/2025	BHC	Telephone call with defense counsel regarding class settlement [.2].	0.20	800.00	160.00
506365	04/29/2025	BHC	Discussed settlement agreement and final class list with defense counsel [.2]. Revised settlement agreement in light of discussion and sent same to all counsel [.8]; email to co-counsel regarding same [.1]. Email to administrator and all counsel regarding CAFA deadlines and notice [.2]. Email to court withdrawing motion to compel [.1]. Worked on settlement notices [.4].	1.80	800.00	1,440.00
506970	05/06/2025	BHC	Videoconference with defense counsel regarding settlement class data [.5]. Follow up work on data issues with staff; email to defense counsel regarding same [.5]. Final review of settlement agreement and sent to client to sign [.7]. Email to settlement administrator regarding proposed class notices and CAFA notice [.2].	1.90	800.00	1,520.00
507078	05/07/2025	BHC	Reviewed signed settlement agreement and exhibits [.2]; sent same to defense counsel [.1].	0.30	800.00	240.00
507366	05/12/2025	BHC	Email to settlement administrator regarding case status [.1].	0.10	800.00	80.00
509519	05/14/2025	BHC	Reviewed final settlement agreement with defense signature worked with staff on assembling with client signature and exhibits [.2]. Email to administrator regarding expected preliminary approval filing and CAFA notice date [.2].	0.40	800.00	320.00
507546	05/15/2025	BHC	Worked on final review of preliminary approval papers [.5]. Email to client regarding filed motion for preliminary approval [.3]. Sent filed preliminary approval papers to administrator [.1].	0.90	800.00	720.00
507646	05/16/2025	BHC	Revised notice of withdrawal of class certification motion and approved same for filing [.1].	0.10	800.00	80.00
511699	06/16/2025	BHC	Email to defense counsel on request to hold preliminary approval hearing via Zoom [.1].	0.10	800.00	80.00
510136	06/18/2025	BHC	Drafted stipulated motion to hold preliminary approval hearing remotely [.3]; reviewed revisions to same and circulated to all counsel [.1]. Reviewed and approved stipulation regarding Zoom appearance for filing [.1].	0.50	800.00	400.00
513252	07/31/2025	BHC	Video conference with settlement administrator regarding court order [.4]. Worked on declarations for resubmission of proposed class notices [1.2]. Email to defense counsel providing revised settlement notices [.2].	1.80	800.00	1,440.00
513247	08/01/2025	BHC	Worked on declaration and response to court order regarding use of digital Mastercard [1].	1.00	800.00	800.00
513343	08/04/2025	BHC	Worked with administrator and supplemental declaration regarding electronic Mastercard payments [.1].	0.10	800.00	80.00

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513391	08/04/2025	BHC	Worked on revised declarations and notice regarding electronic mastercard payments [.6].	0.60	800.00	480.00
514234	08/11/2025	BHC	Reviewed order from court on prepaid card payment option and sent request to co-counsel to review notices in light of same [.2].	0.20	800.00	160.00
514286	08/12/2025	BHC	Worked on settlement notices per court order; drafted declaration regarding notices and approved same for filing [1.2].	1.20	800.00	960.00
514442	08/13/2025	BHC	Read order granting preliminary approval and sent all deadlines to docketing [.3].	0.30	800.00	240.00
514636	08/18/2025	BHC	Email to administrator regarding settlement deadlines, notices and class list [.2]. Worked with staff on getting complete class list with damages amounts to administrator [.1].	0.30	800.00	240.00
515410	08/26/2025	BHC	Reviewed settlement website; email to administrator regarding same [.5].	0.50	800.00	400.00
515275	08/27/2025	BHC	Reviewed and revised class notices from administrator [1].	1.00	800.00	800.00
515338	08/28/2025	BHC	Email to settlement administrator regarding notice revisions [.3].	0.30	800.00	240.00
516551	09/15/2025	BHC	Worked on website and Spanish notice translation issue [.1].	0.10	800.00	80.00
Statement Professional: Blythe H. Chandler				358.60		286,880.00
Statement Professional: Heather Brown						
454816	03/28/2023	HB	Worked on organizing case files [.3].	0.30	330.00	99.00
455852	04/05/2023	HB	Downloaded and organized client documents [.2].	0.20	330.00	66.00
456877	04/27/2023	HB	Worked on sending summons and complaint out for process service [.6].	0.60	330.00	198.00
457323	05/05/2023	HB	Followed up on process service of complaint [.2].	0.20	330.00	66.00
458401	05/17/2023	HB	Processed affidavit of service on Comerica [.3].	0.30	330.00	99.00
458792	05/23/2023	HB	Processed affidavit of process service [.2].	0.20	330.00	66.00
461040	06/26/2023	HB	Worked on declaration and exhibit in support of response to motion to dismiss [1.0].	1.00	330.00	330.00
463976	08/03/2023	HB	Worked on docketing [.1].	0.10	330.00	33.00
463983	08/04/2023	HB	Processed client documents for production [2.1].	2.10	330.00	693.00
465044	08/18/2023	HB	Processed client documents [.2].	0.20	330.00	66.00
467291	09/22/2023	HB	Created Ipro database and processed plaintiffs initial disclosures production [.5].	0.50	330.00	165.00
467517	09/26/2023	HB	Worked on formatting exhibit for response to motion to dismiss [.3].	0.30	330.00	99.00
467763	09/28/2023	HB	Prepared exhibit in support of opposition to motion to dismiss [.1].	0.10	330.00	33.00
468250	10/09/2023	HB	Processed client documents for production [.5]; Performed research regarding [REDACTED] [.8].	1.30	330.00	429.00
468325	10/10/2023	HB	Look into accessing court documents, prepared letter regarding same [.8].	0.80	330.00	264.00
468500	10/11/2023	HB	Teleconference regarding client document redactions [.3]; Finalized letter to Santa Clara County Court for documents [.3].	0.60	330.00	198.00
468511	10/12/2023	HB	Worked on redacting client documents [2.0].	2.00	330.00	660.00
468515	10/13/2023	HB	Finalized redactions of client documents [.3].	0.30	330.00	99.00
468826	10/16/2023	HB	Exchanged emails with team regarding document production [.2].	0.20	330.00	66.00

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468830	10/17/2023	HB	Processed client documents for production [.7].	0.70	330.00	231.00
468833	10/18/2023	HB	Finalized client documents for production [.8].	0.80	330.00	264.00
469207	10/23/2023	HB	Worked on letter to court regarding document request [.5].	0.50	330.00	165.00
469569	11/01/2023	HB	Processed defendant's document production [.5].	0.50	330.00	165.00
469719	11/02/2023	HB	Reviewed documents and updated production log with defendant's production [.3].	0.30	330.00	99.00
470008	11/06/2023	HB	Worked on docketing deadlines [.1].	0.10	330.00	33.00
470017	11/07/2023	HB	Worked on organizing client documents folder [.2].	0.20	330.00	66.00
470028	11/09/2023	HB	Review documents from Santa Clara Court; emailed team re same [.3]; Prepared documents for production [.4].	0.70	330.00	231.00
470351	11/13/2023	HB	Process and serve plaintiff document production [.9].	0.90	330.00	297.00
470366	11/16/2023	HB	Processed defendant's document production and worked on troubleshooting issues loading into lpro [1.3].	1.30	330.00	429.00
470533	11/20/2023	HB	Process defendants' document production [.7]; Gather call recordings for client [.2].	0.90	330.00	297.00
470541	11/21/2023	HB	Sent call recordings to client via ShareFile [.2].	0.20	330.00	66.00
475151	01/29/2024	HB	Processed defendant's document production [.5].	0.50	330.00	165.00
476443	02/23/2024	HB	Pulled document from lpro for team [.1].	0.10	330.00	33.00
476952	02/27/2024	HB	Set up case and deposition in Agile [.2].	0.20	330.00	66.00
477612	03/05/2024	HB	Worked on loading potential deposition exhibits into Agile [.6].	0.60	330.00	198.00
477620	03/06/2024	HB	Worked on potential deposition exhibits in Agile [.3].	0.30	330.00	99.00
477964	03/11/2024	HB	Gathered and transmitted relevant documents to expert [.4].	0.40	330.00	132.00
478200	03/12/2024	HB	Logged expert production [.2].	0.20	330.00	66.00
478845	03/19/2024	HB	Processed incoming deposition transcript and exhibits [.5]; Processed defendant's document production [.7].	1.20	330.00	396.00
478851	03/20/2024	HB	Processed incoming deposition transcript [.3]; Transmitted deposition transcript to cocounsel and expert [.2].	0.50	330.00	165.00
480158	03/26/2024	HB	Processed incoming deposition files [.3].	0.30	330.00	99.00
480168	03/29/2024	HB	Processed defendant's document production [.4]; Worked on meet and confer letter insert [.8].	1.20	330.00	396.00
480798	04/17/2024	HB	Gathered deposition transcripts and exhibits and transmitted same to client via ShareFile [.5].	0.50	330.00	165.00
481052	04/18/2024	HB	Processed defendant's document production [.5]; Sent same to Expert [.5].	1.00	330.00	330.00
481604	05/01/2024	HB	Processed incoming client documents [.2].	0.20	330.00	66.00
481858	05/03/2024	HB	Processed incoming client documents [.2].	0.20	330.00	66.00
482175	05/06/2024	HB	Processed client documents for production [.5].	0.50	330.00	165.00
482186	05/08/2024	HB	Worked on setting up depositions in Agile [.2].	0.20	330.00	66.00
482313	05/09/2024	HB	Processed defendant's document production [.5]; Reviewed defendant's document production [.3].	0.80	330.00	264.00

Trans No	Date	Prof	Narrative	Units	Price	Value
482404	05/10/2024	HB	Processed incoming client documents [.1]; Assisted in deposition preparation [1.7].	1.80	330.00	594.00
482643	05/13/2024	HB	Processed defendant's document production [.2]; Worked on deposition preparation [.8].	1.00	330.00	330.00
483102	05/14/2024	HB	Worked on deposition preparation [1.5]; Processed defendant's document production [.3]; Process client documents into lpro [.2].	2.00	330.00	660.00
483109	05/15/2024	HB	Worked on deposition preparation [.4].	0.40	330.00	132.00
483112	05/16/2024	HB	Reviewed public records request and document subpoena requirements for third party [.3].	0.30	330.00	99.00
483119	05/17/2024	HB	Processed client documents into lpro [.4].	0.40	330.00	132.00
483124	05/17/2024	HB	Serviced expert report on parties [.5].	0.50	330.00	165.00
483471	05/20/2024	HB	Worked on exhibit to discovery letter [.4].	0.40	330.00	132.00
483475	05/21/2024	HB	Worked on preparing client documents for productions [2.3]; Worked on case management [.2].	2.50	330.00	825.00
483486	05/23/2024	HB	Worked on preparing client documents for production [6.3].	6.30	330.00	2,079.00
483489	05/24/2024	HB	Worked on preparing client documents for production [3.6]; Processed incoming deposition transcripts and exhibits [.2].	3.80	330.00	1,254.00
483752	05/29/2024	HB	Processed incoming deposition video files [.2].	0.20	330.00	66.00
483755	05/30/2024	HB	Processed defendant's document production [.6].	0.60	330.00	198.00
483760	05/31/2024	HB	Processed incoming deposition transcript and exhibits [.2].	0.20	330.00	66.00
484436	06/03/2024	HB	Processed defendant's document production [.3]; Processed plaintiff's reproduction [.8].	1.10	330.00	363.00
484522	06/06/2024	HB	Processed incoming video deposition files [.1].	0.10	330.00	33.00
484529	06/07/2024	HB	Processed defendant's document production [.2].	0.20	330.00	66.00
484848	06/14/2024	HB	Processed incoming deposition transcript and exhibits [.2].	0.20	330.00	66.00
485504	06/17/2024	HB	Gathered and sent deposition transcripts to client [.4].	0.40	330.00	132.00
485758	06/25/2024	HB	Processed defendant's document productions [.4].	0.40	330.00	132.00
486968	07/17/2024	HB	Worked on exhibits in support of motion for class certification [2.4].	2.40	330.00	792.00
486972	07/18/2024	HB	Worked on exhibits in support of motion for class certification [1.0]; Removed defendant's 5/30 production from lpro [.3].	1.30	330.00	429.00
492870	10/14/2024	HB	Processed third party document production [.7].	0.70	330.00	231.00
495227	11/13/2024	HB	Reviewed exhibits in support of motion for class certification for confidentiality, emailed team regarding same [.5].	0.50	330.00	165.00
495239	11/14/2024	HB	Exchanged communications regarding database migration project [.3].	0.30	330.00	99.00
495297	11/18/2024	HB	Gathered and transmitted deposition transcripts and exhibits to cocounsel [.4].	0.40	330.00	132.00
495386	11/20/2024	HB	Worked on motion for class certification [4.4].	4.40	330.00	1,452.00
495390	11/21/2024	HB	Worked on motion for class certification [6.3].	6.30	330.00	2,079.00
495462	11/22/2024	HB	Worked on motion for class certification [.8]	0.80	330.00	264.00
497059	12/05/2024	HB	Worked on deposition preparation [.2].	0.20	330.00	66.00

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497067	12/06/2024	HB	Worked on deposition preparation [.3].	0.30	330.00	99.00
506525	04/30/2025	HB	Worked on closing out Disco database [.4].	0.40	330.00	132.00
511621	07/07/2025	HB	Worked on exhibits in support of motion for preliminary approval [.7].	0.70	330.00	231.00
Statement Professional: Heather Brown				68.80		22,704.00
Statement Professional: Jasmin Rezaie						
464005	08/02/2023	JR	Telephone conference with co-counsel regarding drafting first set of discovery requests [.2]; followed up with same [.6]; drafted first set of discovery requests [4.2]; drafted initial disclosures [.1].	5.10	500.00	2,550.00
464012	08/03/2023	JR	Reviewed final discovery to serve on Defendants [.2].	0.20	500.00	100.00
464016	08/04/2023	JR	Telephone conference with co-counsel regarding case management [.1]; email correspondence regarding production of documents to serve with initial disclosures [.2]; drafted initial disclosures [2.2]; continued the same [1.9]; continued drafting initial disclosures [.3]; reviewed documents for production [.4]; email correspondence to co-counsel regarding production of documents [.1]; conducted final review of documents and confidential information [.6].	5.80	500.00	2,900.00
464759	08/09/2023	JR	Evaluated and reviewed proposed edits to Joint Case Management Statement [1.1]; drafted and revised Joint Case Management Report [.5]; email correspondence to co-counsel regarding the same [.3]; reviewed documents for production with initial disclosures [.8]; telephone conference with co-counsel regarding proposed changes to Joint Case Management Report [.1]; drafted email correspondence to opposing counsel regarding proposed updates to Joint Case Management Report [.2]; exchanged email correspondence with co-counsel regarding service of initial disclosures and Joint Case Management Report [.2]; worked on case management regarding finalizing and serving initial disclosures [.1]; exchanged email correspondence with opposing counsel regarding proposed edits to JSR [.2]; revised and finalized initial disclosures for service [.6]; drafted email correspondence to opposing counsel serving initial disclosures and documents [.3]; reviewed and finalized Joint Case Management Report for filing [1.2].	5.60	500.00	2,800.00
465080	08/16/2023	JR	Email correspondence with co-counsel regarding case management hearing [.1]; attended case management hearing on zoom and took notes [.5]; finalized notes from case management hearing [.3].	0.90	500.00	450.00
466986	09/11/2023	JR	Reviewed discovery requests from Defendant [.2].	0.20	500.00	100.00
467000	09/14/2023	JR	Reviewed and analyzed discovery requests from Defendant [1.2]; email correspondence to co-counsel regarding drafting discovery responses [.1].	1.30	500.00	650.00
467221	09/20/2023	JR	Evaluated and analyzed Defendants first set of discovery requests [.4]; video conference with co-counsel regarding responding to discovery requests [.6]; worked on case management regarding drafting discovery responses [.1]; exchanged email correspondence regarding discovery responses [.2].	1.30	500.00	650.00

Trans No	Date	Prof	Narrative	Units	Price	Value
467334	09/21/2023	JR	Evaluated and analyzed case strategy and Ms. Sparkman's documents [1.7]; drafted list of questions for Ms. Sparkman regarding Defendants interrogatories and requests for production [2.4].	4.10	500.00	2,050.00
467340	09/22/2023	JR	Drafted questions to send Ms. Sparkman regarding Defendants' interrogatories and requests for production [1.2]; continued drafting the same [3.2]; drafted responses to Defendants' interrogatories and requests for production [.8].	5.20	500.00	2,600.00
467734	09/25/2023	JR	Email correspondence with co-counsel regarding interrogatory and request for production questions for Ms. Sparkman [.2]; drafted responses and objections to Defendants' interrogatories and requests for production [2.2]; continued drafting the same [2.0].	4.40	500.00	2,200.00
468274	10/02/2023	JR	Prepared questions for meeting with Ms. Sparkman regarding drafting discovery responses [.3]; telephone conference with Ms. Sparkman regarding her answers and responses to discovery [.9].	1.20	500.00	600.00
468280	10/04/2023	JR	Drafted Ms. Sparkman's responses to interrogatories [2.7]; conducted legal research regarding [REDACTED] [1.2]; continued the same [1.0].	4.90	500.00	2,450.00
468533	10/06/2023	JR	Drafted Ms. Sparkman's responses to requests for production [.5]; reviewed Defendants' discovery responses [.5]; drafted email correspondence to Defendants regarding deficiencies with Defendants' discovery responses and production of Defendants' documents [.6]; continued drafting Ms. Sparkman's responses to request for production and interrogatories [1.8]; continued the same [.7].	4.10	500.00	2,050.00
468538	10/09/2023	JR	Evaluated and analyzed documents sent from Ms. Sparkman [.3]; exchanged emails with Ms. Sparkman regarding outstanding documents and setting up a meeting regarding discovery responses [.4]; exchanged emails with staff regarding preparing documents for production and making redactions [.4]; strategy conference with co-counsel regarding preparing discovery responses and documents for production [.3]; continued drafting and revising discovery responses [2.1]; drafted list of questions for Ms. Sparkman regarding discovery responses [.5]; evaluated and analyzed documents to produce in discovery [.2].	4.20	500.00	2,100.00
468543	10/10/2023	JR	Telephone conference with Ms. Sparkman regarding answers to her discovery responses [.5]; drafted and revised discovery responses [1.6]; continued the same [.7]; drafted email correspondence to staff regarding redacting Ms. Sparkman's documents for production [.2].	3.00	500.00	1,500.00
468547	10/11/2023	JR	Email to Ms. Sparkman regarding documents to produce in discovery [.1]; email from Defendants regarding production of documents and scheduling a time to meet and confer [.1]; video conference with staff regarding redacting Ms. Sparkman's documents and finalizing production [.5]; exchanged emails regarding instructions for redacting documents [.2]; revised and drafted discovery responses [1.0]; drafted meet and confer letter [1.2].	3.10	500.00	1,550.00

Trans No	Date	Prof	Narrative	Units	Price	Value
468881	10/12/2023	JR	Email to Ms. Sparkman regarding documents to produce in discovery [.1]; exchanged emails with co-counsel regarding status of production of documents [.2]; reviewed documents for production with discovery and tagged privileged documents [.6].	0.90	500.00	450.00
468884	10/13/2023	JR	Reviewed documents to be produced with discovery responses [.5]; exchanged emails with co-counsel regarding final redactions of documents to be produced [.2]; email to staff regarding final redactions and production of documents [.1]; revised and drafted discovery responses and incorporated co-counsel's revisions [.4].	1.20	500.00	600.00
468609	10/16/2023	JR	Prepared for meet and confer with opposing counsel regarding Defendants' production of documents [.1]; met and conferred with opposing counsel regarding Defendants' production of documents and timing of production [.5]; telephone conference with co-counsel regarding meet and confer [.1]; exchanged email with staff regarding formatting production of documents and re-producing Ms. Sparkman's documents [.2].	0.90	500.00	450.00
469320	10/17/2023	JR	Revised Ms. Sparkman's discovery responses with notes from Ms. Sparkman [.8]; drafted email to co-counsel regarding finalized responses and production of documents [.4]; telephone conference with Ms. Sparkman regarding her notes on her discovery responses [.2]; continued revising and finalizing responses with Ms. Sparkman's edits [.9].	2.30	500.00	1,150.00
469331	10/18/2023	JR	Finalized and revised Ms. Sparkman's responses to interrogatories [.3]; exchanged emails with co-counsel and staff regarding finalizing Ms. Sparkman's discovery responses for service [.2]; reviewed final discovery responses for service [.3].	0.80	500.00	400.00
469339	10/19/2023	JR	Reviewed and analyzed Defendants' discovery responses [.3].	0.30	500.00	150.00
469342	10/20/2023	JR	Drafted meet and confer letter to Defendants regarding discovery responses [.8]; continued the same [.6].	1.40	500.00	700.00
469352	10/23/2023	JR	Evaluated and analyzed Defendants' discovery responses and deficiencies [.6]; drafted and outlined meet and confer letter to Defendants regarding the same [2.1]; continued the same [3.0].	5.70	500.00	2,850.00
469366	10/26/2023	JR	Evaluated and analyzed Defendants' discovery responses and deficiencies and outlined meet and confer letter to Defendants regarding the same [1.8]; strategy conference with co-counsel regarding the same [.2].	2.00	500.00	1,000.00
469369	10/27/2023	JR	Continued drafting meet and confer letter to Defendants regarding their discovery responses [4.0].	4.00	500.00	2,000.00
469368	10/28/2023	JR	Finalized and revised meet and confer letter to Defendants regarding deficiencies with discovery responses [.2]; drafted email to co-counsel regarding the same [.2].	0.40	500.00	200.00
469525	10/30/2023	JR	Researched [REDACTED] [.3].	0.30	500.00	150.00
469817	10/31/2023	JR	Revised and finalized meet and confer letter to opposing counsel regarding deficiencies with discovery responses [.9]; reviewed final meet and confer letter to serve on opposing counsel [.3].	1.20	500.00	600.00

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470398	11/09/2023	JR	Worked on case management regarding Defendants' production of documents [.2].	0.20	500.00	100.00
470626	11/13/2023	JR	Reviewed Ms. Sparkman's documents for production to Defendants [.4].	0.40	500.00	200.00
470649	11/16/2023	JR	Analyzed and reviewed Defendants' production of discovery documents [.8].	0.80	500.00	400.00
471134	11/20/2023	JR	Analyzed Defendants production of documents and drafted email memorandum to co-counsel regarding the same in preparation for meet and confer with Defendants [.5]; continued the same [1.4]; met and conferred with opposing counsel regarding issues with discovery responses and production of documents [.5]; drafted email to opposing counsel regarding status of discovery and next steps following the meet and confer and sent to co-counsel [.8]; reviewed documents and calls produced by Defendants [.3].	3.50	500.00	1,750.00
471154	11/21/2023	JR	Revised and sent email to opposing counsel regarding status of discovery and next steps following the meet and confer [.3].	0.30	500.00	150.00
471178	11/30/2023	JR	Drafted updated joint case management statement and sent draft to co-counsel [3.1].	3.10	500.00	1,550.00
472721	12/04/2023	JR	Strategy conference with co-counsel regarding updated joint case management statement [.1]; revised and drafted updated joint case management statement [.4].	0.50	500.00	250.00
472722	12/05/2023	JR	Drafted email to opposing counsel regarding updated joint case management statement and follow up on discovery issues [.7].	0.70	500.00	350.00
472777	12/08/2023	JR	Evaluated and analyzed documents produced by Conduent [.4].	0.40	500.00	200.00
473291	12/12/2023	JR	Evaluated and reviewed Defendant's proposed revisions to the updated joint case management statement [.2].	0.20	500.00	100.00
473193	12/14/2023	JR	Drafted email correspondence to Ms. Sparkman regarding discovery documents [.1]; exchanged discovery strategy correspondence with co-counsel regarding discovery next steps [.2]; evaluated and analyzed Defendants' production of documents and discovery responses [1.1].	1.40	500.00	700.00
473262	12/15/2023	JR	Evaluated and analyzed Defendants' discovery responses and documents, and outstanding discovery issues [1.9]; continued the same and drafted meet and confer letter regarding the same [2.1]; continued the same [1.9].	5.90	500.00	2,950.00
473196	12/28/2023	JR	Evaluated and analyzed Defendants' production of discovery documents and analyzed for missing documents and issues with documents and drafted meet and confer letter to Defendants regarding issues with the same [2.4]; continued the same [3.2].	5.60	500.00	2,800.00
473197	12/29/2023	JR	Evaluated and analyzed audio recordings produced by Defendants [4.1]; evaluated and analyzed Defendants' production of discovery drafted meet and confer letter to Defendants regarding issues with the same [1.4].	5.50	500.00	2,750.00
474800	01/02/2024	JR	Analyzed Defendants' production of documents and discovery responses and drafted meet and confer letter regarding issues with the same and sent to co-counsel for review [4.2].	4.20	500.00	2,100.00

Trans No	Date	Prof	Narrative	Units	Price	Value
475139	01/03/2024	JR	Analyzed email correspondence from co-counsel regarding case strategy, order on motion to dismiss, mediation, outstanding discovery issues, and scheduling strategy conference [.1]; followed up with the same [.2]; drafted second set of discovery requests [.1].	0.40	500.00	200.00
475225	01/04/2024	JR	Strategy conference with co-counsel regarding revision to meet and confer letter and next steps [.2]; exchanged email correspondence with co-counsel regarding the same [.1]; revised and finalized meet and confer letter to opposing counsel regarding outstanding discovery issues to serve [1.1]; analyzed discovery responses and discovery production[.4]; drafted 30(b)(1) deposition notice to Joe Froderman [.3].	2.10	500.00	1,050.00
475231	01/05/2024	JR	Analyzed discovery production and drafted discovery requests to Defendants [.5]; prepared for meeting with co-counsel [.1]; strategy conference with co-counsel regarding order on motion to dismiss and next steps [.5]; telephone conference with Ms. Sparkman regarding the same [.4]; finalized 30(b)(1) notices to John Sanchez and Joe Froderman to serve on opposing counsel and drafted email correspondence to opposing counsel regarding scheduling of depositions [.8].	2.30	500.00	1,150.00
473900	01/10/2024	JR	Drafted email correspondence to co-counsel regarding drafting second set of discovery requests to defendants, ██████████ and next steps [.4]; analyzed documents produced by Defendants in discovery and drafted second set of discovery requests to Defendants [.5].	0.90	500.00	450.00
475245	01/16/2024	JR	Analyzed Defendants' answer to complaint [.5]; exchanged email correspondence with co-counsel regarding Defendants' defenses [.1]; researched and analyzed how to amend complaint to substitute new defendant and drafted email analysis to co-counsel regarding the same [.5].	1.10	500.00	550.00
475249	01/17/2024	JR	Drafted second amended complaint and sent to co-counsel for review [1.4].	1.40	500.00	700.00
475262	01/18/2024	JR	Analyzed email correspondence from opposing counsel regarding stipulation to amend complaint and substitute defendant [.1].	0.10	500.00	50.00
475269	01/19/2024	JR	Analyzed stipulated motion to amend from co-counsel [.1]; conducted legal research regarding ██████████ [.4].	0.50	500.00	250.00
475377	01/22/2024	JR	Analyzed and reviewed outstanding discovery issues and disputes, and prepared agenda in preparation for meet and confer with opposing counsel [1.2]; analyzed Judge Ryu's Standing Order regarding discovery dispute resolution [.2]; analyzed drafted stipulation to substitute parties and amend the complaint [.2]; met and conferred with opposing counsel regarding outstanding discovery issues and outstanding documents [1.1]; followed up with strategy conference with co-counsel regarding next steps [.1]; revised stipulation to substitute parties and amend the complaint and sent to opposing counsel [.2]; drafted summary of Defendants' positions after meet and confer [.2].	3.20	500.00	1,600.00
475389	01/23/2024	JR	Drafted email summary to opposing counsel regarding the parties' positions regarding discovery issues and outstanding discovery documents and information [.6]; exchanged email correspondence with co-counsel regarding the same [.1].	0.70	500.00	350.00

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475390	01/24/2024	JR	Analyzed notes from meet and confer and drafted email summary to opposing counsel regarding the parties' positions regarding discovery issues and outstanding discovery documents and information and sent to co-counsel for review [1.4]; exchanged email correspondence with co-counsel regarding the same [1]; finalized and sent email summary to opposing counsel [2].	1.70	500.00	850.00
474848	01/29/2024	JR	Analyzed and reviewed Defendants' supplemental production of documents and outstanding discovery [9]; reviewed email correspondence from Ms. Sparkman regarding mediation [1].	1.00	500.00	500.00
475275	01/30/2024	JR	Analyzed and reviewed Defendants' supplemental production of documents and drafted email correspondence to co-counsel regarding the same [7].	0.70	500.00	350.00
476799	02/07/2024	JR	Reviewed stipulation to amend complaint [1]; exchanged email correspondence with co-counsel regarding the same [1]; revised stipulation to amend complaint [4]; drafted email correspondence to opposing counsel regarding proposed revisions to the same [1].	0.70	500.00	350.00
476342	02/20/2024	JR	Drafted amended deposition notices to serve [3]; worked with staff to finalize and serve the amended deposition notices [2]; followed up with the same [1].	0.60	500.00	300.00
477161	02/22/2024	JR	Revised amended deposition notices to serve and sent to co-counsel [2]; exchanged email correspondence with Ms. Sparkman regarding upcoming mediation and scheduling [1].	0.30	500.00	150.00
477170	02/23/2024	JR	Prepared for mediation session [2]; attended mediation [7]; analyzed stipulated protective order regarding sending documents [1]; drafted email correspondence to Ms. Sparkman and sent discovery documents to her [3]; telephone conference with co-counsel regarding case strategy, service of the second amended complaint and drafting questions for upcoming depositions [4]; analyzed Defendants' documents and tagged relevant documents for deposition [1]; drafted email correspondence to opposing counsel regarding service of the second amended complaint and agreement regarding the status of service and sent to co-counsel for review [5]; analyzed email correspondence from Ms. Sparkman regarding discovery production and documents [2].	2.50	500.00	1,250.00
476926	02/28/2024	JR	Telephone conference with co-counsel regarding case strategy, upcoming depositions, and updated joint case management statement [2]; drafted deposition outline and questions for deposition of Mr. Froderman and Mr. Sanchez [3.0] drafted updated joint case management statement [3]; continued drafting and revising deposition outline and questions for deposition of Mr. Froderman and Mr. Sanchez [1.1]; followed up with the same [6].	5.20	500.00	2,600.00
477219	02/29/2024	JR	Drafted updated joint case management statement [1.6]; continued the same [4]; drafted deposition questions for the deposition of Joe Froderman and sent to co-counsel [1.4]; analyzed Defendant's answer to the second amended complaint [2].	3.60	500.00	1,800.00
479987	03/04/2024	JR	Finalized joint case management statement and sent draft to co-counsel [5].	0.50	500.00	250.00
479997	03/05/2024	JR	Analyzed final deposition outlines and deposition strategy [3]; drafted letter to the court appointed mediator regarding Plaintiff's position regarding mediation [3.5].	3.80	500.00	1,900.00

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479996	03/06/2024	JR	Drafted letter to the court appointed mediator regarding Plaintiff's position on mediation [.4].	0.40	500.00	200.00
480007	03/07/2024	JR	Drafted letter to the court appointed mediator regarding Plaintiff's position on mediation [.4]; drafted email correspondence to opposing counsel regarding outstanding discovery issues and requesting updates regarding the same and updated joint case management statement [.8]; strategy conference with co-counsel regarding the same [.1].	1.30	500.00	650.00
480013	03/08/2024	JR	Video conference with expert [.6]; sent the signed retainer agreement to the expert [.1]; revised and drafted letter to the court appointed mediator regarding Plaintiff's position on mediation and sent to co-counsel for review [1.7]; exchanged email correspondence with co-counsel regarding the same [.1]; prepared exhibits for mediation letter [.4].	2.90	500.00	1,450.00
479016	03/12/2024	JR	Analyzed deposition notes and compared with second set of discovery requests to Defendants [.6]; strategy conference with co-counsel regarding the same, future depositions, and next steps [.3].	0.90	500.00	450.00
478806	03/20/2024	JR	Analyzed Defendants supplemental production of documents [1.5]; continued the same [.7].	2.20	500.00	1,100.00
478996	03/22/2024	JR	Analyzed Defendant's supplemental production of documents and drafted email correspondence to co-counsel regarding deficiencies with the same and outstanding discovery issues [1.3]; analyzed email correspondence from co-counsel regarding the same [.1].	1.40	500.00	700.00
479130	03/25/2024	JR	Strategy conference with co-counsel regarding discovery issues and next steps [.1]; analyzed email correspondence from opposing counsel regarding the status of outstanding discovery issues and production timeline [.2]; drafted deposition outline for the deposition of Chris Carter [.2]; drafted deposition outline for the deposition of Amy Davis [.1]; drafted deposition outline for the deposition of Jonathan Opelt [.1].	0.70	500.00	350.00
479962	03/27/2024	JR	Analyzed deposition transcripts for Joe Froderman and John Sanchez and drafted deposition outlines for Chris Carter, Jonathan Opelt and Amy Davis [2.1]; drafted email correspondence to co-counsel regarding the same and case strategy [.4]; continued drafting outlines [1.5].	4.00	500.00	2,000.00
479965	03/28/2024	JR	Analyzed discovery case strategy and drafted deposition outlines for Chris Carter, Jonathan Opelt and Amy Davis [1.2]; video conference with expert [.8]; analyzed data and documents produced by Defendants [.2]; email correspondence with co-counsel regarding the same and deposition outline case strategy [.2]; strategy conference with co-counsel regarding deposition strategy and outlines, and upcoming deadlines [.3]; analyzed email correspondence from opposing counsel regarding upcoming deposition dates and production of supplemental discovery [.1]; continued drafting deposition outlines [.2].	3.00	500.00	1,500.00

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480017	04/03/2024	JR	Analyzed email correspondence from opposing counsel regarding scheduling depositions [.1]; exchanged email correspondence with co-counsel regarding the same [.1]; met and conferred with opposing counsel regarding outstanding discovery issues and scheduling depositions [.4]; analyzed Defendants' supplemental production of documents [1.0]; drafted email correspondence to co-counsel regarding the same and supplemental discovery responses [.4].	2.00	500.00	1,000.00
480021	04/04/2024	JR	Met and conferred with opposing counsel regarding scheduling depositions and amending expert deadlines [.1]; drafted email correspondence to co-counsel regarding discovery strategy and Plaintiff's need to supplement her discovery responses [.4]; exchanged email correspondence with co-counsel regarding the same [.1]; case strategy conference with co-counsel regarding deposition schedules and next steps [.1].	0.70	500.00	350.00
481500	04/18/2024	JR	Analyzed upcoming deadlines and drafted email correspondence co-counsel regarding case management, case strategy and next steps [.3].	0.30	500.00	150.00
481238	04/22/2024	JR	Strategy conference with co-counsel regarding drafting responses to Comerica's first set of discovery requests to Ms. Sparkman and case management [.2]; analyzed Comerica's first set of requests to Ms. Sparkman [.2].	0.40	500.00	200.00
481141	04/23/2024	JR	Analyzed Defendant's discovery requests to Ms. Sparkman [.9]; conducted legal research regarding responses and objections to the same [2.1]; drafted objections to discovery requests [1.0].	4.00	500.00	2,000.00
481137	04/24/2024	JR	Analyzed Comerica's first set of discovery requests to Ms. Sparkman [.4]; continued the same and compiled list of questions and documents to discuss with Ms. Sparkman [1.2]; drafted email correspondence to Ms. Sparkman regarding the same [.4]; drafted email correspondence to co-counsel regarding the same and case strategy [.2].	2.20	500.00	1,100.00
481225	04/26/2024	JR	Drafted responses and objections to Comerica's discovery requests [.4]; continued drafting the same [.9].	1.30	500.00	650.00
481879	04/29/2024	JR	Prepared for conference with Ms. Sparkman regarding her discovery responses and questions regarding the same [.7]; video conference with Ms. Sparkman regarding her discovery responses and responsive documents [.7]; drafted Ms. Sparkman's responses to Comerica's Interrogatories [.5]; analyzed Conduent's response to Plaintiff's third set of interrogatories and discovery strategy [.4]; discussed case strategy and case management with co-counsel [.1].	2.40	500.00	1,200.00
481869	04/30/2024	JR	Analyzed Defendant's discovery responses and production and discovery issues and deficiencies [.7]; strategy conference with co-counsel regarding the same [.2]; continued the same and began drafting meet and confer letter to opposing counsel regarding the same [1.9].	2.80	500.00	1,400.00
481868	05/01/2024	JR	Analyzed Defendant's discovery responses and production and drafted meet and confer letter to opposing counsel regarding discovery issues and deficiencies [3.4].	3.40	500.00	1,700.00
481862	05/02/2024	JR	Drafted responses and objections to Comerica's discovery requests to Ms. Sparkman [.7].	0.70	500.00	350.00

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481863	05/03/2024	JR	Exchanged email correspondence with Ms. Sparkman regarding discovery requests and documents [.1]; drafted responses and objections to Comerica's discovery requests to Ms. Sparkman [1.2]; followed up with the same [1.1].	2.40	500.00	1,200.00
483419	05/13/2024	JR	Case strategy and case management conference with co-counsel [.1]; analyzed Defendants' production of documents in preparation for deposition of Amy Davis and Jeffrey Ely [.3]; continued analyzing and reviewing the same [6.9]; analyzed deposition outline for the deposition of Amy Davis, conducted research regarding Amy Davis and sent strategy email correspondence to co-counsel regarding the same [.5]; conducted research regarding Jeffrey Ely, prepared deposition outline for deposition of Jeffrey Ely and sent email correspondence to co-counsel regarding the same [.7]; exchanged email correspondence with co-counsel regarding the same [.1].	8.60	500.00	4,300.00
483423	05/14/2024	JR	Analyzed Defendants' production of documents and prepared deposition outline for the deposition of Jeffrey Ely [4.4]; analyzed and reviewed document produced by Defendants and prepared questions for deposition of Amy Davis [.6]; continued drafting deposition outline for the deposition of Jeffrey Ely [1.1]; drafted Plaintiff's discovery responses [.2]; analyzed Ms. Sparkman's documents to produce and identified missing documents [.4]; continued the same and drafted email correspondence to Ms. Sparkman regarding missing documents [1.0]; conducted legal research regarding ██████████ [.9].	8.60	500.00	4,300.00
483441	05/16/2024	JR	Revised 30(b)(6) deposition notice [.2]; drafted Plaintiff's discovery responses to Comerica's requests [4.7]; analyzed subpoena to Child Support Services and revised the same [.6]; telephone conference with litigation assistant regarding revisions to the subpoena and public records request [.5]; continued drafting Plaintiff's responses to Comerica Bank [.4]; conducted research regarding address for service of subpoena and telephone conference with litigation assistant regarding the same [.4].	6.80	500.00	3,400.00
483445	05/17/2024	JR	Drafted Plaintiff's responses to Comerica Bank's discovery requests [1.0]; reviewed and analyzed Defendants' expert report [.8].	1.80	500.00	900.00
484038	05/20/2024	JR	Revised Ms. Sparkman's discovery responses and sent to co-counsel for review [2.3].	2.30	500.00	1,150.00
484058	05/23/2024	JR	Exchanged email correspondence with Ms. Sparkman regarding her discovery responses [.1]; analyzed and reviewed Ms. Sparkman's documents for production [.5]; analyzed Defendants' production of document and identified missing gaps in production of her transaction history [.5]; analyzed Ms. Sparkman's documents for transaction history patterns and drafted analysis of the same and case strategy email to co-counsel [1.1]; telephone conference with paralegal regarding preparing redactions of Ms. Sparkman's documents [.2]; analyzed email correspondence from co-counsel regarding Plaintiff's positions regarding ongoing discovery dispute [.2]; telephone conference with co-counsel regarding discovery case strategy and missing documents [.1].	2.70	500.00	1,350.00

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484060	05/23/2024	JR	Drafted and sent discovery dispute email correspondence to Defendants regarding [REDACTED] [1.0].	1.00	500.00	500.00
483481	05/24/2024	JR	Revised Ms. Sparkman's discovery responses and analyzed documents for production; exchanged email correspondence and worked on case management regarding finalizing the same [.4]; met and conferred with opposing counsel regarding final positions on outstanding discovery issues and disputes [.5]; telephone conference with paralegal regarding redactions and finalizing Plaintiff's production of documents [.5]; analyzed documents for production, finalized responses, exchanged email correspondence, and worked on case management regarding the same [1.4]; revised and finalized responses for service and reviewed final documents for production [1.2]; analyzed deposition transcript of Joe Froderman and case strategy [.6].	4.60	500.00	2,300.00
484137	05/28/2024	JR	Met and conferred with opposing counsel regarding outstanding discovery issues and dispute letter [.4]; drafted email summary of ongoing discovery disputes and agreements regarding the same to opposing counsel [.5]; exchanged email correspondence with co-counsel regarding the same [.1]; continued revising the same and sent to opposing counsel [.8].	1.80	500.00	900.00
484180	06/03/2024	JR	Analyzed Defendants production of documents and drafted email correspondence to co-counsel regarding analysis of the same [.6].	0.60	500.00	300.00
484228	06/04/2024	JR	Analyzed Defendants' production of documents and contracts and sent email correspondence to co-counsel regarding analysis of the same [1.1].	1.10	500.00	550.00
484570	06/06/2024	JR	Read and analyzed deposition transcript of Jonathon Opelt and Rita Bink [.7].	0.70	500.00	350.00
485373	06/10/2024	JR	Case management conference with co-counsel regarding deposition strategy, class certification strategy, mediation, discovery strategy and next steps [.4]; followed up with the same [.4]; analyzed production of "Warehouse" screenshots from Defendants, cross-referenced with policies and procedures already produced, drafted document regarding the same and sent to co-counsel [.7]; followed up with the same [.7].	2.20	500.00	1,100.00
485345	06/14/2024	JR	Analyzed Ms. Sparkman's deposition transcript for errors and sent email correspondence regarding the same to co-counsel [1.6].	1.60	500.00	800.00
485370	06/18/2024	JR	Analyzed email correspondence from Ms. Sparkman regarding errors in deposition testimony [.2]; discussed the same with co-counsel [.1]; strategy conference with co-counsel regarding case management, subpoena and deposition strategy, and next steps [.1]; drafted errata sheet for review and signature [.4].	0.80	500.00	400.00
485768	06/24/2024	JR	Analyzed upcoming deadlines and worked on case management regarding the same [.1]; analyzed subpoena to DCSS, status of subpoena and sent email correspondence to co-counsel regarding the same and scheduling call with legal counsel regarding the status of the subpoena [.6]; exchanged email correspondence regarding the same with co-counsel [.2].	0.90	500.00	450.00

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485874	06/27/2024	JR	Analyzed Defendants' production of documents, Defendants' contract with the Department of Child Support Services and outstanding discovery issues [2.5].	2.50	500.00	1,250.00
485880	06/28/2024	JR	Conducted legal research regarding subpoena requirements and costs and prepared for call with Seth Curtis regarding the subpoena to DCSS [.5]; telephone conference with co-counsel regarding the same [.1]; telephone conference with Seth Curtis regarding the status of the subpoena [.1]; followed up with the same [.3]; drafted email correspondence to co-counsel regarding the status of the subpoena, agreements with counsel for DCSS and next steps [.2]; schedule telephone conference with Seth Curtis [.1].	1.30	500.00	650.00
485927	07/01/2024	JR	Drafted and sent email correspondence to opposing counsel regarding scheduling depositions and mediation [.5]; drafted updated joint case management statement [.6]; exchanged email correspondence with staff regarding the same [.1]; analyzed and researched mediator proposed by opposing counsel [.4]; drafted email correspondence to co-counsel regarding the same, scheduling depositions and case strategy [.6]; continue drafting updated joint case management statement [1.2].	3.40	500.00	1,700.00
486898	07/03/2024	JR	Exchanged email correspondence with co-counsel regarding potential mediators availability and strategy regarding the same [.2]; conducted research regarding other potential mediators and sent analysis of potential mediators to co-counsel [.5]; analyzed and reviewed Defendants production of policy and procedure documents [1.7]; conducted research regarding potential mediator Eileen Brewer and drafted email correspondence to co-counsel regarding the same [1.6].	4.00	500.00	2,000.00
487868	07/10/2024	JR	Analyzed email correspondence from opposing counsel regarding mediation [.2]; sent email correspondence to opposing counsel regarding Updated Joint Case Management Statement [.1]; worked on case management regarding the same [.1]; analyzed response from opposing counsel regarding the same [.1]; finalized final copy of Joint Case Management statement for filing and exchanged email correspondence regarding the same [.5].	1.00	500.00	500.00
487878	07/11/2024	JR	Analyzed status of upcoming deadlines and discovery strategy and sent email correspondence to co-counsel regarding the same [.4]; exchanged email correspondence regarding Judge Linares availability for mediation [.2].	0.60	500.00	300.00
487883	07/12/2024	JR	Prepared for telephone conference with Seth Curtis regarding the status of the subpoena [.2]; telephone conference with Mr. Curtis regarding the same [.1]; exchanged email correspondence regarding re-scheduling of call [.2].	0.50	500.00	250.00
487885	07/12/2024	JR	Analyzed update from court regarding Joint Case Management conference [.1].	0.10	500.00	50.00
486903	07/17/2024	JR	Drafted stipulated motion to stay case deadlines [.6]; revised the same and sent to co-counsel [1.2]; revised draft stipulation and sent to opposing counsel [.3]; worked on class certification exhibits and conducted research regarding filing audio files with the Court [.3]; exchanged email correspondence with co-counsel and staff regarding the same [.1].	2.50	500.00	1,250.00
487209	07/23/2024	JR	Analyzed DCSS contracts with Defendants and prepared search terms for subpoena searches [.8].	0.80	500.00	400.00

Trans No	Date	Prof	Narrative	Units	Price	Value
487210	07/24/2024	JR	Analyzed DCSS contracts with Defendants and prepared search terms for subpoena searches [1.1].	1.10	500.00	550.00
487421	07/25/2024	JR	Analyzed DCSS contracts with Defendants and prepared search terms for subpoena searches and sent to co-counsel [.7]; attended pre-mediation conference with Judge Linares [.3]; analyzed Order from Court regarding case deadlines [.1]; revised search terms for subpoena to send to DCSS and drafted email correspondence to Seth Curtis regarding the same [.9].	2.00	500.00	1,000.00
487917	07/31/2024	JR	Prepared for telephone conference with DCSS regarding status of subpoena searches [.2]; telephone conference regarding the same [.1]; exchanged email correspondence regarding scheduling next conference with DCSS [.1].	0.40	500.00	200.00
489629	08/08/2024	JR	Prepared for call with Attorney General regarding subpoena [.1]; telephone conference regarding the same [.2].	0.30	500.00	150.00
488989	08/14/2024	JR	Analyzed Sparkman mediation submission requirements and email from co-counsel regarding the same [.3].	0.30	500.00	150.00
488996	08/16/2024	JR	Telephone conference with counsel for DCSS regarding status of subpoena production [.2]; strategy conference with co-counsel regarding drafting mediation brief [.2]; followed up with the same [.2]; drafted mediation brief [.3].	0.90	500.00	450.00
489341	08/19/2024	JR	Conducted legal research and drafted outline of Plaintiff's Mediation Statement to Share with co-counsel [2.0]; continued the same [5.2].	7.20	500.00	3,600.00
489346	08/21/2024	JR	Drafted Plaintiff's Shared Mediation Statement and ex parte mediation statement [2.5]; followed up with the same [4.8].	7.30	500.00	3,650.00
489351	08/23/2024	JR	Revised draft of Plaintiff's Mediation Statement and Ex Parte Mediation Statement and conducted legal research regarding the same [4.5]; continued the same and sent to co-counsel for review [.8].	5.30	500.00	2,650.00
489603	08/26/2024	JR	Telephone conference with co-counsel regarding draft of mediation statement and revisions to the same [.3]; revised draft of mediation statement [5.5]; continued the same [.8].	6.60	500.00	3,300.00
489686	08/27/2024	JR	Revised draft of mediation statement and sent draft to co-counsel for review [4.1]; drafted proposed settlement agreement [.6]; pulled together exhibits for draft mediation statement [.8]; continued drafting proposed settlement agreement [1.4].	6.90	500.00	3,450.00
490785	09/04/2024	JR	Reviewed co-counsel's edits and revised mediation statement in accordance with the same [3.0]; drafted proposed settlement agreement [2.6]; continued drafting the same [1.6].	7.20	500.00	3,600.00
490787	09/05/2024	JR	Revised and finalized draft of settlement agreement and sent to co-counsel [3.1]; strategy conference with co-counsel regarding the same and mediation strategy [.2].	3.30	500.00	1,650.00
490718	09/06/2024	JR	Analyzed [REDACTED] ahead of mediation [1.0]; discussed the same with co-counsel and strategy [.2]; sent email correspondence to mediator's assistance regarding rescheduling mediation [.2]; revised mediation statement and incorporated co-counsel's revisions to the same [.3].	1.70	500.00	850.00

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490790	09/09/2024	JR	Finalized exhibits and mediation statement to submit [1.2].	1.20	500.00	600.00
491456	09/10/2024	JR	Exchanged email correspondence with co-counsel regarding scheduling mediation and the new date for mediation [.2].	0.20	500.00	100.00
491570	09/12/2024	JR	Drafted stipulation to amend case schedule and sent to co-counsel for review [1.4]; revised stipulation to amend case schedule [.5]; drafted email correspondence and sent to opposing counsel [.2].	2.10	500.00	1,050.00
491694	09/18/2024	JR	Analyzed Defendants' revisions to stipulated motion to amend case schedule [.1]; exchanged email correspondence with co-counsel and opposing counsel regarding the same [.2]; reviewed and finalized the same for filing [.4].	0.70	500.00	350.00
491702	09/25/2024	JR	Analyzed [REDACTED] and drafted memorandum regarding the same [1.8].	1.80	500.00	900.00
491743	09/26/2024	JR	Drafted email correspondence to mediator and administrator regarding adding an additional matter and request for an additional page [.6]; telephone conference with co-counsel regarding the same [.1]; sent email correspondence to mediator, Judge Linares, administrator [.1]; drafted email correspondence to California Attorney General's office regarding status of subpoena and production [.2]; exchanged email correspondence regarding the same [.1]; analyzed Defendants' contracts and drafted memo regarding compensation [1.8].	2.90	500.00	1,450.00
491747	09/27/2024	JR	Exchanged email correspondence regarding the status of California Child Support Services subpoena production [.2].	0.20	500.00	100.00
492071	09/30/2024	JR	Prepared mediation memorandum regarding Defendants' compensation and contracts [1.5].	1.50	500.00	750.00
492322	10/01/2024	JR	Analyzed Case Scheduling Order from the Court [.1]; worked on case management regarding the same and discussed the same with co-counsel [.9]; drafted email correspondence to opposing counsel regarding briefing schedule and agreement to the same [.6]; revised and sent the same [.1]; exchanged email correspondence with California Attorney General's office regarding status of subpoena production [.1].	1.80	500.00	900.00
493886	10/14/2024	JR	Followed up with counsel for the Department of Child Support Services regarding first batch of subpoena documents [.1]; exchanged email correspondence regarding the same [.2]; analyzed documents from the Department of Child Support Services produced in response to the subpoena for documents [2.0]; analyzed [REDACTED] and prepared memo regarding the same [1.6]; followed up with the same [1.9].	5.80	500.00	2,900.00
493888	10/15/2024	JR	Analyzed case deadlines and worked on case management regarding the same [.2]; analyzed documents from the Department of Child Support Services produced in response to the subpoena for documents [1.8]; followed up with the same [1.8].	3.80	500.00	1,900.00
493891	10/15/2024	JR	Analyzed Defendants' contracts and prepared memo regarding the same [1.5].	1.50	500.00	750.00
493926	10/22/2024	JR	Revised Plaintiff's Ex Parte Mediation statement and sent to co-counsel for review [.5].	0.50	500.00	250.00

Trans No	Date	Prof	Narrative	Units	Price	Value
493937	10/28/2024	JR	Revised and prepared Plaintiff's ex- parte mediation statement [2.6]; revised and finalized Plaintiff's shared mediation statement to submit to mediator [.2]; analyzed Defendants' shared mediation statement [.4].	3.20	500.00	1,600.00
495758	11/05/2024	JR	Revised draft of settlement agreement [.2].	0.20	500.00	100.00
495773	11/12/2024	JR	Analyzed upcoming deadlines for class certification briefing and discovery strategy [.2]; discussed the same and class briefing deadlines with co-counsel [.2]; drafted joint status report to the Court regarding mediation [.7]; exchanged email correspondence regarding finalizing and revising deposition notices for service [.4].	1.50	500.00	750.00
495776	11/13/2024	JR	Revised draft of joint status report to the Court regarding mediation and sent to co-counsel for review [.6].	0.60	500.00	300.00
496371	11/15/2024	JR	Sent email correspondence to opposing counsel regarding joint status report regarding mediation due to the Court [.1]; reviewed and finalized status report to file [.2]; exchanged email correspondence with co-counsel regarding the same [.1]; analyzed and reviewed draft of class certification motion [.8].	1.20	500.00	600.00
495710	11/21/2024	JR	Drafted administrative motion to seal Defendants' documents and conducted legal research regarding the same [1.0]; continued working on the same [1.9]; worked on various issues regarding sealed documents and analyzed sealed documents and rules regarding the same [1.1].	4.00	500.00	2,000.00
495707	11/22/2024	JR	Finalized and drafted motion to seal, declaration of Blythe H. Chandler in support of motion to seal and proposed order on motion to seal [1.4].	1.40	500.00	700.00
496380	11/26/2024	JR	Analyzed status of ongoing discovery disputes, missing documents and drafted email correspondence to opposing counsel regarding the same ahead of discovery cutoff [1.1]; continued working on and sent the same [1.0].	2.10	500.00	1,050.00
496383	11/27/2024	JR	Analyzed Defendant's declaration in support of the motion to seal [.7].	0.70	500.00	350.00
498304	12/04/2024	JR	Drafted 30(b)(6) deposition outline [1.8]; continued drafting 30(b)(6) outline [.4]; continued drafting 30(b)(6) outline and sent to co-counsel draft and email regarding status of the same [3.8].	6.00	500.00	3,000.00
498664	12/19/2024	JR	Analyzed Judge Ryu's standing order and calculated new deadlines and hearing dates for joint stipulation amending the case schedule [.5]; revised the joint stipulation to amend the case schedule to fix motion for summary judgment hearing and incorrect dates [.4]; telephone conference with co-counsel regarding revisions to the same [.1]; revised the joint stipulation to amend the case schedule and sent to co-counsel [.4]; followed up with telephone conference with co-counsel regarding the same [.1]; sent email correspondence with co-counsel regarding revised draft of the same [.1]; finalized draft and sent email correspondence to opposing counsel regarding revised draft of the same [.4].	2.00	500.00	1,000.00
498653	12/20/2024	JR	Case strategy conference with co-counsel regarding settlement and next steps [.8]; finalized agreed joint stipulation amending the case schedule for filing [.1].	0.90	500.00	450.00

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500276	01/16/2025	JR	Analyzed and revised proposed settlement agreement and sent email correspondence to co-counsel regarding the same [.8]; worked on case management regarding settlement notices to class members and set up the same [.3].	1.10	500.00	550.00
500240	01/29/2025	JR	Drafted and revised postcard notice, website notice, and letter to certain class members [1.2]; continued working on the same [2.9]; continued working on the same and revised settlement agreement in accordance with the same; sent draft notices to co-counsel [4.5].	8.60	500.00	4,300.00
501433	02/19/2025	JR	Analyzed email correspondence from opposing counsel regarding settlement agreement [.1]; sent correspondence regarding the same to co-counsel [.1].	0.20	500.00	100.00
504395	03/04/2025	JR	Revised proposed stipulation regarding amending dates and case schedule and sent the same to co-counsel flagging changes and issues [.6]; sent revised stipulation to opposing counsel to file [.2].	0.80	500.00	400.00
502866	03/07/2025	JR	Analyzed Defendants' proposed revisions to settlement agreement and settlement notices to the class [.2]; reviewed the Court's Order on the amended case schedule [.1].	0.30	500.00	150.00
Statement Professional: Jasmin Rezaie				353.50		176,750.00
Statement Professional: Jodi Nuss						
493200	10/21/2024	JN	Worked on strategy for further analysis and evidence to submit in support of motion [.2]; Worked on declaration in support of motion for class certification.[0.8]	1.00	330.00	330.00
493341	10/23/2024	JN	Worked on declaration in support of motion for class certification.[2.4]	2.40	330.00	792.00
497428	12/16/2024	JN	Worked on data excerpt exhibits and crosswalk of same.[2.4]	2.40	330.00	792.00
497744	12/20/2024	JN	Worked on data analysis.[.4]	0.40	330.00	132.00
497855	12/23/2024	JN	Worked on processing of production documents and loading into lpro.[.4];	0.40	330.00	132.00
497877	12/23/2024	JN	Worked on processing of production documents	0.50	330.00	165.00
498274	01/03/2025	JN	Reviewed correspondence from Mr. Jaffe regarding status of analysis.[.1]	0.10	330.00	33.00
498283	01/03/2025	JN	Video conference with Mr. Jaffe regarding expert report.[.5]	0.50	330.00	165.00
498395	01/05/2025	JN	Reviewed email from Mr. Jaffe regarding index of data files and prepared response to same.[.2]	0.20	330.00	66.00
498503	01/06/2025	JN	Reviewed and revised draft assignment letter to Mr. Jaffe.[.9]	0.90	330.00	297.00
498528	01/07/2025	JN	Reviewed email from Mr. Jaffe regarding assignment letter and prepared email regarding proposed revisions to same.[.1]	0.10	330.00	33.00
499032	01/10/2025	JN	Worked on strategy for further analysis.; reviewed data provided by Mr. Jaffe to identify potential discrepancies.	0.50	330.00	165.00
499128	01/13/2025	JN	Worked on strategy for continuing expert analysis.[.1]	0.10	330.00	33.00
499137	01/13/2025	JN	Worked on analysis of Mr. Jaffe's latest output files[3.3]; Conferred regarding strategy for presentation and additional data points for summary of analysis.[.2]	3.50	330.00	1,155.00
499286	01/15/2025	JN	Revised and double checked outputs f combined analysis based on latest file from Mr. Jaffe	1.80	330.00	594.00

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499547	01/21/2025	JN	Worked on strategy for cross referencing data points returned by Mr. Jaffe for completion of expert report.[.1]	0.10	330.00	33.00
499620	01/22/2025	JN	Worked on strategy concerning potential modification to expert analysis.[.2]	0.20	330.00	66.00
500047	01/28/2025	JN	Prepared and QC'd settlement class list	0.60	330.00	198.00
500086	01/29/2025	JN	Prepared email to Mr. Grugan enclosing link to class list.[.1]	0.10	330.00	33.00
504238	03/28/2025	JN	Processed and analyzed data produced for class notice to identify breadth of potential lookups to be performed[.9]	0.90	330.00	297.00
504482	04/01/2025	JN	Worked on production in response to subpoena to Mr. Jaffe.	0.20	330.00	66.00
504637	04/02/2025	JN	Reviewed email regarding deposition of Mr. Fry and prepared email enclosing same.[.1]	0.10	330.00	33.00
505310	04/11/2025	JN	Revised exhibits to motion to compel.[.2]	0.20	330.00	66.00
505779	04/17/2025	JN	Joined class contact data provided by defendant to operative class list and prepared email regarding concerns with same.[.4]	0.40	330.00	132.00
505956	04/23/2025	JN	Worked on data analysis regarding class lists[1.9]	1.90	330.00	627.00
506817	04/29/2025	JN	Worked on production load errors and upload to disco.[.4]	0.40	330.00	132.00
506662	05/05/2025	JN	Reviewed email regarding class list and status of settlement and responses to same.[.1]; worked on strategy for analysis and reporting of findings of same.[.2]	0.30	330.00	99.00
506696	05/05/2025	JN	Reviewed data regarding status of four SR numbers.	0.30	330.00	99.00
506955	05/06/2025	JN	Prepared filtered file for Ms. Perkins	1.60	330.00	528.00
507034	05/07/2025	JN	Reviewed settlement agreement and recent correspondence regarding same.[.2]; Prepared revised copies of Exhibit C to settlement agreement and emails coordinating service of same.[.6]	0.80	330.00	264.00
507275	05/12/2025	JN	Reviewed email from Ms. Indra regarding class list and emails regarding preparation of same.[.2]; Prepared email to Ms. Indra enclosing link to notice list.[.1]	0.30	330.00	99.00
507472	05/14/2025	JN	Reviewed emails from Ms. Perkins regarding settlement agreement and prepared emails regarding same.[.1]; Assembled final executed copy of settlement agreement.[.1]	0.20	330.00	66.00
509270	06/04/2025	JN	Worked on analysis of data and Mr. Jaffe's output files regarding issues raised in motion to exclude.[2.6]	2.60	330.00	858.00
510699	06/26/2025	JN	Prepared notes for final approval hearing.[1.1]	1.10	330.00	363.00
512966	07/30/2025	JN	Reviewed order on motion for preliminary approval.[.1]	0.10	330.00	33.00
513191	08/01/2025	JN	Reviewed order regarding declaration of settlement administrator.[.1]	0.10	330.00	33.00
513809	08/08/2025	JN	Reviewed email from Mr. Balhoff regarding late opt-outs[.1]	0.10	330.00	33.00
514640	08/18/2025	JN	Reviewed correspondence regarding class list and prepared emails regarding same.[.1]	0.10	330.00	33.00
514658	08/18/2025	JN	Reviewed prior iterations of class lists and prepared new version of same.[.4]; prepared email to Ms. Inera regarding revised class list.[.1]	0.50	330.00	165.00
514855	08/20/2025	JN	Worked on data analysis[1.9]; personal conference regarding same.[.1]; prepared email to Mr. Balhoff regarding linking of opt-out requests.[.1]	2.10	330.00	693.00

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514945	08/21/2025	JN	Reviewed email from Ms. Indra regarding class notices[.1]	0.10	330.00	33.00
515241	08/27/2025	JN	Reviewed correspondence with Ms. Indra regarding translations on website.[.1];	0.10	330.00	33.00
515282	08/27/2025	JN	Analyzed final class notice list and reported on same[.4]	0.40	330.00	132.00
515359	08/28/2025	JN	Reviewed email from Ms. Indra regarding changes to settlement notice.[.1]	0.10	330.00	33.00
515436	09/02/2025	JN	Reviewed email from Ms. Indra regarding notice approval.[.1]	0.10	330.00	33.00
Statement Professional: Jodi Nuss				30.90		10,197.00
Statement Professional: Ryan Tack-Hooper						
496558	11/13/2024	RT	Call re: deposition planning [.3]	0.30	750.00	225.00
496577	11/20/2024	RT	Prep for expert deposition [5.1]	5.10	750.00	3,825.00
496578	11/21/2024	RT	Prep for expert deposition [4.9]	4.90	750.00	3,675.00
496582	11/23/2024	RT	Prep for expert deposition [3.6]	3.60	750.00	2,700.00
496584	11/25/2024	RT	Call w/ co-counsel re: deposition [.5]	0.50	750.00	375.00
498802	12/02/2024	RT	Prepared for expert deposition [4.5]	4.50	750.00	3,375.00
498806	12/03/2024	RT	Prepared for expert deposition [3.4]	3.40	750.00	2,550.00
498812	12/05/2024	RT	Prepared for and conducted expert deposition [4.5]	4.50	750.00	3,375.00
Statement Professional: Ryan Tack-Hooper				26.80		20,100.00
Grand Total:				1,046.20		\$721,096.00