

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF KING

DOUGLAS PROUDLOVE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SEED CONSULTING, LLC, doing business as,
SEED CAPITAL, CORP., ERIK GANTZ, KEVIN
TUSSY, and DOES 1-10,

Defendants.

NO. 20-2-09220-7 SEA

**DECLARATION OF PAUL ARONS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS AND SERVICE
AWARD**

I, Paul Arons, declare as follows:

1. I am one of the attorneys of record for Plaintiff Douglas Proudlove and I am making this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs and Service Awards.

2. My involvement in this dispute began in early 2020 when I was contacted by Karen Phillips, an attorney with Northwest Justice Project. She was representing Douglas Proudlove in connection with credit card collection actions against him arising from the credit cards he had obtained through Seed Capital to pay for education and training he was supposed to have received in buying and selling real estate. Ms. Phillips explained that although she

DECLARATION OF PAUL ARONS IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARD

1 could represent him to defend collection actions, that he was interested in pursuing the
2 companies that had left him with debts he could not pay, for worthless “education.” After
3 several communications with Ms. Phillips, some preliminary research and speaking with Mr.
4 Proudlove, I agreed to represent him in a class action and began recording my time. In
5 representing Mr. Proudlove, I explained to him that I would be associating with other law
6 offices and with his permission, Terrell Marshall Law Group and Samuel Leonard associated as
7 co-counsel. Sam Leonard and the lawyers at Terrell Marshall are all experienced class counsel
8 with whom I had previously worked.

9 3. In the course of representing Mr. Proudlove and the class for more than two
10 years, I recorded 534.15 hours of time, which are set forth in my contemporaneous time
11 records, attached to this declaration as Exhibit 1. In the exercise of billing judgment, I do not
12 record time for minor tasks, such as scheduling, or reviewing short emails where I am not
13 required to respond. If I think that I had taken too much time on a task, such as reviewing or
14 drafting a filing, I reduce the time that I record accordingly. In the course of prosecuting this
15 action, I have spoken with 20-30 class members, but unless the class member was someone we
16 disclosed in the litigation, in Exhibit 1 I have substituted their initials for their full names. I also
17 redacted, as confidential attorney work product, the names of non-class member sources who I
18 spoke with in this case. Finally, in connection with fees awarded against Defendants as a
19 sanction, this Court adjudicated the reasonableness of 39.70 hours incurred in obtaining a
20 sanctions order. Defendants have paid this award separately and I have therefore deducted
21 39.70 hours from the total hours that I incurred. I also spent \$785.36 in travel and copy costs
22 on this case, set forth in my expense report, attached to this declaration as Exhibit 2.

23 4. This case involved difficult issues and difficult defendants. Defendants were in
24 the business of obtaining credit cards for consumers by “credit card stacking.” This is the
25 practice of obtaining multiple credit cards by simultaneously submitting multiple credit card
26 applications. This is essentially a fraud on the credit card issuers, none of whom know that the

1 applicant has 6 or 7 other pending credit card applications. However, it is not explicitly illegal.
2 In this case, however, Seed Capital was partnered with essentially scam ventures in which
3 consumers were persuaded to pay tens of thousands of dollars for worthless get rich quick
4 schemes (e.g., flipping houses, day trading stocks, internet sales, etc.), and then referred to
5 Seed Capital to get credit cards to pay for the worthless “education.” The predictable result
6 was that desperate consumers were left deeply in debt that they either defaulted on, spent
7 years paying off, or resolved by petitioning for bankruptcy. By early 2021, the Federal Trade
8 Commission had sued or put out of business, both Seed Capital, and most of the companies
9 with which they had partnered. The FTC actions, however, did not relieve Seed’s victims of
10 their credit card debts.

11 5. Plaintiff brought this case under the Washington Credit Services Organization
12 Act, RCW 19.134 (CSOA) and the Consumer Protection Act, RCW 19.86. There is almost no
13 Washington case law under the CSOA, and I found no record of successful litigation against
14 companies like Seed Capital, that participated in fleecing unwitting consumer victims with
15 credit card stacking. Defendants resisted at every step of the way, thereby requiring Plaintiff’s
16 counsel to incur substantial time. When Seed Capital was the only defendant, it moved to have
17 the case dismissed on personal jurisdiction grounds. When that was unsuccessful, it moved for
18 discretionary review, and then dropped the motion. At the same time, it refused to provide full
19 discovery and then violated the concomitant discovery order, essentially dropping out of the
20 litigation and ultimately dissolving as a company.

21 6. After Plaintiff successfully moved for leave to amend the complaint to add Seed’s
22 principals, Erik Gantz and Kevin Tussy, as defendants, the new defendants moved to dismiss on
23 the same ground, with the same result. That set the stage for a months’ long fight over
24 discovery from Gantz and Tussy, ultimately culminating in this Court granting Plaintiff’s motion
25 under CR 37(b)(2) and awarding Plaintiff attorney’s fees and costs. Even then, Plaintiff had to
26 battle with Defendants to get complete QuickBooks records and, on the eve of trial in this case,

27 DECLARATION OF PAUL ARONS IN SUPPORT OF PLAINTIFF’S
MOTION FOR ATTORNEYS’ FEES, COSTS AND SERVICE AWARD

- 3

CASE NO. 20-2-09220-7 SEA

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

1 obtained credit card records from American Express showing that, at best, Defendants had
2 been disingenuous in responding to discovery on alter ego issues.

3 7. In all, Plaintiff either filed, or responded to, seven discovery motions in this case,
4 and prevailed in every motion that was decided. (In connection with a motion filed to force
5 American Express to turn over credit card statements, American Express voluntarily complied
6 before the motion was decided.) Outside of discovery, Plaintiff filed a successful motion for
7 class certification and a partially successful motion for summary judgment and successfully
8 resisted Defendants' multiple motions to dismiss, stay or otherwise derail the litigation.

9 8. Mr. Proudlove has suffered from debilitating health issues throughout this
10 litigation but has nonetheless fully participated in trying to achieve justice for Seed's
11 Washington victims. From the beginning, Mr. Proudlove and I have spent hours communicating
12 to discuss his claims, the factual allegations in the complaint and case developments. He
13 carefully went through his records and provided me with the dozens of documents needed to
14 understand and prosecute this case. He submitted declarations in support of motions filed in
15 this action. Sub. Nos. 28, 155. He also spent more than seven hours preparing for his deposition
16 with counsel and sat for a half day deposition. This was arduous for Mr. Proudlove because of
17 his health issues and during deposition preparation and the deposition itself, Mr. Proudlove had
18 to take breaks because he was having difficulty breathing. Despite his own personal health
19 issues, and the concomitant stress, Mr. Proudlove put the interests of the class ahead of his
20 own personal interests, rejecting individual offers of settlement as high as \$55,000 so that he
21 could continue to pursue claims on behalf of the class members.

22 9. The reasonable rate for my services for litigation filed in King County is \$550 per
23 hour. I have substantial legal experience going back over forty years. This includes extensive
24 experience representing plaintiffs in class actions, under the Fair Debt Collection Practices Act
25 and related state laws, but also in challenging a number of predatory practices targeting
26 tenants and consumers.

27 DECLARATION OF PAUL ARONS IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARD

- 4

CASE NO. 20-2-09220-7 SEA

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

1 10. I graduated from Golden Gate University School of Law in 1978, where I was a
2 law review writer and editor. While in school, I was a law clerk for two years in the impact
3 litigation unit of the San Francisco Neighborhood Legal Assistance Foundation. While employed
4 at the San Francisco Neighborhood Legal Assistance Foundation, I assisted on several class
5 actions successfully challenging different aspects of the California Welfare Reform Act of 1969.

6 11. After graduation, I began work as an associate at the law office of Gladstein &
7 Gladstein in San Francisco. In 1981, I became a partner in the office of Gladstein & Arons, which
8 later became Gladstein, Benjamin & Arons, which, in 1986, became the Law Offices of Paul
9 Arons. Initially I focused on labor and employment law, representing plaintiffs in a wide variety
10 of employment disputes, including those concerning, race, sex and age discrimination and wage
11 payment. I represented individuals and labor unions on employment matters in private labor
12 arbitrations, in administrative proceedings before the California Department of Fair
13 Employment and Housing, the United States Equal Employment Opportunity Commission, the
14 United States Department of Labor, the California Department of Industrial Relations, the
15 National Labor Relations Board, and the California Unemployment Insurance Appeals Board, in
16 hearings and jury trials in the California Superior Court and the United States District Court, and
17 in appeals before the California Court of Appeals and Ninth Circuit Court of Appeals. Beginning
18 in 1985, I co counseled class actions pursued in both federal and state court.

19 12. Since approximately 1993 much of my law practice has been focused on
20 consumer class actions filed under the Fair Debt Collection Practices Act, focusing especially on
21 the area of check collection. Notable cases include that I co-counseled include *Newman v.*
22 *Checkrite California, Inc.*, Civ. No. 93-1557 LKK (E.D. Cal.), a seminal case in the area of FDCPA
23 litigation against check collectors, in which a \$4.3 million settlement fund was created. The
24 published summary judgment decision in that case, *Newman v. Checkrite California, Inc.*, 912 F.
25 Supp. 1354 (E.D. Cal. 1995) has been cited in over one hundred federal court decisions. I have
26 also represented plaintiffs in a number of other class actions filed pursuant to the FDCPA.

27 DECLARATION OF PAUL ARONS IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARD

- 5

CASE NO. 20-2-09220-7 SEA

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

1 *Ballard v. Equifax Check Servs., Inc.*, Civ. No. S-96-1532 FCD (E.D. Cal., filed 8/26/96), a case that
2 involved almost 1,500,000 class members, settled for approximately \$8,000,000. There are
3 three published opinions arising from this lawsuit. *Ballard v. Equifax Check Servs., Inc.*, 27 F.
4 Supp. 2d 1201(E.D. Cal. 1998) [granting summary judgment for the individual plaintiff], *Ballard*
5 *v. Equifax Check Servs., Inc.*, 186 F.R.D. 589 (E.D. Cal. 1999) [granting class certification], and
6 *Ballard v. Equifax Check Servs., Inc.*, 158 F. Supp. 2d 1163 (E.D. Cal. 2001) [granting classwide
7 summary judgment on liability issues. *Irwin v. Mascott*, Civ. No. 97-4737 JL (E.D. Cal., filed
8 12/31/97), was an FDCPA class action that involved approximately 600,000 class members and
9 settled for more than a million dollars. There are four published decisions in that case, *Irwin v.*
10 *Mascott*, 96 F. Supp. 2d 968 (N.D. Cal. 1999) [granting class certification], *Irwin v. Mascott*, 94 F.
11 Supp. 2d 1052 (N.D. Cal. 2000) [denying defendants' motion to add third-party defendants],
12 *Irwin v. Mascott*, 112 F. Supp. 2d 937 (N.D. Cal. 2000) [granting summary judgment and issuing
13 permanent injunction], and *Irwin v. Mascott*, 370 F.3d 924 (9th Cir. 2004) [affirming contempt
14 order against defendants]. I co-counseled *Hunt v. Check Recovery Sys.*, 241 F.R.D. 505 (N.D. Cal.
15 2007), an FDCPA class action involving unlawful check collection charges. Plaintiffs prevailed on
16 summary judgment. *Hunt v. Check Recovery Sys.* 178 F. Supp. 2d 1157 (N.D. Cal. 2007).
17 Defendant appealed that decision to the Ninth Circuit, which referred the case to the California
18 Supreme Court, to decide the state law issue of whether a debt collector may seek both a
19 statutory service charge, and prejudgment interest on a dishonored check. I argued the issue
20 before the California Supreme Court, which ruled for plaintiffs and against the debt collector.
21 *Imperial Merchant Servs., Inc. v. Hunt*, 47 Cal. 4th 381 (Cal. 2009), [97 Cal. Rptr. 3d 464]. In an
22 interlocutory appeal in the same case, I succeeded in obtaining the first federal appellate court
23 ruling that a district court has discretion to shift class notice costs to defendants, once liability
24 has been established. *Hunt v. Imperial Merchant Servs., Inc.*, 560 F.3d 1137 (9th Cir. Cal. 2009).
25 Since beginning to practice in Washington in 2014 I have co-counseled successful individual and
26 class action cases on behalf of consumers, including

27 DECLARATION OF PAUL ARONS IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARD

- 6

CASE NO. 20-2-09220-7 SEA

TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

1 13. Since becoming licensed to practice law in the State of Washington in
2 2014, I have represented Washington consumers in successful class actions against debt
3 collectors including in *Cavnar v. Bounceback*, 2:14-CV-235-RMP (E.D. WA) and *Dibb v.*
4 *Allianceone Receivables Mgmt.*, No. 14-5835 RJB (W.D. Wash.), a class action, in which we were
5 able to negotiate a settlement providing almost \$2,000,000 in direct payments and debt relief
6 to class members. In a case like this one, involving post-move out charges imposed by a
7 property management company, *Jammeh v. HNN Associates, et al.*, 2:19-cv-00620 (W.D. Wash),
8 we obtained both prospective relief for a class of tenants, and \$1,600,000 in monetary relief. I
9 have been plaintiff's counsel in a number of other class action lawsuits and I have been
10 continually involved in class action litigation since 1993. A LEXIS search shows over 100 federal
11 district and appellate court decisions in cases where I was either lead, or co-lead counsel.

12 14. In approximately 2003, I was honored by the Impact Fund for my work in
13 *Newman v. Checkrite*. In 2006, I received a Consumer Advocate of the Year award from the
14 National Association of Consumer Advocates. I have participated in presentations at the
15 conferences of the National Consumer Law Center, the National Association of Consumer
16 Advocates and the Northwest Consumer Law Center.

17 I declare under penalty of perjury under the law of Washington and the United States of
18 America that the foregoing is true to the best of my knowledge, that if called as a witness I
19 could competently testify thereto, and that this declaration is executed in Friday Harbor,
20 Washington, on this 17th day of November, 2022.

21
22 By: /s/ Paul Arons
23 Paul Arons, WSBA #47599
24
25
26
27

- Exhibit 1 -

Law Office of Paul Arons - Time Entry

Date	Description	Total Time	Total Fees @\$550/hr.
Proudlove v Seed Capital			
04/13/2020	Phone call with Karen Phillips re: Doug Proudlove	0.40	\$ 220.00
04/13/2020	Research re: Doug Proudlove state and federal law claims v. Seed Capital/internet searches re: Seed Capital	1.30	\$ 715.00
04/15/2020	Phone call with Bob Murphy and Kat Hyland re: Seed Capital and James v. Seed	0.70	\$ 385.00
04/17/2020	Draft interim retainer agreement and cover letter to Doug Proudlove	0.50	\$ 275.00
04/17/2020	Research enforceability of forum selection clause in Washington courts.	1.20	\$ 660.00
04/17/2020	Phone call with Karen Phillips and Doug Proudlove	0.70	\$ 385.00
04/19/2020	Phone call with Sam Leonard re: potential claims	0.50	\$ 275.00
04/20/2020	Emails with Karen Philips re: Doug Proudlove	0.20	\$ 110.00
04/20/2020	Review discovery in collection cases against Dough Proudlove	0.30	\$ 165.00
04/20/2020	Emails with Bob Murphy re: representing Doug Proudlove	0.20	\$ 110.00
04/24/2020	Phone call with Doug Proudlove, Sarah Proudlove, Karen Phillips re: proceeding with class action against Seed Capital.	0.60	\$ 330.00
04/27/2020	Review credit and collection documents from client	1.00	\$ 550.00
04/27/2020	Phone call with Karen Phillips re: current status of client's collection/litigation matters	0.50	\$ 275.00
04/28/2020	Phone call with Sam Leonard to discuss case strategy and tactics	0.60	\$ 330.00
04/29/2020	Dictate notes of phone call with Sarah Stout (daughter)	0.20	\$ 110.00
04/29/2020	Telephone call w/Sarah Stout re: Response/Seed Capital	0.70	\$ 385.00
04/29/2020	Telephone call w/Sarah Stout re: Response/Seed Capital	0.70	\$ 385.00
04/29/2020	Phone call with Sarah Stout (daughter)	0.40	\$ 220.00
04/30/2020	Review and organize client credit card and collection agency documents	1.00	\$ 550.00
05/01/2020	Telephone call w/client;	0.20	\$ 110.00

05/04/2020	Review and organize Doug Proudlove credit card statements, collection letters and contracts	1.00		\$	550.00
05/06/2020	Phone call with Beth Terrell re: strategy for class lawsuit vs. Seed Capital	0.50		\$	275.00
05/07/2020	Email to co-counsel re: progress on drafting of complaint	0.10		\$	55.00
05/07/2020	Review "priority of action" cases and send email to Sam Leonard and Beth Terrell re: filing a complaint	0.30		\$	165.00
05/07/2020	Phone call with Beth Terrell and Sam Leonard re: filing issues	0.40		\$	220.00
05/07/2020	Continued drafting of complaint (complete facts and write CSOA violations)	1.80		\$	990.00
05/08/2020	Email to client re: complaint facts	0.10		\$	55.00
05/08/2020	Second phone call with client re: complaint facts	0.10		\$	55.00
05/08/2020	Research and draft complaint, including review of all facts and documents, review of RXW 19.16, and internet research re: similar schemes.	6.00		\$	3,300.00
05/08/2020	Phone call with client re: complaint facts	0.30		\$	165.00
05/09/2020	Phone call with client re: facts in the complaint	0.10		\$	55.00
05/09/2020	Continue research and drafting complaint/revise fact section and start legal section	2.20		\$	1,210.00
05/10/2020	Email initial draft of complaint with discussion of issues	0.10		\$	55.00
05/10/2020	Complete initial draft of complaint/research and draft CPA claims and prayer for relief	2.30		\$	1,265.00
05/11/2020	Draft letter to Response re: settlement	0.40		\$	220.00
05/13/2020	Research Credit Services Organization Act in other jurisdictions.	1.40		\$	770.00
05/13/2020	Phone call with Sam Leonard to discuss revisions to complaint.	0.50		\$	275.00
05/13/2020	Review and respond to Sam Leonard edits and comments on initial draft of complaint.	0.90		\$	495.00
05/13/2020	Review and respond to Sam Leonard email re: revisions to draft complaint.	0.40		\$	220.00
05/13/2020	Email to Sam Leonard and Beth Terrell re my edits and comments on initial draft of complaint.	0.10		\$	55.00
05/14/2020	Review credit card data and create spreadsheet showing interest rates and payments	0.70		\$	385.00
05/14/2020	Review and comment on Sam Leonard revisions to draft complaint and forward to Beth Terrell	0.30		\$	165.00

05/14/2020	Phone call with Sam Leonard and Beth Terrell re: revisions to draft complaint	0.70	\$	385.00
05/14/2020	Revise complaint for streamlining	1.50	\$	825.00
05/14/2020	Email revised complaint to co-counsel with explanation of changes.	0.30	\$	165.00
05/15/2020	Draft minor revisions to complaint based on phone call with client.	0.10	\$	55.00
05/15/2020	Further revisions to draft complaint.	0.40	\$	220.00
05/15/2020	Phone call with client to review complaint	0.90	\$	495.00
05/18/2020	Review and respond to email from Beth Terrell re: revisions to complaint	0.20	\$	110.00
05/18/2020	Review and revise draft after Beth Terrell questions and transmit to co-counsel with lengthy comments.	1.60	\$	880.00
05/20/2020	Review and revise Blythe Chandler re-draft of complaint and send comments and changes to co-counsel.	0.80	\$	440.00
05/21/2020	Review and comment on Sam Leonard revisions to complaint	0.30	\$	165.00
05/21/2020	Phone call with Doug Proudlove to discuss factual allegations in complaint.	0.40	\$	220.00
05/21/2020	Review and add comments to final draft of complaint.	0.60	\$	330.00
05/22/2020	Draft authorizations to credit card companies and cover letter	0.30	\$	165.00
05/25/2020	Initial draft of document production request	1.30	\$	715.00
05/26/2020	Draft initial interrogatories to Seed Capital	1.00	\$	550.00
06/03/2020	Phone call from Mike Marino (FTC) .	0.20	\$	110.00
06/05/2020	Email to co-counsel re: update on events in lawsuit, including FTC call and getting credit card info.	0.20	\$	110.00
06/10/2020	Review and edit revisions to initial written discovery to Seed Capital	0.30	\$	165.00
06/12/2020	Review Sam Leonard revisions to written discovery to Seed Capital and email to co-counsel with discussion about subpoenas and requests for admissions.	0.10	\$	55.00
06/15/2020	Draft memo re serving the credit card issuers with subpoenas, including the subpoena document requests	0.70	\$	385.00
06/16/2020	Draft Exhibit A for subpoenas to credit card issuers and email to Blythe Chandler with instructions	0.80	\$	440.00
06/16/2020	Review and respond to email from Blythe Chandler re: subpoenas to credit card issuers	0.10	\$	55.00
06/18/2020	Review and respond to email from Blythe Chandler re: credit card issuer subpoenas.	0.10	\$	55.00

06/26/2020	Initial draft of First Request for Admissions to Seed Capital	1.10	\$	605.00
07/01/2020	Review June 30, 2020 letters to credit card companies and draft proposed response to send to co-counsel for review.	0.20	\$	110.00
07/01/2020	Research re: forum selection and choice of law	1.00	\$	550.00
07/02/2020	Phone call with Donna Carson (JM Chase) re: document subpoena	0.20	\$	110.00
07/09/2020	Review and revise draft 2 of Request for Admissions to Seed Capital	0.20	\$	110.00
07/13/2020	Email co-counsel and client re: records from Barclay's Bank, and research IP address and email address used in application	0.10	\$	55.00
07/13/2020	Review and respond to email from Citibank re: subpoena.	0.10	\$	55.00
07/13/2020	Phone call with Margaret Matavich (CapitalOne) re: subpoena	0.20	\$	110.00
07/13/2020	Email to Margaret Matavich (CapitalOne) re: subpoena, attaching copy of complaint	0.10	\$	55.00
07/13/2020	Review records from Barclay's Bank, and research IP address and email address used in application	0.30	\$	165.00
07/13/2020	Email Barclay's Bank re: subpoena response, requesting to schedule a phone call	0.10	\$	55.00
07/14/2020	Review and approve Blythe Chandler edits to Requests for Admissions to be served on Seed.	0.10	\$	55.00
07/14/2020	Review email from Mike Coverdale (Barclays) and respond with questions about completeness of document production.	0.40	\$	220.00
07/16/2020	Review and respond to emails re: defendant's request to stay discovery.	0.10	\$	55.00
07/16/2020	Phone call from client responding to my email and to discuss case matters	0.10	\$	55.00
07/16/2020	Review email from Margaret Matavich (Capital One) re subpoena and Seed Capital objections, research standing of non-subpoenaed party to object or quash and send responding email.	0.80	\$	440.00
07/17/2020	Email to Jacob Morse (Barclays) confirming this morning's phone call and his agreement to search for additional documents.	0.10	\$	55.00
07/17/2020	Email to Blythe Chandler, cc. Sam Leonard, re: credit card company subpoena status	0.10	\$	55.00
07/17/2020	Phone call with Jacob Morse re: subpoena to Barclay's Bank	0.20	\$	110.00
07/20/2020	Review and respond to email from Maggie Pruitt (Capital One) re: extension of time to respond to document subpoena	0.10	\$	55.00

07/20/2020	Review and respond to email from Bank of America re: further information for Seed Capital and other entities.	0.10	\$	55.00
07/20/2020	Review and respond to second email from Erin at Bank of America re: further information for Seed Capital and other entities.	0.10	\$	55.00
07/20/2020	Review Citibank objections to document subpoena and email response to Andrew Moritz (Citibank).	0.30	\$	165.00
07/20/2020	Phone call with Andrew Moritz re: Citibank response to document subpoena	0.30	\$	165.00
07/21/2020	Review and respond to email from Sam Leonard re: Chase credit card records and client email address	0.10	\$	55.00
07/22/2020	Phone call with Blythe Chandler re: stay of discovery	0.10	\$	55.00
07/22/2020	Phone call with Mike Sanders and Blythe Chandler re: motion to dismiss and stay of discovery.	0.20	\$	110.00
07/23/2020	Review discovery served on Seed Capital, list discovery requests on which we might be willing to defer, and email cocounsel with list and comments.	0.40	\$	220.00
07/23/2020	Email to Mike Sanders re: deferring Seed Capital response to discovery	0.30	\$	165.00
07/28/2020	Emails with Blythe Chandler re: getting subpoena to Google	0.10	\$	55.00
07/28/2020	Emails with Sam Leonard re: getting subpoena to Google	0.10	\$	55.00
07/28/2020	Phone call with Sam Leonard re: douglasproudlove.com email address	0.20	\$	110.00
07/28/2020	Review documents produced by Discover	0.20	\$	110.00
07/28/2020	Review email from Mike Sanders re: limiting discovery responses and send comments and proposal to co-counsel	0.40	\$	220.00
07/30/2020	Email to Mike Sanders re: following up on Request for Production No. 18	0.10	\$	55.00
08/04/2020	Review CD and cover letter from Citibank, attempt to retrieve documents from CD and email Kevin Geiger (Citi) re: problems	0.40	\$	220.00
08/05/2020	Email to co-counsel summarizing progress on credit card subpoenas	0.20	\$	110.00
08/05/2020	Review Citibank documents and forward to co-counsel	0.20	\$	110.00
08/06/2020	Email to Kevin Geiger re: incomplete response to subpoena	0.20	\$	110.00
08/06/2020	Review status of post-production discussion re: additional documents and email Jacob Morse (Barclays)	0.20	\$	110.00
08/06/2020	Email to Margaret Matavich (Cap1) re: incomplete response to subpoena	0.30	\$	165.00

08/07/2020	Initial review of Seed Capital Motion to Dismiss and email comments to co-counsel	0.40	\$	220.00
08/07/2020	Initial review of discovery responses served by Seed Capital	1.60	\$	880.00
08/10/2020	Research notaries attending Seed Capital events and research what records notaries are required to keep.	0.40	\$	220.00
08/10/2020	Email to co-counsel re: next steps to take in the litigation, including discovery, investigation and Motion to Dismiss opposition.	0.20	\$	110.00
08/10/2020	Detailed review of Seed Capital discovery responses	0.30	\$	165.00
08/10/2020	Email Sarah Stout re: Seed Capital signing	0.10	\$	55.00
08/10/2020	Detailed review of discovery responses and drafting meet and confer letter to circulate to co-counsel for editing.	1.40	\$	770.00
08/11/2020	Conference call with Sam Leonard, Jessica Langsted and Blythe Chandler re: discovery and response to motion to dismiss	0.50	\$	275.00
08/12/2020	Research mandatory vs. permissive forum selection clauses and send email to co-counsel with attached cases	1.40	\$	770.00
08/12/2020	Draft subpoena to be served on notaries Shonta Riles and Michelle Moroles, and forward to co-counsel with comments.	0.80	\$	440.00
08/13/2020	Phone call from client in response to my email	0.10	\$	55.00
08/13/2020	Review Seed Capital response to Requests for Admissions	0.10	\$	55.00
08/13/2020	Speak with client about emails and arrange to have doc. printed and picked up in Burlington	0.20	\$	110.00
08/13/2020	Tel. call with Sarah Stout re: Seed Capital agreement signing	0.30	\$	165.00
08/14/2020	Email to Jordan Jones, atty., re: Amanda McKern and Seed Consulting	0.10	\$	55.00
08/14/2020	Phone call with client re: case status	0.20	\$	110.00
08/14/2020	Conference call with Mike Sanders and Sam Leonard re: meeting and conferring on Seed Capital responses to First Set of Interrogatories and Requests for Production of Documents	0.90	\$	495.00
08/14/2020	Call with Sam Leonard re: conference call with Mike Sanders and Sam Leonard re: meeting and conferring on Seed Capital responses to First Set of Interrogatories and Requests for Production of Documents/discussion of further action to take	0.10	\$	55.00
08/14/2020	Draft letter to Mike Sanders confirming results of discovery conference	0.90	\$	495.00

08/18/2020	Email to Mike Sanders re: douglasproudlove.com email address password	0.10	\$	55.00
08/18/2020	Phone call with Andrew Moritz (Citicard) re: subpoena response	0.50	\$	275.00
08/19/2020	Review and respond to emails from Sam Leonard re: Seed Capital tie in on Response web site	0.10	\$	55.00
08/19/2020	Review and respond to emails with Blythe Chandlers re: declaration of Doug Proudlove and Sarah Stout in opposition to motion to dismiss..	0.20	\$	110.00
08/19/2020	Review and edit Blythe Chandler revisions to Sarah Stout declaration and transmit to Sarah Stout with explanatory email.	0.30	\$	165.00
08/19/2020	Research psychology of real estate scams in preparation for drafting declaration of Douglas Proudlove in opposition to motion to dismiss..	0.50	\$	275.00
08/19/2020	Draft declaration of Douglas Proudlove in opposition to motion to dismiss..	0.90	\$	495.00
08/19/2020	Review file notes and draft declaration of Sarah Stout in opposition to motion to dismiss..	0.60	\$	330.00
08/19/2020	Phone call with client re: declaration of Douglas Proudlove in opposition to motion to dismiss..	0.40	\$	220.00
08/20/2020	Phone call with John McKern re: his experiences with Seed Capital and Snap Flip.	0.40	\$	220.00
08/20/2020	Phone call with Jordan Jones (John McKern lawyer) re: Seed Capital	0.10	\$	55.00
08/20/2020	Review and respond to Sam Leonard email re: douglasproudlove@gmail.com	0.20	\$	110.00
08/20/2020	Revise Doug Proudlove declaration and send to Blythe Chandler, with comments	0.30	\$	165.00
08/20/2020	Draft revision to Doug Proudlove declaration and send to co-counsel, with explanation.	0.20	\$	110.00
08/22/2020	Receive and review supplemental production from Citibank	0.20	\$	110.00
08/22/2020	Review and edit Doug Proudlove declaration in opposition to motion to dismiss/call Doug Proudlove	0.20	\$	110.00
08/22/2020	Review and edit Sarah Proudlove declaration in opposition to motion to dismiss/call Sarah Proudlove	0.20	\$	110.00
08/22/2020	Review and revise draft of Proudlove opposition to Seed Capital Motion to Dismiss	2.10	\$	1,155.00
08/24/2020	Review and comment on Sam Leonard edits to opposition to motion to dismiss	0.10	\$	55.00
08/24/2020	Email to co-counsel re: future discovery actions to take	0.10	\$	55.00
08/24/2020	Research corporate connections of Erik Gantz and Kevin Tussy.	1.80	\$	990.00
08/24/2020	Phone call with Doug Proudlove re: declaration and other facts	0.10	\$	55.00

08/24/2020	Review and respond to emails with co-counsel re: edits to opposition to motion to dismiss	0.10		
			\$	55.00
08/25/2020	Email to co-counsel re: discovery dispute re: complaints about Seed Capital	0.10	\$	55.00
08/25/2020	Email to Jordan Jones re: providing emails showing McKern complaint	0.10	\$	55.00
08/31/2020	Review Seed Capital reply memorandum and email comments and questions to co-counsel	0.10		
			\$	55.00
09/03/2020	Moot court prep on motion to dismiss/review all filings, with Blythe Chandler and Beth Terrell	0.40		
			\$	220.00
09/03/2020	Prepare for moot court prep on motion to dismiss/review all filings	0.20	\$	110.00
09/04/2020	Email to Michael Sanders re: deferred discovery now due on September 14, 2020.	0.10	\$	55.00
09/09/2020	Review file and prior discovery responses and draft preliminary discovery plan	1.30	\$	715.00
09/09/2020	Draft proposed letter re: reverse mortgage application	0.20	\$	110.00
09/09/2020	Review and draft proposed response to email from Mike Sanders re: settlement	0.20	\$	110.00
09/10/2020	Locate and download web pages showing available zero interest credit cards	0.20	\$	110.00
09/10/2020	Review and respond to email from Blythe Chandler re: evidence of public availability of credit card offers.	0.20		
			\$	110.00
09/10/2020	Complete preliminary discovery plan and forward to co-counsel, with comments, for review.	0.30		
			\$	165.00
09/10/2020	Draft supplemental discovery requests.	0.80	\$	440.00
09/10/2020	Phone call with client re: case status and future actions	0.20	\$	110.00
09/16/2020	Draft email to Mike Sanders re: failure to provide discovery responses and forward to co-counsel for review	0.30		
			\$	165.00
09/16/2020	Multiple emails with co-counsel re: email to opposing counsel re: overdue discovery responses	0.10		
			\$	55.00
09/16/2020	Tel. call with Michelle Moroles (notary) re: complying with subpoena	0.40	\$	220.00
09/16/2020	Email to Michelle Moroles (notary) re: complying with subpoena	0.10	\$	55.00
09/17/2020	Email to Mike Sanders re: Seed Capital's failure to provide discovery	0.10	\$	55.00
09/19/2020	Initial review of documents produced by Michelle Moroles	0.50	\$	275.00
09/19/2020	Email to Mike Sanders re: Seed Capital's failure to provide discovery	0.10	\$	55.00
09/21/2020	Review notary journal and other docs. produced by Michelle Moroles	1.00	\$	550.00
09/21/2020	Review email from Michelle Moroles (notary) re: complying with subpoena.	0.10	\$	55.00

09/21/2020	Email co-counsel re: email from Michelle Moroles (notary) re: complying with subpoena.	0.10		
			\$	55.00
09/21/2020	Email to co-counsel re: review of Moroles documents and discussion of further investigation/discovery	0.10		
			\$	55.00
09/22/2020	Email to co-counsel re: responding to message from Mike Sanders re: motion to stay discovery pending appeal of denial of motion to dismiss.	0.20		
			\$	110.00
09/22/2020	Meet and confer phone call with Michael Sanders re: motion to compel	0.20		
			\$	110.00
09/22/2020	Listen to phone message from Mike Sanders re: motion to stay discovery pending appeal of denial of motion to dismiss.	0.10		
			\$	55.00
09/22/2020	Emails with Mike Sanders re: meeting and conferring	0.10		
			\$	55.00
09/23/2020	Drafting of motion to compel	1.30		
			\$	715.00
09/24/2020	Complete initial draft of motion to compel discovery	3.00		
			\$	1,650.00
09/25/2020	Email to co-counsel re: revisions to motion to compel	0.10		
			\$	55.00
09/25/2020	Review revisions to motion to compel and make changes.	0.40		
			\$	220.00
09/25/2020	Phone call with client re: Response Marketing settlement	0.30		
			\$	165.00
09/26/2020	Draft request for judicial notice in support of motion to compel	0.20		
			\$	110.00
09/26/2020	Review Sam Leonard revisions, organize exhibits and insert citations	0.50		
			\$	275.00
09/26/2020	Draft declaration of Paul Arons in Support of Motion to Compel Discovery Responses	0.70		
			\$	385.00
09/28/2020	Initial review of Seed Capital Motion to Stay Proceedings, and email to co-counsel re: preparation of opposition.	0.20		
			\$	110.00
09/28/2020	Reviewed Shonta Riles documents from Jessica Langsted and sent email to Jessica re: Riles response	0.10		
			\$	55.00
09/29/2020	Begin drafting opposition to motion to stay proceedings	0.80		
			\$	440.00
09/30/2020	Continued drafting of opposition to motion for stay	0.90		
			\$	495.00
10/01/2020	Complete initial draft of opposition to motion for stay	2.20		
			\$	1,210.00
10/02/2020	Review and revise Blythe Chandler revisions to opposition to motion to stay	0.30		
			\$	165.00
10/02/2020	Quick review of documents produced by Shonta Riles and call to Blythe Chandler to discuss	0.10		
			\$	55.00

10/02/2020	Email to Blythe Chandler and Sam Leonard re:revisions to opposition to motion to stay	0.10		
			\$	55.00
10/05/2020	Review opposition to motion to compel and draft reply	1.00		
			\$	550.00
10/06/2020	Draft minor revisions to reply memo in support of motion to compel discovery	0.10		
			\$	55.00
10/13/2020	Review discovery orders from court and email co-counsel	0.10		
			\$	55.00
10/13/2020	Email to potential witness (SL)	0.20		
			\$	110.00
10/13/2020	Review emails from Seed forwarded by witness SL	0.40		
			\$	220.00
10/13/2020	Email questions re Seed to witness SL	0.10		
			\$	55.00
10/13/2020	Review emails from co-counsel and draft revisions to settlement agreement.	0.40		
			\$	220.00
10/13/2020	Phone call with potential witness (SL)	0.20		
			\$	110.00
10/29/2020	Email to co-counsel re: revisions for First Amended Complaint	0.10		
			\$	55.00
10/29/2020	Review letter from Seed's counsel re poverty, research elements of civil conspiracy and exchange emails with co-counsel re: response.	0.30		
			\$	165.00
10/29/2020	Draft revisions for First Amended Complaint	0.80		
			\$	440.00
10/30/2020	Begin draft of motion for leave to amend	2.00		
			\$	1,100.00
11/02/2020	Email to Blythe Chandler re: Motion for Leave to File Amended Complaint with exhibits and comments	0.20		
			\$	110.00
11/02/2020	Draft declaration in support of Motion for Leave to File Amended Complaint and organize exhibits	0.30		
			\$	165.00
11/02/2020	Complete drafting on Motion for Leave to File Amended Complaint	0.40		
			\$	220.00
11/03/2020	Phone call with Blythe Chandler re: filing motion to amend	0.10		
			\$	55.00
11/04/2020	Email to Blythe Chandler re: service on defendants with Mix Sanders withdrawn.	0.10		
			\$	55.00
11/04/2020	Begin research and drafting motion to compel	0.90		
			\$	495.00
11/05/2020	Draft motion for sanctions for violating discovery order	2.10		
			\$	1,155.00
11/06/2020	Email to co-counsel re: strategy	0.20		
			\$	110.00
11/10/2020	Status phone call with Britt Glass, Blythe Chandler and Sam Leonard	0.25		
			\$	137.50
11/10/2020	Review and make revisions to Motion for Leave to File Amended Complaint, Declaration of Paul Arons and proposed First Amended Complaint.	0.30		
			\$	165.00
12/09/2020	Review settlement offer from Seed and exchange emails with co-counsel	0.20		
			\$	110.00

12/10/2020	Phone call with Sam Leonard and Blythe Chandler re: settlement offer	0.20	\$	110.00
12/16/2020	Phone call with Doug Proudlove and FTC investigator Michael Marino	1.50	\$	825.00
01/11/2021	Review file and email co-counsel re: discovery needed for class cert and other issues.	0.20	\$	110.00
01/11/2021	Phone call with client re: settlement offer and case status	0.20	\$	110.00
01/11/2021	Review and respond to email re: pursuing class cert, with list of issues and discussion of discovery	0.20	\$	110.00
01/11/2021	Phone conference with Blythe Chandler and Sam Leonard re: case strategy and tactics	0.50	\$	275.00
01/14/2021	Revise notary subpoena request template and transmit to Jessica Langsted (TMLG).	0.20	\$	110.00
01/15/2021	Review subpoenas for notaries and cross-check against discovery responses	0.20	\$	110.00
01/18/2021	Preliminary review of evidence in support of class certification motion	0.90	\$	495.00
01/18/2021	Review Seed contracts obtained from Michelle Moroles, notary, and create table. Coordinate with vendor information provided by Seed.	1.10	\$	605.00
01/18/2021	Review Seed contracts obtained from Michelle Moroles, notary, and create table. Coordinate with vendor information provided by Seed.	1.10	\$	605.00
01/21/2021	Begin drafting motion for class certification	1.20	\$	660.00
01/22/2021	Continue drafting motion for class certification	2.00	\$	1,100.00
01/24/2021	Continue drafting motion for class certification	1.50	\$	825.00
01/24/2021	Email to Blythe Chandler re: class certification motion	0.10	\$	55.00
01/25/2021	Continue drafting motion for class certification-draft declaration of Douglas Proudlove	0.40	\$	220.00
01/25/2021	Continue drafting motion for class certification	3.50	\$	1,925.00
01/26/2021	Phone call with Bob Murphy re: status of his lawsuit v. Seed Capital	0.20	\$	110.00
01/26/2021	Complete initial draft of motion for class certification	4.00	\$	2,200.00
01/26/2021	Email to co-counsel re: initial draft of motion for class certification	0.20	\$	110.00
01/26/2021	Phone call with Phoenix McHenry (notary) re: document subpoena	0.10	\$	55.00
01/26/2021	Review and respond to email from Phoenix McHenry (notary) re: questions about document subpoena	0.20	\$	110.00

01/26/2021	Email to co-counsel re: phone call with Bob Murphy re: status of his lawsuit v. Seed Capital	0.10		
			\$	55.00
01/27/2021	Phone call from Lynn Pahl (notary) re: subpoena.	0.20		
			\$	110.00
01/27/2021	Email to Lynn Pahl (notary) re: subpoena.	0.10		
			\$	55.00
01/27/2021	Review and respond to email from Phoenix McHenry re: notary subpoena	0.10		
			\$	55.00
01/27/2021	Review Collin Jayne email about settlement and time extension and send comments to co-counsel	0.20		
			\$	110.00
02/01/2021	Review documents produced by Lynn Pahl (notary) and exchange emails with Jessica Langsted re: subpoena status	0.20		
			\$	110.00
02/02/2021	Review and revise final version of class certification motion	0.40		
			\$	220.00
02/03/2021	Phone call with co-counsel and opposing counsel re: settlement	0.20		
			\$	110.00
02/03/2021	Phone call with co-counsel re: opposing counsel phone call, FTC complaint and how to proceed.	0.40		
			\$	220.00
02/03/2021	Review and annotate FTC Complaint	1.10		
			\$	605.00
02/08/2021	Review documents produced and respond to email from Daniella Borovska (notary) re: subpoena	0.20		
			\$	110.00
02/08/2021	Review and respond to email from Blythe Chandler re: class certification motion.	0.10		
			\$	55.00
02/09/2021	Review email and documents from Judy Ross (notary); respond to Ms. Ross and forward to Jessica Langsted for indexing	0.10		
			\$	55.00
02/09/2021	Phone call with Craig Fite (notary) and email to Mr. Fite confirming our conversation and his agreement to look in other notary journals	0.20		
			\$	110.00
02/11/2021	Draft revisions to class cert. motion to reference FTC lawsuit against Seed Consulting	0.30		
			\$	165.00
02/11/2021	Email to co-counsel re: issue of adding civil conspiracy claim	0.10		
			\$	55.00
02/11/2021	Research and draft new allegations for civil conspiracy claim and to add Randy Lang and transmit to co-counsel	1.10		
			\$	605.00
02/12/2021	Email to co-counsel re: case status and issues re: amending and class cert.	0.30		
			\$	165.00
02/13/2021	Email to co-counsel re: filing motion for leave to amend	0.10		
			\$	55.00
02/13/2021	Email Alicia Levy (atty.) re: subpoena to Agnes Reznik (notary)	0.20		
			\$	110.00
02/13/2021	Review records and email co-counsel re: Kevin Tussy	0.30		
			\$	165.00

02/14/2021	Begin drafting motion for leave to file amended complaint, including close review of FTC v. Seed Consulting	1.90	\$	1,045.00
02/15/2021	Final revisions to draft of second amended complaint	0.40	\$	220.00
02/15/2021	Complete drafting motion for leave to file amended complaint	0.90	\$	495.00
02/15/2021	Review and respond to email from Alicia Levy (atty.) re: subpoena for Agnes Reznik records.	0.30	\$	165.00
02/16/2021	Review Motion to Dismiss filed by Gantz and Tussy and research Fallia case cited in motion	0.30	\$	165.00
02/16/2021	Email co-counsel re: Motion to Dismiss filed by Gantz and Tussy and discuss strategy	0.20	\$	110.00
02/17/2021	Review internet postings and videos re: credit card stacking	1.00	\$	550.00
02/17/2021	Draft revisions to Second Amended Complaint re: personal jurisdiction	0.60	\$	330.00
02/17/2021	Phone call with Sam Leonard and Blythe Chandler re: responding to motion to dismiss, filing motion to amend and case strategy	0.50	\$	275.00
02/23/2021	Draft interrogatories and requests for production for Gantz and Tussy on personal jurisdiction issues, including review relevant case law and FTC v. Seed Consulting	3.50	\$	1,925.00
02/23/2021	Draft requests for admissions for Gantz and Tussy on personal jurisdiction issues, including review relevant case law and FTC v. Seed Consulting	1.00	\$	550.00
02/28/2021	Review documents produced by notaries and email Jessica Langsted re: any missing records and notaries that have not responded.	0.40	\$	220.00
03/01/2021	Email to co-counsel re: case status	0.10	\$	55.00
03/01/2021	Phone call with client re: case status	0.10	\$	55.00
03/10/2021	Review and edit requests for admissions to Gantz and Tussy and interrogatories and doc. requests.	0.40	\$	220.00
04/05/2021	Phone call with Doug Proudlove re: today's \$55,000 settlement offer	0.10	\$	55.00
04/05/2021	Review emails and have telephone call with Blythe Chandler re: today's \$55,000 settlement offer/case strategy	0.10	\$	55.00
04/06/2021	Review emails from opposing counsel and co-counsel, review Gantz real estate holdings, brief review and research of pending motion to dismiss and email comments to co-counsel	1.00	\$	550.00
04/06/2021	Research and draft motion for sanctions for violating discovery order	2.00	\$	1,100.00

04/07/2021	Email to Terry Coffing re: meeting and conferring about Seed's failure to respond to discovery	0.10	\$	55.00
04/12/2021	Email to opposing counsel re: meeting and conferring re: Seed Consulting's violation of discovery order.	0.10	\$	55.00
04/13/2021	Draft motion for default and for sanctions	6.00	\$	3,300.00
04/14/2021	Review email from Collin Jayne re: Gantz/Tully discovery responses, review prior emails regarding discovery and draft proposed response for review by co-counsel.	0.60	\$	330.00
04/14/2021	Complete draft motion for default and for sanctions and forward to co-counsel for review	2.00	\$	1,100.00
04/16/2021	Review Amanda Steiner revisions to motion for sanctions v Seed,	0.90	\$	495.00
04/19/2021	Review and revise Motion for Sanctions/draft declaration in support of Motion for Sanctions/locate and organize exhibits/multiple emails with co-counsel re: revisions to motion/email completed versions to co-counsel	7.50	\$	4,125.00
04/20/2021	Email with Amanda Steiner re: motion to dismiss based on lack of personal jurisdiction	0.20	\$	110.00
04/20/2021	Prepare for and participate in meet and confer phone call with Collin Jayne and Beth Terrell re: deferring discovery	0.20	\$	110.00
04/20/2021	Review and respond to email from Beth Terrell re: motion for sanctions	0.20	\$	110.00
04/20/2021	Draft proposed order for motion for sanctions	0.20	\$	110.00
04/21/2021	Review and edit opposition to motion to dismiss drafted by Amanda Steiner and email to co-counsel with comments.	1.20	\$	660.00
04/22/2021	Review Gantz/Tussy discovery responses	0.30	\$	165.00
04/22/2021	Review motion for protective order and email comments to co-counsel	0.50	\$	275.00
04/23/2021	Begin drafting opposition to motion for protective order	0.30	\$	165.00
04/23/2021	Email to Amanda Steiner and co-counsel re: edits to opposition to motion to dismiss	0.10	\$	55.00
04/23/2021	Review and edit opposition to motion to dismiss	0.90	\$	495.00
04/25/2021	Review Washington AG complaints against Seed Capital and send email to co-counsel re: whether to use in filing	0.30	\$	165.00
04/25/2021	Review and edit Paul Arons declaration in support of Plaintiff's opposition to motion to dismiss	0.20	\$	110.00

04/26/2021	Status update phone call with Blythe Chandler and Sam Leonard	0.10	\$	55.00
04/28/2021	Draft opposition to motion for protective order	6.00	\$	3,300.00
04/29/2021	Draft declaration in support of response to motion for protective order/coordinate citations with memorandum	0.80	\$	440.00
04/29/2021	Review and edit revised version of opposition to motion for protective order	0.40	\$	220.00
05/03/2021	Review reply memos on Gantz/Tussy motion to dismiss and motion for protective order	0.10	\$	55.00
05/06/2021	Review motion to dismiss in preparation for phone conference with Blythe Chandler and Amanda Steiner re: hearing	0.70	\$	385.00
05/06/2021	Phone conference with Blythe Chandler and Amanda Steiner re: hearing	0.80	\$	440.00
05/10/2021	Email to Collin Jayne re: outstanding discovery	0.20	\$	110.00
05/10/2021	Phone call w/Blythe Chandler re: pursuing discovery and case strategy	0.20	\$	110.00
05/11/2021	Draft additional written discovery for Gantz and Tussy	0.60	\$	330.00
05/11/2021	Review emails from Collin Payne, Blythe Chandler response and draft edits to Chandler response.	0.30	\$	165.00
05/14/2021	Email to co-counsel re: Gantz/Tussy overdue discovery	0.10	\$	55.00
05/17/2021	Review and respond to email from Collin Jayne regarding discovery	0.20	\$	110.00
05/22/2021	Email to co-counsel with draft of letter to Collin Payne re: documents that defendants deny having	0.60	\$	330.00
05/24/2021	Review discovery documents served by Erik Gantz and email co-counsel re: response.	0.40	\$	220.00
05/26/2021	Begin reviewing Gantz discovery responses and drafting meet and confer letter	1.20	\$	660.00
05/27/2021	Complete drafting meet and confer letter re: Gantz/Tussy discovery responses and forward to co-counsel with comments.	0.20	\$	110.00
06/01/2021	Email to Collin Payne re: motion to extend time and clarification of class definition	0.10	\$	55.00
06/01/2021	Review email from Collin Jayne re: confusing class definition in discovery requests, review discovery requests and First Amended Complaint, draft revised definition and forward to co-counsel for review.	0.20	\$	110.00
06/09/2021	Email to co-counsel reporting on interview	0.10	\$	55.00
06/09/2021	Phone interview with former Seed employee	0.60	\$	330.00

06/09/2021	Discussion with investigator David Cohen	0.20		
			\$	110.00
06/10/2021	Review Kevin Tussy discovery responses to 2nd Set of written discovery	0.20	\$	110.00
06/11/2021	Preliminary draft of statement for witness ()	0.40	\$	220.00
06/14/2021	Review prior seedcapital.com emails and email Collin Jayne re: location and status of emails.	0.40		
			\$	220.00
06/14/2021	Review Seed Capital documents produced by Tussy and email Collin Jayne re: outstanding discovery	1.00	\$	550.00
06/15/2021	Detailed review of Gantz discovery responses and draft meet and confer letter	1.50	\$	825.00
06/15/2021	Review Gantz response re: emails and exchange multiple emails with Collin Jayne and co-counsel re: email preservation	0.30		
			\$	165.00
06/16/2021	Review and edit meet and confer letter to Collin Jayne	0.20	\$	110.00
06/16/2021	Exchange emails with co-counsel re: discovery of seedcapital.com emails.	0.20	\$	110.00
06/16/2021	Research the Stored Communications Act and email co-counsel to discuss discovery issues.	0.30		
			\$	165.00
06/17/2021	Phone call from Blythe Chandler re: class cert. and discovery and investigation issues	0.10		
			\$	55.00
06/17/2021	Review, research and edit subpoena for seedcapital.com emails.	0.30	\$	165.00
06/29/2021	Draft and forward revisions to description of document to be produced in Yahoo subpoena	0.30		
			\$	165.00
06/30/2021	Phone call with Sam Leonard re: meet and confer phone call with Collin Jayne and Sam Leonard re: Gantz/Tussy response to Second set of discovery	0.10	\$	55.00
06/30/2021	Review and respond to email from Collin Jayne re: subpoena for Yahoo emails, including quick review of Stored Communications Act	0.30		
			\$	165.00
06/30/2021	Meet and confer phone call with Collin Jayne and Sam Leonard re: Gantz/Tussy response to Second set of discovery	1.00	\$	550.00
07/01/2021	Draft meet and confer confirming letter	0.80	\$	440.00
07/01/2021	Draft revisions to meet and confer confirming letter in light of Sam Leonard changes and subsequent emails from Collin Jayne.	0.50		
			\$	275.00
07/02/2021	Review and revise letter to Collin Jayne re: discovery status	0.40	\$	220.00
07/06/2021	Review and respond to email from Collin Jayne re: credit card number confidentiality	0.10		
			\$	55.00

07/06/2021	Review and respond with revisions to Sarah Smith email re: Yahoo subpoena	0.10	\$	55.00
07/09/2021	Draft document production request re: CID response	0.10	\$	55.00
07/09/2021	Review letter from Collin Jayne re: discovery	0.20	\$	110.00
07/12/2021	Review emails produced by Erik Gantz and create summary table	2.00	\$	1,100.00
07/13/2021	Review emails produced on 7/12/21 and compare to class list produced by Gantz	1.00	\$	550.00
07/13/2021	Review confidentiality designations for emails produced on 7/12/21.	0.20	\$	110.00
07/13/2021	Review Collin Jayne July 9, 2021 letter re: discovery and draft response	0.90	\$	495.00
07/14/2021	Review and respond to email from Blythe Chandler re: discovery strategy	0.20	\$	110.00
07/19/2021	Draft email to send to class members to obtain evidence	0.50	\$	275.00
07/20/2021	Review and respond to email from Collin Jayne re: subpoena to Oath.	0.10	\$	55.00
07/20/2021	Review and analyze new document production from Gantz-client info and ability to pay worksheets.	1.80	\$	990.00
07/20/2021	Phone call with potential witness	0.30	\$	165.00
07/21/2021	Correct version of witness solicitation email and send to 13 Seed victims as test.	0.60	\$	330.00
07/21/2021	Review email from Collin Jayne attaching notary info, review document produced and email Jayne, asking for document in original format	0.20	\$	110.00
07/23/2021	Email to co-counsel re: case status	0.10	\$	55.00
07/23/2021	Phone call with Blythe Chandler re: update on discovery and case status	0.20	\$	110.00
07/23/2021	Phone call with potential witness (Patricia Neil)	0.80	\$	440.00
07/23/2021	Phone call with potential witness - (RL)	0.60	\$	330.00
07/26/2021	Review and respond to email from Collin Jayne re: producing documents related to CID	0.20	\$	110.00
07/26/2021	Phone call from David Cohen re: locating Sarah Burdick	0.10	\$	55.00
07/26/2021	Phone call with potential witness (Florence Barrett)	0.50	\$	275.00
07/28/2021	Tel. call w/ Blythe Chandler re: responding to Collin Jayne proposal on producing CID documents	0.10	\$	55.00
07/28/2021	Phone call with potential witness (NW)	0.60	\$	330.00
07/28/2021	Phone call with Collin Jayne, Blythe Chandler and HOLO re: CID document response	0.30	\$	165.00
07/28/2021	Phone call with potential witness (NI)	0.80	\$	440.00

08/02/2021	Email to co-counsel re: discovery issues	0.20	\$	110.00
08/02/2021	Draft declaration of Patricia Neil and email to Ms. Neil with comments	1.20	\$	660.00
08/03/2021	Review discovery and draft meet and confer letter re: undisclosed consultants.	1.00	\$	550.00
08/03/2021	Review discovery and draft witness statement (Florence Barrett)/send to witness with comments and instructions	1.30	\$	715.00
08/05/2021	Phone call with witness (GB)	0.10	\$	55.00
08/06/2021	Phone call with potential witness (JS)	0.70	\$	385.00
08/11/2021	Complete drafting of GB declaration and send to witness for review.	0.20	\$	110.00
08/11/2021	Review and respond to email from Blythe Chandler re: class certification and discovery	0.20	\$	110.00
08/11/2021	Phone call with potential witness (GB)	0.20	\$	110.00
08/12/2021	Draft proposed additional discovery re: coercing employees to be silent, and email to co-counsel	0.30	\$	165.00
08/13/2021	Review and respond to email from Collin Jayne re: discovery Gantz is producing.	0.10	\$	55.00
08/17/2021	Draft memorandum for legal assistants who will contact class members for declarations.	1.50	\$	825.00
08/23/2021	Review file and email Collin Jayne re: missing consultant names	0.10	\$	55.00
08/24/2021	Conference call with TMLG paralegals re: getting declarations	0.20	\$	110.00
08/26/2021	Research Nevada law on enforcement of foreign judgments and fraudulent transfers and email summary to co-counsel	0.60	\$	330.00
08/26/2021	Phone call with Terry Coffing, Collin Jayne, Sam Leonard and Blythe Chandler re: deposition scheduling and settlement/follow-up call with co-counsel re: discovery and settlement	1.10	\$	605.00
08/30/2021	Review Florence Barrett email re: victim statement.	0.20	\$	110.00
08/30/2021	Phone interview with potential witness (KG)	0.50	\$	275.00
08/31/2021	Draft witness declaration and send it to witness for review and editing (KG)	1.00	\$	550.00
08/31/2021	Review and respond to email from witness (Florence Barrett)	0.10	\$	55.00
08/31/2021	Phone call with potential witness (VL)	0.40	\$	220.00
08/31/2021	Email statement to potential witness (KG)	0.10	\$	55.00
09/01/2021	Draft document production request for alter ego documents	1.10	\$	605.00

09/01/2021	Review and respond to email from witness re: statement/revise in accordance with email (Florence Barrett)	0.10	\$	55.00
09/01/2021	Research Nevada alter ego law and email co-counsel re: additional discovery	0.40	\$	220.00
09/03/2021	Review notes and draft witness statement (VL)/email to witness with instructions.	0.70	\$	385.00
09/12/2021	Review and respond to email from potential witness (VL)	0.10	\$	55.00
09/16/2021	Email to co-counsel re: revisions to Proudlove declaration in support of motion for summary judgment	0.10	\$	55.00
09/16/2021	Review and revise Proudlove declaration in support of motion for summary judgment	0.10	\$	55.00
09/16/2021	Review and edit motion for class certification and email to co-counsel re: revisions.	1.20	\$	660.00
09/17/2021	Review and locate documents for Motion for Class Cert., and forward to Amanda Steiner with explanation of docs.	0.20	\$	110.00
09/20/2021	Phone call with client (re: class certification declaration)	0.10	\$	55.00
10/01/2021	Phone call and emails with potential witness (JS).	0.20	\$	110.00
10/02/2021	Review exhibits and edit Class Certification reply memorandum	0.70	\$	385.00
10/02/2021	Respond to email from potential witness (PN)	0.10	\$	55.00
10/03/2021	Emails with Amanda Steiner re: revisions to class certification reply memorandum and Arons declaration	0.60	\$	330.00
10/05/2021	Review Collin Jayne email re: responding to discovery and email co-counsel	0.20	\$	110.00
10/05/2021	Review and highlight FTC v. Seed and email to co-counsel	0.20	\$	110.00
10/05/2021	Preparation for Deposition of Kevin Tussy	0.80	\$	440.00
10/05/2021	Deposition of Erik Gantz	7.00	\$	3,850.00
10/06/2021	Review multiple documents, speak with co-counsel, draft outline and prepare for Tussy deposition	6.00	\$	3,300.00
10/08/2021	Review email from potential witness, revise witness statement and forward to witness for signature. (Patricia Neil)	0.30	\$	165.00
10/08/2021	Prepare for deposition of Kevin Tussy, including prep during breaks	0.50	\$	275.00
10/08/2021	Deposition of Kevin Tussy, including prep during breaks	4.40	\$	2,420.00
10/11/2021	Review discovery responses and begin drafting meet and confer email to Collin Jayne	2.00	\$	1,100.00

10/13/2021	Continue researching and drafting meet and confer letter to Collin Jayne.	1.50	\$	825.00
10/15/2021	Complete drafting meet and confer letter to Collin Jayne	0.40	\$	220.00
10/18/2021	Review and edit meet and confer letter re: outstanding discovery issues	0.20	\$	110.00
10/18/2021	Review class certification order and email client	0.10	\$	55.00
10/20/2021	Review and edit declarations of KG and SF forward to Blythe for Docusign conversion.	0.10	\$	55.00
10/20/2021	Phone call with co-counsel to discuss class cert order/discovery/summary judgment and further actions	0.80	\$	440.00
10/20/2021	Email to client notifying him of Order Granting Class Cert.	0.10	\$	55.00
10/22/2021	Discussion with co-counsel re: follow-up to meet and confer phone call with Collin Jayne	0.20	\$	110.00
10/22/2021	Meet and confer phone call w/ Collin Jayne, Blythe Chandler and Sam Leonard	0.90	\$	495.00
10/23/2021	Begin reviewing documents and drafting confirming letter re: October 22, 2021 meet and confer phone call with Collin Jayne	1.70	\$	935.00
10/24/2021	Complete research and drafting of meet and confer follow-up letter.	1.40	\$	770.00
10/26/2021	Draft class notice section addressing Response Sub-Class	0.60	\$	330.00
10/26/2021	Review and edit proposed class notices, and email Blythe Chandler, with comments.	0.40	\$	220.00
11/09/2021	Review CSOA leg history	0.20	\$	110.00
11/09/2021	Begin researching and drafting summary judgment argument on CSOA violations.	1.50	\$	825.00
11/09/2021	Research CSOA leg history and contact WA archive service in Secretary of State office	0.30	\$	165.00
11/10/2021	Review file and email Blythe Chandler and Sam Leonard re: CSOA violations	0.20	\$	110.00
11/12/2021	Review and compile facts for summary judgment	3.40	\$	1,870.00
11/17/2021	Review and edit motion for approval of class notice plan.	0.30	\$	165.00
11/29/2021	Email to opposing counsel re: failure to provide discovery	0.20	\$	110.00
11/29/2021	Review prior discovery responses and correspondence and contact co-counsel re: further action	0.40	\$	220.00
11/30/2021	Review and respond to email from Collin Jayne re: outstanding discovery	0.20	\$	110.00
11/30/2021	Begin researching and drafting motion to compel discovery	4.50	\$	2,475.00
12/02/2021	Begin review of emails produced by Gantz on 12/1/2021.	0.50	\$	275.00

12/02/2021	Continued drafting of motion to compel discovery from Gantz and Tussy	1.20	\$	660.00
12/03/2021	Emails with Blythe Chandler re: motion to compel and other discovery issues	0.20	\$	110.00
12/03/2021	Complete initial drafting of motion to compel discovery from Gantz and Tussy	2.00	\$	1,100.00
12/05/2021	Revised and correct Motion to Compel Production of Documents Prior to circulating it to co-counsel	1.50	\$	825.00
12/08/2021	Email to Collin Jayne re: Defendants' failure to respond to document production requests	0.30	\$	165.00
12/08/2021	Phone call with Blythe Chandler re: revisions to motion to compel	0.20	\$	110.00
12/10/2021	Initial review of Defendant's summary judgment motion and send emails to co-counsel regarding scheduling issues	0.40	\$	220.00
12/13/2021	Email to Collin Jayne and Terry Coffing re: producing documents in response to pending document production requests.	0.20	\$	110.00
12/13/2021	Conference call with Blythe Chandlers, Sarah Smith and Sam Leonard re: opposition to motion for summary judgment	0.30	\$	165.00
12/16/2021	Review email from Collin Jayne re: alter ego discovery, exchange emails with Blythe Chandler re: motion to compel	0.30	\$	165.00
12/20/2021	Complete final draft of motion to compel, draft supporting declaration, organize exhibits and submit to co-counsel for final review	2.70	\$	1,485.00
12/24/2021	Review and edit opposition memo to motion for summary judgment	0.60	\$	330.00
12/30/2021	Initial review of defendants' opposition to motion to compel	0.20	\$	110.00
12/31/2021	Email to Collin Jayne re: Gantz effort to produce emails.	0.20	\$	110.00
12/31/2021	Initial draft of reply to opposition to motion to compel production of documents	5.00	\$	2,750.00
01/02/2022	Complete final edits on draft motion to compel reply-research and insert evidence citations	0.50	\$	275.00
01/03/2022	Draft email response to Collin Jayne re: emails to be produced by Defendants	0.50	\$	275.00
01/04/2022	Review email from Collin Jayne re: emails, review Sarah Burdick customer records and draft proposed responsive email	1.30	\$	715.00
01/04/2022	Phone call to class member Gary Busch re: FTC check and case status	0.10	\$	55.00
01/06/2022	Zoom meeting with Blythe Chandler, Elizabeth Adams and Beth Terrell re: preparing for hearing on Defendants' Motion for Summary Judgment	1.00	\$	550.00
01/07/2022	Hearing on Defendant Motion for Summary Judgment	0.00	\$	-
01/08/2022	Email to co-counsel re: contacting class members for victim testimony.	0.30	\$	165.00

01/10/2022	Draft proposed letter to class members and email to co-counsel with comments	0.60	\$	330.00
01/11/2022	Review and respond to email from Blythe Chandler re: contacting class members for witness statements/review spreadsheet and draft communication	0.30	\$	165.00
01/25/2022	Draft witness statement (TC) and send to witness for review	0.90	\$	495.00
01/25/2022	Revise witness letter to class members and email 25 class members	1.20	\$	660.00
01/25/2022	Phone call with potential witness (TC)	0.60	\$	330.00
01/26/2022	Email to potential witness attaching exhibit (TC)	0.10	\$	55.00
01/27/2022	Phone call with Toney Clark re: records of Seed and emails	0.30	\$	165.00
01/28/2022	Email to Amanda Miller attaching documents and discussing declaration.	0.20	\$	110.00
01/28/2022	Phone call with potential witness (AD)	0.40	\$	220.00
01/28/2022	Phone call with potential witness (AM)	0.50	\$	275.00
01/28/2022	Email to Alexander Day attaching documents and discussing declaration.	0.20	\$	110.00
01/31/2022	Draft Alexander Day declaration	0.60	\$	330.00
01/31/2022	Research Kris Krohn, review Seed discovery responses and draft Amanda Miller declaration/forward to witness	1.10	\$	605.00
02/01/2022	Revise Toney Clark declaration/review emails and select and prepare declaration exhibits	1.10	\$	605.00
02/01/2022	Review and revise Amanda Steiner draft of plaintiff's summary judgment motion, including contacting declarants	4.80	\$	2,640.00
02/02/2022	Review research and email to co-counsel re: Tussy reference to "obscure" Washington law	0.20	\$	110.00
02/02/2022	Phone call with Beth Terrell and Blythe Chandler re: filing declarations in support of motion for summary judgment	0.30	\$	165.00
02/02/2022	Revise Alex Day declaration and email to witness	0.20	\$	110.00
02/02/2022	Research liability issues re: filing declarations in support of motion for summary judgment	0.30	\$	165.00
02/02/2022	Phone call with witness re: use of declaration (Toney Clark)	0.20	\$	110.00
02/02/2022	Phone call with witness re: use of declaration (Florence Barrett)	0.20	\$	110.00
02/02/2022	Phone call with witness re: use of declaration (Patty Neil)	0.20	\$	110.00

02/02/2022	Phone call with witness re: filing declaration (Amanda Miller)	0.20	\$	110.00
02/03/2022	Phone call with Alex Day re: declaration	0.20	\$	110.00
02/03/2022	Phone call with potential witness TW	0.30	\$	165.00
02/03/2022	Review and revise motion for summary judgment	2.50	\$	1,375.00
02/03/2022	Phone call with potential witness (CL)	0.40	\$	220.00
02/03/2022	Phone call with Florence Barrett re: filing declaration	0.20	\$	110.00
02/03/2022	Phone call with Gary Busch re: filing declaration	0.20	\$	110.00
02/03/2022	Phone calls (2) with Gary Busch	0.40	\$	220.00
02/22/2022	Review Defendants' Opposition to Motion for Summary Judgment and attached declarations.	1.00	\$	550.00
02/22/2022	Review court order granting motion to compel/forward with comments to co-counsel	0.10	\$	55.00
02/22/2022	Email to co-counsel re: Defendants' Opposition to Motion for Summary Judgment and attached declarations.	0.40	\$	220.00
02/23/2022	Review and respond to email from Amanda Steiner re: summary judgment reply on issue of Ability to Pay worksheet.	0.20	\$	110.00
02/23/2022	Initial draft of reply to argument on Ability to Pay worksheet	2.40	\$	1,320.00
02/25/2022	Complete review and edits of mediation letter/forward to co-counsel with comments.	0.40	\$	220.00
02/27/2022	Review Amanda Steiner draft of Reply Memo re: Summary Judgment and email comments.	0.60	\$	330.00
02/27/2022	Review and draft revision to Section E of Amanda Steiner draft of Reply Memo re: Summary Judgment and email comments.	1.00	\$	550.00
02/28/2022	Email to Collin Jayne requesting entire email string with Wells Fargo	0.10	\$	55.00
02/28/2022	Review email from Collin Jayne re: Defendants failure to comply with discovery order, draft proposed letter to Collin Jayne, email with co-counsel.	1.60	\$	880.00
03/02/2022	Email to Blythe Chandler re: preparing for summary judgment hearing	0.10	\$	55.00
03/02/2022	Review and respond to email from Collin Jayne re: status of compliance with discovery order	0.40	\$	220.00
03/03/2022	Review summary judgment filings and participate in phone call with co-counsel re: preparation for summary judgment hearing.	1.90	\$	1,045.00

03/08/2022	Mediation with all parties.	4.70	\$	2,585.00
03/09/2022	Review tax returns produced pursuant to court order and accompanying email. Email Collin Jayne in response.	0.30	\$	165.00
03/11/2022	Conference call with co-counsel to discuss pretrial statement and prepare for pretrial conference.	0.80	\$	440.00
03/11/2022	Pretrial conference	0.40	\$	220.00
03/13/2022	Review and edit response to "Motion for Clarification" re: personal jurisdiction.	0.20	\$	110.00
03/14/2022	Email to Collin Jayne re: disbursement spreadsheet from QuickBooks	0.20	\$	110.00
03/14/2022	Detailed review of documents produced in response to Court discovery order, summarize and draft memo re: deficiencies	6.80	\$	3,740.00
03/31/2022	Email to co-counsel re: new trial date and discovery issues	0.10	\$	55.00
03/31/2022	Preliminary review of most recent bank statements produced/prepare sub-totals spreadsheet for Feb. 2018	0.60	\$	330.00
03/31/2022	Conference call re: new trial date and discovery issues	0.30	\$	165.00
04/11/2022	Review and respond to Blythe Chandler email re: new case schedule order	0.20	\$	110.00
04/12/2022	Review email from Blythe Chandler and research issue of authenticity of documents produced during discovery.	0.60	\$	330.00
04/13/2022	Review and revise discovery letter re: compliance with discovery order and transmit with explanatory email	0.80	\$	440.00
04/14/2022	Review email from Collin Jayne re scheduling meet and confer phone call and contact co-counsel	0.10	\$	55.00
04/19/2022	Post-call phone conference with Blythe Chandler re: meet and confer phone call with opposing counsel and Blythe Chandler re: compliance with order compelling discovery/discussion of other discovery issues	0.20	\$	110.00
04/19/2022	Revise confirming letter re: meeting and conferring	0.30	\$	165.00
04/19/2022	Meet and confer phone call with opposing counsel and Blythe Chandler re: compliance with order compelling discovery	0.60	\$	330.00
04/19/2022	Draft confirming letter after meet and confer phone call, including researching available documents produced in discovery	4.40	\$	2,420.00
04/19/2022	Review and revise Blythe Chandler revised version of post-meet and confer letter to opposing counsel	0.50	\$	275.00
04/26/2022	Begin organizing and drafting CR 37(b)(2) motion re: alter ego issues	2.50	\$	1,375.00

04/27/2022	Continue organizing and drafting CR 37(b)(2) motion re: alter ego issues	2.50	\$	1,375.00
04/27/2022	Email co-counsel re: CR 37(b)(2) motion re: alter ego issues	0.10	\$	55.00
04/28/2022	Draft motion for sanctions pursuant to CR 37(b)(2)	4.50	\$	2,475.00
04/30/2022	Complete revisions to motion for sanctions	0.20	\$	110.00
04/30/2022	Revise motion for sanctions	1.10	\$	605.00
05/02/2022	Review email from Collin Jayne and send email to Jayne re: QuickBooks files and email to co-counsel re: inadequacy of response	0.40	\$	220.00
05/02/2022	Draft meet and confer letter in response to the May 2, 2022 email from Colin Jayne.	1.50	\$	825.00
05/03/2022	Review email from Collin Jayne re: QuickBooks files and draft response for review by co-counsel	0.40	\$	220.00
05/04/2022	Complete edits and transmit letter to Collin Jayne re: failure to comply with Feb. 22, 2022 discovery order	0.10	\$	55.00
05/17/2022	Review recent meet and confer letters and draft email to Matt Wojcik regarding Tussy discovery responses	0.40	\$	220.00
05/19/2022	Research documents and draft Motion for Sanctions for Violation of Discovery Order	5.00	\$	2,750.00
05/20/2022	Review and analyze financial documents and continue drafting motion for sanctions	5.50	\$	3,025.00
05/21/2022	Review and analyze financial documents and continue drafting motion for sanctions	2.00	\$	1,100.00
05/23/2022	Research on alter ego requirements in Nevada and Washington	1.50	\$	825.00
05/25/2022	Draft declaration in support of motion for sanctions	0.90	\$	495.00
05/25/2022	Draft declaration in support of motion for sanctions	0.90	\$	495.00
05/26/2022	Complete draft declaration in support of motion for sanctions, create Appendix of AMX chat, replace some exhibits with new documents	2.90	\$	1,595.00
05/26/2022	Draft proposed order re motion for sanctions for violation of the discovery order.	1.00	\$	550.00
05/27/2022	Create exhibits of summaries of Amber Liu AMX and WCAP deposits for use in motion for sanctions	0.50	\$	275.00
05/27/2022	Review email from Eden Nordby re: motion for sanctions/review documents and prior correspondence re: confidentiality designations/email response to Eden.	0.20	\$	110.00
05/27/2022	Review and revise motion for sanctions and email to co-counsel with comments	0.90	\$	495.00

05/31/2022	Review and respond to email from witness Florence Barrett re: case status and testifying	0.20		
			\$	110.00
05/31/2022	Draft and send witness solicitation letter to ten class members.	0.60	\$	330.00
06/01/2022	Phone call with potential witness (HA)	0.30	\$	165.00
06/02/2022	Organize and execute mass witness inquiry email to 125 class members	1.00	\$	550.00
06/02/2022	Review and respond to email from class members who received witness inquiry email.	0.20		
			\$	110.00
06/02/2022	Review email from Collin Jayne re pending motion for sanctions and draft and email a response.	0.70	\$	385.00
06/03/2022	Revise witness contact email	0.20	\$	110.00
06/03/2022	Revise witness inquiry email to add field for fees paid to Seed	0.20	\$	110.00
06/03/2022	Phone call with potential witness (RB).	0.40	\$	220.00
06/03/2022	Phone call with potential witness (GB)	0.60	\$	330.00
06/03/2022	Draft witness memo and compile documents for potential witness (GB)	0.60	\$	330.00
06/04/2022	Emails with attachments to potential witnesses scheduled for phone calls	0.40	\$	220.00
06/04/2022	Review account statements for WF 4248, compile entries re AMX payments and Kabbage loan/email opposing counsel and co-counsel.	1.30		
			\$	715.00
06/06/2022	Review and respond to email from potential witness (DC)	0.30	\$	165.00
06/06/2022	Review and respond to email from potential witness (DC)	0.20	\$	110.00
06/06/2022	Phone call with potential witness (MF)	0.60	\$	330.00
06/06/2022	Review discovery for potential witness documents and email potential witness (MF)	0.20		
			\$	110.00
06/06/2022	Draft interview notes for potential witness (CC)	0.30	\$	165.00
06/06/2022	Review and respond to email from Collin Jayne re: compliance with the discovery order.	0.60		
			\$	330.00
06/06/2022	Phone call with CC	0.60	\$	330.00
06/06/2022	Phone call with potential witness (RG)	0.60	\$	330.00
06/07/2022	Phone interview with potential witness (LC)	0.40	\$	220.00
06/07/2022	Draft notes of phone interview with potential witness (LC)	0.50	\$	275.00

06/07/2022	Begin review of opposition to motion for sanctions and begin drafting reply memo.	1.00		
			\$	550.00
06/07/2022	Continue review of opposition to motion for sanctions and begin drafting reply memo.	2.70		
			\$	1,485.00
06/07/2022	Phone interview with potential witness (DB)	0.50		
			\$	275.00
06/08/2022	Complete initial draft of reply memo	3.70		
			\$	2,035.00
06/08/2022	Email co-counsel initial draft of reply memo	0.20		
			\$	110.00
06/08/2022	Organize and label exhibits and draft declaration.	2.90		
			\$	1,595.00
06/13/2022	Phone interview with potential witness (RB)	0.50		
			\$	275.00
06/14/2022	Review email responses to witness solicitation email/search data base for witness documents and respond to witness emails	0.70		
			\$	385.00
06/14/2022	Phone call with potential witness (SM)	0.40		
			\$	220.00
06/15/2022	Review and respond to witness emails re: scheduling interviews	0.60		
			\$	330.00
06/15/2022	Phone call with potential witness (DK)	0.40		
			\$	220.00
06/15/2022	Phone call with potential witness (JK)	0.40		
			\$	220.00
06/15/2022	Phone call with potential witness (EH)	0.40		
			\$	220.00
06/15/2022	Phone call with potential witnesses (RAB)	0.60		
			\$	330.00
06/15/2022	Phone call with potential witness (KPL)	0.40		
			\$	220.00
06/16/2022	Review email from Tussy counsel re: depositions and send response to co-counsel	0.20		
			\$	110.00
06/16/2022	Phone call with potential witness (SM)	0.30		
			\$	165.00
06/16/2022	Phone call with potential witness (LM)	0.30		
			\$	165.00
06/16/2022	Phone call with Alyssa Jurgenmeyer/Patrick Ford	0.50		
			\$	275.00
06/20/2022	Review Seed emails forwarded by class members and summary judgment decision in FTC v. Response	1.50		
			\$	825.00
06/20/2022	Phone call with potential witness (Martha Hills)	0.40		
			\$	220.00
06/20/2022	Phone call with potential witness (Martha Hills)	0.40		
			\$	220.00
06/20/2022	Phone call with potential witness (ME)	0.90		
			\$	495.00
06/20/2022	Phone call with potential witness (SJ)	0.50		
			\$	275.00

06/21/2022	Phone call with co-counsel, Eden Nordby, Beth Terrell, Blythe Chandler, re planning for trial	1.50		
			\$	825.00
06/22/2022	Phone interview with potential witness (VJ)	0.30		
			\$	165.00
06/27/2022	Review email from Mary Butler re: additional discovery and email comments to co-counsel	0.40		
			\$	220.00
06/27/2022	Review class member information and compile list of possible trial witnesses	3.00		
			\$	1,650.00
06/28/2022	Review class member information and compile list of possible trial witnesses	2.50		
			\$	1,375.00
06/28/2022	Review transcript of summary judgment hearing	0.30		
			\$	165.00
06/29/2022	Review class member information and compile list of possible trial witnesses	3.00		
			\$	1,650.00
06/29/2022	Zoom conference with co-counsel re: discovery and trial preparation	1.60		
			\$	880.00
07/02/2022	Review email from Beth Terrell re: causation and draft memo in response	1.70		
			\$	935.00
07/05/2022	Review Mary Butler email and forward comments to co-counsel	0.20		
			\$	110.00
07/05/2022	Review sanctions order and forward comments to co-counsel	0.20		
			\$	110.00
07/05/2022	Review notes and draft witness memos	2.50		
			\$	1,375.00
07/06/2022	Phone call with potential witness (JP)	0.10		
			\$	55.00
07/06/2022	Phone call with potential witness (Patty Neal)	0.20		
			\$	110.00
07/06/2022	Phone call w/ potential witness (TC)	0.20		
			\$	110.00
07/06/2022	Tel. call with client re: deposition	0.20		
			\$	110.00
07/06/2022	Email to co-counsel re: trial planning meeting set for tomorrow	0.20		
			\$	110.00
07/06/2022	Review and compile witness documents	4.00		
			\$	2,200.00
07/06/2022	Review and respond to email from Beth Terrell re: trial preparation	0.30		
			\$	165.00
07/06/2022	Phone call w/ potential witness (Florence Barrett)	0.20		
			\$	110.00
07/07/2022	Phone call with potential witness (RER)	0.20		
			\$	110.00
07/07/2022	Respond to email from potential witness (CR)	0.10		
			\$	55.00
07/07/2022	Review and respond to email from potential witness (MLR)	0.10		
			\$	55.00
07/07/2022	Email to co-counsel re: claims under the CSOA	0.10		
			\$	55.00
07/07/2022	Email to potential witness (DR)	0.20		
			\$	110.00
07/07/2022	Zoom conference re trial prep with Beth Terrell, Blythe Chandler and Sam Leonard	0.90		
			\$	495.00

07/07/2022	Phone call w/potential witness (DR)	0.30	\$	165.00
07/07/2022	Phone call with potential witness (MLR)	0.20	\$	110.00
07/11/2022	Phone call with Doug P. re: deposition preparation	0.10	\$	55.00
07/11/2022	Organize documents for Proudlove deposition prep.	0.20	\$	110.00
07/12/2022	Respond to email from Beth Terrell re Martha Hills, review documents and send response	0.30	\$	165.00
07/12/2022	Review discovery and declaration produced by Erik Gantz and email co-counsel with comments	0.50	\$	275.00
07/12/2022	Zoom call with potential witness (Patricia Neil)	0.90	\$	495.00
07/12/2022	Zoom call with potential witness (Florence Barrett)	0.90	\$	495.00
07/12/2022	Zoom call with co-counsel re: witnesses and trial strategy	0.50	\$	275.00
07/13/2022	Transcribe interview notes for potential witnesses (LSP)	0.20	\$	110.00
07/13/2022	Review time records and draft attorney's fee declaration in support of sanction fee award	0.90	\$	495.00
07/13/2022	Phone call with co-counsel to discuss trial strategy and preparation/depositions	1.00	\$	550.00
07/13/2022	Phone call with potential witnesses (SLP)	0.90	\$	495.00
07/13/2022	Phone call with potential witness and post interview discussion with co-counsel (Alyssa Jurgenmeyer)	0.80	\$	440.00
07/14/2022	Review and respond to emails and phone call from potential witnesses/review their records produced by Defendants	1.00	\$	550.00
07/15/2022	Review Gantz motion for clarification and email co-counsel	0.20	\$	110.00
07/18/2022	Review emails re: Tussy and Gantz depositions and email co-counsel	0.20	\$	110.00
07/18/2022	Tel. call with potential witness (LP)	0.20	\$	110.00
07/19/2022	Review and annotate QuickBooks data	1.00	\$	550.00
07/19/2022	Begin reviewing data and drafting letter to Collin Jayne re: Gantz failure to comply,	1.00	\$	550.00
07/19/2022	Phone call with Jodi Nuss and Beth Terrell re: QuickBooks files, witnesses and deposition scheduling. (Sam Leonard was on call but had to drop off.)	1.90	\$	1,045.00
07/19/2022	Review QuickBooks register for missing checks and compare with bank records	0.60	\$	330.00

07/20/2022	Draft document requests for Tina Feoli subpoena and transmit, with comments, to co-counsel	0.50	\$	275.00
07/21/2022	Travel time for Doug Proudlove deposition preparation	3.00	\$	1,650.00
07/21/2022	Doug Proudlove deposition preparation in Mount Vernon	3.50	\$	1,925.00
07/22/2022	Phone call with Beth Terrell re case strategy and discovery	0.30	\$	165.00
07/22/2022	Review email re: Tina Feoli subpoena and add additional document request	0.10	\$	55.00
07/22/2022	Organize proposed trial witness list	0.30	\$	165.00
07/25/2022	Review and respond to email from Blythe Chandler re: trial preparation issues	0.40	\$	220.00
07/25/2022	Call to schedule witness interview zoom calls.	0.30	\$	165.00
07/25/2022	Emails with co-counsel re: QuickBooks inquiry and potential witnesses.	0.20	\$	110.00
07/25/2022	Zoom call with co-counsel re: trial preparation and discovery issues	0.50	\$	275.00
07/26/2022	Review Gantz and Tussy oppositions to sanctions fee motion and draft notes for Blythe Chandler regarding issues raised.	1.00	\$	550.00
07/26/2022	Draft insert for document preservation letter to Tina Feoli	0.20	\$	110.00
07/26/2022	Review Collin Jayne letter and attachments and email Collin re: AMX statements	0.30	\$	165.00
07/26/2022	Phone interview with potential witness and post-interview discussion with co-counsel(Martha Hills)	0.80	\$	440.00
07/27/2022	Travel to Burlington for Proudlove depo prep	2.00	\$	1,100.00
07/27/2022	Proudlove depo prep with Blythe Chandler and Sam Leonard	3.20	\$	1,760.00
07/28/2022	Phone call with potential witness (Sarah Stout)	0.40	\$	220.00
07/28/2022	Review and edit reply memo re: motion for attorney fees	1.90	\$	1,045.00
07/28/2022	Zoom meeting with potential witness (Beth Wills)	0.50	\$	275.00
07/28/2022	Zoom meeting with potential witness (MF)	0.50	\$	275.00
07/28/2022	Zoom discussions with Beth Terrell and Blythe Chandler re: witnesses and pretrial conference	0.30	\$	165.00
07/29/2022	Deposition of Douglas Proudlove	3.40	\$	1,870.00
07/30/2022	Deposition preparation with Douglas Proudlove, Blythe Chandler and Sam Leonard	2.30	\$	1,265.00
08/01/2022	Phone call with witness re: deposition scheduling and preparation (Patricia Neil)	0.10	\$	55.00

08/01/2022	Email to witnesses re: preparing for a deposition.	0.20	\$	110.00
08/01/2022	Review and edit Plaintiffs Motion to Clarify Order Denying MSJ and email to co-counsel with comments.	0.30	\$	165.00
08/01/2022	Phone call with witness re: deposition scheduling and preparation (Martha Hills)	0.20	\$	110.00
08/01/2022	Zoom interview of potential witness (AM)	1.00	\$	550.00
08/01/2022	Discussion with Blythe Chandler re: Zoom interview of potential witness (Amanda Miller) and dispute re: Kalen Consulting, et al. records	0.20	\$	110.00
08/01/2022	Phone call with witness re: deposition scheduling and preparation (Alyssa Jurgenmeyerl)	0.10	\$	55.00
08/01/2022	Phone call with witness re: deposition scheduling and preparation (Patricia Neil)	0.10	\$	55.00
08/02/2022	Phone call with witness re: upcoming deposition (Patty Neil)	0.20	\$	110.00
08/02/2022	Phone conference with Mary Butler, Blythe Chandler re: Tussy motion for protective order	0.60	\$	330.00
08/03/2022	Phone call and email with witness (Beth Wills)	0.20	\$	110.00
08/08/2022	Draft document request for American Express Subpoena	0.60	\$	330.00
08/08/2022	Email to co-counsel discussing document request for American Express Subpoena	0.20	\$	110.00
08/09/2022	Emails with Beth Terrell re: Amber Liu credit card documents	0.20	\$	110.00
08/09/2022	Emails with Beth Terrell, Blythe Chandler and Jodi Nuss re: QuickBooks production	0.30	\$	165.00
08/10/2022	Multiple emails with Beth Terrell re: Defendants' failure to comply with discovery order.	0.40	\$	220.00
08/10/2022	Review and correct Opposition to Tussy motion for protective order and supporting declaration of Blythe Chandler	0.10	\$	55.00
08/11/2022	Zoom call with co-counsel and QuickBooks experts	0.70	\$	385.00
08/11/2022	Zoom call with Beth Wills, Blythe Chandler and Eden Nordby for deposition preparation.	1.20	\$	660.00
08/12/2022	Organize documents for Beth Wills deposition preparation	0.30	\$	165.00
08/15/2022	Phone calls with Florence Barrett re: deposition preparation	0.10	\$	55.00
08/15/2022	Zoom preparation session with Florence Barrett, Blythe Chandler, Paul Arons	1.00	\$	550.00
08/16/2022	Multiple emails with co-counsel re: depositions of Tina Feoli and Florence Barrett	0.30	\$	165.00
08/16/2022	Zoom meeting with Alyssa Jurgenmeyer for deposition preparation, with co-counsel.	1.50	\$	825.00

08/17/2022	Zoom call with Florence Barrett and co-counsel for deposition preparation.	0.40	\$	220.00
08/17/2022	Zoom call for Florence Barrett deposition.	2.60	\$	1,430.00
08/17/2022	Zoom deposition of Elizabeth Wills	2.80	\$	1,540.00
08/18/2022	Phone call with witness (Florence Barrett)	0.20	\$	110.00
08/18/2022	Pretrial conference	0.30	\$	165.00
08/18/2022	Zoom call for depo prep with Alyssa Jurgenmeyer	1.10	\$	605.00
08/22/2022	Review and organize documents in preparation for witness deposition prep/email co-counsel (Martha Hills)	0.20	\$	110.00
08/22/2022	Deposition of Alyssa Jurgenmeyer	1.80	\$	990.00
08/24/2022	Review Douglas Proudlove deposition transcript	0.40	\$	220.00
08/24/2022	Deposition of Martha Hills	2.40	\$	1,320.00
08/24/2022	Review Douglas Proudlove deposition transcript and email proposed corrections to co-counsel	0.40	\$	220.00
08/25/2022	Emails with Blythe Chandler re: corrections to Douglas Proudlove deposition	0.30	\$	165.00
08/29/2022	Review and research FTC actions against Seed Capital partners	1.00	\$	550.00
08/29/2022	Review, research and edit proposed jury instructions	0.90	\$	495.00
08/30/2022	Zoom call deposition preparation with Patty Neil, Beth Terrell and Eden Nordby	1.50	\$	825.00
08/31/2022	Zoom deposition prep with Patricia Neil	0.30	\$	165.00
08/31/2022	Zoom deposition with Patricia Neil	2.90	\$	1,595.00
08/31/2022	Zoom call with co-counsel to discuss jury instructions and ER 904 list	1.20	\$	660.00
08/31/2022	Zoom call with QuickBooks experts Sean Thatcher and Linda Saunders	1.10	\$	605.00
09/01/2022	Phone call with Florence Barrett re: trial testimony/email co-counsel re: scheduling	0.20	\$	110.00
09/02/2022	Review and add documents to ER 904 list	1.50	\$	825.00
09/02/2022	Review and edit jury instructions	0.50	\$	275.00
09/02/2022	Phone call with Blythe Chandler re: jury instructions and ER 904 list	0.20	\$	110.00
09/06/2022	Emails with Beth Terrell re: providing deposition transcripts to witnesses/email Florence Barrett and Beth Wills re: reviewing and correcting deposition transcripts	0.30	\$	165.00

09/06/2022	Review and respond to email from witness (Florence Barrett)	0.10	\$	55.00
09/06/2022	Review and respond to email from Beth Terrell re: QuickBooks issues.	0.20	\$	110.00
09/06/2022	Review file re: American Express subpoena and contact co-counsel to discuss further action	0.10	\$	55.00
09/07/2022	Review prior communications with American Express, and draft letter with attachments re: compliance with subpoena to American Express	0.70	\$	385.00
09/07/2022	Review Florence Barrett deposition and documents in preparation for Zoom call with Florence Barrett	0.60	\$	330.00
09/07/2022	Zoom call with Florence Barrett re: deposition corrections	0.50	\$	275.00
09/08/2022	Review and respond to email from Blythe Chandler re: trial preparation	0.40	\$	220.00
09/08/2022	Review Pre-Trial Conference Order	0.20	\$	110.00
09/08/2022	Review Orders re: Clarifying summary judgment order/Tussy Motion for Protective Order	0.10	\$	55.00
09/09/2022	Zoom call with co-counsel re: pretrial preparation and tasks	1.10	\$	605.00
09/09/2022	Zoom call with Mary Butler, Mike Sanders, Beth Terrell, Blythe Chandler re meet and confer re: tax returns and financial records	0.60	\$	330.00
09/12/2022	Review, research QB records and provide detailed response to Beth Terrell email re: discovery of tax returns	0.50	\$	275.00
09/12/2022	Phone calls with Doug Proudlove re: deposition corrections	0.20	\$	110.00
09/12/2022	Review and respond to summary exhibits prepared by Blythe Chandler.	0.20	\$	110.00
09/12/2022	Review QB records for undisclosed account statements	0.80	\$	440.00
09/13/2022	Meet with client in Mt. Vernon to discuss trial preparation.	0.20	\$	110.00
09/14/2022	Email to co-counsel re: Doug Proudlove, AMX subpoena, Tina Feoli discovery and trial continuance	0.40	\$	220.00
09/14/2022	Review file and send email to American Express re: its failure to comply with subpoena	0.20	\$	110.00
09/15/2022	Review American Express cards produced by Erik Gantz, crosscheck against bank statements and send email to co-counsel summarizing what we received.	1.00	\$	550.00
09/18/2022	Begin drafting Motion to Hold American Express in Contempt for Failing to Comply with Subpoena.	1.00	\$	550.00
09/19/2022	Tel call from class member (GW)	0.20	\$	110.00

09/19/2022	Complete drafting Motion to Hold American Express in Contempt for Failing to Comply with Subpoena.	2.00	\$	1,100.00
09/19/2022	Draft Paul Arons declaration in support of Motion to Hold American Express in Contempt for Failing to Comply with Subpoena.	0.40	\$	220.00
09/19/2022	Draft proposed order granting Motion to Hold American Express in Contempt for Failing to Comply with Subpoena.	0.20	\$	110.00
09/19/2022	Research and draft motion in limine re: unfair and deceptive conduct.	1.30	\$	715.00
09/19/2022	Phone call with Beth Terrell re: settlement and trial issues	0.40	\$	220.00
09/20/2022	Complete drafting motion in limine re: unfair and deceptive conduct	0.90	\$	495.00
09/20/2022	Review and comment on latest revisions to Plaintiffs' Proposed Jury Instructions.	0.20	\$	110.00
09/20/2022	Review recently produced American Express credit card statements, compare to prior statements and Wells Fargo account statements and email Collin Jayne re: missing statements	0.50	\$	275.00
09/20/2022	Review recently produced American Express cards, compare with Wells Fargo bank statements, and draft email to Collin Jayne re: missing statements	0.50	\$	275.00
09/20/2022	Review and annotate Tussy Motions in Limine	0.70	\$	385.00
09/20/2022	Draft motion in limine re: voluntary payment	0.80	\$	440.00
09/21/2022	Review and edit revised declaration in support of Motion to Hold American Express in Contempt	0.10	\$	55.00
09/21/2022	Review and revise memo in support of Motion to Hold American Express in Contempt for Failing to Comply with Subpoena	0.20	\$	110.00
09/21/2022	Review and draft notes for preparation of Tina Feoli deposition.	0.50	\$	275.00
09/22/2022	Review email from Collin Jayne re: American Express credit cards, review bank and credit card statements, and respond	1.00	\$	550.00
09/22/2022	Review email from Nevada SOS website and obtain copies of Seed Consulting LLC revival	0.40	\$	220.00
09/22/2022	Email to Blythe Chandler and Beth Terrell re: Feoli depo and possible questions	0.30	\$	165.00
09/22/2022	Review FTC lawsuits against Seed partners and make requests for certified copies of selected filings	0.50	\$	275.00
09/23/2022	Review Gantz and Tussy ER 904 statements for objections and look up non-contract docs listed.	0.40	\$	220.00
09/23/2022	Review and prepare notes with document references for Feoli deposition	1.20	\$	660.00

09/23/2022	Email to co-counsel re: Gantz and Tussy ER 904 statements and other trial preparation issues.	0.10	\$	55.00
09/24/2022	Complete drafting issues for Tina Feoli to be deposed about	0.80	\$	440.00
09/24/2022	Phone call with co-counsel re: responding to Rule 68 Offer	0.80	\$	440.00
09/24/2022	Review and select documents for use in Feoli deposition from recent Feoli production and email to co-counsel with explanation for use of documents	1.50	\$	825.00
09/25/2022	Review and make revisions, comments and corrections to Plaintiff's Trial Brief	1.00	\$	550.00
09/25/2022	Review and make revisions, comments and corrections to Plaintiff's Findings of Fact and Conclusions of Law	0.40	\$	220.00
09/26/2022	Email to co-counsel re: phone call with Amex paralegal	0.10	\$	55.00
09/26/2022	Phone call with Joseph Diaz in response to our filing Motion for Contempt	0.20	\$	110.00
09/26/2022	Tina Feoli deposition - morning sessions	2.90	\$	1,595.00
09/26/2022	Deposition of Tina Feoli- Afternoon session	2.90	\$	1,595.00
09/27/2022	Draft Gantz depo outline and select exhibits	2.40	\$	1,320.00
09/27/2022	Phone call w/co-counsel re: settlement and trial preparation	0.70	\$	385.00
09/28/2022	Phone call and multiple emails with co-counsel re: settlement	0.50	\$	275.00
09/29/2022	Phone call with Doug Proudlove explaining settlement and getting approval	0.30	\$	165.00
09/29/2022	Phone calls, texts and emails with Doug Proudlove to get Settlement Agreement signature.	0.50	\$	275.00
10/06/2022	Review and edit preliminary approval filings	0.50	\$	275.00
11/15/2022	Review time records and draft attorney's fee declaration	1.40	\$	770.00
Totals For Proudlove v Seed Capital 534.15			\$	293,782.50
Deduction for Attorney's Fees on Sanctions Previously Adjudicated -39.70			\$	(21,835.00)
Grand Total 494.45			\$	271,947.50

- Exhibit 2 -

Law Office of Paul Arons - Expense Report

Expense Date	Invoice Id	Item	Bill Price
Douglas Proudlove			
04/17/2020		Postage for mail and return envelope to client for retainer agreement and documents	\$15.80
04/29/2020		Postage for mailing letter/agreement to client	\$8.05
05/22/2020		Postage for letter to Doug Proudlove and return	\$9.00
09/03/2021		Copies of Seed Consulting Nevada LLC filings	\$8.50
05/24/2022		Copies of LLC documents from Nevada Sec. of State	\$38.00
06/01/2022		Copies of LLC documents from Nevada Sec. of State	\$4.00
07/07/2022		Mail documents to Doug Proudlove for deposition preparation	\$8.95
07/22/2022		Ferry fare to travel to Mount Vernon for client meeting	\$40.00
07/30/2022		Ferry fare for return from client deposition	\$40.00
07/30/2022		Lodging for deposition preparation and deposition (2 nights)	\$331.16
09/23/2022		Certified copy fee plus postage-FTC v. MOBE	\$46.90
09/23/2022		Certified copy fee plus postage-FTC v. Response, FTC v. Zurixx	\$235.00
Grand Total			\$785.36