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8 Class Counsel

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

12 PAULA SPARKMAN, on behalf of herself
13 and all others similarly situated,
14 Plaintiff,
15 v.
16 COMERICA BANK, a foreign corporation,
17 and CONDUENT STATE & LOCAL
18 SOLUTIONS, INC., a foreign corporation,
19 Defendants.

NO. 4:23-cv-02028-DMR

**DECLARATION OF E. MICHELLE
DRAKE IN SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEYS’ FEES,
COSTS, AND SERVICE AWARD**

The Honorable Donna M. Ryu

CLASS ACTION

DATE: December 11, 2025
TIME: 1:00 p.m.
LOCATION: COURTROOM 4 – 3RD FLOOR

18 I, E. Michelle Drake, hereby declare as follows:

- 19 1. I am one of Plaintiff’s Counsel in the above-captioned matter.
- 20 2. I submit this Declaration in support of Plaintiff’s Motion for Attorneys’ Fees, Costs,
21 and Service Award.
- 22 3. My firm, along with Terrell Marshall Law Group, took this case on a contingency
23 basis. My firm has received no reimbursement on this matter to date.
- 24 4. I have significant experience litigating class action cases.¹ This experience, along
25 with my firm’s general experience and reputation in complex litigation,² was instrumental to
26

27 ¹ See generally E. Michelle Drake Biography, available at <https://bergermontague.com/drake/>.
² See generally About Berger Montague, available at <https://bergermontague.com/about/>.

1 efficiently and effectively litigating and negotiating this case, and which resulted in the settlement
2 here.

3 5. Berger Montague’s hourly rates are regularly accepted by courts throughout the
4 country for purposes of class action fee awards. *See, e.g., In re Domestic Drywall Antitrust Litig.*,
5 No. 13-md-2437, 2018 WL 3439454, *20 (E.D. Pa. July 17, 2018) (in case in Berger Montague’s
6 headquarters’ district, holding that the hourly rates claimed by Berger, among other firms, were
7 “well within the range of rates charged by counsel in this district in complex cases”); *Devlin v.*
8 *Ferrandino & Son, Inc.*, No. 15-4976, 2016 WL 7178338, *10 (E.D. Pa. Dec. 9, 2016) (“[T]he
9 hourly rates for Class Counsel [including Berger Montague] are well within the range of what is
10 reasonable and appropriate in this market”); *see also Howell v. Checkr, Inc.*, No. 3:17-cv-04305-
11 SK, ECF No. 82 (N.D. Cal. Dec. 13, 2018) (final approval order approving Berger Montague’s fee
12 request in case in this Circuit, which was supported by lodestar cross-check using Berger
13 Montague’s standard hourly rates); *Douglas v. DHI Group, Inc.*, No. 2018-1-CV-331732, Order
14 (Santa Clara Cnty., Cal. Super. Ct. Aug. 6, 2019) (same); *Lee v. The Hertz Corp.*, No. CGC-15-
15 547520, Order (San Fran. Cnty., Cal Super. Ct. Aug. 30, 2019) (order approving fees and costs,
16 specifically finding lodestar cross-check to support reasonableness of fee award, including hours
17 and rates of Berger Montague); *Terrell v. Costco Wholesale Corp.*, No. 16-2-19140-1, Order (King
18 Cnty., Wash. Super. Ct. June 19, 2018) (order approving fees and costs and stating that Berger
19 Montague’s hourly rates “are reasonable given the experience and skill of counsel”).

20 6. Berger Montague’s time records are maintained in accordance with industry
21 standards to ensure reliability and transparency. The firm’s formal policy requires all
22 timekeepers—including attorneys and support staff—to keep records of time worked
23 contemporaneously and to provide sufficient detail to convey the nature and merit of the work
24 performed. To ensure each time entry contains sufficient detail, Berger Montague requires time
25 entries to include both matter numbers (corresponding to the specific case) and task codes
26 (corresponding to the type of work performed). The firm uses the widely-accepted ABA Litigation
27 Code Set, which includes 29 task codes spread across 5 stages of litigation (e.g., Pre-Trial

1 Pleadings and Motions, Discovery, etc.) to allocate time to particular tasks. This model, endorsed
 2 by courts, ensures that time is billed in a uniform and task-oriented manner. Timekeepers are also
 3 required to provide narrative descriptions setting forth the case-specific tasks. This manner of time-
 4 keeping, with contemporaneous records and detailed descriptions broken down by task, provides
 5 a level of accountability that courts nationwide routinely recommend when scrutinizing
 6 applications for attorneys' fees. *Deary v. City of Gloucester*, 9 F.3d 191, 197-98 (1st Cir. 1993)
 7 ("In order to recover fees, attorneys must submit a full and precise accounting of their time,
 8 including specific information about number of hours, dates, and the nature of the work
 9 performed."); *Bode v. United States*, 919 F.2d 1044, 1047 (5th Cir. 1990) (collecting cases)
 10 ("[C]ourts customarily require the applicant to produce contemporaneous billing records or other
 11 sufficient documentation so that the district court can fulfill its duty to examine the application.").

12 7. Using Berger Montague's current hourly rates, the firm's lodestar is \$57,018.00. A
 13 table of the timekeepers on this matter is below, and a true and correct copy of the underlying
 14 entries is attached hereto as Exhibit A, with redactions for attorney-client privilege and work
 15 product.

16 Timekeeper	17 Position	18 Atty. Yrs. Of Exp.	19 Hourly Rate	20 Hours Worked	21 Lodestar
Rios, Sophia	Shareholder	10	\$820	30.3	\$24,846.00
O'Connor Grant, Marika	Associate	4	\$640	28	\$17,920.00
Gionnette, Julie	Legal Assistant		\$305	20.7	\$6,313.50
Hibray, Jean	Paralegal		\$500	7.3	\$3,650.00
Drake, E. Michelle	Executive Shareholder	24	\$1180	2.8	\$3,304.00
Albanese, John	Shareholder	13	\$895	1.1	\$984.50
23 Total				90.2	\$57,018.00

24 8. This lodestar does not include time that was considered by counsel as purely
 25 administrative, not benefitting the Settlement Class, or as arguably excessive. Also not reflected in
 26 the lodestar is the additional time Berger Montague will expend to prepare the motion for final
 27

1 approval, attend the final approval hearing, and continue to monitor settlement administration
2 through distribution.

3 9. To date, Berger Montague has additionally incurred \$419.05 in out-of-pocket costs,
4 for which no reimbursement has been received. These costs were necessary to the successful
5 resolution of this matter. Berger Montague has controls and processes in place to control costs
6 including: requiring multiple approvals for large expert costs, requiring coach or economy class
7 airfare bookings, and not reimbursing for items like alcohol, for which a paying client would not
8 normally be charged. A table summarizing the categories of those costs is below.

9

Category	Amount
Computer Research	\$16.85
Filing & Misc. Fees	\$402.00
Reproduction costs scans	\$0.20
Total	\$419.05

10
11
12
13
14 The foregoing statement is made under penalty of perjury, and is true and correct to the
15 best of my knowledge and belief.

16 Date: October 9, 2025

17 /s/E. Michelle Drake
18 E. Michelle Drake, Admitted *Pro Hac Vice*

Exhibit A

Date	Staff	Hours	Activity	Comments
1/18/2023	Schlanger, Daniel A.	1.4	Analysis/Strategy	Prepare for meeting with Ms. Sparkman, including review of documents (.6); meet with Ms. Sparkman re facts and relevant law applicable to her dispute (.7); emails with Ms. Sparkman re same (.1) .
1/19/2023	Schlanger, Daniel A.	0.2	Review/analyze	Review documents relating to case and forward to paralegal.
2/15/2023	Schlanger, Daniel A.	0.5	Analysis/Strategy	Confer with B. Terrell re legal strategy and forward relevant documents to her office.
3/7/2023	Schlanger, Daniel A.	0.1	Analysis/Strategy	Review email from Blythe Chandler re next steps and re meeting about case.
3/17/2023	Schlanger, Daniel A.	0.4	Analysis/Strategy	Confer with Blythe Chandler re facts and legal strategy.
3/27/2023	Schlanger, Daniel A.	0.2	Analysis/Strategy	Email with Blythe Chandler re legal strategy.
3/28/2023	Schlanger, Daniel A.	0.6	Analysis/Strategy	Zoom call with TMLG re facts and legal strategy, class definition, next steps (.4); prepare for call (.2).
4/12/2023	Schlanger, Daniel A.	0.7	Review/analyze	Review draft complaint and provide feedback to TMLG attorneys.
4/18/2023	Schlanger, Daniel A.	0.2	Review/analyze	Emails with TMLG re draft complaint and sending over documents.
4/19/2023	Schlanger, Daniel A.	0.4	Review/analyze	Review revised complaint and email TMLG and BM re same.
4/21/2023	Schlanger, Daniel A.	0.2	Analysis/Strategy	Emails with B. Terrell re next steps.
4/24/2023	Schlanger, Daniel A.	1.2	Draft/revise	Revising draft complaint (1 hr.); email to TMLG and BM attorneys re same (.2)
4/25/2023	Schlanger, Daniel A.	1.5	Draft/revise	Additional revisions to complaint. (.8); emails with TMLG and BM re same (.4); proposing slightly modified class definition (.3)
5/4/2023	Schlanger, Daniel A.	0.2	Analysis/Strategy	Meeting with Beth Terrell regarding coordination of work
5/8/2023	Schlanger, Daniel A.	0.1	Draft/revise	Review draft PHV
5/17/2023	Schlanger, Daniel A.	0.1	Draft/revise	Review and approve phv
5/18/2023	Schlanger, Daniel A.	0.3	Analysis/Strategy	Emails with co-counsel re proposed stipulation, and sending over proposed additional language to add to it.
6/15/2023	Schlanger, Daniel A.	1.0	Review/analyze	Review defendant's motion to dismiss (.6); emails with co-counsel re same and re briefing schedule (.4)
6/20/2023	Schlanger, Daniel A.	0.9	Research	Review case law relied upon by defendant in preparation for call with co-counsel about opposition (.5); call with co-counsel re legal issues related to opposition (.4)
6/23/2023	Schlanger, Daniel A.	2.8	Research	Legal research in connection with revisions to opposition brief (.8); revisions to opposition brief (2)
6/25/2023	Schlanger, Daniel A.	1.1	Review/analyze	Review draft opposition to strike jury demand and line edit same.

Date	Staff	Hours	Activity	Comments
7/11/2023	Schlanger, Daniel A.	0.2	Communicate (other outside counsel)	Emails with co-counsel re case scheduling.
7/31/2023	Schlanger, Daniel A.	0.4	Draft/revise	Review and revise draft scheduling order (.3); emails re same (.1)
8/1/2023	Schlanger, Daniel A.	0.4	Review/analyze	Review draft RFP's and Rogs and email to co-counsel re same.
8/2/2023	Schlanger, Daniel A.	0.5	Communicate (other outside counsel)	Telephone conference with co-counsel re discovery request related issues.
8/7/2023	Schlanger, Daniel A.	0.5	Review/analyze	Review order on motion to dismiss/strike (.4); email to co-counsel (.1)
8/29/2023	Schlanger, Daniel A.	0.4	Communicate (other external)	Review emails with opposing counsel and weigh in on proposed new briefing schedule. (.2) Brief telephone conference with cocounsel regarding case (.2)
9/21/2023	Schlanger, Daniel A.	0.2	Analysis/Strategy	Email with cocounsel regarding our opposition to second MTD
9/28/2023	Schlanger, Daniel A.	1.2	Draft/revise	Revising and providing comments on opposition to second motion to dismiss (1); email with co-counsel regarding edits and brief more generally. (.2)
10/26/2023	Schlanger, Daniel A.	0.3	Analysis/Strategy	Confer with cocounsel regarding hearing.
11/20/2023	Schlanger, Daniel A.	0.3	Analysis/Strategy	Zoom call with TMLG attorney Blythe Chandler regarding next steps in case.
12/21/2023	Schlanger, Daniel A.	0.4	Review/analyze	review court decision on second motion to dismiss.
12/29/2023	Schlanger, Daniel A.	0.3	Communicate (with client)	email to client regarding motion to dismiss decision.
1/3/2024	Schlanger, Daniel A.	0.3	Communicate (other outside counsel)	Review detailed emails from co-counsel re settlement status and class data.
1/5/2024	Schlanger, Daniel A.	0.5	Analysis/Strategy	Zoom call with co-counsel regarding settlement and next litigation steps.
1/19/2024	Schlanger, Daniel A.	0.4	Analysis/Strategy	Emails with co-counsel and reviewing email from opposing counsel re substitution of parties and conferring with co-counsel re tolling agreement.
1/22/2024	Schlanger, Daniel A.	0.2	Review/analyze	Review and approve proposed stipulation re substitution of parties.
4/12/2024	Schlanger, Daniel A.	0.1	Review/analyze	Review oc email re production of documents and forward to paralegals.
5/10/2024	Schlanger, Daniel A.	0.2	Analysis/Strategy	Emails with cocounsel re discovery issues.
5/16/2024	Schlanger, Daniel A.	0.3	Draft/revise	Review and revise 30b6 notice
6/20/2024	Schlanger, Daniel A.	0.1	Settlement/Non-Binding ADR	Review email from opposing counsel re mediation.
7/1/2024	Schlanger, Daniel A.	0.2	Settlement/Non-Binding ADR	Review email from cocounsel to opposing counsel re mediation and discovery issues. Confer with co-counsel regarding proposed mediator.

Date	Staff	Hours	Activity	Comments
7/2/2024	Schlanger, Daniel A.	0.1	Settlement/Non-Binding ADR	Continued emails throughout day regarding mediation.
7/9/2024	Schlanger, Daniel A.	0.1	Settlement/Non-Binding ADR	Confer with cocounsel re mediators and propose a mediator.
7/19/2024	Schlanger, Daniel A.	0.3	Review/analyze	Review judge linares disclosures and email cocounsel re same.
8/9/2024	Schlanger, Daniel A.	0.1	Draft/revise	Review and revise mid-discovery statement.
9/6/2024	Schlanger, Daniel A.	0.9	Draft/revise	Review and revise mediation statement (.7); email to co-counsel re same. (.2)
10/22/2024	Schlanger, Daniel A.	3.3	Draft/revise	Revising declaration in support of class certification and all related exhibits.
10/28/2024	Schlanger, Daniel A.	1.5	Review/analyze	Reviewing documents relating to net worth of Defendant
10/28/2024	Schlanger, Daniel A.	3.0	Settlement/Non-Binding ADR	Drafting and revising supplemental mediation brief.
11/8/2024	Schlanger, Daniel A.	1.5	Settlement/Non-Binding ADR	Prepare for zoom conference with co-counsel and client regarding mediation. (.8); attend mediation prep session with cocounsel and client (.7)
11/11/2024	Schlanger, Daniel A.	8.0	Settlement/Non-Binding ADR	Prepare for and attend all day mediation.
11/12/2024	Schlanger, Daniel A.	0.2	Review/analyze	Review cocounsel's detailed email regarding next steps in discovery, deponents, dates, etc. and email cocounsel with question regarding same.
11/19/2024	Schlanger, Daniel A.	1.0	Draft/revise	Review and revise MOL in support of class certification (.9) and email to counsel regarding same. (.1)
11/19/2024	Schlanger, Daniel A.	0.4	Settlement/Non-Binding ADR	Telephone conference with cocounsel regarding settlement and discovery issues (.4); review and propose minor revision to response to mediator (.2)
11/20/2024	Schlanger, Daniel A.	0.3	Settlement/Non-Binding ADR	Emails with cocounsel regarding settlement issues after review of emails from co-counsel regarding class data and opposing counsel's concerns.
12/4/2024	Schlanger, Daniel A.	0.3	Depositions	Review detailed emails from cocounsel re depositions and email to cocounsel regarding rescheduling one of them.
12/13/2024	Schlanger, Daniel A.	0.5	Settlement/Non-Binding ADR	Review email from cocounsel and opposing counsel re settlement in principle (.1); review and revise term sheet (.4)
12/19/2024	Schlanger, Daniel A.	0.2	Settlement/Non-Binding ADR	Review and respond to email from cocounsel regarding settlement status.
1/6/2025	Schlanger, Daniel A.	0.1	Settlement/Non-Binding ADR	Email to cocounsel regarding settlement issue.
1/27/2025	Schlanger, Daniel A.	1.5	Settlement/Non-Binding ADR	Review and propose revisions to settlement agreement

Date	Staff	Hours	Activity	Comments
1/31/2025	Schlanger, Daniel A.	1.4	Settlement/Non-Binding ADR	Review and provide feedback regarding settlement, long notice and short notice. .3; Review and call with co-c regarding letter to 9 carveouts. .5; Revise letter to 9 class members carved out from the settlement class. .6
3/4/2025	Schlanger, Daniel A.	0.2	Settlement/Non-Binding ADR	Review email to potential class administrator re getting a quote
4/12/2025	Schlanger, Daniel A.	0.5	Analysis/Strategy	Email to TMLG attorneys re specific legal arguments relevant to draft complaint and attaching supporting materials.
4/13/2025	Schlanger, Daniel A.	0.3	Analysis/Strategy	Emails with TMLG attorneys re legal strategy.
4/16/2025	Schlanger, Daniel A.	0.3	Settlement/Non-Binding ADR	Review opposing counsel's proposed edits to settlement agreement.
4/21/2025	Schlanger, Daniel A.	1.3	Settlement/Non-Binding ADR	Revising exhibit to settlement (letter); and emails with cocounsel regarding same regarding compromise language (1); zoom call with opposing counsel re settlement language (.3)
4/22/2025	Schlanger, Daniel A.	0.6	Settlement/Non-Binding ADR	Review revised draft of settlement agreement and email to cocounsel regarding potential changes.
4/23/2025	Schlanger, Daniel A.	0.4	Settlement/Non-Binding ADR	Emails with co-counsel re settlement related issues
4/25/2025	Schlanger, Daniel A.	0.2	Review/analyze	Review cocounsel emails re adjusting litigation schedule including experts, cutoff and class cert and responding with my position on same.
6/24/2025	Schlanger, Daniel A.	0.6	Analysis/Strategy	Call with Beth Terrell regarding preliminary approval hearing and all related issues.
6/26/2025	Schlanger, Daniel A.	2.7	Appear for/attend	Prepare for preliminary approval hearing (1.5 hrs); attend hearing (.6); emails with co-counsel and class administrator following hearing regarding next steps. (.6)
6/27/2025	Schlanger, Daniel A.	0.3	Settlement/Non-Binding ADR	Emails with co-counsel and class administrator regarding next steps.
7/2/2025	Schlanger, Daniel A.	1.5	Settlement/Non-Binding ADR	Zoom call with ALCS and cocounsel re class administration issues and reviewing emails throughout day re same and call to co-counsel re same.
7/3/2025	Schlanger, Daniel A.	0.2	Settlement/Non-Binding ADR	Reviewing ALCS emails to various class admin questions throughout the day
7/7/2025	Schlanger, Daniel A.	4.7	Draft/revise	Preparing adequacy declaration and supporting exhibits, including revisions to same throughout the day and supervising paralegal.
7/30/2025	Schlanger, Daniel A.	0.1	Review/analyze	Review court's order and emails with co-counsel and class administrator re same.

Date	Staff	Hours	Activity	Comments
7/31/2025	Schlanger, Daniel A.	1.0	Review/analyze	Review supplemental declaration and provide comments/proposed revisions to same and emails with cocounsel re same. (.6); call with ALCS re same (.4).
8/4/2025	Schlanger, Daniel A.	0.4	Settlement/Non-Binding ADR	Emails with class administrator and cocounsel re potential edits to supplemental declaration.
9/1/2025	Schlanger, Daniel A.	0.1	Review/analyze	Review ECF order granting preliminary approval.
3/3/2023	Go, Michael A.	2.0	Draft	Started Drafting Complaint
3/6/2023	Go, Michael A.	3.0	Draft	Continued Drafting Complaint and Asked Client for additional docs
7/14/2023	Frianeza, Grace	0.3	Confer	Reviewed communications, and emailed CoC for DAS PHV application
7/27/2023	Frianeza, Grace	1.0	Draft	PHV Application
8/15/2023	Frianeza, Grace	0.2	Paralegal staff work	Rename, save ECF (4)
8/21/2023	Frianeza, Grace	1.5	Calendaring/Scheduling	Calendar (20); Rename, Save ECF (9); Update Case Status
8/31/2023	Frianeza, Grace	0.3	Calendaring/Scheduling	Rename, save ECF (4); Add defendant; Add critical deadlines (5)
10/31/2023	Frianeza, Grace	0.5	Confer	review documents and calendar; edited tasks; send email update to to client
10/31/2023	Frianeza, Grace	0.3	Review	add local counsel details (2); review files and tasks
11/6/2023	Frianeza, Grace	0.3	Calendaring/Scheduling	rename, read, save ECF; add calendar (2)
11/7/2023	Frianeza, Grace	0.5	Confer	review SA; send client email update
11/21/2023	Frianeza, Grace	0.3	Document Production Related	access def's doc prod; send email; read emails
12/29/2023	Frianeza, Grace	1.0	Confer	draft email client update; review documents
1/23/2024	Frianeza, Grace	0.2	Calendaring/Scheduling	double check and edit calendar entries
1/29/2024	Frianeza, Grace	0.3	Review	review and sort forwarded emails
2/29/2024	Frianeza, Grace	1.0	ECF Filing Related	rename, read, save ECF (2); send update to client; review and sort emails; edited critical deadline
4/22/2024	Frianeza, Grace	0.3	Document Production Related	confer with OC re doc production; back and forth email to troubleshoot
5/14/2024	Mereria, Aldrin	0.6	Review	reviewed emails; confer with Dan; locating and compiling net worth documents in SA and Sharepoint;
5/22/2024	Mereria, Aldrin	0.3	Calendaring/Scheduling	modified calendar entries based on ECF 73
5/24/2024	Mereria, Aldrin	0.2	Review	reviewed and sorted ECF email; renamed and uploaded ECF No. 75; calendared deadline for submitting standalone joint letter
5/28/2024	Mereria, Aldrin	0.6	Document Production Related	accessed production documents from Terrell & Marshall; arranged and converted to PDF; uploaded in SA
5/29/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email from OC

Date	Staff	Hours	Activity	Comments
6/3/2024	Mereria, Aldrin	0.2	Review	reviewed email from OC and accessed production docs
6/4/2024	Mereria, Aldrin	0.3	Review	reviewed email; accessed unredacted production, merged and uploaded in SA
6/18/2024	Mereria, Aldrin	0.4	Review	reviewed and uploaded ECF No. 78; modified calendar entries
6/18/2024	Mereria, Aldrin	0.2	Review	reviewed email from CoC and uploaded discovery demands; updated SA notes
6/18/2024	Frianeza, Grace	0.1	Review	forward emails to AM
6/18/2024	Mereria, Aldrin	0.1	Review	reviewed ECF email and uploaded ECF No. 77 in SA
6/25/2024	Mereria, Aldrin	0.1	Review	case review
6/26/2024	Frianeza, Grace	0.1	Confer	forward emails to AM
6/27/2024	Mereria, Aldrin	0.3	Document Production Related	reviewed emails; uploaded initial disclosures; merged initial production docs.
7/11/2024	Mereria, Aldrin	0.1	Review	reviewed ECF and uploaded ECF 79 in SA
7/15/2024	Mereria, Aldrin	0.2	Calendar/Scheduling	reviewed and uploaded ECF; modified calendar entries
7/24/2024	Mereria, Aldrin	0.2	Review	reviewed email from OC; uploaded defendant's discovery responses and proposed protective order
7/29/2024	Mereria, Aldrin	0.6	Calendar/Scheduling	reviewed and uploaded ECF 82; modified calendar entries to reflect new schedule.
8/8/2024	Frianeza, Grace	1.5	Calendar/Scheduling	review and sort emails; rename, read, save ECFs; edit calendar scheduling order
8/12/2024	Mereria, Aldrin	0.3	Review	download document production; extracted and uploaded in SA; rename docs in SA
8/28/2024	Mereria, Aldrin	0.1	Review	replied to OC's paralegal and requested access to production
8/29/2024	Mereria, Aldrin	0.2	Document Production Related	access document production; merged, converted to PDF and uploaded in SA
9/5/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; uploaded discovery requests in SA
9/19/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted ECF 85; uploaded in SA
9/24/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; uploaded discovery responses
9/25/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; uploaded deposition notices and RFPs 2nd set
9/25/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; uploaded Conduent's RFA
10/1/2024	Mereria, Aldrin	0.3	Calendar/Scheduling	modified calendar entries to reflect ECF 86 changes
10/1/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted ECF email; uploaded ECF 86 in SA
10/8/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted emails
10/18/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted ECF; uploaded ECF 86-1, updated calendar
10/22/2024	Frazin, Alan	0.7	Draft	Draft DS Dec ISO Class Cert
10/23/2024	Montoya, Maria	3.6	Edit/Revise	Confer w DS - Edit DS Selected Consumer Litigation

Date	Staff	Hours	Activity	Comments
10/27/2024	Frazin, Alan	4.2	Document Production Related	Confer with DS, download and organize Defendants' production in preparation for mediation statement.
11/7/2024	Mereria, Aldrin	0.1	Review	reviewed email; merged and uploaded Sparkman II-192 to 203
11/12/2024	Mereria, Aldrin	0.3	Calendaring/Scheduling	reviewed email and uploaded deposition notices; calendared deposition schedule
11/13/2024	Mereria, Aldrin	0.4	Calendaring/Scheduling	reviewed email and sorted; uploaded deposition notices and calendared.
11/18/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; uploaded ECF 88
11/20/2024	Frazin, Alan	0.1	Prepare	Prepare DS Declaration ISO Class Cert
11/21/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; uploaded and calendared deposition of Carl Pry
11/22/2024	Mereria, Aldrin	0.1	Review	reviewed and sorted email; renamed and uploaded Conduent and Comerica's discovery response
11/27/2024	Mereria, Aldrin	0.4	Review	reviewed email and organized sharefile docs; uploaded in SA
12/30/2024	Mereria, Aldrin	0.4	Document Production Related	reviewed email; extracted and merge documents; uploaded in SA
1/3/2025	Mereria, Aldrin	0.4	Calendaring/Scheduling	reviewed and sorted ECF; uploaded ECF 100 and 101; made changes on the calendar
1/7/2025	Mereria, Aldrin	1.3	Document Production Related	reviewed documents production and deposition transcript; organized and uploaded in SA
2/12/2025	Mereria, Aldrin	0.2	Calendaring/Scheduling	reviewed and uploaded ECF 104; calendared case management and submissions due
2/27/2025	Mereria, Aldrin	0.2	Review	reviewed email and uploaded revised deposition notice; updated calendar entry
3/20/2025	Mereria, Aldrin	0.1	Calendaring/Scheduling	reviewed email and calendared deposition schedule of Carl Pry; uploaded notice
4/7/2025	Mereria, Aldrin	0.3	Calendaring/Scheduling	reviewed emails and updated calendar to add deposition Zoom link; calendared deposition of PL expert witness and uploaded notice
4/24/2025	Mereria, Aldrin	0.1	Review	reviewed and uploaded supplemental production
4/24/2025	Mereria, Aldrin	0.2	Review	reviewed and uploaded PI Objection and document production
4/25/2025	Mereria, Aldrin	0.1	Review	reviewed and uploaded ECF 60; deleted meet and confer 05/07
5/2/2025	Mereria, Aldrin	0.1	Review	review and upload ECF 61
7/18/2025	Montoya, Maria	0.7	ECF Filing Related	Review emails, save docs to SA and add info to calendared date

Date	Staff	Hours	Activity	Comments
Summary				
Team Member		Hours	Rate	Total
Daniel A. Schlanger		61.6	\$	725.00 \$ 44,660.00
Paralegals		35.0	\$	250.00 \$ 8,752.50
Total Time		96.6		\$ 53,412.50
Expenses				\$ 509.85
Totals				\$ 53,922.35