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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO
UNLIMITED CIVIL**

DAVID WALKER, MELISSA CLARK,
and BENJAMIN WILSON, individually
and as representatives of the Class,

Plaintiffs,

v.

INFLECTION RISK SOLUTIONS, LLC,

Defendant.

Case No.: 22-CIV-02954

**PLAINTIFFS' NOTICE OF
MOTION & MOTION FOR
ATTORNEYS' FEES, COSTS,
AND CLASS REPRESENTATIVE
SERVICE PAYMENTS**

Assigned for All Purposes to Hon.
Don R. Franchi

Date: August 18, 2025
Time: 3:00 p.m.
Department: 15

1 PLEASE TAKE NOTICE that Plaintiffs David Walker, Melissa Clark, and
2 Benjamin Wilson (“Plaintiffs”) respectfully request that the Court grant Class Counsel’s
3 requested awards of 25% of the Settlement Fund as attorneys’ fees (\$441,250.00),
4 \$11,769.94 in costs, service payments to the Named Plaintiffs of \$5,000 each, for a total of
5 \$15,000, and \$97,991 in settlement administration expenses. Defendant does not oppose the
6 relief sought in this motion.

7 Plaintiffs’ Motion is based on this Notice of Motion and Motion, the Memorandum
8 of Points & Authorities in Support thereof, the Declaration of E. Michelle Drake, the
9 pleadings, files, and records on file herein.

10
11 BERGER MONTAGUE PC

12 Date: May 7, 2025

/s/E. Michelle Drake
E. Michelle Drake (*pro hac vice*)

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF SAN MATEO**

14 DAVID WALKER, MELISSA
15 CLARK, and BENJAMIN WILSON,
16 individually and as representatives of the
Classes,

17 Plaintiffs,

18 v.

19 INFLECTION RISK SOLUTIONS,
20 LLC,

21 Defendant.

Case No.: 22-CIV-02954

ASSIGNED FOR ALL PURPOSES TO
JUDGE DON R. FRANCHI, DEPT. 15

**PLAINTIFFS' MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE
PAYMENTS**

Date: August 18, 2025

Time: 3:00 PM

Location: Department 15

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1 **I. INTRODUCTION**

2 Pursuant to Cal. Rules of Court, rule 3.769(b), and in accordance with the Court’s
3 Preliminary Approval Order, Plaintiffs and Class Counsel seek approval of an award of
4 25% of the Settlement Fund in attorneys’ fees (\$441,250), \$11,769.94 to reimburse Class
5 Counsel for out-of-pocket, documented expenses, \$5,000 as a service payment to each
6 Plaintiff (for a total of \$15,000) and \$97,991 to American Legal Claim Services for
7 settlement administration expenses. Class Counsel and Plaintiffs have achieved a
8 settlement in this case that provides significant relief to the Class. Class Counsel and
9 Plaintiffs accomplished this feat despite the numerous risks faced at every stage of the
10 litigation. The requested fees, expenses, and service payments are authorized by the
11 Settlement Agreement (Declaration of E. Michelle Drake in Support of Unopposed Motion
12 for Preliminary Approval of Class Action Settlement (“Drake Decl. ISO Prelim. App.”),
13 Ex. A (“Settlement Agreement”)) and are reasonable in light of applicable precedent,
14 Counsel’s investment of time and resources, and the overall result achieved. Defendant
15 does not oppose this Motion, nor has any Settlement Class Member objected to the proposed
16 awards or any other aspect of the settlement.¹

17 **II. BACKGROUND**

18 The litigation history, settlement negotiations, and terms of the settlement are set
19 forth in the Memorandum in Support of Plaintiffs’ Unopposed Motion for Preliminary
20 Settlement Approval, and are incorporated here. Rather than recount all those facts here,
21 this memorandum instead focuses on the facts most significant to this Motion, namely the
22 efforts of Class Counsel and the Class Representatives to achieve the significant result in
23 this case.

24
25 ¹ Plaintiffs are filing this Motion in advance of the May 21, 2025 deadline for objections so that
26 Settlement Class Members will have an opportunity to review the Motion, if they wish to do so,
27 before deciding whether to file an objection. *See In re Mercury Interactive Corp. Sec. Litig.*, 618
28 F.3d 988, 993 (9th Cir. 2010) (stating that such motions should be filed before the deadline to object
has passed). If any objections are filed, Class Counsel will address them in connection with the
forthcoming motion for final settlement approval.

1 **III. CLASS COUNSEL’S EXPERIENCE AND EFFORTS TO SECURE**
2 **BENEFITS FOR THE CLASS**

3 Class Counsel are experienced Fair Credit Reporting Act (“FCRA”) and class action
4 litigators. The qualifications of Berger Montague PC (“Berger Montague”) are set forth in
5 the attached Declaration of E. Michelle Drake (“Drake Decl.”) submitted with this Motion.
6 Class Counsel has successfully litigated over 40 FCRA class actions and speak nationally
7 on the FCRA and class action litigation. As a result of their experience in this area, Class
8 Counsel were able to efficiently and effectively litigate this action and had the credibility
9 necessary to negotiate a good settlement on behalf of the Class. Class Counsel litigated this
10 case entirely on a contingency basis and have thus far received no compensation for their
11 time or out-of-pocket costs. (Drake Decl. ¶ 8.) In the event that Class Counsel did not
12 successfully resolve this matter, Class Counsel would have been paid nothing.

13 Plaintiffs and Class Counsel have invested a substantial amount of time and
14 resources investigating and litigating this action. After being contacted by Plaintiffs, Class
15 Counsel fully investigated Plaintiffs’ claims, drafted and filed the Complaint. (*Id.* ¶ 3.)
16 Early in the litigation, the Parties then commenced informal exchanges of information, and
17 Defendant provided data samples which Plaintiffs reviewed and analyzed. (*Id.* ¶ 4.) This
18 analysis was a complex multi-step process, wherein the Plaintiffs received an initial data set
19 from Defendant. Plaintiffs then engaged in extensive meet and confers with Defendant
20 regarding the meaning of the data and the availability of additional data. Based on these
21 meet-and-confers, Defendant produced a supplemental data set. Plaintiffs then analyzed
22 the initial data and the supplemental data, comparing those data sets to public record data,
23 and consulting with experts regarding the data sets and how they could be used and
24 reviewed on a class-wide basis. (*Id.*) Armed with this information, the Parties participated
25 in a full day mediation with third party neutral Lou Peterson, Esq. on August 17, 2023.
26 While the case did not settle at mediation, the Parties continued to have fruitful arms’ length
27 negotiations through counsel over the next months, and on March 7, 2024, a binding Terms
28 Sheet was fully executed.

1 On March 29, 2024, by the Parties' agreement, Plaintiffs filed the Second Amended
2 Complaint, re-asserting the prior allegations, narrowing and clarifying the class allegations
3 to one class in alignment with the settlement terms, removing prior named plaintiffs who
4 settled with Defendant individually, and adding Plaintiff Wilson. (*See generally* Second
5 Am. Compl.) Class Counsel drafted the Settlement Agreement and the preliminary
6 approval papers, and attended the preliminary approval hearing. (Drake Decl. ¶ 5.) Since
7 preliminary approval, Class Counsel have been deeply involved in the administration of the
8 settlement, including the review of submitted claims' validity. (*Id.* ¶ 6.) Class Counsel will
9 prepare and argue the final approval motion. (*Id.* ¶ 7.)

10 Class Counsel's fee entries demonstrate the amount of time devoted to each of these
11 tasks and how Class Counsel's lodestar was calculated. To date, Class Counsel have
12 devoted over 656 hours to this matter. (*Id.* ¶ 9.) The value of this time at Class Counsel's
13 normal hourly rates is \$434,948.50. (*Id.*) Moreover, Class Counsel anticipates contributing
14 additional time and effort to this case. Additional tasks Class Counsel expects to perform
15 include continuing to oversee the administration of the Settlement, including claims review,
16 researching and drafting final approval papers, preparing for the final fairness hearing,
17 arguing at the final fairness hearing, and overseeing the distribution of the Settlement funds.
18 (*Id.* ¶ 7.)

19 Importantly, Class Counsel's lodestar also does not reflect the full extent of Class
20 Counsel's efforts outside of this case that ultimately benefited the Class. In addition to work
21 performed specifically in this matter, Class Counsel's firm monitors every new FCRA case
22 that is filed, on a daily basis, tracks every FCRA class action case, and reviews every FCRA
23 opinion issued anywhere in the country. (*Id.* ¶ 11.) This ongoing monitoring and research
24 also allowed Class Counsel to effectively assess the reasonability of the recovery in this
25 matter and motivated Class Counsel to negotiate a settlement.

26 These efforts provided tremendous benefits to the Class. Class Counsel's FCRA
27 experience and expertise allowed Class Counsel to reach a favorable settlement despite
28

1 significant obstacles to recovery.

2 To date, Class Counsel has incurred \$11,769.94 in out-of-pocket litigation costs.
3 (*Id.* ¶ 12.) All of these costs were necessarily incurred and are of the type typically
4 reimbursed by paying clients. The estimated costs of settlement administration in this
5 matter (which are not included in the litigation cost total) are anticipated not to exceed
6 \$97,991 and are also reasonably incurred. (*Id.* ¶ 14.)

7 **IV. PLAINTIFFS' COMMITMENT AND EFFORTS WERE VITAL TO**
8 **SECURING CLASSWIDE RELIEF**

9 Plaintiffs played a vital role in the success of this lawsuit and at all times had the
10 best interest of the Class in mind. Plaintiffs (1) identified and contacted Counsel about their
11 potential claims, (2) reviewed and approved the complaint and/or amended complaints, (3)
12 provided personal documents and communications to Counsel for review, including
13 communications from Defendant and end-users, (4) regularly conferred with Counsel,
14 including participating in a lengthy initial interview with intake staff and follow up calls
15 with Counsel, reviewing updates from Counsel, and exchanging consistent emails with
16 Counsel, (5) made themselves available to and conferred with Counsel throughout
17 settlement negotiations, and (6) reviewed and approved the Settlement Agreement, and the
18 Amended Settlement Agreement. (Suppl. Mem. ISO Prelim. App., Ex. 6, Wilson Decl. ¶
19 7; Ex. 5, Clark Decl. ¶ 8; Ex. 4, Walker Decl. ¶ 7.) Plaintiffs Wilson and Clark both estimate
20 they spent 45 hours on this litigation. (Wilson Decl. ¶ 8; Clark Decl. ¶ 9.) Plaintiff Walker
21 estimates that he spent between 48-60 hours on this matter. (Walker Decl. ¶ 9.) All
22 Plaintiffs were ready and willing to provide further assistance if this matter did not settle.
23 Plaintiffs' efforts were essential to the success of this litigation.

24 **V. THE SETTLEMENT PROVIDES SUBSTANTIAL RELIEF**

25 The claims in this case relate to Defendant's allegedly inaccurate reporting of
26 criminal histories due to its failure to employ reasonable procedures to ensure maximum
27 possible accuracy in its reporting. Specifically, Plaintiffs allege that Defendant used loose
28 matching criteria that failed to exclude matches to sex offender registries and criminal

1 record databases even when the consumer's and the offender's date of birth and address
2 information were different. (See Second Am. Compl. ¶¶ 1-9.)

3 The Settlement Class consists of three groups of consumers, the Name & DOB
4 Match Group, the SOR Reports Group and the Successful Disputes Group. (Settlement
5 Agreement ¶ 23.) Generally speaking, the Name & DOB Match Group consists of
6 individuals who were associated with criminal records despite certain attributes not
7 matching those records, the SOR Report Group includes all individuals matched to a sex
8 offender registry record during the class period, and the Successful Disputes Group consists
9 of individuals who disputed the accuracy of criminal records reported by Defendant. (See
10 Mem. ISO Prelim. App. at 4.) The class list provided by Defendant to the Administrator
11 indicates that the Name & DOB Match Group contains 2,901 individuals, the SOR Report
12 Group contains 32,380 individuals, and the Successful Disputes Group contains 326
13 individuals. (Drake Decl. ¶ 15.)

14 In consideration for the release of the Settlement Class Members' claims, Defendant
15 will pay \$1,765,000 to the Settlement Class as part of a common settlement fund.
16 (Settlement Agreement ¶ 22.) In no circumstance will any portion of this fund revert to the
17 Defendant. (*Id.* ¶ 32.) After any Court-approved deductions for attorneys' fees, costs,
18 settlement administration costs, and Class Representative service awards, the entire
19 remaining fund will be distributed such that Successful Dispute Group Members will each
20 be entitled to an automatic payment of \$1,500, and the balance will then be distributed *pro*
21 *rata* to those SOR Report and Name & DOB Match Group Members who returned timely,
22 valid claim forms, with payments capped at \$1,500 per Member. (*Id.* ¶ 28.)

23 On February 5, 2025, the Settlement Administrator sent Notice to the 35,607
24 Settlement Class Members in accordance with the procedures outlined in the Settlement
25 Agreement. On the same date, the Administrator also activated the Settlement Website. On
26 April 30, 2025, the Administrator sent a reminder notice to Settlement Class Members who
27 had not yet submitted a claim. (Drake Decl. ¶ 15.)

1 As of April 23, 2025, there have been approximately 428 valid claims submitted,
2 three opt-outs and zero objections received. While claims are still being accepted and
3 reviewed, the current figures result in a valid claims rate of approximately 5% for the Name
4 & DOB Match Group and 1% for the SOR Report Group.² If claims were no longer being
5 accepted, and the requested amounts in fees, costs, and service awards are approved, each
6 participating Class Member will receive a check for approximately \$1,500. However, the
7 postmark deadline for claims, objections, and opt-outs is May 21, 2025, and reminder notice
8 was only recently sent. Accordingly, there may be more claims filed after the date of this
9 filing. Plaintiffs will provide updated numbers in conjunction with the final approval
10 motion.

11 **VI. ARGUMENT**

12 **A. THE COURT SHOULD APPROVE THE REQUESTED ATTORNEYS' FEES AND**
13 **COSTS.**

14 The requested award of 25% of the Settlement Fund fairly and reasonably
15 compensates Class Counsel. It is also consistent with fees awarded by California courts in
16 similar cases. Class Counsel invested significant resources in this case with the possibility
17 of no recovery whatsoever. Due in no small part to their skill, experience, and past success
18 litigating similar claims, Class Counsel were able resolve this case in a settlement that
19 provides significant relief to class members, after extensive arms' length negotiations. The
20 parties' ability to reach the settlement without dispositive motion practice demonstrates
21 Class Counsel's efficient use of resources and recognizes the risks and expenses of litigation
22 and trial, as well as the benefits of settlement. A lodestar cross-check confirms the
23 appropriateness of awarding 25% of the Fund, as the award results in a reasonable multiplier
24 of 1.01, which is well within the range generally approved in California.

25 _____
26 ² The lower claims rate for the SOR Report Group is expected. As was noted in the preliminary
27 approval papers, it was expected that not every member of that Group would be eligible to submit a
28 claim. (See Mem. ISO Prelim. App. at 11-12; Supp. Mem. ISO Prelim. App. at 6-7.) Because the
claims rate is calculated with a denominator which includes both eligible and ineligible claimants,
the resulting percentage is lower.

1 **1. The Percentage of the Settlement Fund Requested (25%) is Reasonable.**

2 The Court has an “independent right and responsibility” to review the requested
3 attorneys’ fees and award fees that are determined to be reasonable. *See Garabedian v. Los*
4 *Angeles Cellular Tel. Co.*, 12 Cal. Rptr. 3d 737, 741 (Cal. App. 4th Dist. 2004). “Courts
5 recognize two methods for calculating attorney fees in civil class actions: the
6 lodestar/multiplier method and the percentage of recovery method.” *Wershba v. Apple*
7 *Computer, Inc.*, 110 Cal. Rptr. 2d 145, 169 (Cal. App. 6th Dist. 2001). Under the percentage
8 method, the court may award class counsel a percentage of the common fund recovered for
9 the class. *Id.* “The percentage-of-recovery method is generally favored in common fund
10 cases because it allows courts to award fees from the fund in a manner that rewards counsel
11 for success and penalizes it for failure.” *Laffitte v. Robert Half Int’l. Inc.*, 205 Cal. Rptr.
12 3d 555, 564 (Cal. 2016) (quoting *In re Rite Aid Corp. Securities Litigation* 396 F.3d 294,
13 300 (3d Cir. 2005)). The percentage method is particularly appropriate in common fund
14 cases, because “the benefit to the class is easily quantified.” *In re Bluetooth Headset Prods.*
15 *Liab. Litig.*, 654 F.3d 935, 942 (9th Cir. 2011); *see also Laffitte*, 205 Cal. Rptr. 3d at 560
16 (affirming attorney fee award equal to 33% of settlement).

17 In determining the proper percentage of the fund, courts examine the risks and
18 potential value of the litigation, the contingent nature of the representation, the novelty and
19 difficulty of the issues presented, the skill shown by counsel, and the hours worked and
20 asserted hourly rates. *Laffitte*, 205 Cal. Rptr. 3d at 573-4. California courts have not
21 established a “benchmark” percentage of the fund but have noted that “[e]mpirical studies
22 show that, regardless whether the percentage method or the lodestar method is used, fee
23 awards in class actions average around one-third of the recovery.” *Chavez v. Netflix, Inc.*,
24 75 Cal. Rptr. 3d 413, 433 n.11 (Cal. App. 1st Dist. 2008) (internal quotation omitted). Here,
25 the requested 25% of the settlement fund is an appropriate award of attorneys’ fees and is
26 in line with similar awards in FCRA settlements from across the country. *See, e.g., Moore*
27 *v. Aerotek, Inc.*, No. 2:15-CV-2701, 2017 WL 2838148, at *8 (S.D. Ohio June 30, 2017),
28

1 *r&r adopted*, 2017 WL 3142403 (S.D. Ohio July 25, 2017); *Johnson v. Midwest Logistics*
2 *Sys. Ltd.*, No. 2:11-cv-1061, 2013 WL 2295880, at *6 (S.D. Ohio May 24, 2013); *Flores v.*
3 *Express Servs., Inc.*, No. 2:14-cv-03298, 2017 WL 1177098 (E.D. Pa. Mar. 30, 2017); *Smith*
4 *v. Res-Care, Inc.*, No. CV 3:13-5211, 2015 WL 6479658, at *8 (S.D.W. Va. Oct. 27, 2015);
5 *Serrano v. Sterling Testing Sys., Inc.*, 711 F. Supp. 2d 402, 421 (E.D. Pa. 2010).

6 a. The Results Obtained are Significant.

7 Plaintiffs and Class Counsel achieved a noteworthy result in this matter, especially
8 in light of the relatively small individual amounts at issue (the FCRA provides for statutory
9 damages of \$100 - \$1,000). The monetary relief achieved for the Settlement Class will
10 result in payments currently estimated at over \$1,000 per participating Settlement Class
11 Member. The monetary relief here is in line with or better than similar settlements. (*See*
12 *Memo. ISO Prelim. App.* at 10-11 (listing cases).)

13 In light of the risks, discussed further below, that would have faced the Class had
14 litigation continued, this is an excellent recovery which supports Class Counsel's requested
15 fees.

16 b. Class Counsel Undertook Considerable Risk in Litigating
17 this Case on a Contingency Basis as Recovery Was Far From
18 Guaranteed.

19 Class Counsel took this case on a contingency fee basis, and Class Counsel invested
20 time and resources in this matter without any compensation to date. (Drake Decl. ¶ 8.)
21 Class action litigation is inherently complicated and time-consuming. On top of the
22 demands that come with this type of litigation, Class Counsel also made this investment
23 despite the very real possibility of an unsuccessful outcome and no fee recovery of any kind.
24 The California Supreme Court has recognized the importance of rewarding attorneys who
25 take cases on a contingency basis. *See Graham v. DaimlerChrysler Corp.*, 21 Cal. Rptr. 3d
26 331, 352 (Cal. 2004) ("A contingent fee must be higher than a fee for the same legal services
27 paid as they are performed. The contingent fee compensates the lawyer not only for the
28 legal services he renders but for the loan of those services.") (citation and internal quotation
marks omitted); *see also In re Wash. Public Power Supply System Sec. Litig.*, 19 F.3d 1291,

1 1299 (9th Cir. 1994) (“Contingent fees that may far exceed the market value of the services
2 if rendered on a non-contingent basis are accepted in the legal profession as a legitimate
3 way of assuring competent representation for plaintiffs who could not afford to pay on an
4 hourly basis regardless whether they win or lose.”).

5 At all times, this case carried a very real possibility of an unsuccessful outcome and
6 Class Counsel receiving no fees of any kind. At the time the complaint was filed, there
7 were no obvious indications that a settlement would be reached or that the litigation would
8 be successful. Further, continued litigation of this matter carried a number of very specific
9 risks that could have resulted in no recovery for the Class and no compensation for Class
10 Counsel.

11 Specifically, Plaintiffs would have confronted risks on class certification. In a class
12 that consists of individuals mismatched to criminal records, the challenge on class
13 certification is to identify mismatches – to do better at Defendant’s job than Defendant
14 itself. In a settlement posture, that concern is addressed by the claims process: allowing
15 mismatched individuals to identify themselves. But on an adversarial motion for class
16 certification, that task is harder, and the risks are real.

17 Further, the FCRA is not a strict liability statute. *Dalton v. Capital Associated*
18 *Indus.*, 257 F.3d 409, 417 (4th Cir. 2001). A FCRA plaintiff can recover statutory damages
19 only where the defendant has acted negligently or willfully, and where the defendant’s
20 violation was at most negligent, recovery is limited to actual damages. *See* 15 U.S.C. §§
21 1681n(a)(1), 1681o(a)(1). Because Plaintiffs did not allege any actual damages, in order to
22 recover anything, Plaintiffs would have had to prove not only that Defendant violated the
23 FCRA, but that it did so willfully. Throughout this litigation, Defendant has vigorously
24 contested that it violated the FCRA, much less that it willfully violated it. *See Chakejian v.*
25 *Equifax Info. Servs., LLC*, 275 F.R.D. 201, 212 (E.D. Pa. 2011) (deeming willfulness in
26 FCRA case “a high hurdle to clear” which weighed in favor of settlement approval);
27 *Reibstein v. Rite Aid Corp.*, 761 F. Supp. 2d 241, 253 (E.D. Pa. 2011) (that willfulness
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1 presented “considerable—albeit not insurmountable—risks” weighed in favor of settlement
2 approval).

3 Plaintiffs believe that these arguments could have been overcome in litigation, but
4 also believes they demonstrate that there were serious obstacles to recovery in this case.

5 c. Counsel’s Experience and Skill.

6 Class Counsel are highly experienced in complex class action litigation and
7 consumer litigation in general. (See Drake Decl. ¶¶ 16-25.) Berger Montague was founded
8 in 1970, and has been concentrated on representing plaintiffs in complex class actions ever
9 since. (*Id.*) The firm has been recognized by courts for its skill and experience in handling
10 major complex litigation. (*Id.*) Berger has been recognized by The National Law Journal
11 in 11 of the last 15 years for its “Hot List” of top plaintiffs’ oriented litigation firms in the
12 nation. (*Id.*) Lead counsel from Berger, E. Michelle Drake, has worked extensively on
13 FCRA class actions, and Joseph C. Hashmall, also from Berger, has concentrated his
14 practice on FCRA litigation as well, and both are counsel of record in many active FCRA
15 cases throughout the country. (*Id.*)

16 d. The Reaction of the Class to Date is Positive.

17 Notice of the settlement, including the proposed amounts to be requested in fees,
18 costs, and service payments, was sent on February 5, 2025 to 35,607 individuals. Not a
19 single Settlement Class Member has filed an objection to the requested fees, costs, or service
20 awards to date, and only three have opted-out. (Drake Decl. ¶ 15.) The claims rate is also
21 well in line with claims rate in other consumer cases. See *Schneider v. Chipotle Mexican*
22 *Grill, Inc.*, 336 F.R.D. 588, 599 (N.D. Cal. 2020) (approving class action with a 0.83%
23 claims rate); *Theodore Broomfield v. Craft Brew Alliance, Inc.*, 2020 WL 1972505, at *7
24 (N.D. Cal. Feb. 5, 2020) (approving settlement with response rate of “about two percent”);
25 *Bostick v. Herbalife Int’l of Am., Inc.*, No. CV 13-2488 BRO, 2015 WL 12731932, at *27
26 (C.D. Cal. May 14, 2015) (approving settlement with “response rate of less than 1%”);
27 *Sullivan v. DB Invs., Inc.*, 667 F.3d 273, 329 n.60 (3d Cir. 2011) (en banc) (noting evidence
28

1 that claims rates in consumer class settlements “rarely” exceed 7%, “even with the most
2 extensive notice campaigns”). This factor thus supports the requested award. *Barbosa v.*
3 *Cargill Meat Solutions Corp.*, 297 F.R.D. 431, 448 (E.D. Cal. 2013) (finding only one opt-
4 out and zero objections from 1,837 class members favored awarding 33% of the common
5 fund); *Razilov v. Nationwide Mut. Ins. Co.*, No. 01-cv-1466, 2006 WL 3312024, at *3 (D.
6 Or. Nov. 13, 2006) (finding 27 opt-outs out of 60,000 class members weighed in favor of
7 granting fee award in excess of 25% benchmark); *Thieriot v. Celtic Ins. Co.*, No. 10-cv-
8 4462, 2011 WL 1522385, at *6 (N.D. Cal. April 21, 2011) (“[t]he fact that no members of
9 the 390-person class objected to the proposed 33% fee award – which was also
10 communicated in the notice – supports an increase in the benchmark rate.”).

11 e. Comparison with Class Counsel’s Lodestar.

12 A comparison with Class Counsel’s lodestar further demonstrates that the requested
13 fee is reasonable. *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1050 (9th Cir. 2002)
14 (“[L]odestar may provide a useful perspective on the reasonableness of a given percentage
15 award.”)). The “cross-check calculation need entail neither mathematical precision nor
16 bean counting...[courts] may rely on summaries submitted by the attorneys and need not
17 review actual billing records.” *Covillo v. Specialty’s Café*, 2014 WL 954516, at *21-22
18 (N.D. Cal. Mar. 6, 2014) (quoting *In re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294, 306-07 (3d
19 Cir. 2005)).

20 The lodestar method is calculated by multiplying “the reasonable hours expended
21 by a reasonable hourly rate.” *Wershba v. Apple Computer, Inc.*, 110 Cal. Rptr. 2d 145, 169
22 (Cal. App. 6th Dist. 2001). In considering rates, courts examine the rate “prevailing in the
23 community for similar services by lawyers of reasonably comparable skill, experience and
24 reputation.” *Blum v. Stenson*, 465 U.S. 886, 895 n.11 (1984). Here, Class Counsel’s hourly
25 rates are comparable to those approved in California. *See, e.g., Scott v. Blackstone*
26 *Consulting, Inc.*, 2024 WL 271439, *10 (S.D. Cal. Jan. 24, 2024) (finding rates ranging
27 from \$500 to \$925 to be reasonable); *In re Outlaw Lab’ys, LP Litig.*, 2023 WL 6522383,
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1 *4 (S.D. Cal. Oct. 5, 2023) (finding \$996 to be a reasonable rate for senior partners, and
2 \$855 a reasonable rate for less experienced attorneys); *Blount v. Host Healthcare, Inc.*, 2022
3 WL 1094616, *9 (S.D. Cal. April 12, 2022) (noting that courts have approved hourly rates
4 ranging from \$550 to more than \$1,000 per hour) (collecting cases); *Herring Networks, Inc.*
5 *v. Maddow*, 2021 WL 409724, *7 (S.D. Cal. 2021) (finding \$1,050-\$1,150 to be reasonable
6 rates for partners from top firm).

7 Class Counsel’s detailed fee records are attached to the Drake Declaration, with
8 redactions for privilege. (Drake Decl., Ex. 1.) To date, Counsel’s cumulative lodestar is
9 \$434,948.50. (Drake Decl. ¶ 9.) The lodestar cross-check of the percentage requested thus
10 results in a multiplier of 1.01. Essentially, Counsel are asking to be paid their normal rates,
11 despite taking this case on a contingency basis, and taking on the associated risks. Notably,
12 because the lodestar method is being used here only as a cross-check, *even if* the Court were
13 to conclude that a lower number of hours or lower hourly rates would be more appropriate,
14 a higher lodestar multiplier would still fall within the range of those routinely approved in
15 courts in this State, and would continue to support the requested fee. *See, e.g., Abdullah v.*
16 *U.S. Sec. Assocs., Inc.*, 2017 WL 11630767, *10 (C.D. Cal. Dec. 4, 2017) (approving fee
17 award of one-third of common fund, explaining that even after reducing class counsel’s
18 hourly rates and thereby using a more conservative lodestar, the higher lodestar multiplier
19 thus required was appropriate because “Class Counsel took this case on a contingent basis
20 and achieved a significant recovery for the class.”); *Good Morning to You Prods. Corp. v.*
21 *Warner/Chappell Music, Inc.*, 2016 WL 6156076, **15–16 (C.D. Cal. Aug. 16, 2016)
22 (reducing class counsel’s lodestar but nonetheless approving their fee request for one-third
23 of common fund where the higher lodestar multiplier required still fell within the range of
24 those frequently used).

25 Multipliers of 1 to 4 are commonly awarded in complex class action cases in the
26 Ninth Circuit. *See Vizcaino*, 290 F.3d at 1051, n.6 (finding that in approximately 83% of
27 cases surveyed by the court, the multiplier was between 1.0 and 4.0 and affirming a

1 multiplier of 3.65); *Wershba*, 110 Cal. Rptr. 2d at 170 (recognizing “[m]ultipliers can range
2 from 2 to 4 or even higher”); *Van Vranken v. Atlantic Richfield Co.*, 901 F. Supp. 294, 298
3 (N.D. Cal. 1995) (recognizing “[m]ultipliers in the 3-4 range are common”); *Steiner v.*
4 *American Broad. Co., Inc.*, 248 Fed. Appx. 780, 783 (9th Cir. 2007) (affirming multiplier
5 of 3.65); *McKenzie v. Federal Exp. Corp.*, 2012 WL 2930201 (C.D. Cal. July 2, 2012)
6 (approving multiplier of 3.2). The requested multiplier here is therefore quite reasonable.

7 The lodestar cross-check thus confirms the reasonableness of the requested fee
8 award.

9 **2. Class Counsel’s Litigation Costs are Recoverable.**

10 Class Counsel also seek, and Defendant does not oppose, reimbursement of
11 documented out-of-pocket expenses incurred in litigating and settling this matter. *See*
12 *Harris v. Marhoefer*, 24 F.3d 16, 19 (9th Cir. 1994) (counsel should recover “those out-of-
13 pocket expenses that would normally be charged to a fee paying client”) (citation and
14 internal quotation marks omitted); *Ashker v. Sayre*, 2011 WL 825713, at *3 (N.D. Cal.
15 March 7, 2011) (finding “costs of reproducing pleadings, motions and exhibits are typically
16 billed by attorneys to their fee-paying clients” and are thus reimbursable); *Trustees of Const.*
17 *Indus. & Laborers Health & Welfare Trust v. Redland Ins. Co.*, 460 F.3d 1253, 1258-59
18 (9th Cir. 2006) (legal research costs reimbursable); *In re Immune Response Secs. Litig.*, 497
19 F. Supp. 2d 1166, 1177-8 (S.D. Cal. 2007) (mediation expenses, expert fees, legal research,
20 copies, postage, filing fees, messenger, and federal express costs reimbursable); *Marhoefer*,
21 24 F.3d at 19 (postage costs reimbursable).

22 All of the costs incurred by Class Counsel were reasonable and necessary to the
23 successful conclusion of this litigation. (*See* Drake Decl. ¶ 12.) These costs include:
24 mediation costs, filing fees, legal research, service of process, copying, and FedEx costs.

25 These types of expenses are routinely reimbursed by the courts as noted above, thus
26 Counsel’s requested costs of up to \$11,769.94 should be awarded. In addition, American
27 Legal Claim Services, who this Court appointed to administer the settlement, reasonably

1 expects to incur \$97,991 by the end of the settlement administration process. (Drake Decl.
2 ¶ 14.) These expenses are reasonable and should be approved.

3 **B. THE REQUESTED SERVICE PAYMENTS ARE APPROPRIATE.**

4 California courts recognize that a named plaintiff is eligible for a reasonable service
5 payment. *Cellphone Termination Fee Cases*, 113 Cal. Rptr. 3d 510, 521 (Cal. App. 1st
6 Dist. 2010) (service payments “are fairly typical in class action cases.”) (citing *Rodriguez*
7 *v. West Pub. Corp.*, 563 F.3d 948, 958 (9th Cir. 2009)). Such awards are intended to
8 compensate class representatives for work done on behalf of the class, to make up for
9 financial or reputational risk undertaken in bringing the action, and to recognize their
10 willingness to act as private attorneys general. *Id.* “[C]riteria courts may consider in
11 determining whether to make an incentive award include: 1) the risk to the class
12 representative in commencing suit, both financial and otherwise; 2) the notoriety and
13 personal difficulties encountered by the class representative; 3) the amount of time and
14 effort spent by the class representative; 4) the duration of the litigation and; 5) the personal
15 benefit (or lack thereof) enjoyed by the class representative as a result of the litigation.” *Id.*
16 at 522.

17 Here, Plaintiffs expended much time and effort (all Plaintiffs estimate 40 hours or
18 more) on behalf of the Class. They reached out to, and worked with, Class Counsel, and
19 actively participated and providing valuable input at every step in this litigation. (Wilson
20 Decl., Walker Decl., Clark Decl., ¶¶ 7-10.) Plaintiffs were fully prepared to further
21 participate if this matter did not settle. As a result of Plaintiffs’ efforts, and their willingness
22 to pursue this action, substantial benefits have been achieved on behalf of the Settlement
23 Class. Aside from the requested service payments, Plaintiffs will not gain any benefit not
24 enjoyed by other Settlement Class Members. An incentive award is appropriate when a
25 class representative will not gain any benefit beyond what he would receive as an ordinary
26 class member. *See In re Toys R Us-Delaware, Inc.--Fair & Accurate Credit Transactions*
27 *Act (FACTA) Litig.*, 295 F.R.D. 438, 472 (C.D. Cal. 2014) (“An incentive award may be
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1 appropriate when a class representative will not gain any benefit beyond that he would
2 receive as an ordinary class member.”); *Van Vranken*, 901 F. Supp. at 299 (finding incentive
3 award supported by named plaintiffs’ modest recovery under the settlement agreement,
4 which was only a “tiny fraction” of the common fund); *Razilov*, 2006 WL 331204 at *4
5 (approving payment of incentive award where only benefit class representative received
6 from settlement was same statutory damages other class members received).

7 Moreover, the requested service payments of \$5,000 to each of the Named Plaintiffs
8 are modest compared to awards granted in other complex litigation. *See, e.g., Nesbitt v.*
9 *Postmates, Inc.*, No. CGC-15-547146 (Cal. Sup. Ct. San. Fran. Cnty. Nov. 8, 2017)
10 (providing for incentive awards of \$6,500 and \$3,500); *Mount v. Wells Fargo Bank, N.A.*,
11 2016 WL 537604, at *4 (Cal. App. 2d Dist. Feb. 10, 2016) (approving incentive award of
12 \$10,000 each for both named plaintiffs); *Ralston v. Mortg. Investors Grp., Inc.*, No. 08-cv-
13 536, 2013 WL 5290240, at *5 (N.D. Cal. Sept. 19, 2013) (approving service payment of
14 \$12,500); *In re Netflix Privacy Litig.*, No. 11-cv-379, 2013 WL 1120801, at *11 (N.D. Cal.
15 March 18, 2013) (approving service payments of \$6,000 for each named plaintiff);
16 *Vedachalam v. Tata Consultancy Servs. Ltd.*, No. 06- cv-0963, 2013 WL 3929129, at *7
17 (N.D. Cal. July 18, 2013) (approving service payments of \$25,000 and \$35,000).

18 The notices sent in this matter specified the service payment Plaintiffs would seek,
19 and no Class Member has objected. The service payments are fully justified, reasonable,
20 and should be awarded.

21 **VII. CONCLUSION**

22 Based on the foregoing, Plaintiffs respectfully request that the Court grant Class
23 Counsel’s requested awards of 25% of the Settlement Fund as attorneys’ fees
24 (\$441,250.00), \$11,769.94 in costs, service payments to the Named Plaintiffs of \$5,000
25 each, for a total of \$15,000, and \$97,991 in settlement administration expenses.

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Date: May 7, 2025

Respectfully submitted,

BERGER MONTAGUE PC

/s/E. Michelle Drake
E. Michelle Drake (*pro hac vice*)

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9 *Attorneys for Plaintiffs*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
COUNTY OF SAN MATEO
11 **UNLIMITED CIVIL**

12 DAVID WALKER, MELISSA CLARK, and
13 BENJAMIN WILSON, individually and as
representatives of the Class,

14 Plaintiffs,

15 vs.

16
17 INFLECTION RISK SOLUTIONS, LLC,

18 Defendant.
19
20

Case No. 22-CIV-02954

**DECLARATION OF E. MICHELLE
DRAKE IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, COSTS, AND CLASS
REPRESENTATIVE SERVICE
PAYMENTS**

Assigned for All Purposes to Hon. Don R.
Franchi

Date: August 18, 2025
Time: 3:00 p.m.
Department: 15

21
22 I, E. Michelle Drake, declare as follows:

23 1. I am one of Class Counsel in the above-captioned matter.

24 2. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs,
25 and Class Representative Service Payments.

26 **Class Counsel's Efforts in Litigation and Settlement**
27
28

1 3. Plaintiffs and Class Counsel have invested a substantial amount of time and
2 resources investigating and litigating this action. After being contacted by Plaintiffs, Class Counsel
3 fully investigated Plaintiffs' claims, drafted and filed the Complaint.

4 4. Early in the litigation, the Parties commenced informal exchanges of information,
5 and Defendant provided data samples which Plaintiffs reviewed and analyzed. This analysis was a
6 complex multi-step process, wherein the Plaintiffs received an initial data set from Defendant.
7 Plaintiffs then engaged in extensive meet and confers with Defendant regarding the meaning of the
8 data and the availability of additional data. Based on these meet-and-confers, Defendant produced
9 a supplemental data set. Plaintiffs then analyzed the initial data and the supplemental data,
10 comparing those data sets to public record data, and consulting with experts regarding the data sets
11 and how they could be used and reviewed on a class-wide basis.

12 5. Class Counsel drafted the Settlement Agreement and the preliminary approval
13 papers, and attended the preliminary approval hearing.

14 6. Since preliminary approval, Class Counsel have been deeply involved in the
15 administration of the settlement, including the review of claim validity. Staff at my firm have
16 reviewed each SOR Report Group claimant's claim and any supporting documentation, against
17 public sex offender registry records, and made a validity designation based on whether a
18 combination of the claimant's full name, date of birth, address appear on the given state, or national,
19 sex offender registry. Class Counsel understands that Defendant's counsel will be reviewing
20 validity determinations as well, for a second-level review.

21 7. Additional tasks Class Counsel expects to perform include continuing to oversee the
22 administration of the Settlement, including claims review through the deadline for claims validity
23 determinations as outlined by the Settlement Agreement, researching and drafting final approval
24 papers, preparing for the final fairness hearing, arguing at the final fairness hearing, and overseeing
25 the distribution of the Settlement funds.

26 8. Class Counsel have litigated this case entirely on a contingency basis and have thus
27 far received no compensation for their time or out-of-pocket costs.

28

9. To date, Class Counsel have devoted over 656 hours to this matter. The value of this time at Class Counsel's normal hourly rates is \$434,948.50. A summary timekeeper table is below, and detailed fee entries (redacted for privilege) are attached hereto as **Exhibit 1**.

Timekeeper	Position	Atty. Yrs. of Exp.	Hours Worked	Hourly Rate	Lodestar
Hashmall, Joseph	Senior Counsel	15	287	\$795	\$228,165
Hibray, Jean	Paralegal		111.8	\$500	\$55,900
Howland, Nicholas	Legal Project Analyst		68	\$340	\$23,120
Drake, E. Michelle	Executive Shareholder	24	66	\$1180	\$77,880
Brooks, Rachel K	Legal Project Analyst		62.1	\$340	\$21,114
Mahmood, Talia	Legal Project Analyst		40.8	\$340	\$13,872
Albanese, John	Shareholder	13	11.6	\$895	\$10,382
McClain, Michael	Counsel	15	2.5	\$350	\$875
Rios, Sophia M	Shareholder	10	2.2	\$820	\$1,804
Fena, Jocelyn	Legal Assistant		1.8	\$280	\$504
Gionnette, Julie	Legal Assistant		1.5	\$305	\$457.50
Bolos, Sylvia S	Counsel	10	1.4	\$535	\$749
Marsnik, Ivy	Counsel	3	0.2	\$630	\$126
Totals			656.9		\$434,948.50

10. Class Counsel's time records are maintained in accordance with industry standards to ensure reliability and transparency. The firm's formal policy requires all timekeepers—including attorneys and support staff—to keep records of time worked contemporaneously and to provide sufficient detail to convey the nature and merit of the work performed. To ensure each time entry contains sufficient detail, the firm requires time entries to include both matter numbers (corresponding to the specific case) and task codes (corresponding to the type of work performed). Timekeepers are also required to provide narrative descriptions setting forth the case-specific tasks associated with each time entry. This manner of timekeeping, with contemporaneous records and detailed descriptions broken down by task, provides a level of accountability that courts nationwide routinely recommend when scrutinizing applications for attorneys' fees. *Deary v. City of*

1 *Gloucester*, 9 F.3d. 191, 197-98 (1st Cir. 1993) (“In order to recover fees, attorneys must submit a
2 full and precise accounting of their time, including specific information about number of hours,
3 dates, and the nature of the work performed.”); *Bode v. United States*, 919 F.2d 1044, 1047 (5th
4 Cir. 1990) (collecting cases) (“[C]ourts customarily require the applicant to produce
5 contemporaneous billing records or other sufficient documentation so that the district court can
6 fulfill its duty to examine the application....”).

7 11. Importantly, Class Counsel’s lodestar does not reflect the full extent of Class
8 Counsel’s efforts outside of this case that ultimately benefited the Class. In addition to work
9 performed specifically in this matter, my firm monitors every new FCRA case that is filed on a
10 daily basis, tracks every FCRA class action case, and reviews every FCRA opinion issued anywhere
11 in the country. This ongoing monitoring and research allowed Class Counsel to effectively assess
12 the reasonability of the recovery in this matter and motivated Class Counsel to negotiate a
13 settlement.

14 12. To date, Class Counsel have incurred \$11,769.94 in out-of-pocket litigation costs.
15 All of these costs were necessarily incurred and are of the type typically reimbursed by paying
16 clients. A summary table is below, showing the costs by category:

Category	Amount
Filing & Misc. Fees	\$7,641.27
Mediation Fees	\$3,795.00
Computer Research	\$146.65
Process Server	\$105.00
DocuSign	\$44.64
Printing	\$24.85
Postage	\$12.53
Total	\$11,769.94

24 13. Computer research charges were all for Westlaw. My firm has negotiated a fixed
25 monthly payment to Westlaw for usage of Westlaw’s legal research database and tools. The firm’s
26 fixed-monthly fee with Westlaw results in the firm paying rates that are well below what the firm
27 would incur if it paid Westlaw’s market rates on a per transaction basis. The firm does not mark-
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1 up Westlaw research charges to clients/matters. In order to allocate the monthly charge among its
2 clients, Berger Montague requires users to enter client/matter billing numbers each time the user
3 begins a Westlaw session on behalf of a client. The firm then obtains the per-transaction amount
4 that, but for Berger Montague's monthly contract, Westlaw would have charged for the resources
5 used during that session (the "gross charge"). At the end of each month, the costs for all transactions
6 are added up so that each client/matter billing number has an associated case-specific gross charge.
7 The monthly fee for the firm's subscription to Westlaw is then split equally client/matter's share of
8 the gross charges. So, for example, if, for the month of May, Client A has a gross charge of
9 \$100,000, Client B has a gross charge of \$300,000, and Client C has a gross charge of \$600,000,
10 the Firm's monthly fee to Westlaw (which would be less than \$1,000,000) would be apportioned
11 as follows: 10% to Client A, 30% to Client B, and 60% to Client C.

12 14. The estimated costs of settlement administration in this matter (which are not
13 included in the litigation cost totals) are anticipated not to exceed \$97,991.

14 **Current Status of Class Response to Notice**

15 15. Based on information provided to Class Counsel by the Settlement Administrator,
16 the class list provided by Defendant indicated the Name & DOB Match Group contains 2,901
17 individuals, the SOR Report Group contains 32,380 individuals, and the Successful Disputes Group
18 contains 326 individuals. On February 5, 2025, the Settlement Administrator sent Notice to the
19 35,607 Settlement Class Members in accordance with the procedures outlined in the Settlement
20 Agreement. On the same date, the Administrator also activated the Settlement Website. On April
21 30, 2025, the Administrator sent a reminder notice to Settlement Class Members who had not yet
22 submitted a claim. As of April 23, 2025, there have been approximately 428 valid claims submitted,
23 three opt-outs and zero objections received. While claims are still being accepted and reviewed,
24 the current figures result in a valid claims rate of approximately 5% for the Name & DOB Match
25 Group and 1% for the SOR Report Group. Not a single Settlement Class Member has filed an
26 objection to the requested fees, costs, or Class Representative service awards to date, and only three
27 have opted-out.

28 **Counsel's Qualifications & Experience**

1 16. I am an Executive Shareholder at Berger Montague PC. I have been practicing law
2 since 2001 and am a graduate of Harvard College, Oxford University, and Harvard Law School. In
3 2016, I joined Berger Montague as a Shareholder and in 2021 I was made an Executive Shareholder.
4 Prior to joining Berger Montague, I was a partner at Nichols Kaster, PLLP, and ran that firm's
5 consumer protection group.

6 17. Joseph C. Hashmall is Senior Counsel at Berger Montague. He is a graduate of
7 Grinnell College and the Cornell University School of Law. While at Cornell, he served as the
8 Executive Editor of the Cornell Legal Information Institute's Supreme Court Bulletin and as an
9 Editor for the Cornell International Law Journal. Mr. Hashmall has also worked as a law clerk
10 for President Judge Bonnie B. Leadbetter of the Pennsylvania Commonwealth Court and for
11 the Honorable David J. Ten Eyck of the Minnesota District Court. At Berger Montague, Mr.
12 Hashmall is a part of the firm's Consumer Protection & Mass Tort Department. He has been
13 actively involved in litigation of Fair Credit Reporting Act claims in particular, for over ten years.

14 18. Berger Montague specializes in class action litigation and is one of the preeminent
15 class action law firms in the United States. The firm currently consists of over 60 attorneys who
16 primarily represent plaintiffs in complex civil litigation, and class action litigation, in federal and
17 state courts. Berger Montague has played lead roles in major class action cases for over 50 years
18 and has obtained settlement and recoveries totaling well over \$30 billion for its clients and the
19 classes they have represented.

20 19. I serve as chair of the Background Checks and Credit Reporting Department, and as
21 co-chair of the firm's Consumer Protection & Mass Tort Department. My practice focuses on
22 protecting consumers' rights when they are injured by improper credit reporting, and other illegal
23 business practices. I currently serve as lead or co-lead counsel in numerous class action consumer
24 protection cases in federal and state courts across the country, including numerous cases brought
25 pursuant to the Fair Credit Reporting Act.

26 20. I serve on the Board of the Southern Center for Human Rights, am a member of the
27 Partner's Council of the National Consumer Law Center and am a former Co-Chair of the Consumer
28 Litigation Section for the Minnesota State Bar Association, and a former Board Member of the

1 National Association of Consumer Advocates. I have previously served as a member of the Ethics
2 Committee for the National Association of Consumer Advocates, and as Treasurer and At-Large
3 Council Member for the Consumer Litigation Section of the Minnesota State Bar Association. I
4 was also an appointee to the Federal Practice Committee in 2010 by the U.S. District Court for the
5 District of Minnesota.

6 21. I was named to the LawDragon 500 Leading Plaintiff Financial Lawyers List for
7 2019, and a 2020 Elite Woman of the Plaintiffs Bar by the National Law Journal. I am consistently
8 named to the annual lists of The Best Lawyers of America, Top 50 Women Minnesota Super
9 Lawyers, and Super Lawyers. I have been quoted in the New York Times, and the National Law
10 Journal, and have had prior cases named as “Lawsuits of the Year” by Minnesota Law & Politics.

11 22. I present frequently at national and local conferences on class actions, consumer
12 protection, and Fair Credit Reporting Act-related topics, and I co-authored a book chapter on
13 background checks and related issues, “Financial and Criminal Background Checks,” Job Applicant
14 Screening: A Practice Guide, Minnesota Continuing Legal Education Publication, May 2014, and
15 the forthcoming 2d. ed. I was a contributing author to “Consumer Law,” The Complete Lawyer’s
16 Quick Answer Book, Minnesota Continuing Legal Education Publication, 2d. ed., 2019, and
17 “Chapter 1: Case and Claims Selection, Other First Considerations,” Consumer Class Actions,
18 National Consumer Law Center, 10th ed., 2019. My recent speaking engagements have included:

- 19 ▪ “National FCRA Landscape,” National Association of Consumer Advocates
20 Spring Training, May 2022.
- 21 ▪ “Sealing, Expungement and FCRA: Criminal Records Reporting in a New Era,”
22 Equal Justice Conference, May 2022.
- 23 ▪ “Evidentiary Challenges in Certifying Class Actions,” Class Action Symposium,
24 Consumer Rights Litigation Conference, National Consumer Law Center,
25 December 2021.
- 26
- 27
- 28

- 1 ▪ “COVID and Post-COVID Issues in FCRA Litigation,” National Association of
2 Consumer Advocates Spring Training, Virtual, April 2021.
- 3 ▪ “Consumer Law: Overview of the Fair Credit Reporting Act,” Minnesota
4 Continuing Legal Education, Virtual, December 2020.
- 5 ▪ “The Role of the Lawyer in Class Actions,” Panel Chair, Global Class Actions
6 Symposium 2020, Virtual, November 2020.
- 7 ▪ “Hunting the Snark: Finding & Effectively Using Data to Certify Classes,” Class
8 Action Symposium, National Consumer Law Center Consumer Rights Litigation
9 Conference, Virtual, November 2020.
- 10 ▪ “Specialty CRAs Part 1: Conviction Histories, Expungement, and FCRA: Keeping
11 up with Developments in a Changing Legal Landscape,” National Consumer Law
12 Center Consumer Rights Litigation Conference, Virtual, November 2020.
- 13 ▪ “Conducting Financial & Criminal Background Checks – Applicant Rights and
14 Employer Best Practices,” Minnesota Continuing Legal Education, Minneapolis,
15 MN, October 2020.

16 23. I litigate cases throughout the United States and have been admitted to, and am a
17 member in good standing with, the following courts:

- 18 ▪ United States Supreme Court, 2017
- 19 ▪ State Bar of Georgia, 2001
- 20 ▪ Georgia Supreme Court, 2006
- 21 ▪ Minnesota Supreme Court, 2007
- 22 ▪ U.S. Court of Appeals for the Eighth Circuit, 2010
- 23 ▪ U.S. Court of Appeals for the First Circuit, 2011
- 24 ▪ U.S. Court of Appeals for the Seventh Circuit, 2014
- 25 ▪ U.S. Court of Appeals for the Ninth Circuit, 2015
- 26 ▪ U.S. Court of Appeals for the Tenth Circuit, 2018
- 27 ▪ U.S. Court of Appeals for the Third Circuit, 2019
- 28 ▪ U.S. District Court for the Northern District of Georgia, 2007

- 1 ▪ U.S. District Court for the District of Minnesota, 2007
- 2 ▪ U.S. District Court for the Eastern District of Wisconsin, 2011
- 3 ▪ U.S. District Court for the Western District of Texas, 2011
- 4 ▪ U.S. District Court for the Western District of Wisconsin, 2015
- 5 ▪ U.S. District Court for the Eastern District of Michigan, 2015
- 6 ▪ U.S. District Court for the Central District of Illinois, 2016
- 7 ▪ U.S. District Court for the Southern District of Texas, 2017
- 8 ▪ U.S. District Court for the District of Colorado, 2017
- 9 ▪ U.S. District Court for the Western District of New York, 2017
- 10 ▪ U.S. District Court for the Western District of Michigan, 2018
- 11 ▪ U.S. District Court for the Northern District of Illinois, 2020

12 24. I have served as lead, or co-lead, class counsel in numerous notable FCRA matters,
13 including, but not limited to, the following:

14
15 *Gambles v. Sterling Infosystems, Inc.*, No. 15-cv-9746 (S.D.N.Y.) FCRA class
16 action, alleging violations by consumer reporting agency, resulting in a gross
settlement of \$15 million, one of the largest FCRA settlements to date.

17 *In re: TransUnion Rental Screening Sols., Inc. FCRA Litig.*, No. 1:20-md-02933-
18 JPB (N.D. Ga.). Appointed as Interim Lead Counsel for the classes in multi-district
litigation consolidated class action, regarding violations of the Fair Credit Reporting
19 Act.

20 *Thomas v. Equifax Info. Services, LLC*, No. 18-cv-684 (E.D. Va.). FCRA class
21 action, alleging violations by credit bureau, providing nationwide resolution of class
action claims asserted across multiple jurisdictions, including injunctive relief, and
22 an uncapped mediation program for millions of consumers.

23 *Clark v. Experian Info. Sols., Inc.*, No. 16-cv-32 (E.D. Va.). FCRA class action,
24 alleging violations by credit bureau, providing a nationwide resolution of class
action claims asserted by 32 plaintiffs in 16 jurisdictions, including injunctive relief
25 and an uncapped mediation program, for millions of consumers.

26 *Clark/Anderson v. Trans Union, LLC*, No. 15-cv-391 & No. 16-cv-558 (E.D. Va.).
27 FCRA consolidated class action, alleging violations by credit bureau, providing
groundbreaking injunctive relief, and an opportunity to recover monetary relief, for
28 millions of consumers.

1 *Riley v. MoneyMutual, LLC*, No. 16-cv-4001 (D. Minn.). Court certified a litigation
2 class of over 20,000 Minnesota consumers alleging that MoneyMutual violated
3 Minnesota payday lending regulations, resulting in \$2,000,000 settlement with
4 notable injunctive relief.

5 *Lee v. The Hertz Corp.*, No. CGC-15-547520 (Cal. Super. Ct., San Fran. Cnty.).
6 FCRA class action, alleging violations by employer, resulting in \$1.619 million
7 settlement.

8 *Rubio-Delgado v. Aerotek, Inc.*, No. 16-cv-1066 (S.D. Ohio). FCRA class action,
9 alleging violations by employer, resulting in a \$15 million settlement.

10 *Knights v. Publix Super Markets, Inc.*, No. 14-cv-720 (M.D. Tenn.). FCRA class
11 action, alleging violations by employer, resulting in a \$6.75 million settlement.

12 *Hillson v. Kelly Services, Inc.*, No. 15-cv-10803 (E.D. Mich.). FCRA class action,
13 alleging violations by employer, resulting in a \$6.749 million settlement.

14 *Ernst v. DISH Network, LLC & Sterling Infosystems, Inc.*, No. 12-cv-8794
15 (S.D.N.Y.). FCRA class action, alleging violations by employer and consumer
16 reporting agency, resulting in a \$4.75 million settlement with consumer reporting
17 agency, and a \$1.75 million settlement with employer.

18 *Howell v. Checkr, Inc.*, No. 17-cv-4305 (N.D. Cal.). FCRA class action, alleging
19 violations by consumer reporting agency, resulting in a \$4.46 million settlement.

20 *Brown v. Delhaize America, LLC*, No. 14-cv-195 (M.D.N.C.). FCRA class action,
21 alleging violations by employer, resulting in \$2.99 million settlement.

22 *Nesbitt v. Postmates, Inc.*, No. CGC-15-547146 (Cal. Super. Ct., San Fran. Cnty.).
23 FCRA class action, alleging violations by employer, resulting in a \$2.5 million
24 settlement.

25 *Singleton v. Domino's Pizza, LLC*, No. 11-cv-1823 (D. Md.). FCRA class action,
26 alleging violations by employer, resulting in a \$2.5 million settlement.

27 *Heaton v. Social Finance, Inc.*, No. 14-cv-5191 (N.D. Cal.). FCRA class action,
28 alleging violations by lender, resulting in a \$2.5 million settlement.

Terrell v. Costco Wholesale Corp., No. 10-2-33915-9 (Wash. Super. Ct., King
Cnty.). FCRA class action, alleging violations by employer, resulting in a \$2.49
million settlement.

Halvorson v. TalentBin, Inc., No. 15-cv-5166 (N.D. Cal.). FCRA class action,
alleging violations by online data aggregator, resulting in a \$1.15 million settlement.

1 *Legrand v. IntelliCorp Records, Inc.*, No. 15-cv-2091 (N.D. Ohio). FCRA class
2 action, alleging violations by consumer reporting agency, resulting in a \$1.1 million
3 settlement.

4 25. My litigation efforts and experience have received judicial acknowledgement and
5 praise throughout the years of my practice. Examples of such recognition include:

6 From Judge Paul A. Engelmayer, United States District Court, Southern District of
7 New York:

8 I know the diligence of counsel and dedication of counsel to the class...Thank you,
9 Ms. Drake. As always I appreciate the—your extraordinary dedication to your – to
10 the class and the very obvious backwards and forwards familiarity you have with
11 the case and level of preparation and articulateness today. It’s a pleasure always to
12 have you before me...Class counsel [] generated this case on their own initiative and
13 at their own risk. Counsel’s enterprise and ingenuity merits significant
14 compensation...Counsel here are justifiably proud of the important result that they
15 achieved.

16 Sept. 22, 2020, Final Approval Hearing, *Gambles v. Sterling Info., Inc.*, No. 15-cv-
17 9746.

18 From Judge Harold E. Kahn, Dep’t 302, Superior Court of Cal., San Fran. Cnty.:

19 You’re very articulate on this issue. ... Obviously, you’re very thoughtful
20 and you have given it a great deal of thought. ... And I appreciate your ability
21 to respond to my questions off the cuff. ... It shows that you have given these
22 issues a lot of thought ... I have to say that your thoughtfulness this morning
23 has somewhat diminished my concerns [regarding high multiplier on
24 attorney fees]... You’re demonstrating credibility by a mile as you go....You
25 are extraordinarily impressive. And I thank you for being here, and for your
26 candid, noninvasive [sic] response to every question I have. I was extremely
27 skeptical at the outset this morning. You have allayed all of my concerns
28 and have persuaded me that this is an important issue, and that you have done
a great service to the class. And for that reason, I am going to approve your
settlement in all respects... And I congratulate you on your excellent work.

Nov. 7, 2017, Final Approval Hearing, *Nesbitt v. Postmates, Inc.*, No. CGC-15-
547146.

From Judge Laurie J. Michelson, United States District Court, E.D. Mich.:

1 Counsel's quality of work in this case was high. The Court has been
2 impressed with counsel's in-court arguments. And counsel has provided the
Court with quality briefing as well.

3 Aug. 11, 2017, Opinion & Order on Mtn. for Atty. Fees, and Mtn. for Final
4 Approval, *Hillson v. Kelly Services, Inc.*, No. 15-cv-10803.

5 From Magistrate Judge Terence P. Kemp, United States District Court, S.D. Ohio:

6 The parties in this case are represented by counsel with substantial
7 experience in class action litigation, and FCRA cases in particular. ... Class
8 Counsel are experienced and knowledgeable in FCRA litigation, are skilled,
and are in good standing.

9 June 30, 2017, Report & Recomm'n. on Final Approval, *Rubio-Delgado v. Aerotek,*
10 *Inc.*, No. 16-cv-1066.

11 From Judge Paul A. Magnuson, United States District Court, D. Minn.:

12 [T]he class representatives and their counsel more than adequately protected
13 the class's interests. ... [T]he comprehensive nature of the settlement in turn,
14 reflects the adequacy, indeed the superiority, of the representation the class
15 received from its named Plaintiffs and from class counsel.

16 May 17, 2017, Mem. & Order on Mtn. to Certify Class, *In re Target Corp. Customer*
17 *Data Sec. Breach Litig.*, MDL No. 14-2522.

18 From Judge Paul A. Engelmayer, United States District Court, S.D.N.Y.:

19 The high quality of [plaintiffs' counsel]'s representation strongly supports
20 approval of the requested fees. The Court has previously commended
21 counsel for their excellent lawyering. ...The point is worth reiterating here.
22 [Plaintiffs' counsel] was energetic, effective, and creative throughout this
23 long litigation. The Court found [Plaintiffs' counsel]'s briefs and arguments
24 first-rate. And the documents and deposition transcripts which the Court
25 reviewed in the course of resolving motions revealed the firm's far-sighted
and strategic approach to discovery. ... Further, unlike in many class actions,
26 plaintiffs' counsel did not build their case by piggybacking on regulatory
27 investigation or settlement. ... The lawyers [] can genuinely claim to have
28 been the authors of their clients' success.

29 Sept. 22, 2015, Final Approval Order, *Hart v. RCI Hospitality Holdings, Inc.*, No.
30 09-cv-3043.

1 From Magistrate Judge Laurel Beeler, United States District Court, N.D. Cal.:

2 Counsel have worked vigorously to identify and investigate the claims in this
3 case, and, as this litigation has revealed, understand the applicable law and
4 have represented their clients vigorously and effectively.

5 June 13, 2014, Order Granting Mtn. for Class Cert., *Ellsworth v. U.S. Bank, N.A.*,
6 No. 12-cv-2506.

7 From Judge Richard H. Kyle, United States District Court, D. Minn.:

8 Well, I think you did a great job on this. I mean, I really do. ... it seems to
9 me you folks have gotten it done the right way.

10 Jan. 6, 2014, Prelim. Approval Hearing, *Bible v. General Revenue Corp.*, No. 12-
11 cv-1236.

12 From Judge Deborah Chasanow, United States District Court, D. Md.:

13 [plaintiffs' counsel] are qualified, experienced, and competent, as evidenced
14 by their background in litigating class-action cases involving FCRA
15 violations. ... As noted above, Plaintiffs' attorneys are experienced and
16 skilled consumer class action litigators who achieved a favorable result for
17 the Settlement Classes.

18 Oct. 2, 2013, Final Approval Order, *Singleton v. Domino's Pizza, LLC*, No. 11-
19 cv1823.

20 From Judge Lorna G. Schofield, United States District Court, S.D.N.Y.:

21 [Plaintiffs' Counsel] has demonstrated it is able fairly and adequately to
22 represent the interests of the putative class.

23 July 23, 2013, Order Appointing Interim Lead Counsel, *Ernst v. DISH Network,*
24 *LLC*, No. 12-cv-8794.

25 From Judge Susan M. Robiner, Minnesota District Court, Henn. Cnty.:

26 Plaintiffs' counsel are adequate legal representatives for the class. They have
27 done work identifying and investigating potential claims, have handled class
28 actions in the past, know the applicable law, and have the resources
necessary to represent the class. The class will be fairly and adequately
represented.

1 Oct. 16, 2012, Order Granting Mtn. for Class Cert., *Spar v. Cedar Towing &*
2 *Auction, Inc.*, No. 27-CV-411-24993.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5 Executed on the 7th day of May, 2025, at Minneapolis, Minnesota.

6
7 /s/E. Michelle Drake

8 E. Michelle Drake
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EXHIBIT 1

Employee	Date	Task Code	Hours	Amount	Rate	Narrative
Bolos, Sylvia S	3/12/2022	L100	0.70	374.50	535	Reviewed the matter file and the Inflection Risk report. [REDACTED]
Bolos, Sylvia S	3/12/2022	L100	0.20	107.00	535	Researched Westlaw [REDACTED]
Bolos, Sylvia S	3/12/2022	L100	0.20	107.00	535	Received and reviewed Ms. Sarvady's intake notes regarding [REDACTED] Conferred with Jocelyn regarding [REDACTED]
Bolos, Sylvia S	3/14/2022	L100	0.10	53.50	535	[REDACTED]
Bolos, Sylvia S	3/21/2022	L110	0.20	107.00	535	Discussed [REDACTED] during the class review meeting
Hashmall, Joseph	3/22/2022	L100	0.80	636.00	795	Call with potential client, internal emails regarding [REDACTED] Internal email regarding [REDACTED], emails to client regarding [REDACTED],
Hashmall, Joseph	3/24/2022	L120	0.80	636.00	795	review [REDACTED]
Hibray, Jean	3/24/2022	L140	0.20	100.00	500	Prepare retainer, [REDACTED].
Hashmall, Joseph	3/28/2022	L200	2.10	1,669.50	795	Drafting complaint
Hashmall, Joseph	3/28/2022	L120	0.20	159.00	795	Internal emails regarding [REDACTED]
Hashmall, Joseph	3/29/2022	L200	0.10	79.50	795	Internal email regarding draft complaint
Hashmall, Joseph	3/30/2022	L200	0.10	79.50	795	Internal email regarding draft complaint
Hashmall, Joseph	3/31/2022	L200	0.10	79.50	795	Internal email regarding draft complaint
Hashmall, Joseph	4/1/2022	L200	0.10	79.50	795	Internal email regarding draft complaint
Drake, E.Michelle	4/2/2022	L210	0.90	1,062.00	1180	review redline and revise draft complaint
Hashmall, Joseph	4/4/2022	L200	0.10	79.50	795	Email to Sophia Rios regarding filing of complaint
Hashmall, Joseph	4/4/2022	L200	1.00	795.00	795	Review of Michelle Drake's edits to complaint, further edits to same
Hashmall, Joseph	4/4/2022	L200	0.20	159.00	795	Email to client regarding [REDACTED] [REDACTED] Prepared and sent [REDACTED]; edited [REDACTED] [REDACTED]; and e-mailed [REDACTED]
Brooks, Rachel K	4/6/2022	L100	0.40	136.00	340	[REDACTED]
Drake, E.Michelle	4/6/2022	L120	0.1	118.00	1180	Litigation team meeting
Hashmall, Joseph	4/6/2022	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	4/6/2022	L200	0.30	238.50	795	Emails with client regarding [REDACTED]
Hashmall, Joseph	4/8/2022	L100	0.20	159.00	795	Email to Sophia Rios regarding facts of case, supporting documents
Rios, Sophia M	4/8/2022	L100	1.10	902.00	820	Review draft complaint and supporting documents before filing.
Hashmall, Joseph	4/11/2022	L200	0.50	397.50	795	Review of Sophia Rios' edits to complaint, emails regarding same
Rios, Sophia M	4/11/2022	L100	0.80	656.00	820	Review draft complaint and supporting documents before filing.
Hashmall, Joseph	4/14/2022	L200	0.30	238.50	795	Call with Sophia Rios regarding draft complaint
Rios, Sophia M	4/14/2022	L100	0.30	246.00	820	Discuss [REDACTED] with JH [REDACTED]: Reviewed [REDACTED]; [REDACTED] discussed [REDACTED]
Brooks, Rachel K	4/21/2022	L100	0.50	170.00	340	[REDACTED] with Jocelyn Sarvady.
Hashmall, Joseph	4/28/2022	L200	0.30	238.50	795	Internal emails regarding filing of draft complaint
Drake, E.Michelle	5/3/2022	L120	0.1	118.00	1180	Litigation team meeting

Hashmall, Joseph	5/3/2022	L120	0.10	79.50	795	Litigation team meeting Talked on the phone [REDACTED] researched [REDACTED] e; sent follow up e-mail to [REDACTED]
Brooks, Rachel K	5/9/2022	L100	0.80	272.00	340	[REDACTED]
Hashmall, Joseph	5/9/2022	L100	0.40	318.00	795	Review of complaint [REDACTED], internal emails regarding same [REDACTED] to assist [REDACTED]; and [REDACTED]
Brooks, Rachel K	5/17/2022	L100	0.20	68.00	340	sent follow up e-mail to [REDACTED] Saved received documents in iManage; called [REDACTED] called [REDACTED]; and prepared and sent [REDACTED]
Brooks, Rachel K	5/18/2022	L100	0.40	136.00	340	a [REDACTED] Talked on the phone with Jocelyn Fena re [REDACTED] Sent an e-mail [REDACTED]
Brooks, Rachel K	5/23/2022	L100	0.30	102.00	340	[REDACTED] : Talked on the phone with Jocelyn Fena re [REDACTED] Created [REDACTED]
Brooks, Rachel K	5/23/2022	L100	0.40	136.00	340	[REDACTED] Saved court records [REDACTED]
Brooks, Rachel K	5/24/2022	L100	0.20	68.00	340	[REDACTED]
Hashmall, Joseph	5/24/2022	L100	0.20	159.00	795	Review of case status and deadlines
Hashmall, Joseph	5/24/2022	L120	0.40	318.00	795	Review [REDACTED], internal email regarding filing of case
Brooks, Rachel K	5/26/2022	L100	0.70	238.00	340	Called [REDACTED] saved received documents in iManage; called the [REDACTED] e-mailed [REDACTED] the [REDACTED]; called [REDACTED]; and sent update e-mail [REDACTED]
Hashmall, Joseph	5/31/2022	L200	0.30	238.50	795	Internal emails regarding filing of case
Drake, E.Michelle	6/1/2022	L110	1.10	1,298.00	1180	review [REDACTED]
Hashmall, Joseph	6/1/2022	L120	0.40	318.00	795	Internal emails regarding [REDACTED]
Hashmall, Joseph	6/3/2022	L120	0.10	79.50	795	Litigation team meeting [REDACTED] Saved received court records [REDACTED]; separated and reorganized the records to make them more legible for attorney review; and circulated the records [REDACTED]
Brooks, Rachel K	6/7/2022	L100	0.30	102.00	340	[REDACTED] : E-mailed back and forth with [REDACTED]
Brooks, Rachel K	6/9/2022	L100	0.20	68.00	340	[REDACTED]
Hashmall, Joseph	6/16/2022	L120	0.10	79.50	795	Internal email regarding [REDACTED]

						Completed intake interview [REDACTED]. Edited intake notes; sent follow up e-mail [REDACTED]; saved received documents in iManage; [REDACTED]
Brooks, Rachel K	6/17/2022	L100	1.00	340.00	340	[REDACTED]
Brooks, Rachel K	6/21/2022	L100	0.30	102.00	340	Called [REDACTED]. Saved requested court documents in iManage, and e-mailed back and forth with the [REDACTED].
Brooks, Rachel K	6/22/2022	L100	0.30	102.00	340	[REDACTED]
Hashmall, Joseph	6/22/2022	L100	0.80	636.00	795	Review of intake, [REDACTED]. E-mailed back and forth with Joe Hashmall re [REDACTED]; called [REDACTED]; and [REDACTED]
Brooks, Rachel K	6/23/2022	L100	0.30	102.00	340	added [REDACTED]
Hashmall, Joseph	6/23/2022	L100	0.20	159.00	795	Internal email regarding [REDACTED] review [REDACTED], respond with addiitonal tasks and [REDACTED]
Drake, E.Michelle	6/24/2022	L120	1.60	1,888.00	1180	[REDACTED]
Hashmall, Joseph	6/24/2022	L120	1.00	795.00	795	Drafting memo regarding litigation plan, internal email regarding same
Hashmall, Joseph	6/24/2022	L100	0.40	318.00	795	Call with potential client [REDACTED]
Hibray, Jean	6/24/2022	L140	0.20	100.00	500	Prepare [REDACTED], email J Hashmall
Hashmall, Joseph	6/27/2022	L100	0.60	477.00	795	Review [REDACTED], internal email regarding same, [REDACTED]
Hashmall, Joseph	6/27/2022	L100	0.40	318.00	795	Review of [REDACTED], email to client [REDACTED]
Fena, Jocelyn	6/29/2022	L100	1.00	280.00	280	Email with [REDACTED]
Hibray, Jean	6/29/2022	L140	0.20	100.00	500	DocuSign emails re [REDACTED]
Hashmall, Joseph	6/30/2022	L100	0.50	397.50	795	Call with potential client [REDACTED] follow up email [REDACTED]
Hibray, Jean	6/30/2022	L140	0.20	100.00	500	DocuSign emails [REDACTED]
Albanese, John	7/1/2022	L100	1.50	1,342.50	895	Review client file, call with client [REDACTED] and research [REDACTED]
Drake, E.Michelle	7/1/2022	L210	0.50	590.00	1180	memo to team re [REDACTED], review [REDACTED] being researching [REDACTED]
Drake, E.Michelle	7/1/2022	L210	3.40	4,012.00	1180	[REDACTED]. Researched [REDACTED] saved pertinent records in iManage; and sent follow up e-mail to John Albanese [REDACTED]. Sent [REDACTED]
Brooks, Rachel K	7/5/2022	L100	0.30	102.00	340	[REDACTED]
Brooks, Rachel K	7/5/2022	L100	0.10	34.00	340	[REDACTED]
Hashmall, Joseph	7/5/2022	L100	0.20	159.00	795	Review of [REDACTED]
Hashmall, Joseph	7/5/2022	L100	0.70	556.50	795	Call with potential client [REDACTED] and follow up emails to same [REDACTED] review [REDACTED], compile [REDACTED]
Drake, E.Michelle	7/6/2022	L210	3.20	3,776.00	1180	[REDACTED]

Hashmall, Joseph	7/6/2022	L120	1.60	1,272.00	795	Review of ██████████, internal email regarding ██████████
Albanese, John	7/7/2022	L100	0.10	89.50	895	Discuss case with litigation team
Albanese, John	7/7/2022	L100	1.50	1,342.50	895	Review ██████████ and discuss same with Joe Hashmall and Michelle Drake.
Drake, E.Michelle	7/7/2022	L120	0.10	118.00	1180	team meeting re case status, upcoming deadlines, ██████████
Drake, E.Michelle	7/7/2022	L120	0.80	944.00	1180	call with J Albanese and J Hashmall re ██████████, follow up email re same
Drake, E.Michelle	7/7/2022	L110	2.80	3,304.00	1180	review all ██████████, complete chart showing ██████████
Hashmall, Joseph	7/7/2022	L120	0.70	556.50	795	Call with Michelle Drake and John Albanese ██████████
Drake, E.Michelle	7/8/2022	L110	0.80	944.00	1180	review ██████████, email J. Albanese and J Hashmall re same
Drake, E.Michelle	7/8/2022	L120	0.50	590.00	1180	review ██████████, email J. Hibray re clarifications
Hashmall, Joseph	7/8/2022	L200	0.90	715.50	795	Drafting plan for ██████████ complaint, internal emails regarding same
Brooks, Rachel K	7/11/2022	L210	0.2	68.00	340	Discuss ██████████ with J Hibray
Hashmall, Joseph	7/11/2022	L100	0.20	159.00	795	Review and approval of letter ██████████
Hashmall, Joseph	7/11/2022	L200	0.40	318.00	795	Internal emails regarding draft complaint
Hibray, Jean	7/11/2022	L210	0.20	100.00	500	Send ██████████
Hibray, Jean	7/11/2022	L210	0.30	150.00	500	Email with J Hashmall re ██████████ draft same
Hibray, Jean	7/11/2022	L210	0.20	100.00	500	Discuss ██████████ with R Brooks
Hibray, Jean	7/12/2022	L210	2.70	1,350.00	500	Draft complaint
Hashmall, Joseph	7/13/2022	L200	0.70	556.50	795	Review of and edits to draft complaint, internal email regarding same
Albanese, John	7/14/2022	L100	1.00	895.00	895	Review and comment on complaint.
Albanese, John	7/14/2022	L210	0.2	179.00	895	Discuss complaint with J Hibray
Hashmall, Joseph	7/14/2022	L200	0.90	715.50	795	Review of edits to draft complaint, internal emails regarding further edits to same
Hibray, Jean	7/14/2022	L210	0.50	250.00	500	Edits to complaint, email with team re same
Hibray, Jean	7/14/2022	L210	0.70	350.00	500	Call with J Albanese, research ██████████
Hibray, Jean	7/14/2022	L210	1.00	500.00	500	Review ██████████, organize documents, catalog in chart
Drake, E.Michelle	7/15/2022	L200	0.3	354.00	1180	Meet with J Hashmall re complaint
Hashmall, Joseph	7/15/2022	L200	0.70	556.50	795	Emailing ██████████, email exchanges with clients ██████████
Hashmall, Joseph	7/15/2022	L200	0.30	238.50	795	Call with Michelle Drake regarding draft complaint
Hashmall, Joseph	7/15/2022	L200	0.50	397.50	795	Review of edits to complaint, internal email regarding same
Hibray, Jean	7/15/2022	L210	0.20	100.00	500	Incorporate Hashmall edits, ██████████
Hibray, Jean	7/15/2022	L210	0.30	150.00	500	Finalize clean complaint, ██████████
Albanese, John	7/18/2022	L100	2.00	1,790.00	895	Review and edit complaint ██████████; email team regarding same.
Brooks, Rachel K	7/18/2022	L200	0.1	34.00	340	Discuss ██████████ with J Hashmall
Hashmall, Joseph	7/18/2022	L200	0.30	238.50	795	Call with Rachel Brooks regarding ██████████ internal emails regarding same
Hashmall, Joseph	7/18/2022	L200	0.60	477.00	795	Review of ██████████ internal emails regarding same
Hibray, Jean	7/18/2022	L210	0.30	150.00	500	Calls to named plaintiffs ██████████
Brooks, Rachel K	7/19/2022	L100	0.8	272.00	340	Meet with J Fena re ██████████
Drake, E.Michelle	7/19/2022	L210	1.50	1,770.00	1180	review redline and revise complaint ██████████, approve for filing ██████████
Hashmall, Joseph	7/19/2022	L200	0.80	636.00	795	Internal email exchange regarding ██████████, final pre-filing review of complaint
Hashmall, Joseph	7/19/2022	L200	0.20	159.00	795	Internal email exchange regarding filing draft complaint

Fena, Jocelyn	7/19/2022	L100	0.80	224.00	280	██████████ Call with RKB regarding ██████████
Hibray, Jean	7/19/2022	L210	0.40	200.00	500	Proof, format complaint. Email ██████████
Hibray, Jean	7/19/2022	L210	0.10	50.00	500	Emails to clients ██████████
Hibray, Jean	7/20/2022	L210	0.40	200.00	500	Initiate case on One Legal, finalize filings and upload.
Hibray, Jean	7/20/2022	L210	0.40	200.00	500	Draft Summons, Civil Case Sheet, email attorneys
Hibray, Jean	7/20/2022	L210	0.40	200.00	500	Review San Mateo rules/procedures/forms
Hibray, Jean	7/21/2022	L210	0.20	100.00	500	Review filing acceptance, emails re same
Hashmall, Joseph	7/25/2022	L300	0.40	318.00	795	Review of ██████████, internal email regarding same
Hibray, Jean	7/25/2022	L140	0.70	350.00	500	Draft ██████████ letters, finalize and send with enclosures (5)
Hibray, Jean	7/25/2022	L140	0.80	400.00	500	Draft service/preservation letter; compile service packet, email Metro Legal
Hibray, Jean	7/25/2022	L210	0.40	200.00	500	Review docket, notice of assignment, etc, email with J Davis and J Gionnette re same
Hibray, Jean	7/29/2022	L210	0.20	100.00	500	Review service email, docket removal/response
Albanese, John	8/2/2022	L100	0.10	89.50	895	Meet with litigation team to discuss ██████████
						██████████ Completed intake interview with Melissa ██████████
						██████████ sent follow up e-mail ██████████
						██████████; and researched and saved
Brooks, Rachel K	8/2/2022	L100	0.80	272.00	340	the court records ██████████
Drake, E.Michelle	8/2/2022	L120	0.10	118.00	1180	team meeting to discuss next steps in litigation and upcoming deadlines
Hashmall, Joseph	8/2/2022	L100	0.10	79.50	795	Litigation team meeting
						██████████ Saved received documents and e-mails in iManage; updated ██████████
						██████████ and e-mailed Melissa requesting
Brooks, Rachel K	8/8/2022	L100	0.40	136.00	340	██████████
						██████████ Called to ██████████; added ██████████
						██████████; and sent follow up e-mail to
Brooks, Rachel K	8/12/2022	L100	0.30	102.00	340	Melissa ██████████
Hashmall, Joseph	8/17/2022	L200	1.60	1,272.00	795	Drafting first amended complaint, tinerl emails regarding same
Hashmall, Joseph	8/17/2022	L100	0.40	318.00	795	Call with potential client ██████████ follow up emails regarding same
Hibray, Jean	8/17/2022	L210	0.20	100.00	500	Review rules on amendment, email team re same
Hibray, Jean	8/17/2022	L210	0.20	100.00	500	Review affidavit, email server re issue
Drake, E.Michelle	8/18/2022	L210	0.50	590.00	1180	review redline and revise draft amended complaint
Hashmall, Joseph	8/18/2022	L200	0.50	397.50	795	Email exchange with client ██████████
Hashmall, Joseph	8/18/2022	L200	1.20	954.00	795	Review of Michelle Drake's edits to draft complaint, further edits to same
Hashmall, Joseph	8/19/2022	L200	0.70	556.50	795	Further edits to draft FAC, internal emails regarding same
Hibray, Jean	8/23/2022	L210	0.10	50.00	500	Email with M Ross re ██████████
Hibray, Jean	8/24/2022	L210	0.50	250.00	500	Proof FAC
Hibray, Jean	8/24/2022	L210	0.20	100.00	500	Email with J Davis re FAC.
Hibray, Jean	8/24/2022	L210	0.10	50.00	500	Edit ██████████, email re filing
Hibray, Jean	8/24/2022	L210	0.10	50.00	500	Review ██████████, respond on same
Drake, E.Michelle	8/25/2022	L210	0.50	590.00	1180	review and accept proposed edits to complaint from J Davis and J Hibray
Hibray, Jean	8/25/2022	L210	0.30	150.00	500	Prepare POS for amended complaint, e-file same, along with POS for initial service
Hibray, Jean	8/25/2022	L210	0.40	200.00	500	Finalize, file amended complaint. E-serve W Simmons

Hibray, Jean	8/25/2022	L210	0.10	50.00	500	Prepare [REDACTED]
Hashmall, Joseph	8/29/2022	L120	0.40	318.00	795	Review of emails from [REDACTED]
Hashmall, Joseph	8/30/2022	L120	0.20	159.00	795	Review of status and deadlines in case
Hibray, Jean	9/7/2022	L210	0.10	50.00	500	Email Walker with [REDACTED]
Albanese, John	9/12/2022	L100	0.10	89.50	895	Meet with internal case team regarding [REDACTED]
Hashmall, Joseph	9/12/2022	L120	0.20	159.00	795	Litigation team meeting
Hashmall, Joseph	9/14/2022	L200	0.30	238.50	795	Internal emails regarding PHV motions and attorney appearances
Hibray, Jean	9/14/2022	L210	0.10	50.00	500	Email opposing re date for CMC
Hibray, Jean	9/14/2022	L210	0.30	150.00	500	Email team re next steps on the case, docket deadlines, review judge procedures
Hibray, Jean	9/14/2022	L210	0.30	150.00	500	Review online docket, filed notice, call clerk [REDACTED]
Hibray, Jean	9/14/2022	L140	0.20	100.00	500	Email clients re [REDACTED]
Hibray, Jean	9/14/2022	L140	0.20	100.00	500	Prepare [REDACTED] finalize and send to Ross
Hashmall, Joseph	9/15/2022	L200	0.30	238.50	795	Pre-filing review of PHV motion
Hibray, Jean	9/15/2022	L210	1.00	500.00	500	Draft pro hac applications for J Hashmall and M Drake, review prior cases, review for other Cal pro hacs
Hashmall, Joseph	9/19/2022	L200	0.30	238.50	795	Internal emails and email to opposing counsel regarding extension of time to respond to complain
Hibray, Jean	9/19/2022	L210	0.10	50.00	500	Draft and send email to chambers re: pro hac hearing date
Hibray, Jean	9/19/2022	L210	0.20	100.00	500	Review judicial procedures re hearing date
Hashmall, Joseph	9/20/2022	L200	0.20	159.00	795	Call with opposing counsel regarding case schedule
Hashmall, Joseph	9/20/2022	L200	0.50	397.50	795	Email exchange with opposing counsel regarding case deadline, case management statemen
Hashmall, Joseph	9/21/2022	L200	0.30	238.50	795	Review of draft stipulation regarding CMC, email to opposing counsel regarding same
Hibray, Jean	9/21/2022	L210	0.30	150.00	500	Emails re complex issues, check dockets, rules, calls with main clerk's office, J Gionnette re same.
Hibray, Jean	9/21/2022	L210	0.30	150.00	500	Review court's response to hearing request, review procedures, leave message for chambers
Hibray, Jean	9/22/2022	L210	0.20	100.00	500	Review stip to extend, docket accordingly
Hibray, Jean	9/22/2022	L210	1.00	500.00	500	Update hearing info, finalize pro hac motion papers. State Bar submissions, e-files (2 times), for Hashmall and Drake pro hacs; eserve same, submit mailing request
Hibray, Jean	9/27/2022	L210	0.60	300.00	500	Review online docket, review case management order no. 1, docket accordingly
Hashmall, Joseph	10/5/2022	L200	0.30	238.50	795	Email exchange with opposing counsel regarding requested extensior
Albanese, John	10/6/2022	L100	0.10	89.50	895	Call with internal team regarding [REDACTED]
Hashmall, Joseph	10/6/2022	L100	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	10/6/2022	L200	0.30	238.50	795	Call with opposing counsel regarding case schedule, email to opposing counsel regarding same
Hashmall, Joseph	10/7/2022	L200	0.20	159.00	795	Review of draft stipulation regarding time to respond to complaint, email to opposing counsel regarding same
Hibray, Jean	10/11/2022	L210	0.20	100.00	500	Review new dockets, update calendar accordingly
Hashmall, Joseph	10/19/2022	L300	0.50	397.50	795	Review of initial scheduling order, internal emails regarding draft discovery
Hashmall, Joseph	10/19/2022	L200	0.50	397.50	795	Internal emails regarding case management statement, emails with opposing counsel regarding same
Hibray, Jean	10/19/2022	L210	0.30	150.00	500	Review dockets, emails re: moving CMC date. Draft and send email to court re same
Hashmall, Joseph	10/20/2022	L300	0.30	238.50	795	Internal emails regarding draft case management report

Hibray, Jean	10/20/2022	L210	0.10	50.00	500	Email with court re filing date for statement, update calendar re sam
Hibray, Jean	10/20/2022	L300	0.90	450.00	500	Draft discovery requests
Hibray, Jean	10/20/2022	L210	0.20	100.00	500	Prepare draft joint case management statement
Hashmall, Joseph	10/26/2022	L300	1.00	795.00	795	Review of and edits to draft discovery, internal email regarding same
Albanese, John	11/1/2022	L100	1.00	895.00	895	Review and edit discovery responses.
Hashmall, Joseph	11/1/2022	L300	0.10	79.50	795	Internal email regarding draft discovery
Albanese, John	11/2/2022	L100	0.10	89.50	895	Meet with team regarding [REDACTED]
Hashmall, Joseph	11/2/2022	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	11/2/2022	L300	0.40	318.00	795	Review of [REDACTED], internal email regarding same
Hibray, Jean	11/2/2022	L300	0.20	100.00	500	Edit RFPs, email team re same
Hibray, Jean	11/2/2022	L140	0.10	50.00	500	Re-docket deadlines for S Rios
Hashmall, Joseph	11/4/2022	L300	0.20	159.00	795	Internal email regarding draft discovery requests
Hashmall, Joseph	11/7/2022	L100	0.90	715.50	795	Drafting proposed case management statement, internal emails regarding same
Drake, E.Michelle	11/8/2022	L310	2.70	3,186.00	1180	review redline and revise draft discovery requests--special and form interrogatories, RFPS, case management statement
Drake, E.Michelle	11/8/2022	L100	0.30	354.00	1180	email with oc re next steps
Hashmall, Joseph	11/8/2022	L200	0.50	397.50	795	Internal emails regarding draft case management statement, email to opposing counsel attaching same
Hashmall, Joseph	11/9/2022	L100	0.40	318.00	795	Call with opposing counsel regarding case management plan, potential settlement
Hibray, Jean	11/9/2022	L300	0.40	200.00	500	Review discovery code provisions, email team [REDACTED]
Hashmall, Joseph	11/10/2022	L100	0.50	397.50	795	Review of opposing counsel's edits to draft case management plan, internal emails regarding same
Hashmall, Joseph	11/11/2022	L200	0.30	238.50	795	Review of filed case management report, internal email regarding same
Hashmall, Joseph	11/11/2022	L200	0.50	397.50	795	Review of Defendant's answer, internal emails regarding discovery in light of same
Hibray, Jean	11/11/2022	L210	0.20	100.00	500	Review docket, email attorneys re same
Hashmall, Joseph	11/15/2022	L200	0.20	159.00	795	Internal email regarding logistics for upcoming hearing
Hibray, Jean	11/15/2022	L210	0.20	100.00	500	Review procedures, email court re Zoom information
Hashmall, Joseph	11/17/2022	L300	0.40	318.00	795	Internal email regarding [REDACTED]
Hashmall, Joseph	11/17/2022	L300	0.30	238.50	795	Call with opposing counsel regarding data sampling proposal
Drake, E.Michelle	11/18/2022	L230	0.80	944.00	1180	appear at CMC
Drake, E.Michelle	11/21/2022	L100	0.30	354.00	1180	email with J Hashmall and J Albanese re [REDACTED]
Hashmall, Joseph	11/21/2022	L100	0.20	159.00	795	Review of and edits to [REDACTED]
Hashmall, Joseph	11/21/2022	L120	0.30	238.50	795	Internal emails regarding [REDACTED]
Hibray, Jean	11/21/2022	L140	0.10	50.00	500	Draft update letter
Hashmall, Joseph	11/22/2022	L100	0.30	238.50	795	Internal emails and email to opposing counsel setting up call on settlement
Hibray, Jean	11/22/2022	L140	0.20	100.00	500	Prepare and send update letters
Hibray, Jean	11/29/2022	L210	0.10	50.00	500	Check dockets
Drake, E.Michelle	11/30/2022	L160	0.60	708.00	1180	call with oc re settlement negotiations
Drake, E.Michelle	11/30/2022	L160	1.20	1,416.00	1180	draft [REDACTED]
Hashmall, Joseph	11/30/2022	L160	0.80	636.00	795	Drafting letter to opposing counsel regarding pre-mediation discovery
Hashmall, Joseph	11/30/2022	L160	0.60	477.00	795	Call with opposing counsel regarding pre-mediation informal discovery
Drake, E.Michelle	12/1/2022	L160	1.30	1,534.00	1180	review redline and revise letter to oc re [REDACTED]
Hashmall, Joseph	12/1/2022	L300	0.50	397.50	795	Internal emails regarding draft discovery letter, email to opposing counsel attaching same

Hashmall, Joseph	12/9/2022	L300	0.20	159.00	795	Internal email regarding [REDACTED]
Albanese, John	12/12/2022	L100	0.10	89.50	895	Meet with team regarding [REDACTED]
Hashmall, Joseph	12/12/2022	L160	0.20	159.00	795	Email to opposing counsel regarding pre-mediation discovery
Hashmall, Joseph	12/12/2022	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	12/13/2022	L300	0.40	318.00	795	Internal emails and email with opposing counsel regarding pre-mediation data sample production
Hashmall, Joseph	12/13/2022	L300	0.30	238.50	795	Call with opposing counsel regarding pre-mediation data sample production
Hashmall, Joseph	12/20/2022	L300	0.20	159.00	795	Email exchange with opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	12/28/2022	L300	0.30	238.50	795	Email exchange with opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	1/4/2023	L300	0.20	159.00	795	Email to opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	1/5/2023	L200	0.50	397.50	795	Review of draft protective order, internal email regarding same
Hibray, Jean	1/5/2023	L160	0.10	50.00	500	Review and respond to [REDACTED]
Albanese, John	1/6/2023	L100	0.10	89.50	895	Discuss case status with litigation team
Drake, E.Michelle	1/6/2023	L120	0.10	118.00	1180	team meeting to review upcoming deadlines and next steps in litigation
Hashmall, Joseph	1/6/2023	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	1/6/2023	L200	0.40	318.00	795	Review of draft protective order, email to opposing counsel regarding same, follow up email to opposing counsel regarding disclosures
Hibray, Jean	1/6/2023	L210	0.20	100.00	500	Review tentatives, email attorneys
Hashmall, Joseph	1/9/2023	L300	0.20	159.00	795	Email exchange with opposing counsel regarding call on pre-mediation discovery
Hashmall, Joseph	1/9/2023	L200	0.40	318.00	795	Review of tentative order regarding pro hoc motions, internal email regarding hearing on same
Hibray, Jean	1/9/2023	L210	0.20	100.00	500	Check tentative rules, email J Hashmall re same
Hashmall, Joseph	1/11/2023	L120	0.30	238.50	795	Emails with opposing counsel regarding time to discuss case management statement
Drake, E.Michelle	1/12/2023	L120	0.50	590.00	1180	check in call with J Hashmall
Hashmall, Joseph	1/12/2023	L200	0.30	238.50	795	Email to opposing counsel regarding status report, mediator selector
Hashmall, Joseph	1/12/2023	L200	0.50	397.50	795	Call with opposing counsel regarding status report, pre-mediation disclosures
Hashmall, Joseph	1/12/2023	L120	0.5	397.50	795	Meet with M Drake re status
Hashmall, Joseph	1/13/2023	L200	0.50	397.50	795	Review of draft status report, internal emails and email to opposing counsel regarding same
Hashmall, Joseph	1/13/2023	L200	0.20	159.00	795	Email exchange with opposing counsel regarding status report
Hibray, Jean	1/13/2023	L210	0.30	150.00	500	Proof, finalize and submit joint case management statement.
Hashmall, Joseph	1/16/2023	L200	0.30	238.50	795	Review of Defendant's edits to protective order, email to opposing counsel regarding same
Hashmall, Joseph	1/20/2023	L200	0.40	318.00	795	Attend case management conference
Hashmall, Joseph	1/20/2023	L120	0.80	636.00	795	Review of file in advance of case management conference
Hashmall, Joseph	1/20/2023	L120	0.30	238.50	795	Internal email regarding upcoming CMC, email to opposing counsel regarding same
Hashmall, Joseph	1/23/2023	L200	0.30	238.50	795	Internal emails regarding case management report
Hibray, Jean	1/23/2023	L210	0.10	50.00	500	Prepare first draft of CMO 2
Hibray, Jean	1/23/2023	L210	0.60	300.00	500	Emails with J Hashmall re CMO draft, research examples on Westlaw, court sites
Hashmall, Joseph	1/24/2023	L300	0.30	238.50	795	Downloading Defendant's pre-mediation production, internal email and email to opposing counsel regarding same
Hashmall, Joseph	1/24/2023	L200	0.30	238.50	795	Internal emails and emails to cocounsel regarding case status report
Albanese, John	1/25/2023	L100	0.50	447.50	895	Review documents produced and email team regarding same.
Hashmall, Joseph	1/25/2023	L300	1.00	795.00	795	Review of Defendant's production, internal emails about same, email to opposing counsel following up on same
Hashmall, Joseph	1/25/2023	L200	0.60	477.00	795	Edits to draft case management order, internal email regarding same

Hashmall, Joseph	2/1/2023	L200	0.50	397.50	795	Email to opposing counsel regarding case management order, internal emails regarding filing of same
Hibray, Jean	2/1/2023	L210	0.30	150.00	500	Finalize prop order submission, e-submit, email Word version to Chambers.
Hibray, Jean	2/1/2023	L210	0.30	150.00	500	Review procedure on proposed orders, prepare cover sheet, email J Hashmal
Hashmall, Joseph	2/2/2023	L200	0.10	79.50	795	Internal email regarding filing of case management order
Hibray, Jean	2/2/2023	L210	0.30	150.00	500	Review clerk's QC notice, edit and resubmit prop order filing.
Hibray, Jean	2/7/2023	L210	0.20	100.00	500	Review CMO 2, docket accordingly
Hashmall, Joseph	2/8/2023	L300	0.20	159.00	795	Email to opposing counsel regarding pre-mediaton disclosures
Hashmall, Joseph	2/9/2023	L120	0.20	159.00	795	Internal email regarding pre-mediation disclosures
Hashmall, Joseph	2/9/2023	L120	0.30	238.50	795	Email exchange with client
Hashmall, Joseph	2/13/2023	L300	0.20	159.00	795	Internal email regarding [REDACTED]
Hashmall, Joseph	2/21/2023	L300	0.30	238.50	795	Email to opposing counsel regarding data production
Hashmall, Joseph	2/23/2023	L300	0.30	238.50	795	Review of voicemail from opposing counsel regarding case status, responsive email to same
Hashmall, Joseph	2/27/2023	L200	0.60	477.00	795	Internal emails regarding extension of time, emails with opposing counsel regarding same
Hashmall, Joseph	2/27/2023	L160	0.70	556.50	795	Internal emails regarding mediator selection, email to opposing counsel regarding same
Hashmall, Joseph	2/28/2023	L100	0.20	159.00	795	Review of filed case managment statement, internal email regarding same
Hibray, Jean	3/2/2023	L210	0.20	100.00	500	Review new filing, docket same
Hashmall, Joseph	3/3/2023	L160	0.20	159.00	795	Internal email regarding mediator selection
Hashmall, Joseph	3/3/2023	L300	0.20	159.00	795	Email to opposing counsel regarding pre-mediation disclosures
Drake, E.Michelle	3/7/2023	L160	0.60	708.00	1180	emails with J Hashmall re [REDACTED]
Hashmall, Joseph	3/7/2023	L160	0.30	238.50	795	Internal email regarding mediator selection
Hashmall, Joseph	3/7/2023	L300	1.60	1,272.00	795	Review of Defendant's limited pre-mediation disclosures, internal email regarding response to same, email to opposing counsel regarding same
Drake, E.Michelle	3/8/2023	L160	0.70	826.00	1180	email with J hashmall re [REDACTED]
Hashmall, Joseph	3/8/2023	L300	0.80	636.00	795	Internal emails and email to opposing counsel regarding mediator selector
Hashmall, Joseph	3/8/2023	L300	0.20	159.00	795	Review of pre-mediation production from opposing counsel, internal email regarding same
Hashmall, Joseph	3/10/2023	L200	0.40	318.00	795	Review of draft status report, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	3/10/2023	L200	0.20	159.00	795	Email exchange with opposing counsel regarding status update to cour
Hibray, Jean	3/10/2023	L210	0.50	250.00	500	Draft updated case mgmt statement, finalize and e-file
Hashmall, Joseph	3/13/2023	L160	0.20	159.00	795	Email exchange with opposing counsel regarding update to court, mediator
Drake, E.Michelle	3/15/2023	L110	1.00	1,180.00	1180	review initial data sample from defendant; send [REDACTED] J Hashmall and J Albanese
Hashmall, Joseph	3/15/2023	L300	1.20	954.00	795	Downloading Defendant's pre-mediation document production, reviewing same, internal emails and emails to opposing counsel regarding same
Albanese, John	3/16/2023	L100	1.50	1,342.50	895	Review spreadsheet produced by Defendant and email team regarding same
Hashmall, Joseph	3/17/2023	L120	0.10	79.50	795	Internal email regarding [REDACTED]
Hashmall, Joseph	3/20/2023	L100	0.10	79.50	795	Review of [REDACTED] to client
Hibray, Jean	3/20/2023	L140	0.40	200.00	500	Draft update [REDACTED] prepare and send to [REDACTED]
Hashmall, Joseph	3/21/2023	L120	0.10	79.50	795	Email with Michelle Drake regarding next steps in case
Hashmall, Joseph	3/21/2023	L160	0.30	238.50	795	Email to opposing counsel regarding next steps in pre-mediaton disclosures
Hashmall, Joseph	3/22/2023	L300	0.30	238.50	795	Email to opposing counsel regarding additional pre-mediation disclosures
Hashmall, Joseph	3/22/2023	L300	0.60	477.00	795	Review of Defendant's pre-mediation disclosure, internal email regarding same

Hibray, Jean	3/22/2023	L300	0.90	450.00	500	Review [REDACTED]. Review [REDACTED].
Hashmall, Joseph	3/24/2023	L300	0.60	477.00	795	[REDACTED]. Research [REDACTED]. Email team.
Hashmall, Joseph	3/28/2023	L160	0.30	238.50	795	Review of [REDACTED], internal email regarding same
Hashmall, Joseph	3/31/2023	L160	0.20	159.00	795	Email exchange with opposing counsel regarding pre-mediation disclosures
Albanese, John	4/3/2023	L100	0.10	89.50	895	Email exchange with opposing counsel regarding mediator selector
Hashmall, Joseph	4/3/2023	L120	0.20	159.00	795	Discuss [REDACTED] with in house litigation team
Hibray, Jean	4/6/2023	L160	0.30	150.00	500	Litigation team meeting
Hashmall, Joseph	4/7/2023	L300	0.80	636.00	795	Email M McClain for protective order, send DocuSign re same
Hibray, Jean	4/7/2023	L160	0.90	450.00	500	Review of Defendant's data production, internal emails regarding same
Hibray, Jean	4/7/2023	L160	0.80	400.00	500	Set up [REDACTED]. Draft and send [REDACTED] to McClair
McClain, Michael	4/8/2023	L300	2.50	875.00	350	Review [REDACTED] discussions re [REDACTED] project.
Hashmall, Joseph	4/10/2023	L160	0.30	238.50	795	Email to opposing counsel regarding mediation and pre-mediation disclosures
Hibray, Jean	4/10/2023	L160	0.30	150.00	500	Review McClain's notes [REDACTED], confirm receipt of same.
Hashmall, Joseph	4/11/2023	L300	0.50	397.50	795	Review of [REDACTED] data, internal emails regarding same
Hashmall, Joseph	4/20/2023	L160	0.60	477.00	795	Internal emails regarding mediation dates, next steps in case, email to opposing counsel regarding same
Hashmall, Joseph	4/28/2023	L160	0.30	238.50	795	Email exchange with opposing counsel regarding mediation scheduling, pre-mediaton disclosures
Hibray, Jean	4/28/2023	L160	0.10	50.00	500	Docket mediation
Hibray, Jean	5/3/2023	L210	0.20	100.00	500	Review mediation confirmation, docket triggered events
Hashmall, Joseph	5/9/2023	L160	0.20	159.00	795	Email exchange with opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	5/12/2023	L160	0.10	79.50	795	Email to opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	5/15/2023	L160	0.40	318.00	795	Internal emails regarding call with cocounsel regarding pre-mediation disclosures
Hashmall, Joseph	5/15/2023	L160	0.40	318.00	795	Call and email with opposing counsel regarding pre-mediation disclosures
Albanese, John	5/16/2023	L100	0.10	89.50	895	discuss [REDACTED] with litigaiton team.
Drake, E.Michelle	5/16/2023	L120	0.10	118.00	1180	team meeting re schedule and next steps
Hashmall, Joseph	5/16/2023	L300	0.30	238.50	795	Email to opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	5/16/2023	L120	0.20	159.00	795	Litigation team meeting
Hashmall, Joseph	5/22/2023	L160	0.90	715.50	795	Review of new pre-mediation disclosures, internal email and email to opposing counsel regarding same
Hashmall, Joseph	6/5/2023	L300	0.20	159.00	795	Email to opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	6/9/2023	L300	0.30	238.50	795	Email with opposing counsel regarding pre-mediation disclosures
Drake, E.Michelle	6/12/2023	L160	0.50	590.00	1180	call with mediator Lou Peterson
Hashmall, Joseph	6/12/2023	L160	0.50	397.50	795	Pre-mediation call with mediator and opposing counsel
Hashmall, Joseph	6/12/2023	L300	0.40	318.00	795	Call with opposing counsel regarding pre-mediaton disclosures, mediation schedule. Internal emails regarding same
Hibray, Jean	6/12/2023	L160	0.10	50.00	500	Complete mediation agreement, email same
Hashmall, Joseph	6/14/2023	L160	0.30	238.50	795	Review of case status, email to opposing counsel regarding mediator
Hashmall, Joseph	6/15/2023	L160	0.30	238.50	795	Review of email regarding rescheduled mediation, internal emails regarding same
Hashmall, Joseph	6/16/2023	L160	0.30	238.50	795	Review of emails with mediators office regarding schedule, internal emails regarding same
Hashmall, Joseph	6/21/2023	L160	0.30	238.50	795	Email exchange with opposing counsel regarding data production pre-mediator

Albanese, John	6/26/2023	L100	0.10	89.50	895	Discuss ██████ with case team.
Drake, E.Michelle	6/26/2023	L120	0.10	118.00	1180	team meeting to touch base on case status
Hashmall, Joseph	6/26/2023	L160	0.10	79.50	795	Email to opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	6/26/2023	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	6/28/2023	L200	0.30	238.50	795	Review of case schedule, internal email regarding case management statement
Hashmall, Joseph	6/28/2023	L160	0.30	238.50	795	Email with opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	6/28/2023	L120	0.30	238.50	795	Internal emails regarding ██████
Hibray, Jean	6/28/2023	L210	0.30	150.00	500	Prepare updated case mgmt statement
Hashmall, Joseph	6/29/2023	L120	0.10	79.50	795	Internal email regarding ██████
Hashmall, Joseph	6/29/2023	L200	0.50	397.50	795	Review of draft case management statement, internal emails and emails with opposing counsel regarding same
Hibray, Jean	6/29/2023	L210	0.10	50.00	500	File updated case mgmt statement
Hibray, Jean	6/29/2023	L140	0.10	50.00	500	Draft ██████
Hashmall, Joseph	6/30/2023	L100	0.70	556.50	795	Review of documents and facts ██████, internal emails regarding same
Hibray, Jean	7/5/2023	L140	0.50	250.00	500	Prepare and send ██████
Hashmall, Joseph	7/6/2023	L120	0.30	238.50	795	Internal emails, emails with mediator regarding mediation submission deadline
Hashmall, Joseph	7/6/2023	L120	0.20	159.00	795	Email with opposing counsel regarding class data
Hibray, Jean	7/6/2023	L160	0.20	100.00	500	Emails re mediation statement due date, docket accordingly
Hibray, Jean	7/6/2023	L300	0.10	50.00	500	Respond to ██████
Hashmall, Joseph	7/10/2023	L100	1.10	874.50	795	Call with potential additional ██████, follow up emails regarding same
Hashmall, Joseph	7/11/2023	L120	0.30	238.50	795	Email to potential client ██████
Hashmall, Joseph	7/14/2023	L300	0.30	238.50	795	Email with opposing counsel regarding pre-mediation disclosures
Hashmall, Joseph	7/18/2023	L300	0.40	318.00	795	Review of email and voicemail from opposing counsel regarding data production, email in response to same
Hashmall, Joseph	7/19/2023	L120	0.10	79.50	795	Internal review of case status and deadlines
Hashmall, Joseph	7/19/2023	L120	0.50	397.50	795	Review of documents of ██████, internal emails regarding same
Hashmall, Joseph	7/20/2023	L100	0.30	238.50	795	Internal email regarding ██████
Drake, E.Michelle	7/24/2023	L160	1.80	2,124.00	1180	initial review of data produced by Defenant, email J Hashmall ██████
Hashmall, Joseph	7/24/2023	L300	0.30	238.50	795	Email exchange with opposing counsel regarding data production
Hashmall, Joseph	7/25/2023	L300	0.50	397.50	795	Internal emails regarding ██████
Hibray, Jean	7/25/2023	L160	0.10	50.00	500	Email with J Hashmall re ██████
Hashmall, Joseph	7/26/2023	L300	0.30	238.50	795	Internal emails regarding ██████
Albanese, John	7/27/2023	L190	0.60	537.00	895	Review ██████ and email Joe Hoashmall
Hashmall, Joseph	7/27/2023	L160	0.50	397.50	795	Internal emails regarding ██████
Hashmall, Joseph	7/27/2023	L160	2.80	2,226.00	795	Review of Defendant's pre-mediation data disclosures, internal emails regarding ██████
Hibray, Jean	7/27/2023	L160	0.10	50.00	500	Pull ██████ and circulate
Hibray, Jean	7/27/2023	L160	0.30	150.00	500	Run ██████ for J Hashmall
Hibray, Jean	7/27/2023	L160	0.60	300.00	500	Review ██████, check ██████
Hashmall, Joseph	7/28/2023	L120	0.20	159.00	795	Review of case status
Hashmall, Joseph	7/28/2023	L160	0.60	477.00	795	Further review of ██████, internal emails regarding same

Hashmall, Joseph	7/31/2023	L160	1.20	954.00	795	Review of data [REDACTED], internal emails regarding same
Hashmall, Joseph	7/31/2023	L160	0.30	238.50	795	Call with Michelle Drake regarding [REDACTED]
Hibray, Jean	7/31/2023	L160	0.50	250.00	500	Review [REDACTED] attorney review
Hashmall, Joseph	8/2/2023	L160	0.20	159.00	795	Internal email regarding [REDACTED]
Hashmall, Joseph	8/3/2023	L160	0.10	79.50	795	Internal email regarding [REDACTED]
Drake, E.Michelle	8/7/2023	L120	0.10	118.00	1180	team meeting re case status and [REDACTED]
Hashmall, Joseph	8/7/2023	L100	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	8/7/2023	L160	0.10	79.50	795	Internal email regarding [REDACTED]
Hashmall, Joseph	8/8/2023	L120	0.80	636.00	795	Emails with court clerk regarding case schedule, call and emails with opposing counsel regarding same
Hashmall, Joseph	8/8/2023	L120	0.30	238.50	795	Review of draft email to court regarding case schedule, internal email regarding same
Hibray, Jean	8/8/2023	L210	0.30	150.00	500	Review Swope procedures, scheduling informaiton; draft email request for continuance, send same
Drake, E.Michelle	8/9/2023	L160	0.2	236.00	1180	Call with J Hashmall re [REDACTED]
Hashmall, Joseph	8/9/2023	L160	0.50	397.50	795	Call with Michelle Drake regarding [REDACTED] follow up emails regarding same
Hibray, Jean	8/9/2023	L160	1.00	500.00	500	Emails re data review. Review [REDACTED], document findings
Hashmall, Joseph	8/10/2023	L160	3.30	2,623.50	795	Drafting mediation statement, internal emails regarding same
Hashmall, Joseph	8/10/2023	L120	2.90	2,305.50	795	Review of [REDACTED], internal emails regarding same
Hibray, Jean	8/10/2023	L160	1.50	750.00	500	Review [REDACTED], email re findings
Hibray, Jean	8/10/2023	L160	0.10	50.00	500	Email re [REDACTED]
Drake, E.Michelle	8/11/2023	L160	1.30	1,534.00	1180	review redline and revise demand letter
Hashmall, Joseph	8/11/2023	L160	1.40	1,113.00	795	Edits to draft mediation statement, internal emails regarding same
Hashmall, Joseph	8/11/2023	L160	0.30	238.50	795	Internal emails regarding settlement demand
Drake, E.Michelle	8/14/2023	L160	1.30	1,534.00	1180	review redline and revise mediation statement, including [REDACTED]
Hashmall, Joseph	8/14/2023	L160	2.50	1,987.50	795	Calls and emails to clients [REDACTED]
Hashmall, Joseph	8/14/2023	L160	2.20	1,749.00	795	Internal emails and emails to opposing counsel regarding mediation statement; edits to mediation statement
Hibray, Jean	8/14/2023	L160	0.70	350.00	500	Proof, finalize mediation statement, compile exhibits; e-serve
Hibray, Jean	8/14/2023	L160	0.10	50.00	500	Gather [REDACTED] for J Hashmall
Hibray, Jean	8/14/2023	L160	0.20	100.00	500	Prepare mediation exhibits of data excerpts for attorney review
Drake, E.Michelle	8/17/2023	L160	8.00	9,440.00	1180	attend mediation; follow up with J Hashmall afterwards
Hashmall, Joseph	8/17/2023	L160	1.50	1,192.50	795	Call clients [REDACTED]
Hashmall, Joseph	8/17/2023	L160	6.50	5,167.50	795	Attend mediation
Hashmall, Joseph	8/18/2023	L160	0.90	715.50	795	Emails to clients [REDACTED]
Hashmall, Joseph	8/18/2023	L300	0.80	636.00	795	Drafting discovery letter to opposing counsel, internal emails regarding same
Hashmall, Joseph	8/18/2023	L160	0.30	238.50	795	Internal emails regarding [REDACTED]
Hibray, Jean	8/22/2023	L160	0.10	50.00	500	Check docket status
Hashmall, Joseph	8/28/2023	L160	0.10	79.50	795	Emails to opposing counsel regarding settlement talks
Hashmall, Joseph	8/28/2023	L160	0.30	238.50	795	Emails to client regarding [REDACTED]
Hashmall, Joseph	8/29/2023	L160	0.50	397.50	795	Call with opposing counsel regarding mediation, internal email regarding same
Albanese, John	8/31/2023	L100	0.10	89.50	895	Discuss case with case team.
Drake, E.Michelle	8/31/2023	L120	0.10	118.00	1180	meet with team re next steps

Hashmall, Joseph	8/31/2023	L120	0.20	159.00	795	Litigation team meeting
Drake, E.Michelle	9/1/2023	L310	0.90	1,062.00	1180	correspondence with J hashmall re [REDACTED]
Hashmall, Joseph	9/1/2023	L300	4.80	3,816.00	795	Review of [REDACTED], internal emails regarding same
Hashmall, Joseph	9/4/2023	L160	0.20	159.00	795	Email to Michelle Drake regarding [REDACTED]
Drake, E.Michelle	9/5/2023	L110	0.50	590.00	1180	correspondence with J hashmall re [REDACTED]
Hashmall, Joseph	9/5/2023	L300	1.20	954.00	795	[REDACTED] research
Hashmall, Joseph	9/8/2023	L160	0.20	159.00	795	Emails to opposing counsel regarding time to discuss case
Hashmall, Joseph	9/11/2023	L120	0.20	159.00	795	Internal email regarding status update to Court
Hashmall, Joseph	9/11/2023	L160	0.10	79.50	795	Email to opposing counsel regarding time to discuss settlement
Hibray, Jean	9/11/2023	L210	0.20	100.00	500	Review docket, email J Hashmall re status report due
Drake, E.Michelle	9/12/2023	L160	0.80	944.00	1180	call with oc re settlement status
Hashmall, Joseph	9/12/2023	L160	1.20	954.00	795	Drafting settlement letter to opposing counsel regarding [REDACTED], internal emails regarding same
Hashmall, Joseph	9/12/2023	L200	0.50	397.50	795	Review of draft status update to Court, internal emails regarding same
Hashmall, Joseph	9/12/2023	L160	0.80	636.00	795	Call with opposing counsel regarding continued settlement talks
Hibray, Jean	9/12/2023	L210	0.20	100.00	500	Draft updated case mgmt statement
Drake, E.Michelle	9/13/2023	L160	0.70	826.00	1180	review redline and revise letter to oc re settlement status
Hashmall, Joseph	9/13/2023	L160	0.40	318.00	795	Review of Michelle Drake's edits to settlement letter, further edits to same, internal emails and email to opposing counsel regarding same
Hashmall, Joseph	9/13/2023	L200	0.30	238.50	795	Internal emails and emails to opposing counsel regarding draft status report to court
Hibray, Jean	9/13/2023	L210	0.30	150.00	500	Finalize and file updated case mgmt statement
Hibray, Jean	9/14/2023	L210	0.20	100.00	500	Review clerk email, update calendar
Hashmall, Joseph	9/15/2023	L120	0.20	159.00	795	Emails with client [REDACTED]
Hashmall, Joseph	9/20/2023	L160	0.40	318.00	795	Review [REDACTED], email to opposing counsel regarding same
Hashmall, Joseph	9/25/2023	L160	0.20	159.00	795	Email exchange with opposing counsel regarding status of settlement talks
Hashmall, Joseph	9/29/2023	L160	0.50	397.50	795	Email exchange with opposing counsel regarding settlement talks
Hashmall, Joseph	9/29/2023	L100	0.20	159.00	795	Review of mediation invoice, internal email regarding same
Marsnik, Ivy	10/4/2023	L160	0.20	126.00	630	Email to opposing counsel regarding status of settlement talks
Albanese, John	10/5/2023	L100	0.10	89.50	895	Meet with team to discuss case status
Drake, E.Michelle	10/5/2023	L120	0.10	118.00	1180	team meeting to discuss case status
Hashmall, Joseph	10/5/2023	L120	0.10	79.50	795	Litigation team meeting
Hibray, Jean	10/5/2023	L210	0.20	100.00	500	Review new docket, update calendar accordingly.
Hashmall, Joseph	10/12/2023	L160	0.30	238.50	795	Exchange of emails and voicemails with opposing counsel regarding settlement talks
Hashmall, Joseph	10/18/2023	L160	0.20	159.00	795	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	10/19/2023	L120	0.30	238.50	795	Email exchange with client regarding case status
Hashmall, Joseph	10/24/2023	L160	0.20	159.00	795	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	10/24/2023	L120	0.20	159.00	795	Update email to client [REDACTED]
Drake, E.Michelle	10/30/2023	L160	0.20	236.00	1180	call with J Hashmall re case status
Hashmall, Joseph	10/30/2023	L160	0.50	397.50	795	Email to opposing counsel regarding settlement, call with Michelle Drake regarding same
Hashmall, Joseph	11/6/2023	L160	0.20	159.00	795	Internal emails regarding invoice for mediation
Hashmall, Joseph	11/6/2023	L160	0.30	238.50	795	Email exchange with opposing counsel regarding settlement
Drake, E.Michelle	11/7/2023	L160	0.80	944.00	1180	call re settlement status

Hashmall, Joseph	11/7/2023	L160	0.40	318.00	795	Emails and call with Michelle Drake regarding [REDACTED]
Hashmall, Joseph	11/7/2023	L160	0.60	477.00	795	Call with opposing counsel regarding settlement
Hashmall, Joseph	11/8/2023	L160	0.20	159.00	795	Email to opposing counsel following up on settlement call
Albanese, John	11/9/2023	L100	0.10	89.50	895	discuss [REDACTED] with internal team.
Drake, E.Michelle	11/9/2023	L120	0.10	118.00	1180	call with team to discuss deadlines and next steps
Hashmall, Joseph	11/9/2023	L120	0.10	79.50	795	Litigation team call
Hashmall, Joseph	11/10/2023	L120	0.30	238.50	795	Case update email to client [REDACTED]
Hashmall, Joseph	11/13/2023	L160	0.20	159.00	795	Email to opposing counsel regarding time to discuss settlement
Hashmall, Joseph	11/15/2023	L160	0.20	159.00	795	Review of email from opposing counsel regarding settlement, internal email regarding same
Hashmall, Joseph	11/17/2023	L120	0.20	159.00	795	Review of draft [REDACTED] to client, [REDACTED]
Hibray, Jean	11/21/2023	L140	0.30	150.00	500	Prepare and send [REDACTED] to clients
Hashmall, Joseph	11/22/2023	L120	0.20	159.00	795	Internal emails regarding net steps in settlement talks
Hashmall, Joseph	11/27/2023	L160	0.30	238.50	795	Email to opposing counsel regarding settlement status, internal email regarding same
Hashmall, Joseph	12/1/2023	L160	0.30	238.50	795	Internal emails and emails to opposing counsel regarding further settlement talks
Hashmall, Joseph	12/5/2023	L120	0.30	238.50	795	Email exchange with Michelle Drake regarding [REDACTED]
Albanese, John	12/14/2023	L100	0.10	89.50	895	Discuss case status and strategy with internal team.
Drake, E.Michelle	12/14/2023	L120	0.10	118.00	1180	meet with team re next steps
Hashmall, Joseph	12/14/2023	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	12/26/2023	L120	0.50	397.50	795	Internal emails regarding [REDACTED]
Hibray, Jean	12/26/2023	L210	0.10	50.00	500	Emails re upcoming case management statement
Hashmall, Joseph	12/27/2023	L200	1.20	954.00	795	Drafting proposed case management statement, internal emails and email to opposing counsel regarding same
Drake, E.Michelle	12/28/2023	L160	0.50	590.00	1180	call with Rod Fliegel
Hashmall, Joseph	12/28/2023	L200	2.20	1,749.00	795	Revisions to various versions of status report, internal emails and emails with opposing counsel regarding same
Hashmall, Joseph	12/28/2023	L120	0.30	238.50	795	Call with Michelle Drake regarding draft status report
Hashmall, Joseph	12/29/2023	L120	2.80	2,226.00	795	Review of case production materials [REDACTED] legal research regarding same, internal emails regarding same
Hashmall, Joseph	1/3/2024	L200	0.10	79.50	795	Internal email regarding pro hoc renewals
Hibray, Jean	1/3/2024	L210	0.10	50.00	500	Review remote attendance info, docket for CMC
Hibray, Jean	1/4/2024	L210	0.50	250.00	500	Prepare notices of pro hac renewals, finalize and file same
Hashmall, Joseph	1/5/2024	L200	0.60	477.00	795	Attend status conference
Hashmall, Joseph	1/8/2024	L200	0.40	318.00	795	Review of draft case management order, email to opposing counsel regarding same
Hibray, Jean	1/8/2024	L210	0.50	250.00	500	Prepare proposed Case Mgmt Order, prepare cover sheet. Submit to court and email copy
Hashmall, Joseph	1/9/2024	L160	0.40	318.00	795	Review of [REDACTED], internal emails regarding response to same
Drake, E.Michelle	1/10/2024	L160	0.50	590.00	1180	call with R Fliegel re settlement
Hashmall, Joseph	1/10/2024	L160	0.30	238.50	795	Internal emails in advance of and after settlement call with opposing counsel
Hashmall, Joseph	1/10/2024	L160	0.70	556.50	795	Updating [REDACTED] internal email regarding same
Hashmall, Joseph	1/11/2024	L160	0.20	159.00	795	Email to opposing counsel regarding potential settlement structure
Hashmall, Joseph	1/11/2024	L160	1.20	954.00	795	Calls and emails to clients [REDACTED], internal emails regarding same
Hibray, Jean	1/11/2024	L160	0.10	50.00	500	Email [REDACTED] attorney

Hashmall, Joseph	1/12/2024	L120	0.20	159.00	795	Status update to client ██████████
Hashmall, Joseph	1/12/2024	L160	0.10	79.50	795	Email to opposing counsel regarding settlement structure
Hashmall, Joseph	1/12/2024	L160	1.50	1,192.50	795	Calls with clients ██████████, internal emails regarding same
Hashmall, Joseph	1/16/2024	L160	0.40	318.00	795	Internal emails and email to opposing counsel regarding settlement
Hashmall, Joseph	1/18/2024	L120	0.30	238.50	795	Cal with client ██████████, internal email regarding same
Hashmall, Joseph	1/18/2024	L160	0.30	238.50	795	Review of voicemail from opposing counsel regarding settlement, internal emails regarding same
Hashmall, Joseph	1/22/2024	L120	0.30	238.50	795	Internal emails regarding ██████████
Hibray, Jean	1/22/2024	L210	0.20	100.00	500	Review new case mgmt order, docket events
Drake, E.Michelle	1/23/2024	L160	0.60	708.00	1180	correspondence with J Hashmall re ██████████
Drake, E.Michelle	1/23/2024	L160	0.30	354.00	1180	follow up call with R. Fliegel re settlement
Drake, E.Michelle	1/23/2024	L160	0.60	708.00	1180	call with R. Fliegel re settlement
Hashmall, Joseph	1/23/2024	L160	0.80	636.00	795	Internal emails regarding ██████████
Hashmall, Joseph	1/24/2024	L200	1.80	1,431.00	795	Drafting second amended complaint
Hashmall, Joseph	1/24/2024	L120	0.20	159.00	795	Internal email regarding setting hearing date for preliminary approval
Hibray, Jean	1/24/2024	L210	0.40	200.00	500	Review hearing rules, call and leave message for court, email with J Hashmall re same
Hashmall, Joseph	1/26/2024	L120	0.20	159.00	795	Internal email regarding scheduling of preliminary approval hearing
Hibray, Jean	1/26/2024	L160	0.10	50.00	500	Outreach to chambers, leave VM
Hashmall, Joseph	1/29/2024	L120	0.30	238.50	795	Internal emails regarding settlement status
Albanese, John	1/30/2024	L100	0.10	89.50	895	Meet with case team regarding ██████████
Drake, E.Michelle	1/30/2024	L120	0.10	118.00	1180	team call to touch base on next steps in litigation
Hashmall, Joseph	1/30/2024	L160	0.10	79.50	795	Internal emails regarding ██████████
Hashmall, Joseph	1/30/2024	L100	0.10	79.50	795	Litigation team meeting
Drake, E.Michelle	1/31/2024	L160	1.60	1,888.00	1180	review redline and revise term sheet, send to J Hashmall
Hashmall, Joseph	1/31/2024	L160	0.80	636.00	795	Review of draft terms sheet, internal emails regarding ██████████
Drake, E.Michelle	2/6/2024	L160	2.00	2,360.00	1180	review redline and revise draft term sheet, ██████████
Hashmall, Joseph	2/6/2024	L160	1.00	795.00	795	Review of edits to draft terms sheet, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	2/6/2024	L160	0.10	79.50	795	Email to Michelle Drake regarding ██████████
Hibray, Jean	2/6/2024	L160	0.20	100.00	500	Prepare redline of settlement terms
Drake, E.Michelle	2/9/2024	L160	0.70	826.00	1180	call with H Lodge re ██████████
Hashmall, Joseph	2/12/2024	L160	0.30	238.50	795	Email exchange with opposing counsel regarding terms sheet
Hashmall, Joseph	2/15/2024	L160	1.00	795.00	795	Review of Defendant's edits to terms sheet, internal emails regarding same
Hashmall, Joseph	2/15/2024	L200	0.20	159.00	795	Email to opposing counsel regarding status report to court
Hashmall, Joseph	2/16/2024	L200	1.20	954.00	795	Drafting status report to court, internal emails and emails with opposing counsel regarding same
Hibray, Jean	2/16/2024	L210	0.30	150.00	500	Finalize and submit case mgmt statement
Hibray, Jean	2/16/2024	L160	0.20	100.00	500	Emails re today's deadline
Hashmall, Joseph	2/19/2024	L160	0.10	79.50	795	Internal email regarding ██████████
Hashmall, Joseph	2/21/2024	L160	0.10	79.50	795	Email to Michelle Drake regarding ██████████
Hashmall, Joseph	2/22/2024	L160	0.20	159.00	795	Internal emails regarding ██████████
Drake, E.Michelle	2/23/2024	L160	1.00	1,180.00	1180	call with R Fliegel re settlement

Drake, E.Michelle	2/23/2024	L120	0.2	236.00	1180	Discuss [REDACTED] with J Hashmall
Hashmall, Joseph	2/23/2024	L200	0.80	636.00	795	Attend zoom status conference, follow up emails regarding same
Hashmall, Joseph	2/23/2024	L120	0.20	159.00	795	Call with Michelle Drake regarding [REDACTED]
Hibray, Jean	2/23/2024	L210	0.10	50.00	500	Docket call in information, check court docket
Hashmall, Joseph	2/26/2024	L200	0.80	636.00	795	Review of draft case management order, internal emails regarding same, edits to same, email to opposing counsel regarding same
Hibray, Jean	2/26/2024	L210	0.20	100.00	500	Draft proposed case mgmt order for J Hashmall
Albanese, John	2/27/2024	L100	0.10	89.50	895	Meet with litigation team regarding case status [REDACTED]
Hashmall, Joseph	2/27/2024	L200	0.30	238.50	795	Pre-filing review of case management order, internal emails and email to opposing counsel regarding same
Hashmall, Joseph	2/27/2024	L120	0.10	79.50	795	Case update email to client [REDACTED]
Hashmall, Joseph	2/27/2024	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	2/27/2024	L200	0.20	159.00	795	Email to opposing counsel regarding case management order
Hibray, Jean	2/27/2024	L210	0.30	150.00	500	Prepare cover sheet and submit prop order, email re same
Hashmall, Joseph	3/1/2024	L160	0.20	159.00	795	Email exchange with opposing counsel regarding terms sheet
Drake, E.Michelle	3/4/2024	NONE	0.50	590.00	1180	emails re settlement finalized
Hashmall, Joseph	3/4/2024	L160	0.20	159.00	795	Call with client [REDACTED]
Hashmall, Joseph	3/4/2024	L160	0.20	159.00	795	Call with client [REDACTED]
Hashmall, Joseph	3/4/2024	L160	0.20	159.00	795	Call with client [REDACTED]
Hashmall, Joseph	3/4/2024	L160	0.80	636.00	795	Review of draft revised terms sheet, internal emails regarding next steps in settlement
Hibray, Jean	3/4/2024	L160	0.10	50.00	500	Finalize terms sheet and circulate
Hashmall, Joseph	3/5/2024	L160	0.90	715.50	795	Review of draft settlement agreement, internal emails regarding [REDACTED]
Hibray, Jean	3/5/2024	L160	1.60	800.00	500	Draft settlement agreement, emails with J Hashmall
Hibray, Jean	3/6/2024	L160	0.30	150.00	500	Incorporate edits throughout settlement agreement, re circulate
Hashmall, Joseph	3/7/2024	L160	0.30	238.50	795	Call with client [REDACTED]
Hashmall, Joseph	3/8/2024	L160	2.40	1,908.00	795	Edits to draft settlement and FAC, internal emails regarding same
Hashmall, Joseph	3/11/2024	L160	0.80	636.00	795	Further edits to draft settlement and amended complaint
Hashmall, Joseph	3/11/2024	L200	0.20	159.00	795	Review of email from court clerk regarding case schedule
Drake, E.Michelle	3/12/2024	L160	1.40	1,652.00	1180	review redline and revise settlement agreement
Hashmall, Joseph	3/12/2024	L200	0.40	318.00	795	Review of case management order, internal emails regarding same, email to court regarding edit to same
Hashmall, Joseph	3/12/2024	L200	0.30	238.50	795	Internal emails regarding drafting motion for preliminary approval
Hashmall, Joseph	3/12/2024	L160	0.20	159.00	795	Internal email regarding draft settlement
Hibray, Jean	3/12/2024	L210	0.50	250.00	500	Review new orders, docketing of same; email with J Hashmall re date
Hashmall, Joseph	3/13/2024	L160	1.20	954.00	795	Edits to draft amended complaint and settlement agreement, email to opposing counsel regarding same
Hashmall, Joseph	3/19/2024	L160	0.20	159.00	795	Email to opposing counsel regarding amended complaint and settlement
Hibray, Jean	3/19/2024	L210	0.40	200.00	500	Begin draft of prelim approval memo's background section
Hashmall, Joseph	3/21/2024	L160	0.30	238.50	795	Email exchange with opposing counsel regarding draft settlement, amended complaint
Hibray, Jean	3/21/2024	L210	0.60	300.00	500	Finish preparing memo for prelim approval background sections
Hibray, Jean	3/21/2024	L210	0.10	50.00	500	Email with J Gionnette re amended complaint filing
Hashmall, Joseph	3/22/2024	L120	0.10	79.50	795	Review of schedule and upcoming deadlines in case
Hashmall, Joseph	3/22/2024	L200	0.20	159.00	795	Internal emails regarding filing of amended complaint

Hibray, Jean	3/22/2024	L210	0.10	50.00	500	Prep proof of service for SAC
Hashmall, Joseph	3/25/2024	L160	0.60	477.00	795	Email with opposing counsel regarding settlement documents, internal emails regarding same
Gionnette, Julie	3/26/2024	L210	0.80	244.00	305	Edits, formatting and review of second amended complaint
Hashmall, Joseph	3/26/2024	L200	0.70	556.50	795	Review of Defendant's proposed edits to amended complaint, emails with opposing counsel and internal emails regarding same
Hashmall, Joseph	3/28/2024	L200	1.90	1,510.50	795	Drafting preliminary approval brief
Hashmall, Joseph	3/28/2024	L200	0.40	318.00	795	Edits to second amended complaint
Hashmall, Joseph	3/28/2024	L160	0.30	238.50	795	Call with opposing counsel regarding preliminary approval, draft settlement
Gionnette, Julie	3/29/2024	L140	0.70	213.50	305	review and finalize second amended complaint, POS and Stipulation; file same in CA Sup. Ct. San Mateo County
Hashmall, Joseph	3/29/2024	L200	0.70	556.50	795	Pre-filing review of amended complaint and stipulation regarding same, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	3/29/2024	L200	4.00	3,180.00	795	Researching and drafting preliminary approval brief
Hashmall, Joseph	3/29/2024	L160	0.40	318.00	795	Emails to opposing counsel regarding settlement bids, amended complaint
Hashmall, Joseph	3/29/2024	L160	0.50	397.50	795	Emails to settlement administrators requesting bids
Hashmall, Joseph	4/1/2024	L160	0.30	238.50	795	Email exchange with potential admin regarding bid
Hashmall, Joseph	4/1/2024	L160	0.20	159.00	795	Email to opposing counsel regarding settlement materials
Hashmall, Joseph	4/2/2024	L160	0.30	238.50	795	Emails to potential admins with questions about bids
Hashmall, Joseph	4/2/2024	L160	0.80	636.00	795	Review of and edits to draft settlement exhibits, internal emails and email to opposing counsel regarding same
Hashmall, Joseph	4/2/2024	L160	0.20	159.00	795	Email to opposing counsel regarding settlement administration bids
Hibray, Jean	4/2/2024	L160	1.30	650.00	500	Draft exhibits to the current settlement agreement; email with J Hashmall re same
Drake, E.Michelle	4/3/2024	L120	0.10	118.00	1180	team call to touch base on next steps in litigation
Hashmall, Joseph	4/3/2024	L160	1.40	1,113.00	795	Review of Defendant's edits to settlement agreement, further edits to same internal emails regarding same
Hashmall, Joseph	4/3/2024	L160	0.20	159.00	795	Email to opposing counsel regarding draft settlement
Hashmall, Joseph	4/4/2024	L160	0.40	318.00	795	Internal email regarding edits to draft settlement
Hashmall, Joseph	4/5/2024	L200	0.20	159.00	795	Internal emails regarding preliminary approval brief
Hashmall, Joseph	4/5/2024	L160	1.00	795.00	795	Edits to draft settlement agreement, emails with opposing counsel regarding same, emails to settlement administrators regarding same
Hashmall, Joseph	4/8/2024	L160	0.80	636.00	795	Review of and edits to settlement materials
Hashmall, Joseph	4/8/2024	L160	0.40	318.00	795	Email exchange with opposing counsel regarding draft settlement documents
Hashmall, Joseph	4/8/2024	L160	0.40	318.00	795	Emails to administrators regarding bids, internal emails regarding same
Hashmall, Joseph	4/9/2024	L160	0.50	397.50	795	Review of administrator bids, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	4/9/2024	L160	0.70	556.50	795	Research regarding potential cy pres recipients, internal email regarding same
Drake, E.Michelle	4/10/2024	L160	2.10	2,478.00	1180	review redline and revise memo in support of preliminary settlement approval
Hashmall, Joseph	4/10/2024	L200	0.30	238.50	795	Internal emails regarding preliminary approval brief
Hashmall, Joseph	4/10/2024	L160	0.20	159.00	795	Email exchange with client [REDACTED]
Hashmall, Joseph	4/10/2024	L160	0.30	238.50	795	Email exchange with administrator regarding claims process
Hashmall, Joseph	4/10/2024	L160	1.80	1,431.00	795	Finalizing edits to settlement agreement, calls and emails to three clients [REDACTED]
Hashmall, Joseph	4/10/2024	L160	0.50	397.50	795	Internal emails and emails to opposing counsel regarding draft settlement
Hibray, Jean	4/10/2024	L160	0.50	250.00	500	Proof, finalize Settlement Agreement, prep timeline
Hashmall, Joseph	4/11/2024	L160	0.80	636.00	795	Calls with client [REDACTED]

Hashmall, Joseph	4/11/2024	L200	1.80	1,431.00	795	Edits to preliminary approval brief, internal emails regarding same
Hibray, Jean	4/11/2024	L210	0.50	250.00	500	Draft stip for prelim approval extension, finalize and file same
Hibray, Jean	4/11/2024	L210	0.20	100.00	500	Prepare basic decl, NMM for prelim approval
Hibray, Jean	4/11/2024	L210	0.30	150.00	500	Emails re prelim approval plan; call with M Drake re same
Hashmall, Joseph	4/12/2024	L200	2.20	1,749.00	795	Edits to settlement notices and preliminary approval papers, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	4/12/2024	L160	0.30	238.50	795	Call with admin and opposing counsel regarding edits to settlement notices and procedure
Hashmall, Joseph	4/15/2024	L200	0.30	238.50	795	Review of draft notice of name change, internal email regarding same
Hashmall, Joseph	4/15/2024	L160	0.80	636.00	795	Edits to draft settlement exhibits, internal emails and emails to opposing counsel and settlement administrator regarding same
Hibray, Jean	4/15/2024	L160	0.20	100.00	500	Finalize and file notice re name change
Hibray, Jean	4/15/2024	L160	0.50	250.00	500	Research name change procedures, prepare Notice re: plaintiff new last name for attorney review
Hashmall, Joseph	4/17/2024	L200	0.20	159.00	795	Review of revised notice of name change, internal emails regarding filing of same
Hashmall, Joseph	4/17/2024	L200	0.40	318.00	795	Review of Michelle Drake's edits to preliminary approval brief, internal emails regarding same
Hashmall, Joseph	4/17/2024	L200	1.00	795.00	795	Review of opposing counsel's edits to exhibits to settlement, internal emails, emails to admin and to opposing counsel regarding same
Hibray, Jean	4/17/2024	L160	0.20	100.00	500	Compile final agreement, exhibits in PDF with covers, email opposing
Hibray, Jean	4/17/2024	L210	0.10	50.00	500	Docket extension order
Hibray, Jean	4/17/2024	L210	0.30	150.00	500	Review rejection notice, edit Notice/Prop Order, emails re same
Hibray, Jean	4/17/2024	L160	0.70	350.00	500	Edits to finalize agreement Exhibits
Hashmall, Joseph	4/18/2024	L200	1.00	795.00	795	Final pre-filing review of preliminary approval motion, brief and exhibits
Hibray, Jean	4/18/2024	L160	0.10	50.00	500	Emails with opposing, set up link for same
Hibray, Jean	4/19/2024	L160	0.10	50.00	500	Update form, email opposing
Hibray, Jean	4/19/2024	L210	0.30	150.00	500	Finalize motion papers for prelim approval, file same; email re prop order
Hibray, Jean	4/19/2024	L210	1.00	500.00	500	Proof memo, input tables
Hibray, Jean	4/19/2024	L160	0.20	100.00	500	Finalize and file notice re name change, email prop order
Hibray, Jean	4/22/2024	L160	0.20	100.00	500	Finalize and file stip to dismiss prior plaintiffs, email prop order
Hibray, Jean	4/22/2024	L160	0.40	200.00	500	Review Cal. Rules and procedures re dismissal, draft stip re prior plaintiffs.
Hibray, Jean	4/22/2024	L160	0.10	50.00	500	Email with J Hashmall re request for dismissal doc
Hibray, Jean	4/22/2024	L210	0.20	100.00	500	Review clerk stamped copies of prelim approval papers, email packet to administrator
Hashmall, Joseph	4/24/2024	L160	0.40	318.00	795	Email to client regarding [REDACTED]
Hashmall, Joseph	4/26/2024	L160	0.30	238.50	795	Email with settlement administrator regarding settlement website
Hibray, Jean	5/3/2024	L210	0.10	50.00	500	Docket new orders
Albanese, John	5/29/2024	L100	0.10	89.50	895	Discuss [REDACTED] with litigation team.
Drake, E.Michelle	5/29/2024	L120	0.10	118.00	1180	meet with case team re schedule and next steps in litigation
Hashmall, Joseph	5/29/2024	L120	0.10	79.50	795	Litigation team meeting
Hashmall, Joseph	6/3/2024	L120	0.60	477.00	795	Email [REDACTED] to clients
Drake, E.Michelle	6/25/2024	L120	0.10	118.00	1180	meet with case team re schedule and next steps in litigation
Hashmall, Joseph	6/25/2024	L100	0.1	79.50	795	Team meeting
Hashmall, Joseph	7/10/2024	L160	0.20	159.00	795	Email exchange with potential administrator
Hashmall, Joseph	7/11/2024	L160	0.20	159.00	795	Update email to client [REDACTED]
Albanese, John	9/11/2024	L100	0.10	89.50	895	Discuss [REDACTED] with case team.

Drake, E.Michelle	9/11/2024	L250	0.10	118.00	1180	meet with team re next steps
Hashmall, Joseph	9/11/2024	L120	0.30	238.50	795	Internal emails regarding logistics of preliminary approval hearing
Hashmall, Joseph	9/11/2024	L120	0.20	159.00	795	Litigation team meeting
Hibray, Jean	9/11/2024	L160	0.30	150.00	500	Review prior orders, court preferences, emails re same in advance of hearing
Hashmall, Joseph	9/16/2024	L120	0.20	159.00	795	Email to opposing counsel regarding preliminary approval hearing
Hashmall, Joseph	9/18/2024	L160	0.30	238.50	795	Internal emails regarding communication with chambers on preliminary approval
Hashmall, Joseph	9/18/2024	L120	0.20	159.00	795	Email exchange with opposing counsel regarding preliminary approval
Hibray, Jean	9/18/2024	L160	0.10	50.00	500	Emails re prelim approval hearing, draft and send to chambers
Hibray, Jean	9/20/2024	L160	0.10	50.00	500	Review chambers response, update calendar accordingly
Hashmall, Joseph	10/8/2024	L160	1.00	795.00	795	Review of file in advance of preliminary approval hearing
Hashmall, Joseph	10/10/2024	L160	0.80	636.00	795	Review of file in advance of preliminary approval hearing
Hashmall, Joseph	10/17/2024	L120	0.20	159.00	795	Review of draft [REDACTED] client, internal email regarding same
Hibray, Jean	10/17/2024	L140	0.10	50.00	500	Review file and draft [REDACTED]
Hibray, Jean	10/18/2024	L140	0.30	150.00	500	Prepare and send [REDACTED] to clients (3)
Hashmall, Joseph	10/22/2024	L160	1.30	1,033.50	795	Review of file in advance of preliminary approval hearing
Hashmall, Joseph	10/23/2024	L160	0.80	636.00	795	Review of file in advance of preliminary approval, email to settlement administrator regarding same
Hashmall, Joseph	10/24/2024	L200	1.20	954.00	795	Preparation for preliminary approval hearing
Hashmall, Joseph	10/31/2024	L160	0.30	238.50	795	Emails with admin and opposing counsel to set time to discuss case
Hashmall, Joseph	11/1/2024	L200	1.20	954.00	795	Review of tentative order on preliminary approval, emails and calls with Michelle Drake and with opposing counsel regarding same
Hashmall, Joseph	11/1/2024	L160	1.10	874.50	795	Call with opposing counsel and administrator regarding preliminary approval, review of settlement documents in advance of same
Hibray, Jean	11/1/2024	L160	0.50	250.00	500	Review tentative ruling; emails with team re same.
Drake, E.Michelle	11/4/2024	L160	1.00	1,180.00	1180	Call with R Fliegel re edits to settlement agreement.
Hashmall, Joseph	11/4/2024	L160	1.00	795.00	795	Call with Michelle Drake and Rod Flegel regarding edits to settlement
Hashmall, Joseph	11/4/2024	L160	0.30	238.50	795	Drafting edits to settlement, internal emails regarding same
Hashmall, Joseph	11/4/2024	L200	0.40	318.00	795	Review of draft admin dec in support of approval, email exchange with admin regarding same
Hashmall, Joseph	11/4/2024	L200	1.30	1,033.50	795	Internal emails, email to administrator and email to opposing counsel regarding response to Court's tentative ruling
Hashmall, Joseph	11/4/2024	L200	0.20	159.00	795	Internal email regarding communication with the court
Hibray, Jean	11/4/2024	L160	0.10	50.00	500	Review rules, procedures, email on potential deadlines
Hibray, Jean	11/4/2024	L160	0.10	50.00	500	Set up shell for supplemental brief, email re same
Hibray, Jean	11/4/2024	L160	1.30	650.00	500	Review requested edits, implement throughout settlement paperwork, email attorney re same
Hibray, Jean	11/4/2024	L160	0.10	50.00	500	Email mediator's office for qualifications documentation
Hibray, Jean	11/4/2024	L140	0.10	50.00	500	Draft email to court regarding tentative, send same.
Drake, E.Michelle	11/5/2024	L160	2.60	3,068.00	1180	Review, redline, and revise draft amendments to settlement agreement and memo in support. Draft correspondence to Joe C. Hashmall and opposing counsel regarding same, as well as next steps and additional documents required to respond to the issues raised in the Court's order
Hashmall, Joseph	11/5/2024	L250	3.20	2,544.00	795	Drafting supplemental brief in support of preliminary approval, internal emails regarding same
Hashmall, Joseph	11/5/2024	L160	0.50	397.50	795	Emails with clients [REDACTED]
Hashmall, Joseph	11/5/2024	L160	0.50	397.50	795	Emails with opposing counsel and settlement administrator regarding settlement amendments

Drake, E.Michelle	11/6/2024	L160	0.40	472.00	1180	Correspondence with opposing counsel and review correspondence with settlement administrator regarding settlement timelines.
Drake, E.Michelle	11/6/2024	L120	0.2	236.00	1180	Team
Hashmall, Joseph	11/6/2024	L250	1.80	1,431.00	795	Revisions to settlement materials and supp brief in support of preliminary approval
Hashmall, Joseph	11/6/2024	L250	1.20	954.00	795	Internal emails regarding revisions to supp. brief in support of preliminary approval
Hashmall, Joseph	11/6/2024	L160	0.60	477.00	795	Emails with administrator regarding declaration in support of preliminary approval, email to opposing counsel regarding same
Hashmall, Joseph	11/6/2024	L120	0.20	159.00	795	Litigation team call
Hibray, Jean	11/6/2024	L160	0.10	50.00	500	Review process, email attorneys re contact methods for the court
Hibray, Jean	11/6/2024	L160	0.10	50.00	500	Email with attorney re [REDACTED]
Hibray, Jean	11/6/2024	L160	0.10	50.00	500	Email J Hashmall re clarifications needed on edits
Hibray, Jean	11/6/2024	L160	0.50	250.00	500	Draft named plaintiff declarations (3)
Hashmall, Joseph	11/7/2024	L250	0.80	636.00	795	Review of draft client declarations regarding settlement, internal email regarding same, emails to clients [REDACTED]
Hashmall, Joseph	11/7/2024	L250	2.20	1,749.00	795	Edits to draft supp. memo regarding preliminary approval, legal research regarding same, internal emails regarding same
Hashmall, Joseph	11/7/2024	L160	0.80	636.00	795	Review of revised settlement and exhibits, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	11/7/2024	L200	0.60	477.00	795	Internal emails regarding communications with chambers regarding request for extension, review of draft communication regarding same
Hibray, Jean	11/7/2024	L160	0.90	450.00	500	Review emails, client docs, edit plaintiff decs to integrate details; discussions [REDACTED]
Hibray, Jean	11/7/2024	L160	0.20	100.00	500	Draft and send email to court, follow up emails re same
Hashmall, Joseph	11/8/2024	L120	0.60	477.00	795	Internal emails regarding court communications and follow ups
Hashmall, Joseph	11/8/2024	L250	1.40	1,113.00	795	Emails with clients [REDACTED]
Hibray, Jean	11/8/2024	L160	0.50	250.00	500	Emails with J Hashmall re decs, review [REDACTED], update decs, send DocuSigns
Hashmall, Joseph	11/11/2024	L160	0.20	159.00	795	Internal email regarding revised settlement materials
Hashmall, Joseph	11/11/2024	L250	0.80	636.00	795	Emails with client and opposing counsel regarding revised settlement materials
Drake, E.Michelle	11/12/2024	L160	0.30	354.00	1180	Correspondence with opposing counsel re settlement proposal.
Hashmall, Joseph	11/12/2024	L120	0.30	238.50	795	Internal email regarding draft revised preliminary approval papers
Hashmall, Joseph	11/12/2024	L200	0.70	556.50	795	Internal emails and emails with the Court regarding scheduling of preliminary approval hearing
Hibray, Jean	11/12/2024	L140	0.10	50.00	500	Email court to check on new hearing date
Hashmall, Joseph	11/13/2024	L250	0.80	636.00	795	Internal emails regarding hearing schedule, emails with opposing counsel regarding revised documents for filing with the Court
Hashmall, Joseph	11/13/2024	L250	0.30	238.50	795	Internal emails regarding settlement documents, court date change
Hashmall, Joseph	11/13/2024	L160	0.20	159.00	795	Email to opposing counsel regarding revised discovery documents
Hibray, Jean	11/13/2024	L160	0.10	50.00	500	Email court re hearing date
Hashmall, Joseph	11/14/2024	L250	0.30	238.50	795	Internal emails regarding hearing dates
Hashmall, Joseph	11/15/2024	L160	0.20	159.00	795	Email exchange with settlement administrator regarding hearing schedule
Hashmall, Joseph	11/15/2024	L160	1.10	874.50	795	Review of revised settlement redlines, internal emails and email to opposing counsel regarding same
Hibray, Jean	11/15/2024	L160	0.20	100.00	500	Review judge email, update calendar accordingly
Hashmall, Joseph	11/20/2024	L160	0.20	159.00	795	Email to opposing counsel regarding revised settlement materials

Drake, E.Michelle	11/21/2024	L160	0.60	708.00	1180	Correspondence with opposing counsel regarding settlement edits
Hashmall, Joseph	11/21/2024	L160	0.30	238.50	795	Review of email from opposing counsel regarding settlement documents, internal email and email to opposing counsel regarding same
Hashmall, Joseph	11/22/2024	L160	0.50	397.50	795	Review of Defendant's proposed settlement edits, emails to Michelle Drake regarding same
Drake, E.Michelle	11/25/2024	L160	0.70	826.00	1180	Correspondence and follow up call with opposing counsel re revisions to settlement agreement
Hashmall, Joseph	11/25/2024	L160	0.50	397.50	795	Call with opposing counsel regarding edits to settlement
Hashmall, Joseph	11/27/2024	L120	0.20	159.00	795	Review of case status and deadlines
Hashmall, Joseph	11/29/2024	L160	0.30	238.50	795	Drafting email to opposing counsel regarding revised settlement agreement and supporting documents
Hashmall, Joseph	12/2/2024	L160	0.30	238.50	795	Email to opposing counsel regarding amended settlement materials
Hashmall, Joseph	12/4/2024	L120	0.20	159.00	795	Email to opposing counsel regarding revised settlement
Drake, E.Michelle	12/5/2024	L160	0.50	590.00	1180	Review redlines to settlement agreement and approve for filing.
Hashmall, Joseph	12/5/2024	L160	1.90	1,510.50	795	Review of Defendant's edits to settlement and supplemental brief regarding preliminary approval, internal emails and emails to opposing counsel regarding same
Hashmall, Joseph	12/6/2024	L120	0.50	397.50	795	Responding to client [REDACTED]
Hashmall, Joseph	12/6/2024	L160	0.40	318.00	795	Internal emails and emails to opposing counsel regarding signature-ready version of revised settlement
Hashmall, Joseph	12/6/2024	L200	1.60	1,272.00	795	Review of opposing counsel edits to supplemental brief regarding settlement, further edits to same, internal emails regarding same
Hashmall, Joseph	12/6/2024	L160	0.40	318.00	795	Emails to clients [REDACTED]
Hibray, Jean	12/6/2024	L160	0.40	200.00	500	Review redlines, accept/format agreement; send to opposing and [REDACTED] email with J Hashmall re same
Hashmall, Joseph	12/9/2024	L200	1.00	795.00	795	Review of revised exhibits to this week's filing, internal email regarding same, email to opposing counsel regarding same
Hibray, Jean	12/9/2024	L160	0.90	450.00	500	Prepare redline of settlement agreement versions, review changes against Amended Exhibits and incorporate additional edits where needed.
Hibray, Jean	12/9/2024	L160	0.20	100.00	500	Prepare packet to opposing, email re same
Hashmall, Joseph	12/10/2024	L200	1.00	795.00	795	Review of proofing edits to supplemental brief, internal emails regarding logistics of filing same
Hashmall, Joseph	12/10/2024	L200	0.40	318.00	795	Call with opposing counsel regarding this week's filing, internal email regarding same
Hashmall, Joseph	12/10/2024	L120	0.20	159.00	795	Email exchange with Michelle Drake regarding filing of supplemental brief
Hibray, Jean	12/10/2024	L200	1.00	500.00	500	Proof, format supplemental approval brief and exhibits in support
Hibray, Jean	12/10/2024	L160	0.10	50.00	500	Emails with J Hashmall re next steps
Hashmall, Joseph	12/11/2024	L200	0.30	238.50	795	Email exchange with opposing counsel regarding this week's filing
Hashmall, Joseph	12/12/2024	L200	0.30	238.50	795	Internal emails regarding filing of supplemental brief
Hibray, Jean	12/12/2024	L160	0.80	400.00	500	Prepare new copies of Exhibits with update covers, submit; email re same
Hibray, Jean	12/12/2024	L200	1.30	650.00	500	Prepare final exhibits, prepare final redlines, finalize brief, submit to court, emails re same
Drake, E.Michelle	12/13/2024	L160	0.40	472.00	1180	Review tentative order approving settlement.
Hibray, Jean	12/13/2024	L160	0.30	150.00	500	Check links for tentative, circulate upon posting. Email current order to counsel re same
Hashmall, Joseph	12/16/2024	L160	0.50	397.50	795	Emails with Court, opposing counsel and internal emails regarding final approval hearing date
Hashmall, Joseph	12/16/2024	L160	0.60	477.00	795	Review of revised preliminary approval order, internal emails and email to opposing counsel regarding same

Hibray, Jean	12/16/2024	L160	0.20	100.00	500	Finalize and submit prop order; prepare cover sheet and e-file as wel
Hibray, Jean	12/16/2024	L160	0.10	50.00	500	Update proposed PAO
Hibray, Jean	12/16/2024	L160	0.30	150.00	500	Update settlement timeline with estimated dates, update PAO chart re same; emails with team re same
Hashmall, Joseph	12/17/2024	L160	0.70	556.50	795	Emails to settlement administrator and internal emails regarding settlement approval developments
Hibray, Jean	12/17/2024	L160	0.20	100.00	500	Compile motion for prelim approval docs, email with admin re same
Hibray, Jean	12/17/2024	L160	0.10	50.00	500	Review clerk note, email J Hashmall re same
Hashmall, Joseph	12/19/2024	L120	0.20	159.00	795	Review of status of case, internal email regarding same
Hashmall, Joseph	12/20/2024	L160	0.30	238.50	795	Email exchange with opposing counsel regarding preliminary approva
Hashmall, Joseph	12/23/2024	L160	0.20	159.00	795	Internal emails regarding preliminary approval
Hibray, Jean	12/23/2024	L160	0.10	50.00	500	Review docket, email J Hashmall re new hearing date
Hashmall, Joseph	12/26/2024	L160	0.30	238.50	795	Email to the Court and internal email regarding preliminary approval
Hashmall, Joseph	12/27/2024	L160	0.60	477.00	795	Emails with court regarding settlement documents; internal emails regarding follow up to same
Hibray, Jean	12/27/2024	L160	0.10	50.00	500	Review timeline, email attorney re timing for prelim approval order required
Hashmall, Joseph	12/30/2024	L160	0.30	238.50	795	Email exchange with opposing counsel regarding settlement approval order
Hashmall, Joseph	12/31/2024	L160	2.20	1,749.00	795	Review of preliminary approval order, internal emails, emails with administrator, call and emails with opposing counsel regarding same
Hibray, Jean	12/31/2024	L160	0.50	250.00	500	Review preliminary approval order, update timeline, email team re issue with table of dates
Hashmall, Joseph	1/3/2025	L160	0.30	238.50	795	Email to opposing counsel regarding settlement administration schedule
Hibray, Jean	1/3/2025	L210	0.40	200.00	500	Prepare pro hac renewals, finalize and file
Hashmall, Joseph	1/6/2025	L160	0.30	238.50	795	Email exchange with opposing counsel regarding settlement administration details
Hashmall, Joseph	1/6/2025	L160	0.30	238.50	795	Internal email regarding [REDACTED]
Hashmall, Joseph	1/7/2025	L160	0.30	238.50	795	Review of emails between defendant and administrator regarding class list, email to opposing counsel regarding same
Hashmall, Joseph	1/8/2025	L120	0.10	79.50	795	Internal email regarding next steps in case with Michelle Drake
Hashmall, Joseph	1/8/2025	L160	0.60	477.00	795	Update emails to all [REDACTED] regarding preliminary approval
Hashmall, Joseph	1/16/2025	L160	0.30	238.50	795	Email exchange with opposing counsel regarding class member contact information
Hashmall, Joseph	1/22/2025	L160	0.40	318.00	795	Emails with opposing counsel and settlement administrator regarding class notice
Drake, E.Michelle	1/24/2025	L100	0.10	118.00	1180	Review case and determine next steps in litigation. Correspondence with team regarding same
Hashmall, Joseph	1/27/2025	L160	0.80	636.00	795	Pre-mailing review of draft postcard notices and IVR scripts, emails with administrator regarding edits to same
Hashmall, Joseph	1/28/2025	L160	0.80	636.00	795	Internal emails and emails with administrator regarding class list and addresses, and edits to notice
Hashmall, Joseph	1/29/2025	L160	0.30	238.50	795	Review of draft email notices, email to administrator regarding same
Brooks, Rachel K	2/4/2025	L160	0.60	204.00	340	Talked on the phone with Jean Hibray regarding settlement procedures for the Inflection class settlement; discussed the need to verify the court records included in class members' Inflection reports are inaccurate; and talked with Nick Howland regarding the upcoming tasks related to the
Hashmall, Joseph	2/4/2025	L100	0.20	159.00	795	Email exchange with client [REDACTED]
Hashmall, Joseph	2/4/2025	L160	2.30	1,828.50	795	Internal emails, emails with administrator, and with opposing counsel regarding logistics, data and staffing for claims review process

Hibray, Jean	2/4/2025	L160	0.50	250.00	500	Review agreement, emails; update timeline and docket events
Hibray, Jean	2/4/2025	L160	0.50	250.00	500	Call with R Brooks re settlement project
Hibray, Jean	2/4/2025	L160	0.30	150.00	500	Emails re claims review
Brooks, Rachel K	2/5/2025	L160	0.50	170.00	340	Met with Jean Hibray and Nick Howland to discuss court record confirmation required for class members who submit a sex offender claim or a mixed background claim related to the Inflection settlement. Discussed questions regarding next steps with Jean and Nick
Hashmall, Joseph	2/5/2025	L120	0.30	238.50	795	Review of settlement schedule and deadlines
Hashmall, Joseph	2/5/2025	L160	0.60	477.00	795	Internal emails regarding claims review process, emails with administrator regarding same
Hibray, Jean	2/5/2025	L160	0.60	300.00	500	Meet with R Brooks, N Howland re settlement project planning
Howland, Nicholas	2/5/2025	L100	0.50	170.00	340	Met with Jean and Rachel about Inflection class [REDACTED]
Brooks, Rachel K	2/6/2025	L160	0.30	102.00	340	Reviewed the Settlement Agreement and settlement website in preparation for validating class members' claims starting next week, and e-mailed Jean Hibray to confirm what information will be included in the claim submissions.
Hashmall, Joseph	2/6/2025	L160	0.30	238.50	795	Email exchange with opposing counsel regarding claims review and administrator
Hibray, Jean	2/6/2025	L160	0.10	50.00	500	Emails re settlement
Hashmall, Joseph	2/7/2025	L160	0.60	477.00	795	Emails with class members and with administrator regarding website function and claim form submission
Hashmall, Joseph	2/7/2025	L160	0.40	318.00	795	Call with opposing counsel regarding claims review process
Hashmall, Joseph	2/7/2025	L160	0.90	715.50	795	Internal emails regarding [REDACTED]
Hibray, Jean	2/7/2025	L160	0.30	150.00	500	Review and respond to class member inquiries
Hibray, Jean	2/7/2025	L160	0.20	100.00	500	Emails re status of settlement project
Brooks, Rachel K	2/10/2025	L160	0.40	136.00	340	Met with Jeff Pirrung, Jean Hibray, and Nick Howland to discuss the documents Jeff uploaded to ShareFile to assist with the evaluation of class members' claim submissions; discussed the best method for tracking the information; and talked with Jean about [REDACTED]
Hashmall, Joseph	2/10/2025	L160	1.40	1,113.00	795	Emails to administrator and to opposing counsel regarding claims review process set up
Hibray, Jean	2/10/2025	L160	0.90	450.00	500	Emails, review of shared file for claims review, meet with admin and review team on plans.
Howland, Nicholas	2/10/2025	L160	0.30	102.00	340	Call with settlement administrators.
Brooks, Rachel K	2/11/2025	L160	0.20	68.00	340	E-mailed back and forth with Joe Hashmall and Jean Hibray regarding procedures for verifying the accuracy of class members' claim submissions, especially class members submitting claims related to the sex offender registry.
Hashmall, Joseph	2/11/2025	L160	1.80	1,431.00	795	Review of claims data on Sharefile, emails with administrator, opposing counsel and internal emails regarding same
Hashmall, Joseph	2/11/2025	L160	0.80	636.00	795	Calls with class members with settlement questions
Hashmall, Joseph	2/11/2025	L120	0.60	477.00	795	Update email to clients [REDACTED]
Hibray, Jean	2/11/2025	L160	0.20	100.00	500	Draft and send email to review team re plan for claim review, and respond on chain re same
Howland, Nicholas	2/11/2025	L160	0.30	102.00	340	Looked at the SOR list and reviewed emails sent about the case
Brooks, Rachel K	2/12/2025	L160	0.40	136.00	340	E-mailed back and forth with Joe Hashmall regarding questions about class member qualifications, and e-mailed a class member regarding potential additional claims against other background check companies per Joe's instruction.
Hashmall, Joseph	2/12/2025	L160	0.40	318.00	795	Internal emails and emails to opposing counsel and administrator regarding claims review process

Hashmall, Joseph	2/12/2025	L160	1.80	1,431.00	795	Calls and emails to class members with settlement questions
Hashmall, Joseph	2/12/2025	L160	0.30	238.50	795	Email to client [REDACTED]
Hibray, Jean	2/12/2025	L160	0.30	150.00	500	Call with J Hashmall re website, draft proposal
Hibray, Jean	2/12/2025	L160	0.50	250.00	500	Review and respond to potential class members' inquiries
Hibray, Jean	2/12/2025	L200	0.50	250.00	500	Proof, format joint motion, draft proposed order
Hibray, Jean	2/12/2025	L160	0.40	200.00	500	Discuss claims review with reviewers
Brooks, Rachel K	2/13/2025	L160	1.50	510.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	2/13/2025	L160	0.50	397.50	795	Email exchange with settlement administrator regarding claims review process
Hashmall, Joseph	2/13/2025	L160	1.50	1,192.50	795	Internal emails regarding claims review
Hashmall, Joseph	2/13/2025	L160	1.60	1,272.00	795	Calls and emails with class members regarding settlement questions
Hibray, Jean	2/13/2025	L160	0.30	150.00	500	Emails re claims review sheet, update same
Howland, Nicholas	2/13/2025	L160	2.60	884.00	340	Searched the SOR list for records matching claimants.
Brooks, Rachel K	2/14/2025	L160	1.80	612.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	2/14/2025	L160	0.80	636.00	795	Internal emails regarding claims review process
Hibray, Jean	2/16/2025	L160	1.00	500.00	500	Claims review.
Hashmall, Joseph	2/17/2025	L160	0.40	318.00	795	Internal email regarding claims review process
Hibray, Jean	2/17/2025	L160	0.30	150.00	500	Discuss settlement project with team
Howland, Nicholas	2/17/2025	L160	1.70	578.00	340	Search the state SORs and national SOR to match names of potential claimants
Brooks, Rachel K	2/18/2025	L160	1.00	340.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	2/18/2025	L160	0.30	238.50	795	Internal emails regarding claims review process
Hibray, Jean	2/18/2025	L160	1.00	500.00	500	Claims review
Howland, Nicholas	2/18/2025	L160	2.30	782.00	340	Went through the spreadsheet [REDACTED].
Brooks, Rachel K	2/19/2025	L160	1.90	646.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	2/19/2025	L160	0.30	238.50	795	Email to opposing counsel regarding claims review process
Hashmall, Joseph	2/19/2025	L160	0.10	79.50	795	Email to Rachel Brooks regarding particular claim
Hashmall, Joseph	2/19/2025	L160	0.30	238.50	795	Internal emails regarding status of claims review process
Hibray, Jean	2/19/2025	L160	1.50	750.00	500	Claims review
Hibray, Jean	2/19/2025	L160	0.50	250.00	500	Emails and discussions re settlement project
Howland, Nicholas	2/19/2025	L160	3.60	1,224.00	340	Searched the state and national SOR for matches to potential claimants
Brooks, Rachel K	2/20/2025	L160	1.60	544.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	2/20/2025	L160	0.30	238.50	795	Email to class member, internal emails regarding class member inquires generally
Hashmall, Joseph	2/20/2025	L160	0.30	238.50	795	Call with class member
Hashmall, Joseph	2/20/2025	L160	0.50	397.50	795	Email exchange with opposing counsel regarding claims process

Hibray, Jean	2/20/2025	L160	1.50	750.00	500	Claims review
Hibray, Jean	2/20/2025	L160	0.50	250.00	500	Meet with team re [REDACTED]
Howland, Nicholas	2/20/2025	L160	1.90	646.00	340	Compared the potential claimants to the national and state SORs
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	2/21/2025	L160	1.10	374.00	340	
Hashmall, Joseph	2/21/2025	L160	0.30	238.50	795	Internal email following up on call with opposing counsel on claims process
Hashmall, Joseph	2/21/2025	L160	0.50	397.50	795	Call with opposing counsel regarding claims and settlement administrator
Hibray, Jean	2/21/2025	L160	1.20	600.00	500	Claims review
Howland, Nicholas	2/21/2025	L160	0.50	170.00	340	Matched claimants to the SOR records. Noted matches and non matches
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	2/22/2025	L160	1.30	442.00	340	
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	2/24/2025	L160	2.60	884.00	340	
Hashmall, Joseph	2/24/2025	L160	0.20	159.00	795	Internal email regarding claim validation
Hashmall, Joseph	2/24/2025	L160	0.40	318.00	795	Email exchange with administrator regarding class member questions
Hibray, Jean	2/24/2025	L160	1.80	900.00	500	Claims review
Hashmall, Joseph	2/25/2025	L120	0.20	159.00	795	Review of case status, deadlines, etc
Hashmall, Joseph	2/25/2025	L160	0.40	318.00	795	Emails with class member with settlement questions
Hibray, Jean	2/25/2025	L160	1.50	750.00	500	Claims review
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	2/26/2025	L160	3.30	1,122.00	340	
Hashmall, Joseph	2/26/2025	L160	0.30	238.50	795	Call with class member with settlement questions
Hashmall, Joseph	2/26/2025	L160	0.40	318.00	795	Internal emails and email to opposing counsel regarding claims review process
Hashmall, Joseph	2/26/2025	L160	1.00	795.00	795	Calls with class members with settlement questions
Hibray, Jean	2/26/2025	L160	1.30	650.00	500	Claims review
						Work to get additional staff member up and running on claims review project (permissions, training, assignments)
Hibray, Jean	2/26/2025	L160	1.00	500.00	500	
Howland, Nicholas	2/26/2025	L160	3.90	1,326.00	340	Compared claimant information to SOR records. Saved relevant information in One Drive.
Mahmood, Talia	2/26/2025	L100	4.00	1,360.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	2/27/2025	L160	1.80	612.00	340	
Hashmall, Joseph	2/27/2025	L160	0.60	477.00	795	Emails with opposing counsel and internal emails regarding claims administrator
Hibray, Jean	2/27/2025	L160	1.80	900.00	500	Claims review
Hibray, Jean	2/27/2025	L160	0.20	100.00	500	Review and respond to caller, email re same
						Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Mahmood, Talia	2/27/2025	L100	4.60	1,564.00	340	

Brooks, Rachel K	2/28/2025	L160	1.80	612.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hibray, Jean	2/28/2025	L160	2.30	1,150.00	500	Claims review
Howland, Nicholas	2/28/2025	L160	3.10	1,054.00	340	Compared [REDACTED] verify information.
Drake, E.Michelle	3/3/2025	L100	0.10	118.00	1180	Meet to discuss upcoming deadlines, next steps in case.
Hashmall, Joseph	3/3/2025	L120	0.70	556.50	795	Downloading and reviewing notice of judicial reassignment, internal emails regarding same
Hashmall, Joseph	3/3/2025	L160	0.80	636.00	795	Emails with clients [REDACTED], emails with administrator regarding same
Hibray, Jean	3/3/2025	L160	1.00	500.00	500	Claims review
Hibray, Jean	3/3/2025	L160	0.20	100.00	500	Emails re settlement
Hibray, Jean	3/3/2025	L100	0.10	50.00	500	Meet to discuss upcoming deadlines, next steps in case.
Mahmood, Talia	3/3/2025	L100	4.20	1,428.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Hashmall, Joseph	3/4/2025	L160	0.10	79.50	795	Internal email regarding class member voicemails
Hibray, Jean	3/4/2025	L160	1.00	500.00	500	Claims Review
Howland, Nicholas	3/4/2025	L160	1.70	578.00	340	Compared submissions to state and national SORs to verify potential claims.
Brooks, Rachel K	3/5/2025	L160	1.50	510.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	3/5/2025	L160	0.10	79.50	795	Voicemail to class member with settlement questions
Hibray, Jean	3/5/2025	L160	1.80	900.00	500	Claims review
Mahmood, Talia	3/5/2025	L100	4.00	1,360.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Brooks, Rachel K	3/6/2025	L160	1.20	408.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hibray, Jean	3/6/2025	L160	1.80	900.00	500	Claims review
Mahmood, Talia	3/6/2025	L100	4.00	1,360.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Brooks, Rachel K	3/7/2025	L160	1.70	578.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	3/7/2025	L160	0.20	159.00	795	Internal email regarding claims review process
Hibray, Jean	3/7/2025	L160	0.20	100.00	500	Review and respond to settlement inquiries
Hibray, Jean	3/7/2025	L160	0.20	100.00	500	Review claims work to date, gather and circulate review stats
Howland, Nicholas	3/7/2025	L160	2.50	850.00	340	Compared claimant submissions to state and national SORs to verify potential claims.
Hibray, Jean	3/9/2025	L160	1.80	900.00	500	Claims review
Brooks, Rachel K	3/10/2025	L160	1.60	544.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	3/10/2025	L120	0.30	238.50	795	Review of case file, status and deadlines
Hashmall, Joseph	3/10/2025	L160	0.30	238.50	795	Internal email regarding status of claims process
Hashmall, Joseph	3/10/2025	L160	0.60	477.00	795	Emails with client [REDACTED] with administrator regarding [REDACTED]

Hibray, Jean	3/10/2025	L160	2.00	1,000.00	500	Claims review
Howland, Nicholas	3/10/2025	L160	2.10	714.00	340	Compared claimant and state and national SORs to confirm potential claims.
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/11/2025	L160	1.50	510.00	340	
Hashmall, Joseph	3/11/2025	L160	0.30	238.50	795	Internal emails regarding claims review process
Hibray, Jean	3/11/2025	L160	2.30	1,150.00	500	Claims review
						Reviewed potential claimant submissions. Reviewed state and national SORs to confirm potential claims.
Howland, Nicholas	3/11/2025	L160	6.80	2,312.00	340	
Mahmood, Talia	3/11/2025	L100	1.80	612.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/12/2025	L160	1.70	578.00	340	
Hashmall, Joseph	3/12/2025	L160	0.40	318.00	795	Call with class member, internal email regarding same
Howland, Nicholas	3/12/2025	L160	2.30	782.00	340	Compare claimants information to the state and national SOR to confirm potential claims
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/13/2025	L160	1.30	442.00	340	
Hibray, Jean	3/13/2025	L160	0.80	400.00	500	Claims review
Hibray, Jean	3/13/2025	L160	0.10	50.00	500	Email with opposing counsel re next steps
Howland, Nicholas	3/13/2025	L160	2.40	816.00	340	Compared claimant submissions to Texas state and nation SOR.
						Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Mahmood, Talia	3/13/2025	L100	1.00	340.00	340	
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/14/2025	L160	1.60	544.00	340	
						Review of order rescheduling final approval, internal emails and emails to administrator regarding same
Hashmall, Joseph	3/14/2025	L200	0.60	477.00	795	
Hibray, Jean	3/14/2025	L160	0.10	50.00	500	Review order on hearing date, docket accordingly
Hibray, Jean	3/16/2025	L160	1.80	900.00	500	Claims review
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/17/2025	L160	1.60	544.00	340	
Hashmall, Joseph	3/17/2025	L160	0.30	238.50	795	Internal email regarding claims review process
Hibray, Jean	3/17/2025	L160	0.10	50.00	500	Emails re [REDACTED]
						Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Mahmood, Talia	3/17/2025	L100	2.50	850.00	340	
						Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/18/2025	L160	1.40	476.00	340	
Hashmall, Joseph	3/18/2025	L160	0.20	159.00	795	internal email regarding claims process
Hibray, Jean	3/18/2025	L160	1.00	500.00	500	Calls, discussions re [REDACTED]

Hibray, Jean	3/18/2025	L160	0.20	100.00	500	Emails re settlement
Howland, Nicholas	3/18/2025	L160	3.00	1,020.00	340	Compared claimant submissions information to the state and national SORs to confirm potential claims.
Mahmood, Talia	3/18/2025	L100	1.50	510.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Brooks, Rachel K	3/19/2025	L160	1.20	408.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hibray, Jean	3/19/2025	L160	0.80	400.00	500	Emails re [REDACTED]
Howland, Nicholas	3/19/2025	L160	2.90	986.00	340	Compared claimant information to state and national SORs to confirm potential claims
Mahmood, Talia	3/19/2025	L100	4.50	1,530.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Brooks, Rachel K	3/20/2025	L160	1.80	612.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	3/20/2025	L160	0.30	238.50	795	Internal email exchange regarding [REDACTED]
Hibray, Jean	3/20/2025	L160	0.10	50.00	500	Prepare updated review status, emails re settlement
Howland, Nicholas	3/20/2025	L160	4.10	1,394.00	340	Compared claimant submissions to state and national SORs to verify potential claims.
Mahmood, Talia	3/20/2025	L100	3.90	1,326.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Hashmall, Joseph	3/21/2025	L160	0.30	238.50	795	Call with class member with claim form and settlement questions
Howland, Nicholas	3/21/2025	L160	1.10	374.00	340	Compared claimant submissions to state and national SORs to verify potential claims.
Mahmood, Talia	3/21/2025	L100	3.50	1,190.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Brooks, Rachel K	3/24/2025	L160	1.60	544.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Brooks, Rachel K	3/25/2025	L160	1.40	476.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Howland, Nicholas	3/25/2025	L160	3.80	1,292.00	340	Compared claimant submissions to state and national SORs to confirm potential claims.
Brooks, Rachel K	3/26/2025	L160	1.30	442.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Mahmood, Talia	3/26/2025	L100	0.90	306.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.
Brooks, Rachel K	3/27/2025	L160	1.60	544.00	340	Compared class members' information to sex offender registries to verify whether each class member was on the registry, updated the shared Excel spreadsheet with relevant information, and saved PDFs of hits (or lack of hits) on the registries in OneDrive as needed.
Hashmall, Joseph	3/27/2025	L160	0.40	318.00	795	Call with class member with settlement questions
Howland, Nicholas	3/27/2025	L160	1.10	374.00	340	Compared claimant submissions to state and national SORs to verify potential claims.
Mahmood, Talia	3/27/2025	L100	0.40	136.00	340	Checking State and National SOR sites and logging whether or not each person is in fact listed on any SOR.

Hashmall, Joseph	4/23/2025	L160	0.50	397.5	795	Review of draft reminder notice, internal emails and email to opposing counsel regarding same
Hashmall, Joseph	4/23/2025	L200	2.50	1987.5	795	Drafting fee petition, emails with settlement administrator regarding same
Hibray, Jean	4/23/2025	L160	0.20	100	500	Review license photo from class member, complete claim review for consumer
Hibray, Jean	4/23/2025	L160	0.10	50	500	Redline reminder notice with requested edits
Hibray, Jean	4/23/2025	L160	0.20	100	500	Review claims review, pull stats for attorney
Hibray, Jean	4/23/2025	L160	0.10	50	500	Emails re reminder notice
Howland, Nicholas	4/23/2025	L160	1.40	476	340	Compared claimant submissions to state and national SOR to confirm potential claims.
Hashmall, Joseph	4/25/2025	L160	0.60	477	795	Emails with administrator and with opposing counsel regarding reminder notices, claims review
Hashmall, Joseph	4/25/2025	L200	2.50	1987.5	795	Drafting and revising fee petition, internal email regarding same
Hibray, Jean	4/25/2025	L160	0.30	150	500	Review emails re claims review, reminder notices; docket accordingly
Hashmall, Joseph	4/28/2025	L200	0.30	238.5	795	Emails with settlement administrator regarding stats needed for fee petition
Hashmall, Joseph	4/28/2025	L200	0.80	636	795	Drafting and revising fee petition
Hashmall, Joseph	4/29/2025	L200	0.70	556.5	795	Editing fee petition with updated numbers and figures, both from admin and internal figures
Hashmall, Joseph	4/30/2025	L200	0.90	715.5	795	Edits to draft fee petition
Hashmall, Joseph	4/30/2025	L160	0.30	238.5	795	Call with class member with settlement questions, internal emails regarding same
Hashmall, Joseph	4/30/2025	L200	0.40	318	795	Internal emails regarding [REDACTED]
Hibray, Jean	4/30/2025	L160	1.30	650	500	Claims review
Hibray, Jean	4/30/2025	L160	0.30	150	500	Run [REDACTED], email with J Hashmall re same
Hibray, Jean	4/30/2025	L160	1.00	500	500	Review fee entries, reconcile meetings, review [REDACTED]
Howland, Nicholas	5/1/2025	L160	1.50	510	340	Compared claimant submissions to state and national SOR to confirm potential claims.
Hibray, Jean	5/2/2025	L160	1.30	650	500	Claims review
Hashmall, Joseph	5/5/2025	L200	0.30	238.5	795	Internal emails regarding [REDACTED]
Hashmall, Joseph	5/5/2025	L200	1.50	1192.5	795	Review of Michelle Drake's edits to fee petition, further edits to same