

STATE OF NEW MEXICO
THIRD JUDICIAL DISTRICT COURT
COUNTY OF DONA ANA

LAS CRUCES MEDICAL CENTER, LLC, dba
MOUNTAIN VIEW REGIONAL MEDICAL CENTER,
Plaintiff,

vs.

Case No. D-307-CV-2022-01051
Judge: CASEY B. FITCH

RUBY RAMIREZ,
Defendant.

RUBY RAMIREZ,
on behalf of herself and other
individuals similarly situated,
Counterclaim Plaintiff,

vs.

LAS CRUCES MEDICAL CENTER, LLC, dba
MOUNTAIN VIEW REGIONAL MEDICAL CENTER;
and FABER & BRAND, LLC,
Counterclaim Defendants.

**RUBY RAMIREZ'S AND CLASS COUNSEL'S MOTION FOR
ATTORNEY FEE AWARD AND CLASS REPRESENTATIVE SERVICE AWARD**

On April 24, 2025, the Court granted preliminary approval to the proposed Class Action Settlement. *See* Order filed 4/24/25. Provided the Court so approve, the Parties have agreed to a settlement that provides affirmative relief of \$625 statutory damages per class member, plus an additional amount for actual damages to each class member to the extent he or she paid anything to Defendants, to be paid from a class fund of \$399,375 to all who do not exclude themselves, with no reversion to Defendants.¹ *See* Motion filed 4/7/25 at Exhibit 1, Settlement Agreement.

¹ Class members total 272 persons. It is expected the class fund will cover 100 percent of all class member actual damages, but to the extent that does not prove to be true, each class member will be provided an actual damage amount with a pro rata reduction. Conversely, if the class fund is not exhausted, because, for example, some class members cannot be located, the amount left in the fund will be distributed to a *cy pres* recipient.

In addition, the Settlement provides for robust injunctive relief, so that the challenged unlawful conduct – suing indigent New Mexicans on medical debt in violation of the Patients Debt Collection Practices Act (“PDCPA”) – does not continue in the future. *See id.*

The Settlement does not contain any “clear sailing” provision regarding attorney fees, by which Defendants would have agreed to not contest fees if the fee request were equal to or less than a defined sum. *See id.*

After significant motion practice and discovery, plus arms-length settlement negotiations that lasted more than one year, with any “sticking points” resolved by Charles R. Peifer as the Parties had agreed, Class Counsel submits that the Settlement represents an outstanding result. *See id.* Class Counsel’s and the Class Representative’s long-standing and significant efforts were in service to the Class, with no guarantee of individual recovery for themselves. Accordingly, Class Counsel now moves the Court to award attorney fees in the amount of \$131,362.99 inclusive of costs.² Class Counsel and the Class Representative also move for approval of a \$10,000 class representative service award.

I. The Requested Attorney Fee Is Reasonable

New Mexico uses a flexible analysis for calculating class counsel fee awards, mindful of the “circumstances of each case,” with the touchstone being whether the fee request is reasonable under the unique realities of the specific lawsuit. *See In re New Mexico Indirect Purchasers Microsoft Corp. Antitrust Litigation*, 2007-NMCA-7, ¶ 39. Accordingly, the trial court has very broad discretion when it comes to awarding fees to class counsel.

² This amount includes an estimated five additional hours each for Rob Treinen and Sovereign Hager, who have acted as Class Counsel since the beginning of this litigation. Five hours each represents a conservative estimate of the additional time needed to coordinate settlement logistics with the class administrator, work with opposing counsel to effectuate the settlement and obtain Court approval of the settlement, answer questions from class members once Notice is provided, and attend the Settlement Hearing set for July 17, 2025. *See* Notice filed 4/24/25.

We do not reverse a decision under the abuse of discretion standard, unless the ruling below exceeds the bounds of all reason or is arbitrary, fanciful, or unreasonable. Indeed abuse of discretion – already one of the most deferential standards of review – takes on special significance when a court is reviewing fee decisions. The district court, which is intimately familiar with the nuances of the case, is in a far better position to make such decisions than is an appellate court, which must work from a cold record.

Id. at ¶ 14 (citation, quotation marks and editorial parenthesis omitted).

The same eight-factor test that guides the consideration of a fee request in the non-class context is also used in the class context.

Rule 16-105(A) establishes the following factors to be considered:

- (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly;
- (2) the likelihood that the acceptance of the particular employment will preclude other employment by the lawyer;
- (3) the fee customarily charged in the locality for similar legal services;
- (4) the amount involved and the results obtained;
- (5) the time limitations imposed by the client or by the circumstances;
- (6) the nature and length of the professional relationship with the client;
- (7) the experience, reputation, and ability of the lawyer performing the services; and
- (8) whether the fee is fixed or contingent.

Id. at ¶ 77 (ellipses omitted). “The factors are not of equal weight, and all of the factors need not be considered.” *Id.* at ¶ 77.

Here, all applicable factors support the present fee request, which is based on a lodestar calculation.³

³ “The lodestar method is ordinarily used in statutory fee-shifting cases because it provides adequate fees to attorneys who undertake litigation that is socially beneficial.” *Atherton v. Gopin*, 2012-NMCA-23, ¶ 7. Here, the Class Representative brought claims for violations of the Unfair Practices Act, NMSA §§ 57-12-1 *et seq.* (“UPA”), and for violations of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 *et seq.* (“FDCPA”), all predicated on Defendants’ violations of the Patient Debt Collection Practices Act (“PDCPA”). See Answer and Class Counterclaims filed 10/11/22. The Settlement provides for robust monetary relief and injunctive relief based on these claims. See Motion filed 4/7/25 at Exhibit 1, Settlement Agreement. The UPA mandates attorney fees for a successful claimant. See NMSA § 57-12-10(C) (“The court *shall* award attorney fees and costs to the party complaining of an unfair or deceptive trade practice or unconscionable trade practice if the party prevails.”) (emphasis added). See also *Jones v. General Motors Corporation*, 1998-NMCA-20, ¶ 25 (courts must award “the full amount of fees fairly and reasonably incurred by Plaintiff in securing an award under the UPA”); *Garcia v. Coffman*, 1997-NMCA-92, ¶¶ 44-48 (where UPA liability established, even where plaintiff elected to recover damages under another claim, plaintiff is entitled to an award of full attorney fees and costs under the UPA). The same is true with the FDCPA. See 15 U.S.C. § 1692(a)(3) (“any debt collector who fails to comply with any

One way of arriving at a reasonable fee is the "lodestar" method, which was the method chosen by the court in this case. In this method, the court determines a fee that approximates a reasonable hourly rate multiplied by the number of hours reasonably incurred in the representation. This value serves as a starting point for the calculation of a reasonable fee.

Atherton v. Gopin, 2012-NMCA-23, ¶ 7 (quotation marks and citations omitted).

First, the Class benefited from the expertise of specialty practitioners in consumer class actions, which was of special benefit given the claims in this lawsuit involved a new consumer protection statute, which had not yet been tested in the courts, namely, the PDCPA. *See* Exhibit A, Treinen Affidavit; Exhibit B, Hager Affidavit. Class Counsel are aware of no other class case – or even any individual action – involving the PDCPA. *See id.* Second, this class action constituted a significant commitment of attorney time and resources, thus precluding other employment by Class Counsel. *See id.* Third, the fees requested are computed via a lodestar calculation – time spent multiplied by hourly rate – which is presumptively reasonable. *See Perdue v. Kenny A.*, 559 U.S. 542, 552 (2010) (“the lodestar method yields a fee that is presumptively sufficient to achieve [the] objective” of awarding reasonable fees) (citations omitted); *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565

provision of this title [15 USCS §§ 1692 *et seq.*] with respect to any person is liable to such person in an amount equal to the sum of . . . in the case of any successful action to enforce the foregoing liability, the costs of the action, together with a reasonable attorney’s fee as determined by the court”). *See also Evon v. Law Offices of Sidney Mickell*, 688 F.3d 1015, 1032 (9th Cir. 2012); *Zagorski v. Midwest Billing Services, Inc.*, 128 F.3d 1164 (7th Cir. 1997); *Emanuel v. American Credit Exchange*, 870 F.2d 805, 809 (2d Cir. 1989). A claimant who achieves a favorable settlement is a “prevailing party” under the applicable fee-shifting statute. *See Farrar v. Hobby*, 506 U.S. 103, 111 (1992) (party is deemed the prevailing party where the lawsuit is resolved through settlement provided that party obtains “at least some relief on the merits of his claim.”); *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983) (“prevailing party” is the party that “succeed[s] on any significant issue in litigation which achieves some of the benefit the parties sought in bringing suit”) (quotation marks and citation omitted); *Ashley v. Atlantic Richfield Company*, 794 F.2d 128, 134 (3d Cir. 1986) (“[W]hen a [claimant] obtains some of the benefit sought through a settlement, she is a prevailing party and will be entitled to a fee award unless the court finds it to be an exceptional case.”) (quotation marks and citation omitted); *Kim v. Euromotors West*, 56 Cal. Rptr. 3d 780 (Cal. Ct. App. 2007) (reversing trial court for failure to apply prevailing party analysis and award fees in lawsuit resolved by settlement where claims included claim under California Consumers Legal Remedies Act). “A court determination of the merits is not required for [the claimant] to be found the prevailing party.” *Chicano Police Officer’s Association v. Stover*, 624 F.2d 127, 131 (10th Cir. 1980). Moreover, the Settlement expressly provides that Defendants shall pay “attorney fees and costs” to Class Counsel, with the Court to determine a reasonable amount. *See* Motion filed 4/7/25 at Exhibit 1, Settlement Agreement, § II(5).

(1986) (“A strong presumption that the lodestar figure – the product of reasonable hours times reasonable rate – represents a reasonable fee is wholly consistent with the rationale behind the usual fee-shifting statute.”) (quotation marks and citation omitted); *Hartman v. Rubio*, No. 23-cv-5126, 2025 U.S. App. LEXIS 2259, *2 (D. D.C. Jan. 31, 2025) (“The lodestar is presumptively reasonable because it includes most, if not all, of the relevant factors constituting a reasonable attorney's fee.”) (quotation marks and citation omitted); *Weiser v. Pathway Services, Inc.*, No. 17-cv-673, 2019 U.S. Dist. LEXIS 216178, *3 (N.D. Okla. Aug. 26, 2019) (“lodestar method yields a presumptively reasonable fee”) (citation omitted).

Moreover, Class Counsel’s hourly rates – \$350 for Rob Treinen, \$300 for Sovereign Hager, Legal Director for New Mexico Center on Law and Poverty, and \$250 for staff attorneys under Ms. Hager – are reasonable given their experience and accomplishments. *See* Exhibit A, Treinen Affidavit; Exhibit B, Hager Affidavit. *See also In re New Mexico Indirect Purchasers Microsoft Corp. Antitrust Litigation*, 2007-NMCA-7 at ¶ 65 (“The judge, familiar with the case and the normal rates in the area, may rely on his own knowledge to supplement the evidence regarding a reasonable hourly rate.”) (citations omitted); *id.* at ¶ 15 (“a fee application should not result in a second major litigation”) (quotation marks and citation omitted)

Fourth, the result obtained compares favorably to the amounts involved, with relief to class members to exceed the amount of actual damages that each sustained, given class relief provides for a robust class fund, a statutory damage component of \$625 per class member, plus payment of actual damages. *See* Motion filed 4/7/25 at Exhibit 1, Settlement Agreement. Such robust class recovery is rare. The fifth and sixth factors do not apply to this lawsuit. The seventh factor – the experience, reputation, and ability of Class Counsel – also favors granting the present fee request. *See* Exhibit A, Treinen Affidavit; Exhibit B, Hager Affidavit.

Finally, the eighth and last factor – whether the fee is fixed or contingent – strongly supports the present fee request. Class Counsel have been paid nothing, have fronted all costs, and took on this lawsuit entirely on the gamble that a successful outcome would support an appropriate fee request. *See id.* Courts have observed that “[a]ttorneys’ risk is perhaps the foremost factor in determining an appropriate fee award.” *See Francisco v. Numismatic Guaranty Corporation*, No. 06-cv-61677, 2008 U.S. Dist. LEXIS 125370 at *33 (S.D. Fla. Jan. 31, 2008). A “determination of a fair fee for Class Counsel must include consideration of the contingent nature of the fee, the wholly contingent outlay of out-of-pocket sums by Class Counsel, and the fact that the risks of failure and nonpayment in a class action are extremely high.” *Pinto v. Princess Cruise Lines*, 513 F. Supp.2d 1334, 1339 (S.D. Fla. 2007). Indeed, “[a] contingency fee arrangement often justifies an increase in the award of attorney’s fees.” *In re Checking Account Overdraft Litigation*, 830 F.Supp.2d 1330, 1364 (S.D. Fla. 2011).

II. The Requested Class Representative Service Award for Ms. Ramirez Is Reasonable and Appropriate

"[I]ncentive awards are an efficient and productive way to encourage members of a class to become class representatives, and to reward the efforts they make on behalf of the class.” *Shaw v. Interthinx, Inc.*, No. 13-cv-1229, 2015 U.S. Dist. LEXIS 52783 at *24 (D. Colo. 2015). Courts regularly approve class representative service awards of \$20,000 where the results justify such an award. *See e.g. Jones v. I.Q. Data International, Inc.*, 2015 U.S. Dist. LEXIS 137209 at * 5 (D. N.M. 2015) (approving Service Award to the named plaintiff in the amount of \$20,000); *Hageman v. AT&T Mobility LLC*, 2015 U.S. Dist. LEXIS 25595, *12 (D. Mont. 2015) (approving named plaintiff’s requested incentive award of \$20,000 as “fair, reasonable and appropriate”). Courts have approved service awards because class representatives take risks and perform services that benefit the class. *See Albert Conte and Herbert B. Newberg*, 4 NEWBERG

ON CLASS ACTIONS, §11.38 (4th ed.). Indeed, “since without the named plaintiff there can be no class action, such compensation as may be necessary to induce him to participate in the suit could be thought the equivalent of the lawyers’ non-legal but essential case specific expenses.” *In re Continental Illinois Securities Litigation*, 962 F. 2d 566, 571 (7th Cir. 1992).

Here, to provide for maximally robust recovery for the class members, Ruby Ramirez, the Class Representative, seeks a service award of only \$10,000.⁴ Ms. Ramirez gathered documents for Class Counsel and was involved in every step of the litigation, including every step of the extended settlement negotiations. *See* Exhibit B, Hager Affidavit. Perhaps most importantly, Ms. Ramirez made sure that the absent class members obtained a fair result through her own personal sacrifice. The requested service award of \$10,000 is both fair and reasonable.

III. Conclusion

Class Counsel and the Class Representative respectfully request that the Court award payment of attorney fees in the amount of \$131,362.99 inclusive of costs, plus a class representative service award to Ms. Ramirez in the amount of \$10,000.⁵

⁴ The Settlement provides for payment of a \$10,000 class representative service award if the Court so approves. *See* Motion filed 4/7/25 at Exhibit 1, Settlement Agreement, § II(6).

⁵ Class Counsel and the Class Representative do not seek, at this time, a ruling on fees, costs and the class representative service award. Rather, they have filed this Motion at this juncture to make sure class members are fully and fairly apprised of all issues. To this end, in the Notice, class members were told that the Settlement includes a term for “[p]ay[ment of] attorney’s fees and costs in the amount approved by the Court.” *See* Motion filed 4/7/25 at Exhibit 1, Settlement Agreement, Exhibit A (Notice). Class members were further told:

Class Counsel will seek less than \$150,000 in attorneys fees and costs from the Court. Any award of fees and costs will be paid separately from the money that is paid to class members. *See id.* In the Notice, class members were also informed about the class representative service award that is being requested per this Motion: “Plaintiffs will ask the Court to award \$10,000 to the class representative in this case.” *See id.* Per the objection process, plus at the Settlement Hearing, class members will have an opportunity to object to any aspect of the proposed settlement. *See* Motion filed 4/7/25 at Exhibit 1, Settlement Agreement. Thus, to provide all class members ample due process, Class Counsel and the Class Representative do not seek a ruling on fees, costs and the class representative service award until all are heard at the Settlement Hearing.

Respectfully submitted:

/s/ Sovereign Hager

Sovereign Hager
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/s/ Rob Treinen

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Class Counsel

I CERTIFY that I served a copy of the foregoing pleading by emailing the same to Linda M. Vanzi and Melanie B. Stambaugh, attorneys for Counterclaim Defendant Las Cruces Medical Center, LLC dba Mountain View Regional Medical Center, at lvanzi@rodey.com and mstambaugh@rodey.com; and to Richard M. Padilla, William R. Anderson and Penelope M. Quintero, attorneys for Counterclaim Defendant Faber & Brand, LLC, at rpadilla@obrienlawoffice.com, wanderson@obrienlawoffice.com and pquintero@obrienlawoffice.com, on May 8, 2025.

/s/ Sovereign Hager

Sovereign Hager

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Counterclaim Defendants.

AFFIDAVIT OF ROB TREINEN

STATE OF NEW MEXICO)
)
COUNTY OF BERNALILLO) ss.

Rob Treinen, the affiant, having been sworn, states upon oath:

1. I am the founding attorney of Treinen Law Office PC of Albuquerque, New Mexico. My firm represents Class Representative Ruby Ramirez and the Class in this lawsuit, along with New Mexico Center on Law and Poverty.
2. I submit this Affidavit in support of the Ruby Ramirez’s and Class Counsel’s Motion for Attorney Fee Award and Class Representative Service Award.

3. This lawsuit involved interpretation and application of a new consumer protection statute, namely, the Patients Debt Collection Practices Act (“PDCPA”).
4. I am not aware of any other class case – or even any individual action – involving the PDCPA.
5. I graduated *cum laude* from the University of Minnesota Law School in 1999. I am licensed to practice law in New Mexico, Colorado, Navajo Nation (inactive), Zuni Tribal Court, United States Federal District Court for the District of New Mexico, the Tenth Circuit Court of Appeals and the United States Supreme Court. I am in good standing in all these jurisdictions.
6. After graduating from law school in 1999, I worked for New Mexico Legal Aid in Gallup, New Mexico, primarily in the field of consumer law. After one-and-one-half years at New Mexico Legal Aid, I began working for Feferman & Warren, in Albuquerque, New Mexico, practicing exclusively consumer law. In 2009, this firm became known as Feferman Warren & Treinen PA. In 2010, I left Feferman Warren & Treinen PA to start my own practice, Treinen Law Office PC, where nearly all my practice is consumer law.
7. I have personally handled more than 300 lawsuits where I represented consumers. I have been the attorney primarily responsible for the representation of plaintiffs in 25-30 consumer class actions.
8. I have served as a testifying expert on proposed consumer protection bills before the New Mexico Senate.
9. I have served as co-chair on a committee charged with developing CLE courses in consumer law topics to be offered to attorneys nationwide for the National Consumer Law Center and the National Association of Consumer Advocates.
10. I have presented legal education courses on consumer law topics sponsored by the National Consumer Law Center, the National Association of Consumer Advocates, the New Mexico

Trial Lawyers Association, the First Judicial District of New Mexico, Gonzaga Law School, the Bankruptcy Section of the New Mexico State Bar, the North American Collection Agency Regulatory Association, New Mexico Legal Aid and Santa Fe Neighborhood Law Center.

11. I have presented on consumer law topics to the general public where the presentation was sponsored by the City of Albuquerque's Consumer Financial Protection Initiative and the Navajo Nation Human Rights Commission.
12. I have presented on consumer law topics to law students at the University of New Mexico School of Law.
13. For the past ten years, I have served as the State Ambassador for New Mexico for Public Justice, an organization in Washington D.C. that provides nationwide attorney support with high impact litigation intended to combat social and economic injustice. I have co-counseled several New Mexico lawsuits with Public Justice, including *Dalton v. Santander Consumer USA, Inc.*; *Rivera v. American General Financial Services, Inc.*; *Felts (Gilstrap) v. CLK Management, Inc.* and *Cordova v. World Finance Corporation of New Mexico*. Citations to favorable published opinions obtained in these lawsuits are set forth below.
14. For the past ten years, I have served as a Board Member for the New Mexico Trial Lawyers Association, which provides attorney support, education, and amici services for the plaintiff's side of the New Mexico Bar, including for those who practice consumer law.
15. Every year since 2001, I have undergone at least 25 hours of training in consumer law topics. Some of this training is specific to class actions. During this same time period, I have been a member of the National Association of Consumer Advocates, a national association of consumer law attorneys.
16. Favorable published decisions in lawsuits that I have handled include *Hernandez v. Outwest*

Auto Corral, LLC, 2025-NMCA-1; *Salas v. Guadalupe Credit Union*, 2025-NMSC-6; *Sanchez v. United Debt Counselors, LLC*, 2024-NMSC-26 (local counsel for amicus Public Justice and National Consumer Law Center); *Dollens v. Wells Fargo Bank N.A.*, 2021-NMCA-39; *Peavy v. Skilled Healthcare Group, Inc.*, 2020-NMSC-10 (local counsel for amicus New Mexico Trial Lawyers Association and American Association for Justice); *Dollens v. Wells Fargo Bank N.A.*, 2015-NMCA-96; *Fishback v. HSBC Retail Services, Inc.*, 944 F.Supp.2d 1098 (D. N.M. 2013); *Felts v. Accredited Collection Agency, Inc.*, 267 F.R.D. 377 (10th Cir. 2011); *Anchondo v. Anderson, Crenshaw & Associates, LLC*, 616 F.3d 1098 (10th Cir. 2011); *Rivera v. American General Financial Services, Inc.*, 2011-NMSC-33; *Felts v. CLK Management, Inc.*, 2011-NMCA-62; *Pedroza v. Lomas Auto Mall, Inc.*, 663 F.Supp.2d 1123 (D. N.M. 2009); *Cordova v. World Finance Corporation of New Mexico*, 2009-NMSC-21; *Pedroza v. Lomas Auto Mall, Inc.*, 258 F.R.D. 453 (D. N.M. 2009); *Pedroza v. Lomas Auto Mall, Inc.*, 600 F.Supp.2d 1200 (D. N.M. 2009); *Anchondo v. Anderson, Crenshaw & Associates, LLC*, 256 F.R.D. 661 (D. N.M. 2009); *Pedroza v. Lomas Auto Mall, Inc.*, 600 F.Supp.2d 1162 (D. N.M. 2009); *Pedroza v. Lomas Auto Mall, Inc.*, 600 F.Supp.2d 1173 (D. N.M. 2009); *Anchondo v. Anderson, Crenshaw & Associates, LLC*, 583 F.Supp.2d 1278 (D. N.M. 2009); *Fiser v. Dell Computer Corporation*, 2008-NMSC-46 (local counsel for amicus Public Justice); *Billsie v. Brooksbank*, 525 F.Supp.2d 1290 (D. N.M. 2007).

17. This lawsuit settled after extensive non-collusive negotiations between the Parties, with some “sticking points” resolved by a settlement arbitrator, Charles Peifer, who the Parties hired for this purpose.
18. My firm keeps track of time spent and litigation-related costs through time-keeping software called TABS. Entries are recorded contemporaneously.

19. As shown by the attached records of time and costs accrued, my firm has spent a total of \$45,107.99 in attorney time and costs on this lawsuit, inclusive of gross receipts tax. This figure includes an estimated five additional hours for the additional time needed to coordinate settlement logistics with the class administrator, work with opposing counsel to effectuate the settlement and obtain Court approval of the settlement, answer questions from class members once Notice is provided, and attend the Settlement Hearing. The fees and costs sought are itemized in the attached document. These fees and costs were accrued to advance this lawsuit to its successful conclusion.
20. My current hourly rate, which is the rate I charge to paying clients and on contingency matters, is \$350. This rate is reasonable for an attorney in New Mexico of my experience, reputation and accomplishments. I was awarded attorney fees at this rate most recently in *Valdez v. Le Energy, LLC*, No. D-117-CV-2022-179 (Rio Arriba County District Court), Order filed 3/5/25.
21. My firm has been paid nothing, has fronted all costs, and took on this lawsuit entirely on the gamble that a successful outcome would support an appropriate fee request.



ROB TREINEN

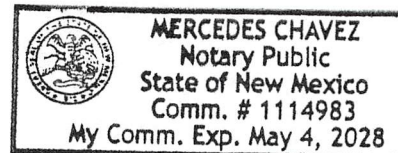
SWORN to before me on May 7, 2025, by Rob Treinen.

My Commission Expires:

5/4/2028



Notary Public



Ruby Ramirez

Account No: 409-00
Statement No: 2448

co-counsel with NMCLP

Interim Statement

Fees

			Rate	Hours	
09/26/2022	RT	Review draft complaint, draft co-counsel agreement, draft retainer agreement	295.00	0.50	147.50
	RT	Zoom w/ NMCLP re draft Complaint, strategy concerning possible defenses, next steps	295.00	0.80	236.00
	RT	Emails to/from NMCLP re next steps	295.00	0.20	59.00
09/27/2022	RT	Zoom w/ NMCLP and client re class rep duties	295.00	0.50	147.50
09/29/2022	RT	Emails to/from Cordova re retainer agreement	295.00	0.10	29.50
09/30/2022	RT	Revisions to draft retainer agreement with client, draft co-counsel agreement	295.00	0.60	177.00
	RT	Email to team re draft retainer agreement with client, draft co-counsel agreement, draft complaint, next steps	295.00	0.10	29.50
	RT	Legal research re removal issues, implied cause of action	295.00	0.50	147.50
10/03/2022	RT	Revise draft complaint	295.00	1.10	324.50
	RT	Email to NMCLP re draft complaint	295.00	0.10	29.50
10/04/2022	RT	Respond to email from Cordova re TRO	295.00	0.10	29.50
10/05/2022	RT	Respond to email from Cordova re draft complaint	295.00	0.10	29.50
10/06/2022	RT	Zoom w/ NMCLP re draft complaint, plan of action for next week	295.00	0.90	265.50
	RT	Email to Cordova re draft Complaint	295.00	0.10	29.50
10/10/2022	RT	Respond to email from Cordova re setting up time to talk	295.00	0.10	29.50
	RT	Zoom w/ NMCLP re draft complaint, service logistics	295.00	0.40	118.00
	RT	Work on EOA	295.00	0.30	88.50
10/11/2022	RT	Review and sign revised co-counsel agreement; emails to and from Cordova re same	295.00	0.20	59.00
	RT	Review and edit proposed motion and order for injunctive relief; emails to/from Cordova re same	295.00	0.40	118.00
10/12/2022	RT	Emails to/from NMCLP re contact from other potential class			

co-counsel with NMCLP

			Rate	Hours	
		members generated by newspaper article	295.00	0.40	118.00
10/13/2022	RT	Respond to email from Cordova re next steps	295.00	0.10	29.50
10/14/2022	RT	Emails to/from Cordova re contact by Def's in-house counsel	295.00	0.40	118.00
10/17/2022	RT	Emails to/from Cordova re next steps	295.00	0.40	118.00
10/18/2022	RT	Edit motion for TRO	295.00	0.50	147.50
	RT	Telecon with in-house counsel for LCMC re possible resolution, TRO	295.00	0.30	88.50
	RT	Emails to/from NMCLP re next steps	295.00	0.20	59.00
10/19/2022	RT	Respond to email from team re service on F&B	295.00	0.10	29.50
10/21/2022	RT	Emails to/from team re TRO motion	295.00	0.50	147.50
10/22/2022	RT	Emails to/from Cordova re TRO motion	295.00	0.20	59.00
	RT	Emails to/from Cordova re TRO motion	295.00	0.20	59.00
10/24/2022	RT	Respond to email from team re TRO motion	295.00	0.10	29.50
10/25/2022	RT	Emails to/from Cordova re TRO motion	295.00	0.20	59.00
10/31/2022	RT	Edit newly revised TRO motion	295.00	0.40	118.00
	RT	Emails to/from Cordova re TRO motion	295.00	0.20	59.00
11/01/2022	RT	Respond to email from Cordova re logistics with hearing on TRO motion. service of TRO motion on Faber & Brand	295.00	0.20	59.00
11/03/2022	RT	Respond to email from Cordova re next steps	295.00	0.10	29.50
11/09/2022	RT	Emails to/from team re potential additional class reps	295.00	0.30	88.50
11/19/2022	RT	Respond to email from Cordova re next steps	295.00	0.20	59.00
11/21/2022	RT	Respond to email from Cordova re potential former employee witness	295.00	0.20	59.00
11/22/2022	RT	Respond to email from Cordova re briefing logistics with Reply in support of Motion for TRO	295.00	0.10	29.50
11/29/2022	RT	Email to team re next steps, logistics with 12/7 hearing	295.00	0.10	29.50
11/30/2022	RT	Respond to email from team re logistics with Reply in support of TRO Motion; logistics with 12/7 hearing	295.00	0.20	59.00
12/01/2022	RT	Respond to email from Cordova re responding to hospital's argts on TLO motion	295.00	0.20	59.00
12/02/2022	RT	Respond to email from team re logistics for upcoming hearing	295.00	0.10	29.50

co-counsel with NMCLP

			Rate	Hours	
12/04/2022	RT	Review Responses to TRO Motion	295.00	0.70	206.50
	RT	Review and add redline suggested edits and comments to draft Reply in support of TRO	295.00	1.80	531.00
	RT	Email to team re draft Reply in support of TRO	295.00	0.20	59.00
12/05/2022	RT	Zoom w team to prep for oral argument on TRO motion	295.00	0.80	236.00
	RT	Emails to/from Cordova re Reply	295.00	0.30	88.50
12/07/2022	RT	Attend oral argt on TRO motion	295.00	1.20	354.00
	RT	Emails to/from team re next steps	295.00	0.50	147.50
12/08/2022	RT	Work on first set of discovery to LCMC	295.00	1.90	560.50
	RT	Work on first set of discovery to Faber & Brand	295.00	1.00	295.00
	RT	Email to team re draft first sets of discovery to LCMC and Faber & Brand	295.00	0.10	29.50
12/15/2022	RT	Email to team re draft discovery	295.00	0.10	29.50
12/19/2022	RT	Emails to/from team re draft discovery	295.00	0.30	88.50
	RT	Revise draft first set of discovery to LCMC	295.00	0.50	147.50
	RT	Revise draft first set of discovery to Faber & Brand	295.00	0.30	88.50
12/20/2022	RT	Finalized first set of discovery to LCMC	295.00	0.10	29.50
	RT	Finalized first set of discovery to F&B	295.00	0.10	29.50
	RT	Email to team re first sets of discovery	295.00	0.10	29.50
12/30/2022	RT	Respond to text from Williams re next steps	295.00	0.10	29.50
01/04/2023	RT	Email to team re hearing set for 1/25, discovery served on client by LCMC	295.00	0.10	29.50
01/05/2023	RT	Emails to/from team re hearing set for 1/25, discovery served on client by LCMC	295.00	0.10	29.50
01/10/2023	RT	Zoom meeting with team re logistics with responding to discovery served on client	295.00	0.30	88.50
01/11/2023	RT	Respond to email from Cordova re logistics re responding to discovery served on client	295.00	0.10	29.50
01/17/2023	RT	Respond to email from Cordova re our discovery responses	295.00	0.10	29.50
01/19/2023	RT	Respond to email from counsel for F&B re their request for extension for their discovery responses	295.00	0.10	29.50
01/20/2023	RT	Respond to email from counsel for LCMC re their request for extension for their discovery responses	295.00	0.10	29.50
01/25/2023	RT	Emails to/from team re logistics with status conference in light of Court resetting it	295.00	0.20	59.00
01/26/2023	RT	Court's opinion on motion for preliminary injunction, making notes			

co-counsel with NMCLP

			Rate	Hours	
		concerning important passages and concerning next steps	295.00	0.50	147.50
01/27/2023	RT	Email to team analyzing Court's opinion on motion for preliminary injunction	295.00	0.40	118.00
01/31/2023	RT	Work on responses to LCMC's 1st set of discovery	295.00	2.00	590.00
02/01/2023	RT	Work on responses to LCMC's 1st set of discovery	295.00	0.40	118.00
	RT	Work on responses to F&B's 1st set of discovery	295.00	2.10	619.50
	RT	Email to team re draft discovery responses	295.00	0.10	29.50
02/03/2023	RT	Emails to/from F&B counsel re its request for addtl ext for its discovery responses	295.00	0.30	88.50
	RT	Work on responses to LCMC's 1st set of discovery including zoom meeting with client, Cordova, Williams	295.00	0.70	206.50
	RT	Work on responses to F&B's 1st set of discovery including zoom meeting with client, Cordova, Williams	295.00	0.80	236.00
02/06/2023	RT	Respond to email from Cordova re client's discovery responses	295.00	0.10	29.50
02/08/2023	RT	Email to team re client discovery responses	295.00	0.10	29.50
	RT	Email to client re status of case	295.00	0.10	29.50
02/17/2023	RT	Email to client re status of case	295.00	0.10	29.50
	RT	Work on client discovery responses	295.00	0.50	147.50
02/18/2023	RT	Work on client discovery responses	295.00	0.40	118.00
	RT	Email to client, team re client discovery responses	295.00	0.30	88.50
02/20/2023	RT	Emails to/from Cordova re client discovery responses	295.00	0.20	59.00
02/22/2023	RT	Review F&B's discovery responses	295.00	0.90	265.50
	RT	Work on good faith letter to F&B counsel	295.00	2.10	619.50
	RT	Email to team re draft good faith letter to F&B counsel	295.00	0.10	29.50
	RT	Begin review of LCMC's discovery responses	295.00	0.40	118.00
02/23/2023	RT	Continue review of LCMC's discovery responses	295.00	0.80	236.00
	RT	Work on good faith letter to F&B counsel	295.00	0.40	118.00
	RT	Work on good faith letter to LCMC counsel	295.00	3.80	1,121.00
	RT	Call to Cordova and email to client re client discovery responses	295.00	0.20	59.00
	RT	Email to team re draft good faith letter to LCMC counsel	295.00	0.10	29.50
02/24/2023	RT	Work on good faith letter to F&B counsel	295.00	0.70	206.50
	RT	Email to F&B counsel re good faith letter	295.00	0.10	29.50
	RT	Texts and call with Cordova re client discovery responses	295.00	0.20	59.00
02/25/2023	RT	Respond to emails from Cordova and client re client discovery responses	295.00	0.20	59.00
02/28/2023	RT	Work on good faith letter to LCMC	295.00	0.30	88.50
	RT	Email to LCMC counsel re good faith letter	295.00	0.20	59.00

co-counsel with NMCLP

			Rate	Hours	
03/07/2023	RT	Emails to/from team re settlement overtures from LCMC counsel	295.00	0.30	88.50
	RT	Respond to email from LCMC counsel re settlement possibilities	295.00	0.10	29.50
03/08/2023	RT	Respond to email from LCMC counsel re settlement possibilities	295.00	0.10	29.50
03/15/2023	RT	Call with Vanzi, Schultz (and Cordova, Hager) re settlement possibilities, discovery issues	295.00	0.50	147.50
	RT	Draft proposed email to other side re status of settlement negotiations, discovery issues; send same to Hagar and Cordova for their review	295.00	0.90	265.50
03/16/2023	RT	Respond to email from Hagar re next steps	295.00	0.40	118.00
	RT	Email to LCMC counsel re settlement negotiations, discovery issues	295.00	0.10	29.50
03/22/2023	RT	Work on motion to compel Faber & Brand	295.00	6.20	1,829.00
	RT	Email to Hagar, Cordova re motion to compel F&B	295.00	0.10	29.50
03/24/2023	RT	Work on motion to compel Faber & Brand	295.00	0.30	88.50
	RT	Email to Cordova, Hagar re next steps	295.00	0.20	59.00
03/26/2023	RT	Respond to email from Cordova, Hagar re next steps	295.00	0.10	29.50
03/27/2023	RT	Respond to email from Cordova, Hagar re next steps	295.00	0.10	29.50
03/28/2023	RT	Respond to email from Cordova, Hagar re next steps	295.00	0.10	29.50
04/06/2023	RT	Zoom meeting with Hagar, Cordova re next steps, strategy issues	295.00	0.80	236.00
	RT	Respond to email from Schultz re discovery issues, next steps in settlement discussions	295.00	0.20	59.00
04/14/2023	RT	Telecon with Cordova, Hagar re next steps, strategy issues	295.00	1.10	324.50
04/18/2023	RT	Emails to/from Cordova, Hagar re next steps	295.00	0.30	88.50
04/20/2023	RT	Email to Cordova re next steps	295.00	0.10	29.50
04/21/2023	RT	Met with potential new class rep and Cordova re class rep duties, whether she wants to be class rep	295.00	0.60	177.00
	RT	Emails to/from Cordova re class rep issues	295.00	0.10	29.50
04/24/2023	RT	Teleconference with Cordova and 2nd potential new class rep re class rep duties, whether she wants to be class rep	295.00	0.50	147.50
04/25/2023	RT	Texts + emails to/from Cordova re next steps	295.00	0.30	88.50
04/26/2023	RT	Respond to email from Cordova re logistics with reply in support of motion to compel F+B	295.00	0.10	29.50
04/29/2023	RT	Work on reply in support of motion to compel F&B	295.00	3.80	1,121.00
04/30/2023	RT	Work on reply in support of motion to compel F&B	295.00	2.20	649.00

co-counsel with NMCLP

			Rate	Hours	
05/10/2023	RT	Email to team re logistics with 7/10 hearing	295.00	0.10	29.50
05/12/2023	RT	Email to team re contact from someone perhaps in damages sub-class	295.00	0.10	29.50
05/22/2023	RT	Respond to email from Cordova re next steps	295.00	0.10	29.50
05/23/2023	RT	Emails to/from Cordova re review of docs produced by LCMC	295.00	0.20	59.00
05/26/2023	RT	Respond to email from Cordova re issues with LCMC's production, next steps	295.00	0.50	147.50
	RT	Respond to email from Schultz re LCMC's production, settlement possibilities	295.00	0.10	29.50
05/30/2023	RT	Email to Cordova re next steps	295.00	0.10	29.50
06/02/2023	RT	Emails to/from Cordova re next steps	295.00	0.30	88.50
06/05/2023	RT	Emails to/from Cordova re next steps	295.00	0.20	59.00
06/08/2023	RT	Zoom meeting with Cordova, Hagar re next steps	295.00	1.60	472.00
06/12/2023	RT	Emails to/from Cordova re setting up telcon w Schultz, Vanzi, possible settlement demand	295.00	0.30	88.50
06/21/2023	RT	Legal research on whether class could obtain 2 awards of FDCPA statutory damages if we joined PASI	295.00	0.80	236.00
	RT	Telecon with Cordova, Hagar re next steps, framing up structure of class settlement in anticipation of call abt class settlement with LCMC counsel	295.00	1.10	324.50
	RT	Work on proposed email re class settlement proposal to send to LCMC attorneys; send same to Hagar and Cordova for their input	295.00	1.30	383.50
06/22/2023	RT	Email to Cordova, Hagar re settlement structure to suggest to LCMC counsel	295.00	0.10	29.50
	RT	Email to LCMC counsel re settlement possibilities	295.00	0.20	59.00
06/26/2023	RT	Telecon w/ Schultz, Vanzi re settlement possibilities	295.00	0.40	118.00
	RT	Quick telephonic debrief w/ and emails to/from Hagar, Cordova re telecon w/ LCMC counsel, next steps	295.00	0.20	59.00
	RT	Email to F&B counsel re settlement possibilities; call from Padilla re same	295.00	0.30	88.50
06/27/2023	RT	Call with Hagar re 7/10 hearing	295.00	0.40	118.00
	RT	Respond to email from Padilla re settlement possibilities	295.00	0.10	29.50
06/28/2023	RT	Respond to email from Cordova re documents concerning garnishment of damages class rep	295.00	0.10	29.50
07/05/2023	RT	Respond to email from Hagar re F+B's request that hearing on MTC F+B be vacated	295.00	0.20	59.00

co-counsel with NMCLP

			Rate	Hours	
07/06/2023	RT	Respond to email from Hagar re F+B's request that hearing on MTC F+B be vacated	295.00	0.10	29.50
07/11/2023	RT	Emails to/from Hagar, Cordova re debrief on 7/10 hearing	295.00	0.20	59.00
07/12/2023	RT	Review proposed order from 7/10 hearing, emails to/from Cordova re same	295.00	0.40	118.00
07/13/2023	RT	Emails to/from Cordova re proposed order from 7/10 hearing	295.00	0.20	59.00
07/14/2023	RT	Return call to Padilla re settlement possibilities	295.00	0.20	59.00
07/21/2023	RT	Call to F+B counsel re order on motion to compel	295.00	0.10	29.50
	RT	Call from Hagar, Cordova re next steps	295.00	0.10	29.50
07/24/2023	RT	Teleconference with attorneys for F+B re order from 7/10 hearing	295.00	0.50	147.50
	RT	Review Defs' settlement counterproposal, research implicated legal issues, make notes on possible response, email to and telecon with Cordova, Hagar re same	295.00	0.90	265.50
	RT	Telecon w/ Hagar + Cordova (Cordova had to go before end) re F+B's proposed order, response to Def's settlement counterproposal	295.00	0.50	147.50
	RT	Email to defense counsel re settlement possibilities	295.00	0.10	29.50
08/07/2023	RT	Teleconference with Hagar, Cordova re response to Def's settlement counterproposal	295.00	0.60	177.00
08/09/2023	RT	Work on reply to LCMC/Faber & Brand's counterproposal to our settlement demand	295.00	0.50	147.50
08/11/2023	RT	Email to opposing counsel re reply to Defendants' settlement counterproposal	295.00	0.20	59.00
08/16/2023	RT	Respond to email from Schultz re possible settlement terms	295.00	0.10	29.50
08/24/2023	RT	Respond to email from team re what to do in light of Court not yet entering order on MTC F+B	295.00	0.10	29.50
	RT	Work on motion for presentment (MTC F&B)	295.00	0.60	177.00
	RT	Emails to/from opposing counsel re motion for presentment (MTC F&B)	295.00	0.30	88.50
08/29/2023	RT	Call from Padilla re motion for presentment, settlement negotiations	295.00	0.20	59.00
08/31/2023	RT	Email to F+B counsel re motion for presentment	295.00	0.20	59.00
09/01/2023	RT	Respond to email from team re Defendants' latest counterproposal	295.00	0.10	29.50
09/05/2023	RT	Email to team re Defendants' latest counterproposal	295.00	0.10	29.50
09/06/2023	RT	Review prior back-and-forth to identify all matters that remain sticking points in settlement talks	295.00	0.90	265.50

co-counsel with NMCLP

			Rate	Hours	
	RT	Teleconference with and emails to/from Hagar, Cordova re settlement strategy	295.00	0.70	206.50
	RT	Email to opposing counsel re working through settlement sticking points	295.00	0.20	59.00
09/07/2023	RT	Work on motion for presentment	295.00	0.10	29.50
	RT	Emails to/from opposing counsel re setting up zoom meeting to continue settlement talks	295.00	0.20	59.00
09/08/2023	RT	Respond to email from Hagar re potential injunctive relief provisions	295.00	0.10	29.50
09/13/2023	RT	Email to Hagar, Cordova re logistics w 10/4 presentment hearing	295.00	0.10	29.50
09/22/2023	RT	Respond to email from Hagar, Cordova re injunctive relief issues	295.00	0.10	29.50
09/26/2023	RT	Email to team re injunctive relief issues	295.00	0.10	29.50
09/28/2023	RT	Email to team re injunctive relief issues	295.00	0.10	29.50
10/04/2023	RT	Emails to from Hagar re what happened at today's presentment hearing	295.00	0.20	59.00
10/10/2023	RT	Respond to email from Cordova re discuss issues before telecon w/ opposing counsel	295.00	0.10	29.50
10/11/2023	RT	Prep for zoom meeting with opposing counsel re settlement terms, including zoom meeting with Hagar, Cordova	295.00	1.10	324.50
	RT	Zoom meeting w/ Padilla, Schultz, Vanzi, Hagar, Cordova re settlement terms	295.00	0.08	23.60
10/23/2023	RT	Respond to email from Cordova re next steps	295.00	0.10	29.50
10/24/2023	RT	Respond to email from Padilla re F&B's request for extension on deadline to provide supp responses; potential settlement terms	295.00	0.30	88.50
11/02/2023	RT	Email to team re how to respond to Faber & Brand's 2nd request for extension on deadline to provide supp responses	295.00	0.50	147.50
11/03/2023	RT	Respond to email from Schultz re settlement terms	295.00	0.10	29.50
	RT	Review language proposed by LCMC/Faber & Brand re sticking points w settlement terms	295.00	0.20	59.00
	RT	Zoom meeting with Cordova, Hagar re next steps	295.00	2.10	619.50
11/09/2023	RT	Review and edit newly revised injunctive relief terms	295.00	0.30	88.50
11/10/2023	RT	Review counterproposal on injunctive relief provisions and draft letter re same; email to Cordova re same	295.00	0.20	59.00
11/14/2023	RT	Respond to email from Schultz re settlement terms	295.00	0.10	29.50
11/27/2023	RT	Call to Cordova re Faber & Brand's request for extension on court			

co-counsel with NMCLP

			Rate	Hours	
		ordered discovery	295.00	0.20	59.00
11/29/2023	RT	Emails to/from Cordova, Hagar re other side's latest proposal re injunctive relief, Faber + Brand's motion for extension	295.00	0.30	88.50
12/01/2023	RT	Telecon w Cordova, Hagar re next steps	295.00	0.40	118.00
	RT	Draft proposed email to Schultz/Vanzi re settlement terms and outline of additional tasks to complete; emails/calls to/from Cordova and Hagar re same	295.00	1.20	354.00
12/04/2023	RT	Respond to email from Cordove re next steps	295.00	0.10	29.50
	RT	Email to Schultz re settlement terms	295.00	0.20	59.00
	RT	Call from Schultz re next steps in settlement negotiations	295.00	0.20	59.00
	RT	Respond to email from Padilla where he asserts all Faber + Brand policies and procedures have been produced	295.00	0.20	59.00
	RT	Emails to/from Cordova re edits to protective order proposed by F+B	295.00	0.20	59.00
12/08/2023	RT	Respond to email from Cordova re addtl injunctive relief provisions needed for F+B policies	295.00	0.10	29.50
12/09/2023	RT	Work on response to Faber & Brand's motion to extend deadline	295.00	3.30	973.50
	RT	Email to team re draft response to Faber & Brand's motion to extend deadline	295.00	0.10	29.50
12/12/2023	RT	Respond to email from Cordova re his suggested edits to response to Faber & Brand's motion to extend deadline	295.00	0.10	29.50
	RT	Make edits to response to Faber & Brand's motion to extend deadline	295.00	0.20	59.00
12/21/2023	RT	Review and suggest edits w injunctive relief directed at F+B; email to Cordova re same	295.00	0.20	59.00
01/03/2024	RT	Review F+B's Reply in support of Motion to Extend Deadline	295.00	0.20	59.00
	RT	Respond to email from Cordova re injunctive relief directed at F+B	295.00	0.10	29.50
01/08/2024	RT	Respond to email from Cordova re injunctive relief directed at F+B	350.00	0.10	35.00
01/18/2024	RT	Email to Cordova, Hagar re logistics with new production by F+B	350.00	0.10	35.00
01/19/2024	RT	Legal research re F+B's argt they can rely on LCMC to determine indigency	350.00	0.30	105.00
	RT	Emails to/from Cordova, Hagar re responding to F+B's position that they can rely on LCMC for indigency determination	350.00	0.20	70.00
01/29/2024	RT	Emails to/from Cordova + Hagar re next steps	350.00	0.20	70.00
02/01/2024	RT	Zoom meeting with Cordova, Hagar re next steps w injunctive relief aimed at F+B	350.00	0.50	175.00
	RT	Respond to email from Quintero re vacating 2/13 hearing, status of injunctive relief provisions aimed at Faber + Brand	350.00	0.20	70.00

co-counsel with NMCLP

			Rate	Hours	
02/05/2024	RT	Respond to email from Schultz re he will be withdrawing due to his retirement	350.00	0.10	35.00
02/07/2024	RT	Emails to/from Quintero re vacating 2/13 hearing	350.00	0.20	70.00
02/27/2024	RT	Respond to email from Cordova re further tweaks to injunctive relief provisions	350.00	0.10	35.00
03/05/2024	RT	Respond to email from Faber & Brand counsel re proposed order that its motion for extension is now moot	350.00	0.10	35.00
03/15/2024	RT	Texts to/from and call from Cordova re next steps	350.00	0.20	70.00
03/19/2024	RT	Email to Hagar re next steps	350.00	0.30	105.00
03/20/2024	RT	Emails to/from opposing counsel re setting up time to further discuss injunctive relief terms	350.00	0.30	105.00
04/03/2024	RT	Emails to/from Hagar re prepping for tomorrow's teleconference	350.00	0.10	35.00
04/04/2024	RT	Call with Hagar before teleconference re proposal sent by LCMC counsel	350.00	0.20	70.00
	RT	Teleconference with LCMC counsel re injunctive relief sections	350.00	0.50	175.00
	RT	Email to all counsel re moving forward with settlement discussions	350.00	0.50	175.00
04/05/2024	RT	Respond to email string with all counsel re moving forward with settlement discussions	350.00	0.10	35.00
	RT	Emails to/from Hagar re next steps	350.00	0.20	70.00
04/16/2024	RT	Zoom conference with Hagar re sticking points w class settlement	350.00	0.50	175.00
04/17/2024	RT	Teleconference with Hagar and attorneys for LCMC + F+B re injunctive relief portions	350.00	1.30	455.00
04/22/2024	RT	Respond to email from Quintero re logistics with 4/25 zoom meeting	350.00	0.10	35.00
04/25/2024	RT	Respond to email from Stambaugh re logistics with meeting later today	350.00	0.10	35.00
	RT	Call with Hagar before zoom meeting with opposing counsel	350.00	0.20	70.00
	RT	Zoom meeting with Quintero, in-house counsel from Faber + Brand and Stambaugh	350.00	1.00	350.00
05/03/2024	RT	Respond to email from Hagar re newest proposal with F+B	350.00	0.40	140.00
05/07/2024	RT	Emails to/from and call to Hagar re putting off today's teleconference, need for more research	350.00	0.10	35.00
05/15/2024	RT	Texts to/from and call to Hagar re position to take on Faber + Brand injunctive relief provisions in tomorrow's telecon	350.00	0.40	140.00
05/16/2024	RT	Teleconference with Quintero, Stambaugh, Hagar re remaining			

co-counsel with NMCLP

			Rate	Hours	
		sticking points on injunctive relief provisions	350.00	0.40	140.00
	RT	Draft proposed joint email to Peifer and sent to opposing counsel for their review/comment	350.00	0.50	175.00
	RT	Email to Peifer re asking him for teleconference and then rule on injunctive relief sticking point	350.00	0.10	35.00
05/20/2024	RT	Email to Peifer and all counsel re logistics with initial teleconference	350.00	0.10	35.00
05/21/2024	RT	Email to Hager re logistics with telecon with Peifer	350.00	0.10	35.00
05/22/2024	RT	Legal research re Faber + Brand's argument of FD CPA preemption	350.00	0.20	70.00
05/23/2024	RT	Emails to/from Hager re logistics with telecon with Peifer	350.00	0.10	35.00
05/24/2024	RT	Email to Peifer and all counsel re setting up introductory telecon	350.00	0.30	105.00
05/28/2024	RT	Email to Peifer and all counsel re setting up introductory telecon	350.00	0.10	35.00
06/07/2024	RT	Initial telecon w Peifer re briefing schedule	350.00	0.30	105.00
	RT	Call to and emails to/from Hager re briefing logistics	350.00	0.30	105.00
06/17/2024	RT	Email to Hager re briefing logistics	350.00	0.10	35.00
06/18/2024	RT	Edit draft letter brief to Peifer	350.00	0.90	315.00
	RT	Email to Hager re letter brief	350.00	0.10	35.00
06/21/2024	RT	Email to Hager re letter brief logistics	350.00	0.10	35.00
06/23/2024	RT	Review Faber + Brand's letter brief to Peifer	350.00	0.10	35.00
06/26/2024	RT	Review and edit letter response brief	350.00	0.40	140.00
	RT	Email to Hager re letter response brief	350.00	0.10	35.00
07/10/2024	RT	Respond to email from Hager re next steps	350.00	0.10	35.00
07/29/2024	RT	Respond to email from Hager re next steps	350.00	0.10	35.00
08/01/2024	RT	Call and email to Hager re settlement pleadings, draft settlement agreement	350.00	0.40	140.00
08/12/2024	RT	Review and edit draft settlement agreement	350.00	1.30	455.00
	RT	Email to Hager re draft settlement agreement	350.00	0.10	35.00
08/15/2024	RT	Review proposed Notice and other exhibits to proposed class settlement agreement; emails to/from Hager re same	350.00	0.40	140.00
09/06/2024	RT	Email to Hager re next steps	350.00	0.10	35.00
09/07/2024	RT	Edits to joint motion for preliminary approval	350.00	0.40	140.00
	RT	Work on affidavit in support of motion for preliminary approval	350.00	0.50	175.00
	RT	Emails to Hager re joint motion for preliminary approval	350.00	0.20	70.00
	RT	Research into current hourly rates for NM consumer law attorneys	350.00	0.10	35.00

co-counsel with NMCLP

			Rate	Hours	
09/10/2024	RT	Emails to/from Hager re amount of fees/costs to list in Notice	350.00	0.10	35.00
09/13/2024	RT	Email/call to Hager re fees issue brought up by LCMC counsel	350.00	0.40	140.00
	RT	Respond to email from Stambaugh re fees issue	350.00	0.10	35.00
09/16/2024	RT	Email to Hager re logistics w reviewing LCMC's edits to proposed settlement docs	350.00	0.10	35.00
09/17/2024	RT	Respond to email from Hager re LCMC's suggested revisions to proposed settlement agreement and settlement pleadings	350.00	0.10	35.00
10/09/2024	RT	Respond to email from Hager re next steps	350.00	0.10	35.00
10/14/2024	RT	Email to Hager re suggested email to counsel for F&B re next steps	350.00	0.30	105.00
10/15/2024	RT	Emails to/from Quintero re proposed settlement agreement and settlement pleadings	350.00	0.20	70.00
10/22/2024	RT	Emails to/from Quintero re proposed settlement agreement and settlement pleadings	350.00	0.20	70.00
	RT	Call from Hager re next steps	350.00	0.10	35.00
10/23/2024	RT	Call from and emails to/from Hager re next steps	350.00	0.40	140.00
	RT	Legal research re broad releases to class members	350.00	0.40	140.00
10/25/2024	RT	Email to Hager re logistics with paying bill from Peifer	350.00	0.10	35.00
11/05/2024	RT	Email to Hager re motion to reinstate	350.00	0.10	35.00
11/22/2024	RT	Emails to/from Hager re class settlement agreement issues	350.00	0.20	70.00
12/05/2024	RT	Respond to email from Hager re class settlement logistics	350.00	0.10	35.00
12/18/2024	RT	Emails to/from all counsel re when expect signatures on approved settlement agreement	350.00	0.30	105.00
01/08/2025	RT	Respond to email from Hager re next steps	350.00	0.20	70.00
01/13/2025	RT	Respond to email from Hager re next steps	350.00	0.10	35.00
01/23/2025	RT	Email to Hager re next steps	350.00	0.10	35.00
01/29/2025	RT	Return call to Hager re what to do in light of evidence from class member that shows damages chart provided by Defs may be inaccurate	350.00	0.20	70.00
01/30/2025	RT	Emails to/from and call from Hager re possible issues with Def's actual damage calculations	350.00	0.90	315.00
02/13/2025	RT	Call with and emails to/from Hager re possible issues with Def's actual damage calculations	350.00	0.40	140.00

co-counsel with NMCLP

			Rate	Hours	
02/20/2025	RT	Emails to/from Hager re next steps	350.00	0.10	35.00
02/25/2025	RT	Texts to/from Hager re next steps	350.00	0.20	70.00
02/26/2025	RT	Call from and emails to/from Hager re next steps	350.00	0.30	105.00
02/28/2025	RT	Respond to email from Hager re possible issues with actual damage calculations	350.00	0.10	35.00
03/05/2025	RT	Call to Hager re next steps	350.00	0.20	70.00
04/02/2025	RT	Emails to/from Hager re next steps	350.00	0.10	35.00
04/03/2025	RT	Contact ALCS re obtaining a quote for class administration	350.00	0.20	70.00
	RT	Email to Hager re next steps	350.00	0.10	35.00
04/07/2025	RT	Revise my affidavit to be attached to joint motion for approval of class action settlement	350.00	0.30	105.00
	RT	Emails to/from Hager re joint motion for approval of class action settlement	350.00	0.10	35.00
04/08/2025	RT	Emails and call to ALCS re using them as class admin	350.00	0.50	175.00
04/09/2025	RT	Emails to/from ALCS re what is needed for class administration	350.00	0.20	70.00
	RT	Emails to/from Hager re responding to Court re its questions about prelim approval order	350.00	0.10	35.00
04/10/2025	RT	Email to opposing counsel re logistics for payments to set up class fund	350.00	0.10	35.00
04/11/2025	RT	Emails to/from Hager re F+B's failure to respond to Court's request for deadline doe Defendants' payments to class administrator	350.00	0.10	35.00
04/15/2025	RT	Emails to/from ALCS re quote	350.00	0.40	140.00
	RT	Review ALCS proposal	350.00	0.10	35.00
	RT	Email to Hager re ALCS proposal	350.00	0.20	70.00
04/21/2025	RT	Emails to/from Pirrung at ALCS re admin logistics	350.00	0.20	70.00
04/23/2025	RT	Telecon with Pirrung at ALCS re admin logistics	350.00	0.30	105.00
	RT	Respond to email from Stambaugh re logistics with settlement	350.00	0.10	35.00
04/24/2025	RT	Emails to/from Hager re next steps	350.00	0.20	70.00
	RT	Emails to/from Pirrung + others at ALCS + counsel re admin of settlement	350.00	0.50	175.00
04/29/2025	RT	Respond to email from Hager re logistics with fee petition	350.00	0.20	70.00
05/04/2025	RT	Review draft notice prepared by ALCS	350.00	0.20	70.00
	RT	Email to Hager re draft notice prepared by ALCS	350.00	0.10	35.00

co-counsel with NMCLP

			Rate	Hours	
05/05/2025	RT	Work on fee petition	350.00	2.00	700.00
05/06/2025	RT	Work on fee petition	350.00	3.40	1,190.00
	RT	Email to Hager re fee petition	350.00	0.20	70.00
	RT	Estimate of additional time needed to coordinate settlement logistics with the class administrator, work with opposing counsel to effectuate the settlement and obtain Court approval of the settlement, answer questions from class members once Notice is provided, and attend the Settlement Hearing	350.00	5.00	1,750.00
		For Current Services Rendered		<u>131.38</u>	<u>40,825.10</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Rob Treinen	131.38	\$310.74	\$40,825.10

Sales Tax on Services 3,112.91

Advances

10/11/2022	(miscellaneous advance) Filing EOA	9.00
10/13/2022	(miscellaneous advance) Issuance of Summons - Faber & Brand	9.00
10/21/2022	(miscellaneous advance) Service of Summons - Faber & Brand	55.00
10/24/2022	(miscellaneous advance) filing ROS - Faber & Brand	13.00
11/08/2022	(miscellaneous advance) Service to Faber & Brand - Copy of TRO	55.00
12/21/2022	(miscellaneous advance) Filing COS - First set of Discovery to Defs	13.00
02/27/2023	(miscellaneous advance) Filing COS Responses to LCMC and F&B 1st set of discovery	13.00
03/28/2023	(miscellaneous advance) Filing MTC F&B	13.00
05/02/2023	(miscellaneous advance) Filing Reply iso MTC F&B, RFH, NTC	13.00
05/02/2023	(miscellaneous advance) Filing Reply iso of MTC F&B, NTC Completion, RFH	13.00
08/29/2023	(miscellaneous advance) Fees/Costs Court Reporter- 7/10 Hearing Transcript	209.34
09/07/2023	(miscellaneous advance) Filing Joint Motion for Presentment re MTC F&B	9.00
09/07/2023	(miscellaneous advance) Filing RFH - Order on MTC F&B	13.00
12/15/2023	(miscellaneous advance) Filing Opp. to F&B Mtn to Extend Deadline	9.00
10/25/2024	(miscellaneous advance) Arbitrator Fees/Costs - Peifer	723.64

Total Advances 1,169.98

Total Current Work 45,107.99

Balance Due \$45,107.99

STATE OF NEW MEXICO
THIRD JUDICIAL DISTRICT COURT
COUNTY OF DONA ANA

Exhibit B

LAS CRUCES MEDICAL CENTER, LLC, dba
MOUNTAIN VIEW REGIONAL MEDICAL CENTER,
Plaintiff,

vs.

Case No. D-307-CV-2022-01051
Judge: CASEY B. FITCH

RUBY RAMIREZ,
Defendant.

RUBY RAMIREZ,
on behalf of herself and other
individuals similarly situated,
Counterclaim Plaintiff,

vs.

LAS CRUCES MEDICAL CENTER, LLC, dba
MOUNTAIN VIEW REGIONAL MEDICAL CENTER;
and FABER & BRAND, LLC,
Counterclaim Defendants.

DECLARATION OF SOVEREIGN HAGER

I, Sovereign Hager, declare under penalty of perjury:

1. I am a licensed attorney in New Mexico and a member in good standing of the New Mexico bar. I am employed as the Legal Director at the New Mexico Center on Law and Poverty (“NMCLP”) and I serve as co-counsel for Plaintiffs in the present lawsuit. I have personal knowledge of the matters set forth in this Declaration, and, if called as a witness, I could and would competently so testify. I make this Declaration in support of Plaintiffs’ Application in Support of Class Representative Incentives and Attorneys’ Fees.

Background and Experience of NMCLP’s Attorneys

2. NMCLP is a 501(c)(3) nonprofit organization dedicated to advancing economic and social justice through education, advocacy, and litigation. NMCLP works with low-income New

Mexicans to improve living conditions, increase opportunities, and protect their rights. NMCLP provides systemic advocacy to advance economic justice and equal opportunities for families in New Mexico.

3. NMCLP was established in 1996 to fill a critical gap in the provision of systemic civil legal services in New Mexico. Since NMCLP's early victories to protect access to public benefits programs, it expanded its expertise and deepened its skills to represent low-income New Mexicans in the courts, at the legislature, and before state agencies and institutions. Today, NMCLP is a critical anchor institution for systemic change in New Mexico. NMCLP's legal and policy work protects the rights of New Mexicans and creates positive changes in laws, programs, and policies across a broad range of issues that deeply affect the well-being of New Mexicans. Extensive background information on NMCLP is available on its website at www.NMPovertyLaw.org.

4. NMCLP was and remains uniquely situated to bring this lawsuit. Among other nonprofit legal services organizations, NMCLP is among few in New Mexico with the ability to bring class action lawsuits. Other organizations such as New Mexico Legal Aid are prohibited from this type of litigation due to the restrictive nature of their federal funding sources. Furthermore, NMCLP has unique expertise in the New Mexico Patient's Debt Protection Act because NMCLP attorneys Sovereign Hager and Nicolas Cordova served as experts on the legislation before the NM Legislature.

5. In addition to being unique among nonprofit legal services providers, NMCLP is also unique in the context of the New Mexico state bar with regard to the experience and expertise in these types of legal issues. NMCLP and co-counsel regularly represent New Mexicans in class actions and other impact litigation seeking systemic reform to systems and institutions. This

includes representing the plaintiffs in *Yazzie v. Hanna Skandera*, D-101-CV-2014-00793 (finding the New Mexico education system insufficient under the New Mexico Constitution), *Rodriguez v. Brand West Dairy*, S-1-SC-35426 (finding the exclusion of agricultural workers from workers' compensation to violate the New Mexico Constitution), *Knowlton v. Armijo*, 88-CV-038 (entering a class action consent decree requiring the New Mexico Healthcare Authority to comply with federal law in the administration of food and medical assistance and resulting in numerous rulings requiring reforms to food and medical assistance administration), *Olivas v. Nair*, D-101-CV-2017-00139 (resulting in a class action settlement agreement requiring the New Mexico Department of Workforce Solutions ("NMDWS") to accept and investigate wage claims as required by state law), *Coss v. Manafort*, D-1010-CV-2018-00302 (resulting in a settlement requiring the New Mexico Motor Vehicle Department to revise regulations and provide second-tier drivers' licenses to New Mexicans as required by state statutes), *NMCLP v. Sidonie Squier*, D-101-CV-2014-02330 (enjoining the New Mexico Human Services Department from implementing work requirements as a condition of food assistance eligibility), *Torres v. Jacobson*, D-101-CV-2018-02769 (entering a consent decree requiring the New Mexico Early Childhood Education and Care Department to increase eligibility for child care assistance and provide due process in the program application requirements), *Atyani v. Bonfantine*, D-202-CV-2016-02775 (resulting in a class action settlement requiring an employer to comply with the City of Albuquerque minimum wage ordinance and pay close to \$1 million in damages to workers), and *Duran et. al v. Nair*, D-101-CV-2023-00698 (resulting in over \$100,000,000 in unemployment overpayments being waived or refunded to New Mexicans).

SOVEREIGN HAGER

6. I am an attorney licensed to practice law in the state of New Mexico and in the United States District Court for the State of New Mexico as well as the United States Court of Appeals for the Tenth Circuit. I have been a practicing attorney since 2011 and received my J.D. and M.A. from Syracuse University.

7. Immediately following law school, I worked as a staff attorney for the Medical Legal Partnership at Dinébe'iiná Náhiina be Agha'diit'ahii- "DNA" - People's Legal Services from 2012 to 2013, providing comprehensive civil legal services to low-income patients and their families at a Navajo Area Indian Health Service hospital and two rural clinics. I represented clients in state and tribal court on issues including public benefits, domestic violence, special education rights, consumer rights and family law. I also provided legislative testimony on healthcare access for Navajo Nation members in New Mexico.

8. I have been an attorney at the New Mexico Center on Law and Poverty since 2013, and has served as the Legal Director with NMCLP since 2018. I represented low-income New Mexicans in impact cases protecting rights to drivers' licenses (*Coss v. Manafort*, D-1010-CV-2018-00302), food assistance (*NMCLP v. Sidonie Squier*, D-101-CV-2014-02330), and child care assistance (*Torres v. Jacobson*, D-101-CV-2018-02769). I currently serve as class counsel in *Knowlton v. Armijo*, 88-CV-038, *Olivas v. Nair*, D-101-CV-2017-00139, and *Duran v. Nair*, D-101-CV-2023-00698. As Legal Director, I oversee the legal work of NMCLP, including workers' rights, housing, access to public benefits, access to Medicaid and healthcare, and enforcing the state's obligation to provide a sufficient education to public school students.

9. I also provide technical assistance, support, and training to attorneys and advocates on legal rights in income and food support programs. Her publications include: "Practical Changes State Agencies Can Make to Increase Equity in Application Processes for Immigrant Families,"

December 2020, CENTER FOR LAW AND SOCIAL POLICY; “What does Due Process Mean for Notices,” CLEARINGHOUSE REVIEW, February 2016; “Farm Workers and Forced Labor; Why the United States Should Include Agricultural Guest workers in the Migrant and Seasonal Worker Protection Act,” 38 SYRACUSE J INT’L L & COM. 173 (2010).

10. I have experience leading complex litigation, including large class action cases in state and federal court and other complex cases against employers, hospitals, and corporations in New Mexico and on the Navajo Nation.

NICOLAS CORDOVA

11. Nicolas Cordova is an attorney licensed to practice law in New Mexico. Mr. Cordova has been a practicing attorney since 2018. Mr. Cordovan received his J.D. in 2018 from University of Colorado Law School. Immediately following law school, Mr. Cordova worked as a Judicial Law Clerk and then Senior Law Clerk for the Honorable Judge Julie J. Vargas of the New Mexico Court of Appeals.

12. Mr. Cordova joined NM CLP as an attorney focusing on health care access in October of 2020. From November of 2022 to April of 2024, Mr. Cordova was the Director of NMLCP’s health care access work.

Requested Rates

13. The hourly billing rates for NMCLP attorneys that performed work in this matter are as follows:

Timekeeper	Position	Law School Class	Rate
Sovereign Hager	Attorney	2011	\$300
Nicolas Cordova	Attorney	2018	\$250

14. These hourly rates are reasonable and for attorneys in New Mexico with similar experience and accomplishments. In fact, we were recently awarded significantly higher rates than we are seeking in this case. NMCLP was awarded fees for my work at \$400 an hour in *Duran et. al. v. Nair*, D-101-CV-2023-00698 and an NMCLP attorney of similar experience to Mr. Cordova was awarded \$300 an hour in that case (Order filed 12/10/2024).

WORK BY NMCLP ATTORNEYS ON BEHALF OF PLAINTIFFS

15. NMCLP attorneys listed above have expended a substantial amount of time in this matter. Litigation activities completed to date include investigating the claims, conducting outreach to community groups serving individuals impacted by unlawful medical debt collections, identifying and meeting with class members and the class representative, locating and reviewing litigation filed by Defendants to collect on medical debt, drafting the counterclaim Plaintiff's class action complaint, filing, reviewing discovery and litigating discovery disputes, briefing, arguing and negotiating a pause to the filling of collections actions filed against prospective class members. NMCLP began these activities in 2022 and has worked consistently on this matter ever since, in close collaboration with Ms. Ramirez, the named Plaintiff.

16. Since beginning work on this case nearly three years ago, NMCLP attorneys have worked vigorously to protect the interests of the named Plaintiffs and the class members we represent. NMCLP attorneys have spoken to dozens of class members, produced materials to inform New Mexicans who have low income about their rights to protection from medical debt litigation, and engaged with New Mexicans who were organizing to address barriers to healthcare access caused by medical debt.

17. NMCLP attorneys on this case regularly met with the class representative throughout the litigation and settlement process. This included hours of telephonic and zoom

meetings, review of documents, pleadings, preparation of discovery responses and discussion of settlement terms.

18. While settlement negotiations began very early, the negotiations were difficult and protracted for several reasons. Negotiations and collaboration on remedies between Defendants and Plaintiffs, including the details of injunctive relief took several months to negotiate with each Defendant. During this period of litigation and negotiation on this case, NMCLP was unable to take on any other litigation related to healthcare in New Mexico.

19. I believe that the Settlement Agreement reached in this case provides an excellent result for our clients, who will have lawsuits filed against them dismissed, \$625 in statutory damages and most if not, all amounts paid to Defendants returned in actual damages. Additionally, the injunctive relief agreed to in this case requires substantive changes to the collection practices of the defendant hospital and their debt collectors to ensure they comply with New Mexico law and prevent further unlawful collections actions from being filed against low-income New Mexicans.

NMCLP Billing Practices in this Litigation

1. NMCLP has experience keeping time and submitting time records for fee awards. We use case management software that contemporaneously tracks time spent working on each matter and maintains these time records in the regular course of business. Timekeepers at NMCLP are expected to make a record of the work they do at or near the time the work is completed. Our software tracks time to the tenth of an hour.

2. To track time in this case, NMCLP created a separate matter in its timekeeping software associated with this matter. I recorded my time contemporaneously. All staff working on this

matter were directed to create contemporaneous entries that track the date work was completed, the hours spent working on the matter, the timekeeper's name, and a description of the work.

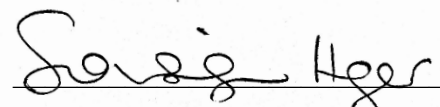
3. While staff made their best effort to accurately track all the time spent on this matter, they sometimes failed to track time spent taking phone calls about the case, discussing the matter internally, or reading or responding to emails. This work is not shown on NMCLP's time records and NMCLP is claiming no compensation for such time.

4. A true and accurate copy of NMCLP's billing records is attached to this affidavit.

5. In total, NMCLP spent 301.1 hours working on this case. This figure includes an estimated five additional hours for the additional time needed to coordinate settlement logistics with the class administrator, work with opposing counsel to effectuate the settlement and obtain Court approval of the settlement, answer questions from class members once Notice is provided, and attend the Settlement Hearing. These fees were accrued to advance this lawsuit to its successful conclusion.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 8, 2025



Sovereign Hager

NM Center on Law and Poverty Billing Records - LCMC v. Ramirez

Billed By	Description	Date	Hours Worked	Rate	Total
Nicolas Cordova	Call with class member re medical debt case	8/3/2022	0.20	250.00	50
Nicolas Cordova	Draft class action complaint	8/3/2022	3.60	250.00	900
Nicolas Cordova	Revise class complaint	8/4/2022	1.20	250.00	300
Nicolas Cordova	Edit class action complaint	8/6/2022	0.60	250.00	150
Nicolas Cordova	Edit class action complaint	8/7/2022	1.70	250.00	425
Nicolas Cordova	Revise class action complaint	8/9/2022	1.40	250.00	350
Nicolas Cordova	Revise class action complaint	8/11/2022	1.10	250.00	275
Nicolas Cordova	Revise class action complaint	8/12/2022	0.30	250.00	75
Sovereign Hager	Reviewed and edited complaint.	8/12/2022	0.60	300.00	180
Nicolas Cordova	Edit class action complaint	8/16/2022	1.30	250.00	325
Sovereign Hager	Email with cocounsel re potential plaintiffs.	8/31/2022	0.60	300.00	180
Nicolas Cordova	Work on complaint for class action	9/8/2022	0.40	250.00	100
Nicolas Cordova	Revise class action complaint	9/9/2022	0.50	250.00	125
Nicolas Cordova	Edit class action complaint	9/12/2022	1.20	250.00	300
Sovereign Hager	Mtg with cocounsel.	9/14/2022	0.50	300.00	150
Sovereign Hager	Rep agreement and co counsel agreement finalization emails w/NC	9/16/2022	0.40	300.00	120

Sovereign Hager	Emails with NC and research on service rules to determine deadlines for filing counterclaims	9/19/2022	0.50	300.00	150
Nicolas Cordova	Research procedural issue for counterclaim class action	9/21/2022	0.20	250.00	50
Nicolas Cordova	Meeting re MV class action strategy	9/26/2022	0.80	250.00	200
Nicolas Cordova	Edit MV class action complaint	9/26/2022	0.30	250.00	75
Sovereign Hager	Meet with co counsel	9/26/2022	0.80	300.00	240
Nicolas Cordova	Meeting with Class Rep.	9/27/2022	0.40	250.00	100
Sovereign Hager	Call with co counsel and class rep.	9/27/2022	0.40	300.00	120
Nicolas Cordova	Edit class action complaint	9/29/2022	0.50	250.00	125
Nicolas Cordova	mtg with SH re strategy	9/30/2022	0.70	250.00	175
Sovereign Hager	mtg with NC re strategy	9/30/2022	0.70	300.00	210
Nicolas Cordova	Draft TRO application for MV case	10/2/2022	0.30	250.00	75
Nicolas Cordova	Revise class action complaint	10/4/2022	0.60	250.00	150
Nicolas Cordova	Revise TRO application for class action	10/5/2022	0.90	250.00	225
Nicolas Cordova	Mtg with Cocounsel.	10/6/2022	0.90	250.00	225
Nicolas Cordova	Revise motion for TRO	10/7/2022	0.40	250.00	100
Nicolas Cordova	Call w SH	10/7/2022	0.10	250.00	25
Sovereign Hager	Edits to letter and proposed stipulation, discussed with NC	10/7/2022	2.00	300.00	600
Nicolas Cordova	Revise MV class action complaint	10/8/2022	0.20	250.00	50
Nicolas Cordova	Revise MV class action complaint	10/9/2022	2.60	250.00	650

Nicolas Cordova	Revise MV complaint	10/10/2022	2.90	250.00	725
Nicolas Cordova	Legal team mtg.	10/10/2022	0.40	250.00	100
Sovereign Hager	Mtg with co counsel.	10/10/2022	0.40	300.00	120
Sovereign Hager	Emails with co counsel, coordinated service of Defendants.	10/12/2022	0.60	300.00	180
Nicolas Cordova	Mtg re Mountain View TRO motion	10/14/2022	0.20	250.00	50
Nicolas Cordova	Call with CHS attorney re class action	10/14/2022	0.10	250.00	25
Sovereign Hager	Discussed calls with NC from other class members	10/14/2022	0.60	300.00	180
Nicolas Cordova	Work on Mountain View TRO motion	10/16/2022	1.20	250.00	300
Nicolas Cordova	Revise tro application; meeting re application	10/17/2022	0.90	250.00	225
Nicolas Cordova	Call w MV attorney re case; call w legal team re TRO	10/18/2022	0.30	250.00	75
Sovereign Hager	emails and edits to TRO motion, review declarations	10/18/2022	2.30	300.00	690
Nicolas Cordova	Edit TRO for MV case	10/19/2022	0.80	250.00	200
Sovereign Hager	Review declaration additions.	10/20/2022	0.50	300.00	150
Nicolas Cordova	Call w class member re declaration	10/21/2022	0.30	250.00	75
Nicolas Cordova	Work on TRO declarations	10/21/2022	0.60	250.00	150
Nicolas Cordova	Call w class member re declaration	10/21/2022	0.50	250.00	125
Sovereign Hager	Research re TRO.	10/22/2022	0.80	300.00	240
Sovereign Hager	Confer with NC re declarations and TRO.	10/24/2022	0.60	300.00	180
Sovereign Hager	Edits to TRO brief.	10/28/2022	2.00	300.00	600

Sovereign Hager	Final edits to TRO, and discuss same with NC	11/1/2022	1.60	300.00	480
Nicolas Cordova	Call with SH re strategy on TRO.	11/3/2022	0.90	250.00	225
Sovereign Hager	Discuss putative class member referral w/ NC	11/8/2022	0.50	300.00	150
Nicolas Cordova	Review reply to counterclaim	11/14/2022	0.30	250.00	75
Sovereign Hager	Read Mntn View's reply	11/14/2022	0.80	300.00	240
Sovereign Hager	Confer with NC re filings.	11/16/2022	0.60	300.00	180
Nicolas Cordova	Communicate with class member re MV case	11/21/2022	0.10	250.00	25
Nicolas Cordova	Research for and draft reply to response to TRO motion	11/22/2022	0.90	250.00	225
Nicolas Cordova	Review Faber response to TRO motion	11/23/2022	0.70	250.00	175
Nicolas Cordova	Work on reply for TRO motion	11/27/2022	1.80	250.00	450
Nicolas Cordova	Work on reply for TRO motion	11/28/2022	4.10	250.00	1025
Sovereign Hager	Read TRO response from F & B.	11/28/2022	0.60	300.00	180
Sovereign Hager	Discuss reply brief with NC	11/29/2022	0.50	300.00	150
Nicolas Cordova	Review LCMC response to TRO motion	11/30/2022	1.10	250.00	275
Nicolas Cordova	Work on TRO reply	12/1/2022	4.30	250.00	1075
Nicolas Cordova	Strategy meeting re TRO reply	12/1/2022	0.80	250.00	200
Nicolas Cordova	Work on TRO reply	12/2/2022	8.60	250.00	2150
Sovereign Hager	Research for reply brief, emails with NC re the same.	12/2/2022	2.00	300.00	600
Nicolas Cordova	Work on TRO reply	12/3/2022	2.60	250.00	650

Sovereign Hager	Edit reply brief, meet with NC re the same.	12/3/2022	1.80	300.00	540
Nicolas Cordova	Edit TRO reply	12/5/2022	2.20	250.00	550
Nicolas Cordova	Met with cocounsel re TRO hearing.	12/5/2022	0.80	250.00	200
Sovereign Hager	Mtg to prep for TRO, review of final brief	12/5/2022	1.80	300.00	540
Nicolas Cordova	Work on TRO reply; prep for hearing	12/6/2022	4.60	250.00	1150
Nicolas Cordova	Prep for TRO hearing; argue TRO hearing	12/7/2022	3.10	250.00	775
Sovereign Hager	Attended TRO hearing.	12/7/2022	1.30	300.00	390
Sovereign Hager	Prep with NC for TRO hearing presentation.	12/7/2022	1.30	300.00	390
Sovereign Hager	Emails with legal team re contact with class members.	12/7/2022	0.60	300.00	180
Nicolas Cordova	Call with Rougeux re contact from hospital to putative class members	12/9/2022	0.20	250.00	50
Sovereign Hager	Review discovery	12/16/2022	1.20	300.00	360
Sovereign Hager	Discussed next steps in litigation with NC	1/5/2023	0.40	300.00	120
Nicolas Cordova	Meeting re discovery	1/10/2023	0.30	250.00	75
Sovereign Hager	Meet with co counsel.	1/10/2023	0.30	300.00	90
Nicolas Cordova	Review order	1/26/2023	0.30	250.00	75
Nicolas Cordova	Client call re discovery requests	2/3/2023	1.60	250.00	400
Nicolas Cordova	Read emails from counsel and gather documents from client	2/6/2023	0.10	250.00	25
Nicolas Cordova	Discovery review	2/8/2023	0.20	250.00	50
Sovereign Hager	Emails with cocounsel re discovery.	2/8/2023	0.40	300.00	120

Nicolas Cordova	Call with class member	2/20/2023	0.20	250.00	50
Nicolas Cordova	Speak with cocounsel re discovery documents and needed information	2/23/2023	0.20	250.00	50
Nicolas Cordova	Coordinate notary for discovery responses.	2/24/2023	0.10	250.00	25
Nicolas Cordova	Call w LCMC counsel re possible settlement	3/15/2023	0.50	250.00	125
Sovereign Hager	Call with opposing counsel.	3/15/2023	0.80	300.00	240
Nicolas Cordova	Review and make edits to Motion to Compel	3/24/2023	0.20	250.00	50
Nicolas Cordova	Speak with potential class members re litigation	4/4/2023	0.50	250.00	125
Nicolas Cordova	Legal team mtg re discovery and case next steps	4/6/2023	0.80	250.00	200
Nicolas Cordova	Research for LCMC case re HIPAA and discovery issue; review discovery	4/6/2023	0.90	250.00	225
Sovereign Hager	Reviewed questions from co counsel, met with co counsel.	4/6/2023	0.80	300.00	240
Nicolas Cordova	Research and draft memo for litigation re discovery	4/7/2023	1.20	250.00	300
Nicolas Cordova	Review discovery responses and response to motion to compel	4/11/2023	1.80	250.00	450
Nicolas Cordova	Call w class member; reviewed client docs.	4/11/2023	0.80	250.00	200
Nicolas Cordova	Research for discovery request (.5); finish memo on HIPAA and write to cocounsel re next steps (.5); talk to SH re next steps for protective order (.7)	4/11/2023	1.70	250.00	425
Sovereign Hager	Read F & B's response brief.	4/11/2023	0.60	300.00	180
Nicolas Cordova	Review collection documents received by class member; follow up re collection letters and communications w LCMC; draft email to cocounsel re the same.	4/12/2023	1.00	250.00	250

Nicolas Cordova	Research re discovery and review discovery	4/13/2023	0.30	250.00	75
Nicolas Cordova	Speak with class member	4/13/2023	0.60	250.00	150
Nicolas Cordova	Meeting re discovery and next steps w co-counsel	4/14/2023	1.40	250.00	350
Sovereign Hager	Mtg with cocounsel.	4/14/2023	1.20	300.00	360
Nicolas Cordova	Call with class member	4/17/2023	0.70	250.00	175
Nicolas Cordova	Review documents and send documents for review w named representative(2); write w co-counsel (.3); review qualified protective order samples and start drafting (2.5)	4/18/2023	4.80	250.00	1200
Sovereign Hager	Emails re class member phone calls	4/18/2023	0.40	300.00	120
Nicolas Cordova	Work on and research for protective order	4/19/2023	0.80	250.00	200
Nicolas Cordova	Speak w class member	4/19/2023	0.10	250.00	25
Nicolas Cordova	Revise protective order and motion (.8); write to cocounsel about case (.2); draft letter to correct garnishment issue (.6)	4/20/2023	1.60	250.00	400
Sovereign Hager	Review discovery	4/20/2023	0.80	300.00	240
Nicolas Cordova	Calls w class member, cocounsel, and named rep re case.	4/21/2023	0.80	250.00	200
Nicolas Cordova	Call w class member	4/24/2023	0.50	250.00	125
Nicolas Cordova	Draft letter to defendants re stopping garnishment actions.	4/24/2023	0.40	250.00	100
Sovereign Hager	Call to class rep.	4/24/2023	0.60	300.00	180
Nicolas Cordova	Revise garnishment letter for class members (.5); receive message for and look up case info for putative class member (.2)	4/25/2023	0.70	250.00	175

Sovereign Hager	Edit letter to LCMC, discuss w/ NC.	4/25/2023	0.60	300.00	180
Sovereign Hager	Review discovery briefing.	5/1/2023	0.80	300.00	240
Sovereign Hager	Call with class member.	5/12/2023	0.40	300.00	120
Nicolas Cordova	Review discovery	5/22/2023	1.50	250.00	375
Nicolas Cordova	Research for motion to compel hearing	5/23/2023	0.80	250.00	200
Nicolas Cordova	Review discovery	5/25/2023	2.10	250.00	525
Sovereign Hager	Reviewed supplemental discovery	5/25/2023	1.30	300.00	390
Nicolas Cordova	Speak with class rep re case	5/26/2023	1.00	250.00	250
Sovereign Hager	Emails w/ co counsel.	5/26/2023	0.40	300.00	120
Nicolas Cordova	Review discovery	5/30/2023	0.90	250.00	225
Nicolas Cordova	Review discovery and speak with class representative Ramirez re discovery issues (.4) edit and send garnishment letter to counsel (.8)	6/2/2023	1.20	250.00	300
Nicolas Cordova	Review discovery	6/5/2023	1.60	250.00	400
Nicolas Cordova	Review discovery	6/7/2023	0.80	250.00	200
Nicolas Cordova	Meeting with co-counsel re discovery	6/8/2023	1.60	250.00	400
Sovereign Hager	Mtg with Co counsel.	6/8/2023	1.60	300.00	480
Nicolas Cordova	Call with class rep	6/9/2023	0.40	250.00	100
Nicolas Cordova	Send follow-up email re settlement to opposing counsel	6/9/2023	0.40	250.00	100
Nicolas Cordova	Coordinate meeting for settlement negotiation.	6/12/2023	0.50	250.00	125

Sovereign Hager	Emails from opposing counsel and emails with co counsel regarding next meeting for settlement	6/12/2023	0.50	300.00	150
Nicolas Cordova	Meeting re settlement terms with SH	6/20/2023	0.70	250.00	175
Sovereign Hager	Met to discuss settlement terms with NC	6/20/2023	0.70	300.00	210
Nicolas Cordova	Meeting re settlement process; review and edit settlement proposal	6/21/2023	2.00	250.00	500
Sovereign Hager	Met with NC to discuss injunctive relief list.	6/21/2023	0.50	300.00	150
Sovereign Hager	Met with co counsel regarding the case and upcoming settlement discussions.	6/21/2023	1.10	300.00	330
Nicolas Cordova	Prep for and have settlement discussion with LCMC	6/26/2023	0.70	250.00	175
Nicolas Cordova	Meeting with class rep re case updates	6/27/2023	0.50	250.00	125
Sovereign Hager	Prepped for motion to compel hearing and met with co-counsel to discuss the briefs and argument.	6/27/2023	2.00	300.00	600
Nicolas Cordova	Call counsel re MTC hearing; speak with SH re discovery; review discovery responses for email to Faber & Brand	7/5/2023	1.70	250.00	425
Nicolas Cordova	Write to Counsel for Faber re MTC hearing	7/6/2023	0.10	250.00	25
Sovereign Hager	Meet with NC and discuss case, email with co counsel, emails from opposing counsel.	7/6/2023	0.50	300.00	150
Nicolas Cordova	Review discovery from LCMC	7/7/2023	0.20	250.00	50
Sovereign Hager	Prep for motion to compel hearing	7/9/2023	2.20	300.00	660
Nicolas Cordova	Attend hearing on motion to compel Faber & Brand; debrief for drafting proposed order; research for form and language used in and draft proposed order	7/10/2023	2.50	250.00	625

Sovereign Hager	Argued Motion to Compel.	7/10/2023	1.60	300.00	480
Nicolas Cordova	Draft proposed order for motion to compel Faber & Brand supplemental discovery response	7/11/2023	1.70	250.00	425
Nicolas Cordova	Review and revise draft order on motion to compel Faber	7/12/2023	0.60	250.00	150
Nicolas Cordova	Research re local rule for filing order on motion to compel and providing sufficient time to review draft order by opposing counsel	7/12/2023	0.30	250.00	75
Sovereign Hager	Edit proposed order.	7/12/2023	0.40	300.00	120
Sovereign Hager	Emails with opposing counsel re proposed order.	7/13/2023	0.40	300.00	120
Nicolas Cordova	Review settlement proposal response. Call w Faber counsel re proposed order on motion to compel.	7/21/2023	0.30	250.00	75
Nicolas Cordova	Calls with Faber counsel re proposed order on discovery;	7/24/2023	0.50	250.00	125
Sovereign Hager	Telecon with Faber& Brand re proposed Order on motion to compel, prepared and emailed competing versions to Court	7/24/2023	0.50	300.00	150
Sovereign Hager	Meeting with Co-counsel to discuss settlement proposal response from LCMC & Faber and Brand	7/24/2023	0.90	300.00	270
Nicolas Cordova	Research for LCMC settlement and potential injunctive relief drafting. Meeting re settlement response. Draft response to global response to settlement demand.	8/7/2023	2.30	250.00	575
Sovereign Hager	Call with co counsel about case.	8/7/2023	0.60	300.00	180
Nicolas Cordova	Call with class rep re updates in case and settlement talks;	8/9/2023	0.30	250.00	75

Nicolas Cordova	Write to cocounsel re settlement strategy meeting; review settlement memo	9/1/2023	0.60	250.00	150
Nicolas Cordova	Meeting with co-counsel re LCMC settlement terms;	9/6/2023	0.70	250.00	175
Sovereign Hager	Meet with co counsel re settlement terms.	9/6/2023	0.70	300.00	210
Nicolas Cordova	Review LCMC communications re presentment hearing and settlement status; write to counsel re question re status memo	9/7/2023	0.30	250.00	75
Sovereign Hager	Review and edit injunction relief language for settlement.	9/13/2023	0.40	300.00	120
Nicolas Cordova	Work on LCMC injunction language for settlement	9/14/2023	0.60	250.00	150
Nicolas Cordova	Further edits to injunction proposal.	9/15/2023	0.70	250.00	175
Sovereign Hager	Prepared for presentment hearing.	10/3/2023	1.50	300.00	450
Nicolas Cordova	Review transcript and attend LCMC presentment hearing; edit proposed order following presentment hearing on discovery issue	10/4/2023	1.40	250.00	350
Sovereign Hager	Appeared at presentment hearing and emailed proposed order to opposing counsel	10/4/2023	0.80	300.00	240
Nicolas Cordova	Write to counsel re meet and confer strategizing pre-meeting	10/10/2023	0.10	250.00	25
Nicolas Cordova	Prep for and have meeting with co-counsel re LCMC settlement meet and confer; have meet and confer with opposing counsel; debrief meet and confer meeting with co-counsel	10/11/2023	2.40	250.00	600
Sovereign Hager	Mtg with opposing counsel regarding settlement proposal.	10/11/2023	0.80	300.00	240
Sovereign Hager	Mtg with co counsel.	10/11/2023	1.20	300.00	360

Nicolas Cordova	Speak w class rep re scheduling time to debrief	10/18/2023	0.40	250.00	100
Nicolas Cordova	Call w class rep re case updates	10/20/2023	0.50	250.00	125
Sovereign Hager	Mtg with NC to review injunctive relief agreed to by LCMC and research	10/20/2023	0.80	300.00	240
Nicolas Cordova	Research re LCMC injunction relief	11/1/2023	1.90	250.00	475
Nicolas Cordova	Meeting w co-counsel re settlement proposal.	11/3/2023	2.00	250.00	500
Sovereign Hager	Mtg wth co counsel	11/3/2023	2.00	300.00	600
Nicolas Cordova	Review discovery and research for / edit draft LCMC injunction proposal	11/7/2023	2.20	250.00	550
Nicolas Cordova	Review proposed motions from Faber re LCMC discovery	11/22/2023	0.30	250.00	75
Nicolas Cordova	Review LCMC settlement proposal; coordinate w counsel re meeting on strategy; write to named plaintiff with updates	11/29/2023	0.80	250.00	200
Nicolas Cordova	Meeting w cocounsel re strategy and discovery	12/1/2023	0.50	250.00	125
Sovereign Hager	Mtg with co counsel about case	12/1/2023	0.50	300.00	150
Nicolas Cordova	Edits to protective order.	12/4/2023	0.50	250.00	125
Nicolas Cordova	Review LCMC discovery responses from Faber; discuss next steps with SH and write to co-counsel	12/8/2023	2.00	250.00	500
Sovereign Hager	Reviewed discovery from F & B, email to co counsel.	12/8/2023	1.20	300.00	360
Nicolas Cordova	Draft LCMC injunctive relief for Faber; review response for motion for extension on discovery order	12/12/2023	4.20	250.00	1050
Sovereign Hager	Reviewed motion response on F & B's extension. emailed w/ co counsel.	12/12/2023	0.50	300.00	150

Nicolas Cordova	Review LCMC discovery	12/13/2023	1.00	250.00	250
Nicolas Cordova	Edit LCMC injunctive relief for Faber	12/14/2023	0.70	250.00	175
Sovereign Hager	Review and edit injunctive relief section for F & B in settlement proposal, discuss w/ NC	12/14/2023	0.80	300.00	240
Nicolas Cordova	Review and provide edits to LCMC injunctive relief	1/3/2024	0.40	250.00	100
Nicolas Cordova	Review and edit injunctive relief; draft email to counsel re proposed language	1/8/2024	0.80	250.00	200
Nicolas Cordova	Review injunctive relief and draft counter proposal and letter	1/22/2024	2.00	250.00	500
Sovereign Hager	Review proposed injunctive relief and letter, provide comments and met briefly with NC re the same.	1/22/2024	0.50	300.00	150
Sovereign Hager	Emails with co counsel, reviewed defendant position on motion to compel	1/29/2024	0.60	300.00	180
Nicolas Cordova	LCMC co-counsel meeting re settlement and strategy	2/1/2024	0.50	250.00	125
Sovereign Hager	Mtg w/ co counsel	2/1/2024	0.60	300.00	180
Nicolas Cordova	Meeting w SH re discovery review	2/7/2024	0.20	250.00	50
Nicolas Cordova	Review and revise injunction proposal	2/12/2024	0.80	250.00	200
Nicolas Cordova	Review discovery responses and edit injunction draft proposal	2/20/2024	0.40	250.00	100
Nicolas Cordova	Review discovery and edit proposed injunctive relief for LCMC	2/21/2024	2.20	250.00	550
Sovereign Hager	Review injunctive relief proposal make edits	2/21/2024	0.80	300.00	240
Nicolas Cordova	Review and revise proposed injunctive relief	2/23/2024	1.40	250.00	350
Nicolas Cordova	Call w named plaintiff re withdrawal and transition; writ to	3/15/2024	0.30	250.00	75

	named plaintiff re connection with SH				
Sovereign Hager	Set up mtg with opposing counsel and reviewed documents to prep for the same.	3/22/2024	0.60	300.00	180
Nicolas Cordova	Review LCMC discovery and send SH summary of class members	4/4/2024	0.70	250.00	175
Sovereign Hager	Prepped for and attended mtg to negotiate settlement	4/4/2024	1.60	300.00	480
Sovereign Hager	Reviewed redline proposal from F & B and drafted response to changes requested by LCMC, shared class member list with actual damages.	4/10/2024	2.60	300.00	780
Sovereign Hager	Reviewed and edited F & B proposal	4/11/2024	0.80	300.00	240
Sovereign Hager	Edits to injunctive relief provisions and reviewed discovery to inform the revisions.	4/12/2024	1.90	300.00	570
Sovereign Hager	Met with cocounsel.	4/16/2024	0.50	300.00	150
Sovereign Hager	Created updated document reflecting current changes under review in the settlement, found example of illegal correspondence to class members and emailed list of issues and documents to opposing counsel.	4/17/2024	1.30	300.00	390
Sovereign Hager	Prep for and attend mtg with Opposing counsel re injunctive relief.	4/17/2024	1.60	300.00	480
Sovereign Hager	Prep for and attend mtg with LCMC and F& B	4/25/2024	1.60	300.00	480
Sovereign Hager	Finalize injunctive relief edits and send to opposing counsel.	4/26/2024	0.80	300.00	240
Sovereign Hager	Read response from F & B, emails with Co-counsel	5/6/2024	0.60	300.00	180
Sovereign Hager	rescheduling mtg with opposing counsel.	5/7/2024	0.40	300.00	120

Sovereign Hager	research billing statement issue raised by F & B, drafted written response sent to legal team for review.	5/14/2024	2.30	300.00	690
Sovereign Hager	call and email with co counsel with status of agreement on non-injunctive proposals.	5/15/2024	0.60	300.00	180
Sovereign Hager	meet with opposing counsel.	5/16/2024	0.50	300.00	150
Sovereign Hager	emails with co-counsel, scheduling with neutral attorney.	5/21/2024	0.30	300.00	90
Sovereign Hager	email to opposing counsel re conflict check for neutral attorney	5/23/2024	0.40	300.00	120
Sovereign Hager	research FDCPA question	6/5/2024	1.30	300.00	390
Sovereign Hager	research FDCPA question	6/6/2024	1.30	300.00	390
Sovereign Hager	prep for and attend mtg with opposing counsel and neutral attorney, call with co counsel following the meeting.	6/7/2024	1.00	300.00	300
Sovereign Hager	drafted brief for neutral attorney	6/17/2024	2.50	300.00	750
Sovereign Hager	finalized brief and sent with exhibits.	6/21/2024	2.00	300.00	600
Sovereign Hager	drafted response brief. researched regulatory history for fdcpa and pdcpa	6/24/2024	3.50	300.00	1050
Sovereign Hager	finished drafting response brief.	6/25/2024	0.80	300.00	240
Sovereign Hager	finalized and sent response brief.	6/28/2024	0.60	300.00	180
Sovereign Hager	read decision of arbitrator.	7/3/2024	0.60	300.00	180
Sovereign Hager	drafted settlement agreement and class notice.	8/8/2024	3.60	300.00	1080
Sovereign Hager	Drafted proposed orders and other exhibits to the settlement agreement, incorporated edits from co counsel.	8/9/2024	5.60	300.00	1680

Sovereign Hager	drafted class notice and order of preliminary approval.	8/12/2024	2.50	300.00	750
Sovereign Hager	edited order of preliminary approval and final order, edited settlement agreement.	8/14/2024	3.00	300.00	900
Sovereign Hager	drafted motion for preliminary approval of settlement.	8/15/2024	2.60	300.00	780
Sovereign Hager	final edits to settlement agreement and sent to co counsel.	8/15/2024	1.50	300.00	450
Sovereign Hager	drafted motion for preliminary approval.	8/29/2024	3.00	300.00	900
Sovereign Hager	draft motion for preliminary approval, review fees and prepare estimate for co counsel.	9/3/2024	3.60	300.00	1080
Sovereign Hager	review edits to Motion for preliminary approval, edit draft.	9/6/2024	0.80	300.00	240
Sovereign Hager	emails with co counsel, fee estimation	9/10/2024	0.60	300.00	180
Sovereign Hager	finished draft of motion for preliminary approval, incorporated edits from co-counsel and emailed opposing counsel.	9/11/2024	1.60	300.00	480
Sovereign Hager	reviewed edits to settlement agreement.	9/16/2024	0.50	300.00	150
Sovereign Hager	emailed co-counsel re changes to draft settlement.	9/18/2024	0.60	300.00	180
Sovereign Hager	email with co counsel	9/20/2024	0.40	300.00	120
Sovereign Hager	followed up with opposing counsel on outstanding items, called class rep with update.	10/2/2024	0.60	300.00	180
Sovereign Hager	call to opposing counsel.	10/9/2024	0.40	300.00	120
Sovereign Hager	researched claim releases, emailed opposing counsel, call with co counsel re the same.	10/23/2024	1.80	300.00	540
Sovereign Hager	drafted motion to reopen, sent to opposing counsel,	10/29/2024	0.50	300.00	150

Sovereign Hager	completed attorneys certificate to reopen case, conferred with paralegal.	11/7/2024	0.60	300.00	180
Sovereign Hager	emails with opposing counsel regarding contact info for class members.	11/18/2024	0.40	300.00	120
Sovereign Hager	call to rep plaintiff re settlement signature, finalized settlement agreement emailed to counsel for signature, called court re procedural closure.	11/22/2024	1.40	300.00	420
Sovereign Hager	call to schedule mtg with named rep, call to court to check on case reopening.	11/25/2024	0.80	300.00	240
Sovereign Hager	Call with named plaintiff	11/26/2024	0.30	300.00	90
Sovereign Hager	Call with named plaintiff	11/27/2024	0.60	300.00	180
Sovereign Hager	Call with named plaintiff.	12/3/2024	0.20	300.00	60
Sovereign Hager	Sent executed settlement to opposing parties	12/6/2024	0.30	300.00	90
Sovereign Hager	Call with named plaintiff on status of case.	12/13/2024	0.40	300.00	120
Sovereign Hager	email with co counsel, re F & B failure to sign settlement.	1/9/2025	0.40	300.00	120
Sovereign Hager	Reviewed past communication for documentation of agreement, call to LCMC attorney, drafted email threatening to enforce prior agreement and sent to cocounsel for review.	1/13/2025	0.80	300.00	240
Sovereign Hager	Email with cocounsel, call with LCMC attorney re the case.	1/14/2025	0.60	300.00	180
Sovereign Hager	Call with class member about damages amount, follow up email to LCMC counsel re the same.	1/29/2025	1.60	300.00	480
Sovereign Hager	Call with co counsel re actual damages amounts.	1/30/2025	0.60	300.00	180

Sovereign Hager	reconciled actual damages amounts between hospital and debt collector.	2/7/2025	3.20	300.00	960
Sovereign Hager	Finished damages analysis, emailed cocounsel re the same.	2/12/2025	1.80	300.00	540
Sovereign Hager	Emails with opposing counsel re accuracy of LCMC amounts billed.	2/13/2025	0.60	300.00	180
Sovereign Hager	Reviewed individual class member damages and compared to LCMC medical debt case filings.	2/25/2025	1.80	300.00	540
Sovereign Hager	Call with cocounsel.	2/26/2025	0.60	300.00	180
Sovereign Hager	Analyzed new damages information and emailed cocounsel.	3/1/2025	0.50	300.00	150
Sovereign Hager	Sent doc package for submission to class administrator	4/3/2025	1.50	300.00	450
Sovereign Hager	Emails with class administrator, sent class list.	4/8/2025	0.30	300.00	90
Sovereign Hager	Emails to cocounsel and emails to court re distribution date.	4/14/2025	0.40	300.00	120
Sovereign Hager	Scheduled time with class administrator.	4/15/2025	0.10	300.00	30
Sovereign Hager	Emails to class administrator	4/21/2025	0.40	300.00	120
Sovereign Hager	Met with class administrator and sent follow up docs.	4/23/2025	0.50	300.00	150
Sovereign Hager	Reviewed and emailed further info to class administrator.	4/24/2025	0.40	300.00	120
Sovereign Hager	Emails with class administrator.	4/29/2025	0.30	300.00	90
Sovereign Hager	Prepared affidavit and finalized fee petition.	5/7/2025	2.10	300.00	630
Sovereign Hager	Additional work on the case after the filing of fee petition.	5/8/2025	5.00	300.00	1500
	TOTAL		301.1		\$86,255.00