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10 *Class Counsel*

11  
 12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA

14  
 15 IGNACIO PEREZ, on Behalf of Himself  
 16 and all Others Similarly Situated,

17 Plaintiffs,

18 v.

19 RASH CURTIS & ASSOCIATES,

20 Defendant.

Case No. 4:16-cv-03396-YGR

**DECLARATION OF SCOTT A. BURSOR  
 IN SUPPORT OF PLAINTIFF'S NOTICE  
 OF MOTION AND MOTION FOR THE  
 COURT TO APPROVE THE PROPOSED  
 PLAN OF DISTRIBUTION**

Judge: Hon. Yvonne Gonzalez Rogers

**DECLARATION OF SCOTT A. BURSOR**

I, Scott A. Bursor, declare as follows:

1. I am an attorney at law licensed to practice in the State of California. I am a member of the bar of this Court, and I am a partner at Bursor & Fisher, P.A., which was appointed Class Counsel in this action. See ECF No. 81. I make this declaration in support of Plaintiff’s Notice of Motion and Motion for the Court to Approve the Proposed Plan of Distribution.

**I. THE PEREZ II SETTLEMENT AGREEMENT**

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Settlement Agreement And Release (“Agreement”) for the related case *Perez v. Indian Harbor Insurance Co.*, Case No. 4:19-cv-07288-YGR (“*Perez II*”) through which the class will recover \$75.6 million.

**II. BACKGROUND AND EXPERIENCE OF CLASS COUNSEL**

3. I received my Juris Doctor from the University of Texas Law School in 1996. While in law school, I served as Articles Editor of the Texas Law Review, and was a member of the Board of Advocates and Order of the Coif. Prior to starting my own practice, I was a litigation associate with Cravath, Swaine & Moore (1996-2000) and Chadbourne & Parke LLP (2001), where I represented large telecommunications, pharmaceutical, and technology companies in commercial litigation. My law firm, Bursor & Fisher, P.A., was founded in 2002, and has focused on large-scale class action litigation from its inception.

4. Class actions are rarely brought to trial. However, Mr. Fisher and I have served as lead trial counsel for class action plaintiffs in six jury trials and have won all six, with recoveries ranging from \$21 million to \$299 million.

i. In 2007, Mr. Fisher and I served as lead trial counsel in *Thomas v. Global Vision Products* (Alameda County Superior Court), representing a class of approximately 150,000 California consumers who had purchased the Avacor hair regrowth system, asserting claims for violations of California’s consumer protection statutes. After a four-week trial the jury returned a \$37 million verdict for the class. The trial judge increased the award to \$40 million.

ii. In 2008, Mr. Fisher and I served as lead trial counsel in *Ayyad v. Sprint Spectrum L.P.* (Alameda County Superior Court), representing a class of 2 million California consumers who were charged an early termination fee

1 under a Sprint cellphone contract, asserting claims that such fees were  
2 unlawful liquidated damages under Civil Code § 1671(d), as well as other  
3 statutory and common law claims. After a five-week trial, the jury returned  
4 a verdict in June 2008, and the Court issued a Statement of Decision in  
5 December 2008 awarding the class more than \$299 million in cash and debt  
6 cancellation. The class prevailed on six of six counts asserted in the  
7 complaint and was awarded 100% of the relief sought.

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iii. In 2008, Mr. Fisher and I served as lead trial counsel in *White v. Verizon Wireless* (Alameda County Superior Court), representing a class of 1.4 million California consumers who were charged an early termination fee under a Verizon cellphone contract, asserting claims that such fees were unlawful liquidated damages under Civil Code § 1671(d), as well as other statutory and common law claims. After I presented the class's case-in-chief, rested, then cross-examined Verizon's principal trial witness, Verizon agreed to settle the case for a \$21 million cash payment and an injunction restricting Verizon's ability to impose early termination fees in future subscriber agreements.

iv. In 2009, Mr. Fisher and I served as lead trial counsel in a second trial in *Thomas v. Global Vision Products*, in which the class asserted claims against a minority shareholder in the company. After another four-week trial the jury returned a verdict awarding more than \$50 million to the class. The legal trade publication VerdictSearch reported this was the second largest jury verdict in California in 2009.

v. In 2013, Mr. Fisher and I served as lead trial counsel in a second trial in *Ayyad v. Sprint Spectrum L.P.* (Alameda County Superior Court). After we had prevailed on the class claims challenging Sprint's termination fees in 2008, Sprint asserted a \$1.06 billion cross-claim against the class for breach of contract. See *Garrett v. Coast & Southern Federal Sav. & Loan Ass'n*, 9 Cal. 3d 731, 740-41 (1973) (holding that invalidation of a liquidated damages provision does not permit the breaching party to "escape[] unscathed," because he "remains liable for the actual damages resulting from his default"). After a four-week trial, the jury returned a verdict awarding only 2% of Sprint's claimed damages. This verdict secured the Class's net cash recovery of at least \$55 million after a setoff for Sprint's actual damages.

vi. In 2019, Mr. Fisher, Mr. Krivoshey, and I served as lead trial counsel in the present case, *Perez v. Rash Curtis & Associates* (N.D. Cal.). After a one-week trial, the jury returned a verdict in May 2019 finding that Defendant made 534,712 calls that violated the TCPA. The Court entered judgment in the amount of \$267,349,000.

1           5.       In addition to these six trial victories, I have been counsel to class action plaintiffs in  
2 dozens of cases in jurisdictions throughout the United States. Since December 2010, my firm has  
3 won appointment as Class Counsel or Interim Class Counsel in:  
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- 5           *i. O'Brien v. LG Electronics USA, Inc.* (D.N.J. Dec. 16, 2010) to represent a  
6 certified nationwide class of purchasers of LG French-door refrigerators,
- 7           *ii. Ramundo v. Michaels Stores, Inc.* (N.D. Ill. June 8, 2011) to represent a  
8 certified nationwide class of consumers who made in-store purchases at  
9 Michaels Stores using a debit or credit card and had their private financial  
10 information stolen as a result,
- 11           *iii. In re Haier Freezer Consumer Litig.* (N.D. Cal. Aug. 17, 2011) to represent  
12 a certified class of purchasers of mislabeled freezers from Haier America  
13 Trading, LLC,
- 14           *iv. Rodriguez v. CitiMortgage, Inc.* (S.D.N.Y. Nov. 14, 2011) to represent a  
15 certified nationwide class of military personnel against CitiMortgage for  
16 illegal foreclosures,
- 17           *v. Avram v. Samsung Electronics America, Inc., et al.* (D.N.J. Jan. 3, 2012), to  
18 represent a proposed nationwide class of purchasers of mislabeled  
19 refrigerators from Samsung Electronics America, Inc. and Lowe's  
20 Companies, Inc.,
- 21           *vi. Rossi v. The Procter & Gamble Co.* (D.N.J. Jan. 31, 2012), to represent a  
22 certified nationwide class of purchasers of Crest Sensitivity Treatment &  
23 Protection toothpaste,
- 24           *vii. Dzielak v. Whirlpool Corp. et al.* (D.N.J. Feb. 21, 2012), to represent a  
25 proposed nationwide class of purchasers of mislabeled Maytag Centennial  
26 washing machines from Whirlpool Corp., Sears, and other retailers,
- 27           *viii. In re Sensa Weight Loss Litig.* (N.D. Cal. Mar. 2, 2012), to represent a  
28 certified nationwide class of purchasers of Sensa weight loss products,
- ix. In re Sinus Buster Products Consumer Litig.* (E.D.N.Y. Dec. 17, 2012) to  
represent a certified nationwide class of purchasers of Sinus Buster products,
- x. Ebin v. Kangadis Food Inc.* (S.D.N.Y. Feb. 25, 2014) to represent a certified  
nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
- xi. Forcellati v. Hyland's, Inc.* (C.D. Cal. Apr. 9, 2014) to represent a certified  
nationwide class of purchasers of children's homeopathic cold and flu  
remedies,
- xii. Ebin v. Kangadis Family Management LLC, et al.* (S.D.N.Y. Sept. 18, 2014)  
to represent a certified nationwide class of purchasers of Capatriti 100%  
Pure Olive Oil,
- xiii. In re Scotts EZ Seed Litig.* (S.D.N.Y. Jan. 26, 2015), to represent a certified  
class of purchasers of Scotts Turf Builder EZ Seed,
- xiv. Dei Rossi v. Whirlpool Corp., et al.* (E.D. Cal. Apr. 28, 2015), to represent a  
certified class of purchasers of mislabeled KitchenAid refrigerators from  
Whirlpool Corp., Best Buy, and other retailers,
- xv. Hendricks v. StarKist Co.* (N.D. Cal. July 23, 2015) to represent a certified  
nationwide class of purchasers of StarKist tuna products,

- 1                   xvi. *In re NVIDIA GTX 970 Graphics Card Litig.* (N.D. Cal. May 8, 2015), to  
2                   represent a proposed nationwide class of purchasers of NVIDIA GTX 970  
3                   graphics cards,  
4                   xvii. *Melgar v. Zicam LLC, et al.* (E.D. Cal. March 30, 2016) to represent a  
5                   certified ten-jurisdiction class of purchasers of Zicam Pre-Cold products,  
6                   xviii. *In re Trader Joe's Tuna Litigation* (C.D. Cal. December 21, 2016) to  
7                   represent purchaser of allegedly underfilled Trader Joe's canned tuna,  
8                   xix. *In re Welspun Litigation* (S.D.N.Y. January 26, 2017), to represent a  
9                   proposed nationwide class of purchasers of Welspun Egyptian cotton  
10                  bedding products,  
11                  xx. *Retta v. Millennium Products, Inc.* (C.D. Cal. January 31, 2017), to represent  
12                  a certified nationwide class of Millennium kombucha beverages,  
13                  xxi. *Moeller v. American Media, Inc.*, (E.D. Mich. June 8, 2017) to represent a  
14                  class of magazine subscribers under the Michigan Preservation of Personal  
15                  Privacy Act,  
16                  xxii. *Hart v. BHH, LLC* (S.D.N.Y. July 7, 2017) to represent a nationwide class of  
17                  purchasers of Bell & Howell ultrasonic pest repellers,  
18                  xxiii. *McMillion v. Rash Curtis & Associates* (N.D. Cal. September 6, 2017), to  
19                  represent a certified nationwide class of individuals who received calls from  
20                  Rash Curtis & Associates,  
21                  xxiv. *Lucero v. Solarcity Corp.* (N.D. Cal. September 15, 2017), to represent a  
22                  certified nationwide class of individuals who received telemarketing calls  
23                  from Solarcity Corp.,  
24                  xxv. *Taylor v. Trusted Media Brands, Inc.* (S.D.N.Y. Oct. 17, 2017) to represent a  
25                  class of magazine subscribers under the Michigan Preservation of Personal  
26                  Privacy Act,  
27                  xxvi. *Gasser v. Kiss My Face, LLC* (N.D. Cal. Oct. 23, 2017) to represent a  
28                  proposed nationwide class of purchasers of cosmetic products,  
29                  xxvii. *Gastelum v. Frontier California Inc.* (S.F. Superior Court February 21,  
30                  2018), to represent a certified California class of Frontier landline telephone  
31                  customers who were charged late fees,  
32                  xxviii. *Williams v. Facebook, Inc.* (N.D. Cal. June 26, 2018) to represent a proposed  
33                  nationwide class of Facebook users for alleged privacy violations,  
34                  xxix. *Ruppel v. Consumers Union of United States, Inc.* (S.D.N.Y. July 27, 2018)  
35                  to represent a class of magazine subscribers under the Michigan Preservation  
36                  of Personal Privacy Act,  
37                  xxx. *Bayol v. Health-Ade* (N.D. Cal. August 23, 2018), to represent a proposed  
38                  nationwide class of Health-Ade kombucha beverage purchasers,  
39                  xxxi. *West v. California Service Bureau* (N.D. Cal. September 12, 2018), to  
40                  represent a certified nationwide class of individuals who received calls from  
41                  California Service Bureau,  
42                  xxxii. *Gregorio v. Premier Nutrition Corporation* (S.D.N.Y. Sept. 14, 2018) to  
43                  represent a nationwide class of purchasers of protein shake products,  
44                  xxxiii. *Moeller v. Advance Magazine Publishers, Inc. d/b/a Condé Nast* (S.D.N.Y.  
45                  Oct. 24, 2018) to represent a class of magazine subscribers under the  
46                  Michigan Preservation of Personal Privacy Act,

- 1 xxxiv. *Bakov v. Consolidated World Travel Inc. d/b/a Holiday Cruise Line* (N.D.  
2 Ill. Mar. 21, 2019) to represent a certified class of individuals who received  
calls from Holiday Cruise Line,
- 3 xxxv. *Martinelli v. Johnson & Johnson* (E.D. Cal. March 29, 2019) to represent a  
4 certified class of purchasers of Benecol spreads labeled with the  
representation “No Trans Fat,”
- 5 xxxvi. *Edwards v. Hearst Communications, Inc. (S.D.N.Y. April 24, 2019)* to  
6 represent a class of magazine subscribers under the Michigan Preservation  
of Personal Privacy Act,
- 7 xxxvii. *Galvan v. Smashburger* (C.D. Cal. June 25, 2019) to represent a proposed  
class of purchasers of Smashburger’s “Triple Double” burger,
- 8 xxxviii. *Kokoszki v. Playboy Enterprises, Inc.* (E.D. Mich. Feb. 7, 2020) to represent  
9 a class of magazine subscribers under the Michigan Preservation of Personal  
Privacy Act,
- 10 xxxix. *Russett v. The Northwestern Mutual Life Insurance Co.* (S.D.N.Y. May 28,  
2020) to represent a class of insurance policyholders that were allegedly  
11 charged unlawful paper billing fees,
- 12 xl. *In re: Metformin Marketing and Sales Practices Litigation* (D.N.J. June 3,  
2020) to represent a proposed nationwide class of purchasers of generic  
13 diabetes medications that were contaminated with a cancer-causing  
carcinogen,
- 14 xli. *Hill v. Spirit Airlines, Inc.* (S.D. Fla. July 21, 2020) to represent a proposed  
nationwide class of passengers whose flights were cancelled by Spirit  
15 Airlines due to the novel coronavirus, COVID-19, and whose tickets were  
not refunded,
- 16 xlii. *Kramer v. Alterra Mountain Co.* (D. Colo. July 31, 2020) to represent a  
proposed nationwide class of purchasers to recoup the unused value of their  
17 Ikon ski passes after Alterra suspended operations at its ski resorts due to the  
novel coronavirus, COVID-19,
- 18 xliii. *Qureshi v. American University* (D.D.C. July 31, 2020) to represent a  
proposed nationwide class of students for tuition and fee refunds after their  
19 classes were moved online by American University due to the novel  
coronavirus, COVID-19,
- 20 xliv. *Hufford v. Maxim Inc.* (S.D.N.Y. Aug. 13, 2020) to represent a class of  
21 magazine subscribers under the Michigan Preservation of Personal Privacy  
Act,
- 22 xlv. *Desai v. Carnegie Mellon University* (W.D. Pa. Aug. 26, 2020) to represent  
a proposed nationwide class of students for tuition and fee refunds after their  
23 classes were moved online by Carnegie Mellon University due to the novel  
coronavirus, COVID-19,
- 24 xlvi. *Heigl v. Waste Management of New York, LLC* (E.D.N.Y. Aug. 27, 2020) to  
25 represent a class of insurance policyholders that were allegedly charged  
unlawful paper billing fees,
- 26 xlvii. *Stellato v. Hofstra University* (E.D.N.Y. Sept. 18, 2020) to represent a  
proposed nationwide class of students for tuition and fee refunds after their  
27 classes were moved online by Hofstra University due to the novel  
coronavirus, COVID-19,
- 28

- 1                    *xlvi. Kaupelis v. Harbor Freight Tools USA, Inc.* (C.D. Cal. Sept. 23, 2020), to  
2                    represent consumers who purchased defective chainsaws,  
3                    *xliv. Soo v. Lorex Corporation* (N.D. Cal. Sept. 23, 2020), to represent consumers  
4                    whose security cameras were intentionally rendered non-functional by  
5                    manufacturer,  
6                    *l. Miranda v. Golden Entertainment (NV), Inc.* (D. Nev. Dec. 17, 2020), to  
7                    represent consumers and employees whose personal information was  
8                    exposed in a data breach,  
9                    *li. Benbow v. SmileDirectClub, Inc.* (Cir. Ct. Cook Cnty. Feb. 4, 2021), to  
10                    represent a certified nationwide class of individuals who received text  
11                    messages from SmileDirectClub, in alleged violation of the Telephone  
12                    Consumer Protection Act,  
13                    *lii. Suren v. DSV Solutions, LLC* (Cir. Ct. DuPage Cnty. Apr. 8, 2021), to  
14                    represent a certified class of employees who used a fingerprint clock-in  
15                    system, in alleged violation of the Illinois Biometric Information Privacy  
16                    Act,  
17                    *liii. De Lacour v. Colgate-Palmolive Co.* (S.D.N.Y. Apr. 23, 2021), to represent  
18                    a certified class of consumers who purchased allegedly “natural” Tom’s of  
19                    Maine products,  
20                    *liv. Wright v. Southern New Hampshire University* (D.N.H. Apr. 26, 2021), to  
21                    represent a certified nationwide class of students for tuition and fee refunds  
22                    after their classes were moved online by Southern New Hampshire  
23                    University due to the novel coronavirus, COVID-19,  
24                    *lv. Sahlin v. Hospital Housekeeping Systems, LLC* (Cir. Ct. Williamson Cnty.  
25                    May 21, 2021), to represent a certified class of employees who used a  
26                    fingerprint clock-in system, in alleged violation of the Illinois Biometric  
27                    Information Privacy Act.

17                    6.        A copy of my firm’s resume, which includes more detailed information about our  
18                    practice and the qualifications of the other Bursor & Fisher lawyers who worked on this case, is  
19                    attached as **Exhibit 2**.

### 20        **III.    CLASS COUNSEL’S LODESTAR**

21                    7.        Bursor & Fisher’s attorneys and staff have recorded time entries for all work  
22                    performed in this case. I have personally reviewed all of my firm’s time entries, and have used  
23                    billing judgment to ensure that duplicative or unnecessary time has been excluded and that only  
24                    time reasonably devoted to the litigation has been included. The time and descriptions displayed in  
25                    these records were regularly and contemporaneously recorded by me and the other timekeepers of  
26                    the firm pursuant to firm policy and have been maintained in the computerized records of my firm.  
27                    True and correct copies of these billing records are attached hereto as **Exhibit 3**.

1           8.       Attached hereto as **Exhibit 4** is a chart setting forth the hourly rates charged for  
2 lawyers and staff at my firm.

3           9.       Based on my knowledge and experience, the hourly rates charged by my firm are  
4 within the range of market rates charged by attorneys of equivalent experience, skill, and expertise.  
5 These are the same hourly rates that we actually charge to our regular hourly clients who have  
6 retained us for non-contingent matters, and which are actually paid by those clients. As a matter of  
7 firm policy, we do not discount our regular hourly rates for non-contingent hourly work, which has  
8 historically comprised approximately 10% of our revenue. I have personal knowledge of the range  
9 of hourly rates typically charged by counsel in our field in New York, California, Florida, and  
10 throughout the United States, both on a current basis and in the past. In determining my firm's  
11 hourly rates from year to year, my partners and I have consciously taken market rates into account  
12 and have aligned our rates with the market.

13           10.       Through my practice, I have become familiar with the non-contingent market rates  
14 charged by attorneys in New York, California, and Florida and elsewhere (my firm's offices are in  
15 New York City, Walnut Creek, California, and Miami, Florida). This familiarity has been obtained  
16 in several ways: (1) by litigating attorneys' fee applications; (2) by discussing fees with other  
17 attorneys; (3) by obtaining declarations regarding prevailing market rates filed by other attorneys  
18 seeking fees; and (4) by reviewing attorneys' fee applications and awards in other cases, as well as  
19 surveys and articles on attorney's fees in the legal newspapers and treatises. The information I  
20 have gathered shows that my firm's rates are in line with the non-contingent market rates charged  
21 by attorneys of reasonably comparable experience, skill, and reputation for reasonably comparable  
22 class action work. In fact, comparable hourly rates have been found reasonable by various courts  
23 for reasonably comparable services, including:

- 24                   i.       *In re Animation Workers Antitrust Litig.*, 2016 WL 6663005, at \*6 (N.D.  
25                   Cal. Nov. 11, 2016), an employment antitrust class action, in which the court  
26                   found hourly rates between \$845 and \$1,200 per hour to be reasonable for  
27                   the lead class counsel.  
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- 1                   ii. *Nitsch v. DreamWorks Animation SKG Inc.*, 2017 WL 2423161, at \*9 (N.D.  
2                   Cal. June 5, 2017), an employment antitrust class action, in which the court  
3                   found hourly rates between \$870 and \$1,200 per hour to be reasonable for  
4                   the lead class counsel.
- 5                   iii. *Rainbow Bus. Solutions v. MBF Leading LLC*, 2017 WL 6017884, at \*1  
6                   (N.D. Cal. Dec. 5, 2017), a class action concerning credit card fraud, in  
7                   which the court found hourly rates between \$275 and \$950 per hour to be  
8                   reasonable.
- 9                   iv. *In re TFT-LCD (Flat Panel) Antitrust Litigation*, No. M 07 1827 SI, MDL,  
10                  No. 1827 (N.D.Cal. 2013), an antitrust class action, in which the court found  
11                  blended hourly rates of \$1000, \$950, \$861, \$825, \$820, and \$750 per hour  
12                  reasonable for the lead class counsel.
- 13                  v. *Loretz v. Regal Stone, Ltd.*, 756 F. Supp. 2d 1203, 1211 (N.D. Cal. 2010), a  
14                  class action concerning claims resulting from an oil spill, in which the court  
15                  found hourly rates of between \$775 and \$900 per hour to be reasonable for  
16                  lead trial counsel.
- 17                  vi. *Luquetta v. The Regents of the Univ. of California*, San Francisco Superior  
18                  Ct. No.CGC-05-443007, Order Granting Plaintiff’s Motion for Common  
19                  Fund Attorneys’ Fees and Expenses, filed October 31, 2012, a class action to  
20                  recover tuition overcharges, in which the court found the hourly rates of  
21                  \$850, \$785, \$750, and \$700 reasonable for plaintiffs’ more experienced  
22                  counsel.
- 23                  vii. *Pierce v. County of Orange*, 905 F. Supp. 2d 1017 (C.D. Cal. 2012), a civil  
24                  rights class action brought by pre-trial detainees, in which the court  
25                  approved 2011 rates of \$850 and \$825 per hour.
- 26                  viii. *Californians for Disability Rights, Inc., et al. v. California Department of*  
27                  *Transportation, et al.*, 2010 U.S. Dist. LEXIS 141030 (N.D. Cal. 2010),  
28                  adopted by Order Accepting Report and Recommendation filed February 2,

2011, a class action in which the court found reasonable 2010 hourly rates of up to \$835 per hour.

- ix. *Credit/Debit Card Tying Cases*, San Francisco County Superior Court, JCCP No. 4335, Order Granting Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Incentive Awards, filed August 23, 2010, an antitrust class action, in which the court found reasonable 2010 hourly rates of \$975 for a 43-year attorney, \$950 for a 46-year attorney, \$850 for 32 and 38 year attorneys, \$825 for a 35-year attorney, \$740 for a 26-year attorney, \$610 for a 13-year attorney, and \$600 for a 9-year attorney, and \$485 for a 5-year attorney.
- x. *Qualcomm, Inc. v. Broadcom, Inc.*, Case No. 05-CV-1958-B, 2008 WL 2705161 (S.D. Cal. 2008), in which the court found the 2007 hourly rates requested by Wilmer Cutler, Pickering, Hale & Dorr LLP reasonable; those rates ranged from \$45 to \$300 for staff and paralegals, from \$275 to \$505 for associates and counsel, and from \$435 to \$850 for partners.

11. The reasonableness of my firm’s hourly rates is also supported by several surveys of legal rates, including the following:

- i. In an article entitled “On Sale: The \$1,150-Per Hour Lawyer,” written by Jennifer Smith and published in the Wall Street Journal on April 9, 2013, the author describes the rapidly growing number of lawyers billing at \$1,150 or more revealed in public filings and major surveys. The article also notes that in the first quarter of 2013, the 50 top-grossing law firms billed their partners at an average rate between \$879 and \$882 per hour. A true and correct copy of this article is attached hereto as **Exhibit 5**.
- ii. In an article published April 16, 2012, the Am Law Daily described the 2012 Real Rate Report, an analysis of \$7.6 billion in legal bills paid by corporations over a five-year period ending in December 2011. A true and correct copy of that article is attached hereto as **Exhibit 6**. That article confirms that the rates charged by experienced and well-qualified attorneys

1 have continued to rise over this five-year period, particularly in large urban  
2 areas like the San Francisco Bay Area. It also shows, for example, that the  
3 top quartile of lawyers bill at an average of “just under \$900 per hour.”

4 iii. Similarly, on February 25, 2011, the Wall Street Journal published an on-  
5 line article entitled “Top Billers.” A true and correct copy of that article is  
6 attached hereto as **Exhibit 7**. That article listed the 2010 and/or 2009 hourly  
7 rates for more than 125 attorneys, in a variety of practice areas and cases,  
8 who charged \$1,000 per hour or more. Indeed, the article specifically lists  
9 *eleven* (11) Gibson Dunn & Crutcher attorneys billing at \$1,000 per hour or  
10 more.

11 iv. On February 22, 2011, the ALM’s Daily Report listed the 2006-2009 hourly  
12 rates of numerous San Francisco attorneys. A true and correct copy of that  
13 article is attached hereto as **Exhibit 8**. Even though rates have increased  
14 significantly since that time, my firm’s rates are well within the range of  
15 rates shown in this survey.

16 v. The Westlaw CourtExpress Legal Billing Reports for May, August, and  
17 December 2009 (attached hereto as **Exhibit 9**) show that as far back as 2009,  
18 attorneys with as little as 19 years of experience were charging \$800 per  
19 hour or more, and that the rates requested here are well within the range of  
20 those reported. Again, current rates are significantly higher.

21 vi. The National Law Journal’s December 2010, nationwide sampling of law  
22 firm billing rates (attached hereto as **Exhibit 10**) lists 32 firms whose highest  
23 rate was \$800 per hour or more, eleven firms whose highest rate was \$900  
24 per hour or more, and three firms whose highest rate was \$1,000 per hour or  
25 more.

26 vii. On December 16, 2009, The American Lawyer published an online article  
27 entitled “Bankruptcy Rates Top \$1,000 in 2008-2009.” That article is  
28 attached hereto as **Exhibit 11**. In addition to reporting that several attorneys

1 had charged rates of \$1,000 or more in bankruptcy filings in Delaware and  
2 the Southern District of New York, the article also listed 18 firms that  
3 charged median partner rates of from \$625 to \$980 per hour.

4 viii. According to the National Law Journal's 2014 Law Firm Billing Survey, law  
5 firms with their largest office in New York have average partner and  
6 associate billing rates of \$882 and \$520, respectively. Karen Sloan, *\$1,000*  
7 *Per Hour Isn't Rare Anymore; Nominal Billing Levels Rise, But Discounts*  
8 *Ease Blow*, National Law Journal, Jan. 13, 2014. The survey also shows that  
9 it is common for legal fees for partners in New York firms to exceed \$1,000  
10 an hour. *Id.* A true and correct copy of this survey is attached hereto as  
11 **Exhibit 12.**

12 12. Given Bursor & Fisher's unique experience and track record of success winning 6  
13 of 6 class action trials, my hourly rate is set at \$1,000.00, which is the same rate that my firm  
14 charges to clients who retain us on an hourly basis, and which we never discount.

15 13. Through August 18, 2021, Bursor & Fisher attorneys and staff have worked 7,826.7  
16 hours on *Perez I* and *Perez II*, for a lodestar fee based on current billing rates of \$5,830,155.00.  
17 Billing for the work done to date is summarized in the following table:

<i>Perez 1 &amp; 2 Lodestar, 3/4/2016 through 8/18/2021</i>				
NAME	TITLE (year admitted to bar)	HOURS	RATE	TOTAL
Scott A. Bursor (SAB)	Partner (1997)	2,415.0	\$ 1,000.00	\$2,415,000.00
L. Timothy Fisher (LTF)	Partner (1997)	533.9	\$ 1,000.00	\$533,900.00
Joseph I. Marchese (JIM)	Partner (2002)	15.3	\$ 900.00	\$13,770.00
Joel D. Smith (JDS)	Partner (2006)	43.1	\$ 850.00	\$36,635.00
Sarah N. Westcot (SNW)	Partner (2009)	12.0	\$ 800.00	\$9,600.00
Annick M. Persinger (AMP)*	Associate (2010)	12.0	\$ 550.00	\$6,600.00
Yeremey O. Krivoshey (YOK)	Partner (2013)	3,409.6	\$ 700.00	\$2,386,720.00
Julia A. Luster (JAL)*	Associate (2013)	4.8	\$ 525.00	\$2,520.00
Thomas A. Reyda (TAR)*	Associate (2016)	40.3	\$ 400.00	\$16,120.00
Blair E. Reed (BER)	Associate (2017)	316.1	\$ 375.00	\$118,537.50
Brittany S. Scott (BSS)	Associate (2019)	54.5	\$ 325.00	\$17,712.50
Julia K. Venditti (JKV)	Associate (2020)	48.4	\$ 325.00	\$15,730.00
Harrison T. Geron (HTG)*	Law Clerk	13.0	\$ 300.00	\$3,900.00
Debbie L. Schroeder (DLS)	Senior Litigation Support Specialist	329.2	\$ 300.00	\$98,760.00
Rebecca S. Richter (RSR)	Senior Litigation Support Specialist	112.0	\$ 300.00	\$33,600.00
Erin M. Wald (EMW)	Senior Litigation Support Specialist	12.8	\$ 300.00	\$3,840.00
J. Georgina McCulloch (JGM)	Senior Litigation Support Specialist	74.5	\$ 275.00	\$20,542.50
Molly C. Sasseen (MCS)	Senior Litigation Support Specialist	247.1	\$ 275.00	\$67,952.50
Judy M. Fontanilla (JMF)	Litigation Support Specialist	33.9	\$ 250.00	\$8,475.00
Erika S. Grossbard (ESG)	Litigation Support Specialist	7.9	\$ 250.00	\$1,975.00
Amanda E. Larson (AEL)	Litigation Support Specialist	0.1	\$ 250.00	\$25.00
Amy S. Michel-Arce (ASM)	Litigation Support Specialist	1.1	\$ 250.00	\$275.00
Marcella C. Gilbert (MCG)*	Litigation Support Specialist	2.8	\$ 200.00	\$560.00
Jared L. Hazlett (JLH)*	Litigation Support Specialist	87.3	\$ 200.00	\$17,460.00
		<u>7,826.7</u>		<u>\$5,830,155.00</u>

\*Employee no longer works with Bursor & Fisher, P.A. Historical billing rate used in lodestar calculation.

14. Of the 7,826.7 total hours billed, 5,419.9 hours were billed pursuing *Perez I* (including post-trial motions and the appeal), and 2,406.8 hours were billed litigating *Perez II*. Based on current billing rates, Class Counsel's lodestar for the *Perez I* matter is \$3,830,922.50, and Class Counsel's lodestar for the *Perez II* matter is \$1,999,232.50.

15. A fee award of 33.33% of the recovery, \$25.2 million, would represent a multiplier of 4.32 over the base lodestar fee.

16. Notably, when the Court approved a fee award of \$89,116,333.33 in its April 17, 2020 Order, Dkt. No. 427, at 35-36, it did so on the assumption that Class Counsel would spend significant hours in the future that would drive up their anticipated final lodestar. At the time of Class Counsel's prior fee application, we had worked 5,014.8 hours. *Id.* at 35. The Court calculated that if Class Counsel spent an additional 2,725 hours for a total of 7,739.8 hours, a fee award of \$89 million was still reasonable and appropriate. *Id.* at 35-36. Here, Class Counsel in

1 fact worked an additional 2,811.9 hours, just above the number of hours anticipated by the Court  
2 (the Court anticipated 2,725 hours). However, we are seeking an award of \$25,200,000, not the  
3 \$89,116,333.33 previously approved by the Court.

4 17. My firm undertook this representation on a wholly contingent basis recognizing that  
5 the risk of non-payment has been high throughout this litigation. There were substantial  
6 uncertainties in the viability of this case as a class action and the merits of the underlying claims,  
7 and the ability to collect on any judgment that might be obtained. There were also substantial  
8 uncertainties in negotiating the “Assignment of Cause of Action in Exchange for Covenant Not to  
9 Execute” (the “Assignment”) and litigating *Perez II* against a very capable and well-funded  
10 adversary. Although we believed *Perez I* and *Perez II* to be meritorious, a realistic assessment  
11 shows that the risks inherent in the resolution of the liability and merits issues were great. And, the  
12 case remains fraught with risk now, due to the pending appeal and the uncertainties of the bad faith  
13 insurance litigation. We therefore continue to be at great risk for non-payment and have to  
14 continue advancing significant expenses that will not be reimbursed absent a successful result.

15 18. Given the complexity and difficulty of litigating this case, the risk of nonpayment,  
16 and the certainty of a multi-year delay in payment, no lawyer competent to litigate this action  
17 through trial would agree to do so for a lodestar-based fee, or even for a 25% contingency fee.  
18 Indeed, given the need to advance more than \$856,525.80 out-of-pocket for litigation expenses, it  
19 would be difficult to find any lawyer willing to take this case at the outset. The extreme risk that  
20 both litigation and trial presented in this case weighs heavily in favor of an upward departure from  
21 the 25% benchmark and supports an award of 33.33% of the judgment. Indeed, my firm’s retainer  
22 agreement, which was executed by the class representative, Mr. Perez, on June 8, 2016, before the  
23 initial complaint was filed, provides for a contingent fee of 33.33% if the case is settled prior to a  
24 ruling on a dispositive motion, and 40% if the case settles “after a ruling on a dispositive motion, or  
25 after a mediation, arbitration or trial.” A true and correct copy of that retainer agreement is  
26 attached hereto as **Exhibit 13**.

#### 1 IV. CLASS COUNSEL'S EXPENSES

2 19. To date, Class Counsel has expended \$856,525.80 in out-of-pocket litigation  
3 expenses in connection with the prosecution of *Perez I* and *Perez II*. Attached hereto as **Exhibit 14**  
4 is an itemized listing of each out-of-pocket expense my firm incurred in these cases. These  
5 expenses are reflected in the records of my firm, and were necessary to prosecute this litigation. All  
6 expenses were carefully and reasonably expended, and they reflect market rates for various  
7 categories of expenses incurred. Expense items are billed separately and such charges are not  
8 duplicated in my firm's billing rates. Class Counsel's total expenses incurred for litigating the  
9 *Perez I* and *Perez II* matters are \$5,856,525.80. As discussed below, \$5,000,000 of the total  
10 expense is a net liability Class Counsel owes to Omni Bridgeway (Fund 4) Invt. 5 L.P. ("Omni") in  
11 connection with a litigation funding agreement. An additional \$300,000 is a fee paid by Class  
12 Counsel to FinCorp for brokering the agreement with Omni.

13 20. The Omni and FinCorp Expenses: We seek to recover as expenses \$5 million owed  
14 to Omni in connection with a litigation funding agreement (the "Omni Agreement") and \$300,000  
15 which has been paid to FinCorp Associates for brokering the Omni Agreement. Omni's financial  
16 interest in the litigation was disclosed pursuant to Civil L.R. 3-15 in both *Perez I* (Doc. 449) and  
17 *Perez II* (Doc. 93). In connection with the Omni Agreement, Omni (1) retained Blank Rome LLP  
18 and a team of lawyers headed by Linda Kornfeld, Blank Rome's Vice Chair of the Insurance  
19 Recovery Practice Group, to appear as counsel in *Perez II* to assist with strategy, fact and expert  
20 discovery, summary judgment and *Daubert* briefing, and settlement negotiations; and (2) provided  
21 \$10 million in funding to Class Counsel. Under the terms of the Omni agreement, Class Counsel  
22 must repay \$15 million to Omni, for a net expense of \$5 million. Omni has paid Blank Rome's  
23 fees and expenses in *Perez II*, which will not be reimbursed other than through the payment Class  
24 Counsel owes to Omni.

25 21. The Omni Agreement directly benefitted the Class because it greatly enhanced the  
26 Class's bargaining position in settlement negotiations. Through more than 5 years of litigation  
27 prior to the disclosure of the Omni Agreement, Indian Harbor's largest settlement offer was \$2.5  
28 million. The disclosure of the Omni Agreement fundamentally changed the parties' bargaining

1 positions. The Omni Agreement showed that a sophisticated litigation funder had conducted  
2 extensive diligence on the appeal of *Perez I* and also on Perez's likelihood of success in *Perez II*,  
3 and deemed the matter worthy of a \$10 million investment. It established a floor for Defendant's  
4 settlement offers since Perez obviously would not accept any settlement that would not recover  
5 enough money to repay Omni and provide a reasonable recovery to the Class. Because Omni's  
6 investment return would increase over time, the Omni agreement also created time-pressure for  
7 Defendant to settle earlier rather than later. These factors were key elements of Class Counsel's  
8 settlement strategy. And that strategy worked. Upon learning of the existence of the Omni  
9 Agreement, Indian Harbor agreed to pay \$75.6 million to settle *Perez II*. This is the largest TCPA  
10 class recovery to date, and the recovery is more than 75x the policy limit for TCPA claims under  
11 Indian Harbor's applicable insurance policy. The settlement is also more than 30x the largest  
12 settlement offer that pre-dated the disclosure of the Omni Agreement.

13 22. The Omni Agreement also facilitated the appearance of Blank Rome in *Perez II*.  
14 Blank Rome lawyers took 5 of the expert depositions and were heavily involved in preparing  
15 summary judgment and *Daubert* motions. More importantly, Blank Rome's reputation and  
16 expertise in the insurance recovery field enhanced Class Counsel's bargaining power in settlement  
17 negotiations, which helped Class Counsel to negotiate a historic settlement.


18 23. The Omni Agreement provided Class Counsel with enormous leverage that led to a  
19 \$75.6 million settlement. In my opinion, the Omni agreement was the dominant factor influencing  
20 settlement negotiations, and likely added as much as 50% to the value of the settlement. This  
21 extraordinary result would not have been possible without the Omni Agreement.

22 24. Should the Court find that it is not appropriate to award the \$5,300,000 in Omni and  
23 FinCorp payments as expenses, Class Counsel asks that the fee award be increased to \$30,500,000  
24 such that these expenses are offset by the fee award. An award of \$30,500,000 in fees would  
25 represent a multiplier of 5.26 above the lodestar, well within the range approved by this Court in its  
26 April 17, 2020 Order when it awarded Class Counsel fees of \$89 million. *See* Dkt. No. 427, at 36  
27 (noting that multipliers of 13.42, 15.42, and 18.52 "are still within the surveyed acceptable range in  
28 the Ninth Circuit."). In either scenario, Class Counsel should not be penalized for incurring \$5.3



1 million in liabilities for the benefit of Class Members, which dramatically and directly increased  
2 the value of the recovery for the benefit of the Class.

3 I declare under penalty of perjury under the laws of the United States and the State of  
4 California that the foregoing is true and correct. Executed on August 19, 2021 at New York, NY.

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## SETTLEMENT AGREEMENT AND RELEASE

This Settlement Agreement and Release (the “Agreement”) is entered into as of the date of the last signature hereto once fully executed (the “Effective Date”) by and between Ignacio Perez (“PEREZ”, as defined further below), KBR, Inc., d/b/a Rash Curtis & Associates (“RASH CURTIS”, as defined further below), and Indian Harbor Insurance Company (“INDIAN HARBOR”, as defined further below). The above-identified parties are sometimes individually referred to as “Party” or collectively referred to as the “Parties.”

### RECITALS

A. WHEREAS, INDIAN HARBOR issued policies of insurance to RASH CURTIS (the “Policies”, as defined further herein);

B. WHEREAS, on June 17, 2016, Ignacio Perez and two other plaintiffs, on behalf of themselves and a putative class, filed a Class Action Complaint against RASH CURTIS, alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.*, among other statutes, in Case Number 4:16-cv-03396-YGR, filed in the United States District Court for the Northern District of California (the “Underlying Lawsuit”, as defined further herein);

C. WHEREAS, on September 6, 2017, the court granted class certification and appointed Ignacio Perez as the Class Representative in the Underlying Lawsuit [ECF No. 81];

D. WHEREAS, on May 13, 2019, the jury in the Underlying Lawsuit returned a verdict in favor of Ignacio Perez and the four certified classes that Ignacio Perez represented [ECF No. 347];

E. WHEREAS, on September 9, 2019, the court in the Underlying Lawsuit entered Final Judgment, consistent with the jury’s verdict, ordering that each member of the classes shall recover from RASH CURTIS the amount of \$500 per call made in violation of the TCPA for an aggregated award in favor of the classes of \$267,349,000 and, as to Ignacio Perez’s individual claim under the TCPA, ordering that Ignacio Perez, individually, shall recover \$500 per call made in violation of the TCPA for an aggregate award in favor of Ignacio Perez individually of \$7,000, with post-judgment interest on the jury’s award at a rate of 2.36% per annum [ECF No. 370];

F. WHEREAS, on May 4, 2020, after post-judgment motions, the court in the Underlying Lawsuit entered an amended Final Judgment in favor of the classes and against RASH CURTIS for \$267,349,000, with post-judgment interest on the jury’s award at a rate of 2.36% per annum running from September 9, 2019, and awarding class counsel Bursor & Fisher, P.A., attorneys’ fees of 33.33 percent of the award (\$89,116,333.33) [ECF No. 430];

G. WHEREAS, on October 11, 2019, RASH CURTIS entered into an “Assignment of Cause of Action in Exchange for Covenant Not to Execute” with Ignacio Perez, on behalf of himself and the certified class in the Underlying Lawsuit (“Assignment”, as defined further herein), which provided in Paragraph 40 as follows:

In consideration of Perez's covenants and undertakings hereunder, RASH CURTIS HEREBY ASSIGNS AND TRANSFERS TO PEREZ all claims and causes of action Rash Curtis may have or hereafter acquire against XL based on XL's failure and refusal to settle with Perez as hereinabove recited, except any claim for emotional distress or punitive damages against XL based on said acts.

H. WHEREAS, on October 17, 2019, plaintiff in the Underlying Lawsuit filed a Notice of Motion and Motion to Approve the October 11, 2019 Assignment [ECF No. 386];

I. WHEREAS, on October 25, 2019, the court in the Underlying Lawsuit entered an Order to Approve the October 11, 2019 Assignment pursuant to Fed. R. Civ. P. 23(d)(1)(C), subject to the following two conditions:

(1) Plaintiff, through Class Counsel, shall promptly notify the Court of the recovery, if any, obtained on behalf of Class Members as a result of the Assignment; and

(2) Any recovery obtained as a result of the Assignment shall be held in trust until this Court approves a fair, reasonable, and adequate method for distributing the proceeds of the recovery to Class Members.

[ECF No. 392];

J. WHEREAS, on November 5, 2019, PEREZ filed a lawsuit against INDIAN HARBOR, styled *Perez v. Indian Harbor Insurance Company, et al.*, Case No. 4:19-cv-07288-YGR, in the United States District Court for the Northern District of California ("Bad Faith Lawsuit", as defined further herein);

K. WHEREAS, after motions, PEREZ filed an Amended Complaint in the Bad Faith Lawsuit on May 18, 2020, with a single cause of action for Breach of Contract, based on INDIAN HARBOR's alleged breach of Policy No. MPP9032852, "including but not limited to the implied covenant of good faith and fair dealing" based on an alleged "bad faith failure to settle a class action lawsuit within policy limits and refusal to negotiate settlement" and attaching the Assignment as Exhibit 1 to the Amended Complaint;

L. WHEREAS, INDIAN HARBOR filed an Answer on June 1, 2020 and an Amended Answer on June 22, 2020 in the Bad Faith Lawsuit;

M. WHEREAS, PEREZ and INDIAN HARBOR have completed fact and expert discovery in the Bad Faith Lawsuit;

N. WHEREAS, INDIAN HARBOR disputes that it is liable to PEREZ or RASH CURTIS in the Bad Faith Lawsuit, the Underlying Lawsuit or otherwise;

O. WHEREAS, the Parties wish to resolve the disagreements between them asserted in, based upon, arising out of, or in any way involving or relating to the Underlying Lawsuit, Bad Faith Lawsuit, the Assignment, or the Policies, and the Parties shall each release, discharge, acquit,

compromise, and settle all Claims against one another asserted in, based upon, arising out of, or in any way involving or relating to the Underlying Lawsuit, the Bad Faith Lawsuit, the Assignment, or the Policies.

### **AGREEMENT**

NOW, THEREFORE, based on the foregoing Recitals, and in consideration of the mutual covenants, promises and agreements reflected herein, the Parties hereto agree as follows:

1. **Recitals.** The Parties incorporate the foregoing Recitals and the facts set forth therein and expressly make those facts a substantive part of this Agreement.

2. **Definitions.** The following terms shall have the following meanings solely for the purposes of this Agreement:

- a. "INDIAN HARBOR" means: (i) Indian Harbor Insurance Company; (ii) X.L. America, Inc.; (iii) XL Group, Ltd.; (iv) any past, present, and future affiliates, direct and indirect parents, subsidiaries, divisions, partners, owners and principals of any of the foregoing listed in (i) through (iii) of this paragraph; (v) any past, present, and future officers, directors, employees, agents, representatives, partners, owners, principals, members, shareholders, insurers, and attorneys of any of the foregoing listed in (i) through (iv) of this paragraph; and (vi) any past, present, and future predecessors, successors, beneficiaries, heirs, assigns, executors, trustees, and administrators of any of the foregoing listed in (i) through (v) of this paragraph.
- b. "PEREZ" means: (i) Ignacio Perez; on behalf of himself and the certified classes as defined in the Final Judgment in the Underlying Lawsuit; (ii) Ignacio Perez's attorneys or other representatives; (iii) any of Ignacio Perez's beneficiaries, heirs, assigns, executors, trustees, and administrators; (iv) Omni Bridgeway (Fund 4) Invt. 5 L.P.; (v) any past, present, and future affiliates, direct and indirect parents, subsidiaries, divisions, partners, owners and principals of Omni Bridgeway (Fund 4) Invt. 5 L.P.; (vi) any past, present, and future officers, directors, employees, agents, representatives, partners, owners, principals, members, shareholders, insurers, and attorneys of any of the foregoing listed in (iv) and (v) of this paragraph; and (vii) any past, present, and future predecessors, successors, beneficiaries, heirs, assigns, executors, trustees, and administrators of any of the foregoing listed in (iv) through (vi) of this paragraph.
- c. "RASH CURTIS" means: (i) KBR, Inc., d/b/a Rash Curtis & Associates; (ii) any past, present, and future affiliates, direct and indirect parents, subsidiaries, divisions, partners, owners and principals of any of the foregoing listed in (i) of this paragraph, including but not limited to any person or entity listed or named as a named insured, insured, or additional insured in the Policies and any person or entity that is, was, or may claim to be a named insured, insured, or additional

insured under or arising out of the Policies or otherwise claims any coverage, rights, or benefits under or arising out the Policies; (iii) any past, present, and future officers, directors, employees, agents, representatives, partners, owners, principals, members, shareholders, and attorneys of any of the foregoing listed in (i) or (ii) of this paragraph, including but not limited to any person or entity listed or named as a named insured, insured, or additional insured of the Policies and any person or entity that is, was, or may claim to be a named insured, insured, or additional insured under or arising out of the Policies or otherwise claims any coverage, rights, or benefits under or arising out of the Policies; and (iv) any past, present, and future predecessors, successors, beneficiaries, heirs, assigns, executors, trustees, and administrators of any of the foregoing listed in (i), (ii), or (iii) of this paragraph.

- d. “Assignment” means the October 11, 2019 “Assignment of Cause of Action in Exchange for Covenant Not to Execute” between PEREZ and RASH CURTIS (and any prior version of such assignment), and all allegations and claims asserted in or that could have been asserted in same and the Court Order in the Underlying Lawsuit granting the Motion to Approve the October 11, 2019 Assignment [ECF No. 392].
- e. “Bad Faith Lawsuit” means *Perez v. Indian Harbor Insurance Company, et al.*, Case No. 4:19-cv-07288-YGR, filed in the United States District Court for the Northern District of California, and all allegations, causes of action, or claims asserted in or that could have been asserted in same.
- f. “Claims” means the assertion of any right, including but not limited to any and all actual or potential, threatened or alleged, past, present, or future claims, actions, counts, cross-claims, counter-claims, third party claims, rights, obligations, liabilities, duties, demands, requests, lawsuits, petitions, administrative proceedings, notices, letters, statutory or regulatory obligations, orders, directives, arbitrations, mediations, controversies, agreements, promises, representations, causes of action and any other assertions of liability, obligations, judgments, damages, costs, fees (including attorneys’ fees), expenses, interest (including prejudgment or post-judgment interest), or interests or demands of any type, nature, or kind, whether legal or equitable, and whether currently known or unknown, fixed or contingent, mature or not mature, liquidated or unliquidated, direct or consequential, foreseen or unforeseen and whether sounding in tort, contract, equity, nuisance, trespass, negligence, strict liability, product liability or any other statutory, regulatory, administrative or common law cause of action of any type, nature, or kind.
- g. “Class Counsel” means the firm Bursor & Fisher, P.A. and each and every attorney who worked on or is working on the Underlying Lawsuit on behalf of plaintiffs and the classes’ members in that lawsuit including, without limitation, Scott Bursor, Timothy Fisher, and Yeremey Krivoshey.

- h. “Defense Counsel” means: (1) the firm Ellis Law Group LLP and each and every attorney from that firm who worked on or is working on the Underlying Lawsuit on behalf of RASH CURTIS, including without limitation Mark Ellis, Anthony Valenti, Amanda Griffith, and Andrew Steinheimer; and (2) the firm Horvitz & Levy LLP and each and every attorney from that firm who worked on or is working on the Underlying Lawsuit on behalf of RASH CURTIS, including without limitation Robert Wright, Felix Shafir, and Rebecca Powell.
- i. “Payment Trigger Date” means the date when all of the following events have occurred: (a) the Agreement has been executed by all Parties; (b) INDIAN HARBOR receives a W-9 and wire information for the Administrator to which the Settlement Amount is to be paid; and (c) the court in the Underlying Lawsuit enters an Approval Order as specified in section 4 and the order becomes final. The Approval Order becomes “final” for purposes of this Agreement when the later of the following events occurs: (1) in the event there are no objections to the motion for distribution approval, the day the court issues an order granting approval; (2) in the event an objection to the motion for distribution approval is made, the period for filing any appeal, writ, or other appellate proceeding opposing the Approval Order has elapsed without any appeal, writ, or other appellate proceeding having been filed; (3) any appeal, writ, or other appellate proceeding opposing the Approval Order has been dismissed finally and conclusively with no right by any appellant or objector to pursue further remedies or relief; or (4) any appeal, writ, or other appellate proceeding has upheld the Approval Order with no right by any appellant or objector to pursue further remedies or relief. In this regard, it is the intention of the Parties that the Agreement shall not require payment until the court’s Approval Order is completely final, and there is no further recourse by an appellant or objector who seeks to contest the Approval Order. The occurrence of the Payment Trigger Date is a prerequisite to any obligation of INDIAN HARBOR to pay the Settlement Amount.
- j. “Policies” means: (1) Policy No. MPP9032852 issued by Indian Harbor Insurance Company to “KBR, INC. DBA RASH CURTIS & ASSOCIATES”, in effect November 1, 2015 to November 1, 2016; (2) Policy No. MPP903285201 issued by Indian Harbor Insurance Company to “KBR, INC. DBA RASH CURTIS & ASSOCIATES”, in effect November 1, 2016 to November 1, 2017; (3) Policy No. MPP903285202 issued by Indian Harbor Insurance Company to “KBR, INC. DBA RASH CURTIS & ASSOCIATES”, in effect November 1, 2017 to November 1, 2018; (4) Policy No. MPP903285203 issued by Indian Harbor Insurance Company to “KBR, INC. DBA RASH CURTIS & ASSOCIATES”, in effect November 1, 2018 to November 1, 2019; and (5) any other insurance policies issued at any time by INDIAN HARBOR to KBR, Inc. dba Rash Curtis & Associates.
- k. “Underlying Lawsuit” means *McMillion, et al. v. Rash Curtis & Associates*, Case No. 4:16-cv-03396-YGR, filed in the United States District Court for the

Northern District of California, and the appeal of same, Case No. 20-15946, filed in the United States Court of Appeals for the Ninth Circuit, and all allegations, causes of action, or claims asserted in or that could have been asserted in same.

3. Cash Consideration.

a. INDIAN HARBOR shall pay \$75,600,000 (the “Settlement Amount”), to be held in trust by PEREZ through the class action administrator approved in the Underlying Lawsuit (the “Administrator”) within 21 calendar days after the Payment Trigger Date. PEREZ agrees to accept the Settlement Amount as full satisfaction of the Final Judgment in the Underlying Action. Such payment will exhaust any and all remaining limits of liability of Policy No. MPP9032852, and the Parties agree that Policy No. MPP9032852 shall have no further payment obligations after such payment.

b. No monetary payment will be made by INDIAN HARBOR to RASH CURTIS.

4. Requirement of Approval Order. Within 10 business days of this Agreement being fully executed by all Parties, PEREZ shall file in the Underlying Lawsuit a notice of motion and motion for the court to approve the distribution of the Settlement Amount (“Motion”). The Motion shall request an order that is final and appealable (“Approval Order”), making the following findings: (1) confirmation of the prior approval of the Assignment; (2) approval that PEREZ’s entry into this Agreement as fiduciary and class representative for the class was authorized and fair, reasonable, and equitable; (3) approval of the Administrator for distribution of the Settlement Amount; (4) approval of plan for distribution of the Settlement Amount as fair, reasonable and adequate; (5) determination that the Final Judgment is deemed satisfied upon the Administrator’s receipt of the Settlement Amount; and (6) dismissal of the Bad Faith Lawsuit with prejudice, per the Agreement. RASH CURTIS shall file a statement of joinder to the Motion.

5. Nullification of the Agreement. If:

a. the court in the Underlying Lawsuit should for any reason decline to approve or issue the Approval Order as set forth in section 4 or approval of the Approval Order is reversed, modified, or declared or rendered void; or

b. any appeal of the Approval Order is filed, and within 30 days thereafter PEREZ gives notice of his election to nullify this Agreement;

then the Agreement shall be considered null and void, and neither the Agreement nor any of the related negotiations or proceedings shall be of any force or effect, and the Parties shall stand in the same position, without prejudice, as if the Agreement had never been entered. Notwithstanding the foregoing, the Parties may attempt in good faith to cure any



perceived defects to facilitate approval or otherwise amend this Agreement to address such developments.

6. Disposition of Lawsuits.

- a. Within 5 business days of the Effective Date, PEREZ and INDIAN HARBOR agree to file a stipulation and proposed order: (1) vacating the trial date and all pre-trial dates in the Bad Faith Lawsuit, to be reset if this Agreement becomes null and void; and (2) for dismissal of the Bad Faith Lawsuit with prejudice, with each side to bear its own fees and costs (including the costs of each side's experts that were deposed by the other side) as between each other, that shall become effective and will be entered by the court upon notice of the Administrator's receipt of the Settlement Amount.
- b. Within 5 business days of the Effective Date, RASH CURTIS and INDIAN HARBOR shall direct Defense Counsel to notify the Ninth Circuit Court of Appeals of a contingent settlement pursuant to the Agreement and to request a postponement of oral argument in the pending appeal of the Underlying Lawsuit. RASH CURTIS and INDIAN HARBOR agree to dismiss the pending appeal of the Underlying Lawsuit within 5 business days after notice of the Administrator's receipt of the Settlement Amount.
- c. Within 5 business days of the Effective Date, RASH CURTIS shall retain independent defense counsel for the trial court proceedings in the Underlying Lawsuit and have such counsel substitute in as counsel of record in the trial court in place of Defense Counsel that currently are counsel of record in such court. INDIAN HARBOR agrees to pay RASH CURTIS's choice of independent counsel for the reasonable and necessary amounts incurred in defending RASH CURTIS in the Underlying Lawsuit through conclusion of that lawsuit, provided such amounts do not exceed \$25,000 and consistent with section 3.a., *above*, all invoices are received at least 21 calendar days before the Settlement Amount is due to be paid. Such amounts shall be invoiced monthly, and payment shall be due within 30 days of INDIAN HARBOR's receipt of such invoice. In no event will INDIAN HARBOR have any obligation to pay for the defense of RASH CURTIS by its choice of independent counsel as provided in this paragraph in excess of \$25,000.

7. Release.

- a. Each of the Parties hereby fully and forever releases, acquits, and discharges each other Party, Class Counsel, and Defense Counsel from, and covenants not to sue (except as necessary to enforce this Agreement) each other Party, Class Counsel, and Defense Counsel for, any and all Claims that the releasing Party had, now has, or hereafter may have, that are asserted in, based upon, arise out of, or in any way involve or relate to the Underlying Lawsuit, the Bad Faith Lawsuit, the Assignment, or the Policies, including but not limited to any and

all Claims for (i) any coverage, rights, breaches, or benefits under or arising out of the Policies asserted in, based upon, arising out of, or in any way involving or relating to the Underlying Lawsuit, the Bad Faith Lawsuit, or the Assignment, or (ii) any act, error, omission, breach of contract, breach of promise, breach of duty (including but not limited to any duty of good faith and fair dealing, fiduciary duty, statutory, regulatory, administrative, or common law duty), fraud, bad faith, unfair or deceptive insurance or trade practices, extra-contractual, or misconduct of any type, nature, or kind in any handling, evaluating, investigating, adjusting, litigating, or resolving the Underlying Lawsuit, including without limitation as asserted in, based upon, arising out of, or in any way involving or relating to the Underlying Lawsuit, the Bad Faith Lawsuit, the Assignment, or the Policies.

- b. Each of the Parties understands, acknowledges, and agrees that this Agreement shall be effective as a full, final, and complete release and accord and satisfaction of each and every Claim asserted in, based upon, arising out of, or in any way involving or relating to the Underlying Lawsuit, Bad Faith Lawsuit, the Assignment, or the Policies, except as specifically set forth in this Agreement. In furtherance of this intention and except as set forth in section 7.c., *below*, each of the Parties expressly waives and releases any and all rights that each of the Parties had, now has, or hereafter may have under Section 1542 of the California Civil Code and any similar rights that existed, now exist, or hereafter may exist in any other state, jurisdiction, or territory or under any other court decision, statute, regulation, or law.

Section 1542 of the California Civil Code provides in relevant part as follows:

**A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.**

Each of the Parties understands, acknowledges, and agrees to the significance and consequences of this waiver. Each of the Parties further understands, acknowledges, and agrees that this waiver is an essential and material term of this Agreement, and that this Agreement would not have been entered by the Parties without this waiver. As a result, each of the Parties hereby assumes full responsibility for this waiver, and hereby fully and forever releases, acquits, and discharges any and all, Claims that may hereafter occur or arise or that later become known to the Party.

Each of the Parties understands, acknowledges, and agrees that each of the Parties is aware that facts or circumstances may hereafter be discovered or exist

in addition to or different from those now known or believed to be true with respect to this Agreement, but that it is the intention of each of the Parties to enter into the releases in this Agreement, and thus all such releases shall remain in effect as full, final, and complete releases notwithstanding any such later discovery or existence of any such additional or different fact or circumstance.

Each of the Parties understands, acknowledges, represents, and agrees that this waiver was separately bargained for and that each of the Parties has consulted with counsel of its choice regarding this waiver. Each of the Parties understands, acknowledges, represents, and agrees that this waiver shall be given full force and effect in accordance with each and every term and condition of this waiver, including but not limited to those terms and conditions relating to the waiver of unknown or unsuspected Claims.

- c. Notwithstanding the foregoing, the releases above shall not include nor be construed to include any release by or of the other members of the four certified classes in the Underlying Lawsuit.
- d. Each of the Parties hereby represents and warrants that: (i) each of the Parties has the sole, full, and complete right, interest, authority, control, and capacity as to any and all of the Claims, including but not limited to sole, full, and complete right, interest, authority, control, and capacity as to any and all Claims asserted in, based upon, arising from, or in any way involving or relating to the Underlying Lawsuit, the Bad Faith Lawsuit, the Assignment, or the Policies; (ii) no other person or entity, including but not limited to any creditor, lienholder, or attorney, has any right, interest, authority, control, or capacity as to any Claims or the Underlying Lawsuit, the Bad Faith Lawsuit, the Assignment, or the Policies; (iii) each of the Parties has the sole, full, and complete right, interest, authority, control, and capacity as to execution of this Agreement on behalf of all of the persons and entities described as above with respect to each Party; and (iv) each of the Parties has not in any manner assigned, pledged or otherwise transferred to any person or entity any right, interest, authority, control, or capacity as to any Claims or the Underlying Lawsuit, the Bad Faith Lawsuit, the Assignment, or the Policies, except that this provision does not apply to the Assignment itself or the litigation funding agreement with Omni Bridgeway (Fund 4) Invt. 5 L.P.

8. Fair Settlement. The Parties and their respective counsel believe and warrant that this Agreement reflects a fair, reasonable, and adequate settlement of the Bad Faith Lawsuit, and have arrived at this Agreement through arms-length negotiations, taking into account all relevant factors, current and potential.

9. Acknowledgment – Representations and Warranties. Each of the Parties specifically represents and warrants to each of the other Parties that it has not been induced to enter into this Agreement by any act, omission, statement, or representation of any type, nature, or kind, other than any matter, statement, or representation specifically stated in writing in this Agreement.

Each Party has read this Agreement and understands its terms, conditions, and provisions. No Party, nor any of its officers, directors, employees, attorneys, agents, representatives, partners, principals, shareholders, administrators, or trustees, has made any representations or warranties not contained in writing in this Agreement to another Party. This Agreement has been negotiated at arms-length between persons knowledgeable in the matters dealt with herein and in any rights each may have.

10. Non-Admission of Liability.

- a. It is expressly understood, acknowledged, and agreed by the Parties that (a) entering into this Agreement, and (b) each of the terms, conditions, and provisions of this Agreement (including the releases of any Claims), constitute the compromise of disputed Claims as between the Parties, and the compromise is made solely for the purpose of avoiding the risk, time and expense involved in further prosecution or defense of any Claims released in this Agreement. It is further expressly understood and agreed by the Parties that (a) the fact that the Parties have entered into this Agreement, and (b) any of the terms, conditions, or provisions of this Agreement (including the releases of any Claims), are not intended to be, and shall not be, construed as an admission of liability on the part of any Party, or an admission of liability with respect to any Claims released herein.
- b. The Parties expressly understand, acknowledge, and agree that this settlement is a compromise of disputed allegations and is not to be construed as an admission of liability on the part of INDIAN HARBOR for any purpose, by whom liability is expressly denied. The Parties further understand, acknowledge and agree that this compromise and settlement carries no precedential value and shall not be treated or viewed as precedent-setting in any way in the adjustment of any potential present or future Claims, including but not limited to any potential Claims that present facts and circumstances that are the same or similar to the facts and circumstances presented by the subject Claims. This Agreement and the settlement which led to it are entirely without prejudice to the future interpretation by INDIAN HARBOR of any contracts, agreements, relationships, or arrangements. The Parties further understand, acknowledge, and agree that they may not base any claim of waiver or estoppel in any other matter upon execution of this Agreement, or the payment of consideration described herein.
- c. It is expressly understood, acknowledged, and agreed by the Parties that this Agreement is not to be relied upon by any third party and that it carries no precedential value and shall not be relied upon by any person or entity as evidence of any obligation by any party other than the obligations contained in this Agreement.

11. No Assignment. Each Party warrants and represents that it has made no assignment, voluntary or involuntary, of all or any part of the Claims released herein to any other

persons or entities, except that this provision does not apply to the Assignment or the litigation funding agreement with Omni Bridgeway (Fund 4) Inv. 5 L.P.

12. Representation by Attorneys. Each Party to this Agreement hereby acknowledges that Party's representation by an attorney or attorneys in connection with this Agreement. Each Party to this Agreement further acknowledges that the full import of the provisions of this Agreement has been explained to that Party by his, her, or its attorneys. Each Party enters into this Agreement knowingly, intelligently, and voluntarily. In addition, each and all the provisions of this Agreement are acceptable to each Party to this Agreement and are fully agreed and understood.

13. Severability. If any term, condition, or provision of this Agreement as applied to any Party or to any circumstances shall be adjudged by a court to be void and unenforceable, then such term, condition, or provision should be severed and inoperative, and the same shall in no way affect any other provision to this Agreement, the application of such provision in any other circumstances, or the validity or enforceability of the Agreement as a whole, and the other provisions to this Agreement should be liberally construed in order to carry out the intentions of the Parties as nearly as may be possible (including without limitation that the releases in this Agreement should be given the broadest possible interpretation). Upon such determination that any term, condition, or provision is void and unenforceable, the court or other tribunal making such determination is authorized and instructed to modify this Agreement so as to effect the original intent of the Parties as closely as possible so that the transactions and agreements contemplated herein are consummated as originally contemplated to the fullest extent possible, including without limitation that the releases in this Agreement should be given the broadest possible interpretation.

14. Warranty of Signatories. Each signatory of this Agreement warrants that he or she is legally competent and authorized to execute this Agreement on behalf of the Party whose name is subscribed at or above the signatory's signature. Each Party to this Agreement acknowledges and agrees that one signature on behalf of a corporate Party to this Agreement is sufficient to legally bind that entity to the terms and conditions of this Agreement.

15. Counterparts and Facsimile or Electronic Signatures. This Agreement may be executed in counterparts, and facsimile or electronically transmitted original signatures shall be deemed originals, all of which taken together shall constitute one and the same Agreement.

16. Binding on Successors. This Agreement is binding on and shall inure to the benefit of the Parties, their respective heirs, successors, assigns and representatives.

17. Construction of Agreement. Where the context requires, the singular shall be deemed to include the plural and *vice versa*; and use of the masculine, feminine, or neutral gender shall be deemed to include every gender. Headings and titles to sections are for reference only, and do not constitute parts of this Agreement.

18. Entire Agreement. This Agreement constitutes the entire and exclusive agreement between the Parties pertaining to the subject matter hereof and supersedes any and all prior or contemporaneous agreements, understandings, promises, representations, warranties, covenants, negotiations and discussions, whether oral or written, whether express, implied or apparent in connection with the subject matter hereof, except that this paragraph shall not apply to the Assignment or the litigation funding agreement with Omni Bridgeway (Fund 4) Inv. 5 L.P. No supplements or modifications or waivers or terminations of this Agreement shall be binding unless executed in writing by the Party to be bound.

19. Interpretation. Each Party acknowledges and agrees that it has been given the opportunity to independently review this Agreement with legal counsel or has the requisite experience and sophistication to understand, interpret and agree to the particular language of the provisions hereof and does so understand and agree. Each Party represents that it participated in the negotiation and drafting of this Agreement, and as a result, each Party to this Agreement shall be considered as a draftsman of said Agreement. This Agreement shall not be construed in favor of or against any Party hereto, but shall be construed as if all Parties to this Agreement prepared the Agreement.

20. Execution of Document(s) and Cooperation through Dismissal of Bad Faith Lawsuit. The Parties agree to cooperate fully and execute and deliver any and all documents and instruments and to take all additional actions which may be reasonably necessary or appropriate to give full force and effect to the terms and intent of this Agreement. PEREZ and INDIAN HARBOR agree that they intend there will be no further litigation activity in the Bad Faith Lawsuit as of the Effective Date (except as necessary to implement this Agreement or as required by the Court), unless and until this Agreement is rendered null and void.

21. Non-waiver of Provisions of Agreement. No waiver of any provisions of this Agreement shall be deemed or shall constitute a waiver of any other provision (whether or not similar), nor shall such waiver constitute a continuing waiver unless otherwise expressly provided in writing. No breach of any portion hereof can be waived unless in writing. Waiver of any one breach of any provision in this Agreement shall not be deemed to be a waiver of any other breach of the same or other provisions hereof.

22. Governing Law and Jurisdiction. This Agreement is made and is deemed to be performed in California, and shall be construed in accordance with the laws of the State of California. Any action to enforce any provision in this agreement shall be brought within a court of competent jurisdiction located in the State of California.

23. Notice. Any notices or communications required or permitted to be given by this Agreement must be (a) given in writing, and (b) personally delivered or mailed by US Certified or Registered Mail, postage prepaid, or transmitted by facsimile or email to the party to whom such notice or communication is directed, to the following addresses:

**To PEREZ:**  
Scott A. Bursor  
Bursor & Fisher, P.A.

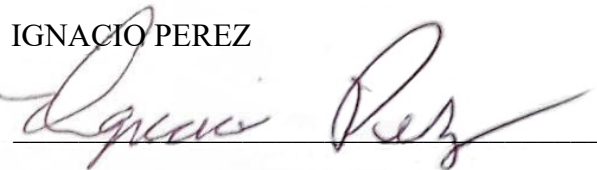
701 Brickell Avenue, Suite 1420  
Miami, FL 33131  
scott@bursor.com

**To RASH CURTIS:**  
Amanda N. Griffith  
Berman Berman Berman Schneider & Lowary LLP  
2390 Professional Drive  
Roseville, CA 95661  
angriffith@b3law.com

**To INDIAN HARBOR:**  
Max H. Stern  
Duane Morris LLP  
One Market, Spear Tower, Suite 2200  
San Francisco, CA 94105  
mhstern@duanemorris.com

IN WITNESS WHEREOF, the Parties have caused this Agreement to be entered into and executed and have signed their respective names after having read the foregoing Agreement and while fully understanding it.

Dated: August 13, 2021

IGNACIO PEREZ  


By: Ignacio Perez

Its: N/A

Dated: August \_\_, 2021

OMNI BRIDGEWAY (FUND 4) INVT. 5 L.P.

By: \_\_\_\_\_

Its: \_\_\_\_\_

Dated: August \_\_, 2021

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

By: Terrence Paff

701 Brickell Avenue, Suite 1420  
Miami, FL 33131  
scott@bursor.com

**To RASH CURTIS:**  
Amanda N. Griffith  
Berman Berman Berman Schneider & Lowary LLP  
2390 Professional Drive  
Roseville, CA 95661  
angriffith@b3law.com

**To INDIAN HARBOR:**  
Max H. Stern  
Duane Morris LLP  
One Market, Spear Tower, Suite 2200  
San Francisco, CA 94105  
mhstern@duanemorris.com

IN WITNESS WHEREOF, the Parties have caused this Agreement to be entered into and executed and have signed their respective names after having read the foregoing Agreement and while fully understanding it.

Dated: August \_\_, 2021

IGNACIO PEREZ

\_\_\_\_\_

By: Ignacio Perez

Its: N/A

Dated: August 12, 2021

OMNI BRIDGEWAY (FUND 4) INVT. 5 L.P.

  
\_\_\_\_\_

By: Christopher J. Young

Its: General Counsel, North America

Dated: August \_\_, 2021

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

\_\_\_\_\_

By: Terrence Paff



701 Brickell Avenue, Suite 1420  
Miami, FL 33131  
scott@bursor.com

**To RASH CURTIS:**  
Amanda N. Griffith  
Berman Berman Berman Schneider & Lowary LLP  
2390 Professional Drive  
Roseville, CA 95661  
angriffith@b3law.com

**To INDIAN HARBOR:**  
Max H. Stern  
Duane Morris LLP  
One Market, Spear Tower, Suite 2200  
San Francisco, CA 94105  
mhstern@duanemorris.com

IN WITNESS WHEREOF, the Parties have caused this Agreement to be entered into and executed and have signed their respective names after having read the foregoing Agreement and while fully understanding it.

Dated: August \_\_, 2021

IGNACIO PEREZ

\_\_\_\_\_

By: Ignacio Perez

Its: N/A

Dated: August \_\_, 2021

OMNI BRIDGEWAY (FUND 4) INVT. 5 L.P.


\_\_\_\_\_

By: \_\_\_\_\_

Its: \_\_\_\_\_

Dated: August 10, 2021

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

  
\_\_\_\_\_

By: Terrence Paff

Dated: August 10, 2021

Its: President, CEO, and Owner

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

Natasha Paff

By: Natasha Paff

Its: Chief Operations Officer

Dated: August \_\_, 2021

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

\_\_\_\_\_

By: Bob Keith

Its: Vice President of Operations

Dated: August \_\_, 2021

INDIAN HARBOR INSURANCE COMPANY

\_\_\_\_\_

By: \_\_\_\_\_

Its: \_\_\_\_\_

Dated: August \_\_, 2021

Its: President, CEO, and Owner

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

By: Natasha Paff

Its: Chief Operations Officer

Dated: August 10, 2021

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES



By: Bob Keith

Its: Vice President of Operations

Dated: August \_\_, 2021

INDIAN HARBOR INSURANCE COMPANY

By: \_\_\_\_\_

Its: \_\_\_\_\_

Dated: August \_\_, 2021

Its: President, CEO, and Owner

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

By: Natasha Paff

Its: Chief Operations Officer

Dated: August \_\_, 2021

KBR, Inc. d/b/a/ RASH CURTIS & ASSOCIATES

By: Bob Keith

Its: Vice President of Operations

Dated: August 11<sup>th</sup>, 2021

INDIAN HARBOR INSURANCE COMPANY

James M. DiVirgilio

By: James M. DiVirgilio

Its: Chief Regional Claims Officer Americas





[www.bursor.com](http://www.bursor.com)

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MIAMI, FL 33131

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NEW YORK, NY 10019

1990 NORTH CALIFORNIA BLVD.  
WALNUT CREEK, CA 94596

## **FIRM RESUME**

With offices in Florida, New York, and California, BURSOR & FISHER lawyers have represented both plaintiffs and defendants in state and federal courts throughout the country.

The lawyers at our firm have an active civil trial practice, having won multi-million dollar verdicts or recoveries in six of six class action jury trials since 2008. Our most recent class action trial victory came in May 2019 in *Perez v. Rash Curtis & Associates*, in which Mr. Bursor served as lead trial counsel and won a \$267 million jury verdict against a debt collector found to have violated the Telephone Consumer Protection Act.

In August 2013 in *Ayyad v. Sprint Spectrum L.P.*, in which Mr. Bursor served as lead trial counsel, we won a jury verdict defeating Sprint's \$1.06 billion counterclaim and securing the class's recovery of more than \$275 million in cash and debt relief.

In *Thomas v. Global Vision Products, Inc. (II)*, we obtained a \$50 million jury verdict in favor of a certified class of 150,000 purchasers of the Avacor Hair Regrowth System. The legal trade publication VerdictSearch reported that this was the second largest jury verdict in California in 2009, and the largest in any class action.

The lawyers at our firm have an active class action practice and have won numerous appointments as class counsel to represent millions of class members, including customers of Honda, Verizon Wireless, AT&T Wireless, Sprint, Haier America, and Michaels Stores as well as purchasers of Avacor™, Hydroxycut, and Sensa™ products. Bursor & Fisher lawyers have been court-appointed Class Counsel or Interim Class Counsel in:

1. *O'Brien v. LG Electronics USA, Inc.* (D.N.J. Dec. 16, 2010) to represent a certified nationwide class of purchasers of LG French-door refrigerators,
2. *Ramundo v. Michaels Stores, Inc.* (N.D. Ill. June 8, 2011) to represent a certified nationwide class of consumers who made in-store purchases at Michaels Stores using a debit or credit card and had their private financial information stolen as a result,
3. *In re Haier Freezer Consumer Litig.* (N.D. Cal. Aug. 17, 2011) to represent a certified class of purchasers of mislabeled freezers from Haier America Trading, LLC,
4. *Rodriguez v. CitiMortgage, Inc.* (S.D.N.Y. Nov. 14, 2011) to represent a certified nationwide class of military personnel against CitiMortgage for illegal foreclosures,
5. *Rossi v. The Procter & Gamble Co.* (D.N.J. Jan. 31, 2012) to represent a certified nationwide class of purchasers of Crest Sensitivity Treatment & Protection toothpaste,

6. *Dzielak v. Whirlpool Corp. et al.* (D.N.J. Feb. 21, 2012) to represent a proposed nationwide class of purchasers of mislabeled Maytag Centennial washing machines from Whirlpool Corp., Sears, and other retailers,
7. *In re Sensa Weight Loss Litig.* (N.D. Cal. Mar. 2, 2012) to represent a certified nationwide class of purchasers of Sensa weight loss products,
8. *In re Sinus Buster Products Consumer Litig.* (E.D.N.Y. Dec. 17, 2012) to represent a certified nationwide class of purchasers,
9. *Ebin v. Kangadis Food Inc.* (S.D.N.Y. Feb. 25, 2014) to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
10. *Forcellati v. Hyland's, Inc.* (C.D. Cal. Apr. 9, 2014) to represent a certified nationwide class of purchasers of children's homeopathic cold and flu remedies,
11. *Ebin v. Kangadis Family Management LLC, et al.* (S.D.N.Y. Sept. 18, 2014) to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,
12. *In re Scotts EZ Seed Litig.* (S.D.N.Y. Jan. 26, 2015) to represent a certified class of purchasers of Scotts Turf Builder EZ Seed,
13. *Dei Rossi v. Whirlpool Corp., et al.* (E.D. Cal. Apr. 28, 2015) to represent a certified class of purchasers of mislabeled KitchenAid refrigerators from Whirlpool Corp., Best Buy, and other retailers,
14. *Hendricks v. StarKist Co.* (N.D. Cal. July 23, 2015) to represent a certified nationwide class of purchasers of StarKist tuna products,
15. *In re NVIDIA GTX 970 Graphics Card Litig.* (N.D. Cal. May 8, 2015) to represent a proposed nationwide class of purchasers of NVIDIA GTX 970 graphics cards,
16. *Melgar v. Zicam LLC, et al.* (E.D. Cal. March 30, 2016) to represent a certified ten-jurisdiction class of purchasers of Zicam Pre-Cold products,
17. *In re Trader Joe's Tuna Litigation* (C.D. Cal. December 21, 2016) to represent purchaser of allegedly underfilled Trader Joe's canned tuna.
18. *In re Welspun Litigation* (S.D.N.Y. January 26, 2017) to represent a proposed nationwide class of purchasers of Welspun Egyptian cotton bedding products,
19. *Retta v. Millennium Products, Inc.* (C.D. Cal. January 31, 2017) to represent a certified nationwide class of Millennium kombucha beverages,
20. *Moeller v. American Media, Inc.,* (E.D. Mich. June 8, 2017) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
21. *Hart v. BHH, LLC* (S.D.N.Y. July 7, 2017) to represent a nationwide class of purchasers of Bell & Howell ultrasonic pest repellers,
22. *McMillion v. Rash Curtis & Associates* (N.D. Cal. September 6, 2017) to represent a certified nationwide class of individuals who received calls from Rash Curtis & Associates,
23. *Lucero v. Solarcity Corp.* (N.D. Cal. September 15, 2017) to represent a certified nationwide class of individuals who received telemarketing calls from Solarcity Corp.,

24. *Taylor v. Trusted Media Brands, Inc.* (S.D.N.Y. Oct. 17, 2017) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
25. *Gasser v. Kiss My Face, LLC* (N.D. Cal. Oct. 23, 2017) to represent a proposed nationwide class of purchasers of cosmetic products,
26. *Gastelum v. Frontier California Inc.* (S.F. Superior Court February 21, 2018) to represent a certified California class of Frontier landline telephone customers who were charged late fees,
27. *Williams v. Facebook, Inc.* (N.D. Cal. June 26, 2018) to represent a proposed nationwide class of Facebook users for alleged privacy violations,
28. *Ruppel v. Consumers Union of United States, Inc.* (S.D.N.Y. July 27, 2018) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
29. *Bayol v. Health-Ade* (N.D. Cal. August 23, 2018) to represent a proposed nationwide class of Health-Ade kombucha beverage purchasers,
30. *West v. California Service Bureau* (N.D. Cal. September 12, 2018) to represent a certified nationwide class of individuals who received calls from California Service Bureau,
31. *Gregorio v. Premier Nutrition Corporation* (S.D.N.Y. Sept. 14, 2018) to represent a nationwide class of purchasers of protein shake products,
32. *Moeller v. Advance Magazine Publishers, Inc. d/b/a Condé Nast* (S.D.N.Y. Oct. 24, 2018) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
33. *Bakov v. Consolidated World Travel Inc. d/b/a Holiday Cruise Line* (N.D. Ill. Mar. 21, 2019) to represent a certified class of individuals who received calls from Holiday Cruise Line,
34. *Martinelli v. Johnson & Johnson* (E.D. Cal. March 29, 2019) to represent a certified class of purchasers of Benecol spreads labeled with the representation “No Trans Fat,”
35. *Edwards v. Hearst Communications, Inc.* (S.D.N.Y. April 24, 2019) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
36. *Galvan v. Smashburger* (C.D. Cal. June 25, 2019) to represent a proposed class of purchasers of Smashburger’s “Triple Double” burger,
37. *Kokoszki v. Playboy Enterprises, Inc.* (E.D. Mich. Feb. 7, 2020) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
38. *Russett v. The Northwestern Mutual Life Insurance Co.* (S.D.N.Y. May 28, 2020) to represent a class of insurance policyholders that were allegedly charged unlawful paper billing fees,
39. *In re: Metformin Marketing and Sales Practices Litigation* (D.N.J. June 3, 2020) to represent a proposed nationwide class of purchasers of generic diabetes medications that were contaminated with a cancer-causing carcinogen,
40. *Hill v. Spirit Airlines, Inc.* (S.D. Fla. July 21, 2020) to represent a proposed nationwide class of passengers whose flights were cancelled by Spirit Airlines



due to the novel coronavirus, COVID-19, and whose tickets were not refunded,

41. *Kramer v. Alterra Mountain Co.* (D. Colo. July 31, 2020) to represent a proposed nationwide class of purchasers to recoup the unused value of their Ikon ski passes after Alterra suspended operations at its ski resorts due to the novel coronavirus, COVID-19,
42. *Qureshi v. American University* (D.D.C. July 31, 2020) to represent a proposed nationwide class of students for tuition and fee refunds after their classes were moved online by American University due to the novel coronavirus, COVID-19,
43. *Hufford v. Maxim Inc.* (S.D.N.Y. Aug. 13, 2020) to represent a class of magazine subscribers under the Michigan Preservation of Personal Privacy Act,
44. *Desai v. Carnegie Mellon University* (W.D. Pa. Aug. 26, 2020) to represent a proposed nationwide class of students for tuition and fee refunds after their classes were moved online by Carnegie Mellon University due to the novel coronavirus, COVID-19,
45. *Heigl v. Waste Management of New York, LLC* (E.D.N.Y. Aug. 27, 2020) to represent a class of insurance policyholders that were allegedly charged unlawful paper billing fees,
46. *Stellato v. Hofstra University* (E.D.N.Y. Sept. 18, 2020) to represent a proposed nationwide class of students for tuition and fee refunds after their classes were moved online by Hofstra University due to the novel coronavirus, COVID-19.
47. *Kaupelis v. Harbor Freight Tools USA, Inc.* (C.D. Cal. Sept. 23, 2020), to represent consumers who purchased defective chainsaws.
48. *Soo v. Lorex Corporation* (N.D. Cal. Sept. 23, 2020), to represent consumers whose security cameras were intentionally rendered non-functional by manufacturer.
49. *Miranda v. Golden Entertainment (NV), Inc.* (D. Nev. Dec. 17, 2020), to represent consumers and employees whose personal information was exposed in a data breach.
50. *Benbow v. SmileDirectClub, Inc.* (Cir. Ct. Cook Cnty. Feb. 4, 2021), to represent a certified nationwide class of individuals who received text messages from SmileDirectClub, in alleged violation of the Telephone Consumer Protection Act.
51. *Suren v. DSV Solutions, LLC* (Cir. Ct. DuPage Cnty. Apr. 8, 2021), to represent a certified class of employees who used a fingerprint clock-in system, in alleged violation of the Illinois Biometric Information Privacy Act.
52. *De Lacour v. Colgate-Palmolive Co.* (S.D.N.Y. Apr. 23, 2021), to represent a certified class of consumers who purchased allegedly “natural” Tom’s of Maine products.
53. *Wright v. Southern New Hampshire University* (D.N.H. Apr. 26, 2021), to represent a certified nationwide class of students for tuition and fee refunds after their classes were moved online by Southern New Hampshire University due to the novel coronavirus, COVID-19.
54. *Sahlin v. Hospital Housekeeping Systems, LLC* (Cir. Ct. Williamson Cnty. May 21, 2021), to represent a certified class of employees who used a

fingerprint clock-in system, in alleged violation of the Illinois Biometric Information Privacy Act.

### **SCOTT A. BURSOR**

Mr. Bursor has an active civil trial practice, having won multi-million verdicts or recoveries in six of six civil jury trials since 2008. Mr. Bursor's most recent victory came in May 2019 in *Perez v. Rash Curtis & Associates*, in which Mr. Bursor served as lead trial counsel and won a \$267 million jury verdict against a debt collector for violations of the Telephone Consumer Protection Act (TCPA).

In *Ayyad v. Sprint Spectrum L.P.* (2013), where Mr. Bursor served as lead trial counsel, the jury returned a verdict defeating Sprint's \$1.06 billion counterclaim and securing the class's recovery of more than \$275 million in cash and debt relief.

In *Thomas v. Global Vision Products, Inc.* (2009), the jury returned a \$50 million verdict in favor of the plaintiff and class represented by Mr. Bursor. The legal trade publication VerdictSearch reported that this was the second largest jury verdict in California in 2009.

Class actions are rarely tried to verdict. Other than Mr. Bursor and his partner Mr. Fisher, we know of no lawyer that has tried more than one class action to a jury. Mr. Bursor's perfect record of six wins in six class action jury trials, with recoveries ranging from \$21 million to \$299 million, is unmatched by any other lawyer. Each of these victories was hard-fought against top trial lawyers from the biggest law firms in the United States.

Mr. Bursor graduated from the University of Texas Law School in 1996. He served as Articles Editor of the Texas Law Review, and was a member of the Board of Advocates and Order of the Coif. Prior to starting his own practice, Mr. Bursor was a litigation associate at a large New York based law firm where he represented telecommunications, pharmaceutical, and technology companies in commercial litigation.

Mr. Bursor is a member of the state bars of New York, Florida, and California, as well as the bars of the United States Court of Appeals for the Second, Third, Fourth, Sixth, Ninth and Eleventh Circuits, and the bars of the United States District Courts for the Southern and Eastern Districts of New York, the Northern, Central, Southern and Eastern Districts of California, the Southern and Middle Districts of Florida, and the Eastern District of Michigan.

### **Representative Cases**

Mr. Bursor was appointed lead or co-lead class counsel to the largest, 2nd largest, and 3rd largest classes ever certified. Mr. Bursor has represented classes including more than 160 million class members, roughly 1 of every 2 Americans. Listed below are recent cases that are representative of Mr. Bursor's practice:

Mr. Bursor negotiated and obtained court-approval for two landmark settlements in *Nguyen v. Verizon Wireless* and *Zill v. Sprint Spectrum* (the largest and 2nd largest classes ever certified). These settlements required Verizon and Sprint to open their wireless networks to

third-party devices and applications. These settlements are believed to be the most significant legal development affecting the telecommunications industry since 1968, when the FCC's Carterfone decision similarly opened up AT&T's wireline telephone network.

Mr. Bursor was the lead trial lawyer in *Ayyad v. Sprint Spectrum, L.P.* representing a class of approximately 2 million California consumers who were charged an early termination fee under a Sprint cellphone contract, asserting claims that such fees were unlawful liquidated damages under the California Civil Code, as well as other statutory and common law claims. After a five-week combined bench-and-jury trial, the jury returned a verdict in June 2008 and the Court issued a Statement of Decision in December 2008 awarding the plaintiffs \$299 million in cash and debt cancellation. Mr. Bursor served as lead trial counsel for this class again in 2013 during a month-long jury trial in which Sprint asserted a \$1.06 billion counterclaim against the class. Mr. Bursor secured a verdict awarding Sprint only \$18.4 million, the exact amount calculated by the class's damages expert. This award was less than 2% of the damages Sprint sought, less than 6% of the amount of the illegal termination fees Sprint charged to class members. In December 2016, after more than 13 years of litigation, the case was settled for \$304 million, including \$79 million in cash payments plus \$225 million in debt cancellation.

Mr. Bursor was the lead trial lawyer in *White v. Cellco Partnership d/b/a Verizon Wireless* representing a class of approximately 1.4 million California consumers who were charged an early termination fee under a Verizon cellphone contract, asserting claims that such fees were unlawful liquidated damages under the California Civil Code, as well as other statutory and common law claims. In July 2008, after Mr. Bursor presented plaintiffs' case-in-chief, rested, then cross-examined Verizon's principal trial witness, Verizon agreed to settle the case for a \$21 million cash payment and an injunction restricting Verizon's ability to impose early termination fees in future subscriber agreements.

Mr. Bursor was the lead trial lawyer in *Thomas v. Global Visions Products Inc.* Mr. Bursor represented a class of approximately 150,000 California consumers who had purchased the Avacor® hair regrowth system. In January 2008, after a four-week combined bench-and-jury trial, Mr. Bursor obtained a \$37 million verdict for the class, which the Court later increased to \$40 million.

Mr. Bursor was appointed class counsel and was elected chair of the Official Creditors' Committee in *In re Nutraquest Inc.*, a Chapter 11 bankruptcy case before Chief Judge Garrett E. Brown, Jr. (D.N.J.) involving 390 ephedra-related personal injury and/or wrongful death claims, two consumer class actions, four enforcement actions by governmental agencies, and multiple adversary proceedings related to the Chapter 11 case. Working closely with counsel for all parties and with two mediators, Judge Nicholas Politan (Ret.) and Judge Marina Corodemus (Ret.), the committee chaired by Mr. Bursor was able to settle or otherwise resolve every claim and reach a fully consensual Chapter 11 plan of reorganization, which Chief Judge Brown approved in late 2006. This settlement included a \$12.8 million recovery to a nationwide class of consumers who alleged they were defrauded in connection with the purchase of Xenadrine® dietary supplement products.

Mr. Bursor was the lead trial lawyer in *In re: Pacific Bell Late Fee Litigation*. After filing the first class action challenging Pac Bell's late fees in April 2010, winning a contested

motion to certify a statewide California class in January 2012, and defeating Pac Bell's motion for summary judgment in February 2013, Mr. Bursor obtained final approval of the \$38 million class settlement. The settlement, which Mr. Bursor negotiated the night before opening statements were scheduled to commence, included a \$20 million cash payment to provide refunds to California customers who paid late fees on their Pac Bell wireline telephone accounts, and an injunction that reduced other late fee charges by \$18.6 million.

### **L. TIMOTHY FISHER**

L. Timothy Fisher has an active practice in consumer class actions and complex business litigation and has also successfully handled a large number of civil appeals.

Mr. Fisher has been actively involved in numerous cases that resulted in multi-million dollar recoveries for consumers and investors. Mr. Fisher has handled cases involving a wide range of issues including nutritional labeling, health care, telecommunications, corporate governance, unfair business practices and consumer fraud. With his partner Scott A. Bursor, Mr. Fisher has tried five class action jury trials, all of which produced successful results. In *Thomas v. Global Vision Products*, Mr. Fisher obtained a jury award of \$50,024,611 — the largest class action award in California in 2009 and the second-largest jury award of any kind.

Mr. Fisher was admitted to the State Bar of California in 1997. He is also a member of the bars of the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Northern, Central, Southern and Eastern Districts of California. Mr. Fisher taught appellate advocacy at John F. Kennedy University School of Law in 2003 and 2004. In 2010, he contributed jury instructions, a verdict form and comments to the consumer protection chapter of Justice Elizabeth A. Baron's California Civil Jury Instruction Companion Handbook (West 2010). In January 2014, Chief Judge Claudia Wilken of the United States District Court for the Northern District of California appointed Mr. Fisher to a four-year term as a member of the Court's Standing Committee on Professional Conduct.

Mr. Fisher received his Juris Doctor from Boalt Hall at the University of California at Berkeley in 1997. While in law school, he was an active member of the Moot Court Board and participated in moot court competitions throughout the United States. In 1994, Mr. Fisher received an award for Best Oral Argument in the first-year moot court competition.

In 1992, Mr. Fisher graduated with highest honors from the University of California at Berkeley and received a degree in political science. Prior to graduation, he authored an honors thesis for Professor Bruce Cain entitled "The Role of Minorities on the Los Angeles City Council." He is also a member of Phi Beta Kappa.

### **Representative Cases**

*Thomas v. Global Vision Products, Inc.* (Alameda County Superior Court). Mr. Fisher litigated claims against Global Vision Products, Inc. and other individuals in connection with the sale and marketing of a purported hair loss remedy known as Avacor. The case lasted more than seven years and involved two trials. The first trial resulted in a verdict for plaintiff and the class in the

amount of \$40,000,000. The second trial resulted in a jury verdict of \$50,024,611, which led to a \$30 million settlement for the class.

*In re Cellphone Termination Fee Cases - Handset Locking Actions* (Alameda County Superior Court). Mr. Fisher actively worked on five coordinated cases challenging the secret locking of cell phone handsets by major wireless carriers to prevent consumers from activating them on competitive carriers' systems. Settlements have been approved in all five cases on terms that require the cell phone carriers to disclose their handset locks to consumers and to provide unlocking codes nationwide on reasonable terms and conditions. The settlements fundamentally changed the landscape for cell phone consumers regarding the locking and unlocking of cell phone handsets.

*In re Cellphone Termination Fee Cases - Early Termination Fee Cases* (Alameda County Superior Court and Federal Communications Commission). In separate cases that are a part of the same coordinated litigation as the Handset Locking Actions, Mr. Fisher actively worked on claims challenging the validity under California law of early termination fees imposed by national cell phone carriers. In one of those cases, against Verizon Wireless, a nationwide settlement was reached after three weeks of trial in the amount of \$21 million. In a second case, which was tried to verdict, the Court held after trial that the \$73 million of flat early termination fees that Sprint had collected from California consumers over an eight-year period were void and unenforceable.

#### *Selected Published Decisions*

*Melgar v. Zicam LLC*, 2016 WL 1267870 (E.D. Cal. Mar. 30, 2016) (certifying 10-jurisdiction class of purchasers of cold remedies, denying motion for summary judgment, and denying motions to exclude plaintiff's expert witnesses).

*Salazar v. Honest Tea, Inc.*, 2015 WL 7017050 (E.D. Cal. Nov. 12, 2015) (denying motion for summary judgment).

*Dei Rossi v. Whirlpool Corp.*, 2015 WL 1932484 (E.D. Cal. Apr. 27, 2015) (certifying California class of purchasers of refrigerators that were mislabeled as Energy Star qualified).

*Bayol v. Zipcar, Inc.*, 78 F.Supp.3d 1252 (N.D. Cal. 2015) (denying motion to dismiss claims alleging unlawful late fees under California Civil Code § 1671).

*Forcellati v. Hyland's, Inc.*, 2015 WL 9685557 (C.D. Cal. Jan. 12, 2015) (denying motion for summary judgment in case alleging false advertising of homeopathic cold and flu remedies for children).

*Bayol v. Zipcar, Inc.*, 2014 WL 4793935 (N.D. Cal. Sept. 25, 2014) (denying motion to transfer venue pursuant to a forum selection clause).

*Forcellati v. Hyland's Inc.*, 2014 WL 1410264 (C.D. Cal. Apr. 9, 2014) (certifying nationwide class of purchasers of homeopathic cold and flu remedies for children).

*Hendricks v. StarKist Co.*, 30 F.Supp.3d 917 (N.D. Cal. 2014) (denying motion to dismiss in case alleging underfilling of 5-ounce cans of tuna).

*Dei Rossi v. Whirlpool Corp.*, 2013 WL 5781673 (E.D. Cal. October 25, 2013) (denying motion to dismiss in case alleging that certain KitchenAid refrigerators were misrepresented as Energy Star qualified).

*Forcellati v. Hyland's Inc.*, 876 F.Supp.2d 1155 (C.D. Cal. 2012) (denying motion to dismiss complaint alleging false advertising regarding homeopathic cold and flu remedies for children).

*Clerkin v. MyLife.com*, 2011 WL 3809912 (N.D. Cal. August 29, 2011) (denying defendants' motion to dismiss in case alleging false and misleading advertising by a social networking company).

*In re Cellphone Termination Fee Cases*, 186 Cal.App.4th 1380 (2010) (affirming order approving \$21 million class action settlement).

*Gatton v. T-Mobile USA, Inc.*, 152 Cal.App.4th 571 (2007) (affirming order denying motion to compel arbitration).

### Selected Class Settlements

*Melgar v. Zicam* (Eastern District of California) - \$16 million class settlement of claims alleging cold medicine was ineffective.

*Gastelum v. Frontier California Inc.* (San Francisco Superior Court) - \$10.9 million class action settlement of claims alleging that a residential landline service provider charged unlawful late fees.

*West v. California Service Bureau, Inc.* (Northern District of California) - \$4.1 million class settlement of claims under the Telephone Consumer Protection Act.

*Gregorio v. Premier Nutrition Corp.* (Southern District of New York) - \$9 million class settlement of false advertising claims against protein shake manufacturer.

*Morris v. SolarCity Corp.* (Northern District of California) - \$15 million class settlement of claims under the Telephone Consumer Protection Act.

*Retta v. Millennium Products, Inc.* (Central District of California) - \$8.25 million settlement to resolve claims of bottled tea purchasers for alleged false advertising.

*Forcellati v. Hyland's* (Central District of California) – nationwide class action settlement providing full refunds to purchasers of homeopathic cold and flu remedies for children.

*Dei Rossi v. Whirlpool* (Eastern District of California) – class action settlement providing \$55 cash payments to purchasers of certain KitchenAid refrigerators that allegedly mislabeled as Energy Star qualified.

*In Re NVIDIA GTX 970 Graphics Chip Litigation* (Northern District of California) - \$4.5 million class action settlement of claims alleging that a computer graphics card was sold with false and misleading representations concerning its specifications and performance.

*Hendricks v. StarKist Co.* (Northern District of California) – \$12 million class action settlement of claims alleging that 5-ounce cans of tuna were underfilled.

*In re Zaksorn v. American Honda Motor Co.* Honda (Eastern District of California) – nationwide settlement providing for brake pad replacement and reimbursement of out-of-pocket expenses in case alleging defective brake pads on Honda Civic vehicles manufactured between 2006 and 2011.

*Correa v. Sensa Products, LLC* (Los Angeles Superior Court) - \$9 million settlement on behalf of purchasers of the Sensa weight loss product.

*In re Pacific Bell Late Fee Litigation* (Contra Costa County Superior Court) - \$38.6 million settlement on behalf of Pac Bell customers who paid an allegedly unlawful late payment charge.

*In re Haier Freezer Consumer Litigation* (Northern District of California) - \$4 million settlement, which provided for cash payments of between \$50 and \$325.80 to class members who purchased the Haier HNCM070E chest freezer.

*Thomas v. Global Vision Products, Inc.* (Alameda County Superior Court) - \$30 million settlement on behalf of a class of purchasers of a hair loss remedy.

*Guyette v. Viacom, Inc.* (Alameda County Superior Court) - \$13 million settlement for a class of cable television subscribers who alleged that the defendant had improperly failed to share certain tax refunds with its subscribers.

### **JOSEPH I. MARCHESE**

Joseph I. Marchese is a Partner with Bursor & Fisher, P.A. Joe focuses his practice on consumer class actions, employment law disputes, and commercial litigation. He has represented corporate and individual clients in a wide array of civil litigation, and has substantial trial and appellate experience.

Joe has diverse experience in litigating and resolving consumer class actions involving claims of mislabeling, false or misleading advertising, privacy violations, data breach claims, and violations of the Servicemembers Civil Relief Act.

Joe also has significant experience in multidistrict litigation proceedings. Recently, he served on the Plaintiffs' Executive Committee in *In Re: Blue Buffalo Company, Ltd. Marketing And Sales Practices Litigation*, MDL No. 2562, which resulted in a \$32 million consumer class settlement. Currently, he serves on the Plaintiffs' Steering Committee for Economic Reimbursement in *In Re: Valsartan Products Liability Litigation*, MDL No. 2875.

Joe is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York, the Eastern District of New York, and the Eastern District of Michigan, as well as the United States Court of Appeals for the Second Circuit.

Joe graduated from Boston University School of Law in 2002 where he was a member of The Public Interest Law Journal. In 1998, Joe graduated with honors from Bucknell University.

**Selected Published Decisions:**

*Boelter v. Hearst Communications, Inc.*, 269 F. Supp. 3d 172 (S.D.N.Y. Sept. 7, 2017), granting plaintiff's motion for partial summary judgment on state privacy law violations in putative class action.

*Boelter v. Hearst Communications, Inc.*, 192 F. Supp. 3d 427 (S.D.N.Y. June 17, 2016), denying publisher's motion to dismiss its subscriber's allegations of state privacy law violations in putative class action.

*In re Scotts EZ Seed Litigation*, 304 F.R.D. 397 (S.D.N.Y. 2015), granting class certification of false advertising and other claims brought by New York and California purchasers of grass seed product.

*Ebin v. Kangadis Food Inc.*, 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

*In re Michaels Stores Pin Pad Litigation*, 830 F. Supp. 2d 518 (N.D. Ill. 2011), denying retailer's motion to dismiss its customers' state law consumer protection and privacy claims in data breach putative class action.

**Selected Class Settlements:**

*Edwards v. Hearst Communications, Inc.*, Case No. 15-cv-09279-AT (S.D.N.Y. 2019) – final approval granted for \$50 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*Moeller v. Advance Magazine Publishers, Inc. d/b/a Condé Nast*, Case No. 15-cv-05671-NRB (S.D.N.Y. 2019) – final approval granted for \$13.75 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*In re Scotts EZ Seed Litigation*, Case No. 12-cv-4727-VB (S.D.N.Y. 2018) – final approval granted for \$47 million class settlement to resolve false advertising claims of purchasers of combination grass seed product.

*In Re: Blue Buffalo Marketing And Sales Practices Litigation*, Case No. 14-MD-2562-RWS (E.D. Mo. 2016) – final approval granted for \$32 million class settlement to resolve claims of pet owners for alleged false advertising of pet foods.

*Rodriguez v. Citimortgage, Inc.*, Case No. 11-cv-4718-PGG (S.D.N.Y. 2015) – final approval granted for \$38 million class settlement to resolve claims of military servicemembers for alleged foreclosure violations of the Servicemembers Civil Relief Act, where each class member was entitled to \$116,785 plus lost equity in the foreclosed property and interest thereon.



*O'Brien v. LG Electronics USA, Inc., et al.*, Case No. 10-cv-3733-DMC (D.N.J. 2011) – final approval granted for \$23 million class settlement to resolve claims of Energy Star refrigerator purchasers for alleged false advertising of the appliances' Energy Star qualification.

### **JOSHUA D. ARISOHN**

Joshua D. Arisohn is a Partner with Bursor & Fisher, P.A. Josh has litigated precedent-setting cases in the areas of consumer class actions and terrorism. He participated in the first ever trial to take place under the Anti-Terrorism Act, a statute that affords U.S. citizens the right to assert federal claims for injuries arising out of acts of international terrorism. Josh's practice continues to focus on terrorism-related matters as well as class actions.

Josh is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York and the Eastern District of New York.

Josh previously practiced at Dewey & LeBoeuf LLP and DLA Piper LLP. He graduated from Columbia University School of Law in 2006, where he was a Harlan Fiske Stone Scholar, and received his B.A. from Cornell University in 2002. Josh has been honored as a 2015 and 2016 Super Lawyer Rising Star.

### **Selected Published Decisions:**

*Morris v. SolarCity Corp.*, 2016 WL 1359378 (N.D. Cal. Apr. 4, 2016), denying defendant's motion to dismiss claims that solar company illegally called consumers using an artificial or prerecorded voice and an automatic telephone dialing system.

*Boelter v. Hearst Commc'ns, Inc.*, 192 F. Supp. 3d 427 (S.D.N.Y. 2016), denying defendant's motion to dismiss and finding that the Michigan Video Rental Privacy Act does not violate the First Amendment.

*Edwards v. Oportun, Inc.*, 193 F. Supp. 3d 1096 (N.D. Cal. 2016), denying defendant's motion dismiss and rejecting its argument that providing a class representative with a cashier's check for his individual damages mooted his individual and class claims.

### **Selected Class Settlements:**

*Morris v. SolarCity Corp.*, Case No. 3:15-cv-05107-RS (N.D. Cal.) - final approval granted for \$15 million class settlement to resolve claims under the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227 *et seq.*

### **JOEL D. SMITH**

Joel D. Smith is a Partner with Bursor & Fisher, P.A. Joel's practice focuses on consumer class actions and complex litigation. He has substantial experience in trial and appellate courts across the nation.

Prior to joining Bursor & Fisher, Joel was a litigator at Crowell & Moring, where he represented Fortune 500 companies, privately-held businesses, and public entities in commercial litigation and nationwide class actions. While at Crowell & Moring, Joel litigated some of the firm's most high-profile matters, including several class actions alleging deceptive sales practices with respect to Apple iPhones and iPads, and a class action seeking to hold U.S. energy companies accountable for global warming. In California state court, Joel represented four major U.S. retailers in a case arising from a devastating arson fire and ensuing state of emergency in Roseville, California. That case included crossclaims by the defendant alleging a vast cover-up by the City of Roseville's fire and police departments; the involvement of the federal Bureau of Alcohol, Tobacco, Firearms and Explosives; and settlement on the eve of a trial that was expected to last several months and involve numerous witnesses. Joel also was part of the trial team in a widely publicized trial over the death of a contestant who died after participating in a Sacramento radio station's water drinking contest.

More recently, Joel has represented University of California students in a class action seeking the return of late fees unlawfully collected from students. He also served as interim class counsel in *In re Welspun Litigation* (S.D.N.Y. January 26, 2017), a class action against three of the largest retailers in the United States and one of the largest textile manufacturers in the world, arising from events that one reporter described as the "biggest counterfeit story in retail history."

Joel received both his undergraduate and law degrees from the University of California at Berkeley. While at Berkeley School of Law, he was a member of the California Law Review, received several academic honors, externed for the California Attorney General's office and published an article on climate change policy and litigation.

Joel is admitted to the State Bar of California, as well as the United States Courts of Appeals for the Second, Third and Ninth Circuits; the Northern, Central, Southern and Eastern Districts of California; and is a member of the General Bar of the Northern District of Illinois.

**Selected Published Decisions:**

*Revitch v. DIRECTV, LLC*, --- F.3d --- (9th Cir. 2020), affirming denial of motion to compel arbitration in putative class action alleging unlawful calls under the Telephone Consumer Protection Act.

*Kaupelis v. Harbor Freight Tools USA, Inc.*, 2020 WL 5901116 (C.D. Cal. Sept. 23, 2020), granting class certification of consumer protection claims brought by purchasers of defective chainsaws.

**Selected Class Settlements:**

*Morris v. SolarCity Corp.*, Case No. 3:15-cv-05107-RS (N.D. Cal.) - final approval granted for \$15 million class settlement to resolve claims under the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227 *et seq.*

**NEAL J. DECKANT**

Neal J. Deckant is a Partner with Bursor & Fisher, P.A. Neal focuses his practice on complex business litigation, consumer class actions, and employment law disputes. Prior to joining Bursor & Fisher, Neal counseled low-income homeowners facing foreclosure in East Boston.

In 2015, Neal was defense trial counsel for a law firm and several of its partners in a sexual harassment case brought by a former associate of that firm. The plaintiff's complaint sought \$22 million in compensatory and punitive damages. After a 3-week trial in federal court in New York, the jury returned a verdict of not liable for the federal and state law claims. During the trial, the judge also granted defendants' motion for judgment as a matter of law on the plaintiff's claims for retaliation and defamation. The jury found liability solely under New York City's human rights law, awarding only \$140,000 in damages.

Neal is admitted to the State Bars of California and New York, and is a member of the bars of the United States District Court for the Northern District of California, the United States District Court for the Eastern District of California, the United States District Court for the Central District of California, the United States District Court for the Southern District of California, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the bars of the United States Courts of Appeals for the Second and Ninth Circuits.

Neal received his Juris Doctor from Boston University School of Law in 2011, graduating cum laude with two Dean's Awards. During law school, Neal served as a Senior Articles Editor for the Review of Banking and Financial Law, where he authored two published articles about securitization reforms, both of which were cited by the New York Court of Appeals, the highest court in the state. Neal was also awarded Best Oral Argument in his moot court section, and he served as a Research Assistant for his Securities Regulation professor. Neal has also been honored as a 2014, 2015, 2016, and 2017 Super Lawyers Rising Star. In 2007, Neal graduated with Honors from Brown University with a dual major in East Asian Studies and Philosophy.

**Selected Published Decisions:**

*Martinelli v. Johnson & Johnson*, 2019 WL 1429653 (N.D. Cal. Mar. 29, 2019), granting class certification of false advertising and other claims brought by purchasers of Benecol spreads labeled with the representation "No Trans Fats."

*Dzielak v. Whirlpool Corp.*, 2017 WL 6513347 (D.N.J. Dec. 20, 2017), granting class certification of consumer protection claims brought by purchasers of Maytag Centennial washing machines marked with the "Energy Star" logo.

*Duran v. Obesity Research Institute, LLC*, 204 Cal. Rptr. 3d 896 (Cal. Ct. App. 2016), reversing and remanding final approval of a class action settlement on appeal, regarding allegedly mislabeled dietary supplements, in connection with a meritorious objection.

*Marchuk v. Faruqi & Faruqi, LLP, et al.*, 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting individual and law firm defendants' motion for judgment as a matter of law on plaintiff's claims for retaliation and defamation, as well as for all claims against law firm partners, Nadeem and Lubna Faruqi.

*Ebin v. Kangadis Food Inc.*, 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

*Ebin v. Kangadis Food Inc.*, 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor's motion for summary judgment against nationwide class of purchasers of purported "100% Pure Olive Oil" product.

#### **Selected Class Settlements:**

*In Re NVIDIA GTX 970 Graphics Chip Litigation*, Case No. 15-cv-00760-PJH (N.D. Cal. Dec. 7, 2016) – final approval granted for \$4.5 million class action settlement to resolve claims that a computer graphics card was allegedly sold with false and misleading representations concerning its specifications and performance.

*Hendricks v. StarKist Co.*, 2016 WL 5462423 (N.D. Cal. Sept. 29, 2016) – final approval granted for \$12 million class action settlement to resolve claims that 5-ounce cans of tuna were allegedly underfilled.

*In re: Kangadis Food Inc.*, Case No. 8-14-72649 (Bankr. E.D.N.Y. Dec. 17, 2014) – class action claims resolved for \$2 million as part of a Chapter 11 plan of reorganization, after a corporate defendant filed for bankruptcy, following claims that its olive oil was allegedly sold with false and misleading representations.

#### **Selected Publications:**

Neal Deckant, *X. Reforms of Collateralized Debt Obligations: Enforcement, Accounting and Regulatory Proposals*, 29 Rev. Banking & Fin. L. 79 (2009) (cited in *Quadrant Structured Products Co., Ltd. v. Vertin*, 16 N.E.3d 1165, 1169 n.8 (N.Y. 2014)).

Neal Deckant, *Criticisms of Collateralized Debt Obligations in the Wake of the Goldman Sachs Scandal*, 30 Rev. Banking & Fin. L. 407 (2010) (cited in *Quadrant Structured Products Co., Ltd. v. Vertin*, 16 N.E.3d 1165, 1169 n.8 (N.Y. 2014)); *Lyon Village Venetia, LLC v. CSE Mortgage LLC*, 2016 WL 476694, at \*1 n.1 (Md. Ct. Spec. App. Feb. 4, 2016); Ivan Ascher, *Portfolio Society: On the Capitalist Mode of Prediction*, at 141, 153, 175 (Zone Books / The MIT Press 2016); Devon J. Steinmeyer, *Does State National Bank of Big Spring v. Geithner Stand a Fighting Chance?*, 89 Chi.-Kent. L. Rev. 471, 473 n.13 (2014)).

**YITZCHAK KOPEL**

Yitzchak Kopel is a Partner with Bursor & Fisher, P.A. Yitz focuses his practice on consumer class actions and complex business litigation. He has represented corporate and individual clients before federal and state courts, as well as in arbitration proceedings.

Yitz has substantial experience in successfully litigating and resolving consumer class actions involving claims of consumer fraud, data breaches, and violations of the telephone consumer protection act. Since 2014, Yitz has obtained class certification on behalf of his clients five times, three of which were certified as nationwide class actions. Bursor & Fisher was appointed as class counsel to represent the certified classes in each of the cases.

Yitz is admitted to the State Bars of New York and New Jersey, the bar of the United States Court of Appeals for the Second, Eleventh, and Ninth Circuits, and the bars of the United States District Courts for the Southern District of New York, Eastern District of New York, Eastern District of Missouri, Eastern District of Wisconsin, Northern District of Illinois, and District of New Jersey.

Yitz received his Juris Doctorate from Brooklyn Law School in 2012, graduating *cum laude* with two Dean's Awards. During law school, Yitz served as an Articles Editor for the Brooklyn Law Review and worked as a Law Clerk at Shearman & Sterling. In 2009, Yitz graduated *cum laude* from Queens College with a B.A. in Accounting.

**Selected Published Decisions:**

*Bassaw v. United Industries Corp.*, --- F. Supp. 3d ---, 2020 WL 5117916 (S.D.N.Y. Aug. 31, 2020), denying motion to dismiss claims in putative class action concerning insect foggers.

*Poppiti v. United Industries Corp.*, 2020 WL 1433642 (E.D. Mo. Mar. 24, 2020), denying motion to dismiss claims in putative class action concerning citronella candles.

*Bakov v. Consolidated World Travel, Inc.*, 2019 WL 6699188 (N.D. Ill. Dec. 9, 2019), granting summary judgment on behalf of certified class in robocall class action.

*Krumm v. Kittrich Corp.*, 2019 WL 6876059 (E.D. Mo. Dec. 17, 2019), denying motion to dismiss claims in putative class action concerning mosquito repellent.

*Crespo v. S.C. Johnson & Son, Inc.*, 394 F. Supp. 3d 260 (S.D.N.Y. 2019), denying defendant's motion to dismiss fraud and consumer protection claims in putative class action regarding Raid insect fogger.

*Bakov v. Consolidated World Travel, Inc.*, 2019 WL 1294659 (N.D. Ill. Mar. 21, 2019), certifying a class of persons who received robocalls in the state of Illinois.

*Bourbia v. S.C. Johnson & Son, Inc.*, 375 F. Supp. 3d 454 (S.D.N.Y. 2019), denying defendant's motion to dismiss fraud and consumer protection claims in putative class action regarding mosquito repellent.

*Hart v. BHH, LLC*, 323 F. Supp. 3d 560 (S.D.N.Y. 2018), denying defendants' motion for summary judgment in certified class action involving the sale of ultrasonic pest repellents.

*Hart v. BHH, LLC*, 2018 WL 3471813 (S.D.N.Y. July 19, 2018), denying defendants' motion to exclude plaintiffs' expert in certified class action involving the sale of ultrasonic pest repellents.

*Penrose v. Buffalo Trace Distillery, Inc.*, 2018 WL 2334983 (E.D. Mo. Feb. 5, 2018), denying bourbon producers' motion to dismiss fraud and consumer protection claims in putative class action.

*West v. California Service Bureau, Inc.*, 323 F.R.D. 295 (N.D. Cal. 2017), certifying a nationwide class of "wrong-number" robocall recipients.

*Hart v. BHH, LLC*, 2017 WL 2912519 (S.D.N.Y. July 7, 2017), certifying nationwide class of purchasers of ultrasonic pest repellents.

*Browning v. Unilever United States, Inc.*, 2017 WL 7660643 (C.D. Cal. Apr. 26, 2017), denying motion to dismiss fraud and warranty claims in putative class action concerning facial scrub product.

*Brenner v. Procter & Gamble Co.*, 2016 WL 8192946 (C.D. Cal. Oct. 20, 2016), denying motion to dismiss warranty and consumer protection claims in putative class action concerning baby wipes.

*Hewlett v. Consolidated World Travel, Inc.*, 2016 WL 4466536 (E.D. Cal. Aug. 23, 2016), denying telemarketer's motion to dismiss TCPA claims in putative class action.

*Bailey v. KIND, LLC*, 2016 WL 3456981 (C.D. Cal. June 16, 2016), denying motion to dismiss fraud and warranty claims in putative class action concerning snack bars.

*Hart v. BHH, LLC*, 2016 WL 2642228 (S.D.N.Y. May 5, 2016) denying motion to dismiss warranty and consumer protection claims in putative class action concerning ultrasonic pest repellents.

*Marchuk v. Faruqi & Faruqi, LLP, et al.*, 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting clients' motion for judgment as a matter of law on claims for retaliation and defamation in employment action.

*In re Scotts EZ Seed Litigation*, 304 F.R.D. 397 (S.D.N.Y. 2015), granting class certification of false advertising and other claims brought by New York and California purchasers of grass seed product.

*Brady v. Basic Research, L.L.C.*, 101 F. Supp. 3d 217 (E.D.N.Y. 2015), denying diet pill manufacturers' motion to dismiss its purchasers' allegations for breach of express warranty in putative class action.

*Ward v. TheLadders.com, Inc.*, 3 F. Supp. 3d 151 (S.D.N.Y. 2014), denying online job board's motion to dismiss its subscribers' allegations of consumer protection law violations in putative class action.

*Ebin v. Kangadis Food Inc.*, 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

*Ebin v. Kangadis Food Inc.*, 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor's motion for summary judgment against nationwide class of purchasers of purported "100% Pure Olive Oil" product.

#### **Selected Class Settlements:**

*Hart v. BHH, LLC*, Case No. 1:15-cv-04804 (S.D.N.Y. Sept. 22, 2020), resolving class action claims regarding ultrasonic pest repellers.

*In re: Kangadis Food Inc.*, Case No. 8-14-72649 (Bankr. E.D.N.Y. Dec. 17, 2014), resolving class action claims for \$2 million as part of a Chapter 11 plan of reorganization, after a corporate defendant filed for bankruptcy following the certification of nationwide claims alleging that its olive oil was sold with false and misleading representations.

*West v. California Service Bureau*, Case No. 4:16-cv-03124-YGR (N.D. Cal. Jan. 23, 2019), resolving class action claims against debt-collector for wrong-number robocalls for \$4.1 million.

#### **FREDERICK J. KLORCZYK III**

Frederick J. Klorczyk III is a Partner with Bursor & Fisher, P.A. Fred focuses his practice on complex business litigation and consumer class actions.

Fred has substantial experience in successfully litigating and resolving consumer class actions involving claims of mislabeling, false or misleading advertising, and privacy violations. In 2019, Fred certified both a California and a 10-state express warranty class on behalf of purchasers of a butter substitute. In 2014, Fred served on the litigation team in *Ebin v. Kangadis Food Inc.* At class certification, Judge Rakoff adopted Fred's choice of law fraud analysis and research directly into his published decision certifying a nationwide fraud class.

Fred is admitted to the State Bars of California, New York, and New Jersey, and is a member of the bars of the United States District Courts for the Northern, Central, Eastern, and Southern Districts of California, the Southern, Eastern, and Northern Districts of New York, the District of New Jersey, the Northern District of Illinois, the Eastern District of Missouri, the Eastern District of Wisconsin, and the Eastern District of Michigan, as well as the bars of the United States Court of Appeals for the Second and Ninth Circuits.

Fred received his Juris Doctor from Brooklyn Law School in 2013, graduating *magna cum laude* with two CALI Awards for the highest grade in his classes on conflict of laws and criminal law. During law school, Fred served as an Associate Managing Editor for the Brooklyn

Journal of Corporate, Financial and Commercial Law and as an intern to the Honorable Alison J. Nathan of the United States District Court for the Southern District of New York and the Honorable Janet Bond Arterton of the United States District Court for the District of Connecticut. In 2010, Fred graduated from the University of Connecticut with a B.S. in Finance.

**Selected Published Decisions:**

*Revitch v. New Moosejaw, LLC*, 2019 WL 5485330 (N.D. Cal. Oct. 23, 2019), denying defendants' motions to dismiss consumer's allegations of state privacy law violations in putative class action.

*In re Welspun Litigation*, 2019 WL 2174089 (S.D.N.Y. May 20, 2019), denying retailers' and textile manufacturer's motion to dismiss consumers' allegations of false advertising relating to purported "100% Egyptian Cotton" linen products.

*Martinelli v. Johnson & Johnson*, 2019 WL 1429653 (E.D. Cal. Mar. 29, 2019), granting class certification of California false advertising claims and multi-state express warranty claims brought by purchasers of a butter substitute.

*Porter v. NBTY, Inc.*, 2016 WL 6948379 (N.D. Ill. Nov. 28, 2016), denying supplement manufacturer's motion to dismiss consumers' allegations of false advertising relating to whey protein content.

*Weisblum v. Prophase Labs, Inc.*, 88 F. Supp. 3d 282 (S.D.N.Y. 2015), denying supplement manufacturer's motion to dismiss consumers' allegations of false advertising relating to a homeopathic cold product.

*In re Scotts EZ Seed Litigation*, 304 F.R.D. 397 (S.D.N.Y. 2015), granting class certification of false advertising and other claims brought by New York and California purchasers of grass seed product.

*Marchuk v. Faruqi & Faruqi, LLP, et al.*, 100 F. Supp. 3d 302 (S.D.N.Y. 2015), granting individual and law firm defendants' motion for judgment as a matter of law on plaintiff's claims for retaliation and defamation, as well as for all claims against law firm partners, Nadeem and Lubna Faruqi.

*Ebin v. Kangadis Food Inc.*, Case No. 13-4775 (2d Cir. Apr. 15, 2015), denying olive oil manufacturer's Rule 23(f) appeal following grant of nationwide class certification.

*Ebin v. Kangadis Food Inc.*, 297 F.R.D. 561 (S.D.N.Y. 2014), granting nationwide class certification of false advertising and other claims brought by purchasers of purported "100% Pure Olive Oil" product.

*Ebin v. Kangadis Food Inc.*, 2014 WL 737878 (S.D.N.Y. Feb. 25, 2014), denying distributor's motion for summary judgment against nationwide class of purchasers of purported "100% Pure Olive Oil" product.



**Selected Class Settlements:**

*Gregorio v. Premier Nutrition Corp.*, Case No. 17-cv-05987-AT (S.D.N.Y. 2019) – final approval granted for \$9 million class settlement to resolve claims of protein shake purchasers for alleged false advertising.

*Ruppel v. Consumers Union of United States, Inc.*, Case No. 16-cv-02444-KMK (S.D.N.Y. 2018) – final approval granted for \$16.375 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*In Re: Blue Buffalo Marketing And Sales Practices Litigation*, Case No. 14-MD-2562-RWS (E.D. Mo. 2016) –final approval granted for \$32 million class settlement to resolve claims of pet owners for alleged false advertising of pet foods.

*In re: Kangadis Food Inc.*, Case No. 8-14-72649 (Bankr. E.D.N.Y. Dec. 17, 2014) – resolved class action claims for \$2 million as part of a Chapter 11 plan of reorganization, after a corporate defendant filed for bankruptcy following the certification of nationwide claims alleging that its olive oil was sold with false and misleading representations.

**YEREMEY O. KRIVOSHEY**

Yeremey O. Krivoshey is a Partner with Bursor & Fisher, P.A. Mr. Krivoshey has particular expertise in COVID-19 related consumer litigation, unlawful fees and liquidated damages in consumer contracts, TCPA cases, product recall cases, and fraud and false advertising litigation. He has represented clients in a wide array of civil litigation, including appeals before the Ninth Circuit.

Mr. Krivoshey served as trial counsel with Mr. Bursor in *Perez. v. Rash Curtis & Associates*, where, in May 2019, the jury returned a verdict for \$267 million in statutory damages under the Telephone Consumer Protection Act. Since 2017, Mr. Krivoshey has secured over \$100 million for class members in consumer class settlements. Mr. Krivoshey has been honored multiple times as a Super Lawyers Rising Star.

Mr. Krivoshey is admitted to the State Bar of California. He is also a member of the bars of the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California, as well as the District of Colorado.

Mr. Krivoshey graduated from New York University School of Law in 2013, where he was a Samuel A. Herzog Scholar. Prior to Bursor & Fisher, P.A., Mr. Krivoshey worked as a Law Clerk at Vladeck, Waldman, Elias & Engelhard, P.C, focusing on employment discrimination and wage and hour disputes. In law school, he has also interned at the American Civil Liberties Union and the United States Department of Justice. In 2010, Mr. Krivoshey graduated *cum laude* from Vanderbilt University.

**Representative Cases:**

*Perez v. Rash Curtis & Associates*, Case No. 16-cv-03396-YGR (N.D. Cal. May 13, 2019). Mr. Krivoshey litigated claims against a national health-care debt collection agency on behalf of people that received autodialed calls on their cellular telephones without their prior express consent. Mr. Krivoshey successfully obtained nationwide class certification, defeated the defendant's motion for summary judgment, won summary judgment as to the issue of prior express consent and the use of automatic telephone dialing systems, and navigated the case towards trial. With his partner, Scott Bursor, Mr. Krivoshey obtained a jury verdict finding that the defendant violated the Telephone Consumer Protection Act ("TCPA") 534,712 times. Under the TCPA, class members are entitled to \$500 per each call made in violation of the TCPA – in this case, \$267 million for 534,712 unlawful calls.

**Selected Published Decisions:**

*Goodrich, et al. v. Alterra Mountain Co., et al.*, 2021 WL 2633326 (D. Col. June 25, 2021), denying ski pass company's motion to dismiss its customers' allegations concerning refunds owed due to cancellation of ski season due to COVID-19.

*Bayol v. Zipcar, Inc.*, 2014 WL 4793935 (N.D. Cal. Sept. 25, 2014), denying enforcement of forum selection clause based on public policy grounds.

*Bayol v. Zipcar, Inc.*, 78 F. Supp. 3d 1252 (N.D. Cal. Jan. 29, 2015), denying car-rental company's motion to dismiss its subscriber's allegations of unlawful late fees.

*Brown v. Comcast Corp.*, 2016 WL 9109112 (C.D. Cal. Aug. 12, 2016), denying internet service provider's motion to compel arbitration of claims alleged under the Telephone Consumer Protection Act.

*Chaisson, et al. v. University of Southern California* (Cal. Sup. Ct. Mar. 25, 2021), denying university's demurrer as to its students' allegations of unfair and unlawful late fees.

*Choi v. Kimberly-Clark Worldwide, Inc.*, 2019 WL 4894120 (C.D. Cal. Aug. 28, 2019), denying tampon manufacturer's motion to dismiss its customer's design defect claims.

*Horanzy v. Vemma Nutrition Co.*, Case No. 15-cv-298-PHX-JJT (D. Ariz. Apr. 16, 2016), denying multi-level marketer's and its chief scientific officer's motion to dismiss their customer's fraud claims.

*McMillion, et al. v. Rash Curtis & Associates*, 2017 WL 3895764 (N.D. Cal. Sept. 6, 2017), granting nationwide class certification of Telephone Consumer Protection Act claims by persons receiving autodialed and prerecorded calls without consent.

*McMillion, et al. v. Rash Curtis & Associates*, 2018 WL 692105 (N.D. Cal. Feb. 2, 2018), granting plaintiffs' motion for partial summary judgment on Telephone Consumer Protection Act violations in certified class action.

*Perez v. Indian Harbor Ins. Co.*, 2020 WL 2322996 (N.D. Cal. May 11, 2020), denying insurance company's motion to dismiss or stay assigned claims of bad faith and fair dealing arising out of \$267 million trial judgment.

*Perez v. Rash Curtis & Associates*, 2020 WL 1904533 (N.D. Cal. Apr. 17, 2020), upholding constitutionality of \$267 million class trial judgment award.

*Salazar v. Honest Tea, Inc.*, 2015 WL 7017050 (E.D. Cal. Nov. 12, 2015), denying manufacturer's motion for summary judgment as to customer's false advertising claims.

**Selected Class Settlements:**

*Strassburger v. Six Flags Theme Parks Inc., et al.* (Ill. Cir. Ct. 2021) pending approval to \$83.6 million settlement to resolve claims of theme park members for alleged wrongful charging of fees during the COVID-19 pandemic.

*Juarez-Segura, et al. v. Western Dental Services, Inc.* (Cal. Sup. Ct. Aug. 9, 2021) granting final approval to \$35 million settlement to resolve claims of dental customers for alleged unlawful late fees.

*Moore v. Kimberly-Clark Worldwide, Inc.* (Ill. Cir. Ct. July 22, 2020) granting final approval to \$11.2 million settlement to resolve claims of tampon purchasers for alleged defective products.

*Retta v. Millennium Prods., Inc.*, 2017 WL 5479637 (C.D. Cal. Aug. 22, 2017) granting final approval to \$8.25 million settlement to resolve claims of kombucha purchasers for alleged false advertising.

*Cortes v. National Credit Adjusters, L.L.C.* (E.D. Cal. Dec. 7, 2020) granting final approval to \$6.8 million settlement to resolve claims of persons who received alleged autodialed calls without prior consent in violation of the TCPA.

*Bayol et al. v. Health-Ade LLC, et al.* (N.D. Cal. Oct. 11, 2019) – granting final approval to \$3,997,500 settlement to resolve claims of kombucha purchasers for alleged false advertising.

**PHILIP L. FRAIETTA**

Philip L. Fraietta is a Partner with Bursor & Fisher, P.A. Phil focuses his practice on data privacy, complex business litigation, consumer class actions, and employment law disputes. Phil has been named a “Rising Star” in the New York Metro Area by Super Lawyers<sup>®</sup> every year since 2019.

Phil has significant experience in litigating consumer class actions, particularly those involving data privacy claims under statutes such as the Michigan Preservation of Personal Privacy Act and the Illinois Biometric Information Privacy Act. Since 2016, Phil has recovered over \$100 million for class members in data privacy class action settlements. In addition to data privacy claims, Phil has significant experience in litigating and settling class action claims involving false or misleading advertising.

Phil is admitted to the State Bars of New York and New Jersey, the bars of the United States District Courts for the Southern District of New York, the Eastern District of New York, the Western District of New York, the Northern District of New York, the District of New

Jersey, the Eastern District of Michigan, the Western District of Michigan, the Central District of Illinois, and the United States Court of Appeals for the Second Circuit. Phil was a Summer Associate with Bursor & Fisher prior to joining the firm.

Phil received his Juris Doctor from Fordham University School of Law in 2014, graduating cum laude. During law school, Phil served as an Articles & Notes Editor for the Fordham Law Review, and published two articles. In 2011, Phil graduated cum laude from Fordham University with a B.A. in Economics.

**Selected Published Decisions:**

*Kolebuck-Utz v. Whitepages Inc.*, 2021 WL 157219 (W.D. Wash. Apr. 22, 2021), denying defendant's motion to dismiss for alleged violations of Ohio's Right to Publicity Law.

*Bergeron v. Rochester Institute of Technology*, 2020 WL 7486682 (W.D.N.Y. Dec. 18, 2020), denying university's motion to dismiss for failure to refund tuition and fees for the Spring 2020 semester in light of the COVID-19 pandemic.

*Porter v. NBTY, Inc.*, 2019 WL 5694312 (N.D. Ill. Nov. 4, 2019), denying supplement manufacturer's motion for summary judgment on consumers' allegations of false advertising relating to whey protein content.

*Boelter v. Hearst Communications, Inc.*, 269 F. Supp. 3d 172 (S.D.N.Y. 2017), granting plaintiff's motion for partial summary judgment on state privacy law violations in putative class action.

*Boelter v. Advance Magazine Publishers Inc.*, 210 F. Supp. 3d 579 (S.D.N.Y. 2016), denying publisher's motion to dismiss its subscriber's allegations of state privacy law violations in putative class action.

**Selected Class Settlements:**

*Edwards v. Hearst Communications, Inc.*, Case No. 15-cv-09279-AT (S.D.N.Y. 2019) – final approval granted for \$50 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*Moeller v. Advance Magazine Publishers, Inc. d/b/a Condé Nast*, Case No. 15-cv-05671-NRB (S.D.N.Y. 2019) – final approval granted for \$13.75 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*Gregorio v. Premier Nutrition Corp.*, Case No. 17-cv-05987-AT (S.D.N.Y. 2019) – final approval granted for \$9 million class settlement to resolve claims of protein shake purchasers for alleged false advertising.

*Ruppel v. Consumers Union of United States, Inc.*, Case No. 16-cv-02444-KMK (S.D.N.Y. 2018) – final approval granted for \$16.375 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*Taylor v. Trusted Media Brands, Inc.*, Case No. 16-cv-01812-KMK (S.D.N.Y. 2018) – final approval granted for \$8.225 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

*Moeller v. American Media, Inc.*, Case No. 16-cv-11367-JEL (E.D. Mich. 2017) – final approval granted for \$7.6 million class settlement to resolve claims of magazine subscribers for alleged statutory privacy violations.

### **SARAH N. WESTCOT**

Sarah N. Westcot is a Partner with Bursor & Fisher, P.A. Ms. Westcot focuses her practice on complex business litigation, consumer class actions, and employment law disputes. She has represented clients in a wide array of civil litigation, and has substantial trial and appellate experience.

Ms. Westcot served as trial counsel in *Ayyad v. Sprint Spectrum L.P.*, where Bursor & Fisher won a jury verdict defeating Sprint's \$1.06 billion counterclaim and securing the class's recovery of more than \$275 million in cash and debt relief.

Ms. Westcot also has significant experience in high-profile, multi-district litigations. She currently serves on the Plaintiffs' Steering Committee in *In re Zantac (Ranitidine) Products Liability Litigation*, MDL No. 2924 (S.D. Florida).

Ms. Westcot is admitted to the State Bars of California and Florida, and is a member of the bars of the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California and the Southern and Middle Districts of Florida.

Ms. Westcot received her Juris Doctor from the University of Notre Dame Law School in 2009. During law school, Ms. Westcot was a law clerk with the Cook County State's Attorney's Office in Chicago and the Santa Clara County District Attorney's Office in San Jose, CA. She graduated with honors from the University of Florida in 2005.

### **ALEC M. LESLIE**

Alec Leslie is an Associate with Bursor & Fisher, P.A. He focuses his practice on consumer class actions, employment law disputes, and complex business litigation.

Alec is admitted to the State Bar of New York and is a member of the bar of the United States District Courts for the Southern and Eastern Districts of New York. Alec was a Summer Associate with Bursor & Fisher prior to joining the firm.

Alec received his Juris Doctor from Brooklyn Law School in 2016, graduating *cum laude*. During law school, Alec served as an Articles Editor for Brooklyn Law Review. In addition, Alec served as an intern to the Honorable James C. Francis for the Southern District of New York and the Honorable Vincent Del Giudice, Supreme Court, Kings County. Alec graduated from the University of Colorado with a B.A. in Philosophy in 2012.

**ANDREW OBERGFELL**

Andrew Obergfell is an Associate with Bursor & Fisher, P.A. Andrew focuses his practice on complex civil litigation and class actions.

Andrew graduated from Drew University with *summa cum laude* distinction. While at Drew University, Andrew was captain of the varsity baseball team. Andrew was inducted into the Phi Beta Kappa honor society and was President of the college's chapter of the Pi Sigma Alpha political science honor society.

Andrew attended Seton Hall University School of Law, where he obtained his law degree with *magna cum laude* distinction, and was inducted into the prestigious Order of the Coif honor society. While in law school, Andrew was an editor and published author for the Seton Hall Law Review, participated in the Impact Litigation Clinic, and was a member of the Interscholastic Moot Court Board. As part of the Interscholastic Moot Court Board, Andrew received the national best-brief award in the 2015 ABA National Appellate Advocacy Competition, as well as the 2015 best student-written brief of the year award as recognized by Scribes, the American Society of Legal Writers.

Prior to joining the firm, Andrew practiced at an AmLaw 100 law firm. He also clerked for The Honorable Douglas M. Fasciale in the New Jersey Superior Court, Appellate Division, in Newark, New Jersey.

**STEPHEN BECK**

Stephen is an Associate with Bursor & Fisher, P.A. Stephen focuses his practice on complex civil litigation and class actions.

Stephen is admitted to the State Bar of Florida and is a member of the bars of the United States District Courts for the Southern and Middle Districts of Florida.

Stephen received his Juris Doctor from the University of Miami School of Law in 2018. During law school, Stephen received an Honors distinction in the Litigation Skills Program and was awarded the Honorable Theodore Klein Memorial Scholarship for excellence in written and oral advocacy. Stephen also received the CALI Award in Legislation for earning the highest grade on the final examination. Stephen graduated from the University of North Florida with a B.A. in Philosophy in 2015.

**BRITTANY SCOTT**

Brittany Scott is an Associate with Bursor & Fisher, P.A. Brittany focuses her practice on complex civil litigation and class actions. Brittany was an intern with Bursor & Fisher prior to joining the firm.

She is admitted to the State Bar of California and is a member of the bars of the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California, the Eastern District of Wisconsin, and the Northern District of Illinois.

Brittany received her Juris Doctor from the University of California, Hastings College of the Law in 2019, graduating *cum laude*. During law school, Brittany was a member of the Constitutional Law Quarterly, for which she was the Executive Notes Editor. Brittany published a note in the Constitutional Law Quarterly entitled “Waiving Goodbye to First Amendment Protections: First Amendment Waiver by Contract.” Brittany also served as a judicial extern to the Honorable Andrew Y.S. Cheng for the San Francisco Superior Court. In 2016, Brittany graduated from the University of California Berkeley with a B.A. in Political Science.

### **MAX ROBERTS**

Max Roberts is an Associate with Bursor & Fisher, P.A. Max focuses his practice on complex civil litigation and class actions. Max was a Summer Associate with Bursor & Fisher prior to joining the firm.

Max is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Northern, Southern, and Eastern Districts of New York.

Max received his Juris Doctor from Fordham University School of Law in 2019, graduating *cum laude*. During law school, Max was a member of Fordham’s Moot Court Board, the Brennan Moore Trial Advocates, and the Fordham Urban Law Journal, for which he published a note entitled *Weaning Drug Manufacturers Off Their Painkiller: Creating an Exception to the Learned Intermediary Doctrine in Light of the Opioid Crisis*. In addition, Max served as an intern to the Honorable Vincent L. Briccetti of the Southern District of New York and the Fordham Criminal Defense Clinic. Max graduated from Johns Hopkins University in 2015 with a B.A. in Political Science.

Outside of the law, Max is an avid triathlete.

### **CHRISTOPHER R. REILLY**

Chris Reilly is an Associate with Bursor & Fisher, P.A. Chris focuses his practice on consumer class actions and complex business litigation.

Chris is admitted to the State Bar of Florida and is a member of the bar of the United States District Courts for the Southern and Middle Districts of Florida.

Chris received his Juris Doctor from Georgetown University Law Center in 2020. During law school, Chris clerked for the Senate Judiciary Committee, where he worked on antitrust and food and drug law matters under Senator Richard Blumenthal. He has also clerked for the Mecklenburg County District Attorney’s Office, the ACLU Prison Project, and the Pennsylvania General Counsel’s Office. Chris served as Senior Editor of Georgetown’s Journal of Law and Public Policy. In 2017, Chris graduated from the University of Florida with a B.A. in Political Science.

### **RACHEL MILLER**

Rachel Miller is an Associate with Bursor & Fisher, P.A. Rachel focuses her practice on complex civil litigation and class actions.

Rachel is admitted to the State Bar of Florida and is a member of the bar of the United States District Court for the Southern District of Florida.

Rachel received her Juris Doctor from the University of Chicago Law School in 2015. During law school, Rachel participated in the Criminal & Juvenile Justice Clinic and received the 2014 Public Interest Law Society Award for Public Service. Rachel graduated *cum laude* from the University of Florida in 2012 with a B.A. in Political Science.

### **JULIA VENDITTI**

Julia Venditti is an Associate with Bursor & Fisher, P.A. Julia focuses her practice on complex civil litigation and class actions. Julia was a Summer Associate with Bursor & Fisher prior to joining the firm.

Julia is admitted to the State Bar of California and is a member of the bars of the United States District Courts for the Northern and Southern Districts of California.

Julia received her Juris Doctor in 2020 from the University of California, Hastings College of the Law, where she graduated *cum laude* with two CALI Awards for the highest grade in her Evidence and California Community Property classes. During law school, Julia was a member of the UC Hastings Moot Court team and competed at the Evans Constitutional Law Moot Court Competition, where she finished as a national quarterfinalist and received a best brief award. Julia was also inducted into the UC Hastings Honors Society and was awarded Best Brief and an Honorable Mention for Best Oral Argument in her First-Year Moot Court section. In addition, Julia served as a Research Assistant for her Constitutional Law professor, as a Teaching Assistant for Legal Writing & Research, and as a Law Clerk at the San Francisco Public Defender's Office. In 2017, Julia graduated *magna cum laude* from Baruch College/CUNY, Weissman School of Arts and Sciences, with a B.A. in Political Science.

### **SEAN L. LITTERAL**

Sean L. Litteral is an Associate with Bursor & Fisher, P.A. Sean focuses his practice on complex business litigation, consumer class actions, and employment law disputes. He holds degrees from Berea College, the London School of Economics and Political Science, and Berkeley Law.

Sean has represented clients in a variety of matters, including survivors against the Boy Scouts of America for covering up decades of sexual abuse; warehouse workers against Walmart for failing to comply with COVID-19 health and safety guidelines; and drivers against Corinthian International Parking Services for systematically violating California's wage and hour laws.

Sean clerked for the Alaska Supreme Court and served as a fellow for the U.S. House Committee on Education and Labor and the Atlanta City Council. He previously externed for



the Special Litigation Section, Civil Rights Division of the U.S. Department of Justice; the Berkeley Environmental Law Clinic; and the Corporate Sustainability Program at the Pontificia Universidad Católica de Chile.

He has published in the UC Davis Environmental Law & Policy Journal, the Harvard Latinx Law Review, and the Stanford Law and Policy Review on a broad scope of matters, including corporate sustainability, international trade, and national security.

### **JULIAN DIAMOND**

Julian Diamond is a Law Clerk with Bursor & Fisher, P.A. Julian focuses his practice on privacy law and class actions. Julian was a Summer Associate with Bursor & Fisher prior to joining the firm.

Julian received his Juris Doctor from Columbia Law School in 2020, where he was a Harlan Fiske Stone Scholar. During law school, Julian was Articles Editor for the Columbia Journal of Environmental Law. Prior to law school, Julian worked in education. Julian graduated from California State University, Fullerton with a B.A. in History and a single subject social science teaching credential.

### **MATT GIRARDI**

Matt Girardi is an Associate with Bursor & Fisher, P.A. Matt focuses his practice on complex civil litigation and class actions. Matt was a Summer Associate with Bursor & Fisher prior to joining the firm.

Matt received his Juris Doctor from Columbia Law School in 2020, where he was a Harlan Fiske Stone Scholar. During law school, Matt was the Commentary Editor for the Columbia Journal of Tax Law, and worked for fledgling businesses with Columbia's Entrepreneurship and Community Development Clinic. In addition, Matt worked as an Honors Intern in the Division of Enforcement at the U.S. Securities and Exchange Commission. Prior to law school, Matt graduated from Brown University in 2016 with a B.A. in Economics, and worked as a Paralegal Specialist at the U.S. Department of Justice in the Antitrust Division.



DATE	MATTER	ATTY	DESCRIPTION	TIME
2016.03.04	Perez 1	JAL	Intake, retainer, demand letter, and call log (.7).	0.7
2016.03.24	Perez 1	SNW	Email exchange with JAL re case intake & complaint.	0.1
2016.03.25	Perez 1	SNW	Reviewed email from defense counsel re demand letter.	0.1
2016.03.27	Perez 1	SNW	Researched defendant; reviewed client intake notes & call log; drafted complaint.	1.4
2016.03.28	Perez 1	SNW	Drafted complaint.	1.5
2016.03.29	Perez 1	JAL	Reviewed Rash Curtis complaint from SNW.	1
2016.03.29	Perez 1	SNW	Drafted complaint; email to JAL re same.	1.2
2016.03.30	Perez 1	SNW	Reviewed email from JAL re case progression.	0.1
2016.04.11	Perez 1	JAL	Prepared second letter.	0.5
2016.04.14	Perez 1	JAL	Sent complaint for client to review (.2); called and confirmed details via phone (.4).	0.6
2016.04.18	Perez 1	JAL	Finalized and sent second demand letter.	0.5
2016.04.19	Perez 1	SNW	Reviewed second letter & email from JAL re same.	0.1
2016.04.27	Perez 1	JAL	Reviewed letter from defense counsel.	0.5
2016.04.27	Perez 1	SNW	Reviewed email from defense counsel responding to second demand letter.	0.1
2016.04.28	Perez 1	JAL	Responded to letter from defense counsel.	1
2016.04.28	Perez 1	SNW	Reviewed email from JAL to defense counsel requesting documentation.	0.1
2016.05.06	Perez 1	YOK	Discussed with JAL and wrote email to defense counsel re settlement offer.	0.5
2016.06.09	Perez 1	SNW	Reviewed call logs and intake notes for clients in reserve; drafted complaint.	1.8
2016.06.10	Perez 1	SNW	Finalized draft complaint; email to YOK re same; updated case status sheet.	2
2016.06.15	Perez 1	YOK	Finalized complaint, sent draft of complaint to clients, call with clients, emailed defense counsel re potential settlement.	4
2016.06.16	Perez 1	MCG	Prepared CCS and Summons for Rash Curtis & Associates (.5).	0.5
2016.06.16	Perez 1	YOK	Finalized complaint.	0.3
2016.06.17	Perez 1	DLS	Filed complaint - Rash Curtis.	0.8
2016.06.17	Perez 1	MCG	Filed Complaint for Rash Curtis & Associates (.5).	0.5
2016.06.17	Perez 1	YOK	Finalized and filed complaint.	2
2016.06.21	Perez 1	MCG	Filed Declination of Magistrate for Rash Curtis & Associates (.5).	0.5
2016.06.29	Perez 1	MCG	Served Rash Curtis & Associates (.5).	0.5
2016.07.01	Perez 1	YOK	Email exchanges with Debbie re service.	0.2
2016.07.05	Perez 1	MCG	Intakes (.5); Filed Proof of Service for Rash Curtis & Associates (.3).	0.8
2016.08.30	Perez 1	DLS	Filed ADR certifications and stip re ADR mediation.	0.6
2016.08.30	Perez 1	YOK	Filed mediation stipulation, filed ADR certifications for clients, email exchanges with clients re ADR certifications, multiple emails with defense counsel re 26(f) call and mediation stipulation.	2
2016.08.31	Perez 1	YOK	Emails with defense counsel re 26(f) conference, prepared for 26(f) conference, conducted 26(f) call, began drafting 26(f) report.	2

2016.09.14	Perez 1	SNW	Email exchange & video conf with YOK re discovery requests.	0.2
2016.09.14	Perez 1	YOK	Discussion re: case status and discovery with SNW.	0.2
2016.09.18	Perez 1	SNW	Drafted requests for production.	0.8
2016.09.19	Perez 1	SNW	Drafted requests for production.	1
2016.09.19	Perez 1	TAR	Draft 26(f) report.	1.5
2016.09.19	Perez 1	YOK	Responded to email from class member.	0.1
2016.09.20	Perez 1	SNW	Drafted interrogatories; email to YOK re discovery requests.	1.5
2016.09.20	Perez 1	TAR	Draft 26(f) report.	3
2016.09.20	Perez 1	YOK	Reviewed TAR draft 26(f) report, edited discovery requests/interrogatories.	0.5
2016.09.21	Perez 1	DLS	Made edits and served discovery requests.	0.6
2016.09.21	Perez 1	YOK	Finalized and worked with Debbie Schroeder on serving RFPs and ROGs. Made many revisions to 26(f) report and circulated to defense counsel.	1.6
2016.09.23	Perez 1	DLS	Prepared and filed notice of interested parties.	0.9
2016.09.23	Perez 1	YOK	Worked with Debbie on certificate of interested parties.	0.1
2016.09.26	Perez 1	DLS	Filed CMC statement.	0.4
2016.09.26	Perez 1	YOK	Finalized 26(f) report and filed.	0.4
2016.09.27	Perez 1	DLS	Prepared chambers copy of CMC statement.	0.4
2016.09.30	Perez 1	DLS	Fixed formatting and served initial disclosures by email.	0.7
2016.09.30	Perez 1	JLH	Created book for AMP re initial scheduling conference.	2
2016.09.30	Perez 1	TAR	Draft plaintiff's initial disclosures.	1.9
2016.09.30	Perez 1	YOK	Worked with TAR and DLS on initial disclosures.	1
2016.09.30	Perez 1	AMP	Gathered materials (0.9); Reviewed case file (0.9); email to YOK re initial disclosures (0.1); call to DS re same (0.1).	2
2016.10.03	Perez 1	AMP	Studied case to prepare for initial scheduling conference, appeared at initial scheduling conference, and updated YOK re same.	8.3
2016.10.07	Perez 1	AMP	Reviewed ECF (0.2); emailed opposing counsel with YOK (0.1) .	0.3
2016.10.10	Perez 1	YOK	Emailed defense counsel re meet and confer re discovery order.	0.1
2016.10.12	Perez 1	YOK	Discussed case strategy and case management hearing with AMP, email exchanges re meet and confer call with defense counsel.	0.5
2016.10.12	Perez 1	AMP	Reviewed draft meet and confer letter and discussed with YOK.	0.3
2016.10.13	Perez 1	AMP	Prepped for call, discussed with YOK, and call with opposing counsel re discovery plan.	1.1
2016.10.13	Perez 1	YOK	Participated on meet and confer call re discovery issues with defendant and AMP, prepared for call re same.	1.1
2016.10.14	Perez 1	YOK	edited joint statement and email exchanges with defense counsel re same.	0.8
2016.10.27	Perez 1	YOK	Participated in meet and confer call re discovery, reviewed discovery, prepared for call re same.	1
2016.11.02	Perez 1	YOK	Reviewed procedures for filing motion to compel, reviewed production.	2.8

2016.11.03	Perez 1	YOK	Emailed defense counsel re production issues.	0.1
2016.11.09	Perez 1	YOK	Emailed Defendant re late production.	0.2
2016.11.15	Perez 1	YOK	Emailed defense counsel re discovery issues.	0.2
2016.11.29	Perez 1	YOK	Emailed defendant re late production.	0.2
2016.12.02	Perez 1	YOK	Emailed defense counsel re meet and confer re discovery issues.	0.3
2016.12.05	Perez 1	YOK	Reviewed defendant's production.	0.3
2016.12.19	Perez 1	YOK	Emailed defense counsel re settlement.	0.1
2016.12.20	Perez 1	YOK	Email exchange with defense counsel re settlement.	0.1
2017.01.03	Perez 1	YOK	Emailed defense counsel re settlement	0.1
2017.01.13	Perez 1	YOK	Emailed defense counsel re settlement and called clients.	0.8
2017.01.24	Perez 1	YOK	Emailed defense counsel re settlement.	0.1
2017.01.26	Perez 1	YOK	Reviewed settlement agreement.	0.2
2017.01.27	Perez 1	LTF	Discussed communication from Steve Kizer with Yeremey Krivoshey.	0.4
2017.01.27	Perez 1	YOK	Call with Steve Kizer, call with LTF re Steve Kizer and strategy.	0.9
2017.01.31	Perez 1	LTF	Discussed settlement and Steve Kizer meeting with Yeremey Krivoshey.	0.2
2017.01.31	Perez 1	YOK	Multiple email exchanges with defense counsel re settlement, discussions with AMP and LTF re settlement, emailed Mr. Kizer to set up meeting.	0.6
2017.02.02	Perez 1	YOK	Emailed Plaintiffs.	0.4
2017.02.03	Perez 1	JDS	Meet with Steven Kizer.	2.3
2017.02.03	Perez 1	LTF	Discussed Kizer meeting with Yeremey Krivoshey and Joel Smith and met with Steve Kizer.	2.7
2017.02.03	Perez 1	YOK	Prepared for Kizer meeting, discussion re Kizer meeting with LTF and JDS, and meeting with Kizer.	3.3
2017.02.07	Perez 1	LTF	Call with Chris Marlborough to discuss Kizer allegations and discussed same with Yeremey Krivoshey.	0.3
2017.02.07	Perez 1	YOK	Discussion re Kizer issues with LTF, began drafting subpoena documents and new discovery requests.	3.2
2017.02.08	Perez 1	YOK	Finalized subpoena, discussions with Debbie Schroeder re same, finalized and worked with Debbie Schroeder on serving discovery requests, drafted protective order and sent email to defense counsel re same.	4
2017.02.09	Perez 1	DLS	Finalized notice of subpoena and served by email.	0.9
2017.02.10	Perez 1	YOK	Emailed defense counsel re class cert extension.	0.2
2017.02.12	Perez 1	LTF	Discussed case status with Joel Smith and exchanged emails with Yeremey Krivoshey regarding same.	0.2
2017.02.12	Perez 1	YOK	Emails with defense counsel re class cert stipulation and Kizer issues, emailed LTF re same.	0.3
2017.02.13	Perez 1	LTF	Discussed extension of time and discovery issues with Yeremey Krivoshey.	0.2
2017.02.13	Perez 1	YOK	Discussions re discovery with LTF	0.2

2017.02.17	Perez 1	YOK	Drafted and sent class cert stipulation to defense counsel.	2.7
2017.02.22	Perez 1	YOK	Emailed defense counsel re class cert stipulation.	0.1
2017.02.23	Perez 1	YOK	Emailed defense counsel re class cert stipulation, finalized and filed protective order.	0.6
2017.02.24	Perez 1	YOK	Call with Kizer re subpoena service, emailed defense counsel re purported settlement, drafted amended subpoena and notice of subpoena and arranged for service with D. Schroeder.	1.5
2017.02.27	Perez 1	YOK	Emailed Kizer and defense counsel re subpoena due date.	0.2
2017.03.01	Perez 1	YOK	Drafted and filed motion to extend class certification briefing, proposed order, and Krivoshey declaration.	7.1
2017.03.02	Perez 1	JLH	Sent chambers copy to YGR.	0.5
2017.03.03	Perez 1	YOK	Call with Mr. Kizer's attorney re protective order and subpoena, emailed same to him.	0.2
2017.03.06	Perez 1	YOK	Reviewed D's response to motion to extend class certification briefing.	0.3
2017.03.08	Perez 1	YOK	Reviewed discovery production.	2.5
2017.03.10	Perez 1	YOK	Emails with D re Kizer production.	0.3
2017.03.14	Perez 1	YOK	Reviewed order re motion to extend class cert briefing.	0.2
2017.03.16	Perez 1	YOK	Analyzed discovery and strategized re next steps.	2.5
2017.03.17	Perez 1	YOK	Began working on meet and confer letter and reviewed defendant's production re same.	3.3
2017.03.20	Perez 1	JLH	Rash Curtis second set of discovery.	1
2017.03.20	Perez 1	YOK	Worked on opposition to motion to enforce settlement agreement.	7
2017.03.21	Perez 1	YOK	Continued working on opposition to motion to enforce settlement.	6.8
2017.03.22	Perez 1	YOK	Continued working on opposition to motion to enforce settlement and began working on Krivoshey declaration in support.	7.5
2017.03.23	Perez 1	LTF	Discussed oppositon to motion to enforce settlement with Yeremey Krivoshey and Joel Smith.	0.3
2017.03.23	Perez 1	YOK	Discussed opposition to motion to enforce settlement with LTF and JDS and continued working on opposition brief and associated declaration.	8.5
2017.03.24	Perez 1	JDS	Review and edit opposition to motion to enforce settlement; meet with LTF re same.	0.8
2017.03.24	Perez 1	JLH	Overnight chamber copies sent to YGR.	0.7
2017.03.24	Perez 1	LTF	Reviewed and revised opposition to motion to enforce settlement and discussed same with Yeremey Krivoshey, Debbie Schroeder, and Joel Smith.	2.7
2017.03.24	Perez 1	YOK	Reviewed redlines to opposition to motion to enforce settlement, call with LTF re same.	1
2017.03.29	Perez 1	JDS	Meet with LTF and YOK re status of case.	0.4
2017.03.29	Perez 1	LTF	Discussed case strategy with Joel Smith and Yeremey Krivoshey.	0.4
2017.03.29	Perez 1	YOK	Discussed case strategy with JDS and LTF (.4), finished drafting and emailed meet and confer letter to defense counsel (5.2), research re subpoena for deposition and emailed Mr. Kizer's attorneys re same (.4).	6
2017.03.30	Perez 1	YOK	Emailed counsel for Mr. Kizer re subpoena.	0.1
2017.03.31	Perez 1	LTF	Discussed case strategy with Joel Smith and Yeremey Krivoshey.	0.3

2017.03.31	Perez 1	YOK	Emailed Kizer's lawyers re subpoena timing, and discussed next steps with LTF.	0.3
2017.04.04	Perez 1	YOK	Drafted subpoena to testify for Mr. Kizer and drafted notice of subpoena (1.7), assisted Debbie Schroeder with serving notice of subpoena on Defendant (.2), served subpoena on Mr. Kizer's attorney (.1).	2
2017.04.05	Perez 1	YOK	Reviewed documents for Kizer deposition.	1.5
2017.04.06	Perez 1	YOK	Email exchanges with defense counsel re meet and confer letter.	0.2
2017.04.07	Perez 1	JLH	Updated and filed Notice of Withdrawal (AMP) with Debbie.	0.7
2017.04.11	Perez 1	YOK	Emailed defendant re meet and confer, drafted plaintiffs' portion of joint statement and sent to defense counsel (1.5), discussed case strategy with JDS (.2), prepped for Kizer deposition (3.0).	4.7
2017.04.12	Perez 1	JLH	Printed docs for Kizer deposition.	1
2017.04.12	Perez 1	YOK	Prepped for Kizer deposition.	10.8
2017.04.13	Perez 1	DLS	Set up for Kizer deposition.	0.9
2017.04.13	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding deadline for response to discovery dispute letter.	0.1
2017.04.13	Perez 1	YOK	Prepared for deposition and took Mr. Kizer's deposition (7.8), discussion with JDS re same (.2), email exchange with LTF re meet and confer (.1), emailed defense counsel re joint statement (.1).	8.2
2017.04.14	Perez 1	YOK	Email exchanges with defense counsel re motion to enforce settlement hearing date and reviewed stipulation re same (.3).	0.3
2017.04.17	Perez 1	YOK	Finalized and filed Joint Statement, email exchanges with defense counsel re same, drafted and filed Krivoshey declaration and assembled exhibits in support of Joint Statement.	3.2
2017.04.18	Perez 1	YOK	Reviewed order re motion to enforce settlement and thought about case strategy.	0.3
2017.04.20	Perez 1	YOK	Call with Colin Weir.	0.3
2017.04.25	Perez 1	LTF	Email exchange with Paul Arons regarding Mark Ellis and discussed same with Yeremey Krivoshey.	0.1
2017.04.25	Perez 1	YOK	Discussed Paul Arons with LTF.	0.1
2017.04.26	Perez 1	YOK	Analyzed Kizer deposition transcript and strategized for class cert.	2.8
2017.04.27	Perez 1	JLH	Discovery hearing book for YOK.	1
2017.04.27	Perez 1	LTF	Reviewed emails regarding Kizer deposition and discussed same with Yeremey Krivoshey.	0.2
2017.04.27	Perez 1	YOK	Reviewed Defendant's RFPs and discussed same with Debbie Schroeder (.3). Reviewed Notice of Kizer subpoena (.1), researched case law on issue of deposing same witness twice and motion to quash (1.4), emailed Kizer's attorney re subpoena (.1), multiple email exchanges with defense counsel re Kizer deposition (.3), prepared for discovery hearing and discussed hearing prep with JLH (1.0).	3.2
2017.04.30	Perez 1	YOK	Prepped for hearing on discovery.	2.7
2017.05.01	Perez 1	LTF	Discussed discovery hearing and class cert motion with Yeremey Krivoshey.	0.4

2017.05.01	Perez 1	YOK	Prepped for hearing, attended hearing re discovery, participated in meet and confer with defendant re discovery issues, drafted and circulated meet and confer letter, discussed hearing and class cert with LTF.	6.5
2017.05.02	Perez 1	YOK	Email exchanges with Kizer's attorney re subpoena.	0.2
2017.05.03	Perez 1	YOK	Call with Randy Snyder re class cert report, prepped for call, call with Mr. Kizer's attorney re D's request for new deposition.	1
2017.05.05	Perez 1	YOK	Email exchange with defense counsel re search terms and meet and confer letter.	0.1
2017.05.09	Perez 1	YOK	Prepared for and participated on meet and confer call with defendant re discovery issues, reviewed letter from Kizer's attorney re deposition.	1.1
2017.05.15	Perez 1	YOK	Emailed defense counsel re discovery issues.	0.1
2017.05.16	Perez 1	YOK	Emailed defense counsel re discovery issues and call with defense counsel to meet and confer re same.	0.5
2017.05.19	Perez 1	YOK	Call with Colin Weir re class cert, multiple email exchanges with defense counsel re discovery issues, call with Randy Snyder re class cert.	0.5
2017.05.22	Perez 1	JDS	Meet with LTF and YOK re class certification and case strategy.	0.3
2017.05.22	Perez 1	LTF	Discussed class certification motion and settlement with Yeremey Krivoshey and Joel Smith.	0.3
2017.05.22	Perez 1	TAR	Begin drafting letter motion to compel.	1
2017.05.22	Perez 1	YOK	Discussed class cert strategy and settlement with LTF and JDS, worked on class cert motion, discussed motion to compel with TAR, call with defense counsel re search of custodians and other production issues.	5.8
2017.05.23	Perez 1	JDS	Analyze draft declaration/report of Snyder; meet with YOK re same.	1.5
2017.05.23	Perez 1	TAR	Draft RFPs and ROGs.	1.3
2017.05.23	Perez 1	YOK	Email exchanges with defense counsel re custodians and search terms and insurance policy, worked on class certification, reviewed Snyder declaration and discussed same with JDS.	9
2017.05.24	Perez 1	DLS	Prepared motion for class cert template.	1
2017.05.24	Perez 1	DLS	Made edits and formatting corrections to discovery requests; finalized and served by email and mail.	0.7
2017.05.24	Perez 1	JDS	Teleconference with R. Snyder re class certification; meet with YOK re same.	0.7
2017.05.24	Perez 1	LTF	Discussed class representative McMillon with Yeremey Krivoshey and Joel Smith.	0.2
2017.05.24	Perez 1	TAR	Draft RFPs and ROGs.	2.9
2017.05.24	Perez 1	YOK	Reviewed draft interrogatories and assisted with service, call with Randy Snyder w/ JDS, continued working on class cert motion.	8.7
2017.05.25	Perez 1	DLS	Spoke to YOK and TAR re class cert filing and sealing motion.	0.4
2017.05.25	Perez 1	DLS	Emailed sample docs for N.D. Cal. sealing motions to TAR.	0.2
2017.05.25	Perez 1	JDS	Assist with class cert brief.	1.3
2017.05.25	Perez 1	YOK	Continued working on class cert motion.	8.9
2017.05.26	Perez 1	JDS	Draft class certification brief; edit supporting documents; meet with YOK re same.	6.5



2017.05.26	Perez 1	TAR	Discuss subpoenas w/ YOK (.2) Draft Metro PCS subpoena (1) Draft Accurint subpoenas (1.5) Draft notice of subpoenas (1).	3.7
2017.05.26	Perez 1	TAR	Prepare sealing documents for class cert motion.	0.8
2017.05.26	Perez 1	YOK	Continued working on class cert motion, discussions with JS re same, reviewed draft 23(b)(2) insert, reviewed Snyder report.	8.2
2017.05.28	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding status of class cert motion.	0.1
2017.05.28	Perez 1	YOK	Email exchange with LTF re class cert status.	0.1
2017.05.29	Perez 1	JDS	Edit supporting declaration; contact Mr. Snyder.	0.8
2017.05.29	Perez 1	LTF	Reviewed draft of class cert motion and exchanged emails with Joel Smith and Yeremey Krivoshey.	0.5
2017.05.29	Perez 1	YOK	Worked on class cert motion, email exchange with defendant re class cert briefing schedule.	9
2017.05.30	Perez 1	DLS	Email exchange with Veritext for location for production of docs.	0.4
2017.05.30	Perez 1	DLS	Prepare proof of service for subpoenas and confidential docs.	0.5
2017.05.30	Perez 1	DLS	Prepared tables for class cert motion; made edits and corrected formatting.	1.2
2017.05.30	Perez 1	DLS	Assisted with finalizing all documents; finalized and filed administrative motion to seal and motion for class certification; emailed proposed orders to Judge.	6.7
2017.05.30	Perez 1	JDS	Edit, proofread class cert brief; meet w/ YOK re same.	1.3
2017.05.30	Perez 1	JLH	Prepare filed documents for mail service to Defendant.	2
2017.05.30	Perez 1	LTF	Reviewed and revised draft of class cert motion and discussed motion and case status with Yeremey Krivoshey, Joel Smith and Debbie Schroeder.	1.5
2017.05.30	Perez 1	TAR	Edit subpoenas; revise place of production and coordinate w/ Debbie and Veritext.	2.6
2017.05.30	Perez 1	TAR	Draft and file sealing motion re class cert.	6.5
2017.05.30	Perez 1	YOK	Finalized and filed all class cert docs, worked with TAR on sealing motion, reviewed subpoena docs and assisted with serving notice, call with Snyder re class cert declaration, call with Colin Weir re class cert declaration.	9.2
2017.05.31	Perez 1	DLS	Emailed subpoenas to First Legal for service.	0.1
2017.05.31	Perez 1	DLS	Assisted Jared with preparing chamber copies to Judge YGR.	0.9
2017.05.31	Perez 1	DLS	Set up docket tracking for YOK.	0.4
2017.05.31	Perez 1	JLH	Rash Curtis Chamber Copies (1.5).	1.5
2017.05.31	Perez 1	JLH	Proof of Service (.2) Mail Flash Drive (.3).	0.5
2017.05.31	Perez 1	LTF	Discussed KBR and insurance issue with Yeremey Krivoshey and Joel Smith.	0.4
2017.05.31	Perez 1	TAR	Organize subpoenas for service.	0.5
2017.05.31	Perez 1	YOK	emailed clients re ADR certification and filed ADR certification.	1
2017.05.31	Perez 1	YOK	Reviewed insurance policy, discussed KBR and Rash Curtis connection with LTF and JDS, research re KBR connection.	1.5
2017.06.01	Perez 1	JLH	Put Rash Curtis Production on Box.	2
2017.06.01	Perez 1	TAR	Discuss Accurint Subpoena with LexisNexis Counsel.	0.4

2017.06.01	Perez 1	YOK	Email exchanges with Thomas Reyda re LexisNexis/Accurint subpoena.	0.2
2017.06.05	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding settlement.	0.1
2017.06.05	Perez 1	YOK	Call with LexisNexis representative re subpoena production, discussed same with LTF, email exchange with LTF re settlement, research re KBR entity and insurance policy, correspondence with defendant re Kizer subpoena production.	1.6
2017.06.09	Perez 1	JDS	Email opposing counsel.	0.1
2017.06.12	Perez 1	JDS	Prepare for and attend teleconference with opposing counsel.	0.4
2017.06.12	Perez 1	LTF	Call with defendant's counsel, discussed call with Joel Smith and Yeremey Krivoshey and sent letter to defendant's counsel regarding mediation.	0.6
2017.06.12	Perez 1	YOK	Call with defendant's counsel re settlement, discussions re same with LTF and JDS, drafted letter to defense counsel re same.	0.6
2017.06.20	Perez 1	JDS	Teleconference with opposing counsel; meet with LTF re status of case.	0.4
2017.06.20	Perez 1	LTF	Discussed mediation with Yeremey Krivoshey and Joel Smith.	0.3
2017.06.20	Perez 1	YOK	Call with JDS and defense counsel re mediation, class cert deadlines, and P depositions. Discussed same with LTF. Drafted email to defense counsel re mediation. Emailed defendant re discovery issues.	0.9
2017.06.21	Perez 1	JDS	Review email from opposing counsel and meet with YOK re status of case.	0.2
2017.06.22	Perez 1	LTF	Discussed mediation scheduling with Joel Smith and Yeremey Krivoshey and reviewed email regarding same.	0.1
2017.06.22	Perez 1	YOK	Discussed mediation with LTF and JDS, reviewed email from defense counsel re same.	0.1
2017.06.23	Perez 1	LTF	Discussed plaintiffs' depositions with Yeremey Krivoshey.	0.2
2017.06.23	Perez 1	YOK	Call with McMillion, 2 calls with Adekoya, left voicemail for Perez, discussed depositions and class cert reply with LTF and JDS, emailed defense counsel re depositions.	1
2017.06.26	Perez 1	LTF	Reviewed emails regarding discovery issues and discussed depositions with Yeremey Krivoshey.	0.2
2017.06.26	Perez 1	YOK	Emailed defense counsel re discovery issues and mediation, discussed depositions with LTF, 2 calls with Perez.	0.9
2017.06.27	Perez 1	YOK	Email exchanges with defense counsel re discovery issues.	0.2
2017.06.28	Perez 1	JDS	Teleconference with opposing counsel; meet with LTF re status of case.	0.3
2017.06.28	Perez 1	LTF	Discussed mediation and class cert opposition with defendant's counsel, Joel Smith and Yeremey Krivoshey (.4); reviewed and revised stipulation and proposed order and exchanged emails with defendant's counsel regarding same (.2).	0.6
2017.06.28	Perez 1	YOK	Lengthy email exchanges with defendant re discovery issues, discussed class cert scheduling with LTF, reviewed stipulation re defendant's extension of time to oppose class cert, reviewed emails from mediator.	0.7
2017.06.29	Perez 1	LTF	Call with defendant's counsel and exchanged emails with defendant's counsel and Yeremey Krivoshey regarding same (.3).	0.3
2017.06.29	Perez 1	YOK	Emailed LTF re class cert opposition.	0.1
2017.06.30	Perez 1	JDS	Review and sign mediator agreement.	0.4

2017.07.05	Perez 1	JDS	Meet with YOK re status of case.	0.2
2017.07.05	Perez 1	LTF	Reviewed opposition to class cert and discussed with Yeremey Krivoshey and Joel Smith.	0.5
2017.07.05	Perez 1	YOK	Reviewed class cert opposition and discussed same with LTF and JDS.	0.5
2017.07.06	Perez 1	LTF	Discussed plaintiffs' depositions with Yeremey Krivoshey, Joel Smith and Thomas Reyda.	0.5
2017.07.06	Perez 1	YOK	Discussed plaintiffs' deposition with LTF, JDS, and TAR.	0.5
2017.07.07	Perez 1	DLS	Made car reservation for plaintiff deposition - McMillion	0.4
2017.07.07	Perez 1	JDS	Meet with LTF and YOK re status of case.	0.2
2017.07.07	Perez 1	JLH	Put Rash Curtis docs on box.	0.5
2017.07.07	Perez 1	LTF	Discussed plaintiffs' depositions and discussed them with Joel Smith and Yeremey Krivoshey.	0.3
2017.07.07	Perez 1	YOK	Discussed plaintiffs' depositions with LTF and JDS, emailed Defendant re lack of production in response to RFP 23, emailed Defendant re deposition scheduling, assembled documents for McMillion prep and discussed same with JDS.	0.8
2017.07.09	Perez 1	LTF	Reviewed depo prep outline and exchanged emails with Joel Smith regarding same.	0.3
2017.07.10	Perez 1	DLS	Made car reservation for plaintiff deposition - Adekoya.	0.5
2017.07.10	Perez 1	JDS	Prepare for and attend meeting with McMillion to prepare for deposition	3.3
2017.07.10	Perez 1	LTF	Prepared for Adekoya deposition and discussed it with Thomas Reyda.	0.8
2017.07.10	Perez 1	YOK	Participated for part of call with McMillion and JDS re deposition, emailed McMillion, discussed same with JDS. Email exchange with LTF re mediation. Emailed exchanges with defendant re search term production.	0.8
2017.07.11	Perez 1	DLS	Set up for Adekoya deposition.	0.8
2017.07.11	Perez 1	JDS	Prepare for and defend McMillion deposition.	4.2
2017.07.11	Perez 1	JDS	Assist with preparation of second plaintiff's deposition.	2.5
2017.07.11	Perez 1	JDS	Meet with LTF and YOK re status of case.	0.6
2017.07.11	Perez 1	JLH	Prepped for depositions.	2.5
2017.07.11	Perez 1	LTF	Prepared for Adekoya deposition, prepared Adekoya for her deposition and defended Adekoya deposition (7.5); meeting with Joel Smith, Yeremey Krivoshey and Thomas Reyda following Adekoya deposition and discussed Perez deposition and settlement (.8); discussed strategy with Mr. Krivoshey (.2).	8.5
2017.07.11	Perez 1	TAR	Attend prep of Jessica Adekoya (3.5) and deposition (2).	5.4
2017.07.11	Perez 1	YOK	Email exchanges with defense counsel re search term production, met with McMillion and Adekoya prior to and after their depositions, discussed depositions with LTF, JDS, and TAR. Email exchange with Tiffany Cheung re LexisNexis/Accurint subpoena responses.	1.4
2017.07.12	Perez 1	LTF	Discussed Perez deposition with Yeremey Krivoshey.	0.1

2017.07.12	Perez 1	YOK	Texts with Adekoya, discussed Perez depo with LTF, traveled from SF to Sacramento for Perez deposition, met with Perez to prep for deposition, traveled back to hotel following prep. Email exchanges with defendant re search term production.	6.6
2017.07.13	Perez 1	LTF	Discussed Perez deposition with Yeremey Krivoshey and Joel Smith.	0.3
2017.07.13	Perez 1	YOK	Met with Perez prior to deposition, defended deposition, lunch meeting with Perez following deposition to debrief, traveled back to SF following deposition. Emailed defendant re search term production.	7.5
2017.07.14	Perez 1	YOK	Email exchange with defendant re search term production.	0.1
2017.07.15	Perez 1	LTF	Email exchange with Yeremey Krivoshey and defendant's counsel regarding defendant's request for sur-reply and settlement.	0.3
2017.07.15	Perez 1	YOK	Email exchange with LTF re defendant's request for a sur-reply and settlement.	0.2
2017.07.17	Perez 1	LTF	Discussed mediation with Joel Smith and Yeremey Krivoshey (.3); discussed discovery issues with Mr. Krivoshey and reviewed emails regarding same (.2).	0.5
2017.07.17	Perez 1	YOK	Call with defense counsel re search term production, email exchange re same, discussed same with LTF. Discussed mediation with LTF and JDS.	0.7
2017.07.17	Perez 1	YOK	Call with Tiffany Cheung re LexisNexis subpoena production and emailed her re same.	0.4
2017.07.18	Perez 1	YOK	Drafted Plaintiffs' portion of Joint Statement re Discovery Dispute and emailed copy to Defendant (3.3). Began research re reply ISO class certification (3.6).	6.9
2017.07.19	Perez 1	YOK	Continued working on class cert reply.	5.7
2017.07.20	Perez 1	YOK	Continued working on class cert reply.	5.6
2017.07.21	Perez 1	YOK	Continued working on class cert reply.	6.2
2017.07.22	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding discovery issue and reviewed emails regarding same.	0.4
2017.07.22	Perez 1	YOK	Reviewed defendant's portion of the joint statement, which was more than double the limit permitted by local rules, extensive email correspondence with defense counsel re same and with LTF.	0.8
2017.07.24	Perez 1	LTF	Discussed discovery issues and settlement with Yeremey Krivoshey and participated in call with defendant's counsel.	0.4
2017.07.24	Perez 1	YOK	Call with defense counsel re discovery joint statement and discussed same with LTF.	0.4
2017.07.24	Perez 1	YOK	Emailed defendant re class cert hearing date and continued working on class cert reply.	8.4
2017.07.25	Perez 1	YOK	Email correspondence with defense counsel re joint statement concening discovery, reviewed defendant's new section, revised and finalized plaintiffs' portion, drafted Krivoshey declaration and assembled exhibits, assisted with filing joint statement.	1.6
2017.07.25	Perez 1	YOK	Continued working on class cert reply.	7
2017.07.26	Perez 1	YOK	Continued working on class cert reply.	8.6
2017.07.27	Perez 1	JDS	Proofread and edited reply in support of class certification; meet with LTF and YOK re same.	2.5
2017.07.27	Perez 1	YOK	Worked on class cert reply and sealing motion.	8.3

2017.07.28	Perez 1	JDS	Proofread and edited revised reply in support of class certification; meet with YOK re same	2
2017.07.28	Perez 1	YOK	Finalized class cert reply, finalized redacted and unredacted versions, finalized sealing motion, Krivoshey declaration, and protective order, assisted with filing same.	8.2
2017.07.31	Perez 1	YOK	Reviewed transcripts from depositions.	0.7
2017.08.01	Perez 1	LTF	Call with defendant's counsel regarding hearing on discovery motion, discussed same with Yeremey Krivoshey and reviewed and approved stipulation moving hearing to 8/17.	0.3
2017.08.01	Perez 1	YOK	Discussed scheduling re discovery motion with LTF, reviewed proposed stipulation re same.	0.3
2017.08.03	Perez 1	YOK	Worked on mediation brief.	1.5
2017.08.07	Perez 1	YOK	Call with LexisNexis representative re subpoena production, worked on mediation brief, research re T-Mobile subpoena enforcement.	4
2017.08.08	Perez 1	YOK	Worked on mediation brief.	4.5
2017.08.09	Perez 1	DLS	Finalized and served mediation statement.	0.4
2017.08.09	Perez 1	YOK	Finished mediation brief, assembled exhibits, discussed same with Debbie Schroeder.	5.3
2017.08.09	Perez 1	JLH	Lodestar for Rash Curtis.	1.5
2017.08.10	Perez 1	JLH	Rash Curtis Lodestar.	1.2
2017.08.10	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding lodestar.	0.1
2017.08.10	Perez 1	YOK	Discussed lodestar with Debbie Schroeder and Jared Hazlett, email exchange with LTF re same, discussed T-Mobile subpoena with JDS, drafted scheduling stipulation and email exchange with defendant re same.	2.6
2017.08.11	Perez 1	DLS	Finalized and filed stip and prop order; emailed prop order to judge.	0.5
2017.08.11	Perez 1	YOK	Emailed T-Mobile rep re subpoena, finalized and filed scheduling stipulation.	0.7
2017.08.14	Perez 1	YOK	Reviewed order re further class cert submission.	0.1
2017.08.15	Perez 1	JDS	Met with LTF and YOK re mediation strategy.	0.8
2017.08.15	Perez 1	JLH	Books for YOK and LTF for Rash Curtis Mediation.	2.3
2017.08.15	Perez 1	JLH	Print one copy of Defendant's Exhibits.	0.3
2017.08.15	Perez 1	LTF	Discussed mediation and scheduling issues with Yeremey Krivoshey and Joel Smith (.8); prepared for mediation (.5).	1.3
2017.08.15	Perez 1	YOK	Prepared for mediation and discussed same with LTF and JDS (1.3), prepared for discovery hearing (1.0).	2.3
2017.08.16	Perez 1	LTF	Traveled to S.F. for mediation, attended mediation and returned to Walnut Creek following mediation (6.4); discussed mediation with Joel Smith (.2); reviewed order from court regarding class certification motion (.1).	6.7
2017.08.16	Perez 1	YOK	Prepared for and attended mediation with LTF, correspondence with court clerk re waiver of oral argument.	6
2017.08.17	Perez 1	LTF	Discussed discovery hearing and scheduling issues with Yeremey Krivoshey.	0.3
2017.08.17	Perez 1	YOK	Prepared for and attended discovery hearing, traveled to Walnut Creek following hearing, discussed same with LTF and JDS, emailed defendant re scheduling issues.	5.5

2017.08.18	Perez 1	YOK	Drafted statement re class certification per the Court's order, emailed defendant re sealing issue.	0.3
2017.08.21	Perez 1	DLS	Filed proposed order and emailed to Judge.	0.4
2017.08.21	Perez 1	LTF	Discussed sealing issue with Yeremey Krivoshey.	0.1
2017.08.21	Perez 1	TAR	Drafted proposed sealing order and filed.	2.5
2017.08.21	Perez 1	YOK	Discussed sealing issue with LTF.	0.1
2017.08.22	Perez 1	LTF	Discussed scheduling issue with Yeremey Krivoshey.	0.3
2017.08.22	Perez 1	YOK	Research potential ex parte motion re schedule adjustment and discussed scheduling with LTF, emailed defendant re same.	4
2017.08.23	Perez 1	LTF	Discussed ex parte regarding sur-reply, expert disclosures and motion to change time with Yeremey Krivoshey.	0.5
2017.08.23	Perez 1	YOK	Reviewed Defendant's ex parte, started working on ex parte opposition, discussed same with LTF, worked on motion to extend pretrial deadlines.	7.5
2017.08.24	Perez 1	DLS	Fixed formatting of motion to extend; finalized and filed; emailed proposed order to Judge.	1
2017.08.24	Perez 1	JDS	Reviewed motion to extend pretrial deadlines.	0.4
2017.08.24	Perez 1	LTF	Reviewed order on ex parte request to file sur-reply and discussed same with Yeremey Krivoshey (.1); reviewed ex parte scheduling motion and discussed it with Mr. Krivoshey and Joel Smith (.7).	0.8
2017.08.24	Perez 1	YOK	Worked on opposition to Defendant's ex parte until the Court issued the order, discussed same with LTF, also discussed expert disclosures and motion to continue pretrial deadlines with LTF, finished drafting and filed motion to extend pretrial deadlines.	8.2
2017.08.25	Perez 1	DLS	Reviewed transcript order; filed.	0.6
2017.08.25	Perez 1	DLS	Made edits to proofs of service.	0.3
2017.08.25	Perez 1	JLH	Prepare Rash Curtis Chambers Copies for YGR.	0.5
2017.08.25	Perez 1	JLH	Prepared transcript order.	1
2017.08.25	Perez 1	YOK	Calls with Colin Weir re expert disclosure, call with Randall Snyder re expert disclosure, reviewed expert disclosures and discussed same with Debbie Schroeder, drafted and served additional requests for production and interrogatories, email exchanges with defense counsel re call logs.	6.8
2017.08.28	Perez 1	DLS	Prepared check for transcript order.	0.3
2017.08.28	Perez 1	YOK	Worked on response to Defendant's surreply, emailed counsel for LexisNexis re subpoena.	3.2
2017.08.29	Perez 1	JLH	Print Rash Curtis document copies for YOK.	0.5
2017.08.29	Perez 1	JLH	Uploaded efiled Rash Curtis Documents on Box.	0.3
2017.08.29	Perez 1	LTF	Reviewed opposition to scheduling motion and discussed it with Yeremey Krivoshey.	0.1
2017.08.29	Perez 1	LTF	Discussed response to sur-reply with Yeremey Krivoshey.	0.2

2017.08.29	Perez 1	YOK	Reviewed Defendant's opposition to motion to continue pretrial deadlines and discussed same with LTF, continued working on response to Defendant's class cert surreply. Call with LexisNexis attorney re subpoena.	7.6
2017.08.30	Perez 1	DLS	Fixed formatting of response to sur-reply.	0.5
2017.08.30	Perez 1	LTF	Reviewed pre-motion letter and discussed it with Yeremey Krivoshey.	0.4
2017.08.30	Perez 1	YOK	Reviewed pre-motion MSJ letter and discussed same with LTF, continued working on sur-reply response.	8.8
2017.08.31	Perez 1	DLS	Prepared draft template for letter.	0.4
2017.08.31	Perez 1	JLH	Scanned in selected pages of depo transcript and saved to box, sent to YOK.	1.2
2017.08.31	Perez 1	LTF	Worked on response to pre-filing conference letter (2.1); reviewed response to sur-reply and discussed it with Yeremey Krivoshey (.6); reviewed emails from defendant's counsel and Mr. Krivoshey regarding depositions and settlement (.1).	2.8
2017.08.31	Perez 1	YOK	Reviewed LTF's draft response to premotion conference letter and discussed same with LTF. Finished response to Defendant's class cert surreply, drafted Krivoshey declaration in support, finalized sealing docs, assisted with filing.	9.3
2017.09.01	Perez 1	JDS	Met with LTF re status of case and deposition scheduling; reviewed email from opposing counsel.	0.4
2017.09.01	Perez 1	JDS	Reviewed and edited pre-motion letter re MSJ and response; met with LTF re same.	0.6
2017.09.01	Perez 1	JLH	Prepare chambers copies of under seal documents.	0.7
2017.09.01	Perez 1	JLH	Prepare chambers copies of B&F Letter.	0.5
2017.09.01	Perez 1	LTF	Worked on finalizing and filing response to pre-conference letter and discussed same with Joel Smith and Yeremey Krivoshey (1.8); exchanged emails with defendant's counsel regarding deposition scheduling and conducted research regarding expert deposition costs and discussed same with Joel Smith (.8).	2.6
2017.09.01	Perez 1	YOK	Email exchange with LTF re deposition scheduling and reviewed emails re same.	0.2
2017.09.05	Perez 1	JDS	Reviewed and analyzed objection to discovery order; met with LTF re same.	0.3
2017.09.05	Perez 1	JDS	Reviewed opposition to sur-reply.	0.3
2017.09.05	Perez 1	LTF	Reviewed motion for relief from order on discovery motion and discussed same with Joel Smith and Debbie Schroeder.	0.4
2017.09.06	Perez 1	JDS	Reviewed transcript from discovery conference.	0.3
2017.09.06	Perez 1	JDS	Reviewed order granting class certification.	0.4
2017.09.06	Perez 1	LTF	Reviewed order granting motion for class certificaion and discussed same with Joel Smith, Scott Bursor, Debbie Schroeder and Yeremey Krivoshey (1.2); email exchange with mediator (.1).	1.3
2017.09.06	Perez 1	SAB	Read order granting class certification.	0.4
2017.09.06	Perez 1	YOK	Reviewed order re class certification.	0.5
2017.09.07	Perez 1	JDS	Reviewed order denying relief from discovery deadlines.	0.2
2017.09.07	Perez 1	TAR	Drafted non-adverserial discovery motion.	3

2017.09.07	Perez 1	YOK	Reviewed orders re motions to seal, motion re discovery dispute, and letters re summary judgment, email exchanges and discussions with LTF and Josh Arisohn re same.	0.8
2017.09.10	Perez 1	LTF	Email exchange with claims administrator.	0.1
2017.09.11	Perez 1	YOK	Emailed TAR re motion to compel, emailed defendant re call log production.	0.2
2017.09.12	Perez 1	JLH	Scan in deposition transcripts and save to Box.	2
2017.09.12	Perez 1	LTF	Discussed case strategy with Yeremey Krivoshey (x3) and call with Doug DeVries to discuss settlement potential.	0.9
2017.09.12	Perez 1	TAR	Drafted non-adverserial discovery motion.	1.5
2017.09.12	Perez 1	YOK	Email exchange with defendant re call logs and meet and confer, call with mediator with LTF, discussed motion to compel re Tmobile with TAR, emailed representative for Lexis re subpoena, strategized re post class certification discovery.	1.3
2017.09.13	Perez 1	DLS	Reviewed rules re filing under seal; prepared documents for filing in response to order.	1
2017.09.13	Perez 1	LTF	Assisted with filing of redacted and unredacted documents in response to Court's sealing order.	0.3
2017.09.13	Perez 1	YOK	Edited redactions per Court's order and filed class certification documents with updated redactions. Emailed client. Discussed T-Mobile motion to compel with TAR and reviewed same. Strategized re new discovery to serve.	3.5
2017.09.14	Perez 1	DLS	Finalized and filed discovery letter brief.	0.9
2017.09.14	Perez 1	YOK	Revised TAR's draft of motion to compel re T-Mobile subpoena, revised Krivoshey declaration, and filed same.	2.5
2017.09.15	Perez 1	LTF	Reviewed clawback agreement and discussed it with Yeremey Krivoshey.	0.3
2017.09.15	Perez 1	YOK	Checked PACER for related cases.	0.5
2017.09.18	Perez 1	JDS	Meet with YOK re status of case.	0.2
2017.09.18	Perez 1	LTF	Email exchange with mediator regarding settlement prospects and email exchange with Yeremey Krivoshey regarding same.	0.2
2017.09.18	Perez 1	YOK	Discussed settlement with LTF. Call with defense counsel re late production. Call with Lexis representative re subpoena.	1
2017.09.19	Perez 1	YOK	Reviewed T-Mobile production.	1
2017.09.20	Perez 1	YOK	Emailed defense counsel re production, began doc review.	6.8
2017.09.21	Perez 1	YOK	Email exchanges with defense counsel re meet and confer, continued doc review.	9.3
2017.09.22	Perez 1	LTF	Discussed case strategy and document production with Yeremey Krivoshey.	0.4
2017.09.22	Perez 1	YOK	Drafted and circulated plaintiffs' portion of joint case management statement, continued doc review and discussed same with LTF, call with defense counsel re deposition scheduling and settlement.	9.4
2017.09.25	Perez 1	DLS	Finalized and filed CMC statement.	0.4
2017.09.25	Perez 1	YOK	Email exchanges with defense counsel re call logs, revised and filed joint case management statement, continued doc review. Messaged client.	9.5
2017.09.26	Perez 1	JLH	Ignacio Perez research.	0.3
2017.09.26	Perez 1	JLH	Prepare chambers copies.	0.5



2017.09.26	Perez 1	LTF	Reviewed email from defendant's counsel regarding depositions and discussed deposition with Colin Weir.	0.3
2017.09.26	Perez 1	YOK	Drove from SF to Sacramento for meeting with Ignacio Perez, drove back to SF following meeting. Email exchange with LTF re Ignacio meeting and deposition scheduling.	7.2
2017.09.27	Perez 1	YOK	Continued doc review, discussed case strategy with LTF. Emailed defendant re call logs issue.	8.5
2017.09.28	Perez 1	LTF	Discussed discovery hearing with Yeremey Krivoshey.	0.2
2017.09.28	Perez 1	YOK	Prepared for and attended discovery hearing, traveled to Walnut Creek following hearing, discussed same with LTF, continued doc review, emailed defendant re deposition scheduling, emailed defendant re settlement.	9.6
2017.09.29	Perez 1	YOK	Continued doc review.	9.6
2017.10.02	Perez 1	JLH	Scanned docs for Rash Curtis.	0.3
2017.10.02	Perez 1	LTF	Discussed CMC with Yeremey Krivoshey.	0.2
2017.10.02	Perez 1	YOK	Reviewed Defendant's discovery responses and emailed LTF re same, continued doc review, prepared for CMC, attended CMC in Oakland and returned to San Francisco following CMC, called LTF re CMC.	7.2
2017.10.03	Perez 1	JDS	Meet with LTF and YOK re status of case.	0.2
2017.10.03	Perez 1	LTF	Discussed case at firm meeting (.1); discussed case with Yeremey Krivoshey and Joel Smith and began planning trial strategy (1.3).	1.4
2017.10.03	Perez 1	YOK	Discussions with LTF and JDS re trial strategy, continued doc review, began drafting meet and confer letter re outstanding discovery issues.	5.9
2017.10.04	Perez 1	DLS	Reviewed, edited and served deposition notices.	0.9
2017.10.04	Perez 1	LTF	Discussed discovery strategy with Yeremey Krivoshey and call with Yeremey Krivoshey and Scott Bursor.	0.7
2017.10.04	Perez 1	SAB	Videoconf. w/ T. Fisher & Y. Krivoshey re trial strategy (.4).	0.4
2017.10.04	Perez 1	YOK	Call with LTF and SAB re trial strategy and multiple discussions with LTF re same, called Randy Snyder twice re discovery and expert report, continued doc review, finished drafting meet and confer letter and emailed defendant re same, drafted 5 deposition notices and discussed same with Debbie Schroeder.	8.3
2017.10.05	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding subpoena to Jessica Adekoya's employer.	0.3
2017.10.05	Perez 1	YOK	Continued doc review. Call with Jessica Adekoya, emailed defendant re subpoena and discussed same with LTF. Researched advanced notice procedure for subpoenas. Emailed defendant re meet and confer letter.	8.5
2017.10.06	Perez 1	LTF	Reviewed emails between Yeremey Krivoshey and defendant's counsel and discussed same with Mr. Krivoshey (.4); discussed subpoena to Jessica Adekoya's employer with Mr. Krivoshey (.2).	0.6
2017.10.06	Perez 1	YOK	Emails with defendant re Adekoya's boss's subpoena, discussed same with LTF.	0.6
2017.10.09	Perez 1	LTF	Discussed discovery dispute letters with Yeremey Krivoshey and reviewed emails regarding same.	0.3

2017.10.09	Perez 1	YOK	Call with Randy Snyder re expert report, continued doc review, worked on 5 discovery statements and emailed defendant re same.	7.9
2017.10.10	Perez 1	DLS	Finalized and filed discovery statements.	1
2017.10.10	Perez 1	LTF	Discussed discovery motions with Yeremey Krivoshey, reviewed emails regarding same and assisted with filing.	0.5
2017.10.10	Perez 1	YOK	Continued doc review. Finalized and filed 5 joint statements. Drafted Krivoshey declaration and reviewed Snyder declaration. Assembled exhibits for declaration. Emailed defendant re joint statements. Discussed discovery joint statement with LTF.	7.3
2017.10.11	Perez 1	DLS	Finalized and sent subpoena out for service and served.	1
2017.10.11	Perez 1	DLS	Scheduled court reporter and videographer for depositions.	0.5
2017.10.11	Perez 1	JLH	Sent chambers copies to FirstLegal for preparation.	0.7
2017.10.11	Perez 1	JLH	Uploaded efiled Rash Curtis documents.	1
2017.10.11	Perez 1	LTF	Discussed deposition schedule with Yeremey Krivoshey and Joel Smith and reviewed emails regarding same.	0.4
2017.10.11	Perez 1	YOK	Drafted subpoena on DAKCS and arranged for service with Debbie Schroeder. Email exchanges with defendant re deposition scheduling. Strategized re discovery hearing. Continued doc review.	8.6
2017.10.12	Perez 1	DLS	Prepared amended notices of depositions and served.	0.9
2017.10.12	Perez 1	JLH	Prepared chambers copies.	0.7
2017.10.12	Perez 1	YOK	Discussed amended deposition notices with Debbie Schroeder, emailed D re same, discussed same with LTF. Continued doc review and began prepping for Nick Keith deposition. Reviewed Defendant's objection to Krivoshey declaration and drafted Plaintiffs' response re same. Call with Snyder re same.	4
2017.10.13	Perez 1	DLS	Scheduled changes to depositions with Veritext.	0.5
2017.10.13	Perez 1	JDS	Met with YOK re status of case.	0.5
2017.10.13	Perez 1	LTF	Discussed depositions and account log MS Excel file with Yeremey Krivoshey and Joel Smith.	0.4
2017.10.13	Perez 1	YOK	Continued doc review and prep for Nick Keith deposition. Discussed newly discovery account files and depositions with LTF and JDS.	8.1
2017.10.15	Perez 1	YOK	Doc review and prep for Nick Keith deposition.	14.4
2017.10.16	Perez 1	DLS	Set up for Keith deposition.	0.9
2017.10.16	Perez 1	JLH	Prep for deposition and clean up after deposition.	2.5
2017.10.16	Perez 1	JLH	Draft table of contents for Rash Curtis discovery hearing book.	1
2017.10.16	Perez 1	LTF	Discussed Nick Keith deposition and discovery hearing with Yeremey Krivoshey and Debbie Schroeder.	0.3
2017.10.16	Perez 1	YOK	Prepared for and deposed Nick Keith. Discussed same with LTF. Calls with Randy Snyder re expert report and call with Colin Weir re same. Reviewed Snyder's and Weir's reports. Prepped for discovery hearing. Email exchange with Tmobile re production.	7.2
2017.10.17	Perez 1	JLH	Assemble Rash Curtis book for YOK for discovery hearing same day.	1

2017.10.17	Perez 1	LTF	Traveled to S.F. for discovery hearing with Yeremey Krivoshey, discussed hearing with Mr. Krivoshey, attended hearing and returned to Walnut Creek following hearing.	3.3
2017.10.17	Perez 1	YOK	Prepared for discovery hearing. Discussed same with LTF. Traveled to San Francisco from Walnut Creek for discovery hearing, argued at hearing, and returned home following hearing.	5.8
2017.10.18	Perez 1	DLS	Scheduled Courtcall for YOK.	0.4
2017.10.18	Perez 1	LTF	Discussed discovery order and upcoming deadlines with Yeremey Krivoshey (.3); call with Jessica Adekoya and prepared for Chambers and Magtibay depositions (.3).	0.6
2017.10.18	Perez 1	YOK	Prepared for Bob Keith deposition. Call with AV re deposition scheduling and discussed same with LTF and Debbie Schroeder. Began prepping for 30(b)(6) deposition. Call with Jessica Adekoya. Emailed defendant re outstanding discovery issues and potential stipulation re expert disclosures. Call with DAKCS representative re deposition and production.	6.7
2017.10.19	Perez 1	DLS	Prepared amended notice of deposition and served.	0.5
2017.10.19	Perez 1	JLH	Organized Rash Curtis documents for 10/20 deposition.	2
2017.10.19	Perez 1	LTF	Traveled to Oakland for Caldwell and Magtibay depositions, attended depositions, took Ms. Caldwell home following her deposition and returned to Walnut Creek and discussed depositions with Yeremey Krivoshey.	8.2
2017.10.19	Perez 1	YOK	Prepared for Correa deposition. Discussed third party depos with LTF. Worked with Debbie Schroeder on amended notice of deposition for Bob Keith. Emailed defendant re TCN deposition. Obtained white pages report for Daniel Reynoso and discussed same with LTF.	9
2017.10.20	Perez 1	DLS	Set up for deposition.	0.6
2017.10.20	Perez 1	JLH	Rash Curtis: deposition prep.	1
2017.10.20	Perez 1	LTF	Prepared for Reynoso deposition and traveled to Sacramento for Reynoso deposition and returned to Walnut Creek afterwards (5.2); discussed Reynoso no-show with Yeremey Krivoshey and Thomas Reyda (.3).	5.5
2017.10.20	Perez 1	YOK	Prepared for and deposed Dan Correa. Discussed Correa deposition with LTF. Continued prep for Bob Keith and Chris Paff depositions.	6.7
2017.10.23	Perez 1	JLH	Print documents for Rash Curtis deposition.	1.7
2017.10.23	Perez 1	YOK	Emailed Defendant re deposition scheduling. Continued preparing for Bob Keith and Chris Paff depositions.	7.8
2017.10.24	Perez 1	DLS	Set up for deposition.	0.6
2017.10.24	Perez 1	LTF	Discussed Bob Keith deposition issues with Yeremey Krivoshey (.4); listened to discovery hearing (.1); discussed potential Perez issues with Yeremey Krivoshey (.5).	1
2017.10.24	Perez 1	YOK	Prepared for and deposed Chris Paff and Bob Keith. Prepared for and participated on telephonic discovery call with Judge Corley. Discussed depositions and case strategy with LTF, JDS, and TAR. Emailed Defendant re confidentiality designations of exhibits introduced at depositions and reviewed protective order re same issue.	5.2
2017.10.26	Perez 1	DLS	Finalized and filed motion to extend pretrial deadlines.	0.9

2017.10.26	Perez 1	LTF	Reviewed motion for extension of time and discussed it with Yeremey Krivoshey.	0.4
2017.10.26	Perez 1	YOK	Drafted and filed motion to extend pretrial deadlines, Krivoshey declaration in support, proposed order in support, discussed same with LTF. Reviewed Defendant's newest production, discussed same with LTF. Emailed Defendant re outstanding discovery issues.	4.6
2017.10.27	Perez 1	JLH	Prepared and sent chamber copies overnight.	0.5
2017.10.27	Perez 1	YOK	Emailed DAKCS representative re production.	0.2
2017.10.30	Perez 1	YOK	Analyzed Defendant's opposition to motion to extend pretrial deadlines.	0.5
2017.10.31	Perez 1	YOK	Emailed defendant re production issue.	0.1
2017.11.02	Perez 1	YOK	Reviewed DAKCS production in response to subpoena. Reviewed court's order re telephonic discovery hearing and discussed the hearing with Debbie Schroeder.	0.9
2017.11.03	Perez 1	DLS	Scheduled courtcall.	0.4
2017.11.05	Perez 1	LTF	Reviewed request to continue discovery hearing and exchanged emails with Yeremey Krivoshey regarding same.	0.2
2017.11.05	Perez 1	YOK	Reviewed Defendant's request to continue discovery hearing and emailed LTF re same.	0.2
2017.11.06	Perez 1	DLS	Scheduled courtcall.	0.4
2017.11.06	Perez 1	LTF	Discussed motion for reconsideration and discovery hearing postponement with Yeremey Krivoshey.	0.2
2017.11.06	Perez 1	YOK	Research re potential motion for reconsideration of appointment of Adekoya as class rep, discussed same with LTF.	1.2
2017.11.07	Perez 1	YOK	Email exchange with Randy Snyder re supplemental report.	0.1
2017.11.09	Perez 1	LTF	Discussed motion for reconsideration and defendant's pre-motion letter with Yeremey Krivoshey.	0.4
2017.11.09	Perez 1	YOK	Doc review, prepared for and participated on court call, discussed motion for reconsideration with LTF and defendant's pre-motion letter.	4.4
2017.11.13	Perez 1	YOK	Doc review. Worked on MSJ response letter.	2.3
2017.11.14	Perez 1	DLS	Filed letter.	0.4
2017.11.14	Perez 1	JLH	Downloaded Rash Curtis documents to box.	1
2017.11.14	Perez 1	JLH	Chamber copies for Rash Curtis.	1
2017.11.14	Perez 1	YOK	Finalized and file pre-motion MSJ letter response. Doc review.	1.9
2017.11.15	Perez 1	DLS	Scheduled Court Call.	0.5
2017.11.16	Perez 1	JLH	Began Table of Exhibits for Rash Curtis.	0.7
2017.11.16	Perez 1	LTF	Discussed motion for reconsideration and joint report with Yeremey Krivoshey.	0.3
2017.11.16	Perez 1	YOK	Drafted Plaintiffs' portion of Joint Statement, just as I was about to send to Defendant, Defendant sent its own version of a Joint Statement. Reviewed and redlined Defendant's draft Joint Statement and email exchanges with Defendant re same. Doc review. Discussed potential motion for reconsideration and joint report with LTF. Emailed defendant re settlement. Emailed Adekoya.	6.9

2017.11.17	Perez 1	DLS	Filed letter.	0.4
2017.11.17	Perez 1	JLH	Filed Transcript order.	1
2017.11.17	Perez 1	LTF	Listened to discovery hearing and discussed next steps with Yeremey Krivoshey (.3); reviewed MSJ order and discussed MSJ schedule with Mr. Krivoshey (.2); reviewed pre-motion letter and discussed it with Yeremey Krivoshey (.2).	0.7
2017.11.17	Perez 1	YOK	Drafted and filed Plaintiffs' MSJ premotion letter and discussed with LTF. Participated on court call and discussed same with LTF. Call with Randy Snyder re supplemental report.	6.8
2017.11.20	Perez 1	JLH	Continued editing Rash Curtis Depo Exhibit spreadsheet.	1
2017.11.20	Perez 1	LTF	Discussed various pre-trial issues with Yeremey Krivoshey including MSJ, Richardson case, motion for reconsideration and notice and listened to conference with Judge Gonzalez Rogers.	2
2017.11.20	Perez 1	YOK	Worked on motion to relate Richardson case. Participated on call with court re MSJ scheduling and emailed defense counsel re same. Multiple discussions with LTF re MSJ, Richardson case, potential motion for reconsideration, and class notice. Emails with defendant re clawback and discovery. Call with defendant to meet and confer re motion to relate case. Emailed counsel for Richardson re motion to relate and had call with Richadson counsel re same.	8.5
2017.11.21	Perez 1	DLS	Filed motion to relate; emailed proposed order to Judge.	1
2017.11.21	Perez 1	JLH	Continued working on Rash Curtis exhibit list.	1
2017.11.21	Perez 1	JLH	Mailed documents to Defendant.	0.5
2017.11.21	Perez 1	JLH	Chambers Copies to YGR.	0.5
2017.11.21	Perez 1	LTF	Reviewed emails regarding administrative motion and reviewed latest draft.	0.2
2017.11.21	Perez 1	YOK	Emailed defendant re motion to relate, edited motion to relate and filed same. Continued doc review.	4.6
2017.11.22	Perez 1	YOK	Doc review.	4
2017.11.28	Perez 1	LTF	Discussed motion to add Richardson as class rep with Yeremey Krivoshey.	0.5
2017.11.28	Perez 1	YOK	Emailed and called Richardson counsel re motion to appoint Richardson as class rep, called Colin Weir re call log analysis, discussion with LTF re motion to appoint richardson, began working on motion to appoint Richardson as class rep. Doc review.	8.1
2017.11.29	Perez 1	LTF	Discussed motion to add Richardson as class rep with Yeremey Krivoshey.	0.1
2017.11.29	Perez 1	YOK	Call Richardson counsel re potential joint prosecution agreement and motion to appoint Richardson as class rep, reviewed draft Richardson declaration, continued working on motion to appoint Richardson, uploaded call log data, began assembling documents for motion for summary judgment.	8.3
2017.11.30	Perez 1	JLH	Worked on Rash Curtis exhibit list.	1
2017.11.30	Perez 1	LTF	Reviewed Richardson JPA and discussed it with Yeremey Krivoshey.	0.3

2017.11.30	Perez 1	YOK	Call with Colin Weir to discuss call log data, call with defense counsel to discuss VIC call log data, drafted joint prosecution agreement re Richardson and discussed same with LTF, continued working on motion to appoint Richardson as class rep and to intervene, continued assembling docs for MSJ.	7.4
2017.12.01	Perez 1	JLH	Completed exhibit list.	2
2017.12.01	Perez 1	YOK	Continued working on motion to appoint Richardson, emailed counsel for Richardson re same.	6.8
2017.12.03	Perez 1	LTF	Reviewed emails regarding document production issue.	0.1
2017.12.04	Perez 1	DLS	Fixed formatting of motion; finalized and filed; emailed proposed order to Judge.	0.9
2017.12.04	Perez 1	LTF	Reviewed motion to add Richardson as class representative and discussed it with Yeremey Krivoshey and Debbie Schroeder.	0.5
2017.12.04	Perez 1	YOK	Revised JPA, finalized and filed motion to appoint Richardson and Krivoshey declaration and proposed order, discussed same with LTF and Debbie Schroeder, emailed defendant re motion to appoint Richardson.	8.1
2017.12.05	Perez 1	YOK	Worked on motion for summary judgment, called Randy Snyder re report re MSJ, 3 calls with Colin Weir re same, discussed expert reports with Yitz Kopel.	9.2
2017.12.08	Perez 1	YOK	Continued working on MSJ, discussed damages and notice issues with Yitz Kopel.	5.4
2017.12.09	Perez 1	YOK	Continued working on MSJ.	2.3
2017.12.10	Perez 1	YOK	Continued working on MSJ.	4
2017.12.11	Perez 1	DLS	Prepared tables, fixed formatting, finalized and filed MSJ docs; emailed proposed order to Judge and emailed separate statement to counsel.	2.5
2017.12.11	Perez 1	JLH	Cont. depo exhibit list revisions/finalization.	1
2017.12.11	Perez 1	LTF	Discussed summary judgment motion with Yeremey Krivoshey and Debbie Schroeder.	0.3
2017.12.11	Perez 1	YOK	Finished drafting and filed motion for summary judgment, separate statement, Krivoshey declaration, and all supporting docs, discussed same with LTF and DLS.	9
2017.12.12	Perez 1	DLS	Finalized and filed notice of errata.	0.7
2017.12.12	Perez 1	DLS	Finalized and filed motion to extend deadline.	0.9
2017.12.12	Perez 1	JLH	Prepare chamber copies.	1.3
2017.12.12	Perez 1	JLH	Continued editing exhibit list.	1.7
2017.12.12	Perez 1	LTF	Discussed notice of errata with Yeremey Krivoshey and Debbie Schroeder.	0.3
2017.12.12	Perez 1	YOK	Drafted and filed notice of errata and discussed same with LTF and Debbie Schroeder. Meet and confer call with defense counsel re confidentiality designations. Drafted and filed motion to extend expert disclosure deadline and supporting docs, and discussed same with LTF and Debbie Schroeder. Worked on MSJ opposition.	8.1
2017.12.13	Perez 1	JLH	Continued editing Rash Curtis depo exhibit list.	0.7
2017.12.13	Perez 1	JLH	Sent Rash Curtis chamber copies to YGR - admin motion to serve expert designations.	1.3
2017.12.13	Perez 1	YOK	Doc review.	3
2017.12.14	Perez 1	JLH	Finished Rash Curtis Exhibit List.	3

2017.12.14	Perez 1	YOK	Continued doc review.	2
2017.12.15	Perez 1	YOK	Emailed defendant re VIC call logs, continued doc review and privilege log review.	2.8
2017.12.18	Perez 1	YOK	Continued doc review and privilege log review, emailed defendant re call logs.	5
2017.12.19	Perez 1	YOK	Worked on reply ISO motion to appoint Richardson, call with Richardson counsel and defense counsel re Richardson discovery and email exchanges re same.	6.5
2017.12.20	Perez 1	YOK	Emailed defense counsel re costs of VIC call log production. Worked on reply ISO Richardson motion.	4.5
2017.12.21	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding expert designation and reviewed letter filed with Court by defendant's counsel today.	0.2
2017.12.21	Perez 1	YOK	Emailed LTF re expert designation, reviewed defendant's filed declaration, continued working on reply ISO motion to appoint Richardson. Emailed defendant re settlement. Reviewed defendant's expert disclosures.	8
2017.12.22	Perez 1	YOK	Continued working on reply ISO motion to appoint Richardson.	7.4
2017.12.23	Perez 1	LTF	Cut DAKCS check, drafted letter to DAKCS and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2017.12.23	Perez 1	YOK	Emailed LTF re DAKCS check.	0.1
2017.12.26	Perez 1	DLS	Fixed formatting, finalized and filed reply.	1
2017.12.26	Perez 1	LTF	Reviewed Richardson reply brief and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2017.12.26	Perez 1	YOK	Finished drafting and filed reply ISO motion to appoint Richardson and all supporting docs.	8.8
2017.12.27	Perez 1	LTF	Reviewed order on Richardson motion and discussed it and upcoming briefing with Yeremey Krivoshey.	0.3
2017.12.27	Perez 1	YOK	Reviewed order on motion to appoint Richardson, discussed same with LTF. Worked on opposition to MSJ.	4.9
2017.12.28	Perez 1	DLS	Emailed documents filed yesterday to FirstLegal for chambers delivery.	0.3
2017.12.28	Perez 1	YOK	Worked on MSJ opposition, emailed counsel for Richardson re Court's order.	6.1
2018.01.02	Perez 1	YOK	Analyzed privilege log and emailed Defendant re same, email correspondence with defendant re VIC call logs and deposition dates for experts, continued working on opposition to Defendant's MSJ.	2.2
2018.01.03	Perez 1	BER	Review order granting class cert.	0.5
2018.01.03	Perez 1	LTF	Discussed scheduling problem with Yeremey Krivoshey (.2); obtained Magtibay and Caldwell transcripts and saved them to Box and sent Magtibay transcript to Yeremey Krivoshey (.3); discussed Weir deposition schedule with Mr. Krivoshey (.1).	0.6
2018.01.03	Perez 1	YOK	Reviewed ECA Trace report produced in Richardson case, discussed scheduling issues with LTF, continued working on MSJ opposition.	8.3
2018.01.04	Perez 1	YOK	Drafted stipulation to continue expert discovery and trial deadlines, call with defense counsel re same and regarding deposition scheduling, call with Mike Greenwald re case status, continued working on opposition to MSJ.	8.2
2018.01.05	Perez 1	JLH	Analysis of TCN and GCN logs re wrong numbers.	3

2018.01.05	Perez 1	YOK	Worked on MSJ opposition, worked with Jared Hazlett on assembling exhibits for Fisher declaration.	8.3
2018.01.07	Perez 1	YOK	Continued working on opposition to MSJ, emailed defendant re stipulation.	7.5
2018.01.08	Perez 1	DLS	Prepared TOC/TOA; fixed formatting and filed opposition to MSJ.	4
2018.01.08	Perez 1	JDS	Reviewed and edited opposition to MSJ; met with YOK re same; organized exhibits for same.	4
2018.01.08	Perez 1	JLH	Continued analysis of TCN and GCN logs.	4
2018.01.08	Perez 1	JLH	Edited YOK's excel spreadsheet for user friendliness.	0.5
2018.01.08	Perez 1	LTF	Discussed MSJ opposition with Yeremey Krivoshey and assisted with filing MSJ opposition.	1.3
2018.01.08	Perez 1	TAR	Edited Summary Judgment Opposition.	1.8
2018.01.08	Perez 1	YOK	Finalized and filed opposition to Defendant's motion for summary judgment, drafted and filed Fisher declaration, drafted and filed proposed order, discussed same with LTF, JDS, TAR, DLS, and JLH. Discussed Snyder invoice with Debbie Schroeder. Redlined stipulation and drafted proposed order re same and emailed same to defense counsel.	10.7
2018.01.09	Perez 1	DLS	Finalized and filed stip and proposed Order.	0.5
2018.01.09	Perez 1	JLH	Rash Curtis Chambers Copies to YGR with attached audio exhibits.	3.5
2018.01.09	Perez 1	JLH	Uploaded efiled Rash Curtis docs on box.	0.5
2018.01.09	Perez 1	LTF	Discussed MSJ reply and related issues with Yeremey Krivoshey.	1.1
2018.01.09	Perez 1	YOK	Emailed defendant re stipulation re pretrial and trial schedule and filed same, lengthy discussion with LTF re MSJ reply and trial issues, began working on MSJ reply.	7.2
2018.01.10	Perez 1	LTF	Reviewed order on schedule and discussed it with Yeremey Krivoshey.	0.2
2018.01.10	Perez 1	YOK	Continued working on reply ISO motion for summary judgment (7.6), reviewed order on stipulation and discussed same with LTF (.2).	7.8
2018.01.11	Perez 1	YOK	Continued working on MSJ reply.	7.4
2018.01.12	Perez 1	JDS	Met with YOK re status of case and MSJ briefing.	0.4
2018.01.12	Perez 1	YOK	Continued working on reply ISO MSJ and discussed same with JDS.	8.8
2018.01.14	Perez 1	LTF	Reviewed motion to stay and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2018.01.14	Perez 1	YOK	Reviewed motion to stay and discussed same with LTF.	0.4
2018.01.15	Perez 1	DLS	Prepared tables, fixed formatting and filed reply.	1.4
2018.01.15	Perez 1	LTF	Discussed case status with Scott Bursor and Yeremey Krivoshey (.4); discussed MSJ reply with Yeremey Krivoshey and Debbie Schroeder (.2).	0.6
2018.01.15	Perez 1	YOK	Finished drafting, finalized, and filed reply ISO motion for summary judgment. Discussions with LTF and DLS re same.	9
2018.01.17	Perez 1	YOK	Worked on opposition to administrative motion to stay.	6.3
2018.01.18	Perez 1	DLS	Finalized and filed opposition.	0.5



2018.01.18	Perez 1	YOK	Finalized and filed opposition to administrative motion to stay, discussed same with Debbie Schroeder.	3.5
2018.01.24	Perez 1	LTF	Discussed MSJ hearing and trial strategy with Yeremey Krivoshey.	0.4
2018.01.24	Perez 1	YOK	Prepped for MSJ hearing and discussed same with LTF. Call with Colin Weir re call log analysis. Research re cell phone scrubbing companies and experts.	4.6
2018.01.25	Perez 1	YOK	Call and email with Contact Center Compliance re cell phone scrubbing, continued prepping for MSJ hearing.	1.5
2018.01.26	Perez 1	YOK	Call with Anya Verkhovskaya re cell phone scrub, continued preparing for MSJ hearing.	5.9
2018.01.29	Perez 1	BER	Reviewed documents for Rash Curtis hearing on Tuesday, 1/30.	2.4
2018.01.29	Perez 1	JLH	Started TOCs and Printing docs for MSJ both P & D's.	4.3
2018.01.29	Perez 1	LTF	Discussed MSJ hearing and CMC with Yeremey Krivoshey.	0.3
2018.01.29	Perez 1	YOK	Continued preparing for MSJ hearing and discussed same with LTF, Jared Hazlett, and Randall Snyder.	8.2
2018.01.30	Perez 1	BER	Attended hearing in Oakland with LTF and YOK.	4
2018.01.30	Perez 1	JLH	Put together 3 books, 2 parts to Plaintiff's Motion for Summary Judgment, and 1 book for Defendant's MSJ.	6
2018.01.30	Perez 1	JLH	Created a master exhibit list for both Motions for Summary Judgment.	1
2018.01.30	Perez 1	LTF	Traveled to Oakland for MSJ hearing, attended hearing, met with Yeremey Krivoshey and Blair Reed following hearing and returned to Walnut Creek after hearing and discussed hearing with California lawyers.	4.5
2018.01.30	Perez 1	YOK	Prepared for MSJ hearing, traveled to Oakland for MSJ hearing and argued at hearing, met with LTF and Blair Reed to discuss hearing following hearing and traveled back to San Francisco following meeting.	8
2018.01.31	Perez 1	DLS	Assisted with audio exhibits for chambers.	0.4
2018.01.31	Perez 1	YOK	Wrote letter to chambers re audio exhibits and worked with Debbie Schroeder and Jared Hazlett to ensure that the audio exhibits were delivered properly, emailed counsel for Richardson re MSJ hearing, discussed MSJ hearing at firm meeting.	1
2018.02.01	Perez 1	DLS	Assisted with filing motion to seal.	1
2018.02.01	Perez 1	MCS	Uploaded Docs to Box.	0.1
2018.02.01	Perez 1	YOK	Call with court re sealing exhibit 15, drafted and filed motion to seal, Krivoshey declaration, and proposed order.	2
2018.02.02	Perez 1	LTF	Reviewed orders regarding MSJ and scheduling and circulated orders to lawyers.	0.5
2018.02.02	Perez 1	YOK	Reviewed order on MSJs.	0.5
2018.02.03	Perez 1	LTF	Email exchange with Scott Bursor and Yeremey Krivoshey regarding MSJ order and case schedule.	0.4
2018.02.03	Perez 1	YOK	Emails with LTF and SAB re MSJ order and trial plan.	0.4
2018.02.05	Perez 1	DLS	Prepared and filed Exhibit 15 Under Seal.	0.9
2018.02.05	Perez 1	JLH	Downloaded audio transcript to 2 USBs, helped prep them to send to court.	1

2018.02.05	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey (.7); sent MSJ ruling to mediator (.2); discussed case status and solvency of defendant with Scott Bursor (.2).	1.1
2018.02.05	Perez 1	MCS	Uploaded Docs on Box, Filed Transcript Request.	0.5
2018.02.05	Perez 1	MCS	Prepped Mail to go out (redacted audio file).	0.3
2018.02.05	Perez 1	YOK	Discussed trial plan with LTF and settlement, worked on redacting Exhibit 15 audio file and sending it to the Court and email exchange with Frances Stone re same, emails to clients, research re trial issues, email exchange with Richardson counsel re case strategy.	3.5
2018.02.06	Perez 1	LTF	Discussed case strategy with Scott Bursor and Yeremey Krivoshey.	0.4
2018.02.06	Perez 1	YOK	Discussions re case strategy with LTF and SAB and at firm meeting.	0.4
2018.02.07	Perez 1	LTF	Reviewed newsroom article regarding MSJ victory.	0.1
2018.02.07	Perez 1	YOK	Drafted newsroom article re MSJ victory and emailed SAB and LTF re same.	0.3
2018.02.12	Perez 1	LTF	Discussed trial strategy with Yeremey Krivoshey.	0.6
2018.02.12	Perez 1	YOK	Discuss trial strategy with LTF and began research for trial memo for SAB and LTF. Discussed check for VIC call log with LTF.	3
2018.02.14	Perez 1	YOK	Emails with defense counsel re VIC call log production, continued research and gathering trial materials.	3.1
2018.02.15	Perez 1	YOK	Reviewed email from defendant re VIC call logs. Continued gathering trial materials.	1.9
2018.02.16	Perez 1	YOK	Email exchanges with defendant re VIC call log issues. Continued working on trial memo.	3.2
2018.02.17	Perez 1	LTF	Reviewed emails regarding DAKCS production problems and exchanged emails with Yeremey Krivoshey regarding same.	0.2
2018.02.17	Perez 1	YOK	Reviewed email from defense counsel re VIC call logs and email exchanges with LTF re same.	0.2
2018.02.20	Perez 1	YOK	Emails with defense counsel re VIC call logs.	0.2
2018.02.21	Perez 1	LTF	Discussed DAKCS production problems and next steps with Yeremey Krivoshey.	0.4
2018.02.21	Perez 1	YOK	Call with Anya Verkhovskaya re expert disclosures, discuss trial strategy with LTF, emails with defense counsel re VIC call logs, reviewed call log production, continued trial prep.	3.1
2018.02.22	Perez 1	LTF	Discussed case status at firm meeting and discussed trial strategy and administrative motion to adjust schedule with Yeremey Krivoshey.	0.4
2018.02.22	Perez 1	YOK	Emailed defense counsel re VIC call logs, 2 calls with Colin Weir re VIC call logs and expert disclosures, continued gathering trial exhibits and deposition excerpts. Discussed case status at firm meeting and discussed administrative motion to adjust schedule with LTF.	3.6
2018.02.23	Perez 1	LTF	Reviewed administrative motion and discussed it with Yeremey Krivoshey.	0.2
2018.02.23	Perez 1	YOK	Emails with defense counsel re VIC call logs and sanctions. Drafted administrative motion and discussed it with LTF. Call with Colin Weir re expert disclosures.	5.3
2018.02.26	Perez 1	DLS	Finalized and filed administrative motion.	0.9

2018.02.26	Perez 1	MCS	Put together YOK Declaration.	0.7
2018.02.26	Perez 1	MCS	Uploaded docs to Box.	0.2
2018.02.26	Perez 1	YOK	Rewrote administrative motion in light of new information, drafted Krivoshey declaration and proposed order, assisted with filing. Continued trial prep.	7.2
2018.02.27	Perez 1	MCS	Prepared and sent out Chamber copies.	1.3
2018.02.27	Perez 1	YOK	Continued working on trial memo.	2.5
2018.02.28	Perez 1	LTF	Reviewed OSC order and order on administrative motion and exchanged emails with Debbie Schroeder regarding same.	0.5
2018.02.28	Perez 1	YOK	Reviewed orders re administrative motion/sanctions and order to show cause, discussed same with Debbie Schroeder and Josh Arisohn. Continued on working on trial prep materials.	3
2018.03.01	Perez 1	YOK	Reviewed 9th Circuit's Romero decision. Reviewed Defendant's response to order to show cause. Continued working on trial materials.	3.5
2018.03.02	Perez 1	YOK	Drafted and filed Plaintiffs' reply to defendant's response to order to show cause and opposition to plaintiffs' motion for sanctions, discussed same with LTF. Email correspondence with defendant re costs of DAKCS production.	5.4
2018.03.06	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re trial strategy.	0.2
2018.03.06	Perez 1	YOK	Call with SAB re trial plan.	0.2
2018.03.07	Perez 1	JDS	Met with LTF and YOK re status of case.	0.4
2018.03.07	Perez 1	LTF	Reviewed evidentiary hearing order and discussed it with Yeremey Krivoshey, Joel Smith and Scott Bursor (.6); organized emails (.2).	0.8
2018.03.07	Perez 1	YOK	Discussed evidentiary hearing and trial issues with LTF, SAB, and JDS, continued working on trial docs.	6.1
2018.03.08	Perez 1	DLS	Filed joint statement re compliance.	0.4
2018.03.08	Perez 1	LTF	Discussed trial strategy with Yeremey Krivoshey and participated in meet and confer call with defendant's counsel.	0.8
2018.03.08	Perez 1	YOK	Meet and confer call with defense counsel and LTF, discussed trial issues with LTF. Drafted statement re compliance and emailed defense counsel re same. Continued trial prep.	1.7
2018.03.12	Perez 1	LTF	Reviewed defendant's latest filing on DAKCS production.	0.2
2018.03.12	Perez 1	YOK	Emailed Molly Sasseen re new production and reviewed defendant's filing re DAKCS production.	0.3
2018.03.13	Perez 1	YOK	Analyzed newly produced call logs, research re motions in limine and continued assembling trial docs, emailed defense counsel re settlement, scheduling issues and discovery.	6.3
2018.03.14	Perez 1	LTF	Call with Scott Bursor re trial	0.4
2018.03.14	Perez 1	SAB	Videoconf. w/ T. Fisher re trial prep.	0.4
2018.03.14	Perez 1	YOK	Call with Colin Weir re expert report, call with Christina Peters of classexperts group, continued call log analysis, continued working on motions in limine.	7.7

2018.03.15	Perez 1	JLH	Worked with MCS to build YOK's book for sanctions hearing.	0.7
2018.03.15	Perez 1	LTF	Reviewed proposed schedule and discussed schedule with Yeremey Krivoshey as well as how to handle sanctions hearing.	0.4
2018.03.15	Perez 1	YOK	Prepared for sanctions hearing, drafted proposed amended schedule and discussed same with LTF, continued working on motions in limine.	7.3
2018.03.16	Perez 1	LTF	Traveled to Oakland for sanctions hearing, attended hearing and returned to Walnut Creek afterwards.	3
2018.03.16	Perez 1	YOK	Reviewed ACA decision, discussed same with LTF and Josh Arisohn, prepped for sanctions hearing, traveled to Oakland and argued at sanctions hearing, traveled to SF following hearing. Call with Colin Weir re expert report.	7.4
2018.03.19	Perez 1	YOK	Research re potential impact of ACA on trial, research re alternative strategy needed for motions in limine, research re defendant's anticipated motion for reconsideration, emailed McMillion.	4
2018.03.21	Perez 1	YOK	Continued research re ACA impact and motion for reconsideration.	3
2018.03.23	Perez 1	YOK	Continued research re anticipated motion for reconsideration.	2.5
2018.03.26	Perez 1	DLS	Filed transcript request.	0.4
2018.03.26	Perez 1	LTF	Discussed case status with Yeremey Krivoshey (.1); reviewed minute orders and discussed them with Debbie Schroeder and Mr. Krivoshey and reviewed emails regarding joint letter to Judge Gonzalez Rogers regarding errors in minute order (.3).	0.4
2018.03.26	Perez 1	MCS	Prepared transcript request.	0.5
2018.03.26	Perez 1	YOK	Emailed defense counsel re scheduling issue.	0.1
2018.03.27	Perez 1	LTF	Call with Scott Bursor re trial issues.	0.4
2018.03.27	Perez 1	SAB	Videoconf. w/ T. Fisher re trial preparation.	0.4
2018.03.27	Perez 1	YOK	Emailed McMillion. Continued research re motion for reconsideration.	0.8
2018.03.28	Perez 1	YOK	Reviewed hearing transcript re scheduling.	0.3
2018.03.30	Perez 1	LTF	Reviewed motion for reconsideration and discussed it briefly with Debbie Schroeder.	0.4
2018.04.02	Perez 1	DLS	Discussed Solano County docket and how to retrieve docs.	1
2018.04.02	Perez 1	JLH	Spoke with YOK and DLS about driving to Fairfield to pick up documents in May.	0.3
2018.04.02	Perez 1	YOK	Reviewed Defendant's motion for reconsideration and emailed defendant re Kizer transcript. Research re opposition to motion for reconsideration.	2.9
2018.04.03	Perez 1	SAB	Analyzed NCLC memo on the effect of ACA International.	1.5
2018.04.09	Perez 1	LTF	Discussed response to motion for reconsideration with Yeremey Krivoshey.	0.2
2018.04.09	Perez 1	YOK	Worked on opposition to motion for reconsideration and discussed same with LTF.	7.9
2018.04.10	Perez 1	YOK	Worked on opposition to motion for reconsideration.	6.8
2018.04.11	Perez 1	YOK	Continued working on opposition to motion for reconsideration.	7.5
2018.04.12	Perez 1	YOK	Continued working on opposition to motion for reconsideration.	7
2018.04.13	Perez 1	DLS	Finalized and filed opposition.	0.9

2018.04.13	Perez 1	YOK	Finalized and filed opposition to motion for reconsideration, discussed same with DLS, TAR, and MCS.	6.3
2018.04.16	Perez 1	MCS	Sent chambers copies of Motion for Reconsideration.	0.5
2018.04.23	Perez 1	YOK	Reviewed reply ISO motion for reconsideration, research re potential sur-reply.	2
2018.05.02	Perez 1	LTF	Reviewed order cancelling hearing and discussed same with Yeremey Krivoshey.	0.1
2018.05.02	Perez 1	YOK	Reviewed order re hearing and discussed with LTF.	0.1
2018.05.07	Perez 1	YOK	Research re new case law re ACA.	0.5
2018.05.11	Perez 1	YOK	Reviewed new filings re ACA.	0.2
2018.05.15	Perez 1	DLS	Filed notice of supplemental authority.	0.4
2018.05.15	Perez 1	LTF	Reviewed Reyes decision, sent it to Yeremey Krivoshey and discussed it with him and reviewed notice of supplemental authority.	0.4
2018.05.15	Perez 1	YOK	Reviewed Reyes decision, discussed same with LTF, searched for other related opinions, drafted and filed a notice of related case. Discussed same with Josh Arisohn.	1.5
2018.05.16	Perez 1	YOK	Reviewed Defendant's notice of supplemental authority and related case. Discussed same with LTF.	0.5
2018.05.21	Perez 1	YOK	Reviewed Defendant's notice of supplemental authority and related case and discussed same with LTF.	0.4
2018.05.23	Perez 1	DLS	Filed statement of decision.	0.4
2018.05.23	Perez 1	MCS	Chambers copy of supplemental authority.	0.2
2018.05.23	Perez 1	YOK	Filed notice of related case and reviewed Swaney decision, discussed same with LTF.	1
2018.05.24	Perez 1	DLS	Filed statement of decision.	0.4
2018.05.24	Perez 1	YOK	Research new ACA developments, filed notice of supplemental authority and reviewed the associated case.	1
2018.06.04	Perez 1	YOK	Email with client.	0.2
2018.06.08	Perez 1	LTF	Call with defendant's counsel regarding MIL exchange and reviewed email regarding same.	0.2
2018.06.18	Perez 1	LTF	Reviewed order on motion for reconsideration and exchanged emails with Yeremey Krivoshey and Scott Bursor regarding same.	0.4
2018.06.18	Perez 1	YOK	Reviewed order on motion for reconsideration and discussed same with Yitz Kopel and Josh Arisohn, emailed LTF re same. Emailed client.	0.8
2018.06.26	Perez 1	YOK	Emailed defendant re setting new CMC.	0.1
2018.06.27	Perez 1	YOK	Followed up with defendant re CMC.	0.1
2018.07.02	Perez 1	LTF	Discussed status report with Yeremey Krivoshey.	0.1
2018.07.02	Perez 1	YOK	Discussed status report with LTF. Emailed defendant re status conference. Research re motion for status conference.	1.2
2018.07.03	Perez 1	DLS	Made edits and formatting corrections to motion; finalized and filed.	0.6
2018.07.03	Perez 1	MCS	Prepared chambers copies.	0.5

2018.07.03	Perez 1	YOK	Drafted administrative motion to schedule CMC, drafted Krivoshey declaration in support, drafted proposed order. Discussed all with LTF and Debbie Schroeder and filed same.	3.9
2018.07.09	Perez 1	LTF	Call with Yeremey Krivoshey to discuss response to administrative motion to schedule CMC and reviewed filing.	0.4
2018.07.09	Perez 1	YOK	Reviewed opposition/response to administrative motion and call with LTF re same. Research re potential sanctions motion.	2.3
2018.07.10	Perez 1	LTF	Discussed trial and pre-trial schedule with Yeremey Krivoshey and Blair Reed and reviewed Judge Gonzalez Rogers pre-trial standing orders.	1.8
2018.07.10	Perez 1	YOK	Long discussion with LTF and BR re trial strategy and schedule and CMC, reviewed Court's pretrial orders. Continued research re sanctions motion.	3.8
2018.07.11	Perez 1	BER	Reviewed motions and orders.	2
2018.07.12	Perez 1	LTF	Discussed CMC date with defendant's counsel and exchanged emails with Yeremey Krivoshey regarding same.	0.3
2018.07.12	Perez 1	YOK	Emails re CMC with LTF.	0.1
2018.07.16	Perez 1	LTF	Reviewed motion to amend and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2018.07.16	Perez 1	YOK	Reviewed defendant's motion to amend and email with LTF re same	0.4
2018.07.17	Perez 1	LTF	Discussed motion to amend or correct with Blair Reed and emailed Yeremey Krivoshey regarding same.	0.2
2018.07.18	Perez 1	BER	Reviewed orders and documents.	1.5
2018.07.18	Perez 1	BER	Research re: interlocutory appeal.	0.5
2018.07.19	Perez 1	LTF	Reviewed research from Blair Reed regarding interlocutory appeals and exchanged emails with Yeremey Krivoshey and Ms. Reed regarding same.	0.3
2018.07.19	Perez 1	YOK	Reviewed BER's research re interlocutory appeal, emails with LTF and BER re same.	0.3
2018.07.20	Perez 1	BER	Follow up on research.	0.3
2018.07.23	Perez 1	YOK	Worked on opposition to motion to amend. Continued research re sanctions motion.	7.1
2018.07.24	Perez 1	LTF	Discussed sanctions motion with Yeremey Krivoshey.	0.4
2018.07.24	Perez 1	YOK	Continued working on sanctions motion. Discussion re same with LTF.	7.6
2018.07.26	Perez 1	YOK	Emailed defendant re settlement. Worked on opposition to motion to amend reconsideration order.	1.3
2018.07.27	Perez 1	YOK	Worked on opposition to motion to amend reconsideration order, and research re sanctions motion.	5.7
2018.07.30	Perez 1	DLS	Finalized and filed opposition.	0.8
2018.07.30	Perez 1	LTF	Reviewed opposition to motion seeking permission to appeal and discussed same with Yeremey Krivoshey.	0.4
2018.07.30	Perez 1	MCS	Sent Chamber Copies.	1.3
2018.07.30	Perez 1	MCS	Worked on tables, sent to YOK for review and finalize, assisted with filing.	2.5

2018.07.30	Perez 1	YOK	Call with Colin Weir re sanctions motion (.2), continued research re sanctions motion. Finished drafting opposition to motion to amend reconsideration order and assisted with filing same.	8.5
2018.07.31	Perez 1	YOK	Worked on sanctions motion. Emailed defendant re settlement.	4.8
2018.08.01	Perez 1	YOK	Worked on sanctions motion.	7.3
2018.08.02	Perez 1	LTF	Discussed sanctions motion with Yeremey Krivoshey.	0.3
2018.08.02	Perez 1	YOK	Worked on sanctions motion and discussed same with LTF.	8
2018.08.06	Perez 1	MCS	Used Rash Curtis call logs to search for mobile numbers, added info to excel sheet and send to YOK.	2
2018.08.06	Perez 1	YOK	Call with Colin Weir re sanctions motion, discussed same with Molly Sasseen, continued working on sanctions motion. Reviewed defendant's reply in support of motion to amend motion for reconsideration.	8.7
2018.08.07	Perez 1	YOK	Continued working on sanctions motion. Discussed same with Colin Weir.	7.1
2018.08.08	Perez 1	LTF	Email exchange with Yeremey Krivoshey and Blair Reed regarding CMC statement.	0.2
2018.08.08	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re potential sanctions motion for perjury.	0.4
2018.08.08	Perez 1	YOK	Email with LTF and BR re CMC statement. Call with SAB re sanctions motion. Continued working on sanctions motion.	7.8
2018.08.09	Perez 1	BER	Review materials for CMC statement.	3.8
2018.08.09	Perez 1	BER	Prepare template for CMC statement.	0.3
2018.08.09	Perez 1	LTF	Reviewed sanctions motion and exchanged emails with Yeremey Krivoshey regarding same.	0.9
2018.08.09	Perez 1	YOK	Continued working on sanctions motion. Circulated draft to LTF and SAB, and email exchanges re same with LTF.	7.8
2018.08.10	Perez 1	BER	Reviewed sanctions motion and materials.	2
2018.08.10	Perez 1	DLS	Prepared TOC/TOA; Finalized all documents; filed and served confidential documents.	4
2018.08.10	Perez 1	JLH	Stitched together deposition documents for YOK's declaration.	0.5
2018.08.10	Perez 1	SAB	Revised draft sanctions motion.	3
2018.08.10	Perez 1	YOK	Continued working on sanctions motion, reviewed SAB's redlines re same and call with SAB re same, drafted associated declaration and finalized Weir declaration and proposed order, drafted/edited administrative motion to seal docs, redacted public filings, filed all of the above. Discussions with BER, TAR, JLH, DLS re same.	9.4
2018.08.13	Perez 1	BER	Drafted CMC outline.	1
2018.08.13	Perez 1	MCS	Chambers copies (.7) and mail service to defense counsel (.8).	1.5
2018.08.15	Perez 1	BER	Reviewed materials for CMC statement.	1.5
2018.08.15	Perez 1	LTF	Email exchange with opposing counsel, Debbie Schroeder and Yeremey Krivoshey regarding scheduling on sanctions motion.	0.5
2018.08.15	Perez 1	YOK	Email with McMillion. Reviewed defendant's email re sanctions motion and emailed LTF re same.	0.2
2018.08.16	Perez 1	BER	Circulated CMC template to LTF.	0.2

2018.08.16	Perez 1	LTF	Worked on CMC statement and discussed it with Blair Reed and exchanged emails with Yeremey Krivoshey regarding same (2.1); reviewed and approved stipulation regarding briefing schedule on sanctions motion (.2).	2.3
2018.08.16	Perez 1	YOK	Reviewed CMC statement and emailed LTF re same.	0.3
2018.08.17	Perez 1	LTF	Reviewed administrative motion and exchanged emails with defendant's counsel regarding same.	0.7
2018.08.19	Perez 1	LTF	Reviewed revised CMC statement and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2018.08.19	Perez 1	YOK	Emailed LTF re CMC statement.	0.2
2018.08.20	Perez 1	DLS	Finalized and filed joint CMC statement.	0.4
2018.08.20	Perez 1	LTF	Worked on CMC statement and discussed it with Yeremey Krivoshey and arranged for it to be filed.	1.6
2018.08.20	Perez 1	MCS	Assisted with filing CMC statement, sent chambers copy.	0.9
2018.08.20	Perez 1	YOK	Discussed CMC statement with LTF.	0.3
2018.08.22	Perez 1	LTF	Discussed CMC and hearing on motion for permission to appeal with Yeremey Krivoshey and Blair Reed.	0.2
2018.08.22	Perez 1	YOK	Discussed CMC/hearing re motion for permission to appeal with LTF and BER	0.2
2018.08.23	Perez 1	YOK	Prepared for hearing re motion to amend reconsideration ruling, strategized re amended expert reports, prepared for CMC.	1.3
2018.08.24	Perez 1	YOK	Prepped for CMC and motion hearing. Continued research re amended expert reports.	1.4
2018.08.27	Perez 1	BER	Prepared for and attended CMC w/LTF and YOK.	6
2018.08.27	Perez 1	DLS	Prepared and filed notice of appearance for BER.	0.6
2018.08.27	Perez 1	LTF	Traveled to Oakland for CMC and hearing on motion for permission to appeal, attended hearing and returned to Walnut Creek afterwards and discussed hearing with Yeremey Krivoshey, Blair Reed, Thomas Reyda and Joel Smith.	5
2018.08.27	Perez 1	YOK	Prepped for hearing, traveled to Oakland for hearing, discussed hearing with LTF and BER.	6.5
2018.08.28	Perez 1	LTF	Discussed case schedule and strategy with Scott Bursor and Yeremey Krivoshey.	0.8
2018.08.28	Perez 1	YOK	Discussion re case schedule and trial issues with LTF. Further research re sanctions motion. Continued working on amended expert disclosures and gathering information for experts.	6.4
2018.08.29	Perez 1	LTF	Discussed case strategy and scheduling of trial team meeting with Yeremey Krivoshey and Thomas Reyda and sent calendar invite to colleagues.	0.4
2018.08.29	Perez 1	YOK	Discussed case strategy and schedule with LTF and BAR. Call with Randy Snyder, call with Colin Weir, call with Anya Verkhovskaya regarding expert reports and notice. Research re expert reports.	5.9
2018.08.30	Perez 1	DLS	Prepared and filed transcript request.	0.5
2018.08.30	Perez 1	LTF	Discussed material for sanctions reply with Yeremey Krivoshey.	0.4
2018.08.30	Perez 1	YOK	Continued working on expert reports and discussed same with LTF.	6.6



2018.08.31	Perez 1	LTF	Discussed pre-trial deadlines and sanctions hearing with Yeremey Krivoshey, Thomas Reyda and Debbie Schroeder.	0.4
2018.08.31	Perez 1	YOK	Emailed Perez. Emailed defendant re settlement. Continued working on amended expert reports. Continued research re sanctions motion.	5.2
2018.09.03	Perez 1	YOK	Emailed plaintiff.	0.1
2018.09.05	Perez 1	LTF	Discussed meeting with plaintiff with Yeremey Krivoshey and discussed trial strategy.	0.3
2018.09.05	Perez 1	YOK	Traveled to Sacramento from El Cerrito for meeting with Plaintiff Perez, meeting with Perez re trial and case update, traveled back to Walnut Creek following meeting. Discussed Perez meeting and trial issues with LTF following meeting.	5
2018.09.07	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding team meeting.	0.1
2018.09.07	Perez 1	YOK	Reviewed defendant's opposition to motion for sanctions. Emailed defendant to request that Defendant produced 1-4 account data.	1.3
2018.09.08	Perez 1	LTF	Telephone call and email exchange with Yeremey Krivoshey regarding defendant's opposition to sanctions motion and next steps.	0.5
2018.09.08	Perez 1	YOK	Call and email with LTF re opposition brief and strategy (.5), 2 calls with Colin Weir re supplemental report (.5), research re reply in support of sanctions (1.3).	2.3
2018.09.09	Perez 1	YOK	Call with Colin Weir re supplemental report.	0.1
2018.09.10	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey and Colin Weir.	0.5
2018.09.10	Perez 1	YOK	Multiple lengthy emails with defendant re phone field 1-4 production. Call with Colin Weir and LTF re supplemental report and discussed same with LTF.	1
2018.09.11	Perez 1	DLS	Finalized and filed administrative motion for extension of time; emailed proposed order to Judge.	0.8
2018.09.11	Perez 1	LTF	Reviewed draft administrative motion and discovery dispute letter and discussed both with Yeremey Krivoshey.	0.8
2018.09.11	Perez 1	MCS	Assisted with finalizing and filing Admin Motion, sent Chambers Copies to YGR.	1.3
2018.09.11	Perez 1	YOK	Drafted and circulated Plaintiff's portion of joint discovery statement and discussed same with LTF. Drafted and filed administrative motion to extend pretrial deadlines and reviewed Weir declaration.	8
2018.09.13	Perez 1	LTF	Discussed email exchange with defendant's counsel with Yeremey Krivoshey.	0.2
2018.09.13	Perez 1	YOK	Emails with defendant re 1-4 phone field account sample, provided defendant with sample, discussed same with LTF.	0.4
2018.09.17	Perez 1	LTF	Discussed opposition to administrative motion and next steps with Yeremey Krivoshey.	0.4
2018.09.17	Perez 1	MCS	Assisted with filing discovery dispute statement.	0.5
2018.09.17	Perez 1	YOK	Reviewed defendant's opposition to motion to extend pretrial deadlines, finalized and filed joint statement re discovery. Discussed case strategy with LTF. Worked on reply ISO motion for sanctions.	5.2
2018.09.18	Perez 1	DLS	Scheduled Courtcall for LTF & YOK.	0.5
2018.09.18	Perez 1	LTF	Reviewed order regarding discovery hearing and discussed same with Yeremey Krivoshey and Debbie Schroeder.	0.4

2018.09.18	Perez 1	MCS	Sent chambers copies to YGR.	0.5
2018.09.18	Perez 1	YOK	Discussed discovery issue with LTF. Continued working on reply ISO sanctions motion.	5.2
2018.09.19	Perez 1	YOK	Continued working on reply ISO sanctions motion.	7.9
2018.09.20	Perez 1	LTF	Discussed discovery dispute hearing with Yeremey Krivoshey (.2); reviewed sanctions reply (.5); prepared for discovery hearing (.6).	1.3
2018.09.20	Perez 1	YOK	Discussed discovery hearing and sanctions reply brief with LTF. Continued working on reply brief ISO motion for sanctions and the Krivoshey declaration re same.	5.3
2018.09.21	Perez 1	DLS	Finalized and filed reply re motion for sanctions.	1
2018.09.21	Perez 1	LTF	Prepared for discovery dispute call, call with defendant's counsel regarding re-scheduling call, participated in discovery dispute call and briefed Yeremey Krivoshey afterwards (1.4); assisted with finalizing and filing sanctions reply and discussed it with Debbie Schroeder (.7).	2.1
2018.09.21	Perez 1	YOK	Call and texts with LTF re discovery hearing and sanctions reply brief.	0.2
2018.09.24	Perez 1	DLS	Set up courtcall.	0.4
2018.09.24	Perez 1	LTF	Discussed discovery hearing with Yeremey Krivoshey and discussed CourtCall appearance with Debbie Schroeder.	0.2
2018.09.24	Perez 1	YOK	Discussed discovery hearing with LTF.	0.2
2018.09.25	Perez 1	DLS	Set up courtcall.	0.4
2018.09.25	Perez 1	LTF	Prepared for discovery hearing and re-scheduled hearing when Judge Corley became unavailable.	0.4
2018.09.25	Perez 1	YOK	Prepared for discovery hearing with LTF, sat in on hearing, discussed same with Debbie Schroeder.	0.4
2018.09.26	Perez 1	YOK	Call with Randy Snyder re expert report.	0.1
2018.09.27	Perez 1	DLS	Prepared and filed transcript request.	0.5
2018.09.27	Perez 1	DLS	Finalized and filed supplemental brief.	0.5
2018.09.27	Perez 1	LTF	Participated in discovery dispute hearing and discussed it with Yeremey Krivoshey, Joel Smith and Fred Klorczyk afterwards (.8); reviewed supplemental brief and discussed it with Mr. Krivoshey and Debbie Schroeder (.4); reviewed reply regarding supplemental brief and discussed it with Mr. Krivoshey and Ms. Schroeder (.4).	1.6
2018.09.27	Perez 1	YOK	Discussed discovery hearing with LTF, drafted supplemental brief re administrative motion to extend deadlines and discussed same with LTF and Debbie Schroeder, reviewed D's reply re administrative motion.	1.8
2018.09.28	Perez 1	LTF	Discussed sanctions hearing game plan and other issues with Yeremey Krivoshey.	0.8
2018.09.28	Perez 1	YOK	Lengthy conversation with LTF re sanctions hearing and case strategy, reviewed transcript from discovery hearing. Call with D's counsel re expert report deadlines.	0.9
2018.10.01	Perez 1	BER	Reviewed order vacating sanctions hearing (.1); Conf. w/YOK re: same (.1).	0.2
2018.10.01	Perez 1	BER	Reviewed sanctions briefing for hearing 10/2.	1
2018.10.01	Perez 1	LTF	Reviewed hearing book and discussed hearing with Yeremey Krivoshey (.8); reviewed order cancelling hearing and discussed it with Mr. Krivoshey and Joel Smith (.3).	1.1

2018.10.01	Perez 1	MCS	Prepared YOK and LTF books for sanctions hearing.	3
2018.10.01	Perez 1	YOK	Prepped for sanctions hearing prior to getting order vacating hearing, discussed hearing with LTF and JDS.	6.2
2018.10.02	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey.	0.1
2018.10.02	Perez 1	YOK	Research re amended Snyder report.	1.5
2018.10.03	Perez 1	LTF	Reviewed letter to Judge Corley and discussed it with Yeremey Krivoshey and reviewed emails regarding same.	0.3
2018.10.03	Perez 1	YOK	Call with Snyder re report (1.2) and prep for call (.8). Reviewed defendant's filed letter and discussed same with LTF (.3).	2.3
2018.10.04	Perez 1	LTF	Discussed discovery issue with Yeremey Krivoshey, reviewed discovery order and reviewed emails regarding same.	0.2
2018.10.04	Perez 1	SAB	Read briefs on motion for sanctions and administrative motion for discovery of fields 1-4.	1
2018.10.04	Perez 1	YOK	Reviewed discovery order, multiple emails with defendant re account record production and discussed same with LTF.	0.5
2018.10.05	Perez 1	LTF	Discussed discovery issue with Yeremey Krivoshey and reviewed emails regarding same.	0.3
2018.10.05	Perez 1	YOK	Multiple emails with defendant re new doc production and discussed same with LTF.	0.7
2018.10.08	Perez 1	LTF	Reviewed emails regarding document production and discussed same with Yeremey Krivoshey.	0.3
2018.10.08	Perez 1	YOK	Multiple lengthy emails with defendant re new production, discussed same with LTF.	0.6
2018.10.10	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey and reviewed emails regarding same.	0.4
2018.10.10	Perez 1	LTF	Reviewed emails from defendant's counsel and Yeremey Krivoshey regarding production of phone fields Nos. 1-4 and discussed defendant's letter regarding clawback request with Mr. Krivoshey and reviewed same (.8); discussed trial schedule with Colin Weir and Mr. Krivoshey (.1).	0.9
2018.10.10	Perez 1	YOK	Multiple lengthy emails with defendant re new account production, reviewed Defendant's ex parte letter and emailed defendant re same, discussed same and scheduling issues with LTF.	2
2018.10.11	Perez 1	DLS	Finalized and filed response.	0.5
2018.10.11	Perez 1	LTF	Reviewed response to defendant's letter brief, discussed it with Yeremey Krivoshey and reviewed Court's order and discussed the order with Mr. Krivoshey (.8); reviewed motion to set aside Judge Corley's order and exchanged emails with Yeremey Krivoshey regarding same (.2).	1
2018.10.11	Perez 1	YOK	Drafted and filed response to Defendant's letter brief and multiple discussions with LTF and Debbie Schroeder re same, emails with defendant re production and its letter brief, reviewed Judge Corley's order re letter brief and discussed same with LTF. Reviewed Defendant's motion to set aside Judge Corley's letter brief and emailed LTF re same.	7.5
2018.10.12	Perez 1	LTF	Reviewed motion to set aside Judge Corley's order and discussed it further with Yeremey Krivoshey.	0.4

2018.10.12	Perez 1	YOK	Discussed defendant's motion to set aside Judge Corley's discovery order with LTF and researched re same.	0.6
2018.10.15	Perez 1	YOK	Research re Snyder declaration.	1
2018.10.16	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey and Colin Weir and reviewed email from defendant's counsel updating on status of historic production.	0.7
2018.10.16	Perez 1	YOK	Discussed new sanctions declaration with Colin Weir and LTF, responded to defendant's email re new production. Research re Anya Verkhovskaya declaration and Snyder report.	1.7
2018.10.17	Perez 1	YOK	Emailed client. Emailed defendant re settlement.	0.2
2018.10.19	Perez 1	LTF	Reviewed emails regarding historical production.	0.1
2018.10.22	Perez 1	DLS	Finalized and filed stipulation; emailed proposed order to Judge.	0.6
2018.10.22	Perez 1	LTF	Discussed trial strategy with Yeremey Krivoshey and reviewed email exchange between defendant's counsel and Mr. Krivoshey.	0.3
2018.10.22	Perez 1	MCS	Finalized stipulation and assist with filing.	1.3
2018.10.22	Perez 1	YOK	Call with Colin Weir re supplemental report. Discussed production issues and pretrial deadlines with LTF and emailed defendant re phone field 1-4 account data production. Drafted and filed stipulation re expert disclosures and notice plan, emailed defednant re same.	2
2018.10.23	Perez 1	YOK	Call with Colin Weir re supplemental report and reviewed docs re same.	0.5
2018.10.25	Perez 1	LTF	Reviewed proposed case schedule and exchanged emails with Yeremey Krivoshey regarding same.	0.3
2018.10.25	Perez 1	YOK	Call with Colin Weir re supplemental report. Drafted and circulated draft joint CMC statement and emailed LTF re same. Call with Randy Snyder re amended expert report.	3
2018.10.29	Perez 1	DLS	Finalized and filed CMC statement.	0.4
2018.10.29	Perez 1	LTF	Discussed CMC statement and expert deadlines with Yeremey Krivoshey.	0.2
2018.10.29	Perez 1	YOK	Reviewed supplemental Weir declaration, call with Anya Verkhovskaya re declaration and notice issues, email with Defendant re CMC statement and discussed same with LTF, finalized and filed CMC statement. Research re Snyder amended report.	3
2018.10.30	Perez 1	MCS	Sent chamber copies to YGR.	0.3
2018.11.02	Perez 1	LTF	Discussed case status with Yeremey Krivoshey and Debbie Schroeder.	0.2
2018.11.02	Perez 1	YOK	Discussed expert reports and sanctions supplement with LTF and Debbie Schroeder.	0.2
2018.11.04	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding notice costs.	0.2
2018.11.04	Perez 1	YOK	Email with LTF re class notice costs.	0.2
2018.11.05	Perez 1	LTF	Discussed supplemental declaration with Colin Weir.	0.1
2018.11.05	Perez 1	YOK	Call with Yitz Kopel re notice costs.	0.6
2018.11.06	Perez 1	DLS	Finalized and filed motion for leave to file evidence.	0.7
2018.11.06	Perez 1	LTF	Reviewed motion for leave to file supplemental brief and discussed same with Yeremey Krivoshey (.4) and discussed notice plan with Mr. Krivoshey (.3).	0.7
2018.11.06	Perez 1	MCS	Finalized and assisted with filing sanctions supplement.	1.2

2018.11.06	Perez 1	YOK	Drafted and filed motion for leave to file Weir supplement re sanctions motion. Discussed motion for leave and notice plan with LTF. Discussed Weir declaration with Colin Weir.	8.2
2018.11.07	Perez 1	LTF	Discussed trial plan at firm meeting and discussed same with Yeremey Krivoshey.	0.2
2018.11.07	Perez 1	YOK	Worked on motion for approval of notice plan and discussed trial plan with LTF.	2
2018.11.08	Perez 1	YOK	Emailed KCC re notice plan. Continued working on notice motion. Calls with CEG re Verkhovskaya declaration and notice issues, and reviewed draft Verkhovskaya declaration. Reviewed draft Snyder amended declaration.	6.8
2018.11.09	Perez 1	LTF	Discussed notice plan and transcript request with Yeremey Krivoshey and Debbie Schroeder.	0.3
2018.11.09	Perez 1	YOK	Continued working on notice motion and called experts re expert reports, discussed same with LTF. Call with Anthony Valenti re transcript request.	7.5
2018.11.12	Perez 1	LTF	Discussed expert reports with Yeremey Krivoshey and arranged for service of reports (.4); reviewed defendant's expert reports (.4).	0.8
2018.11.12	Perez 1	YOK	Finalized and filed notice plan. Worked with experts to finalize expert reports and Verkhovskaya declaration and served same. Reviewed Defendant's non-retained expert reports.	8.8
2018.11.13	Perez 1	LTF	Discussed defendant's expert reports and case strategy with Yeremey Krivoshey.	0.4
2018.11.13	Perez 1	MCS	Sent chambers copies to YGR.	0.2
2018.11.13	Perez 1	YOK	Analyzed Defendant's non-retained expert reports and discussed same with LTF. Discussed Snyder invoice with Debbie Schroeder. Emailed Defendant data re Verkhovskaya report.	0.6
2018.11.20	Perez 1	YOK	Email with KCC re notice plan. Discussed Verkhovskaya invoice with Debbie Schroeder and LTF.	0.2
2018.11.27	Perez 1	LTF	Discussed expert deposition schedule with Yeremey Krivoshey and reviewed emails regarding same.	0.2
2018.11.27	Perez 1	YOK	Extensive meet and confer emails with defendant re deposition scheduling, discussions with LTF re same.	2
2018.11.28	Perez 1	LTF	Discussed expert deposition scheduling issues with Yeremey Krivoshey and reviewed emails regarding same.	0.5
2018.11.28	Perez 1	YOK	Continued extensive meeting and conferring with defendant re deposition scheduling and costs/expenses issue. Research expert cost issue.	2.7
2018.11.29	Perez 1	LTF	Discussed deposition schedule with Yeremey Krivoshey and reviewed emails regarding same.	0.2
2018.11.30	Perez 1	LTF	Discussed expert depositions with Yeremey Krivoshey and reviewed emails regarding same.	0.3
2018.11.30	Perez 1	YOK	Meet and confer emails with defendant re depositions. Booked travel for Verkhovskaya deposition in Milwaukee. Discussed case strategy and depositions with LTF.	2
2018.12.03	Perez 1	YOK	Prepped for Verkhovskaya depo.	3.2
2018.12.04	Perez 1	YOK	Flight to Milwaukee for Verkhovskaya depo and prepped for same.	12.2
2018.12.05	Perez 1	DLS	Finalized and served objections to depositions.	0.5

2018.12.05	Perez 1	YOK	Met and prepped with Verkhovskaya re depo and prepared for same (3.0), drafted depo notice objections/responses for Colin Weir, Verkhovskaya, and Snyder and emailed Debbie Schroeder re same (2.2).	5.2
2018.12.06	Perez 1	LTF	Exchanged messages with Yeremey Krivoshey regarding Verkhovskaya deposition.	0.1
2018.12.06	Perez 1	YOK	Emails with Rebecca Richter re Snyder invoice (.2), met with Anya Verkhovskaya prior to deposition to prep (1.0), defended Verkhovskaya depo and traveled back home from Milwaukee following deposition (12.4).	13.6
2018.12.07	Perez 1	LTF	Email exchange with Yeremey Krivoshey regarding production of expert emails and research regarding applicable federal rule.	0.4
2018.12.07	Perez 1	YOK	Emails with defense counsel re supplemental production and email with LTF re same. Prepped for Weir depo and discussed same with Colin Weir.	3.4
2018.12.10	Perez 1	LTF	Discussed Verkhovskaya deposition and Weir deposition with Yeremey Krivoshey (.4); discussed various depo issues with Colin Weir and Mr. Krivoshey (.3).	0.7
2018.12.10	Perez 1	YOK	Prepped for Weir and Snyder depositions, met and prepped with Weir, discussed Weir depo with LTF, gathered docs for production.	6.8
2018.12.11	Perez 1	YOK	Met with Weir prior to depo, traveled with Weir to depo in Oakland, defended Weir deposition, meeting with Weir following deposition.	6.6
2018.12.11	Perez 1	RSR	Organized all Wireless Research Services invoices and sent to DLS for Snyder depo.	0.2
2018.12.16	Perez 1	YOK	Prepped for meeting with Snyder, met and prepped with Snyder for deposition and traveled to and from meeting.	4.2
2018.12.17	Perez 1	YOK	Met with Snyder prior to depo, traveled to depo and defended Snyder depo, meeting with Snyder following depo.	7.8
2018.12.21	Perez 1	LTF	Discussed expert document production with Yeremey Krivoshey.	0.3
2018.12.21	Perez 1	YOK	Assembled email and invoice production for Snyder, Weir, and Verkhovskaya and served on defendant. Discussed same with LTF. Reviewed latest Snyder invoice and emailed RSR re same.	5.3
2018.12.28	Perez 1	DLS	Prepared production docs for service.	0.5
2019.01.02	Perez 1	YOK	Reviewed docs for privilege check and emailed defense counsel re same.	0.6
2019.01.04	Perez 1	YOK	Email with Debbie Schroeder re Weir transcript. Reviewed Weir transcript and worked on exhibit list.	2.1
2019.01.07	Perez 1	LTF	Discussed trial strategy and upcoming deadlines with Yeremey Krivoshey and Blair Reed.	0.6
2019.01.07	Perez 1	YOK	Discussed scheduling/trial issues with LTF.	0.6
2019.01.08	Perez 1	LTF	Discussed settlement of individual claims with Yeremey Krivoshey and reviewed emails regarding same.	1
2019.01.08	Perez 1	YOK	Long conversations with LTF re settling individual claims and regarding exhibit list and trial strategy (1.0). Emails with defendant re settlement and calls with clients re same (.9). Email with defendant re exhibit list (.1). Research re exhibit list and transcript designations and worked on same (5.9).	6.9
2019.01.09	Perez 1	BER	Review materials for trial.	1.1

2019.01.09	Perez 1	BER	Prepared for and attended trial team meeting w/LTF and YOK.	1
2019.01.09	Perez 1	LTF	Discussed pre-trial game plan with Yeremey Krivoshey, Blair Reed, and Debbie Schroeder and reviewed pre-trial order.	0.9
2019.01.09	Perez 1	YOK	Team meeting with LTF, BER, and Debbie Schroeder re trial plan (.9), multiple email exchanges and call with McMillion re settlement (.5), continued working on exhibit list and transcript designations (5.6).	7
2019.01.10	Perez 1	LTF	Discussed trial plan and related case strategy issues with Yeremey Krivoshey.	0.8
2019.01.10	Perez 1	YOK	Discussed trial issues with LTF (.8), discussions with McMillion and Adekoya re settlement and circulated signed settlement pages to defendant (.6), continued working on exhibit list and transcript designations (5.8).	7.2
2019.01.11	Perez 1	JLH	Reviewed Rash Curtis Privilege Logs for YOK.	1
2019.01.11	Perez 1	LTF	Discussed exhibit list and deposition designations with Yeremey Krivoshey.	0.5
2019.01.11	Perez 1	YOK	Finalized and served exhibit list and deposition transcript designations, discussed same with LTF. Reviewed Defendant's exhibit list.	7.8
2019.01.14	Perez 1	BER	Reviewed materials for trial.	1
2019.01.14	Perez 1	YOK	Researched re motions in limine.	1.6
2019.01.15	Perez 1	LTF	Discussed trial and plaintiff Perez's testimony with Yeremey Krivoshey.	0.4
2019.01.15	Perez 1	YOK	Call/emails with Plaintiff Perez, discussions with LTF re trial issues.	0.9
2019.01.16	Perez 1	BER	Reviewed materials for trial.	0.7
2019.01.16	Perez 1	LTF	Reviewed email from Yeremey Krivoshey regarding exhibit issues.	0.1
2019.01.16	Perez 1	YOK	Emailed defendant to meet and confer re exhibit list. Researched re motions in limine.	3.8
2019.01.17	Perez 1	BER	Reviewed materials for trial.	0.9
2019.01.17	Perez 1	YOK	Extensive meet and confer emails regarding Defendant's exhibit list and failure to produce exhibits, continued research re motions in limine.	6.3
2019.01.18	Perez 1	BER	Reviewed materials for trial.	1.2
2019.01.21	Perez 1	BER	Reviewed materials for trial.	0.6
2019.01.21	Perez 1	YOK	Worked on motions in limine.	6.5
2019.01.22	Perez 1	BER	Conf. w/LTF re: meeting.	0.1
2019.01.22	Perez 1	BER	Reviewed court orders in preparation for trial.	1.3
2019.01.22	Perez 1	DLS	Worked on draft pleading docs.	0.6
2019.01.22	Perez 1	LTF	Reviewed emails regarding defendant's exhibits and discussed same with Yeremey Krivoshey.	0.2
2019.01.22	Perez 1	YOK	Extensive emails with defendant re defendant's exhibit list. Continued working on MILs.	7.7
2019.01.23	Perez 1	BER	Trial team meeting w/LTF and YOK.	1
2019.01.23	Perez 1	BER	Conf. w/DLS re: pretrial statement.	0.2
2019.01.23	Perez 1	BER	Reviewed order (.7); Conf. w/LTF and YOK re: same (.2).	0.9
2019.01.23	Perez 1	BER	Review materials for pretrial statement.	1.7

2019.01.23	Perez 1	DLS	Worked on draft trial pleading docs.	2.4
2019.01.23	Perez 1	DLS	Attended trial meeting.	1
2019.01.23	Perez 1	LTF	Reviewed sanctions order and discussed it with Yeremey Krivoshey, Thomas Reyda and Debbie Schroeder (.4); trial team meeting (1).	1.4
2019.01.23	Perez 1	YOK	Trial team meeting (1.0), discussed sanctions order with LTF, BER, and Debbie Schroeder (.4), emailed SAB re same (.1) continued working on MILs (6.5), emailed defendant re meet and confer call (.1).	8.1
2019.01.24	Perez 1	BER	Reviewed trial materials.	0.6
2019.01.24	Perez 1	DLS	Prepared motion for sanctions documents to be refiled pursuant to order and filed.	2
2019.01.24	Perez 1	LTF	Drafted motions in limine regarding defendant's failure to submit deposition designations and to preclude evidence regarding what will happen to defendant's business if a large verdict is rendered and discussed same with Brittany Scott.	3.8
2019.01.24	Perez 1	YOK	Continued working on motions in limine and discussed same with LTF.	7.4
2019.01.25	Perez 1	BER	Conf. w/LTF re: pretrial statement.	0.1
2019.01.25	Perez 1	BER	Reviewed YOK and LTF drafts of motions in limine.	1
2019.01.25	Perez 1	BER	Conf. w/YOK re: motions in limine.	0.1
2019.01.25	Perez 1	BER	Researched best evidence rule (.3); Conf. w/YOK re: same (.2).	0.5
2019.01.25	Perez 1	DLS	Worked on trial pleadings.	1.2
2019.01.25	Perez 1	LTF	Reviewed and revised MILs and discussed same with Yeremey Krivoshey (1.6); discussed pre-trial conference statement with Blair Reed and began work on pre-trial conference statement (.4).	2
2019.01.25	Perez 1	YOK	Finished working on MILs, finalized same, discussed redlines and edits with Blair Reed and LTF, served motions in limine. Reviewed Defendant's motion in limine and emailed LTF/BR re same, and emailed Defendant re same.	8
2019.01.27	Perez 1	LTF	Reviewed documents for disputed and undisputed facts section of pre-trial conference statement.	0.8
2019.01.28	Perez 1	BER	Reviewed Defendant's Daubert motion.	0.8
2019.01.28	Perez 1	BER	Reviewed Defendant's motion in limine.	0.7
2019.01.28	Perez 1	BER	Reviewed materials for disputed facts.	0.3
2019.01.28	Perez 1	LTF	Discussed MILs and Daubert motions and other trial related issues with Yeremey Krivoshey (1); worked on pre-trial conference statement (2.8).	3.8
2019.01.28	Perez 1	YOK	Long discussiosn with LTF re trial strategy and dauberts/MILs. Reviewed Defendant's Daubert motions and emailed LTF re same. Emailed defense counsel re meet and confer.	3.7
2019.01.29	Perez 1	BER	Drafted section of pretrial statement.	1.3
2019.01.29	Perez 1	BER	Reviewed materials for legal elements of claims.	0.6
2019.01.29	Perez 1	LTF	Discussed Daubert motions with Yeremey Krivoshey and reviewed motions (1.2); continued work on pre-trial conference statement (1.3).	2.5
2019.01.29	Perez 1	YOK	Worked on opposition to Dauberts, multiple discussions and emails with LTF re same.	7.4



2019.01.30	Perez 1	BER	Trial team meeting w/LTF and YOK.	0.5
2019.01.30	Perez 1	LTF	Worked on disputed and undisputed facts and discussed various trial and Daubert issues with Yeremey Krivoshey (3.7); trial team meeting (.5).	4.2
2019.01.30	Perez 1	YOK	Continued working on Daubert oppositions. Discussed Daubert and trial strategy with LTF and BER at trial team meeting. Emails with defendant re setting up meet and confer call.	8.1
2019.01.31	Perez 1	BER	Prepared for and attended meet and confer call w/LTF and YOK.	0.5
2019.01.31	Perez 1	LTF	Prepared for and participated in meet and confer regarding pre-trial conference statement (.6); discussed Daubert motion and trial strategy with Scott Bursor and Yeremey Krivoshey (.5); discussed Daubert and trial issues with Mr. Krivoshey and reviewed emails regarding same (.7).	1.8
2019.01.31	Perez 1	SAB	Videoconf. w/ T. Fisher & Y. Krivoshey re analysis of defendants' Daubert motions.	0.5
2019.01.31	Perez 1	YOK	Participated on meet and confer call re joint pretrial conference statement, call with LTF and SAB re Daubert and trial issues, multiple discussions with LTF re Daubert/trial issues, continued working on oppositions to Daubert motions. Drafted and circulated stipulation re compliance with meet and confer requirement for joint pretrial conference statement.	8.5
2019.01.31	Perez 1	RSR	Created Daubert briefing book for SAB (.5).	0.5
2019.02.01	Perez 1	BER	Prepared pretrial binder documents.	0.8
2019.02.01	Perez 1	DLS	Finalized and filed statement of compliance.	0.4
2019.02.01	Perez 1	LTF	Worked on my sections of pre-trial conference statement and discussed filing of compliance statement with Debbie Schroeder.	1.4
2019.02.01	Perez 1	YOK	Continued working on Daubert oppositions. Reviewed and filed compliance statement. Email with defense counsel re McMillion and Adekoya settlement.	7.8
2019.02.04	Perez 1	BER	Reviewed pretrial statement.	0.2
2019.02.04	Perez 1	LTF	Discussed Daubert oppositions with Yeremey Krivoshey.	0.1
2019.02.04	Perez 1	YOK	Continued workin on Daubert oppositions, discussed same with LTF and TAR.	7.5
2019.02.05	Perez 1	BER	Conf. w/LTF re: Pretrial statement.	0.1
2019.02.05	Perez 1	BER	Drafted pretrial statement.	1.2
2019.02.05	Perez 1	BER	Reviewed materials for trial.	1
2019.02.05	Perez 1	LTF	Reviewed and revised pre-trial conference statement and discussed various trial issues with Yeremey Krivoshey.	1.8
2019.02.06	Perez 1	BER	Reviewed Snyder Daubert Opposition.	0.8
2019.02.06	Perez 1	BER	Prepared for and attend trial team meeting.	1.2
2019.02.06	Perez 1	DLS	Attended trial meeting.	0.4
2019.02.06	Perez 1	DLS	Prepared declaration.	0.4
2019.02.06	Perez 1	LTF	Reviewed and redlined opposition to motion to exclude Snyder and discussed it with Yeremey Krivoshey (2.4); trial team meeting to discuss upcoming deadlines and assignments (.4).	2.8

2019.02.06	Perez 1	YOK	Reviewed email from McMillion and called her re same and emailed defendant re settlement checks (.3), trial team meeting (.4), continued working on Daubert oppositions and discussed same with LTF (7.9).	8.6
2019.02.07	Perez 1	BER	Assist w/ Daubert and citations.	0.3
2019.02.07	Perez 1	BER	Researched case law for Dauberts (3.2); Conf. w/YOK re: same (.1).	3.3
2019.02.07	Perez 1	LTF	Discussed Daubert oppositions and trial strategy with Yeremey Krivoshey and discussed Snyder opposition brief with Blair Reed.	0.4
2019.02.07	Perez 1	YOK	Continued working on Daubert oppositions and discussed same with LTF.	8.4
2019.02.08	Perez 1	DLS	Fixed formatting of declaration.	0.4
2019.02.08	Perez 1	LTF	Discussed motion to strike Colin Weir with Yeremey Krivoshey (.2); worked on Snyder brief, declaration and exhibits (1.8); discussed various trial related issues with Mr. Krivoshey and staff (.6).	2.6
2019.02.08	Perez 1	YOK	Revised pretrial statement and discussed same with LTF, continued working on daubert oppositions. Reviewed defendant's motions in limine meet and confer letter.	7.8
2019.02.09	Perez 1	LTF	Reviewed and redlined opposition to motion to exclude Snyder and exchanged emails with Yeremey Krivoshey regarding same (1.2); reviewed and redlined Verkhovskaya opposition and exchanged emails with Yeremey Krivoshey regarding same (1); sent message to Debbie Schroeder regarding Daubert oppositions (.1).	2.3
2019.02.09	Perez 1	YOK	Continued working on daubert oppositions and emailed LTF re same.	4.5
2019.02.10	Perez 1	LTF	Exchanged messages with Yeremey Krivoshey regarding oppositions to Daubert motions.	0.1
2019.02.10	Perez 1	YOK	Continued working on Daubert oppositions and messaged LTF re same.	7.2
2019.02.11	Perez 1	BER	Updated Snyder exhibits w/ LTF.	0.3
2019.02.11	Perez 1	BER	Reviewed Daubert oppositions.	0.7
2019.02.11	Perez 1	BER	Circulateed YOK declaration to Dauberts (.2); Conf. w/ MCS re: same (.2).	0.4
2019.02.11	Perez 1	BER	Conf. w/ YOK, LTF, DLS re: Dauberts.	0.1
2019.02.11	Perez 1	BER	Assisted w/Pretrial binder.	0.7
2019.02.11	Perez 1	BER	Reviewed Daubert oppositions.	1.9
2019.02.11	Perez 1	BER	Drafted proposed orders for Dauberts.	1.8
2019.02.11	Perez 1	DLS	Attended trial meeting.	0.3
2019.02.11	Perez 1	DLS	Prepared draft prop order; reviewed and made corrections.	0.9
2019.02.11	Perez 1	DLS	Reviewed and prepared tables to Snyder docs.	0.6
2019.02.11	Perez 1	DLS	Reviewed and prepared tables to Verkhoskaya docs.	2.7
2019.02.11	Perez 1	LTF	Worked on Daubert oppositions, supporting declarations and proposed orders and discussed same with Yeremey Krivoshey, Blair Reed and Debbie Schroeder and assisted with filings.	8.8
2019.02.11	Perez 1	MCS	Finalized Krivoshey Declaration ISO Daubert Opps, sent to Debbie, assisted with filing Daubert opps.	3.2

2019.02.11	Perez 1	YOK	Continued working on and finalized daubert oppositions, Krivoshey declarations, and proposed orders. Multiple discussions with LTF, BER, and Debbie Schroeder re same.	9.2
2019.02.12	Perez 1	BER	Meeting w/ YOK, LTF, and DLS.	0.5
2019.02.12	Perez 1	BER	Research depo video use.	0.4
2019.02.12	Perez 1	BER	Email YOK re: video depositions.	0.2
2019.02.12	Perez 1	DLS	Assisted Molly w/ chamber copies.	0.2
2019.02.12	Perez 1	DLS	Prepared MIL drafts.	1.4
2019.02.12	Perez 1	DLS	Attended trial meeting.	0.5
2019.02.12	Perez 1	DLS	Drafted jury instructions.	0.6
2019.02.12	Perez 1	LTF	Team meeting to discuss pre-trial conference statement, trial readiness binder and decertification motion (.5); discussed pre-trial conference statement and next steps with Yeremey Krivoshey and Blair Reed (.2); drafted jury instructions and verdict form and discussed both with Yeremey Krivoshey (4.2).	4.9
2019.02.12	Perez 1	MCS	Sent chambers copies of Daubert Opps.	0.8
2019.02.12	Perez 1	YOK	Trial team meeting to discuss scheduling, discussions with LTF and BR re joint statement, redlined joint statement, worked on verdict form with LTF and reviewed jury instructions.	2.5
2019.02.13	Perez 1	DLS	Continued to work on MILs.	0.9
2019.02.13	Perez 1	DLS	Prepared MIL declaration and proposed order drafts.	0.9
2019.02.13	Perez 1	LTF	Discussed pre-trial conference statement with Yeremey Krivoshey and exchanged emails with him regarding MILs.	0.2
2019.02.13	Perez 1	YOK	Drafted email response to Defendant's meet and confer letter re MILs and discussed same with LTF, redlined and finalized joint statement and emailed it to Defendant.	1.8
2019.02.14	Perez 1	BER	Drafted MIL declaration.	0.9
2019.02.14	Perez 1	BER	Drafted proposed order for MIL.	1.2
2019.02.14	Perez 1	LTF	Discussed MILs with Yeremey Krivoshey, reviewed defendant's letter regarding same and made minor changes to MIL No. 7.	0.6
2019.02.14	Perez 1	YOK	Discussion with TAR re plaintiff issue, worked on finalizing MILs and discussed same with LTF.	1
2019.02.15	Perez 1	BER	Drafted MIL declaration w/exhibits.	1.5
2019.02.15	Perez 1	BER	Reviewed trial binder materials and checklist.	0.8
2019.02.15	Perez 1	BER	Reviewed MILs (1.8); Conf. w/YOK re: same (.1).	1.9
2019.02.15	Perez 1	BER	Filed MILS w/YOK, LTF and DLS.	0.5
2019.02.15	Perez 1	BER	Reviewed LTF and YOK redlines for MILs and supporting materials.	0.3
2019.02.15	Perez 1	DLS	Assisted with MILs; Reviewed , finalized and filed joint statement.	0.7
2019.02.15	Perez 1	JLH	Stitched Rash Curtis Docs together.	0.2
2019.02.15	Perez 1	LTF	Discussed pre-trial conference statement and call with defendant's counsel with Yeremey Krivoshey and reviewed Mr. Krivoshey's edits to the jury instructions.	0.4

2019.02.15	Perez 1	MCS	Put together MIL exhibits, assisted with editing and finalizing MILs.	1.5
2019.02.15	Perez 1	YOK	Worked on jury instructions and discussed same with LTF, call with defense counsel re joint statement and redlined and circulated joint statement, finalized and filed joint statement, finalized and filed MILs and worked on Krivoshey declaration and proposed orders re MILs with BER and LTF.	7.4
2019.02.17	Perez 1	YOK	Drafted supplemental Krivoshey declaration and emailed LTF, BER, and Debbie Schroeder re same.	2.2
2019.02.18	Perez 1	BER	Conf. w/ LTF and YOK re: MIL Declaration supplement.	0.4
2019.02.18	Perez 1	BER	Conf. w/ YOK re: Supplemental declaration.	0.2
2019.02.18	Perez 1	BER	Prepared exhibits for supplemental declaration.	1
2019.02.18	Perez 1	BER	Reviewed supplemental declaration.	0.8
2019.02.18	Perez 1	BER	Reviewed changes to trial binder materials.	0.6
2019.02.18	Perez 1	LTF	Drafted statement of the case and proposed order on trial stipulations and discussed same with Blair Reed (.6); reviewed draft juror questionnaire and witness list and exchanged emails with Ms. Reed and Yeremey Krivoshey regarding same (.5); email exchange with Mr. Krivoshey regarding class notice (.2).	1.3
2019.02.18	Perez 1	YOK	Emails with BER and LTF re notice issue, reviewed witness list and juror questionnaire and discussed supplemental Krivoshey declaration and motion to seal with BER.	0.6
2019.02.19	Perez 1	BER	Drafted trial binder materials.	0.4
2019.02.19	Perez 1	BER	Drafted motion to file under seal (1.4); Conf. w/YOK re: same (.2).	1.6
2019.02.19	Perez 1	BER	Conf. w/DLS re: Motion to file under seal.	0.3
2019.02.19	Perez 1	DLS	Prepared supplemental dec under seal for filing; finalized and filed.	0.9
2019.02.19	Perez 1	LTF	Discussed pre-trial documents with Yeremey Krivoshey and reviewed emails regarding filing of supplemental declaration.	0.2
2019.02.19	Perez 1	MCS	Compiled exhibits.	0.7
2019.02.19	Perez 1	YOK	Emailed defendant re mcmillion/adekoya settlement, emailed defendant re exchange of trial binder documents, reviewed supplemental Krivoshey declaration and sealing motion and proposed order and discussed same with BER and Debbie Schroeder.	1.2
2019.02.20	Perez 1	BER	Drafted Joint exhibit list.	0.8
2019.02.20	Perez 1	BER	Trial team meeting w/LTF, YOK, and DLS.	0.6
2019.02.20	Perez 1	BER	Email w/YOK and LTF re: Exhibit list.	0.2
2019.02.20	Perez 1	DLS	Attended trial meeting.	0.6
2019.02.20	Perez 1	LTF	Team meeting regarding next steps (.6); discussed jury instructions with Yeremey Krivoshey, reviewed his revisions, made additional revisions and circulated final version (.5); reviewed edits to witness list and discussed them with Mr. Krivoshey (.2).	1.3
2019.02.20	Perez 1	MCS	Chambers copies.	0.2
2019.02.20	Perez 1	YOK	Worked on witness list, worked on jury instruction, trial team meeting to discuss trial binder.	2.1

2019.02.20	Perez 1	RSR	Deposited checks into trust account and prepared settlement payments for S. McMillion and J. Adekoya (.3).	0.3
2019.02.21	Perez 1	BER	Reviewed materials for trial.	0.8
2019.02.21	Perez 1	LTF	Discussed joint pre-trial binder documents with Blair Reed.	0.1
2019.02.22	Perez 1	LTF	Worked on joint trial readiness documents and arranged for them to be served on defendant's counsel and discussed same with Blair Reed.	2.3
2019.02.25	Perez 1	BER	Trial team meeting w/LTF, YOK, and DLS.	1.2
2019.02.25	Perez 1	BER	Conf. w/LTF re: Trial Binder.	0.1
2019.02.25	Perez 1	BER	Research statutory damages instructions.	1.4
2019.02.25	Perez 1	LTF	Reviewed defendant's materials for trial binder and discussed them with Yeremey Krivoshey and Blair Reed.	1.9
2019.02.25	Perez 1	YOK	Call with BER and LTF re defendant's trial binder materials and reviewed same. Emailed defendant's counsel re deposition designations and new exhibits and newly disclosed experts.	2.2
2019.02.26	Perez 1	BER	Researched statutory damages instructions.	1.7
2019.02.26	Perez 1	BER	Reviewed Defendant's pattern jury instructions.	1.8
2019.02.26	Perez 1	LTF	Discussed trial issues with Yeremey Krivoshey and exchanged emails with defendant's counsel regarding trial readiness binder.	0.3
2019.02.26	Perez 1	YOK	Discussed trial strategy with LTF.	0.3
2019.02.27	Perez 1	BER	Drafted email re: statutory damages to YOK.	0.2
2019.02.27	Perez 1	BER	Conf. w/DLS re: Trial binder.	0.4
2019.02.27	Perez 1	BER	Reviewed Defendant's trial binder materials.	2.2
2019.02.27	Perez 1	BER	Reviewed Judge Gonzalez Rogers pretrial standing order to comply with formatting.	0.6
2019.02.27	Perez 1	LTF	Worked on objections to deposition designations and discussed objections to defendant's exhibits with Yeremey Krivoshey.	0.5
2019.02.27	Perez 1	MCS	Sent Daubert reply documents to YOK.	0.1
2019.02.27	Perez 1	YOK	Worked on objections to Defendant's trial exhibits and discussed same with LTF.	0.5
2019.02.28	Perez 1	BER	Met w/YOK and LTF re: Jury instructions.	0.5
2019.02.28	Perez 1	BER	Researched damages instructions.	0.4
2019.02.28	Perez 1	BER	Conf. w/LTF re: Trial Binder.	0.1
2019.02.28	Perez 1	BER	Trial team meeting w/LTF, YOK, and DLS.	1.2
2019.02.28	Perez 1	BER	Drafted joint jury trial instructions.	2.8
2019.02.28	Perez 1	BER	Researched adequacy of plaintiff case law (.5); Conf. w/LTF re: same (.1).	0.6
2019.02.28	Perez 1	DLS	Attended trial meeting.	0.4
2019.02.28	Perez 1	LTF	Team meeting to discuss trial readiness binder issues (x2) (1.2); worked on arguments for jury instructions and discussed same with Blair Reed and Yeremey Krivoshey (1.7); reviewed Yeremey Krivoshey's sections on jury instructions (.2); discussed case status with Yeremey Krivoshey (.2).	3.3

2019.02.28	Perez 1	MCS	Drafted and edited TOC for SAB Daubert Book.	1
2019.02.28	Perez 1	YOK	Worked on jury instructions arguments, reviewed LTF's inserts re same, trial team meetings to discuss trial binder filings and inserts, discussion re trial strategy with LTF.	4.5
2019.03.01	Perez 1	BER	Reviewed redlines to jury instructions and combine.	1.2
2019.03.01	Perez 1	BER	Reviewed redlines to trial binder.	1.3
2019.03.01	Perez 1	BER	Conf. w/LTF and YOK re: Trial binder materials.	0.2
2019.03.01	Perez 1	BER	Conf. w/DLS re: Trial binder.	0.3
2019.03.01	Perez 1	DLS	Worked on trial binder documents.	2.5
2019.03.01	Perez 1	DLS	Prepared and filed stipulation of dismissal of McMillion and Adekoya.	0.7
2019.03.01	Perez 1	LTF	Worked on jury instructions and other trial binder documents, discussed them with Yeremey Krivoshey, Blair Reed and Debbie Schroeder (2.7); revised dismissal for Adekoya and McMillion and exchanged emails with Yeremey Krivoshey regarding same (.4).	3.1
2019.03.01	Perez 1	MCS	Discussed Joint Exhibit List with DLS (.3), combined joint exhibit list and fixed format (1.2), discussed depo designations with DLS (.3), finalized Daubert book TOC and put together book (1.2), prepared Fed Ex package to send to SAB (.2).	3.2
2019.03.01	Perez 1	MCS	Finished depo designations, sent back to DLS.	0.6
2019.03.01	Perez 1	YOK	Reviewed stipulation of dismissal re McMillion and Adekoya, worked on trial binder documents and multiple discussions with BER, LTF, and Debbie Schroeder re same.	7.3
2019.03.04	Perez 1	BER	Reviewed Defendant's redlines to trial binder.	1.1
2019.03.04	Perez 1	BER	Reviewed Defendant's redlines to jury instructions.	0.6
2019.03.04	Perez 1	BER	Conf. w/LTF and YOK re: jury instructions.	0.2
2019.03.04	Perez 1	BER	Combined jury instructions for trial binder.	1.9
2019.03.04	Perez 1	BER	Assisted w/reviewing trial binder materials for filing.	1.8
2019.03.04	Perez 1	DLS	Worked with Molly re binder; set up courier.	0.7
2019.03.04	Perez 1	DLS	Made edits, finalized and filed MIL opposition.	0.7
2019.03.04	Perez 1	DLS	Finalized and filed trial docs; emailed Judge.	3
2019.03.04	Perez 1	LTF	Assisted with finalizing and filing trial binder documents and discussed them with Yeremey Krivoshey, Molly Sasseen, Debbie Schroeder and Blair Reed.	3.3
2019.03.04	Perez 1	MCS	Created binder cover sheet (.3), drafted binder table of contents (.8), edited TOC (.2), printed expert reports and 3-hole punch (.8), Edited witness lists (.6), assisted with filing trial readiness docs (.8) , printed all trial readiness docs and placed in binder (3.3).	6.8
2019.03.04	Perez 1	YOK	Drafted objection to Defendant's daubert reply brief, drafted MIL opposition, assisted with finalizing and filing trial binder documents and discussions re same with LTF, BER, Debbie Schroeder, and Molly Sasseen. Call with defendant's counsel re trial binder filings.	7.9
2019.03.05	Perez 1	BER	Reviewed administrative motion re: Notice Plan.	0.6
2019.03.05	Perez 1	DLS	Prepared list and completed binder.	0.5

2019.03.05	Perez 1	DLS	Reviewed motion; made edits; finalized and filed.	0.6
2019.03.05	Perez 1	LTF	Discussed notice administrative motion with Yeremey Krivoshey, reviewed emails regarding same and reviewed draft of motion and supporting declaration.	0.3
2019.03.05	Perez 1	YOK	Drafted administrative motion re notice plan, Krivoshey declaration, and proposed order. Emailed defendant re same. Discussed same with LTF.	3.8
2019.03.06	Perez 1	LTF	Discussed Daubert hearing with Yeremey Krivoshey and exchanged emails with Mr. Krivoshey and Scott Bursor regarding meeting prior to hearing and discussed same with Blair Reed.	0.4
2019.03.06	Perez 1	MCS	Sent admin motion chambers copies.	0.5
2019.03.06	Perez 1	YOK	Researched re decertification issues and discussed Daubert hearing with LTF.	1.3
2019.03.07	Perez 1	LTF	Discussed decertification motion and reviewed hearing schedule with Debbie Schroeder.	0.2
2019.03.08	Perez 1	LTF	Reviewed opposition to administrative motion and discussed it with Yeremey Krivoshey.	0.3
2019.03.08	Perez 1	YOK	Reviewed Defendant's opposition to administrative motion re notice and discussed same with LTF.	0.3
2019.03.11	Perez 1	LTF	Discussed trial schedule and related issues with Colin Weir and Yeremey Krivoshey.	0.2
2019.03.12	Perez 1	MCS	Drafted TOC for Daubert hearing book, printed docs and made book for YOK.	3.2
2019.03.14	Perez 1	BER	Conf. w/LTF and DLS re: Admin Motion Opp.	0.1
2019.03.14	Perez 1	BER	Reviewed Admin Motion Opp.	0.6
2019.03.14	Perez 1	BER	Reviewed briefing and trial binder.	1.1
2019.03.14	Perez 1	BER	Reviewed LTF redlines re: Admin Motion Opp. (.4); and YOK Decl. (.2).	0.6
2019.03.14	Perez 1	DLS	Reviewed and filed opposition.	0.5
2019.03.14	Perez 1	LTF	Reviewed administrative motion and discussed it with Yeremey Krivoshey (.4); reviewed opposition to administrative motion and Krivoshey declaration and discussed it with Mr. Krivoshey, Blair Reed and Debbie Schroeder (.8).	1.2
2019.03.14	Perez 1	YOK	Drafted opposition to Defendant's administrative motion for leave to file motion for decertification and Krivoshey declaration, discussed same with LTF, and reviewed LTF's edits to same.	6.4
2019.03.15	Perez 1	MCS	Sent chambers copies.	0.5
2019.03.17	Perez 1	SAB	Prep for Daubert hearing.	1.3
2019.03.18	Perez 1	BER	Reviewed Daubert briefs for hearing (.6); Conf. w/YOK re: same (.2).	0.8
2019.03.18	Perez 1	BER	Meeting w/YOK, LTF, and SAB re: Trial preparation.	2
2019.03.18	Perez 1	DLS	Assisted with binders.	3.5
2019.03.18	Perez 1	LTF	Discussed Daubert hearing with Yeremey Krivoshey, reviewed email from Court and prepared for pre-trial conference and MIL arguments (4.6); traveled to S.F. with Mr. Krivoshey and Blair Reed to meet Scott Bursor to prep for hearing (3.2).	7.8
2019.03.18	Perez 1	MCS	Drafted TOC of daubert declarations/exhibits and sent to YOK for approval, prepared hearing books for SAB, LTF, and YOK; Drafted TOC for MIL binder and started printing docs.	6.5

2019.03.18	Perez 1	SAB	Traveled MIA to SF, prep for hearing en route (6.5); Conf. w/ T. Fisher, Y. Krivoshey & B. Reed re hearing prep (2.0); analyzed MIL briefs and trial readiness binder (3.5).	12
2019.03.18	Perez 1	YOK	Prepped for Daubert hearing and discussed same with LTF. Met with Scott Bursor, LTF, and BER in SF to prep for hearing.	11.1
2019.03.19	Perez 1	BER	Trial prep meeting w/LTF, DLS, YOK, and SAB.	3.8
2019.03.19	Perez 1	BER	Travel to and attend hearing w/LTF, YOK, and SAB.	5.2
2019.03.19	Perez 1	DLS	Attended meeting.	0.9
2019.03.19	Perez 1	LTF	Prepared for hearing, traveled to Oakland for hearing, attended hearing and handled pre-trial matters, returned to Walnut Creek following hearing and attended trial team meeting with Scott Bursor, Yeremey Krivoshey and Blair Reed.	8.9
2019.03.19	Perez 1	MCS	Finished putting together MIL binders for YGR, finished preparing books for hearing, printed condensed depo transcripts for SAB.	3.5
2019.03.19	Perez 1	SAB	Prep for and attend Daubert hearing (4.3); trial team meeting after hearing (6.4).	10.7
2019.03.19	Perez 1	YOK	Prepared for Daubert hearing, met with LTF, SAB, and BER prior to hearing, argued at hearing, traveled back to Walnut Creek after hearing, trial team meeting after hearing to prep for trial. Emailed clerk re conference room reservation.	11.3
2019.03.20	Perez 1	BER	Conf. w/DLS re: Exhibits (.2); Conf. w/DLS re: Trial preparation (.4).	0.6
2019.03.20	Perez 1	DLS	Prepared exhibit tag and added to docs.	5
2019.03.20	Perez 1	DLS	Filed transcript request.	0.2
2019.03.20	Perez 1	LTF	Discussed trial issues with Yeremey Krivoshey, Blair Reed, Debbie Schroeder and Molly Sasseen.	0.8
2019.03.20	Perez 1	MCS	Sent hearing book to SAB, figured out trial exhibit tags (cropping, coloring, and sizing), made excel hot docs into PDFs, tagged all hot doc PDFs, prepared transcript order.	3.5
2019.03.20	Perez 1	SAB	Travel SF to MIA, revised deposition designations en route (5.5); teleconf. w/ Y. Krivoshey re revisions to electronic exhibits and deposition designations (.3); reviewed revised exhibits (1.3); revised deposition designations (2.3).	9.4
2019.03.20	Perez 1	YOK	Call and email with KCC re notice, calls with Colin Weir re trial exhibits (x2), call with Verkhovskaya re trial and notice, call with Perez, worked on trial exhibits and deposition designations, discussions with Molly Sasseen and Debbie Schroeder re trial exhibits.	7.4
2019.03.21	Perez 1	BER	Meeting w/YOK and LTF.	0.5
2019.03.21	Perez 1	DLS	Assisted with deposition designation.	2
2019.03.21	Perez 1	DLS	Prepared check for transcript.	0.3
2019.03.21	Perez 1	DLS	Assisted with deposition video trimming.	0.7
2019.03.21	Perez 1	DLS	Discussed correction needed on deposition w/ Veritext.	0.8
2019.03.21	Perez 1	DLS	Attended team meeting.	0.6
2019.03.21	Perez 1	LTF	Team meeting to discuss next trial projects and discussed deposition designations and videos with Yeremey Krivoshey, Blair Reed, Debbie Schroeder and Molly Sasseen (.9); reviewed Kizer video with Mr. Krivoshey and discussed same (.4); discussed Correa deposition video with Mr. Krivoshey (.1).	1.4



2019.03.21	Perez 1	MCS	Tagged all remaining exhibits (2.7), marked deposition designations (2.8).	5.5
			Discussed trial issues with LTF, BER, Debbie Schroeder and Molly Sasseen, cut Correa, Kizer, and Nick Keith deposition videos and discussed same with LTF and sent videos to trial team, email with SAB re deposition designations, discussed deposition designations and worked on same with Molly Sasseen and Debbie Schroeder. Emailed defendant re conference room issue and reviewed email from clerk re same. Multiple emails with KCC re notice plan, reviewed cost estimate for notice plan, and signed and approved proposed notice plan.	8.1
2019.03.21	Perez 1	YOK		
2019.03.21	Perez 1	RSR	Conf. w/ DLS re depo video cutting (.2).	0.2
2019.03.22	Perez 1	DLS	Email exchange with Veritext.	0.2
			Discussed deposition videos and other issues with Yeremey Krivoshey (.4); reviewed transcript from 3/19 hearing (.2); reviewed emails regarding various trial issues (.2).	0.8
2019.03.22	Perez 1	LTF		
2019.03.22	Perez 1	SAB	Prep for pretrial conference and trial prep.	5.2
			Emails with SAB re revised deposition designations, recut Correa video. Analyzed transcript from Daubert hearing. Emailed SAB re proposed schedule to exchange exhibits with defendant and providing them to the Court and emailed defendant re same. Emailed defendant re payment of costs for depositions. Analyzed plaintiff's trial exhibits and MILs and strategized re trial and pretrial conference. Emails with KCC re notice plan issues.	5.7
2019.03.22	Perez 1	YOK		
2019.03.23	Perez 1	SAB	Analyzed Daubert hearing transcript (.8); revised deposition designations (1.8).	2.6
2019.03.25	Perez 1	DLS	Email exchange with Veritext.	0.2
2019.03.25	Perez 1	MCS	Updated Correa and Kizer marked depo transcripts, sent to SAB and trial team.	3.2
			Emailed clerk re conference room, recut Kizer video, reviewed corrected Correa deposition transcript, went over all of Plaintiff's trial exhibits and sent email to trial team re possible exhibits to drop.	6.6
2019.03.25	Perez 1	YOK		
2019.03.26	Perez 1	DLS	Assisted w/ trial exhibits.	1
			Discussed various trial preparation issues with Scott Bursor, Yeremey Krivoshey and Debbie Schroeder.	1.3
2019.03.26	Perez 1	LTF		
2019.03.26	Perez 1	SAB	Videoconf w/ T. Fisher re prep for upcoming pretrial conference (.4); videoconf. w/ Y. Krivoshey re trial exhibits (1.5); reviewed all trial exhibits (3.3)	5.2
			Call with SAB re exhibits and trial issues and discussed same with LTF and Debbie Schroeder, finalized list of possible trial exhibits to drop, emailed defendant re same, met and conferred with defendant re trial exhibits via email.	4.7
2019.03.26	Perez 1	YOK		
2019.03.27	Perez 1	DLS	Made edits to exhibit list and coordinated delivery of trial exhibits.	1.5
2019.03.27	Perez 1	DLS	Finalized and filed joint set of exhibits (Revised).	0.6
2019.03.27	Perez 1	DLS	Worked with Quivx to prepare SAB books of exhibits.	0.5
			Discussed pre-trial conference with Scott Bursor, Yeremey Krivoshey and Debbie Schroeder and prepared for conference.	1.9
2019.03.27	Perez 1	LTF		

2019.03.27	Perez 1	MCS	Reviewed trial exhibits from QuivX with DLS (.2), formatted and printed new binder spine sheet for vol. 2 (.6), assisted DLS with formatting of new exhibit sheet (.9), printed new exhibit sheets for binders (.3), discussed redlining of transcripts and began creating redlined list of depo designations (1.5).	3.5
2019.03.27	Perez 1	SAB	Analyzed MIL briefs and exhibits, and prep for upcoming pretrial hearing (5.1); videoconf. w/ T. Fisher & Y. Krivoshey re same (.7).	5.8
2019.03.27	Perez 1	YOK	Email correspondence with defendant re trial exhibits list, reviewed and finalized amended joint trial exhibit list, discussed trial exhibits and delivery of same with Debbie Schroeder and Molly Sasseen, discussed pretrial conference with LTF and SAB and prepped for same.	5.2
2019.03.28	Perez 1	DLS	Worked with Molly re books for SAB.	0.2
2019.03.28	Perez 1	LTF	Meeting to prepare for pre-trial conference with Scott Bursor and Yeremey Krivoshey.	1.8
2019.03.28	Perez 1	MCS	Drafted TOC and prepared book of important docs for SAB (2.6), finished list and redline depo designations (3.4).	6
2019.03.28	Perez 1	SAB	Travel MIA to SFO, and prep for pretrial hearing en route (7.5); conf. w/ T. Fisher & Y. Krivoshey re trial prep and prep for pretrial hearing (2.3).	9.8
2019.03.28	Perez 1	YOK	Reviewed defendant's trial exhibits and prepped for pretrial conference. Met with LTF and SAB re pretrial conference.	4.6
2019.03.29	Perez 1	LTF	Attended pre-trial conference and met with Scott Bursor and Yeremey Krivoshey following conference to discuss trial strategy.	9
2019.03.29	Perez 1	SAB	Prep for and attend pretrial conference (5.5); debrief with trial team (2.5).	8
2019.03.29	Perez 1	YOK	Prepared for pretrial conference, met with LTF and SAB prior to pretrial conference, participated in conference, met with LTF and SAB after conference to prep for trial.	9.6
2019.04.01	Perez 1	DLS	Spoke to Frances re Court Reporter.	0.1
2019.04.01	Perez 1	DLS	Finalized and filed transcript order; prepared check to Court Reporter.	0.4
2019.04.01	Perez 1	LTF	Call with Yeremey Krivoshey regarding supplemental brief and Ellis declaration and reviewed emails regarding same and reviewed draft brief.	0.8
2019.04.01	Perez 1	MCS	Transcript Order form (.5), prepared and sent pretrial books to SAB (.6), sent check to court reporter (.1).	1.2
2019.04.01	Perez 1	YOK	Discussed scheduling issues and pretrial conference with Debbie Schroeder and BER, reviewed Mark Ellis declaration and worked on opposition/response to Ellis declaration and call with LTF re same and emails with LTF/SAB re same.	6.4
2019.04.02	Perez 1	DLS	Prepared and filed transcript request.	0.6
2019.04.02	Perez 1	LTF	Reviewed order regarding response to supplemental brief and discussed it with Yeremey Krivoshey and reviewed draft brief prepared by Mr. Krivoshey.	0.5
2019.04.02	Perez 1	MCS	Finalized versions of objection to Ellis Declaration, sent back to YOK (.5), sent check to court reporter for 2016 transcript (.1).	0.6
2019.04.02	Perez 1	SAB	Analyzed affidavit of Mark Ellis (1.4).	1.4

2019.04.02	Perez 1	YOK	Worked on objection to 4/1/2019 Ellis declaration and call with SAB re same, discussed transcript issue with Debbie Schroeder, reviewed order re response to Ellis declaration, discussed same with LTF. Worked on Perez direct book for SAB.	8.3
2019.04.03	Perez 1	DLS	Followed up with transcript.	0.1
2019.04.03	Perez 1	DLS	Called Court re Order.	0.2
2019.04.03	Perez 1	DLS	Reviewed Order and calendared dates.	0.5
2019.04.03	Perez 1	DLS	Sent email to Veritext re Certified transcripts.	0.1
2019.04.03	Perez 1	LTF	Reviewed revised draft of supplemental response and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2019.04.03	Perez 1	MCS	Assisted with finalizing and filing supplemental brief, sent chambers copy to YGR.	1.5
2019.04.03	Perez 1	SAB	Revised draft objections to declaration of Mark Ellis (2.3); teleconf. w/ Y. Krivoshey re same (.5).	2.8
2019.04.03	Perez 1	YOK	Rewrote response re 4/1/2019 Ellis declaration and emails with LTF and SAB re same (2.0). Discussed same with SAB (.5). Continued working on Perez direct book (4.7).	7.2
2019.04.04	Perez 1	BER	Reviewed order.	0.8
2019.04.04	Perez 1	DLS	Filed response.	0.3
2019.04.04	Perez 1	DLS	Called Court Reporter Coordinator re trial.	0.2
2019.04.04	Perez 1	DLS	Followed up with Veritext re original transcripts.	0.2
2019.04.04	Perez 1	LTF	Reviewed order on MILs and jury instructions and exchanged emails with Yeremey Krivoshey regarding same.	0.5
2019.04.04	Perez 1	MCS	Put together Krivoshey declaration exhibits, assisted with finalizing and filing reply to Ellis Declaration, sent chambers copies.	1.7
2019.04.04	Perez 1	YOK	Reviewed SAB's redline to response to 4/1/2019 Ellis declaration, finalized response, finalized Krivoshey declaration. Reviewed Pretrial Order No. 2 and email with LTF re same.	2.2
2019.04.05	Perez 1	BER	Reviewed trial materials.	1.1
2019.04.05	Perez 1	DLS	Call with ECF desk re Scott.	0.2
2019.04.05	Perez 1	YOK	Reviewed order re trial stipulations.	0.1
2019.04.08	Perez 1	BER	Reviewed trial materials.	1.2
2019.04.08	Perez 1	LTF	Discussed witness books with Yeremey Krivoshey and Scott Bursor.	0.2
2019.04.08	Perez 1	YOK	Worked on Perez direct book and discussed same with LTF.	1.5
2019.04.09	Perez 1	BER	Reviewed trial materials.	1.3
2019.04.09	Perez 1	YOK	Emails with defense counsel re trial exhibit 75.	0.1
2019.04.10	Perez 1	BER	Conf. w/YOK re: Witness outlines.	0.2
2019.04.10	Perez 1	DLS	Met with LTF and YOK re trial.	0.4
2019.04.10	Perez 1	DLS	Prepared check for court reporter.	0.2
2019.04.10	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey and Debbie Schroeder.	0.2
2019.04.10	Perez 1	YOK	Discussed trial issues with LTF, BER, and Debbie Schroeder.	0.4

2019.04.11	Perez 1	YOK	Worked on and circulated Perez direct book.	8.8
2019.04.12	Perez 1	BER	Trial team meeting.	0.9
2019.04.12	Perez 1	LTF	Trial team meeting.	0.9
2019.04.12	Perez 1	YOK	Edited Perez book (1.6). Trial team meeting (.9). Worked on Snyder direct book (5.4).	7.9
2019.04.15	Perez 1	LTF	Discussed next steps with Yeremey Krivoshey and exchanged message with Mr. Krivoshey regarding Oregon TCPA jury verdict and MIL order in that case regarding treble damages issue (.5); exchanged messages with Yeremey Krivoshey regarding Plaintiff Perez and next meeting with him (.2).	0.7
2019.04.15	Perez 1	YOK	Call with Colin Weir re prep, continued working on Snyder direct book, reviewed orders and filings re treble damages and verdict form in Oregon TCPA case and discussed same with LTF, lengthy call with Plaintiff Perez and messaged LTF re same.	8.8
2019.04.16	Perez 1	BER	Review materials for trial.	0.9
2019.04.16	Perez 1	DLS	Prepared transcript request and filed.	0.4
2019.04.16	Perez 1	LTF	Research regarding Oregon TCPA verdict.	0.6
2019.04.16	Perez 1	YOK	Continued working on Snyder direct book. Emailed defendant re expert costs.	7.2
2019.04.17	Perez 1	BER	Conf. w/DLS re: Jury chart.	0.1
2019.04.17	Perez 1	DLS	Worked on Juror Chart.	0.4
2019.04.17	Perez 1	DLS	Worked on Witness Videos.	1
2019.04.17	Perez 1	MCS	Created draft of jury table, sent to Debbie for review.	0.8
2019.04.17	Perez 1	YOK	Discussed video issue with Debbie Schroeder. Continued working on Snyder direct book.	7
2019.04.18	Perez 1	BER	Trial team meeting.	0.7
2019.04.18	Perez 1	DLS	Call with car service re Perez transportation.	0.6
2019.04.18	Perez 1	DLS	Team meeting.	0.7
2019.04.18	Perez 1	LTF	Trial team meeting.	0.7
2019.04.18	Perez 1	MCS	Finalized jury chart, adapted to 11x17 paper.	0.8
2019.04.18	Perez 1	YOK	Discussed Perez travel for trial with Debbie Schroeder. Participated in trial team meeting. Emailed defendant re expert cost issue. Continued working on Snyder direct book.	6.7
2019.04.19	Perez 1	YOK	Continued working on Snyder direct book.	5.6
2019.04.21	Perez 1	LTF	Reviewed Snyder witness outline and email from Yeremey Krivoshey regarding same.	0.4
2019.04.21	Perez 1	YOK	Finished draft of Snyder direct book and emailed trial team re same.	3.1
2019.04.22	Perez 1	BER	Reviewed MIL order (.4); Conf. w/LTF re: same (.1).	0.5
2019.04.22	Perez 1	BER	Reviewed direct outlines.	1.3
2019.04.22	Perez 1	DLS	Prepared index for original depo transcripts.	0.7
2019.04.22	Perez 1	LTF	Reviewed MIL order and discussed 4/29 hearing agenda and witness outlines with Yeremey Krivoshey.	0.5
2019.04.22	Perez 1	SAB	Trial prep.	1.5

2019.04.22	Perez 1	YOK	Reviewed Pretrial Order No. 3 and emailed SAB re same. Worked on Weir direct book and discussed same with LTF.	5.9
2019.04.22	Perez 1	RSR	Booked SAB hotel (.4).	0.4
2019.04.23	Perez 1	DLS	Worked on trial videos.	4
2019.04.23	Perez 1	LTF	Reviewed 4/29 hearing agenda and exchanged emails with Yeremey Krivoshey regarding same and discussed it with him briefly.	0.2
2019.04.23	Perez 1	YOK	Drafted joint pretrial conference statement, discussed same with LTF, and continued working on Weir direct book for SAB.	7.2
2019.04.24	Perez 1	BER	Conf. w/ YOK.	0.1
2019.04.24	Perez 1	BER	Updated exhibit list and reviewed 3/29 transcript.	0.6
2019.04.24	Perez 1	DLS	Worked w/ Veritext re videos.	2.3
2019.04.24	Perez 1	LTF	Discussed 4/29 hearing agenda with Yeremey Krivoshey.	0.3
2019.04.24	Perez 1	YOK	Email with KCC re costs for notice, worked on joint pretrial conference statement and sent to trial team, discussed pretrial conference hearing with LTF, continued working on Weir direct book.	8
2019.04.25	Perez 1	BER	Drafted order re: Trial equipment.	0.3
2019.04.25	Perez 1	DLS	Scheduled courier.	0.1
2019.04.25	Perez 1	DLS	Call with clerk re index and made edits.	0.7
2019.04.25	Perez 1	DLS	Worked w/ Veritext re videos.	1.5
2019.04.25	Perez 1	DLS	Prepared and filed notice of appearance.	0.5
2019.04.25	Perez 1	LTF	Reviewed emails from Scott Bursor re: 4/29 agenda and reviewed his edits to draft agenda (.3); call with court clerk and arranged for preparation and filing of notice of appearance for Mr. Bursor (.2).	0.5
2019.04.25	Perez 1	YOK	Finalized joint pretrial conference statement and emailed defendant re same. Updated amended trial list and emailed defendant re same. Call with SAB re pretrial statement. Continued working on Weir direct book.	8.8
2019.04.26	Perez 1	BER	Conf. w/YOK re: Trial equipment order (.2); Updated order and draft email re: same (.3).	0.5
2019.04.26	Perez 1	BER	Conf. w/LTF re: Trial.	0.1
2019.04.26	Perez 1	DLS	Fixed formatting and filed/ assisted with chambers copy.	0.6
2019.04.26	Perez 1	LTF	Trial preparation and discussions with Scott Bursor, Yeremey Krivoshey, Blair Reed and Debbie Schroeder and reviewed jury instructions, verdict form and final 4/29 hearing agenda.	4.2
2019.04.26	Perez 1	SAB	Prep for Monday's pretrial conference including analyzing Judge's draft verdict form and jury instructions, and videoconf. w/ T. Fisher & Y. Krivoshey re same.	7.5

2019.04.26	Perez 1	YOK	Emails with Defendant re amended exhibit list and pretrial conference statement and assisted with filing same. Call with Anthony Valenti re same. Call with LTF and SAB re verdict form and jury instructions and pretrial conference. Call with Veritext re witness videos and discussions with LTF and Debbie Schroeder re same. Reviewed proposed order re equipment for trial and discussed same with BER. Continued working on Weir book and circulated to trial team. Worked on Verkhovskaya direct book.	10.7
2019.04.27	Perez 1	LTF	Email exchange with Scott Bursor regarding notice of appearance and reviewed Verkhovskaya outline.	0.4
2019.04.27	Perez 1	SAB	Prep for pretrial conference.	3.5
2019.04.27	Perez 1	YOK	Finished drafting Verkhovskaya direct book and circulated to trial team.	3
2019.04.28	Perez 1	LTF	Traveled to SF for meeting with Scott Bursor and Yeremey Krivoshey prior to hearing and returned to Walnut Creek afterwards.	4.4
2019.04.28	Perez 1	SAB	Travel Miami to SF, prep for pretrial conference en route (8.0); conf. w/ T. Fisher & Y. Krivoshey re prep for pretrial conference (2.3); developed trial strategy and revised direct examination outlines (3.8).	13.1
2019.04.28	Perez 1	YOK	Traveled to meet with SAB and LTF in SF to prep for pretrial conference.	4.2
2019.04.29	Perez 1	BER	Traveled to and attended pretrial conference w/SAB, LTF, and YOK.	4.3
2019.04.29	Perez 1	BER	Conf. w/DLS re: Order and hearing.	0.4
2019.04.29	Perez 1	BER	Prepare for trial w/SAB, LTF, and YOK.	8
2019.04.29	Perez 1	DLS	Prepared trial book.	1
2019.04.29	Perez 1	DLS	Prepared and filed transcript request.	0.5
2019.04.29	Perez 1	DLS	Met w/ LTF, YOK and BER re trial prep.	1
2019.04.29	Perez 1	LTF	Traveled to Oakland for pretrial conference, attended conference, returned to Walnut Creek afterwards and continued trial preparation.	12.9
2019.04.29	Perez 1	MCS	Printed transcripts and assisted with trial prep as needed, ordered supplies for trial.	1.7
2019.04.29	Perez 1	SAB	Prep for and attend pretrial conference (4.0); trial team meeting, drafting of opening statement slides, and other trial prep at CA Office (7.4).	11.4
2019.04.29	Perez 1	YOK	Traveled to and from, and attended pretrial conference. Trial prep with trial team after pretrial conference.	12.8
2019.04.30	Perez 1	BER	Conf. w/LTF re: Trial.	0.2
2019.04.30	Perez 1	BER	Conf. w/YOK and DLS re: Trial.	0.2
2019.04.30	Perez 1	BER	Prepare for trial.	3.3
2019.04.30	Perez 1	DLS	Prepared new pleading template.	0.6
2019.04.30	Perez 1	DLS	Worked on video excerpts.	2
2019.04.30	Perez 1	LTF	Trial preparations and discussed various trial related issues with Yeremey Krivoshey, Scott Bursor, Blair Reed and Debbie Schroeder.	5.9
2019.04.30	Perez 1	MCS	Started gathering trial supplies (.6), discussed video caption options with Debbie Schroeder (.7), troubleshoot depoview (1.2), put all exhibits from amended exhibit list into one folder (.8), assisted with trial binders (.5).	3.8

2019.04.30	Perez 1	SAB	Travel SFO to FLL, revised draft direct examination outlines for Snyder, Weir & Verkhovskaya en route (7.0); negotiations concerning Jury Instruction 22 (1.5); videoconf. w/ Y. Krivoshey & T. Fisher re trial prep (.8); other trial prep (2.3).	11.6
2019.04.30	Perez 1	YOK	Revised direct books for SAB. Continued trial prep and discussed same with LTF, SAB, and Debbie Schroeder.	9.8
2019.05.01	Perez 1	BER	Meet w/YOK re: Trial prep.	0.1
2019.05.01	Perez 1	BER	Prepared for trial.	6.2
2019.05.01	Perez 1	DLS	Worked on videos, binders and filed jury instruction #32.	8
2019.05.01	Perez 1	EMW	Booked SAB travel for trial (.8).	0.8
2019.05.01	Perez 1	LTF	Trial preparation and conversations with Yeremey Krivoshey, Scott Bursor, Debbie Schroeder and Molly Sasseen.	6.8
2019.05.01	Perez 1	MCS	Checked amended exhibit list and prepped exhibits to send to QuivX, finished jury table and sent to QuivX for printing.	1.5
2019.05.01	Perez 1	SAB	Trial prep.	13.8
2019.05.01	Perez 1	YOK	Calls with SAB and LTF for trial prep. Worked on witness videos and captions. Worked on revised jury instruction with LTF. Research re bench memos. Discussed voir dire with BER and LTF and Debbie Schroeder and Molly Sasseen.	7.2
2019.05.02	Perez 1	BER	Drafted YOK Declaration with exhibits.	1.9
2019.05.02	Perez 1	BER	Conf. w/LTF re: Objections.	0.2
2019.05.02	Perez 1	BER	Meet w/LTF and YOK re: Opening Slides.	0.4
2019.05.02	Perez 1	BER	Draft objection to opening statement.	2.1
2019.05.02	Perez 1	BER	Conf. w/LTF, YOK, and SAB re: Objections.	0.4
2019.05.02	Perez 1	BER	Prepare declaration for filing.	0.3
2019.05.02	Perez 1	BER	Prepare for trial.	2.2
2019.05.02	Perez 1	DLS	Assisted with trial binders and videos.	7.6
2019.05.02	Perez 1	LTF	Trial preparation, drafted portion of objection to defendant's opening statement slides, met with Yeremey Krivoshey, Blair Reed and Scott Bursor regarding slides, drafted objection to defendant's revised verdict form and discussed same with Mr. Bursor and Mr. Krivoshey.	6.4
2019.05.02	Perez 1	MCS	Printed labels for loose exhibit set, ordered trial supplies, put together YOK declaration for opposition to Def's opening slides, assisted with filing opp to opening slides, assisted Debbie with other trial prep as needed.	3.5
2019.05.02	Perez 1	SAB	Trial prep.	12
2019.05.02	Perez 1	YOK	Worked on objection to defendant's opening slides with SAB/LTF/BER and emailed defendant re same. Discussed verdict form issues with LTF/SAB/BER. Continued trial prep.	9.4
2019.05.03	Perez 1	BER	Call w/Judge Gonzalez Rogers.	0.3
2019.05.03	Perez 1	BER	Prepare for trial.	5.8
2019.05.03	Perez 1	DLS	Assisted with trial binders, witness books, reservations for car, videos.	8

2019.05.03	Perez 1	DLS	Coordinated delivery of chamber copies.	0.3
2019.05.03	Perez 1	LTF	Trial preparation and participated in conference call with Judge Gonzalez Rogers.	7.8
2019.05.03	Perez 1	MCS	Organized all loose exhibits into labeled manila folders and placed in redwells, prepared chambers copies for objections to def's opening slides.	4.2
2019.05.03	Perez 1	SAB	Trial prep.	12.2
2019.05.03	Perez 1	YOK	Continued trial prep. Sat in on conference call with Court.	9
2019.05.04	Perez 1	BER	Prepare for trial.	13.7
2019.05.04	Perez 1	DLS	Assisted with trial prep.	10
2019.05.04	Perez 1	LTF	Trial prep and meetings with Scott Bursor, Yeremey Krivoshey, Blair Reed, Debbie Schroeder and Molly Sasseen.	11.6
2019.05.04	Perez 1	MCS	Replaced all exhibit book indexes with amended index, cut post-its to fit jury charts, created exhibit stickers, assisted with screenshots for opening slides, created and tabbed exhibit 56(A), gathered supplies and exhibits in bankers boxes, created book of important orders.	10
2019.05.04	Perez 1	SAB	Travel FLL to SFO, trial prep en route (8.0); trial team meeting and additional trial prep in Walnut Creek office (6.3).	14.3
2019.05.04	Perez 1	YOK	Trial prep.	11.5
2019.05.05	Perez 1	BER	Meeting with R. Snyder.	1.8
2019.05.05	Perez 1	BER	Conf. w/Trial team.	0.4
2019.05.05	Perez 1	BER	Prepare for trial.	1.6
2019.05.05	Perez 1	LTF	Traveled to Sacramento to meet with Plaintiff Perez, returned to Walnut Creek, continued trial preparations and met with expert Randy Snyder and Plaintiff's trial team in San Francisco.	11.2
2019.05.05	Perez 1	SAB	Trial prep.	12.3
2019.05.05	Perez 1	YOK	Trial prep. Met with Plaintiff Perez in Sacramento. Met with Snyder and trial team in San Francisco.	11.3
2019.05.06	Perez 1	BER	Prepared for and attend trial.	16.3
2019.05.06	Perez 1	DLS	Assisted with trial prep.	7
2019.05.06	Perez 1	JDS	Assist with trial.	0.5
2019.05.06	Perez 1	JLH	Drove to Office Depot re printer toner.	1
2019.05.06	Perez 1	LTF	Trial - Day One and prepararation for Day Two.	15.1
2019.05.06	Perez 1	MCS	Trial support - created smaller consolidated 4x2 jury table, started converting transcript excerpts to Word for CSR Skillman, assisted with trial issues.	5.3
2019.05.06	Perez 1	SAB	Trial Day 1: Jury selection, opening statements (5.0); witness prep and trial prep (9.4).	14.4
2019.05.06	Perez 1	YOK	Trial and prep. Email with KCC re notice.	15.4
2019.05.07	Perez 1	BER	Prepared for and attended trial.	15.6
2019.05.07	Perez 1	DLS	Assisted with trial.	7.5
2019.05.07	Perez 1	DLS	Emailed pics to LTF.	0.4



2019.05.07	Perez 1	DLS	Prepared thumbdrive for Diane Skillman.	0.2
2019.05.07	Perez 1	LTF	Trial - Day Two and preparation for day three.	15.7
2019.05.07	Perez 1	MCS	Created thumbnail headshots for N. Keith and Kizer videos; finished transcript excerpts for CSR Skillman, reviewed and edited for typos.	5.7
2019.05.07	Perez 1	SAB	Trial Day 2: Perez, Kizer (video), Correa (video); Nick Keith (video); Colin Weir direct (6.5); witness prep and trial prep (9.0).	15.5
2019.05.07	Perez 1	YOK	Trial and prep.	16.5
2019.05.08	Perez 1	BER	Prepared for and attended trial.	16.1
2019.05.08	Perez 1	DLS	Assisted with trial.	8.5
2019.05.08	Perez 1	LTF	Trial - Day Three and preparation for day four.	15.2
2019.05.08	Perez 1	MCS	Searched for original R. Keith depo transcript, tabbed exhibits 89-91, assisted Debbie with other general trial prep.	3.8
2019.05.08	Perez 1	SAB	Trial Day 3: Weir cross, Verkhovskaya direct (6.5); trial prep all night analyzing the "dirty dozen" purported errors in Verkhovskaya's class list, and prep for cross of defendants' upcoming witnesses (9.3).	15.8
2019.05.08	Perez 1	YOK	Trial and prep.	15.8
2019.05.09	Perez 1	BER	Prepared for and attended trial.	14.2
2019.05.09	Perez 1	DLS	Assisted with trial.	7
2019.05.09	Perez 1	LTF	Trial - Day Four and preparation for day five.	14.9
2019.05.09	Perez 1	MCS	Discussed trial and what is needed for closing argument slides, created snips for powerpoint and import to closing slides.	3.7
2019.05.09	Perez 1	SAB	Trial Day 4: Verkhovskaya cross, Plf rests, Robert Keith, Daniel Correa, Nicholas Keith, Christian Paff (6.5); prep for Kizer cross and closing arguments (8.3).	14.8
2019.05.09	Perez 1	YOK	Trial and prep.	15.2
2019.05.10	Perez 1	BER	Prepared for and attend trial.	8.3
2019.05.10	Perez 1	DLS	Attended trial.	9
2019.05.10	Perez 1	LTF	Trial - Day Five and meeting after closing argument.	8.5
2019.05.10	Perez 1	MCS	Traveled to courthouse, observed court proceedings and closing arguments, traveled back to office.	8.5
2019.05.10	Perez 1	SAB	Trial Day 5: closing arguments, beginning jury deliberations (6.5); prep for Phase 2 of trial to start on Monday (2.8).	9.3
2019.05.10	Perez 1	YOK	Trial and prep.	8.5
2019.05.11	Perez 1	BER	Prepared for trial.	2.1
2019.05.12	Perez 1	LTF	Reviewed damages memo and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2019.05.12	Perez 1	YOK	Trial prep. Drafted brief re statutory damages.	4.3
2019.05.13	Perez 1	BER	Prepared for and attended trial.	8.4
2019.05.13	Perez 1	DLS	Attended trial.	9.5

2019.05.13	Perez 1	LTF	Trial - Day Six and meeting after verdict.	7.7
2019.05.13	Perez 1	MCS	Traveled to courthouse, observed court proceedings and verdict, traveled back to office.	6.5
2019.05.13	Perez 1	SAB	Trial Day 6: jury deliberations, jury verdict, Phase 2 re willfulness (4.8); travel home SFO to Miami, analyzed trial transcripts for Phase 2 closing argument brief en route and developed strategy for post-trial collection & settlement efforts (7.0).	11.8
2019.05.13	Perez 1	YOK	Trial and prep. Meeting with team after trial.	9
2019.05.14	Perez 1	LTF	Dealt with a variety of post-trial issues including preservation of trial boxes as necessary, judgment and post-trial brief on willfulness and reviewed willfulness briefs from Wakefield case.	2.1
2019.05.14	Perez 1	SAB	Videoconf. w/ T. Fisher re strategy for proposed form of judgment and Phase 2 closing argument brief.	0.4
2019.05.14	Perez 1	YOK	call with LTF re willfulness brief and reviewed documents re same.	0.5
2019.05.15	Perez 1	BER	Conf. w/LTF and YOK re: Judgment form.	0.2
2019.05.15	Perez 1	LTF	Reviewed defendant's proposed judgment and letter to the Court and reviewed draft of plaintiff's proposed judgment, researched interest rates and discussed same with Yeremey Krivoshey.	1.8
2019.05.15	Perez 1	SAB	Revised draft form of judgment & videoconf. w/ Y. Krivoshey re same (.7).	0.7
2019.05.15	Perez 1	YOK	Worked on proposed final judgment and discussed same with LTF/BER. Emailed SAB re same. Worked on Phase 2 brief. Research re post-verdict procedures, notice, attorney's fees, costs, expenses, incentive awards.	7.8
2019.05.16	Perez 1	LTF	Discussed FRCP 69 and phase two brief with Yeremey Krivoshey.	0.3
2019.05.16	Perez 1	MCS	Assisted with filing judgment form, sent chambers copy.	1.5
2019.05.16	Perez 1	YOK	Worked on phase 2 brief and researched ways to collect on judgment and FRCP 69, discussed same with LTF.	7
2019.05.17	Perez 1	LTF	Discused phase 2 brief with Yeremey Krivoshey (x2) and Scott Bursor.	0.3
2019.05.17	Perez 1	YOK	Continued working on phase 2 brief and discussed same with LTF. Emailed trial team re same.	8.5
2019.05.18	Perez 1	LTF	Reviewed redlined brief re phase 2.	0.6
2019.05.18	Perez 1	SAB	Revised draft closing argument brief on Phase 2.	3.5
2019.05.18	Perez 1	YOK	Reviewed SAB's redline to phase 2 brief.	0.2
2019.05.20	Perez 1	DLS	Reviewed and added TOC/TOA (1); Made edits (.2), Finalized and filed brief (.4).	1.6
2019.05.20	Perez 1	LTF	Reviewed revised phase 2 brief, discussed it with Debbie Schroeder and reviewed emails regarding same and assisted with filing (.4); email exchange with Yeremey Krivoshey regarding call with Judge Hixson and sent email to Scott Bursor regarding same (.2).	0.6
2019.05.20	Perez 1	YOK	Revised phase 2 brief and circulated same to trial team. Calls with Debbie Schroeder re finalizing brief and filing. Reviewed Defendant's phase 2 brief.	3.6
2019.05.21	Perez 1	LTF	Reviewed defendant's brief and discussed it with Yeremey Krivoshey and Scott Bursor (.4); call with Judge Hixson and follow up discussion with Mr. Krivoshey and Mr. Bursor (.4).	0.8

2019.05.21	Perez 1	SAB	Pre-settlement teleconf. w/ Mag. J. Hixson (.3); videoconf. w/ T. Fisher & Y. Krivoshey re next steps (.3).	0.6
2019.05.21	Perez 1	YOK	Discussed Defendant's phase 2 brief with LTF and SAB, call with Judge Hixson re settlement and discussion re same with SAB and LTF.	0.8
2019.05.22	Perez 1	YOK	Discussed calendaring issue with Debbie Schroeder.	0.2
2019.05.23	Perez 1	YOK	Emailed Mr. Perez.	0.1
2019.05.28	Perez 1	YOK	Emailed KCC re notice.	0.1
2019.05.29	Perez 1	YOK	Researched re settlement conference statement and post-judgment execution.	1.5
2019.05.30	Perez 1	YOK	Emailed Mr. Perez.	0.1
2019.05.30	Perez 1	YOK	Worked on settlement conference statement.	1.6
2019.05.31	Perez 1	YOK	Drove to Sacramento for meeting with Mr. Perez and drove back to Walnut Creek following meeting.	4.5
2019.06.03	Perez 1	YOK	Reviewed invoice from KCC and emailed Debbie Schroeder re same. Worked on settlement conference statement.	6.1
2019.06.04	Perez 1	LTF	Reviewed settlement conference statement and exchanged emails with Yeremey Krivoshey regarding same.	0.4
2019.06.04	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re drafting settlement conference statement (.2).	0.2
2019.06.04	Perez 1	YOK	Finished writing draft settlement conference statement and sent it to trial team (6.2), and call with SAB re same (.2).	6.4
2019.06.05	Perez 1	DLS	Fixed formatting of settlement statement and served to Judge.	0.7
2019.06.05	Perez 1	SAB	Revised draft settlement conference statement.	1.5
2019.06.05	Perez 1	YOK	Rewrote introduction to settlement conference statement and finalized the statement. Reviewed defendant's settlement conference statement and emailed SAB re same.	3.6
2019.06.07	Perez 1	EMW	Booked SAB travel for settlement conference (.2).	0.2
2019.06.07	Perez 1	SAB	Prep for settlement conference (.5); email w/ M. Ellis re confidentiality of production of financial documents (.2).	0.7
2019.06.11	Perez 1	DLS	Coordinate delivery of mediation papers to SAB.	0.5
2019.06.11	Perez 1	LTF	Discussed settlement conference with Yeremey Krivoshey and Blair Reed and exchanged emails with Scott Bursor regarding same.	0.3
2019.06.11	Perez 1	SAB	Travel MIA to SFO, and prep for settlement conference en route (7.5).	7.5
2019.06.11	Perez 1	YOK	Multiple emails with defense counsel re financials produciton, discussion with LTF and BER re same, emails with SAB re same.	0.6
2019.06.12	Perez 1	BER	Travel to and attended settlement conference in San Francisco w/YOK and SAB.	4.6
2019.06.12	Perez 1	LTF	Discussed settlement conference with Scott Bursor and Yeremey Krivoshey and calendared new date for settlement conference.	0.3
2019.06.12	Perez 1	SAB	Prep for and attend settlement conference (5.3) debrief with team afterwards (.6); travel SFO to MIA (6.0).	11.9
2019.06.12	Perez 1	YOK	Traveled to SF for settlement conference, participated in conference, and traveled back home following conference. Discussed settlement conference with LTF.	6.8

2019.06.13	Perez 1	LTF	Discussed settlement conference with Yeremey Krivoshey and Blair Reed.	0.3
2019.06.13	Perez 1	YOK	Discussed settlement confernece with LTF and BER.	0.3
2019.06.18	Perez 1	YOK	Reviewed defendant's financial disclosures.	0.2
2019.06.19	Perez 1	BER	Conf. w/YOK re: Document production.	0.2
2019.06.19	Perez 1	DLS	Looked into accounts.	0.6
2019.06.19	Perez 1	HTG	Financial Document Review.	6
2019.06.19	Perez 1	YOK	Call with SAB re review of financial docs, discussed same with Harrison Geron, reviewed financial docs. Discussions with Debbie Schroeder re Paffit, Inc. and Defendant's potential moving money into trust and research re same. Emailed SAB re same. Emails with Mark Ellis re defendant's financial disclosures.	3.3
2019.06.20	Perez 1	HTG	Financial Document Review.	7
2019.06.20	Perez 1	YOK	Reviewed chron re production and discussed same with Harrison Geron and emailed LTF and SAB and BER re same, emailed Mark Ellis re missing production.	0.8
2019.06.21	Perez 1	LTF	Discussed settlement conference with Scott Bursor, Blair Reed and Yeremey Krivoshey.	0.4
2019.06.21	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re settlement negotiations and litigation strategy.	0.4
2019.06.21	Perez 1	YOK	Call with SAB re settlement conference (.4), call with Perez (.1), discussed same with LTF (.1), email from Mark Ellis re disclosures (.1).	0.7
2019.06.24	Perez 1	YOK	Prepared for settlement conference and emailed KCC re billing issue.	0.4
2019.06.25	Perez 1	BER	Travel to and attended settlement conference in San Francisco w/YOK.	3.3
2019.06.25	Perez 1	LTF	Reviewed order from ViSalus case and exchanged emails with Yeremey Krivoshey regarding settlement conference and discussed same with Blair Reed.	0.4
2019.06.25	Perez 1	YOK	Prepped for settlement confernece, traveled to SF and back for settlement confernece and participated in conference. Discussed same with BER and SAB. Reviewed order from ViSalus case re statutory damages.	4
2019.06.26	Perez 1	LTF	Discussed settlement conference with Yeremey Krivoshey.	0.1
2019.06.26	Perez 1	YOK	Discussed settlement with LTF.	0.1
2019.07.16	Perez 1	YOK	Reviewed invoice from CEG and emailed RSR and DLS re same.	0.2
2019.07.17	Perez 1	LTF	Reviewed articles regarding TCPA damages in ViSalus and 8th Circuit case and sent them to Yeremey Krivoshey.	0.3
2019.07.17	Perez 1	YOK	Reviewed 8th circuit decision re TCPA damages.	0.3
2019.07.22	Perez 1	YOK	Emailed Mr. Perez.	0.1
2019.07.23	Perez 1	YOK	Emailed RSR re KCC invoice.	0.1
2019.08.11	Perez 1	YOK	Emailed plaintiff.	0.1
2019.08.22	Perez 1	YOK	Eeviwed ViSalus TCPA ruling and emailed LTF re same.	0.3
2019.08.30	Perez 1	BSS	Conf. w/ YOK re: bad faith litigation against insurer.	0.1
2019.08.30	Perez 1	BSS	Researched bad faith claims against insurers.	4.2
2019.08.30	Perez 1	YOK	Call with SAB re potential suit re insurance bad faith coverage, multiple discussions with Brittany Scott re same, research re same.	0.6

2019.09.03	Perez 1	BSS	Researched bad faith claims against insurers.	6.3
2019.09.03	Perez 1	LTF	Discussed insurance research project with Brittany Scott and Yeremey Krivoshey.	0.2
2019.09.03	Perez 1	YOK	Discussed research re bad faith refusal to settle with BSS and LTF. Discussed same and other post-judgment issues with SAB.	0.5
2019.09.04	Perez 1	BSS	Researched baid faith claims against insurers.	2.6
2019.09.04	Perez 1	YOK	Reviewed BSS's memo re potential insurance lawsuit and discussed same with her. Research re insurance issues. Began working on memo re settlement discussions.	2.4
2019.09.05	Perez 1	BSS	Conf. w/ LTF & YOK re: bad faith litigation research.	0.4
2019.09.05	Perez 1	BSS	Conf. w/ YOK re: assignment of claim in bankruptcy.	0.1
2019.09.05	Perez 1	BSS	Researched assignment of bad faith claims.	4.3
2019.09.05	Perez 1	LTF	Discussed bad faith research with Scott Bursor, Yeremey Krivoshey and Brittany Scott.	0.7
2019.09.05	Perez 1	YOK	Call with SAB re settlement issues and research re insurance case. Discussions re settlement and post-judgment game plan with BSS and LTF. Continued working on settlement memo.	4.6
2019.09.06	Perez 1	BSS	Researched bad faith claims against insurers.	2.2
2019.09.06	Perez 1	BSS	Conf. w/ YOK re: next steps w/ bad faith research.	0.1
2019.09.06	Perez 1	LTF	Discussed bad faith research with Scott Bursor, Yeremey Krivoshey and Brittany Scott.	0.4
2019.09.06	Perez 1	SAB	Analyzed settlement offer from Mark Ellis, and analyzed the insurance policy and potential exposure for a bad faith insurance claim.	7.8
2019.09.06	Perez 1	YOK	Calls with SAB re settlement memo and insurance memo, circulated draft of settlement memo and saved the associated exhibits on box. Discussed BSS insurance memo and forwarded draft to SAB. Research re insurance issue.	8.2
2019.09.07	Perez 1	SAB	Analyzed Y. Krivoshey memo re chronology of settlement negotiations and developed potential bad faith failure to settle claim.	4.3
2019.09.08	Perez 1	SAB	Analyzed potential bad faith insurance claim and developed settlement strategy.	4.7
2019.09.09	Perez 1	BSS	Conf. w/ YOK re: willfulness.	0.1
2019.09.09	Perez 1	DLS	Filed letter to Judge.	0.3
2019.09.09	Perez 1	JMF	Prepared and sent chamber copies.	0.2
2019.09.09	Perez 1	LTF	Reviewed letter to Court and discussed it with Scott Bursor and Yeremey Krivoshey and Debbie Schroeder (re: filing) (.3); reviewed judgment and discussed it with Mr. Krivoshey (.2).	0.5
2019.09.09	Perez 1	SAB	Drafted letter to Judge Gonzalez Rogers withdrawing claim that violation was "knowing or wilful", including multiple videoconfs. w/ Y. Krivoshey and T. Fisher re same (2.5); developed settlement strategy and analyzed potential bad faith failure to settle claim (4.9); read Judgment that was entered today (.1).	7.5
2019.09.09	Perez 1	YOK	Finalized and filed letter re Phase 2 and discussed same with SAB and Debbie Schroeder. Emailed Frances Stone re letter. Worked on settlement chronology in table format and emailed SAB re same. Reviewed Order re Judgment and discussed same with LTF. Research re post-judgment deadlines.	6.4

2019.09.09	Perez 1	RSR	Formatted letter to Hon. Gonzalez Rogers for SAB.	0.1
2019.09.10	Perez 1	BSS	Conf. w/ LTF re: scheduling for assignments.	0.1
2019.09.10	Perez 1	LTF	Discussed judgment, fee application and settlement with Scott Bursor, Yeremey Krivoshey and Brittany Scott.	0.6
2019.09.10	Perez 1	MCS	Began compiling and formatting time entries.	2.7
2019.09.10	Perez 1	SAB	Developed settlement strategy including multiple videoconfs. w/ Y. Krivoshey and T. Fisher.	4.4
2019.09.10	Perez 1	YOK	Finished settlement chronology table and emailed it to SAB and LTF (2.0). Research re motion for attorney's fees (2.2). Calendared post-judgment dates (.2).	4.4
2019.09.11	Perez 1	BSS	Conf. w/ YOK re: bad faith materials.	0.1
2019.09.11	Perez 1	BSS	Download bad faith materials.	1
2019.09.11	Perez 1	LTF	Discussed settlement proposal with Yeremey Krivoshey.	0.3
2019.09.11	Perez 1	MCS	Continued compiling time entries, updated lodestar summary.	3
2019.09.11	Perez 1	SAB	Developed settlement strategy (2.3); teleconf. w/ M. Ellis re settlement negotiations and potential assignment of bad faith claims vs. ins. Co. (.6); videoconf. w/ Y. Krivoshey re same (.3); analyzed chronology of settlement communications (2.2).	5.4
2019.09.11	Perez 1	YOK	Call with SAB re insurance issue and researched re same (1.8). Continued research re motion for attorney's fees (1.3). Discussed settlement issue and case strategy with LTF (.2).	3.2
2019.09.12	Perez 1	MCS	Double checked diaries for missed time, added HTG time and updated lodestar summary.	2.2
2019.09.12	Perez 1	SAB	Settlement negotiations (.2); reviewed documents re settlement communications to develop bad faith refusal to settle claim and revised draft chronology (7.6).	7.8
2019.09.12	Perez 1	YOK	Worked on motion for attorney's fees.	2.3
2019.09.12	Perez 1	RSR	Formatted Chron for SAB (.5), organized expenses (1.5).	2
2019.09.13	Perez 1	MCS	Finalized chart and lodestar summary, sent to YOK.	1
2019.09.13	Perez 1	SAB	Reviewed documents re settlement communications to develop bad faith refusal to settle claim and revised draft chronology (4.3); videoconf. w/ Y. Krivoshey re same (.2).	4.5
2019.09.13	Perez 1	YOK	Continued working on motion for attorney's fees and emailed LTF and SAB re research re same (6.1), call with SAB re same (.2).	6.3
2019.09.14	Perez 1	SAB	Developed bad faith claim and bankruptcy strategy.	4.1
2019.09.15	Perez 1	SAB	Developed bad faith claim and bankruptcy strategy.	4.5
2019.09.16	Perez 1	BSS	Reviewed settlement timeline.	0.1
2019.09.16	Perez 1	MCS	Reviewed time entries and hours summary, sent to DLS/RSR.	0.6
2019.09.16	Perez 1	SAB	Developed bad faith claim and bankruptcy strategy.	4.7
2019.09.16	Perez 1	YOK	Reviewed SAB's settlement chronology doc, emailed him re same, discussed settlement conference notes with BER (.4). Worked on motion for attorney's fees (3.3).	3.9
2019.09.17	Perez 1	SAB	Analyzed chronology and developed litigation / settlement strategy (4.8); began drafting Assignment of Cause of Action in Exchange for Covenant Not to Execute (1.7).	6.5

2019.09.17	Perez 1	YOK	Discussed notice issue and motion for attorney's fees with SAB. Worked on motion for attorney's fees.	7.4
2019.09.18	Perez 1	BSS	Conf. w/ YOK re: case status.	0.1
2019.09.18	Perez 1	LTF	Discussed fee motion at firm meeting and with Yeremey Krivoshey afterwards.	0.2
2019.09.18	Perez 1	SAB	Drafting Assignment and developing settlement strategy.	4.3
2019.09.18	Perez 1	YOK	Worked on motion for fees and discussed same with LTF.	8.6
2019.09.19	Perez 1	LTF	Reviewed draft of fee motion.	0.2
2019.09.19	Perez 1	SAB	Drafting Assignment and developing settlement strategy.	4.5
2019.09.19	Perez 1	YOK	Worked on fee motion.	10.9
2019.09.20	Perez 1	DLS	Prepared TOC and reviewed brief for formatting.	0.5
2019.09.20	Perez 1	LTF	Discussed fee motion with Yeremey Krivoshey, further reviewed draft of motion and reviewed Scott Bursor's edits to the motion (.7); discussed weekend projects for fee motion with Mr. Krivoshey and Debbie Schroeder (.2).	0.9
2019.09.20	Perez 1	MCS	Updated time entries and hours summary, finalized.	1.5
2019.09.20	Perez 1	SAB	Revised draft fee application (7.6); revised draft assignment of rights (2.7); teleconf. w/ Michael Malter of Binder Malter, bankruptcy counsel for Rash Curtis re settlement negotiations (.4).	10.7
2019.09.20	Perez 1	YOK	Worked on fee motion and associated docs. Calls with SAB re same. Discussed same with LTF.	6.5
2019.09.21	Perez 1	LTF	Reviewed and edited diaries and exchanged messages with Yeremey Krivoshey regarding status of fee brief and reviewed emails regarding same.	2.7
2019.09.21	Perez 1	SAB	Revised draft fee application.	11.8
2019.09.21	Perez 1	YOK	Worked on Perez declaration and called Mr. Perez. Emailed Molly Sasseen re same. Worked on fee brief and calls with SAB re same.	6
2019.09.22	Perez 1	LTF	Reviewed and edited diaries and exchanged messages with Yeremey Krivoshey regarding status of fee brief and reviewed emails regarding same.	2.1
2019.09.22	Perez 1	SAB	Revised draft fee application.	13.2
2019.09.22	Perez 1	YOK	Worked on fee brief and Bursor declaration. Calls with SAB re same.	5.5
2019.09.23	Perez 1	DLS	Fixed formatting, prepared tables, finalized and filed fee brief.	3.2
2019.09.23	Perez 1	JIM	Reviewed and commented on fee brief and supporting Bursor declaration, and confer with S. Bursor about finalizing same.	2
2019.09.23	Perez 1	LTF	Reviewed fee brief, Bursor declaration, proposed order and Perez declaration and assisted with finalizing and filing fee motion and discussed same with Scott Bursor, Yeremey Krivoshey, Debbie Schroeder and Molly Sasseen.	5.3
2019.09.23	Perez 1	MCS	Proofread, edited and finalized expenses, finalized Perez declaration, assisted with finalizing brief and filing.	4
2019.09.23	Perez 1	SAB	Revised draft fee application.	14.3
2019.09.23	Perez 1	YOK	Drafted proposed order. Worked on fee brief. Calls with SAB and LTF re same. (11.2). Discussed strategy re settlement/insurance action with LTF/SAB (.5).	11.7

2019.09.23	Perez 1	YOK	Reviewed emails from defense counsel re settlement (.1). Call with SAB and LTF re action against insurer and settlement (.5). Discussed same with LTF (.1). Emailed notice administrator re updating website with new docs (.1).	0.8
2019.09.24	Perez 1	JMF	Sent chamber copies.	0.2
2019.09.24	Perez 1	LTF	Discussed next steps with Scott Bursor and Yeremey Krivoshey and reviewed filed fee motion and supporting declaration and conference with Mr. Krivoshey regarding notice and bad faith claim.	1.4
2019.09.24	Perez 1	SAB	Teleconf. w/ M. Malter re settlement negotiations (1.2); videoconf. w/ T. Fisher & Y. Krivoshey re same (.8); developed settlement strategy (3.5).	5.5
2019.09.24	Perez 1	YOK	Call with SAB and LTF re insurance action, discussed strategy with LTF. Research re motion for approval of notice plan. Emailed notice administrator re adding relevant case documents to website.	1.2
2019.09.26	Perez 1	SAB	Revised draft assignment of cause of action in exchange for covenant not to execute, developed settlement strategy, and settlement negotiations w/ M. Malter.	5.3
2019.09.27	Perez 1	LTF	Discussed case status with Yeremey Krivoshey.	0.1
2019.09.27	Perez 1	SAB	Settlement negotiations & developed settlement strategy.	6.1
2019.09.28	Perez 1	SAB	Developed settlement strategy.	4.4
2019.09.29	Perez 1	SAB	Developed settlement strategy.	4.8
2019.09.30	Perez 1	SAB	Revised draft assignment of cause of action in exchange for covenant not to execute and developed settlement strategy .	5.3
2019.09.30	Perez 1	YOK	Worked on motion re notice plan.	8.3
2019.10.01	Perez 1	SAB	Teleconf. w/ M. Malter re settlement negotiations (.4); teleconf. w/ Y. Krivoshey re settlement negotiations and draft motion re notice to the class (.3); teleconf. w/ M. Malter and [REDACTED] re same (.7); revised draft assignment (4.9); teleconf. w/ [REDACTED] re selection of John Burton as mediator (.4); executed mediation agreement (.2).	6.9
2019.10.01	Perez 1	YOK	Worked on notice motion. Call and email with KCC re same. Research re bad faith case against insurer. Research re assignability of malpractice claim and emailed LTF/SAB re same. Reviewed mediation agreement, and reviewed mediation production/statement.	11.2
2019.10.02	Perez 1	JMF	Print book and overnight to SAB.	2.3
2019.10.02	Perez 1	LTF	Reviewed production from Rash Curtis' bankruptcy counsel and discussed same with Yeremey Krivoshey and reviewed emails regarding same.	1.6
2019.10.02	Perez 1	SAB	Correspondence with mediator John Burton, teleconf. w/ [REDACTED], analyzed [REDACTED]'s mediation brief and supporting exhibits, and revised draft assignment (8.8); multiple teleconfs. w/ Y. Krivoshey re same (.5)	9.3
2019.10.02	Perez 1	YOK	Calls with SAB re mediation docs and reviewed docs re same. Continued research re bad faith case against insurer. Worked on motion for approval of notice plan.	8.8
2019.10.03	Perez 1	LTF	Reviewed notice of appeal.	0.1
2019.10.03	Perez 1	SAB	Settlement negotiations re assignment of cause of action, teleconf w/ [REDACTED] re same and analysis of newly produced documents.	7.5



2019.10.03	Perez 1	YOK	Worked on motion re notice plan, drafted long form, email, and post card notices and emailed SAB re same.	2.7
2019.10.04	Perez 1	BER	Conf. w/LTF re: insurance assignment and next steps .	0.2
2019.10.04	Perez 1	LTF	Discussed fee motion and new steps on settlement with Yeremey Krivoshey and Blair Reed and reviewed revisions to assignment.	0.5
2019.10.04	Perez 1	SAB	Settlement negotiations re assignment of cause of action.	7
2019.10.04	Perez 1	SAB	Revised draft motion re notice to the class (2.8); settlement negotiations re assignment of cause of action (5.0).	7.8
2019.10.04	Perez 1	YOK	Reviewed SAB's edits to notice motion and edited same. Updated notice exhibits. Reviewed KCC declaration. Reviewed assignment agreement and research re same.	4.4
2019.10.06	Perez 1	LTF	Reviewed email regarding status of assignment.	1
2019.10.07	Perez 1	DLS	Filed motion for proposed notice plan.	1
2019.10.07	Perez 1	LTF	Reviewed emails regarding status of assignment and gathered emails for Yeremey Krivoshey for final execution papers (.3); discussed notice issue with Mr. Krivoshey (.2).	0.5
2019.10.07	Perez 1	SAB	Negotiated and finalized assignment of cause of action in exchange for covenant not to execute.	6.8
2019.10.07	Perez 1	YOK	Finalized and filed motion re notice plan. Discussed notice issues with KCC. Calls with SAB re Assignment of claim and notice motion, and appeal issues. Redlined and finalized Assignment and circulated same. Gathered all exhibits for the Assignment. Called Perez. Reviewed Defendant's late-night filings re amended judgment, ex parte, opposition to fees, stay.	9.2
2019.10.08	Perez 1	DLS	Assisted Judy with copies for SAB.	1
2019.10.08	Perez 1	JMF	Sent chamber copies.	0.4
2019.10.08	Perez 1	JMF	Overnighted filed documents to SAB.	2.3
2019.10.08	Perez 1	LTF	Reviewed opposition to motion for attorneys' fees and motions to amend judgment and discussed them with Yeremey Krivoshey.	0.8
2019.10.08	Perez 1	SAB	Teleconf. w/ [REDACTED] re finalizing assignment/covenant and next steps (.5); email corresp. re executing assignment/covenant (.3); read Rash Curtis ex parte application for stay, and various other motions filed yesterday (4.4).	5.2
2019.10.08	Perez 1	YOK	Finalized Assignment agreement and emails with SAB and defense counsel re same. Analyzed Defendant's motion to stay and motion to amend judgment and research re same.	3.9
2019.10.09	Perez 1	LTF	Reviewed emails regarding assignment and pending motions and discussed same with Scott Bursor and Yeremey Krivoshey.	0.8
2019.10.09	Perez 1	SAB	Analyzed pending motions and developed strategy for motion to approve assignment/covenant (5.9); drafted proposed stip to notify court of assignment-covenant (1.3); multiple videoconfs. w/ Y. Krivoshey and T. Fisher re strategy and compliance with local rules (1.1); multiple teleconfs. w/ [REDACTED] re same (.8); email corresp. w/ M. Ellis et al. re draft stip (.4).	9.5

2019.10.09	Perez 1	YOK	Discussions and emails with SAB re scheduling and case management, drafted stipulation withdrawing D's bond motions and authorizing assignment, research re mediation privilege and emailed SAB re same. Research re issues concerning assignment. Reviewed Ellis letter.	5.8
2019.10.09	Perez 1	RSR	Prepared Assignment book for SAB (.7).	0.7
2019.10.10	Perez 1	LTF	Discussed revised assignment with Yeremey Krivoshey and reviewed order setting status conference and calendared date for CMC statement.	0.3
2019.10.10	Perez 1	SAB	Settlement negotiations, including drafting corrected assignment-covenant, teleconf. w/ M. Malter and [REDACTED] and Y. Krivoshey re same, and multiple videoconfs. w/ Y. Krivoshey re same.	11.5
2019.10.10	Perez 1	YOK	Call with Rash Curtis counsel re assignment/stipulation/next steps. Worked with SAB to revise and finalize revised assignment and exhibits thereto. Reviewed Case Management Order and discussed same with SAB and LTF.	8.2
2019.10.11	Perez 1	EMW	Organized and sent SAB Corrected Assignment w/ exhibits.	0.4
2019.10.11	Perez 1	LTF	Reviewed emails regarding postponement of upcoming deadlines and discussed same with Yeremey Krivoshey.	0.3
2019.10.11	Perez 1	SAB	Revised assignment-covenant to correct exhibit references, including multiple teleconfs. and videoconfs. w/ Y. Krivoshey re same (8.3); teleconf. w/ M. Malter, [REDACTED] & Y. Krivoshey re corrections to the assignment-covenant and next steps (.8).	9.1
2019.10.11	Perez 1	YOK	Called client, discussed scheduling issues with LTF, worked on assignment issues with SAB. Drafted stipulation staying deadlines and discussed same with SAB.	1.6
2019.10.14	Perez 1	SAB	Email to [REDACTED] re signatures to corrected assignment-covenant (.2); teleconf. w/ [REDACTED] re next steps (.4); drafted letter to Judge Gonzalez Rogers requesting stay of briefing deadlines (.8); developed strategy for seeking court approval of assignment-covenant (2.8); analyzed cryptic email from M. Ellis responding to my request for a stay (.2).	4.4
2019.10.15	Perez 1	DLS	Filed SAB letter.	0.3
2019.10.15	Perez 1	JMF	Prepared and overnighted assignment book to SAB.	0.9
2019.10.15	Perez 1	JMF	Sent chamber copies.	0.2
2019.10.15	Perez 1	LTF	Discussed assignment book and letter to Judge Gonzalez Rogers with Scott Bursor and Yeremey Krivoshey (.2); reviewed order in response to letter and discussed next steps with Mr. Krivoshey and reviewed emails from Scott Bursor and defendant's counsel (.3).	0.5
2019.10.15	Perez 1	SAB	Revised draft letter to Judge Gonzalez Rogers requesting stay of briefing deadlines (1.3); email to Y. Krivoshey et al re next steps (.2); videoconf. w/ T. Fisher & Y. Krivoshey re same (.3); motion to approve assignment (4.8).	6.5
2019.10.15	Perez 1	YOK	Reviewed letter re stay and assignment and assisted with filing same. Emailed letter to defense counsel. Worked on assignment issues with SAB. Reviewed scheduling order and discussed same with LTF and SAB.	2
2019.10.16	Perez 1	LTF	Discussed next steps with Scott Bursor and Yeremey Krivoshey.	0.4

2019.10.16	Perez 1	SAB	Drafted motion to approve assignment including multiple videoconfs. w/ T. Fisher and Y. Krivoshey re same.	9
2019.10.16	Perez 1	YOK	Emails with Ms. Stone to set up court call. Research re motion to approve assignment and emailed SAB re same. Call with LTF/SAB re assignment/scheduling issues.	5.1
2019.10.17	Perez 1	DLS	Assisted with motion to approve assignment.	0.9
2019.10.17	Perez 1	DLS	Filed motion to advance hearing.	0.9
2019.10.17	Perez 1	JMF	Sent chamber copies.	0.8
2019.10.17	Perez 1	JMF	Prepared and overnighted book to SAB.	0.6
2019.10.17	Perez 1	LTF	Reviewed assignment motion and discussed it with Scott Bursor and Yeremey Krivoshey and reviewed ex parte and related documents and discussed those with Mr. Krivoshey (.7); discussed filing book for Scott Bursor with Debbie Schroeder (.2).	0.9
2019.10.17	Perez 1	SAB	Revised draft motion to approve assignment and related papers (8.3); multiple videoconfs. w/ T. Fisher and Y. Krivoshey re same (1.7); teleconf. w/ [REDACTED] (.7); teleconf. w/ M. Malter (.2).	10.9
2019.10.17	Perez 1	YOK	Drafted administrative motion to shorten time, declaration in support, and proposed order. Assisted with motion to approve assignment and drafted SAB declaration/proposed order, discussed same with LTF and SAB. Emailed both motions and associated docs to Michael Malter and [REDACTED].	5.9
2019.10.18	Perez 1	DLS	Filed statement.	0.2
2019.10.18	Perez 1	JMF	Sent chamber copies.	0.2
2019.10.18	Perez 1	LTF	Discussed CMC statement with Scott Bursor and Yeremey Krivoshey and reviewed CMC statement and defendant's insert to statement and reviewed emails regarding same and discussed order setting conference call on 10/21 with Mr. Bursor and Mr. Krivoshey.	1.9
2019.10.18	Perez 1	SAB	Drafted joint statement re scheduling (3.1); teleconf. w/ M. Ellis re same (.2), multiple videoconfs. w/ T. Fisher & Y. Krivoshey re same (.8).	4.1
2019.10.18	Perez 1	YOK	Call with LTF and SAB re joint statement, worked on joint statement filed same. Circulated dial in information to chambers for court call. Began working on oppositions to Defendant's motions to amend judgment.	6.3
2019.10.21	Perez 1	BSS	Court call w/ LTF, SAB, & YOK.	0.6
2019.10.21	Perez 1	BSS	Conf. w/ LTF & YOK re: next steps.	0.4
2019.10.21	Perez 1	BSS	Researched law re: prevailing parties and waiver of objection to form of judgment.	1.5
2019.10.21	Perez 1	BSS	Reviewed proposed judgments, motion opposing attys' fees, and mtn to amend judgment.	0.5
2019.10.21	Perez 1	LTF	Listened to call with Judge Gonzalez Rogers and discussed next steps with Scott Bursor, Yeremey Krivoshey and Brittany Scott.	0.9
2019.10.21	Perez 1	SAB	Prep for and attended telephonic hearing (2.8); videoconf. w/ T. Fisher and Y. Krivoshey re next steps (.3); teleconf. w/ M. Malter re next steps (.3).	3.4
2019.10.21	Perez 1	YOK	Listened in on court call and discussed same with LTF and SAB and BSS. Continued working on opposition to D's motion to reduce judgment. Discussed oppositions to D's motions with SAB.	8.4

2019.10.22	Perez 1	BSS	Researched prevailing party and waiver of objection to judgment case law.	1.2
2019.10.22	Perez 1	BSS	Conf. w/ YOK re: prevailing party and waiver research.	0.2
2019.10.22	Perez 1	BSS	Conf. w/ YOK re: substance of final judgment.	0.1
2019.10.22	Perez 1	BSS	Researched mandatory content of judgments.	1
2019.10.22	Perez 1	SAB	Developed strategy for briefing post-trial motions and legal research re motions to amend/alter the judgment, including multiple videoconfs. w/ Y. Krivoshey re same.	10.3
2019.10.22	Perez 1	YOK	Discussed research re opposition to motion to amend judgment with BSS and reviewed docs re same with BSS and SAB. Continued working on opposition to Defendant's motion to reduce judgment.	9.2
2019.10.23	Perez 1	BSS	Researched mandatory content of judgments.	0.9
2019.10.23	Perez 1	BSS	Reviewed opposition to motion to reduce judgment.	0.2
2019.10.23	Perez 1	DLS	Prepared pleading and TOC for SAB.	1.2
2019.10.23	Perez 1	SAB	Drafted opposition to Defendant's motion to alter or amend judgment.	10.8
2019.10.23	Perez 1	YOK	Continued working on opposition to Defendant's motion to reduce judgment and circulated draft. Discussed defendant's motion to amend judgment with SAB.	3.7
2019.10.24	Perez 1	SAB	Drafted opposition to Defendant's motion to alter or amend judgment.	10.2
2019.10.25	Perez 1	BSS	Reviewed opp to mtn to amend judgment.	0.2
2019.10.25	Perez 1	BSS	Reviewed approval order re: assignment.	0.1
2019.10.25	Perez 1	LTF	Reviewed opposition to motion to amend judgment.	0.4
2019.10.25	Perez 1	SAB	Drafted opposition to Defendant's motion to alter or amend judgment.	8.8
2019.10.25	Perez 1	YOK	Reviewed order approving assignment and emailed SAB re same.	0.1
2019.10.29	Perez 1	MCS	Opened new matter and calendar for bad faith claim.	0.7
2019.10.29	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re drafting complaint, analyzed venue issues.	0.5
2019.10.29	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re post-trial briefs (.4); revised draft post-trial briefs (3.8).	4.2
2019.10.29	Perez 1	YOK	Worked on Indian Harbor complaint.	5.2
2019.10.30	Perez 1	BSS	Reviewed opp to mtn to reduce judgment.	0.2
2019.10.30	Perez 1	DLS	Filed opp to motion to amend judgment; TOA and Edits.	1.3
2019.10.30	Perez 1	DLS	Prepared TOA/TOC opposition to reduce judgment; made edits and filed.	2.3
2019.10.30	Perez 1	LTF	Reviewed updated draft of opposition to motion to amend judgment and discussed it with Yeremey Krivoshey (.4); reviewed redlines to opposition to amend judgment on due process grounds (.2).	0.6
2019.10.30	Perez 1	SAB	Revised draft oppn to post-trial motions.	10.8
2019.10.30	Perez 1	YOK	Worked on bad faith complaint.	5.5
2019.10.30	Perez 1	YOK	Finalized and filed opposition to motions to amend/reduce judgment, discussed same with LTF, BSS, and SAB.	4.4
2019.10.31	Perez 1	BSS	Reviewed draft complaint re bad faith claim.	0.2
2019.10.31	Perez 1	DLS	Prepared initial docs re bad faith claim.	1

2019.10.31	Perez 1	JMF	Prepared summons.	0.3
2019.10.31	Perez 1	JMF	Sent chamber copies.	0.2
2019.10.31	Perez 1	LTF	Reviewed Indian Harbor complaint, CACI instruction and applicable civil code sections and exchanged emails with Yeremey Krivoshey regarding same and reviewed emails from Scott Bursor.	1.3
2019.10.31	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re draft complaint (.4); analyzed draft complaint (1.8).	2.2
2019.10.31	Perez 1	YOK	Worked on complaint and discussed same with SAB and BSS. Emailed LTF re same. Discussions with Debbie Schroeder re complaint, service, cover sheet, summons.	4.6
2019.11.01	Perez 1	SAB	Revised draft complaint.	4
2019.11.02	Perez 1	LTF	Reviewed revised Indian Harbor complaint and emails from Yeremey Krivoshey regarding same.	0.4
2019.11.02	Perez 1	SAB	Revised draft complaint.	5.1
2019.11.02	Perez 1	YOK	Reviewed SAB's draft complaint and emailed SAB, LTF, BER, and BSS re same.	0.8
2019.11.03	Perez 1	LTF	Reviewed emails regarding revised complaint.	0.1
2019.11.03	Perez 1	SAB	Revised draft complaint and draft retainer, developed legal strategy.	5.5
2019.11.03	Perez 1	YOK	Reviewed email re complaint (.1), emailed plaintiff (.2).	0.3
2019.11.04	Perez 1	LTF	Reviewed revised complaint and discussed it with Yeremey Krivoshey.	0.5
2019.11.04	Perez 1	YOK	Called and messaged plaintiff (.2), emailed RR re same (.1). Analyzed complaint and discussed same with LTF (.5).	0.8
2019.11.05	Perez 1	DLS	Finalized, made edits and filed complaint.	1.6
2019.11.05	Perez 1	MCS	Assisted with initiating documents and filing complaint.	1.9
2019.11.05	Perez 1	YOK	Finalized and filed complaint and associated docs (1.4), call with SAB re complaint (.1), discussed complaint with LTF (.1).	1.6
2019.11.06	Perez 1	LTF	Discussed next steps and judicial assignment with Yeremey Krivoshey.	0.2
2019.11.06	Perez 1	YOK	Discussed judicial assignment with Debbie Schroeder (.1), and discussed same with LTF (.2)	0.3
2019.11.06	Perez 1	YOK	Reviewed defendant's replies ISO motions to amend/reduce the judgment (1.5). Reviewed 9th Circuit assessment Order (.1).	1.6
2019.11.07	Perez 1	JMF	Served complaint and initiating documents.	0.6
2019.11.07	Perez 1	JMF	Created hearing book TOC for SAB and YOK.	1.2
2019.11.07	Perez 1	LTF	Reviewed reply briefs on motions to amend judgment and discussed Perez retainer with Yeremey Krivoshey.	0.7
2019.11.07	Perez 1	SAB	Prep for upcoming hearing.	1.3
2019.11.07	Perez 1	YOK	Discussed retainer with LTF. Reviewed order re judicial referral.	0.2
2019.11.07	Perez 1	YOK	Assisted LTF and Judy Fontanilla with prep for hearing.	0.5
2019.11.08	Perez 1	JMF	Served complaint and initiating documents to XL Group, LTD.	0.3
2019.11.08	Perez 1	JMF	Prepared hearing book for SAB and YOK (2); Overnighed books to SAB (.3).	2.3

2019.11.08	Perez 1	YOK	Call with Perez, and emailed SAB and RR re same (.4). Discussed service with Judy Fontanilla and reviewed docs re same (.2).	0.6
2019.11.15	Perez 1	LTF	Participated in mediation call and discussed same with Yeremey Krivoshey (.4); discussed 11/18 hearings with Mr. Krivoshey (.1).	0.5
2019.11.15	Perez 1	SAB	Prep for hearing on post-trial motions.	7.5
2019.11.15	Perez 1	YOK	Mediation call with 9th Circuit mediator (.3) and discussed same with LTF (.1), emailed SAB re same (.1), discussed hearing with BSS (.1).	0.6
2019.11.16	Perez 1	LTF	Email exchange with Scott Bursor re: 9th Circuit mediation call.	0.1
2019.11.16	Perez 1	SAB	Prep for hearing on post-trial motions.	3.3
2019.11.17	Perez 1	SAB	Travel MIA to SFO, prep for hearing en route.	8.5
2019.11.18	Perez 1	BER	Debrief hearing with YOK and SAB (.4); read Defendant's proposed amended judgment (.2).	0.6
2019.11.18	Perez 1	BSS	Traveled to hearing in Oakland (.3), attended hearing (2), and traveled back to Walnut Creek (.7).	3
2019.11.18	Perez 1	BSS	Conf. w/ LTF re: Rash Curtis Hearing.	0.1
2019.11.18	Perez 1	LTF	Discussed hearing on motions to amend judgment with Brittany Scott.	0.2
2019.11.18	Perez 1	SAB	Prep for and attended hearing on post-trial motions (3.2); debrief with Y. Krivoshey and B. Reed (.4); read Defendant's proposed amended judgment (.2).	3.8
2019.11.18	Perez 1	YOK	Prepped for and attended hearing with SAB and BSS (2.5), discussed hearing with SAB and BSS (.4), reviewed proposed amended judgment and discussed with SAB (.2).	3.1
2019.11.25	Perez 1	YOK	Emailed notice administrator re notice.	0.2
2019.12.02	Perez 1	YOK	Worked on reply ISO fee motion.	3.4
2019.12.03	Perez 1	DLS	Sent email to Court reporter re transcript; prepared transcript request and filed.	0.7
2019.12.03	Perez 1	SAB	Reply brief re fee application.	3
2019.12.03	Perez 1	YOK	Emailed trial team re scheduling issues (.2), and emailed defense counsel re stipulation (.1), research re fee reply brief (1.8).	2.1
2019.12.04	Perez 1	DLS	Fixed formatting and made corrections to stip and prop order; filed.	1
2019.12.04	Perez 1	JMF	Sent check to clerk for transcript request (.2); Sent chamber copies (.2).	0.4
2019.12.04	Perez 1	SAB	Reply brief re fee application.	3.3
2019.12.04	Perez 1	YOK	Drafted stipulation extending deadline to file reply in support of fees motion and emailed defense counsel re same.	0.8
2019.12.05	Perez 1	BSS	Conf. w/ YOK re: 11.18.19 hearing and scheduling conflicts.	0.1
2019.12.05	Perez 1	DLS	Email exchange w/ court reporter re transcript.	0.3
2019.12.05	Perez 1	DLS	Fixed formatting and filed letter.	0.8
2019.12.05	Perez 1	JMF	Sent chambers copies.	0.2
2019.12.05	Perez 1	LTF	Reviewed order on attorneys' fee reply and discussed it with Yeremey Krivoshey and Blair Reed and reviewed letter to Court regarding same.	0.8
2019.12.05	Perez 1	SAB	Reply brief re fee application.	3.5

2019.12.05	Perez 1	YOK	Reviewed order denying stipulation (.1), emails with trial team re same (.2), drafted and filed supplemental letter in support of stipulation (.7), discussions with LTF and BER re same (.3).	1.3
2019.12.06	Perez 1	LTF	Reviewed order regarding extension of time and exchanged messages with Yeremey Krivoshey regarding same.	0.2
2019.12.06	Perez 1	SAB	Reply brief re fee application.	3.2
2019.12.06	Perez 1	YOK	Reviewed order re extension of time to file reply brief and emailed LTF and BER re same.	0.2
2019.12.07	Perez 1	LTF	Email exchange with Scott Bursor regarding fee reply brief.	0.3
2019.12.07	Perez 1	SAB	Reply brief re fee application.	3.1
2019.12.08	Perez 1	SAB	Reply brief re fee application.	2.7
2019.12.09	Perez 1	BER	Discussed next steps with LTF and YOK.	0.2
2019.12.09	Perez 1	LTF	Discussed fee reply brief with Yeremey Krivoshey and Blair Reed.	0.4
2019.12.09	Perez 1	SAB	Reply brief re fee application.	2.9
2019.12.09	Perez 1	YOK	Worked on reply brief (8.5), and discussed same with LTF and BER (.4).	8.9
2019.12.10	Perez 1	BER	Discussed research for fee brief with YOK.	0.2
2019.12.10	Perez 1	BER	Researched case law for fee application brief.	2.3
2019.12.10	Perez 1	SAB	Reply brief re fee application.	2.9
2019.12.10	Perez 1	YOK	Worked on reply brief.	9.1
2019.12.11	Perez 1	BER	Researched case law for fee application brief.	4.9
2019.12.11	Perez 1	BER	Drafted memo regarding research for fee application brief.	1.3
2019.12.11	Perez 1	LTF	Discussed fee reply brief with Yeremey Krivoshey and Blair Reed.	0.3
2019.12.11	Perez 1	SAB	Reply brief re fee application.	2.8
2019.12.11	Perez 1	YOK	Worked on reply brief (8.7), discussed same with LTF and BER (.3). Emailed 9th Circuit mediation re update (.2).	9.2
2019.12.12	Perez 1	SAB	Reply brief re fee application.	3.2
2019.12.13	Perez 1	LTF	Call with 9th Circuit mediation coordinator.	0.2
2019.12.13	Perez 1	SAB	Reply brief re fee application.	3.3
2019.12.14	Perez 1	SAB	Reply brief re fee application.	3.5
2019.12.15	Perez 1	LTF	Email exchange with Scott Bursor regarding fee reply brief and sent various materials to Mr. Bursor for his review.	0.7
2019.12.15	Perez 1	SAB	Reply brief re fee application.	2.5
2019.12.16	Perez 1	SAB	Reply brief re fee application.	2.2
2019.12.16	Perez 1	YOK	Reviewed 9th Circuit order from mediator and emailed Debbie Schroeder re same.	0.1
2019.12.17	Perez 1	LTF	Reviewed Scott Bursor's edits to fee reply brief.	0.5
2019.12.17	Perez 1	SAB	Reply brief re fee application.	1.7
2019.12.17	Perez 1	YOK	Analyzed Krakauer decision from SCOTUS and strategized whether to file notice of supplemental authority.	0.2

2019.12.18	Perez 1	BER	Reviewed reply fee application brief.	0.8
2019.12.18	Perez 1	LTF	Discussed fee reply brief with Yeremey Krivoshey and Blair Reed and reviewed Scott Bursor's edits.	0.4
2019.12.18	Perez 1	SAB	Reply brief re fee application.	4.1
2019.12.18	Perez 1	YOK	Worked on fee reply brief.	7.9
2019.12.19	Perez 1	BSS	Reviewed fee reply brief.	0.2
2019.12.19	Perez 1	LTF	Reviewed and revised fee reply brief and discussed it with Yeremey Krivoshey and Blair Reed.	1.3
2019.12.19	Perez 1	SAB	Reply brief re fee application.	3.5
2019.12.19	Perez 1	YOK	Continued working on fee reply brief (8.1), and discussed same with LTF (.2).	8.3
2019.12.20	Perez 1	DLS	Prepared tables and filed reply.	1
2019.12.20	Perez 1	JMF	Sent chambers copies.	0.2
2019.12.20	Perez 1	LTF	Reviewed fee reply and discussed it with Yeremey Krivoshey and Debbie Schroeder.	1.1
2019.12.20	Perez 1	SAB	Reply brief re fee application.	7.8
2019.12.20	Perez 1	YOK	Finalized and filed fee reply brief (4.4), call with SAB re same (.3), discussions with LTF and Debbie Schroeder re same (.3).	5
2019.12.26	Perez 1	YOK	Reviewed new Krakauer decision, emailed trial team re same, and drafted and circulated notice of supplemental authority re same.	1.3
2019.12.27	Perez 1	DLS	Finalized and filed supplemental authority.	0.6
2019.12.27	Perez 1	JMF	Sent chamber copies.	0.3
2019.12.27	Perez 1	YOK	Finalized and filed notice of supplemental authority and emailed SAB re same.	0.3
2020.01.02	Perez 1	YOK	Reviewed Indian Harbor MTDs/Motion to Strike and started research re MTD opposition.	3.9
2020.01.03	Perez 1	LTF	Reviewed MTDs and MTS and reviewed Yeremey Krivoshey's memo regarding final judgment.	1.3
2020.01.03	Perez 1	SAB	Analyzed Ds' motions to dismiss and motions to strike, including videoconf. w/ Y. Krivoshey re same.	6.8
2020.01.03	Perez 1	YOK	Call with SAB re MTDs and Motion to Strike (.2), drafted and circulated memo re MTD opposition (4.6).	4.8
2020.01.04	Perez 1	YOK	Emailed Perez.	0.1
2020.01.06	Perez 1	BSS	Reviewed "Final Judgment" Memo (0.1).	0.1
2020.01.06	Perez 1	DLS	Prepared pleading template.	0.9
2020.01.06	Perez 1	LTF	Discussed MTDs and MTS with Yeremey Krivoshey and reviewed email regarding same.	0.5
2020.01.06	Perez 1	SAB	Analyzed Ds' motion to dismiss and to strike.	3.2
2020.01.06	Perez 1	YOK	Continued working on opposition to MTD and emails with trial team re same.	8.4
2020.01.07	Perez 1	BSS	Reviewed memo re: final judgment case law.	0.1
2020.01.07	Perez 1	YOK	Worked on opposition to MTD.	7.1
2020.01.08	Perez 1	BSS	Reviewed MTD opposition brief (0.2).	0.2



2020.01.08	Perez 1	DLS	Prepared TOC for draft MTD Opp.	0.5
2020.01.08	Perez 1	LTF	Reviewed revised opposition to motion to dismiss and exchanged emails with Yeremey Krivoshey regarding same.	0.5
2020.01.08	Perez 1	SAB	Revised draft oppn to MTDs.	2.5
2020.01.08	Perez 1	YOK	Continued working on opposition to MTD (1.5) and discussed same with LTF (.2). Started working on opposition to MTS (6.3).	8
2020.01.08	Perez 1	YOK	Emailed plaintiff.	0.1
2020.01.09	Perez 1	LTF	Discussed confidentiality issue with Yeremey Krivoshey.	0.2
2020.01.09	Perez 1	SAB	Revised draft oppn to MTDs.	5.3
2020.01.09	Perez 1	YOK	Continued working on opposition to MTS (7.9), discussed same with LTF (.2).	8.1
2020.01.10	Perez 1	SAB	Revised draft oppn to MTDs.	5.1
2020.01.10	Perez 1	YOK	Worked on opposition to MTS.	8.6
2020.01.11	Perez 1	SAB	Revised draft oppn to MTDs and developed litigation strategy.	4.7
2020.01.12	Perez 1	SAB	Revised draft oppn to MTDs and developed litigation strategy.	4.9
2020.01.12	Perez 1	YOK	Worked on opposition to MTS.	3.6
2020.01.13	Perez 1	LTF	Discussed motion to strike opposition with Yeremey Krivoshey.	0.2
2020.01.13	Perez 1	SAB	Revised draft MTD oppns.	7.3
2020.01.13	Perez 1	YOK	Continued working on opposition to MTS (8.1), call with SAB re same (.3), discussed same with LTF (.2).	8.6
2020.01.14	Perez 1	BSS	Reviewed Opp'n to Indian Harbor MTD/Stay (0.2); Conf. w/ LTF re: revision to MTD Opp (0.1).	0.3
2020.01.14	Perez 1	DLS	Added TOA to Opp to MTD and fixed formatting; added TOA to Opp to MTS and fixed formatting.	1.9
2020.01.14	Perez 1	LTF	Reviewed revised MTD opposition, discussed it with Yeremey Krivoshey, Debbie Schroeder and Molly Sasseen and reviewed emails regarding same.	1.1
2020.01.14	Perez 1	MCS	Proofread brief for typos.	1.1
2020.01.14	Perez 1	SAB	Revised draft mtd oppns (8.1); multiple videoconfs. w/ Y. Krivoshey re same (.6).	8.7
2020.01.14	Perez 1	YOK	Reviewed revised MTD opposition and discussed same with LTF (.8). Continued working on MTS opposition and circulated draft of same (5.2). Worked on opposition to motion to dismiss for lack of personal jurisdiction (3.2).	9.2
2020.01.15	Perez 1	DLS	Updated tables to opposition brief.	0.5
2020.01.15	Perez 1	DLS	Prepared TOA/TOC for MTS opp and made edits.	1.2
2020.01.15	Perez 1	DLS	Prepared TOC for MTD for Lack of Jurisdiction.	0.3
2020.01.15	Perez 1	LTF	Discussed jurisdictional motion with Yeremey Krivoshey (.1); reviewed and revised opposition to motion to strike and discussed it with Mr. Krivoshey and Debbie Schroeder and reviewed Scott Bursor's edits to same (2.6); discussed exhibit issue with Mr. Krivoshey and Molly Sasseen (.2).	2.9

2020.01.15	Perez 1	SAB	Revised draft oppositions to MTDs and motion to strike (7.3); videoconf. w/ Y. Krivoshey re same (.3).	7.6
2020.01.15	Perez 1	YOK	Finished drafting and circulated draft of opposition to motion to dismiss for lack of personal jurisdiction (8.9) and calls with SAB re same (.3).	9.2
2020.01.15	Perez 1	YOK	Drafted and emailed status report to 9th Circuit mediator.	0.3
2020.01.16	Perez 1	DLS	Made edits to all briefs; finalized and filed.	3
2020.01.16	Perez 1	JMF	Sent chambers copies.	0.3
2020.01.16	Perez 1	LTF	Reviewed and revised opposition to jurisdictional motion and reviewed final drafts of opposition to MTD and MTS and discussed same with Yeremey Krivoshey and Debbie Schroeder and reviewed emails from Scott Bursor re: same.	1.9
2020.01.16	Perez 1	MCS	Assisted with exhibits/Krivoshey declaration issues (5.9), and assisted Debbie with finalizing (.6).	6.5
2020.01.16	Perez 1	YOK	Finalized and filed 3 oppositions to Defs' MTDs/MTS, drafted Krivoshey declaration, and drafter proposed orders in support of oppositions. Calls with SAB re same.	8.7
2020.01.16	Perez 1	YOK	Call with 9th Circuit mediator.	0.1
2020.01.16	Perez 1	RSR	Assisted with MTD Oppns due today.	0.3
2020.01.17	Perez 1	JMF	Sent chambers copies.	0.2
2020.01.17	Perez 1	YOK	Call with SAB re CMC scheduling and ADR issue (.2). Emailed defense counsel re same (.2).	0.4
2020.01.22	Perez 1	LTF	Discussed motion to vacate judgment with Yeremey Krivoshey and briefly reviewed papers.	0.4
2020.01.22	Perez 1	YOK	Emailed counsel for Mr. Kizer re his new declaration (.2), worked on opposition to motion to vacate (6.9).	7.1
2020.01.22	Perez 1	RSR	Saved Motion to Vacate Judgment ECFs to box and emailed SAB same (.2).	0.2
2020.01.23	Perez 1	YOK	Reviewed Defendant's replies ISO MTDs/MTS.	1.2
2020.01.23	Perez 1	YOK	Worked on opposition to motion to vacate (8.1) and emailed SAB re same (.1).	8.2
2020.01.24	Perez 1	LTF	Discused response to motion to vacate judgment with Yeremey Krivoshey.	0.2
2020.01.24	Perez 1	YOK	Continued working on opposition to motion to vacate.	7.5
2020.01.27	Perez 1	SAB	Videoconf w/ Y. Krivoshey re drafting opposition to motion to vacate judgment.	0.6
2020.01.27	Perez 1	YOK	Emailed defense counsel re ADR certification.	0.1
2020.01.27	Perez 1	YOK	Continued working on opposition to motion to vacate (9.0), and call with SAB re same (.6).	9.6
2020.01.28	Perez 1	BSS	Conf. w/ YOK re: hearing books (0.1); Conf. w/ MCS re: hearing books (0.1); Reviewed hearing book table of contents (0.2); Emailed drafts to YOK for preapproval (0.1).	0.5
2020.01.28	Perez 1	BSS	Reviewed hearing book table of contents (0.2); Reviewed YOK's edits to TOC (0.1); Emailed SAB re: hearing book TOC (0.1).	0.4
2020.01.28	Perez 1	MCS	Drafted and finalized book TOCs for MTDs and MTS.	1.5
2020.01.28	Perez 1	MCS	Drafted and finalized book TOC for Fee motion.	0.8

2020.01.28	Perez 1	SAB	Videoconf w/ Y. Krivoshey re drafting opposition to motion to vacate judgment (.3); analyzed motion to vacate judgment (2.5).	2.8
2020.01.28	Perez 1	YOK	Discussed MTD/MTS hearing books with BSS and emails re same.	0.2
2020.01.28	Perez 1	YOK	Continued working on opposition to motion to vacate (8.4), and call with SAB re same (.3).	8.7
2020.01.29	Perez 1	LTF	Reviewed draft opposition to motion to vacate judgment and discussed it with Yeremey Krivoshey.	1.6
2020.01.29	Perez 1	MCS	Inserted ToC into draft opposition to Motion to Vacate.	0.3
2020.01.29	Perez 1	SAB	Revised draft oppn to motion to vacate judgment (1.8); prep for Feb 26 hearing (2.4).	4.2
2020.01.29	Perez 1	YOK	Continued working on opposition to motion to vacate and drafted Krivoshey declaration in support.	7.4
2020.01.30	Perez 1	JMF	Prepared and sent books to SAB(.6); prepared books for YOK (.3).	0.9
2020.01.30	Perez 1	LTF	Reviewed and redlined revised draft of opposition to motion to vacate and exchanged emails with Yeremey Krivoshey regarding same (1.3); reviewed Scott Bursor's edits to opposition brief (.2).	1.5
2020.01.30	Perez 1	MCS	Put together books for SAB and sent to FL.	2.3
2020.01.30	Perez 1	SAB	Revised draft oppn to motion to vacate judgment (4.3).	4.3
2020.01.30	Perez 1	YOK	Reviewed LTF's and SAB's redlines to opposition to motion to vacate.	0.5
2020.01.31	Perez 1	JMF	Prepare books for YOK.	1.3
2020.01.31	Perez 1	JMF	Prepare books for YOK.	1
2020.02.01	Perez 1	SAB	Prep for Feb 26 hearing.	2.3
2020.02.01	Perez 1	SAB	Prep for Feb 26 hearing.	2.3
2020.02.02	Perez 1	SAB	Prep for Feb 26 hearing.	2.5
2020.02.02	Perez 1	SAB	Prep for Feb 26 hearing.	2.1
2020.02.03	Perez 1	YOK	Updated opposition to motion to vacate, and worked on Krivoshey declaration in support.	4.8
2020.02.04	Perez 1	DLS	Reviewed Krivoshey declaration and proposed order; finalized all documents; filed and emailed prop order to Judge.	1.6
2020.02.04	Perez 1	DLS	Prepared TOA; made formatting corrections.	1
2020.02.04	Perez 1	LTF	Discussed filing of opposition to motion to vacate judgment with Yeremey Krivoshey.	0.1
2020.02.04	Perez 1	YOK	Finalized and filed opposition to motion to vacate, krivoshey declaration in support, and proposed order, and discussed same with LTF, Debbie Schroeder, and Molly Sasseen.	7.7
2020.02.05	Perez 1	ASM	Sent chambers copies.	0.2
2020.02.05	Perez 1	JMF	Sent chambers copies.	0.7
2020.02.08	Perez 1	SAB	Prep for Feb 26 hearing.	2.2
2020.02.08	Perez 1	SAB	Prep for Feb 26 hearing.	2.3
2020.02.12	Perez 1	JMF	Prepared motion to vacate book for SAB and YOK.	1
2020.02.12	Perez 1	MCS	Sent draft of motion to vacate judgment book TOC to JMF for assembly.	0.2

2020.02.12	Perez 1	YOK	Reviewed D's reply ISO motion to vacate (.6), and discussed hearing re same with Judy Fontanilla and emailed SAB re same (.3).	0.9
2020.02.13	Perez 1	ASM	Assisted with making and shipping book for SAB.	0.5
2020.02.13	Perez 1	JMF	Prepared motion to vacate book for SAB.	3
2020.02.14	Perez 1	JMF	Prepared motion to vacate book for YOK.	1.5
2020.02.14	Perez 1	YOK	Emails with SAB re motion to vacate hearing.	0.1
2020.02.19	Perez 1	SAB	Prep for Feb 26 hearing.	3.6
2020.02.20	Perez 1	SAB	Prep for Feb 26 hearing.	3.5
2020.02.20	Perez 1	RSR	Booked hotel for SAB for 2/26 hearing (.1).	0.1
2020.02.21	Perez 1	SAB	Prep for Feb 26 hearing.	4.1
2020.02.22	Perez 1	SAB	Prep for Feb 26 hearing.	4
2020.02.23	Perez 1	SAB	Prep for Feb 26 hearing.	3.8
2020.02.24	Perez 1	SAB	Prep for Feb 26 hearing.	4.5
2020.02.25	Perez 1	BSS	Conf. w/ LTF re: hearing (0.2).	0.2
2020.02.25	Perez 1	LTF	Discussed hearing with Yeremey Krivoshey, Blair Reed, Brittany Scott and Fred Klorczyk.	0.6
2020.02.25	Perez 1	SAB	Prep for Feb 26 hearing (4.9); travel MIA to SF, prep for hearing en route (7.5).	12.4
2020.02.26	Perez 1	ASM	Put together book for YOK.	0.4
2020.02.26	Perez 1	BER	Reviewed briefing regarding motion to dismiss/strike.	0.8
2020.02.26	Perez 1	BER	Reviewed briefing regarding motion for attorneys' fees and motion to vacate judgement.	1.8
2020.02.26	Perez 1	BER	Traveled to Oakland and attended hearing on fee motion, motion to vacate judgement, and met with trial team afterwards.	3.3
2020.02.26	Perez 1	BSS	Traveled to Oakland and attended MTD and motion to strike hearing and met with team afterwards. (3.2).	3.2
2020.02.26	Perez 1	BSS	Traveled to Oakland and attended hearing on fee motion and motion to vacate judgment and met with trial team afterwards (3.3).	3.3
2020.02.26	Perez 1	LTF	Traveled to Oakland and attended MTD and motion to strike hearing and met with team afterwards.	3.2
2020.02.26	Perez 1	LTF	Traveled to Oakland and attended hearing on fee motion and motion to vacate judgment and met with trial team afterwards.	3.3
2020.02.26	Perez 1	SAB	Prep for hearing (5.0); attended hearing (2.4); team debrief re next steps after hearing (2.5).	9.9
2020.02.26	Perez 1	YOK	Prepped for hearings (5.2) and discussed same with LTF (.3), traveled to Oakland for hearing and met with SAB, LTF, BER, and BSS, attended hearings (2.5), met with SAB, LTF, BER, and BSS after the hearings in SF to discuss next steps and debrief, traveled back home following meeting (2.5).	10.5
2020.02.27	Perez 1	BSS	Conf. w/ LTF re: billing (0.1).	0.1
2020.02.27	Perez 1	LTF	Discussed fee hearing with CA attorneys and Joe Marchese.	0.6

2020.02.27	Perez 1	MCS	Discussed YGR requests from hearing w/ YOK and DLS, began compiling lodestar and detailed time entries.	3.1
2020.02.27	Perez 1	SAB	Travel SFO to FLL, analyzed lodestar en route (7.5).	7.5
2020.02.27	Perez 1	YOK	Research re distribution issue/TCPA common fund.	2.9
2020.02.28	Perez 1	DLS	Emailed Ms. Stone re court reporter; prepared transcript request and filed.	0.5
2020.02.28	Perez 1	MCS	Continued working on time entries.	0.8
2020.02.28	Perez 1	YOK	Analyzed 9th Circuit's Ramirez v. TransUnion LLC decision to determine whether to file notice of supplemental authority and discussed ordering transcript with Debbie Schroeder.	0.5
2020.02.29	Perez 1	SAB	Reviewed billing records for lodestar submission.	7.1
2020.03.01	Perez 1	SAB	Reviewed billing records for lodestar submission.	4.8
2020.03.02	Perez 1	SAB	Reviewed billing records for lodestar submission.	7.5
2020.03.02	Perez 1	YOK	Emailed SAB re transcript.	0.1
2020.03.03	Perez 1	LTF	Discussed case status at firm meeting and discussed time records and summary with Debbie Schroeder, Molly Sasseen and Yeremey Krivoshey.	0.4
2020.03.03	Perez 1	MCS	Finished compiling draft time entries and drafted updated lodestar, call with LTF, YOK and DLS re lodestar, sent lodestar to SAB, YOK, BER, LTF, and DLS.	4.3
2020.03.03	Perez 1	SAB	Analyzed hearing transcript and reviewed billing records for lodestar submission.	7.3
2020.03.03	Perez 1	YOK	Emailed LTF and SAB re transcript and reviewed transcript (.5), emailed LTF and MCS re lodestar (.1), call with LTF and MCS re lodestar (.2).	0.8
2020.03.04	Perez 1	MCS	Corrected all typos, capitalization errors, and punctuation errors in time entries.	6.2
2020.03.04	Perez 1	SAB	Analyzed Williams and Six Mexican Workers (1.8); reviewed billing records for lodestar submission (5.4).	7.2
2020.03.04	Perez 1	YOK	Call with SAB re research into motion for costs, and motion re lodestar (.2). Research re lodestar, costs, and class member distribution issues, and discussed same with BSS (7.8).	8
2020.03.05	Perez 1	MCS	Fixed remaining typos and errors, sent to YOK.	0.8
2020.03.05	Perez 1	SAB	Analyzed class member data concerning potential distribution of recovery to class members to address Judge Gonzalez-Rogers concerns expressed at the Feb. 26 hearing (2.7); reviewed billing records for lodestar submission (3.1).	5.8
2020.03.05	Perez 1	YOK	Emailed SAB re lodestar and class distribution issues, analyzed lodestar and research re fees and costs. Discussed billing issues with BSS.	8.1
2020.03.06	Perez 1	LTF	Discussed time records with Yeremey Krivoshey and Joel Smith.	0.1
2020.03.06	Perez 1	MCS	Updated lodestar to reflect changes to time entries.	0.3
2020.03.06	Perez 1	SAB	Analyzed billing records and case law for lodestar submission and drafted brief addressing court's concerns expressed at the Feb. 26 hearing.	4.8
2020.03.06	Perez 1	YOK	Calls with SAB re lodestar/fees issues, continued lodestar review and fees/costs research.	5.3

2020.03.07	Perez 1	SAB	Analyzed billing records and case law for lodestar submission and drafted brief addressing court's concerns expressed at the Feb. 26 hearing.	6.2
2020.03.08	Perez 1	SAB	Analyzed billing records and case law for lodestar submission and drafted brief addressing court's concerns expressed at the Feb. 26 hearing.	5.2
2020.03.09	Perez 1	DLS	Worked on Bill of Costs.	2
2020.03.09	Perez 1	MCS	Updated lodestar and time entries, reviewed email exchange between YOK and NJD re costs of appeal and administration in Starkist, began drafting 2 lodestars.	2.7
2020.03.09	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re proposed redactions to billing records (.4) Analyzed billing records and case law for lodestar submission and drafted brief addressing court's concerns expressed at the Feb. 26 hearing, including multiple videoconfs. w/ Y. Krivoshey re same (10.1).	10.5
2020.03.10	Perez 1	DLS	Continued to work on Bill of Costs; gathered receipts.	2.3
2020.03.10	Perez 1	MCS	Drafted 2 lodestars in the Starkist matter re appeal and administration, sent to YOK for review. Updated Rash lodestar and time entries, added new information to lodestar, sent to YOK. Reviewed local rules for in camera review with DLS.	3.4
2020.03.10	Perez 1	SAB	Drafted supplemental brief addressing court's concerns expressed at the Feb. 26 hearing and supplemental Bursor declaration concerning lodestar cross-check	14.7
2020.03.10	Perez 1	YOK	Worked on supplemental brief ISO fees motion with SAB, DLS, and MCS (5.5), and worked on bill of costs with DLS and MCS (1.0).	6.5
2020.03.11	Perez 1	DLS	Assisted with filing Bill of Costs and supplemental brief re fees.	5.7
2020.03.11	Perez 1	MCS	Made final changes to lodestar and time entries, finalized time entries, assisted with finalizing and filing bill of costs and supplemental brief re fees.	6
2020.03.11	Perez 1	SAB	Drafted supplemental brief addressing court's concerns expressed at the Feb. 26 hearing and supplemental Bursor declaration concerning lodestar cross-check	11.5
2020.03.11	Perez 1	YOK	Worked on and filed supplemental brief ISO fees motion and bill of costs.	8
2020.03.17	Perez 1	YOK	Emailed status update to Ninth Circuit mediator	0.4
2020.03.23	Perez 1	SAB	Corresp. w/ opposing counsel re objections to bill of costs	0.5
2020.03.23	Perez 1	YOK	Meet and confer emails with defense counsel re bill of costs and their supplemental brief re motion for attorney's fees.	0.4
2020.03.26	Perez 1	YOK	Reviewed defendant's filings re bill of costs and motion for attorney's fees and emailed SAB and LTF re same	1
2020.04.17	Perez 2	JIM	Reviewed and analyzed order on post-trial motions from Rash Curtis case, and confer with L. Fisher and S. Bursor about findings and impact on next steps	2.0
2020.04.17	Perez 2	LTF	Reviewed order on fees and motions to amend and vacate and discussed it with Scott Bursor, Yeremey Krivoshey, Debbie Schroeder and Blair Reed and circulated order to CA office.	1.8
2020.04.17	Perez 2	SAB	Analyzed order on post-trial motions from Rash Curtis case and potential impact on resolution of bad faith insurance claims; multiple teleconfs. w/ J. Marchese, Y. Krivoshey, and T. Fisher re same	2.3

2020.04.17	Perez 1	YOK	Analyzed order re fees and motions to vacate/reduce judgment, multiple calls with SAB and LTF re same.	2.3
2020.04.18	Perez 2	SAB	Analyzed order on post-trial motions from Rash Curtis case and potential impact on resolution of bad faith insurance claims; drafted email to team re same	3.8
2020.04.18	Perez 1	YOK	Reviewed SAB email re fee order and responded re same	0.2
2020.04.21	Perez 1	LTF	Discussed proposed judgment with Debbie Schroeder and Yeremey Krivoshey.	0.2
2020.04.21	Perez 1	YOK	Discussed proposed judgment with LTF (.2), and emailed Mr. Perez re recent order (.1). Drafted and circulated proposed judgment to SAB and LTF (1.0)	1.3
2020.04.22	Perez 2	JIM	Prepare for and participate in call with S. Bursor regarding next steps in litigation	1.2
2020.04.22	Perez 1	LTF	Discussed amended judgment with Yeremey Krivoshey and reviewed email to defendant's counsel regarding same.	0.1
2020.04.22	Perez 1	SAB	Revised draft proposed judgment (1.5); videoconf. w/ Y. Krivoshey re same (.5)	2.0
2020.04.22	Perez 1	YOK	Call with SAB re proposed judgment and emailed defense counsel re same	0.4
2020.04.23	Perez 2	SAB	Developed settlement strategy	3.0
2020.04.30	Perez 1	LTF	Reviewed amended judgment and email from Yeremey Krivoshey regarding same.	0.1
2020.04.30	Perez 1	YOK	Revised proposed form of judgment and emailed LTF and SAB re same	1.2
2020.05.01	Perez 1	DLS	Finalized joint status report and proposed form of judgment; filed and emailed proposed order to Judge	1
2020.05.01	Perez 1	LTF	Exchanged messages with Yeremey Krivoshey regarding amended judgment.	0.1
2020.05.01	Perez 1	YOK	Worked on joint statement, conferred with LTF and SAB re same, emails with defendant re same. Worked with Debbie Schroeder on finalizing and filing joint statement and the proposed form of judgment.	6.9
2020.05.02	Perez 2	SAB	Developed litigation and settlement strategy	3.0
2020.05.04	Perez 1	YOK	Reviewed final judgment and emailed SAB and LTF re same	0.2
2020.05.11	Perez 2	BSS	Reviewed and analyzed MTD opinion (0.3)	0.3
2020.05.11	Perez 2	LTF	Reviewed order on MTD and discussed it with Scott Bursor and reviewed email from Yeremey Krivoshey regarding same.	0.4
2020.05.11	Perez 2	YOK	Reviewed MTD/MTS order and emailed LTF and SAB re same	1
2020.05.12	Perez 2	LTF	Reviewed Law360 article regarding MTD decision.	0.1
2020.05.12	Perez 2	YOK	Reviewed Law360 article re MTD/MTS decision and emailed LTF and SAB re same	0.1
2020.05.12	Perez 1	YOK	Emailed class member re case update	0.1
2020.05.14	Perez 2	BSS	Researched and compiled model discovery and treatises (1.5)	1.5
2020.05.14	Perez 2	LTF	Reviewed bad faith research materials and exchanged messages with Brittany Scott and Yeremey Krivoshey regarding same and reviewed emails from Scott Bursor regarding same.	0.3
2020.05.14	Perez 2	SAB	Developed litigation strategy and began developing discovery strategy	1.7
2020.05.14	Perez 2	YOK	Research with BSS re discovery strategy (.4), emailed LTF, SAB, and BSS re case update and scheduling issues (.2)	0.6

2020.05.15	Perez 2	BSS	Research Indian Harbor Financial statements (1); Created financial conditions folder (0.1)	1.1
2020.05.15	Perez 2	LTF	Reviewed emails regarding insurance and financial statements.	0.2
2020.05.15	Perez 2	SAB	Developed initial RFPs and Rogs	2.3
2020.05.15	Perez 2	YOK	Research re Indian Harbor's financials and emailed SAB, BSS, and LTF re same	1.3
2020.05.17	Perez 2	SAB	Revised draft amended complaint	1.9
2020.05.17	Perez 2	YOK	Worked on amended complaint and redacted exhibits thereto, and emailed SAB and LTF re same.	2.1
2020.05.18	Perez 2	DLS	Reviewed, made edits and filed amended complaint	0.9
2020.05.18	Perez 2	SAB	Revised draft amended complaint and exhibits	2.4
2020.05.18	Perez 2	YOK	Finalized and filed amended complaint, and emailed defense counsel re same	0.8
2020.05.20	Perez 2	SAB	Analyzed expert reports (6.7); videoconf. w/ D. Frangiamore, L. Kornfeld, et al. re expert rebuttal strategy (1.9)	8.6
2020.05.26	Perez 2	YOK	Reviewed Defendant's motion re interlocutory appeal	0.4
2020.05.28	Perez 2	SAB	Analyzed litigation funding proposals	3.0
2020.05.28	Perez 2	YOK	Worked on response to Defendant's motion re interlocutory appeal and emailed Debbie Schroeder re same.	3.8
2020.05.28	Perez 1	YOK	Emailed SAB re response to 9th circuit mediator	0.1
2020.05.29	Perez 2	LTF	Email exchange with Yeremey Krivoshey regarding mediation request.	0.1
2020.05.29	Perez 2	SAB	Analyzed Defendant's motion to certify interlocutory appeal of order denying MTD (3.0)	3.0
2020.05.29	Perez 2	YOK	Reviewed mediation email from defense counsel and emailed LTF and SAB re same. Research re Barr v. AAPC's effect on mediation and RCA case.	1.9
2020.05.29	Perez 1	YOK	Reviewed mediation email from Ninth Circuit mediator and emailed SAB re same.	0.1
2020.05.30	Perez 2	LTF	Email exchange with Yeremey Krivoshey and Scott Bursor re: mediators and research regarding potential mediators.	0.7
2020.05.30	Perez 2	SAB	Analyzed litigation funding proposals	3.5
2020.05.30	Perez 2	YOK	Emailed PLF and JIM re mediation. Emails with SAB and LTF re mediation and investigation re same.	0.5
2020.05.31	Perez 2	SAB	Developed discovery strategy	3.1
2020.06.01	Perez 2	SAB	Analyzed litigation funding proposals (2.1); teleconf. w/ [REDACTED] (1.1); teleconf. w/ [REDACTED] (1.2)	4.5
2020.06.01	Perez 2	YOK	Analyzed answer and research re same, and emailed SAB re same (.6). Continued working on oppositio nto opp. to D's motion re certification of appeal (1.0).	1.6
2020.06.02	Perez 2	LTF	Reviewed email from defendant's counsel regarding mediator and researched Bruce Friedman and circulated bio to Scott Bursor and Yeremey Krivoshey.	0.2
2020.06.02	Perez 2	SAB	Analyzed D's answer and affirmative defenses (1.4); corresp. w/ P. Daniel Bond re litigation funding issues (1.3); videoconf. w/ Y. Krivoshey re discovery strategy and mediation strategy (.4)	3.1
2020.06.02	Perez 2	YOK	Reviewed defendant's email re mediation and call with SAB re same.	0.2



2020.06.03	Perez 2	BSS	Conf. w/ YOK re: discovery requests (0.1); Drafted discovery requests (3.1)	3.2
2020.06.03	Perez 2	SAB	Developed strategy for mediation, settlement negotiations, and upcoming 26f conference (3.5); videoconf. w/ Y. Krivoshey re same (.4)	3.9
2020.06.03	Perez 2	YOK	Call with SAB re discovery, 26(f), and mediation, call with BSS re discovery.	0.3
2020.06.03	Perez 1	YOK	Emailed 9th Circuit mediator and defense counsel re mediation call and mediation.	0.2
2020.06.04	Perez 2	BSS	Drafted discovery requests (1) ; Conf. w/ YOK re: same (0.1)	1
2020.06.04	Perez 2	SAB	Mediation prep	4.3
2020.06.04	Perez 2	YOK	Revised RFPs and ROGs, discussed same with BSS, and emailed SAB re same. Emails with SAB and LTF re mediation and emailed defense counsel re same. Emailed defense counsel re 26(f) conference.	2.2
2020.06.05	Perez 2	SAB	Prep for mediation (2.5); teleconf. w/ [REDACTED] (.4); revised draft discovery requests (2.2)	5.1
2020.06.05	Perez 2	YOK	Emails re mediation and 26(f) call. Continued working on opposition to motion to certify and motion to stay.	3.6
2020.06.06	Perez 2	SAB	Mediation prep	3.0
2020.06.07	Perez 2	SAB	Mediation prep	3.2
2020.06.07	Perez 2	YOK	Worked on opposition to D's motion for interlocutory appeal	4.9
2020.06.08	Perez 2	BSS	Reviewed email re: revised discovery (0.1); Reviewed email re: RFAs (0.1); Drafted RFAS (0.2)	0.4
2020.06.08	Perez 2	DLS	Prepared proof of service; finalized and served discovery	0.4
2020.06.08	Perez 2	DLS	Filed notice of interested parties	0.4
2020.06.08	Perez 2	LTF	Reviewed emails regarding 26(f) conference, discovery and mediation and exchanged messages with Yeremey Krivoshey and Fred Klorczyk regarding mediation.	0.4
2020.06.08	Perez 2	MCS	Drafted and finalized ADR Cert, finalized notice of interested parties	2
2020.06.08	Perez 2	SAB	Prep for 26f conference including multiple videoconfs. w/ Y. Krivoshey and revisions to draft doc requests and interrogatories (4.3); teleconf. w/ Max Stern & Y. Krivoshey re Rule 26f conference (1.1); videoconf. w/ Y. Krivoshey to debrief after 26f conference and discuss next steps (.4)	5.8
2020.06.08	Perez 2	YOK	Calls with SAB re discovery, mediation, opposition to motion for interlocutory appeal, 26(f) conference, certificate of interested parties, and ADR certification. Worked on RFPs, ROGs, and RFAs and emails with BSS, SAB, and Debbie Schroeder re same. Participated on 26(f) call with SAB and defense counsel. Continued working on opposition to Defendant's motion for interlocutory appeal and emailed draft to SAB.	6.8
2020.06.09	Perez 2	DLS	Finalized and file notice of change of address	0.4
2020.06.09	Perez 2	DLS	Prepared tables; finalized and filed opposition brief	1.3
2020.06.09	Perez 2	JGM	Preparation and Review of Notice of Change of Address for SAB	0.8
2020.06.09	Perez 2	JGM	Preparation and Review of Notice of Change of Address for SAB	0.8
2020.06.09	Perez 2	LTF	Reviewed opposition to motion to certify order for appeal.	0.3
2020.06.09	Perez 2	MCS	Fixed formatting and finalized notice of change of address, filed.	1.3

2020.06.09	Perez 2	SAB	Prep for mediation (2.5); revised draft oppn to motion for interlocutory appeal (1.3)	3.8
2020.06.09	Perez 2	YOK	Emailed mediator re mediation and research re mediation issues. Continued working, finalized, and filed opposition to Defendant's motion for interlocutory appeal.	6.8
2020.06.10	Perez 2	DLS	Updated SAB letterhead	0.3
2020.06.10	Perez 2	SAB	Mediation prep	5.1
2020.06.10	Perez 2	YOK	Drafted plaintiff's mediation letter and discussed same with SAB. Reviewed Defendant's mediation statement and research re same.	5.3
2020.06.11	Perez 2	BSS	Reviewed email re: research assignment (0.1)	0.1
2020.06.11	Perez 2	SAB	Mediation prep	5.3
2020.06.11	Perez 2	YOK	Drafted memo re mediation and sent to SAB, BSS, and LTF.	4.3
2020.06.12	Perez 2	LTF	Exchanged messages with Yeremey Krivoshey regarding mediation.	0.3
2020.06.12	Perez 2	SAB	Prep for and attend mediation	6.3
2020.06.12	Perez 2	YOK	Prepared for and participated in mediation. Discussed same with SAB, LTF, and Phil Fraietta. Strategized re next steps.	4
2020.06.13	Perez 2	SAB	Analyzed reinsurance issues and financial condition of Indian Harbor	3.7
2020.06.13	Perez 2	YOK	Emailed SAB re 26(f) report, protective order, ESI protocol, and mediation.	0.2
2020.06.14	Perez 2	YOK	Reviewed email and brief sent by SAB re relationship between Indian Harbor and XL	0.5
2020.06.15	Perez 1	DLS	Discussed appellate transcript w YOK	0.3
2020.06.15	Perez 2	LTF	Discussed mediation with Yeremey Krivoshey and reviewed research regarding reinsurance.	0.4
2020.06.15	Perez 2	YOK	Call with LTF re mediation.	0.1
2020.06.18	Perez 2	YOK	Drafted 26(f) report and emailed SAB and defense counsel re same. Worked on protective order and ESI protocol with BER.	3.3
2020.06.19	Perez 2	JIM	Attention to litigation strategy and next steps and confer with S. Bursor about same	2.0
2020.06.22	Perez 2	DLS	Filed protective order	0.4
2020.06.22	Perez 2	YOK	Drafted, finalized and serve Plaintiff's initial disclosures and discussed same with SAB and Debbie Schroeder. Reviewed Defendant's initial disclosures.	1.8
2020.06.23	Perez 2	DLS	Fixed formatting of CMC Statement	0.5
2020.06.23	Perez 2	JIM	Telephone call with S. Bursor regarding litigation strategy, defendant's initial disclosures and upcoming 26f report	0.8
2020.06.23	Perez 2	SAB	Revised draft Rule 26f report (.8); videoconf. w/ Y. Krivoshey re same (.3); analyzed D's initial disclosures (1.4); negotiated [REDACTED] (2.5)	5.0
2020.06.23	Perez 2	YOK	Reviewed defendant's reinsurance/insurance production and emailed SAB and Debbie Schroeder re same. Discussions with Debbie Schroeder re French translation of the production.	0.4
2020.06.23	Perez 2	YOK	Worked on joint statement and discussed same with Debbie Schroeder	2.7
2020.06.24	Perez 2	YOK	Email with Debbie Schroeder re translation of insurance docs	0.1
2020.06.25	Perez 2	SAB	Negotiated [REDACTED] (3.5); teleconf. w/ [REDACTED] re same (.5)	4.0

2020.06.29	Perez 2	DLS	Filed CMC Statement	0.4
2020.06.29	Perez 2	SAB	Analyzed draft 26f report and initial disclosures	3.5
2020.06.29	Perez 2	YOK	Edited, finalized and filed joint report. Calls with SAB and Debbie Schroeder re same. Emails with defense counsel re same. Call and email with mediator's assistant re mediation and discussed same with SAB.	2.7
2020.07.02	Perez 2	LTF	Reviewed Judge Gonzalez Rogers case calendar and exchanged messages with Yeremey Krivoshey and summer associates regarding 7/6 hearing procedures (.3); discussed case filing issues with Debbie Schroeder (.2).	0.5
2020.07.02	Perez 2	YOK	Discussed CMC and motion to stay hearing with LTF and reviewed procedures for zoom appearances. Emailed defense counsel re discovery extension request.	0.4
2020.07.06	Perez 2	LTF	Attended CMC and hearing on motion to certify MTD order for immediate appeal.	0.5
2020.07.06	Perez 2	SAB	Reviewed reinsurance agreements (3.3); prep for CMC (1.8); attended CMC by zoom (.8); videoconf. w/ Y. Krivoshey to debrief and discuss next steps (.8)	6.7
2020.07.06	Perez 2	YOK	Reviewed Barr TCPA ruling, prepped for case management conference and hearing re motion to certify MTD order, attended hearing, discussed same with SAB.	4.1
2020.07.07	Perez 2	SAB	Developed litigation strategy	2.4
2020.07.09	Perez 2	DLS	Prepared and filed transcript request; contacted court reporter re transcript	0.7
2020.07.09	Perez 2	LTF	Discussed transcript request with Debbie Schroeder and cut a check for it.	0.1
2020.07.09	Perez 2	SAB	Analyzed IH's arguments identified in Rule 26(f) report and reviewed documents and chronology of events relating to same	5.4
2020.07.09	Perez 2	YOK	Reviewed RCA/mediation productions and staregized re discovery. Discussed same with SAB.	2.8
2020.07.13	Perez 2	SAB	Analyzed insurance / reinsurance and related issues	5.5
2020.07.14	Perez 2	YOK	Reviewed D's notices of subpoenas and emailed defense counsel re same.	0.2
2020.07.15	Perez 2	DLS	Prepared and filed transcript request	0.4
2020.07.15	Perez 2	LTF	Reviewed minute order following discovery hearing and exchanged messages with Yeremey Krivoshey regarding same.	0.1
2020.07.15	Perez 2	SAB	Analyzed D's 3d party subpoenas (1.2); prep for and attend hearing w/ Magistrate Judge Hixson (3.5); videoconf. w/ Y. Krivoshey re same (.7)	5.4
2020.07.15	Perez 2	YOK	Prepped for discovery hearing, call with SAB re same, participated in hearing, and messaged LTF re same.	1.3
2020.07.16	Perez 2	SAB	Analyzed initial disclosures, 3d party subpoenas, and developed discovery strategy	3.7
2020.07.20	Perez 2	BSS	Reviewed email re: insurance books (0.1)	0.1
2020.07.20	Perez 2	SAB	Analyzed D's amended initial disclosures (1.2); Prep for and attend meet & confer call re discovery disputes (3.3)	4.5
2020.07.20	Perez 2	YOK	Reviewed Defendant's insurance docs and drafted TOC for book re same for SAB and emailed Erin Wald re same.	2.3
2020.07.21	Perez 2	EMW	Assisted w. organizing defendants' document production (.9)	0.9
2020.07.21	Perez 2	LTF	Reviewed draft letter brief regarding deposition dispute.	0.2

2020.07.24	Perez 2	SAB	Drafted joint discovery letter (3.7); developed litigation strategy (5.3)	9.0
2020.07.24	Perez 2	YOK	Reviewed and edited discovery letter brief, call with SAB re same, and emailed redlines to all counsel.	2
2020.07.27	Perez 2	JGM	Call and relay message to SAB	0.2
2020.07.27	Perez 2	LTF	Reviewd order on deposition discovery dispute.	0.1
2020.07.27	Perez 2	SAB	Prep for tomorrow's Project Harbor call (2.5); analyzed D's document requests and prep for document production (2.6); teleconf. w/ A. Griffith re D's subpoena to Rash Curtis (.3); videoconf. w/ Y. Krivoshey re same (.3); conf. w/ R. Richter re document and ESI search protocols (.4)	6.1
2020.07.27	Perez 2	YOK	Reviewed order re discovery dispute.	0.1
2020.07.28	Perez 2	SAB	Zoom videoconf. w/ [REDACTED], and his due diligence team, [REDACTED] (1.0); analyzed discovery correpondence re document production and ESI protocol (1.5); videoconf. w/ Y. Krivoshey & R. Richter re searchinig for responsive documents (.8)	3.3
2020.07.28	Perez 2	YOK	Call with SAB re gathering plaintiffs production and privilege log. Worked on plaintiffs' production and review. Emailed defense counsel re ESI protocol and production issues.	4.3
2020.07.28	Perez 2	RSR	Assist with SAB email doc production (1.4)	1.4
2020.07.29	Perez 2	SAB	Document search logistics (2.3)	2.3
2020.07.30	Perez 2	SAB	Document search and review logistics, and began document review	4.5
2020.07.30	Perez 2	RSR	Conf. w/ SAB and YOK re doc production due 8/7 Assist with doc production due 8/7and began compiling SAB emails (2.8)	2.8
2020.07.31	Perez 2	LTF	Discussed document production with Scott Bursor, Yeremey Krivoshey and Rebecca Richter.	0.3
2020.07.31	Perez 2	SAB	Developed strategy for responding to document requests, videoconf. w/ T. Fisher and Y. Krivoshey re same, and document review	4.2
2020.07.31	Perez 2	YOK	Discussed doc review/production with LTF and SAB. Worked on discovery responses/production issues.	1.2
2020.07.31	Perez 2	RSR	Continue assisting with doc production (11.3)	11.3
2020.08.01	Perez 2	RSR	Check in with doc production printers (.1)	0.1
2020.08.03	Perez 2	EMW	Assist w. doc. Production due 08/07 (1.8)	1.8
2020.08.03	Perez 2	JMF	Prepared discovery response templates.	1
2020.08.03	Perez 2	LTF	Discussed document production and mediations with Scott Bursor.	0.2
2020.08.03	Perez 2	YOK	Worked on gathering production, and reviewing same. Revised ESI Protocol and emailed SAB re same. Discussed production issues with SAB. Drafted privilege log and emailed Rebecca Richter re same.	5.6
2020.08.03	Perez 2	RSR	Assist with doc production due 8/7 (1.8)	1.8
2020.08.04	Perez 2	DLS	Discussed production with YOK	0.2
2020.08.04	Perez 2	EMW	Assisted w. doc. Production due 08/07 (5)	5
2020.08.04	Perez 2	LTF	Discussed document production with Scott Bursor.	0.1
2020.08.04	Perez 2	SAB	Document review	12.5

2020.08.04	Perez 2	YOK	Drafted plaintiff's discovery responses and emailed SAB re same. Call with SAB re production strategy. Continued gathering docs for production.	5.2
2020.08.04	Perez 2	RSR	Assisted with doc production due 8/7	8.5
2020.08.05	Perez 2	SAB	Document review; revised draft response to D's RFPs, revised draft ESI protocol	12.1
2020.08.05	Perez 2	YOK	Calls with SAB and Rebecca Richter re production issues. Continued assembling docs for production, and drafted cover letter re production. Went to FedEx to ship copy of production to SAB.	5.6
2020.08.05	Perez 2	RSR	Continued assisting with doc production due 8/7 (8.5)	8.5
2020.08.06	Perez 2	DLS	Discussed production with YOK and RSR	0.2
2020.08.06	Perez 2	DLS	Prepared proof of service for RFP responses	0.2
2020.08.06	Perez 2	SAB	Document production, privilege log, and related matters (5.3); legal research re potential liability for bad faith refusal to settle in the absence of a formal settlement demand (4.4)	9.7
2020.08.06	Perez 2	RSR	Continued assisted with doc production due 8/7 (2.3)	2.3
2020.08.07	Perez 2	EMW	Assisted w. Doc. Production due 08/07 (.5)	0.5
2020.08.07	Perez 2	LTF	Discussed discovery responses with Yeremey Krivoshey (.1); reviewed responses from defendants (.2); reviewed email from Scott Bursor regarding claim evaluation (.2).	0.5
2020.08.07	Perez 2	SAB	Revised draft ESI protocol, doc production indexes, priv log, and initial document production (10.5); legal research re potential liability for bad faith without formal settlement demand and email to [REDACTED] re same (2.7)	13.2
2020.08.07	Perez 2	YOK	Reviewed SAB research re claim evaluation and emailed him re same. Discussion re same and discovery issues with LTF. Reviewed SAB's edits to discovery responses and worked on finalizing same, call with SAB re same. Worked on cover letter for Plaintiff's production. Organized Plaintiff's production and discussed same with SAB.	4
2020.08.07	Perez 1	YOK	Emailed 9th Circuit mediator re case update and briefing scheduling.	0.3
2020.08.07	Perez 2	RSR	Assist with doc production due today (1.5)	1.5
2020.08.10	Perez 2	EMW	Confer w. SAB and RSR re supp. Production (.6) Assisted w. organizing supp. Production (1.2)	1.8
2020.08.10	Perez 2	JGM	Call and transfer to SAB	0.1
2020.08.10	Perez 2	SAB	Conf. w/ R. Richter & E. Wald re searching B&F box file for responsive documents (.3); email to [REDACTED] re 3d party privilege claims (.2); email to Amanda Griffith re Rash Curtis priv claims (.2); multiple confs. w/ R. Richter, E. Wald, and Y. Krivoshey re Plf's supplemental doc production (2.2); analyzed D's discovery responses and reviewed documents IHIC 000296-758 (5.1); teleconf. w/ A. Griffith re Rash Curtis's subpoena response and potential privilege claims (.6)	8.6
2020.08.10	Perez 2	YOK	Drafted meet and confer email re production and protective order, and discussed same with SAB. Reviewed Defendant's production and emailed SAB re same.	1.4
2020.08.10	Perez 2	RSR	Conf. w/ SAB and EMW re supplemental production and assisted with same (4.8)	4.8
2020.08.11	Perez 2	MCS	Created ROG response template, sent to YOK	1.7

2020.08.11	Perez 2	SAB	Supplemental doc production IH Perez 0019208-0040190 and related matters (8.5); [REDACTED] (.3)	8.8
2020.08.11	Perez 2	YOK	Worked on interrogatory responses and discussed same with SAB and Debbie Schroeder. Continued doc review.	3.3
2020.08.11	Perez 2	RSR	Assist with Plaintiff's supp. doc production (2.2)	2.2
2020.08.12	Perez 2	SAB	Document review and discovery strategy	2.6
2020.08.13	Perez 2	LTF	Reviewed emails regarding discovery issues.	0.1
2020.08.13	Perez 2	SAB	Analyzed Indian Harbor's discovery responses (4.4); teleconf. w/ A. Griffith re Rash Curtis's subpoena response (.3); drafted email to Max Stern re response to Plf's Interrogatory No. 16 (.3)	5.0
2020.08.13	Perez 2	YOK	Finished draft of interrogatory responses and emailed SAB re same.	3.2
2020.08.14	Perez 2	JGM	Save Doc to Box - Motion, 1 files	0.1
2020.08.14	Perez 1	MCS	Drafted, finalized, and filed transcript order.	1.7
2020.08.14	Perez 2	SAB	Drafted rog responses (1.7); revised draft ESI protocol (.9); telephonic meet & confer re discovery and ESI protocol w/ Max Stern, Jessica Lalonde & Y. Krivoshey (1.1)	3.7
2020.08.14	Perez 1	YOK	Emailed Debbie Schroeder re transcript request. Reviewed Visalus TCPA order and emailed SAB and LTF re same.	0.5
2020.08.17	Perez 2	MCS	Finalized ROG responses, drafted and finalized YOK verification, added signature to YOK verification and attached to responses. Sent to YOK and SAB for review.	1.3
2020.08.17	Perez 2	YOK	Finalized and served plaintiff's interrogatory responses and Krivoshey verification, emails with SAB re same.	0.7
2020.08.18	Perez 2	SAB	Document review, revised draft ESI protocol, developed discovery strategy	5.1
2020.08.18	Perez 2	YOK	Revised ESI protocol and emailed SAB re same.	0.8
2020.08.18	Perez 2	RSR	Download and save defendant's doc production (.4); update doc production log (.2); conf. w/ SAB re same (.3)	0.9
2020.08.19	Perez 2	SAB	Revised draft ESI protocol and developed discovery strategy	2.7
2020.08.19	Perez 2	YOK	Reviewed defendant's changes to ESI protocol, updated and finalized document, and sent back to defense counsel. Discussed same with SAB.	1
2020.08.19	Perez 2	RSR	Downloaded Exhibit 9 of RCA doc production and saved to webdrive (.5); updated doc production log (.1)	0.6
2020.08.20	Perez 2	DLS	Made edits; added attestation; finalized and filed ESI protocol; emailed to Judge	0.9
2020.08.20	Perez 2	YOK	Finalized ESI protocol and assisted with filing. Emailed defense counsel and discussed same with SAB.	0.3
2020.08.21	Perez 2	SAB	[REDACTED] (.4); document review and developed discovery strategy (3.2); revised draft CMC statement (1.2)	4.8
2020.08.21	Perez 2	YOK	Drafted CMC statement and emailed SAB and defense counsel re same.	2
2020.08.24	Perez 2	DLS	Fixed footer; finalized and filed CMC statement	0.4
2020.08.24	Perez 2	SAB	Document review and discovery strategy	4.3

2020.08.24	Perez 2	YOK	Reviewed defendant's edits to CMC statement, finalized statement and discussed same with SAB and Debbie Schroeder.	1
2020.08.24	Perez 2	RSR	Conf. w/ SAB re supplemental search terms and ran email search (.8)	0.8
2020.08.25	Perez 2	SAB	Document review and discovery strategy (3.3); executed [REDACTED] re potential litigation financing (.3)	3.6
2020.08.25	Perez 2	YOK	Call with SAB re privilege research and research re same.	0.2
2020.08.25	Perez 2	RSR	Assisted with supplemental production (1.4)	1.4
2020.08.26	Perez 2	SAB	Document review and developed strategy for responding to M. Stern's meet & confer email (3.2); research re joint interest and joint prosecution privileges (2.5)	5.7
2020.08.26	Perez 2	YOK	Research re common interest privilege and emailed SAB re same.	0.7
2020.08.26	Perez 2	YOK	Emailed defense counsel re ESI protocol and discussed same with Debbie Schroeder.	0.1
2020.08.26	Perez 2	RSR	Conf. w/ SAB re doc review and production (.1); printed RCA doc production for SAB review (.7)	0.8
2020.08.27	Perez 2	SAB	Document review and analyzed joint interest privilege for communications with Assignor's counsel (4.3);	4.3
2020.08.28	Perez 2	SAB	Document review of RCA's third party production (3.5); [REDACTED] re potential litigation financing, and sent followup emails as requested during the call (2.4); [REDACTED] re potential litigation financing and sent followup emails as requested during th call (2.1)	8.0
2020.08.31	Perez 2	JGM	Scan Document and send to SAB, YOK	0.2
2020.08.31	Perez 2	JGM	Mail USB Drive to RSR	0.2
2020.08.31	Perez 2	SAB	Prep for CMC hearing (2.5); attended CMC hearing via Zoom (.6); document review of RCA's third party production (2.2)	5.3
2020.08.31	Perez 2	YOK	Prepped for and participated on CMC. Call after with SAB re same.	1.4
2020.08.31	Perez 2	RSR	Saved RCA doc production cover letter and conf. w/ JGM re USB mailing (.1)	0.1
2020.09.01	Perez 2	SAB	Email corresp. w/ M. Stern re 3d party subpoenas (.2); review of RCA docs (3.5)	3.7
2020.09.02	Perez 2	RSR	Download, save, and print defendant doc production (1.6); update doc production log (.1); conf. w/ SAB and G. Habor re e-discovery hosting (.2)	1.9
2020.09.04	Perez 2	EMW	Worked w. JND re uploading production (1)	1
2020.09.08	Perez 2	LTF	Relativity training and follow up discussion with Scott Bursor regarding next steps in the case.	1.2
2020.09.08	Perez 2	SAB	Videoconf. w/ G. Haber, D. Olson, T. Fisher, Y. Krivoshey and R. Richter re Relativity training and document review strategy (1.3); teleconf. w/ [REDACTED] re potential litigation funding (1.1); document review (1.5)	3.9
2020.09.08	Perez 2	YOK	Participated in relativity training, and discussions with LTF and SAB re next steps. Doc review.	2
2020.09.08	Perez 2	RSR	Relativity training (1.1); conf. w/ SAB and update Doc Production Log (.1); emailed D. Olson from JND re new doc production upload (.2)	1.4

2020.09.09	Perez 2	SAB	Multiple confs. w/ R. Richter re setting up Relativity databases and doc review procedures (.7); doc review of WSBC 001-294 docs (2.5);	3.2
2020.09.09	Perez 2	RSR	Saved doc production cover letter and updated production log (.2); download production and save to webdrive (.2); conf. w/ D. Olson re conversion/OCR/upload of previous productions (.4); conf. w/ SAB re same (.1); zip previous productions and send via hightail to D. Olson (.8); prepared priv log book for SAB (.3); bates stamp priv docs and update log (.8)	2.8
2020.09.10	Perez 2	RSR	Follow up with D. OLSON re status of production processing and upload (.2); updated Doc Production log with IHIC custodian info (.3)	0.5
2020.09.11	Perez 2	RSR	Download and save D&L production (.1); send production to JND for Relativity upload (.1); conf. w/ D. Olson re production conversion/upload status and email SAB re same (.2); update doc production log (.2); update privilege log binder for SAB (.2)	0.8
2020.09.14	Perez 2	RSR	Conf. w/ D. Olson re bate stamping project (.2); download & save IHIC 5th production and send to JND for Relativity upload (.3); saved cover letter and updated doc production log (.1)	0.6
2020.09.15	Perez 2	SAB	Call w/ D. Spiegel and J. Lula re potential litigation finance transaction	0.8
2020.09.16	Perez 2	SAB	Doc review and discovery strategy	4.3
2020.09.17	Perez 2	RSR	Conf. w/ JND re production upload (.1); download and save new production (0.5); save cover letter and update doc productio log (0.2)	0.8
2020.09.21	Perez 2	SAB	Document review	1.3
2020.09.21	Perez 2	RSR	Conf. w/ D. Olson re plaintiff's production/RCA production coding (.2); review relativity for coding updates (.5)	0.7
2020.09.22	Perez 2	RSR	Review Relativity files and email with D. Olson re same (.4)	0.4
2020.09.23	Perez 2	YOK	Doc review	1
2020.09.24	Perez 2	SAB	Document review and developed strategy for discovery	2.3
2020.09.29	Perez 2	SAB	Analyzed insurance application documents and other document review	5.1
2020.09.29	Perez 2	YOK	Doc review, and research for memo re Defendant's defense re misrepresentation.	2
2020.09.29	Perez 2	RSR	Review email from SAB and conf. w/ D. Olson re production search terms and document folders (0.6)	0.6
2020.09.30	Perez 2	SAB	Analyzed documents concerning settlement communications with the mediator Doug deVries and Adam Williams, including multiple confs. w/ R. Richter re same	5.3
2020.09.30	Perez 2	YOK	Messaged SAB re privilege log and investigation re same. Continued research re memo re misrepresentation defense.	2.2
2020.09.30	Perez 2	RSR	Review Relativity coded project and email D. Olson re same (1.2); conf. w/ SAB re doc review (.7); emails with D. Olson re doc review (.1); reviewed documents for 9/2017 and 2/2018 emails (.8)	2.8
2020.10.01	Perez 2	YOK	Drafted and circulated memo on misrepresentation defense.	3.1
2020.10.01	Perez 2	RSR	Conf. w/ D. Olson re doc review assignment and Relativity field set up (.4)	0.4
2020.10.02	Perez 2	RSR	Continued working with JND re document coding and review (2); conf. w/ SAB re same (.1)	2.1



2020.10.05	Perez 2	SAB	Email corresp w/ [REDACTED] re collectability of judgment against Indian Harbor alone without parent co. XL (1.2); analyzed potential misrepresentation defense and Y. Krivoshey legal research memo re same (2.5)	3.7
2020.10.06	Perez 2	JGM	Print Docs for SAB	0.2
2020.10.06	Perez 2	SAB	Analyzed Indian Harbor privilege logs	1.5
2020.10.06	Perez 2	RSR	Reviewed IHIC Priv log and conf. w/ SAB re same (.3)	0.3
2020.10.08	Perez 2	YOK	Worked on discovery research for SAB and wrote memorandum/email re obtaining docs re financial condition.	2.6
2020.10.09	Perez 2	RSR	Reviewed defense counsel email regarding Plaintiff's 8/7 Production and emailed SAB and D. Olson re same (.3)	0.3
2020.10.16	Perez 2	SAB	Negotiations w/ [REDACTED] re potential litigation funding deal	4.0
2020.10.20	Perez 2	YOK	Emailed defense counsel re production issue.	0.1
2020.10.20	Perez 1	YOK	Reviewed new scheduling re appellate briefing and emailed SAB re same.	0.2
2020.10.23	Perez 2	BSS	Reviewed email re: meet and confer scheduling (0.1); Drafted interrogatories set 2 (0.4); Conf. w/ LTF re: same (0.1); Conf. w/ DLS re: service of ROGS (0.2); Updated case calendar (0.1)	0.9
2020.10.23	Perez 2	DLS	Made edits to interrogatories and served	0.4
2020.10.23	Perez 2	LTF	Reviewed emails regarding second set of interrogatories, reviewed draft interrogatories and exchanged messages with Brittany Scott regarding same.	0.3
2020.10.23	Perez 2	SAB	Developed discovery strategy (3.5); videoconf. w/ Y. Krivoshey re same (.3); drafted interrogatory no. 17 (.5); drafted meet & confer email re interrogatory no. 16 (.9)	5.2
2020.10.23	Perez 2	YOK	Emails with SAB and BSS and LTF re serving supplemental interrogatory. Reviewed draft interrogatory and emailed BSS re same.	0.5
2020.10.23	Perez 1	YOK	Emailed defense counsel re stipulation to supplement appeal and discussed same with SAB.	0.2
2020.10.24	Perez 2	SAB	Developed discovery strategy	4.1
2020.10.25	Perez 2	SAB	Developed discovery strategy and analyzed proposed litigation finance terms	4.2
2020.10.29	Perez 2	SAB	Teleconf. w/ [REDACTED] re potential litigation funding due diligence on bad faith claim (.6)	0.6
2020.10.30	Perez 2	SAB	Read Defendant's premotion SJ letter	0.5
2020.10.30	Perez 2	YOK	Reviewed defendant's MSJ premotion letter brief, research re same, and emailed LTF and SAB re same.	1.4
2020.10.30	Perez 1	YOK	Emailed defense counsel re stipulation and reviewed same.	0.2
2020.10.31	Perez 2	SAB	Analyzed Defendant's premotion SJ letter and authorities cited therein; multiple email to Y. Krivoshey et al re same, and legal research re misrepresentation defense	5.8
2020.10.31	Perez 2	YOK	Emails with SAB re response to premotion MSJ letter and research re same.	0.8
2020.11.01	Perez 2	LTF	Reviewed emails from Scott Bursor and Yeremey Krivoshey regarding response to pre-motion letter.	0.2

2020.11.01	Perez 2	SAB	Analyzed Defendant's premotion SJ letter and legal research re response (6.5); videoconf. w/ Y. Krivoshey re same (.9)	7.4
2020.11.01	Perez 2	YOK	Edited memo re misrepresentation defense and assisted SAB with pre-motion response.	5.8
2020.11.02	Perez 2	MCS	Pulled cases from westlaw, saved to box.	1.2
2020.11.02	Perez 2	SAB	Drafted response to Defendant's premotion SJ letter (9.5); videoconf. w/ [REDACTED] (1.5)	11.0
2020.11.02	Perez 2	YOK	Doc review of IHIC and RCA productions. Continued research and assistance with response to pre-motion letter and discussions with SAB re same.	8.3
2020.11.03	Perez 2	BSS	Reviewed and revised summary judgment premotion letter response (0.3)	0.3
2020.11.03	Perez 2	JGM	Print Documents for SAB	0.2
2020.11.03	Perez 2	JGM	Save Doc to Box - 9 Files	0.1
2020.11.03	Perez 2	JGM	Prepare Book for SAB	0.3
2020.11.03	Perez 2	SAB	Drafted response to Defendant's premotion SJ letter (5.5); legal research re same (1.9); document review re same and updated chronology (3.8); videoconf. w/ Y. Krivoshey re same (.4)	11.6
2020.11.03	Perez 2	YOK	Continued doc review. Calls and emails with SAB re pre-motion letter and regarding RCA insurance renewal docs, and research re same.	8.6
2020.11.04	Perez 2	BSS	Reviewed email re: renewal documents (0.1)	0.1
2020.11.04	Perez 2	DLS	Filed letter in response	0.4
2020.11.04	Perez 2	SAB	Revised draft response to Defendant's premotion SJ letter (1.3); drafted meet & confer email re Defendant's failure to produce documents concerning renewals of the insurance policy (1.5); videoconf. w/ Y. Krivoshey re same (.2)	3.0
2020.11.04	Perez 2	YOK	Continued doc review and saved hot docs to box. Assisted with pre-motion letter response and discussed same with SAB.	8.4
2020.11.05	Perez 2	SAB	Reviewed hot docs re insurance renewals and updated chronology	2.1
2020.11.07	Perez 2	YOK	Emailed SAB re premotion MSJ conference	0.1
2020.11.10	Perez 2	LTF	Reviewed MSJ order.	0.1
2020.11.10	Perez 2	SAB	Analyzed SJ issues	1.5
2020.11.10	Perez 2	YOK	Reviewed order re MSJ.	0.1
2020.11.11	Perez 2	LTF	Discussed MSJ order with Scott Bursor and Yeremey Krivoshey.	0.4
2020.11.11	Perez 2	SAB	Read SJ Order (.1); email corresp. w/ [REDACTED] et al re same (.3); videoconf. w/ T. Fisher re same (.2)	0.6
2020.11.11	Perez 2	YOK	Discussed MSJ order with LTF. Continued doc review.	2.5
2020.11.12	Perez 2	YOK	Continued doc review.	2.1
2020.11.13	Perez 2	JGM	Prepare Book for SAB	1.1
2020.11.13	Perez 2	SAB	Reviewed hot docs re insurance renewals and updated chronology (3.8); videoconf. w/ Y. Krivoshey re same (.5)	4.3

2020.11.13	Perez 2	RSR	Call with SAB and YOK re 11/11 IHIC production; work with JND to get production uploaded to Relativity; conf. w/ JGM re production printing for SAB (0.7); updated doc production cover letter folder and log (.1); reorganize Relativity document index (0.6)	1.4
2020.11.14	Perez 2	SAB	Developed discovery strategy and summary judgment strategy	3.3
2020.11.15	Perez 2	SAB	Developed discovery strategy and summary judgment strategy	3.1
2020.11.17	Perez 2	YOK	Updated settlement and insurance history chron, and emailed SAB re same. Continued doc review.	3.6
2020.11.18	Perez 2	SAB	Revised updated chronology and developed litigation strategy (3.8); reviewed [REDACTED] (.5)	3.8
2020.11.18	Perez 2	YOK	Revised chron and emailed SAB re same.	2.3
2020.11.19	Perez 2	SAB	Analyzed hot docs and chronology to prep for depositions (3.8); videoconf. w/ Y. Krivoshey re discovery strategy (.2); email to Max Stern re depositions of Craig Wild and Adam Williams (.2); email to mediator Bruce Friedman (.2); reviewed [REDACTED] (.3)	4.7
2020.11.22	Perez 2	SAB	Analyzed hot docs and chronology	2.5
2020.11.23	Perez 2	SAB	Teleconf. w/ mediator Bruce Friedman (.4); drafted email to Bruce Friedman re settlement negotiations (.2); teleconf. w/ [REDACTED] (.5);	1.1
2020.11.23	Perez 2	YOK	Research re summary judgment issues and emailed SAB re same.	1.6
2020.11.24	Perez 2	SAB	Revised draft [REDACTED]	2.3
2020.11.25	Perez 1	LTF	Reviewed opening appellate brief.	0.4
2020.11.25	Perez 2	SAB	Zoom conf. w/ [REDACTED] (.8); revised [REDACTED] (.5)	1.3
2020.11.26	Perez 1	SAB	Analyzed appellant's brief	4.3
2020.11.27	Perez 1	SAB	Analyzed appellant's brief	3.5
2020.11.28	Perez 1	SAB	Analyzed appellant's brief	4.3
2020.11.29	Perez 1	SAB	Analyzed appellant's brief	4.1
2020.12.01	Perez 2	SAB	Teleconf. w/ [REDACTED] (.9); discussed redactions w/ Y. Krivoshey and plan for challenging redactions before starting depositions (.4)	1.3
2020.12.01	Perez 2	YOK	Messages with SAB re privilege issues and research re raising dispute re same.	0.5
2020.12.03	Perez 2	SAB	Videoconf w/ Y. Krivoshey re strategy for challenging redactions and privilege claims	0.7
2020.12.03	Perez 2	YOK	Call with SAB re privilege issue and emailed defense counsel re same.	0.3
2020.12.03	Perez 1	YOK	Research re opposition to appeal.	1
2020.12.08	Perez 2	YOK	Emailed defense counsel re privilege log issue and strategized re same.	0.3
2020.12.09	Perez 2	JMF	Assisted with privileged logs.	4.8
2020.12.09	Perez 2	MCS	Began organizing privilege log	3
2020.12.10	Perez 2	JMF	Finalized privileged logs.	2
2020.12.10	Perez 2	MCS	Finished organizing privilege log, sent to YOK	1.7
2020.12.11	Perez 2	YOK	Research re privilege log challenge.	1.1
2020.12.15	Perez 1	DLS	Filed extension request	0.3

2020.12.15	Perez 2	SAB	Corresp. w/ Y. Krivoshey re priv log issues	0.5
2020.12.15	Perez 2	YOK	Drafted memo re privilege log issues and emailed same to SAB, and started working on meet and confer letter for SAB regarding same issues.	6.4
2020.12.15	Perez 1	YOK	Research re appeal	2.6
2020.12.16	Perez 2	YOK	Drafted meet and confer letter regarding privilege issues and research re same. Emailed SAB re same.	4.8
2020.12.17	Perez 2	SAB	Revised draft letter to Max Stern re priv log issues (.9); videoconf w/ [REDACTED] (.8); teleconf. w/ [REDACTED] (.6)	2.3
2020.12.17	Perez 2	YOK	Emailed SAB re meet and confer letter, finalized same, and sent to defense counsel. Emails with defense counsel re same.	1
2020.12.18	Perez 2	YOK	Emailed defense counsel re production issue.	0.1
2020.12.21	Perez 2	YOK	Emailed defense counsel re meet and confer call and regarding work product designation. Research re ability to withhold claim file due to claim adjuster being an attorney. Assembled docs for SAB regarding privilege dispute issues and emailed Georgina McCulloch re same, and call with SAB re same.	3.6
2020.12.22	Perez 2	JGM	Print Docs for SAB	0.2
2020.12.22	Perez 2	LTF	Exchanged messages with Scott Bursor regarding date for deposition.	0.1
2020.12.22	Perez 2	SAB	Prep for call to meet & confer on discovery issues (1.8); call w/ Max Stern, Michelle Quarry, Y. Krivoshey to meet & confer on discovery issues (.9)	2.7
2020.12.22	Perez 2	YOK	Prepared for meet and confer call regarding privilege disputes, and call with SAB prior to call re same. Participated on meet and confer call. Messaged Georgina McCulloch regarding privilege issue.	1.3
2020.12.23	Perez 2	YOK	Reviewed Defendant's email re meet and confer call and emailed him re same.	0.3
2020.12.30	Perez 2	YOK	Emailed SAB re deposition protocol	0.1
2021.01.03	Perez 2	YOK	Emailed counsel for Facebook re anticipated motion for leave to file amicus brief.	0.1
2021.01.04	Perez 1	DLS	Prepared template for appellate brief	1
2021.01.04	Perez 1	YOK	Worked on appeal brief.	8
2021.01.04	Perez 2	RSR	Prepared requested docs for [REDACTED] (1.8)	1.8
2021.01.05	Perez 1	MCS	Began drafting chronological chart of excerpts of record	6.4
2021.01.05	Perez 1	YOK	Drafted outline of appeal brief and emailed same to LTF and SAB. Discussed same with Debbie Schroeder.	7.1
2021.01.06	Perez 1	DLS	Reviewed Appellate rules; conference with LTF and YOK	2
2021.01.06	Perez 2	JGM	Print Doc for SAB	0.1
2021.01.06	Perez 2	JGM	Scan & Save Doc to Box - Term Sheet, 1 file	0.2
2021.01.06	Perez 1	LTF	Reviewed outline of appellee's brief and discussed excerpts of record issues with Yeremey Krivoshey and Debbie Schroeder.	0.7
2021.01.06	Perez 1	MCS	Completed chronological chart of excerpts of record, sent to YOK	4.5
2021.01.06	Perez 2	SAB	Corresp w/ [REDACTED] (.8); videoconf. w/ Y. Krivoshey re discovery strategy (.5)	1.3

2021.01.06	Perez 1	SAB	Videoconf. w/ Y. Krivoshey re drafting appellee's brief (.5)	0.5
2021.01.06	Perez 1	YOK	Call with Debbie Schroeder and LTF re appeal briefing strategy and excerpts of record, and continued working on appeal.	5.7
2021.01.06	Perez 2	RSR	Share Perez 1 & Perez 2 box folder to [REDACTED] (.1)	0.1
2021.01.07	Perez 1	YOK	Continued working on appeal.	5.1
2021.01.08	Perez 2	RSR	Sent new IHIC production to JND for Relativity upload and reviewed file for page count (.3); downloaded and saved doc production cover letter (.1); updated doc production log (.1)	0.5
2021.01.11	Perez 1	YOK	Worked on appeal brief.	4.4
2021.01.12	Perez 1	JKV	Call with YOK re: drafting opp to Facebook's motion for leave to file an amicus brief (.3)	0.3
2021.01.12	Perez 1	JKV	Research re: drafting motion in opp to Facebook's motion for leave to file amicus brief & deadline to file same (1.6)	1.6
2021.01.12	Perez 1	JKV	Continued researching FRAP and 9th Cir rules re: opposing motion for leave to file amicus brief (1.3); Email exchange w/ YOK re: same (.2); Calendared deadline to file opp to motion for leave as 1/19 (.1)	1.6
2021.01.12	Perez 1	JKV	Researching and drafting opposition to motion for leave (1.4); Email exchange with YOK re: same (.2)	1.6
2021.01.12	Perez 1	YOK	Continued working on appeal. Worked with Julia Venditti re response to Facebook's motion for leave to file amicus brief.	8.3
2021.01.13	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (.4)	0.4
2021.01.13	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (3.1)	3.1
2021.01.13	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (.2)	0.2
2021.01.13	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (2.6)	2.6
2021.01.13	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (5.6)	5.6
2021.01.13	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.13	Perez 1	YOK	Worked on appeal brief.	6.5
2021.01.14	Perez 1	DLS	Assisted with appellate transcripts	0.8
2021.01.14	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (3.8)	3.8
2021.01.14	Perez 1	JKV	Continued researching and drafting opposition to motion for leave (.8)	0.8
2021.01.14	Perez 1	JKV	Finished first draft of opposition to motion for leave & circulated to YOK for review (2.5)	2.5
2021.01.14	Perez 1	JKV	Email exchange w/ YOK re: revisions to draft opp to FB's motion for leave (.5)	0.5
2021.01.14	Perez 1	JKV	Call with YOK re: revisions to draft opp motion (.6); Call with YOK re: jurisdictional argument (.1); Researching waiver & jxal issue (.5)	1.2
2021.01.14	Perez 1	LTF	Discussed appellate brief outline with Scott Bursor and exchanged messages with Yeremey Krivoshey regarding same.	0.1
2021.01.14	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.14	Perez 1	YOK	Continued working with Julia Venditti on opposition to Facebook's motion for leave to file amicus brief, and worked on appeal brief.	6.9

2021.01.14	Perez 2	RSR	Added requested docs to box folder for [REDACTED] and emailed YOK re same (.3)	0.3
2021.01.15	Perez 1	DLS	Prepared tables and filed opposition appellate brief	3.5
2021.01.15	Perez 1	JKV	Revising draft opposition to motion for leave (2.7)	2.7
2021.01.15	Perez 1	JKV	Revising draft opposition to motion for leave (3.2)	3.2
2021.01.15	Perez 1	LTF	Discussed opposition to motion to file amicus curiae brief with Yeremey Krivoshey and exchanged messages regarding same with Debbie Schroeder.	0.1
2021.01.15	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.15	Perez 2	YOK	Discussed deposition protocol with SAB and reviewed emails re same.	0.3
2021.01.15	Perez 1	YOK	Finalized opposition to Facebook's motion for leave to file amicus brief and worked on same with Julia Venditti, continued working on appeal brief.	8.4
2021.01.15	Perez 2	RSR	Added requested docs to box folder for [REDACTED] and emailed [REDACTED] re same (.2)	0.2
2021.01.16	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.17	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.18	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.18	Perez 1	YOK	Continued working on appeal brief.	7.6
2021.01.19	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.19	Perez 1	YOK	Continued working on appeal.	6.7
2021.01.19	Perez 2	RSR	Send retainers to C. Young and follow up with Citibank re LOC documentation (.2)	0.2
2021.01.20	Perez 2	LTF	Reviewed deposition subpoenas and saved them to Box.	0.2
2021.01.20	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.20	Perez 1	YOK	Continued working on appeal.	3.5
2021.01.21	Perez 2	LTF	Reviewed order on deposition protocol.	0.1
2021.01.21	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.21	Perez 1	YOK	Continued working on appeal brief.	8.5
2021.01.22	Perez 1	DLS	Prepared Table of contents and made formatting edits to appellate brief	0.7
2021.01.22	Perez 2	LTF	Reviewed emails I sent in the Rash Curtis case.	0.8
2021.01.22	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.22	Perez 1	YOK	Continued working on appeal brief and emailed draft to SAB/LTF	6.2
2021.01.23	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.24	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.24	Perez 1	YOK	Call with SAB re appeal brief	0.2
2021.01.25	Perez 1	DLS	Assisted with appellate brief	0.6
2021.01.25	Perez 1	LTF	Discussed appellate brief with Yeremey Krivoshey and reviewed and redlined brief and exchanged emails with Mr. Krivoshey regarding same.	3.3
2021.01.25	Perez 1	MCS	Discussions with Debbie re appellate brief, excerpts of record. Checked word count on doc, refreshed on ninth circuit rules	1

2021.01.25	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.25	Perez 1	YOK	Continued working on appeal brief, discussed same with LTF, reviewed LTF's edits to brief.	9.4
2021.01.25	Perez 2	RSR	Shared Perez 1 & 2 box access with diligence counsel (.1)	0.1
2021.01.26	Perez 1	JKV	Conf. w/ YOK re: assisting with appeal brief (.1); Proof read appellate brief and checked all case/record citations (2.9)	3
2021.01.26	Perez 1	LTF	Discussed appellate brief with Yeremey Krivoshey and Debbie Schroeder.	0.4
2021.01.26	Perez 1	MCS	Began work on excerpts of record, discussions with Debbie re same.	4.5
2021.01.26	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.26	Perez 1	YOK	Continued working on appeal brief. Discussed same with LTF, Debbie Schroeder, and Julia Venditti.	6.3
2021.01.27	Perez 1	DLS	Assisted with preparing supplemental excerpts of record and answering brief; finalized and filed	14
2021.01.27	Perez 1	LTF	Calls and emails with Debbie Schroeder regarding filing of appellate brief.	1.7
2021.01.27	Perez 1	MCS	Drafted excerpts of record index, updated and finalized as needed. Put together excerpts of record, added page numbers and cover sheets, updated as needed. Ran cite formatting and inserted tables into brief, updated after edits to brief. Discussions with DLS and YOK re brief and supplementary excerpts of record. Put docs on box once filed.	14.5
2021.01.27	Perez 1	SAB	Drafted appellee's brief	3.0
2021.01.27	Perez 1	YOK	Worked on, finalized, and filed appeal brief and supplemental excerpts of record. Discussions with Debbie Schroeder and Molly Sasseen re same.	14.3
2021.01.28	Perez 1	LTF	Reviewed filed appellate brief and discussed it with Debbie Schroeder and Yeremey Krivoshey.	0.7
2021.01.28	Perez 2	SAB	Prep for upcoming depositions of Y. Krivoshey and T. Fisher	7.2
2021.01.28	Perez 2	YOK	Worked on discovery responses to RFAs and ROGs	2
2021.01.28	Perez 1	YOK	Call with Debbie Schroeder and call with LTF re appeal brief filing.	0.5
2021.01.28	Perez 1	RSR	Updated Perez box folder with Appellee's Answering Brief and sent same to [REDACTED] (.2)	0.2
2021.01.28	Perez 1	RSR	Updated Perez box folder with Appellee's Answering Brief and sent same to [REDACTED] (.2)	0.2
2021.01.29	Perez 2	DLS	Prepared template for interrogatories; finalized Rogs and RFAs and served	1
2021.01.29	Perez 2	JGM	Prepare Hearing Book	1.4
2021.01.29	Perez 2	LTF	Discussed depositions with Scott Bursor, Yeremey Krivoshey and Debbie Schroeder and prepared index for depo prep book and reviewed documents (1.4); reviewed responses to RFAs and second set of interrogatories and emails regarding same (.3).	1.7
2021.01.29	Perez 2	SAB	Prep for upcoming depositions of Y. Krivoshey and T. Fisher	7.1

2021.01.29	Perez 2	YOK	Finished working on plaintiff's discovery responses to RFAs and Interrogatories, call with SAB and LTF re same, and calls with Debbie Schroeder re same. Call with SAB and LTF re deposition prep, and messages with Georgina McCulloch re same. Prepped for deposition.	4.8
2021.01.29	Perez 1	RSR	Conf. w/ YOK re ECA docs and send same to [REDACTED] (.2)	0.2
2021.01.30	Perez 2	LTF	Prepared for deposition and reviewed depo prep materials.	2.2
2021.01.30	Perez 2	SAB	Prep for upcoming depositions of Y. Krivoshey and T. Fisher and analyzed proposed litigation funding contract from [REDACTED]	7.0
2021.01.31	Perez 2	LTF	Reviewed deposition prep book.	1.3
2021.01.31	Perez 2	SAB	Prep for upcoming depositions of Y. Krivoshey and T. Fisher and analyzed proposed litigation funding contract from [REDACTED]	6.3
2021.02.01	Perez 2	BER	Discussed depositions with LTF and reviewed deposition materials.	0.8
2021.02.01	Perez 1	DLS	Worked on deficiency in excerpts of record	1
2021.02.01	Perez 2	JIM	Telephone call with S. Bursor about upcoming depositions	0.3
2021.02.01	Perez 1	JKV	Call with YOK re: re-doing excerpt of records by 5 pm tomorrow (.2)	0.2
2021.02.01	Perez 2	LTF	Depo prep with Scott Bursor and Yeremey Krivoshey.	3
2021.02.01	Perez 1	LTF	Discussed appellate filing issues with Debbie Schroeder.	0.2
2021.02.01	Perez 2	SAB	Depo prep for upcoming depositions of Y. Krivoshey and T. Fisher (6.5); Prep for and attend zoom call w/ [REDACTED] (2.1)	8.6
2021.02.01	Perez 2	YOK	Depo prep with SAB and LTF (3.0). Continued doc review and update of chron, and circulated updated chron to LTF and SAB (5.8).	8.8
2021.02.01	Perez 2	RSR	Call with SAB and YOK (.3); conf. w/ YOK re IHIC doc production and followed up with JND re same (.2)	0.5
2021.02.02	Perez 2	BER	Prepared for and attended YOK deposition with YOK, SAB, and LTF.	5.9
2021.02.02	Perez 1	DLS	Worked on appellate deficiencies	2
2021.02.02	Perez 2	JGM	Prepare Book for SAB	0.2
2021.02.02	Perez 2	JIM	Confer with S. Bursor about deposition of Y. Krivoshey	0.2
2021.02.02	Perez 1	JKV	Revising brief in accordance with repaginated excerpt of records (1.5); Call with D.Schroeder re: same (.5); Continued revising brief in accordance with repaginated excerpt of records (4.1); Call with D.Schroeder re: same (.2)	6.3
2021.02.02	Perez 1	JKV	Made additional edits to answering brief & call w/ YOK re: same (.3)	0.8
2021.02.02	Perez 2	LTF	Attended Krivoshey deposition and follow up with Scott Bursor, Blair Reed, and Mr. Krivoshey afterwards.	5.6
2021.02.02	Perez 1	LTF	Discussed re-submission of excerpts of record and appellate brief with Debbie Schroeder.	0.1
2021.02.02	Perez 2	SAB	Prep for Y. Krivoshey deposition (1.3); defended Y. Krivoshey deposition (6.0); videoconf. w/ Y. Krivoshey & T. Fisher to debrief after depo (.4)	7.7
2021.02.02	Perez 2	YOK	Prepared for my deposition, attended my deposition, and conferred with SAB, LTF, and BER re same. Continued doc review.	7.4



2021.02.02	Perez 1	YOK	Worked with Julia Venditti and Debbie Schroeder on filing updated supplemental excerpts of record and answering brief for 9th Circuit.	2
2021.02.02	Perez 2	RSR	Follow up emails with JND re IHIC production and conf. w/ YOK re same (.2)	0.2
2021.02.03	Perez 2	BER	Reviewed YOK deposition transcript.	0.9
2021.02.03	Perez 2	JGM	Print Court Trascript for SAB	0.1
2021.02.03	Perez 2	JIM	Confer with S. Bursor regarding case strategy	0.6
2021.02.03	Perez 2	LTF	Reviewed Krivoshey deposition transcript and discussed deposition with Scott Bursor.	6.8
2021.02.03	Perez 2	SAB	Prep for upcoming deposition of Tim Fisher	3.5
2021.02.03	Perez 2	YOK	Reviewed Krivoshey deposition transcript, continued doc review.	4.6
2021.02.04	Perez 2	BER	Prepared for and attended LTF deposition with LTF, SAB, and YOK.	3.8
2021.02.04	Perez 2	LTF	Prepared for and attended my deposition and discussed next steps in the case with Scott Bursor and Yeremey Krivoshey.	3.5
2021.02.04	Perez 2	SAB	Prep for and defended Tim Fisher deposition (5.5); videoconf. w/ T. Fisher and Y. Krivoshey re litigation strategy and next steps (1.0)	6.5
2021.02.04	Perez 2	YOK	Prepped for and attended LTF deposition and discussed same with LTF and SAB. Continued working on and updating chron.	5.2
2021.02.05	Perez 2	SAB	Call w/ [REDACTED]	2.0
2021.02.05	Perez 2	YOK	Drafted 3rd set of ROGs and 2nd set of RFAs	1
2021.02.08	Perez 2	SAB	Multiple videoconfs. w/ Y. Krivoshey re draft rogs and RFAs, and revised draft rogs and RFAs and developed discovery strategy (4.3)	4.3
2021.02.08	Perez 2	YOK	Discussed deposition scheduling with SAB. Continued doc review and chron update. Emailed defense counsel re deposition scheduling for Adam Williams.	4.8
2021.02.09	Perez 1	DLS	Prepared appellate docs to be printed and overnighted to appellate court	0.5
2021.02.09	Perez 1	JKV	Reviewed circuit rules & docket, did research to determine whether we have grounds to oppose RC's streamlined request for extension of time to file reply brief, and sent email memo to YOK re same (.8)	0.8
2021.02.09	Perez 2	YOK	Continued doc review and chron update.	7.8
2021.02.09	Perez 1	YOK	Reviewed D's request for extension and discussed whether P has grounds to oppose with Julia Venditti.	0.3
2021.02.10	Perez 1	DLS	Followed up with Quivx re appellate copies	0.2
2021.02.10	Perez 2	JIM	Calls with S. Bursor and internal team regarding case strategy, and review email from S. Bursor about same	0.7
2021.02.10	Perez 2	LTF	Reviewed updated chron and emails regarding same.	0.3
2021.02.10	Perez 2	SAB	Teleconf. w/ J. Marchese & [REDACTED] (.7); drafted email to [REDACTED] re same (.7); email to [REDACTED] (.8)	2.2
2021.02.10	Perez 2	YOK	Continued doc review and chron update. Emailed LTF and SAB re summary of new findings in doc review and as reflected on chron.	6.3
2021.02.11	Perez 2	SAB	Analyzed updates to chronology	2.6
2021.02.11	Perez 2	YOK	Gathered docs for Wild deposition and updated chron.	1.8

2021.02.16	Perez 2	DLS	Prepared deposition notice and served	0.6
2021.02.16	Perez 2	SAB	Deposition prep for upcoming depositions of Craig Wild and Adam Williams, including videoconf. w/ Y. Krivoshey & J. Pearl of Veritext (2.5)	2.5
2021.02.16	Perez 2	YOK	Depo prep with SAB and Jonathan from Veritext. Discussions with SAB re deposition prep and assisted with same. Worked on Wild depo notice with Debbie Schroeder.	4.3
2021.02.17	Perez 2	DLS	Added depo notice to schedule	0.1
2021.02.17	Perez 2	LTF	Exchanged messages with Yeremey Krivoshey regarding deposition schedule and reviewed emails regarding same.	0.2
2021.02.17	Perez 2	SAB	Prep for Craig Wild deposition	4.5
2021.02.17	Perez 2	YOK	Call with SAB and defense counsel re deposition scheduling. Continued gathering docs and assisting SAB with prep for Wild deposition.	4.4
2021.02.18	Perez 2	SAB	Prep for Craig Wild deposition	5.3
2021.02.18	Perez 2	RSR	Conf. w/ SAB and JND re C. Wild depo docs (.3)	0.3
2021.02.19	Perez 2	BSS	Conf. w/ YOK re: Wild deposition project (0.2); Prepared document folders for Wild deposition (1.4); Emailed GM re: same (0.1)	1.7
2021.02.19	Perez 2	JGM	Email from SAB re Deposition Prep Materials	0.1
2021.02.19	Perez 2	YOK	Assisted with prep for Wild deposition, and discussions with SAB, Brittany Scott, and Rebecca Richter re same.	4.1
2021.02.19	Perez 2	RSR	Set up BSS Relativity access (.1)	0.1
2021.02.22	Perez 2	BSS	Reviewed email re: Wild Chron docs (0.1)	0.1
2021.02.22	Perez 2	BSS	Conf. w/ YOK re: research re: defense attorneys' fees (0.1); Researched defense attorneys' fees (0.6); Researched SF Bay Area attorneys' fees (0.2)	0.9
2021.02.22	Perez 2	DLS	Assisted with deposition index	0.3
2021.02.22	Perez 2	JGM	Prepare Wild Deposition Documents	1.6
2021.02.22	Perez 2	JGM	Print Doc for SAB	0.2
2021.02.22	Perez 2	JGM	Prepare Book for SAB	0.6
2021.02.22	Perez 2	JMF	Prepared depo exhibit index and discussed with DLS.	0.6
2021.02.22	Perez 2	SAB	Prep for Craig Wild deposition	12.6
2021.02.22	Perez 2	YOK	Prep for Wild deposition with SAB, Brittany Scott, and staff.	7.2
2021.02.23	Perez 2	JGM	Deliver Book to SAB	0.1
2021.02.23	Perez 2	LTF	Exchanged messages with Yeremey Krivoshey and Blair Reed regarding Wild deposition.	0.2
2021.02.23	Perez 2	SAB	Prep for and take Craig Wild deposition	11.3
2021.02.23	Perez 2	YOK	Prepped for and participated at Wild deposition.	8.1
2021.02.23	Perez 2	RSR	Saved doc request from [REDACTED] to box folder (0.1)	0.1
2021.02.24	Perez 2	JGM	Prepare Book for SAB	0.4
2021.02.24	Perez 2	JGM	Print Deposition Transcripts for SAB	0.2
2021.02.24	Perez 2	JGM	Prepare +4 Books for SAB	0.7

2021.02.24	Perez 2	SAB	prep for upcoming depositions and developed discovery strategy (5.8); corresp. w/ A. Griffiths re upcoming depositions of Bob Keith and Terry Paff (.3)	6.1
2021.02.25	Perez 2	JGM	Prepare +4 Books for SAB	0.7
2021.02.25	Perez 2	JGM	Print Deposition Transcripts for SAB	0.1
2021.02.25	Perez 2	SAB	Prep for upcoming depositions and updated chronology and exhibit indexes	7.2
2021.02.26	Perez 2	SAB	Analyzed Krivoshey deposition transcript (3.2); analyzed Fisher deposition transcript (.9); analyzed Craig Wild deposition transcript (4.6); Prep for upcoming depositions (1.5)	10.2
2021.02.26	Perez 2	RSR	Conf. w/ SAB re upcoming depos and emailed JND re document search requests (.2)	0.2
2021.02.27	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.02.28	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.03.01	Perez 2	JIM	Conferences with S. Bursor about upcoming depositions	0.7
2021.03.01	Perez 2	SAB	Analyzed Exhibit 24 and Prep for upcoming depositions	6.5
2021.03.02	Perez 2	JIM	Telephone call with S. Bursor about case strategy	0.5
2021.03.02	Perez 2	SAB	Prep for upcoming depositions (5.3); conf. call w/ [REDACTED] (.9)	6.2
2021.03.02	Perez 2	YOK	Call with SAB re production and privilege issues and reviewed email re same.	0.3
2021.03.03	Perez 2	JGM	Save Doc to Box - Transcript Mark-up, 2 files	0.1
2021.03.03	Perez 2	JIM	Telephone call with S. Bursor about case strategy	1.0
2021.03.03	Perez 2	SAB	Prep for upcoming depositions (6.1); conf. call w/ [REDACTED] (.8)	6.9
2021.03.04	Perez 2	JGM	Prepare Exhibits Files for SAB	3.6
2021.03.04	Perez 2	SAB	Prep for Adam Williams deposition	4.7
2021.03.04	Perez 2	SAB	Prep for Adam Williams deposition (6.3); teleconf. w/ J. Linares re potential mediation/settlement strategy (.4)	6.7
2021.03.05	Perez 2	JGM	Extract Pages from Complaint	0.1
2021.03.05	Perez 2	JIM	Confer with S. Bursor about deposition discovery	0.3
2021.03.05	Perez 2	SAB	Updated chron and prep for Adam Williams deposition	7.0
2021.03.05	Perez 2	YOK	Worked with SAB on prep for Williams depo.	2.1
2021.03.06	Perez 2	JIM	Confer with S. Bursor about settlement strategy	0.5
2021.03.08	Perez 2	JGM	Call and relay message to SAB	0.1
2021.03.08	Perez 2	JGM	Call and relay message to SAB	0.1
2021.03.08	Perez 2	SAB	Prep for upcoming depo of Adam Williams and update chronology	4.3
2021.03.08	Perez 2	YOK	Prep for Williams depo and call with SAB re same.	1
2021.03.09	Perez 2	DLS	Finalized and served deposition notice	0.3
2021.03.09	Perez 2	JGM	Create Calendar Entries	0.2
2021.03.09	Perez 2	SAB	Prep for Adam Williams dep (6.3); teleconf. w/ [REDACTED] re settlement strategy (1.0); corresp. w/ [REDACTED] (.4); videoconf. w/ Y. Krivoshey re defendant's discovery requests and strategy for responding (.4)	8.1

2021.03.09	Perez 2	YOK	Prep for Williams depo, and discussions with SAB, Debbie Schroeder, and Veritext re same.	6.4
2021.03.09	Perez 2	RSR	Pull docs for SAB (0.6); email D. Olson re upload of Integrity Insurance supplemental production (.2); save production cover letter and update Doc Production log (.2)	1
2021.03.10	Perez 2	JIM	Confer with S. Bursor about upcoming deposition discovery	0.5
2021.03.10	Perez 2	SAB	Prep for Adam Williams deposition	9.3
2021.03.10	Perez 2	YOK	Reviewed new production, updated chron, saved hot docs, and assisted SAB with prep for Williams deposition.	8.3
2021.03.11	Perez 2	JGM	SAB Personal - Print and Organize Doc Productions for SAB	0.6
2021.03.11	Perez 2	JGM	Prepare SAB Docs for Deposition	0.9
2021.03.11	Perez 2	SAB	Prep for Adam Williams deposition	7.5
2021.03.11	Perez 2	YOK	Continued doc review, updating chron, and prep for Williams deposition with SAB.	7.2
2021.03.11	Perez 2	RSR	Williams depo prep (0.5)	0.5
2021.03.12	Perez 2	JGM	Order Team Lunch for Depo attendees	0.2
2021.03.12	Perez 2	JGM	Prepare Conference Room for Deposition	0.4
2021.03.12	Perez 2	JGM	Assist Deposition	5
2021.03.12	Perez 2	SAB	Prep for and took Adam Williams deposition	10.2
2021.03.12	Perez 2	YOK	Prep for Williams depo with SAB, attended Williams depo, and call with SAB re same.	10
2021.03.13	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.03.14	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.03.15	Perez 2	JGM	Print New Exhibits & Update Deposition Exhibit Index for SAB	0.8
2021.03.15	Perez 2	SAB	Prep for upcoming depositions, updated chronology and exhibit indexes (4.8); email to M. Stern re continuation of Adam Williams deposition (.2); email corresp. w/ Amanda Griffiths re rescheduling Paff/Keith prep session (.3)	5.3
2021.03.15	Perez 2	YOK	Research re MSJ issues (duty to negotiate, hammer clause, consent clause, authority caps) and emailed SAB a summary/memo of same.	7.9
2021.03.16	Perez 2	JGM	Save Doc to Box - Deposition Transcripts, 16 files	0.1
2021.03.16	Perez 2	JGM	Print Transcript for SAB, SNB, CRR & RLM	0.1
2021.03.16	Perez 2	JGM	Print Exhibit Index for SAB	0.1
2021.03.16	Perez 2	JGM	Prepare Exhibits Prep Books/Folders	1.7
2021.03.16	Perez 2	SAB	Analyzed transcript of Adam Williams deposition (4.8); corresp. w/ Max Stern re continuation of Williams deposition (.4); updated chronology (1.3); prep for defense of upcoming depositions of Bob Keith and Terry Paff (2.5)	9.0
2021.03.16	Perez 2	YOK	Reviewed Williams depo transcript, continued doc review and emailed SAB re same, assisted with prep for upcoming depositions.	7.8
2021.03.17	Perez 2	JGM	Replicate Exhibit SAB Markup on copies (3) and mail to counsel	1.6
2021.03.17	Perez 2	SAB	Corresp. w/ [REDACTED] (.7); prep for defense of upcoming depositions of Bob Keith and Terry Paff (4.2)	4.9

2021.03.17	Perez 2	YOK	Continued research re MSJ issues	2
2021.03.18	Perez 2	DLS	Prepared proof of service; finalized notices of deposition and served	0.9
2021.03.18	Perez 2	SAB	Prep for upcoming depositions	4.1
2021.03.18	Perez 1	SAB	Analyzed appellate issues [REDACTED]	3.8
2021.03.18	Perez 2	YOK	Drafted and circulated memo re motion to compel additional deposition time. Drafted Ellis and Valenti subpoenas and notices of deposition and worked with Debbie Schroeder re same. Correspondence with defense counsel re Ellis and Valenti depositions.	4.9
2021.03.18	Perez 1	YOK	Emails with SAB re appeal issues and research re same.	1
2021.03.19	Perez 2	JGM	Add Deposition Information to Calendar	0.2
2021.03.19	Perez 2	JGM	Prepare Book for SAB	0.3
2021.03.19	Perez 2	LTF	Email exchange with Scott Bursor and Yeremey Krivoshey regarding proposed stipulation on various deponents.	0.4
2021.03.19	Perez 2	SAB	Prep for upcoming depositions	4.1
2021.03.19	Perez 1	SAB	Analyzed appellate issues [REDACTED]	4.3
2021.03.19	Perez 2	YOK	Drafted responses to D's latest RFPs and emailed draft to SAB. Assisted with prep for upcoming depos. Continued research re MSJ issues.	4.2
2021.03.19	Perez 1	YOK	Research re appeal issues and emailed SAB re same. Reviewed defendant's appeal reply brief.	3.2
2021.03.20	Perez 2	SAB	Prep for upcoming depositions	4.5
2021.03.21	Perez 2	SAB	Prep for upcoming depositions	4.3
2021.03.21	Perez 2	YOK	Lengthy email to LTF and SAB re depositions and prep re same.	1
2021.03.22	Perez 2	JGM	Update Calendar Entry	0.1
2021.03.22	Perez 2	SAB	Prep for upcoming depositions (6.4); teleconf. w/ A. Griffiths re same (.4)	6.8
2021.03.22	Perez 2	YOK	Drafted plaintiff's portion of discovery letter re further deposition of Adam Williams, and emails with SAB re same. Emailed defense counsel re same. Assisted SAB with depo prep.	7.9
2021.03.23	Perez 2	DLS	Prepared re-noticed subpoenas and notice depositions; sent to First Legal for service and served by email	1
2021.03.23	Perez 2	JGM	Update Veritext Deposition Request	0.2
2021.03.23	Perez 2	JGM	Call Veritext & Update Deposition Schedule	0.3
2021.03.23	Perez 2	JMF	Mailed depo notices.	0.3
2021.03.23	Perez 2	LTF	Reviewed revised deposition and witness stipulation and discussed it with Yeremey Krivoshey and Scott Bursor (.7); call with defendant's counsel regarding same (.5).	1.2
2021.03.23	Perez 2	SAB	Revised draft letter re continuation of Adam Williams deposition (2.2); revised draft witness stip (1.8); zoom conf. w/ A. Griffiths, Bob Keith, Terry Paff, Chriss Paff, and Y. Krivoshey re depo prep (4.5); teleconf. w/ T. Fisher & Y. Krivoshey re revisions to the witness stip (.6); teleconf. w/ Max Stern et al re meet & confer on witness stip and other discovery issues (.8); teleconf. w/ [REDACTED] re common interest privilege (.3)	10.2

2021.03.23	Perez 2	YOK	Worked on stipulation re witnesses with SAB and LTF. Prep call with SAB, RCA witnesses and their counsel to prep for their depositions. Call with defense counsel and SAB re witness stipulation. Worked on discovery letter re Williams with SAB. Worked on updated subpoenas for Valenti and Ellis with Debbie Schroeder.	8.3
2021.03.24	Perez 2	DLS	Prepared drafts of motion to seal; finalized discovery letter and motion to seal; filed and served	3
2021.03.24	Perez 2	DLS	Served notice of deposition and scheduled deposition	0.7
2021.03.24	Perez 2	JGM	Create Calendar Entries- Depo Prep	0.1
2021.03.24	Perez 2	LTF	Discussed stipulation and authority letter issue with Scott Bursor and Yeremey Krivoshey and reviewed emails regarding same (.4); reviewed revised discovery dispute letter and emails regarding same (.3).	0.7
2021.03.24	Perez 2	SAB	Email and teleconf. w/ A. Griffith re common interest privilege and continued depo prep for Bob Keith and Terry Paff (.4); teleconf w/ [REDACTED] re common interest privilege (.3); legal research re common interest privilege (1.1); reviewed draft stip re ELG depositions (.2); videoconf. w/ T. Fisher & Y. Krivoshey re witness stip, discovery strategy, and litigation strategy (.6); prep for upcoming depositions (3.2); finalized joint letter re extension of Williams deposition (4.1)	9.9
2021.03.24	Perez 2	YOK	Worked on discovery letter re Williams depo with SAB and Debbie Schroeder, and prepared sealing docs re same. Call with SAB and LTF re witness stipulation and discovery issues. Drafted stipulation re Ellis and Valenti depositions, and emails with defense counsel and SAB re same. Worked on Markoutsis depo notice with Debbie Schroeder and discussed same with SAB.	8.1
2021.03.25	Perez 2	JGM	Update Calendar Entry - Deposition	0.2
2021.03.25	Perez 2	SAB	Analyzed discovery letter re Adam Williams dep. (.4); videoconf. w/ B. Keith, T. Paff, A. Griffith and Y. Krivoshey re depo prep (2.8); read [REDACTED] (.6); developed discovery strategy (2.3)	6.1
2021.03.25	Perez 2	YOK	Prep call with SAB and RCA witnesses and attorney.	2.8
2021.03.26	Perez 2	DLS	Finalized and served responses to 2nd RFPs	0.4
2021.03.26	Perez 2	LTF	Reviewed discovery order and exchanged messages with Yeremey Krivoshey regarding same (.2); reviewed emails from Scott Bursor and Mr. Krivoshey regarding policy language (.1).	0.3
2021.03.26	Perez 2	SAB	Reviewed Craig Wild depo errata (.3); analyzed order on Williams deposition (.4); prep for upcoming depositions (4.8); conf. call w/ M. Stern et al re various discovery issues (.6)	6.1
2021.03.26	Perez 2	YOK	Reviewed order re Williams deposition, and discussed same with LTF and SAB. Reviewed Wild depo errata. Assisted with depo prep. Call with defense counsel re discovery scheduling and to meet and confer re guideline and authority letter production.	3.9
2021.03.26	Perez 2	YOK	Finalized and worked with Debbie Schroeder on serving discovery responses to Defendant's RFPs.	0.6
2021.03.27	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.03.28	Perez 2	SAB	Prep for upcoming depositions	4.0

2021.03.29	Perez 2	JGM	Prepare Book for SAB	0.4
2021.03.29	Perez 2	JGM	Call and relay message to SAB (Amanda Griffith)	0.1
2021.03.29	Perez 2	LTF	Reviewed B. Keith deposition transcript.	1.2
2021.03.29	Perez 2	SAB	Prep for and attend Bob Keith deposition (8.6); teleconf. to debrief with Amanda Griffith (.2); videoconf. to debrief with Y. Krivoshey (.2)	9.0
2021.03.29	Perez 2	YOK	Prepped for and attended Robert Keith deposition, and calls with Amanda Griffith and SAB re same.	9
2021.03.30	Perez 2	JGM	Format Deposition Transcript for SAB	1.6
2021.03.30	Perez 2	JIM	Confer with S. Bursor about today's deposition and upcoming depositions	0.6
2021.03.30	Perez 2	SAB	Analyzed rough transcript of yesterday's Bob Keith deposition (2.2); prep for and attend Terry Paff deposition (9.0)	11.2
2021.03.30	Perez 2	YOK	Reviewed transcript from Bob Keith's depo, and attended Terry Paff deposition. Discussed same with SAB.	9.4
2021.03.31	Perez 2	JGM	Format Deposition Transcript for SAB	1.4
2021.03.31	Perez 2	JGM	Update Exhibits Folder for SAB	2.9
2021.03.31	Perez 2	LTF	Reviewed T. Paff deposition transcript.	1.6
2021.03.31	Perez 2	SAB	Prep for upcoming depositions	6.3
2021.03.31	Perez 2	YOK	Reviewed Paff rough transcript, assisted with prep for upcoming depositions.	1.5
2021.03.31	Perez 2	RSR	Emailed D. Olson re Relativity upload (.2)	0.2
2021.04.01	Perez 1	BER	Reviewed Digid v. Facebook decision.	0.5
2021.04.01	Perez 2	JGM	Print Production Docs IHIC009	0.6
2021.04.01	Perez 1	LTF	Reviewed SCOTUS decision from Facebook case and exchanged messages with Debbie Schroeder regarding its impact and reviewed emails from Scott Bursor and others regarding same.	0.5
2021.04.01	Perez 2	SAB	Prep for and attended Ben Johnson deposition (7.5); email to [REDACTED] re this morning's Facebook v. Duguid decision by Supreme Court (.3)	7.8
2021.04.01	Perez 2	YOK	Prepped for and attended Ben Johnson deposition. Call with defense counsel and SAB after depo re scheduling. Call with SAB to debrief. Emails with SAB and LTF re authority letter issue. Emailed defense counsel re authority letters. Reviewed newest production, saved hot docs, and emailed SAB re same.	7.5
2021.04.01	Perez 1	YOK	Reviewed Facebook v. Duguid order and discussed impact with SAB.	1
2021.04.01	Perez 2	RSR	Emails with D. Olson re Relativity upload (.1); save doc production cover letter to box and update doc production log (.2); conf. w/ JGM re Relativity credentials and IHIC 009 printing for SAB review (.2)	0.5
2021.04.02	Perez 2	ESG	Assist w/ Depo Exhibits SAB	1
2021.04.02	Perez 2	JGM	Update Exhibits Folder for SAB	1.4
2021.04.02	Perez 2	SAB	Conf. call w/ [REDACTED] (.8); attended Sedliak deposition (2.0); teleconf. w/ C. Weir re [REDACTED] (.4); email corresp. w/ [REDACTED] (.3); prep for upcoming depositions (2.3)	5.8

2021.04.02	Perez 2	YOK	Prepped for and attended Sedliak deposition, reviewed stipulation re witnesses and emailed SAB re same, reviewed D's production of authority letters, prepped for upcoming depos, call with Georgina McCulloch re depo exhibits.	4.1
2021.04.05	Perez 2	AEL	Spoke w/ Chai from Esquire Depositions re Robert Keith depo, sent follow up message to YOK (.1)	0.1
2021.04.05	Perez 2	JGM	Update Exhibits Folder for SAB	1.4
2021.04.05	Perez 2	JGM	Print Deposition Transcript	0.1
2021.04.05	Perez 2	JGM	Update Deposition Exhibits Folder for SAB	1.7
2021.04.05	Perez 2	JGM	Print Deposition Transcript	0.1
2021.04.05	Perez 2	MCS	Finalized and filed stipulation, sent proposed order to Judge Gonzalez Rogers.	1
2021.04.05	Perez 2	SAB	Analyzed Keith depo transcript (2.2); analyzed Terry Paff depo transcript (1.9); prep for upcoming depositions (3.5)	7.6
2021.04.05	Perez 2	YOK	Finalized and filed stipulation #2. Updated exhibit log and descriptions. Prep re Chris Paff depo.	4.2
2021.04.06	Perez 2	DLS	Prepared new depo notices and served; scheduled with Veritext	0.7
2021.04.06	Perez 2	JGM	Change Dates of Depotion of Nina Markoutsis	0.2
2021.04.06	Perez 2	JGM	Call w/DLS	0.2
2021.04.06	Perez 2	JGM	Update Caledar Entry	0.1
2021.04.06	Perez 2	SAB	Teleconf. w/ A. Griffith re prep for Chris Paff deposition (.2); prep for and defended Chris Paff deposition (7.5)	7.7
2021.04.06	Perez 1	SAB	Analyzed appellant's letter re supplemental authority Facebook v. Duguid & videoconf. w/ Y. Krivoshey re same	0.5
2021.04.06	Perez 2	YOK	Prepped for and attended Chris Paff deposition. Call with SAB re same. Discussed Markoutsis and Williams depo notices with Debbie Schroeder and reviewed same.	7.8
2021.04.06	Perez 1	YOK	Reviewed notice of supplemental authority filing, research re same, and discussed same with SAB.	0.5
2021.04.06	Perez 1	RSR	Saved hearing transcripts to box folder for [REDACTED] re same (.2)	0.2
2021.04.07	Perez 1	BSS	Reviewed email re: appeal research (0.1); Conf. w/ YOK re: same (0.2); Researched remand issues (1.4); Reviewed email re: same (0.1)	1.8
2021.04.07	Perez 2	DLS	Made edits to discovery responses; prepared proof of service and served	0.7
2021.04.07	Perez 2	JGM	Update Exhibits Folder for SAB	0.6
2021.04.07	Perez 2	JGM	Print Docs for SAB	0.6
2021.04.07	Perez 2	JGM	Print Authority Letter	0.2
2021.04.07	Perez 2	JMF	Assisted with saiving depo docs to box.	0.6
2021.04.07	Perez 2	SAB	Videoconf. w/ [REDACTED] (1.6); prep for Ellis deposition (8.3)	9.9
2021.04.07	Perez 2	YOK	Worked on discovery responses and discussed same with SAB and Debbie Schroeder. Calls with SAB re Ellis deposition and assisted with prep re same. Call with BER re Ellis and Valenti depositions.	5.1



2021.04.07	Perez 1	YOK	Research re response to notice of supplemental authority, emails with SAB and BSS re same, call with BSS re same.	2
2021.04.08	Perez 2	BER	Prepared for and attended Mark Ellis deposition with YOK and SAB.	8
2021.04.08	Perez 2	SAB	Prep for and take deposition of Mark Ellis (5.5); prep for tomorrow's deposition of Anthony Valenti (1.1)	6.6
2021.04.08	Perez 1	SAB	Drafted letter to Court of Appeals re Facebook v. Duguid, including multiple videoconfs. w/ Y. Krivoshey re same (2.7)	2.7
2021.04.08	Perez 2	YOK	Attended Mark Ellis deposition, and assisted with prep re Valenti deposition.	6
2021.04.08	Perez 1	YOK	Redlined letter response re Duguid case and researched caselaw re reducing awards on appeal and remand and interest dating back to original judgment.	2.7
2021.04.09	Perez 1	DLS	Filed appellate letter	0.6
2021.04.09	Perez 2	JGM	Arrange SAB Curtains for Depo	0.1
2021.04.09	Perez 2	SAB	Prep for and took Anthony Valenti deposition (4.3); prep for upcoming depositions (2.5)	6.8
2021.04.09	Perez 1	SAB	Revised and finalized letter to 9th Circuit re Facebook v. Duguid	2.2
2021.04.09	Perez 2	YOK	Research re IHIC's defenses and emailed SAB a memo re same. Prepped for and attended Anthony Valenti deposition.	6.3
2021.04.10	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.04.10	Perez 2	YOK	Emails with court reporter re Ben Johnson depo transcript	0.1
2021.04.11	Perez 2	SAB	Prep for upcoming depositions	4.0
2021.04.12	Perez 2	DLS	Contacted Veritext and Esquire re transcripts	1.2
2021.04.12	Perez 2	JGM	Call Veritext	0.2
2021.04.12	Perez 2	JGM	Call w/DLS re: Deposition Transcripts	0.3
2021.04.12	Perez 2	JGM	Save Doc to Box - Deposition Transcripts, 7 file	0.1
2021.04.12	Perez 2	JGM	Print Deposition Transcript	0.1
2021.04.12	Perez 2	SAB	Updated chronology (2.3); teleconf. w/ Linda Kornfield at Blank Rome re potential experts (.6); prep for Markoutsis deposition (4.8)	7.7
2021.04.12	Perez 2	YOK	Assisted SAB with depo prep. Research re potential experts for retention.	5.4
2021.04.13	Perez 2	DLS	Followed up with transcripts	0.6
2021.04.13	Perez 2	JGM	Update Exhibits Folder for SAB	0.2
2021.04.13	Perez 2	JGM	Prepare Book for SAB (2)	0.3
2021.04.13	Perez 2	JGM	Call Esquire Deposition Solutinos re Depo Transcripts	0.3
2021.04.13	Perez 2	JGM	Print Deposition Transcript	0.1
2021.04.13	Perez 2	JGM	Print Motion for SAB	0.1
2021.04.13	Perez 2	JGM	Assist SAB w/Doc Preparation for Markotsis Deposition	2.3
2021.04.13	Perez 2	JGM	Format Deposition Transcript (txt version)	0.6

2021.04.13	Perez 2	SAB	Zoom conf. w/ [REDACTED] (1.0); teleconf. w/ Linda Kornfield and Y. Krivoshey re potential experts (.7); teleconf. w/ David Frangione re possible retention as a claims handling expert, set another call for Thursday at 4pm (.3); prep for Markoutsis deposition (7.5)	9.5
2021.04.13	Perez 2	YOK	Call with SAB and Ms. Kornfield re experts, and continued investigation re experts. Prep re Markoutsis deposition. Updated chronology.	6.9
2021.04.13	Perez 2	RSR	Contact D. Olson re N. Markoutsis document pull (0.2); run lodestar (.8)	1
2021.04.13	Perez 1	RSR	Run lodestar (1.6)	1.6
2021.04.14	Perez 2	DLS	Sent followup email re transcripts	0.1
2021.04.14	Perez 2	JGM	Print Deposition Transcript (2)	0.2
2021.04.14	Perez 2	JGM	Update Deposition Exhibits	0.2
2021.04.14	Perez 2	JGM	Organize Box Folder (Depositions)	0.6
2021.04.14	Perez 2	JGM	Call Esquire Deposition Solutions to Pay Invoice (2)	0.3
2021.04.14	Perez 2	JGM	Scan & Save Doc to Box - Invoice, 2 files	0.1
2021.04.14	Perez 2	JGM	Print Deposition Transcript (1)	0.1
2021.04.14	Perez 2	JGM	Deposition Support	1.4
2021.04.14	Perez 2	SAB	Prep for and take Markoutsis deposition (7.3); prep for tomorrow's Kizer deposition (3.3)	10.6
2021.04.14	Perez 2	YOK	Prepped for and participated on Markoutsis deposition, and assisted with prep re Kizer deposition.	9.8
2021.04.15	Perez 2	DLS	Prepared and filed public version of discovery brief	1
2021.04.15	Perez 1	DLS	Prepared and filed Form 32	0.9
2021.04.15	Perez 2	ESG	Exhibits Folders	2.2
2021.04.15	Perez 2	ESG	Deposition Exhibit Index Description	2.6
2021.04.15	Perez 2	JGM	Print Deposition Transcripts (4)	0.2
2021.04.15	Perez 2	JGM	Print & Organize Docs for Keizer Deposition (5)	0.5
2021.04.15	Perez 2	JGM	Update Calendar Entry	0.1
2021.04.15	Perez 2	JGM	Update Deposition Exhibit Index	0.1
2021.04.15	Perez 2	JGM	Update Deposition Exhibits	0.9
2021.04.15	Perez 2	JGM	Call Veritext re Deposition Transcript	0.2
2021.04.15	Perez 2	JGM	Print Markoutsis Deposition Transcript	0.2
2021.04.15	Perez 1	LTF	Discussed oral argument form with Debbie Schroeder and reviewed emails regarding same.	0.2
2021.04.15	Perez 2	SAB	prep for attend and take Kizer deposition (4.3); teleconf. w/ David Frangiamore re hiring him as a claims handling expert (1.3); analyzed transcript of Ellis deposition day 1 (2.3)	7.9
2021.04.15	Perez 2	YOK	Attended Kizer deposition and discussed same with SAB. Call with Frangiamore re exper retention. Assisted with prep re Ellis depo (day 2). Discussed filing public version of discovery letter re Williams deposition with Debbie Schroeder and SAB. Updated exhibit files and log.	8.2

2021.04.16	Perez 2	ESG	Deposition Exhibit Index Description	0.5
2021.04.16	Perez 2	ESG	Expert Witness Documents	0.8
2021.04.16	Perez 2	JGM	Update Exhibits Index for SAB	1.6
2021.04.16	Perez 2	JGM	Prepare Documents for David Frangiamore (Witness Expert)	1.8
2021.04.16	Perez 2	JGM	Call Esquire Deposition Solutions re Expedited Depo Transcripts	0.1
2021.04.16	Perez 2	JGM	Swap Deposition Exhibits with Labels	0.7
2021.04.16	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.2
2021.04.16	Perez 2	JGM	Deposition Support	1
2021.04.16	Perez 2	SAB	Prep for and attend continued Ellis deposition (7.8); began assembling materials for review by David Frangiamore (.7)	8.5
2021.04.16	Perez 2	YOK	Attended Ellis deposition and assisted SAB re same. Research re opposition to D's motion for reconsideration.	7.9
2021.04.17	Perez 2	SAB	Prep for upcoming depositions of A. Williams & B. Keith	4.0
2021.04.18	Perez 2	SAB	Prep for upcoming depositions of A. Williams & B. Keith	4.1
2021.04.19	Perez 2	JGM	Update Exhibits Index for SAB	1.6
2021.04.19	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.2
2021.04.19	Perez 2	JGM	Track & Print Deposition Transcript Errata	0.1
2021.04.19	Perez 2	JGM	Print Deposition Transcript for SAB	0.2
2021.04.19	Perez 2	JGM	Print Exhibits for David Frangiamore	2.8
2021.04.19	Perez 2	JIM	Confer with S. Bursor about litigation strategy and learnings from deposition testimony	0.6
2021.04.19	Perez 2	SAB	Analyzed Vol. 2 of Ellis deposition (3.0); prep for upcoming continuation of Williams deposition (2.7)	5.7
2021.04.19	Perez 2	YOK	Reviewed Williams depo errata. Worked on opposition to motion for reconsideration. Assisted with Williams depo prep.	5.8
2021.04.20	Perez 2	DLS	Downloaded transcript video	0.2
2021.04.20	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.3
2021.04.20	Perez 2	JGM	Scan Doc for SAB	0.1
2021.04.20	Perez 2	JGM	Check Deposition Link & Calendar Confirmation	0.1
2021.04.20	Perez 2	JGM	Create Calendar Entry	0.6
2021.04.20	Perez 2	JGM	Print Deposition Erratas	0.1
2021.04.20	Perez 2	SAB	Updated chronology (1.5); prep for continuation of Williams deposition (4.8); assembled materials for David Frangiamore (.6); analyzed Williams errata (.8)	7.7
2021.04.20	Perez 2	YOK	Continued working on opposition to motion for reconsideration, prepped re Williams deposition, continued research re expert issues. Emailed Veritext re scheduling and deposition info.	5.9
2021.04.20	Perez 1	RSR	Saved Appellant Reply to Perez 1 folder for [REDACTED] (.2)	0.2
2021.04.21	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.3

2021.04.21	Perez 2	SAB	Prep for and take continued Williams deposition (5.4); updated chronology (2.3)	7.7
2021.04.21	Perez 2	YOK	Attended Williams deposition and discussed same with SAB.	5
2021.04.21	Perez 1	RSR	Create new folder with hot docs for 4/22 investment presentation (6.8)	6.8
2021.04.22	Perez 2	JGM	Print Deposition Transcript for SAB	0.1
2021.04.22	Perez 2	JGM	Update Deposition Exhibit Index	0.4
2021.04.22	Perez 2	SAB	Zoom conf. w/ [REDACTED] (2.1); teleconf. w/ David Frangiamore & Y. Krivoshey re preparing expert report (2.2); analyzed volume 2 of Adam Williams deposition (2.5); wire payment to D. Frangiamore (.2)	6.8
2021.04.22	Perez 2	YOK	Call with SAB and Frangiamore re expert report. Continued working on opposition to motion for reconsideration.	3.3
2021.04.22	Perez 1	YOK	Discussed appeal issues with SAB and Rebecca Richter	0.5
2021.04.22	Perez 2	RSR	Sent requested dos to [REDACTED] (2)	2
2021.04.23	Perez 2	JGM	Call and relay message to SAB	0.3
2021.04.23	Perez 2	JGM	Create Calendar Entry & Call information for call w/D.	0.2
2021.04.23	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.3
2021.04.23	Perez 2	JGM	Print Deposition Transcripts (1)	0.2
2021.04.23	Perez 2	JGM	Print Doc for SAB	0.1
2021.04.23	Perez 2	SAB	Emails to [REDACTED] (.7); analyzed Chris Paff deposition (2.2); videoconf. w/ D. Frangiamore (2.5); videoconf. w/ Y. Krivoshey re litigation strategy (.8)	6.2
2021.04.23	Perez 2	YOK	Call with Frangiamore and SAB re expert report (2.5), and discussed next steps with SAB (.8), continued working on opposition to motion for reconsideration (2.3)	5.6
2021.04.24	Perez 2	SAB	Analyzed [REDACTED]	4.0
2021.04.25	Perez 2	SAB	Analyzed [REDACTED]	4.0
2021.04.26	Perez 2	LTF	Discussed litigation financing agreement with Yeremey Krivoshey and reviewed agreement and exchanged messages with Scott Bursor regarding same.	0.9
2021.04.26	Perez 2	SAB	Revised [REDACTED] (2.1); videoconf. w/ D. Frangiamore re expert analysis of Williams and Markoutsis depositions (3.9)	6.0
2021.04.26	Perez 2	YOK	Call with SAB and Frangiamore re expert report (3.9). Continued working on opp to motion for reconsideration (1.5)	5.4
2021.04.27	Perez 2	JGM	Send Invoice for Payment to RSR	0.2
2021.04.27	Perez 2	SAB	Prep for Bob Keith continued depo prep session (2.5); Videoconf. w/ Bob Keith & Amanda Griffith re depo prep (2.8); revised draft [REDACTED] (2.4)	7.7
2021.04.27	Perez 2	YOK	Continued working on opposition to motion for reconsideration.	5.6
2021.04.28	Perez 2	BER	Prepared for and attended Bob Keith deposition with SAB.	9.8
2021.04.28	Perez 2	JGM	Deposition Support Staff	3
2021.04.28	Perez 2	SAB	Bob Keith continued deposition (9.1); videoconf w. Y. Krivoshey to debrief re same (.3)	9.4
2021.04.28	Perez 1	SAB	Read appellant's letter re supp authority (.3); Revised draft letter responding re supplemental authority (.3)	0.6

2021.04.28	Perez 2	YOK	Call with SAB re Bob Keith depo (.3), and messages with BER re same (.2). Continued working on opposition to motion for reconsideration and emailed draft to SAB (7.0).	7.5
2021.04.28	Perez 1	YOK	Drafted response to RCA's notice of supplemental authority and emailed SAB re same.	1.3
2021.04.29	Perez 2	DLS	Prepared TOA/TOC	0.7
2021.04.29	Perez 1	DLS	Made edits and filed supplemental response letter	0.6
2021.04.29	Perez 2	JGM	Update Exhibits & Index	0.3
2021.04.29	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.3
2021.04.29	Perez 2	SAB	teleconf. w/ [REDACTED] (.7); videoconf. w/ D. Frangiamore and Y. Krivoshey re expert report (2.9); revised draft opposition to motion to stay (3.3); revised draft [REDACTED] (1.9)	8.8
2021.04.29	Perez 2	YOK	Call with SAB and Frangiamore re expert report (2.9), reviewed SAB's redlines to opp to motion to stay and added redlines, drafted SAB's declaration, and proposed order (4.8).	7.7
2021.04.29	Perez 1	YOK	Finalized response re letter re supplemental authority and discussed same with SAB and Debbie Schroeder.	1
2021.04.29	Perez 2	RSR	1pm call with SAB, EisnerAmper & Wood LLP (0.7)	0.7
2021.04.30	Perez 2	DLS	Updated TOA/TOC; finalized SAB declaration; brief and proposed order for filing	1
2021.04.30	Perez 2	JGM	Print Doc for SAB	0.1
2021.04.30	Perez 2	JGM	Call Esquire Deposition Solutions (re Pending Transcript)	0.4
2021.04.30	Perez 2	JGM	Pay Deposition Invoice	0.3
2021.04.30	Perez 2	LTF	Discussed opposition to motion to stay with Scott Bursor and Debbie Schroeder, reviewed brief, and filed documents.	0.8
2021.04.30	Perez 2	SAB	Revised draft reply re oppn to motion to stay (4.5); [REDACTED] (2.5)	7.0
2021.05.01	Perez 2	SAB	Analyzed deposition transcripts and draft expert report	4.0
2021.05.02	Perez 2	SAB	Analyzed deposition transcripts and draft expert report	4.0
2021.05.03	Perez 2	JGM	Print Deposition Transcripts (1)	0.2
2021.05.03	Perez 2	JGM	Print Deposition Exhibits (7)	0.1
2021.05.03	Perez 2	JGM	Update Deposition Box Folder	0.3
2021.05.03	Perez 2	LTF	Reviewed draft Frangiamore report.	0.6
2021.05.03	Perez 2	SAB	Analyzed draft expert report (2.5); teleconf. w/ [REDACTED] (.3); analyzed deposition transcripts and developed litigation and expert strategy (3.5)	6.3
2021.05.03	Perez 2	YOK	Analyzed deposition transcript from second Robert Keith deposition, and discussed same with SAB. Call with SAB re expert report, call with Frangiamore re same, provided Frangiamore with updated exhibits and transcripts, and updated document log.	4.1
2021.05.04	Perez 2	SAB	Analyzed draft expert report (3.0); developed litigation strategy (2.2); email to [REDACTED] (.2)	5.4
2021.05.04	Perez 2	YOK	Reviewed draft Frangiamore report and research re next steps.	2.1
2021.05.05	Perez 2	LTF	Reviewed draft Frangiamore report.	0.7
2021.05.05	Perez 2	SAB	Analyzed draft expert report	3.8

2021.05.05	Perez 2	YOK	Continued review of Frangiamore report and research re same.	1.2
2021.05.06	Perez 2	JGM	Create Zoom Meeting	0.2
2021.05.06	Perez 2	SAB	Analyzed draft expert report (3.9); revised draft [REDACTED] (2.5)	6.4
2021.05.07	Perez 2	JGM	Add TOC to Expert Report	0.6
2021.05.07	Perez 2	JGM	Pay Deposition Invoice	0.3
2021.05.07	Perez 2	SAB	Analyzed draft expert report (2.4); videoconf. w/ D. Frangiamore re same (.8); videoconf. w/ Linda Kornfeld, David Thomas, Julia Holt re potential coverage defenses (1.3); analyzed Johansen case re potential coverage defenses (.9); finalized [REDACTED] (1.5); email corresp w/ [REDACTED] (.3)	7.2
2021.05.07	Perez 2	YOK	Messaged SAB re expert report	0.1
2021.05.10	Perez 2	SAB	Revised draft Frangiamore expert report (7.0); read Defendant's reply brief in support of motion to stay (.5)	7.5
2021.05.10	Perez 2	YOK	Worked on Frangiamore report and messages with SAB re same.	4.5
2021.05.10	Perez 2	RSR	Formatted Fangiamore export report (.5)	0.5
2021.05.11	Perez 2	SAB	Revised draft Frangiamore expert report (11.2); zoom conf. w/ Frangiamore and Y. Krivoshey (.9)	12.1
2021.05.11	Perez 2	YOK	Worked on Frangiamore report, call with SAB and Frangiamore re report.	8.4
2021.05.12	Perez 2	SAB	Revised draft Frangiamore expert reort (10.2); videoconf. w/ D. Frangiamore and Y. Krivoshey re same (.5)	10.7
2021.05.12	Perez 2	YOK	Continued working on Frangiamore report and call with Frangiamore and SAB re same.	9.3
2021.05.13	Perez 2	SAB	Revised draft Frangiamore expert report	10.3
2021.05.13	Perez 2	YOK	Continued working on Frangiamore report and discussed same with SAB.	9.8
2021.05.14	Perez 2	DLS	Drafted proof of service	0.3
2021.05.14	Perez 2	LTF	Reviewed defendant's expert reports.	0.7
2021.05.14	Perez 2	MCS	Fixed table formatting on Frangiamore draft report, sent to YOK	0.5
2021.05.14	Perez 2	SAB	Revised draft Frangiamore expert report	10.1
2021.05.14	Perez 2	YOK	Worked on Frangiamore report. Reviewed IHIC's expert reports.	10.8
2021.05.15	Perez 2	SAB	Analyzed expert reports	4.0
2021.05.16	Perez 2	SAB	Analyzed expert reports	4.0
2021.05.17	Perez 2	ESG	Create Books	0.5
2021.05.17	Perez 2	JIM	Confer with S. Bursor about defendant's expert reports	0.8
2021.05.17	Perez 2	SAB	Reviewed Blank Rome retainer (.5); analyzed Ehrlich expert report (2.3); analyzed Goanos expert report (1.9); analyzed Lyew expert report (3.0)	7.7
2021.05.18	Perez 2	DLS	Drafted certificate of interested parties	0.7
2021.05.18	Perez 1	DLS	Drafted certificate of interested parties	0.5
2021.05.18	Perez 2	MCS	Insert SAB electronic signature into engagement letter, send to YOK and SAB.	0.5

2021.05.18	Perez 2	SAB	Analyzed expert reports (4.8); zoom conf. w/ Linda Kornfeld, [REDACTED] (.8); reviewed and executed Blank Rome retention and related documents and began onboarding Blank Rome lawyers (1.8)	7.4
2021.05.18	Perez 2	YOK	Analyzed IHIC's expert reports, call with Blank Rome attorneys and SAB re next steps, worked on certification of interested parties and discussed same with SAB and Debbie Schroeder.	3.9
2021.05.19	Perez 2	DLS	Filed certificate of interested parties	0.4
2021.05.19	Perez 1	DLS	Filed certificate of interested parties	0.4
2021.05.19	Perez 2	SAB	Onboarding Blank Rome lawyers (1.4); teleconf. w/ D. Frangiamore re same (.2); analyzed expert reports (5.2)	6.8
2021.05.19	Perez 2	YOK	Analyzed expert reports, and assisted with bringing Blank Rome attorneys up to speed	1.2
2021.05.20	Perez 2	JKV	Email exchange w/ YOK re: finding citations to list of cases in which D.Frangiamore provided expert testimony (.2)	0.2
2021.05.20	Perez 2	LTF	Call with expert and co-counsel regarding rebuttal reports and defendant's expert reports.	1.9
2021.05.20	Perez 2	YOK	Call with Frangiamore and cocounsel re rebuttal expert report, and analyzed IHIC expert reports. Discussed corrected Frangiamore report with Julia Venditti and Frangiamore.	5.2
2021.05.21	Perez 2	JKV	Call w/ D.Frangiamore re: case law expert testimony list (.2); Email exchange w/ YOK re: same (.1)	0.3
2021.05.21	Perez 2	JKV	Compiled all MSJ, class cert, & daubert briefings & orders re: same from underlying Rash Curtis case & sent in email attachments to D.Frangiamore; Fixing Frangiamore expert report page re: depo & trial testimony, adding case number & verifying citations, etc.	1.5
2021.05.21	Perez 2	JKV	Continued fixing Frangiamore expert report re: depo & trial testimony, adding case number & verifying citations, etc., and forwarded updated list of citations in email to YOK & SAB	3.4
2021.05.21	Perez 2	SAB	Analyzed expert reports and developed rebuttal strategy (6.8); responded to M. Stern discovery dispute email (.4)	7.2
2021.05.21	Perez 2	YOK	Discussed rebuttal expert report strategy and research re same. Worked on corrected Frangiamore report with Julia Venditti.	1
2021.05.21	Perez 2	RSR	Conf. w/ SAB and formatted Frangiamore report to add paragraph numbers (1.1)	1.1
2021.05.22	Perez 2	SAB	Analyzed expert reports and developed rebuttal strategy (3.0)	3.0
2021.05.23	Perez 2	SAB	Analyzed expert reports and developed rebuttal strategy(5.3)	5.3
2021.05.24	Perez 2	LTF	Assisted with re-filing certificate of interested entities and discussed with Debbie Schroeder.	0.3
2021.05.24	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	6.1
2021.05.25	Perez 2	JGM	Prepare Book for SAB	0.3
2021.05.25	Perez 2	JKV	Call w/ D.Frangiamore re: updated expert report (.1); Conf. w/ YOK re: same (.1)	0.2
2021.05.25	Perez 2	SAB	Corrected Frangiamore report to comply with local rules re formatting (.3); analyzed D's expert reports and developed rebuttal report (5.5)	6.8

2021.05.25	Perez 2	YOK	Finalized corrected Frangiamore report and discussed same with SAB. Analyzed IHIC's expert reports.	2.2
2021.05.26	Perez 2	SAB	Developed expert rebuttal report	5.0
2021.05.27	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	6.3
2021.05.28	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	5.7
2021.05.28	Perez 2	YOK	Emailed SAB re rebuttal expert report	0.1
2021.05.29	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	4.1
2021.05.30	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	4.2
2021.05.31	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	4.0
2021.06.01	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report	3.3
2021.06.01	Perez 2	YOK	Call with SAB and Blank Rome attnys re rebuttal strategy, and analyzed D's expert reports.	1.4
2021.06.02	Perez 2	SAB	Analyzed expert reports and drafted rebuttal report (5.8); teleconf. w/ Edward McKinnon re potential retention for expert rebuttal report (2.0)	7.8
2021.06.02	Perez 2	YOK	Call with SAB and potential expert re potential retention for rebuttal, and research re same.	1.6
2021.06.03	Perez 2	SAB	McKinnon retention (.3); analyzed expert reports and drafted rebuttal report (4.7); videoconf. w/ D. Frangiamore et al (2.6)	7.6
2021.06.03	Perez 2	YOK	Call with SAB and Dave Thomas with Frangiamore re rebuttal report and worked on rebuttal report.	3.5
2021.06.04	Perez 2	SAB	Analyzed expert reports, drafted rebuttal reports, and videoconfs. w/ D. Frangiamore and E. McKinnon re same	8.3
2021.06.04	Perez 2	YOK	Calls with Frangiamore and McKinnon re rebuttal reports, and worked on McKinnon rebuttal report.	4.7
2021.06.05	Perez 2	SAB	Analyzed expert reports, drafted rebuttal reports	4.0
2021.06.06	Perez 2	SAB	Analyzed expert reports, drafted rebuttal reports	4.0
2021.06.07	Perez 2	LTF	Discussed expert depositions with Scott Bursor and Yeremey Krivoshey and reviewed emails scheduling call to discuss next steps.	0.4
2021.06.07	Perez 2	SAB	Analyzed expert reports, drafted rebuttal reports (5.3); videoconf. w/ Y. Krivoshey re same (.4)	5.7
2021.06.07	Perez 2	YOK	Worked on McKinnon report and emailed Molly Sasseen.	6.4
2021.06.08	Perez 2	LTF	Call with co-counsel regarding settlement and staffing and follow up discussion with Scott Bursor and Yeremey Krivoshey regarding same.	0.9
2021.06.08	Perez 2	SAB	Revised draft Frangiamore rebuttal report (3.8); videoconf. w/ Y. Krivoshey re settlement strategy and draft McKinnon report (.7); developed settlement strategy (2.6); team meeting with [REDACTED] T. Fisher, Y. Krivoshey to discuss settlement strategy and staffing (.8); teleconf. w/ Max Stern re settlement negotiations, demanded [REDACTED] (.7); videoconf. w/ Y. Krivoshey and T. Fisher re settlement negotiations (.5); drafted email to [REDACTED] and full team re same (.4)	9.5



2021.06.08	Perez 2	YOK	Call with [REDACTED] and cocounsel re settlement and case scheduling, call with SAB re rebuttal report and settlement, continued working on McKinnon rebuttal report.	7.8
2021.06.09	Perez 2	SAB	revised draft expert rebuttal reports	7.0
2021.06.09	Perez 2	YOK	Continued working on McKinnon rebuttal report and emailed SAB re same. Call with SAB re expert rebuttal reports.	4.6
2021.06.10	Perez 2	SAB	revised draft expert rebuttal reports (4.1); analyzed insurance tower and developed settlement strategy (2.3)	6.5
2021.06.10	Perez 2	YOK	Call with McKinnon and worked on rebuttal report.	0.9
2021.06.11	Perez 2	SAB	revised draft expert rebuttal reports (3.9); developed settlement strategy (2.2); videoconf. w/ Y. Krivoshey, L. Kornfeld, D. Thomas re settlement strategy and expert discovery strategy (.6)	6.7
2021.06.11	Perez 2	YOK	Call with SAB and Blank Rome attnys re deposition scheduling and next steps, worked on McKinnon report.	1.1
2021.06.12	Perez 2	SAB	revised draft expert rebuttal reports	7.3
2021.06.14	Perez 2	DLS	Prepared TOC	0.4
2021.06.14	Perez 2	YOK	Worked on, finalized, and serve Frangiamore and McKinnon expert rebuttal reports.	4.8
2021.06.15	Perez 2	EMW	Printed and organized expert rebuttal reports for SAB (.4)	0.4
2021.06.15	Perez 2	LTF	Reviewed emails regarding deposition dates and video conference with Scott Bursor, Yeremey Krivoshey and Linda Kornfeld regarding deposition schedule.	0.6
2021.06.15	Perez 2	SAB	Analyzed rebuttal reports (5.6); team meeting w/ Linda Kornfeld, Tim Fisher, Y. Krivoshey re staffing expert depositions and re settlement strategy (.5); teleconf. w/ [REDACTED] re settlement strategy (.3); teleconf. w/ D. Frangiamore re deposition scheduling (.3); email to J. LaLonde re expert deposition scheduling (.2); teleconf. w/ M. Stern re settlement negotiations -- Max offered [REDACTED]; I disclosed Omni funding terms generally - [REDACTED] (1.0)	7.9
2021.06.15	Perez 2	YOK	Call with SAB and cocounsel to discuss deposition scheduling and strategy and mediation. Researched Judge Laporte for mediation, call with Judge Laporte's clerk re same, and emailed SAB and LTF re same. Call with McKinnon to prep for deposition.	1.8
2021.06.16	Perez 2	SAB	Analyzed rebuttal reports (5.2); teleconf. w/ [REDACTED] et al re settlement negotiations (.8)	6.0
2021.06.16	Perez 2	YOK	Call with SAB and [REDACTED] re mediation, and call with SAB re deposition scheduling.	0.5
2021.06.16	Perez 2	RSR	Printed Zurich and HCC insurance policies for SAB (.1)	0.1
2021.06.17	Perez 2	LTF	Reviewed emails regarding deposition scheduling and meeting with team regarding coverage of depositions and settlement.	0.6
2021.06.17	Perez 2	SAB	Teleconf. w/ M. Stern re settlement negotiations (.4); developed settlement strategy (1.3); teleconf. w/ [REDACTED] re settlement strategy (.4); prepared redacted funding agreement for use in settlement negotiations and negotiated mediation protections for redacted funding agreement (2.2); analyzed expert reports (2.6)	6.9

2021.06.17	Perez 2	YOK	Call with SAB and cocounsel re mediation and deposition scheduling, emailed SAB re same, call with McKinnon re deposition scheduling, call and email with Judge Laporte's clerk re mediation, strategized re deposition scheduling and reviewed emails re same.	1
2021.06.17	Perez 2	RSR	Assisted with redactions of [REDACTED] and Term Sheet	0.7
2021.06.19	Perez 2	SAB	Analyzed rebuttal reports (3.8); developed settlement strategy (.4)	4.2
2021.06.20	Perez 2	SAB	Analyzed rebuttal reports (4.3)	4.3
2021.06.21	Perez 1	YOK	Reviewed 9th Circuit order re appellate argument and emailed SAB re same.	0.1
2021.06.21	Perez 2	RSR	Organize IH insurance policies for SAB book (0.4)	0.4
2021.06.22	Perez 2	JGM	Save Doc to Box - Deposition Video, 5 files	0.2
2021.06.22	Perez 2	SAB	Analyzed expert rebuttal reports and developed settlement strategy, and videoconf. w/ Y. Krivoshey re same	4.1
2021.06.22	Perez 2	YOK	Discussed mediation issues with SAB. Called clerk for Judge Laporte and emailed SAB re mediation scheduling.	0.5
2021.06.23	Perez 2	SAB	Analyzed expert reports and developed SJ and settlement strategy	4.5
2021.06.24	Perez 2	LTF	Reviewed order on motion for reconsideration and exchanged messages with Yeremey Krivoshey regarding same (.2); reviewed emails regarding 7/29 mediation with Judge Laporte (.2).	0.4
2021.06.24	Perez 2	SAB	Analyzed expert reports and developed SJ and settlement strategy	5.3
2021.06.24	Perez 2	YOK	Messages with SAB re mediation, reviewed and filled out mediation paperwork. Reviewed order denying motion for reconsideration/motion to stay, and messaged LTF re same.	0.8
2021.06.25	Perez 2	MCS	Drafted and finalized notice of change of counsel (BER)	0.8
2021.06.25	Perez 2	SAB	Analyzed expert reports and developed SJ and settlement strategy	5.1
2021.06.26	Perez 2	SAB	Analyzed expert reports and developed SJ and settlement strategy	4.5
2021.06.26	Perez 2	YOK	Emailed RR re JAMS payment.	0.1
2021.06.27	Perez 2	SAB	Analyzed expert reports and developed SJ and settlement strategy	4.8
2021.06.28	Perez 2	SAB	Analyzed expert reports and developed SJ and settlement strategy	5.3
2021.06.29	Perez 2	SAB	Developed SJ strategy	4.3
2021.06.30	Perez 2	ESG	Answer Phone and Relay Message to SAB	0.2
2021.06.30	Perez 2	SAB	Developed SJ strategy (3.8); teleconf. w/ D. Frangiamore re preparation for upcoming expert deposition (.4)	4.2
2021.07.02	Perez 2	YOK	Reviewed emails re deposition scheduling from cocounsel and set up meeting for Monday.	0.2
2021.07.05	Perez 2	SAB	Zoom conf. w/ Linda Kornfeld and team to prep for Ehrlich deposition (2.0); prep for upcoming Frangiamore deposition (1.3); prep for upcoming mediation (2.1); developed SJ strategy (3.5); read Goanos deposition transcript (3.6)	12.5
2021.07.05	Perez 2	YOK	Call with SAB and cocounsel to prep for deposition and to discuss MSJ issues.	2
2021.07.06	Perez 2	DLS	Downloaded deposition exhibits and put on box	0.2
2021.07.06	Perez 2	DLS	Filed notice of change of counsel - Reed	0.4

2021.07.06	Perez 2	ESG	Mail Deposition Exhibit Boxes	0.1
2021.07.06	Perez 2	JGM	Prepare Shipping Label & Boxes to Mail Deposition Exhibit Boxes to SAB (2)	0.4
2021.07.06	Perez 2	YOK	Worked on cmc statement and discussed same with SAB. Reviewed Goanos depo docs, and emailed docs to Blank Rome for upcoming depositions.	4.1
2021.07.07	Perez 2	JGM	Call FedEx re SAB Boxes	0.2
2021.07.07	Perez 2	LTF	Reviewed emails regarding depositions of defendant's experts.	0.2
2021.07.07	Perez 2	YOK	Emailed SAB re mediation statement and strategized re same. Call re Ehrlich/Plitt depo.	1
2021.07.08	Perez 2	JGM	Set-up Zoom Call Info for D. Frangiamore Prep	1.4
2021.07.13	Perez 2	DLS	Made edit to signature block; finalized and emailed to Jeremy for review	0.2
2021.07.13	Perez 2	LTF	Reviewed orders on stipulations and updated calendar.	0.2
2021.07.13	Perez 2	SAB	Zoom conf. w/ Ed McKinnon and Mary Calkins re depo prep (2.8); drafted SJ premotion letter (4.8); revised draft CMC statement (2.3)	9.9
2021.07.13	Perez 2	YOK	Worked on CMC statement/reviewed SAB redlines to same.	0.5
2021.07.14	Perez 2	DLS	Filed CMC statement	0.3
2021.07.14	Perez 2	SAB	Prep for and Defended McKinnon deposition (8.3); revised draft SJ premotion letter (3.1); teleconf. w/ L. Kornfeld et al re prep for Lyew deposition (1.1)	12.5
2021.07.14	Perez 2	YOK	Emailed Blank Rome re deposition exhibit issue. Reviewed and suggested edits to pre-motion letter re MSJ.	1.2
2021.07.15	Perez 2	LTF	Discussed case status with Jeremy Krivoshey and Scott Bursor.	0.2
2021.07.19	Perez 2	YOK	Research re depo topics and emails with Blank Rome re same. Reviewed summary of McFarland depo.	1.3
2021.07.22	Perez 2	DLS	Assisted Judy with preparing hard copies of mediation docs to be delivered by mail	0.4
2021.07.22	Perez 2	JMF	Mailed filings to judge.	0.6
2021.07.22	Perez 2	LTF	Reviewed emails regarding settlement and exchanged messages with Jeremy Krivoshey regarding same.	0.3
2021.07.22	Perez 2	YOK	Finalized and served mediation brief. Emails with cocounsel re same. Call with team re mediation and emailed SAB and team re settlement issues.	2.8
2021.07.23	Perez 2	DLS	Call with Jeremy; finalized and filed pre-filing letter	0.5
2021.07.23	Perez 2	LTF	Reviewed defendant's mediation statement and reviewed emails regarding settlement and discussed same with Jeremy Krivoshey.	0.8
2021.07.23	Perez 2	YOK	Multiple calls with SAB and team re mediation and settlement, research re MSJ issues and settlement issues, and emailed team re same. Worked on pre-motion MSJ letter and calls with Blank Rome re same, finalized and assisted with filing same.	8.1
2021.07.25	Perez 2	YOK	Reviewed D's pre-motion MSJ letter, research re opposition for same, and emailed SAB re same.	2.1
2021.07.26	Perez 2	LTF	Discussed settlement with Jeremy Krivoshey and email exchange with Scott Bursor and Blank Rome lawyers and assisted with filing stipulation vacating deadlines and setting 8/10 CMC.	1.1

2021.07.26	Perez 2	YOK	Calls with SAB, LTF, Debbie Schroeder re settlement, and call with [REDACTED] re same. Discussed next steps with SAB. Reviewed, finalized, and assisting with filing stipulation re same. Call with defense counsel re stipulation re MSJ.	2
2021.07.27	Perez 2	JGM	Scan & Email - Invoices to RSR (Equire Depositions & Claims Resource Mangement, Inc.)	0.2
2021.07.27	Perez 2	JGM	Respond Email from RSR re Deposition Expense Details	0.2
2021.07.27	Perez 2	RSR	Prepared case expenes for SAB; conf. w/ YOK re same (1.2)	1.2
2021.07.28	Perez 2	YOK	Calls with SAB and Colin Weir re plans for distribution, and research re plan for distribution of settlement. Discussed same with YZK.	4.7
2021.07.28	Perez 2	RSR	Prepared lodestar and updated expense summary (.3)	0.3
2021.07.29	Perez 2	YOK	Calls with Anya Verkhovskaya re updating class contact info. Call with SAB re next steps. Reviewed settlement agreement. Continued research re administration/distribution of the settlement.	5.1
2021.07.29	Perez 1	YOK	Emailed KCC re updating case website and gathered orders and filings for same.	0.5
2021.07.30	Perez 2	LTF	Reviewed draft settlement agreement and emails regarding same.	0.4
2021.07.30	Perez 2	YOK	Call with Anya Verkhovskaya re updating class member info. Reviewed redlines to settlement agreement.	0.8
2021.08.02	Perez 2	YOK	Emails with CEG re updating class member contact info.	0.2
2021.08.03	Perez 1	YOK	Worked on motion to approve distribution/allocation plan. Worked in Anya Verkhovskaya to get updated email addresses.	7.1
2021.08.04	Perez 2	YOK	Reviewed redlined settlement and messaged SAB re same.	0.3
2021.08.04	Perez 1	YOK	Continued working on motion to approve allocation and distribution plan. Reviewed Colin Weir's analysis of class member data. Reviewed Verkhovskaya's updated email append.	5.5
2021.08.05	Perez 2	YOK	Call with Perez re settlement, and emails with him re same. Reviewed emails re settlement.	1
2021.08.05	Perez 1	YOK	Continued working on motion to approve allocation/distribution and emails with Verkhovskaya re same. Emailed draft of brief to SAB.	7.1
2021.08.06	Perez 2	YOK	Reviewed emails re settlement, and emailed SAB re same.	0.3
2021.08.06	Perez 1	YOK	Continued working on motion to approve distribution and allocation plan. Worked on motion to approve notice plan and proposed notice exhibit/template. Emails and call with SAB re same.	5.9
2021.08.08	Perez 2	YOK	Email with SAB re Perez signature, messages with Perez re same.	0.4
2021.08.09	Perez 2	YOK	Emails re settlement and worked on distribution issues.	1
2021.08.10	Perez 2	JGM	Scan & Send to RSR - Invoice, 1 file	0.1
2021.08.10	Perez 2	LTF	Attended status conference and discussed same with Scott Bursor and Yeremey Krivoshey afterwards.	0.4
2021.08.10	Perez 2	SAB	Settlement negotiations, prep for CMC, revised draft motion for approval of plan of distribution; attended CMC; reviewed proposals from claim administrators	12.7

2021.08.10	Perez 2	YOK	Prepped for and participated at CMC. Calls with SAB and LTF re same. Messages with Perez re settlement. Reviewed updated data from Anya Verkhovskaya and forwarded it to SAB and Colin Weir.	2
2021.08.10	Perez 1	YOK	Research re distribution issues and emailed SAB re same.	0.8
2021.08.11	Perez 2	SAB	Settlement negotiations and draft motion re plan of distribution	12.3
2021.08.11	Perez 1	YOK	Worked on distribution motion and communications with SAB, Anya Verkhovskaya, Perez, Molly Sasseen re same.	2
2021.08.11	Perez 2	RSR	Formatted Draft Distribution Motion (.4)	0.4
2021.08.11	Perez 2	RSR	Prepared Claims Administration Proposal book (.4)	0.4
2021.08.11	Perez 1	RSR	Formatted Draft Distribution Motion (.4)	0.4
2021.08.12	Perez 2	DLS	Finalized and filed transcript order; prepared check for CSR	0.5
2021.08.12	Perez 2	SAB	Revised draft motion re plan of distribution	12
2021.08.12	Perez 2	YOK	Messages with Perez and [REDACTED] re settlement. Messages with defense counsel re same. Discussed same with Molly Sasseen. Reviewed settlement docs and communications.	0.9
2021.08.12	Perez 1	YOK	Call with SAB and Rebecca Richter re distribution motion. Messaged Anya Verkhovskaya and Colin Weir re expenses. Call with Linda Kornfeld and Ed McKinnon re invoices.	0.8
2021.08.12	Perez 2	RSR	Scan and save SAB notes re settlement (.1); conf. w/ SAB and YOK re Distribution Motion due 8/20 (.2)	0.3
2021.08.13	Perez 2	BSS	Reviewed email re: time records (0.1)	0.1
2021.08.13	Perez 2	YOK	Calls with Perez and emails re settlement, emails with defense counsel re same.	0.8
2021.08.13	Perez 1	YOK	Call with Colin Weir re updated class info, and worked on distribution motion.	0.6
2021.08.13	Perez 2	RSR	Began preparing time and expense submission for 8/20 Distribution Motion (3.2)	3.2
2021.08.14	Perez 2	LTF	Reviewed transcript and circulated it to Scott Bursor and Yeremey Krivoshey.	0.3
2021.08.16	Perez 2	SAB	Revised draft motion re plan of distribution	11.7
2021.08.16	Perez 1	YOK	Worked on Bursor declaration in support of distribution motion, worked on proposed order re same, and discussed same with SAB.	3
2021.08.16	Perez 2	RSR	Updated Iodestar and expenses for Distribution Motion (2); conf. w/ SAB and YOK re filing materials for Distribution Motion (.2)	2.2
2021.08.17	Perez 2	JGM	Call and relay message to SAB	0.1
2021.08.17	Perez 2	LTF	Reviewed draft Bursor declaration and emails regarding declaration and motion.	0.6
2021.08.17	Perez 2	SAB	Revised draft motion re plan of distribution	10.8
2021.08.17	Perez 2	RSR	Update time and expenses for Distribution Motion (5.5); conf. w/ YOK re same (.1); conf. w/ SAB re 1099s (.1); pulled exhibits for Bursor Decl (0.3)	6
2021.08.17	Perez 1	YOK	Worked on distribution motion and SAB declaration, and call and messages with SAB and Rebecca Richter re same. Reviewed D's redlines to proposed order and brief.	4.7

2021.08.18	<i>Perez 2</i>	RSR	Continue working on time and expenses for Distributio Motion (.8); prepared Claim Admin proposal book for SAB (.2); made SAB edits to Distribution Motion (0.3); assisted with draft Administrator declaration (1)	2.3
2021.08.18	<i>Perez 2</i>	SAB	Revised draft motion re plan of distribution	6.8
2021.08.18	<i>Perez 1</i>	YOK	Call with SAB re distribution motion. Edited SAB declaration and proposed order, and sent revised proposed order to defense counsel. Discussions with RR re SAB declaration and lodestar calculations.	2.5



**B&F HOURLY RATES**

(As of 8/17/2021)

**2021**

<b>Timekeeper (Class Year) (Title)</b>	<b>2021 Rate</b>
Scott A. Bursor (1997) (Partner)	\$1,000
L. Timothy Fisher (1997) (Partner)	\$1,000
Joseph I. Marchese (2002) (Partner)	\$900
Joel D. Smith (2006) (Partner)	\$850
Josh D. Arisohn (2007) (Partner)	\$825
Sarah N. Westcot (2009) (Partner)	\$800
Neal J. Deckant (2011) (Partner)	\$750
Yitz Z. Kopel (2012) (Partner)	\$725
Yeremey O. Krivoshey (2013) (Partner)	\$700
Frederick J. Klorczyk (2013) (Partner)	\$700
Philip L. Fraietta (2014) (Partner)	\$675
Rachel L. Miller (2015)	\$500
Alec M. Leslie (2016) (Associate)	\$450
Andrew J. Obergfell (2016) (Associate)	\$450
Blair E. Reed (2017) (Associate)	\$375
Stephen A. Beck (2018) (Associate)	\$350
Brittany S. Scott (2019) (Associate)	\$325
Max S. Roberts (2019) (Associate)	\$325
Sean Litteral (2019) (Associate)	\$325
Matthew A. Girardi (2020) (Associate)	\$325
Julian C. Diamond (2020) (Associate)	\$325
Julia K. Venditti (2020) (Associate)	\$325
Christopher Reilly (2020) (Associate)	\$325
Debbie L. Schroeder (Senior Litigation Support Specialist)	\$300
Rebecca S. Richter (Senior Litigation Support Specialist)	\$300
Erin M. Wald (Senior Litigation Support Specialist)	\$300
J. Georgina McCulloch (Senior Litigation Support Specialist)	\$275
Molly C. Sasseen (Senior Litigation Support Specialist)	\$275
Steven E. Riley (Litigation Support Specialist)	\$250
Judy Fontanilla (Litigation Support Specialist)	\$250
Amanda Larson (Litigation Support Specialist)	\$250
Amy S. Michel-Arce (Litigation Support Specialist)	\$250
Erike S. Grossbard (Litigation Support Specialist)	\$250





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LAW April 9, 2013, 4:48 p.m. ET

# On Sale: The \$1,150-Per-Hour Lawyer

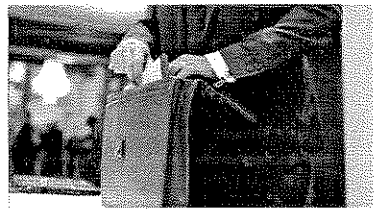
Lawyer Fees Keep Growing, But Don't Believe Them. Clients Are Demanding, and Getting, Discounts

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By JENNIFER SMITH

Top partners at leading U.S. law firms are charging more than ever before, yet those hourly rates aren't all they appear to be.



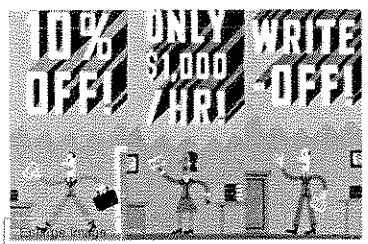
Top partners at leading U.S. law firms are charging more than ever — routinely \$1,150 or more an hour — but after discounts and write-offs the nosebleed rates aren't all they appear to be. Jennifer Smith reports. Photo: Getty Images.

Having blown past the once-shocking price tag of \$1,000 an hour, some sought-after deal, tax and trial lawyers are commanding hourly fees of \$1,150 or more, according to an analysis of billing rates compiled from public filings.

But, as law firms boost their standard rates, many are softening the blow with widespread discounts and write-offs, meaning fewer clients are paying full freight. As a result, law firms on

average are actually collecting fewer cents on the dollar, compared with their standard, or "rack," rates, than they have in years.

Think of hourly fees "as the equivalent of a sticker on the car at a dealership," said legal consultant Ward Bower, a principal at Altman Weil Inc. "It's the beginning of a negotiation....Law firms think they are setting the rates, but clients are the ones determining what they're going to pay."



James Kaczean

Star lawyers still can fetch a premium, and some of them won't budge on price. The number of partners billing \$1,150-plus an hour has more than doubled since this time last year, according to Valeo Partners, a consulting firm that maintains a database of legal rates pulled from court filings and other publicly disclosed information. More than 320 lawyers in

the firm's database billed at that level in the first quarter of 2013, up from 158 a year earlier.

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That gilded circle includes tax experts such as Christopher Roman of King & Spalding LLP and Todd Maynes of Kirkland & Ellis LLP, intellectual-property partner Nader A. Mousavi of Sullivan & Cromwell LLP, and deal lawyers such as Kenneth M. Schneider of Paul, Weiss, Rifkind, Wharton & Garrison LLP.

Those lawyers and their firms either declined to comment or didn't reply to requests for comment.

When corporate legal departments need a trusted hand to fend off a hostile takeover or win a critical court battle, few general counsels will nitpick over whether a key lawyer is charging \$900 an hour or \$1,150 an hour. But for legal matters where their future isn't on the line, companies are pushing for—and winning—significant price breaks.

"We almost always negotiate rates down from the rack rates," said Randal S. Milch, general counsel for phone giant [Verizon Communications Inc.](#) [VZ +0.29%] The result, he said, is a "not-insignificant discount."

For the bread-and-butter work that many big law firms rely on, haggling has become the norm. Many clients grew accustomed to pushing back on price during the recession and continue to demand discounts.

Some companies insist on budgets for their legal work. If a firm billing by the hour exceeds a set cap, lawyers may have to write off some of that time.

Other clients refuse to work with firms who don't discount, lopping anywhere from 10% to 30% off their standard rates. Some may grant rate increases to individual partners or associates they deem worthy. Another tactic: locking in prices with tailored multiyear agreements with formulas governing whether clients grant or refuse a requested rate increase.

In practical terms, that means the gap between law firms' sticker prices and the amount of money they actually bill and collect from their clients is wider than it has been in years.

According to data collected by Thomson Reuters Peer Monitor, big law firms raised their average standard rate by about 9.3% over the past three years. But they weren't able to keep up on the collection side, where the increase over the same period was just 6%. Firms that used to collect on average about 92 cents for every dollar of standard time their lawyers worked in 2007, before the economic downturn, now are getting less than 85 cents. "That's a historic low," said James Jones, a senior fellow at the Center for the Study of the Legal Profession at Georgetown Law.

To be sure, things have certainly picked up some since the recession, when some clients flat-out refused to pay rate increases.

In the first quarter of 2013, the 50 top-grossing U.S. law firms boosted their partner rates by as much as 5.7%, billing on average between \$879 and \$882 an hour, according to Valeo Partners. Rates for junior lawyers, whose labors have long been a profit engine for major law firms, jumped even more.

While some clients resisted using associate lawyers during the downturn, refusing to pay hundreds of dollars an hour for inexperienced first- or second-year attorneys, the largest U.S. law firms have managed to send the needle back up again. This year, for the first time, the average rate for associates with one to four years of experience rose to \$500 an hour, according to Valeo.

The increases continue the upward trend of 2012, when legal fees in general rose 4.8% and associate billing rates rose by 7.4%, according to a coming report by TyMetrix Legal Analytics, a unit of [Wolters Kluwer](#), [WKL.AE +0.95%] and CEB, a research and advisory-services company. Those numbers are based on legal-spending data from more than 17,000 law firms.

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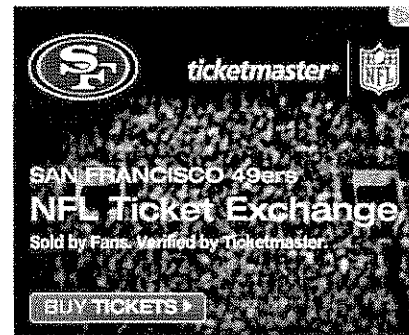
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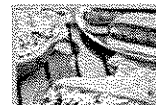


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More than a dozen leaders at major law firms declined to discuss rate increases on the record, though some said privately that the increase in associate rates could be caused in part by step increases as junior lawyers gain in seniority.

Joe Sims, an antitrust partner at Jones Day and former member of the firm's partnership committee, said clients don't mind paying for associates, as long as they feel they are getting their money's worth.

Sophisticated clients, he said, tend to focus on the overall price tag for legal work, not on individual rates. "They are more concerned about how many people are working on the project and the total cost of the project," Mr. Sims said. "Clients want value no matter who is on the job."

While a handful of elite lawyers have successfully staked out the high end—the deal teams at Wachtell, Lipton, Rosen & Katz, for example—legal experts say that client pressure to control legal spending means most law firms must be considerably more flexible on price.

"There will always be some 'bet the company' problem where a client will not quibble about rates," said Mr. Jones, the Georgetown fellow. "Unfortunately, from the law firms' standpoint, that represents a small percentage of the work."

Write to Jennifer Smith at [jennifer.smith@wsj.com](mailto:jennifer.smith@wsj.com)

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April 16, 2012 5:20 PM

### When It Comes to Billing, Latest Rate Report Shows the Rich Keep Getting Richer

Posted by Sara Randazzo

Hourly rates just keep rising—and the best-paid lawyers are raising their rates faster than everyone else.

Those are two of the key findings contained in the [2012 Real Rate Report](#), an analysis of \$7.6 billion in legal bills paid by corporations over a five-year period ending in December 2011. The report, released Monday, is the second such collaboration between TyMetrix, a company that manages and audits



legal bills for corporate legal departments, and the Corporate Executive Board.

Many of the new rate report's findings echo those contained in the 2010 study, including the fact that rates keep going up, almost across the board, and that the cost of a given matter can vary dramatically depending on a law firm's size and location and its relationship with a particular client.

At the same time, this year's study shows that the legal sector is becoming increasingly bifurcated, with top firms raising rates faster than those at the bottom of the market and large firms charging a premium price based purely on their size.

"What it's really showing is that there's an increased premium being paid for experience and expertise," says Julie Peck, vice president of strategy and market development at TyMetrix. "Some parts of the lawyer market are able to raise rates much more quickly, and are more impervious to economic forces than others."

To compile the current rate report, TyMetrix received permission from its clients to examine legal fees billed to 62 companies across 17 industries including energy, finance, retail, technology, insurance, and health care. The bills, which represent the amount actually paid by the companies in question rather than the amount initially charged, came from more than 4,000 firms in 84 metropolitan areas around the country. Every firm on the 2011 Am Law 100 is represented in the data.

The report's key data points include:

**A Widening Gap:** Hourly rates charged by lawyers in the legal sector's upper echelon grew faster between 2009 and 2011 than those charged by lawyers toiling on the lower rungs. Particularly striking was the jump in associate rates billed by those falling in the report's top quartile: 18 percent on average, to just over \$600 per hour. Rates billed by top quartile partners, meanwhile, rose 8 percent, to just under \$900 per hour. In the bottom quartile, associate rates rose 4 percent and partner rates rose 3 percent during the same period.

**The Recession's (Minor) Toll:** Even amid the economic downturn, the cost of an hour of a lawyer's time continued to rise faster than key measures of inflation. That said, the legal industry wasn't completely immune to the broader economy's slowdown. After rising 8.2 percent between 2007 and 2008, hourly rates rose just 2.3 percent in 2009. Law firms bounced back a bit last year, with rates climbing 5.1 percent, to an average of \$530 an hour.

**Location Counts:** Not surprisingly, lawyers working in major metropolitan areas—where, as the rate report notes, rents are typically higher—are the priciest. An address in Boston, Chicago, Los Angeles, San Francisco, or Washington, D.C., alone adds about \$161 to the hourly rate charged by an individual lawyer. Those six cities and Baltimore, Houston, Philadelphia, and San Jose are the ten U.S. markets with the highest hourly rates. With an average partner rate topping \$700 per hour and average associate rate of more than \$450 per hour, New York is the most expensive market in the country. The least expensive? Riverside, California, where the average partner bills at under \$250 per hour and associates bill at just over \$300 an hour.

**In the Minority:** A small group of lawyers—12 percent—bucked the trend toward higher fees and actually lowered rates between 2009 to 2011—and 3 percent trimmed rates by \$50 or more per hour. (Most of those in the rate-cutting camp were based outside the big six markets identified above.) At the other end of the spectrum, 52 percent of lawyers increased rates by between \$25 and \$200 or more per hour. Another 18 percent increased rates by less than \$25 per hour, and the final 18 percent held rates steady.

**First-Year Blues:** Even before the recession hit, clients balked at paying for what they considered on-the-job training for first-year associates. The latest rate report is likely to reinforce that reluctance, given its finding that using entry-level lawyers adds as much as 20 percent to the cost of a legal matter. The report offers evidence that firms may be accommodating clients on this front: The percentage of bills attributed to entry-level associates dropped from 7 percent in 2009 to 2.9 percent last year.

**Ties That Bind:** The more work one firm handles for a client—and the longer the client relationship extends—the higher the average rate the firm charges. For companies that paid one firm \$10 million or more in a single year, the average hourly rate paid was \$553 in 2011. By comparison, clients that limited their spending on an individual firm to \$500,000 paid that firm an average of \$319 per hour.

**Four-Digit Frontier:** Data has consistently shown that many lawyers hesitate to charge more than \$1,000 an hour, and in 2011 just under 3 percent of the lawyers covered by the rate report had broken that barrier. Of those, the vast majority were working in the six main legal markets identified above and 60 percent of the time, they billed in increments of one hour or less.

**Playing Favorites:** Across all practice areas, 90 percent of lawyers charged different clients different rates for similar types of work. (The figure for mergers and acquisitions lawyers was 100 percent.) The differences from client to client can be extreme, and were even more pronounced in the current report than in the 2010 edition. Rates charged by intellectual property specialists, for instance, had a median variance of 23.1 percent, while lawyers doing commercial and contract work showed a 18.7 percent median difference.

**Who's Doing What?** A closer look at law firm bills for work performed on litigation and intellectual property assignments shows that the kind of timekeeper billing on a matter varies by practice type. On patent matters, the report shows, 47 percent of hours billed on average are attributed to paralegals, and 37 percent by partners. By comparison, paralegals account for just 8 percent of the work done on labor and employment litigation hours, while partners handle 45 percent.

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## Top Billers

Top attorneys in the U.S. are asking for as much as \$1,250 an hour, according to recent court filings, significantly more than in previous years, as they take advantage of big clients willing to pay top dollar even amid the downturn. The move is contributing to price inflation across the struggling \$100 billion global corporate law firm industry, where lawyers often study rival attorney fee filings in bankruptcy cases. See which attorneys had some of the highest-known hourly rates in 2010 and 2009. Click on column headers to sort.

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Racke, Kirk A.	Kirkland & Ellis LLP	Corporate			\$1,250	Reader's Digest Association Inc	2010
Taplin, Ish	Kirkland & Ellis LLP	Tax			\$1,220	Vision Corp.	2010
Schmidt, Gerhard	Wells Fargo	Finance	Corporate	Mergers and Acquisition	\$1,165	Aeris International	2010
Gon, Michelle Y.L.	Baker McKenzie	Real Estate	Mergers and Acquisition	Intellectual Property	\$1,163	Morris Liquidation Company	2010
Shuzar, Andrew	Cleary Gottlieb	Bankruptcy			\$1,160	Truvo	2010
McDonald, Michael	Cleary Gottlieb	Corporate	Mergers and Acquisition		\$1,160	Truvo	2010
Vandemeersch, Dirk	Cleary Gottlieb	Environmental Litigation	Litigation		\$1,130	Truvo	2010
Reding, Jacques	Cleary Gottlieb	Bankruptcy	Mergers and Acquisition	Equities	\$1,130	Truvo	2010
McArdle, Wayne P.	Gibson Dunn	Corporate			\$1,110	Lehman Brothers Holding Inc	2010
DuBois, Pierre-Alexandre	Kirkland & Ellis LLP	Intellectual Property			\$1,105	Reader's Digest Association Inc	2010
Scheller, Brad	Fried Frank	Bankruptcy			\$1,100	Station Casinos	2010
Lewin-Smith, Guy	Debevoise & Plimpton LLP	Corporate			\$1,080	MIG Inc	2010
Brown, Michael	Jones Day	Finance	Litigation	Regulatory	\$1,075	Lehman Brothers Holding Inc	2010
Coffey, Lee	Jones Day	Litigation	International Law	Energy	\$1,075	Lehman Brothers Holding Inc	2010
Stueck, Barnaby C.	Jones Day	Bankruptcy			\$1,075	Lehman Brothers Holding Inc	2010
Kortan, Michael A.	Gibson Dunn	Litigation			\$1,075	Airbics	2010
Brockway, David	Bingham McCutchen	Corporate			\$1,065	Lehman Brothers Holding Inc	2010
Magee, John B.	Bingham McCutchen	Tax			\$1,065	Lehman Brothers Holding Inc	2010
Nelson, William F.	Bingham McCutchen	Tax			\$1,065	Lehman Brothers Holding Inc	2010
Pisliko, Bernie	Shearman & Sterling LLP	Tax			\$1,065	Worldspace	2010
Meyerson, Lee	Simpson Thacher	Capital Markets	Mergers and Acquisition		\$1,050	Washington Mutual	2010
Nesgos, Polar	Milbank Tweed	Finance			\$1,050	Sea Launch Company	2010
Clayton, Lewis	Paul Weiss	Intellectual Property			\$1,050	SP Wind Down Inc	2010
Flader, Robert	Paul Weiss	Labor and Employment			\$1,050	SP Wind Down Inc	2010
Reizenberg, Peter	Paul Weiss	Corporate	Tax		\$1,050	SP Wind Down Inc	2010
Baronsky, Kenneth J	Milbank Tweed	Bankruptcy	Mergers and Acquisition	Securities Litigation	\$1,050	Station Casinos	2010
Palmer, Deryck A.	Cadwalder	Finance	Bankruptcy	Mergers and Acquisition	\$1,050	Lyondell Chemical Company	2010
Aronzon, Paul	Milbank Tweed	Bankruptcy			\$1,050	Lehman Brothers Holding Inc	2010

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Duhne, Dennis	Mitbank Tweed	Bankruptcy			\$1,050	Lehman Brothers Holding Inc	2010
Schiff, Kenneth E.	Weil Gotshal	Mergers and Acquisitions			\$1,030	Essexed Stay Inc	2010
Kar, Partha	Kirkland & Ellis LLP	Bankruptcy			\$1,030	Reader's Digest Association Inc	2010
Budd, Thomas M.	Gibson Dunn	Finance			\$1,027	Lehman Brothers Holding Inc	2010
Moore, Robert Jay	Mitbank Tweed	Bankruptcy			\$1,025	Calm Jumper	2010
Dakin-Grimm, Linda	Mitbank Tweed	Litigation			\$1,025	Lehman Brothers Holding Inc	2010
Davis, Trayton M.	Mitbank Tweed	Finance	Bankruptcy	Investment Funds Litigation	\$1,025	Lehman Brothers Holding Inc	2010
Grushkin, Jay D.	Mitbank Tweed	International Law	Finance	Transportation	\$1,025	Lehman Brothers Holding Inc	2010
Heiler, David S.	Latham Watkins	Bankruptcy			\$1,025	In re: NEC Holdings Corp.	2010
Hershtald, Michiel	Mitbank Tweed	Tax	Real Estate	Finance	\$1,025	Lehman Brothers Holding Inc	2010
Magob, Rainer	Mitbank Tweed	Finance			\$1,025	Lehman Brothers Holding Inc	2010
Tomback, Andrew E.	Mitbank Tweed	Litigation	Finance		\$1,025	Lehman Brothers Holding Inc	2010
Sharp, Richard	Mitbank Tweed	Litigation			\$1,025	Lehman Brothers Holding Inc	2010
Clowry, Kait J.K.	Paul Hastings	Corporate			\$1,021	Lehman Brothers Holding Inc	2010
Eagan, Mark J.	Paul Hastings	Real Estate			\$1,021	Lehman Brothers Holding Inc	2010
O'Sullivan, Ronan P.	Paul Hastings	Corporate	Real Estate		\$1,021	Lehman Brothers Holding Inc	2010
Lifson, Richard S.	Cleary Gottlieb	Corporate	Finance	Mergers and Acquisition	\$1,020	Truve	2010
Dunbar, James A.	Cleary Gottlieb	Finance	Tax		\$1,020	Truve	2010
Passio, James	Cleary Gottlieb	Tax			\$1,020	Truve	2010
Gorin, William F.	Cleary Gottlieb	Corporate	Government	Capital Markets	\$1,020	Truve	2010
Moloney, Thomas J.	Cleary Gottlieb	Bankruptcy	Litigation	Finance	\$1,020	Truve	2010

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Top attorneys in the U.S. are asking for as much as \$1,250 an hour, according to recent court filings, significantly more than in previous years, as they take advantage of big clients willing to pay top dollar even amid the downturn. The move is contributing to price inflation across the struggling \$100 billion global corporate law firm industry, where lawyers often study rival attorney fee filings in bankruptcy cases. See which attorneys had some of the highest-known hourly rates in 2010 and 2009. Click on column headers to sort.

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Aleksander, Nicholas P.B.	Gibson Dunn	Tax			\$1,018	Lehman Brothers Holding Inc	2010
Rocher, Philip	Gibson Dunn	Litigation			\$1,018	Lehman Brothers Holding Inc	2010
Thomas, Andrew S.V.	Gibson Dunn	Corporate			\$1,018	Lehman Brothers Holding Inc	2010
Blyth, Mark	Litigators	Litigation			\$1,010	NorTel Networks	2010
Cox, Tim	Litigators	Corporate			\$1,018	NorTel Networks	2010
Sachdev, Nabeel V.	Kirkland & Ellis LLP	Corporate			\$1,015	Vistacon Corp.	2010
Mayo, David	Paul Weiss	Tax			\$1,015	BP Wind Down Inc	2010
Cohen, Joel	Gibson Dunn	Bankruptcy			\$1,014	Almatis	2010
Sullivan, Peter	Gibson Dunn	Intellectual Property	Litigation		\$1,014	Almatis	2010
Trinklein, Jeffrey	Gibson Dunn	Tax	Employee Benefits	Energy	\$1,014	Almatis	2010
Vance, Janet L.	Gibson Dunn	Finance	Corporate		\$1,014	Almatis	2010
Buffone, Steven P.	Gibson Dunn	Energy	Corporate	Finance	\$1,008	Almatis	2010
Jewell, Justin S.	Paul Hastings	Finance			\$1,004	Lehman Brothers Holding Inc	2010
Gander, Fred R.	Dewey LeBoeuf LLP	Finance	Tax	Corporate	\$1000	Ambac	2010
Vyskocil, Mary Kay	Simpson Thacher	Insurance	Litigation		\$1000	Washington Mutual	2010
Brown, Avri	Simpson Thacher	Employee Benefits	Executive Compensation		\$1000	American Safety Razor Company	2010
Etherton, Ugarne	Weil Gotshal	Mergers and Acquisitions			\$1000	Lehman Brothers Holding Inc	2010
McCahill, Dominic T.	Weil Gotshal	Bankruptcy			\$1000	Lehman Brothers Holding Inc	2010
Tringali, Joseph F.	Simpson Thacher	Litigation	Arbitration	Intellectual Property	\$1000	American Safety Razor Company	2010
Francis, Michael	Weil Gotshal	Mergers and Acquisitions			\$1000	Lehman Brothers Holding Inc	2010
Keller, Andy	Simpson Thacher	Corporate	Energy		\$1000	Lehman Brothers Holding Inc	2010
Nave, Douglas	Weil Gotshal	Arbitration	Finance	Mergers and Acquisition	\$1000	Motors Liquidation Company	2010
Norwood, Andrew R.	Weil Gotshal	Finance			\$1000	Lehman Brothers Holding Inc	2010
Ostrager, Barry R.	Simpson Thacher	Litigation			\$1000	Washington Mutual	2010
Harepool, Anthony	Weil Gotshal	Bankruptcy			\$1000	Lehman Brothers Holding Inc	2010
Kelly, Jacky	Weil Gotshal	Bankruptcy	Finance		\$1000	Lehman Brothers Holding Inc	2010
Nicklin, Michael	Weil Gotshal	Bankruptcy	Finance	Equities	\$1000	Lehman Brothers Holding Inc	2010
Shankland, Matthew	Weil Gotshal	Alternative Dispute Resolution			\$1000	Lehman Brothers Holding Inc	2010
Martin, Stefan	Allen & Overy LLP	Labor and Employment			\$1,152	BearingPoint	2009

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Huber, John J.	Latham Watkins	Capital Markets			\$1,120	Aviza Technology	2009
Reynolds, Michael	Allen & Overy LLP	Mergers and Acquisitions			\$1,111	Chemtura Corp.	2009
Norley, Lyndon E.	Kirkland & Ellis LLP	Bankruptcy			\$1,110	Chemtura Corp.	2009
Norley, Lyndon E.	Kirkland & Ellis LLP	Bankruptcy			\$1,100	Reader's Digest Association Inc	2009
Reiss, John M.	White & Case	Mergers and Acquisitions	Equities		\$1,100	Heartland Automotive Holdings	2009
Giuseppe, Stephen	Kirkland & Ellis LLP	Corporate			\$1,080	Chemtura Corp.	2009
Nakata, Nobuo	Allen & Overy LLP	Corporate			\$1,077	BearingPoint	2009
Brown, Stephen	Latham Watkins	Employee Benefits			\$1,065	Aviza Technology	2009
Chanda, Kenneth D. C.	Latham Watkins	Mergers and Acquisitions			\$1,065	Aviza Technology	2009
Pinn, Sean	Latham Watkins	Tax			\$1,065	Aviza Technology	2009
Sifran, Lawrence	Latham Watkins	Finance			\$1,065	Aviza Technology	2009
Verbung, Leonard	Allen & Overy LLP	Labor and Employment			\$1,065	BearingPoint	2009
Lee-Lim, Jiyeon	Latham Watkins	International Law	Tax		\$1,065	Spanion	2009
Pisillo, Bernie	Shearman & Sterling LLP	Tax			\$1,065	Workspace	2009
Selder, Mitchell A.	Latham Watkins	Bankruptcy			\$1,065	Spanion	2009
Stokermans, Christiaan	Allen & Overy LLP	Corporate			\$1,062	BearingPoint	2009
Pohl, Timothy	Skadden	Bankruptcy	Litigation		\$1,050	Verason Energy Corporation	2009
Leung, Thomas	White & Case	Bankruptcy			\$1,050	Global Safety Textiles	2009
Mulaney, Charles W.	Skadden	Mergers and Acquisitions			\$1,050	Hartmarx	2009
Rosan, Matthew A.	Skadden	Tax			\$1,050	Hartmarx	2009
Zrinsky, Bruce	Cadwalader	Bankruptcy			\$1,050	TH Agriculture	2009

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Source: Valed partners, Washington, D.C. Notes: Based on recent filings in a range of bankruptcy cases. Some lawyers may have standard hourly rates above what they charged in these cases.

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Milmo, J. Gregory	Skadden	Bankruptcy			\$1,050	Interstate Bakeries	2009
Braut, Elean	Allen & Overy LLP	Antitrust			\$1,038	Chemura Corp.	2009
Stroff, Neal	Skadden	Antitrust			\$1,035	Varasun Energy Corporation	2009
Hayman, Linda C.	Skadden	Corporate	Mergers and Acquisitions		\$1,035	Interstate Bakeries	2009
Neelke, Peter J.	Skadden	Finance			\$1,032	Interstate Bakeries	2009
MacLaughlin, James	Baker McKelvey	Tax			\$1,029	Microm	2009
Keck, Colleen	Allen & Overy LLP	Corporate	Intellectual Property		\$1,028	BearingPoint	2009
Kelther, Eileen	Allen & Overy LLP	Mergers and Acquisitions			\$1,028	BearingPoint	2009
Fujita, Francisc	Vinson & Elkins	Capital Markets	Energy	International Law	\$1,028	MPF Holding US LLC and Official Committee Of Unsecured Creditors	2009
Reyman, David	Skadden	Tax			\$1,026	Mark IV Industries	2009
Davenport II, Kirk	Latham Watkins	Capital Markets			\$1,025	Dayton Superior	2009
Clayton, Lewis	Paul Weiss	Intellectual Property			\$1,025	Tronox	2009
Fisch, Peter	Paul Weiss	Real Estate			\$1,025	Tronox	2009
Kornberg, Alan	Paul Weiss	Bankruptcy			\$1,025	Tronox	2009
Schimek, Terry	Paul Weiss	Finance			\$1,025	Tronox	2009
Smith, Mark	Skadden	Corporate			\$1,013	Mark IV Industries	2009
Hyde, Mark	Clifford Chance	Bankruptcy			\$1,000	Lyondell Chemical Company	2009
Butlers, James	Clifford Chance	Mergers and Acquisitions			\$1,000	Lyondell Chemical Company	2009
Safirstein, Jeffrey	Paul Weiss	Bankruptcy			\$1,000	Samsonite Company	2009
Meyerson, Lee	Simpson Thacher	Capital Markets	Mergers and Acquisitions		\$1,000	Washington Mutual	2009
Finley, John	Simpson Thacher	Mergers and Acquisitions			\$1,000	Lehman Brothers Holding Inc	2009
Gover, Alan	White & Case	Bankruptcy			\$1,000	Hospital Partners	2009

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Source: Vero's partners, Washington, D.C. Notes: Based on recent filings in a range of bankruptcy cases. Some lawyers may have standard hourly rates above what they charge in these cases.

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Name	Title	Practice Area	Firm	City	State	Country	Graduated Law School
Adelson, Elliot A.	Partner	Litigation	Kirkland and Ellis	San Francisco	CA	United States	
Agronoff, Aaron L.	Associate		Jones Day	San Francisco	CA	United States	
Alford, Hans J.	Associate		Kirkland and Ellis	San Francisco	CA	United States	
Baker, James P.	Partner	Employee Benefits and Exec Comp	Jones Day	San Francisco	CA	United States	430 260
Bass, Eric	Associate		Farella Braun and Marmel	San Francisco	CA	United States	730
Benavente, Peter J.	Partner	Business Restructuring and Reorganization	Jones Day	San Francisco	CA	United States	400
Berning, Scott M.	Associate	Business and Finance	Morgan Lewis and Boekus	San Francisco	CA	United States	745
Berman, David M.	Partner	Commercial Litigation, Bankruptcy and Restruc.	Pacholski, Slung, Zehl and Jones	San Francisco	CA	United States	345 595
Boroch, Martha	Partner	Corporate/Criminal Investigations	Jones Day	San Francisco	CA	United States	725
Borstein, Jeffrey	Partner	White Collar Crime, Commercial Litigation	K and L Gates	San Francisco	CA	United States	525 590
Brown, Donald W.	Partner	Business and Finance	Convington and Burking	San Francisco	CA	United States	640
Browning, J. Taylor	Associate	Tort and Environmental Litigation	Morgan Lewis and Boekus	San Francisco	CA	United States	1995 1994
Bunzlauer, Brenda M.	Partner	Environmental	King and Spalding	San Francisco	CA	United States	
Castro, Ruth Ann	Associate	Corporate Finance and Mergers	Farella Braun and Marmel	San Francisco	CA	United States	380
Christensen, C. Murphy	Partner	Healthcare	QMcHenry and Myers	San Francisco	CA	United States	675
Christman, Ryan M.	Associate	Business Restructuring and Reorganization	Kirkland and Ellis	San Francisco	CA	United States	315
Conroy, Michelle	Associate	Business Restructuring and Reorganization	Jones Day	San Francisco	CA	United States	2001
Cooley, Peter J.	Equesat	Business Restructuring and Reorganization	Jones Day	San Francisco	CA	United States	1984
Davies, Doug	Partner	Employment	Farella Braun and Marmel	San Francisco	CA	United States	510 510
Dibble, Sam	Partner	Business Transactions	Farella Braun and Marmel	San Francisco	CA	United States	282 282
Dixon, Benjamin	Partner	Complex Commercial Securities Litigation	Holler, Emswiler	San Francisco	CA	United States	573 573
Ernst, Megan	Associate	Trial	Jones Day	San Francisco	CA	United States	2007
Dobryzowski, Daniel T.	Partner	Construction	Farella Braun and Marmel	San Francisco	CA	United States	525
Douglas, Scott	Partner		DLA Piper	San Francisco	CA	United States	425
Dunn, Heather	Associate			San Francisco	CA	United States	

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Espin, Charlotte C.	Associate	Trial	Jones Day	San Francisco	CA	United States	2006	2008	665	775	325	
Eisenbach, Robert L.	Partner	Bankruptcy and Restructuring	Cookley Godward Konish Morrison and Fowler	San Francisco	CA	United States	2006	2008	665	775	325	
Engel, G. Lairy	Partner	Bankruptcy and Restructuring	Cookley Godward Konish Morrison and Fowler	San Francisco	CA	United States	2006	2008	665	775	325	
Esperanza, Chysty	Associate	Labor and Employment	Farella Braun and Martel	San Francisco	CA	United States	1975	1975	330		535	
Ford, Robert	Partner	Bankruptcy and Restructuring	DLA Piper	San Francisco	CA	United States	1975	1975	540		515	
Frank, Michael T.	Partner	Bankruptcy and Restructuring	DLA Piper	San Francisco	CA	United States	1975	1975	540		515	
Freid, Joshua M.	Partner	Bankruptcy and Restructuring	DLA Piper	San Francisco	CA	United States	1975	1975	540		515	
Franchick, John E.	Partner	Bankruptcy and Restructuring	DLA Piper	San Francisco	CA	United States	1975	1975	540		515	
Garnett, Benjamin P.	Associate	Bankruptcy and Restructuring	DLA Piper	San Francisco	CA	United States	1975	1975	540		515	
Gerling, Tyler	Associate	Bankruptcy and Restructuring	DLA Piper	San Francisco	CA	United States	1975	1975	540		515	
Gloster, Dean	Partner	Bankruptcy and Creditors Rights	Farella Braun and Martel	San Francisco	CA	United States	2006	2006	355	355	375	
Grother, Neil	Partner	Bankruptcy and Creditors Rights	Farella Braun and Martel	San Francisco	CA	United States	2006	2006	355	355	375	
Grone, John	Partner	Insurance Coverage	Farella Braun and Martel	San Francisco	CA	United States	2006	2006	355	355	375	
Hall, Dan	Partner	Bankruptcy and Creditors Rights	Farella Braun and Martel	San Francisco	CA	United States	2006	2006	355	355	375	
Hall, Daniel	Associate	Bankruptcy and Creditors Rights	Farella Braun and Martel	San Francisco	CA	United States	2006	2006	355	355	375	
Hodkin, Frederick D.	Partner	Bankruptcy and Creditors Rights	Farella Braun and Martel	San Francisco	CA	United States	2006	2006	355	355	375	
Huntley, Lynn M.	Of Counsel	Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Jin, Nancy	Associate	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Joslin, Nan	Partner	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Karabin, Scott D.	Partner	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Krause, Christopher W.	Associate	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Kulik, Tobias S.	Partner	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Kim, Nancy	Associate	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Konover, Curt	Partner	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	
Kordstein, Sam	Partner	Business Litigation	Drick, Hemington and Sutcliffe	San Francisco	CA	United States	2006	2006	355	355	375	

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Name	Title	Practice Area	Firm	City	State	Country	Graduated Law School
Lauksh, Justin	Counsel	Corporate Finance	OMelveny and Myers	San Francisco	CA	United States	1997
Marshall, Robert G.	Partner	Employee Benefits and ERISA	Jones Day	San Francisco	CA	United States	1997
Mason, Dory	Associate Partner	Restructuring and Insolvency	Fawcett Braun and Martel Weston and Shaw	San Francisco	CA	United States	1997
McDonald, Brian D.	Associate Partner	Trial Practice	Jones Day	San Francisco	CA	United States	2002
McKinn, Mark E.	Partner	Business and Finance	Kirkland and Ellis	San Francisco	CA	United States	1893
Myers, William A.	Partner	Insurance Liability and Recovery	Morgan Lewis and Boekus Jones Day	San Francisco	CA	United States	1887
Myers, Martin H.	Partner	Recovery	Jones Day	San Francisco	CA	United States	1893
Nages, Adhi	Associate	Banking and Finance	Fawcett Braun and Martel	San Francisco	CA	United States	2002
Nakai, Casey M.	Associate	Banking and Finance	Kirkland and Ellis	San Francisco	CA	United States	1979
Olson, James C.	Partner	Banking and Finance	Jones Day	San Francisco	CA	United States	1979
Oso, Amanda M.	Associate	Banking and Finance	Jones Day	San Francisco	CA	United States	1979
Osgood, Michael C.E.	Associate	Banking and Finance	Kirkland and Ellis	San Francisco	CA	United States	1979
Palmer, Katie	Associate	Banking and Finance	Kirkland and Ellis	San Francisco	CA	United States	1979
Parsons, Karen H.	Associate Of Counsel	Banking and Finance	Morgan Lewis and Boekus	San Francisco	CA	United States	1979
Potbeck, Thomas R.	Partner	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Potter, Alex	Associate	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Rapagosa, Ramiro	Associate	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Rachy, Katherine S.	Partner	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Ritter, Peter	Partner	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Roche, Laura	Associate	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Rodriguez, Noel	Associate	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Sabnis, Cheryl	Counsel	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Schickert, Vladimir	Partner	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979
Selling, Jocelyn	Of Counsel	California Employment	McGowan Lewis and Myers	San Francisco	CA	United States	1979

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Shepard, Michael	Associate	Securities Litigation	Heber Eisen	San Francisco	CA	United States	2008	2008	750			760	
Shin, Susan	Associate	Labor and Employment	Heber Eisen	San Francisco	CA	United States	2008	2008	260			325	390
Sponner, Leah	Associate	Commercial Litigation	K and L Gates	San Francisco	CA	United States	2003	2003	430			410	395
Stoyars, Eric	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Stewart, Rhonda L.	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Thaler, Alexandra (Sister)	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Thompson, Brent	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Topnik, Christie D.	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Trepert, Hollen	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Trodels, Robert A.	Partner	Business Transactions	King Spink	San Francisco	CA	United States							
Ulland, Suzanne	Partner	Business Transactions	King Spink	San Francisco	CA	United States							
Vogt, Gary W.	Senior Legal Assistant	Business Transactions	King Spink	San Francisco	CA	United States							
Wagner, Kristine	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Wall, Gregory A.	Senior Attorney	Business Transactions	King Spink	San Francisco	CA	United States							
Wessels, Kelly	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Whalen, Joe	Partner	Business Transactions	King Spink	San Francisco	CA	United States							
Wink, Jack L.	Associate	Business Transactions	King Spink	San Francisco	CA	United States							
Wilson, Nicholas	Counsel	Business Transactions	King Spink	San Francisco	CA	United States							
Woodruff, Kelly	Partner	Business Transactions	King Spink	San Francisco	CA	United States							
Zwibelman, Michael	Partner	Business Transactions	King Spink	San Francisco	CA	United States							

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**Westlaw CourtExpress**

**LEGAL BILLING REPORT**

VOLUME 11, NUMBER 1

May 2009

**BY BILLING RATE**

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
P Kelly, Jr., Daniel	Davis Polk & Wardwell (CA)	1986	1986	CA	\$ 900.00	4.50	4,320.00
P Condes, Julia	Davis Polk & Wardwell (CA)	1990	1990	CA	955.00	17.00	16,235.00
P Osherman, Scott	Osherman & Myers LLP (CA)	1975	1875	CA	860.00	1.10	946.00
P Tuchin, Michael	Klee, Tuchin, Bogdanoff & Stern, LLP	1990	1990	CA	850.00	0.50	425.00
P Balbach, Karen	Weil, Gotschal & Mangos LLP (CA)	1986	1986	CA	799.00	0.80	639.20
P Arnold, Dennis	Gibson Dunn & Crutcher, LLP (CA)	1975	1978	CA	750.00	4.50	3,555.00
OC Morris, Michael	Herrigan Bennett & Dorman LLP	1979	1979	CA	750.00	65.20	45,652.00
P Avulich, Craig	White & Case LLP (CA)	1984	1984	CA	750.00	128.10	96,075.00
P Kharasch, Ira D.	Pachulski Stang Zieml Young Jones & Weintraub (CA)	1982	1982	CA	725.00	2.90	2,175.00
P Kornfeld, Alan	Pachulski Stang Zieml Young Jones & Weintraub (CA)	1987	1987	CA	725.00	0.80	580.00
A Lamb, Peter	Davis Polk & Wardwell (CA)	2005	2005	CA	680.00	101.40	69,952.00
P Irving, Jeanne E.	Herrigan Bennett & Dorman LLP	1976	1978	CA	680.00	18.10	6,868.00
P Kevane, Henry	Pachulski Stang Zieml Young Jones & Weintraub (CA)	1985	1986	CA	675.00	19.10	12,892.50
A Goslich, Ronald	White & Case LLP (CA)	2001	2001	CA	665.00	176.20	117,174.00
P Brown, Kenneth H.	Pachulski Stang Zieml Young Jones & Weintraub (CA)	1977	1981	CA	650.00	27.30	47,745.00
P Fidler, David	Klee, Tuchin, Bogdanoff & Stern, LLP	1997	1998	CA	650.00	23.10	15,015.00
P Weiskamm, Henry	Munger Tolles & Olson LLC	1987	1987	CA	650.00	0.50	328.00
P Bernthal, David M.	Pachulski Stang Zieml Young Jones & Weintraub (CA)	1989	1993	CA	645.00	35.50	22,952.00
P Montgomery, Cromwell	Gibson Dunn & Crutcher, LLP (CA)	1997	1997	CA	635.00	0.80	508.00
P Brown, Dennis	Munger Tolles & Olson LLC	1970	1970	CA	625.00	17.80	11,125.00
A Newman, Samuel	Gibson Dunn & Crutcher, LLP (CA)	2001	2001	CA	610.00	13.50	8,235.00
A DeGrath, Shiva	White & Case LLP (CA)	2003	2003	CA	600.00	183.70	110,220.00
P Vincent, Garth	Munger Tolles & Olson LLC	1988	1988	CA	600.00	124.90	74,780.00
A Scott, Malinda	White & Case LLP (CA)	2004	2004	CA	600.00	20.90	12,540.00
P Buchanan, Laura	Klee, Tuchin, Bogdanoff & Stern, LLP	1991	1991	CA	590.00	0.20	118.00
A Ger Kwang-chien, B	Weil, Gotschal & Mangos LLP (CA)	2003	2003	CA	570.00	28.50	16,530.00
A Erdal, David	Gibson Dunn & Crutcher, LLP (CA)	2003	2003	CA	570.00	2.50	1,653.00
P Heintz, Jeffrey	Munger Tolles & Olson LLC	1884	1984	CA	550.00	35.10	19,305.00
P Fried, Joshua	Pachulski Stang Zieml Young Jones & Weintraub (CA)	1995	1995	CA	535.00	21.40	11,449.00
P Rutten, James	Munger Tolles & Olson LLC	1997	1997	CA	525.00	25.80	13,545.00
A Morse, Joshua	Herrigan Bennett & Dorman LLP	2000	2000	CA	505.00	13.10	6,615.50
A Malachuk, Michael	Weil, Gotschal & Mangos LLP (CA)	2005	2005	CA	500.00	36.50	18,250.00
A Barsho, Melissa	Gibson Dunn & Crutcher, LLP (CA)	2006	2006	CA	470.00	14.00	6,580.00
A Liu, Leslie	Weil, Gotschal & Mangos LLP (CA)	2006	2006	CA	465.00	45.90	21,343.50
A Kauffman, Derek	Munger Tolles & Olson LLC	2005	2005	CA	450.00	508.30	228,733.00
A Hochleuber, Brian	Munger Tolles & Olson LLC	2002	2002	CA	435.00	0.30	130.50
A Nathan, Joseph	Weil, Gotschal & Mangos LLP (CA)	2007	2007	CA	415.00	25.20	10,458.00
A Jassper, M. Lance	Munger Tolles & Olson LLC	2006	2006	CA	400.00	96.20	38,480.00
A Estandart, Barney	Munger Tolles & Olson LLC	2006	2006	CA	400.00	8.80	3,520.00
A Rubin, Francis E.	O'Mahony & Myers LLP (CA)	2006	2006	CA	395.00	8.40	3,318.00

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
A. Schneider, Bradley	Munger, Tolles & Olson LLC	2004	2004	CA	\$ 385.00	1.30	513.50
A. Reaven, Matthew	Wells, Goltsbel & Marges LLP (CA)	2008	2008	CA	355.80	13.50	4,792.50
A. Guzman, Tanya	O'Melvaney & Myers LLP (CA)	2007	2007	CA	330.00	2.30	828.00
PP Neglia, Ross	O'Melvaney & Myers LLP (CA)				260.00	6.20	1,612.00
Finatison, Katha	Pachulski Slang Zieni Young Jones & Weintraub (CA)				225.00	27.50	6,210.00
Jeffries, Patricia J.	Pachulski Slang Zieni Young Jones & Weintraub (CA)				225.00	0.40	90.00
PP Fearson, Sandra	Klein, Tucka, Boddanoff & Stern, LLP			CA	215.00	1.90	408.50
PP Floyd, Kevin	Hennigan Bennett & Dorman LLP				210.00	0.30	63.00
PP Krojts, Cheryl	Pachulski Slang Zieni Young Jones & Weintraub (CA)				205.00	2.20	451.00
CMA Pittman, Sherrie	Pachulski Slang Zieni Young Jones & Weintraub (CA)				125.00	2.50	325.00

**Westlaw CourtExpress**

**LEGAL BILLING REPORT**

VOLUME 11, NUMBER 2

August 2009

**BY BILLING RATE**

California rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
P Tolles, Stephen L.	Gibson Dunn & Crutcher, LLP (CA)	1982	1982	CA	\$ 860.00	0.10	\$ 86.00
P Patterson, Thomas	Klea Tuchin, Boddanoff & Stern, LLP	1994	1994	CA	830.00	223.00	191,250.00
P Tuchin, Michael	Klea Tuchin, Boddanoff & Stern, LLP	1990	1990	CA	850.00	74.40	63,240.00
P Stern, David	Klea Tuchin, Boddanoff & Stern, LLP	1975	1975	CA	850.00	32.80	27,960.00
P Issler, Paul S.	Gibson Dunn & Crutcher, LLP (CA)	1986	1986	CA	840.00	6.35	5,334.00
P Arnold, Dennis	Gibson Dunn & Crutcher, LLP (CA)	1975	1976	CA	844.00	4.10	3,444.00
P Thompson, Brian	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1991	1991	CA	820.00	72.80	59,696.00
P Balcer, Karen	Well, Gotshall & Mangos, LLP (CA)	1986	1986	CA	810.00	40.40	32,724.00
P Zisli, Dean A.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1978	1978	CA	795.00	20.30	16,138.50
P Gilmer, Danielle	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1993	1994	CA	775.00	9.50	7,362.50
P Averch, Craig	White & Case LLP (CA)	1984	1984	CA	750.00	189.20	141,900.00
P Keller, Tobias	White & Case LLP (CA)	1984	1980	CA	750.00	1.90	1,425.00
P Baker, James	White & Case LLP (CA)	1980	1980	CA	750.00	0.20	150.00
P Winston, Eric D.	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1999	1999	CA	740.00	7.10	5,254.00
P Orr, Johanna Y.	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1997	1997	CA	740.00	6.30	4,662.00
P Kornfeld, Alan	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1987	1987	CA	725.00	10.10	7,322.50
P Blort, Jeffrey E.	Sidley Austin Brown & Wood LLP (CA)	1997	1998	CA	700.00	110.90	77,630.00
P Myers, Martin	White & Case LLP (CA)	1987	1987	CA	700.00	28.50	19,950.00
P Grassowen, Debra L.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1991	1992	CA	695.00	5.50	3,822.50
P Gustafson, Mark E.	White & Case LLP (CA)	1998	1998	CA	685.00	117.70	80,824.50
P Alash, Dora	Gibson Dunn & Crutcher, LLP (CA)	1995	1995	CA	675.00	39.40	26,595.00
A Gorsich, Ronald	White & Case LLP (CA)	2001	2001	CA	665.00	271.50	147,297.50
P Montgomery, Cromwell	Gibson Dunn & Crutcher, LLP (CA)	1997	1997	CA	635.00	2.50	1,587.50
A Newman, Samuel	Gibson Dunn & Crutcher, LLP (CA)	2001	2001	CA	610.00	11.50	7,015.00
A Derahim, Shiva	White & Case LLP (CA)	2003	2003	CA	600.00	217.50	130,500.00
A Scott, Melanie	White & Case LLP (CA)	2004	2004	CA	800.00	74.90	44,940.00
P Trudell, Robert	White & Case LLP (CA)	1995	1995	CA	600.00	35.30	21,180.00
A Ger Kwang-chlon, B.	Well, Gotshall & Mangos, LLP (CA)	2003	2003	CA	580.00	54.20	31,436.00
OC Matcail, Brian	Klea, Tuchin, Boddanoff & Stern, LLP	1998	1999	CA	575.00	12.40	7,130.00
A Egoff, David	Gibson Dunn & Crutcher, LLP (CA)	2003	2003	CA	570.00	0.50	285.00
C Crosby IV, Peter	White & Case LLP (CA)	1984	1984	CA	565.00	13.30	7,514.50
A Martin, Jill	White & Case LLP (CA)	2006	2006	CA	550.00	45.80	25,180.00
A Conza, Michelle	White & Case LLP (CA)	2001	2001	CA	525.00	1.70	892.50
OC Brandt, Gina F.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)	1976	1976	CA	525.00	1.30	682.50
A Malefic, Michael	Well, Gotshall & Mangos, LLP (CA)	2005	2005	CA	500.00	175.30	87,650.00
A Rodriguez, Noel	White & Case LLP (CA)	2003	2003	CA	500.00	41.80	20,900.00
A Heyn, Matthew	Klea, Tuchin, Boddanoff & Stern, LLP	2003	2003	CA	495.00	111.80	55,341.00
A Barstow, Melissa	Gibson Dunn & Crutcher, LLP (CA)	2006	2006	CA	470.00	4.10	1,927.00
A Liu, Leslie	Well, Gotshall & Mangos, LLP (CA)	2008	2008	CA	465.00	302.70	140,755.50
A Chun, Sebyul	White & Case LLP (CA)	2008	2008	CA	460.00	162.10	74,565.00

California rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
					\$		\$
A Morrison, Kelley M	White & Case LLP (CA)	2008	2008	CA	460.00	105.50	48,530.00
A Hawk, Jonathan	White & Case LLP (CA)	2007	2007	CA	460.00	20.30	9,338.00
P Phillip, Laurence	Mckenna Long & Aldridge LLP (CA)	1997	1997	CA	450.00	15.00	6,750.00
P Larsen, J David	Mckenna Long & Aldridge LLP (CA)	1997	1997	CA	450.00	10.00	4,500.00
A Guest, David	Klein, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	430.00	366.70	157,881.00
A Pczmanier, Courtney	Klein, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	430.00	23.29	9,976.00
A Dickerson, Matthew	Sidley Austin Brown & Wood LLP (CA)	2007	2007	CA	425.00	25.30	10,752.50
A Tran, William	Sidley Austin Brown & Wood LLP (CA)	2006	2006	CA	425.00	5.40	2,295.00
A Nathan, Joseph	Weil, Gotshal & Manges LLP (CA)	2007	2007	CA	415.00	61.50	25,522.50
A Whitson, Lorna S.	Gibson Dunn & Crutcher, LLP (CA)	2008	2008	CA	400.00	4.00	1,600.00
A Dearlhan, Kevin	Sidley Austin Brown & Wood LLP (CA)	2008	2008	CA	375.00	49.30	18,487.50
A Simonds, Ariella	Klein, Tuchin, Bogdanoff & Stern, LLP	2008	2008	CA	300.00	4.70	1,410.00
A Elliot, Kerin	Klein, Tuchin, Bogdanoff & Stern, LLP	2008	2008	CA	300.00	2.10	630.00
LIB Forrester, Leslie A.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)				250.00	4.30	1,225.00
PP Haris, Denise A.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)				225.00	8.50	1,912.50
PP Graceland, Michelle	Mckenna Long & Aldridge LLP (CA)				215.00	40.60	8,729.00
PP Pearson, Sandra	Klein, Tuchin, Bogdanoff & Stern, LLP			CA	215.00	36.00	7,740.00
PP Brown, Thomas J.	Pachulski Stang Ziehl Young Jones & Weintraub (CA)				195.00	2.00	390.00
LIB James, Carla H.	Gibson Dunn & Crutcher, LLP (CA)				165.00	0.50	82.50

**Westlaw CourtExpress**

**LEGAL BILLING REPORT**

VOLUME 11, NUMBER 3

December 2009

**BY BILLING RATE**

California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
P Pachulski, Richard M.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1978	1979	CA	\$ 885.00	287.62	\$ 257,419.90
P Patterson, Thomas	Klee, Tuchin, Bogdanoff & Stern, LLP	1994	1994	CA	850.00	382.60	333,710.00
P Teshin, Nicholas	Klee, Tuchin, Bogdanoff & Stern, LLP	1990	1990	CA	850.00	201.40	171,190.00
P Stiem, David	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1975	CA	850.00	84.80	58,480.00
P Pachulski, Richard M.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1979	1979	CA	850.00	68.00	57,800.00
P Arnold, Dennis	Gibson Dunn & Crutcher, LLP (CA)	1975	1975	CA	840.00	1.00	840.00
P Ziehl, Dean A.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	825.00	258.75	211,405.25
P Timmons, Brian	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1991	1991	CA	820.00	240.60	197,282.00
P Lyons, Dennis	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1886	1988	CA	820.00	80.20	65,764.00
P Orgel, Robert B.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1981	1981	CA	795.00	357.30	284,053.50
P Richards, Jeremy	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1980	1981	CA	795.00	158.50	126,007.50
P Zehn, Dean A.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	795.00	94.00	74,730.00
P Zehn, Dean A.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1978	1978	CA	785.00	20.30	16,136.50
P Winston, Eric D.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1999	1999	CA	740.00	54.00	39,980.00
P Ong, Johanna Y.	Quinn Emanuel Urquhart Oliver & Hedges, LLP	1997	1997	CA	740.00	11.20	8,288.00
P Kornfeld, Alan	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	725.00	10.10	7,322.50
P Grassmann, Debra L.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1991	1992	CA	695.00	6.50	3,822.50
P Galina, Andrew	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1983	1983	CA	685.00	3.40	2,363.00
P Parker, Daryl	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1988	1970	CA	675.00	60.80	41,040.00
P Mahoney, James	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1988	1987	CA	675.00	16.60	11,205.00
P Arash, Dora	Gibson Dunn & Crutcher, LLP (CA)	1995	1995	CA	675.00	14.80	9,990.00
P Davids, Roman	Klee, Tuchin, Bogdanoff & Stern, LLP	1985	1985	CA	650.00	1.40	910.00
A Newman, Samuel	Gibson Dunn & Crutcher, LLP (CA)	2001	2001	CA	610.00	3.70	2,287.00
C Hochman, Harry	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	585.00	100.80	59,976.00
A Newmark, Victoria	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1986	1997	CA	595.00	32.50	18,337.50
C Cho, Shady	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1997	1997	CA	595.00	19.40	11,503.00
C Hochman, Harry	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1987	1987	CA	575.00	57.60	33,120.00
A Dirckman, Jennifer	Klee, Tuchin, Bogdanoff & Stern, LLP	1989	1989	CA	575.00	1.40	802.50
OC Matcalf, Brian	Klee, Tuchin, Bogdanoff & Stern, LLP	1999	1999	CA	575.00	0.70	402.50
A Heyn, Wayne	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1976	1976	CA	525.00	1.30	682.50
P Brown, Glenn	Klee, Tuchin, Bogdanoff & Stern, LLP	2003	2003	CA	495.00	109.70	54,301.50
A Barstow, Melissa	Pachulski Stang Zehn Young Jones & Weintraub (CA)	1989	1989	CA	495.00	0.50	247.50
A Liu, Leslie	Gibson Dunn & Crutcher, LLP (CA)	2006	2006	CA	485.00	9.80	4,557.00
P Phelan, Laurence	Wall, Gotsdiner & Maloney, LLP (CA)	1997	1997	CA	450.00	2.70	1,215.00
A Guass, David	Mckenna Long & Ashrade, LLP (CA)	2005	2005	CA	430.00	402.90	173,247.00
PP Santos, Joseph C	Quinn Emanuel Urquhart Oliver & Hedges, LLP	2008	2008	CA	380.00	4.80	1,748.00
A Elliot, Koim	Klee, Tuchin, Bogdanoff & Stern, LLP	2008	2008	CA	300.00	16.60	4,980.00
PP Lacroix, Maurice	Quinn Emanuel Urquhart Oliver & Hedges, LLP	2008	2008	CA	250.00	20.30	5,075.00
LIB Fornestri, Leslie A.	Pachulski Stang Zehn Young Jones & Weintraub (CA)	2008	2008	CA	250.00	4.90	1,225.00



California Rate Report

PROFESSIONAL	FIRM	GRADUATED	ADMITTED	STATE	RATE	HOURS	TOTAL
LIg Farnesier, Leslie A.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				\$ 250.00	1.80	450.00
PP Harris, Denise A.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				225.00	47.80	10,777.50
PP Harris, Denise A.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				225.00	8.50	1,912.50
PP Hamblen, Felice	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				225.00	0.40	90.00
PP Gyncerfer, Michelle	Mckenna Long & Aldridge LLP (CA)				215.00	60.40	12,986.00
PP Brown, Thomas J.	Klaes, Tuchin, Bogdanoff & Stern, LLP				215.00	57.40	11,268.00
PP Matoso, Mike	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				195.00	59.75	11,651.25
PP Brown, Thomas J.	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				195.00	6.00	1,170.00
US Euenheart, Christine	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				180.00	3.00	540.00
PP Sahn, Andrew	Mckenna Long & Aldridge LLP (CA)				180.00	16.80	2,535.00
PP Bass, John	Pachniski Slang Ziehl Young Jones & Weintraub (CA)				150.00	0.80	120.00





**2010 NLJ Billing Survey**

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Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Adams and Reese	New Orleans	\$265	\$550	\$250	\$344	\$290	\$195	\$229
2010	Akerman Senterfitt	Miami							
2010	Akin Gump Strauss Hauer & Field	Washington							
2010	Allen Matkins Lack	Los Angeles							
2010	Gamble Malloy & Natisis	Atlanta	\$515	\$865	\$450	\$627	\$590	\$270	\$405
2010	Alston & Bird	Houston							
2010	Andrews Kurth	Haddonfield, NJ		\$560	\$305		\$340	\$175	
2010	Arent Fox	Washington							
2010	Armstrong Teasdale	St. Louis		\$765	\$400		\$475	\$240	
2010	Arnold & Porter	Washington		\$475	\$300		\$325	\$200	
2010	Baker & Daniels	Indianapolis							
2010	Baker & Hostetler	Cleveland							
2010	Baker Botts L.L.P.	Houston							
2010	Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, TN	\$312	\$595	\$255	\$357	\$320	\$165	\$231
2010	Ballard Spahr	Philadelphia							
2010	Barnes & Thornburg	Indianapolis	\$367	\$613	\$298	\$416	\$355	\$225	\$261
2010	Bass, Berry & Sims	Nashville, TN							
2010	Benesch, Friedlander, Coplan & Aronoff	Cleveland	\$315	\$575	\$350	\$335	\$360	\$195	\$245
2010	Best Best & Krieger	Riverside, Calif.		\$550	\$310		\$395	\$225	



Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Dewey & Leboeuf LLP	New York							
2010	Dickinson Wright	Detroit		\$575	\$355		\$275	\$195	
2010	Dickstein Shapiro	Washington	\$546	\$950	\$525	\$656	\$530	\$265	\$426
2010	Dinsmore & Shohl	Cincinnati	\$302	\$590	\$220	\$360	\$300	\$175	\$222
2010	DLA Piper	Chicago							
2010	Dorsey & Whitney	Minneapolis	\$410	\$795	\$290	\$515	\$440	\$180	\$285
2010	Duane Morris	Philadelphia	\$483	\$850	\$240	\$560	\$480	\$135	\$349
2010	Dykema Gossett	Detroit	\$445	\$635	\$360	\$495	\$450	\$225	\$325
2010	Eckert Seamans Chertin & Melloff	Pittsburgh		\$625	\$250		\$320	\$150	
2010	Edwards Angell Palmer & Dodge	Boston	\$451	\$780	\$345	\$571	\$610	\$200	\$323
2010	Epstein Becker & Green	New York	\$429	\$850	\$350	\$620	\$450	\$180	\$325
2010	Faegre & Benson LLP	Minneapolis							
2010	Finnegan, Henderson, Farabow, Garrett & Dünner	Washington							
2010	Fish & Richardson	Boston							
2010	Fisher & Phillips	Atlanta		\$505	\$340		\$360	\$220	
2010	Fitzpatrick, Calla, Harper & Scinto	New York		\$730	\$460		\$440	\$275	
2010	Foley & Lardner	Milwaukee	\$554	\$1,035		\$654		\$255	\$426
2010	Foley Hoag	Boston							
2010	Ford & Harrison	Atlanta		\$620	\$375		\$390	\$250	
2010	Fowler White Boggs	Tampa, FL	\$350	\$675	\$325	\$400	\$315	\$205	\$250
2010	Fox Rothschild	Philadelphia	\$407	\$690	\$315	\$473	\$475	\$235	\$298
2010	Frost Brown Todd	Cincinnati	\$279	\$515	\$200	\$326	\$250	\$150	\$189
2010	Fulbright & Jaworski	Houston							
2010	Gardere Wynne Sewell	Dallas	\$445	\$815	\$380	\$531	\$445	\$195	\$311
2010	Gibbons	Newark, NJ	\$404	\$790	\$390	\$479	\$450	\$250	\$289
2010	Gibson, Dunn & Crutcher LLP	Los Angeles							
2010	Godfrey & Kahn	Milwaukee		\$495	\$325		\$340	\$180	
2010	Goodwin Procter	Boston							

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Gordon & Rees	San Francisco, CA							
2010	GrayRobinson	Orlando, FL		\$750	\$225		\$315	\$150	
2010	Greenberg Traurig	New York	\$453	\$875	\$355	\$550	\$610	\$200	\$332
2010	Harris Beach	Rochester, NY		\$500	\$275		\$250	\$140	
2010	Haynes and Boone	Dallas							
2010	Hinshaw & Culbertson	Chicago							
2010	Hiscock & Barclay	Syracuse, NY	\$311	\$650	\$195	\$348	\$440	\$150	\$234
2010	Hodgson Russ	Buffalo, NY	\$328	\$665	\$230	\$374	\$410	\$175	\$238
2010	Hogan Lovells	Washington							
2010	Holland & Hart LLP	Washington							
2010	Holland & Knight	Washington	\$418	\$850	\$300	\$499	\$480	\$185	\$288
2010	Holme Roberts & Owen	Denver	\$356	\$635	\$285	\$415	\$530	\$170	\$295
2010	Honigman Miller Schwartz and Cohn	Detroit							
2010	Hughes Hubbard & Reed LLP	New York							
2010	Hunton & Williams	Richmond, VA							
2010	Husch Blackwell	St. Louis	\$329	\$804	\$230	\$357	\$415	\$171	\$220
2010	Ice Miller LLP	Indianapolis							
2010	Irell & Manella	Los Angeles							
2010	Jackson Kelly	Charleston, WV		\$495	\$245		\$275	\$155	
2010	Jackson Lewis	White Plains, NY	\$384	\$715	\$260	\$428	\$440	\$150	\$282
2010	Jones Day	Washington							
2010	Jones, Walker, Waechter, Poitevent, Carrara & Denegre	New Orleans		\$620	\$195		\$275	\$140	
2010	K&L Gates	Pittsburgh							
2010	Kelley Drye & Warren	New York		\$900	\$465		\$565	\$275	
2010	Kenyon & Kenyon LLP	New York							

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Kilpatrick Stockton	Allentia	\$425	\$730	\$375	\$527	\$465	\$225	\$320
2010	Kirkland & Ellis	Chicago							
2010	Knobbe, Martens, Olson & Bear	Irvine, CA	\$432	\$710	\$395	\$511	\$450	\$285	\$332
2010	Kramer Levin Natfalis & Frankel	New York							
2010	Lane Powell	Seattle	\$349	\$600	\$310	\$431	\$350	\$230	\$278
2010	Lathrop & Gage	Kansas City		\$490	\$255		\$265	\$180	
2010	LeClairRyan, Professional Corporation	Richmond, VA							
2010	Leonard, Street and Debnard	Minneapolis							
2010	Lewis and Roca	Phoenix, AZ							
2010	Lewis Brisbois Bisgaard & Smith	Los Angeles							
2010	Lewis, Rice & Fingersh	St. Louis		\$460	\$250		\$315	\$150	\$235
2010	Lindquist & Vennum	Minneapolis	\$330			\$415			\$296
2010	Littler Mendelson	San Francisco	\$372	\$650	\$290	\$445	\$480	\$210	\$320
2010	Locke Lord Bissell & Liddell	Dallas	\$486	\$1,120	\$400	\$589	\$525	\$215	\$320
2010	Loeb & Loeb	New York		\$975	\$475		\$575	\$275	
2010	Lowenstein Sandler	Roseland, NJ		\$825	\$440		\$575	\$235	
2010	Luce, Forward, Hamilton & Scripps	San Diego		\$670	\$350		\$445	\$245	
2010	Manatt, Phelps & Phillips	Los Angeles	\$568	\$850	\$525	\$651	\$525	\$200	\$405
2010	Marshall, Dennehey, Warner, Coleman & Goggin	Philadelphia		\$410	\$145		\$320	\$130	
2010	Maynard, Cooper & Gate	Birmingham, AL		\$600	\$325		\$295	\$235	
2010	McAndrews, Held & Malloy	Chicago		\$675	\$260		\$850	\$225	

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	McCarter & English	Newark, NJ	\$355	\$825	\$360	\$498	\$405	\$215	\$313
2010	McEroy, Deutsch, Mulvaney & Carpenter	Morristown, N.J.	\$210	\$550	\$295	\$280	\$275	\$150	\$190
2010	McGuireWoods	Richmond, Va.	\$455	\$830	\$325	\$543	\$600	\$220	\$355
2010	McKenna Long & Aldridge	Atlanta	\$455	\$775	\$375	\$540	\$490	\$220	\$366
2010	Michael Best & Friedrich	Milwaukee	\$345	\$650	\$235	\$400	\$320	\$190	\$239
2010	Miles & Stockbridge	Baltimore	\$695	\$695	\$325	\$370	\$370	\$220	\$218
2010	Miller & Martin	Chattanooga, TN	\$328	\$610	\$235	\$361	\$275	\$180	\$218
2010	Miller, Canfield, Paddock and Stone	Detroit							
2010	Montgomery, McCracken, Walker & Rhoads	Philadelphia		\$625	\$380	\$461	\$395	\$205	\$284
2010	Moore & Van Allen	Charlotte, N.C.	\$364	\$785	\$265	\$441	\$360	\$180	\$257
2010	Morgan, Lewis & Bockius	Philadelphia							
2010	Morris, Manning & Martin	Atlanta	\$424	\$760	\$425	\$492	\$545	\$225	\$353
2010	Morrison & Foerster	San Francisco, CA							
2010	Munger, Tolles & Olson	Los Angeles							
2010	Neal, Gerber & Eisenberg	Chicago							
2010	Nelson Mullins Riley & Scarborough	Columbia, SC	\$347	\$850	\$245	\$399	\$335	\$185	\$248
2010	Nexsen Pruet	Columbia, SC		\$625	\$230		\$250	\$160	
2010	Nixon Peabody	New York	\$429	\$905	\$375	\$613	\$580	\$195	\$388
2010	O'Melveny & Myers	Los Angeles							
2010	Ogletree, Deakins, Nash, Smoak & Stewart	Greenville, S.C.	\$351	\$575	\$300	\$389	\$390	\$195	\$285



Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Orrick, Herrington & Sutcliffe	San Francisco, CA							
2010	Parker Poe Adams & Bernstein LLP	Charlotte N.C.							
2010	Patton Boggs	Washington	\$482	\$990	\$355	\$645	\$550	\$215	\$399
2010	Paul, Hastings, Janofsky & Walker	New York							
2010	Paul, Weiss, Rifkind, Wharton & Garrison LLP	New York							
2010	Pepper Hamilton	Philadelphia	\$326	\$825	\$420	\$547	\$465	\$230	\$329
2010	Perkins Cole	Seattle	\$447	\$825	\$275	\$534	\$570	\$200	\$354
2010	Phelps Dunbar	New Orleans	\$226	\$385	\$160	\$272	\$240	\$145	\$183
2010	Phillips Lytle	Buffalo, NY	\$255	\$535	\$260	\$352	\$450	\$150	\$283
2010	Pillsbury Winthrop Shaw Pittman	New York							
2010	Polsinelli Shughart	Kansas City, MO		\$600	\$250		\$325	\$185	
2010	Quarles & Brady	Milwaukee	\$364	\$660	\$290	\$438	\$400	\$210	\$260
2010	Reed Smith	Pittsburgh							
2010	Reinhart Boerner Van Doren	Milwaukee							
2010	Roetzel & Andress	Akron, OH	\$317	\$525	\$225	\$357	\$325	\$165	\$243
2010	Rutan & Tucker	Costa Mesa, CA		\$650	\$355		\$450	\$225	
2010	Saul Ewing	Philadelphia	\$412	\$800	\$320	\$491	\$475	\$225	\$310
2010	Schiff Hardin LLP	Chicago							
2010	Schnader Harrison Segal & Lewis	Philadelphia							
2010	Schulte Roth & Zabel	New York		\$895	\$735		\$690	\$275	
2010	Schwabe, Williamson & Wyatt	Portland, OR	\$350	\$540	\$310	\$415	\$450	\$200	\$260
2010	Sedgwick, Detert, Moran & Arnold	San Francisco							
2010	Seyfarth Shaw	Chicago	\$377	\$770	\$335	\$505	\$535	\$185	\$325

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Sheppard Mullin	Los Angeles		\$820	\$495		\$620	\$270	
2010	Stelman & Howard	New York							
2010	Shook, Hardy & Bacon	Kansas City, MO							
2010	Shumaker, Loop & Kendrick	Toledo, OH	\$331	\$540	\$290	\$366	\$315	\$185	\$246
2010	Skadden, Arps, Slate, Meagher & Flom	New York							
2010	Smith, Gambrell & Russell	Atlanta		\$740	\$325		\$440	\$195	
2010	Snell & Wilmer	Phoenix		\$795	\$315	\$488	\$550	\$175	\$282
2010	Squire, Sanders & Dempsey	Cleveland	\$338						
2010	Steptoe & Johnson LLP	Washington							
2010	Stevens & Lee	Reading, PA							
2010	Stinson Morrison Hecker	Kansas City, MO							
2010	Sites & Harbison	Louisville, KY							
2010	Stoel Rives	Portland, OR	\$381	\$600	\$315	\$441	\$390	\$190	\$270
2010	Strasburger & Price	Dallas	\$336	\$617	\$250	\$372	\$306	\$194	\$243
2010	Sullivan & Worcester	Boston	\$537	\$830	\$475	\$647	\$535	\$290	\$383
2010	Sutherland Asbill & Brennan	Atlanta							
2010	Taft, Stettinius & Hollister	Cincinnati	\$315	\$500	\$220	\$358	\$365	\$165	\$227
2010	Thompson & Knight	Dallas		\$825	\$410		\$440	\$265	
2010	Thompson Coburn	St. Louis		\$610	\$300		\$395	\$190	
2010	Townsend and Townsend and Crew	San Francisco, CA	\$320	\$750	\$470	\$563	\$460	\$260	\$345
2010	Troutman Sanders	Atlanta							
2010	Ulmer & Berne	Cleveland		\$565	\$260		\$375	\$185	
2010	Vedder Price	Chicago	\$425	\$720	\$370	\$483	\$365	\$255	\$326
2010	Venable	Washington	\$484	\$950	\$445	\$590	\$500	\$280	\$353

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Vorys, Sater, Seymour and Peese	Columbus, OH							
2010	Wachtell, Lipton, Rosen & Katz	New York							
2010	Weil, Gotshat & Manges LLP	New York							
2010	White and Williams	Philadelphia							
2010	Wildman, Harrold, Allen & Dixon LLP	Chicago							
2010	Wiley Rein	Washington							
2010	Williams Mullen	Richmond, Va.	\$368	\$645	\$315	\$428	\$370	\$230	\$279
2010	Willkie Farr & Gallagher LLP	New York							
2010	Wilmer Cutler Pickering Hale and Dorr	Washington							
2010	Winstead	Dallas	\$395	\$685	\$340	\$462	\$390	\$215	\$291
2010	Winston & Strawn	Chicago	\$486	\$1,075	\$475	\$670	\$610	\$250	\$393
2010	Wombie Carlyle Sandridge & Rice	Winston Salem, NC	\$372	\$625	\$300	\$461	\$445	\$210	\$291
2010	Wyatt, Tarrant & Combs	Louisville, KY		\$500	\$245		\$285	\$180	



**2010 NLJ Associate Class Billing Survey**  
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Final Year	Firm Name	1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Alston & Bird	\$270 - \$345	\$330 - \$395	\$365 - \$440	\$395 - \$470	\$420 - \$515	\$445 - \$550	\$470 - \$570	
2010	Benesch, Friedlander, Coplan	\$195	\$200	\$215	\$230	\$240	\$250	\$275	
2010	Blank Rome	\$250 - \$275	\$260 - \$290	\$280 - \$305	\$325 - \$360	\$345 - \$400	\$370 - \$435	\$390 - \$460	\$410 - \$480
2010	Brinks Hofer Gilson & Lione	\$240	\$265	\$285	\$310	\$340	\$365	\$390	\$410
2010	Brownstein Hyatt Farber Schreck	\$200							
2010	Bryan Cave	\$185 - \$300	\$215 - \$350	\$250 - \$385	\$275 - \$395	\$300 - \$420	\$275 - \$460	\$330 - \$480	\$340 - \$510
2010	Curtis, Mallet-Prevost, Colt &	\$290	\$335	\$375	\$415	\$455	\$495	\$535	\$575
2010	Davis Wright Tremaine	\$190 - \$285	\$205 - \$295	\$225 - \$325	\$235 - \$345	\$245 - \$365	\$265 - \$380	\$285 - \$405	\$295 - \$415
2010	Dickinson Wright	\$190	\$195	\$205	\$220	\$230	\$240	\$250	
2010	Dickstein Shapiro	\$265 - \$290	\$325 - \$375	\$375 - \$425	\$375 - \$425	\$425 - \$475	\$425 - \$475	\$475 - \$530	\$475 - \$530
2010	Dinsmore & Shohl	\$180	\$190	\$205	\$220	\$230	\$240	\$260	260
2010	Edwards Angell Palmer & Dodge	255	275						
2010	Fitzpatrick, Cella, Harper & Scinto	\$275	\$300	\$325	\$350	\$370	\$385	\$405	\$420

Filed Year	Firm Name	Associate Class											
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year				
2010	Frost Brown Todd	\$150											
2010	Gardere Wynne Sewell	195	210	260	280	300	315	355					385
2010	Harris Beach	\$155	\$170	\$200	\$230	\$230	\$230	\$250					\$250
2010	Hiscock & Barclay	\$150 - \$340	\$150-340	\$165 - \$360	\$165 - \$360	\$165 - \$360	\$175 - \$380	\$175 - \$380	\$175 - \$380	\$185 - \$440			
2010	Kelley Dye & Warren	\$305	\$340	\$370	\$410	\$435	\$455	\$485					510
2010	Kilpatrick Stockton	250	275	310	325	335	360	375					385
2010	Kiobbe Martens Olson & Bear	\$285	\$310	\$335	\$360	\$385							
2010	Lindquist & Vennum	\$200	\$210	225	235	245	260	265					290
2010	Locke Lord Bissell & Liddell	\$215	\$230	\$253	\$270	\$300	\$321	\$349					\$386
2010	Loeb & Loeb	\$350 - \$375											
2010	Maynard, Cooper & Gale	\$235	\$235	\$245	\$255	\$270	\$280	\$295					
2010	McElroy, Deutsch, Mulvaney & Meyer	\$150	\$175	\$185	\$195	\$200	\$205	\$210					\$220
2010	McKenna Long & Aldridge	279	312	325	346	363	381	382					415
2010	Montgomery, McCracken, Walker & Moris	\$205	\$215	\$235	\$255	\$275	\$295	\$315					\$335
2010	Morris, Manning & Martin	\$200	\$265	\$310	\$340	\$365	\$390	\$415					\$425

Year	Firm Name	Assessable Class											
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year				
2010	Frost Brown Todd	\$150											
2010	Gardere Wynne Sewell	195	210	260	280	300	315	355				385	
2010	Harris Beach	\$155	\$170	\$200	\$230	\$230	\$230	\$250				\$250	
2010	Miscock & Barclay	\$150 - \$340	\$150-340	\$165 - \$360	\$165 - \$360	\$165 - \$360	\$175 - \$380	\$175 - \$380	\$175 - \$380	\$185 - \$440			
2010	Kelley Dye & Warren	\$305	\$340	\$370	\$410	\$435	\$455	\$485				510	
2010	Kilpatrick Stockton	250	275	310	325	335	360	375				385	
2010	Knobbe Martens Olson & Bear	\$285	\$310	\$335	\$360	\$385							
2010	Lindquist & Vennum	\$200	\$210	225	235	245	260	265				290	
2010	Locke Lord Bissell & Liddell	\$215	\$230	\$253	\$270	\$300	\$321	\$349				\$386	
2010	Loeb & Loeb	\$350 - \$375											
2010	Maynard, Cooper & Gale	\$235	\$235	\$245	\$255	\$270	\$280	\$295					
2010	McElroy Deutsch, Mulvaney &	\$150	\$175	\$185	\$195	\$200	\$205	\$210				\$220	
2010	McKenna Long & Aldridge	279	312	325	346	363	381	382				415	
2010	Montgomery, McCracken, Walker	\$205	\$215	\$235	\$255	\$275	\$295	\$315				\$335	
2010	Morris, Manning & Martin	\$200	\$265	\$310	\$340	\$365	\$390	\$415				\$425	

Fiscal Year		Associate Class									
Firm Name		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year		
2010	Patton Boggs	\$290	\$315	\$340	\$370	\$400	\$425	\$450	\$480		
2010	Pepper Hamilton	\$230	\$275	\$300	\$330	\$355	\$370	\$385	\$395		
2010	Perkins Cole	272	290	306	337	345	372	391	436		
2010	Phillips Lytle	\$160	\$170	\$190	\$195	\$210	\$225	\$220	235		
2010	Quantes & Brady	\$210 - \$235	\$220 - \$240								
2010	Saul Ewing	\$225 - \$235	\$230 - \$260	\$255 - \$275	\$240 - \$315	\$260 - \$285	\$285 - \$300	\$295 - \$425	\$275 - \$320		
2010	Schutte Roth & Zabel	\$375	\$445	\$495	\$540	\$560	\$580	\$605	\$625		
2010	Schwabe										
2010	Williamson & Wyatt	\$200									
2010	Sheppard, Mullin, Richter & Hampton	\$270 - \$335	\$330 - \$430	\$365 - \$475	\$395 - \$510	\$420 - \$540	\$445 - \$565	\$470 - \$595	\$490 - \$620		
2010	Snell & Wilmer	\$185	\$200	\$225	\$260	\$285	\$315	\$350	\$365		
2010	Strasburger & Price	\$200	\$220	\$240	\$260	\$280	\$300	\$320	\$340		
2010	Sullivan & Worcester	\$290	\$305	\$330	\$350	\$370	\$390	\$425			
2010	Thompson & Knight	\$265	\$300	\$330	\$365	\$385	\$405	\$425	\$440		
2010	Townsend and Townsend and Crew	260	290	325	370	390	420	450	460		
2010	Veeder Price	225	270	290	310	325	345	360	380		

Fiscal Year	Firm Name	Associate Class							
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Williams Mullien	\$230	\$250	\$265	\$295	\$295	\$310	\$345	\$345
2010	Winstead	\$215	215	227	260	280	300	325	350
2010	Winston & Strawn	\$295 - \$320	\$305 - \$335	\$325 - \$365	\$350 - \$400	\$380 - \$440	\$420 - \$460	\$455 - \$520	\$490 - \$555





Font Size:

**Bankruptcy Rates Top \$1,000 Mark in 2008-09**

Amy Kolz  
The American Lawyer  
December 16, 2009

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A review of bankruptcy rates in Delaware and the Southern District of New York shows that a handful of U.S.-based partners at Am Law 200 firms have inched above the \$1,000 rate barrier, making bankruptcy work as lucrative as it was plentiful in 2008 and 2009. Over a 12-month period ending August 2009, there were more than 13,000 billing rate entries submitted by law firms in the nation's two busiest bankruptcy courts, according to a new database compiled by ALM Media.

Among U.S.-based lawyers at Am Law 200 firms, Shearman & Sterling tax partner Bernie Pistillo topped the rate chart with an hourly fee of \$1,065 for his work on the bankruptcy of Stock Building Supply Holdings LLC, a building products supplier, in Delaware. (One solo practitioner in Pleasantville, N.Y., Alan Harris, surpassed Pistillo's rate, charging \$1,200 an hour for his work as special real estate litigation counsel on the bankruptcy of Digital Printing Systems in the Southern District of New York.) Eleven other U.S.-based Am Law 200 partners were in the \$1,000-plus club, according to the database. Cadwalader, Wickersham & Taft financial restructuring co-chair Daryck Palmer, a former Weil, Gotshal & Manges partner, billed Lyondell Chemical Co. at a rate of \$1,050 for work on its 2009 bankruptcy. Greenberg Traurig bankruptcy co-chair Bruce Zirinsky, who left Cadwalader last January, billed \$1,050 an hour as debtor's counsel for TH Agriculture and Nutrition LLC, as did White & Case global restructuring head Thomas Lauria for WCJ Communities Inc., and Robert Pincus, the head of the corporate practice in Skadden, Arps, Slate, Meagher & Flom's Wilmington office, for Hayes Lemmerz International Inc., an automotive wheel supplier.

Neal Stoll, a Skadden antitrust partner, and Sally Thurston, a Skadden tax partner, billed \$1,035 for work on the bankruptcies of VeraSun Energy Corp. and Hayes Lemmerz, respectively, while Latham & Watkins corporate finance chair Kirk Davenport billed at \$1,025 an hour for Dayton Superior Corp.'s filing. Paul Weiss, Rifkind, Wharton & Garrison partners Carl Reiser and Richard Bronstein billed at \$1,025 for the Buffets Inc., bankruptcy. (Reiser is co-head of the firm's M&A practice and Bronstein is co-chair of its tax practice.) Simpson Thacher & Bartlett partners Lee Meyerson and litigator Michael Chepiga charged Lehman Brothers \$1,000 an hour on the sale of its brokerage to Barclays Bank PLC.

Absent from the \$1,000 club are Weil, Gotshal & Manges restructuring gurus Harvey Miller and Marcia Goldstein. Both clocked rates of \$950 an hour for their work on the Lehman Brothers and BearingPoint Inc. bankruptcies, respectively. Also, Kirkland & Ellis' James Sprayregen billed \$965 an hour for work on the bankruptcies of Lear Corp. and The Reader's Digest Association. And Jones Day partner Corinne Ball charged \$900 an hour for her work on Chrysler's filing.

Comparing the median partner rates among Am Law 200 firms in the database demonstrated that there are few bargains when it comes to Chapter 11 work. Among those charging median partner rates of more than \$900 an hour were: Cadwalader; Cleary Gottlieb Steen & Hamilton; Davis Polk & Wardwell; Milbank, Tweed, Hadley & McCloy; Paul Weiss; Shearman & Sterling; Simpson Thacher; and Skadden. Firms with median partner billing rates between \$800 and \$900 were Gibson Dunn, Fried Frank, Latham, Paul Hastings, Weil Gotshal, and White & Case. Firms billing \$700 or below were Akin Gump Strauss Hauer & Feld, Kirkland, Sidley Austin, and Sonnenschein Nath & Rosenthal. (Medians can be deceiving, since some firms, such as Kirkland, had a difference of more than \$600 between its highest- and lowest-rate partners.)

The bankruptcy case with one of the highest median partner rates was Nortel Networks. The phone equipment maker paid firms such as Cleary and Kirkland a median partner rate of \$940. Firms working on the Lehman filing billed a median partner rate of \$810 during the time period, while firms working on the filing of Tribune Co. billed a median of \$690, according to the database.

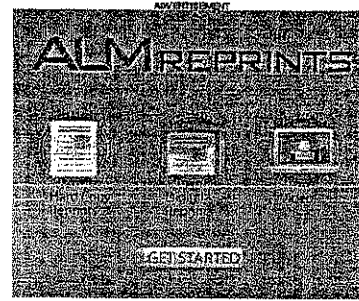
Associate rates occasionally topped \$700 an hour on bankruptcies including Lehman and Nortel Networks, as well as that of the lesser-known Sportsman's Warehouse. Discovery attorneys, research specialists and benefits consultants sometimes billed between \$500 and \$600 on cases such as Nortel, Charter Communications and Graphics Properties Holdings Inc.

FIRM	MEDIAN PARTNER RATE*	# PARTNERS FILING
Simpson Thacher	\$980	30
Cleary Gottlieb	\$960	47
Shearman & Sterling	\$950	17
Davis Polk	\$948	14
Skadden	\$945	38
Paul Weiss	\$925	24
Cadwalader	\$900	29
Milbank	\$900	55
Weil Gotshal	\$843	142
Gibson Dunn	\$840	29
Fried Frank	\$83	518
Latham & Watkins	\$830	57
White & Case	\$825	21
Paul Hastings	\$810	46
Sidley Austin	\$700	99
Akin Gump	\$680	79



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Kirkland	\$675	149
Sonnenschein	\$625	47

\*U.S.-based partners only.

The *American Lawyer* will publish a detailed analysis of the bankruptcy billing rates in its February 2010 issue.

[Click here to order the Excel® version of the 2009 Bankruptcy Billing Rates Report.](#)

*This article first appeared on The Am Law Daily blog on AmericanLawyer.com.*

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*\$1,000 Per Hour Isn't Rare Anymore; Nominal billing levels rise, but discounts ease blow. The National Law Journal January 13, 2014 Monday*

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THE NATIONAL  
**LAW JOURNAL**

The National Law Journal

January 13, 2014 Monday

**SECTION:** NLJ'S BILLING SURVEY; Pg. 1 Vol. 36 No. 20

**LENGTH:** 1860 words

**HEADLINE:** \$1,000 Per Hour **Isn't Rare Anymore;**  
Nominal billing levels rise, but discounts ease blow.

**BYLINE:** KAREN SLOAN

**BODY:**

As recently as five years ago, law partners charging \$1,000 an hour were outliers. Today, four-figure hourly rates for indemand partners at the most prestigious firms don't raise eyebrows-and a few top earners are closing in on \$2,000 an hour.

These rate increases come despite hand-wringing over price pressures from clients amid a tough economy. But everrising standard billing rates also obscure the growing practice of discounts, falling collection rates, and slow march toward alternative fee arrangements.

Nearly 20 percent of the firms included in The National Law Journal's annual survey of large law firm billing rates this year had at least one partner charging more than \$1,000 an hour. Gibson, Dunn & Crutcher partner Theodore Olson had the highest rate recorded in our survey, billing \$1,800 per hour while representing mobile satellite service provider LightSquared Inc. in Chapter 11 proceedings.

Of course, few law firm partners claim Olson's star power. His rate in that case is nearly the twice the \$980 per hour average charged by Gibson Dunn partners and three times the average \$604 hourly rate among partners at NLJ 350 firms. Gibson Dunn chairman and managing partner Ken Doran said Olson's rate is "substantially" above that of other partners at the firm, and that the firm's standard rates are in line with its peers.

"While the majority of Ted Olson's work is done under alternative billing arrangements, his hourly rate reflects his stature in the legal community, the high demand for his services and the unique value that he offers to clients given his extraordinary experience as a former solicitor general of the United States who has argued more than 60 cases before the U.S. Supreme Court and has counseled several presidents," Doran said.

In reviewing billing data this year, we took a new approach, asking each firm on the NLJ 350-our survey of the nation's 350 largest firms by attorney headcount-to provide their highest, lowest and average billing rates for associates and partners. We supplemented those data through public records. All together, this year's survey includes information for 159 of the country's largest law firms and reflects billing rates as of October.

The figures show that, even in a down economy, hiring a large law firm remains a pricey prospect. The median among the highest partner billing rates reported at each firm is \$775 an hour, while the median low partner rate is \$405. For associates, the median high stands at \$510 and the low at \$235. The average associate rate is \$370.

Multiple industry studies show that law firm billing rates continued to climb during 2013 despite efforts by corporate counsel to rein them in. TyMetrix's 2013 Real Rate Report Snapshot found that the average law firm billing rate increased by 4.8 percent compared with 2012. Similarly, the Center for the Study of the Legal Profession at the Georgetown University Law Center and Thomson Reuters Peer Monitor found that law firms increased their rates by an average 3.5 percent during 2013.

Of course, rates charged by firms on paper don't necessarily reflect what clients actually pay. Billing realization rates-which reflect the percentage of work billed at firms' standard rates- have fallen from 89 percent in 2010 to nearly 87 percent in 2013 on average, according to the Georgetown study. When accounting for billed hours actually collected by firms, the realization rate falls to 83.5 percent.

"What this means, of course, is that- on average-law firms are collecting only 83.5 cents for every \$1.00 of standard time they record," the Georgetown report reads. "To understand the full impact, one need only consider that at the end of 2007, the collected realization rate was at the 92 percent level."

In other words, law firms set rates with the understanding that they aren't likely to collect the full amount, said Mark Medice, who oversees the Peer Monitor Index. That index gauges the strength of the legal market according to economic indicators including demand for legal services, productivity, rates and expenses. "Firms start out with the idea of, 'I want to achieve a certain rate, but it's likely that my client will ask for discounts whether or not I increase my rate,'" Medice said.

Indeed, firms bill nearly all hourly work at discounts ranging from 5 percent to 20 percent off standard rates, said Peter Zeughauser, a consultant with the Zeughauser Group. Discounts can run as high as 50 percent for matters billed under a hybrid system, wherein a law firm can earn a premium for keeping costs under a set level or for obtaining a certain outcome, he added. "Most firms have gone to a two-tier system, with what is essentially an aspirational rate that they occasionally get and a lower rate that they actually budget for," he said.

Most of the discounting happens at the front end, when firms and clients negotiate rates, Medice said. But additional discounting happens at the billing and collections stages. Handling alternative fee arrangements and discounts has become so complex that more than half of the law firms on the Am Law 100-NLJ affiliate The American Lawyer's ranking of firms by gross revenue-have created new positions for pricing directors, Zeughauser said.

## THE ROLE OF GEOGRAPHY

Unsurprisingly, rates vary by location. Firms with their largest office in New York had the highest average partner and associate billing rates, at \$882 and \$520, respectively. Similarly, TyMetrix has reported that more than 25 percent of partners at large New York firms charge \$1,000 per

hour or more for contracts and commercial work.

Washington was the next priciest city on our survey, with partners charging an average \$748 and associates \$429. Partners charge an average \$691 in Chicago and associates \$427. In Los Angeles, partners charge an average \$665 while the average associate rate is \$401.

Pricing also depends heavily on practice area, Zeughauser and Medice said. Bet-the-company patent litigation and white-collar litigation largely remain at premium prices, while practices including labor and employment have come under huge pressure to reduce prices.

"If there was a way for law firms to hold rates, they would do it. They recognize how sensitive clients are to price increases," Zeughauser said. But declining profit margins—due in part to higher technology costs and the expensive lateral hiring market—mean that firms simply lack the option to keep rates flat, he said.

**BILLING SURVEY METHODOLOGY**

The National Law Journal's survey of billing rates of the largest U.S. law firms provides the high, low and average rates for partners and associates.

The NLJ asked respondents to its annual survey of the nation's largest law firms (the NLJ 350) to provide a range of hourly billing rates for partners and associates as of October 2013.

For firms that did not supply data to us, in many cases we were able to supplement billing-rate data derived from public records.

In total, we have rates for 159 of the nation's 350 largest firms.

Rates data include averages, highs and low rates for partners and associates. Information also includes the average full-time equivalent (FTE) attorneys at the firm and the city of the firm's principal or largest office.

We used these data to calculate averages for the nation as a whole and for selected cities.

**Billing Rates at the Country's Priciest Law Firms**

Here are the 50 firms that charge the highest average hourly rates for partners.

**Billing Rates at the Country's Priciest Law Firms**

FIRM NAME	LARGEST U.S. OFFICE*	AVERAGE FULL-TIME EQUIVALENT ATTORNEYS*	PARTNER HOURLY RATES		ASSOCIATE HOURLY RATES	
			AVERAGE	HIGH	LOW	AVERAGE

\* Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. For complete numbers, please see [NLJ.com](http://NLJ.com).

\*\* Firm did not exist in this form for the entire year.

Debevoise & Plimpton	New York	615	\$1,055	\$1,075	\$955	\$490	\$760	\$120
Paul, Weiss,	New York	803	\$1,040	\$1,120	\$760	\$600	\$760	\$250

Rifkind, Wharton & Garrison									
Skadden, Arps, Slate, Meagher & Flom	New York	1,735	\$1,035	\$1,150	\$845	\$620	\$845	\$340	
Fried, Frank, Harris, Shriver & Jacobson	New York	476	\$1,000	\$1,100	\$930	\$595	\$760	\$375	
Latham & Watkins	New York	2,033	\$990	\$1,110	\$895	\$605	\$725	\$465	
Gibson, Dunn & Crutcher	New York	1,086	\$980	\$1,800	\$765	\$590	\$930	\$175	
Davis Polk & Wardwell	New York	787	\$975	\$985	\$850	\$615	\$975	\$130	
Willkie Farr & Gallagher	New York	540	\$950	\$1,090	\$790	\$580	\$790	\$350	
Cadwalader, Wickersham & Taft	New York	435	\$930	\$1,050	\$800	\$605	\$750	\$395	
Weil, Gotshal & Manges	New York	1,201	\$930	\$1,075	\$625	\$600	\$790	\$300	
Quinn Emanuel Urquhart & Sullivan	New York	697	\$915	\$1,075	\$810	\$410	\$675	\$320	
Wilmer Cutler Pickering Hale and Dorr	Washington	961	\$905	\$1,250	\$735	\$290	\$695	\$75	
Dechert	New York	803	\$900	\$1,095	\$670	\$530	\$735	\$395	
Andrews Kurth	Houston	348	\$890	\$1,090	\$745	\$528	\$785	\$265	
Hughes Hubbard & Reed	New York	344	\$890	\$995	\$725	\$555	\$675	\$365	
Irell & Manella	Los Angeles	164	\$890	\$975	\$800	\$535	\$750	\$395	
Proskauer Rose	New York	746	\$880	\$950	\$725	\$465	\$675	\$295	
White & Case	New York	1,900	\$875	\$1,050	\$700	\$525	\$1,050	\$220	
Morrison & Foerster	San Francisco	1,010	\$865	\$1,195	\$595	\$525	\$725	\$230	
Pillsbury Winthrop Shaw Pittman	Washington	609	\$865	\$1,070	\$615	\$520	\$860	\$375	
Kaye Scholer	New York	414	\$860	\$1,080	\$715	\$510	\$680	\$320	
Kramer Levin Naftalis & Frankel	New York	320	\$845	\$1,025	\$740	\$590	\$750	\$400	
Hogan Lovells	Washington	2,280	\$835	\$1,000	\$705	-	-	-	



Kasowitz, Benson, Torres & Friedman	New York	365	\$835	\$1,195	\$600	\$340	\$625	\$200
Kirkland & Ellis	Chicago	1,517	\$825	\$995	\$590	\$540	\$715	\$235
Cooley	Palo Alto	632	\$820	\$990	\$660	\$525	\$630	\$160
Arnold & Porter	Washington	748	\$815	\$950	\$670	\$500	\$610	\$345
Paul Hastings	New York	899	\$815	\$900	\$750	\$540	\$755	\$335
Curtis, Mallet- Prevost, Colt & Mosle	New York	322	\$800	\$860	\$730	\$480	\$785	\$345
Winston & Strawn	Chicago	842	\$800	\$995	\$650	\$520	\$590	\$425
Bingham McCutchen	Boston	900	\$795	\$1,080	\$220	\$450	\$605	\$185
Akin Gump Strauss Hauer & Feld	Washington	806	\$785	\$1,220	\$615	\$525	\$660	\$365
Covington & Burling	Washington	738	\$780	\$890	\$605	\$415	\$565	\$320
King & Spalding	Atlanta	838	\$775	\$995	\$545	\$460	\$735	\$125
Norton Rose Fulbright	N/A**	N/A**	\$775	\$900	\$525	\$400	\$515	\$300
DLA Piper	New York	4,036	\$765	\$1,025	\$450	\$510	\$750	\$250
Bracewell & Giuliani	Houston	432	\$760	\$1,125	\$575	\$440	\$700	\$275
Baker & McKenzie	Chicago	4,004	\$755	\$1,130	\$260	\$395	\$925	\$100
Dickstein Shapiro	Washington	308	\$750	\$1,250	\$590	\$475	\$585	\$310
Jenner & Block	Chicago	432	\$745	\$925	\$565	\$465	\$550	\$380
Jones Day	New York	2,363	\$745	\$975	\$445	\$435	\$775	\$205
Manatt, Phelps & Phillips	Los Angeles	325	\$740	\$795	\$640	-	-	-
Seward & Kissel	New York	152	\$735	\$850	\$625	\$400	\$600	\$290
O'Melveny & Myers	Los Angeles	738	\$715	\$950	\$615	-	-	-
McDermott Will & Emery	Chicago	1,024	\$710	\$835	\$525	-	-	-
Reed Smith	Pittsburgh	1,468	\$710	\$945	\$545	\$420	\$530	\$295
Dentons	N/A**	N/A**	\$700	\$1,050	\$345	\$425	\$685	\$210
Jeffer Mangels Butler & Mitchell	Los Angeles	126	\$690	\$875	\$560	-	-	-
Sheppard,	Los	521	\$685	\$875	\$490	\$415	\$535	\$275

Mullin, Richter Angeles  
& Hampton

Alston & Bird Atlanta 805 \$675 \$875 \$495 \$425 \$575 \$280

THE FOUR-FIGURE CLUB

These 10 firms posted the highest partner billing rates.

**THE FOUR-FIGURE CLUB**

Gibson, Dunn & Crutcher	\$1,800
Dickstein Shapiro	\$1,250
Wilmer Cutler Pickering Hale and Dorr	\$1,250
Akin Gump Strauss Hauer & Feld	\$1,220
Kasowitz, Benson, Torres & Friedman	\$1,195
Morrison & Foerster	\$1,195
Skadden, Arps, Slate, Meagher & Flom	\$1,150
Baker & McKenzie	\$1,130
Bracewell & Giuliani	\$1,125
Paul, Weiss, Rifkind, Wharton & Garrison	\$1,120

Contact Karen Sloan at [ksloan@alm.com](mailto:ksloan@alm.com)

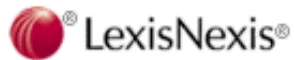
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**BURSOR & FISHER**  
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888 SEVENTH AVENUE  
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[www.bursor.com](http://www.bursor.com)

Dear Ignacio Perez,

06/08/2016

This letter is to confirm that you (the Client) have retained Bursor & Fisher, P.A. to help you stop unwanted phone calls you have received from RASH CURTIS & ASSOCIATES and to pursue class action claims related to alleged violations of the Telephone Consumer Protection Act ( TCPA ), and related claims.

We agree to represent you on a fully contingent basis and to advance all costs and expenses. This means that regardless of the result, we will never ask you to go out-of-pocket for any expense, but we will wait and recoup these expenses from any recovery. Alternatively, we may ask the court to award us attorneys' fees, costs and/or expenses to be paid by the defendants or as a portion of any recovery. We may also negotiate with defendants to get one or more defendants to pay your attorneys' fees. We agree that if your case is settled prior to a ruling on a dispositive motion, we shall receive a contingent fee of 33.33% of any recovery, or alternatively such additional fee as paid by the defendant. If your case settles after a ruling on a dispositive motion, or after a mediation, arbitration, or trial, we shall receive a contingent fee of 40% of any recovery, or alternatively such additional fee as paid by the defendant. The contingent fee will be calculated based on the total amount of the recovery prior to costs and expenses being deducted. These rates are not set by law but are negotiable between the attorney and client.

This will also confirm that you agree to provide us with reasonable cooperation as required to prosecute this action. You understand that we may, at our discretion, employ and/or work with other attorneys or firms to prosecute this case. You also understand that the materials compiled by our firm and the lawyers working with us constitutes the work product and property of our firm, over which our firm will retain complete control with respect to its use and/or disclosure.

Very truly yours,



Scott A. Bursor

**PLEASE SIGN TO CONFIRM YOUR AGREEMENT**



Signature \_\_\_\_\_ Date 06/08/2016



**Bursor & Fisher, P.A. - Perez 1 & 2 Expenses (3/4/2016 - 8/18/2021)**

\$1,066.00	Filing Expenses
\$71,999.13	Transcript Expenses
\$335,039.47	Expert Expenses
\$13,989.72	Mediation Expenses
\$24,430.17	Notice Administration Fees
\$27,225.35	eDiscovery Expenses
\$29,679.34	Third Party Litigation Support Expenses
\$3,073.91	Postage & Delivery Expenses
\$4,067.87	Catering & Meal Expenses
\$45,954.84	Travel & Lodging Expenses
<b>\$556,525.80</b>	<b>Total Perez 1 &amp; 2 Expenses</b>

**Filing Expenses**

<b>DATE</b>	<b>MATTER</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
2016.06.17	<i>Perez 1</i>	\$400.00	US District Court NDCA - Complaint Filing
2017.10.27	<i>Perez 1</i>	\$30.00	Courtcall
2017.11.03	<i>Perez 1</i>	\$86.00	Courtcall
2017.11.16	<i>Perez 1</i>	\$30.00	Courtcall
2017.11.28	<i>Perez 1</i>	\$30.00	Courtcall
2018.09.25	<i>Perez 1</i>	\$30.00	Courtcall
2018.09.27	<i>Perez 1</i>	\$30.00	Courtcall
2018.09.28	<i>Perez 1</i>	\$30.00	Courtcall
2019.11.05	<i>Perez 1</i>	\$400.00	USDC NDCA - Indian Harbor Complaint
		<b>\$1,066.00</b>	<b>Total Filing Expenses</b>

**Transcript Expenses**

<b>DATE</b>	<b>MATTER</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
2017.05.01	<i>Perez 1</i>	\$833.90	Veritext - Kizer Transcript
2017.05.09	<i>Perez 1</i>	\$1,075.00	Veritext - Kizer Video
2017.11.06	<i>Perez 1</i>	\$14.55	Joan Marie Columbini - 8-17 Hearing Transcript
2017.11.14	<i>Perez 1</i>	\$737.00	Veritext - Keith Video
2017.11.14	<i>Perez 1</i>	\$1,378.25	Veritext - Correa Transcript & Video
2017.11.30	<i>Perez 1</i>	\$1,221.50	Veritext - Paff & Keith Transcript and Video
2018.02.01	<i>Perez 1</i>	\$54.30	Joan Columbini, CSR
2018.02.07	<i>Perez 1</i>	\$206.00	Sarah Goekler, CSR
2018.02.23	<i>Perez 1</i>	\$299.37	Aiken Welch - Court Reporter
2019.01.11	<i>Perez 1</i>	\$600.00	Kempfer Court Reporting
2019.03.08	<i>Perez 1</i>	\$1,558.48	Aiken Welch Court Reporters - 1/7 Depo
2019.03.21	<i>Perez 1</i>	\$398.75	Diane Skillman, CSR
2019.04.01	<i>Perez 1</i>	\$572.75	Pamela A. Batalo, CSR
2019.04.02	<i>Perez 1</i>	\$188.50	Leo Mankiewicz, CSR
2019.04.10	<i>Perez 1</i>	\$21.75	Leo Mankiewicz, CSR
2019.05.06	<i>Perez 1</i>	\$4,338.00	Diane Skillman, CSR
2019.05.06	<i>Perez 1</i>	\$406.12	Diane Skillman, CSR
2019.12.04	<i>Perez 1</i>	\$52.50	Pamela A. Batalo, CSR
2019.03.03	<i>Perez 1</i>	\$304.50	Pamela A. Batalo, CSR
2020.03.12	<i>Perez 2</i>	\$14.50	Pamela Batalo Hebel, CSR

2020.07.09	Perez 2	\$130.50	Diane Skillman, CSR
2020.07.16	Perez 2	\$67.55	Ruth Levine Ekhaus, CSR
2020.08.19	Perez 2	\$16.50	Raynee H. Mercado, CSR
2021.02.25	Perez 2	\$4,065.15	Veritext - 2/23 Wild Transcript
2021.03.02	Perez 2	\$1,589.50	Esquire Solutions - 2/2 Krivoshey Transcript
2021.03.02	Perez 2	\$690.90	Esquire Solutions - 2/4 Fisher Transcript
2021.03.22	Perez 2	\$6,628.50	Veritext - 3/12 Williams Transcript
2021.04.09	Perez 2	\$2,339.00	Veritext - 3/12 Williams Video
2021.04.09	Perez 2	\$1,685.00	Veritext - 2/23 Wild Video
2021.04.14	Perez 2	\$2,610.18	Esquire Solutions - 3/30 Paff Transcript
2021.04.14	Perez 2	\$3,424.05	Esquire Solutions -3/29 Keith Transcript
2021.04.22	Perez 2	\$4,266.10	Veritext - 4/14 Markoutsis Transcript
2021.04.22	Perez 2	\$3,096.05	Veritext - 4/8 Ellis Transcript
2021.04.22	Perez 2	\$1,916.90	Veritext - 4/9 Valenti Transcript
2021.04.30	Perez 2	\$308.75	Esquire Solutions - 4/16 Ellis Video
2021.05.07	Perez 2	\$1,168.18	Esquire Solutions - 4/15 Kizer Transcript
2021.05.14	Perez 2	\$1,673.00	Veritext - 4/8 Ellis Video
2021.05.14	Perez 2	\$3,736.35	Veritext - 4/21 Williams Transcript (Vol. 2)
2021.05.14	Perez 2	\$797.00	Veritext - 4/9 Valenti Video
2021.05.14	Perez 2	\$3,662.35	Esquire Depo Solutions LLC - 4/28 Keith Transcript Vol . 2
2021.05.14	Perez 2	\$1,098.35	Esquire Depo Solutions LLC - 4/1 Johnson Transcript
2021.05.14	Perez 2	\$2,708.60	Esquire Depo Solutions LLC - 4/6 Paff Transcript
2021.05.14	Perez 2	\$2,590.35	Esquire Depo Solutions LLC - 4/16 Ellis Transcript
2021.06.30	Perez 2	\$724.70	Esquire Depo Solutions - 4/2 Sedliak transcript
2021.06.30	Perez 2	\$2,012.00	Veritext - 4/14 Markoutsis Video
2021.06.30	Perez 2	\$1,451.00	Veritext - 4/21 Williams Video (Vol. 2)
			Esquire Deposition Solutions LLC - 7/9 Frangiamore & 7/14 McKinnon
2021.07.28	Perez 2	\$3,172.65	Transcripts
2021.08.13	Perez 2	\$94.25	Raynee H. Mercado, CSR
		<b>\$71,999.13</b>	<b>Total Transcript Expenses</b>

#### Expert Expenses

DATE	MATTER	AMOUNT	DESCRIPTION
2017.05.09	Perez 1	\$450.00	Economics and Technology, Inc.
2017.06.06	Perez 1	\$3,150.00	Economics and Technology, Inc.
2017.06.06	Perez 1	\$4,692.50	Wireless Research Services, LLC
2017.09.07	Perez 1	\$450.00	Economics and Technology, Inc.
2017.10.24	Perez 1	\$3,942.50	Wireless Research Services, LLC
2017.12.05	Perez 1	\$2,400.00	Economics and Technology, Inc.
2018.01.03	Perez 1	\$4,650.00	Economics and Technology, Inc.
2018.01.03	Perez 1	\$3,942.50	Wireless Research Services, LLC
2018.02.05	Perez 1	\$5,000.00	Economics and Technology, Inc.
2018.03.05	Perez 1	\$2,161.36	Economics and Technology, Inc.
2018.04.05	Perez 1	\$3,961.36	Economics and Technology, Inc.
2018.04.05	Perez 1	\$16,972.63	Class Experts Group, LLC
2018.08.13	Perez 1	\$150.00	Economics and Technology, Inc.
2018.09.18	Perez 1	\$9,750.00	Economics and Technology, Inc.
2018.10.09	Perez 1	\$12,418.00	Economics and Technology, Inc.
2018.11.09	Perez 1	\$11,700.00	Economics and Technology, Inc.
2018.11.28	Perez 1	\$2,802.50	Wireless Research Services, LLC
2018.12.04	Perez 1	\$42,407.84	Class Experts Group, LLC

2018.12.17	<i>Perez 1</i>	\$3,750.00	Economics and Technology, Inc.
2018.12.19	<i>Perez 1</i>	\$6,010.29	Wireless Research Services, LLC
2019.01.07	<i>Perez 1</i>	\$4,946.50	Class Experts Group, LLC
2019.01.17	<i>Perez 1</i>	\$11,358.49	Economics and Technology, Inc.
2019.02.11	<i>Perez 1</i>	\$1,650.00	Economics and Technology, Inc.
2019.04.18	<i>Perez 1</i>	\$2,550.00	Economics and Technology, Inc.
2019.05.13	<i>Perez 1</i>	\$8,982.70	Wireless Research Services LLC
2019.05.20	<i>Perez 1</i>	\$450.00	Economics and Technology, Inc.
2019.06.19	<i>Perez 1</i>	\$29,011.15	Economics and Technology, Inc.
2019.07.24	<i>Perez 1</i>	\$21,488.15	Class Experts Group, LLC
2021.05.06	<i>Perez 2</i>	\$600.00	Economics & Technology, Inc.
2021.05.14	<i>Perez 2</i>	\$27,283.00	Wood, LLP
2021.06.02	<i>Perez 2</i>	\$21,003.50	2nd Insight, Inc. - Frangiamore
2021.06.07	<i>Perez 2</i>	\$1,993.50	Wood, LLP
2021.07.06	<i>Perez 2</i>	\$8,330.00	2nd Insight, Inc. - Frangiamore
2021.07.28	<i>Perez 2</i>	\$10,850.00	Claims Resource Management, Inc. - McKinnon
2021.08.06	<i>Perez 2</i>	\$4,225.00	Economics & Technology, Inc.
2021.08.12	<i>Perez 2</i>	\$16,870.00	Class Experts Group, LLC
2021.08.12	<i>Perez 2</i>	\$18,623.50	2nd Insight, Inc. - Frangiamore
2021.08.16	<i>Perez 2</i>	\$4,062.50	Economics & Technology, Inc.
		<b>\$335,039.47</b>	<b>Total Expert Expenses</b>

**Mediation Expenses**

<b>DATE</b>	<b>MATTER</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
2017.07.05	<i>Perez 1</i>	\$2,945.00	Judicate West
2020.06.09	<i>Perez 2</i>	\$6,594.72	JAMS, Inc.
2021.06.28	<i>Perez 2</i>	\$4,450.00	JAMS, Inc.
		<b>\$13,989.72</b>	<b>Total Mediation Expenses</b>

**Notice Administration Fees**

<b>DATE</b>	<b>MATTER</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
2019.06.05	<i>Perez 1</i>	\$20,797.96	KCC
2019.07.24	<i>Perez 1</i>	\$3,482.21	KCC
2019.09.05	<i>Perez 1</i>	\$150.00	KCC
		<b>\$24,430.17</b>	<b>Total Notice Administration Fees</b>

**eDiscovery Expenses**

<b>DATE</b>	<b>MATTER</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
2020.10.13	<i>Perez 2</i>	\$12,152.65	JND eDiscovery
2020.11.19	<i>Perez 2</i>	\$2,296.44	JND eDiscovery
2020.12.14	<i>Perez 2</i>	\$1,434.58	JND eDiscovery
2021.01.13	<i>Perez 2</i>	\$1,322.08	JND eDiscovery
2021.02.24	<i>Perez 2</i>	\$1,473.20	JND eDiscovery
2021.03.22	<i>Perez 2</i>	\$1,660.70	JND eDiscovery
2021.04.22	<i>Perez 2</i>	\$1,437.14	JND eDiscovery
2021.05.14	<i>Perez 2</i>	\$1,474.64	JND eDiscovery
2021.06.30	<i>Perez 2</i>	\$1,324.64	JND eDiscovery



2021.07.14	<i>Perez 2</i>	\$1,324.64	JND eDiscovery
2021.08.12	<i>Perez 2</i>	\$1,324.64	JND eDiscovery
		<b>\$27,225.35</b>	<b>Total eDiscovery Expenses</b>

### Third Party Litigation Support Expenses

DATE	MATTER	AMOUNT	DESCRIPTION
2017.10.11	<i>Perez 1</i>	\$41.27	WinZip - Discovery tool
2017.10.11	<i>Perez 1</i>	\$69.00	Systool Group - Discovery tool
2018.02.12	<i>Perez 1</i>	\$3,303.12	DAKCS - Debt Collection Software
2019.04.12	<i>Perez 1</i>	\$670.92	Quivx
2019.04.12	<i>Perez 1</i>	\$692.02	Quivx
2019.04.12	<i>Perez 1</i>	\$748.44	Quivx
2019.06.14	<i>Perez 1</i>	\$788.00	Visualize Legal
2019.06.14	<i>Perez 1</i>	\$2,073.39	Quivx
2019.11.05	<i>Perez 1</i>	\$1,817.40	First Legal - Complaint Service
2020.07.29	<i>Perez 2</i>	\$140.45	Systoolsgroup - Email production PDF conversion software
2020.08.01	<i>Perez 2</i>	\$9,435.47	B Squared - Email production printing
2020.09.25	<i>Perez 2</i>	\$7,998.94	First Legal - Insurance Policy Translations
2021.03.09	<i>Perez 2</i>	\$1,900.92	Quivx
		<b>\$29,679.34</b>	<b>Total Third Party Litigation Support Expenses</b>

### Postage & Delivery Expenses

DATE	MATTER	AMOUNT	DESCRIPTION
2017.06.02	<i>Perez 1</i>	\$54.28	Golden State Overnight - Chamber Copies
2017.09.19	<i>Perez 1</i>	\$48.13	Golden State Overnight - Chamber Copies
2017.12.02	<i>Perez 1</i>	\$57.87	FedEx
2017.12.06	<i>Perez 1</i>	\$36.47	FedEx
2017.12.13	<i>Perez 1</i>	\$76.06	FedEx
2017.12.23	<i>Perez 1</i>	\$5.29	USPS
2018.02.02	<i>Perez 1</i>	\$168.15	First Legal - Chamber Delivery
2018.02.14	<i>Perez 1</i>	\$31.41	FedEx
2018.02.15	<i>Perez 1</i>	\$71.55	Golden State Overnight - Chamber Copies
2018.02.24	<i>Perez 1</i>	\$38.07	FedEx
2018.03.02	<i>Perez 1</i>	\$23.85	Golden State Overnight - Chamber Copies
2018.03.15	<i>Perez 1</i>	\$38.07	Fedex
2018.03.19	<i>Perez 1</i>	\$17.94	Golden State Overnight - Chamber Copies
2018.05.02	<i>Perez 1</i>	\$18.00	Golden State Overnight - Chamber Copies
2018.05.17	<i>Perez 1</i>	\$24.17	Golden State Overnight - Chamber Copies
2018.06.04	<i>Perez 1</i>	\$18.18	Golden State Overnight - Chamber Copies
2018.07.17	<i>Perez 1</i>	\$25.59	Golden State Overnight - Chamber Copies
2018.08.02	<i>Perez 1</i>	\$25.59	Golden State Overnight - Chamber Copies
2018.08.17	<i>Perez 1</i>	\$53.35	Golden State Overnight - Chamber Copies
2018.09.05	<i>Perez 1</i>	\$24.17	Golden State Overnight - Chamber Copies
2018.10.02	<i>Perez 1</i>	\$71.53	Golden State Overnight - Chamber Copies
2018.10.17	<i>Perez 1</i>	\$18.26	Golden State Overnight - Chamber Copies
2018.10.20	<i>Perez 1</i>	\$30.03	FedEx
2018.11.02	<i>Perez 1</i>	\$24.27	Golden State Overnight - Chamber Copies
2018.11.19	<i>Perez 1</i>	\$44.04	Golden State Overnight - Chamber Copies
2019.02.19	<i>Perez 1</i>	\$29.29	Golden State Overnight - Chamber Copies

2019.03.04	Perez 1	\$34.22	Golden State Overnight - Chamber Copies
2019.03.19	Perez 1	\$23.85	Golden State Overnight - Chamber Copies
2019.04.02	Perez 1	\$17.94	Golden State Overnight - Chamber Copies
2019.04.17	Perez 1	\$29.68	Golden State Overnight - Chamber Copies
2019.04.20	Perez 1	\$90.15	Fedex
2019.04.26	Perez 1	\$56.98	Optional Delivery Systems - Chamber copy
2019.05.03	Perez 1	\$54.67	Optional Delivery Systems
2019.05.06	Perez 1	\$109.34	Optional Delivery Systems - Chamber copy
2019.05.07	Perez 1	\$24.00	Golden State Overnight - Chamber Copies
2019.05.07	Perez 1	\$48.43	FedEx
2019.05.07	Perez 1	\$51.16	FedEx
2019.05.09	Perez 1	\$58.04	FedEx
2019.05.11	Perez 1	\$22.93	FedEx
2019.05.13	Perez 1	\$125.84	Optional Delivery Systems
2019.05.17	Perez 1	\$18.58	Golden State Overnight - Chamber Copies
2019.06.04	Perez 1	\$24.70	Golden State Overnight - Chamber Copies
2019.10.02	Perez 1	\$21.20	Golden State Overnight
2019.10.08	Perez 1	\$130.73	FedEx
2019.10.11	Perez 1	\$175.12	FedEx
2019.10.17	Perez 1	\$51.62	Golden State Overnight
2019.10.17	Perez 1	\$18.42	Golden State Overnight
2019.10.18	Perez 1	\$112.39	FedEx
2019.10.18	Perez 1	\$25.81	Golden State Overnight
2019.10.20	Perez 1	\$130.13	FedEx
2019.10.31	Perez 1	\$25.81	Golden State Overnight
2019.11.19	Perez 1	\$157.15	FedEx
2019.12.20	Perez 1	\$18.42	Golden State Overnight
2019.12.27	Perez 1	\$25.81	Golden State Overnight
2020.01.17	Perez 1	\$25.35	Golden State Overnight
2020.02.05	Perez 1	\$36.38	Golden State Overnight
2020.04.17	Perez 2	\$18.99	Golden State Overnight
2021.02.14	Perez 2	\$159.18	Fedex
2021.07.22	Perez 2	\$77.28	Fedex
		<b>\$3,073.91</b>	<b>Total Postage &amp; Delivery Expenses</b>

#### Catering & Meal Expenses

DATE	MATTER	AMOUNT	DESCRIPTION
2016.10.03	Perez 1	\$4.90	Starbucks
2017.04.13	Perez 1	\$17.00	A Sweet Affair
2017.07.11	Perez 1	\$55.38	A Sweet Affair
2017.07.12	Perez 1	\$35.23	The Firehoue
2017.07.13	Perez 1	\$5.95	Ranis Gift Shop
2017.07.13	Perez 1	\$52.72	Roxy
2017.08.17	Perez 1	\$2.49	Regent Café
2017.09.26	Perez 1	\$27.17	Sammy's Restaurant
2017.09.26	Perez 1	\$28.41	Quik Stop
2017.10.17	Perez 1	\$5.64	Regent Café
2017.10.17	Perez 1	\$7.12	Regent Café
2017.10.19	Perez 1	\$24.97	PF Changs
2018.01.30	Perez 1	\$39.77	FAZ Restaurant Oakland
2018.08.27	Perez 1	\$56.98	FAZ Restaurant

2018.09.05	Perez 1	\$28.16	Cracker Barrel
2018.12.04	Perez 1	\$12.60	Woody Creek Bakery
2018.12.04	Perez 1	\$14.59	Chilis Too Oak
2018.12.05	Perez 1	\$20.47	St Paul Fish Co
2018.12.05	Perez 1	\$61.99	Onesto
2018.12.06	Perez 1	\$16.21	Mike Pizzeria
2018.12.11	Perez 1	\$3.11	Eden Plaza
2018.12.16	Perez 1	\$6.00	Pacific Renaissance
2018.12.17	Perez 1	\$1.29	Eden Plaza
2018.12.17	Perez 1	\$3.11	Eden Plaza
2018.12.17	Perez 1	\$11.14	Courtyard Oakland
2019.03.19	Perez 1	\$15.14	Sorabol Korean BBQ
2019.03.28	Perez 1	\$16.57	Chili's
2019.03.28	Perez 1	\$18.12	Sorabol Korean BBQ
2019.03.29	Perez 1	\$119.59	Maria Maria
2019.03.30	Perez 1	\$25.63	Lark Creek Grill
2019.04.28	Perez 1	\$12.00	5th & Mission GA
2019.04.28	Perez 1	\$38.21	Restaurant - Pretrial prep
2019.05.01	Perez 1	\$190.19	Doordash
2019.05.02	Perez 1	\$42.19	Jaguar
2019.05.02	Perez 1	\$105.64	Doordash
2019.05.03	Perez 1	\$55.44	Yard House
2019.05.03	Perez 1	\$39.65	Doordash
2019.05.03	Perez 1	\$149.29	Doordash
2019.05.04	Perez 1	\$23.27	Pasta Moto San Francisco
2019.05.05	Perez 1	\$55.19	Saroms Southern Kitchen
2019.05.05	Perez 1	\$103.85	Zacharys Chicago Pizza
2019.05.05	Perez 1	\$292.96	Restaurant - Trial prep
2019.05.06	Perez 1	\$7.13	Super Duper
2019.05.07	Perez 1	\$76.86	Otaez Mex Res
2019.05.08	Perez 1	\$47.16	Chipotle
2019.05.09	Perez 1	\$83.49	Doordash
2019.05.09	Perez 1	\$145.43	Kincaids Oakland
2019.05.09	Perez 1	\$32.64	A Sweet Affair
2019.05.10	Perez 1	\$100.58	Scala's Bistro & Bar Drake
2019.05.10	Perez 1	\$41.00	Chipotle
2019.05.10	Perez 1	\$83.28	The Cooperage American Lafayette
2019.05.10	Perez 1	\$27.40	Bagel Street Café
2019.05.12	Perez 1	\$52.32	Ippudo
2019.05.13	Perez 1	\$46.60	Ippudo
2019.05.13	Perez 1	\$52.70	Valencia Street
2019.05.13	Perez 1	\$206.29	Kincaids Oakland
2019.05.13	Perez 1	\$221.23	Rooftop Restaurant
2019.05.31	Perez 1	\$36.04	Saroms Southern Kitchen
2019.06.12	Perez 1	\$5.09	Regent School Catering
2019.06.12	Perez 1	\$12.91	Regent School Catering
2020.02.26	Perez 1	\$404.19	Team Dinner after hearing re MTDs, Mot. to Vacate
2020.02.26	Perez 1	\$12.79	Super Duper Burger
2021.02.23	Perez 2	\$33.50	Uber Eats
2021.03.12	Perez 2	\$40.92	Jimmy Johns - Deposition Lunch
2021.03.13	Perez 2	\$77.11	Uber Eats - Deposition Dinner
2021.03.29	Perez 2	\$16.83	Jimmy Johns - Deposition Lunch
2021.04.01	Perez 2	\$25.18	Uber Eats - Deposition Dinner

2021.04.06	Perez 2	\$2.00	Uber Eats
2021.04.06	Perez 2	\$26.18	Uber Eats
2021.04.15	Perez 2	\$23.77	Uber Eats
2021.04.29	Perez 2	\$281.92	Truluck's Seafood
		<b>\$4,067.87</b>	<b>Total Catering &amp; Meal Expenses</b>

#### Travel & Lodging Expenses

DATE	MATTER	AMOUNT	DESCRIPTION
2016.10.03	Perez 1	\$20.00	BART
2017.05.01	Perez 1	\$8.00	Lyft
2017.05.02	Perez 1	\$10.42	Lyft
2017.07.12	Perez 1	\$1.75	City of Sacramento Parking
2017.07.14	Perez 1	\$303.15	Double Tree
2017.08.16	Perez 1	\$10.50	BART
2017.08.17	Perez 1	\$12.32	Lyft
2017.08.18	Perez 1	\$7.00	Lyft
2017.09.28	Perez 1	\$6.00	BART
2017.09.29	Perez 1	\$9.00	Lyft
2017.10.17	Perez 1	\$10.50	BART
2017.10.17	Perez 1	\$8.00	Lyft
2017.10.19	Perez 1	\$2.00	Bay Street Garage
2017.10.20	Perez 1	\$18.00	ACE Parking
2017.10.20	Perez 1	\$18.00	ACE Parking
2017.11.06	Perez 1	\$110.05	Yeremey Krivoshey-Travel to Perez Meeting
2017.11.06	Perez 1	\$86.00	L. Timothy Fisher - Mileage, Bridge Toll
2017.11.06	Perez 1	\$36.72	L. Timothy Fisher - Mileage
2018.01.10	Perez 1	\$7.75	Lyft
2018.01.30	Perez 1	\$14.00	City Center West
2018.02.23	Perez 1	\$17.44	L. Timothy Fisher- Expenses
2018.03.16	Perez 1	\$8.00	Parking
2018.08.27	Perez 1	\$8.00	Oakland Parking Meter
2018.09.05	Perez 1	\$40.67	Chevron
2018.09.28	Perez 1	\$2.00	Walnut Creek Parking
2018.11.30	Perez 1	\$1,051.16	SouthWest
2018.12.05	Perez 1	\$40.45	Lyft
2018.12.06	Perez 1	\$8.65	Lyft
2018.12.06	Perez 1	\$19.54	Lyft
2018.12.06	Perez 1	\$468.57	Hilton Garden Inn
2018.12.07	Perez 1	\$8.65	Lyft
2018.12.08	Perez 1	\$35.41	Lyft
2018.12.12	Perez 1	\$9.12	Lyft
2018.12.12	Perez 1	\$11.00	Bart
2018.12.12	Perez 1	\$30.00	Ace Parking
2018.12.17	Perez 1	\$4.00	Oakland Park Meter
2018.12.17	Perez 1	\$8.99	AA Inflight
2018.12.18	Perez 1	\$30.00	Ace Parking
2019.03.15	Perez 1	\$1,348.30	JetBlue - Hearing on Dauberts
2019.03.15	Perez 1	\$848.30	Alaskan Air - Hearing on Dauberts
2019.03.18	Perez 1	\$2,319.10	Hotel - Hearing on Dauberts
2019.03.19	Perez 1	\$18.00	City Center West Garage
2019.03.19	Perez 1	\$8.80	Lyft

2019.03.19	Perez 1	\$8.80	Lyft
2019.03.20	Perez 1	\$49.23	Uber - Hearing on Dauberts
2019.03.22	Perez 1	\$698.30	Alaskan Air - 3/29 Pretrial Conference
2019.03.22	Perez 1	\$898.30	Alaskan Air - 3/29 Pretrial Conference
2019.03.23	Perez 1	\$53.90	Travel Guard - 3/29 Pretrial Conference
2019.03.28	Perez 1	\$75.63	Uber - 3/29 Pretrial Conference
2019.03.28	Perez 1	\$39.32	Uber - 3/29 Pretrial Conference
2019.03.28	Perez 1	\$58.50	Car Service - 3/29 Pretrial Conference
2019.03.29	Perez 1	\$33.16	Uber - 3/29 Pretrial Conference
2019.03.29	Perez 1	\$30.00	City Center West Garage
2019.03.30	Perez 1	\$30.35	Uber - 3/29 Pretrial Conference
2019.03.30	Perez 1	\$1,063.52	Hotel - 3/29 Pretrial Conference
2019.04.02	Perez 1	\$1,355.75	JetBlue - 4/29 Pretrial Conference
2019.04.10	Perez 1	\$8.00	SWA Inflight
2019.04.11	Perez 1	\$19.14	L. Timothy Fisher- Expenses
2019.04.18	Perez 1	\$645.19	API Global Transportat
2019.04.26	Perez 1	\$1,555.75	JetBlue - 4/29 Pretrial Conference
2019.04.27	Perez 1	\$185.99	Travel Guard - 4/29 Pretrial Conference
2019.04.28	Perez 1	\$61.80	Car Service - 4/29 Pretrial Conference
2019.04.28	Perez 1	\$15.00	Impark
2019.04.29	Perez 1	\$5.00	Bart Clipper
2019.04.29	Perez 1	\$20.00	City Center West Garage
2019.04.30	Perez 1	\$33.86	Uber - 4/29 Pretrial Conference
2019.04.30	Perez 1	\$13,463.98	Hotel - Trial
2019.04.30	Perez 1	\$18.56	Lyft
2019.05.01	Perez 1	\$955.75	JetBlue - Trial
2019.05.01	Perez 1	\$5.00	Bart Clipper
2019.05.01	Perez 1	\$6.80	Lyft
2019.05.01	Perez 1	\$8.00	Bart Clipper
2019.05.03	Perez 1	\$8.00	Bart Clipper
2019.05.04	Perez 1	\$66.86	Uber - Trial
2019.05.04	Perez 1	\$52.90	Cab Service - Trial
2019.05.04	Perez 1	\$77.12	Uber - Trial
2019.05.04	Perez 1	\$14.05	Lyft
2019.05.05	Perez 1	\$57.75	Guru Cab Serv
2019.05.05	Perez 1	\$22.02	Oakland Marriot
2019.05.05	Perez 1	\$40.40	Taxi Svc
2019.05.05	Perez 1	\$107.21	Yeremey Krivoshey - Mileage and tolls
2019.05.06	Perez 1	\$35.00	Convention Center Oak
2019.05.06	Perez 1	\$1.50	City of Alamedda IPS
2019.05.06	Perez 1	\$20.00	City Center West Garage
2019.05.06	Perez 1	\$21.39	Oakland Marriot
2019.05.06	Perez 1	\$645.19	API Global Transportat
2019.05.07	Perez 1	\$20.00	City Center West Garage
2019.05.07	Perez 1	\$55.00	Parking Concepts
2019.05.07	Perez 1	\$211.73	API Global Transportat
2019.05.07	Perez 1	\$950.00	Parking Concepts
2019.05.07	Perez 1	\$111.96	Oakland Marriot
2019.05.08	Perez 1	\$20.00	City Center West Garage
2019.05.08	Perez 1	\$52.92	API Global Transportat
2019.05.09	Perez 1	\$20.00	City Center West Garage
2019.05.10	Perez 1	\$16.00	Bart-Walnut Creek
2019.05.10	Perez 1	\$20.00	City Center West Garag Oak

2019.05.10	Perez 1	\$3.00	Parksmart
2019.05.10	Perez 1	\$20.00	City Center West Garage
2019.05.10	Perez 1	\$322.57	Hotel
2019.05.13	Perez 1	\$38.23	Uber - Trial
2019.05.13	Perez 1	\$70.80	Car Service - Trial
2019.05.13	Perez 1	\$902.00	JetBlue - Trial
2019.05.13	Perez 1	\$1.00	LAZ Parking
2019.05.13	Perez 1	\$20.00	City Center West Garag Oak
2019.05.13	Perez 1	\$2.75	Port JLS Parking
2019.05.13	Perez 1	\$3.00	Parksmart
2019.05.13	Perez 1	\$20.00	City Center West Garage
2019.05.13	Perez 1	\$2.25	Port JLS Parking
2019.05.14	Perez 1	\$215.69	L. Timothy Fisher- Mileage for trial
2019.05.15	Perez 1	\$141.30	Blair Reed- Uber travel for Trial
2019.05.15	Perez 1	\$652.15	Yeremey Krivoshey - Trial related expenses
2019.05.18	Perez 1	\$95.00	Parking Concepts
2019.05.31	Perez 1	\$27.41	Chevron
2019.05.31	Perez 1	\$94.57	Yeremey Krivoshey - Mileage and tolls
2019.06.07	Perez 1	\$1,355.75	Jetblue - Settlement Conference
2019.06.07	Perez 1	\$1,048.25	Jetblue - Settlement Conference
2019.06.07	Perez 1	\$1,317.31	Hotel - Settlement Conference
2019.06.08	Perez 1	\$70.76	Travel Guard - Settlement Conference
2019.06.11	Perez 1	\$78.47	Uber - Settlement Conference
2019.06.12	Perez 1	\$21.00	UC Hastings Parking
2019.06.25	Perez 1	\$33.90	Lyft
2019.06.25	Perez 1	\$5.00	Clipper Service
2019.06.26	Perez 1	\$7.30	Lyft
2019.10.10	Perez 1	\$898.61	American - Hearing re Notice Plan, Motion to Amend Judgment
2019.10.23	Perez 1	\$1,375.09	JetBlue - Hearing re Notice Plan, Motion to Amend Judgment
2019.11.18	Perez 1	\$1,139.77	Hotel - Hearing re Notice Plan, Motion to Amend Judgment
2019.11.18	Perez 1	\$16.00	City Center West Garage
2020.02.21	Perez 1	\$2,851.90	Hotel - Hearing re Fees, Mot. to Vacate, MTDs
2020.01.30	Perez 1	\$948.40	JetBlue - Hearing re Fees, Mot. to Vacate, MTDs
2020.01.31	Perez 1	\$948.40	JetBlue - Hearing re Fees, Mot. to Vacate, MTDs
2020.02.26	Perez 1	\$24.00	City Center West Garage
2020.02.26	Perez 1	\$58.36	Lyft (LTF)
2020.02.27	Perez 1	\$31.96	Lyft (BSS)
		<b>\$45,954.84</b>	<b>Total Travel &amp; Lodging Expenses</b>