

THE HONORABLE JASON POYDRAS  
Department 18  
Noted for Motion: January 13, 2023 at 1:00 p.m.  
With Oral Argument

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 BLYTHE H. CHANDLER  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR ATTORNEYS' FEES, COSTS AND  
SERVICE AWARDS**

I, Blythe H. Chandler, declare as follows:

**A. Background and experience.**

1. I am a member of the law firm of Terrell Marshall Law Group PLLC (Terrell Marshall), counsel of record for plaintiff in this matter. I am admitted to practice before this Court and am a member in good standing of the bar of the state of Washington. I respectfully submit this declaration in support of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

1           2.       Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex  
2 civil and commercial litigation with an emphasis on consumer protection, product defect, civil  
3 rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel  
4 representing multi-state and nationwide classes in state and federal court in Washington and  
5 throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have  
6 represented scores of classes, tried class actions in state and federal court, and obtained  
7 hundreds of millions of dollars in monetary relief to workers, consumers, and other individuals.

8           3.       I joined Terrell Marshall in 2014 and became a member in 2018. I practice  
9 complex litigation with a focus on prosecution of consumer class actions. I have been appointed  
10 class counsel in cases challenging a wide range of unfair or deceptive practices, including debt  
11 collection practices. In 2010, I received my J.D. from the University of Washington School of  
12 Law with high honors, Order of the Coif. I served as Chief Articles Editor for the Washington Law  
13 Review. Before joining Terrell Marshall, I served as a law clerk to the Honorable Betty B.  
14 Fletcher, Senior United States Circuit Judge for the Ninth Circuit Court of Appeals, and to the  
15 Honorable John C. Coughenour, Senior United States District Judge for the Western District of  
16 Washington. I also served as a judicial extern to the Honorable Robert S. Lasnik, United States  
17 District Judge for the Western District of Washington. I co-authored chapters of the Consumer  
18 Protection Deskbook published by the Washington State Association for Justice (WSAJ) and  
19 have spoken on topics including use of experts and personal jurisdiction in class actions. I am a  
20 member of the Washington Employment Lawyers Association (WELA) Amicus Committee and  
21 currently co-chair WSJA's Consumer Protection Section. I was named to the 2020 Rising Star List  
22 by Washington Super Lawyers.

23 **B.       Qualifications of other Terrell Marshall attorneys.**

24           4.       Beth E. Terrell is a founding member of Terrell Marshall. With over twenty years  
25 of experience, Ms. Terrell concentrates her practice in complex litigation, including the  
26 prosecution of consumer protection, defective product, and wage and hour class actions. Ms.  
27 Terrell has served as co-lead counsel on multi-state, multi-district, and nationwide class actions,

1 resulting in hundreds of millions of dollars in settlements for consumers and workers. Ms.  
2 Terrell also represents individual employees with wage and hour, workplace exposure, and  
3 discrimination claims. Ms. Terrell has tried and won cases in state and federal courts and  
4 argued before the Washington State Court of Appeals and the Washington State Supreme Court  
5 as well as several federal circuit level courts. Ms. Terrell served as the President of the Public  
6 Justice Foundation Board of Directors from July 2019 to July 2020, serves on the Equal Justice  
7 Works' Board of Counselors, and is Chair of both the Northwest Consumer Law Center and the  
8 Washington Employment Lawyers Association. A member of the State Bar of California and the  
9 Washington State Bar Association, Ms. Terrell Co-Chairs PLI's Consumer Financial Services  
10 Institute, and frequently presents on a wide variety of topics, including class actions, consumer  
11 protection, legal ethics, gender equity, and electronic discovery.

12           5.       Amanda M. Steiner became a member of Terrell Marshall in 2015. She practices  
13 complex litigation, including the prosecution of consumer, defective product, wage and hour,  
14 and civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in  
15 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that  
16 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex  
17 securities, antitrust, consumer and civil rights class action in federal and state courts  
18 throughout the United States. Ms. Steiner was selected for inclusion in the annual Northern  
19 California "Super Lawyers" list and was named to the Top 50 Women Lawyers of Northern  
20 California. She is a Fellow of the American Bar Foundation.

21           6.       Elizabeth A. Adams joined Terrell Marshall in 2015 and became a member of  
22 Terrell in 2022. Ms. Adams concentrates her practice in complex litigation, including the  
23 prosecution of consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams  
24 received her J.D. from the UCLA School of Law, where she received the Order of the Coif and  
25 served as a Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms.  
26 Adams served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu,  
27

1 and the Honorable John A. Kronstadt, all of the United States District Court for the Central  
2 District of California.

3 7. Eden Nordby joined Terrell Marshall as an associate in 2021. Ms. Nordby  
4 concentrates her practice on complex civil litigation, including consumer protection, and wage  
5 and hour class actions. Ms. Nordby also litigates commercial disputes and matters involving  
6 trusts and estates. Ms. Nordby received her J.D. from the University of Washington in 2021.  
7 During law school Ms. Nordby served as Executive Managing Editor of the Washington Journal  
8 of Environmental Law and Policy. She received the WSBA Labor & Employment Section 2019  
9 Summer Grant for her public service work and commitment to labor and employment issues.  
10 Ms. Nordby is trained as a mediator and has successfully mediated a number of individual civil  
11 matters through the UW School of Law Mediation Clinic. Before joining the firm as an attorney,  
12 Ms. Nordby was a senior paralegal at Terrell Marshall from the time the firm opened in 2008  
13 until starting law school in 2018.

14 8. Sarah Smith was an associate with Terrell Marshall from April 2021 to 2022. Ms.  
15 Smith concentrated her practice on complex civil litigation, including the prosecution of  
16 consumer and employment class actions. Ms. Smith received her J.D. from the University of  
17 Washington, graduating with honors in 2019. Before joining Terrell Marshall, Ms. Smith served  
18 as law clerk to the Honorable Stanley A. Bastian in the Eastern District of Washington.

19 9. Law Clerks at Terrell Marshall including time keepers Charity Chen (CC), Beth  
20 Kidd (BK), James Stafford (JS), and Grace Wan (GW) were second or third year students at  
21 either the University of Washington or Seattle University when they performed work on this  
22 matter. Terrell Marshall law clerks are trained to perform tasks assigned to them and closely  
23 supervised by practicing attorneys in the firm. They are paid on an hourly basis.

24 **C. Other cases litigated by Terrell Marshall.**

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

- 1 a. *Gold, et al. v. Lumber Liquidators, Inc.*—Filed in 2014 on behalf  
2 of a class of consumers who purchased defective flooring. The  
3 Northern District of California granted final approval of the  
4 settlement, valued at up to \$30 million, on October 22, 2020.
- 5 b. *Van Fleet v. Trion Worlds, Inc.*—Filed in 2015 on behalf of a  
6 nationwide class of online video game players deprived of a  
7 promised discount on purchases of virtual goods and who  
8 participated in an alleged illegal lottery. The San Mateo County  
9 Superior Court granted final approval of a \$420,000 settlement  
10 on June 1, 2020.
- 11 c. *Wornicki v. BrokerPriceOpinion.com*—Filed in 2013 on behalf of  
12 a nationwide class of people who provided home valuations,  
13 known as broker price opinions, but who were not paid for the  
14 opinions as promised. The District of Colorado granted final  
15 approval of a settlement of more than \$1.5 million on  
16 September 20, 2018.
- 17 d. *Jordan v. Nationstar Mortgage, LLC*—Filed in 2012 on behalf of  
18 Washington homeowners who were improperly locked out of  
19 their homes by their mortgage lender. The Eastern District of  
20 Washington granted final approval of a \$17 million settlement  
21 on May 2, 2019.
- 22 e. *Carrillo v. Wells Fargo Bank, N.A.*—Filed in 2018 on behalf of  
23 borrowers who allege Wells Fargo charged them interest rates  
24 on residential loans that were higher than the rates disclosed in  
25 the bank’s buydown agreements and closing disclosures. The  
26 case is currently pending in the Eastern District of New York.
- 27 f. *Long v. First Resolution Investment Corp.*—Filed in 2018 on  
behalf of Washington consumers against whom a debt buyer  
and its collection agency law firm obtained judgments when the  
debt buyer was not licensed as a collection agency. The King  
County Superior Court granted final approval of a settlement  
providing over \$20 million in debt relief and \$600,000 on  
August 28, 2020.

11. Examples of Fair Credit Reporting Act class actions that Terrell Marshall is  
litigating or has litigated to successful completion include:

- a. *Gambles et al. v. Sterling Infosystems, Inc.*—Filed in 2015 on  
behalf of a nationwide class of consumers who were affected by  
Sterling’s inclusion of outdated adverse information on consumer

1 reports. The Southern District of New York granted final approval  
2 to a \$15 million class settlement on September 23, 2020.

3 b. *Rosario v. Starbucks*—Filed in 2016 on behalf of job applicants who  
4 were affected by Starbucks' failure to provide notice before taking  
5 adverse action. On July 15, 2020, the Northern District of Georgia  
6 granted final approval of the settlement which provides class  
7 members up to \$8 million in benefits.

8 c. *Leo v. Appfolio, Inc.*—Filed in 2017 on behalf of consumers who  
9 were affected by Appfolio's matching procedures that resulted in  
10 incorrect information being included on consumer reports and  
11 Appfolio's failure to provide consumers with required information  
12 about the sources any inaccuracies. The Western District of  
13 Washington granted final approval of the \$4.5 million settlement  
14 on July 18, 2019.

15 d. *Dougherty v. Barrett Business Services, Inc.*—Filed in 2016 on  
16 behalf of job applicants who were affected by BBSI's failure to  
17 provide required disclosures before procuring criminal  
18 background reports. The Clark County Superior Court granted final  
19 approval of the \$1.5 million settlement on November 8, 2019.

20 e. *Terrell v. Costco Wholesale Corp.*—Filed in 2016 on behalf of  
21 applicants and employees who were affected by Costco's failure  
22 to provide required disclosures before procuring criminal  
23 background reports. The King County Superior Court granted final  
24 approval of the \$2.49 million settlement on June 15, 2018.

25 f. *Connolly v. Umpqua Bank*—Filed in 2015 on behalf of applicants  
26 and employees who were affected by Umpqua's failure to provide  
27 required disclosures before procuring criminal background  
28 reports and before taking adverse action based on such reports.  
29 The Western District of Washington granted final approval of the  
30 \$325,000 settlement on February 28, 2019.

31 12. Additional information about class actions litigated by Terrell Marshall is  
32 available on our website [www.terrellmarshall.com](http://www.terrellmarshall.com).

1 **D. The prosecution of this action.**

2 13. Mr. Proudlove's response to Gantz and Tussy's summary judgment motion relied  
3 heavily on emails that Class Counsel obtained by paying the ESI consultant Defendants had  
4 earlier used to gather and produce documents to the FTC

5 14. Plaintiff deposed Mr. Gantz, Mr. Tussy, and Seed's former bookkeeper.

6 15. Defendants deposed Plaintiff and five other absent class members expected to  
7 testify at trial.

8 16. Plaintiff's forensic accounting expert analyzed the financial records produced by  
9 defendants and third parties.

10 17. Plaintiff Douglas Proudlove has made significant efforts on behalf of the class. He  
11 assisted Class Counsel with our investigation of the claims, monitored the litigation for more  
12 than two years, and sat for a deposition.

13 18. Since the beginning of this case, Terrell Marshall has worked with no guarantee  
14 of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always  
15 been contingent on successfully obtaining relief for the Class Representatives and Class  
16 Members. Terrell Marshall has advanced all costs of this litigation other than travel costs  
17 advanced by Mr. Arons. As a result, there was a substantial risk of non-payment, particularly in  
18 light of the challenges inherent in this type of case. Work on this case has necessarily been to  
19 the exclusion of work on other matters that likely would have generated fees. Terrell Marshall  
20 has also been denied use of the fees it earned over the course of this case.

21 19. Attached as Exhibit 1 are contemporaneous, daily time reports reflecting the  
22 work of Terrell Marshall's attorneys and staff on this matter. These records are prepared and  
23 maintained by Terrell Marshall in the regular course of business. All entries in red have been  
24 excluded from Terrell Marshall's lodestar calculation, including time for which Class Counsel  
25 was awarded fees as a result of Mr. Proudlove's successful motion for discovery sanctions. After  
26 those deductions, Terrell Marshall has a lodestar of \$653,924 in reasonable attorneys' fees  
27 incurred for over 1900 hours of work.

1           20.     The work performed by paralegals was work that I or attorney would have had  
2 to perform absent such assistance. In the case of Jessica Langsted and Jodi Nuss, the work  
3 included analysis of Defendants' documents and QuickBooks files that required an  
4 understanding of the facts and claims at issue in the case and was important to the  
5 development of those facts and claims. All of these staff members are qualified to perform  
6 substantive legal work based on their training and past experience working for attorneys.

7           21.     I anticipate the firm will incur additional fees in relation to the approval and  
8 settlement administration process. I will ensure that Plaintiffs' motion for Attorneys' Fees,  
9 Costs, and Service Awards and all supporting records including this declaration are posted on  
10 the settlement website within one business day of filing it with the Court.

11          22.     The lodestar calculations of Class Counsel are based on reasonable hourly rates.  
12 Class Counsel set their rates for attorneys and staff members based on a variety of factors,  
13 including among others: the experience, skill and sophistication required for the types of legal  
14 services typically performed; the rates customarily charged in the markets where legal services  
15 are typically performed; and the experience, reputation and ability of the attorneys and staff  
16 members.

17          23.     Terrell Marshall has incurred out-of-pocket litigation expenses totaling  
18 \$44,628.51, to cover expenses related to investigation, filing fees, service of process fees, fees  
19 charged by defendants electronic discovery vendor to obtain documents produced to the FTC,  
20 mediation fees, and expert costs. The following chart summarizes Terrell Marshall's litigation  
21 costs:

Category of Expense	Total
Service of Process	\$3,050.75
Court Reporting	\$6,770.76
Delivery of Working Copies	\$30.76



Category of Expense	Total
Mediation	\$1,750.00
Transcripts	\$10,786.83
Investigator Fees (witness identification)	\$3,000.00
Filing Fees	\$1,069.72
Expert Fees	\$16,269.75
Class Notice Costs	\$48.49
Postage	\$62.05
Travel	\$202.50
Document Production Costs	\$1,586.90
<b>TOTAL</b>	<b>\$44,628.51</b>

24. Attached hereto as Exhibit 2 is the Final Approval Order and Judgment in *Long v. First Resolution Investment Corp.*, No. 19-2-11281-6 SEA, Final Approval Order and Judgment (King Cnty. Sup. Ct. Aug. 28, 2020).

25. Attached hereto as Exhibit 3 is the Order Granting Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement and Award of Attorneys' Fees, Costs and Service Award in *Strong v. Numerica Credit Union*, No. 17-2-01406-39 (Yakima Cnty. Sup. Ct. Feb. 14, 2020) (awarding one-third of fund)).

26. Attached hereto as Exhibit 4 is the Final Approval Order and Entry of Judgment in *Dougherty v. Barrett Business Servs., Inc.*, No. 17-2-05619-1 (Clark Cnty. Sup. Ct. Nov. 8, 2019) (awarding one-third of fund)).

27. Attached hereto as Exhibit 5 is the Order Approving Award of Attorneys' Fees and Costs in *Terrell v. Costco Wholesale Corp.*, No. 16-2-19140-1 SEA (King Cnty. Sup. Ct. June 19, 2018) (awarding one-third of fund).

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

I declare under penalty of perjury of the laws of the United States and the State of Washington that the foregoing is true and correct.

EXECUTED at Seattle, Washington and DATED this 17th day of November, 2022.

By: /s/ Blythe H. Chandler, WSBA #43387  
Blythe H. Chandler, WSBA #43387

- Exhibit 1 -

**Terrell Marshall Law Group PLLC**  
***Proudlove v. Seed Capital - KC - JP***  
**Matter 2381-001**

<b>Date</b>	<b>Initials</b>	<b>Narrative</b>	<b>Units</b>	<b>Rate</b>	<b>Value</b>
2/1/2021	AMS	Strategy conference regarding class certification motion [.3]; reviewed draft motion and revised, related research [7.5].	7.8	\$ 550.00	\$ 4,290.00
2/4/2021	AMS	Worked on class certification motion, related research [3.1].	3.1	\$ 550.00	\$ 1,705.00
3/25/2021	AMS	Reviewed and analyzed motion to dismiss [1.5].	1.5	\$ 550.00	\$ 825.00
4/1/2021	AMS	Strategy conference regarding discovery issues [0.3].	0.3	\$ 550.00	\$ 165.00
4/8/2021	AMS	Strategy conference regarding responding to motion to dismiss [0.5]; reviewed and analyzed motion, related research [4.2].	4.7	\$ 550.00	\$ 2,585.00
4/12/2021	AMS	Worked on response to motion to dismiss, related research [3.3].	3.3	\$ 550.00	\$ 1,815.00
4/13/2021	AMS	Worked on response to motion to dismiss, related research [7.1].	7.1	\$ 550.00	\$ 3,905.00
4/14/2021	AMS	Worked on response to motion to dismiss, related research [8.5].	8.5	\$ 550.00	\$ 4,675.00
4/15/2021	AMS	Revised default motion, related research [2.3]; worked on response to motion to dismiss, related research [4.8].	7.1	\$ 550.00	\$ 3,905.00
4/16/2021	AMS	Worked on response to motion to dismiss, related research [5.6]; revised default motion, related research [3.2]; email with Mr. Arons [0.5].	9.3	\$ 550.00	\$ 5,115.00
4/19/2021	AMS	Worked on response to motion to dismiss, related research [4.3]; email with team regarding default motion [0.7]; telephone conference with Mr. Leonard [0.3]; revised default motion [3.5].	8.8	\$ 550.00	\$ 4,840.00
4/20/2021	AMS	Revised motion for default and sanctions and supporting declaration [3.2]; worked on response to motion to dismiss [5.5]; multiple emails with Mr. Arons [0.8]; strategy conferences [0.6].	10.1	\$ 550.00	\$ 5,555.00
4/21/2021	AMS	Worked on revisions to response to motion to dismiss [3.6]; finalized motion for entry of default and sanctions [2.4].	6	\$ 550.00	\$ 3,300.00
4/22/2021	AMS	Worked on response to motion to dismiss and supporting declaration, email with Mr. Arons [3.5].	3.5	\$ 550.00	\$ 1,925.00
4/23/2021	AMS	Worked on response to motion to dismiss and supporting declaration, worked on evidentiary issues, email with Mr. Arons [7.2].	7.2	\$ 550.00	\$ 3,960.00

Date	Initials	Narrative	Units	Rate	Value
4/26/2021	AMS	Worked on response to motion to dismiss and supporting declaration [3.2]; worked on research regarding Seed employees and email with Mr. Arons [.3].	3.5	\$ 550.00	\$ 1,925.00
4/28/2021	AMS	Worked on response to motion for protective order [2.5].	2.5	\$ 550.00	\$ 1,375.00
5/4/2021	AMS	Reviewed reply to motion to dismiss [.5]; conference regarding motion to dismiss hearing [.8].	1.3	\$ 550.00	\$ 715.00
5/6/2021	AMS	Strategy conferences regarding argument on motion to dismiss [1.2]; worked on questions for potential evidentiary hearing [1.0].	2.2	\$ 550.00	\$ 1,210.00
8/16/2021	AMS	Strategy conference regarding document review [.5].	0.5	\$ 550.00	\$ 275.00
8/18/2021	AMS	Strategy conference regarding document review [0.5].	0.5	\$ 550.00	\$ 275.00
8/27/2021	AMS	Strategy conference regarding document productions [0.5].	0.5	\$ 550.00	\$ 275.00
9/13/2021	AMS	Strategy conference regarding class certification [0.2]; reviewed documents and worked on class certification motion [1.7].	1.9	\$ 550.00	\$ 1,045.00
9/14/2021	AMS	Reviewed documents and worked on class certification motion [6.8].	6.8	\$ 550.00	\$ 3,740.00
9/15/2021	AMS	Reviewed documents and worked on class certification motion [8.4].	8.4	\$ 550.00	\$ 4,620.00
9/16/2021	AMS	Reviewed documents and worked on class certification motion, drafted Proudlove declaration, strategy conference, email with co-counsel [7.6].	7.6	\$ 550.00	\$ 4,180.00
9/17/2021	AMS	Worked on revisions to class certification motion, strategy conference, worked on declaration in support and exhibits [3.3].	3.3	\$ 550.00	\$ 1,815.00
9/20/2021	AMS	Worked on revisions to class certification motion, worked on supporting documents [2.3].	2.3	\$ 550.00	\$ 1,265.00
9/21/2021	AMS	Worked on class certification motion and supporting declarations and exhibits, email with co-counsel [2.3].	2.3	\$ 550.00	\$ 1,265.00
9/22/2021	AMS	Worked on class certification motion and exhibits [2.5].	2.5	\$ 550.00	\$ 1,375.00
9/23/2021	AMS	Worked on finalizing class certification motion, declarations in support, and exhibits, related strategy conferences [6.8].	6.8	\$ 550.00	\$ 3,740.00
9/27/2021	AMS	Revised proposed order for submission to court [1.0].	1	\$ 550.00	\$ 550.00
9/28/2021	AMS	Strategy conferences regarding preparation for Gantz deposition [0.3].	0.3	\$ 550.00	\$ 165.00
9/29/2021	AMS	Reviewed documents and compiled deposition exhibits [4.6].	4.6	\$ 550.00	\$ 2,530.00

Date	Initials	Narrative	Units	Rate	Value
9/30/2021	AMS	Analyzed opposition to class certification, strategy conference, and worked on reply [4.5].	4.5	\$ 550.00	\$ 2,475.00
10/1/2021	AMS	Worked on class certification reply [8.6].	8.6	\$ 550.00	\$ 4,730.00
10/2/2021	AMS	Worked on class certification reply, declaration in support, and revised proposed order [3.3].	3.3	\$ 550.00	\$ 1,815.00
10/3/2021	AMS	Worked on class certification reply and declaration in support [2.6].	2.6	\$ 550.00	\$ 1,430.00
10/4/2021	AMS	Finalized class certification reply and declaration and exhibits, email to defense counsel regarding redacted exhibits, email to Mr. Leonard [2.5].	2.5	\$ 550.00	\$ 1,375.00
10/5/2021	AMS	Reviewed defendants' surreply and drafted response, related research [3.5].	3.5	\$ 550.00	\$ 1,925.00
1/19/2022	AMS	Reviewed briefing on defendants' summary judgment motion in preparation for drafting summary judgment motion [2.3].	2.3	\$ 550.00	\$ 1,265.00
1/20/2022	AMS	Worked on summary judgment motion [2.6].	2.6	\$ 550.00	\$ 1,430.00
1/21/2022	AMS	Worked on summary judgment motion, related research and strategy conference [5.8].	5.8	\$ 550.00	\$ 3,190.00
1/24/2022	AMS	Worked on summary judgment motion [7.5].	7.5	\$ 550.00	\$ 4,125.00
1/25/2022	AMS	Worked on summary judgment motion, related research [4.5].	4.5	\$ 550.00	\$ 2,475.00
1/27/2022	AMS	Worked on summary judgment motion [1.5].	1.5	\$ 550.00	\$ 825.00
1/28/2022	AMS	Worked on summary judgment motion [6.5].	6.5	\$ 550.00	\$ 3,575.00
1/30/2022	AMS	Worked on summary judgment motion [2.4].	2.4	\$ 550.00	\$ 1,320.00
1/31/2022	AMS	Worked on summary judgment motion [8.3]; worked on revisions and circulated to team [1.2].	9.5	\$ 550.00	\$ 5,225.00
2/1/2022	AMS	Worked on revisions to motion for summary judgment, related emails [3.2].	3.2	\$ 550.00	\$ 1,760.00
2/2/2022	AMS	Worked on motion for summary judgment, declaration in support, and proposed order [5.6].	5.6	\$ 550.00	\$ 3,080.00
2/3/2022	AMS	Worked on revisions to summary judgment motion, declaration and exhibits, and proposed order, email with Mr. Arons [7.9].	7.9	\$ 550.00	\$ 4,345.00
2/4/2022	AMS	Finalized summary judgment motion and supporting documents, email with Mr. Leonard [4.5].	4.5	\$ 550.00	\$ 2,475.00
2/22/2022	AMS	Worked on mediation statement [5.2].	5.2	\$ 550.00	\$ 2,860.00

Date	Initials	Narrative	Units	Rate	Value
2/23/2022	AMS	Worked on mediation statement [0.5]; worked on summary judgment reply, related research, strategy conference, and email with co-counsel [7.8].	8.3	\$ 550.00	\$ 4,565.00
2/24/2022	AMS	Worked on summary judgment reply, related research, email with Mr. Arons [9.1].	9.1	\$ 550.00	\$ 5,005.00
2/25/2022	AMS	Worked on summary judgment reply, related research [8.4].	8.4	\$ 550.00	\$ 4,620.00
2/27/2022	AMS	Worked on summary judgment reply [2.2]; revised mediation statement [0.7]; further edits to brief and email with team [0.8].	3.7	\$ 550.00	\$ 2,035.00
2/28/2022	AMS	Worked on summary judgment reply, related emails with team [1.2]; worked on mediation statement and exhibits [2.0]; finalized summary judgment reply [1.1].	4.3	\$ 550.00	\$ 2,365.00
3/1/2022	AMS	Finalized mediation statement and exhibit list [1.0],	1	\$ 550.00	\$ 550.00
3/3/2022	AMS	Prepared for and participated in moot for summary judgment hearing [2.0].	2	\$ 550.00	\$ 1,100.00
3/14/2022	AMS	Worked on jury instructions [6.2].	6.2	\$ 550.00	\$ 3,410.00
3/16/2022	AMS	Worked on jury instructions, related research [4.1].	4.1	\$ 550.00	\$ 2,255.00
9/21/2022	AMS	Analyzed Gintz's motion to decertify and worked on response [3.3].	3.3	\$ 550.00	\$ 1,815.00
9/26/2022	AMS	Worked on response to decertification motion, related research [8.8].	8.8	\$ 550.00	\$ 4,840.00
			<b>300.3</b>		<b>\$ 165,165.00</b>
8/24/2021	AA	Attended declarations meeting; reviewed case memo; reviewed list.	1	\$ 125.00	\$ 125.00
8/31/2021	AA	Followed up on PC emails; responded to emails.	0.5	\$ 125.00	\$ 62.50
9/8/2021	AA	Followed up on emails sent; sent new emails requesting meeting; updated spreadsheet with results.	0.5	\$ 125.00	\$ 62.50
12/23/2021	AA	Worked on BHC declaration iso SJ; worked on proposed order.	2	\$ 125.00	\$ 250.00
12/27/2021	AA	Worked on response to defendants motion to compel; worked on ELN declaration.	2	\$ 125.00	\$ 250.00
1/3/2022	AA	Worked on supplemental declaration; filed with king county.	3	\$ 125.00	\$ 375.00
1/14/2022	AA	Ordered copy of audio of the court's oral ruling for the motion for summary judgement; sent the audio to the transcriptionist.	1	\$ 125.00	\$ 125.00

Date	Initials	Narrative	Units	Rate	Value
1/19/2022	AA	Worked on motion for summary judgement, BHC declaration and proposed order.	2	\$ 125.00	\$ 250.00
1/27/2022	AA	Completed mediation notice and sent to administrator.	0.5	\$ 125.00	\$ 62.50
2/3/2022	AA	Finalized class member declarations.	3	\$ 125.00	\$ 375.00
2/4/2022	AA	Worked on notice of hearing and declaration of service.	1	\$ 125.00	\$ 125.00
2/22/2022	AA	Worked on SJ reply and BHC declaration in support.	2	\$ 125.00	\$ 250.00
4/21/2022	AA	Worked on letter to counsel regarding discovery conference.	2	\$ 125.00	\$ 250.00
6/21/2022	AA	Ordered clerk minutes and hearing recording.	0.5	\$ 125.00	\$ 62.50
7/26/2022	AA	Worked on motion to modify an order, BHC declaration, and proposed order.	1	\$ 125.00	\$ 125.00
7/27/2022	AA	Worked on discovery letter.	0.5	\$ 125.00	\$ 62.50
7/28/2022	AA	Finalized preservation letter and served; worked on Feoli letter.	1	\$ 125.00	\$ 125.00
8/10/2022	AA	Worked on Reply iso Mtn to Clarify and declaration.	1	\$ 125.00	\$ 125.00
			<b>24.5</b>		<b>\$ 3,062.50</b>
12/20/2021	BMD	Reviewed file, worked on motion to compel, analyzed issues regarding filing requirements [5.5].	5.5	\$ 375.00	\$ 2,062.50
12/21/2021	BMD	Reviewed deposition transcripts, worked on motion to compel, finalized same [6.1].	6.1	\$ 375.00	\$ 2,287.50
9/28/2022	BMD	Continued research regarding [REDACTED] claims [1].	1	\$ 375.00	\$ 375.00
			<b>12.6</b>		<b>\$ 4,725.00</b>
5/6/2020	BET	Telephone call with Mr. Arons regarding strategy for class case against Seed Capital.	0.5	\$ 550.00	\$ 275.00
5/14/2020	BET	Telephone call with co-counsel regardign draft complaint [.7]. Worked on complaint; email to Mr. Arons regarding same [.5]	1.2	\$ 550.00	\$ 660.00
5/18/2020	BET	Personal meeting with Ms. Chandler regarding work on complaint [.2].	1.4	\$ 550.00	\$ 770.00
8/7/2020	BET	Read and analyzed draft complaint and related statutes [1.2].	1	\$ 550.00	\$ 550.00
8/24/2020	BET	Reviewed defendants' motion to dismiss [1]	0.5	\$ 550.00	\$ 275.00
9/1/2020	BET	Reviewed response to motion to dismiss and supporting declarations [.5]	0.5	\$ 550.00	\$ 275.00
			0.5	\$ 550.00	\$ 275.00



Date	Initials	Narrative	Units	Rate	Value
9/3/2020	BET	Prepared for and participated in moot argument regarding defendants' motion to dismiss [2.5]	2	\$ 550.00	\$ 1,100.00
11/20/2020	BET	Reviewed settlement demand letter [.3]	0.3	\$ 550.00	\$ 165.00
4/26/2021	BET	Reviewed response to dismiss first amended complaint [.5]	0.5	\$ 550.00	\$ 275.00
5/6/2021	BET	Moot argument regarding defendant motion to dismiss first amended complaint [2]	2	\$ 550.00	\$ 1,100.00
8/26/2021	BET	Discussed settlement offer from defense counsel with Ms. Chandler [.3]	0.3	\$ 550.00	\$ 165.00
9/23/2021	BET	Reviewed and revised motion for class certification [1]	1	\$ 550.00	\$ 550.00
10/1/2021	BET	Strategized with Ms. Chandler regarding Gantz deposition [.2]	0.2	\$ 550.00	\$ 110.00
10/4/2021	BET	Reviewed reply in support of motion for class certification [.5]. Prepared for Gantz deposition [6.4].	6.9	\$ 550.00	\$ 3,795.00
10/5/2021	BET	Discussed Gantz deposition with co-counsel [.5]. Prepared for Gantz deposition [2.5]. Deposition of Gantz [8.5]; follow up discussion with co-counsel regarding same [.1].	11.6	\$ 550.00	\$ 6,380.00
10/6/2021	BET	Discussed Tussy deposition and exhibits with co-counsel [.5].	0.5	\$ 550.00	\$ 275.00
10/7/2021	BET	Prepared for Kevin Tussy deposition [1]; attended Tussy deposition [4.6]	5.6	\$ 550.00	\$ 3,080.00
11/17/2021	BET	Worked on motion to approve class notice [.3]	0.3	\$ 550.00	\$ 165.00
12/27/2021	BET	Reviewed and revised response to defendants' motion for summary judgment [.5]	0.5	\$ 550.00	\$ 275.00
1/6/2022	BET	Prepared for and participated in moot argument regarding defendants' motion for summary judgment [2]	2	\$ 550.00	\$ 1,100.00
2/4/2022	BET	Reviewed motion for summary judgment [1]	1	\$ 550.00	\$ 550.00
2/28/2022	BET	Reviewed reply in support of motion for summary judgment [.5]	0.5	\$ 550.00	\$ 275.00
3/1/2022	BET	Worked on mediation statement [1]	1	\$ 550.00	\$ 550.00
3/3/2022	BET	Prepared for and participated in moot argument regarding plaintiff's motion for summary judgment [2]	2	\$ 550.00	\$ 1,100.00
3/7/2022	BET	Prepared for mediation [2]	2	\$ 550.00	\$ 1,100.00
3/8/2022	BET	Prepared for and participated in mediation [4.2]	4.2	\$ 550.00	\$ 2,310.00
3/11/2022	BET	Discussed jury demand with Ms. Chandler [.2]	0.2	\$ 550.00	\$ 110.00

Date	Initials	Narrative	Units	Rate	Value
6/7/2022	BET	Telephone call with Ms. Chandler regarding reply supporting motion for sanctions [.1]	0.1	\$ 550.00	\$ 55.00
6/17/2022	BET	Discussed case management with Ms. Chandler. [.2]	0.2	\$ 550.00	\$ 110.00
6/28/2022	BET	Read and analyzed summary judgment hearing transcript [.5]; discussed same with Ms. Chandler. [.2]	0.7	\$ 550.00	\$ 385.00
6/29/2022	BET	Reviewed documents for potential trial exhibits [.8]. Video conference with co-counsel regarding case management [1.5]; discussed same with Ms. Chandler [.4].	2.7	\$ 550.00	\$ 1,485.00
7/7/2022	BET	Meeting with Ms. Chandler regarding case management [.8]	0.8	\$ 550.00	\$ 440.00
7/11/2022	BET	Wrote outline for absent class member interviews; sent same to co-counsel [1.5]	1.5	\$ 550.00	\$ 825.00
7/12/2022	BET	Prepared for interviews with absent class members [.9]. Videoconferences with Ms. Neil [1]. Video conference with Ms. Barrett [1]; discussed same with co-counsel [.5].	2.4	\$ 550.00	\$ 1,320.00
7/13/2022	BET	Video conference with co-counsel regarding case management [1]. Interview with potential witness Jurgemeyer [.6]; follow up discussion with co-counsel regarding same [.2].	1.8	\$ 550.00	\$ 990.00
7/26/2022	BET	Interview with absent class member Hills [.5].	0.5	\$ 550.00	\$ 275.00
7/28/2022	BET	Videoconference with class member Wills [.5]. Video conference with class member Fields [.4].	0.9	\$ 550.00	\$ 495.00
8/1/2022	BET	Completed work on proposed order clarifying default and summary judgment order and motion for entry of same [3.8]. Commenced drafting direct examination of Erik Gantz [1.5].	5.3	\$ 550.00	\$ 2,915.00
8/3/2022	BET	Final revisions to motion to clarify order; sent same to staff to finalize for filing [.5]. Exchanged emails and telephone calls with co-counsel regarding deposition scheduling for Tussy and absent class members [.4].	0.9	\$ 550.00	\$ 495.00
8/8/2022	BET	Personal meeting with Ms. Chandler regarding deposition and discovery management [.3].	0.3	\$ 550.00	\$ 165.00

Date	Initials	Narrative	Units	Rate	Value
8/10/2022	BET	Reviewed response to Tussy's motion for protective order [.3]; read and analyzed Gintz's response to motion to clarify; discussed same with Ms. Chandler [.9].	1.2	\$ 550.00	\$ 660.00
8/16/2022	BET	Telephone call with Ms. Chandler regarding videoconference with Ms. Jurgemeyer [.1].	0.1	\$ 550.00	\$ 55.00
8/17/2022	BHC	Meeting with Ms. Barrett in advance of deposition [.5]. Defended deposition of Ms. Barrett [2.5]. Attended Ms. Wills' deposition [3.1].	6.1	\$ 550.00	\$ 3,355.00
8/18/2022	BET	Discussed Ms. Wills' deposition with Ms. Chandler [.2]	0.2	\$ 550.00	\$ 110.00
8/19/2022	BET	Discussed written settlement demand with Ms. Chandler [.2].	0.2	\$ 550.00	\$ 110.00
8/24/2022	BET	Discussed Ms. Hills deposition and legal research with Ms. Chandler [.3].	0.3	\$ 550.00	\$ 165.00
8/31/2022	BET	Videoconference with experts [1]	1	\$ 550.00	\$ 550.00
9/6/2022	BET	Read and analyzed court's orders on motions to clarify and for protective order [.3]; discussed defendants' failure to produce all financial records with Ms. Chandler [.2].	0.5	\$ 550.00	\$ 275.00
9/13/2022	BET	Telephone call with Ms. Chandler regarding case schedule [.5]	0.5	\$ 550.00	\$ 275.00
9/15/2022	BET	Reviewed and revised response to motion to bifurcate [.4]. Personal meeting with Ms. Chandler regarding case management [.5]	0.9	\$ 550.00	\$ 495.00
9/16/2022	BET	Worked on witness time form [.2].	0.2	\$ 550.00	\$ 110.00
9/17/2022	BET	Telephone conference with Ms. Chandler regarding jury instructions, proposed conclusions of law, proposed findings of facts, and motion to strike experts [.5]; reviewed motion to strike [.5]	1	\$ 550.00	\$ 550.00
9/19/2022	BET	Discussed response to motion for protective order with Ms. Chandler [.2].	0.2	\$ 550.00	\$ 110.00
9/22/2022	BET	Reviewed response to motion to strike expert [.5]; reviewed motion to decertify class [.5]	1	\$ 550.00	\$ 550.00

Date	Initials	Narrative	Units	Rate	Value
9/23/2022	BET	Discussed expert opinions with Ms. Chandler [.4] reviewed defendants' offer of judgment [.3]; reviewed response to defendants' motion to strike [.5]; further analyzed motion to decertify class [.5]	1.7	\$ 550.00	\$ 935.00
9/24/2022	BET	Telephone call with Ms. Chandler regarding offer of judgment [.3]	0.3	\$ 550.00	\$ 165.00
9/25/2022	BET	Meeting with experts regarding Feoli deposition [1]; worked on Feoli deposition preparation [4.5]	5.5	\$ 550.00	\$ 3,025.00
9/26/2022	BET	Prepared for Feoli deposition [2]; took Feoli deposition [6.5]	8.5	\$ 550.00	\$ 4,675.00
9/27/2022	BET	Worked on outline for Gantz deposition [2]; worked on responses to defendant Erik Gintz's motions in limine [1]; settlement discussions with counsel [3]	6	\$ 550.00	\$ 3,300.00
9/28/2022	BET	Settlement discussions with counsel. [3]. Revised settlement agreement and worked with all counsel on finalizing terms of same [4].	7	\$ 550.00	\$ 3,850.00
			<b>108.5</b>		<b>\$ 60,610.00</b>
7/5/2022	BK	Jury instructions research project [6]	6	\$ 200.00	\$ 1,200.00
7/6/2022	BK	Docket research project [8]	8	\$ 200.00	\$ 1,600.00
7/7/2022	BK	Research project [8]	8	\$ 200.00	\$ 1,600.00
8/19/2022	BK	CSOA research [8]	8	\$ 200.00	\$ 1,600.00
8/24/2022	BK	CSOA research project [7]	7	\$ 200.00	\$ 1,400.00
8/25/2022	BK	CSOA research [6.5]	6.5	\$ 200.00	\$ 1,300.00
8/29/2022	BK	CSOA research [8]	8	\$ 200.00	\$ 1,600.00
8/30/2022	BK	CSOA research memo [8]	8	\$ 200.00	\$ 1,600.00
			<b>59.5</b>		<b>\$ 11,900.00</b>
5/18/2020	BHC	Personal meeting with Ms. Terrell regarding work on complaint [.2]. Read and analyzed draft complaint and related statutes [1.2]. Worked on draft complaint [1.5].	2.9	\$ 450.00	\$ 1,305.00
5/19/2020	BHC	Worked on complaint.	4.9	\$ 450.00	\$ 2,205.00
5/20/2020	BHC	Worked on complaint and sent to staff for formatting; approved same for filing [1.2].	1.2	\$ 450.00	\$ 540.00
5/21/2020	BHC	Worked on complaint [3.5].	3.5	\$ 450.00	\$ 1,575.00

Date	Initials	Narrative	Units	Rate	Value
5/22/2020	BHC	Worked on complaint; reviewed and approved all documents for filing [1.5].	1.5	\$ 450.00	\$ 675.00
5/26/2020	BHC	Exchanged emails with staff regarding service of summons and complaint [1].	0.1	\$ 450.00	\$ 45.00
6/9/2020	BHC	Worked on Plaintiff's first set of discovery requests [1.5].	1.5	\$ 450.00	\$ 675.00
6/10/2020	BHC	Worked on Plaintiff's First Set of Discovery Requests [2.5].	2.5	\$ 450.00	\$ 1,125.00
6/11/2020	BHC	Worked on Plaintiff's discovery requests [.5].	0.5	\$ 450.00	\$ 225.00
6/15/2020	BHC	Reviewed final versions of discovery requests and approved same for service [.3].	0.3	\$ 450.00	\$ 135.00
6/17/2020	BHC	Reviewed and approved subpoena topics proposed by co-counsel; sent project to staff to set up subpoenas to client credit card issuers [.6].	0.6	\$ 450.00	\$ 270.00
6/18/2020	BHC	Worked with staff on subpoenas to client credit card issuers [.6].	0.6	\$ 450.00	\$ 270.00
7/1/2020	BHC	Worked on email to credit card issuers regarding Seed's letter objection to subpoenas [.3].	0.3	\$ 450.00	\$ 135.00
7/2/2020	BHC	Reviewed messages from credit card company regarding subpoena response [1].	1	\$ 450.00	\$ 450.00
7/14/2020	BHC	Worked on Plaintiff's first set of requests for admission [1.3]; reviewed and approved same for service; exchanged emails with staff regarding same [.3].	1.6	\$ 450.00	\$ 720.00
7/15/2020	BHC	Exchanged emails with staff regarding subpoena response management [.2].	0.2	\$ 450.00	\$ 90.00
7/16/2020	BHC	Exchanged emails with Mr. Sanders regarding meet and confer [.1]; exchanged emails with co-counsel regarding case status [.2]; exchanged emails with staff regarding subpoena responses [.2].	0.5	\$ 450.00	\$ 225.00
7/17/2020	BHC	Responded to inquiry regarding Bank of America and American Express subpoenas [.2].	0.2	\$ 450.00	\$ 90.00
7/20/2020	BHC	Responded to filing and case related emails [.1].	0.1	\$ 450.00	\$ 45.00
7/21/2020	BHC	Received and reviewed subpoena response materials and sent to co-counsel [.2].	0.2	\$ 450.00	\$ 90.00
7/22/2020	BHC	Meet and confer with Mr. Sanders regarding defendant's request for discovery stay [.3]; follow up call with co-counsel regarding same [.2].	0.5	\$ 450.00	\$ 225.00

Date	Initials	Narrative	Units	Rate	Value
7/28/2020	BHC	Downloaded secure production file from credit card issuer and sent to staff for processing [.1].	0.1	\$ 450.00	\$ 45.00
7/29/2020	BHC	Email correspondence with Mr. Sanders regarding discovery agreements [.2].	0.2	\$ 450.00	\$ 90.00
8/10/2020	BHC	Exchanged emails with co-counsel regarding briefing schedule on motion to dismiss [.2]. Legal research regarding defendant's motion to dismiss [3]. Telephone conference with co-counsel regarding discovery and response to motion to dismiss [.5]. Reviewed and approved meet and confer letter [.2].	3.2	\$ 450.00	\$ 1,440.00
8/11/2020	BHC		0.7	\$ 450.00	\$ 315.00
8/17/2020	BHC	Legal research regarding response to motion to dismiss [1.5].	1.5	\$ 450.00	\$ 675.00
8/18/2020	BHC	Legal research regarding motion to dismiss response [3.5]; email to co-counsel regarding getting client declaration in support of response brief [.2].	3.7	\$ 450.00	\$ 1,665.00
8/19/2020	BHC	Reviewed all discovery responses and documents produced by Seed to identify evidence supporting response to motion to dismiss [2.5]. Legal research related to response to motion to dismiss [4.5].	7	\$ 450.00	\$ 3,150.00
8/20/2020	BHC	Worked on response to motion to dismiss [6.4].	6.4	\$ 450.00	\$ 2,880.00
8/21/2020	BHC	Worked on response to motion to dismiss and supporting declarations [6.8].	6.8	\$ 450.00	\$ 3,060.00
8/22/2020	BHC	Worked on Plaintiff's response to motion to dismiss [.6].	0.6	\$ 450.00	\$ 270.00
8/24/2020	BHC	Revised and finalized response to motion to dismiss for filing [5.8].	5.8	\$ 450.00	\$ 2,610.00
8/26/2020	BHC	Exchanged emails with co-counsel regarding response to subpoenas [.2].	0.2	\$ 450.00	\$ 90.00
9/1/2020	BHC	Worked on supplemental index of non-Washington authorities and approved same for filing [.2]. Analyzed reply in support of motion to dismiss in preparation for argument on same [.5].	0.7	\$ 450.00	\$ 315.00
9/3/2020	BHC	Prepared for argument on motion for judgment on the pleadings [4]; argument moot [.5].	4.5	\$ 450.00	\$ 2,025.00
9/4/2020	BHC	Prepared for argument on motion to dismiss [1.3]; oral argument [1]. Worked on subpoenas to notaries [.2].	2.5	\$ 450.00	\$ 1,125.00

Date	Initials	Narrative	Units	Rate	Value
9/14/2020	BHC	Read email from Bank of America regarding subpoena response and sent same to co-counsel [.2]. Responded email regarding subpoena to notary Riles [.1].	0.3	\$ 450.00	\$ 135.00
9/21/2020	BHC	Telephone conference with Ms. Morales regarding subpoena response [.2].	0.2	\$ 450.00	\$ 90.00
9/22/2020	BHC	Exchanged emails with co-counsel regarding Defendants' request for interlocutory appeal and discovery matters [.2].	0.2	\$ 450.00	\$ 90.00
9/24/2020	BHC	Worked with staff on issues with notary service [.1].	0.1	\$ 450.00	\$ 45.00
9/25/2020	BHC	Worked on plaintiff's motion to compel [.9].	0.9	\$ 450.00	\$ 405.00
9/28/2020	BHC	Worked on motion to compel; finalized same and approved for filing [3.5].	3.5	\$ 450.00	\$ 1,575.00
9/29/2020	BHC	Exchanged emails with co-counsel regarding case management [.1]. Read defendant's motion for stay of discovery [.2].	0.3	\$ 450.00	\$ 135.00
10/2/2020	BHC	Worked on response to motion to stay [.8]. Worked on subpoena response document management [.2].	1	\$ 450.00	\$ 450.00
10/5/2020	BHC	Worked on response to motion for stay; approved same for filing [1.5].	1.5	\$ 450.00	\$ 675.00
10/6/2020	BHC	Responded to inquiry from the Court regarding working papers [.1].	0.1	\$ 450.00	\$ 45.00
10/7/2020	BHC	Worked on reply in support of motion to compel [1.2]. Confirmed delivery of working copies of motion [.3].	1.5	\$ 450.00	\$ 675.00
10/13/2020	BHC	Reviewed Court's orders on motion to compel and motion to stay; exchanged emails with co-counsel regarding same [.3].	0.3	\$ 450.00	\$ 135.00
10/20/2020	BHC	Worked on appellate motion to dismiss; approved same for filing [.7].	0.7	\$ 450.00	\$ 315.00
10/22/2020	BHC	Letter to Mr. Coffing regarding case status and potential resolution [2.5].	2.5	\$ 450.00	\$ 1,125.00
10/27/2020	BHC	Reviewed Defendants' request to dismiss appeal [.2].	0.2	\$ 450.00	\$ 90.00
10/28/2020	BHC	Read and analyzed letter from counsel for Seed; discussed same with co-counsel [.4].	0.4	\$ 450.00	\$ 180.00
10/30/2020	BHC	Worked on First Amended Complaint [1.2].	1.2	\$ 450.00	\$ 540.00
11/3/2020	BHC	Worked on confirmation of joinder and motion for leave to amend [1.2].	1.2	\$ 450.00	\$ 540.00

Date	Initials	Narrative	Units	Rate	Value
11/10/2020	BHC	Worked on motion for leave to amend [1]. Telephone conference with co-counsel regarding case management [.3].	1.3	\$ 450.00	\$ 585.00
11/16/2020	BHC	Responded to inquiry from the Court regarding working copies [.1].	0.1	\$ 450.00	\$ 45.00
11/18/2020	BHC	Letter to Mr. Coffing regarding potential settlement.	1.1	\$ 450.00	\$ 495.00
11/20/2020	BHC	Made final revisions to settlement demand letter; revised and sent same [.3].	0.3	\$ 450.00	\$ 135.00
11/23/2020	BHC	Drafted reply in support of motion for leave to amend and approved same for filing [.3].	0.3	\$ 450.00	\$ 135.00
12/2/2020	BHC	Exchanged emails with defense counsel regarding filed First Amended Complaint and individual defendants' acceptance of service [.2].	0.2	\$ 450.00	\$ 90.00
12/9/2020	BHC	Reviewed settlement offer; exchanged emails with co-counsel and scheduled conference to discuss same [.4].	0.4	\$ 450.00	\$ 180.00
12/10/2020	BHC	Telephone conference with co-counsel regarding settlement negotiation [.4]. Exchanged emails with co-counsel regarding tax treatment of settlement [.2]. Email to defense counsel providing Plaintiff's counteroffer [.3].	0.9	\$ 450.00	\$ 405.00
12/18/2020	BHC	Reviewed acceptance of service forms and sent same to filing [.1].	0.1	\$ 450.00	\$ 45.00
12/21/2020	BHC	Drafted preliminary witness disclosure; approved final version of same and served on counsel for Tussy and Gantz [.6].	0.6	\$ 450.00	\$ 270.00
1/7/2021	BHC	Exchanged emails with co-counsel regarding settlement offer from Defendants [.3].	0.3	\$ 450.00	\$ 135.00
1/11/2021	BHC	Exchanged emails with co-counsel regarding settlement offer [2]; email to defense counsel rejecting same [.1].	2.1	\$ 450.00	\$ 945.00
1/12/2021	BHC	Telephone conference with co-counsel regarding case management [.4].	0.4	\$ 450.00	\$ 180.00
1/15/2021	BHC	Worked on draft motion for class certification and sent example to co-counsel [.3].	0.3	\$ 450.00	\$ 135.00
1/27/2021	BHC	Exchanged emails with co-counsel regarding case schedule and strategy [.2].	0.2	\$ 450.00	\$ 90.00
1/29/2021	BHC	Exchanged emails with Mr. Jayne regarding case schedule and potential settlement discussion [.2].	0.2	\$ 450.00	\$ 90.00



Date	Initials	Narrative	Units	Rate	Value
2/1/2021	BHC	Telephone call with co-counsel regarding motion for class certification [.4].	0.4	\$ 450.00	\$ 180.00
2/2/2021	BHC	Worked on motion for class certification and sent to co-counsel [.6]. Worked on motion to amend case schedule [.7]. Prepared for call with defense counsel [.3]; participated in same [.3]; follow up call with co-counsel regarding same [.3]. Sent proposed motion to amend schedule and order to defense counsel [.1].	0.6	\$ 450.00	\$ 270.00
2/3/2021	BHC	Worked on affidavit and scheduling issues with co-counsel [.4].	1.7	\$ 450.00	\$ 765.00
2/5/2021	BHC	Telephone call with staff regarding work on class member identification from subpoena responses [.2].	0.4	\$ 450.00	\$ 180.00
2/8/2021	BHC	Email to Mr. Jayne regarding case schedule [.1]. Finalized motion to amend case schedule and supervised filing [.4].	0.2	\$ 450.00	\$ 90.00
2/12/2021	BHC	Email to co-counsel regarding motions to dismiss [.2].	0.5	\$ 450.00	\$ 225.00
2/15/2021	BHC	Read and analyzed defendants' motion to dismiss; telephone conference with co-counsel regarding response to motion to dismiss; sent sample personal jurisdiction discovery and briefing to co-counsel [1.5].	0.2	\$ 450.00	\$ 90.00
2/17/2021	BHC	Reviewed order re-assigning case and sent same to filing [.1].	1.5	\$ 450.00	\$ 675.00
2/19/2021	BHC	Exchanged emails with co-counsel and counsel for Gantz regarding hearing on motion to dismiss [.1].	0.1	\$ 450.00	\$ 45.00
2/23/2021	BHC	Responded to email from notary McHenry [.1].	0.1	\$ 450.00	\$ 45.00
2/27/2021	BHC	Reviewed case schedule and status of motion to revise same; email o staff regarding follow up with court on same [.2].	0.1	\$ 450.00	\$ 45.00
3/1/2021	BHC	Reviewed orders from Court; sent same to all counsel [.2].	0.2	\$ 450.00	\$ 90.00
3/4/2021	BHC	Worked on discovery requests to defendants Tussy and Gantz [1.4].	0.2	\$ 450.00	\$ 90.00
3/9/2021	BHC	Worked on discovery requests to Gantz and Tussy [.6].	1.4	\$ 450.00	\$ 630.00
3/15/2021	BHC	Email to paralegal regarding notary subpoena tracking [.1].	0.6	\$ 450.00	\$ 270.00
3/22/2021	BHC	Email to co-counsel regarding case management [.2].	0.1	\$ 450.00	\$ 45.00
3/24/2021	BHC	Email to co-counsel regarding case management [.2].	0.2	\$ 450.00	\$ 90.00
3/31/2021	BHC	Analyzed issues regarding amended complaint to [REDACTED] [1].	1	\$ 450.00	\$ 450.00
4/1/2021	BHC	Drafted response to Seed's request for discovery stay [.7].	0.7	\$ 450.00	\$ 315.00

Date	Initials	Narrative	Units	Rate	Value
4/5/2021	BHC	Reviewed defendants' settlement offer and exchanged emails with co-counsel regarding same [.1]; telephone call with co-counsel regarding settlement offer and next steps [.2].	0.3	\$ 450.00	\$ 135.00
4/6/2021	BHC	Email to co-counsel regarding Defendant's settlement communication [.2]. Discussed settlement offer with co-counsel; email to defense counsel rejecting same [.4]. Approved draft email to defense counsel regarding request to confer with Seed [.1].	0.2	\$ 450.00	\$ 90.00
4/7/2021	BHC	Exchanged emails with defense counsel regarding unfiled motion to dismiss [.2]; exchanged emails with co-counsel regarding response to motion and case strategy [.3].	0.5	\$ 450.00	\$ 225.00
4/12/2021	BHC	Worked on response to motion to dismiss [2].	0.5	\$ 450.00	\$ 225.00
4/22/2021	BHC	Discussed case status and management with co-counsel [.3].	2	\$ 450.00	\$ 900.00
4/23/2021	BHC	Video conference with co-counsel regarding client questions [.4].	0.3	\$ 450.00	\$ 135.00
4/26/2021	BHC	Worked on response to motion for protective order; email to co-counsel regarding same [.9]. Email to staff regarding transcript request [.1].	0.4	\$ 450.00	\$ 180.00
4/28/2021	BHC	Worked on opposition to Seed's motion for protective order and declaration and exhibits in support of same [1.5]; approved all documents for filing [.4].	0.9	\$ 450.00	\$ 405.00
4/29/2021	BHC	Analyzed motion dismiss issues in preparation for hearing strategy conference [.3]; conference with co-counsel regarding hearing strategy [.8]. Worked with staff on updating file to include clerk's office docket numbers [.3].	1.9	\$ 450.00	\$ 855.00
5/4/2021	BHC	Prepared for hearing on motion to dismiss for lack of personal jurisdiction [2].	1.4	\$ 450.00	\$ 630.00
5/5/2021	BHC	Prepared for hearing on motion to dismiss [9.8].	2	\$ 450.00	\$ 900.00
5/6/2021	BHC	Prepared for hearing on motion to dismiss [3]; appeared at hearing [1]; analyzed case management in light of rulings with co-counsel [.2]. Worked on proposed order memorializing Court's orders [.5]; sent same to defense counsel [.1].	9.8	\$ 450.00	\$ 4,410.00
5/7/2021	BHC	Added additional defense counsel to proposed order per Mr. Jayne's request and submitted same to Court [.2]. Video conference with co-counsel regarding case management [.5].	4.8	\$ 450.00	\$ 2,160.00
5/10/2021	BHC		0.7	\$ 450.00	\$ 315.00

Date	Initials	Narrative	Units	Rate	Value
5/11/2021	BHC	Drafted second set of discovery requests to Erik Gantz; reviewed and approved co-counsel revisions to same [2.2]. Email memo to Mr. Jayne regarding preservation obligations and discovery matters [4]. Worked with staff on subpoena to FTC [1].	2.7	\$ 450.00	\$ 1,215.00
5/12/2021	BHC	Email to all counsel regarding discovery matters [1]. Discussed case management with co-counsel [3]. Email to potential investigator regarding contacting Seed employees [1]. Exchanged emails with paralegal regarding subpoenas to the FTC [2].	0.7	\$ 450.00	\$ 315.00
5/14/2021	BHC	Telephone conference with investigator regarding interviewing Seed employees; follow up emails regarding same [7]	0.7	\$ 450.00	\$ 315.00
5/21/2021	BHC	Read and analyzed individual defendants' answer to First Amended Complaint [3].	0.3	\$ 450.00	\$ 135.00
5/24/2021	BHC	Worked on email to defense counsel regarding discovery matters [2]. Completed draft of motion to extend case schedule [3]; memo to co-	0.2	\$ 450.00	\$ 90.00
5/25/2021	BHC	counsel regarding same [1].	0.4	\$ 450.00	\$ 180.00
6/1/2021	BHC	Responded to inquiry from investigator [1].	0.1	\$ 450.00	\$ 45.00
6/2/2021	BHC	Confirmed agreed definition for discovery requests in response to inquiry from Mr. Jayne [2], Worked on unopposed motion to amend case	0.4	\$ 450.00	\$ 180.00
6/3/2021	BHC	schedule and approved same for filing [2].	0.1	\$ 450.00	\$ 45.00
6/4/2021	BHC	Exchanged emails with investigator regarding status [1].	0.6	\$ 450.00	\$ 270.00
6/7/2021	BHC	Reviewed investigator interviews of former Seed employees [6]. Approved jury demand for filing [1]. Exchanged emails with investigator regarding witness interview [1].	0.2	\$ 450.00	\$ 90.00
6/8/2021	BHC	Exchanged emails with investigator regarding scheduling and investigation time [1].	0.1	\$ 450.00	\$ 45.00
6/15/2021	BHC	Drafted message to Mr. Jayne regarding email preservation issues [2]. Exchanged emails with co-counsel regarding Seed emails [2]. Reviewed	0.2	\$ 450.00	\$ 90.00
6/16/2021	BHC	meet and confer letter to Mr. Jayne regarding Gantz and Tussy discovery responses. [3].	0.5	\$ 450.00	\$ 225.00

Date	Initials	Narrative	Units	Rate	Value
7/13/2021	BHC	Worked on Plaintiff's third set of requests for production to Gantz [.2]. Worked on submission of agreed protective order to court [.2]. Exchanged emails with co-counsel regarding [REDACTED] [.1].	0.5	\$ 450.00	\$ 225.00
7/14/2021	BHC	Reviewed and analyzed documents produced by Defendants in preparation for depositions [1.7].	1.7	\$ 450.00	\$ 765.00
7/26/2021	BHC	Email to Mr. Jayne regarding case management [.2]. Telephone conference with co-counsel regarding case management [.4].	0.6	\$ 450.00	\$ 270.00
7/28/2021	BHC	Telephone conference with counsel for Seed and discovery vendor regarding production of FTC documents [.4]; follow up emails regarding same [.2].	0.6	\$ 450.00	\$ 270.00
8/2/2021	BHC	Exchanged emails with co-counsel regarding discovery matters [.1].	0.1	\$ 450.00	\$ 45.00
8/10/2021	BHC	Email to defense counsel regarding discovery progress [.3]. Reviewed documents for inclusion in class certification motion [.9]. Telephone conference with co-counsel regarding work on motion for class certification [.4]; follow up email regarding same [.2].	1.8	\$ 450.00	\$ 810.00
8/11/2021	BHC	Exchanged emails with co-counsel regarding outstanding discovery and case schedule [.4]. Email to Mr. Jayne requesting dates for individual defendant depositions [.1].	0.5	\$ 450.00	\$ 225.00
8/12/2021	BHC	Exchanged emails with co-counsel regarding discovery matters [.1].	0.1	\$ 450.00	\$ 45.00
8/13/2021	BHC	Exchanged emails with co-counsel and defense counsel regarding discovery matters [.4].	0.4	\$ 450.00	\$ 180.00
8/17/2021	BHC	Reviewed documents produced to FTC in preparation for class certification and depositions [1.2]. Email to Mr. Jayne regarding deposition dates [.2].	1.4	\$ 450.00	\$ 630.00
8/18/2021	BHC	Video conference with co-counsel regarding document review in preparation for depositions and class certification briefing [.5].	0.5	\$ 450.00	\$ 225.00
8/23/2021	BHC	Exchanged emails with defense counsel regarding scheduling telephone conference [.1].	0.1	\$ 450.00	\$ 45.00
8/24/2021	BHC	Email to all counsel regarding scheduling telephone conference [.1].	0.1	\$ 450.00	\$ 45.00

Date	Initials	Narrative	Units	Rate	Value
8/26/2021	BHC	Prepared for call with defense counsel [.3]. Telephone conference with all counsel regarding depositions and potential settlement [.4]; follow up call with co-counsel regarding same [.6]; email to all counsel confirming deposition dates [.1]. Discussed settlement offer from defense counsel with Ms. Terrell [.3].	1.7	\$ 450.00	\$ 765.00
9/3/2021	BHC	Worked on Plaintiff's 3rd set of discovery to Tussy and 4th set of discovery to Gantz [.3].	0.3	\$ 450.00	\$ 135.00
9/7/2021	BHC	Discussed work on motion for class certification with co-counsel.	0.1	\$ 450.00	\$ 45.00
9/16/2021	BHC	Worked on Plaintiff's motion for class certification and declaration in support of same [.8]; discussed motion for class certification with co-counsel [.1].	0.9	\$ 450.00	\$ 405.00
9/20/2021	BHC	Discussed motion for class certification with co-counsel [.1]. Sent client declaration in support of class certification to co-counsel to coordinate with client on signature [.1]. Email to staff regarding absent class member declarations [.1].	0.3	\$ 450.00	\$ 135.00
9/23/2021	BHC	Worked on motion for class certification and documents supporting same [.6]. Email to court regarding case scheduling order [.1].	0.7	\$ 450.00	\$ 315.00
9/27/2021	BHC	Exchanged emails with co-counsel regarding Court's request for proposed order on class certification in Word format [.1].	0.1	\$ 450.00	\$ 45.00
9/28/2021	BHC	Discussed Gantz deposition preparation with co-counsel [.3].	0.3	\$ 450.00	\$ 135.00
9/30/2021	BHC	Read and analyzed defendants' response to Plaintiff's motion for class certification; discussed same with co-counsel [1].	1	\$ 450.00	\$ 450.00
10/1/2021	BHC	Email to defense counsel regarding deposition logistics and use of Agile [.2]. Worked with staff on exhibit preparation [.3]. Strategized with Ms. Terrell regarding Gantz deposition [.2].	0.7	\$ 450.00	\$ 315.00
10/2/2021	BHC	Worked on reply in support of class certification.	0.4	\$ 450.00	\$ 180.00
10/3/2021	BHC	Worked on Gantz deposition exhibits and deposition goals outline [1.5].	1.5	\$ 450.00	\$ 675.00
10/4/2021	BHC	Worked on issue related to Gantz deposition calendaring [.1].	0.1	\$ 450.00	\$ 45.00

Date	Initials	Narrative	Units	Rate	Value
10/5/2021	BHC	Discussed Gantz deposition with co-counsel [.5]. Reviewed documents in preparation for Gantz deposition [.6]. Deposition of Gantz [8.5]; follow up discussion with co-counsel regarding same [.1]. Worked on surreply response [.1].	9.8	\$ 450.00	\$ 4,410.00
10/6/2021	BHC	Worked on document review for Tussy deposition [1]. Discussed Tussy deposition and exhibits with co-counsel [.5].	1.5	\$ 450.00	\$ 675.00
10/7/2021	BHC	Deposition of Kevin Tussy [4.6]; discussed deposition with co-counsel [.2]. Prepared for Tussy deposition [.2].	5	\$ 450.00	\$ 2,250.00
10/8/2021	BHC	Email to co-counsel regarding outstanding discovery to address with defense counsel [.4].	0.4	\$ 450.00	\$ 180.00
10/11/2021	BHC	Discussed case management, schedule and strategy with co-counsel [.3]. Email to co-counsel regarding meet and confer letter and document review [.2].	0.5	\$ 450.00	\$ 225.00
10/15/2021	BHC	Worked on letter to Mr. Jayne regarding discovery matters [1.4].	1.4	\$ 450.00	\$ 630.00
10/19/2021	BHC	Exchanged emails with staff regarding work on draft notice [.2].	0.2	\$ 450.00	\$ 90.00
10/20/2021	BHC	Video conference with co-counsel regarding case management issues [.6].	0.6	\$ 450.00	\$ 270.00
10/22/2021	BHC	Meet and confer with counsel for Seed [.9]; prepared for same [.2]; follow up call with co-counsel regarding Seed discovery matters [.3]. Email to co-counsel regarding FTC attorney name [.2].	1.6	\$ 450.00	\$ 720.00
10/26/2021	BHC	Reviewed research regarding enforcing judgments in Nevada [.2].	0.5	\$ 450.00	\$ 225.00
11/4/2021	BHC	Reviewed and revised class notice [.3]. Email to staff regarding class notice [.1].	0.1	\$ 450.00	\$ 45.00
11/8/2021	BHC	Exchanged emails with staff regarding engagement letter from Nevada co-counsel [.1].	0.1	\$ 450.00	\$ 45.00
11/10/2021	BHC	Worked on class notices; sent same to defense counsel along with summary of proposed notice plan [.5]. Email to Mr. Jayne regarding outstanding discovery matters [.1]. Responded to email from Mr. Jayne regarding proposed notices [.3].	0.9	\$ 450.00	\$ 405.00
11/16/2021	BHC	Worked on motion to approve class notice.	0.3	\$ 450.00	\$ 135.00
11/17/2021	BHC	Worked on finalizing motion to approve class notice with co-counsel [.3].	0.3	\$ 450.00	\$ 135.00

Date	Initials	Narrative	Units	Rate	Value
11/29/2021	BHC	Exchanged emails with co-counsel regarding follow up on meet and confer with defense counsel [.1]. Drafted reply in support of class notice plan and approved same for filing [.2].	0.3	\$ 450.00	\$ 135.00
12/3/2021	BHC	Exchanged emails with co-counsel regarding document production from Seed [.1].	0.1	\$ 450.00	\$ 45.00
12/6/2021	BHC	Telephone conference with Ms. Adams regarding research in preparation for response to motion for summary judgment [.2]; reviewed research regarding same; email regarding research [.2].	0.4	\$ 450.00	\$ 180.00
12/7/2021	BHC	Worked on Plaintiff's motion to compel [2.5].	2.5	\$ 450.00	\$ 1,125.00
12/9/2021	BHC	Reviewed research from co-counsel regarding minimum contacts for purposes of personal jurisdiction [.3].	0.3	\$ 450.00	\$ 135.00
12/13/2021	BHC	Video conference with co-counsel regarding strategy for response to motion for summary judgment and case schedule [.7]. Legal research regarding response to motion for summary judgment [1].	1.7	\$ 450.00	\$ 765.00
12/14/2021	BHC	Exchanged emails with defense counsel regarding plaintiff's planned motion for summary judgment [.1]. Legal research regarding response to motion for summary judgment [2.8].	2.9	\$ 450.00	\$ 1,305.00
12/15/2021	BHC	Email to court regarding date for summary judgment hearing [.1]. Legal research regarding response to motion for summary judgment [2.5].	2.6	\$ 450.00	\$ 1,170.00
12/16/2021	BHC	Legal research regarding response to motion for summary judgment [3].	3	\$ 450.00	\$ 1,350.00
12/17/2021	BHC	Read deposition transcripts in preparation for work on response to motion for summary judgment [5.5].	5.5	\$ 450.00	\$ 2,475.00
12/20/2021	BHC	Read deposition transcripts in preparation for work on response to motion for summary judgment [6.5].	6.5	\$ 450.00	\$ 2,925.00
12/21/2021	BHC	Worked on motion to compel.	1.2	\$ 450.00	\$ 540.00
12/21/2021	BHC	Worked on response to motion for summary judgment [6.1].	6.1	\$ 450.00	\$ 2,745.00
12/22/2021	BHC	Worked on response to motion for summary judgment [6.5].	6.5	\$ 450.00	\$ 2,925.00
12/23/2021	BHC	Worked on response to motion for summary judgment [5.5].	5.5	\$ 450.00	\$ 2,475.00
12/27/2021	BHC	Worked on Seed SJ response; approved all final documents for filing [5.6].	5.6	\$ 450.00	\$ 2,520.00
12/29/2021	BHC	Telephone call with staff regarding notice website [.1].	0.1	\$ 450.00	\$ 45.00

Date	Initials	Narrative	Units	Rate	Value
1/3/2022	BHC	Worked on reply in support of motion to compel [3.1]. Reviewed final documents and approved for filing [.2]. Emails to and from the Court regarding scheduling matters [.2].	3.5	\$ 450.00	\$ 1,575.00
1/4/2022	BHC	Exchanged emails with co-counsel regarding discovery and case management strategy [.4].	0.4	\$ 450.00	\$ 180.00
1/5/2022	BHC	Exchanged emails with co-counsel regarding drafting plaintiff's motion for summary judgment [.2]. Prepared for oral argument [4.5].	4.7	\$ 450.00	\$ 2,115.00
1/6/2022	BHC	Prepared for hearing on motion for summary judgment.	6	\$ 450.00	\$ 2,700.00
1/7/2022	BHC	Final preparation for oral argument [.8]; presented oral argument on defendants' motion for summary judgment [.8].	1.6	\$ 450.00	\$ 720.00
1/13/2022	BHC	Worked on class notice website with staff [.8].	0.8	\$ 450.00	\$ 360.00
1/14/2022	BHC	Worked with staff on request for transcript of oral ruling [.2]. Researched mediator proposed by defense counsel [.4]; exchanged emails with co-counsel regarding same [.1]. Reviewed and approved email notice to class members [.3].	1	\$ 450.00	\$ 450.00
1/18/2022	BHC	Email to staff regarding responding to absent class member questions [.2].	0.2	\$ 450.00	\$ 90.00
1/19/2022	BHC	Worked with staff on issues related to submission of working copies [.2]. Telephone conference with Ms. Steiner regarding strategy for motion for summary judgment [.4].	0.2	\$ 450.00	\$ 90.00
1/21/2022	BHC	Worked on motion for summary judgment [.6].	0.4	\$ 450.00	\$ 180.00
1/31/2022	BHC	Worked on motion for summary judgment [.6].	0.6	\$ 450.00	\$ 270.00
2/1/2022	BHC	Email to co-counsel regarding draft motion to partial summary judgment [.2].	0.2	\$ 450.00	\$ 90.00
2/2/2022	BHC	Analyzed issues related to filing absent class member declarations with co-counsel [.8]. Telephone call with co-counsel regarding same [.3]. Approved draft email to absent class members regarding declarations [.1].	1.2	\$ 450.00	\$ 540.00
2/4/2022	BHC	Worked with co-counsel on finalizing motion for summary judgment and supporting documents [.5].	0.5	\$ 450.00	\$ 225.00
2/14/2022	BHC	Email to co-counsel regarding drafting mediation submission [.3].	0.3	\$ 450.00	\$ 135.00



Date	Initials	Narrative	Units	Rate	Value
2/23/2022	BHC	Read and analyzed Seed's summary judgment response [.8]; discussed same with co-counsel [.4]; research related to same [.5].	1.7	\$ 450.00	\$ 765.00
2/23/2022	BHC	Worked on mediation submission and draft settlement agreement.	1.2	\$ 450.00	\$ 540.00
2/28/2022	BHC	Worked on reply brief [1]; made final revisions to same before filing [.4]. Worked on discovery letter responding to Mr. Jayne [.6]. Worked on mediation submission [1.2]. Worked on and sent other mediation documents to ARM [.6].	2	\$ 450.00	\$ 900.00
3/1/2022	BHC	Prepared for summary judgment hearing [3.8].	1.8	\$ 450.00	\$ 810.00
3/2/2022	BHC	Prepared for oral argument [8.2].	3.8	\$ 450.00	\$ 1,710.00
3/3/2022	BHC	Prepared for oral argument [1.5]. Participated in hearing [1.1]. Post-hearing strategy discussion with co-counsel [.4]. Edited proposed order drafted by defense counsel [.3].	8.2	\$ 450.00	\$ 3,690.00
3/4/2022	BHC	Telephone calls with co-counsel regarding client computer access [.3]. Responded to Mr. Jayne's email regarding client attendance at mediation [.4].	3.3	\$ 450.00	\$ 1,485.00
3/7/2022	BHC	Participated in mediation [4.2].	0.7	\$ 450.00	\$ 315.00
3/8/2022	BHC	Prepared for pretrial conference; participated in pretrial conference [2.5]. Worked on draft pretrial order [.3]. Discussed jury demand with Ms. Terrell and Mr. Marshall [.2].	4.2	\$ 450.00	\$ 1,890.00
3/11/2022	BHC	Completed response to motion to clarify order.	3	\$ 450.00	\$ 1,350.00
3/12/2022	BHC	Worked on response to motion for clarification; approved same for filing [.7].	1.9	\$ 450.00	\$ 855.00
3/14/2022	BHC	Read Seed reply in support of motion for clarification [.2].	0.7	\$ 450.00	\$ 315.00
3/16/2022	BHC	Reviewed and edited draft jury instructions [.8]; reviewed ER 904 designations [.6]; sent same to co-counsel [.1].	0.2	\$ 450.00	\$ 90.00
3/17/2022	BHC	Exchanged emails with counsel and court regarding trial schedule [.4].	1.5	\$ 450.00	\$ 675.00
3/21/2022	BHC	Video conference with all counsel regarding trial schedule [.4].	0.4	\$ 450.00	\$ 180.00
3/31/2022	BHC	Responded to email from court's bailiff regarding case schedule [.1]; worked on stipulated motion to amend case schedule [.3].	0.4	\$ 450.00	\$ 180.00
4/5/2022	BHC				

Date	Initials	Narrative	Units	Rate	Value
4/6/2022	BHC	Worked on stipulated motion to change trial date and proposed order; sent same to all counsel for approval [.3].	0.3	\$ 450.00	\$ 135.00
4/11/2022	BHC	Compared scheduling orders entered by the Court; drafted proposed response to email from Mr. Jayne and sent [.4].	0.4	\$ 450.00	\$ 180.00
4/12/2022	BHC	Worked on discovery letter regarding financial issues [.5].	0.5	\$ 450.00	\$ 225.00
4/19/2022	BHC	Meet and confer with counsel for defendants [.6].	0.6	\$ 450.00	\$ 270.00
4/21/2022	BHC	Worked on letter regarding meet and confer and sent to staff to finalized and send [.4].	0.4	\$ 450.00	\$ 180.00
5/4/2022	BHC	Worked on discovery letter to Mr. Jayne [.6].	0.6	\$ 450.00	\$ 270.00
5/26/2022	BHC	Worked on motion for sanctions [.5].	0.5	\$ 450.00	\$ 225.00
5/27/2022	BHC	Worked on proposed order supporting motion for sanctions [.5].	0.5	\$ 450.00	\$ 225.00
6/7/2022	BHC	Telephone call with Ms. Terrell regarding reply supporting motion for sanctions [.1].	0.1	\$ 450.00	\$ 45.00
6/8/2022	BHC	Reviewed emails from court regarding motion for sanctions noted before Judge O'Donnell [.1].	0.1	\$ 450.00	\$ 45.00
6/10/2022	BHC	Exchanged emails with co-counsel and staff regarding FTC documents [.1].	0.1	\$ 450.00	\$ 45.00
6/17/2022	BHC	Discussed case management with Ms. Terrell [.2]; responded to email from Ms. Butler regarding request for deposition dates [.3].	0.5	\$ 450.00	\$ 225.00
6/21/2022	BHC	Worked on trial plan and jury instructions [2]. Video conference with co-counsel regarding trial preparation [1.5].	3.5	\$ 450.00	\$ 1,575.00
6/28/2022	BHC	Read and analyzed summary judgment hearing transcript [.5]; sent same to co-counsel [.1]. Email to Ms. Butler regarding her request to reopen discovery [.4]; discussed same with Ms. Terrell [.2]. Searched email for defendants' witness disclosures [.4].	1.6	\$ 450.00	\$ 720.00
6/29/2022	BHC	Reviewed documents for potential trial exhibits [.8]. Video conference with co-counsel regarding case management [1.5]; discussed same with Ms. Terrell [.4].	2.7	\$ 450.00	\$ 1,215.00
6/30/2022	BHC	Meet and confer with counsel for Gantz and Tussy regarding discovery [.4].	0.4	\$ 450.00	\$ 180.00
7/5/2022	BHC	Read and analyzed order on motion for sanctions [.2]. Email to law clerk regarding jury instruction research project [.3].	0.5	\$ 450.00	\$ 225.00

Date	Initials	Narrative	Units	Rate	Value
7/7/2022	BHC	Meeting with Ms. Terrell regarding case management [.8]. Videoconference with co-counsel regarding case management [.8]. Outlined research project on personal jurisdiction issues for law clerk [.3].	1.9	\$ 450.00	\$ 855.00
7/11/2022	BHC	Exchanged emails with absent class members to schedule interviews [.5].	0.5	\$ 450.00	\$ 225.00
7/12/2022	BHC	Prepared for interviews with absent class members [.9]. Videoconferences with Ms. Neil [1]. Video conference with Ms. Barrett [.1]; discussed same with co-counsel [.5]. Email to court regarding setting pretrial conference [.1]. Read and analyzed court's sanctions order [.3]. Exchanged emails with absent class members regarding scheduling interviews [.2].	3.1	\$ 450.00	\$ 1,395.00
7/13/2022	BHC	Video conference with co-counsel regarding case management [1]. Exchanged emails with co-counsel, staff, and Mr. Jayne regarding obtaining copies of QuickBooks records [.2]. Email to Ms. Nordby regarding fee motion [.2]. Interview with potential witness Jurgemeyer [.6]; follow up discussion with co-counsel regarding same [.2]. Email to Ms. Butler regarding deposition schedule and other discovery matters [.3].	2.5	\$ 450.00	\$ 1,125.00
7/25/2022	BHC	Worked on case management and discovery matters [3.5].	3.5	\$ 450.00	\$ 1,575.00
7/26/2022	BHC	Interview with absent class member Hills [.5]. Drafted proposed order clarifying order on summary judgment [.9]. Legal research regarding motion to clarify summary judgment order [2.5]. Worked on motion to clarify summary judgment order [1.1].	5	\$ 450.00	\$ 2,250.00
7/27/2022	BHC	Read and analyzed Tussy's response to motion for fees [.3]. Travel to client's home for deposition preparation [1]. Client deposition preparation [2.4]. Travel from client's home after deposition preparation [1].	4.7	\$ 450.00	\$ 2,115.00
7/27/2022	BHC	Drafted reply in support of motion to determine fee amount.	2.7	\$ 450.00	\$ 1,215.00
					\$ 1,665.00

Date	Initials	Narrative	Units	Rate	Value
7/28/2022	BHC	Revised reply in support of fee award and sent same to all counsel for review [.5]. Travel to client's home for deposition preparation [1]. Client deposition preparation [1.9]. Travel from client's home for deposition preparation [1]. Videoconference with class member Wills [.5]. Final revisions to reply in support of fee award; sent same to staff to finalize for filing [.3]. Video conference with class member Fields [.4]. Email to defense counsel regarding absent class members who may be called at trial [.6]. Worked with Ms. Langsted and preparing class member documents for production [.2].	6.4	\$ 450.00	\$ 2,880.00
7/29/2022	BHC	Travel to client deposition [1]. Defended client deposition [4.5]; discussion with client and co-counsel after same [.8]. Travel from client deposition [1].	7.3	\$ 450.00	\$ 3,285.00
8/1/2022	BHC	Videoconference with absent class member Miller [.9]. Prepared for meeting with Ms. Miller [.2]. Videoconference with co-counsel regarding case management [.2].	1.3	\$ 450.00	\$ 585.00
8/1/2022	BHC	Completed work on proposed order clarifying default and summary judgment order and motion for entry of same [3.8]. Commenced drafting direct examination of Erik Gantz [1.5].	5.3	\$ 450.00	\$ 2,385.00
8/2/2022	BHC	Meet and confer with Ms. Butler regarding Mr. Tussy's failure to respond to third set of discovery requests [.6]; prepared for same [.1]. Reviewed absent class member documents for production [1.1]. Revised motion to clarify and proposed order per comments from co-counsel [.3]. Telephone conference with Ms. Nordby regarding trial staffing [.3]. Exchanged emails with co-counsel regarding absent class member deposition scheduling [.1].	2.5	\$ 450.00	\$ 1,125.00
8/3/2022	BHC	Final revisions to motion to clarify order; sent same to staff to finalize for filing [.5]. Exchanged emails and telephone calls with co-counsel regarding deposition scheduling for Tussy and absent class members [.4].	0.9	\$ 450.00	\$ 405.00
8/4/2022	BHC	Worked on outline for Gantz trial examination [2.1].	2.1	\$ 450.00	\$ 945.00
8/5/2022	BHC	Worked on Gantz direct testimony outline.	0.6	\$ 450.00	\$ 270.00

Date	Initials	Narrative	Units	Rate	Value
8/8/2022	BHC	Personal meeting with Ms. Terrell regarding deposition and discovery management [.3]. Read and analyzed Tussy's motion for protective order [.4]. Commenced drafting response to Tussy's motion for protective order [2.5].	3.2	\$ 450.00	\$ 1,440.00
8/9/2022	BHC	Completed first draft of response to Tussy's motion for protective order [2.7]. Worked on issues related to subpoena to American Express [.3]. Exchanged emails with co-counsel regarding Gintz's production of financial records [.2]	3.2	\$ 450.00	\$ 1,440.00
8/10/2022	BHC	Worked on response to Tussy's motion for protective order, declaration supporting same, and proposed order denying same [1]. Research regarding whether a party may file second motion for summary judgment per Tussy's request to the Court for hearing date on second motion [.9].	2.8	\$ 450.00	\$ 1,260.00
8/10/2022	BHC	Worked on issues related to service of Feoli subpoena [.3]. Read and analyzed Gintz's response to motion to clarify; discussed same with Ms. Terrell [.6].	0.8	\$ 450.00	\$ 360.00
8/11/2022	BHC	Worked on direct exam of Gantz.	0.3	\$ 450.00	\$ 135.00
8/11/2022	BHC	Final review of response to Tussy's motion for protective order.			
8/11/2022	BHC	Drafted reply in support of motion to clarify [3]. Video conference with accounting expert [1.1]. Worked on issues related to inconsistencies in QuickBooks records produced by Gantz [.3].	4.4	\$ 450.00	\$ 1,980.00
8/12/2022	BHC	Drafted outline for absent class member Wills deposition preparation meeting [.4]. Video conference with Ms. Wills in preparation for deposition [1.3]; follow up with co-counsel regarding same [.2]. Final review of and approval for filing reply in support of motion to clarify [.1]. Final review of and approval for filing response to Tussy's motion for protective order [.2]. Exchanged emails with court reporter regarding transcript of Proudlove deposition [.1]. Reviewed documents for production to forensic accounting expert [.5].	2.8	\$ 450.00	\$ 1,260.00
8/12/2022	BHC	Worked on Gantz direct exam outline [1.5]. Meet and confer with counsel for Gantz and Tussy regarding trial issues and discovery [.7].	2.2	\$ 450.00	\$ 990.00

Date	Initials	Narrative	Units	Rate	Value
8/15/2022	BHC	Read and analyzed client transcript; identified one correction [1.1]; prepared for meeting with Ms. Barrett [.3]. Video conference with Ms. Barrett to prepare for deposition [1]. Email to Ms. Feoli regarding deposition schedule [.1].	2.5	\$ 450.00	\$ 1,125.00
8/16/2022	BHC	Drafted response to Gantz supplement regarding motion to clarify [.4]. Videoconference with Ms. Jurgemeyer to prepare for deposition [1.4]; follow up call with Ms. Terrell regarding same [.1].	1.9	\$ 450.00	\$ 855.00
8/17/2022	BHC	Participated in deposition of Ms. Barrett [2.5]. Telephone message for Ms. Wills [.1]. Telephone call form Ms. Wills [.1]. Defended Ms. Wills' deposition [3.1].	5.8	\$ 450.00	\$ 2,610.00
8/18/2022	BHC	Discussed Ms. Wills' deposition with Ms. Terrell [.2]. Deposition preparation meeting with Ms. Jurgemeyer [1]; prepared for same [.3].	1.5	\$ 450.00	\$ 675.00
8/19/2022	BHC	Reviewed additional documents received from Ms. Jurgemeyer [.4]; exchanged emails with co-counsel regarding same [.2]; worked with staff on production of same [.4]. Commenced drafting written settlement demand [.4]; discussed same with Ms. Terrell and determined to wait to complete and send until after rulings from the Court [.2].	1.6	\$ 450.00	\$ 720.00
8/19/2022	BHC	Defended Ms. Jurgemeyer's deposition.	2.4	\$ 450.00	\$ 1,080.00
8/22/2022	BHC	Prepared for deposition preparation meeting with Ms. Hills [.4]. Videoconference with Ms. Hills to prepare for deposition [1.5]. Read new Division I opinion on whether entire scheme was unfair or deceptive in preparation for work on trial brief and jury instructions [.5].	2.4	\$ 450.00	\$ 1,080.00
8/23/2022	BHC	Wrote credit services organization act research project assignment for law clerk [.4]. Exchanged emails with paralegal regarding gathering additional Hills documents [.1].	0.5	\$ 450.00	\$ 225.00
8/24/2022	BHC	Telephone calls with Ms. Hills regarding deposition [.2]. Defended Ms. Hills' deposition [2.1]. Email to court reporter providing Exhibit 3 to Hills deposition [.1]. Worked on jury instructions [.8]. Discussed Hills deposition and legal research with Ms. Terrell [.3].	3.5	\$ 450.00	\$ 1,575.00

Date	Initials	Narrative	Units	Rate	Value
8/25/2022	BHC	Worked on jury instructions and legal research related to finding of facts on personal jurisdiction and whether jury instruction needed.	5.3	\$ 450.00	\$ 2,385.00
8/26/2022	BHC	Exchanged emails with class member Neil regarding deposition schedule and logistics [.2]. Legal research related to whether judge or jury resolves personal jurisdiction and corporate veil piercing [4.5]. Memo to all counsel regarding jury instructions [.4].	5.1	\$ 450.00	\$ 2,295.00
8/29/2022	BHC	Exchanged emails with Ms. Neil and co-counsel regarding deposition preparation and scheduling [.2]. Videoconference with Terrell Marshall trial team to discuss completing ER 904 designation and exhibits lists [.8]. Email to law clerk summarizing research assignment on collateral source rule in preparation for motions in limine [.3]. Reviewed potential trial exhibits and narrowed list of potential exhibits [2.5]. Reviewed Ms. Neil's documents in preparation for her deposition; email to co-counsel regarding same [.6].	4.4	\$ 450.00	\$ 1,980.00
8/31/2022	BHC	Meeting with Ms. Neil to prepare for deposition [.3]. Defended Ms. Neil's deposition [3.1]. Video conference with co-counsel regarding jury instructions [.6]; worked on same [.3]. Video conference with experts [1]; follow up email to expert providing additional discovery responses and information to expert [.2]. Email to all counsel regarding scheduling Feoli deposition [.1]. Worked on ER 904 designations [1.2].	6.8	\$ 450.00	\$ 3,060.00
9/2/2022	BHC	Worked on ER 904 designations [3.5]; telephone conferences with co-counsel regarding ER 904 designations [.4]. Completed work on jury instructions and sent to co-counsel for review [1.5]; responded to revisions to same; served same on all counsel [.5].	5.9	\$ 450.00	\$ 2,655.00

Date	Initials	Narrative	Units	Rate	Value
9/6/2022	BHC	Legal research regarding standard for piercing corporate veil [1.3]. Drafted email to defense counsel regarding failure to produce all financial records [1.4]. Read and analyzed court's orders on motions to clarify and for protective order [.3]; discussed same with Ms. Terrell [.2]. Email to counsel for Ms. Feoli regarding scheduling deposition [.1]. Assigned staff project organizing class member agreements in to exhibits for trial [.2]. Meeting with law clerk regarding research project on collateral source rule and potential offsets [.4].	3.9	\$ 450.00	\$ 1,755.00
9/7/2022	BHC	Email to defense counsel regarding request for tax returns [.2]. Worked on Plaintiff's supplemental witness disclosure [1.5]. Worked on proposed jury instructions [1.2].	2.9	\$ 450.00	\$ 1,305.00
9/8/2022	BHC	Exchanged emails with defense counsel regarding meet and confer scheduling [.1]. Created pre-trial task list and sent to all counsel [1]. Worked with staff on summary exhibits [.5]. Worked on witness and exhibit lists [2].	3.6	\$ 450.00	\$ 1,620.00
9/9/2022	BHC	Video conference with co-counsel regarding case management [1]. Worked on summary exhibits [.8]. Read and analyzed motion to bifurcate; email to co-counsel providing outline for same [1.8]. Worked on issues related to exhibit list with staff [.6]. Exchanged emails with all counsel regarding scheduling Feoli deposition [.2]; email to expert regarding same [.1].	4.5	\$ 450.00	\$ 2,025.00
9/12/2022	BHC	Worked on witness and exhibit lists and summary exhibits [4.5]. Meeting with expert regarding defendant tax returns [.7]; follow up discussion with co-counsel regarding same [.3]. Worked on client deposition transcript corrections [.4].	5.9	\$ 450.00	\$ 2,655.00
9/13/2022	BHC	Drafted email to defense counsel regarding case schedule [.4]. Telephone call with Ms. Terrell regarding case schedule [.5]. Video conference with Mr. Gibson regarding work on motion to compel defendants' tax returns [.5].	1.4	\$ 450.00	\$ 630.00
9/13/2022	BHC	Commenced drafting response to Defendants' motion to bifurcate [1.5].	1.5	\$ 450.00	\$ 675.00
9/14/2022	BHC	Worked on response to motion to bifurcate, discussed trial date, drafted email regarding same.	2.9	\$ 450.00	\$ 1,305.00



Date	Initials	Narrative	Units	Rate	Value
9/15/2022	BHC	Worked on response to motion to bifurcate [3]. Revised response to motion to bifurcate and approved all supporting documents for filing [1]. Personal meeting with Ms. Terrell regarding case management [.5]. Email to Mr. Jayne regarding AMEX subpoenas [.1]. Revised joint statement of evidence [.1]; sent same to all counsel and incorporated Ms. Butler's revision [.2]; approved same for filing and emailed to bailiff [.1]. Email to Mr. Flansberg regarding confirming Feoli deposition and production date [.1]. Email to all counsel regarding AMEX statement labeling [.1].	5.2	\$ 450.00	\$ 2,340.00
9/16/2022	BHC	Worked on witness time form [.5]. Video conference with defense counsel regarding witness time form and joint statement of evidence [.3]. Video conference with Mr. Coffing regarding potential settlement [.3]. Discussed response to motion for protective order with Mr. Gibson [.5].	1.6	\$ 450.00	\$ 720.00
9/17/2022	BHC	Email to Mr. Flansburg regarding Ms. Feoli's documents [.1]; exchanged emails with co-counsel and staff regarding same [.1]. Research related to piercing corporate veil for work on proposed conclusions of law [1.5]. Worked on jury instructions [1.5]. Worked on proposed findings of fact and conclusions of law [1.5]. Read and analyzed motion to strike experts [.5]; telephone conference with Ms. Terrell regarding same [.3]; legal research related to same [.4]. Read and analyzed motion for reconsideration [.3]; email to co-counsel regarding same [.1].	6.3	\$ 450.00	\$ 2,835.00
9/19/2022	BHC	Worked on response to motion for protective order [.9]; discussed same with Ms. Terrell [.2].	1.1	\$ 450.00	\$ 495.00
9/19/2022	BHC	Commenced review of Feoli documents [1.5]. Commenced drafting outline of Feoli deposition [3]. Email to Mr. Coffing in response to settlement offer [.8]. Email to all counsel regarding stipulated protective order and Feoli mass designation [.2]. Revised CR 43(f) notices and approved same for service [.2]. Email to clerk's office regarding electronic trial exhibit folder [.1]; exchanged emails with staff regarding same [.1].	5.9	\$ 450.00	\$ 2,655.00

Date	Initials	Narrative	Units	Rate	Value
9/20/2022	BHC	Meeting with staff regarding work on joint statement of evidence [.4]. Email to Mr. Coffing regarding blank messages received [.1]. Worked with Ms. Boschen on issues related to QuickBooks production from Ms. Feoli and exchanged emails with Mr. Flansburg regarding same [.6]. Responded to co-counsel regarding jury instructions [.3]. Worked on Tina Feoli deposition outline and sent to all counsel [.5]. Worked on response to defendants' second motion for protective order on tax returns [2.5]. Worked on motions in limine with co-counsel [1.5]. Exchanged emails with Ms. Butler regarding jury instructions and verdict form [.2]. Exchanged emails with Mr. Jayne regarding briefing schedule for motion to decertify class [.2].	6.3	\$ 450.00	\$ 2,835.00
9/21/2022	BHC	Read and analyzed Defendants' motions in limine [.5]; email to co-counsel regarding work on same [.2]. Reviewed motion to compel AMEX records [.2]. Research regarding Tussy's motion to strike experts [3.5]. Commenced drafting response to motion to strike experts [2.3]. Telephone conference with Ms. Butler regarding format of jury instruction submission [.2]. Completed Plaintiff's jury instructions, witness time form, and neutral statement; sent same to defense counsel [1]. Worked on supplemental juror questions; approved same for submission to Court [.4]; email to Court providing supplemental questions [.1]. Worked with staff on joint statement of evidence [.4].	8.8	\$ 450.00	\$ 3,960.00
9/22/2022	BHC	Completed response to motion to strike experts.	5	\$ 450.00	\$ 2,250.00
9/22/2022	BHC	Reviewed and analyzed motion to decertify class.	3.4	\$ 450.00	\$ 1,530.00

Date	Initials	Narrative	Units	Rate	Value
9/23/2022	BHC	Completed work on response to motion to strike experts [1.7]; reviewed and approved brief and supporting documents for filing [1.4]. Worked on Plaintiff's trial brief [2.5]. Worked on exhibits for Feoli deposition [1.8]; email to all counsel regarding Feoli deposition logistics [1.2]. Worked on discovery designations; approved same for service on defense counsel [1.4]. Exchanged emails with experts; discussed expert opinions with Ms. Terrell [1.4]. Email to and telephone call with Ms. Steiner regarding facts related to opposition to decertification motion [1.3]. Reviewed Defendants' offer of judgment and civil rules relating to same [1.3]; personal meeting regarding response to same with Ms. Murray [1.3].	8.3	\$ 450.00	\$ 3,735.00
9/24/2022	BHC	Telephone call with Ms. Terrell regarding offer of judgment [1.3]. Telephone conference with co-counsel regarding offer of judgment and trial preparation [1.7]. Completed draft of Plaintiff's trial brief and two potential additional jury instructions [5.5].	6.5	\$ 450.00	\$ 2,925.00
9/25/2022	BHC	Worked on trial brief and findings of fact and conclusions of law [3.5]. Meeting with experts regarding Feoli deposition preparation [1]. Worked on Feoli deposition preparation [1].	5.5	\$ 450.00	\$ 2,475.00
9/26/2022	BHC	Worked on trial brief, jury instructions, and findings of fact and conclusions of law for filing [1.5]. Prepared for Ms. Feoli's deposition [1.5]. Attended Feoli deposition [6.5]. Discussed Feoli deposition with co-counsel [1.3]. Worked on witness time form estimates [1.8]. Worked on joint statement of evidence [1.4]. Telephone call with Ms. Butler regarding filing joint statement of evidence [1.2].	10.2	\$ 450.00	\$ 4,590.00
9/27/2022	BHC	Scheduled meet and confer with Mr. Flansberg [1.1]; reviewed email from Court setting status hearing [1.1]. Analyzed class referral source data produced by Gantz; email to staff regarding further analysis for decertification response [1.4]. Worked on outline for Gantz deposition on search for documents [1.3].	1.9	\$ 450.00	\$ 855.00
9/27/2022	BHC	Worked on responses to Gintz's motions in limine.	4.8	\$ 450.00	\$ 2,160.00

Date	Initials	Narrative	Units	Rate	Value
9/28/2022	BHC	Drafted confession of judgment to accompany settlement [1.5]. Worked on issues related to finalizing settlement terms with Ms. Terrell [2].	3.5	\$ 450.00	\$ 1,575.00
9/29/2022	BHC	Left telephone messages for absent class member witnesses regarding settlement [.2]. Email to the Court regarding settlement [.2]. Drafted stipulated motion and proposed order to extend trial date in light of settlement [1.1]; obtained approval for same from all counsel and approved for filing [.3]. Exchanged emails and text messages with co-counsel regarding client signature on settlement [.3]. Email to Mr. Flansberg regarding no need to meet and confer [.1]. Email to expert confirming stop all work and produce final bill [.1].	2.3	\$ 450.00	\$ 1,035.00
9/30/2022	BHC	Reviewed court reporting bill and sent for payment [.1].	0.1	\$ 450.00	\$ 45.00
10/4/2022	BHC	Commenced drafting motion for preliminary approval [1.3]. Email to P&N requesting administration bid [.2]. Videoconference with co-counsel regarding drafting settlement notices [.4].	1.9	\$ 450.00	\$ 855.00
			<b>532.2</b>		<b>\$ 237,825.00</b>
8/21/2020	BKK	Prepared draft of Stout declaration [.3]; prepared draft of Proudlove declaration [.3].	0.6	\$ 125.00	\$ 75.00
10/7/2020	BKK	Reviewed, revised and finalized reply in support of motion to compel [.2]; prepared draft and finalized declaration of service [.1]; arranged filing and service [1]; arranged delivery of chambers copies [.1].	1.4	\$ 125.00	\$ 175.00
10/19/2020	BKK	Reviewed Sanders notice of intent to withdraw [.1]; amended master declaration of service [.1].	0.2	\$ 125.00	\$ 25.00
			<b>2.2</b>		<b>\$ 275.00</b>
7/7/2022	CC	Docket and briefing review [.6]; research on personal jurisdiction legal question [1].	1.6	\$ 200.00	\$ 320.00
7/8/2022	CC	Personal jurisdiction research [2.5].	2.5	\$ 200.00	\$ 500.00
7/11/2022	CC	Personal jurisdiction research [3.5]; personal jurisdiction jury instructions research [1.5]; email memo drafting [.4].	5.4	\$ 200.00	\$ 1,080.00

Date	Initials	Narrative	Units	Rate	Value
7/12/2022	CC	Personal call regarding PJ memo [.2]; researched jury question [1.2]; researched personal jurisdiction question [1.3].	2.7	\$ 200.00	\$ 540.00
7/13/2022	CC	PJ memo research [2.4].	2.4	\$ 200.00	\$ 480.00
7/14/2022	CC	PJ research [6].	6	\$ 200.00	\$ 1,200.00
7/15/2022	CC	PJ memo write up [1]; additional research [1.3].	2.3	\$ 200.00	\$ 460.00
7/18/2022	CC	PJ memo drafting [2].	2	\$ 200.00	\$ 400.00
7/19/2022	CC	Memo drafting [1.8].	1.8	\$ 200.00	\$ 360.00
7/21/2022	CC	Research on how to domesticate a foreign deposition subpoena in NV [3.4]; email correspondence [.4].	3.8	\$ 200.00	\$ 760.00
7/26/2022	CC	Drafting PJ memo [2.5].	2.5	\$ 200.00	\$ 500.00
7/28/2022	CC	PJ memo research and drafting [7.5].	7.5	\$ 200.00	\$ 1,500.00
7/29/2022	CC	Personal jurisdiction memo research and drafting [5.7].	5.7	\$ 200.00	\$ 1,140.00
8/1/2022	CC	Drafting PJ memo [6.8].	6.8	\$ 200.00	\$ 1,360.00
8/30/2022	CC	Collateral source rule legal research [4].	4	\$ 200.00	\$ 800.00
8/31/2022	CC	Collateral Source rule research [6]	6	\$ 200.00	\$ 1,200.00
9/1/2022	CC	Collateral source rule research and drafting [6].	6	\$ 200.00	\$ 1,200.00
9/2/2022	CC	Collateral source rule research [2].	2	\$ 200.00	\$ 400.00
9/6/2022	CC	Collateral source rule memo research and writing [4].	4	\$ 200.00	\$ 800.00
9/7/2022	CC	Collateral source rule memo drafting [7] meeting re the same [.3].	7.3	\$ 200.00	\$ 1,460.00
9/8/2022	CC	Drafting collateral source rule memo [9].	9	\$ 200.00	\$ 1,800.00
			<b>91.3</b>		<b>\$ 18,260.00</b>
1/12/2022	CV	Conducted PeopleMap searches for class notice [0.5]	0.5	\$ 125.00	\$ 62.50
1/13/2022	CV	Conducted PeopleMap searches for class notice [4.0]	4	\$ 125.00	\$ 500.00
1/14/2022	CV	Conducted PeopleMap searches for class notice [0.5], Stamped mailing notices [0.5]	1	\$ 125.00	\$ 125.00
2/8/2022	CV	Printing and binder project for KC [3.5]	3.5	\$ 125.00	\$ 437.50
			<b>9</b>		<b>\$ 1,125.00</b>
9/15/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00
9/28/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00
9/28/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00
10/5/2020	DL	Worked on docketing [0.1]	0.1	\$ 125.00	\$ 12.50

Date	Initials	Narrative	Units	Rate	Value
10/5/2020	DL	Worked on docketing [0.1]	0.1	\$ 125.00	\$ 12.50
10/7/2020	DL	Worked on docketing [0.1]	0.1	\$ 125.00	\$ 12.50
10/19/2020	DL	Worked on docketing [0.1]	0.1	\$ 125.00	\$ 12.50
10/19/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00
10/21/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50
10/21/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50
10/22/2020	DL	Worked on docketing [0.6]	0.6	\$ 125.00	\$ 75.00
11/3/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50
11/12/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50
11/13/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50
11/16/2020	DL	Worked on docketing [0.3]	0.3	\$ 125.00	\$ 37.50
11/23/2020	DL	Worked on docketing [0.2]	0.2	\$ 125.00	\$ 25.00
			<b>3.8</b>		<b>\$ 475.00</b>
10/5/2021	EBN	Worked on factual research regarding defendants' affiliated companies.	0.8	\$ 325.00	\$ 260.00
10/19/2021	EBN	Worked on checklist for notice plan; worked on issues regarding class notice and notice plan estimate.	2	\$ 325.00	\$ 650.00
10/22/2021	EBN	Revised postcard class notice; email correspondence regarding revisions.	1	\$ 325.00	\$ 325.00
10/25/2021	EBN	Revised long form notice; email correspondence regarding same.	1.5	\$ 325.00	\$ 487.50
11/4/2021	EBN	Reviewed and revised class notice regarding sub-class definition; email correspondence regarding same.	0.3	\$ 325.00	\$ 97.50
11/12/2021	EBN	Worked on motion to approve plaintiff's proposed notice plan [3]; reviewed notice plan cost estimate; email correspondence regarding same [5].	3.5	\$ 325.00	\$ 1,137.50
11/16/2021	EBN	Worked on motion to approve class notice [1.5]; reviewed defendants' revisions to website notice [5].	2	\$ 325.00	\$ 650.00
11/17/2021	EBN	Personal conference with staff regarding class notice website design [4]; email correspondence to co-counsel regarding same [2]; worked on motion to approve class notice; worked on declaration of Ms. Chandler regarding same [2.5]; worked on class notice forms [2].	5.1	\$ 325.00	\$ 1,657.50
1/6/2022	EBN	Worked on issues regarding class certification notice.	0.6	\$ 325.00	\$ 195.00

Date	Initials	Narrative	Units	Rate	Value
1/11/2022	EBN	Worked on issues regarding class certification notice.	0.7	\$ 325.00	\$ 227.50
1/12/2022	EBN	Worked on issues regarding class certification notice; worked on issues regarding class notice website.	2	\$ 325.00	\$ 650.00
1/13/2022	EBN	Worked on issues regarding class certification notice [1]; worked on issues regarding class notice website [1].	2	\$ 325.00	\$ 650.00
1/14/2022	EBN	Worked on issues regarding class certification notice.	0.3	\$ 325.00	\$ 97.50
1/18/2022	EBN	Worked on issues regarding class certification notice.	0.2	\$ 325.00	\$ 65.00
5/23/2022	EBN	Worked on legal research regarding piercing corporate veil and sanctions for failure to obey discovery order.	4.5	\$ 325.00	\$ 1,462.50
5/24/2022	EBN	Worked on legal research regarding motion for sanctions; reviewed and analyzed draft motion for sanctions; prepared summary of same.	7	\$ 325.00	\$ 2,275.00
5/25/2022	EBN	Worked on revising motion for sanctions.	7	\$ 325.00	\$ 2,275.00
5/26/2022	EBN	Worked on motion for sanctions.	2	\$ 325.00	\$ 650.00
5/27/2022	EBN	Worked on motion for sanctions; worked on declaration of Paul Arons in support of same; worked on exhibits to declaration; coordinated filing of motion.	7	\$ 325.00	\$ 2,275.00
6/7/2022	EBN	Email correspondence with co-counsel regarding litigation hold letter and issues regarding motion for sanctions.	0.7	\$ 325.00	\$ 227.50
6/8/2022	EBN	Worked on reply in support of motion for sanctions.	6	\$ 325.00	\$ 1,950.00
6/9/2022	EBN	Worked on reply in support of motion for sanctions; worked on Arons declaration in support of same; coordinated filing same.	7	\$ 325.00	\$ 2,275.00
6/21/2022	EBN	Attended case management meeting with co-counsel regarding trial preparation [1.2]; reviewed trial preparation task list [.2].	1.4	\$ 325.00	\$ 455.00
6/29/2022	EBN	Participated in trial planning meeting with co-counsel.	1	\$ 325.00	\$ 325.00
7/5/2022	EBN	Reviewed and analyzed order granting motion for sanctions.	0.2	\$ 325.00	\$ 65.00
7/11/2022	EBN	Worked on motion to determine fee award.	2	\$ 325.00	\$ 650.00
7/12/2022	EBN	Email correspondence regarding motion for fees.	0.2	\$ 325.00	\$ 65.00
7/13/2022	EBN	Email correspondence regarding motion to determine fees; reviewed sample fee declarations and orders.	1	\$ 325.00	\$ 325.00
7/14/2022	EBN	Worked on fee report regarding motion to determine fees for motion for sanctions.	0.5	\$ 325.00	\$ 162.50
7/15/2022	EBN	Email correspondence regarding docketing issue [.2]; worked on declarations in support of motion to determine fee award [.5]	0.7	\$ 325.00	\$ 227.50

Date	Initials	Narrative	Units	Rate	Value
7/18/2022	EBN	Worked on motion to determine fee award; revised declaration of Paul Arons in support of same; worked on declaration of Ms. Chandler in support of same; worked on proposed order granting motion to determine fee award.	2.2	\$ 325.00	\$ 715.00
7/19/2022	EBN	Revised motion to determine fee award; revised Chandler declaration and exhibits in support of same; forwarded same to co-counsel for review; coordinated motion filing.	3.5	\$ 325.00	\$ 1,137.50
7/20/2022	EBN	Worked on issues regarding domesticating foreign subpoena for deposition of Tina Feoli [.8]; worked on case file management [.2].	1	\$ 325.00	\$ 325.00
7/21/2022	EBN	Reviewed and revised discovery letter to Mr. Jayne [.2]; email correspondence with Ms. Chen regarding research into foreign subpoena procedures; reviewed research [.7].	0.9	\$ 325.00	\$ 292.50
7/22/2022	EBN	Worked on exhibit A to deposition subpoena to Ms. Feoli; circulated same to co-counsel; worked on issues regarding domesticating foreign subpoena.	1.5	\$ 325.00	\$ 487.50
7/25/2022	EBN	Worked on subpoena to Ms. Feoli.	1.2	\$ 325.00	\$ 390.00
7/26/2022	EBN	Worked on subpoena documents and coordinated foreign deposition request filing in Nevada state court.	0.7	\$ 325.00	\$ 227.50
7/28/2022	EBN	Reviewed reply brief in support of motion to determine attorneys' fees award for motion for sanctions.	0.2	\$ 325.00	\$ 65.00
8/1/2022	EBN	Worked on issues regarding foreign deposition subpoena to Ms. Feoli.	0.2	\$ 325.00	\$ 65.00
8/3/2022	EBN	Reviewed and revised motion to clarify order denying in part motion for default judgment and summary judgment; reviewed and revised proposed order granting same; reviewed and revised declaration of service; worked on issue regarding exhibit to Chandler declaration in support of same [1]; worked on issues regarding deposition subpoena to Ms. Feoli [.2].	1.2	\$ 325.00	\$ 390.00
8/4/2022	EBN	Reviewed final subpoena documents for service on Ms. Feoli.	0.3	\$ 325.00	\$ 97.50
8/9/2022	EBN	Worked on subpoena duces tecum to American Express.	0.4	\$ 325.00	\$ 130.00
8/12/2022	EBN	Participated in witness preparation meeting for deposition of Beth Wills.	1.4	\$ 325.00	\$ 455.00



Date	Initials	Narrative	Units	Rate	Value
8/15/2022	EBN	Participated in deposition preparation meeting with Ms. Wills and co-counsel.	1.2	\$ 325.00	\$ 390.00
8/16/2022	EBN	Participated in preparation session for deposition of Ms. Jurgemeyer.	1.5	\$ 325.00	\$ 487.50
8/17/2022	EBN	Telephone conference with Ms. Barrett and co-counsel regarding preparation for deposition [.3]; attended deposition of Ms. Barrett [2.6].	2.9	\$ 325.00	\$ 942.50
8/18/2022	EBN	Reviewed and revised notes from Barrett deposition.	0.4	\$ 325.00	\$ 130.00
8/29/2022	EBN	Strategy meeting with team regarding ER 904 designations and trial exhibit preparation.	1	\$ 325.00	\$ 325.00
8/30/2022	EBN	Participated in deposition preparation meeting with Patty Neil [1.3]; forwarded Zoom information for deposition to witness [.3]; worked on issues regarding witness contact information [.3].	1.9	\$ 325.00	\$ 617.50
8/31/2022	EBN	Worked on document review for ER 904 disclosures; email correspondence regarding ER 904 disclosures [3.8]; reviewed draft jury instructions; participated in strategy meeting with co-counsel regarding jury instructions [1.6]	5.4	\$ 325.00	\$ 1,755.00
9/1/2022	EBN	Worked on issues regarding ER 904 designations.	1	\$ 325.00	\$ 325.00
9/2/2022	EBN	Reviewed ER 904 designations; email correspondence regarding documents to add to disclosure.	0.3	\$ 325.00	\$ 97.50
9/7/2022	EBN	Worked on issues regarding class member deposition transcripts.	0.2	\$ 325.00	\$ 65.00
9/8/2022	EBN	Worked on issues regarding trial exhibits.	0.5	\$ 325.00	\$ 162.50
9/9/2022	EBN	Personal conference with co-counsel regarding trial preparation and trial schedule [1]; worked on joint confirmation of trial readiness form [.2];	1.2	\$ 325.00	\$ 390.00
9/12/2022	EBN	Worked on issues regarding trial witness list; reviewed illustrative summary exhibits.	0.2	\$ 325.00	\$ 65.00
9/16/2022	EBN	Reviewed juror questionnaire; email correspondence regarding same.	0.2	\$ 325.00	\$ 65.00
9/19/2022	EBN	Reviewed class member deposition transcript.	2	\$ 325.00	\$ 650.00
9/21/2022	EBN	Reviewed deposition of Patricia Neil for errors; noted corrections regarding same [2]; reviewed and analyzed defendants' motions in limine [1].	3	\$ 325.00	\$ 975.00

Date	Initials	Narrative	Units	Rate	Value	
9/22/2022	EBN	Worked on proposed findings of fact and conclusions of law [1]; reviewed class member Jurgemeyer's deposition transcript; noted corrections [2.5]; forwarded transcripts to class members for review [.5]	4	\$ 325.00	\$	1,300.00
9/23/2022	EBN	Worked on legal research regarding responses to defendants' motions in limine; worked on responses to defendants' motions in limine; personal conference with Ms. Nusser regarding same.	4.6	\$ 325.00	\$	1,495.00
9/25/2022	EBN	Worked on responses to Defendant Tussy's motions in limine.	3.2	\$ 325.00	\$	1,040.00
9/26/2022	EBN	Reviewed and made corrections to trial brief [1]; worked on responses to Gintz's motions in limine [4]; worked on issues regarding joint statement of evidence [1]; reviewed deposition transcript of Martha Hills [1].	7	\$ 325.00	\$	2,275.00
9/27/2022	EBN	Worked on responses to defendants' motions in limine; coordinated filing of same.	5	\$ 325.00	\$	1,625.00
			<b>131.6</b>		<b>\$</b>	<b>26,097.50</b>
10/25/2021	EAA	Worked on research regarding enforcement of judgments in Nevada,	2	\$ 425.00	\$	850.00
10/26/2021	EAA	Completed research regarding enforcing judgments in Nevada.	4	\$ 425.00	\$	1,700.00
12/6/2021	EAA	Personal conference regarding research on personal jurisdiction over corporate officers [0.2]; completed research regarding same [0.8].	1	\$ 425.00	\$	425.00
12/7/2021	EAA	Reviewed personal jurisdiction briefing in preparation for drafting response to summary judgment motion regarding same [0.5].	0.5	\$ 425.00	\$	212.50
12/9/2021	EAA	Worked on research regarding personal jurisdiction over corporate officers.	0.8	\$ 425.00	\$	340.00
1/6/2022	EAA	Prepped for moot argument on defendants' motion for summary judgment on personal jurisdiction [1.4]; participated in moot argument [1.0]; transported documents [0.2].	2.6	\$ 425.00	\$	1,105.00
			<b>10.9</b>		<b>\$</b>	<b>4,632.50</b>
12/2/2020	ET	Docketed deadlines [0.6]	0.6	\$ 125.00	\$	75.00

Date	Initials	Narrative	Units	Rate	Value
		Researched court rules, reviewed case documents, and corresponded with Jessica [0.6];			
12/3/2020	ET	Docketed deadlines [0.2]	0.8	\$ 125.00	\$ 100.00
		Docketed deadlines [0.3];			
12/18/2020	ET	Communicated with team regarding docketing [0.1]	0.4	\$ 125.00	\$ 50.00
12/23/2020	ET	Docketed deadlines [0.7]	0.7	\$ 125.00	\$ 87.50
		Docketed deadlines [0.3];			
12/29/2020	ET	Corresponded with Jessica regarding docketing best practices [0.2]	0.5	\$ 125.00	\$ 62.50
1/15/2021	ET	Docketed deadlines [0.2]	0.2	\$ 125.00	\$ 25.00
1/21/2021	ET	Consulted with Jessica about docketing, and docketed deadlines [0.3]	0.3	\$ 125.00	\$ 37.50
2/3/2021	ET	Calculated current and proposed deadlines for draft motion [0.4]	0.4	\$ 125.00	\$ 50.00
		Docketed deadlines [0.2];			
2/8/2021	ET	Filed documents in ProLaw [0.2]	0.4	\$ 125.00	\$ 50.00
2/12/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50
2/16/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50
2/24/2021	ET	Docketed deadlines [0.2]	0.2	\$ 125.00	\$ 25.00
3/4/2021	ET	Docketed deadlines [0.3]	0.3	\$ 125.00	\$ 37.50
3/5/2021	ET	Corrected docketing error [0.1]	0.1	\$ 125.00	\$ 12.50
3/8/2021	ET	Docketed deadlines [0.2]	0.2	\$ 125.00	\$ 25.00
3/15/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50
4/21/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50
4/22/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50
4/23/2021	ET	Updated docket to include Amanda [0.1]	0.1	\$ 125.00	\$ 12.50
4/29/2021	ET	Docketed deadlines [0.3]	0.3	\$ 125.00	\$ 37.50
4/30/2021	ET	Docketed deadlines [0.1]	0.1	\$ 125.00	\$ 12.50
5/11/2021	ET	Docketed deadlines and asked team docketing question [0.3]	0.3	\$ 125.00	\$ 37.50
		Coordinated team re finding class member addresses [0.5];			
1/13/2022	ET	Searched for class member addresses [3]	3.5	\$ 125.00	\$ 437.50
1/14/2022	ET	Prepared class notice postcards for mailing [2]	2	\$ 125.00	\$ 250.00
1/24/2022	ET	Reviewed documents for emails relevant to summary judgment motion [2]	2	\$ 125.00	\$ 250.00
3/1/2022	ET	Created hearing binder for Blythe [3]	3	\$ 125.00	\$ 375.00

Date	Initials	Narrative	Units	Rate	Value
4/4/2022	ET	Created case deadline chart for motion to revise schedule [0.3]	0.3	\$ 125.00	\$ 37.50
			<b>17.2</b>		<b>\$ 2,150.00</b>
8/3/2021	GW	Reviewed draft for class action member certification motion and reviewed documents.	2.5	\$ 200.00	\$ 500.00
8/5/2021	GW	Conducted document review and identified relevant evidence.	5.9	\$ 200.00	\$ 1,180.00
8/10/2021	GW	Conducted document review.	6.2	\$ 200.00	\$ 1,240.00
8/11/2021	GW	Conducted document review for potential facts and evidence to be cited in motion for class certification and personal jurisdiction.	8.2	\$ 200.00	\$ 1,640.00
8/13/2021	GW	Conducted document review.	1.1	\$ 200.00	\$ 220.00
8/16/2021	GW	Reviewed case strategies and timelines, and identified types of evidence to obtain from document review.	0.5	\$ 200.00	\$ 100.00
8/17/2021	GW	Conducted document review of new production documents.	1.9	\$ 200.00	\$ 380.00
8/18/2021	GW	Telephone conference with Ms. Steiner, Ms. Chandler, and Ms. Langsted regarding new production documents [0.5]; reviewed new production documents [1.2].	1.7	\$ 200.00	\$ 340.00
8/19/2021	GW	Reviewed documents in new batch of discovery production.	7.3	\$ 200.00	\$ 1,460.00
8/20/2021	GW	Reviewed documents in new discovery production.	7.9	\$ 200.00	\$ 1,580.00
8/23/2021	GW	Reviewed documents.	7.6	\$ 200.00	\$ 1,520.00
8/24/2021	GW	Reviewed documents from most recent batch of production and identified evidence supporting class certification motion.	7.9	\$ 200.00	\$ 1,580.00
8/25/2021	GW	Identified relevant evidence for class certification motion draft and conducted document review.	8.1	\$ 200.00	\$ 1,620.00
8/27/2021	GW	Compiled relevant evidence for class certification draft.	3.1	\$ 200.00	\$ 620.00
			<b>69.9</b>		<b>\$ 13,980.00</b>
2/11/2021	HK	Commenced filing review.	1.2	\$ 125.00	\$ 150.00
2/16/2021	HK	Worked on document review.	1.6	\$ 125.00	\$ 200.00
2/18/2021	HK	Worked on document review.	3.2	\$ 125.00	\$ 400.00
2/25/2021	HK	Continued document review.	0.8	\$ 125.00	\$ 100.00
3/5/2021	HK	Continued document review.	0.8	\$ 125.00	\$ 100.00
3/9/2021	HK	Continued document review.	2.1	\$ 125.00	\$ 262.50
1/13/2022	HK	Conducted PeopleMap searches for class notice.	4.6	\$ 125.00	\$ 575.00
			<b>14.3</b>		<b>\$ 1,787.50</b>

Date	Initials	Narrative	Units	Rate	Value
8/24/2020	HB	Prepared and finalized declaration and exhibits in support of response to defendants' motion to dismiss [1.8].	1.8	\$ 150.00	\$ 270.00
11/3/2020	HB	Finalized and electronically filed confirmation of joinder [.6].	0.6	\$ 150.00	\$ 90.00
6/14/2021	HB	Reviewed documents in Ipro and updated production log [.5].	0.5	\$ 150.00	\$ 75.00
6/15/2021	HB	Loaded document production into Ipro and updated production log [.2].	0.2	\$ 150.00	\$ 30.00
6/24/2021	HB	Prepared draft subpoena package documents to Yahoo [1.4].	1.4	\$ 150.00	\$ 210.00
9/30/2021	HB	Set up shell documents for reply in support of class certification [.3].	0.3	\$ 150.00	\$ 45.00
10/5/2021	HB	Finalized and e-filed response to surreply re motion for class certification [.5].	0.5	\$ 150.00	\$ 75.00
10/18/2021	HB	Finalized discovery meet and confer letter [.3].	0.3	\$ 150.00	\$ 45.00
11/8/2021	HB	Finalized joint prosecution agreement and transmitted same to co-counsel [.3].	0.3	\$ 150.00	\$ 45.00
2/2/2022	HB	Worked on exhibits in support of motion for summary judgment [2.9].	2.9	\$ 150.00	\$ 435.00
2/3/2022	HB	Worked on exhibits in support of motion for summary judgment [3.7].	3.7	\$ 150.00	\$ 555.00
2/4/2022	HB	Worked on declaration and exhibits in support of motion for summary judgment [3.6].	3.6	\$ 150.00	\$ 540.00
2/28/2022	HB	Worked on exhibits in support of mediation brief [1.7].	1.7	\$ 150.00	\$ 255.00
3/1/2022	HB	Worked on exhibit list for mediation exhibits [.4].	0.4	\$ 150.00	\$ 60.00
3/14/2022	HB	Teleconference regarding trial preparation [.4].	0.4	\$ 150.00	\$ 60.00
9/20/2022	HB	Worked on and finalized exhibits in support of motions in limine [.5].	0.5	\$ 150.00	\$ 75.00
9/22/2022	HB	Worked on exhibits in support of response to motion to strike experts [1.0].	1	\$ 150.00	\$ 150.00
9/23/2022	HB	Worked on declaration and exhibits in support of response to motion to strike experts [2.7].	2.7	\$ 150.00	\$ 405.00
9/26/2022	HB	Converted defendant's declaration to Word for word count [.3].	0.3	\$ 150.00	\$ 45.00
			<b>23.1</b>		<b>\$ 3,465.00</b>

Date	Initials	Narrative	Units	Rate	Value
5/22/2020	HMR	Worked on and finalized complaint, summons (2) and civil cover sheet; electronically filed same; emailed same along with CICS and order setting civil case schedule to co-counsel.	1	\$ 150.00	\$ 150.00
5/26/2020	HMR	Coordinated with ABC Legal for service of complaint, summons, civil coversheet, order setting civil case schedule and CICS.	0.4	\$ 150.00	\$ 60.00
5/29/2020	HMR	Confirmed service was made; pulled proof of service; sent to docketing and filing.	0.3	\$ 150.00	\$ 45.00
6/10/2020	HMR	Worked on Plaintiff's first set of interrogatories and requests for production of documents.	0.6	\$ 150.00	\$ 90.00
7/1/2020	HMR	Emailed signed proofs of service to co-counsel.	0.4	\$ 150.00	\$ 60.00
7/20/2020	HMR	Worked on and finalized notice of appearance and declaration of service for Blythe Chandler; electronically filed same. [.3] registered for electronic service for Beth Terrell and Blythe Chandler [.3]; pulled filed pleadings off of King County ECR and saved to PL [.4]; checked with ABC Legal on service of subpoena to CitiBank [.1].	1.1	\$ 150.00	\$ 165.00
8/24/2020	HMR	Worked on and finalized plaintiff's response to defendant's motion to dismiss, declaration of Blythe H. Chandler in support of same, exhibits 1-8, declaration of Douglas Proudlove, declaration of Sarah Stout, index of non-Washington authorities, pulled cases from Westlaw for same, declaration of service and proposed order; electronically filed same; submitted judges' working copies of same.	1	\$ 150.00	\$ 150.00
8/25/2020	HMR	Submitted judges' working copies of plaintiff's response to defendant's motion to dismiss and supporting documents.	0.5	\$ 150.00	\$ 75.00
9/28/2020	HMR	Worked on and finalized Plaintiff's motion to compel and for fees and costs, declaration of Paul Arons in support of same, proposed order, note for motion and declaration of service; electronically filed same.	1	\$ 150.00	\$ 150.00
10/5/2020	HMR	Worked on and finalized plaintiff's response to defendant's motion to stay, index of non-Washington authority, proposed order and declaration of service; electronically filed same.	0.6	\$ 150.00	\$ 90.00
10/6/2020	HMR	Submitted judges' working copies of Plaintiff's motion to compel.	0.4	\$ 150.00	\$ 60.00

Date	Initials	Narrative	Units	Rate	Value
10/13/2020	HMR	Worked on confirmation of joinder of parties, claims, and defenses [.3]	0.3	\$ 150.00	\$ 45.00
10/20/2020	HMR	Worked on and finalized response to notice of intent to seek discretionary review; electronically filed same [1]; worked on master appeal caption [.3]	1.3	\$ 150.00	\$ 195.00
10/22/2020	HMR	Worked on and finalized letter to Mr. Coffing regarding defendant Seed Capital; emailed same.	0.5	\$ 150.00	\$ 75.00
10/23/2020	HMR	Printed and mailed complaint to attorney general.	0.4	\$ 150.00	\$ 60.00
11/16/2020	HMR	Submitted judges' working copies of plaintiff's motion to name doe defendants and file amended class action complaint.	0.3	\$ 150.00	\$ 45.00
11/20/2020	HMR	Worked on and finalized letter to counsel regarding settlement demand. Worked on and finalized reply in support of plaintiff's motion for leave to amend and declaration of service; electronically filed same; submitted judges' working copies of same; printed and mailed same to registered agent for defendant.	0.4	\$ 150.00	\$ 60.00
11/23/2020	HMR	Finalized first amended complaint and declaration of service; electronically filed same; printed and mailed same to registered agent for defendant.	1	\$ 150.00	\$ 150.00
12/1/2020	HMR	Worked on and finalized waiver of service of summons for Kevin Tussy and Erik Gantz; emailed same along with first amended complaint, civil case schedule and summons to counsel for all parties; electronically filed	0.4	\$ 150.00	\$ 60.00
12/3/2020	HMR	Worked on plaintiff's motion for class certification.	1	\$ 150.00	\$ 150.00
1/12/2021	HMR	Worked on response to defendants motion to dismiss and master caption. Called ex parte clerk regarding rejected submission; updated motion and signature line on proposed order and electronically submitted via ex parte again.	0.4	\$ 150.00	\$ 60.00
3/25/2021	HMR	Worked on response to defendants motion to dismiss and master caption. Called ex parte clerk regarding rejected submission; updated motion and signature line on proposed order and electronically submitted via ex parte again.	0.5	\$ 150.00	\$ 75.00
4/28/2021	HMR	Worked on response to defendants motion to dismiss and master caption. Called ex parte clerk regarding rejected submission; updated motion and signature line on proposed order and electronically submitted via ex parte again.	0.5	\$ 150.00	\$ 75.00

Date	Initials	Narrative	Units	Rate	Value
4/29/2021	HMR	Worked on and finalized reply in support of motion for default, proposed order and declaration of service; worked on and finalized response to motion for protective order, declaration of Paul Arons with exhibits 1-8, proposed order and declaration of service; electronically filed same; submitted judges working copies of same [2]; ordered transcript of hearing on motion to dismiss via king county clerk; emailed transcript to Reed Jackson Watkins, LLC for transcription [.5]	2.5	\$ 150.00	\$ 375.00
5/10/2021	HMR	Worked on second set of interrogatories and requests for production of documents to defendants Erik Gantz and Kevin Tussy; emailed same to Paul Arons.	0.5	\$ 150.00	\$ 75.00
6/2/2021	HMR	Worked on and finalized unopposed motion to revise case schedule, note for motion, proposed order and declaration of service; electronically filed same; submitted judges' working copies.	0.7	\$ 150.00	\$ 105.00
6/7/2021	HMR	Worked on and finalized plaintiff's demand for jury trial and declaration of service; electronically filed same.	0.5	\$ 150.00	\$ 75.00
6/15/2021	HMR	Worked on and finalized notice of unavailability and declaration of service; electronically filed same.	0.4	\$ 150.00	\$ 60.00
7/7/2021	HMR	Worked on and finalized subpoena to produce documents directed to Oath Inc., letter enclosing same, exhibit a, declaration of records custodian; coordinated service of same with Seattle Legal Messengers. [.5]	0.5	\$ 150.00	\$ 75.00
7/13/2021	HMR	Worked on and finalized plaintiff's third set of requests for production of documents directed to Erik Gantz and declaration of service [.5]	0.5	\$ 150.00	\$ 75.00
8/31/2021	HMR	Worked on and finalized notice of deposition directed to Erik Gantz and directed to Kevin Tussy and declaration of service [.4]	0.4	\$ 150.00	\$ 60.00
9/15/2021	HMR	Worked on proposed order granting plaintiff's motion for class certification, declaration of Douglas Proudlove in support of same, declaration of Blythe H. Chandler in support of plaintiff's motion for class certification.	0.5	\$ 150.00	\$ 75.00



Date	Initials	Narrative	Units	Rate	Value
9/23/2021	HMR	Worked on plaintiff's motion for class certification, note for motion, proposed order, declaration of Sam Leonard, declaration of Paul Arons, declaration of Blythe H. Chandler, exhibits 1-29, declaration of Douglas Proudlove, exhibits a-f, index of non-Washington authorities, declaration of service; electronically filed same; submitted judges' working copies [2]	2	\$ 150.00	\$ 300.00
10/4/2021	HMR	Worked on and finalized plaintiff's reply in support of motion for class certification, declaration of Paul Arons, exhibits 30-60, index of non-Washington authorities and declaration of service; electronically filed same; submitted judges' working copies [1.5]	1.5	\$ 150.00	\$ 225.00
11/17/2021	HMR	Worked on and finalized motion to approve class notice, declaration of Blythe H. Chandler, exhibits 1-3, proposed order, notice of motion and declaration of service; electronically filed same; submitted judges' working copies [1.5]	1.5	\$ 150.00	\$ 225.00
11/29/2021	HMR	Worked on and finalized reply in support of motion to approve class notice and declaration of service; electronically filed same; submitted judges' working copies [.5]	0.5	\$ 150.00	\$ 75.00
12/21/2021	HMR	Worked on and finalized plaintiff's motion to compel, note for motion, proposed order, declaration of Paul Arons, exhibits 1-8, index of non-Washington authorities, declaration of service; electronically filed same; submitted judges' working copies [1.5]	1.5	\$ 150.00	\$ 225.00
12/27/2021	HMR	Worked on and finalized response to motion for summary judgment, declaration of Blythe H. Chandler, exhibits 1-54, proposed order, index of non-Washington authorities, declaration of service; electronically filed same; submitted judges' working copies [1.5]	1.5	\$ 150.00	\$ 225.00
1/3/2022	HMR	Worked on and finalized note for motion and declaration of service; reply in support of motion to compel, supplemental declaration of Paul Arons, exhibit 9, declaration of service; electronically filed same; submitted judges' working copies [1]	1	\$ 150.00	\$ 150.00

Date	Initials	Narrative	Units	Rate	Value
2/4/2022	HMR	Worked on plaintiff's motion for summary judgment, declaration of Toney Clark, declaration of Patricia Neil, declaration of Florence Barrett, declaration of Douglas Proudlove, declaration of Amanda Miller, declaration of Alexander Day, declaration of Blythe H. Chandler, exhibits 1-64, proposed order, note for motion, declaration of service and index of non-Washington authorities; electronically filed same; submitted judges working copies of same [1.5]	1.5	\$ 150.00	\$ 225.00
2/28/2022	HMR	Worked on and finalized reply in support of motion for summary judgment, appendix a, declaration of service; electronically filed same; submitted judges' working copies [.6]	0.6	\$ 150.00	\$ 90.00
3/1/2022	HMR	Worked on and finalized plaintiff's mediation statement and exhibits 1-25 [.5]	0.5	\$ 150.00	\$ 75.00
3/14/2022	HMR	Worked on and finalized plaintiff's opposition to defendants motion for clarification, exhibit 1, proposed order and declaration of service; electronically filed same; submitted judges' working copies [1]	1	\$ 150.00	\$ 150.00
4/7/2022	HMR	Worked on and finalized stipulated motion and proposed order to amend case schedule, note for motion, declaration of service; electronically filed same; submitted judges' working copies [1]	1	\$ 150.00	\$ 150.00
4/21/2022	HMR	Worked on and finalized letter to counsel regarding discovery conference; emailed same to counsel for all parties [.4]	0.4	\$ 150.00	\$ 60.00
5/27/2022	HMR	Worked on and finalized plaintiff's motion for sanctions, proposed order, declaration of Paul Arons, exhibits 1-24, note for motion and declaration of service; electronically filed same; submitted judges working copies [1.5]	1.5	\$ 150.00	\$ 225.00
6/9/2022	HMR	Worked on and finalized reply in support of motion for sanctions, supplemental declaration of Paul Arons, exhibits 25-36, index of non-Washington authorities cited in reply, declaration of service; electronically filed same; submitted judges' working copies [1.5]	1.5	\$ 150.00	\$ 225.00

Date	Initials	Narrative	Units	Rate	Value
7/19/2022	HMR	Worked on and finalized motion to determine fee amount, declaration of Blythe H. Chandler, exhibits 1-2, declaration of Paul Arons, exhibit 1, note for motion, proposed order, declaration of service; electronically filed same; submitted judges' working copies of same [1.5]	1.5	\$ 150.00	\$ 225.00
7/21/2022	HMR	Worked on and finalized letter to Collin Jayne regarding discovery issues [.1]	0.1	\$ 150.00	\$ 15.00
7/25/2022	HMR	Worked on and finalized notice of intent to serve subpoena on Ms. Feoli and declaration of service; emailed same to counsel for all parties [.4]	0.4	\$ 150.00	\$ 60.00
7/25/2022	HMR	Worked on and finalized notice of deposition directed to Erik Gantz and Kevin Tussy and declaration of service. [.4]	0.4	\$ 150.00	\$ 60.00
7/26/2022	HMR	Worked on and finalized request for foreign subpoena, Nevada state subpoena directed to Ms. Feoli, cover sheet, declaration of records custodian, Washington state subpoena directed to Ms. Feoli [1]	1	\$ 150.00	\$ 150.00
7/26/2022	HMR	Worked on and finalize letter to Mary Butler regarding discovery issues [-2]	0.2	\$ 150.00	\$ 30.00
8/3/2022	HMR	Worked on and finalized motion to clarify, declaration of Blythe H. Chandler, note for motion, proposed order, exhibit 1, declaration of service; electronically filed same; submitted judges working copies [1]	1	\$ 150.00	\$ 150.00
8/4/2022	HMR	Coordinated service of subpoena on Ms. Feoli [.3]	0.3	\$ 150.00	\$ 45.00
8/9/2022	HMR	Worked on and finalized subpoena duces tecum directed to American Express, notice of intent to serve, letter enclosing subpoena, declaration of records custodian, attachment a and declaration of service; emailed same to counsel for all parties [1]	1	\$ 150.00	\$ 150.00
8/12/2022	HMR	Worked on and finalized reply in support of motion to clarify order, declaration of service, response to motion for protective order, declaration of Blythe H. Chandler, exhibits 1-2, proposed order and declaration of service; electronically filed same; submitted judges working copies of same [2]	2	\$ 150.00	\$ 300.00

Date	Initials	Narrative	Units	Rate	Value
8/16/2022	HMR	Worked on and finalized supplemental response in support of motion to clarify, declaration of service and attachment 1; electronically filed same; submitted judges working copies [.6] coordinated service of subpoena on American express [.3] worked on and finalized notice of appearance for Eden B. Nordby and declaration of service; electronically filed same [.4]	1.3	\$ 150.00	\$ 195.00
9/2/2022	HMR	Worked on and finalized special verdict form, proposed jury instructions, plaintiff's notice of ER 904 designations and declaration of service; electronically filed same [.5]	0.5	\$ 150.00	\$ 75.00
9/12/2022	HMR	Worked on and finalized plaintiff's witness list and plaintiff's exhibit list and declaration of service; electronically filed same [.5]	0.5	\$ 150.00	\$ 75.00
9/15/2022	HMR	Worked on and finalized response to defendant's motion to bifurcate, declaration of Blythe H. Chandler, exhibit 1, proposed order index of non-Washington authorities cited in same, declaration of service, joint confirmation of trial readiness and declaration of service; electronically filed same; submitted judges working copies of same [1.5]	1.5	\$ 150.00	\$ 225.00
9/19/2022	HMR	Worked on and finalized CR 43F notice to appear at trial directed to Erik Gantz and Kevin Tussy and declaration of service; emailed same to counsel for all parties [.5]	0.5	\$ 150.00	\$ 75.00
9/20/2022	HMR	Worked on and finalized plaintiff's motions in limine, declaration of Blythe H. Chandler, exhibits 1-3, proposed order, declaration of service; electronically filed same; submitted judges' working copies of same [1]; worked on and finalized response to motion for protective order, declaration of Blythe H. Chandler, exhibits 1-2, proposed order, declaration of service; electronically filed same; submitted judges working copies of same [1]	2	\$ 150.00	\$ 300.00
9/21/2022	HMR	Worked on and finalized motion to compel American express, proposed order, note for motion, declaration of Paul Arons, exhibits 1-6, declaration of service; electronically filed same; submitted judges' working copies; coordinated service of same with Seattle Legal Messengers [1]	1	\$ 150.00	\$ 150.00

Date	Initials	Narrative	Units	Rate	Value
9/23/2022	HMR	Worked on and finalized response to motion to strike experts, proposed order, praecipe to replace, exhibits 1-18, declaration of Beth E. Terrell, declaration of Blythe H. Chandler, declaration of mailing; electronically filed same; submitted judges working copies [1.5]	1.5	\$ 150.00	\$ 225.00
9/26/2022	HMR	Worked on and finalized plaintiff's trial brief, special verdict form, statement of the case, proposed neutral statement of the case, proposed just instructions with citations and without, agreed proposed jury instructions with citations and without, exs 1-7, proposed findings of fact and conclusions of law, plaintiff's designations of discovery answers, resp and admissions, joint statement of evidence and declaration of service [3]	3	\$ 150.00	\$ 450.00
9/27/2022	HMR	Worked on and finalized response to Gantz motions in limine and response to Tussy's motions in limine and declaration of service; electronically filed same [1]	1	\$ 150.00	\$ 150.00
9/29/2022	HMR	Worked on and finalized fully executed settlement agreement [.5]; worked on and finalized stipulated motion to continue trial date, proposed order and declaration of service; electronically filed same [.5]	1	\$ 150.00	\$ 150.00
			<b>60</b>		<b>\$ 9,000.00</b>
7/11/2022	JS	Read the case complaint [0.5].	0.5	\$ 200.00	\$ 100.00
7/12/2022	JS	Analyzed case strategy [0.5]; worked on document review [4.1].	4.6	\$ 200.00	\$ 920.00
7/27/2022	JS	Worked on document review [6.9].	6.9	\$ 200.00	\$ 1,380.00
7/28/2022	JS	Worked on document review [1.3].	1.3	\$ 200.00	\$ 260.00
7/29/2022	JS	Worked on document review [4.1].	4.1	\$ 200.00	\$ 820.00
8/2/2022	JS	Worked on document review [5.5].	5.5	\$ 200.00	\$ 1,100.00
8/3/2022	JS	Worked on document review [6.0].	6	\$ 200.00	\$ 1,200.00
8/8/2022	JS	Worked on document review [1.5].	1.5	\$ 200.00	\$ 300.00
8/9/2022	JS	Worked on document review [0.3].	0.3	\$ 200.00	\$ 60.00
8/17/2022	JS	Worked on document review [4.8].	4.8	\$ 200.00	\$ 960.00
8/18/2022	JS	Worked on document review [8.0].	8	\$ 200.00	\$ 1,600.00
8/19/2022	JS	Worked on document review [8.0].	8	\$ 200.00	\$ 1,600.00
8/22/2022	JS	Worked on document review [7.6].	7.6	\$ 200.00	\$ 1,520.00

Date	Initials	Narrative	Units	Rate	Value
8/23/2022	JS	Worked on document review [6.3].	6.3	\$ 200.00	\$ 1,260.00
8/24/2022	JS	Worked on document review [9.0].	9	\$ 200.00	\$ 1,800.00
8/25/2022	JS	Worked on document review [9.2].	9.2	\$ 200.00	\$ 1,840.00
8/26/2022	JS	Worked on document review [8.0].	8	\$ 200.00	\$ 1,600.00
			<b>91.6</b>		<b>\$ 18,320.00</b>
9/19/2022	JR	Researched and analyzed authorities for motion in limine [4.5].	4.5	\$ 275.00	\$ 1,237.50
9/20/2022	JR	Analyzed authority for motion in limine [2.1].	2.1	\$ 275.00	\$ 577.50
10/4/2022	JR	Drafted settlement notices [7.1]; case conference with BC [.4].	7.5	\$ 275.00	\$ 2,062.50
10/5/2022	JR	Drafted settlement notices [6.7].	6.7	\$ 275.00	\$ 1,842.50
			<b>20.8</b>		<b>\$ 5,720.00</b>
9/21/2020	JJB	Created case document database; processed third party production; reviewed third party production; correspondence regarding same.	2	\$ 195.00	\$ 390.00
9/22/2020	JJB	Telephone conference regarding third party production and document database.	0.2	\$ 195.00	\$ 39.00
4/26/2021	JJB	Entity research.	1.3	\$ 195.00	\$ 253.50
5/11/2021	JJB	Reviewed entity research; telephone conference regarding same.	0.3	\$ 195.00	\$ 58.50
7/26/2021	JJB	Telephone conference regarding third party discovery.	0.2	\$ 195.00	\$ 39.00
7/28/2021	JJB	Prepared for call with opposing counsel and vendor regarding FTC documents; telephone conference with defendant and vendor regarding FTC documents.	0.5	\$ 195.00	\$ 97.50
10/6/2021	JJB	Correspondence regarding production issue.	0.1	\$ 195.00	\$ 19.50
10/26/2021	JJB	Correspondence regarding class notice website.	0.1	\$ 195.00	\$ 19.50
1/13/2022	JJB	Prepared files for class notice mail merge.	0.6	\$ 195.00	\$ 117.00
1/14/2022	JJB	Formatted notice for mass email; correspondence regarding same; managed case email correspondence; sent mass email with class notice.	1.2	\$ 195.00	\$ 234.00
3/8/2022	JJB	Calculated post-judgment interest.	0.2	\$ 195.00	\$ 39.00
3/14/2022	JJB	Conference call regarding trial prep.	0.4	\$ 195.00	\$ 78.00
3/15/2022	JJB	Researched ER 904 requirements; researched video deposition file format requirements for trial software.	1	\$ 195.00	\$ 195.00

Date	Initials	Narrative	Units	Rate	Value
9/19/2022	JJB	Calculated post-judgment interest; personal conference regarding same.	0.2	\$ 195.00	\$ 39.00
9/20/2022	JJB	Processed third party productions; updated production log; sent file to expert; correspondence regarding same.	1	\$ 195.00	\$ 195.00
9/23/2022	JJB	Worked on setting up virtual trial technology.	1.8	\$ 195.00	\$ 351.00
9/27/2022	JJB	Continued setting up virtual courtroom technology.	2.8	\$ 195.00	\$ 546.00
			<b>13.9</b>		<b>\$ 2,710.50</b>
9/7/2022	JM	Finalized disclosures and added attachments, sent to attorney for review.	0.4	\$ 150.00	\$ 60.00
9/8/2022	JM	Communicate with staff on specifics of sending production, send production, saved email to file.	0.5	\$ 150.00	\$ 75.00
9/15/2022	JM	Prepared shell declaration, service declaration, and proposed order, sent to staff and attorney.	1	\$ 150.00	\$ 150.00
9/19/2022	JM	Drafted notice to appear at trial for defendants, submitted to attorney for review, saved in file.	1	\$ 150.00	\$ 150.00
9/20/2022	JM	Created a jury question template, saved to file, communicated status with staff and attorney.	1.2	\$ 150.00	\$ 180.00
9/21/2022	JM	Drafted deposition notice for defendant, sent to attorneys and staff, communicated with attorneys and staff on various issues, communicated with staff on service; served on all parties; updated draft of jury questions, communicated with attorney on specifics, saved to file, finalized, filed as a notice; communicated with staff and attorneys on specifics of deposition notice of another defendant, drafted, sent to attorneys and staff for review; communicated with attorneys and staff on court reporter and videographer for depositions, scheduled videographer for depositions, scheduled court reporter for depositions, communicated this with attorneys and staff.	4	\$ 150.00	\$ 600.00
9/22/2022	JM	Served all parties with deposition notice of defendant, saved service email to file.	0.25	\$ 150.00	\$ 37.50
9/27/2022	JM	Served parties with dep link, sent to docketing, emailed counsel list to court reporter, saved emails to file.	0.5	\$ 150.00	\$ 75.00

Date	Initials	Narrative	Units	Rate	Value
9/28/2022	JM	Communicated with attorneys on scheduled deposition and potential cancelation, communicated with court reporter and videographer on counsel names, communicated with attorney on deposition cancelation, sent cancellation notice to videographer and court reporter, saved emails to file.	0.75	\$ 150.00	\$ 112.50
10/3/2022	JM	Forwarded invoice to account from cancelled deposition transcription services.	0.4	\$ 150.00	\$ 60.00
10/4/2022	JM	Prepped shell motion, declaration, and proposed order, sent to attorney and staff, saved to file.	0.5	\$ 150.00	\$ 75.00
			<b>10.5</b>		<b>\$ 1,575.00</b>
9/19/2022	JRM	Worked on motion in limine[0.5]; continued to work on same[3.3].	3.8	\$ 550.00	\$ 2,090.00
9/20/2022	JRM	Worked on motions in limine[2.0]; continued to work on same[3.5].	5.5	\$ 550.00	\$ 3,025.00
9/26/2022	JRM	Worked on jury instructions[.2]; worked on findings of fact[0.3]; reviewed finals[0.2].	0.7	\$ 550.00	\$ 385.00
			<b>10</b>		<b>\$ 5,500.00</b>
5/29/2020	JAL	Worked on docketing [0.2].	0.2	\$ 150.00	\$ 30.00
6/17/2020	JAL	Worked on drafting subpoena [3.2]; worked on docketing [0.1].	3.3	\$ 150.00	\$ 495.00
6/18/2020	JAL	Worked on drafting subpoenas [2.7].	2.7	\$ 150.00	\$ 405.00
6/19/2020	JAL	Worked on preparing subpoenas for service [0.6].	0.6	\$ 150.00	\$ 90.00
6/24/2020	JAL	Worked on subpoenas [0.2].	0.2	\$ 150.00	\$ 30.00
6/29/2020	JAL	Worked on updating address for service [1.2].	1.2	\$ 150.00	\$ 180.00
7/1/2020	JAL	Worked on docketing [1.1].	1.1	\$ 150.00	\$ 165.00
7/2/2020	JAL	Worked on updating subpoena tracking spreadsheet [0.2].	0.2	\$ 150.00	\$ 30.00
7/14/2020	JAL	Worked on preparing discovery requests for service and resulting correspondence [1.8]	1.8	\$ 150.00	\$ 270.00
7/15/2020	JAL	Worked on docketing [0.1]; worked on updating subpoena tracking chart [0.2]; worked on bates-labeling subpoena response [0.6].	0.9	\$ 150.00	\$ 135.00
7/16/2020	JAL	Worked on updating subpoena tracking chart [0.2]; worked on redacting subpoena response [0.7].	0.9	\$ 150.00	\$ 135.00



Date	Initials	Narrative	Units	Rate	Value
7/17/2020	JAL	Worked on updating subpoena tracking chart [0.2]; worked on transmitting documents via sharefile [0.2]; worked on docketing [0.1].	0.5	\$ 150.00	\$ 75.00
7/20/2020	JAL	Worked on updating subpoena tracking chart [0.6]; contacted American Express regarding subpoena response [0.1].	0.7	\$ 150.00	\$ 105.00
7/21/2020	JAL	Worked on updating subpoena tracking log [0.1]; worked on updating production log [0.1]; worked on transmitting documents via sharefile [0.1]; worked on bates-labeling subpoena response [0.3].	0.6	\$ 150.00	\$ 90.00
7/22/2020	JAL	Worked on updating subpoena tracking chart [0.1].	0.1	\$ 150.00	\$ 15.00
7/24/2020	JAL	Worked on updating subpoena tracking chart [0.1].	0.1	\$ 150.00	\$ 15.00
7/27/2020	JAL	Worked on bates-labeling and redacting subpoena response [1.9]; worked on transmitting documents via sharefile [0.2].	2.1	\$ 150.00	\$ 315.00
7/28/2020	JAL	Worked on processing subpoena response [0.5].	0.5	\$ 150.00	\$ 75.00
8/4/2020	JAL	Worked on processing subpoena response [0.7].	0.7	\$ 150.00	\$ 105.00
8/5/2020	JAL	Worked on processing subpoena response [0.9].	0.9	\$ 150.00	\$ 135.00
8/11/2020	JAL	Attended check-in meeting [0.5]; worked on updating subpoena tracking spreadsheet [0.1].	0.6	\$ 150.00	\$ 90.00
8/13/2020	JAL	Worked on drafting subpoenas [0.6].	0.6	\$ 150.00	\$ 90.00
8/19/2020	JAL	Called AMEX regarding subpoena response [0.1]; worked on downloading video and webpages from site [0.2].	0.3	\$ 150.00	\$ 45.00
8/20/2020	JAL	Prepared email to facilitate receipt of subpoenas response [0.3].	0.3	\$ 150.00	\$ 45.00
8/21/2020	JAL	Worked on updating production log [0.2].	0.2	\$ 150.00	\$ 30.00
9/3/2020	JAL	Worked on redacting subpoena response [0.2].	0.2	\$ 150.00	\$ 30.00
9/4/2020	JAL	Worked on drafting subpoenas [2.0]; worked on docketing [0.1].	2.1	\$ 150.00	\$ 315.00
9/11/2020	JAL	Worked on preparing subpoenas for service [0.5].	0.5	\$ 150.00	\$ 75.00
9/14/2020	JAL	Worked on researching address for service subpoena [0.2].	0.2	\$ 150.00	\$ 30.00
9/16/2020	JAL	Worked on updating subpoena tracking chart [0.2].	0.2	\$ 150.00	\$ 30.00
9/17/2020	JAL	Worked on sharing secure link to upload responsive documents [0.2].	0.2	\$ 150.00	\$ 30.00
9/18/2020	JAL	Worked on downloading subpoena response and updating subpoena tracking log [0.5]; worked on responding to call regarding subpoena [0.2].	0.7	\$ 150.00	\$ 105.00
9/21/2020	JAL	Worked on transmitting documents via sharefile [0.4].	0.4	\$ 150.00	\$ 60.00

Date	Initials	Narrative	Units	Rate	Value
9/22/2020	JAL	Worked on conversation and processing third-party production [0.8].	0.8	\$ 150.00	\$ 120.00
9/24/2020	JAL	Worked on updating address for service of subpoena [0.2].	0.2	\$ 150.00	\$ 30.00
9/28/2020	JAL	Worked on processing subpoena response [0.2].	0.2	\$ 150.00	\$ 30.00
10/2/2020	JAL	Worked on processing subpoena response [0.5].	0.5	\$ 150.00	\$ 75.00
10/20/2020	JAL	Worked on asset investigation [2.1].	2.1	\$ 150.00	\$ 315.00
12/22/2020	JAL	Worked on document review [1.9].	1.9	\$ 150.00	\$ 285.00
1/6/2021	JAL	Worked on document review [2.3].	2.3	\$ 150.00	\$ 345.00
1/12/2021	JAL	Worked on drafting subpoenas [1.7].	1.7	\$ 150.00	\$ 255.00
1/13/2021	JAL	Worked on drafting subpoenas [0.9].	0.9	\$ 150.00	\$ 135.00
1/15/2021	JAL	Worked on drafting notices of subpoena [1.9].	1.9	\$ 150.00	\$ 285.00
1/25/2021	JAL	Worked on drafting subpoenas [0.3].	0.3	\$ 150.00	\$ 45.00
1/26/2021	JAL	Worked on compiling subpoena packages [3.1].	3.1	\$ 150.00	\$ 465.00
1/27/2021	JAL	Worked on subpoena tracking [1.1].	1.1	\$ 150.00	\$ 165.00
1/28/2021	JAL	Worked on updating subpoena address [1.1]; worked on updating subpoena tracking chart [0.4].	1.5	\$ 150.00	\$ 225.00
1/29/2021	JAL	Worked on subpoena tracking [1.1].	1.1	\$ 150.00	\$ 165.00
2/1/2021	JAL	Worked on subpoena tracking [1.3].	1.3	\$ 150.00	\$ 195.00
2/8/2021	JAL	Worked on updating subpoena tracking chart [0.4].	0.4	\$ 150.00	\$ 60.00
2/9/2021	JAL	Worked on updating subpoena tracking log [0.6].	0.6	\$ 150.00	\$ 90.00
2/10/2021	JAL	Worked on loading productions into lpro [2.5].	2.5	\$ 150.00	\$ 375.00
2/11/2021	JAL	Worked on updating subpoena tracking log [0.2]; worked on loading production and updating production log [0.5].	0.7	\$ 150.00	\$ 105.00
2/12/2021	JAL	Worked on loading production [0.3].	0.3	\$ 150.00	\$ 45.00
2/16/2021	JAL	Worked on loading production [0.2]; worked on updating subpoena tracking and production logs [0.2].	0.4	\$ 150.00	\$ 60.00
3/1/2021	JAL	Worked on composing email [0.4].	0.4	\$ 150.00	\$ 60.00
3/15/2021	JAL	Worked on finalizing and emailing discovery requests [0.8].	0.8	\$ 150.00	\$ 120.00
4/29/2021	JAL	Worked on attaching face pages to exhibits [0.2].	0.2	\$ 150.00	\$ 30.00
5/12/2021	JAL	Worked on drafting subpoena [1.8].	1.8	\$ 150.00	\$ 270.00
5/25/2021	JAL	Worked on uploading documents to lpro [3.1].	3.1	\$ 150.00	\$ 465.00
7/14/2021	JAL	Worked on loading documents into lpro [1.4].	1.4	\$ 150.00	\$ 210.00
7/15/2021	JAL	Worked on loading production into lpro and updating production log [2.1].	2.1	\$ 150.00	\$ 315.00

Date	Initials	Narrative	Units	Rate	Value
7/21/2021	JAL	Worked on loading production [0.6].	0.6	\$ 150.00	\$ 90.00
7/23/2021	JAL	Worked on tracking subpoena responses [0.5].	0.5	\$ 150.00	\$ 75.00
7/26/2021	JAL	Worked on loading production into lpro [0.5].	0.5	\$ 150.00	\$ 75.00
8/4/2021	JAL	Worked on setting up sharefile link and uploading documents [2.9].	2.9	\$ 150.00	\$ 435.00
8/5/2021	JAL	Worked on processing subpoena response [2.3].	2.3	\$ 150.00	\$ 345.00
8/6/2021	JAL	Worked on emailing documents for service [0.6].	0.6	\$ 150.00	\$ 90.00
8/10/2021	JAL	Worked on downloading and saving video [0.2].	0.2	\$ 150.00	\$ 30.00
8/13/2021	JAL	Worked on loading production and updating production log [0.5]; worked on reviewing declaration draft [0.3].	0.8	\$ 150.00	\$ 120.00
8/16/2021	JAL	Worked on loading production in lpro [1.6].	1.6	\$ 150.00	\$ 240.00
8/17/2021	JAL	Worked on loading production into lpro [2.3].	2.3	\$ 150.00	\$ 345.00
8/23/2021	JAL	Worked on tag palette [0.6].	0.6	\$ 150.00	\$ 90.00
8/24/2021	JAL	Worked on preparing for class member emails [1.4].	1.4	\$ 150.00	\$ 210.00
8/25/2021	JAL	Worked on drafting sending emails to potential class members [1.6].	1.6	\$ 150.00	\$ 240.00
8/26/2021	JAL	Worked on modifying lpro tag palette [0.6].	0.6	\$ 150.00	\$ 90.00
8/27/2021	JAL	Worked on organizing lpro tag palette [0.4].	0.4	\$ 150.00	\$ 60.00
8/31/2021	JAL	Worked on class member declaration emails [0.9].	0.9	\$ 150.00	\$ 135.00
9/1/2021	JAL	Worked on sending emails to potential class members [0.2].	0.2	\$ 150.00	\$ 30.00
9/2/2021	JAL	Worked on class member declaration emails [0.5]; worked on preparing for class member declaration call [0.8].	1.3	\$ 150.00	\$ 195.00
9/3/2021	JAL	Worked on sending discovery requests [0.4]; worked on class member calls [0.8]; worked on drafting call script [2.1].	3.3	\$ 150.00	\$ 495.00
9/7/2021	JAL	Worked on class member call [1.3].	1.3	\$ 150.00	\$ 195.00
9/8/2021	JAL	Worked on class member communication [0.2].	0.2	\$ 150.00	\$ 30.00
9/9/2021	JAL	Worked on check-in regarding class member declaration emails [0.2].	0.2	\$ 150.00	\$ 30.00
9/10/2021	JAL	Worked on sending mailing label [0.6].	0.6	\$ 150.00	\$ 90.00
9/17/2021	JAL	Worked on document review [3.0].	3	\$ 150.00	\$ 450.00
9/20/2021	JAL	Worked on gathering exhibits [1.4].	1.4	\$ 150.00	\$ 210.00
9/22/2021	JAL	Worked on pulling exhibits and drafting declaration [6.1].	6.1	\$ 150.00	\$ 915.00
9/23/2021	JAL	Worked on drafting declaration and pulling exhibits [4.2]; worked on sending sharefile links [0.6].	4.8	\$ 150.00	\$ 720.00

Date	Initials	Narrative	Units	Rate	Value
9/28/2021	JAL	Worked on scanning documents [2.2]; worked on tag organization in Ipro [0.4].	2.6	\$ 150.00	\$ 390.00
9/29/2021	JAL	Worked on tagging documents in Ipro [0.5].	0.5	\$ 150.00	\$ 75.00
9/30/2021	JAL	Worked on preparing sharefile link [0.9].	0.9	\$ 150.00	\$ 135.00
10/1/2021	JAL	Worked on gathering deposition exhibits [0.6].	0.6	\$ 150.00	\$ 90.00
10/3/2021	JAL	Worked on compiling deposition exhibits [2.1].	2.1	\$ 150.00	\$ 315.00
10/4/2021	JAL	Worked on preparing deposition exhibits [0.9]; worked on redacting and excerpting exhibits [1.5]; worked on sending redacted exhibits with Sharefile [0.2]; worked on preparing exhibits [0.6].	3.2	\$ 150.00	\$ 480.00
10/5/2021	JAL	Worked on address search [1.9].	1.9	\$ 150.00	\$ 285.00
10/6/2021	JAL	Worked on accessing production issues [0.6].	0.6	\$ 150.00	\$ 90.00
10/8/2021	JAL	Worked on saving documents to cases folder [0.2].	0.2	\$ 150.00	\$ 30.00
10/11/2021	JAL	Worked on sending documents with ShareFile [3.4].	3.4	\$ 150.00	\$ 510.00
10/12/2021	JAL	Worked on reviewing zipped sharefile link [0.6].	0.6	\$ 150.00	\$ 90.00
10/19/2021	JAL	Worked on drafting class notice [2.4].	2.4	\$ 150.00	\$ 360.00
10/21/2021	JAL	Worked on drafting class notice [4.4].	4.4	\$ 150.00	\$ 660.00
10/25/2021	JAL	Worked on drafting class notice [3.1].	3.1	\$ 150.00	\$ 465.00
10/26/2021	JAL	Worked on class notice plan [0.4].	0.4	\$ 150.00	\$ 60.00
11/5/2021	JAL	Worked on processing production [0.8].	0.8	\$ 150.00	\$ 120.00
11/9/2021	JAL	Worked on class notice preparation [0.3].	0.3	\$ 150.00	\$ 45.00
11/12/2021	JAL	Worked on class notice cost spreadsheet [2.1].	2.1	\$ 150.00	\$ 315.00
11/15/2021	JAL	Worked on notice cost estimate spreadsheet [2.1].	2.1	\$ 150.00	\$ 315.00
11/16/2021	JAL	Worked on coordinating meeting for notice website [0.3].	0.3	\$ 150.00	\$ 45.00
11/17/2021	JAL	Attended meeting on class notice website [0.5].	0.5	\$ 150.00	\$ 75.00
12/3/2021	JAL	Worked on processing production and updating production log [1.2].	1.2	\$ 150.00	\$ 180.00
12/21/2021	JAL	Worked on preparing exhibits [0.3].	0.3	\$ 150.00	\$ 45.00
12/23/2021	JAL	Worked on excerpting deposition transcripts [0.7].	0.7	\$ 150.00	\$ 105.00
12/27/2021	JAL	Worked on preparing exhibits [1.6]; worked on drafting declaration [2.5]; worked on finalizing exhibits and brief [2.1].	6.2	\$ 150.00	\$ 930.00
1/6/2022	JAL	Worked on class notice [1.3].	1.3	\$ 150.00	\$ 195.00
1/10/2022	JAL	Worked on class notice [0.6].	0.6	\$ 150.00	\$ 90.00

Date	Initials	Narrative	Units	Rate	Value
1/11/2022	JAL	Worked on organizing class member declaration call spreadsheet and email template [0.8]; worked on filling in class notice blanks and reformatting [1.1]; worked on finding class member notice cardstock [1.9].	3.8	\$ 150.00	\$ 570.00
1/12/2022	JAL	Worked on purchasing and picking up cardstock paper for class notice [0.8]; worked on responding to email regarding website [0.6]; worked on formatting notice [1.1]; worked on address search [5.3].	7.8	\$ 150.00	\$ 1,170.00
1/13/2022	JAL	Worked on address searches [2.4]; worked on printer settings for notice [3.1]; worked on email notice [0.3]; worked on printing notices [2.3].	8.1	\$ 150.00	\$ 1,215.00
1/14/2022	JAL	Worked on preparing class notices for mailing [2.6]; worked on preparation for emailing notices [0.1].	2.7	\$ 150.00	\$ 405.00
1/18/2022	JAL	Worked on class notice administration [0.7].	0.7	\$ 150.00	\$ 105.00
1/21/2022	JAL	Worked on class notice spreadsheet [0.4].	0.4	\$ 150.00	\$ 60.00
1/24/2022	JAL	Worked on class notice tracking spreadsheet [0.6].	0.6	\$ 150.00	\$ 90.00
1/25/2022	JAL	Worked on class member calls [0.3]; worked on class member call tracking spreadsheet [0.2].	0.5	\$ 150.00	\$ 75.00
1/27/2022	JAL	Worked on class notice spreadsheet [1.3].	1.3	\$ 150.00	\$ 195.00
1/31/2022	JAL	Worked on declaration formatting [0.4]; worked on responding to class member calls [0.3].	0.7	\$ 150.00	\$ 105.00
2/1/2022	JAL	Worked on sending declaration for signature [0.4].	0.4	\$ 150.00	\$ 60.00
2/2/2022	JAL	Worked on sending declaration for signature [1.4]; worked on address search [0.5].	1.9	\$ 150.00	\$ 285.00
2/3/2022	JAL	Worked on class member calls [0.2]; worked on sending declaration for signature [0.6]; worked on compiling declarations [0.4].	1.2	\$ 150.00	\$ 180.00
2/4/2022	JAL	Worked on responding to class member calls [0.3]; worked on address search [1.5]	1.8	\$ 150.00	\$ 270.00
2/8/2022	JAL	Worked on address searches [1.5]; worked on printing returned notices [2.2].	3.7	\$ 150.00	\$ 555.00
2/10/2022	JAL	Worked on updating tracking spreadsheet [0.2].	0.2	\$ 150.00	\$ 30.00
2/14/2022	JAL	Worked on responding to class calls [0.2].	0.2	\$ 150.00	\$ 30.00
2/16/2022	JAL	Worked on responding to class member calls [0.6].	0.6	\$ 150.00	\$ 90.00

Date	Initials	Narrative	Units	Rate	Value
2/17/2022	JAL	Worked on processing return postcards [0.2].	0.2	\$ 150.00	\$ 30.00
2/18/2022	JAL	Worked on processing return postcards [0.7].	0.7	\$ 150.00	\$ 105.00
2/22/2022	JAL	Worked on processing return postcards [0.2].	0.2	\$ 150.00	\$ 30.00
2/23/2022	JAL	Worked on class member calls [0.3].	0.3	\$ 150.00	\$ 45.00
3/7/2022	JAL	Worked on loading production and updating log [1.5].	1.5	\$ 150.00	\$ 225.00
3/8/2022	JAL	Worked on determining number of exclusion requests [0.6].	0.6	\$ 150.00	\$ 90.00
3/9/2022	JAL	Worked on loading production and updating production log [4.1].	4.1	\$ 150.00	\$ 615.00
3/11/2022	JAL	Worked on gathering ER 904 documents [0.6]; attended meeting on trial preparation [0.9].	1.5	\$ 150.00	\$ 225.00
3/14/2022	JAL	Worked on gathering ER 904 documents [4.8]; attended trial preparation meeting [0.5].	5.3	\$ 150.00	\$ 795.00
3/15/2022	JAL	Worked on gathering ER 904 documents [8.4].	8.4	\$ 150.00	\$ 1,260.00
3/16/2022	JAL	Worked on gathering ER 904 documents [6.1].	6.1	\$ 150.00	\$ 915.00
3/17/2022	JAL	Worked on gathering ER 904 documents [1.6].	1.6	\$ 150.00	\$ 240.00
4/6/2022	JAL	Worked on loading production [0.4].	0.4	\$ 150.00	\$ 60.00
4/19/2022	JAL	Worked on document review [2.1].	2.1	\$ 150.00	\$ 315.00
5/17/2022	JAL	Worked on responding to class member call [0.2].	0.2	\$ 150.00	\$ 30.00
5/27/2022	JAL	Worked on loading and logging productions [0.7]; worked on document search [0.3].	1	\$ 150.00	\$ 150.00
6/3/2022	JAL	Worked on class member tracking spreadsheet [0.2].	0.2	\$ 150.00	\$ 30.00
6/6/2022	JAL	Worked on loading production and updating production log [0.5].	0.5	\$ 150.00	\$ 75.00
6/17/2022	JAL	Worked on loading production [0.6].	0.6	\$ 150.00	\$ 90.00
6/28/2022	JAL	Worked on reviewing production loads in Ipro [0.8].	0.8	\$ 150.00	\$ 120.00
6/30/2022	JAL	Worked on class member document searches [4.2].	4.2	\$ 150.00	\$ 630.00
7/1/2022	JAL	Worked on class member document searches [1.1]; worked on setting up sharefile links [0.3]; worked on creating folder for documents on Q-Drive [0.7].	2.1	\$ 150.00	\$ 315.00
7/6/2022	JAL	Worked on creating sharefile upload links [0.8].	0.8	\$ 150.00	\$ 120.00
7/7/2022	JAL	Worked on saving witness documents [0.2].	0.2	\$ 150.00	\$ 30.00
7/11/2022	JAL	Worked on saving class member documents [0.5].	0.5	\$ 150.00	\$ 75.00
7/13/2022	JAL	Worked on class member document search [0.8]; worked on loading production and updating production log [0.2]; worked on converting screenshots to pdfs [0.2].	1.2	\$ 150.00	\$ 180.00
7/15/2022	JAL	Worked on communication regarding production [0.2].	0.2	\$ 150.00	\$ 30.00

Date	Initials	Narrative	Units	Rate	Value
7/27/2022	JAL	Worked on document analysis [0.5]; worked on processing production and updating production log [0.3].	0.8	\$ 150.00	\$ 120.00
7/28/2022	JAL	Worked on locating and saving documents [0.5].	0.5	\$ 150.00	\$ 75.00
7/29/2022	JAL	Worked on processing production [2.2].	2.2	\$ 150.00	\$ 330.00
8/1/2022	JAL	Worked on preparing documents for production [5.7].	5.7	\$ 150.00	\$ 855.00
8/2/2022	JAL	Worked on preparing documents for production [4.8].	4.8	\$ 150.00	\$ 720.00
8/10/2022	JAL	Worked on gathering documents to send to client [0.9].	0.9	\$ 150.00	\$ 135.00
8/11/2022	JAL	Worked on preparing documents for mailing [0.7].	0.7	\$ 150.00	\$ 105.00
8/12/2022	JAL	Worked on pulling documents for review [0.5].	0.5	\$ 150.00	\$ 75.00
8/15/2022	JAL	Worked on creating PDF version of production [0.1].	0.1	\$ 150.00	\$ 15.00
8/16/2022	JAL	Worked on drafting exhibit for filing [0.4]; worked on creating and transmitting PDFs of production [0.8].	1.2	\$ 150.00	\$ 180.00
8/19/2022	JAL	Worked on bates labeling documents [2.2].	2.2	\$ 150.00	\$ 330.00
8/23/2022	JAL	Worked on processing client documents [0.7].	0.7	\$ 150.00	\$ 105.00
8/25/2022	JAL	Worked on downloading and transmitting deposition transcripts [0.9].	0.9	\$ 150.00	\$ 135.00
8/29/2022	JAL	Worked on document review and attended meeting [4.9].	4.9	\$ 150.00	\$ 735.00
8/30/2022	JAL	Worked on tagging documents in Ipro [0.6]; worked on responding to emails regarding project [0.8].	1.4	\$ 150.00	\$ 210.00
8/31/2022	JAL	Worked on spreadsheet compiling contact info [0.2]; worked on document review for ER 904 [5.9]; worked on ER 904 spreadsheet [1.1].	7.2	\$ 150.00	\$ 1,080.00
9/2/2022	JAL	Worked on ER 904 designation table [4.4]; worked on labeling exhibits [4.0]; worked on compiling exhibits [0.3].	8.7	\$ 150.00	\$ 1,305.00
9/6/2022	JAL	Worked on coordinating document review project [0.3]; worked on resending sharefile link [0.4]; .	0.7	\$ 150.00	\$ 105.00
9/7/2022	JAL	Worked on loading production [0.7]; worked on document review [1.2]; worked on creating spreadsheets from ER 904 designations [4.1].	6	\$ 150.00	\$ 900.00
9/8/2022	JAL	Worked on creating spreadsheets from ER 904 designations [2.9].	2.9	\$ 150.00	\$ 435.00
9/9/2022	JAL	Worked on creating exhibits [4.0]; attended meeting [0.9].	4.9	\$ 150.00	\$ 735.00
9/12/2022	JAL	Worked on preparing documents for combining [1.5]; worked on combining document [0.2]; worked on compiling exhibits [4.1]; worked on compiling and sending sharefile link [0.5].	6.3	\$ 150.00	\$ 945.00

Date	Initials	Narrative	Units	Rate	Value
9/13/2022	JAL	Worked on loading production and updating production log [0.4]; worked on downloading and saving exhibits [0.3].	0.7	\$ 150.00	\$ 105.00
9/14/2022	JAL	Worked on spreadsheet for ER 904 objections [0.8].	0.8	\$ 150.00	\$ 120.00
9/15/2022	JAL	Worked on creating spreadsheets from ER 904 lists [2.2].	2.2	\$ 150.00	\$ 330.00
9/16/2022	JAL	Worked on coordinating print job [0.6]; worked on designation spreadsheet [0.5]; worked on drafting subpoena [0.2]; worked on scheduling deposition [0.4].	1.7	\$ 150.00	\$ 255.00
9/19/2022	JAL	Worked on setting up sharefile account [0.2]; worked on processing production [1.0]; worked on sending production to expert [0.6].	1.8	\$ 150.00	\$ 270.00
9/20/2022	JAL	Attended meeting regarding joint statement of evidence [0.2]; worked on joint statement of evidence spreadsheet [6.1].	6.3	\$ 150.00	\$ 945.00
9/21/2022	JAL	Worked on joint statement of evidence spreadsheet [2.0].	2	\$ 150.00	\$ 300.00
9/22/2022	JAL	Worked on updating the joint statement of evidence spreadsheet [2.2].	2.2	\$ 150.00	\$ 330.00
9/23/2022	JAL	Worked on discovery designations [2.2].	2.2	\$ 150.00	\$ 330.00
9/26/2022	JAL	Worked on reviewing exhibit to joint statement of evidence [1.7].	1.7	\$ 150.00	\$ 255.00
			<b>312.8</b>		<b>\$ 46,920.00</b>
7/16/2020	JN	Reviewed email regarding additional items to be redacted in third party subpoena responses and reviewed same to prepare response.[.2]	0.2	\$ 195.00	\$ 39.00
8/10/2020	JN	Reviewed email enclosing link to production documents and retrieved same from Dropbox.[.1]; Updated production log.[.1]	0.2	\$ 195.00	\$ 39.00
7/14/2021	JN	Reviewed email to counsel enclosing discovery requests to Mr. Gantz.[.1]; Reviewed email invitation and correspondence regarding QuickBooks account and created same.[.2]; Reviewed documents pertaining to compelled documents.[.2]	0.1	\$ 195.00	\$ 19.50
7/15/2022	JN	Worked on strategy for priority items to review in preparation for QuickBooks data export.[.4]	0.4	\$ 195.00	\$ 78.00
7/15/2022	JN	Continued review of data and prepared email enclosing summary of same.[.7]	0.4	\$ 195.00	\$ 78.00
7/18/2022	JN		0.7	\$ 195.00	\$ 136.50



Date	Initials	Narrative	Units	Rate	Value
7/18/2022	JN	Worked on issues regarding further analysis of data.[.2]	0.3	\$ 195.00	\$ 58.50
7/18/2022	JN	Worked on issues regarding QuickBooks exports and analysis of same.[]	0.3	\$ 195.00	\$ 58.50
7/18/2022	JN	Prepared profit and loss statements and balance sheets and analyzed same against those previously produced.	0.9	\$ 195.00	\$ 175.50
7/27/2022	JN	Prepared outline for call with Ms. Driscoll.[.1] Telephone conference with Ms. Driscoll's office regarding potential engagement as an expert witness.[.2]; Prepared emails regarding same.[.1]	0.4	\$ 195.00	\$ 78.00
7/29/2022	JN	Telephone conference with Ms. Saunders regarding QuickBooks project and prepared emails regarding same.[.2]; Telephone conference with Ms. Saunders regarding case introduction and scope of engagement.[.7]	0.9	\$ 195.00	\$ 175.50
8/1/2022	JN	Prepared email to Ms. Saunders enclosing requested materials.[.3]	0.3	\$ 195.00	\$ 58.50
8/4/2022	JN	Telephone conference with Ms. Saunders regarding next steps for analysis of QuickBooks data.[.2]; Prepared emails regarding same.[.1]	0.3	\$ 195.00	\$ 58.50
8/4/2022	JN	Further QuickBooks data analysis.	2.9	\$ 195.00	\$ 565.50
8/10/2022	JN	Worked on installation of QuickBooks and processing of production.[.4]	1.2	\$ 195.00	\$ 234.00
8/10/2022	JN	Worked on export of reports from QuickBooks.[1.2]	1.2	\$ 195.00	\$ 234.00
8/11/2022	JN	Video conference with Ms. Saunders and Mr. _ regarding analysis of QuickBooks data.[1.2]; Worked on document aggregation.[.3]; Call regarding additional data points for analysis.[.2]	1.7	\$ 195.00	\$ 331.50
8/11/2022	JN	Docs	4.1	\$ 195.00	\$ 799.50
8/22/2022	JN	Worked on issues regarding expert data analysis and plans for discussion regarding same.[.1]	0.1	\$ 195.00	\$ 19.50
8/23/2022	JN	Reviewed recent correspondence and prepared outline for call with Mr. Thatcher.[.3]; Telephone conference with Mr. Thatcher regarding task list and anticipated date for receipt of deliverables.[.2]; Prepared email regarding status of expert analysis and plans for discussion of findings.[.1]	0.6	\$ 195.00	\$ 117.00
8/26/2022	JN	Worked on issues regarding expert witness analysis recap.[.1]	0.1	\$ 195.00	\$ 19.50

Date	Initials	Narrative	Units	Rate	Value
8/29/2022	JN	Trial team call	0.8	\$ 195.00	\$ 156.00
8/29/2022	JN	Worked on identification of potential exhibits and tagging of same.[1.6]	1.6	\$ 195.00	\$ 312.00
8/30/2022	JN	Worked on issues regarding preparation of ER 904 disclosures.[.3]	0.3	\$ 195.00	\$ 58.50
8/31/2022	JN	Worked on document and data file review.[2.3];	2.3	\$ 195.00	\$ 448.50
8/31/2022	JN	Worked on expert matters.	0.3	\$ 195.00	\$ 58.50
8/31/2022	JN	Call with Mr. Thatcher and Ms. Saunders regarding analysis of QuickBooks data.[1.1]	1.1	\$ 195.00	\$ 214.50
9/1/2022	JN	Worked on ER 904 designations and review of documents for same.[2.8]	2.8	\$ 195.00	\$ 546.00
9/2/2022	JN	Worked on ER 904 designations	0.4	\$ 195.00	\$ 78.00
		Reviewed Mr. Thatcher's summary of concerns and conducted search of database for requested documents.[.6]; Worked on issues regarding ER 904 exhibits.[.2]; f Worked on issues regarding follow-up analysis and search for documents.[.5]			
9/6/2022	JN		1.3	\$ 195.00	\$ 253.50
9/6/2022	JN	Continued working on doc/data review.[4.4]	4.4	\$ 195.00	\$ 858.00
9/7/2022	JN	Worked on issues regarding QB comparison.[.2]; Reviewed draft email regarding discovery deficiencies.[.1]	0.3	\$ 195.00	\$ 58.50
9/7/2022	JN	Investigation of Mark Blanton and known associates/business entities and tagged documents pertaining to his role in Seed companies.[1.8]	1.8	\$ 195.00	\$ 351.00
9/7/2022	JN	Worked on data analysis and document review.	2.1	\$ 195.00	\$ 409.50
9/8/2022	JN	Worked on issues regarding trial preparations.[.2]	0.2	\$ 195.00	\$ 39.00
9/8/2022	JN	Doc review and arrangement[1.8]	1.8	\$ 195.00	\$ 351.00
9/8/2022	JN	Worked on doc review and exhibit assembly.[4.6]	4.6	\$ 195.00	\$ 897.00
9/9/2022	JN	Worked on exhibits and exhibit list.[7.6]	7.6	\$ 195.00	\$ 1,482.00
9/12/2022	JN	Worked on issues regarding Seed trial exhibits.[.1]	0.1	\$ 195.00	\$ 19.50
9/14/2022	JN	Reviewed emails regarding status of productions and continuance of trial.[.1]	0.1	\$ 195.00	\$ 19.50
9/14/2022	JN	Worked on issues regarding pretrial filings and review of documents/tasks to complete for same.[2.5]	2.5	\$ 195.00	\$ 487.50

Date	Initials	Narrative	Units	Rate	Value
9/15/2022	JN	Reviewed documents for use in response to motion to bifurcate.[2.3]; Worked on issues regarding ER 904 objections[.3]; worked on declaration in support of motion to bifurcate and exhibit to same.[.4]	3	\$ 195.00	\$ 585.00
9/25/2022	JN	Reviewed summary and documents prepared by Mr. Thatcher and prepared email regarding same.[.3]; Conference with Ms. Saunder's and Mr. Thatcher regarding upcoming deposition.[.4]; Team meeting regarding deposition prep.[.7]	1.4	\$ 195.00	\$ 273.00
9/26/2022	JN	Prepared for deposition of Ms. Feoli.[.8]; reviewed email and exhibits from Mr. Thatcher regarding additional findings.[.3]; Worked on joint statement of evidence, preparing designations.[1.3]; Reviewed correspondence regarding production of responses to subpoena to American Express and setup secure access point for transmission of same.[.3]; Worked on preparing exhibits for filing with the court.[5.9]	8.6	\$ 195.00	\$ 1,677.00
9/27/2022	JN	Worked on processing of production documents.[.1]; reviewed email from Ms. Butler regarding inadvertent sending of emails between defense counsel, location of same, and prepared response confirming deletion of same.[.2]; Prepared notes and email regarding outstanding tasks for trial prep.[.5]; Prepared email to all counsel enclosing deposition corrections sheet for Ms. Jurgemeyer.[.1]; Worked on analysis of documents and comparison of data sets and prepared emails regarding same.[.5]; Reviewed data and documents for further proof that argument that absent class members were not referred and prepared emails regarding same.[.5]; Worked on review of exhibits and marking those in need of redaction.[1.3]; Team call regarding trial preparation.[.6]; Prepared email to Mr. Thatcher enclosing deposition transcript and update regarding American Express statements.[.1]	3.9	\$ 195.00	\$ 760.50
9/28/2022	JN	Reviewed email from Ms. Goodwin regarding deficiencies in exhibits uploaded and prepared response requesting extension of time to do so.[.1] Worked on resolution to issues raised by Ms. Goodwin[.4];	0.5	\$ 195.00	\$ 97.50

Date	Initials	Narrative	Units	Rate	Value
9/29/2022	JN	Worked on issues regarding logistics of informing court of settlement.[.1]	0.1	\$ 195.00	\$ 19.50
			<b>71.2</b>		<b>\$ 13,884.00</b>
9/13/2022	KG	Telephone call with B. Chandler regarding status of discovery, trial preparation and motion to compel.	0.7	\$ 425.00	\$ 297.50
9/13/2022	KG	Exchange emails with B. Chandler regarding preparation of motion to compel and discovery status.	0.4	\$ 425.00	\$ 170.00
9/14/2022	KG	Work on preparation of response to motion for protective order regarding tax returns.	1.2	\$ 425.00	\$ 510.00
9/16/2022	KG	Telephone call with B. Chandler regarding response to motion for protective order.	0.5	\$ 425.00	\$ 212.50
9/16/2022	KG	Exchange emails with B. Chandler regarding response to motion for protective order.	0.3	\$ 425.00	\$ 127.50
9/16/2022	KG	Continued work on preparation of draft response to motion for protective order.	1.5	\$ 425.00	\$ 637.50
9/16/2022	KG	Analysis and review of prior court orders and motions tom compel in preparation of draft response to motion for protective order.	0.8	\$ 425.00	\$ 340.00
9/17/2022	KG	Continued work on preparation of draft response to motion for protective order.	1.4	\$ 425.00	\$ 595.00
9/18/2022	KG	Continued work on draft response to defendant's motion for protective order.	4.5	\$ 425.00	\$ 1,912.50
9/19/2022	KG	Continued work on preparation of draft responses to defendants' motion for protective order.	1.7	\$ 425.00	\$ 722.50
9/19/2022	KG	Exchange emails with B. Terrell regarding draft response to motion for protective order.	0.4	\$ 425.00	\$ 170.00
9/20/2022	KG	Legal research and review of Washington law regarding production of personal tax returns for response to motion for protective order.	1.8	\$ 425.00	\$ 765.00
9/20/2022	KG	Continued work on preparation of revisions to draft response to motion for protective order.	2.6	\$ 425.00	\$ 1,105.00
9/20/2022	KG	Exchange numerous emails with B,. Terrell and B. Chandler regarding revisions to response to motion for protective order.	0.6	\$ 425.00	\$ 255.00

Date	Initials	Narrative	Units	Rate	Value
9/21/2022	KG	Exchange emails with B. Chandler regarding response to motion for protective order and status of trial preparation.	0.3	\$ 425.00	\$ 127.50
9/26/2022	KG	Analysis and review of Defendants' reply in support of motion for protective order.	0.5	\$ 425.00	\$ 212.50
			<b>19.2</b>		<b>\$ 8,160.00</b>
4/23/2021	LC	Investigated company (Seed) and created memo with findings[2.1]	2.1	\$ 125.00	\$ 262.50
8/24/2021	LC	Attended meeting re class declarations[0.2].	0.2	\$ 125.00	\$ 25.00
9/8/2021	LC	Prepared and sent out declaration inquiry emails to potential class members[1.0].	1	\$ 125.00	\$ 125.00
9/21/2021	LC	Had declaration interview conference call; sent email communications with notes[1.6].	1.6	\$ 125.00	\$ 200.00
			<b>4.9</b>		<b>\$ 612.50</b>
12/29/2021	MT	Set up web page for class action (1.5).	1.5	\$ 125.00	\$ 187.50
1/3/2022	MT	Worked on Proudlove website page (.5).	0.5	\$ 125.00	\$ 62.50
1/12/2022	MT	Finalized Proudlove class action page, edited content, and created exclusion form (3.5).	3.5	\$ 125.00	\$ 437.50
1/13/2022	MT	Edited class website page (1).	1	\$ 125.00	\$ 125.00
			<b>6.5</b>		<b>\$ 812.50</b>
6/24/2021	SS	Read response and preservation of evidence notice [.1]; reviewed and proofread subpoena documents [1.2].	1.3	\$ 325.00	\$ 422.50
6/25/2021	SS	Reviewed subpoena documents [.2]; email circulating subpoena documents for review [.1].	0.3	\$ 325.00	\$ 97.50
6/29/2021	SS	Email on subpoenas to Yahoo [.2]; reviewed proposed revision to subpoena definitions [.4]; incorporated edits to subpoena definitions [.2]; edited subpoena letter [.1]; reviewed documents for subpoena package [.3]; reviewed finalized subpoena package documents [.3].	1.5	\$ 325.00	\$ 487.50
7/1/2021	SS	Reviewed proposed email to opposing counsel following meet and confer.	0.2	\$ 325.00	\$ 65.00

Date	Initials	Narrative	Units	Rate	Value
7/2/2021	SS	Reviewed draft letter to opposing counsel following meet and confer.	0.2	\$ 325.00	\$ 65.00
7/6/2021	SS	Updated attachment to subpoena to Oath/Yahoo [.2].	0.2	\$ 325.00	\$ 65.00
7/7/2021	SS	Incorporated edits to attachment to subpoena [.3]; answered question on finalizing subpoena documents [.1]; reviewed finalized subpoena documents [.1]; reviewed CR 45 [.1].	0.6	\$ 325.00	\$ 195.00
7/9/2021	SS	Reviewed discovery letter from opposing counsel [.3]; compared proposed state protective order with sample federal court protective order [.4].	0.7	\$ 325.00	\$ 227.50
7/12/2021	SS	Compared proposed stipulated protective order with model [.4]; email summarizing differences between stipulated protective order and model [.1]; email suggesting proposed changes to protective order [.3].	0.8	\$ 325.00	\$ 260.00
7/22/2021	SS	Reviewed subpoena package [.3]; Checked on status of subpoena to Oath [.1].	0.4	\$ 325.00	\$ 130.00
7/23/2021	SS	Checked on status of Oath/Yahoo subpoena.	0.2	\$ 325.00	\$ 65.00
8/11/2021	SS	Reviewed email exchange on depositions [.1]; reviewed draft motion for class certification [.3].	0.4	\$ 325.00	\$ 130.00
10/4/2021	SS	Reviewed letter from C. Jayne re discovery requests.	0.1	\$ 325.00	\$ 32.50
10/5/2021	SS	Researched standards for request for inspection of out of state computer [.7]; continued research on request for inspection [.9].	1.6	\$ 325.00	\$ 520.00
10/5/2021	SS	Continued research on out-of-state inspection [1.3]; researched potential co-counsel in Nevada [.9].	2.2	\$ 325.00	\$ 715.00
10/15/2021	SS	Reviewed discovery letter.	0.2	\$ 325.00	\$ 65.00
10/18/2021	SS	Reviewed briefing on motion for class certification.	0.3	\$ 325.00	\$ 97.50
10/20/2021	SS	Case strategy videoconference with P. Arons and S. Leonard.	0.7	\$ 325.00	\$ 227.50
12/13/2021	SS	Videoconference with co-counsel re MSJ strategy.	0.3	\$ 325.00	\$ 97.50
			<b>12.2</b>		<b>\$ 3,965.00</b>
12/21/2020	TS	Prepared Pl's Primary Witness Disclosure (.1); and Dec of Service (.1)	0.2	\$ 125.00	\$ 25.00
4/16/2021	TS	Worked on pl's mtn for default [.2]; Decl of Paul Arons iso pl's mtn for default [.3]; [proposed] order [.3]; decl of service [.2]; notice of hearing [.2].	1.2	\$ 125.00	\$ 150.00

Date	Initials	Narrative	Units	Rate	Value
4/20/2021	TS	Worked on Pl's mtn for entry of default and sanctions [1.0]; decl of Paul Arons iso Pl's mtn [.7]; [proposed] order [.2]; notice of court hearing [.3]; decl of service [.4].	2.6	\$ 125.00	\$ 325.00
4/21/2021	TS	Finalized pl's mtn for default [.5]; decl of Paul Arons iso pl's mtn [.2]; notice of hearing [.1]; decl of service [.1]; [proposed] order [.2]; Filed same [.5].	1.6	\$ 125.00	\$ 200.00
4/23/2021	TS	Worked on pl's response to def's mtn to dismiss [.7]; decl of Paul Arons iso pl's response [.3]; decl of service [.2].	1.2	\$ 125.00	\$ 150.00
4/26/2021	TS	Worked on Pl's response to Def's mtn to dismiss, decl of Paul Arons w/12 exhibits, and service decl [.5]; filed same [.3].	0.8	\$ 125.00	\$ 100.00
6/29/2021	TS	Finalized Subpoena to Oath, Inc. [.1]; notice of intent [.1]; records custodian decl [.1]; sent em re: same [.1].	0.4	\$ 125.00	\$ 50.00
			<b>8</b>		<b>\$ 1,000.00</b>
3/11/2022	TJM	Worked on case and trial strategy issues [.6].	0.6	\$ 550.00	\$ 330.00
9/28/2022	TJM	Researched and analyzed issues regarding avenues of security for full payment owed under anticipated settlement agreement [.6].	0.6	\$ 550.00	\$ 330.00
			<b>1.2</b>		<b>\$ 660.00</b>
			<b>Total</b>		<b>\$ 653,924.50</b>
		<b>Total Reductions</b>	149.5		<b>\$ 22,115.00</b>

- Exhibit 2 -



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 FOR THE STATE OF WASHINGTON  
IN AND FOR COUNTY OF KING

MONTY LONG and DONALD GARCIA, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

vs.

FIRST RESOLUTION INVESTMENT CORPORATION,  
a Nevada corporation, and GORDON AYLWORTH  
& TAMI, P.C., an Oregon professional  
corporation,

Defendants.

NO. 19-2-11281-6 SEA

**FINAL APPROVAL ORDER AND JUDGMENT**

The Court, having considered Plaintiffs’ Motion for Final Approval of Class Action Settlement between Monty Long and Donald Garcia (“Plaintiffs”) and First Resolution Investment Corporation and Gordon Aylworth & Tami, P.C., (“Defendants”) in the above-captioned matter (the “Action”), the Class Action Settlement Agreement and Release entered into between Plaintiffs and Defendants (“Settlement”), Plaintiffs’ Motion for an Award of Attorneys’ Fees, Costs, and Class Representative Service Awards, and the lack of objections received regarding the proposed Settlement, the record in this the Action, the submissions and arguments presented by counsel, and, having held a Final Approval Hearing on August 28, 2020, finds that:

1           1.       Unless defined herein, all capitalized terms in this Final Approval Order shall  
2 have the same meanings as set forth in the Settlement.

3           2.       The Court has jurisdiction over the subject matter of the Action and over the  
4 settling parties, including the Settlement Class Members.

5           3.       On March 24, 2020, the Court preliminarily approved the Settlement and  
6 certified, for settlement purposes, the Class as defined in the Settlement.

7           4.       Pursuant to the Court's Preliminary Approval Order, the Postcard Notice was  
8 distributed to the Class by First Class mail. The Court hereby finds and concludes that the  
9 Postcard Notice was disseminated to members of the settlement Class in accordance with the  
10 terms set forth in the Settlement and in compliance with the Court's Preliminary Approval  
11 Order. The Court further finds and concludes that the Postcard Notice, and the distribution  
12 procedures set forth in the Settlement fully satisfy CR 23(c)(2) and the requirements of due  
13 process, were the best notice practicable under the circumstances, provided individual notice  
14 to all members of the Class who could be identified through reasonable effort, provided an  
15 opportunity for the Class Members to object or exclude themselves from the Settlement, and  
16 support the Court's exercise of jurisdiction over the Settlement Class Members as  
17 contemplated in the Settlement and this Final Approval Order.

18           5.       The Settlement Class Members were given an opportunity to object to the  
19 Settlement. No Settlement Class Members objected to the Settlement or requested exclusion  
20 from the Settlement.

21           6.       The Settlement was arrived at as a result of arms' length negotiations conducted  
22 in good faith by experienced attorneys familiar with the legal and factual issues of this case.

23           7.       The Settlement is fair, reasonable, adequate, and in the best interests of the  
24 Settlement Class in light of the complexity, expense, and duration of litigation, as well as the  
25 risk involved in establishing liability and damages and in maintaining the class action through  
26 trial and appeal.

27

1           8.       The consideration provided by the Settlement constitutes fair value given in  
2 exchange for the release of the Settlement Class Members' Released Claims against the  
3 Released Parties. The Court finds that the consideration provided to the Settlement Class  
4 Members is reasonable, considering the facts and circumstances of the claims and affirmative  
5 defenses asserted in the action, and the potential risks and likelihood of success of pursuing  
6 trial on the merits.

7                           **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

8           9.       The Settlement is finally approved as fair, reasonable, adequate, just, and in  
9 compliance with all applicable requirements of the applicable laws, and in the best interest of  
10 the Settlement Class. The Settlement Agreement, which shall be deemed incorporated herein,  
11 and all terms the Settlement are finally approved and shall be consummated in accordance with  
12 the terms and provisions thereof, except as amended by any subsequent order issued by the  
13 Court.

14           10.       Defendants shall pay the Settlement Fund amount of \$600,000, provide debt  
15 relief to all Settlement Class Members, file satisfactions of judgment in the lawsuits FRIC filed  
16 against Settlement Class Members, and request deletion of any tradelines related to Settlement  
17 Class Members, in accord with the schedule required under the Settlement Agreement.

18           11.       Pursuant to CR 23(b)(3), the Action is hereby certified, for settlement purposes  
19 only, as a class action on behalf of the following Settlement Class Members: all persons from  
20 whom FRIC collected or attempted to collect, directly or indirectly, at any time since April 25,  
21 2015, amounts owed (1) pursuant to a judgment FRIC obtained in a Washington state court  
22 prior to February 24, 2014; or (2) pursuant to a judgment John P. Plovie obtained and sought to  
23 collect on FRIC's behalf in a Washington state court after February 24, 2014.

24           12.       Pursuant to CR 23, the Court appoints Plaintiffs Monty Long and Donald Garcia  
25 as the Class Representatives and appoints Terrell Marshall Law Group PLLC and Leonard Law as  
26 Class Counsel.

1           13.     For settlement purposes only, the Court finds that the Action satisfies the  
2 applicable prerequisites for class action treatment under CR 23(a) and (b)(3), namely:

- 3           • The Class is so numerous that joinder of all members is impracticable;
- 4           • There are questions of law and fact common to the Class Members;
- 5           • The claims of the Class Representatives are typical of the claims of the  
6 Settlement Class Members;
- 7           • The Class Representatives and Class Counsel have fairly and adequately  
8 represented and protected the interests of all the Settlement Class  
9 Members;
- 10          • Common issues predominate over any individualized issues; and
- 11          • A class action is superior to thousands of individual actions.

12           14.     The Plaintiffs, Settlement Class Members, and their successors and assigns have  
13 released claims pursuant to the release contained in the Settlement. The Released Claims are  
14 compromised, settled, released, discharged, and dismissed with prejudice by virtue of these  
15 proceedings and this Final Approval Order.

16           15.     To the extent permitted by law and without affecting the other provisions of this  
17 Final Approval Order, this Final Approval Order is intended by the parties and the Court to be  
18 *res judicata* and to prohibit and preclude any prior, concurrent, or subsequent litigation  
19 brought individually, or in the name of, or otherwise on behalf of, Plaintiffs or any Settlement  
20 Class Member with respect to the Settlement Class Member Released Claims based upon the  
21 same alleged facts.

22           16.     The Court hereby retains continuing and exclusive jurisdiction over the parties  
23 and all matters relating to the Action or Settlement, including the administration,  
24 interpretation, construction, effectuation, enforcement, and consummation of the Settlement,  
25 including its injunctive provisions, and this Final Approval Order. This Final Approval Order  
26 finally disposes of all claims and is appealable.

27

1           17.     This Final Approval Order is not, and shall not be construed as, an admission by  
2 Defendants of any liability or wrongdoing in this or in any other proceeding.

3           18.     The Court approves Class Counsel’s application for \$200,000 in attorneys’ fees  
4 and \$13,633 in costs. This amount reflected actual costs incurred and an attorneys’ fee award  
5 of one-third of the Settlement Fund.

6           19.     The Settlement created a common fund for the benefit of Class Members.  
7 Accordingly, the Court finds that the percentage of the fund method is the appropriate method  
8 to use in determining the appropriate fee award in this case. *Bowles v. Wash. Dep’t of Ret. Sys.*,  
9 121 Wn.2d 52, 72, 847 P.2d 440 (1993).

10          20.     Class Counsel obtained an excellent result for the Settlement Class. Class  
11 Counsel’s work lead to the creation of a \$600,000 common fund. In addition, the Settlement  
12 provides \$20 million in debt relief to the Settlement Class Members.

13          21.     An attorneys’ fee award equal to one-third of a common fund is appropriate in  
14 consumer protection class action cases. *Terrell v. Costco Wholesale Corp.*, No. 16-2-19140-1-  
15 SEA (King Cnty. Sup. Ct. June 19, 2018); *Dougherty v. Barrett Business Services Inc.*, No. 17-2-  
16 05619-1 (Clark Cnty. Sup. Ct. Nov. 8, 2019); *Strong v. Numerica Credit Union*, No. 17-2-01406-39  
17 (Yakima Cnty. Sup. Ct. Feb. 14, 2020).

18          22.     The Court has considered the factors set forth in Washington Rule of  
19 Professional Conduct 1.5(a) in concluding that the requested fee is reasonable. Specifically:

- 20           a.     The case raised novel and difficult questions of law, which demanded litigators  
21                 with the skill and experience of Class Counsel.
- 22           b.     Class Counsel’s work on this matter precluded work on other matters.
- 23           c.     A one-third fee in contingency cases is customary in this county.
- 24           d.     The excellent results obtained, and the amount of time involved support the  
25                 award.

26          23.     The Court approves service awards to the Class Representatives in the amount of  
27 \$5,000 each, to be paid from the Settlement Fund.

1 24. The Court further approves and authorizes the deduction of an amount not to  
2 exceed \$8,347 from the Settlement Fund to cover the Class Administrator's costs.

3 25. The attorneys' fees and costs, service awards, and settlement administration  
4 costs are to be deducted from the Settlement Fund as set forth in the Settlement. Save and  
5 except as expressly set forth to the contrary in this Final Approval Order, Plaintiffs and Class  
6 Counsel shall take nothing by their claims and each party shall bear his or its own fees, costs,  
7 and expenses in connection with this Action. Except for the award to Class Counsel specified  
8 above, no fees or funds shall be paid to any other counsel representing any Settlement Class  
9 Members.

10 26. The Court hereby dismisses the Action against Defendants, including all claims  
11 against said Defendants, with prejudice, without costs to any party, except as expressly  
12 provided for in the Settlement and this Order.

13 27. Finding that there is no just reason for delay, the Court orders that this Final  
14 Approval Order shall constitute a final judgment pursuant to CR 58 that is binding on the  
15 settling parties and the Settlement Class.

16 **IT IS HEREBY ORDERED.**

17 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

18 \_\_\_\_\_  
19 THE HONORABLE KEN SCHUBERT  
20  
21  
22  
23  
24  
25  
26  
27

1 Presented by:

2 TERRELL MARSHALL LAW GROUP PLLC

3  
4 By: /s/ Blythe H. Chandler, WSBA #43387

5 Beth E. Terrell, WSBA #26759

6 Email: bterrell@terrellmarshall.com

7 Blythe H. Chandler, WSBA #43387

8 Email: bchandler@terrellmarshall.com

9 Benjamin M. Drachler, WSBA #51021

10 Email: bdrachler@terrellmarshall.com

11 936 North 34th Street, Suite 300

12 Seattle, Washington 98103-8869

13 Telephone: (206) 816-6603

14 Facsimile: (206) 319-5450

15  
16 Samuel R. Leonard, WSBA #46498

17 Email: sam@seattledbtdefense.com

18 LEONARD LAW

19 1001 4th Avenue, Suite 3200

20 Seattle, Washington 98154

21 Telephone: (206) 486-1176

22 Facsimile: (206) 458-6028

23  
24 *Attorneys for Plaintiffs*

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 19-2-11281-6  
Case Title: LONG ET ANO vs FIRST RESOLUTION INVESTMENT  
CORPORATION ET AL  
Document Title: ORDER RE APPROVING FEES AND FINAL SETTLEMENT  
Signed by: Ken Schubert  
Date: 8/28/2020 4:27:47 PM



---

Judge/Commissioner: Ken Schubert

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 20DA9CAD30E9A356B2B090778A254A4188865BEC  
Certificate effective date: 11/13/2018 11:21:11 AM  
Certificate expiry date: 11/13/2023 11:21:11 AM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Ken Schubert:  
EPj/VAvS5hGqrSf3AFk6yQ=="



- Exhibit 3 -

20 FEB 14 10:08

SUPERIOR COURT  
YAKIMA CO. W.

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
COUNTY OF YAKIMA

THEODORE STRONG,

Plaintiff,

v.

NUMERICA CREDIT UNION,

Defendant.

NO. 17-2-01406-39

**AMENDED [PROPOSED] ORDER  
GRANTING PLAINTIFF'S  
UNOPPOSED MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND AWARD OF  
ATTORNEYS' FEES, COSTS AND  
SERVICE AWARD**

The Court, having considered Plaintiff's Motion for Final Approval of Class Action Settlement and Award of Attorneys' Fees, Costs and Service Award in the above-captioned matter (the "Action"), the Settlement Agreement and Release entered into between Plaintiff Theodore Strong ("Plaintiff") and Numerica Credit Union ("Defendant"), the lack of objections to and requests for exclusion from the proposed Settlement, the record in this the Action, the submissions and arguments presented by counsel, and having held a Final Approval Hearing on February 14, 2020, finds that:

1. All capitalized terms in this Final Approval Order shall have the same meanings as set forth in the Settlement Agreement.
2. The Court has jurisdiction over the subject matter of the Action and over the settling parties, including the members of the Settlement Class.

1           3.       On October 8, 2019, the Court preliminarily approved the Settlement and  
2 certified, for settlement purposes, the Class as defined in the Settlement Agreement.

3           4.       Pursuant to the Court's Preliminary Approval Order, notice of the Settlement  
4 was distributed to the Class by certified mail, US Mail, and email. The Court hereby finds and  
5 concludes that the notice was disseminated to members of the Class in accordance with the  
6 terms set forth in the Settlement and in compliance with the Court's Preliminary Approval  
7 Order. The Court further finds and concludes that the notice, and the distribution procedures set  
8 forth in the Settlement fully satisfy CR 23(c)(2) and (e) and the requirements of due process,  
9 were the best notice practicable under the circumstances, provided individual notice to all  
10 members of the Class who could be identified through reasonable effort, provided an  
11 opportunity for the Class Members to object or exclude themselves from the Settlement, and  
12 support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the  
13 Settlement Agreement and this Final Approval Order.

14           5.       The Class Members were given an opportunity to object to the Settlement. No  
15 Class Members objected to the Settlement and no Class Members requested exclusion from the  
16 Settlement.

17           6.       The Settlement was arrived at as a result of arms' length negotiations conducted  
18 in good faith by experienced attorneys familiar with the legal and factual issues of this case.

19           7.       The Settlement is fair, reasonable, adequate, and in the best interests of the  
20 Settlement Class in light of the complexity, expense, and duration of litigation, as well as the  
21 risk involved in establishing liability and damages and in maintaining the class action through  
22 trial and appeal.

23           8.       The consideration provided by the Settlement constitutes fair value given in  
24 exchange for the release of the Released Claims against the Released Parties by Settlement  
25 Class Members. The Court finds that the consideration provided to members of the Settlement  
26 Class is reasonable, considering that facts and circumstances of the claims and affirmative

1 defenses asserted in the action, and the potential risks and likelihood of success of alternatively  
2 pursuing trial on the merits.

3 **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

4 9. The Settlement is finally approved as fair, reasonable, adequate, just, and in  
5 compliance with all applicable requirements of the applicable laws, and in the best interest of  
6 the Settlement Class. The Settlement Agreement, which shall be deemed incorporated herein,  
7 and all terms of the Settlement are finally approved and shall be consummated in accordance  
8 with the terms and provisions thereof, except as amended by any subsequent order issued by  
9 the Court.

10 10. Pursuant to CR 23(c)(3), the Action is hereby certified, for settlement purposes  
11 only, as a class action on behalf of the following Settlement Class Members: All persons who:

- 12 (a) resided in Washington state when they purchased or otherwise financed a vehicle  
13 primarily for personal, family, or household use;  
14 (b) whose contract was assigned to Defendant or financing was provided by Defendant;  
15 and  
16 (c) to whom Defendant issued or failed to issue a Notice of Intent to Sell, pursuant to  
17 RCW 62A.9A-614 during the period April 14, 2015 through May 17, 2017 and/or to  
18 whom Defendant issued or failed to issue a Notice of Deficiency, pursuant to RCW  
19 62A.9A- 616, during the period April 14, 2015 through July 31, 2018.

20 Excluded from the class are all persons who (a) filed for bankruptcy protection as to their  
21 Numerica auto loan and whose bankruptcy case was not dismissed or otherwise closed as of the  
22 date of this Settlement Agreement; or (b) against whom Defendant's assignee obtained a  
23 judgment to collect on their Deficiency Balance before May 20, 2019, which judgments are  
24 held by unrelated third party debt collectors.

25 11. The Plaintiff and each Settlement Class Member, their respective heirs,  
26 executors, administrators, representatives, agents, attorneys, partners, affiliates, successors,  
27 predecessors-in-interest, and assigns are deemed to have released, waive, acquitted, and  
discharged forever each of the Released Parties from each of the Released Claims, as defined in  
the Settlement Agreement. The Released Claims are compromised, settled, released,

1 discharged, and dismissed with prejudice by virtue of these proceedings and this Final  
2 Approval Order, provided, however, that the Released Claims shall not be construed to limit  
3 the right of Defendant or any member of the Settlement Class to enforce the terms of the  
4 Settlement.

5 12. This Final Approval Order is binding on all Settlement Class Members.

6 13. To the extent permitted by law and without affecting the other provisions of this  
7 Final Approval Order, this Final Approval Order is intended by the parties and the Court to be  
8 *res judicata* and to prohibit and preclude any prior, concurrent, or subsequent litigation brought  
9 individually, or in the name of, and/or otherwise on behalf of, Plaintiff or any Settlement Class  
10 Member with respect to the Released Claims based upon the same alleged facts.

11 14. The Court retains continuing and exclusive jurisdiction over the parties and all  
12 matters relating to the Action and Settlement, including the administration, interpretation,  
13 construction, effectuation, enforcement, and consummation of the Settlement, including its  
14 injunctive provisions, and this Final Approval Order..

15 15. This Final Approval Order is not, and shall not be construed as, an admission by  
16 Defendant of any liability or wrongdoing in this or in any other proceeding.

17 16. The Court approves Class Counsel's application for \$348,540.51 in attorneys'  
18 fees and \$18,126.16 in costs, which, together, represents one-third of the Settlement Fund.

19 17. The Settlement created a common fund for the benefit of Settlement Class  
20 Members. Accordingly, the Court finds that the percentage of the fund method is the  
21 appropriate method to use in determining the appropriate fee award in this case. *Bowles v.*  
22 *Wash. Dep't of Ret. Sys.*, 121 Wn.2d 52, 72, 847 P.2d 440 (1993).

23 18. Class Counsel obtained an excellent result for the Settlement Class. Class  
24 Counsel's work lead to the creation of a \$1.1 million common fund from which Settlement  
25 Class Members whose statutory damages under the UCC are greater than their remaining  
26 Deficiency Balance will receive cash payments. The Settlement benefits also include

27 AMENDED [PROPOSED] ORDER GRANTING  
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT AND  
AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE  
AWARD - 4  
CASE NO. 17-2-01406-39

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

1 Numerica’s agreement to request permanent deletion of the “tradeline” for Settlement Class  
2 Members’ Numerica auto loans their credit reports and Numerica’s dismissal all pending legal  
3 actions to collect those Deficiency Balances. Numerica also agrees to permanently cease  
4 collection of all remaining Deficiency Balances of the Settlement Class Members whose  
5 statutory damages are less than their Deficiency Balance or who do not have statutory  
6 damages—which amounts to approximately \$8,330,822.93 in debt waiver. However, if a  
7 Settlement Class Member brings any claim against Numerica that is not subject to the Release,  
8 Numerica may assert that the Settlement Class Member’s Deficiency Balance is an offset to  
9 that claim.

10 19. An attorneys’ fee and cost award equal to one-third of a common fund is  
11 appropriate in this case and is in line with cases litigated under the UCC and attorneys’ fees and  
12 costs awarded by Washington courts. *See* Final Judgment Approving Settlement and Certifying  
13 Settlement Class at 6, *Gales v. Capital One*, Case No. 8:13-cv-01624-WGC (D. Md. August 5,  
14 2015), ECF No. 78 (approving fee award of one-third in UCC class action); Final Judgment,  
15 *Smith v. Toyota Motor Credit Corporation*, Case No. 12-02029-WDQ (D. Md. Oct. 2, 2014),  
16 ECF No. 53 (approving fee award of 49% in UCC class action); *see also A.M. v. Moda Health*  
17 *Plan, Inc.*, C 14-1191 TSZ, 2015 WL 9839771, at \*3 (W.D. Wash. Nov. 3, 2015) (awarding fee  
18 of 35% of settlement fund); Order Approving Award of Attorneys’ Fees and Costs, *Terrell v.*  
19 *Costco Wholesale Corp.*, No. 16-2-10140-1 SEA, (King Cty. Sup. Ct. June 19, 2018) (awarding  
20 one-third of fund in class action under the Fair Credit Reporting Act).

21 20. The Court approves a service award to the Named Plaintiff in the amount of  
22 \$10,000, to be paid from the Settlement Fund. This amount is reasonable in light of Plaintiff’s  
23 efforts in this case, which included assisting his counsel with the investigation of his claims,  
24 responding to written discovery, being deposed, and assisting with settlement negotiations.

25 21. The Court further approves and authorizes the deduction of an amount not to  
26 exceed \$29,500 from the Settlement Fund to cover the Class Administrator’s costs.



1           22.     The attorneys' fees and costs, service award, and settlement administration costs  
2 are to be deducted from the Settlement Fund as set forth in the Settlement Agreement. Except  
3 as expressly set forth to the contrary in this Final Approval Order, Plaintiff and Class Counsel  
4 shall take nothing by their claims and each party shall bear his or its own fees, costs, and  
5 expenses in connection with this Action. Except for the award to Class Counsel specified  
6 above, no fees or funds shall be paid to any other counsel representing any Settlement Class  
7 Members.

8           23.     The Court dismisses the Action against Defendant, including all claims against  
9 Defendant, with prejudice, without costs to any party, except as expressly provided for in the  
10 Settlement.

11           24.     Finding that there is no just reason for delay, the Court orders that this Final  
12 Approval Order shall constitute a final judgment pursuant to CR 58 that is binding on the  
13 settling parties and the Settlement Class.

14           IT IS HEREBY ORDERED.

15           DATED this 14 day of FEB, 2020.

16  
17  
18 

19           \_\_\_\_\_  
SUPERIOR COURT JUDGE

20           Blaine G. Gibson

21           Judge

1 Presented by:

2 TERRELL MARSHALL LAW GROUP PLLC

3  
4 

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

6 Beth E. Terrell, WSBA #26759  
7 Email: bterrell@terrellmarshall.com  
8 Maria Hoisington-Bingham, WSBA #51493  
9 Email: mhoisington@terrellmarshall.com  
10 936 North 34th Street, Suite 300  
11 Seattle, Washington 98103-8869  
12 Telephone: (206) 816-6603  
13 Facsimile: (206) 319-5450

14 Alexander B. Trueblood, WSBA #50612  
15 Email: alec@hush.com  
16 TRUEBLOOD LAW FIRM  
17 10940 Wilshire Boulevard, Suite 1600  
18 Los Angeles, California 90024  
19 Telephone: (310) 443-4139  
20 Facsimile: (310) 943-2255

21 *Attorneys for Plaintiff*

22  
23  
24  
25  
26  
27 AMENDED [PROPOSED] ORDER GRANTING  
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT AND  
AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE  
AWARD - 7  
CASE No. 17-2-01406-39

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



- Exhibit 4 -

72

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

THE HONORABLE DAVID E. GREGERSON  
Department 2

**FILED**  
**NOV 08 2019**

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
COUNTY OF CLARK

Scott G. Weber, Clerk, Clark Co

11:26

AMANDA DOUGHERTY, individually and as  
a representative of the class,

Plaintiff,

v.

BARRETT BUSINESS SERVICES, INC.,

Defendant.

NO. 17-2-05619-1

**FINAL APPROVAL**  
**ORDER AND ENTRY OF**  
**JUDGMENT**

The Court, having considered Plaintiff's Motion for Final Approval of Class Action Settlement between Plaintiff Amanda Dougherty ("Plaintiff") and Barrett Business Services, Inc. ("Defendant") in the above-captioned matter (the "Action"), the Class Action Settlement Agreement and Release entered into between Plaintiff and Defendant ("Settlement"), Plaintiff's Motion for an Award of Attorneys' Fees, Costs, and Class Representative Service Award, and the lack of objections received regarding the proposed Settlement, the record in this the Action, the submissions and arguments presented by counsel, and, having held a Final Approval Hearing on November 8, 2019, finds that:

1. Unless defined herein, for purposes of this Final Approval Order, all capitalized terms in this Final Approval Order shall have the same meanings as set forth in the Settlement.
2. The Court has jurisdiction over the subject matter of the Action and over the settling parties, including the members of the Settlement Class.

1           3.       On June 28, 2018, the Court preliminarily approved the Settlement and certified,  
2 for settlement purposes, the Settlement Class as defined in the Settlement.

3           4.       Pursuant to the Court's Preliminary Approval Order, the Notice was distributed  
4 to the Class by email and US Mail. The Court hereby finds and concludes that the Notice was  
5 disseminated to members of the Settlement Class in accordance with the terms set forth in the  
6 Settlement and in compliance with the Court's Preliminary Approval Order. The Court further  
7 finds and concludes that the Notice, and the distribution procedures set forth in the Settlement  
8 fully satisfy CR 23(c)(2) and the requirements of due process, were the best notice practicable  
9 under the circumstances, provided individual notice to all members of the Settlement Class who  
10 could be identified through reasonable effort, provided an opportunity for the Settlement Class  
11 Members to object or exclude themselves from the Settlement, and support the Court's exercise  
12 of jurisdiction over the Settlement Class as contemplated in the Settlement and this Final  
13 Approval Order.

14           5.       The Settlement Class Members were given an opportunity to object to the  
15 Settlement. No Settlement Class Members objected to the Settlement. The Settlement Class  
16 Members who made valid and timely requests for exclusion are excluded from the Settlement  
17 and are not bound by this Final Approval Order. Three Settlement Class Members requested  
18 exclusion. The identities of such persons are set forth in the Declaration of Jennifer M. Keogh  
19 that was filed in support of Plaintiffs' Motion for Final Approval.

20           6.       The Settlement was arrived at as a result of arms' length negotiations conducted  
21 in good faith by experienced attorneys familiar with the legal and factual issues of this case.

22           7.       The Settlement is fair, reasonable, adequate, and in the best interests of the  
23 Settlement Class in light of the complexity, expense, and duration of litigation, as well as the  
24 risk involved in establishing liability and damages and in maintaining the class action through  
25 trial and appeal.  
26



1           8.     The consideration provided by the Settlement constitutes fair value given in  
2 exchange for the release of the Settlement Class Member Released Claims against the Released  
3 Parties. The Court finds that the consideration provided to members of the Settlement Class is  
4 reasonable, considering that facts and circumstances of the claims and affirmative defenses  
5 asserted in the action, and the potential risks and likelihood of success of alternatively pursuing  
6 trial on the merits.

7                   **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

8           9.     The Settlement is finally approved as fair, reasonable, adequate, just, and in  
9 compliance with all applicable requirements of the applicable laws, and in the best interest of  
10 the Settlement Class. The Settlement Agreement, which shall be deemed incorporated herein,  
11 and all terms the Settlement are finally approved and shall be consummated in accordance with  
12 the terms and provisions thereof, except as amended by any subsequent order issued by the  
13 Court.

14          10.    Pursuant to CR 23(c)(3), the Action is hereby certified, for settlement purposes  
15 only, as a class action on behalf of the following Settlement Class Members: all individuals on  
16 whom Defendant obtained a consumer report for employment purposes containing a liability  
17 release or an overbroad authorization from August 26, 2013 to June 28, 2019.

18          11.    Pursuant to CR 23, the Court certifies Plaintiff Amanda Dougherty as the Class  
19 Representative and appoints Terrell Marshall Law Group, PLLC and Berger Montague PC as  
20 Class Counsel.

21          12.    For settlement purposes only, the Court finds that the Action satisfies the  
22 applicable prerequisites for class action treatment under CR 23(a) and (b)(3), namely:

- 23               • The Settlement Class is so numerous that joinder of all members is
- 24               impracticable;
- 25               • There are questions of law and fact common to the Settlement Class
- 26               Members;

- 1 • The claims of the Class Representative are typical of the claims of the
- 2 Settlement Class Members;
- 3 • The Class Representative and Class Counsel have fairly and adequately
- 4 represented and protected the interests of all of the Settlement Class
- 5 Members;
- 6 • Common issues predominate over any individualized issues; and
- 7 • A class action is superior to thousands of individual actions.

8 13. The Plaintiff, Settlement Class Members, and their successors and assigns are  
9 permanently barred and enjoined from instituting or prosecuting, either individually or as a  
10 class, or in any other capacity, any of the Settlement Class Member Released Claims against  
11 any of the Released Parties, as set forth in the Settlement. Pursuant to the release contained in  
12 the Settlement, the Released Claims are compromised, settled, released, discharged, and  
13 dismissed with prejudice by virtue of these proceedings and this Final Approval Order,  
14 provided, however, that the Settlement Class Member Released Claims shall not be construed  
15 to limit the right of Defendant or any member of the Settlement Class to enforce the terms of  
16 the Settlement.

17 14. This Final Approval Order is binding on all Settlement Class Members, except  
18 those individuals who validly and timely excluded themselves from the Settlement. The identities  
19 of such persons are set forth in the Supplemental Declaration of Jennifer M. Keogh that was filed  
20 in support of Plaintiffs' Motion for Final Approval.

21 15. To the extent permitted by law and without affecting the other provisions of this  
22 Final Approval Order, this Final Approval Order is intended by the parties and the Court to be  
23 *res judicata* and to prohibit and preclude any prior, concurrent, or subsequent litigation brought  
24 individually, or in the name of, and/or otherwise on behalf of, Plaintiff or any Settlement Class  
25 Member with respect to the Settlement Class Member Released Claims based upon the same  
26 alleged facts.



1           16.     The Court hereby retains continuing and exclusive jurisdiction over the parties  
2 and all matters relating to the Action and/or Settlement, including the administration,  
3 interpretation, construction, effectuation, enforcement, and consummation of the Settlement,  
4 including its injunctive provisions, and this Final Approval Order. This Final Approval Order  
5 finally disposes of all claims and is appealable.

6           17.     This Final Approval Order is not, and shall not be construed as, an admission by  
7 Defendant of any liability or wrongdoing in this or in any other proceeding.

8           18.     The Court approves Class Counsel's application for \$528,752.51 in attorneys'  
9 fees and costs. This amount reflected actual costs incurred and an attorneys' fee award of one-  
10 third of the Settlement Fund.

11           19.     The Settlement created a common fund for the benefit of class members.  
12 Accordingly, the Court finds that the percentage of the fund method is the appropriate method  
13 to use in determining the appropriate fee award in this case. *Bowles v. Wash. Dep't of Ret. Sys.*,  
14 121 Wn.2d 52, 72, 847 P.2d 440 (1993).

15           20.     Class Counsel obtained an excellent result for the Settlement Class. Class  
16 Counsel's work lead to the creation of a \$1.5 million common fund. More than 10% of the  
17 Class submitted claims, and each class member who submitted a claim will be paid an  
18 estimated \$129. These results exceed those achieved in similar cases.

19           21.     An attorneys' fee award equal to one-third of a common fund is appropriate in  
20 cases litigated under the Fair Credit Reporting Act. *King v. Gen. Info. Serv., Inc.*, No. 10-cv-  
21 6850, ECF No. 126 (E.D. Penn. Nov. 4, 2014) (awarding counsel one-third of fund in FCRA  
22 class action); *Ford v. CEC Entm't Inc.*, No. 14CV677 JLS (JLB), 2015 WL 11439033, at \*1  
23 (S.D. Cal. Dec. 14, 2015) (awarding fee of one-third in FCRA class action); *Razilov v.*  
24 *Nationwide Mut. Ins. Co.*, No. 01-CV-1466-BR, 2006 WL 3312024, at \*1 (D. Or. Nov. 13,  
25 2006).

1           22.     The Court has considered the factors set forth in Washington Rule of  
2 Professional Conduct 1.5(a) in concluding that the requested fee is reasonable. Specifically:

- 3           a.     The case raised novel and difficult questions of law, which demanded litigators
- 4                 with the skill and experience of Class Counsel.
- 5           b.     Class Counsel's work on this matter precluded work on other matters.
- 6           c.     A one-third fee in contingency cases is customary in this county.
- 7           d.     The excellent results obtained and the amount of time involved support the
- 8                 award.

9           23.     The Court approves a service award to the Named Plaintiff in the amount of  
10 \$3,500, to be paid from the Settlement Fund.

11          24.     The Court further approves and authorizes the deduction of an amount not to  
12 exceed \$82,040.94 from the Settlement Fund to cover the Settlement Administrator's costs.

13          25.     The attorneys' fees and costs, service award, and settlement administration costs  
14 are to be deducted from the Settlement Fund as set forth in the Settlement. Save and except as  
15 expressly set forth to the contrary in this Final Approval Order, Plaintiff and Class Counsel  
16 shall take nothing by their claims and each party shall bear his or its own fees, costs, and  
17 expenses in connection with this Action. Except for the award to Class Counsel specified  
18 above, no fees or funds shall be paid to any other counsel representing any Settlement Class  
19 Members.

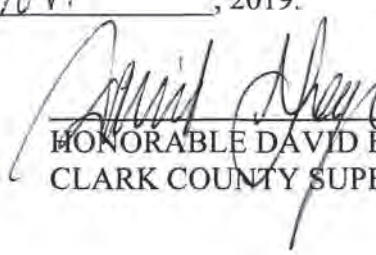
20          26.     The Court hereby dismisses the Action against Defendant, including all claims  
21 against said Defendant, with prejudice, without costs to any party, except as expressly provided  
22 for in the Settlement.

23          27.     Finding that there is no just reason for delay, the Court orders that this Final  
24 Approval Order shall constitute a final judgment pursuant to CR 58 that is binding on the  
25 settling parties and the Settlement Class.



1 **IT IS HEREBY ORDERED.**

2 DATED this 7 day of Nov., 2019.

3  
4   
5 \_\_\_\_\_  
6 HONORABLE DAVID E. GREGERSON  
7 CLARK COUNTY SUPERIOR COURT JUDGE  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26



- Exhibit 5 -

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

JULIUS TERRELL, as an individual and as a  
representative of the class,

Plaintiff,

v.

COSTCO WHOLESALE CORP.,

Defendant.

NO. 16-2-19140-1 SEA

~~[PROPOSED]~~ ORDER APPROVING  
AWARD OF ATTORNEYS' FEES AND  
COSTS

THIS MATTER came before the Court on June 15, 2018, on Plaintiff's Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and Class Representative Service Award. On June 15, 2018, the Court entered an order granting final approval of the Class Settlement, approving payment of the requested attorney's fees, costs and costs of settlement administration, and awarding a class representative service award. The Court makes the following additional findings regarding its award of attorneys' fees, costs and service award.

The Court heard oral argument on June 15, 2018, and has considered the following submissions:

- 1           1.     Plaintiff's Motion for Attorneys' Fees, Costs, and Class Representative Service
- 2           Award;
- 3           2.     The Declaration of E. Michelle Drake in support of Plaintiff's Motion for
- 4           Attorneys' Fees, Costs, and Class Representative Service Award;
- 5           3.     The Declaration of Jennifer M. Keough Regarding Notice Administration and
- 6           Administration Costs; and
- 7           4.     Plaintiff's Motion for Final Approval of Class Action Settlement and supporting
- 8           documentation.

9           Based on the foregoing, the Court makes the following FINDINGS AND  
10 CONCLUSIONS:

- 11           1.     Class Counsel is highly qualified. Berger & Montague, P.C. and Terrell
- 12 Marshall Law Group, are class action litigators with nationally known reputations, and
- 13 extensive experience litigating Fair Credit Reporting Act cases.
- 14           2.     Throughout the litigation, Class Counsel provided high quality representation in
- 15 a case that turned out to be quite complex.
- 16           3.     Class Counsel obtained an excellent result for the Settlement Class. Class
- 17 Counsel's work lead to the creation of a \$2.49 million common fund. Nearly 20% of the Class
- 18 submitted claims, and each class member who submitted a claim will be paid an estimated \$63.
- 19 These results exceed those achieved in similar cases.
- 20           4.     The Settlement created a common fund for the benefit of class members.
- 21 Accordingly, the Court finds that the percentage of the fund method is the appropriate method
- 22 to use in determining the appropriate fee award in this case. *Bowles v. Wash. Dep't of Ret. Sys.*,
- 23 121 Wn.2d 52, 72, 847 P.2d 440 (1993).
- 24           5.     An attorneys' fee award equal to one-third of a common fund is appropriate in
- 25 cases litigated under the Fair Credit Reporting Act. *King v. Gen. Info. Serv., Inc.*, No. 10-cv-
- 26 6850, ECF No. 126 (E.D. Penn. Nov. 4, 2014) (awarding counsel one-third of fund in FCRA



1 class action); *Ford v. CEC Entm't Inc.*, No. 14CV677 JLS (JLB), 2015 WL 11439033, at \*1  
2 (S.D. Cal. Dec. 14, 2015) (awarding fee of one-third in FCRA class action); *Razilov v.*  
3 *Nationwide Mut. Ins. Co.*, No. 01-CV-1466-BR, 2006 WL 3312024, at \*1 (D. Or. Nov. 13,  
4 2006).

5 6. The Court has considered the factors set forth in Washington Rule of  
6 Professional Conduct 1.5(a) in concluding that the requested fee is reasonable. Specifically:

- 7 a. The case raised novel and difficult questions of law, which demanded  
8 litigators with the skill and experience of Class Counsel.  
9 b. Class Counsel's work on this matter precluded work on other matters.  
10 c. A one-third fee in contingency cases is customary in this county.  
11 d. The excellent results obtained and the amount of time involved support  
12 the award.

13 7. While the Court concludes that the percentage-of-the-fund method is appropriate  
14 here, the Court concludes that the lodestar method confirms that the requested fee is reasonable.  
15 Class Counsel devoted over 513 hours to the investigation, development, litigation and  
16 resolution of this case, incurring over \$222,400.30 in lodestar. The Court has reviewed Class  
17 Counsel's contemporaneous billing records documenting the hours worked and finds the hours  
18 expended reasonable.

19 8. Class Counsel calculated their lodestar using reasonable hourly rates.

- 20 a. The following hourly rates billed by Berger and Montague are  
21 reasonable given the experience and skill of counsel:

22

Timekeeper	Experience	Rate
E. Michelle Drake	Partner with 17 years of experience	\$700
Joseph Hashmall	Associate with 7 years of experience	\$515
John Albanese	Associate with 6 years of experience	\$430
Jean Hibray, Jean Ebersperger and Mai Xiong	Paralegals	\$230-\$280

23  
24  
25  
26



1           b.       The following hourly rates billed by Terrell Marshall Law Group are  
2                   reasonable given the experience and skill of counsel:

Timekeeper	Experience	Rate
Beth E. Terrell	Partner with 23 years of experience.	\$500
Amanda M. Steiner	Partner with 21 years of experience.	\$495
Jennifer R. Murray	Partner with 13 years of experience.	\$450
Maria C. Hoisington	Associate with 2 years of experience.	\$225
Bradford Kinsey, Holly Rota, Hannelore Ohaus, Samuel Levy	Paralegals and legal assistants.	\$75-\$100

3  
4  
5  
6  
7  
8  
9  
10       9.       Similar rates have been approved numerous times in class action cases brought  
11 in both the Western District of Washington and King County Superior Court. See, *e.g.*, *Carideo*  
12 *v. Dell, Inc.*, No. 06-cv-01772, ECF No. 162 (W.D. Wash. Dec. 17, 2010) (Judge Robart  
13 approving as reasonable a fee petition which included rates ranging from \$175 to \$600);  
14 *Barnett v. Wal-Mart Stores, Inc.*, No. 01-2-24553-8 (King Co., July 20, 2009) (Judge Spector  
15 approving fee request based on rates ranging from \$100 to \$760); *Splater v. Thermal Ease*  
16 *Hydronic Systems, Inc.*, No. 03-2-33553-3 (King Co., July 31, 2009) (Judge Washington  
17 approving fee request based on rates ranging from \$100 to \$760); *Hartman v. Comcast*  
18 *Business Communications, LLC*, No. 10-0413, ECF No. 106 (W.D. Wash Dec. 8, 2011) (Judge  
19 Lasnik approving Plaintiff's counsel's fee request based on rates ranging from \$180 to \$650).  
20 Class Counsel are experienced, highly regarded members of the bar with extensive expertise in  
21 the area of class actions and complex litigation involving Fair Credit Reporting Act claims like  
22 those at issue here. Their requested hourly rates are reasonable in light of their qualifications  
23 and experience.

24       10.       Class Counsel's requested fee of \$830,000 represents a 3.73 multiplier on their  
25 total lodestar to date. This requested multiplier is reasonable considering that counsel is seeking  
26 one-third of the common fund created through the Settlement. See *Bowles*, 121 Wn.2d at 72-73  
(approving multiplier of three where plaintiff's fee request was found reasonable using



1 percentage-of-the-fund method); see *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1051, n. 6  
2 (9th Cir. 2002) (finding that in approximately 83% of cases surveyed by the court, the  
3 multiplier was between 1.0 and 4.0 and affirming a multiplier of 3.65); *McIntosh v. McAfee,*  
4 *Inc.*, No. 06-cv-7694, 2009 WL 673976, at \*2 (N.D. Cal. 2009) (recognizing a range from “2 to  
5 4 or even higher”); *Van Vranken v. Atlantic Richfield Co.*, 901 F. Supp. 294, 298 (N.D. Cal.  
6 1995) (“[m]ultipliers in the 3-4 range are common”).

7 11. Class Counsel assumed significant risk in this case, a factor which further  
8 justifies the requested multiplier. Class Counsel took this case on a contingency basis and have  
9 devoted nearly two years to prosecuting it with no guarantee they would ever be paid for their  
10 efforts. A review of the motions pending before this Court prior to settlement more illustrates  
11 the risk Counsel took in taking on this case. Both the delay in payment and the risk involved in  
12 this kind of case justify the multiplier requested here.

13 12. Class Counsel’s requested costs are also reasonable. Counsel submitted detailed  
14 and itemized cost records to the Court, which the Court has reviewed, and approved.

15 13. The Settlement Administrator’s fee request is also reasonable. The  
16 Administrator submitted a declaration describing the services performed in providing notice to  
17 Class Members, processing claims, and answering Class Member inquires, among other tasks.  
18 The fee charged for these services was reasonable, and is approved.

19 14. The Class Representative’s requested service payment is also reasonable.  
20 Plaintiff assisted in the investigation, litigation and settlement of this case, and a \$3500 service  
21 payment for his assistance to the Class is reasonable and appropriate.

22 **IT IS THEREFORE ORDERED, ADJUDGED AND DECREED THAT:**

23 The following payments in connection with the Settlement may be deducted from the  
24 settlement fund in accordance with the Court’s Final Approval Order and the Settlement  
25 Agreement:

1 (1) attorneys' fees to Class Counsel in the amount of \$830,000, which is one-third  
2 of the settlement fund;

3 (2) reimbursement of Class Counsel's out-of-pocket costs in the amount of  
4 \$17,780.12;

5 (3) reimbursement of the Settlement Administrator's expenses in an amount not to  
6 exceed \$179,822 to JND Administration; and

7 (4) a Class Representative Service Award of \$3,500 to Plaintiff Julius Terrell.

8 IT IS HEREBY ORDERED.

9 DATED this 19<sup>th</sup> day of June, 2018.



11  
12 HONORABLE MARY E. ROBERTS  
13 KING COUNTY SUPERIOR COURT JUDGE

14 *Presented by:*

15 TERRELL MARSHALL LAW GROUP PLLC

16 By: /s/ Beth E. Terrell, WSBA #26759

17 Beth E. Terrell, WSBA #26759  
18 Email: bterrell@terrellmarshall.com  
19 936 North 34th Street, Suite 300  
20 Seattle, Washington 98103  
21 Telephone: (206) 816-6603  
22 Facsimile: (206) 319-5450

23 E. Michelle Drake, *Admitted Pro Hac Vice*  
24 Email: emdrake@bm.net

25 Joseph Hashmall, *Admitted Pro Hac Vice*  
26 Email: jhashmall@bm.net

BERGER & MONTAGUE, P.C.  
43 SE Main Street, Suite 505  
Minneapolis, Minnesota 55414  
Telephone: (612) 594-5933  
Facsimile: (612) 584-4470

*Attorneys for Plaintiff and the Proposed Class*