

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JACOB SILVER, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

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

Defendants.

Case No. 2:20-cv-02478-JS-AYS

**DECLARATION OF BETH E.
TERRELL IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

I, Beth E. Terrell, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC (Terrell Marshall), counsel of record for Plaintiff in this matter. I am admitted *pro hac vice* to practice before this Court and am a member in good standing of the bars of the states of Washington and California. I respectfully submit this declaration in support of Class Counsel's Unopposed Motion for Approval of Attorneys' Fees, Costs, and Service Award. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

A. Background and experience.

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

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

3. I am a founding member of Terrell Marshall. With over twenty years of experience, I concentrate my practice in complex litigation, including the prosecution of consumer protection, defective product, and wage and hour class actions. I have served as co-lead counsel on multi-state, multi-district, and nationwide class actions, resulting in hundreds of millions of dollars in settlements for consumers and workers. I also represent individual employees with wage and hour, workplace exposure, and discrimination claims. I have tried and won cases in state and federal courts and argued before the Washington State Court of Appeals and the Washington State Supreme Court as well as several federal circuit level courts. I served as the President of the Public Justice Foundation Board of Directors from July 2019 to July 2020, serve on the Equal Justice Works' Board of Counselors, and am the Chair of both the Northwest Consumer Law Center and the Washington Employment Lawyers Association. I am a member of the State Bar of California and the Washington State Bar Association. I serve as Co-Chair of PLI's Consumer Financial Services Institute, and frequently present on a wide variety of topics, including class actions, consumer protection, legal ethics, gender equity, and electronic discovery.

B. Qualifications of other Terrell Marshall attorneys and staff.

4. Adrienne D. McEntee became a member of Terrell Marshall in 2014. The core of Ms. McEntee's practice is complex litigation, including the prosecution of class actions on behalf of consumers, actions involving vulnerable adults, trusts and estates, and real estate and commercial disputes. Ms. McEntee has significant trial experience, having successfully tried commercial cases involving claims of breach of fiduciary duty, breach of contract, and breach of

easement. Ms. McEntee graduated from the University of Washington School of Law in 2003, where she was a member of the Pacific Rim Law and Policy Journal and Moot Court Honor Board. Before joining Terrell Marshall, Ms. McEntee was a member of Tousley Brain Stephens PLLC, where she practiced for five years. Before entering private practice, Ms. McEntee worked with the King County Prosecuting Attorney's Office, where she prosecuted a broad range of crimes. Ms. McEntee has tried approximately fifty cases and has briefed, argued, and won cases before the Washington State Court of Appeals. Since her admission to the bar, Ms. McEntee has been an active member of the Washington State Bar Association and Washington Women Lawyers, as a member of the Judicial Evaluation Committee. Ms. McEntee has been named on the Washington Super Lawyers list since 2018.

5. Ben Drachler joined Terrell Marshall as an associate in 2017. Mr. Drachler concentrates his practice on complex civil litigation, including the prosecution of consumer, defective product, and wage and hour class actions. Mr. Drachler also litigates complex disputes involving vulnerable adults and trusts and estates. Mr. Drachler received his J.D. from Seattle University, graduating magna cum laude in 2015. Before joining Terrell Marshall, Mr. Drachler served as law clerk to the Honorable Robert H. Whaley in the United States District Court for the Eastern District of Washington, and to the Honorable Thomas S. Zilly in the Western District of Washington.

6. Eden Nordby worked as a summer associate for Terrell Marshall in 2020 and joined the firm as an associate in 2021 after receiving her J.D. from the University of Washington. During law school Ms. Nordby served as Executive Managing Editor of the Washington Journal of Environmental Law and Policy. She received the WSBA Labor & Employment Section 2019 Summer Grant for her public service work and commitment to labor

and employment issues. Ms. Nordby is trained as a mediator and has successfully mediated a number of individual civil matters through the UW School of Law Mediation Clinic. Prior to law school, Ms. Nordby was a senior paralegal at Terrell Marshall from the time the firm opened in 2008 until starting law school in 2018.

7. Jodi Nuss is a paralegal at Terrell Marshall. She has worked at the firm since 2018. Ms. Nuss has more than 8 years of experience as a paralegal and is qualified to perform substantive legal work based on her training and experience.

8. Heather Brown is a paralegal at Terrell Marshall. Ms. Brown has worked at the firm since 2018 and has more than 19 years of experience in the legal field.

C. Other cases litigated by Terrell Marshall.

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

- a. *Solberg, et al. v. Victim Services, Inc., et al.*— Filed in 2014 on behalf of California consumers who received false, misleading, and deceptive debt collection letters printed on the letter head of county prosecuting attorneys. The Northern District of California granted final approval of the \$1.1 million settlement on August 23, 2021.
- b. *Carrillo v. Wells Fargo Bank, N.A.*—Filed in 2018 on behalf of borrowers who allege Wells Fargo charged them interest rates on residential loans that were higher than the rates disclosed in the bank's buydown agreements and closing disclosures. The Eastern District of New York granted Final Approval of a \$7 million settlement on August 19, 2021.
- c. *Gold, et al. v. Lumber Liquidators, Inc.*—Filed in 2014 on behalf of a class of consumers who purchased defective flooring. The Northern District of California granted final approval of the settlement, valued at up to \$30 million, on October 22, 2020.
- d. *Gambles et al. v. Sterling Infosystems, Inc.*—Filed in 2015 on behalf of a nationwide class of consumers who were affected by Sterling's inclusion of outdated adverse information on consumer reports. The Southern District of New York granted

final approval to a \$15 million class settlement on September 23, 2020.

- e. *Long v. First Resolution Investment Corp.*—Filed in 2018 on behalf of Washington consumers against whom a debt buyer and its collection agency law firm obtained judgments when the debt buyer was not licensed as a collection agency. The King County Superior Court granted final approval of a settlement providing over \$20 million in debt relief and \$600,000 on August 28, 2020.
- f. *Rosario v. Starbucks*—Filed in 2016 on behalf of job applicants who were affected by Starbucks' failure to provide notice before taking adverse action. On July 15, 2020, the Northern District of Georgia granted final approval of the settlement which provides class members up to \$8 million in benefits.
- g. *Miller v. P.S.C., Inc.*—Filed in 2017 on behalf of Washington consumers who alleged P.S.C. filed lawsuits against them using unlawful debt collection forms. The Western District of Washington granted final approval of a settlement that provided injunctive relief and \$1.52 million on January 10, 2020.
- h. *Dougherty v. Barrett Business Services, Inc.*—Filed in 2016 on behalf of job applicants who were affected by BBSI's failure to provide required disclosures before procuring criminal background reports. The Clark County Superior Court granted final approval of the \$1.5 million settlement on November 8, 2019.
- i. *Borecki v. Raymours Furniture Co., Inc.*—Filed in 2017 on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent. The Southern District of New York granted final approval of the \$4.25 million settlement on September 10, 2019.
- j. *Abante Rooter & Plumbing, Inc., et al. v. Alarm.com Inc., et al.*—Filed in 2015 on behalf of consumers who received solicitation calls on their cellular and residential telephones without their prior express consent. The Northern District of California granted final approval of the \$28 million settlement on August 15, 2019.
- k. *Leo v. Appfolio, Inc.*—Filed in 2017 on behalf of consumers who were affected by Appfolio's matching procedures that resulted in incorrect information being included on consumer reports and Appfolio's failure to provide consumers with required information about the sources any inaccuracies. The Western District of Washington granted final approval of the \$4.5 million settlement on July 18, 2019.

- l. *Snyder v. Ocwen Loan Servicing, LLC*—Filed in 2014 on behalf of consumers who received automated collection calls on their cellular telephones without their prior express consent. The Northern District of Illinois granted final approval of the \$21.5 million settlement on May 14, 2019.
- m. *Melito, et al. v. American Eagle Outfitters, Inc., et al.*—Filed in 2014 on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent. The Southern District of New York granted final approval to the \$14.5 million settlement on September 11, 2017, which the Second Circuit affirmed on April 30, 2019.
- n. *Abante Rooter & Plumbing, Inc. v. Pivotal Payments Inc.*—Filed in 2016 on behalf of consumers that received automated solicitation telephone calls to their cell phones without their prior express consent. The Northern District of California granted final approval of the \$9 million settlement on October 15, 2018.
- o. *Bowen v. CSO Financial, Inc., et al.*—Filed in 2017 on behalf of consumers in Washington who received unfair and deceptive debt collection notices that included threats of criminal prosecution. The Western District of Washington granted final approval of a settlement that provided injunctive relief and \$345,000 on July 10, 2018.
- p. *Terrell v. Costco Wholesale Corp.*—Filed in 2016 on behalf of applicants and employees who were affected by Costco’s failure to provide required disclosures before procuring criminal background reports. The King County Superior Court granted final approval of the \$2.49 million settlement on June 15, 2018.
- q. *In re Monitronics International, Inc. Telephone Consumer Protection Act Litigation*—Filed in 2011 on behalf consumers who received automated, prerecorded solicitation calls on their residential and telephones without their prior express consent. Terrell Marshall served as co-lead counsel in the multidistrict litigation. The Northern District of West Virginia granted final approval of the \$28 million settlement on June 12, 2018.
- r. *Dibb, et al. v. AllianceOne Receivables Management, Inc.*—Filed in 2014 on behalf of Washington consumers who received unfair and deceptive debt collection notices that included threats of criminal prosecution. The Western District of Washington granted final approval of the \$1.9 million settlement on July 31, 2017.
- s. *Booth v. Appstack, Inc.*—Filed in 2013 on behalf of small businesses that received prerecorded calls using an automatic

dialing system on cellular telephone lines without their prior consent. The court certified the class, denied a motion to decertify, denied the defendants' motion for summary judgment and granted partial summary judgment for the class. The case settled on the eve of trial and the court granted final approval of the \$975,000 settlement on January 11, 2017.

- t. *Cavnar, et al. v. BounceBack, Inc.*—Filed in 2014 on behalf of Washington consumers who received false, misleading, and deceptive debt collection letters printed on the letterhead of county prosecuting attorneys. The Eastern District of Washington granted final approval of the \$530,000 settlement on September 15, 2016.
- u. *Wilkins, et al. v. HSBC Bank Nevada, N.A., et al.*—Filed in 2014 on behalf of individuals who received prerecorded calls using an automatic dialing system without their prior consent. The Northern District of Illinois granted final approval of the \$39.9 million settlement on March 17, 2015.
- v. *In re Capital One Telephone Consumer Protection Act Litigation*—Filed in 2012 on behalf of consumers who received automated, prerecorded collection calls on their cellular telephones without their prior express consent. Terrell Marshall served as co-lead counsel in the multidistrict litigation. The Northern District of Illinois granted final approval of the \$75 million settlement on February 23, 2015.

10. Additional information about class actions litigated by Terrell Marshall is available on our website www.terrellmarshall.com.

D. The prosecution and settlement of this action.

11. My firm filed this case knowing the outcome was far from certain. One of the major risks Plaintiff faced in this litigation was related to damages. The cost of the service was low, just \$2.95 a month plus taxes, and while Defendants have a significant number of customers, the number of affected subscribers was unknown.

12. The damages risks were borne out in litigation: fewer than 5,000 of Defendants' customers were affected. After this case was filed, Defendants issued two sets of refunds to Plaintiff and Settlement Class Members. Defendants argued that the refunds moot Plaintiff's

claims and that the Settlement Class cannot prevail on a breach of contract claim because they cannot establish damages. We are confident that we would have defeated both arguments, but if Defendants had prevailed, Plaintiff and the Settlement Class would not have received any relief.

13. Plaintiff also risked losing at class certification. Defendants insisted throughout the litigation that individualized issues among class members would preclude certification. Plaintiff disagrees because the claims in this action involve a single service governed by standardized contracts, but if the Court agreed with Defendants it may have declined to certify a class. Even if a class were eventually certified, and Plaintiff succeeded in bringing the case to verdict, Defendants likely would have appealed.

14. After early efforts to resolve the case were unsuccessful, including a formal settlement conference before Judge Shields, my firm, together with our co-counsel at Schlanger Law, actively and thoroughly litigated this case into July 2021. In the declaration I submitted in support of preliminary approval, ECF No. 47, I describe in detail the work we did to obtain from Defendants the data and documents we needed to establish liability, calculate damages, and position the case for a successful mediation and settlement. These tasks included propounding multiple sets of written discovery requests; reviewing thousands of pages of documents; meeting and conferring extensively about Defendants' objections and the scope of data that would be produced; and analyzing tens of thousands of rows of account-level billing and refund data to establish damages. My firm and our co-counsel spent many hours of time and effort reviewing and analyzing this data and requesting additional information before calculating class member damages.

15. As a result of our discovery efforts and motion practice, by the time the parties commenced settlement negotiations, we understood the strengths and weaknesses of the claims

and defenses in this case, and had a detailed analysis of the size of the proposed Classes and the extent of class-wide damages. The parties mediated with Richard Byrne of National Arbitration and Mediation on September 30, 2021, and after hours of discussion reached a settlement in principle. After more than a month of follow up negotiations, the parties reached agreement regarding the scope of the Settlement Class, and on all other material terms.

C. Terrell Marshall's lodestar.

16. Terrell Marshall has worked on this case with no guarantee of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always been contingent on successfully obtaining relief for Mr. Silver and class members. As a result, there was a substantial risk of non-payment, particularly in light of the challenges inherent in this type of case. Work on this case has necessarily been to the exclusion of work on other matters that likely would have generated fees, including several class actions. Terrell Marshall has also been denied use of the fees it earned over the course of this case.

17. The work performed by paralegals and legal assistants was work that I or another attorney would have had to perform absent such assistance. This work required an understanding of legal concepts and rules was important to the development of the facts and claims and the presentation of evidence at trial. Each of the paralegals and legal assistants who worked on this case is qualified to perform substantive legal work based on training and experience.

18. A compilation of the contemporaneously maintained billing records of Terrell Marshall attorneys and staff is attached as **Exhibit 1**. I have reviewed these billing records and reduced and eliminated time where appropriate. I eliminated all time entries for certain timekeepers, including legal assistants and work performed by time keepers who spent fewer than four hours on the case, and removed attorney time that was administrative in nature. The

reductions I have made are shown in red in the columns on the right hand side of Exhibit 1. It is my firm belief that the remainder of the time billed was reasonably necessary to litigate this case and secure a settlement on behalf of Mr. Silver and class members.

19. The lodestar identified in this section includes time spent on the case from the outset of our involvement through April 19, 2022.

20. The lodestar calculations of plaintiff's counsel are based on reasonable hourly rates. Terrell Marshall set the rates for attorneys and staff based on a variety of factors, including among others: the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets where legal services are typically performed; and the experience, reputation and ability of the attorneys and staff. The rates identified below are lower than the rates Terrell Marshall charges in national class actions. My current "national" rate, for example, is \$775 per hour. However, I acknowledge that rates must reflect the rates charged in the local jurisdiction. Accordingly, I have adjusted my rate and the rates of others in the firm accordingly.

21. The following table identifies the attorneys and staff from Terrell Marshall who worked on this case and for whom the recovery of fees is sought. For each of the timekeepers below I have stated the current hourly rate, the number of hours worked on this case through April 15, 2021, and the total amount of fees. These time summaries are taken from contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the regular course of business.

Professional	Role	Rate	Hours	Lodestar
Beth E. Terrell	Partner	\$650	12.5	\$8,125.00
Adrienne McEntee	Partner	\$600	36.2	\$21,720.00

Professional	Role	Rate	Hours	Lodestar
Ben Drachler	Associate	\$400	330.9	\$132,360.00
Eden Nordby	Law Clerk	\$300	4.2	\$1,365.00
Jodi Nuss	Paralegal	\$200	35.1	\$7,020.00
Heather Brown	Paralegal	\$200	4.1	\$820.00
TOTALS			423	\$171,410.00

22. The hours my firm dedicated to this case were important and necessary. We diligently pursued documents and data from Defendants, reviewed thousands of pages of documents, and conducted an exhaustive analysis of account-level billing and refund data for more than ten thousand accounts.

23. The data analysis was complex. Defendants produced an array of interrelated spreadsheets containing data stored in different formats across multiple systems, which made the data more difficult to reconcile. Terrell Marshall's senior paralegal, Jodi Nuss, dedicated numerous hours to synthesizing and conducting a detailed analysis of this data. And Class Counsel spent significant time and effort reviewing the analysis to identify Settlement Class Members, determine the strength of their claims, and calculate their damages.

D. Terrell Marshall's litigation expenses.

24. Terrell Marshall has incurred out-of-pocket litigation costs totaling \$3,283.26, primarily to cover expenses for mediation and filing fees. The following chart summarizes Terrell Marshall's litigation costs:

Category of Expense	Total
Filing fees	\$310.00
Mediation fees	\$2,885.00

Category of Expense	Total
Westlaw	\$88.26
TOTAL	\$3,283.26

G. Future work to be performed.

25. The time described above does not include time that our firm will spend drafting the final approval motion, preparing for the final approval hearing, responding to any Settlement Class Member objections or inquiries, and supervising the settlement administrator's distribution of the Settlement Fund.

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

Executed in Seattle, Washington this 25th day of April, 2022.

By: /s/ Beth E. Terrell, Admitted Pro Hac Vice
Beth E. Terrell, *Admitted Pro Hac Vice*

Attorneys for Plaintiff

— EXHIBIT 1 —

Terrell Marshall Law Group PLLC
Silver v. LiveWatch Security, LLC and Monitronics International, Inc.
Matter 2385-001

Date	Initials	Narrative	Units	Rate	Value	Write-Off
Statement Professional: Adrienne McEntee						
9/15/2021	ADM	Reviewed file.	0.6	\$ 600.00	\$ 360.00	
9/24/2021	ADM	Reviewed mediation statement and exhibits.	0.2	\$ 600.00	\$ 120.00	
9/27/2021	ADM	Reviewed and revised mediation letter; internal calls regarding the same.	1.6	\$ 600.00	\$ 960.00	
9/30/2021	ADM	Participated in mediation; drafted term sheet.	7.1	\$ 600.00	\$ 4,260.00	
10/1/2021	ADM	Finalized term sheet; emailed the same to opposing counsel and mediator; reviewed class administrator's proposal; worked on postcard and long form notice.	0.9	\$ 600.00	\$ 540.00	
10/4/2021	ADM	Emailed opposing counsel regarding status of term sheet.	0.3	\$ 600.00	\$ 180.00	
10/5/2021	ADM	Reviewed revised letter; call with co-counsel and Jodi regarding class size; finalized status letter; call with opposing counsel.	0.6	\$ 600.00	\$ 360.00	
10/6/2021	ADM	Internal emails regarding data.	0.2	\$ 600.00	\$ 120.00	
10/11/2021	ADM	Drafted email to opposing counsel regarding number of class members and term sheet; revised term sheet; reviewed spreadsheets supporting the same.	0.6	\$ 600.00	\$ 360.00	
10/13/2021	ADM	Emails to and from opposing counsel and to and from co-counsel regarding term sheet and letter to the court.	0.2	\$ 600.00	\$ 120.00	
10/15/2021	ADM	Reviewed final term sheet; drafted letter advising court of signed term sheet.	0.3	\$ 600.00	\$ 180.00	
10/16/2021	ADM	Email from co-counsel with revisions to joint letter.	0.2	\$ 600.00	\$ 120.00	
11/8/2021	ADM	Emailed co-counsel regarding status of Livewatch settlement agreement and motion for preliminary approval.	0.2	\$ 600.00	\$ 120.00	
11/14/2021	ADM	Internal emails regarding settlement agreement; emails to and from co-counsel regarding the same.	0.2	\$ 600.00	\$ 120.00	
11/15/2021	ADM	Worked on settlement agreement and proposed orders and notices.	5.2	\$ 600.00	\$ 3,120.00	
11/16/2021	ADM	Reviewed motion for preliminary approval.	0.6	\$ 600.00	\$ 360.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
11/17/2021	ADM	Reviewed letter seeking extension of time to move for preliminary approval; emails to and from co-counsel regarding the same.	0.3	\$ 600.00	\$ 180.00	
11/18/2021	ADM	Reviewed revisions to settlement agreement.	0.2	\$ 600.00	\$ 120.00	
11/22/2021	ADM	Reviewed revised notice documents.	0.2	\$ 600.00	\$ 120.00	
11/29/2021	ADM	Worked on damages issues.	0.2	\$ 600.00	\$ 120.00	
11/30/2021	ADM	Reviewed redlines to settlement agreement exhibits; call with co-counsel regarding the same.	0.2	\$ 600.00	\$ 120.00	
12/1/2021	ADM	Worked on settlement agreement exhibits; emailed co-counsel regarding the same; emailed opposing counsel regarding the same.	1.1	\$ 600.00	\$ 660.00	
12/6/2021	ADM	Reviewed opposing counsel's revisions to settlement agreement; internal emails regarding the same; researched taxation issues.	1.6	\$ 600.00	\$ 960.00	
12/8/2021	ADM	Reviewed co-counsel's revisions to the settlement agreement; emails to and from the same; emailed opposing counsel regarding the same.	0.4	\$ 600.00	\$ 240.00	
12/9/2021	ADM	Call with opposing counsel regarding changes to the settlement agreement.	0.9	\$ 600.00	\$ 540.00	
12/10/2021	ADM	Internal emails regarding preliminary approval motion and exhibits; reviewed exhibits.	0.2	\$ 600.00	\$ 120.00	
12/12/2021	ADM	Reviewed revised motion for preliminary approval.	0.7	\$ 600.00	\$ 420.00	
12/13/2021	ADM	Email from co-counsel with changes to settlement agreement exhibits.	0.3	\$ 600.00	\$ 180.00	
12/14/2021	ADM	Reviewed revisions to settlement agreement.	0.5	\$ 600.00	\$ 300.00	
12/16/2021	ADM	Reviewed motion letter to extend preliminary approval deadline; emails to and from co-counsel regarding the same.	0.2	\$ 600.00	\$ 120.00	
12/27/2021	ADM	Call with co-counsel regarding settlement agreement and motion for preliminary approval; emailed opposing counsel regarding the same; reviewed defendants' affidavit regarding class list.	0.2	\$ 600.00	\$ 120.00	
12/28/2021	ADM	Emails to and from co-counsel regarding settlement agreement, exhibits, and motion for preliminary approval.	0.2	\$ 600.00	\$ 120.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
12/29/2021	ADM	Reviewed revisions to settlement agreement; reviewed revisions to exhibits; revised list of Settlement Class Members who did not receive refunds; emails to and from opposing counsel regarding the same.	0.7	\$ 600.00	\$ 420.00	
1/3/2022	ADM	Emailed opposing counsel regarding affidavit status; internal emails regarding the same.	0.2	\$ 600.00	\$ 120.00	
1/4/2022	ADM	Revised settlement agreement; emails to and from opposing counsel regarding the same; revised affidavit; finalized exhibits.	1	\$ 600.00	\$ 600.00	
1/5/2022	ADM	Emails to and from opposing counsel regarding settlement.	0.2	\$ 600.00	\$ 120.00	
1/6/2022	ADM	Emailed co-counsel regarding anti-disparagement clause; call with co-counsel regarding the same; emailed opposing counsel regarding the same.	0.7	\$ 600.00	\$ 420.00	
1/7/2022	ADM	Reviewed revisions to motion for preliminary approval; reviewed proposed client declaration; call with opposing counsel; call with co-counsel; emails to and from client	1.4	\$ 600.00	\$ 840.00	
1/9/2022	ADM	Worked on motion for preliminary approval; emailed co-counsel regarding the same.	0.4	\$ 600.00	\$ 240.00	
1/10/2022	ADM	Worked on motion for preliminary approval.	2.6	\$ 600.00	\$ 1,560.00	
1/11/2022	ADM	Reviewed revisions from co-counsel to motion for p	0.2	\$ 600.00	\$ 120.00	
1/14/2022	ADM	Internal call regarding fee petition; emails regarding the same.	0.2	\$ 600.00	\$ 120.00	
1/18/2022	ADM	Internal emails regarding fee petition and class list.	0.3	\$ 600.00	\$ 180.00	
2/2/2022	ADM	Reviewed updated bid from administrator; reviewed CAFA documents.	0.4	\$ 600.00	\$ 240.00	
2/11/2022	ADM	Email from claims administrator regarding issue of possible duplicate class members; email from opposing counsel regarding the same.	0.2	\$ 600.00	\$ 120.00	
3/3/2022	ADM	Reviewed postcard, IVR, and email notice.	0.1	\$ 600.00	\$ 60.00	
3/7/2022	ADM	Reviewed postcard, IVR, and email notice.	0.4	\$ 600.00	\$ 240.00	
4/11/2022	ADM	Reviewed and revised draft fee petition and supporting documents.	0.6	\$ 600.00	\$ 360.00	
4/19/2022	ADM	Reviewed co-counsel's revisions to motion for fees and costs.	0.2	\$ 600.00	\$ 120.00	
Statement Professional: Adrienne McEntee					\$ 21,720.00	

Statement Professional: Ana Amezaga

Date	Initials	Narrative	Units	Rate	Value	Write-Off
3/25/2022	AA	Worked on motion for attorneys fees, memorandum and declarations. Statement Professional: Ana Amezaga	2	\$ 125.00	\$ 250.00	\$ 250.00
Statement Professional: Beth Terrell						
3/17/2020	BET	Emails with Mr. Schlanger regarding potential new case; analyzed facts and applicable law regarding same.	0.3	\$ 650.00	\$ 195.00	
5/20/2020	BET	Emails from and to Mr. Schlanger regarding class definition, claims, and timing of filing.	0.3	\$ 650.00	\$ 195.00	
5/22/2020	BET	Analyzed applicable contract language re indemnity; pulled similar complaint and sent to Mr. Schlanger.	0.2	\$ 650.00	\$ 130.00	
5/27/2020	BET	Analyzed legal claims.	0.2	\$ 650.00	\$ 130.00	
5/28/2020	BET	Worked on complaint.	0.2	\$ 650.00	\$ 130.00	
6/2/2020	BET	Worked on complaint and ancillary documents.	0.4	\$ 650.00	\$ 260.00	
6/17/2020	BET	Analyzed change in contract language.	0.2	\$ 650.00	\$ 130.00	
7/7/2020	BET	Analyzed crediting of client's money re potential mootness, Telephone conference with co-counsel regarding potential mootness issues and next steps.	0.2	\$ 650.00	\$ 130.00	
7/8/2020	BET		0.4	\$ 650.00	\$ 260.00	
7/14/2020	BET		0.4	\$ 650.00	\$ 260.00	
7/15/2020	BET	Attended settlement conference; emails with co-counsel regarding same.	0.6	\$ 650.00	\$ 390.00	
7/24/2020	BET	Emails with co-counsel and opposing counsel regarding settlement issues and potential mediators.	0.3	\$ 650.00	\$ 195.00	
7/27/2020	BET	Analyzed settlement issues; considered potential mediators.	0.2	\$ 650.00	\$ 130.00	
8/26/2020	BET	Prepared for and attended telephone conference with co-counsel re settlement and substantive issues.	0.4	\$ 650.00	\$ 260.00	
9/1/2020	BET	Analyzed early discovery needed for settlement purposes.	0.3	\$ 650.00	\$ 195.00	
9/25/2020	BET	Worked on rule 26 issues and schedule; emails with Mr. Schlanger regarding same.	0.4	\$ 650.00	\$ 260.00	
10/30/2020	BET	Analyzed amendment issues; emails with co-counsel regarding same.	0.3	\$ 650.00	\$ 195.00	
11/3/2020	BET	Worked on discovery and amendment issues.	0.5	\$ 650.00	\$ 325.00	
11/5/2020	BET	Worked on discovery, amendment, and settlement issues; emails with co-counsel regarding same.	0.4	\$ 650.00	\$ 260.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
11/18/2020	BET	Prepared for and attended settlement conference; telephone conference with co-counsel regarding same.	2.2	\$ 650.00	\$ 1,430.00	
12/4/2020	BET	Revised pre-motion letter.	0.3	\$ 650.00	\$ 195.00	
1/15/2021	BET	Worked on amended complaint and motion to amend; emails with co-counsel regarding same.	0.4	\$ 650.00	\$ 260.00	
1/26/2021	BET	Worked on meet and confer letter; emails with co-counsel regarding same.	0.4	\$ 650.00	\$ 260.00	
7/9/2021	BET	Worked on mediator selection.	0.3	\$ 650.00	\$ 195.00	
7/15/2021	BET	Analyzed status of pre-mediation discovery and follow-up regarding same.	0.3	\$ 650.00	\$ 195.00	
8/11/2021	BET	Worked on mediator selection; emails with co-counsel.	0.2	\$ 650.00	\$ 130.00	
9/30/2021	BET	Attended mediation; follow-up with co-counsel after same.	2.2	\$ 650.00	\$ 1,430.00	
Statement Professional: Beth Terrell					\$	8,125.00
Statement Professional: Ben Drachler						
6/8/2020	BMD	Worked on case management [.5]; reviewed and analyzed local rules regarding filing and appearances [.2]; email correspondence regarding motions to appear PHV [.2].	0.9	\$ 400.00	\$ 360.00	
6/17/2020	BMD	Email correspondence regarding draft discovery, initial disclosures, and protective order [.2]; reviewed case documents and revised protective order and initial disclosures [1.5];	1.7	\$ 400.00	\$ 680.00	
6/23/2020	BMD	Conducted research and worked on discovery requests [6.1]; reviewed client documents [.4] completed discovery requests [1.9].	8.4	\$ 400.00	\$ 3,360.00	
6/24/2020	BMD	Worked on discovery requests [3.8].	3.8	\$ 400.00	\$ 1,520.00	
6/30/2020	BMD	Reviewed stipulation and draft letter to judge [.2]; email correspondence regarding same [.1].	0.3	\$ 400.00	\$ 120.00	
7/8/2020	BMD	Prepared for and participated in telephone conference regarding case strategy [.7].	0.7	\$ 400.00	\$ 280.00	
7/13/2020	BMD	Revised memo regarding catalyst fees [.4]; email correspondence regarding same [.1].	0.5	\$ 400.00	\$ 200.00	
7/14/2020	BMD	Email correspondence regarding conference with opposing counsel [.1].	0.1	\$ 400.00	\$ 40.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
7/15/2020	BMD	Prepared for and participated in telephone conference regarding potential settlement [.6]; follow up regarding same [.2].	0.8	\$ 400.00	\$ 320.00	
7/24/2020	BMD	Email correspondence regarding early JAMS mediation [.1].	0.1	\$ 400.00	\$ 40.00	
7/31/2020	BMD	Telephone conference regarding potential settlement [.3].	0.3	\$ 400.00	\$ 120.00	
8/18/2020	BMD	Reviewed and analyzed confidentiality agreement [.2]; Email correspondence regarding potential mediators [.2]	0.4	\$ 400.00	\$ 160.00	
8/19/2020	BMD	Reviewed local rules and prepared stipulation to extend time to answer [.4]; reviewed document production [.2].	0.6	\$ 400.00	\$ 240.00	
9/11/2020	BMD	Prepared for and participated in telephone conference with opposing counsel regarding settlement [.9].	0.9	\$ 400.00	\$ 360.00	
9/16/2020	BMD	Analyzed issues regarding case deadlines and expected length of discovery [.5]; email correspondence regarding same [.2]; email correspondence regarding potential amendment to complaint and structure for settlement conference with Judge Shields [.2].	0.9	\$ 400.00	\$ 360.00	
9/25/2020	BMD	Email correspondence regarding proposed schedule and settlement conference [.2]; reviewed and analyzed draft schedule [.1].	0.3	\$ 400.00	\$ 120.00	
10/2/2020	BMD	Email correspondence regarding discovery schedule [.1]; correspondence regarding proposed revisions [.1].	0.2	\$ 400.00	\$ 80.00	
10/6/2020	BMD	Reviewed and analyzed defendants' initial disclosures [.2]; follow up regarding same [.1]; reviewed case file and analyzed issues regarding witness disclosures [.4]; drafted initial disclosures and revised and finalized [3.2]; email correspondence regarding same [.1].	4	\$ 400.00	\$ 1,600.00	
10/7/2020	BMD	Analyzed issues regarding tier 1 discovery [.2]; email correspondence regarding same [.1].	0.3	\$ 400.00	\$ 120.00	
10/15/2020	BMD	Analyzed issues regarding tier 1 discovery [.2]; reviewed draft letter and email correspondence regarding same [.1].	0.3	\$ 400.00	\$ 120.00	
10/19/2020	BMD	Reviewed PHV application [.1].	0.1	\$ 400.00	\$ 40.00	
10/26/2020	BMD	Worked on case management [.2]; email correspondence with opposing counsel regarding t1 discovery [.1].	0.3	\$ 400.00	\$ 120.00	
10/30/2020	BMD	Email correspondence regarding data production [.1]; reviewed and analyzed data produced by defendant and prepared analysis of deficiencies [2.2].	2.3	\$ 400.00	\$ 920.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
11/2/2020	BMD	Worked on case management [.3]; email correspondence regarding deadlines [.1]; reviewed and analyzed Judge Shield's settlement conference rules and analyzed issues regarding data and submissions [1.2]; email correspondence regarding same [.1].	1.7	\$ 400.00	\$ 680.00	
11/3/2020	BMD	Reviewed email correspondence regarding amendment and demand and analyzed issues regarding same [.2];	0.2	\$ 400.00	\$ 80.00	
11/5/2020	BMD	Analyzed issues regarding amendment [.1]; email correspondence regarding same [.1]; drafted settlement letter [2.3]; email correspondence regarding same [.1].	2.6	\$ 400.00	\$ 1,040.00	
11/6/2020	BMD	Reviewed and analyzed proposed revisions to settlement letter and made further revisions [.5]; email correspondence regarding same [.1]; telephone conference regarding proposed settlement structure [.3]; revised and finalized settlement letter [.2]; worked on First Amended Complaint [2.3].	3.4	\$ 400.00	\$ 1,360.00	
11/9/2020	BMD	Worked on First Amended Complaint [1.4]; drafted motion to amend and memorandum of law [5.1].	6.5	\$ 400.00	\$ 2,600.00	
11/11/2020	BMD	Revised draft First Amended Complaint and motion to amend [.6]; email correspondence regarding same [.1]; reviewed and analyzed Judge Shields' settlement conference rules and drafted settlement statement [3.2].	3.9	\$ 400.00	\$ 1,560.00	
11/16/2020	BMD	Email correspondence regarding response to Defendant's pre-motion conference letter [.1].	0.1	\$ 400.00	\$ 40.00	
11/17/2020	BMD	Prepared draft pre conference letter regarding motion to amend complaint [.8]; reviewed settlement communications and document productions in advance of settlement conference [.6]; email correspondence regarding same [.1].	1.5	\$ 400.00	\$ 600.00	
11/19/2020	BMD	Analyzed issues regarding response to pre-motion conference letters [.3]; email correspondence regarding same [.1]; analyzed issues regarding Judge Komitee's individual rules for contact with chambers [.2]; email correspondence regarding same [.1]; telephone call with Judge Komitee's case manager [.2]; email correspondence regarding same [.1].	1	\$ 400.00	\$ 400.00	
12/3/2020	BMD	Revised draft pre motion conference letter [.6]; revised draft memorandum of law [.5]; .	1.1	\$ 400.00	\$ 440.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
12/4/2020	BMD	Revised and finalized pre motion conference letter regarding motion to amend [.4]; email correspondence regarding same [.1]	0.5	\$ 400.00	\$ 200.00	
12/17/2020	BMD	Analyzed issues regarding deadlines and court orders [.5]; email correspondence regarding same [.1]; drafted tier one discovery requests [3.9].	4.5	\$ 400.00	\$ 1,800.00	
12/18/2020	BMD	Revised draft discovery requests [1.8].	1.8	\$ 400.00	\$ 720.00	
12/21/2020	BMD	Revised draft tier one discovery requests [1]; email correspondence regarding same [.1].	1.1	\$ 400.00	\$ 440.00	
12/22/2020	BMD	Email correspondence regarding proposed briefing schedule [.1].	0.1	\$ 400.00	\$ 40.00	
12/28/2020	BMD	Worked on case management [.2]; email correspondence regarding briefing schedule on motion to amend [.2]; prepared letter to Judge Shields proposing briefing schedule [.2]; analyzed issues regarding filing of letter motions [.2]; follow up regarding same [.1]; email correspondence with opposing counsel regarding proposed schedule and draft letter [.1]; reviewed and finalized letter for filing [.1].	1.1	\$ 400.00	\$ 440.00	
1/13/2021	BMD	Worked on Motion to amend [11.5].	11.5	\$ 400.00	\$ 4,600.00	
1/14/2021	BMD	Revised motion to amend [.5].	0.5	\$ 400.00	\$ 200.00	
1/15/2021	BMD	Reviewed and revised motion to amend and supporting documents and finalized [3.2]; telephone conference regarding same [.3].	3.5	\$ 400.00	\$ 1,400.00	
1/21/2021	BMD	Analyzed issues regarding discovery objection requirements [.2]; email correspondence regarding meet and confer letter [.1].	0.3	\$ 400.00	\$ 120.00	
1/25/2021	BMD	Worked on case and file management [.2].	0.2	\$ 400.00	\$ 80.00	
1/26/2021	BMD	Research and revised meet and confer letter [2.5]; worked on case management [.2]; email correspondence regarding defendants' production of additional data [.2]; reviewed and analyzed Defendants' Tier One discovery responses [.3].	3.2	\$ 400.00	\$ 1,280.00	
1/27/2021	BMD	Reviewed new data production [.6]; email correspondence regarding same [.1]; follow up regarding data [.4].	1.1	\$ 400.00	\$ 440.00	
1/28/2021	BMD	Reviewed data productions and discovery correspondence and prepared discovery deficiency memo [2.5].	2.5	\$ 400.00	\$ 1,000.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
1/29/2021	BMD	Reviewed local rules and analyzed issues defendants opposition to Plaintiff's motion to amend [.4]; email correspondence regarding same [.1].	0.5	\$ 400.00	\$ 200.00	
2/1/2021	BMD	Email correspondence regarding meet and confer [.1].	0.1	\$ 400.00	\$ 40.00	
2/2/2021	BMD	Prepared for and conducted meet and confer regarding tier 1 discovery [2.5]; data analysis [1.8]; drafted follow up meet and confer letter [6.3]; worked on ESI protocol [.5]; worked on confidentiality order [.3].	11.4	\$ 400.00	\$ 4,560.00	
2/3/2021	BMD	Drafted reply in support of Plaintiff's motion to amend [1]; email correspondence regarding same [.1].	1.1	\$ 400.00	\$ 440.00	
2/4/2021	BMD	Revised draft reply in support of plaintiff's motion for leave to amend [.2]; prepared status letter to Judge Shields [.6].	0.8	\$ 400.00	\$ 320.00	
2/8/2021	BMD	Worked on case and deadline management [.3]; email correspondence regarding status letter to court [.1]; finalized status letter [.2].	0.6	\$ 400.00	\$ 240.00	
2/24/2021	BMD	Reviewed document production, discovery responses and correspondence, and worked on discovery issues and summary [3.3].	3.3	\$ 400.00	\$ 1,320.00	
2/26/2021	BMD	Worked on case management and reviewed and analyzed discovery status [.9]; email correspondence regarding discovery follow up [.2]; email correspondence with Mr. Richards regarding Defendants' Tier one production [.1]; finalized first amended class action complaint [.2].	1.4	\$ 400.00	\$ 560.00	
3/3/2021	BMD	Worked on case management [.3]; analyzed issues regarding outstanding and identified issues for additional requests [1.2]; prepared for and conducted telephone conference regarding discovery, case strategy, and task assignments [1.6].	3.1	\$ 400.00	\$ 1,240.00	
3/4/2021	BMD	Reviewed and analyzed draft joint letter for adjournment [.1]; email correspondence regarding same [.1]; reviewed documents and worked on discovery issues [2.2]; telephone conference regarding same [.4]; follow up regarding same [.2].	3	\$ 400.00	\$ 1,200.00	
3/5/2021	BMD	Reviewed and analyzed stip ESI protocol and letter regarding February 3 meet and confer [.5]; email correspondence regarding same [.1].	0.6	\$ 400.00	\$ 240.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
3/17/2021	BMD	Worked on discovery issues, revised ESI Protocol [2.6].	2.6	\$ 400.00	\$ 1,040.00	
3/18/2021	BMD	Reviewed joint status letter [.1]; email correspondence regarding same [.1]; reviewed ESI protocol [.1]; email correspondence with opposing counsel regarding same [.1]; worked on discovery issues [.8].	1.2	\$ 400.00	\$ 480.00	
3/30/2021	BMD	Reviewed case email correspondence [.4]; reviewed case file and deadlines and worked on case management [.5]	0.9	\$ 400.00	\$ 360.00	
3/31/2021	BMD	Revised ESI protocol, email correspondence regarding same [.2]; worked on discovery issues [1.1]; email correspondence regarding hearing [.2]; telephone conference regarding discovery [.7].	2.2	\$ 400.00	\$ 880.00	
4/1/2021	BMD	Reviewed and analyzed defendant's proposed search terms and proposed revisions [.3]; email correspondence regarding same [.1]; telephone conference regarding search terms [.4]; worked on search terms [2.5]; follow up regarding same [.2]; telephone conference regarding case strategy [.7];	4.2	\$ 400.00	\$ 1,680.00	
4/2/2021	BMD	Drafted letter to opposing counsel regarding discovery issues [3.3] revised and finalized same [.4].	3.7	\$ 400.00	\$ 1,480.00	
4/9/2021	BMD	Drafted ESI disclosures and revised and finalized same [1]; email correspondence regarding same [.2].	1.2	\$ 400.00	\$ 480.00	
4/12/2021	BMD	Worked on case management [.3]; email correspondence regarding meet and confer [.1].	0.4	\$ 400.00	\$ 160.00	
4/13/2021	BMD	Prepared for and conducted telephone conference regarding discovery and refund emails and vendor [2].	2	\$ 400.00	\$ 800.00	
4/21/2021	BMD	Worked on case management [.2]; email correspondence regarding discovery schedule [.1].	0.3	\$ 400.00	\$ 120.00	
4/22/2021	BMD	Reviewed and analyzed Verett Affidavit [1.2]; email correspondence regarding same [.2].	1.4	\$ 400.00	\$ 560.00	
4/23/2021	BMD	Worked on case management [.2]; reviewed and analyzed customer data [.5]; telephone conference regarding discovery deficiencies, spoliation, and outstanding discovery [1.2].	1.9	\$ 400.00	\$ 760.00	
4/26/2021	BMD	Reviewed and revised draft position letter regarding discovery [2]; reviewed and analyzed exhibits to Verett affidavit and prepared summary of same [1.3].	3.3	\$ 400.00	\$ 1,320.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
4/27/2021	BMD	Worked on discovery issues and data analysis [2.2]; prepared for and conducted telephone conference regarding discovery [1.2].	3.4	\$ 400.00	\$ 1,360.00	
4/28/2021	BMD	Worked on discovery issues, revised discovery letter to court [4.6].	4.6	\$ 400.00	\$ 1,840.00	
4/29/2021	BMD	Reviewed documents, worked on discovery letter [2.2].	2.2	\$ 400.00	\$ 880.00	
5/4/2021	BMD	Worked on case management [1]	0.1	\$ 400.00	\$ 40.00	
5/7/2021	BMD	Prepared and discovery conference with opposing counsel [2.5]; telephone conference regarding case strategy [2].	2.7	\$ 400.00	\$ 1,080.00	
5/10/2021	BMD	Prepared for and telephone conference regarding meet and confer with opposing counsel [1]; reviewed and analyzed search term hit list report [3]; email correspondence regarding same [1].	1.4	\$ 400.00	\$ 560.00	
5/11/2021	BMD	Worked on discovery issues, reviewed documents, telephone conference regarding discovery strategy and follow up [2.7].	2.7	\$ 400.00	\$ 1,080.00	
5/19/2021	BMD	Reviewed discovery letter [4]; telephone conference regarding same [4]; reviewed and analyzed defendant's responses to questions regarding data productions [8]; email correspondence regarding same [2]; prepared discovery follow up response to opposing counsel [1].	2.8	\$ 400.00	\$ 1,120.00	
5/20/2021	BMD	Worked on issues regarding Pardot data [9].	0.9	\$ 400.00	\$ 360.00	
5/24/2021	BMD	Reviewed defendants' responses to additional questions regarding Pardot data and exhibits [2.2].	2.2	\$ 400.00	\$ 880.00	
5/28/2021	BMD	Worked on data questions, reviewed documents [1.1]	1.1	\$ 400.00	\$ 440.00	
6/9/2021	BMD	Reviewed productions, worked on discovery issues, and prepared production summary [5].	5	\$ 400.00	\$ 2,000.00	
6/10/2021	BMD	Worked on refund data issues [1.5]; email correspondence regarding analysis [2]; reviewed production and prepared analysis [2].	3.7	\$ 400.00	\$ 1,480.00	
6/11/2021	BMD	Prepared for and telephone conference regarding discovery [2]; worked on production issues, data questions, and analyzed issues regarding outstanding discovery [1.3].	3.3	\$ 400.00	\$ 1,320.00	
6/18/2021	BMD	Email correspondence regarding document production [1]; worked on case management [2].	0.3	\$ 400.00	\$ 120.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
6/22/2021	BMD	Worked on discovery requests, revised and finalized same [3]; reviewed and analyzed data, revised settlement demand [3.2].	6.2	\$ 400.00	\$ 2,480.00	
6/23/2021	BMD	Finalized discovery requests [.3].	0.3	\$ 400.00	\$ 120.00	
6/24/2021	BMD	Worked on discovery and deposition issues, reviewed documents, worked on potential deponents, telephone conference with opposing counsel regarding initial disclosures, prepared summary [2.8]; revised requests for production [.5].	3.3	\$ 400.00	\$ 1,320.00	
6/25/2021	BMD	Worked on case management, reviewed production details [.8]; email correspondence regarding same [.1].	0.9	\$ 400.00	\$ 360.00	
6/28/2021	BMD	Worked on case management [.2]; email correspondence regarding recent production [.1].	0.3	\$ 400.00	\$ 120.00	
6/30/2021	BMD	Worked on settlement issues [.5].	0.5	\$ 400.00	\$ 200.00	
7/1/2021	BMD	Left voicemail for opposing counsel regarding settlement [.1]; email correspondence regarding same [.1]; telephone conference with opposing counsel regarding settlement [.4]; conference regarding settlement strategy [.3]; email correspondence with opposing counsel regarding settlement terms [.1].	1	\$ 400.00	\$ 400.00	
7/6/2021	BMD	Commenced review of document production [.8]; email correspondence regarding same [.1]; reviewed and analyzed settlement offer and insurance policy [3.5]; research regarding policy language [1.2]; email correspondence regarding same [.1].	5.7	\$ 400.00	\$ 2,280.00	
7/12/2021	BMD	Worked on case management, reviewed discovery history, and prepared for and conducted conference regarding discovery status and damages calculations [1.5]; analyzed issues and email correspondence regarding settlement and discovery stay [.3].	1.8	\$ 400.00	\$ 720.00	
7/19/2021	BMD	Worked on case management [.2]; email correspondence regarding settlement discussions [.1].	0.3	\$ 400.00	\$ 120.00	
7/26/2021	BMD	Reviewed and analyzed national payment and refund data [2.5]; prepared summary of analysis [.6]; telephone conference regarding data and damages calculations [.6].	3.7	\$ 400.00	\$ 1,480.00	
8/10/2021	BMD	Analyzed data issues [.5]; responded to email regarding mediation [.1].	0.6	\$ 400.00	\$ 240.00	
9/8/2021	BMD	Prepared for and conducted telephone conference regarding damages calculations [1.1].	1.1	\$ 400.00	\$ 440.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
9/13/2021	BMD	Telephone conferences with NAM regarding mediation [.5]; email correspondence regarding submission schedule [.1].	0.6	\$ 400.00	\$ 240.00	
9/14/2021	BMD	Email correspondence regarding mediation [.1].	0.1	\$ 400.00	\$ 40.00	
9/17/2021	BMD	Outlined mediation letter [1].	1	\$ 400.00	\$ 400.00	
9/20/2021	BMD	Worked on mediation letter [9.5].	9.5	\$ 400.00	\$ 3,800.00	
9/22/2021	BMD	Worked on Livewatch mediation letter [.5].	0.5	\$ 400.00	\$ 200.00	
9/23/2021	BMD	Reviewed and analyzed damages calculations and revisions to mediation letter [.4]; email correspondence regarding same [.1].	0.5	\$ 400.00	\$ 200.00	
9/24/2021	BMD	Email correspondence regarding mediation letter [.2]; telephone conference with NAMS regarding mediation letter [.4]; email correspondence with Mr. Byrne regarding mediation letter [.1].	0.7	\$ 400.00	\$ 280.00	
9/27/2021	BMD	Prepared for and conducted telephone conference regarding damages calculations [1.2].	1.2	\$ 400.00	\$ 480.00	
10/4/2021	BMD	Reviewed term sheet and drafted join status letter to court [.8].	0.8	\$ 400.00	\$ 320.00	
10/5/2021	BMD	Reviewed and revised status report letter [.2].	0.2	\$ 400.00	\$ 80.00	
10/20/2021	BMD	Email correspondence regarding preliminary approval brief and settlement documents [.1].	0.1	\$ 400.00	\$ 40.00	
11/12/2021	BMD	Worked on settlement issues, motion for preliminary approval [8.5].	8.5	\$ 400.00	\$ 3,400.00	
11/15/2021	BMD	Worked on motion for preliminary approval [11.2].	11.2	\$ 400.00	\$ 4,480.00	
11/16/2021	BMD	Revised motion for preliminary approval, research regarding service awards, worked on declaration [8.5]	8.5	\$ 400.00	\$ 3,400.00	
11/17/2021	BMD	Analyzed issues regarding class notice, settlement motion practice, and damages [1.2] email correspondence regarding same [.2]; revised settlement agreement [2.7].	4.1	\$ 400.00	\$ 1,640.00	
11/18/2021	BMD	Analyzed issues regarding class member data [1.2]; email correspondence regarding same [.1]	1.3	\$ 400.00	\$ 520.00	
11/22/2021	BMD	Worked on settlement exhibits [2.2]; analyzed issues regarding notice and damages calculations [.3]; email correspondence regarding same [.1].	2.6	\$ 400.00	\$ 1,040.00	
11/24/2021	BMD	Worked on settlement documents [1].	1	\$ 400.00	\$ 400.00	
12/6/2021	BMD	Analyzed settlement issues and worked on Settlement Documents, prepared summary [4.3].	4.3	\$ 400.00	\$ 1,720.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
12/7/2021	BMD	Reviewed emails regarding settlement documents [.2]; email correspondence regarding same [.1].	0.3	\$ 400.00	\$ 120.00	
12/8/2021	BMD	Reviewed and analyzed revised settlement agreement [.5]; revised preliminary approval motion [.6].	1.1	\$ 400.00	\$ 440.00	
12/10/2021	BMD	Reviewed productions, worked on preliminary approval motion and settlement documents [5.4]; email correspondence regarding same [.1].	5.5	\$ 400.00	\$ 2,200.00	
12/13/2021	BMD	Worked on settlement issues, preliminary approval motion, analyzed notice issues, revised same [4.5]; email correspondence regarding same [.1].	4.6	\$ 400.00	\$ 1,840.00	
12/14/2021	BMD	Reviewed and analyzed defendant's revisions to settlement agreement, revised settlement agreement and exhibits, revised preliminary approval brief [4.1].	4.1	\$ 400.00	\$ 1,640.00	
12/15/2021	BMD	Worked on case management [.2]; worked on settlement and notice issues [1.8]; email correspondence with opposing counsel regarding settlement details [.1].	2.1	\$ 400.00	\$ 840.00	
12/16/2021	BMD	Worked on case management [.2]; email correspondence regarding preliminary approval deadline [.1]; reviewed docket, drafted letter request for extension [.5]; email correspondence with opposing counsel regarding same [.1]; analyzed issues regarding ecf filing requirements [.2]; email correspondence regarding same [.1].	1.2	\$ 400.00	\$ 480.00	
12/17/2021	BMD	Reviewed order granting extension of time, email correspondence regarding same [.2]; worked on settlement issues [.2].	0.4	\$ 400.00	\$ 160.00	
12/21/2021	BMD	Worked on case management [.2]; email correspondence with opposing counsel regarding settlement documents [.1].	0.3	\$ 400.00	\$ 120.00	
1/10/2022	BMD	Revised motion for preliminary approval and supporting documents, worked on settlement issues [4.4].	4.4	\$ 400.00	\$ 1,760.00	
1/11/2022	BMD	Worked on preliminary approval documents, finalized exhibits, analyzed issues regarding settlement distribution, conference regarding same [5]	5	\$ 400.00	\$ 2,000.00	
1/13/2022	BMD	Reviewed and analyzed order granting motion for preliminary approval [4]; email correspondence regarding next steps [.1].	0.5	\$ 400.00	\$ 200.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
1/18/2022	BMD	Analyzed issues regarding settlement notices, worked on settlement issues, email correspondence with settlement administrator [1.3];	2.8	\$ 400.00	\$ 1,120.00	
2/2/2022	BMD	analyzed issues regarding fee petition, prepared task outline [1.5].	0.1	\$ 400.00	\$ 40.00	\$ 40.00
2/3/2022	BMD	Email correspondence regarding settlement administration [1.1].	0.1	\$ 400.00	\$ 40.00	\$ 40.00
2/8/2022	BMD	Email correspondence regarding settlement administration [1.1].	0.1	\$ 400.00	\$ 40.00	\$ 40.00
2/11/2022	BMD	Reviewed email correspondence regarding settlement administration [1.1]. Reviewed settlement agreement, analyzed issues regarding distribution [4]; email correspondence regarding same [1.1].	0.5	\$ 400.00	\$ 200.00	
2/15/2022	BMD	Reviewed email correspondence regarding settlement notices [1.1]; .	0.1	\$ 400.00	\$ 40.00	\$ 40.00
3/8/2022	BMD	Worked on case management, deadlines [4].	0.4	\$ 400.00	\$ 160.00	
3/10/2022	BMD	Worked on case management [2]; email correspondence regarding proposed internal deadlines [1.1].	0.3	\$ 400.00	\$ 120.00	
3/14/2022	BMD	Email correspondence regarding settlement website [1.1].	0.1	\$ 400.00	\$ 40.00	
3/22/2022	BMD	Worked on case management [2]; worked on fee petition [1.2].	1.4	\$ 400.00	\$ 560.00	
3/23/2022	BMD	Worked on fee petition [2.8].	2.8	\$ 400.00	\$ 1,120.00	
3/24/2022	BMD	Worked on fee petition [2].	2	\$ 400.00	\$ 800.00	
3/25/2022	BMD	Worked on fee petition [1.6].	1.6	\$ 400.00	\$ 640.00	
3/28/2022	BMD	Email correspondence regarding fee motion [1.1]; worked on fee motion and supporting documents [3.5].	3.6	\$ 400.00	\$ 1,440.00	
3/29/2022	BMD	Worked on fee petition [1.5].	1.5	\$ 400.00	\$ 600.00	
3/30/2022	BMD	Worked on fee petition [4.5].	4.5	\$ 400.00	\$ 1,800.00	
3/31/2022	BMD	Worked on fee petition [5.7].	5.7	\$ 400.00	\$ 2,280.00	
4/1/2022	BMD	Worked on fee petition [6.3]; email correspondence regarding fee and cost reports [1.1].	6.4	\$ 400.00	\$ 2,560.00	
4/4/2022	BMD	Completed fee petition, revised same, revised declaration, drafted notice of motion [9.5].	9.5	\$ 400.00	\$ 3,800.00	
4/5/2022	BMD	Revised fee petition, declaration [1].	1	\$ 400.00	\$ 400.00	
4/7/2022	BMD	Analyzed issues regarding settlement [1.1]; revised declaration [4].	0.5	\$ 400.00	\$ 200.00	
4/12/2022	BMD	Revised Fee motion [5]; email correspondence regarding same [1.1].	0.6	\$ 400.00	\$ 240.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
4/14/2022	BMD	Reviewed and analyzed fee report, worked on fee motion and exhibits [1.5].	1.5	\$ 400.00	\$ 600.00	
4/18/2022	BMD	Worked on fee motion exhibits [.8]; email correspondence with co-counsel regarding revisions to fee motion [.1].	0.9	\$ 400.00	\$ 360.00	
4/19/2022	BMD	Reviewed co-counsel's revisions to fee motion [.2]; reviewed fee report [.2]; revised fee motion and declaration [1.3];	1.7	\$ 400.00	\$ 680.00	
Statement Professional: Ben Drachler					\$ 132,520.00	\$ 160.00

Statement Professional: Bradford Kinsey

10/6/2020	BKK	Reviewed, revised and finalized Plaintiff's Rule 26(a)(1) initial disclosures [.3]; email correspondence to counsel transmitting same [.1].	0.4	\$ 125.00	\$ 50.00	
10/8/2020	BKK	Prepared drafts of Terrell and Drachler pro hac vice motions and supporting affidavits.	0.8	\$ 125.00	\$ 100.00	
10/15/2020	BKK	Reviewed and revised letter to opposing counsel.	0.2	\$ 125.00	\$ 25.00	
10/19/2020	BKK	Finalized Drachler pro hac vice motion and affidavit [.3]; arranged filing and service [.1].	0.4	\$ 125.00	\$ 50.00	
10/26/2020	BKK	Reviewed and revised Terrell pro hac vice motion and affidavit.	0.3	\$ 125.00	\$ 37.50	
10/27/2020	BKK	Reviewed Terrell pro hac vice motion order [.1]; amended master caption [.1].	0.2	\$ 125.00	\$ 25.00	
11/6/2020	BKK	Reviewed, revised and finalized letter to opposing counsel regarding possible settlement [.3]; email correspondence to counsel transmitting same [.1].	0.4	\$ 125.00	\$ 50.00	
11/17/2020	BKK	Reviewed and revised memorandum in support of motion to amend complaint [.8]; reviewed and revised motion to amend complaint [.2]; revised and finalized Schlanger supporting declaration [.3]; prepared draft of promotion letter to magistrate judge [.2].	1.5	\$ 125.00	\$ 187.50	
12/4/2020	BKK	Reviewed and revised letter to Judge Shields.	0.2	\$ 125.00	\$ 25.00	
Statement Professional: Bradford Kinsey					\$ 550.00	\$ 550.00

Statement Professional: Britt Glass

1/21/2021	BG	Gathered materials for meet and confer letter [0.3].	0.3	\$ 325.00	\$ 97.50	
Statement Professional: Britt Glass					\$ 97.50	\$ 97.50

Date	Initials	Narrative	Units	Rate	Value	Write-Off
Statement Professional: Daniel Lee						
9/11/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50	
10/6/2020	DL	Worked on docketing [0.4]	0.4	\$ 125.00	\$ 50.00	
10/20/2020	DL	Worked on docketing [0.1]	0.1	\$ 125.00	\$ 12.50	
10/27/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
11/2/2020	DL	Worked on docketing [0.6]	0.6	\$ 125.00	\$ 75.00	
11/2/2020	DL	Worked on docketing [0.5]	0.5	\$ 125.00	\$ 62.50	
11/5/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50	
11/16/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
11/20/2020	DL	Worked on docketing [0.5]	0.5	\$ 125.00	\$ 62.50	
11/20/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
11/23/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
Statement Professional: Daniel Lee					\$ 437.50	\$ 437.50
Statement Professional: Eden Nordby						
1/22/2021	EBN	Reviewed complaint and discovery responses for meet and confer letter.	0.5	\$ 325.00	\$ 162.50	
1/25/2021	EBN	Worked on legal and factual research regarding defendants' discovery responses [1]; worked on meet and confer letter to opposing counsel [2.5].	3.5	\$ 325.00	\$ 1,137.50	
1/26/2021	EBN	Reviewed and revised meet and confer letter.	0.2	\$ 325.00	\$ 65.00	
Statement Professional: Eden Nordby					\$ 1,365.00	
Statement Professional: Eric Nusser						
6/17/2020	ERN	Evaluated and analyzed case file and analyzed issues regarding protective order, initial disclosures, and discovery requests [.2].	0.2	\$ 375.00	\$ 75.00	
Statement Professional: Eric Nusser					\$ 75.00	\$ 75.00
Statement Professional: Eva Thomas						
12/4/2020	ET	Docketed deadlines [0.3]	0.3	\$ 125.00	\$ 37.50	
12/11/2020	ET	Reviewed documents for docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
12/15/2020	ET	Docketed deadlines [0.2]; Corresponded with case team and Heather regarding docketing [0.2]	0.4	\$ 125.00	\$ 50.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
12/28/2020	ET	Reviewed case documents and court rules for docketing [0.1]	0.1	\$ 125.00	\$ 12.50	
12/29/2020	ET	Docketed deadlines [0.2]	0.2	\$ 125.00	\$ 25.00	
1/15/2021	ET	Reviewed incoming documents for docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
1/21/2021	ET	Researched procedural rules for docketing [0.2]	0.2	\$ 125.00	\$ 25.00	
1/22/2021	ET	Looked into docketing/filing error and communicated with Jessica and Hannah to resolve [0.2]	0.2	\$ 125.00	\$ 25.00	
2/3/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50	
2/5/2021	ET	Reviewed incoming documents for docketing [0.2]; Filed documents in ProLaw [0.2]	0.4	\$ 125.00	\$ 50.00	
2/8/2021	ET	Troubleshooted problem downloading documents [0.1]	0.1	\$ 125.00	\$ 12.50	
2/23/2021	ET	Docketed deadlines [0.2]	0.2	\$ 125.00	\$ 25.00	
3/8/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50	
3/9/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50	
3/19/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50	
4/1/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50	
4/23/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50	
4/28/2021	ET	Docketed deadlines [0.2]	0.2	\$ 125.00	\$ 25.00	
4/29/2021	ET	Reviewed docket and court rules [0.1]	0.1	\$ 125.00	\$ 12.50	
Statement Professional: Eva Thomas					\$ 425.00	\$ 425.00

Statement Professional: Heather Brown

6/2/2021	HB	Processed defendants' production and shared with co-counsel [1.3].	1.3	\$ 200.00	\$ 260.00	
6/3/2021	HB	Reviewed documents and created production log [.3]. Loaded defendants' document production into lpro and updated production log [.5].	0.3	\$ 200.00	\$ 60.00	
6/10/2021	HB	Worked on loading document production into lpro [.2].	0.2	\$ 200.00	\$ 40.00	
6/11/2021	HB	Finalized exhibits in support of mediation submission [.9].	0.9	\$ 200.00	\$ 180.00	
9/24/2021	HB	Finalized mediation submission and exhibits, Sharefiled same to mediator [0.6].	0.6	\$ 200.00	\$ 120.00	
9/27/2021	HB					
10/18/2021	HB	Finalized and e-filed status letter regarding settlement with the Court [.3].	0.3	\$ 200.00	\$ 60.00	
Statement Professional: Heather Brown					\$ 820.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
Statement Professional: Holly Rota						
1/10/2022	HMR	Worked on plaintiffs' motion for preliminary approval and declaration of Beth E. Terrell.	1.5	\$ 150.00	\$ 225.00	
					\$ 225.00	\$ 225.00
Statement Professional: Jennifer Boschen						
4/1/2021	JJB	Reviewed ESI search terms.	0.6	\$ 200.00	\$ 120.00	
					\$ 120.00	\$ 120.00
Statement Professional: Jessica Langsted						
7/13/2021	JAL	Worked on loading production into ipro [0.7].	0.7	\$ 200.00	\$ 140.00	
					\$ 140.00	\$ 140.00
Statement Professional: Jodi Nuss						
1/25/2021	JN	Reviewed email from Mr. Frazin regarding discovery requests and correspondence and prepared response to same.[.1]	0.1	\$ 200.00	\$ 20.00	
4/27/2021	JN	Reviewed affidavit and exhibits to same[.6]; Personal conference regarding goals of analysis and background for data produced.[.4]	1	\$ 200.00	\$ 200.00	
4/28/2021	JN	Worked on analysis of LiveWatch data and prepared email summarizing same. [2.2]	2.2	\$ 200.00	\$ 440.00	
5/19/2021	JN	Reviewed email regarding answers provided about Mr. Verrett's affidavit and prepared response to same.[.2];	0.2	\$ 200.00	\$ 40.00	
5/20/2021	JN	Worked on data analysis[2.6];Prepared email regarding resolution of concerns with affidavit exhibits and reviewed responses to same.[.1]	2.7	\$ 200.00	\$ 540.00	
5/24/2021	JN	Reviewed email regarding receipt of additional information and exhibits to Mr. Verrett's affidavit and prepared response to same.[.1]	0.1	\$ 200.00	\$ 20.00	
5/27/2021	JN	Telephone conference regarding letter from Mr. Richards.[.1]; Telephone conference regarding tiered search terms.[.3]; Reviewed email from Ms. Hanley regarding final calculation of fees and costs and response to same.[.1]	0.5	\$ 200.00	\$ 100.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
6/21/2021	JN	Worked on processing of production documents.[.9]; Reviewed contents of production and prepared email regarding missing production log and extensive redactions in same.[.1]; Reviewed email from Ms. Ostelof regarding processing of production documents and prepared response to same.[.1]	1.1	\$ 200.00	\$ 220.00	
7/26/2021	JN	Worked on data analysis and identifying scenarios for various damage calculations in advance of mediation.[1.7]	1.7	\$ 200.00	\$ 340.00	
8/13/2021	JN	Worked on data analysis.[2.9]	2.9	\$ 200.00	\$ 580.00	
8/16/2021	JN	Reviewed email from Mr. Schlanger regarding status of review of documents produced in advance of mediation and responses to same.[.1]; Worked on data analysis.[.4]	0.5	\$ 200.00	\$ 100.00	
8/17/2021	JN	Worked on data analysis[2]	2	\$ 200.00	\$ 400.00	
8/18/2021	JN	Reviewed email from Mr. Schlanger regarding documents and information necessary in advance of mediation and prepared response to same.[.1]; Worked on data analysis[2.6]	2.7	\$ 200.00	\$ 540.00	
8/19/2021	JN	Worked on data analysis.[.3]	0.3	\$ 200.00	\$ 60.00	
8/19/2021	JN	Worked on strategy for analysis and identification of supplemental data that may be required to complete same.[.6]	0.6	\$ 200.00	\$ 120.00	
8/27/2021	JN	Worked on data analysis.	2.2	\$ 200.00	\$ 440.00	
9/21/2021	JN	Worked on data analysis for preparation of mediation statement.	0.4	\$ 200.00	\$ 80.00	
9/22/2021	JN	Worked on data analysis and revised mediation statement to include same.[4.3]	4.3	\$ 200.00	\$ 860.00	
9/23/2021	JN	Prepared email regarding damages calculations.[.1]	0.1	\$ 200.00	\$ 20.00	
9/24/2021	JN	Worked on data analysis based on Mr. Schlanger's concerns.[1.6]	1.6	\$ 200.00	\$ 320.00	
9/27/2021	JN	Reviewed email regarding mediation submission and prepared response to same.[.1]	0.1	\$ 200.00	\$ 20.00	
9/27/2021	JN	Calls re data and interest calculations.[.9]; Worked on data analysis[2.5]	3.4	\$ 200.00	\$ 680.00	
9/30/2021	JN	Worked on data analysis for mediation.[.2]; Attended team call regarding additional analysis for use in mediation and completed same.[.3]	0.5	\$ 200.00	\$ 100.00	
10/4/2021	JN	Reviewed term sheet and workflows to identify potential reasoning for removal of class members covered by class list[.3]; Worked on data analysis.[.3]	0.6	\$ 200.00	\$ 120.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
10/5/2021	JN	Worked on data analysis	2.2	\$ 200.00	\$ 440.00	
10/6/2021	JN	Prepared emails regarding source data for analysis and reasons for use of same.[.1]	0.1	\$ 200.00	\$ 20.00	
10/7/2021	JN	Created new output files and list of class members omitted from May 24, 2021 production and prepared email enclosing same.[.1]	0.1	\$ 200.00	\$ 20.00	
10/11/2021	JN	Reviewed email regarding finalizing term sheet and preparation of data supporting positions on same.[.1]; Prepared list of class members to be excluded from class.[.1]	0.2	\$ 200.00	\$ 40.00	
11/18/2021	JN	Reviewed email regarding availability of class member contact information and prepared response to same.[.1]	0.1	\$ 200.00	\$ 20.00	
11/23/2021	JN	Reviewed email regarding potential changes to plans for allocation of settlement funds and identified total actual damages for use in deciding feasibility of same.[.2]	0.2	\$ 200.00	\$ 40.00	
12/29/2021	JN	Reviewed email regarding opposing counsel's questions about methodology for identifying individuals who did not receive refunds and prepared response to same.[.1]; Reviewed emails regarding revisions to declaration and explanation of list of class members identified.[.1]	0.2	\$ 200.00	\$ 40.00	
1/18/2022	JN	Reviewed email regarding final class list and prepared email regarding concerns with same.[.2]	0.2	\$ 200.00	\$ 40.00	
Statement Professional: Jodi Nuss					\$ 7,020.00	
Statement Professional: Tanya Stewart						
12/4/2020	TS	Filed Pre-Motion Conference Letter re Mtn to Amend.	0.3	\$ 125.00	\$ 37.50	
12/17/2020	TS	Prepped 1st Tier RFP	0.2	\$ 125.00	\$ 25.00	
12/18/2020	TS	Revised Pl's Request for "First Tier" Production	0.2	\$ 125.00	\$ 25.00	
12/21/2020	TS	Finalized Pl's "Tier One" RFP (.1); Email to OC re: same (.01).	0.2	\$ 125.00	\$ 25.00	
12/21/2020	TS	Called USDC AZ Court Clerk re: lodging dismissal with court.	0.2	\$ 125.00	\$ 25.00	
12/28/2020	TS	Filed Motion Letter to Extend Deadlines.	0.2	\$ 125.00	\$ 25.00	
1/15/2021	TS	Prepped Dec of Dan Schlanger (.2); Prepped First Amd Complaint as Exhibit to Dec (.2); Prepped Notice as Exhibit 2 to Dec (.2); Prepped Pl's Motion for Leave (.2).	0.8	\$ 125.00	\$ 100.00	
1/26/2021	TS	Finalized and submitted Meet and Confer letter to OC.	0.2	\$ 125.00	\$ 25.00	

Date	Initials	Narrative	Units	Rate	Value	Write-Off
2/2/2021	TS	Prepped Stip re ESI Protocol (.2); Prepped Stip and Order re Confidential Information (.2).	0.4	\$ 125.00	\$ 50.00	
2/3/2021	TS	Finalized Letter to OC (.2); Finalized Stip re ESI Protocol (.2); Stip re Confidential Information (2); sent em to OC re same. (.1).	0.7	\$ 125.00	\$ 87.50	
2/5/2021	TS	Filed Pl's Motion for Leave to Amend Complaint (.1); Pl's Memo iso Motion for Leave (.1); Declaration of D. Schlanger iso Motion for Leave (.1); Supporting Exhibits (.1); Reply iso Motion for Leave (.1).	0.5	\$ 125.00	\$ 62.50	
2/8/2021	TS	Finalized letter to court re: discovery status (.2); filed same (.1).	0.3	\$ 125.00	\$ 37.50	
4/2/2021	TS	Finalized letter to OC [.1]; sent em re: same [.1].	0.2	\$ 125.00	\$ 25.00	
4/9/2021	TS	Finalized Pl's ESI Disclosures [.2]; sent em re: same [.1].	0.3	\$ 125.00	\$ 37.50	
6/22/2021	TS	Worked on 1set of ROGs to defs [.2]; 2nd set of RFPs to defs [.2].	0.4	\$ 125.00	\$ 50.00	
6/23/2021	TS	Finalized Pl's 1st set of ROGs to Def [.2]; Pl's 2nd set of RFPs to Def [.2]; sent em re: same. [.1]	0.5	\$ 125.00	\$ 62.50	
Statement Professional: Tanya Stewart					\$ 700.00	\$ 700.00
Total Before Write-Offs					\$ 174,590.00	\$ 3,180.00
Total After Write-Offs					\$ 171,410.00	