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24
25 **UNITED STATES DISTRICT COURT**
26 **SOUTHERN DISTRICT OF CALIFORNIA**

27 MARLENE STEINBERG,
28
Plaintiff,

vs.

CORELOGIC CREDCO, LLC,

Defendant.

CASE NO. 3:22-cv-00498-H-SBC

**PLAINTIFF’S UNOPPOSED
MOTION & MEMORANDUM IN
SUPPORT OF MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
CLASS REPRESENTATIVE
SERVICE AWARD**

Date: February 26, 2024
Time: 10:30 a.m.
Courtroom: 12A
Judge: Marilyn L. Huff

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MOTION

Plaintiff Marlene Steinberg (“Plaintiff”) and Class Counsel respectfully move the Court to approve the following to be distributed from the Settlement Fund: (1) an award of attorneys’ fees in the amount of 25% of the Settlement Fund (\$1,423,750), (2) reimbursement of Class Counsel’s out-of-pocket documented expenses in the amount of \$16,995.49, (3) \$7,500 as a service award to Plaintiff, and (4) reimbursement to the Settlement Administrator for the costs associated with notice and claims administration, currently estimated at \$118,000.

Defendant CoreLogic Credco, LLC does not oppose the relief sought in this Motion.

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TABLE OF CONTENTS

I. BACKGROUND.....2

 A. Class Counsel’s Word to Secure Benefits for the Class.....2

 B. The Class Representative’s Participation.....3

 C. Settlement Administrator’s Expenses.....4

II. ARGUMENT.....5

 A. The Percentage of the Fund Requested is Reasonable.....6

 1. The Benefits Obtained are Significant.....7

 2. Efforts Expended by Class Counsel.....8

 3. Counsel’s Experience and Skill.....9

 4. Counsel Assumed Significant Risks in this Litigation.....10

 5. The Reaction of the Class to Date.....12

 6. A Lodestar Cross-Check Confirms the Fee is Reasonable.....12

 B. Class Counsel’s Costs Should be Reimbursed.....14

 C. The Requested Service Award is Appropriate.....15

III. CONCLUSION.....16

TABLE OF AUTHORITIES

Cases

1

2

3 *Barbosa v. Cargill Meat Solutions Corp.*, 297 F.R.D. 431 (E.D. Cal. 2013)..... 12

4 *Blount v. Host Healthcare, Inc.*, No. 21-310, 2022 WL 1094616 (S.D. Cal. April

5 12, 2022)..... 13

6 *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935 (9th Cir. 2011)..... 6, 12

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8 *Boeing Co. v. Van Gemert*, 444 U.S. 472 (1980)..... 5

9 *Bohannon v. Facebook, Inc.*, No. 12-cv-1894, 2016 WL 2962109 (N.D. Cal. May

10 23, 2016)..... 13

11 *Castillo v. Cox Commc'ns, Inc.*, No. 3:10-CV-01622-H, 2013 WL 12205193 (S.D.

12 Cal. Jan. 7, 2013)..... 6

13 *Cifuentes v. CEVA Logistics U.S., Inc.*, No. 3:16-CV-01957-H-DHB, 2017 WL

14 4792425 (S.D. Cal. Oct. 23, 2017)..... 15, 16

15 *Clark v. Trans Union, LLC*, 2017 WL 814252 (E.D. Va. Mar. 1, 2017)..... 10

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17 2014)..... 12

18 *Craft v. Cnty. of San Bernardino*, 624 F. Supp. 2d 1113 (C.D. Cal. 2008)..... 13

19 *Dalton v. Capital Associated Indus.*, 257 F.3d 409 (4th Cir. 2001)..... 11

20 *Dreher v. Experian Info. Sols., Inc.*, 2014 WL 2800766 (E.D. Va. June 19, 2014)

21 10

22 *Galloway v. Williams*, 2020 WL 7482191 (E.D. Va. Dec. 18, 2020)..... 9

23 *Gauci v. Citi Mortgage*, No. 11-cv-01387, 2011 WL 3652589 (C.D. Cal. Aug. 19,

24 2011)..... 8

25 *Graham v. DaimlerChrysler Corp.*, 101 P.3d 140 (Cal. 2004)..... 11

26 *Gutierrez-Rodriguez v. R.M. Galicia, Inc.*, No. 16-CV-00182-H-BLM, 2018 WL

27 1470198 (S.D. Cal. Mar. 26, 2018)..... 6, 15

28 *Hanlon v. Chrysler Corp.*, 150 F.3d 1011 (9th Cir. 1998)..... 5

1 *Harris v. Marhoefer*, 24 F.3d 16 (9th Cir. 1994)..... 14

2 *Hawaii v. Standard Oil Co. of Cal.*, 405 U.S. 251 (1972)..... 5

3 *Herring Networks, Inc. v. Maddow*, No. 3:19-cv-1713-BAS-AHG, 2021 WL

4 409724 (S.D. Cal. 2021)..... 13

5 *In re Immune Response Secs. Litig.*, 497 F. Supp. 2d 1166 (S.D. Cal. 2007)..... 14

6 *Kearney v. Hyundai Motor Am.*, No. 09-1298, 2013 WL 3287996 (C.D. Cal. June

7 28, 2013)..... 13

8 *Kendall v. Odonate Therapeutics, Inc.*, No. 3:20-CV-01828-H-LL, 2022 WL

9 1997530 (S.D. Cal. June 6, 2022)..... 6

10 *Laguna v. Coverall North America, Inc.*, 753 F.3d 918 (9th Cir. 2014)..... 5

11 *McIntosh v. McAfee, Inc.*, No. 06-cv-7694, 2009 WL 673976 (N.D. Cal. 2009) 14

12 *Mills v. Elec. Auto-Lite Co.*, 396 U.S. 375 (1970)..... 5

13 *Moran v. Screening Pros, LLC*, 25 F.4th 722 (9th Cir. 2022)..... 11

14 *In re Pac. Enters. Sec. Litig.*, 47 F.3d 373 (9th Cir. 1995)..... 7

15 *Perma Life Mufflers, Inc. v. In'l Parts Corp.*, 392 U.S. 134 (1968)..... 5

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17 *Ralston v. Mortg. Investors Grp., Inc.*, No. 08-cv-536, 2013 WL 5290240 (N.D.

18 Cal. Sept. 19, 2013)..... 16

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20 Nov. 13, 2006)..... 12, 16

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22 14, 16

23 *Reiter v. Sonotone Corp.*, 442 U.S. 330 (1979)..... 5

24 *Reyes v. Experian Info. Sols., Inc.*, 856 F. App'x 108 (9th Cir. 2021)..... 6, 7, 13

25 *In re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294 (3d Cir. 2005)..... 12

26 *Rodriguez v. West Pub. Corp.*, 563 F.3d 948 (9th Cir. 2009)..... 15

27 *Shannon v. Sherwood Mgmt. Co.*, No. 19-1101, 2020 WL 5891587 (S.D. Cal. Oct.

28 5, 2020)..... 6

1 *Six (6) Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301 (9th Cir. 1990) 6
 2 *Staton v. Boeing Co.*, 327 F.3d 938 (9th Cir. 2003) 5, 15
 3 *Steiner v. American Broad. Co., Inc.*, 248 Fed. Appx. 780 (9th Cir. 2007) 14
 4 *Stemple v. QC Holdings, Inc.*, No. 12-1997, 2016 WL 11783383 (S.D. Cal. Nov. 7,
 5 2016) 7
 6 *In re TFT-LCD (Flat Panel) Antitrust Litig.*, No. 07-md-1827, 2013 WL 149692
 7 (N.D. Cal. Jan. 14, 2013) 7
 8 *Thieriot v. Celtic Ins. Co.*, No. 10-cv-4462, 2011 WL 1522385 (N.D. Cal. April 21,
 9 2011) 12, 15
 10 *Trustees of Const. Indust. & Laborers Health & Welfare Trust v. Redland Ins. Co.*,
 11 460 F.3d 1253 (9th Cir. 2006) 14
 12 *Van Vranken v. Atlantic Richfield Co.*, 901 F. Supp. 294 (N.D. Cal. 1995) 14
 13 *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043 (9th Cir. 2002) 6, 7, 12, 13
 14 *In re Wash. Pub. Power Supply Sys. Sec. Litig.*, 19 F.3d 1291 (9th Cir. 1994)
 15 5, 6, 11
 16 *Williams v. Centerplate, Inc.*, No. 11-CV-2159 H-KSC, 2013 WL 4525428 (S.D.
 17 Cal. Aug. 26, 2013) 6
 18 *Wit v. United Behav. Health*, 578 F. Supp. 3d 1060 (N.D. Cal. 2022) 13
 19
 20 Rules & Statutes
 21 15 U.S.C. § 1681 *passim*
 22 Fed. R. Civ. P. 23 5
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MEMORANDUM

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2 Plaintiff Marlene Steinberg (“Plaintiff” or “Class Representative”) and Class
3 Counsel have diligently litigated this Fair Credit Reporting Act (“FCRA”) action
4 for almost two years, entirely on a contingent fee basis, with their efforts resulting
5 in an excellent settlement that establishes a common fund of \$5.695 million from
6 which all Settlement Class Members are eligible to receive an equal payment. The
7 settlement also provides for important injunctive relief directly related to the claims.
8 This favorable result and the benefits to the Settlement Class could not have been
9 attained absent Class Counsel’s time, effort, and skill, as well as Plaintiff’s active
10 participation in the case.

11 The requested attorneys’ fee of 25% of the common fund, or \$1,423,750, is
12 consistent with the benchmark in this Circuit, reasonable in light of the recovery
13 obtained and the time put into the case, and recognizes the substantial efforts
14 undertaken in litigation, discovery, and settlement negotiations. Additionally,
15 Class Counsel seek reimbursement of their out-of-pocket costs, \$16,995.49. The
16 fees and costs provisions contained in the settlement were negotiated only after
17 relief for the Class was agreed upon. Class Counsel have received no payment or
18 reimbursement to date for their work. Further, the requested service award of
19 \$7,500 for Plaintiff is appropriate in light of her investment of time and energy in
20 the litigation.

21 The amount of fees and costs and service award that Plaintiff and Class
22 Counsel intended to seek were included in the Notice to the Settlement Class.
23 While the objections deadline has not yet passed, as of the date of this filing, no
24 Settlement Class Member has objected to the requested attorneys’ fees, costs, or
25 service award, or to the settlement generally. Class Counsel will file a Notice with
26 the Court after the objections deadline has passed to apprise the Court of any
27 objections.

28

1 **I. BACKGROUND**

2 The litigation history, history of settlement negotiations, and terms of the
3 settlement are set forth in detail in the Memorandum in Support of Plaintiff’s
4 Motion for Preliminary Settlement Approval (ECF No. 46) and are incorporated by
5 reference here. This Memorandum focuses on the efforts of Class Counsel and
6 Plaintiff to achieve the result in this case.

7 **A. Class Counsel’s Work to Secure Benefits for the Class**

8 Class Counsel are highly experienced FCRA practitioners who have years of
9 experience in litigating complex FCRA class actions such as this case. (*See, e.g.*,
10 ECF Nos. 46-1, 46-5.) As a result of their expertise in this area, Class Counsel were
11 able to efficiently and effectively litigate this action and had the credibility
12 necessary to negotiate an excellent settlement on behalf of the Settlement Class. As
13 noted above, Class Counsel have worked without compensation or reimbursement
14 for their time and out-of-pocket expenses incurred in furtherance of this litigation
15 and settlement. (Declaration of E. Michelle Drake (“Drake Decl.”) ¶ 3.) Before
16 taking the case, Class Counsel negotiated a customary contingency fee agreement
17 with the Plaintiff, with the understanding that the amount would be an appropriate
18 incentive for Class Counsel to take on the financial risks involved in the
19 representation. (*Id.*) Class Counsel also agreed to advance all costs. (*Id.*) In the
20 event that Class Counsel did not successfully resolve this matter, they would have
21 been paid nothing.

22 Although the parties settled this case pre-trial, Class Counsel have invested
23 a substantial amount of resources in investigation, discovery, litigation, and
24 settlement of the matter. Many of the tasks performed by Class Counsel are not
25 evident based solely on a review of the docket, as much of the litigation took place
26 outside of the courtroom.

27 Prior to reaching the settlement in this matter, Class Counsel: (1) investigated
28 the claims, drafted and filed the class action complaint, (2) propounded and

1 responded to written discovery requests, (3) reviewed and analyzed document and
2 data productions from Defendant, including voluminous documents regarding
3 Defendant's policies, procedures and practices, and data regarding tens of
4 thousands of consumer reports, which helped clarify the scope of the Class, and
5 which included retaining an expert to assist, (4) negotiated the production of
6 complex key data sets by the Defendant, (5) pursued third party discovery with one
7 of Defendant's data vendors, (6) prepared for and attended Early Neutral Evaluation
8 with Judge Schopler, (7) prepared for and attended mediation with third party
9 neutral Rodney Max, including the preparation of a detailed mediation statement,
10 (8) continued arms-length negotiations, working to finalize a terms sheet, and
11 ultimately drafting the Settlement Agreement, (9) prepared the draft class notice
12 plan, vetting settlement administration proposals, and working with Defendant on
13 the data required for the Class List, (10) drafted the motion for preliminary
14 settlement approval, and (11) responded to class member questions and concerns.
15 (Drake Decl. ¶¶ 4-5.) Class Counsel will continue efforts through the final approval
16 hearing, including responding to settlement-related inquiries, monitoring the
17 settlement administration process, and preparation for the final approval hearing.
18 (*Id.* ¶ 6.)

19 To date, Class Counsel have incurred \$16,995.49 in out-of-pocket costs.
20 (Drake Decl. ¶ 7; Kelly Decl. ¶ 22.) All of these costs, the bulk of which were for
21 mediation, were necessarily incurred and are of the type typically reimbursed by
22 paying clients.

23 Notice was distributed to the Settlement Class on November 6, 2023, and the
24 objections deadline is January 5, 2024. As of today, zero objections have been
25 received. (Drake Decl. ¶ 8.)

26 **B. The Class Representative's Participation**

27 Plaintiff has played a valuable role in bringing this action to a successful
28 resolution. Among other things, the Class Representative (1) provided information

1 for the complaint and reviewed the pleading prior to filing, (2) responded to written
2 discovery requests and provided documents for production, (3) consulted with
3 Counsel throughout litigation and settlement, and (4) reviewed and approved the
4 Settlement Agreement. (Kelly Decl. ¶¶ 26-28.) Specifically with respect to
5 discovery, Plaintiff responded substantively to Requests for Production, Requests
6 for Admission and Interrogatories, and produced over 500 pages of documents.
7 These documents and responses included sensitive information about Plaintiff's
8 personal finances, including credit reports, mortgage statements and similar
9 documents.

10 In sum, Plaintiff played an active role in this matter and has regularly
11 communicated with Class Counsel to stay abreast of developments in the case. The
12 settlement's allowance of a service award of \$7,500 reflects her initiative in
13 pursuing this action and her time invested.

14 **C. Settlement Administrator's Expenses**

15 The parties have agreed that the Settlement Administrator's expenses for its
16 work in preparing and distributing notice to the Settlement Class, securing and
17 maintaining the Settlement Website and phone support, vetting of Claim Forms,
18 eventual preparation and distribution of settlement payments, and other
19 administrative tasks should be deducted from the common fund as well, subject to
20 Court approval. (Sett. Agree. ¶ 5.1.) These expenses are currently estimated to be
21 \$118,000, through the remainder of administration.¹ The contemplated deduction
22 of these expenses from the fund was included in Notice to the Settlement Class, and
23 no objections have been received.

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26 ¹ This amount is marginally higher than the amount quoted in the preliminary
27 approval papers because the parties opted for a more robust reminder notice to
28 ensure class members had the opportunity to file claims in advance of the
deadline.

1 **II. ARGUMENT**

2 It is well-settled that “a lawyer who recovers a common fund for the benefit
3 of persons other than himself or his client is entitled to a reasonable attorney’s fee
4 from the fund as a whole.” *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980);
5 *see also Mills v. Elec. Auto-Lite Co.*, 396 U.S. 375, 393 (1970). “[T]hose who
6 benefit from the creation of the fund should share the wealth with the lawyers whose
7 skill and effort helped create it.” *In re Wash. Pub. Power Supply Sys. Sec. Litig.*,
8 19 F.3d 1291, 1300 (9th Cir. 1994). This principle is particularly important in
9 complex litigation, where private enforcement is a necessary component of legal
10 compliance. *See, e.g., Pillsbury Co. v. Conboy*, 459 U.S. 248, 262-3 (1983); *Reiter*
11 *v. Sonotone Corp.*, 442 U.S. 330, 331 (1979); *Hawaii v. Standard Oil Co. of Cal.*,
12 405 U.S. 251, 266 (1972); *Perma Life Mufflers, Inc. v. In’l Parts Corp.*, 392 U.S.
13 134, 139 (1968). Fee awards in successful cases, such as this one, encourage class
14 actions, and thereby promote private enforcement and compliance with federal
15 consumer protection laws, such as the FCRA.

16 Courts have encouraged litigants to resolve fee issues by agreement. *See*
17 *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1029 (9th Cir. 1998). Federal Rule of
18 Civil Procedure 23(h) expressly states that “the court may award reasonable
19 attorney’s fees and nontaxable costs that are authorized by law or by the parties’
20 agreement.” Further, the Ninth Circuit has held that “the court need not inquire into
21 the reasonableness of the fees even at the high end with precisely the same level of
22 scrutiny as when the fee amount is litigated.” *Staton v. Boeing Co.*, 327 F.3d 938,
23 966 (9th Cir. 2003). This Circuit recognizes that “the parties are compromising
24 precisely to avoid litigation.” *Laguna v. Coverall North America, Inc.*, 753 F.3d
25 918, 922 (9th Cir. 2014), *vacated on other grounds*, 772 F.3d 608 (9th Cir. 2014).

26 Here, the parties’ Settlement Agreement, which was negotiated under
27 adversarial and non-collusive circumstances, allows Counsel to petition for a
28 reasonable award of attorneys’ fees of up to 25% of the Settlement Fund and

1 reimbursement of out-of-pocket costs, and the requested fees and costs should be
2 approved.

3 **A. The Percentage of the Fund Requested is Reasonable**

4 The Ninth Circuit has approved two methods of assigning attorneys' fees in
5 common fund cases: the "percentage of the fund" method and the "lodestar"
6 method. *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1047 (9th Cir. 2002) (citing
7 *In re. Wash. Pub. Power Supply*, 19 F.3d at 1295-96). Under the percentage
8 method, the court may award class counsel a percentage of the common fund
9 recovered for the class. *Id.* The percentage method is particularly appropriate in
10 common fund cases, because "the benefit to the class is easily quantified." *In re*
11 *Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 942 (9th Cir. 2011). The Ninth
12 Circuit's approved "benchmark" percentage is exactly what Class Counsel is
13 requesting here – 25%. *Id.* (quoting *Six (6) Mexican Workers v. Ariz. Citrus*
14 *Growers*, 904 F.2d 1301, 1311 (9th Cir. 1990)); *Reyes v. Experian Info. Sols., Inc.*,
15 856 F. App'x 108, 110 (9th Cir. 2021); *Gutierrez-Rodriguez v. R.M. Galicia, Inc.*,
16 No. 16-CV-00182-H-BLM, 2018 WL 1470198, at *6 (S.D. Cal. Mar. 26, 2018) ("It
17 is well established that 25% of the gross settlement amount is the benchmark in the
18 Ninth Circuit for attorneys' fees awarded under the percentage method") (Huff, J.);
19 *Castillo v. Cox Commc'ns, Inc.*, No. 3:10-CV-01622-H, 2013 WL 12205193, at *6
20 (S.D. Cal. Jan. 7, 2013) (approving 25% fee) (Huff, J.).

21 Courts in this Circuit often award even more than the benchmark percentage,
22 which weighs in favor of Class Counsel's request here. *See Shannon v. Sherwood*
23 *Mgmt. Co.*, No. 19-1101, 2020 WL 5891587, **2-3 (S.D. Cal. Oct. 5, 2020) (noting
24 "25% benchmark rate" was a "starting point," analyzing *Vizcaino* factors, and
25 awarding 30% in fees); *Kendall v. Odonate Therapeutics, Inc.*, No. 3:20-CV-
26 01828-H-LL, 2022 WL 1997530, at *6 (S.D. Cal. June 6, 2022) (awarding 33% in
27 fees) (Huff, J.); *Williams v. Centerplate, Inc.*, No. 11-CV-2159 H-KSC, 2013 WL
28 4525428, at *7 (S.D. Cal. Aug. 26, 2013) (approving 30% fee) (Huff, J.); *Stemple*

1 *v. QC Holdings, Inc.*, No. 12-1997, 2016 WL 11783383, *3 (S.D. Cal. Nov. 7,
 2 2016) (granting requested 30% in attorneys’ fees, where while “[t]his percentage is
 3 higher than the 25% benchmark for a reasonable fee award, [] it is within 20-30%,
 4 which is the usual range.”) (internal quotation omitted); *In re Pac. Enters. Sec.*
 5 *Litig.*, 47 F.3d 373, 379 (9th Cir. 1995) (affirming fee award equal to 33% of fund);
 6 *In re TFT-LCD (Flat Panel) Antitrust Litig.*, No. 07-md-1827, 2013 WL 149692
 7 (N.D. Cal. Jan. 14, 2013) (30%).

8 Further, the Ninth Circuit recently reversed a decision departing downward
 9 from the 25% benchmark in a FCRA class settlement, holding that lower “fee award
 10 falls below the market rate fee award in FCRA class action settlements.” *Reyes v.*
 11 *Experian Info. Sols., Inc.*, 856 F. App’x 108, 111 (9th Cir. 2021).

12 When analyzing a fee request under the percentage method, courts in this
 13 Circuit look at: (1) the result obtained; (2) the effort expended by counsel; (3)
 14 counsel’s experience; (4) counsel’s skill; (5) the complexity of the issues; (6) the
 15 risks of non-payment assumed by counsel; (7) the reaction of the class; (8) non-
 16 monetary benefits; and (9) comparison with counsel’s lodestar. *See Vizcaino*, 290
 17 F.3d at 1048-50. Applied here, all of these factors support Class Counsel’s request
 18 for 25% of the Settlement Fund.

19 **1. The Benefits Obtained are Significant.**

20 Plaintiff and Class Counsel achieved a noteworthy result in this matter,
 21 especially in light of the relatively small individual amounts at issues (the FCRA
 22 provides for statutory damages of \$100 - \$1,000). The monetary relief achieved for
 23 the Settlement Class will result in actual payments of roughly \$600 to each
 24 participating class member, assuming a 10% claims rate for the Claim Fund group,
 25 and that all requested deductions from the Fund are granted. Further, the settlement
 26 provides substantive non-monetary relief that directly addresses the claims at issue
 27 in the case. Given that there is a disagreement about whether injunctive relief is
 28 even available to private plaintiffs under the FCRA, the presence of non-monetary

1 relief in particular is impressive. *See Gauci v. Citi Mortgage*, No. 11-cv-01387,
2 2011 WL 3652589, at *3 (C.D. Cal. Aug. 19, 2011) (“District courts in the Ninth
3 Circuit agree that a private party may not obtain injunctive relief under the
4 FCRA.”).

5 On a per-class member basis, the anticipated recovery is considerably higher
6 than recoveries in other similar settlements for claims for inaccurate reporting. *See,*
7 *e.g., Pang v. Credit Plus*, No. 1:21-cv-00122, ECF No. 61 (D. Md. 2021) (final
8 approval of settlement regarding deceased reporting where class members needed
9 to file claim to recover; recovering class members received roughly \$430); *Roe v.*
10 *IntelliCorp Records, Inc.*, No. 12-2288, ECF No. 139 (N.D. Ohio June 5, 2014)
11 (final approval of settlement of inaccurate reporting, and other FCRA claims,
12 providing for \$50-\$270 net per class member); *Ryals v. HireRight Sols. Inc.*, No.
13 09-625, ECF No. 127 (E.D. Va. Dec. 22, 2011) (final approval of settlement
14 involving §1681e(b) claims, providing \$15-\$200 *gross* per class member recovery);
15 *Ori v. Fifth Third Bank, Fiserv, Inc.*, No. 08-432, ECF No. 217 (E.D. Wis. Jan. 10,
16 2012) (final approval of settlement of inaccurate mortgage loan reporting, claims-
17 made, each claimant receiving approximately \$55); *Speers v. Pre-Employ.com,*
18 *Inc.*, No. 13-1849, ECF No. 83 (D. Or. Feb. 10, 2016) (final approval of settlement
19 of failure to maintain strict procedures when reporting adverse public record
20 information, resulting in approximately \$153 net per class member); *Villaflor v.*
21 *Equifax Info. Servc. LLC*, No. 09-329, ECF No. 177 (N.D. Cal. May 3, 2011) (final
22 approval of settlement of §1681e(b) claims, providing credit monitoring for class
23 members with a retail value of \$155).

24 Accordingly, these factors weigh in favor of granting the requested fee
25 award.

26 **2. Efforts Expended by Class Counsel**

27 This action was vigorously investigated, litigated, and negotiated by both
28 sides before the parties settled. As described above, the parties engaged in diligent

1 pre-suit investigation, formal and informal discovery, and informed settlement
2 negotiations. Further, Class Counsel methodically reviewed the documents and
3 voluminous data produced in this litigation to ensure that they fully understood the
4 practices at issue and the best way to define the Class here. (Drake Decl. ¶¶ 4-5.)

5 Given the time and resources devoted to investigating, litigating, and settling
6 this action, as well as the continuing work to be done by Class Counsel, this factor
7 weighs in favor of the requested award.

8 **3. Counsel’s Experience and Skill**

9 Class Counsel are highly experienced in complex class action litigation and
10 consumer litigation in general. (*See* ECF No. 46-1.) Berger Montague PC was
11 founded in 1970, and has been concentrated on representing plaintiffs in complex
12 class actions ever since. (ECF No. 46-3.) The firm has been recognized by courts
13 for its skill and experience in handling major complex litigation. (*Id.*) Berger has
14 been recognized by The National Law Journal for its “Hot List” of top plaintiffs’
15 oriented litigation firms in the nation. (*Id.*) Lead counsel from Berger, E. Michelle
16 Drake is the co-chair of the firm’s Consumer Protection, Fair Debt and Fair Credit,
17 and Technology, Privacy & Data Breach practice groups. (ECF No. 46-4.) Her
18 practice focuses on protecting consumers’ rights when they are harmed by improper
19 credit reporting, and other illegal business practices. (*Id.*) She currently serves as
20 lead or co-lead counsel in dozens of class action consumer protection cases in
21 federal and state courts across the country, including numerous cases brought
22 pursuant to the FCRA. (*Id.*) She frequently speaks on FCRA issues and has
23 authored a book chapter on background checks. (*Id.*) Joseph C. Hashmall, also
24 from Berger, has concentrated his practice on FCRA litigation as well. Both are
25 counsel of record in many active FCRA cases throughout the country. Class
26 Counsel from Kelly Guzzo, PLC are similarly experienced. Courts have repeatedly
27 found them to be qualified, experienced, and adequate under Rule 23. *See, e.g.,*
28 *Galloway v. Williams*, 2020 WL 7482191, at *8 (E.D. Va. Dec. 18, 2020) (“Class

1 Counsel and their firms have extensive backgrounds in complex and class action
 2 litigation and consumer protection litigation. And, in particular, members of Class
 3 Counsel have significant experience in litigating class action lawsuits”); *Heath*
 4 *v. Trans Union*, No. 3:18-cv-720, ECF No. 60 at 9:7–9 (E.D. Va. Aug. 6, 2019)
 5 (“Class counsel is qualified and more than able to handle this. Their reputation in
 6 this district, and I am sure in others, are sterling.”); *Clark v. Trans Union, LLC*,
 7 2017 WL 814252, at *13 (E.D. Va. Mar. 1, 2017) (“This Court echoes the
 8 sentiments previously stated about Clark’s counsel because they pertain here with
 9 equal vigor.”); *Campos-Carranza v. Credit Plus, Inc.*, No. 1:16-cv-120, ECF No.
 10 80 at 5:3–7 (E.D. Va. Feb. 17, 2017) (“I think this is an extremely, as I say,
 11 extremely fair, reasonable, and adequate settlement.”); *Dreher v. Experian Info.*
 12 *Sols., Inc.*, 2014 WL 2800766, at *2 (E.D. Va. June 19, 2014) (“Dreher’s counsel
 13 is well-experienced in the arena of FCRA class action litigation.”); *Burke v. Seterus,*
 14 *Inc.*, No. 3:16-cv-785, ECF No. 41 at 9:19–22 (E.D. Va. 2017) (“Experience of
 15 counsel on both sides in this case is extraordinary. Ms. Kelly and Ms. Nash and
 16 their colleagues are here in this court all the time with these kinds of cases and do
 17 a good job on them.”); *see also* Kelly Decl. ¶ 8.

18 Class Counsel’s substantial litigation skills were necessary to bring this
 19 action to a successful conclusion, and in a timely manner. Counsel thoroughly
 20 investigated and vetted the potential claims, analyzed documents and data and used
 21 them to Plaintiff’s advantage at settlement negotiations, and ultimately settled this
 22 matter on terms that are highly favorable to the Settlement Class.

23 **4. Counsel Assumed Significant Risks in this Litigation**

24 The requested fee award is even more reasonable considering the complexity
 25 of the litigation, and the risks that Class Counsel assumed in undertaking the
 26 representation on a contingent fee basis. Class action litigation is inherently
 27 complicated and time-consuming. On top of the demands that come with this type
 28 of litigation, Class Counsel also had to be prepared to make this investment with

1 the very real possibility of an unsuccessful outcome and no fee recovery of any
2 kind.

3 The FCRA is not a strict liability statute. *Dalton v. Capital Associated*
4 *Indus.*, 257 F.3d 409, 417 (4th Cir. 2001). A FCRA plaintiff can recover only where
5 the defendant has acted negligently or willfully, and where the defendant’s violation
6 was at most negligent, recovery is limited to actual damages. *See* 15 U.S.C. §§
7 1681n(a)(1), 1681o(a)(1). Plaintiff would have had to prove not only that
8 Defendant violated the FCRA, but that it did so willfully, in order to recover
9 statutory damages. Throughout this litigation, Defendant has vigorously contested
10 that it willfully violated the FCRA, arguing that as a reseller, it was reasonable for
11 it to rely upon information reported by other consumer reporting agencies, who,
12 Defendant argued, were following their own reasonable procedures. Notably, the
13 Ninth Circuit has recently made clear the importance of willfulness in FCRA
14 litigation, affirming a grant of summary judgment on that issue. *Moran v.*
15 *Screening Pros, LLC*, 25 F.4th 722, 730 (9th Cir. 2022). Plaintiff believes that these
16 arguments could have been overcome in litigation, but also believes they
17 demonstrate that there were serious obstacles to recovery in this case.

18 The Ninth Circuit has recognized the importance of rewarding attorneys who
19 take cases on a contingency basis. *In re Wash. Pub. Power Supply*, 19 F.3d at 1299
20 (“[c]ontingent fees that may far exceed the market value of the services if rendered
21 on a non-contingent basis are accepted in the legal profession as a legitimate way
22 of assuring competent representation for plaintiffs who could not afford to pay on
23 an hourly basis regardless whether they win or lose.”); *see also Graham v.*
24 *DaimlerChrysler Corp.*, 101 P.3d 140, 157 (Cal. 2004) (“[a] contingent fee must
25 be higher than a fee for the same legal services paid as they are performed. The
26 contingent fee compensates the lawyer not only for the legal services he renders but
27 for the loan of those services.”) (internal citations omitted).

28 Thus, the complexity and risks involved in this matter weigh in favor of Class

1 Counsel’s requested fees.

2 **5. The Reaction of the Class to Date**

3 Notice of the settlement, including the proposed amounts to be requested in
4 fees, costs, and service award, was sent on November 6, 2023 to the Settlement
5 Class. Not a single class member has filed an objection to the contemplated fee
6 request to date or the settlement generally, and none have opted-out. This factor
7 supports the requested award. *Barbosa v. Cargill Meat Solutions Corp.*, 297 F.R.D.
8 431, 448 (E.D. Cal. 2013) (finding only one opt-out and zero objections from 1,837
9 class members favored awarding 33% of the common fund); *Razilov v. Nationwide*
10 *Mut. Ins. Co.*, No. 01-cv-1466, 2006 WL 3312024, at *3 (D. Or. Nov. 13, 2006)
11 (finding 27 opt-outs out of 60,000 class members weighed in favor of granting fee
12 award in excess of 25% benchmark); *Thieriot v. Celtic Ins. Co.*, No. 10-cv-4462,
13 2011 WL 1522385, at *6 (N.D. Cal. April 21, 2011) (“[t]he fact that no members
14 of the 390-person class objected to the proposed 33% fee award – which was also
15 communication in the notice – supports an increase in the benchmark rate.”).

16 **6. A Lodestar Cross-Check Confirms the Fee is Reasonable**

17 A comparison with Class Counsel’s lodestar further demonstrates that the
18 requested fee is appropriate. *See Vizcaino*, 290 F.3d at 1050 (“the lodestar
19 calculation can be helpful in suggesting a higher percentage when litigation has
20 been protracted”). The “cross-check calculation need entail neither mathematical
21 precision nor bean counting . . . [courts] may rely on summaries submitted by the
22 attorneys and need not review actual billing records.” *Covillo v. Specialty’s Café*,
23 No. 11-cv-594, 2014 WL 954516, at *21-22 (N.D. Cal. Mar. 6, 2014) (quoting *In*
24 *re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294, 306-7 (3d Cir. 2005)).

25 The lodestar method is calculated by multiplying “the number of hours . . .
26 reasonably expended on the litigation . . . by a reasonable hourly rate.” *In re*
27 *Bluetooth Headset*, 654 F.3d at 941. In considering rates, courts examine the rate
28 “prevailing in the community for similar services by lawyers of reasonably

1 comparable skill, experience, and reputation.” *Blum v. Stenson*, 465 U.S. 886, 895
2 n.11 (1984).

3 Here, Class Counsel’s hourly rates, which range from \$225 to \$980, are
4 comparable to those approved in California. *Blount v. Host Healthcare, Inc.*, No.
5 21-310, 2022 WL 1094616, *9 (S.D. Cal. April 12, 2022) (“Recently, courts in this
6 District have awarded hourly rates for work performed in civil cases by attorneys
7 with significant experience anywhere in range of \$550 per hour to more than \$1000
8 per hour.”) (collecting cases); *Herring Networks, Inc. v. Maddow*, No. 3:19-cv-
9 1713-BAS-AHG, 2021 WL 409724, at *7, (S.D. Cal. 2021) (finding \$1150-\$1050
10 to be reasonable rates for partners from a top firm); *Wit v. United Behav. Health*,
11 578 F. Supp. 3d 1060, 1078-9 (N.D. Cal. 2022) (approving attorney hourly rates of
12 \$1,040 (24 years of experience) to \$595 (6 years)); *Bohannon v. Facebook, Inc.*,
13 No. 12-cv-1894, 2016 WL 2962109, at *5-6 (N.D. Cal. May 23, 2016) (approving
14 attorney hourly rates of \$525-800); *Kearney v. Hyundai Motor Am.*, No. 09-1298,
15 2013 WL 3287996, *8 (C.D. Cal. June 28, 2013) (approving hourly rates between
16 \$650 and \$800 for class counsel in a consumer class action).

17 To date, Class Counsel have devoted over 931 hours to this matter, resulting
18 in \$552,303 in lodestar. (Drake Decl. ¶ 9; Kelly Decl. ¶ 20.) This does not include
19 the time that will be spent on the continuing efforts referenced above in connection
20 with overseeing settlement administration and responding to class member
21 inquiries. The lodestar cross-check of the percentage requested thus results in a
22 multiplier of 2.58. Multipliers of 1 to 4 are commonly awarded in complex class
23 action cases in this Circuit. *See Vizcaino*, 290 F.3d at 1051, n. 6 (finding that in
24 approximately 83% of cases surveyed by the court, the multiplier was between 1.0
25 and 4.0 and affirming a multiplier of 3.65); *Reyes*, 856 F. App’x at 111 (reversing
26 district court that awarded less than 25% in FCRA class action, when “[a]ssuming
27 a 25% award, the lodestar crosscheck returns a multiplier of 2.88.”); *Craft v. Cnty.*
28 *of San Bernardino*, 624 F. Supp. 2d 1113, 1125 (C.D. Cal. 2008) (approving fee

1 award with a 5.2 multiplier, finding that “there is ample authority for such awards
 2 resulting in multipliers in this range or higher,” and collecting cases nationwide in
 3 support); *Reed v. 1-800 Contacts, Inc.*, No. 12-2359, 2014 WL 29011, *9 (S.D. Cal.
 4 Jan. 2, 2014) (approving fee award with a 2.9 multiplier, and stating that “the Ninth
 5 Circuit frequently approves even higher multipliers than this one.”); *McIntosh v.*
 6 *McAfee, Inc.*, No. 06-cv-7694, 2009 WL 673976, at *2 (N.D. Cal. 2009)
 7 (recognizing a range from “2 to 4 or even higher”); *Van Vranken v. Atlantic*
 8 *Richfield Co.*, 901 F. Supp. 294, 298 (N.D. Cal. 1995) (“[m]ultipliers in the 3-4
 9 range are common”); *Steiner v. American Broad. Co., Inc.*, 248 Fed. Appx. 780,
 10 783 (9th Cir. 2007) (affirming multiplier of 3.65). Even without the future time to
 11 be expended by Class Counsel accounted for yet, the lodestar cross-check confirms
 12 the reasonableness of the requested fee award.

13 **B. Class Counsel’s Costs Should be Reimbursed**

14 Class Counsel also seek, pursuant to the Settlement Agreement,
 15 reimbursement of documented, out-of-pocket, expenses incurred in litigating and
 16 settling this matter. *See Harris v. Marhoefer*, 24 F.3d 16, 19 (9th Cir. 1994)
 17 (counsel should recover “those out-of-pocket expenses that would normally be
 18 charged to a fee paying client”) (internal citations omitted); *see also Trustees of*
 19 *Const. Indust. & Laborers Health & Welfare Trust v. Redland Ins. Co.*, 460 F.3d
 20 1253, 1258-59 (9th Cir. 2006) (legal research costs reimbursable); *In re Immune*
 21 *Response Secs. Litig.*, 497 F. Supp. 2d 1166, 1177-8 (S.D. Cal. 2007) (mediation
 22 expenses, expert fees, legal research, copies, postage, filing fees, messenger, and
 23 federal express costs reimbursable); *Marhoefer*, 24 F.3d at 19 (postage costs
 24 reimbursable).

25 All of the costs incurred were reasonable and necessary to the successful
 26 conclusion of this litigation. (*See Drake Decl.* ¶ 7; *Kelly Decl.* ¶ 22.) These costs
 27 include: filing fees, legal research, service of process, and mediation expenses.
 28 These types of expenses are routinely reimbursed by the courts as noted above, thus

1 Counsel’s requested costs of \$16,995.49 should be awarded.

2 Further, the Settlement Administrator’s expenses, currently estimated to be
3 \$118,000 through the remainder of administration, are reasonably incurred, are in
4 accordance with the Settlement Agreement, and should be approved for
5 reimbursement from the common fund.

6 **C. The Requested Service Award is Appropriate**

7 The Ninth Circuit has recognized that named plaintiffs are eligible for
8 reasonable service awards. *Rodriguez v. West Pub. Corp.*, 563 F.3d 948, 958 (9th
9 Cir. 2009) (service awards “are fairly typical in class action cases.”). Such awards
10 are intended to compensate class representatives for work done on behalf of the
11 class, to make up for financial or reputational risk undertaken in bringing the action,
12 and to recognize their willingness to act as private attorneys general. *Id.* at 958-59.

13 In evaluating requests for service awards, the court should consider “relevant
14 factors including ‘the actions the plaintiff has taken to protect the interests of the
15 class, the degree to which the class has benefitted from those actions, . . . [and] the
16 amount of time and effort the plaintiff expended in pursuing the litigation.”
17 *Thieriot*, 2011 WL 1522385 at *7 (quoting *Staton*, 327 F.3d at 977). Here, all of
18 these factors support the requested award. Plaintiff has expended time and effort
19 in this matter, consistently putting the class members’ interests first. Plaintiff
20 stayed abreast of developments in the case, provided documents and written
21 responses in the discovery process, reviewed relevant pleadings, and evaluated the
22 Settlement Agreement. As a result of Plaintiff’s efforts, and her willingness to
23 pursue this action, substantial benefits have been achieved on behalf of the
24 Settlement Class.

25 Moreover, the requested service payment of \$7,500 has received no
26 objections and is relatively modest compared to awards granted in other complex
27 litigation in this Circuit. *See, e.g., Gutierrez-Rodriguez v. R.M. Galicia, Inc.*, No.
28 16-CV-00182-H-BLM, 2018 WL 1470198, at *7 (S.D. Cal. Mar. 26, 2018)

1 (approving \$7,500 service payment) (Huff, J.); *Cifuentes v. CEVA Logistics U.S.,*
2 *Inc.*, No. 3:16-CV-01957-H-DHB, 2017 WL 4792425, at *2 (S.D. Cal. Oct. 23,
3 2017) (approving \$7,500 service payment) (Huff, J.); *Razilov*, 2006 WL 3312024
4 at *2-4 (approving incentive award of \$10,000); *Reed*, 2014 WL 29011, *10
5 (approving service award of \$10,000); *Ralston v. Mortg. Investors Grp., Inc.*, No.
6 08-cv-536, 2013 WL 5290240, at *5 (N.D. Cal. Sept. 19, 2013) (approving service
7 payment of \$12,500).

8 Accordingly, the service award is fully justified, reasonable, and should be
9 awarded.

10 **III. CONCLUSION**

11 Based on the foregoing, Plaintiff respectfully requests that the Court grant
12 the following to be distributed from the fund: Class Counsel’s requests of 25% of
13 the Settlement Fund as attorneys’ fees and \$16,995.49 as reimbursement for out-
14 of-pocket costs, \$7,500 as a service award to the Plaintiff, and reimbursement of
15 settlement administration expenses.

16
17 Dated: December 15, 2023

Respectfully submitted,

BERGER MONTAGUE PC

By: /s/E. Michelle Drake
E. Michelle Drake, *pro hac vice*
Joseph C. Hashmall, *pro hac vice*
Attorneys for Plaintiff

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

MARLENE STEINBERG,

Plaintiff,

vs.

CORELOGIC CREDCO, LLC,

Defendant.

Case No. 3:22-cv-00498-H-SBC

**DECLARATION OF E. MICHELLE
DRAKE IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES, COSTS,
CLASS REPRESENTATIVE
AWARD**

Judge: Hon. Marilyn L. Huff
Hearing Date: February 26, 2024
Time: 10:30 a.m.
Courtroom: 12A

1 I, E. Michelle Drake, declare as follows:

2 1. I am one of Plaintiff’s Counsel in the above-captioned matter.

3 2. I submit this Declaration in support of the Motion for Attorneys’ Fees,
4 Costs, and Class Representative Service Award.

5 3. Before taking the case, Class Counsel negotiated a customary
6 contingency fee agreement with the Plaintiff, with the understanding that the amount
7 would be an appropriate incentive for Class Counsel to take on the financial risks
8 involved in the representation. Class Counsel also agreed to advance all costs. Class
9 Counsel have thus worked without compensation or reimbursement for their time and
10 out-of-pocket expenses incurred in furtherance of this litigation and settlement.

11 4. Prior to reaching the settlement in this matter, Class Counsel: (1)
12 investigated the claims, drafted and filed the class action complaint, (2) propounded
13 and responded to written discovery requests, (3) reviewed and analyzed document
14 and data productions from Defendant, including voluminous documents regarding
15 Defendant’s policies, procedures and practices, and data regarding tens of thousands
16 of consumer reports, which helped clarify the scope of the Class, and which included
17 retaining an expert to assist, (4) negotiated the production of complex key data sets
18 by the Defendant, and (5) pursued third party discovery with one of Defendant’s data
19 vendors,

20 5. In furtherance of the ultimate resolution of this matter, Class Counsel
21 expended time as it (1) prepared for and attended Early Neutral Evaluation with Judge
22 Schopler, (2) prepared for and attended mediation with third party neutral Rodney
23 Max, including the preparation of a detailed mediation statement, (3) continued arms-
24 length negotiations, working to finalize a terms sheet, and ultimately drafting the
25 Settlement Agreement, (4) prepared the draft class notice plan, vetting settlement
26 administration proposals, and working with Defendant on the data required for the
27 Class List, (5) drafted the motion for preliminary settlement approval, and (6)
28 responded to class member questions and concerns.

1 6. Class Counsel will continue efforts through the final approval hearing,
2 including responding to settlement-related inquiries, monitoring the settlement
3 administration process, and preparation for the final approval hearing.

4 7. To date, Berger Montague has incurred \$9,148.96 in costs. A table
5 summarizing the categories of those costs is below:

Expense Category	Total
Mediation Fees	\$5,412.5
Filing & Misc. Fees	\$1,953.26
Computer Research	\$600.43
E-Discovery Project Management	\$416.32
Travel	\$398.9
E-Discovery Hosting	\$124.06
Process Server	\$105
Delivery & freight	\$61.57
Printing and Copying	\$59.48
Postage	\$10
Docusign	\$7.44
Total	\$9,148.96

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16 8. The contemplated requests for attorneys' fees, costs, Class
17 Representative Service Award and administration expenses were included in the
18 Notices to the Settlement Class. No objections have been received to date.

19 9. To date, Berger Montague PC has expended 546 hours in litigation on
20 this matter, resulting in \$380,695.50 in lodestar. A summary table of timekeepers on
21 this matter is below, and the underlying line entries are attached as **Exhibit A** with
22 redactions for privilege.
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Timekeeper	Position	Atty. Yrs. of Experience	Hourly Rate	Hours Worked	Lodestar
Drake, Eleanor Michelle	Executive Shareholder	22	\$980	86.9	\$85,162
Parker, Phyllis	Counsel	27	\$740	110.5	\$81,770
Albanese, John	Shareholder	11	\$720	1.4	\$1,008
Cavanaugh, James	Counsel	35	\$695	111.4	\$77,423
Hashmall, Joseph	Senior Counsel	14	\$645	162.7	\$104,941.50
Rios, Sophia M	Associate	8	\$590	3.7	\$2,183
Hibray, Jean	Paralegal		\$425	61.6	\$26,180
Gionnette, Julie	Legal Assistant		\$260	7.8	\$2,028
Total				546	\$380,695.50

10. Each attorney who worked on this case has a wealth of experience:

a. E. Michelle Drake:

E. Michelle Drake is an Executive Shareholder in the Firm's Minneapolis office. Ms. Drake focuses her practice primarily on consumer protection, improper credit reporting, and financial services class actions. Ms. Drake helped achieve one of the largest class action settlements in a case involving improper mortgage servicing practices associated with force-placed insurance, resulting in a settlement valued at \$110 million for a nationwide class of borrowers who were improperly force-placed with overpriced insurance. Ms. Drake also served as liaison counsel and part of the Plaintiffs' Steering Committee on behalf of consumers harmed in the Target data breach, a case she helped successfully resolve on behalf of over ninety million consumers whose data was affected by the breach. More recently, Michelle has been successful in litigating numerous cases protecting consumers' federal privacy rights under the Fair Credit Reporting Act, securing settlements valued at over \$10 million on behalf of tens of thousands of consumers harmed by improper background checks and inaccurate credit reports in the last two

1 years alone. Ms. Drake was admitted to the bar in 2001 and has
2 since served as lead class counsel in over fifty class and
3 collective actions alleging violations of the Fair Credit Reporting
4 Act, the Fair Debt Collection Practices Act, the Fair Labor
5 Standards Act, various states' unfair and deceptive trade
6 practices acts, breach of contract and numerous other pro-
7 consumer and pro-employee causes of action. Ms. Drake serves
8 on the Board of the National Association of Consumer
9 Advocates, is a member of the Partner's Council of the National
10 Consumer Law Center, and is an At-Large Council Member for
11 the Consumer Litigation Section for the Minnesota State Bar
12 Association. She was named as a Super Lawyer in 2013-2021
13 and was named as a Rising Star prior to that. Ms. Drake was also
14 appointed to the Federal Practice Committee in 2010 by the
15 United States District Court for the District of Minnesota. She
16 has been quoted in the New York Times and the National Law
17 Journal, and her cases were named as "Lawsuits of the Year" by
18 Minnesota Law & Politics in both 2008 and 2009.

19 b. Joe Hashmall:

20 Joe Hashmall, Senior Counsel, is a member of the Firm's
21 Consumer Protection practice group. In that practice group, Mr.
22 Hashmall primarily focuses on consumer class actions
23 concerning financial and credit reporting practices. Mr.
24 Hashmall is a graduate of the Grinnell College and the Cornell
25 University School of Law. During law school, Mr. Hashmall
26 served as the Executive Editor of the Cornell Legal Information
27 Institute's Supreme Court Bulletin and as an Editor for the
28 Cornell International Law Journal. Mr. Hashmall has also
worked as a law clerk for President Judge Bonnie B. Leadbetter
of the Pennsylvania Commonwealth Court and for the Honorable
David J. Ten Eyck of the Minnesota District Court.

29 c. James Cavanaugh

30 James Cavanaugh is an experienced litigator having previously
31 established and managed for some years his own general practice
32 law firm, prior to working in antitrust matters in more recent
33 years. That law practice emphasized litigation, including
34 workers' compensation, employment law, civil rights, and
35 personal injury claims. In that practice, Mr. Cavanaugh

1 advocated for the establishment of case law precedent in *Dr. Joe*
2 *John Doe v. TRIS Mental Health Services*, 298 N.J. Super. 677
3 (1996) permitting the disabled, for the first time, to proceed
4 anonymously in the New Jersey Superior Courts. Mr.
5 Cavanaugh's experience includes investigating the facts of a
6 workplace explosion involving a faulty truck rim, coordination
7 of physical evidence, close consultation with a Drexel University
8 engineering expert, and ultimate settlement for injured plaintiff.

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d. Sophia Rios

Sophia Rios manages Berger Montague's San Diego office and practices in the Consumer Protection, Credit Reporting and Background Checks, and Antitrust practice groups. Ms. Rios advocates on behalf of a broad range of clients, including HIV Prevention patients, persons wrongly reported as possible terrorists and drug traffickers when applying for credit, persons who receive unwanted marketing text messages, and people who were overcharged on foreign transactions when using their Visa or Mastercard debit and credit cards. Before joining the Firm, Ms. Rios was an associate in the litigation department of a large international law firm. She represented corporate and individual clients in consumer protection, complex commercial litigation, securities, and Americans with Disabilities Act (ADA) matters. In her pro bono practice, Ms. Rios assisted refugees seeking asylum in the United States. Ms. Rios is committed to furthering diversity and inclusion in law firms. She serves on the Firm's Diversity, Equity & Inclusion Task Force. Sophia has also participated in the Leadership Council on Legal Diversity's Pathfinder Program. While at Stanford Law School, Ms. Rios served as an extern Legal Adviser in the Office of Commissioner Julie Brill at the Federal Trade Commission in Washington, DC. Ms. Rios co-founded the Stanford Critical Law Society, which serves as a student forum for the discussion of the relationship between law and race. Ms. Rios was a Lead Article Editor for the Stanford Environmental Law Journal.

e. Phyllis Parker

Phyllis Maza Parker, a retired Shareholder for Berger Montague, concentrated her practice primarily on complex securities class action litigation, representing both individual and institutional

1 investors. Her practice also included commercial litigation. Ms.
2 Parker served on the team as co-lead counsel for the Class in *In*
3 *re Xcel Energy, Inc. Securities Litigation* (D. Minn.). The case,
4 which settled for \$80 million, was listed among the 100 largest
5 securities class action settlements in the United States since the
6 enactment of the 1933/1934 Securities Acts. Among other cases,
7 she has also served as co-lead counsel in *In re Reliance Group*
8 *Holdings, Inc. Securities Litigation* (\$15 million settlement); *In*
9 *re The Loewen Group, Inc. Securities Litigation* (\$6 million
10 settlement); as lead counsel in *In re Veeco Instruments Inc.*
11 *Securities Litigation* (\$5.5 million settlement on the eve of trial);
12 as co-lead counsel in *In re Nuvelo, Inc. Securities Litigation*
13 (\$8.9 million settlement); and as co-lead counsel in *Coady v.*
14 *Perry, et al. (IndyMac Bancorp, Inc.)* (\$6.5 million settlement).
15 While studying for her J.D. at Temple, Ms. Parker was a member
16 of the Temple Law Review. She published a Note on the subject
17 of the Federal Sentencing Guidelines in the Temple Law Review,
18 Vol. 67, No. 4, 1994, which has been cited by a court and in a
19 law review article. After her first year of law school, Ms. Parker
20 interned with the Honorable Dolores K. Sloviter of the United
21 States Court of Appeals for the Third Circuit.

22 f. John Albanese:

23 John Albanese is a Shareholder at Berger Montague. Mr.
24 Albanese has significant experience representing individuals and
25 classes in a wide variety of areas, including litigating claims for
26 violations of the Fair Credit Reporting Act, unfair debt
27 collection, product liability, unlawful lending, unfair insurance
28 practices, data privacy violations, and mass torts. Mr. Albanese
is frequently involved in multi-district litigation and serves in a
leadership capacity. He has served as class counsel in state and
federal courts across the country. Mr. Albanese is regularly
invited to speak at conferences on cutting-edge litigation issues.
He also frequently represents consumer advocacy groups as
amici curiae at the appellate level. He is an editor of the National
Consumer Law Center's Fair Credit Reporting manual. Mr.
Albanese is a graduate of Columbia Law School and Georgetown
University. At Columbia, he was a managing editor of the
Columbia Law Review. Mr. Albanese clerked for Magistrate
Judge Geraldine Brown in the Northern District of Illinois.

1 11. Berger Montague PC’s time records are maintained in accordance with
2 industry standards to ensure reliability and transparency. The firm’s formal policy
3 requires all timekeepers—including attorneys and support staff—to keep records of
4 time worked contemporaneously and to provide sufficient detail to convey the nature
5 and merit of the work performed. To ensure each time entry contains sufficient detail,
6 Berger Montague requires time entries to include both matter numbers
7 (corresponding to the specific case) and task codes (corresponding to the type of work
8 performed). BMPC uses the widely-accepted ABA Litigation Code Set, which
9 includes 29 task codes spread across 5 stages of litigation (e.g., Pre-Trial Pleadings
10 and Motions, Discovery, etc.) to allocate time to particular tasks. This model,
11 endorsed by courts,¹ ensures that time is billed in a uniform and task-oriented
12 manner.² Timekeepers are also required to provide narrative descriptions setting
13 forth the case-specific tasks associated with each time entry.

14 12. This manner of time-keeping, with contemporaneous records and
15 detailed descriptions broken down by task, provides a level of accountability that
16 courts nationwide routinely recommend when scrutinizing applications for attorneys’
17 fees. *Deary v. City of Gloucester*, 9 F.3d. 191, 197-98 (1st Cir. 1993) (“In order to
18 recover fees, attorneys must submit a full and precise accounting of their time,
19 including specific information about number of hours, dates, and the nature of the
20 work performed.”); *Bode v. United States*, 919 F.2d 1044, 1047 (5th Cir. 1990)
21 (collecting cases) (“[C]ourts customarily require the applicant to produce
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24 ¹ See *Yahoo!, Inc. v. Net Games, Inc.*, 329 F. Supp. 2d 1179, 1189 (N.D. Cal. 2004)
25 (“The ABA template commends itself to parties applying for fee awards.”); *Albion
26 Pac. Prop. Res., LLC v. Seligman*, 329 F. Supp. 2d 1163, 1174 (N.D. Cal. 2004)
27 (same).

28 ² American Bar Association, Uniform Task-Based Management System, available at
https://www.americanbar.org/groups/litigation/resources/uniform_task_based_management_system/ (“The Litigation Code Set has formed the basis for most, if not all,
schemes to record and bill time on an hourly basis.”)

1 contemporaneous billing records or other sufficient documentation so that the district
2 court can fulfill its duty to examine the application....”).

3 I declare under penalty of perjury under the laws of the State of California
4 that the foregoing is true and correct.

5 Executed on the 15th day of December, 2023, at Minneapolis, Minnesota.

6
7 /s/E. Michelle Drake
8 E. Michelle Drake
9 *Attorney for Plaintiff*
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Exhibit A

Timekeeper	Entry Date	Hourly Rate	Hours Worked	Lodestar	Narrative	ABA Code
Hashmall, Joseph	10/4/2021	\$645.00	1.2	\$ 774.00	Review of case file, evaluation of venue options, internal emails regarding facts of case	L100
Hashmall, Joseph	10/4/2021	\$645.00	0.3	\$ 193.50	Call with Hans Lodge regarding facts of case, next steps in complaint drafting	L100
Hashmall, Joseph	10/5/2021	\$645.00	0.6	\$ 387.00	Review of case file, evaluation of venue options, internal emails regarding same	L100
Hibray, Jean	10/5/2021	\$425.00	0.2	\$ 85.00	Migrate case documents to new workspace	L140
Hashmall, Joseph	10/6/2021	\$645.00	0.2	\$ 129.00	Drafting retainer agreement, internal email regarding cocounsel agreement	L100
Hashmall, Joseph	10/7/2021	\$645.00	0.6	\$ 387.00	Call with client ██████████	L110
Hashmall, Joseph	10/7/2021	\$645.00	0.5	\$ 322.50	Internal emails regarding case opening procedures, including legal services agreement and cocounsel agreement	L100
Hashmall, Joseph	10/8/2021	\$645.00	0.2	\$ 129.00	Litigation team meeting	L100
Hashmall, Joseph	10/8/2021	\$645.00	0.5	\$ 322.50	Drafting and editing case opening documents - LSA and cocounsel agreement	L100
Hibray, Jean	10/8/2021	\$425.00	0.1	\$ 42.50	Case meeting.	L120
Hashmall, Joseph	10/11/2021	\$645.00	0.6	\$ 387.00	Internal emails regarding ██████████, review of cover letter attaching same	L120
Hibray, Jean	10/11/2021	\$425.00	0.4	\$ 170.00	Draft cover letter, finalize and prepare return envelope, send to ██████████	L140
Hashmall, Joseph	10/12/2021	\$645.00	0.6	\$ 387.00	Review of case file in advance of drafting of complaint	L120
Hashmall, Joseph	10/13/2021	\$645.00	0.3	\$ 193.50	Call with litigation team regarding plan to file complaint	L100
Hibray, Jean	10/13/2021	\$425.00	0.2	\$ 85.00	Participate in meeting with J Hashmall, M Drake, H Lodge	L140
Hashmall, Joseph	10/18/2021	\$645.00	2.2	\$ 1,419.00	Drafting complaint	L210
Hashmall, Joseph	10/19/2021	\$645.00	0.3	\$ 193.50	Review of status of draft complaint, filing plan, internal email regarding same	L210
Hashmall, Joseph	10/25/2021	\$645.00	1	\$ 645.00	Review of documents ██████████, internal emails regarding same	L100
Hibray, Jean	10/25/2021	\$425.00	0.3	\$ 127.50	Review ██████████, email J Hashmall re same.	L140
Hashmall, Joseph	10/26/2021	\$645.00	0.1	\$ 64.50	Call with Michelle Drake regarding draft complaint	L200
Drake, Eleanor Michelle	10/27/2021	\$980.00	0.5	\$ 490.00	email with JCH re logistics for filing case, filing location, and local counsel requirements	L100
Hashmall, Joseph	10/27/2021	\$645.00	0.2	\$ 129.00	Internal emails regarding plan to file case	L120
Hashmall, Joseph	10/27/2021	\$645.00	0.5	\$ 322.50	Internal emails regarding ██████████, review of documents ██████████	L120
Hashmall, Joseph	10/29/2021	\$645.00	0.4	\$ 258.00	Review of draft complaint, plan for filing case	L130
Albanese, John	11/1/2021	\$720.00	0.1	\$ 72.00	Discuss case strategy with litigation team	L100
Hashmall, Joseph	11/1/2021	\$645.00	0.1	\$ 64.50	Litigation team meeting	L120
Drake, Eleanor Michelle	11/5/2021	\$980.00	0.2	\$ 196.00	team meeting re case status and next steps to move case forward	L110
Hashmall, Joseph	11/5/2021	\$645.00	0.2	\$ 129.00	Call with cocounsel regarding filing of case	L120
Hibray, Jean	11/5/2021	\$425.00	0.2	\$ 85.00	Team meeting	L140
Hashmall, Joseph	11/10/2021	\$645.00	0.4	\$ 258.00	Internal emails regarding ██████████	L100
Hashmall, Joseph	11/12/2021	\$645.00	0.6	\$ 387.00	Further edits to draft complaint	L200
Hashmall, Joseph	11/15/2021	\$645.00	0.2	\$ 129.00	Internal email re plan for case coverage during paternity leave	L120
Hashmall, Joseph	11/15/2021	\$645.00	0.4	\$ 258.00	Review of recently received report from Corelogic	L100
Hashmall, Joseph	11/16/2021	\$645.00	2	\$ 1,290.00	Review of ██████████, other portions of file, internal email regarding ██████████	L100
Hashmall, Joseph	11/18/2021	\$645.00	0.1	\$ 64.50	Internal email regarding draft complaint	L200
Hashmall, Joseph	11/18/2021	\$645.00	0.1	\$ 64.50	Internal email regarding draft complaint	L200
Hashmall, Joseph	11/22/2021	\$645.00	0.2	\$ 129.00	Internal email regarding facts of case, ██████████	L110
Hashmall, Joseph	11/23/2021	\$645.00	0.7	\$ 451.50	Review of ██████████, internal emails regarding ██████████	L100
Hashmall, Joseph	11/24/2021	\$645.00	2.2	\$ 1,419.00	Review of ██████████ documents, edits to draft complaint	L200
Hashmall, Joseph	11/24/2021	\$645.00	0.4	\$ 258.00	Review of ██████████ and next steps needed to file case, internal email regarding same	L120
Hashmall, Joseph	11/24/2021	\$645.00	0.3	\$ 193.50	Call with client ██████████	L210
Rios, Sophia M	11/29/2021	\$590.00	0.1	\$ 59.00	Review and respond to email re filing complaint.	L100
Drake, Eleanor Michelle	11/29/2021	\$980.00	1.5	\$ 1,470.00	review redline and revise complaint	L210
Drake, Eleanor Michelle	11/29/2021	\$980.00	0.7	\$ 686.00	research venues and potential assignments and local rules re discovery stay; email with J. Hashmall and J. Albanese re same	L210
Hashmall, Joseph	11/29/2021	\$645.00	0.2	\$ 129.00	Call with Michelle Drake regarding draft complaint	L200
Hashmall, Joseph	11/29/2021	\$645.00	0.2	\$ 129.00	Email to Sophia Rios regarding filing complaint in California	L200
Hashmall, Joseph	11/29/2021	\$645.00	0.5	\$ 322.50	Review of Michelle Drake's edits to draft complaint	L200
Hashmall, Joseph	11/30/2021	\$645.00	0.5	\$ 322.50	Revisions to draft complaint, internal email regarding same	L200
Hashmall, Joseph	12/2/2021	\$645.00	0.1	\$ 64.50	Litigation team meeting	L120
Drake, Eleanor Michelle	12/6/2021	\$980.00	0.8	\$ 784.00	review draft complaint with CA state law claims added, redline, revise, give approval for sending to co-counsel and S Rios	L210
Hashmall, Joseph	12/6/2021	\$645.00	0.7	\$ 451.50	Review of Michelle Drake's edits to complaint, further edits to same, drafting cover letter ██████████	L200

Hibray, Jean	12/6/2021	\$425.00	0.5	\$	212.50	Prepare cover letter and copy of draft complaint, [REDACTED]	L210
Rios, Sophia M	12/8/2021	\$590.00	1.7	\$	1,003.00	Review [REDACTED] files; discuss case and investigation with Joe; review and revise complaint	L100
Drake, Eleanor Michelle	12/8/2021	\$980.00	0.1	\$	98.00	call with team re case status and next steps	L100
Hashmall, Joseph	12/8/2021	\$645.00	0.6	\$	387.00	Review of Sophia Rios' edits to draft complaint, further edits to same. Internal emails and email to cocounsel regarding same	L200
Hibray, Jean	12/8/2021	\$425.00	0.9	\$	382.50	Proof and format complaint	L210
Hibray, Jean	12/8/2021	\$425.00	0.5	\$	212.50	Review [REDACTED] procedures	L210
Hibray, Jean	12/8/2021	\$425.00	0.5	\$	212.50	Prepare initiating docs	L210
Hashmall, Joseph	12/9/2021	\$645.00	0.5	\$	322.50	Review of revisions to complaint, emails to cocounsel and internal emails regarding same	L200
Drake, Eleanor Michelle	12/14/2021	\$980.00	0.1	\$	98.00	meet with team to discuss case status and next steps	L100
Hashmall, Joseph	12/14/2021	\$645.00	0.2	\$	129.00	Review of voicemail from client [REDACTED]	L200
Hashmall, Joseph	12/14/2021	\$645.00	0.2	\$	129.00	Internal emails regarding filing of complaint	L200
Drake, Eleanor Michelle	1/4/2022	\$980.00	0.1	\$	98.00	team meeting to discuss next steps in litigation	L120
Drake, Eleanor Michelle	1/13/2022	\$980.00	1.5	\$	1,470.00	review [REDACTED], email co-counsel with recommendations regarding addition	L210
Drake, Eleanor Michelle	1/17/2022	\$980.00	1.2	\$	1,176.00	review files for [REDACTED]	L110
Drake, Eleanor Michelle	1/17/2022	\$980.00	0.8	\$	784.00	call with K Kelly re [REDACTED]	L120
Drake, Eleanor Michelle	1/17/2022	\$980.00	0.8	\$	784.00	redline and revise complaint, give approval for filing	L210
Hashmall, Joseph	1/17/2022	\$645.00	0.2	\$	129.00	Internal emails regarding filing of case	L100
Rios, Sophia M	1/18/2022	\$590.00	0.1	\$	59.00	Review and respond to email re filing complaint.	L100
Hashmall, Joseph	1/18/2022	\$645.00	0.1	\$	64.50	Call with Michelle Drake regarding next steps in case	L120
Hashmall, Joseph	1/18/2022	\$645.00	0.1	\$	64.50	Internal emails regarding preservation letters and draft discovery	L300
Hashmall, Joseph	1/18/2022	\$645.00	0.7	\$	451.50	Review of draft complaint, email to Sophia Rios regarding filing of same	L200
Hashmall, Joseph	1/18/2022	\$645.00	0.7	\$	451.50	Voicemail to client [REDACTED]	L200
Hashmall, Joseph	1/18/2022	\$645.00	0.2	\$	129.00	Review of emails regarding filing of case, internal emails in response to same	L100
Hashmall, Joseph	1/19/2022	\$645.00	0.2	\$	129.00	Voicemail to client [REDACTED]	L120
Hashmall, Joseph	1/19/2022	\$645.00	0.4	\$	258.00	Call [REDACTED], internal emails regarding next steps in case	L100
Drake, Eleanor Michelle	1/20/2022	\$980.00	0.9	\$	882.00	call with cocounsel re [REDACTED]	L120
Hashmall, Joseph	1/21/2022	\$645.00	0.8	\$	516.00	Review of documents regarding [REDACTED] internal emails regarding same	L100
Hashmall, Joseph	1/25/2022	\$645.00	0.4	\$	258.00	Call with [REDACTED]	L100
Hashmall, Joseph	1/25/2022	\$645.00	0.4	\$	258.00	Review of [REDACTED] file in advance of call [REDACTED]	L100
Hashmall, Joseph	1/25/2022	\$645.00	0.2	\$	129.00	Internal email regarding next steps in case	L100
Hashmall, Joseph	1/26/2022	\$645.00	0.3	\$	193.50	Review of draft letter [REDACTED], internal email regarding same	L100
Hashmall, Joseph	1/26/2022	\$645.00	0.2	\$	129.00	Internal email regarding [REDACTED]	L100
Hashmall, Joseph	1/26/2022	\$645.00	0.3	\$	193.50	Legal research regarding [REDACTED]	L120
Hibray, Jean	1/26/2022	\$425.00	0.3	\$	127.50	Draft, finalize and send letter [REDACTED]	L140
Hashmall, Joseph	1/27/2022	\$645.00	0.3	\$	193.50	Call with Michelle Drake regarding [REDACTED]	L100
Hashmall, Joseph	1/27/2022	\$645.00	0.2	\$	129.00	Internal email regarding next steps in case	L120
Drake, Eleanor Michelle	1/28/2022	\$980.00	0.5	\$	490.00	communicate with J. Hashmall re: revising complaint [REDACTED]	L210
Hashmall, Joseph	1/28/2022	\$645.00	0.2	\$	129.00	Internal email regarding next steps in case	L120
Drake, Eleanor Michelle	1/31/2022	\$980.00	0.5	\$	490.00	call with K. Kelly and J. Hashmall re [REDACTED]	L110
Hashmall, Joseph	1/31/2022	\$645.00	0.1	\$	64.50	Email to cocounsel regarding next steps in case	L120
Hashmall, Joseph	1/31/2022	\$645.00	0.3	\$	193.50	Call with cocounsel regarding filing of case	L120
Hashmall, Joseph	1/31/2022	\$645.00	0.5	\$	322.50	Review of [REDACTED], email to cocounsel regarding [REDACTED]	L100
Hashmall, Joseph	2/1/2022	\$645.00	0.3	\$	193.50	Emails with cocounsel regarding [REDACTED]	L100
Hashmall, Joseph	2/1/2022	\$645.00	0.3	\$	1,935.00	Redrafting complaint [REDACTED]	L200
Hashmall, Joseph	2/1/2022	\$645.00	0.1	\$	64.50	Internal emails regarding billing and accounting on file	L140
Hashmall, Joseph	2/2/2022	\$645.00	0.6	\$	387.00	Review of cocounsel's redines to draft complaint, email exchange regarding same	L200
Hashmall, Joseph	2/3/2022	\$645.00	1.2	\$	774.00	Review of updated draft complaint, internal email and email to cocounsel regarding same	L200
Hashmall, Joseph	2/7/2022	\$645.00	0.2	\$	129.00	Internal email regarding draft complaint	L200
Hashmall, Joseph	2/8/2022	\$645.00	0.6	\$	387.00	Review of and edits to draft complaint, internal email regarding same	L200
Albanese, John	2/9/2022	\$720.00	0.1	\$	72.00	Discuss case strategy with litigation team	L100
Drake, Eleanor Michelle	2/9/2022	\$980.00	0.1	\$	98.00	team meeting to discuss next steps in litigation	L120
Hashmall, Joseph	2/9/2022	\$645.00	0.2	\$	129.00	Internal email regarding draft complaint	L200
Hashmall, Joseph	2/9/2022	\$645.00	0.3	\$	193.50	Legal research regarding [REDACTED], internal emails regarding same	L120
Hashmall, Joseph	2/9/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120

Drake, Eleanor Michelle	2/14/2022	\$980.00	0.5	\$	490.00	review cases regarding [REDACTED], email with J. Hashmall re [REDACTED]	L120
Hashmall, Joseph	2/14/2022	\$645.00	0.5	\$	322.50	Research regarding [REDACTED], internal emails regarding same	L120
Drake, Eleanor Michelle	2/15/2022	\$980.00	1.7	\$	1,666.00	research caselaw regarding [REDACTED], send memo re same to J. Hashmall and suggest edits to complaint based thereon	L210
Hashmall, Joseph	2/15/2022	\$645.00	0.2	\$	129.00	Internal email regarding draft complaint	L200
Hashmall, Joseph	2/15/2022	\$645.00	1.6	\$	1,032.00	Revisions to draft complaint, internal emails regarding same	L200
Hashmall, Joseph	2/17/2022	\$645.00	0.3	\$	193.50	Email exchange with cocounsel regarding draft complaint	L200
Hashmall, Joseph	2/22/2022	\$645.00	0.2	\$	129.00	Email to cocounsel regarding filing of complaint, internal email regarding same	L200
Hashmall, Joseph	2/22/2022	\$645.00	0.4	\$	258.00	Internal email regarding filing of case, review of [REDACTED]	L200
Rios, Sophia M	2/23/2022	\$590.00	0.5	\$	295.00	Review [REDACTED] documents and revised complaint.	L100
Hashmall, Joseph	2/23/2022	\$645.00	0.6	\$	387.00	Email exchange with cocounsel regarding filing of complaint, internal emails regarding same	L200
Hibray, Jean	2/23/2022	\$425.00	0.6	\$	255.00	Review San Diego procedures, prepare civil cover sheet	L210
Hibray, Jean	2/23/2022	\$425.00	0.9	\$	382.50	Proof, format complaint, re-do for change of venue	L210
Hashmall, Joseph	2/24/2022	\$645.00	0.8	\$	516.00	Final pre-filing review of complaint and other supporting documents, internal email regarding same	L200
Hashmall, Joseph	2/24/2022	\$645.00	0.2	\$	129.00	Email exchange with John Albanese regarding service of complaint	L200
Hibray, Jean	2/24/2022	\$425.00	0.5	\$	212.50	Finalize complaint, cover sheet, submit to OneLegal for filing.	L210
Hibray, Jean	2/25/2022	\$425.00	0.2	\$	85.00	Review notice of case assignment and docket accordingly	L210
Hashmall, Joseph	2/28/2022	\$645.00	0.1	\$	64.50	Internal email regarding preservation letter	L200
Hibray, Jean	2/28/2022	\$425.00	0.1	\$	42.50	Email J Hashmall re plan for service	L210
Drake, Eleanor Michelle	3/2/2022	\$980.00	0.4	\$	392.00	call with J. Hashmall re case status and next steps	L120
Drake, Eleanor Michelle	3/4/2022	\$980.00	0.3	\$	294.00	call with J. Hashmall re contours of draft discovery	L310
Hashmall, Joseph	3/7/2022	\$645.00	0.2	\$	129.00	Review of case status and upcoming deadlines	L120
Hibray, Jean	3/7/2022	\$425.00	0.3	\$	127.50	Update summons form & resubmit	L210
Drake, Eleanor Michelle	3/8/2022	\$980.00	0.3	\$	294.00	team meeting re case status and next steps	L100
Drake, Eleanor Michelle	3/8/2022	\$980.00	0.5	\$	490.00	review redline and revise [REDACTED] emails with J Hashmall re same. Review [REDACTED]	L310
Drake, Eleanor Michelle	3/11/2022	\$980.00	0.4	\$	392.00	review status of file, check with J Hibray on status of service, communicate re need for 26f report, esi order, protective order, etc.	L120
Hibray, Jean	3/11/2022	\$425.00	0.7	\$	297.50	Prepare service packet, email Metro, set up POS form, email same	L210
Albanese, John	3/17/2022	\$720.00	0.1	\$	72.00	Meet with case team regarding case strategy	L100
Drake, Eleanor Michelle	3/17/2022	\$980.00	0.1	\$	98.00	check in meeting with team re upcoming deadlines and next steps	L100
Hashmall, Joseph	3/17/2022	\$645.00	0.2	\$	129.00	Litigation team meeting	L120
Hibray, Jean	3/22/2022	\$425.00	0.2	\$	85.00	Review CoreLogic service and respond to same.	L210
Hibray, Jean	3/25/2022	\$425.00	0.7	\$	297.50	Draft RFPs, Interrogos	L300
Hashmall, Joseph	3/31/2022	\$645.00	0.2	\$	129.00	Review of status of and deadlines in case	L120
Hibray, Jean	4/1/2022	\$425.00	0.4	\$	170.00	Draft joint motion & prop order re data	L210
Albanese, John	4/6/2022	\$720.00	0.1	\$	72.00	Meet with case team to discuss case strategy/	L100
Drake, Eleanor Michelle	4/6/2022	\$980.00	0.1	\$	98.00	team meeting to discuss next steps in litigation	L120
Hashmall, Joseph	4/6/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Rios, Sophia M	4/12/2022	\$590.00	0.4	\$	236.00	Review judge assignments and PHV draft for JH.	L100
Hibray, Jean	4/12/2022	\$425.00	0.1	\$	42.50	Review removal, email re same	L210
Hibray, Jean	4/12/2022	\$425.00	0.2	\$	85.00	Draft Hashmall pro hac for approval	L210
Hibray, Jean	4/12/2022	\$425.00	0.2	\$	85.00	Docket removal in file and on calendar	L210
Hibray, Jean	4/14/2022	\$425.00	0.2	\$	85.00	Finalize and file Hashmall pro hac	L210
Gionnette, Julie	4/15/2022	\$260.00	0.2	\$	52.00	download and review order; update calendar deadline	L140
Gionnette, Julie	4/18/2022	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Albanese, John	5/3/2022	\$720.00	0.1	\$	72.00	Attend case meeting with internal litigation team.	L100
Drake, Eleanor Michelle	5/3/2022	\$980.00	0.1	\$	98.00	team meeting re next steps in litigation	L120
Hashmall, Joseph	5/3/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Hashmall, Joseph	5/24/2022	\$645.00	0.2	\$	129.00	Review of case status and deadlines	L100
Hibray, Jean	5/24/2022	\$425.00	0.2	\$	85.00	Review order setting ENE, email with J Hashmall re same	L210
Hibray, Jean	5/24/2022	\$425.00	0.2	\$	85.00	Email dockets to Kelly Guzzo, set up pro hac and email re same	L210
Hibray, Jean	5/24/2022	\$425.00	0.1	\$	42.50	Review rules, respond to M Drake question re local counsel	L300
Gionnette, Julie	5/24/2022	\$260.00	0.4	\$	104.00	download and review notice and order; calendar deadlines	L140
Hibray, Jean	5/25/2022	\$425.00	0.2	\$	85.00	Call with co-counsel re pro hacs, emails re same	L210
Gionnette, Julie	5/26/2022	\$260.00	0.2	\$	52.00	download and review docket entries	L140
Hashmall, Joseph	5/31/2022	\$645.00	0.6	\$	387.00	Review of deadlines in case, email to cocounsel regarding draft discovery, upcoming 26(f)	L120

Gionnette, Julie	6/1/2022	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Gionnette, Julie	6/2/2022	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Albanese, John	6/3/2022	\$720.00	0.1	\$	72.00	Discuss case status with internal litigation team.	L100
Drake, Eleanor Michelle	6/3/2022	\$980.00	0.1	\$	98.00	call with entire litigation team re case status, upcoming deadlines and next steps in litigation	L120
Hashmall, Joseph	6/3/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Gionnette, Julie	6/7/2022	\$260.00	0.1	\$	26.00	download and review docket entries	L140
Hibray, Jean	6/7/2022	\$425.00	0.2	\$	85.00	Finalize and file Drake pro hac motion	L210
Hashmall, Joseph	6/9/2022	\$645.00	0.4	\$	258.00	Call with cocounsel regarding third party discovery in case	L300
Hashmall, Joseph	6/9/2022	\$645.00	0.5	\$	322.50	Emails with cocounsel regarding draft discovery, Rule 26(f) report	L200
Hashmall, Joseph	6/9/2022	\$645.00	0.4	\$	258.00	Edits to draft Meridian Link subpoena, internal emails regarding same	L300
Hibray, Jean	6/9/2022	\$425.00	0.8	\$	340.00	Draft initial disclosures, circulate	L300
Hibray, Jean	6/9/2022	\$425.00	0.6	\$	255.00	Draft subpoena papers, circulate, edit per M Drake and recirculate	L300
Hashmall, Joseph	6/10/2022	\$645.00	0.7	\$	451.50	Review of draft 26(f) report, emails regarding service of discovery, review of Defendant's discovery requests	L300
Hashmall, Joseph	6/10/2022	\$645.00	0.4	\$	258.00	Emails to cocounsel regarding discovery to serve after 26(f)	L300
Hashmall, Joseph	6/10/2022	\$645.00	0.2	\$	129.00	Attempting to join 26(f) conference call	L300
Hibray, Jean	6/10/2022	\$425.00	0.8	\$	340.00	Proof, format, finalize & e-serve RFPs, Interrogas Set I	L300
Hibray, Jean	6/10/2022	\$425.00	0.2	\$	85.00	Review def's requests to plaintiff, docket response	L300
Hashmall, Joseph	6/13/2022	\$645.00	0.5	\$	322.50	Edits to and internal emails regarding service of third party discovery	L300
Hibray, Jean	6/13/2022	\$425.00	0.4	\$	170.00	Proof, prep subpoena form, and e-serve MeridianLink packet on opposing	L300
Hibray, Jean	6/13/2022	\$425.00	0.1	\$	42.50	Email MeridianLink counsel re accept subpoena	L300
Drake, Eleanor Michelle	6/14/2022	\$980.00	0.6	\$	588.00	review D discovery requests to Plaintiff, internal email re responses	L310
Hashmall, Joseph	6/14/2022	\$645.00	0.3	\$	193.50	Emails with cocounsel, internal emails regarding responses to Defendant's discovery	L300
Hashmall, Joseph	6/15/2022	\$645.00	0.1	\$	64.50	Email to Meridian Link counsel regarding service of subpoena	L300
Hashmall, Joseph	6/16/2022	\$645.00	0.1	\$	64.50	Email with counsel for MeridianLink regarding subpoena service	L300
Hashmall, Joseph	6/16/2022	\$645.00	0.2	\$	129.00	Call with Michelle Drake regarding next steps in case	L120
Hashmall, Joseph	6/17/2022	\$645.00	0.4	\$	258.00	Review of email from opposing counsel regarding facts of case, investigation regarding same, email to coconusel regarding same	L300
Hashmall, Joseph	6/21/2022	\$645.00	0.4	\$	258.00	Review of draft initial disclosures, emails with cocounsel regarding same	L300
Hibray, Jean	6/21/2022	\$425.00	0.2	\$	85.00	Emails re initial disclosures	L300
Hibray, Jean	6/21/2022	\$425.00	0.2	\$	85.00	Proof, e-serve initial disclosures	L300
Hashmall, Joseph	6/23/2022	\$645.00	0.1	\$	64.50	Email to counsel for Meridian Link regarding response date to subpoena	L300
Hibray, Jean	6/23/2022	\$425.00	0.1	\$	42.50	Review Meridianlink email, docket subp resp	L300
Hashmall, Joseph	6/24/2022	\$645.00	0.2	\$	129.00	Email to cocounsel regarding case schedule	L200
Gionnette, Julie	6/27/2022	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Hashmall, Joseph	6/27/2022	\$645.00	0.1	\$	64.50	Email to cocounsel regarding case scheduling	L200
Gionnette, Julie	6/28/2022	\$260.00	0.2	\$	52.00	download and review docket entries	L140
Albanese, John	7/7/2022	\$720.00	0.1	\$	72.00	Discuss case with litigaiton team	L100
Drake, Eleanor Michelle	7/7/2022	\$980.00	0.1	\$	98.00	team meeting re case status, upcoming deadlines, and next steps in litigation	L120
Hashmall, Joseph	7/7/2022	\$645.00	0.1	\$	64.50	Email to cocounsel regarding discovery responses	L300
Hashmall, Joseph	7/7/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Hashmall, Joseph	7/15/2022	\$645.00	0.2	\$	129.00	Review of objections to subpeana from Meridian Link, email to counsel for Meridian Link regarding same	L300
Hashmall, Joseph	7/19/2022	\$645.00	0.1	\$	64.50	Email to counsel to Meridian Link regarding meet and confer	L300
Hashmall, Joseph	7/20/2022	\$645.00	0.1	\$	64.50	Email exchange with counsel for Meridian Link regarding meet and confer	L300
Hashmall, Joseph	7/22/2022	\$645.00	0.1	\$	64.50	Email exchange with Meridian Link counsel regarding meet and confer logistics	L300
Hashmall, Joseph	7/25/2022	\$645.00	0.5	\$	322.50	Email to counsel for Meridian Link regarding subpoena response; email to cocounsel regarding same	L400
Hashmall, Joseph	7/25/2022	\$645.00	0.2	\$	129.00	Meet and confer call with counsel for Meridian Link regarding subpoena response	L400
Hashmall, Joseph	8/1/2022	\$645.00	0.2	\$	129.00	Email exchanges with MeridianLink counsel and cocounsel regarding MeridianLink subpoena	L300
Albanese, John	8/2/2022	\$720.00	0.1	\$	72.00	Meet with litigaiton team to discuss case strategy	L100
Drake, Eleanor Michelle	8/2/2022	\$980.00	0.1	\$	98.00	team meeting to discuss next steps in litigation and upcoming deadlines	L120
Hashmall, Joseph	8/2/2022	\$645.00	0.6	\$	387.00	Emails with counsel for Meridian Link regarding subpoena, emails with cocounsel regarding same	L300
Hashmall, Joseph	8/2/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L100
Hashmall, Joseph	8/9/2022	\$645.00	0.9	\$	580.50	Review of and edits to draft discovery responses and privilege log, emails to cocounsel regarding same	L300
Hashmall, Joseph	8/10/2022	\$645.00	0.3	\$	193.50	Email to cocounsel regarding field selection for database discovery	L300
Hashmall, Joseph	8/11/2022	\$645.00	0.3	\$	193.50	Review of emails with opposing counsel regarding discovery, internal email regarding discovery call,	L300
Hibray, Jean	8/11/2022	\$425.00	0.4	\$	170.00	Review production emails, troubleshoot retrieving productions	L320

Rios, Sophia M	8/12/2022	\$590.00	0.1	\$	59.00	Respond to question re ENE statement.	L100
Drake, Eleanor Michelle	8/12/2022	\$980.00	0.8	\$	784.00	meet and confer with oc re data and ESI search terms	L310
Hashmall, Joseph	8/12/2022	\$645.00	0.6	\$	387.00	Meet and confer call with opposing counsel regarding database discovery	L300
Rios, Sophia M	8/15/2022	\$590.00	0.5	\$	295.00	Attention to questions re ENE statement	L100
Hashmall, Joseph	8/15/2022	\$645.00	0.5	\$	322.50	Review of letter to Court regarding early neutral evaluation, internal emails and emails to cocounsel regarding same	L160
Hibray, Jean	8/15/2022	\$425.00	0.3	\$	127.50	Proof and send ENE statement to magistrate.	L210
Hibray, Jean	8/22/2022	\$425.00	0.1	\$	42.50	Review new def prod for file	L300
Gionnette, Julie	8/25/2022	\$260.00	0.2	\$	52.00	download and review docket entries	L140
Drake, Eleanor Michelle	8/25/2022	\$980.00	0.7	\$	686.00	call with R Raether re ENE and CMC	L100
Drake, Eleanor Michelle	8/25/2022	\$980.00	0.5	\$	490.00	attend CMC and ENE	L230
Drake, Eleanor Michelle	8/25/2022	\$980.00	0.3	\$	294.00	email to team re CMC and call with opposing counsel and next steps in litigation	L120
Hibray, Jean	8/25/2022	\$425.00	0.2	\$	85.00	Review M Drake notes post-conference, update calendar, schedule call	L300
Gionnette, Julie	8/26/2022	\$260.00	0.9	\$	234.00	download and review scheduling order; calendar all deadlines	L140
Drake, Eleanor Michelle	8/29/2022	\$980.00	0.6	\$	588.00	call with cocounsel re discovery and other outstanding issues	L310
Hashmall, Joseph	8/29/2022	\$645.00	0.4	\$	258.00	Call with cocounsel regarding discovery in case, next steps in litigation	L300
Hashmall, Joseph	8/29/2022	\$645.00	0.3	\$	193.50	Drafting letter to opposing counsel regarding requests for production, internal email regarding same	L300
Hashmall, Joseph	8/29/2022	\$645.00	0.2	\$	129.00	Review of email from Michelle Drake regarding Rule 16	L120
Hashmall, Joseph	8/30/2022	\$645.00	0.2	\$	129.00	Review of status and deadlines in case	L120
Hashmall, Joseph	8/31/2022	\$645.00	0.1	\$	64.50	Internal email regarding discovery letter	L300
Hibray, Jean	8/31/2022	\$425.00	0.1	\$	42.50	Proof, finalize and send letter to opposing	L210
Hashmall, Joseph	9/6/2022	\$645.00	0.2	\$	129.00	Internal emails regarding discovery meet and confer	L300
Albanese, John	9/12/2022	\$720.00	0.1	\$	72.00	Meet with internal case team regarding case strategy.	L100
Drake, Eleanor Michelle	9/12/2022	\$980.00	0.1	\$	98.00	team meeting re next steps in litigation	L120
Hashmall, Joseph	9/12/2022	\$645.00	0.2	\$	129.00	Litigation team meeting	L120
Gionnette, Julie	9/13/2022	\$260.00	0.2	\$	52.00	download and review text order; review joint motion; calendar deadline	L140
Hashmall, Joseph	9/13/2022	\$645.00	0.3	\$	193.50	Call with cocounsel regarding discovery, possible amended complaint	L120
Hashmall, Joseph	9/13/2022	\$645.00	0.5	\$	322.50	Call with cocounsel regarding amended complaint	L120
Hashmall, Joseph	9/15/2022	\$645.00	1.6	\$	1,032.00	Review of Defendant's discovery responses, drafting email seeking meet and confer	L300
Hashmall, Joseph	9/16/2022	\$645.00	0.3	\$	193.50	Email to opposing counsel seeking to meet and confer regarding discovery	L300
Hashmall, Joseph	9/20/2022	\$645.00	0.4	\$	258.00	Emails to cocounsel, opposing counsel regarding discovery meet and confer	L300
Hashmall, Joseph	9/20/2022	\$645.00	0.5	\$	322.50	Meet and confer call with opposing counsel regarding Defendant's discovery requests	L300
Hashmall, Joseph	9/21/2022	\$645.00	0.2	\$	129.00	Email to opposing counsel following up on meet and confer	L300
Hashmall, Joseph	9/23/2022	\$645.00	0.2	\$	129.00	Email to opposing counsel following up on meet and confer	L300
Hashmall, Joseph	9/28/2022	\$645.00	0.5	\$	322.50	Review of notes from meet and confer, drafting email to opposing counsel following up on same	L300
Hashmall, Joseph	9/29/2022	\$645.00	0.3	\$	193.50	Call with Michelle Drake regarding discovery in case	L300
Hashmall, Joseph	9/29/2022	\$645.00	0.8	\$	516.00	Emails to cocounsel and opposing counsel regarding outstanding discovery issues	L300
Hashmall, Joseph	10/4/2022	\$645.00	0.7	\$	451.50	Review of [REDACTED], internal emails regarding same	L100
Albanese, John	10/6/2022	\$720.00	0.1	\$	72.00	Call with internal team regarding case strategy	L100
Drake, Eleanor Michelle	10/6/2022	\$980.00	0.1	\$	98.00	team meeting re next steps in litigation	L120
Hashmall, Joseph	10/6/2022	\$645.00	0.2	\$	129.00	Email to cocounsel regarding motion to compel	L300
Hashmall, Joseph	10/6/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L100
Drake, Eleanor Michelle	10/10/2022	\$980.00	0.5	\$	490.00	call with cocounsel re discovery and next steps with oc	L120
Hashmall, Joseph	10/10/2022	\$645.00	0.3	\$	193.50	Call with cocounsel regarding next steps in discovery	L300
Hashmall, Joseph	10/10/2022	\$645.00	0.3	\$	193.50	Email to opposing counsel regarding discovery meet and confer	L300
Hashmall, Joseph	10/12/2022	\$645.00	0.3	\$	193.50	Email exchange with cocounsel regarding communications with opposing counsel on data and depositions	L300
Hibray, Jean	10/13/2022	\$425.00	0.1	\$	42.50	Prepare Partner Counsel agreement, circulate	L320
Hashmall, Joseph	10/14/2022	\$645.00	0.1	\$	64.50	Internal email regarding setting up document review workspace	L300
Hibray, Jean	10/17/2022	\$425.00	0.9	\$	382.50	Recreate defendant production volumes, pull out client prods, prepare intake form, submit packet to Ricoh for new database	L320
Hibray, Jean	10/19/2022	\$425.00	0.2	\$	85.00	Gather missing images to Ricoh	L320
Hibray, Jean	10/19/2022	\$425.00	0.1	\$	42.50	Email case team re Relativity database	L320
Hashmall, Joseph	10/21/2022	\$645.00	0.2	\$	129.00	Internal email regarding Defendant's document production	L300
Hashmall, Joseph	10/21/2022	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding rescheduling data discovery meet and confer call	L300
Hashmall, Joseph	10/24/2022	\$645.00	0.1	\$	64.50	Emails with Michelle Drake regarding upcoming calls in case	L120
Hashmall, Joseph	10/24/2022	\$645.00	0.4	\$	258.00	Attempting to have call with opposing counsel regarding data, emails with cocounsel regarding same	L300

Hibray, Jean	10/25/2022	\$425.00	0.2	\$	85.00	Review new def prod, submit to Ricoh	L320
Albanese, John	11/2/2022	\$720.00	0.1	\$	72.00	Meet with team regarding case strategy.	L100
Drake, Eleanor Michelle	11/2/2022	\$980.00	0.1	\$	98.00	team meeting re next steps in litigation	L120
Hashmall, Joseph	11/2/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Hibray, Jean	11/2/2022	\$425.00	0.2	\$	85.00	Re-docket deadlines for S Rios	L140
Hashmall, Joseph	11/21/2022	\$645.00	0.3	\$	193.50	Emails with cocounsel regarding next steps in case	L120
Hashmall, Joseph	11/23/2022	\$645.00	0.2	\$	129.00	Email to cocounsel regarding next steps in case	L120
Drake, Eleanor Michelle	11/28/2022	\$980.00	1.1	\$	1,078.00	Review data proposal and sample from D; short memo to team re additional data we need to seek	L310
Drake, Eleanor Michelle	11/29/2022	\$980.00	0.5	\$	490.00	call with K Kelly and A Guzzo re defendant proposed data sample	L310
Drake, Eleanor Michelle	11/29/2022	\$980.00	0.6	\$	588.00	call with oc re proposed data sample	L310
Hashmall, Joseph	11/29/2022	\$645.00	0.4	\$	258.00	ESI discussion with opposing counsel	L300
Hashmall, Joseph	11/29/2022	\$645.00	0.3	\$	193.50	Drafting email to opposing counsel regarding ESI discussion	L300
Hashmall, Joseph	11/29/2022	\$645.00	1.4	\$	903.00	Review of documents and written discovery responses produced by Defendant, internal email regarding same	L300
Hashmall, Joseph	11/29/2022	\$645.00	0.4	\$	258.00	Call with cocounsel regarding upcoming ESI discussion with opposing counsel	L120
Hashmall, Joseph	11/30/2022	\$645.00	0.3	\$	193.50	Email to opposing counsel regarding data discovery, internal emails regarding same	L300
Hashmall, Joseph	11/30/2022	\$645.00	0.7	\$	451.50	Review of corelogic documents to generate first draft of proposed search terms	L300
Hashmall, Joseph	12/6/2022	\$645.00	0.2	\$	129.00	Internal email regarding email search terms	L300
Drake, Eleanor Michelle	12/7/2022	\$980.00	0.5	\$	490.00	emails with J Hashmall re data for mediation and need for analysis	L160
Hashmall, Joseph	12/7/2022	\$645.00	0.3	\$	193.50	Internal email regarding data discovery, email to opposing counsel regarding same	L300
Hashmall, Joseph	12/7/2022	\$645.00	0.3	\$	193.50	Email exchange with cocounsel regarding mediation logistics	L160
Hibray, Jean	12/7/2022	\$425.00	0.1	\$	42.50	Review mediation information, docket same	L210
Hashmall, Joseph	12/9/2022	\$645.00	0.1	\$	64.50	Email exchange with opposing counsel regarding outstanding discovery issues	L300
Hashmall, Joseph	12/9/2022	\$645.00	1	\$	645.00	Review and coding of Defendant's production	L300
Albanese, John	12/12/2022	\$720.00	0.1	\$	72.00	Meet with team regarding case strategy	L100
Drake, Eleanor Michelle	12/12/2022	\$980.00	0.2	\$	196.00	team meeting to discuss upcoming deadlines and approach	L120
Hashmall, Joseph	12/12/2022	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Hashmall, Joseph	12/13/2022	\$645.00	2	\$	1,290.00	Review and coding of Defendant's document production	L300
Hashmall, Joseph	12/13/2022	\$645.00	0.4	\$	258.00	Email exchange with opposing counsel regarding pre-mediation production	L300
Hashmall, Joseph	12/16/2022	\$645.00	0.3	\$	193.50	Email exchange with opposing counsel regarding data discovery	L300
Hashmall, Joseph	12/28/2022	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding pre-mediation disclosure	L300
Hashmall, Joseph	12/28/2022	\$645.00	0.1	\$	64.50	Internal email setting time to discuss next steps in case	L120
Drake, Eleanor Michelle	1/3/2023	\$980.00	0.3	\$	294.00	call with J. Hashmall re status of discovery, upcoming deadlines, and next steps in litigation	L120
Hashmall, Joseph	1/3/2023	\$645.00	0.2	\$	129.00	Call with Michelle Drake regarding next steps in case	L120
Hashmall, Joseph	1/3/2023	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding pre-mediation disclosures	L300
Albanese, John	1/6/2023	\$720.00	0.1	\$	72.00	Discuss case status with litigation team	L100
Drake, Eleanor Michelle	1/6/2023	\$980.00	0.1	\$	98.00	team meeting to review upcoming deadlines and next steps in litigation	L120
Drake, Eleanor Michelle	1/6/2023	\$980.00	0.3	\$	294.00	correspondence with [REDACTED]	L130
Hashmall, Joseph	1/6/2023	\$645.00	0.3	\$	193.50	Review of emails with opposing counsel regarding ESI and pre-mediation disclosures, email with cocounsel regarding same	L300
Hashmall, Joseph	1/6/2023	\$645.00	0.2	\$	129.00	Litigation team meeting	L120
Hibray, Jean	1/6/2023	\$425.00	0.2	\$	85.00	Transfer exemplar prod to iManage.	L320
Drake, Eleanor Michelle	1/9/2023	\$980.00	0.4	\$	392.00	email correspondence with K. Kelly re identification of custodians and search terms	L310
Drake, Eleanor Michelle	1/9/2023	\$980.00	0.5	\$	490.00	call with opposing counsel re written data production, ESI search terms, and deadline for production of counts	L310
Hashmall, Joseph	1/9/2023	\$645.00	0.3	\$	193.50	Email exchange with cocounsel regarding third party discovery in case	L300
Hashmall, Joseph	1/9/2023	\$645.00	0.9	\$	580.50	Call with opposing counsel regarding pre-mediation disclosures, follow up call with cocounsel regarding same	L160
Hashmall, Joseph	1/9/2023	\$645.00	0.4	\$	258.00	Emails with [REDACTED], internal emails and emails to cocounsel regarding same	L300
Hashmall, Joseph	1/9/2023	\$645.00	0.6	\$	387.00	Internal emails regarding and with document reviewer for case	L300
Hashmall, Joseph	1/9/2023	\$645.00	0.4	\$	258.00	Emails with Hans Lodge regarding facts of case	L120
Hibray, Jean	1/9/2023	\$425.00	0.2	\$	85.00	Review def prod, submit to Ricoh	L320
Hibray, Jean	1/9/2023	\$425.00	0.1	\$	42.50	Set up account for Cavanaugh, email re same	L320
Cavanaugh, James	1/9/2023	\$695.00	0.3	\$	208.50	Received emails from Caitlin Coslett, Esq. and Joe Hashmall, Esq. re new case assignment reviewing document production from Defendant Corelogic. Replied to emails.	L300
Cavanaugh, James	1/9/2023	\$695.00	0.6	\$	417.00	Examined Class Action Complaint Marlene Steinberg v. CoreLogic Credco, LLC.	L300
Cavanaugh, James	1/9/2023	\$695.00	0.3	\$	208.50	Email correspondence with Joe Hashmall, Esq. re complaint and document production..	L300
Hashmall, Joseph	1/10/2023	\$645.00	0.3	\$	193.50	Meeting with document reviewer regarding document review project	L300

Hashmall, Joseph	1/10/2023	\$645.00	0.9	\$	580.50	Review of coding fields for document review project, internal emails regarding same	L300
Hibray, Jean	1/10/2023	\$425.00	0.8	\$	340.00	Draft 30b6 NOD, draft subpoenas (2)	L300
Cavanaugh, James	1/10/2023	\$695.00	0.2	\$	139.00	Receipt of email from Joe Hashmall, Esq. [REDACTED]	L300
Cavanaugh, James	1/10/2023	\$695.00	0.2	\$	139.00	Video conference telephone call with Joe Hashmall, Esq. re case background and document production.	L300
Cavanaugh, James	1/10/2023	\$695.00	1.5	\$	1,042.50	Initial examination of [REDACTED], which discusses, inter alia, [REDACTED]	L300
Cavanaugh, James	1/10/2023	\$695.00	5.1	\$	3,544.50	Factual research [REDACTED] [REDACTED] Research [REDACTED]	L300
Cavanaugh, James	1/10/2023	\$695.00	0.2	\$	139.00	Receipt of email from Joe Hashmall, Esq. with instructions to begin coding production of documents from CoreLogic Credco.	L300
Cavanaugh, James	1/10/2023	\$695.00	1.1	\$	764.50	Began review of documents from CoreLogic Credco: STEIN000001 to STEIN000496.	L300
Hashmall, Joseph	1/11/2023	\$645.00	0.3	\$	193.50	Review of draft 30b6 notice, email to cocounsel attaching same	L300
Cavanaugh, James	1/11/2023	\$695.00	8	\$	5,560.00	Examined and coded documents from CoreLogic Credco production: STEIN000507 to STEIN001926.	L300
Drake, Eleanor Michelle	1/12/2023	\$980.00	0.7	\$	686.00	review [REDACTED]	L110
Drake, Eleanor Michelle	1/12/2023	\$980.00	1.4	\$	1,372.00	review discovery served and draft memo re additional topics for 30b6, additional RFPs and additional interrogatories	L310
Hashmall, Joseph	1/12/2023	\$645.00	1	\$	645.00	Interviews with [REDACTED]	L300
Hashmall, Joseph	1/12/2023	\$645.00	0.4	\$	258.00	Emails with document review attorney regarding status, coding questions	L300
Hibray, Jean	1/12/2023	\$425.00	0.2	\$	85.00	Review judicial procedures, local rules on extensions	L210
Hibray, Jean	1/12/2023	\$425.00	0.4	\$	170.00	Draft joint motion and proposed order for extension	L210
Cavanaugh, James	1/12/2023	\$695.00	7.8	\$	5,421.00	Examined and coded documents from CoreLogic Credco production: STEIN001927 to STEIN002954.	L300
Cavanaugh, James	1/12/2023	\$695.00	0.2	\$	139.00	Drafted email re coding questions to Joe Hashmall, Esq. Received reply from Joe Hashmall, Esq.	L300
Hashmall, Joseph	1/13/2023	\$645.00	0.5	\$	322.50	Review of draft mediation statement, email to cocounsel regarding edits to same	L160
Hashmall, Joseph	1/13/2023	\$645.00	0.5	\$	322.50	Review of draft joint motion regarding extension, emails to cocounsel and opposing counsel regarding same	L200
Hibray, Jean	1/13/2023	\$425.00	0.1	\$	42.50	Email team re ex parte rules	L210
Hibray, Jean	1/13/2023	\$425.00	0.2	\$	85.00	Review number of requests allowed, review number of requests served, email team.	L300
Cavanaugh, James	1/13/2023	\$695.00	8	\$	5,560.00	Examined and coded documents from CoreLogic Credco production: STEIN001927 to STEIN003764.	L300
Drake, Eleanor Michelle	1/17/2023	\$980.00	0.6	\$	588.00	call with cocounsel re outstanding discovery issues and need for additional discovery	L120
Drake, Eleanor Michelle	1/17/2023	\$980.00	2.4	\$	2,352.00	review redline and revise mediation statement	L160
Hashmall, Joseph	1/17/2023	\$645.00	1	\$	645.00	Edits to draft 30b6 notice, drafting RFPs and Irogs, Set II	L300
Hashmall, Joseph	1/17/2023	\$645.00	0.5	\$	322.50	Call with cocounsel regarding mediation statement, settlement demand	L160
Hashmall, Joseph	1/17/2023	\$645.00	0.8	\$	516.00	Edits to draft mediation statement, emails to cocounsel regarding same	L160
Hashmall, Joseph	1/17/2023	\$645.00	0.2	\$	129.00	Emails with cocounsel regarding amendments to schedule	L300
Cavanaugh, James	1/17/2023	\$695.00	7.2	\$	5,004.00	Examined and coded documents from CoreLogic Credco production: STEIN003788 to STEIN004189. Re-examined previously code [REDACTED]	L300
Hashmall, Joseph	1/18/2023	\$645.00	0.1	\$	64.50	Email to document reviewer regarding status update	L300
Hashmall, Joseph	1/18/2023	\$645.00	0.1	\$	64.50	Internal email regarding draft discovery	L300
Cavanaugh, James	1/18/2023	\$695.00	9	\$	6,255.00	Examined and coded documents from CoreLogic Credco production: STEIN004213 to STEIN004391.	L300
Hashmall, Joseph	1/19/2023	\$645.00	0.3	\$	193.50	Review of draft order extending deadlines emails with cocounsel regarding same	L200
Cavanaugh, James	1/19/2023	\$695.00	1.5	\$	1,042.50	Factual research regarding [REDACTED] Uncovered and examined [REDACTED] (2200+ pages).	L300
Cavanaugh, James	1/19/2023	\$695.00	6.5	\$	4,517.50	Examined and coded documents from CoreLogic Credco production: STEIN004408 to STEIN005106.	L300
Cavanaugh, James	1/19/2023	\$695.00	0.6	\$	417.00	Re-examined previously coded documents for errors and omissions, and to review coded documents for summarizing in memorandum.	L300
Cavanaugh, James	1/19/2023	\$695.00	0.4	\$	278.00	Drafted memorandum summarizing findings in document production. Drafted email to Joe Hashmall, Esq, attaching memorandum summarizing findings. Drafted email to Joe Hashmall, Esq. attaching memorandum.	L300
Drake, Eleanor Michelle	1/20/2023	\$980.00	0.5	\$	490.00	call with mediator prior to mediation	L160
Drake, Eleanor Michelle	1/20/2023	\$980.00	0.8	\$	784.00	emails with cocounsel re additional information we need in discovery	L310
Drake, Eleanor Michelle	1/20/2023	\$980.00	1.5	\$	1,470.00	review data re potential class size	L310
Hashmall, Joseph	1/20/2023	\$645.00	0.8	\$	516.00	Edits to request for production, Set II and Interrogatories, Set II, emails with cocounsel regarding same	L300
Hashmall, Joseph	1/20/2023	\$645.00	0.3	\$	193.50	Review of memo from document review attorney	L300
Hashmall, Joseph	1/20/2023	\$645.00	0.5	\$	322.50	Review of draft request for extension emails with cocounsel regarding same	L200
Hashmall, Joseph	1/20/2023	\$645.00	0.6	\$	387.00	Emails with cocounsel regarding next steps in case, case schedule, discovery	L120
Hibray, Jean	1/20/2023	\$425.00	0.2	\$	85.00	Review new prod, submit to Ricoh	L320
Cavanaugh, James	1/20/2023	\$695.00	2	\$	1,390.00	Continued examination of [REDACTED]	L300

Cavanaugh, James	1/20/2023	\$695.00	5	\$ 3,475.00	Factual research regarding [REDACTED]	L300
Cavanaugh, James	1/20/2023	\$695.00	1	\$ 695.00	Examined Plaintiff's document production STEINBERG 000001 containing [REDACTED]	L300
Drake, Eleanor Michelle	1/23/2023	\$980.00	0.5	\$ 490.00	call with K Kelly re R raether conversation	L160
Drake, Eleanor Michelle	1/23/2023	\$980.00	0.5	\$ 490.00	call with mediator prior to mediation	L160
Hibray, Jean	1/23/2023	\$425.00	0.1	\$ 42.50	Draft Exhibit A to Big 3 subpoenas	L300
Cavanaugh, James	1/23/2023	\$695.00	3	\$ 2,085.00	Researched [REDACTED] Factual research regarding [REDACTED] Searched for references to [REDACTED]	L300
Cavanaugh, James	1/23/2023	\$695.00	4.8	\$ 3,336.00	Factual research regarding [REDACTED]	L300
Cavanaugh, James	1/23/2023	\$695.00	0.2	\$ 139.00	Drafted email to Joe Hashmall Esq. regarding an update on factual research [REDACTED]	L300
Hibray, Jean	1/24/2023	\$425.00	0.3	\$ 127.50	DocuSign [REDACTED]. Set up ShareFile of requested docs	L210
Cavanaugh, James	1/24/2023	\$695.00	0.2	\$ 139.00	Drafted email to Joe Hashmall, Esq. regarding factual research with a [REDACTED]	L300
Cavanaugh, James	1/24/2023	\$695.00	4.6	\$ 3,197.00	Continued examination of [REDACTED] continuing searches for references to [REDACTED]	L300
Cavanaugh, James	1/24/2023	\$695.00	4.2	\$ 2,919.00	Researched [REDACTED]	L300
Hashmall, Joseph	1/25/2023	\$645.00	0.3	\$ 193.50	Email exchange with document review attorney regarding project status	L300
Hashmall, Joseph	1/25/2023	\$645.00	0.5	\$ 322.50	Edits to draft discovery requests, Set II, internal emails regarding same	L300
Cavanaugh, James	1/25/2023	\$695.00	2.5	\$ 1,737.50	Examination of [REDACTED]	L300
Cavanaugh, James	1/25/2023	\$695.00	2	\$ 1,390.00	Began draft of memorandum regarding [REDACTED]	L300
Cavanaugh, James	1/25/2023	\$695.00	1.5	\$ 1,042.50	Continued research regarding [REDACTED] Incorporated research results into draft memorandum.	L300
Cavanaugh, James	1/25/2023	\$695.00	2.7	\$ 1,876.50	Researched [REDACTED]	L300
Cavanaugh, James	1/25/2023	\$695.00	0.3	\$ 208.50	Email correspondence with Joe Hashmall, Esq. regarding an update on factual research concerning [REDACTED]	L300
Drake, Eleanor Michelle	1/26/2023	\$980.00	1.6	\$ 1,568.00	review redline and revise interrogatories, requests to produce and Exhibit A to subpoena. Approve for service	L310
Hashmall, Joseph	1/26/2023	\$645.00	0.8	\$ 516.00	Edits to draft discovery, emails with cocounsel regarding same	L300
Hibray, Jean	1/26/2023	\$425.00	0.6	\$ 255.00	Proof, finalize RFPs, Irogs II, e-serve same.	L300
Cavanaugh, James	1/26/2023	\$695.00	6.4	\$ 4,448.00	Continued draft of memorandum regarding [REDACTED] Incorporated research results into draft memorandum.	L300
Drake, Eleanor Michelle	1/27/2023	\$980.00	6	\$ 5,880.00	attend mediation, send follow up correspondence	L160
Drake, Eleanor Michelle	1/27/2023	\$980.00	2.3	\$ 2,254.00	review redline and revise letters to oc re meet and confer discoveryr sisues and motion to extend discovery deadlines	L310
Drake, Eleanor Michelle	1/27/2023	\$980.00	1.2	\$ 1,176.00	draft to do list for team and discuss same	L120
Hashmall, Joseph	1/27/2023	\$645.00	6	\$ 3,870.00	Attend mediation	L160

Cavanaugh, James	1/27/2023	\$695.00	8.8	\$	6,116.00	Continued draft of memorandum regarding [REDACTED] [REDACTED] Incorporated research results into draft memorandum.	L300
Cavanaugh, James	1/29/2023	\$695.00	3	\$	2,085.00	Continued and completed draft of memorandum regarding [REDACTED] [REDACTED] Incorporated research results into draft memorandum. Emailed memorandum to Joe Hashmall Esq.	L300
Hashmall, Joseph	1/30/2023	\$645.00	0.3	\$	193.50	Email to Jonathan Jaffe regarding [REDACTED]	L300
Hashmall, Joseph	1/30/2023	\$645.00	0.6	\$	387.00	Review and updates to internal case to-do list, internal emails regarding same	L120
Hashmall, Joseph	1/30/2023	\$645.00	0.5	\$	322.50	Review of memo regarding [REDACTED], email to author regarding same	L120
Hibray, Jean	1/30/2023	\$425.00	0.2	\$	85.00	Set up Task List on ShareFile, email team.	L300
Cavanaugh, James	1/30/2023	\$695.00	0.5	\$	347.50	Email correspondence with Joe Hashmall Esq. regarding [REDACTED] [REDACTED] Uploaded [REDACTED] to shared folder in iManage. CASE NO. 21215.	L300
Hashmall, Joseph	1/31/2023	\$645.00	0.3	\$	193.50	Emails with expert regarding [REDACTED]	L300
Hashmall, Joseph	2/3/2023	\$645.00	0.2	\$	129.00	Internal email regarding motion to compel deadline	L300
Hashmall, Joseph	2/3/2023	\$645.00	0.8	\$	516.00	Review of file, docket and transcript for use in discovery dispute with Defendant, email with cocounsel regarding same	L300
Gionnette, Julie	2/6/2023	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Hashmall, Joseph	2/6/2023	\$645.00	0.6	\$	387.00	Review of and edits to draft stipulation amended schedule, internal emails and emails to cocounsel regarding filing of same	L200
Hibray, Jean	2/6/2023	\$425.00	0.3	\$	127.50	Edit and finalize joint motion for extension, edit prop order for same.	L210
Hibray, Jean	2/6/2023	\$425.00	0.2	\$	85.00	Finalize and file joint motion for extension, email prop order to chambers.	L210
Gionnette, Julie	2/7/2023	\$260.00	0.3	\$	78.00	download and review amended scheduling order; update calendar deadlines	L140
Hashmall, Joseph	2/10/2023	\$645.00	0.2	\$	129.00	Internal email regarding discovery outstanding	L300
Hashmall, Joseph	2/13/2023	\$645.00	0.2	\$	129.00	Internal email regarding discovery outstanding	L300
Hashmall, Joseph	2/15/2023	\$645.00	0.2	\$	129.00	Emails to cocounsel regarding next steps in case	L120
Drake, Eleanor Michelle	2/16/2023	\$980.00	1	\$	980.00	meet and confer with oc re search terms and other discovery issues	L310
Hashmall, Joseph	2/16/2023	\$645.00	0.7	\$	451.50	Meet and confer call with opposing counsel	L300
Hashmall, Joseph	2/16/2023	\$645.00	0.4	\$	258.00	Call with cocounsel regarding next steps in discovery	L300
Gionnette, Julie	2/17/2023	\$260.00	0.1	\$	26.00	download and review docket entries	L140
Hashmall, Joseph	2/17/2023	\$645.00	0.7	\$	451.50	Revising draft third party discovery, internal emails regarding same	L300
Hibray, Jean	2/17/2023	\$425.00	0.1	\$	42.50	Draft letter for subpoenas	L300
Hashmall, Joseph	2/20/2023	\$645.00	0.3	\$	193.50	Internal emails regarding discovery	L300
Drake, Eleanor Michelle	2/21/2023	\$980.00	0.5	\$	490.00	follow up call with C Hanson	L160
Drake, Eleanor Michelle	2/21/2023	\$980.00	2.6	\$	2,548.00	call with opposing counsel and Rod Max mediator re settlement negotiations	L160
Drake, Eleanor Michelle	2/21/2023	\$980.00	0.5	\$	490.00	follow up call with opposing counsel Cindy Hanson	L160
Drake, Eleanor Michelle	2/21/2023	\$980.00	0.8	\$	784.00	call with K. Kelly and A. Guzzo	L160
Hibray, Jean	2/21/2023	\$425.00	0.1	\$	42.50	Review emails re response extension, docket same	L300
Drake, Eleanor Michelle	2/23/2023	\$980.00	0.5	\$	490.00	call with C Hanson	L160
Drake, Eleanor Michelle	3/1/2023	\$980.00	0.6	\$	588.00	email to oc re document production	L310
Drake, Eleanor Michelle	3/2/2023	\$980.00	0.4	\$	392.00	correspondence with oc re discovery production and terms	L310
Drake, Eleanor Michelle	3/3/2023	\$980.00	1.2	\$	1,176.00	respond to correspondence from oc re search terms, JIRA, depositions, PII, etc.	L310
Drake, Eleanor Michelle	3/4/2023	\$980.00	1	\$	980.00	emails to team and oc re status of settlement negotiations	L160
Drake, Eleanor Michelle	3/4/2023	\$980.00	0.9	\$	882.00	emails to opposing counsel re discovery and search terms	L310
Drake, Eleanor Michelle	3/6/2023	\$980.00	0.4	\$	392.00	call with C Hanson re potential stay and terms	L160
Drake, Eleanor Michelle	3/6/2023	\$980.00	1.8	\$	1,764.00	review and mark up initial terms sheet, call with cocounsel re same and next steps in litigation	L160
Hashmall, Joseph	3/7/2023	\$645.00	0.6	\$	387.00	Review of draft terms sheet and edits to same, internal emails regarding same	L160
Gionnette, Julie	3/8/2023	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Drake, Eleanor Michelle	3/8/2023	\$980.00	0.7	\$	686.00	review and agree to motion to stay; call with K Kelly re settlement term sheet	L160
Drake, Eleanor Michelle	3/8/2023	\$980.00	0.7	\$	686.00	review and agree to motion to stay; call with K Kelly re settlement term sheet	L160
Hashmall, Joseph	3/8/2023	\$645.00	0.3	\$	193.50	Review of production, internal email regarding the processing of same	L300
Hibray, Jean	3/8/2023	\$425.00	0.2	\$	85.00	Review new def prod, submit to Ricoh	L320
Hibray, Jean	3/8/2023	\$425.00	0.1	\$	42.50	Docket MTC	L300
Gionnette, Julie	3/13/2023	\$260.00	0.2	\$	52.00	review and save order to iManage; calendar deadline	L140
Drake, Eleanor Michelle	3/13/2023	\$980.00	1.1	\$	1,078.00	review redline and revise term sheet	L160

Gionnette, Julie	3/14/2023	\$260.00	0.1	\$	26.00	update calendar with dial-in information for status hearing	L140
Hashmall, Joseph	3/15/2023	\$645.00	0.2	\$	129.00	Internal email regarding upcoming status conference	L200
Gionnette, Julie	3/20/2023	\$260.00	0.4	\$	104.00	download and review order; update calendar deadlines	L140
Hashmall, Joseph	3/21/2023	\$645.00	0.1	\$	64.50	Email with Michelle Drake regarding next steps in case	L120
Hashmall, Joseph	3/28/2023	\$645.00	0.2	\$	129.00	Email to cocounsel regarding terms sheet	L160
Hashmall, Joseph	3/31/2023	\$645.00	0.3	\$	193.50	Review of revised terms sheet	L160
Hashmall, Joseph	4/3/2023	\$645.00	0.2	\$	129.00	Litigation team meeting	L120
Hashmall, Joseph	4/3/2023	\$645.00	0.2	\$	129.00	Email to cocounsel regarding terms sheet	L160
Drake, Eleanor Michelle	4/4/2023	\$980.00	0.7	\$	686.00	call with C hanson re settlement terms and counter, email cocounsel re conversation and recommendations for next steps	L160
Hashmall, Joseph	4/4/2023	\$645.00	0.4	\$	258.00	Edits to draft terms sheet, email to cocounsel attaching same	L160
Drake, Eleanor Michelle	4/5/2023	\$980.00	0.5	\$	490.00	draft and send correspondence to oc re plaintiff counter, key terms	L160
Drake, Eleanor Michelle	4/5/2023	\$980.00	0.5	\$	490.00	call with C Hanson re need to produce written discovery	L310
Hashmall, Joseph	4/5/2023	\$645.00	0.6	\$	387.00	internal emails regarding document review and confirmatory discovery	L300
Hibray, Jean	4/5/2023	\$425.00	0.4	\$	170.00	Review request to confirm re doc prods, email in response. Check for Bates gaps	L300
Drake, Eleanor Michelle	4/7/2023	\$980.00	0.6	\$	588.00	call with C hanson re final monetary agreement and other terms remaining for negotiations	L160
Drake, Eleanor Michelle	4/12/2023	\$980.00	0.8	\$	784.00	correspondence with and call to C Hanson re settlement status	L160
Gionnette, Julie	4/13/2023	\$260.00	0.1	\$	26.00	update calendar with dial-in information for upcoming hearing	L140
Gionnette, Julie	4/17/2023	\$260.00	0.1	\$	26.00	download and review minute order	L140
Drake, Eleanor Michelle	4/17/2023	\$980.00	0.4	\$	392.00	review and revise latest draft of term sheet	L160
Drake, Eleanor Michelle	4/17/2023	\$980.00	0.4	\$	392.00	conference with court	L160
Drake, Eleanor Michelle	4/17/2023	\$980.00	0.4	\$	392.00	call with opposing counsel re schedule for preliminary approval	L160
Drake, Eleanor Michelle	4/17/2023	\$980.00	0.4	\$	392.00	begin to arrange document reviewer for confirmatory discovery	L160
Drake, Eleanor Michelle	4/17/2023	\$980.00	0.4	\$	392.00	email memo to team re court conference, call with C Hanson and next steps for settlement finalization and approval-- assignments to each	L160
Hashmall, Joseph	4/17/2023	\$645.00	0.3	\$	193.50	Internal emails regarding processing and reviewing document production	L300
Hibray, Jean	4/17/2023	\$425.00	0.4	\$	170.00	Review new def prod, submit to Ricoh, email team re volume	L320
Hibray, Jean	4/18/2023	\$425.00	0.5	\$	212.50	Review terms sheet. Review judge procedures. Draft potential settlement timeline, email team.	L160
Hibray, Jean	4/19/2023	\$425.00	0.2	\$	85.00	Meet with M Drake re doc review plan	L320
Hashmall, Joseph	4/20/2023	\$645.00	0.5	\$	322.50	Internal emails regarding document review process and procedure	L300
Hibray, Jean	4/20/2023	\$425.00	0.7	\$	297.50	Review docs loaded, check file names, page counts, emails with team re what's included	L320
Hibray, Jean	4/20/2023	\$425.00	0.3	\$	127.50	Draft coding layout and saved searches	L320
Hibray, Jean	4/20/2023	\$425.00	0.3	\$	127.50	Set up saved searches in Relativity	L320
Hashmall, Joseph	4/25/2023	\$645.00	0.5	\$	322.50	Internal emails regarding case deadlines, document review, settlement terms sheet	L120
Hibray, Jean	4/25/2023	\$425.00	0.4	\$	170.00	Email re latest order, update calendar accordingly	L210
Hibray, Jean	4/25/2023	\$425.00	0.2	\$	85.00	Email re reviewer status	L320
Hibray, Jean	4/27/2023	\$425.00	0.9	\$	382.50	Emails re reviewer, set up letter for approval; calls with Parker re next steps (4); send Docusign of paperwork.	L160
Hibray, Jean	4/28/2023	\$425.00	0.2	\$	85.00	Emails re reviewer.	L160
Hashmall, Joseph	5/1/2023	\$645.00	0.2	\$	129.00	Internal email regarding settlement status	L160
Hibray, Jean	5/1/2023	\$425.00	0.3	\$	127.50	Draft email to Parker re: Relativity set up, review project details.	L160
Parker, Phyllis	5/2/2023	\$740.00	1	\$	740.00	Travel to and from 1818 Market/Home for computer, etc.	L160
Parker, Phyllis	5/2/2023	\$740.00	1.5	\$	1,110.00	Tom Mulholland helped set up BM computer/Relativity credentials	L160
Parker, Phyllis	5/2/2023	\$740.00	1.5	\$	1,110.00	Review complaint/work with JH on Time Entry Template set up	L160
Hashmall, Joseph	5/2/2023	\$645.00	0.2	\$	129.00	Internal email regarding settlement status	L160
Hibray, Jean	5/2/2023	\$425.00	1	\$	425.00	Training calls with P Parker for review project	L320
Parker, Phyllis	5/3/2023	\$740.00	3.5	\$	2,590.00	Review/Code Docs on First Pass Review [REDACTED]	L160
Hashmall, Joseph	5/3/2023	\$645.00	0.2	\$	129.00	Internal email regarding settlement status	L160
Hibray, Jean	5/3/2023	\$425.00	0.9	\$	382.50	Training calls with P Parker for review project	L320
Parker, Phyllis	5/4/2023	\$740.00	4.5	\$	3,330.00	Review/Code Docs on First Pass Review [REDACTED]	L160
Drake, Eleanor Michelle	5/4/2023	\$980.00	0.4	\$	392.00	review term sheet, send to J Hashmall for additional edits	L160

Drake, Eleanor Michelle	5/4/2023	\$980.00	0.5	\$	490.00	Call with opposing counsel re term sheet	L160
Hashmall, Joseph	5/4/2023	\$645.00	0.5	\$	322.50	Call with opposing counsel regarding settlement status	L160
Hibray, Jean	5/4/2023	\$425.00	0.1	\$	42.50	Email with Parker re review	L320
Parker, Phyllis	5/5/2023	\$740.00	7	\$	5,180.00	Review/Code Docs on First Pass Review in [REDACTED]	L160
Hashmall, Joseph	5/5/2023	\$645.00	0.7	\$	451.50	Edits to draft terms sheet, internal emails, emails to cocounsel, and emails to opposing counsel regarding same	L160
Hashmall, Joseph	5/5/2023	\$645.00	0.2	\$	129.00	Internal email regarding confirmatory document review status	L300
Hibray, Jean	5/5/2023	\$425.00	0.4	\$	170.00	Call with Parker re status of review	L320
Parker, Phyllis	5/8/2023	\$740.00	8	\$	5,920.00	Review/Code docs on First Pass Review [REDACTED]	L160
Hashmall, Joseph	5/8/2023	\$645.00	0.2	\$	129.00	Internal email regarding confirmatory document review project	L300
Hibray, Jean	5/8/2023	\$425.00	0.3	\$	127.50	Format & submit PMP time, email re same	L140
Hibray, Jean	5/8/2023	\$425.00	0.1	\$	42.50	Email re memo for review	L300
Parker, Phyllis	5/9/2023	\$740.00	5.5	\$	4,070.00	Review/Code doc on First Pass Review [REDACTED]	L160
Hashmall, Joseph	5/9/2023	\$645.00	0.2	\$	129.00	Internal emails regarding continued document review	L300
Hashmall, Joseph	5/9/2023	\$645.00	0.3	\$	193.50	Email exchange with opposing counsel regarding terms sheet	L160
Hibray, Jean	5/9/2023	\$425.00	0.6	\$	255.00	Calls with P Parker	L320
Parker, Phyllis	5/10/2023	\$740.00	6	\$	4,440.00	Review in [REDACTED]	L160
Hibray, Jean	5/10/2023	\$425.00	0.1	\$	42.50	Email Parker with memo details, template	L300
Parker, Phyllis	5/11/2023	\$740.00	6.5	\$	4,810.00	Review/Code/Analyse docs on First Pass Review in [REDACTED] search terms,using "extracted text" tool	L160
Hibray, Jean	5/11/2023	\$425.00	0.6	\$	255.00	Set up persistent highlighting for Parker, email instructions/screenshots	L320
Hibray, Jean	5/11/2023	\$425.00	0.1	\$	42.50	Email Parker re [REDACTED] questions	L300
Parker, Phyllis	5/12/2023	\$740.00	3.5	\$	2,590.00	Review/Code/Analyse docs on First Pass Review [REDACTED]	L160
Parker, Phyllis	5/15/2023	\$740.00	5.5	\$	4,070.00	Review/Code docs on First Pass review in [REDACTED]; also confirm via "extracted text" tool	L160
Hashmall, Joseph	5/15/2023	\$645.00	0.1	\$	64.50	Email to opposing counsel regarding terms sheet	L160
Hibray, Jean	5/15/2023	\$425.00	0.2	\$	85.00	Format and submit Parker time	L160
Parker, Phyllis	5/16/2023	\$740.00	3.5	\$	2,590.00	Review/Code docs on First Pass review [REDACTED]; and confirm via "extracted text" tool	L160
Hashmall, Joseph	5/16/2023	\$645.00	0.2	\$	129.00	Litigation team meeting	L120
Parker, Phyllis	5/17/2023	\$740.00	6	\$	4,440.00	Review/Code docs on First Pass Review in [REDACTED]; and confirm via "extracted text" tool	L160
Hashmall, Joseph	5/17/2023	\$645.00	0.1	\$	64.50	Email to opposing counsel regarding terms sheet	L160
Parker, Phyllis	5/18/2023	\$740.00	3.5	\$	2,590.00	Review/Code docs on First Pass Review [REDACTED]; confirm via "extracted text" tool	L160
Hashmall, Joseph	5/18/2023	\$645.00	0.3	\$	193.50	Email exchange with opposing counsel regarding terms sheet	L160
Parker, Phyllis	5/19/2023	\$740.00	4	\$	2,960.00	Review/analyze/select Hot Docs for possible inclusion in memo	L160
Hibray, Jean	5/19/2023	\$425.00	0.6	\$	255.00	Emails with Parker; set up saved searches requested, call with her re same	L320
Parker, Phyllis	5/21/2023	\$740.00	6.5	\$	4,810.00	Review/analyze/select docs for inclusion in Memo (notate "insert memo....")	L160
Parker, Phyllis	5/22/2023	\$740.00	1	\$	740.00	Review/analyze/select docs for inclusion in Memo (notate "insert memo....")	L160
Hibray, Jean	5/22/2023	\$425.00	0.3	\$	127.50	Set up requested saved searches, email with Parker re same	L320
Hashmall, Joseph	5/23/2023	\$645.00	0.2	\$	129.00	Internal emails and emails with cocounsel regarding mediator call	L260
Hibray, Jean	5/23/2023	\$425.00	0.4	\$	170.00	Email with Parker, set up change in views, email with screenshots	L320
Parker, Phyllis	5/25/2023	\$740.00	3.5	\$	2,590.00	Work on drafting memo	L160
Hibray, Jean	5/25/2023	\$425.00	0.7	\$	297.50	Calls with Parker re memo, instructions on copy and pasting	L320
Hibray, Jean	5/26/2023	\$425.00	0.5	\$	212.50	Review and submit reviewer's new time and invoice	L160
Parker, Phyllis	5/29/2023	\$740.00	3.5	\$	2,590.00	Analyze docs, draft Summary Memo with Selected documents [REDACTED]	L160
Parker, Phyllis	5/30/2023	\$740.00	5	\$	3,700.00	Analyze docs, draft Summary Memo with Selected documents [REDACTED]	L160
Parker, Phyllis	5/31/2023	\$740.00	6	\$	4,440.00	Analyze docs, draft Summary Memo with Selected documents [REDACTED]	L160

Parker, Phyllis	6/1/2023	\$740.00	3	\$	2,220.00	Analyze docs, draft Summary Memo with Selected documents	L160
Parker, Phyllis	6/2/2023	\$740.00	2	\$	1,480.00	Analyze docs, draft Summary Memo with Selected documents	L160
Parker, Phyllis	6/5/2023	\$740.00	5.5	\$	4,070.00	analyze docs/issues; draft Memo with selected citations	L160
Hashmall, Joseph	6/5/2023	\$645.00	0.3	\$	193.50	Emails with cocounsel regarding settlement schedule	L160
Parker, Phyllis	6/6/2023	\$740.00	3.5	\$	2,590.00	analyze docs/issues; draft Memo with	L160
Hashmall, Joseph	6/6/2023	\$645.00	0.2	\$	129.00	Internal email regarding document review	L300
Hashmall, Joseph	6/7/2023	\$645.00	0.6	\$	387.00	Review of memo from document reviewer regarding policies and procedures	L120
Hibray, Jean	6/7/2023	\$425.00	0.2	\$	85.00	Emails re Parker memo	L160
Hashmall, Joseph	6/12/2023	\$645.00	0.2	\$	129.00	Internal emails regarding document reviewer projects	L300
Hashmall, Joseph	6/12/2023	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding draft settlement	L160
Hibray, Jean	6/12/2023	\$425.00	0.3	\$	127.50	Call with Parker, email re same	L160
Hashmall, Joseph	6/14/2023	\$645.00	0.5	\$	322.50	Internal emails regarding draft terms sheet, drafting of settlement motions	L160
Hashmall, Joseph	6/16/2023	\$645.00	0.2	\$	129.00	Internal emails regarding draft settlement papers	L160
Hashmall, Joseph	6/20/2023	\$645.00	0.2	\$	129.00	Review of file status	L120
Hashmall, Joseph	6/21/2023	\$645.00	0.6	\$	387.00	Review of data regarding class membership, internal emails regarding response to opposing counsel regarding same	L160
Hashmall, Joseph	6/23/2023	\$645.00	0.2	\$	129.00	Review of case status	L120
Albanese, John	6/26/2023	\$720.00	0.1	\$	72.00	Discuss strategy with case team.	L100
Drake, Eleanor Michelle	6/26/2023	\$980.00	0.5	\$	490.00	call and follow up emails with oc re class settlement	L160
Hashmall, Joseph	6/26/2023	\$645.00	0.8	\$	516.00	Internal emails regarding drafting preliminary approval brief, status of draft settlement	L160
Hashmall, Joseph	6/26/2023	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Hibray, Jean	6/26/2023	\$425.00	0.2	\$	85.00	Emails re plan for prelim approval	L210
Drake, Eleanor Michelle	6/27/2023	\$980.00	0.8	\$	784.00	review redline and revise draft request for scheduling extension; email oc re same	L100
Hibray, Jean	6/27/2023	\$425.00	0.3	\$	127.50	Emails with J Gionnette re calendar, review entries same	L160
Gionnette, Julie	6/28/2023	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Hashmall, Joseph	6/28/2023	\$645.00	1.2	\$	774.00	Review of and edits to draft settlement agreement and exhibits, internal emails regarding same	L160
Hibray, Jean	6/28/2023	\$425.00	0.9	\$	382.50	Set up timeline based on agreement draft, edit same, email re same	L160
Hashmall, Joseph	6/29/2023	\$645.00	0.1	\$	64.50	Internal email regarding settlement edits	L160
Drake, Eleanor Michelle	6/30/2023	\$980.00	0.8	\$	784.00	review draft term sheet; call with K Kelly re same, redline and return	L160
Hashmall, Joseph	6/30/2023	\$645.00	0.1	\$	64.50	Internal email regarding edits to draft settlement	L160
Drake, Eleanor Michelle	7/3/2023	\$980.00	0.3	\$	294.00	correspondence with oc re settlement terms, schedule call for later this week	L160
Hashmall, Joseph	7/3/2023	\$645.00	0.4	\$	258.00	Review of draft settlement agreement, email to cocounsel regarding same	L160
Drake, Eleanor Michelle	7/5/2023	\$980.00	0.7	\$	686.00	call with opposing counsel re term sheet and settlement terms	L160
Hashmall, Joseph	7/5/2023	\$645.00	0.8	\$	516.00	Call with opposing counsel regarding draft settlement	L160
Hashmall, Joseph	7/5/2023	\$645.00	0.4	\$	258.00	Call with Corelogic counsel regarding subpoena response	L300
Hashmall, Joseph	7/5/2023	\$645.00	0.2	\$	129.00	Emails with opposing counsel setting up meet and confer call	L300
Hashmall, Joseph	7/5/2023	\$645.00	0.7	\$	451.50	Edits to draft settlement, email to opposing counsel attaching same, emails with cocounsel regarding same	L160
Hibray, Jean	7/5/2023	\$425.00	0.4	\$	170.00	Review order, update calendar accordingly	L210
Hibray, Jean	7/7/2023	\$425.00	2	\$	850.00	Drafting of memo for preliminary approval	L210
Hibray, Jean	7/10/2023	\$425.00	3	\$	1,275.00	Finish draft of prelim approval memo, caselaw research re same.	L210
Hashmall, Joseph	7/11/2023	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding revised settlement	L160
Hashmall, Joseph	7/11/2023	\$645.00	1.5	\$	967.50	Review of and edits to preliminary approval memo, internal emails regarding same	L200
Gionnette, Julie	7/12/2023	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Hashmall, Joseph	7/12/2023	\$645.00	0.2	\$	129.00	Internal email regarding preliminary approval brief and draft settlement	L160
Hashmall, Joseph	7/14/2023	\$645.00	0.3	\$	193.50	Call with opposing counsel regarding draft settlement, email to cocounsel regarding same	L160
Hashmall, Joseph	7/19/2023	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding draft settlement edits	L160
Hashmall, Joseph	7/19/2023	\$645.00	0.1	\$	64.50	Internal review of case status and deadlines	L120
Hashmall, Joseph	7/21/2023	\$645.00	0.8	\$	516.00	Review of Defendant's edits to draft settlement, internal emails regarding same	L160
Drake, Eleanor Michelle	7/25/2023	\$980.00	0.4	\$	392.00	correspondence with C Hanson re settlement term sheet and data	L160
Hashmall, Joseph	7/25/2023	\$645.00	0.7	\$	451.50	Emails with opposing counsel and internal emails regarding settlement and preliminary approval and settlement bids, email to administrator regarding same	L160
Hashmall, Joseph	7/26/2023	\$645.00	0.4	\$	258.00	Internal emails and emails with opposing counsel regarding preliminary approval extension	L160
Hashmall, Joseph	7/26/2023	\$645.00	0.4	\$	258.00	Emails with settlement administrators and opposing counsel regarding settlement administration bids	L160
Hashmall, Joseph	7/26/2023	\$645.00	0.3	\$	193.50	Review of draft request for extension, email exchange with opposing counsel regarding filing of same	L200
Gionnette, Julie	7/27/2023	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Hashmall, Joseph	7/27/2023	\$645.00	0.2	\$	129.00	Internal email regarding draft settlement	L160

Hashmall, Joseph	7/27/2023	\$645.00	0.6	\$	387.00	Review of bids from settlement administrators, internal emails and email to opposing counsel regarding same	L160
Hibray, Jean	7/27/2023	\$425.00	0.1	\$	42.50	Email to follow up on extension, agreement	L210
Gionnette, Julie	7/28/2023	\$260.00	0.3	\$	78.00	download and review updated scheduling order; update calendar deadlines	L140
Hashmall, Joseph	7/28/2023	\$645.00	1.6	\$	1,032.00	Review of draft settlement, notices and proposed orders, emails with cocounsel and opposing counsel regarding edits to same, email to potential settlement administrator regarding same	L160
Hashmall, Joseph	7/28/2023	\$645.00	0.2	\$	129.00	Review of case status	L120
Hashmall, Joseph	7/31/2023	\$645.00	0.2	\$	129.00	Call with Michelle Drake regarding settlement status	L160
Hashmall, Joseph	7/31/2023	\$645.00	0.5	\$	322.50	Review of revised settlement and exhibits, emails with cocounsel regarding same	L160
Hibray, Jean	7/31/2023	\$425.00	0.8	\$	340.00	Review draft agreement, update timeline, email re exhibit changes	L160
Hibray, Jean	7/31/2023	\$425.00	0.4	\$	170.00	Draft long form notice	L160
Hashmall, Joseph	8/1/2023	\$645.00	2	\$	1,290.00	Review of draft long form notice and proposed edits to other settlement documents, internal emails and emails to cocounsel regarding same, email to opposing counsel regarding same	L160
Hibray, Jean	8/1/2023	\$425.00	0.1	\$	42.50	Edit long form notice	L160
Hibray, Jean	8/1/2023	\$425.00	0.1	\$	42.50	Emails re other notice exhibits	L160
Hashmall, Joseph	8/2/2023	\$645.00	0.1	\$	64.50	Internal email regarding preliminary approval papers	L160
Hashmall, Joseph	8/3/2023	\$645.00	0.7	\$	451.50	Emails with cocounsel and opposing counsel regarding settlement documents	L160
Hashmall, Joseph	8/3/2023	\$645.00	0.1	\$	64.50	Internal email regarding preliminary approval papers	L160
Hashmall, Joseph	8/4/2023	\$645.00	0.7	\$	451.50	Emails to cocounsel and opposing counsel regarding cy pres and other settlement details	L160
Gionnette, Julie	8/7/2023	\$260.00	0.1	\$	26.00	download and review docket entry	L140
Drake, Eleanor Michelle	8/7/2023	\$980.00	0.7	\$	686.00	review opposing counsel edits to settlement agreement; email team re same	L160
Hashmall, Joseph	8/7/2023	\$645.00	0.1	\$	64.50	Litigation team meeting	L100
Hashmall, Joseph	8/7/2023	\$645.00	0.1	\$	64.50	Litigation team meeting	L100
Hashmall, Joseph	8/7/2023	\$645.00	0.1	\$	64.50	Internal email regarding preliminary approval papers	L160
Hashmall, Joseph	8/7/2023	\$645.00	0.6	\$	387.00	Review of Defendant's edits to class notice, internal emails and emails with cocounsel regarding same	L160
Hibray, Jean	8/7/2023	\$425.00	0.2	\$	85.00	Edit long form notice	L160
Hashmall, Joseph	8/8/2023	\$645.00	0.8	\$	516.00	Review of edits to settlement documents, email to opposing counsel regarding same	L160
Hashmall, Joseph	8/11/2023	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding draft settlement	L160
Drake, Eleanor Michelle	8/14/2023	\$980.00	0.3	\$	294.00	communications with opposing counsel re status of settlement	L160
Hashmall, Joseph	8/14/2023	\$645.00	0.2	\$	129.00	Email to opposing counsel regarding settlement status	L160
Hibray, Jean	8/14/2023	\$425.00	0.1	\$	42.50	Email re coverage needs	L210
Drake, Eleanor Michelle	8/15/2023	\$980.00	0.4	\$	392.00	call with C Hanson re class data	L160
Hashmall, Joseph	8/15/2023	\$645.00	0.4	\$	258.00	Internal emails regarding preliminary approval	L160
Hibray, Jean	8/15/2023	\$425.00	0.4	\$	170.00	Check latest drafts against timeline	L160
Hibray, Jean	8/15/2023	\$425.00	0.1	\$	42.50	Docket latest iterations of settlement docs	L160
Drake, Eleanor Michelle	8/16/2023	\$980.00	1.4	\$	1,372.00	review settlement agreement and proposed edit sharpening description of data used to identify claimants. Revise web notice to remove superfluous language and clarify claims process. Correspondence with administrator.	L160
Drake, Eleanor Michelle	8/16/2023	\$980.00	2.3	\$	2,254.00	review redline and revise motion and memo in support of class certification	L160
Hashmall, Joseph	8/16/2023	\$645.00	1.6	\$	1,032.00	Review of latest revisions to settlement and supporting documents, emails to cocounsel regarding same	L160
Hashmall, Joseph	8/16/2023	\$645.00	2.5	\$	1,612.50	Revisions to preliminary approval brief, internal emails and emails to cocounsel regarding same	L160
Gionnette, Julie	8/17/2023	\$260.00	1.6	\$	416.00	updated settlement exhibits; edits and formatting to motion for preliminary approval and added paragraph references from settlement agreement; draft Drake declaration ISO preliminary approval	L160
Drake, Eleanor Michelle	8/17/2023	\$980.00	0.3	\$	294.00	call with C Hanson re class data	L160
Hashmall, Joseph	8/17/2023	\$645.00	1.5	\$	967.50	Review of revised settlement materials, emails with cocounsel and opposing counsel regarding same, internal emails regarding same	L160
Gionnette, Julie	8/18/2023	\$260.00	0.1	\$	26.00	download and review docket entry (ECF 44)	L140
Drake, Eleanor Michelle	8/18/2023	\$980.00	0.4	\$	392.00	review redline and revise joint motion for extension	L160
Hashmall, Joseph	8/18/2023	\$645.00	0.5	\$	322.50	Email to opposing counsel regarding preliminary approval, internal emails regarding same	L150
Gionnette, Julie	8/21/2023	\$260.00	0.1	\$	26.00	download and review docket order (ECF 45); update calendar deadline	L140
Hibray, Jean	8/21/2023	\$425.00	0.1	\$	42.50	Emails re email box to set up	L160
Drake, Eleanor Michelle	8/23/2023	\$980.00	1	\$	980.00	preliminary approval final review and sign off	L160
Hibray, Jean	8/23/2023	\$425.00	0.1	\$	42.50	Check in on filing status	L210
Hibray, Jean	8/24/2023	\$425.00	0.5	\$	212.50	Pull down all cited docs from Parker memo for file	L160
Gionnette, Julie	8/25/2023	\$260.00	0.1	\$	26.00	download and review docket entries (ECF 46)	L140
Hibray, Jean	8/25/2023	\$425.00	0.5	\$	212.50	Review procedures/rules. Contact court for hearing date, update papers accordingly.	L160
Hibray, Jean	8/25/2023	\$425.00	0.5	\$	212.50	Finalize and file motion for preliminary approval papers. Download and submit request for judge's copy.	L160
Hibray, Jean	8/25/2023	\$425.00	0.5	\$	212.50	Emails with co-counsel and opposing counsel re finalizing prelim approval/settlement documents.	L160

Hibray, Jean	8/25/2023	\$425.00	1.5	\$	637.50	Proof motion & memo for prelim approval, input tables. Update and finalize counsel declarations and proposed order.	L160
Hashmall, Joseph	8/28/2023	\$645.00	0.8	\$	516.00	Review of preliminary approval papers, email to settlement administrator regarding same	L160
Hibray, Jean	8/28/2023	\$425.00	0.1	\$	42.50	Docket hearing	L210
Hibray, Jean	8/28/2023	\$425.00	0.2	\$	85.00	Emails with administrator with docket-stamped copies, Word versions	L160
Drake, Eleanor Michelle	8/31/2023	\$980.00	0.1	\$	98.00	meet with team re next steps	L120
Rios, Sophia M	9/26/2023	\$590.00	0.3	\$	177.00	Prepare court filing	L100
Hibray, Jean	9/26/2023	\$425.00	0.3	\$	127.50	Emails re hearing logistics	L210
Hibray, Jean	9/26/2023	\$425.00	0.3	\$	127.50	Finalize and file joint motion to appear by phone	L210
Hibray, Jean	9/27/2023	\$425.00	0.3	\$	127.50	Email with M Drake re motion, call clerk to confirm receipt	L210
Gionnette, Julie	9/27/2023	\$260.00	0.1	\$	26.00	download and review docket entries	L140
Drake, Eleanor Michelle	10/2/2023	\$980.00	2.5	\$	2,450.00	prepare for preliminary approval hearing	L160
Drake, Eleanor Michelle	10/2/2023	\$980.00	0.3	\$	294.00	attend preliminary approval hearing	L160
Drake, Eleanor Michelle	10/2/2023	\$980.00	0.3	\$	294.00	follow up with J Hashmall and T St. George re preliminary approval hearing	L160
Hashmall, Joseph	10/2/2023	\$645.00	0.6	\$	387.00	Review of preliminary approval order, email to administrator attaching same	L200
Hashmall, Joseph	10/2/2023	\$645.00	0.9	\$	580.50	Edits to draft notices and preliminary approval order, internal emails, emails to administrator and emails to opposing counsel regarding same	L200
Gionnette, Julie	10/2/2023	\$260.00	0.4	\$	104.00	download and review order (ECF 49); calendar hearing and deadlines	L140
Gionnette, Julie	10/3/2023	\$260.00	0.2	\$	52.00	update calendar deadlines; download and review docket entries (ECF 50-51)	L140
Hashmall, Joseph	10/3/2023	\$645.00	0.5	\$	322.50	Review of opposing counsel's edits to settlement notices, internal emails regarding same	L160
Hashmall, Joseph	10/3/2023	\$645.00	0.7	\$	451.50	Review of administrator's settlement timeline, internal settlement timeline, internal emails regarding same	L160
Hashmall, Joseph	10/3/2023	\$645.00	1.2	\$	774.00	Review of notice of filing and proposed order regarding revised notices, internal emails and emails to opposing counsel regarding same	L160
Hibray, Jean	10/3/2023	\$425.00	0.3	\$	127.50	Review emails re revisions to notices, review prelim approval order.	L210
Hibray, Jean	10/3/2023	\$425.00	0.8	\$	340.00	Draft order approving revisions, create clean and redline versions of each notice. Finalize and file, email to chambers.	L210
Hibray, Jean	10/3/2023	\$425.00	0.9	\$	382.50	Review admin timeline, update our internal dates, emails re same. Docket on calendar.	L160
Gionnette, Julie	10/4/2023	\$260.00	0.1	\$	26.00	download and review docket entry (ECF 52)	L140
Drake, Eleanor Michelle	10/5/2023	\$980.00	0.1	\$	98.00	team meeting to discuss case status	L120
Hashmall, Joseph	10/5/2023	\$645.00	0.1	\$	64.50	Litigation team meeting	L120
Hashmall, Joseph	10/5/2023	\$645.00	0.3	\$	193.50	Email to administrator regarding updated notices to class, email exchange regarding same	L160
Hashmall, Joseph	10/10/2023	\$645.00	0.7	\$	451.50	Review of revised class notices from the settlement administrator, email to cocounsel regarding same	L160
Hibray, Jean	10/10/2023	\$425.00	0.2	\$	85.00	Review and respond to emails re notices' contact information.	L210
Hashmall, Joseph	10/11/2023	\$645.00	0.4	\$	258.00	Review of revised settlement notices, emails with cocounsel regarding same	L160
Hashmall, Joseph	10/16/2023	\$645.00	0.5	\$	322.50	Further review of draft class notices, emails with cocounsel and with settlement administrator regarding same	L160
Hashmall, Joseph	10/20/2023	\$645.00	0.6	\$	387.00	Review of draft settlement website, internal emails and email to administrator regarding same	L160
Drake, Eleanor Michelle	10/24/2023	\$980.00	0.7	\$	686.00	communications with settlement administrator re email lookup and reminder notice	L160
Hashmall, Joseph	10/24/2023	\$645.00	0.3	\$	193.50	Internal email regarding settlement administration expenses	L160
Hashmall, Joseph	10/26/2023	\$645.00	0.4	\$	258.00	Internal emails and emails with administrator regarding changes to notice plan	L160
Hashmall, Joseph	10/31/2023	\$645.00	0.6	\$	387.00	Review of settlement website including claim form, internal emails and emails to administrator regarding same	L160
Hashmall, Joseph	11/1/2023	\$645.00	0.2	\$	129.00	Internal emails regarding staffing for responses to class member questions	L160
Hibray, Jean	11/2/2023	\$425.00	0.1	\$	42.50	Emails re contact plan	L160
Hashmall, Joseph	11/3/2023	\$645.00	0.5	\$	322.50	Internal emails, emails with cocounsel and emails with administrator regarding how to respond to class member inquiries	L160
Hashmall, Joseph	11/9/2023	\$645.00	0.1	\$	64.50	Litigation team call	L120
Hashmall, Joseph	11/9/2023	\$645.00	0.1	\$	64.50	Litigation team call	L120
Hashmall, Joseph	11/9/2023	\$645.00	0.1	\$	64.50	Email to cocounsel regarding upcoming deadlines	L120
Hashmall, Joseph	11/10/2023	\$645.00	0.3	\$	193.50	Call with class member regarding questions about settlement	L160
Hashmall, Joseph	11/10/2023	\$645.00	0.2	\$	129.00	Emails with Sophia Rios regarding class member question	L160
Hibray, Jean	11/10/2023	\$425.00	0.2	\$	85.00	Review and respond to settlement inquiries	L160
Hashmall, Joseph	11/13/2023	\$645.00	0.3	\$	193.50	Call with class member regarding questions about settlement	L160
Hashmall, Joseph	11/13/2023	\$645.00	0.2	\$	129.00	Internal email regarding class member contact	L160
Hibray, Jean	11/13/2023	\$425.00	0.8	\$	340.00	Return class member calls.	L160
Gionnette, Julie	11/14/2023	\$260.00	0.1	\$	26.00	download and review docket order (ECF 53); update calendar	L140
Hashmall, Joseph	11/14/2023	\$645.00	0.4	\$	258.00	Internal emails regarding follow up with Corelogic class members with settlement questions	L160
Hibray, Jean	11/14/2023	\$425.00	0.9	\$	382.50	Return class member calls.	L160
Hashmall, Joseph	11/15/2023	\$645.00	0.4	\$	258.00	Call with class member [REDACTED] internal email regarding same	L160

Hashmall, Joseph	11/17/2023	\$645.00	0.3	\$	195.50	Internal emails regarding drafting final approval and motion for fees	L200
Hashmall, Joseph	11/17/2023	\$645.00	0.2	\$	129.00	Internal email regarding call to class member [REDACTED]	L160
Hibray, Jean	11/17/2023	\$425.00	0.3	\$	127.50	Return class member calls.	L160
Hashmall, Joseph	11/20/2023	\$645.00	0.7	\$	451.50	Returning voicemails from class members with questions about settlement	L160
Hibray, Jean	11/20/2023	\$425.00	0.4	\$	170.00	Review and return VMs re settlement	L160
Hibray, Jean	11/22/2023	\$425.00	0.3	\$	127.50	Review and return VMs re settlement	L160
Hibray, Jean	11/25/2023	\$425.00	1.5	\$	637.50	Draft motion for fees, costs	L210
Hibray, Jean	11/25/2023	\$425.00	1.5	\$	637.50	Draft motion for final approval	L210
Hashmall, Joseph	11/27/2023	\$645.00	1	\$	645.00	Review of and revisions to draft fee petition	L200
Hibray, Jean	11/27/2023	\$425.00	3	\$	1,275.00	Drafting work on motions for fees and final approval	L210
Hashmall, Joseph	11/28/2023	\$645.00	0.9	\$	580.50	Review of and revisions to draft fee petition, internal email regarding same	L200
Hashmall, Joseph	11/28/2023	\$645.00	0.4	\$	258.00	Review of draft reminder notices, email to cocounsel regarding same	L160
Hibray, Jean	11/29/2023	\$425.00	0.6	\$	255.00	Return VMs from class members	L160
Hashmall, Joseph	11/30/2023	\$645.00	0.8	\$	516.00	Revisions to reminder notices, internal emails and emails to admin regarding same	L160
Hashmall, Joseph	11/30/2023	\$645.00	0.2	\$	129.00	Email exchange with cocounsel regarding inquires from class members	L160
Hashmall, Joseph	11/30/2023	\$645.00	0.1	\$	64.50	Internal email regarding draft fee petition	L200
Hibray, Jean	11/30/2023	\$425.00	0.4	\$	170.00	Return VMs from class members	L160
Drake, Eleanor Michelle	12/1/2023	\$980.00	0.4	\$	392.00	correspondence with settlement administrator re reminder notices	L160
Hashmall, Joseph	12/1/2023	\$645.00	0.4	\$	258.00	Internal emails and emails with administrator regarding reminder notices	L160
Hashmall, Joseph	12/1/2023	\$645.00	0.1	\$	64.50	Review of email from cocounsel regarding class member factual inquiries	L160
Hibray, Jean	12/1/2023	\$425.00	0.3	\$	127.50	Emails with admin re inquiries	L160
Hibray, Jean	12/1/2023	\$425.00	0.9	\$	382.50	Return VMs from class members	L160
Hashmall, Joseph	12/4/2023	\$645.00	0.1	\$	64.50	Internal emails regarding final approval papers	L100
Hibray, Jean	12/4/2023	\$425.00	0.1	\$	42.50	Emails re upcoming motion filings	L160
Hibray, Jean	12/4/2023	\$425.00	0.3	\$	127.50	Return VMs from class members	L160
Drake, Eleanor Michelle	12/5/2023	\$980.00	2.4	\$	2,352.00	review, redline, revise and comment on memo in support of final settlement approval	L160
Hashmall, Joseph	12/5/2023	\$645.00	0.1	\$	64.50	Internal email regarding final approval papers	L200
Hashmall, Joseph	12/5/2023	\$645.00	0.3	\$	193.50	Internal emails regarding response to class member inquiry	L160
Hashmall, Joseph	12/5/2023	\$645.00	2	\$	1,290.00	Edits to draft final approval motion	L200
Hibray, Jean	12/5/2023	\$425.00	0.1	\$	42.50	Emails re [REDACTED]	L160
Hibray, Jean	12/5/2023	\$425.00	0.1	\$	42.50	Email JND re admin declaration draft needed	L160
Drake, Eleanor Michelle	12/6/2023	\$980.00	2	\$	1,960.00	review redline and revise motion and memo in support of attorneys' fees, class representative incentive award, and costs of settlement administration	L260
Drake, Eleanor Michelle	12/6/2023	\$980.00	1.6	\$	1,568.00	review redline and revise motion and memo for attorneys fees and class representative incentive award	L160
Hashmall, Joseph	12/6/2023	\$645.00	2.8	\$	1,806.00	Edits to draft fee petition, internal emails regarding same	L200
Hashmall, Joseph	12/6/2023	\$645.00	2.2	\$	1,419.00	Edits to draft final approval brief, internal emails regarding same	L200
Hibray, Jean	12/6/2023	\$425.00	0.2	\$	85.00	Review prior database size for J Hashmall	L160
Hashmall, Joseph	12/7/2023	\$645.00	0.2	\$	129.00	Internal email regarding draft final approval papers	L200
Drake, Eleanor Michelle	12/8/2023	\$980.00	0.6	\$	588.00	review redline and revise updated attorneys fee and incentive award memo	L160
Drake, Eleanor Michelle	12/8/2023	\$980.00	0.7	\$	686.00	review redline and revise updated memo in support of final approval; request [REDACTED]	L160
Hashmall, Joseph	12/8/2023	\$645.00	1	\$	645.00	Edits to draft fee petition, internal emails and email to cocounsel regarding same	L200
Hashmall, Joseph	12/8/2023	\$645.00	1.8	\$	1,161.00	Edits to draft final approval brief, internal emails regarding same	L200
Hashmall, Joseph	12/11/2023	\$645.00	0.5	\$	322.50	Review of draft administrator declaration regarding notice, email to cocounsel regarding same	L160
Drake, Eleanor Michelle	12/12/2023	\$980.00	0.4	\$	392.00	emails with J hashmall re inquiry from settlement administrator	L160
Hashmall, Joseph	12/12/2023	\$645.00	0.6	\$	387.00	Emails with cocounsel regarding administrator's notice declaration, email to administrator regarding same	L160
Hashmall, Joseph	12/13/2023	\$645.00	0.6	\$	387.00	Review of cocounsel edits to draft fee petition and final approval motion, internal emails and email to cocounsel regarding same	L200
Hashmall, Joseph	12/13/2023	\$645.00	0.2	\$	129.00	Email to administrator regarding fees to request in fee petition	L200

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

MARLENE STEINBERG, *individually and* :
As a representative of the Class, :

Plaintiff, :

v. :

Civil Action No. 3:22-cv-00498-H-SBC

CORELOGIC CREDCO, LLC, :

Defendant. :

DECLARATION OF KRISTI C. KELLY

I, Kristi C. Kelly declare:

1. My name is Kristi C. Kelly. I am over 21 years of age, of sound mind, capable of executing this declaration, and have personal knowledge of the facts stated herein, and they are all true and correct.

2. I am one of the attorneys working on behalf of the Plaintiff in the above-styled litigation, and I am a founder and a partner of Kelly Guzzo, PLC, a law firm located at 3925 Chain Bridge Road, Suite 202, Fairfax, Virginia 22030. Prior to January 15, 2014, I was an attorney and equity partner at Surovell Isaacs Petersen & Levy, PLC, a nineteen-attorney law firm with offices in Fairfax, Virginia. My primary office was 4010 University Drive, Suite 200, Fairfax, Virginia 22030. I also worked for Legal Services of Northern Virginia focusing exclusively on housing and consumer law for approximately three years prior to Surovell Isaacs Petersen & Levy, PLC.

3. Since 2006, I have been and presently am a member in good standing of the Bar of the highest court of the Commonwealth of Virginia, where I regularly practice law. Since 2007, I have been and presently am a member in good standing of the Bar of the highest courts of the

District of Columbia and since 2014 of Maryland. I am also admitted in the United States District Courts for the District of Columbia and Maryland.

4. My law firm is committed to representing the most vulnerable—and often overlooked—consumers. We work with various legal aid organizations to help identify areas of need, where our firm can “step up” and meet those need through class action litigation or pro bono work. Many of these cases include seeking remedies for credit reporting errors or lending abuses. Kelly Guzzo was the co-recipient of the 2019 Frankie Muse Freeman Organizational Pro Bono Award by the Virginia State Bar Association.

5. I have taught numerous Continuing Legal Education programs for other attorneys in the areas of consumer law, including mortgage servicing abuses, dormant second mortgages, landlord tenant defense, dealing with debt collectors, credit reporting, defenses to foreclosure, discovery in federal court, resolving cases, and internet lending. I have taught these courses for various legal aid organizations, state and local bar associations, the National Consumer Law Center, the Consumer Federation of America, the National Council of Higher Education, and the National Association of Consumer Advocates at its various conferences. I was also a panelist for the Consumer Financial Protection Bureau and Federal Trade Commission on the issue of credit reporting.

6. My peers have recognized me as a Super Lawyer and Rising Star consistently for the past ten years. Additionally, I was selected to be a member of the Virginia Lawyers Weekly “Leader in the Law,” class of 2014, and Influential Women in the Law, class of 2020. I serve on the Board of Directors for the Legal Aid Justice Center and Virginia Poverty Law Center. I am a former State Chair for Virginia of the National Association of Consumer Advocates and am currently a member of the Partners’ Council for the National Consumer Law Center and Board of Directors of the National Association of Consumer Advocates.

7. I have also been appointed to the Merit Selection Panel for recommendation for the Magistrate Judge by the United States District Court Eastern District of Virginia, in both the Richmond and Alexandria Divisions.

8. In each of the class cases where I have represented plaintiffs in a consumer protection case, including cases such as the instant case, the Court found me to be adequate class counsel. See *Tsvetovat, v. Segan, Mason, & Mason, PC*, Case No. 1:12-cv-510 (E.D. Va.); *Conley v. First Tennessee Bank*, Case No. 1:10-cv-1247 (E.D. Va.); *Dreher v. Experian Information Solutions, Inc.*, Case No. 3:11-cv-624 (E.D. Va.); *Shami v. Middle East Broadcast Network*, Case No. 1:13-cv-467 (E.D. Va.); *Goodrow v. Friedman & MacFadyen*, Case No. 3:11-cv-20 (E.D. Va.); *Kelly v. Nationstar*, Case No. 3:13-cv-311 (E.D. Va.); *Thomas v. Wittstadt*, Case No. 3:12-cv-450 (E.D. Va.); *Fariasantos v. Rosenberg & Associates, LLC*, No. 3:13-cv-543 (E.D. Va.); *Morgan v. McCabe Weisberg & Conway, LLC*, Case No. 3:14-cv-695 (E.D. Va.); *Burke v. Shapiro, Brown & Alt, LLP*, Case No. 3:14-cv-838 (E.D. Va.); *Bartlow, et al., v Medical Facilities of America, Inc.*, Case No. 3:16-cv-573 (E.D. Va.); *Blocker v. Marshalls of MA, Inc.*, Case No. 1:14-cv-1940 (D.D.C.); *Ceccone v. Equifax Info. Servs., LLC*, Case No. 1:13-cv-1314 (D.D.C.); *Jenkins v. Equifax Info. Servs., LLC*, Case No. 1:15-cv-443 (E.D. Va.); *Ridenour v. Multi-Color Corporation*, Case No. 2:15-cv-00041 (E.D. Va.); *Hayes v. Delbert Services Corp.*, Case No. 3:14-cv-258 (E.D. Va.); *Campos-Carranza v. Credit Plus, Inc.*, Case No. 1:16-cv-120 (E.D. Va.); *Jenkins v. Realpage, Inc.*, Case No. 2:15-cv-1520 (E.D. Pa.); *Kelly v. First Advantage Background Services, Corp.*, Case No. 3:15-cv-5813 (D.N.J.); *Burke v. Seterus, Inc.*, Case No. 3:16-cv-785 (E.D. Va.); *Williams v. Corelogic Rental Property Solutions, LLC*, Case No. 8:16-cv-58 (D. Md.); *Clark v. Trans Union, LLC*, Case No. 3:15-cv-391 (E.D. Va.); *Clark v. Experian Information Solutions, Inc.*, Case No. 3:16-cv-32 (E.D. Va.); *Thomas v. Equifax Info. Servs., LLC*, Case No. 3:18-cv-684 (E.D. Va.); *Heath v. Trans Union, LLC*, Case No. 3:18-cv-720 (E.D. Va.), *Turner, v.*

ZestFinance, Inc., Case No. 3:19-cv-293 (E.D. Va.); *Galloway v. Williams*, Case No. 3:19-cv-470, 2020 WL 7482191, at *4 (E.D. Va. Dec. 18, 2020); *Gibbs v. TCV V, LP*, Case No. 3:19-cv-789 (E.D. Va.); *Gibbs v. Rees*, Case No. 3:20-cv-717 (E.D. Va.); *Pang v. Credit Plus, Inc.*, Case No. 1:20-cv-122 (D. Md.); *Brown v. RP On-Site, LLC*, Case No. 1:20-cv-482 (E.D. Va.); *Brown v. RP On-Site, LLC*, No. 1:20-cv-482 (E.D. Va.); *Brown v. Corelogic Rental Property Solutions, LLC*, No. 3:20-cv-363 (E.D. Va.); *Hengle v. Asner*, No. 3:19-cv-250 (E.D. Va.); and *Hill-Green v. Experian Information Solutions, Inc.*, No. 3:19-cv-708 (E.D. Va.).

9. The majority of my law firm's work is contingent or brought under a fee-shifting statute so we will generally not charge my clients a fee. For the past couple years, I have been regularly approved at a rate of \$550.00 per hour. *Brown v. RP On-Site, LLC*, Case No. 1:20-cv-482 (E.D. Va.); *Gibbs v. Plain Green, LLC*, 3:17-cv-00495 (E.D. Va. Dec. 13, 2019); *Turner v. ZestFinance, Inc.*, 3:19-cv-293 (E.D. Va. June 30, 2020); *Galloway v. Williams*, No. 3:19-cv-470, 2020 WL 7482191, at *11-12 (E.D. Va. Dec. 18, 2020); *Gibbs v. TCV V, LP*, 3:19-cv-789 (E.D. Va.); *Gibbs v. Rees*, 3:20-cv-717 (E.D. Va.). These rates have even been approved as reasonable in individual cases. *Garmer v. Easy Motors*, 1:20-cv-540 (E.D. Va. Nov. 23, 2020) (ECF 27 at 50); *Tsuchida v. Blackacre 1031 Exchange Services, LLC*, 2019-15803 (Fairfax County Circuit Court); *Rivera v. Blackacre 1031 Exchange Services, LLC*, 2019-15802 (Fairfax County Circuit Court); and most recently by Judge Brinkema in *Vela Diaz v. Equifax Info. Servs., LLC*, 1:23-cv-308 (E.D. Va. Aug. 29, 2023) (ECF 28 at 3)

10. Other attorneys from my firm that have worked on these cases include Andrew Guzzo, Casey Nash, and J. Patrick McNichol.

11. Andrew Guzzo was an associate at Surovell Isaacs Petersen & Levy, PLC and is currently a partner at Kelly Guzzo, PLC. He has regularly been approved in federal courts at a rate of \$550.00 per hour. He graduated from law school at Washington & Lee University in 2011.

The entire time he has been practicing law, he has practiced exclusively in the field of consumer protection litigation; litigating more than 400 hundred cases in federal court, including dozens of class actions. He is licensed to practice law in Virginia and Hawaii. He is the State Chair for Hawaii of the National Association of Consumer Advocates. He has also taught and trained lawyers, including class action and internet lending training sessions, as well as trainings for the annual Virginia Legal Aid Conference and the Consumer Federation of America. He has been named a Super Lawyer Rising Star for the past several years. He received the National Consumer Law Center's Rising Star Award in 2019.

12. Casey Nash was an associate at Consumer Litigation Associates, PC and is currently an associate at Kelly Guzzo, PLC. I supervise and work closely with Casey. Her hourly rate is \$525.00. She graduated from law school at the Catholic University of America in 2012. The entire time she has been practicing law, she has practiced exclusively in the field of consumer protection litigation. She has significant federal litigation experience, including litigation of over 350 federal cases and dozens of complex, class-action cases. She is licensed to practice law in Virginia and Washington, D.C. She has been named a Super Lawyers' Rising Star in Virginia and Washington, D.C. for the past several years. She has also taught and trained lawyers, including providing training about the FCRA and other consumer protection statutes to legal aid organizations. She has been approved as class counsel in numerous class action cases, including some of the cases listed above, as well as several others that she litigated during her time at Consumer Litigation Associates. *See, e.g., Soutter v. Equifax Information Services, LLC*, No. 3:10-cv-107 (E.D. Va.); *James v. Experian Information Solutions, Inc.*, No. 3:12-cv-908 (E.D. Va.); *Manuel v. Wells Fargo Nat'l Bank, N.A.*, No. 3:14-cv-00238 (E.D. Va.); *Milbourne v. JRK Residential Am., LLC*, No. 3:12-cv-00861 (E.D. Va.); *Thomas v. FTS USA, LLC*, No. 3:13-cv-825-REP (E.D. Va.).

13. J. Patrick McNichol is another lawyer at Kelly Guzzo, PLC. Prior to joining Kelly Guzzo, Mr. McNichol practiced law at McGuire Woods, where he handled hundreds of credit card, banking, and auto finance matters for large financial institutions. Before that, Pat completed two federal clerkships: first, for the Honorable Joseph R. Goodwin of the United States District Court for the Southern District of West Virginia, where he worked on the largest MDL in federal court history; and then, for the Honorable M. Hannah Lauck of the United States District Court for the Eastern District of Virginia. Pat has twice been named one of *The Best Lawyers in America: Ones to Watch for Banking and Finance Law* (2021 and 2022), and he twice co-authored the Virginia chapter in the ABA's *The Law of Class Action: Fifty-State Survey* (2020 and 2021). His hourly rate is \$525.00.

14. Natalie Cahoon is a paralegal at Kelly Guzzo, PLC, with over five years of experience in the legal field. She graduated from the University of Maine. Her hourly rate is \$225.00.

15. Ada Beltran is a paralegal at Kelly Guzzo, PLC, with over seven years of experience in the legal field. She graduated from George Mason University. Her hourly rate is \$225.00.

16. The majority of work my law firm handles is contingent, *pro bono* or brought under a fee-shifting statute, so our clients do not get charged a fee. Class actions are even more risky because they require more front-end work and the risk of nonpayment remains. However, my law firm is committed to identifying problems in the marketplace and seeking redress for a class of consumers (where appropriate). We do this because it is important to prevent future misconduct, seek relief for those harmed by the conduct who are usually unaware of their rights or unable to afford counsel, and deter other actors from the same behavior.

17. Attorneys' fees in most class settlements are calculated as a percentage of the settlement fund unless a fee amount is separately negotiated at the settlement, usually with the assistance of a mediator or Magistrate Judge. The fee was negotiated only after we had agreed to the other terms of the settlement with the assistance of a private mediator, Rodney Max.

18. A cross check of our lodestar supports the negotiated fee.

19. Generally, if a task does not take more than .1 (or six minutes), attorneys and paralegals at Kelly Guzzo, PLC will not bill for that task. This includes reviewing routine court filings, fielding brief telephone calls, responding to quick emails, etc.

20. My office staff exported the time expended by my law firm, which is attached as Exhibit A. We have billed 385.1 hours on this matter, for a total attorney fee lodestar of \$ \$171,607.50.

21. We completed significant work in this case, including: 1) spending significant time and resources investigating the claims, reviewing Plaintiff's documents and preparing the complaint; 2) conducting discovery, including written discovery, third-party discovery; numerous meet and confers and data analysis; 3) the investigation and engagement of potential expert to support our claims and help identify the class; 4) significant formal and informal settlement discussions; and 5) significant communications with class members to understand their rights and claims as part of the settlement.

22. My law firm has also advanced \$7,846.53 in costs. These costs include filing fees, federal express charges, copying fees, potential expert witness fees, mediator fees and secure database hosting charges.

23. I am familiar with the fees charged by other attorneys and approved by this Court for class action litigation. Attorneys' fees in most class settlements are calculated as a percentage of the settlement fund unless a fee amount is separately negotiated at the settlement, usually with

the assistance of a mediator or Magistrate Judge. Most percentage fees in class settlements that I am aware of are generally between 30-35%, but in this District and Division, I understand that 25% is the appropriate percentage. I believe that an attorneys' fee award of one-quarter in this instance is fair and appropriate. It is for these three main reasons: 1) both Berger Montague and my law firm were familiar with this Defendant and had extensive litigation in the past with it¹, allowing us to bring and litigate this matter in an efficient and strategic manner that provided an extraordinary result; 2) both Berger Montague and my law firm are one of just a handful of law firms in the country that have experience litigating class actions against resellers and deceased cases against resellers; 3) it promotes sound public policy to encourage thoughtful, efficient and strategic litigation, such as this, making this settlement possible.

24. We were also able to litigate this case efficiently because of previous work that we had conducted in a similar class case against CoreLogic's competitors, *Pang v. Credit Plus, Inc.*, 1:20-cv-122 (E.D. Md.) and *McAfee v. CIC Mortgage Credit, Inc.*, 3:22-cv-772 (E.D. Va.). In these cases, my firm litigated cases against resellers where a consumer was falsely labelled as deceased. This helped us to understand the marketplace, how the data works and the real world impact on the consumers who have a report published about them.

25. I am very proud of this settlement and our work to identify class members who will receive a substantial payment to remedy the publication of falsely reported deceased information.

26. Lastly, the Plaintiff was committed to litigating this case as a class action and securing relief for all of the class members affected by CoreLogic's conduct.

27. Marlene Steinberg, agreed to serve as a Class Representative in this lawsuit after

¹ See *Williams v. Corelogic Rental Property Solutions, LLC*, Case No. 8:16-cv-58 (D. Md.); *Witt v. CoreLogic SafeRent, LLC*, 3:15-cv-386 (E.D. Va.); *Henderson v. CoreLogic Nat'l Background Data, LLC*, 3:12-cv-97 (E.D. Va.).

we explained to her the responsibilities required of an individual serving in this role. Ms. Steinberg understood the basic theories of this lawsuit, has kept informed of the case's status, reviewed documents provided to her by Counsel, and has discussed aspects of the case with her attorneys. She has participated actively in this case by completing discovery, providing documentation, and being available for consultation during mediation. She also reviewed and approved the settlement in this matter.

28. The Plaintiff also put her reputation and privacy on the line by agreeing to participate in this litigation. She spent significant time and effort to help Class Counsel prosecute the claims on behalf on the class.

I declare under penalty of perjury of the laws of the United States that the foregoing is correct.

Signed this 15th of December, 2023.

/s/ Kristi C. Kelly
Kristi C. Kelly

Exhibit A

Date	Time	Description	Rate	Total	Staff
12/14/23	4.3	Telephone calls with class members.	\$525	\$2,257.50	Casey Nash
12/13/23	5.2	Telephone calls with class members.	\$525	\$2,730.00	Casey Nash
12/13/23	2.5	Legal research. Edit final approval motion.	\$525	\$1,312.50	Casey Nash
12/12/23	3	Edit KCK declaration and fee motion.	\$525	\$1,575.00	Casey Nash
12/12/23	3.9	Telephone calls with class members.	\$525	\$2,047.50	Casey Nash
12/11/23	4.7	Telephone calls with class members.	\$525	\$2,467.50	Casey Nash
12/10/23	2	Edit declaration; Edit final approval.	\$550	\$1,100.00	Kristi Kelly
12/8/23	0.7	Telephone calls with class members.	\$225	\$157.50	Ada Beltran
		Telephone calls and class member			
12/8/23	3.5	communications re class action.	\$225	\$787.50	Natalie Cahoon
		Review final approval brief; class member			
12/8/23	2.5	contacts; review emails and templates.	\$550	\$1,375.00	Kristi Kelly
12/8/23	0.8	Telephone calls with class members.	\$525	\$420.00	Casey Nash
12/7/23	5.5	Telephone calls with class members.	\$525	\$2,887.50	Casey Nash
		Telephone call with class members re:			
12/7/23	3.2	settlement.	\$550	\$1,760.00	Andrew Guzzo
		Prepare final approval declaration for			
12/7/23	1	attorney review.	\$225	\$225.00	Ada Beltran
12/6/23	4.5	Telephone calls with class members.	\$525	\$2,362.50	Casey Nash
		Email correspondence and telephone			
12/6/23	3.5	conversations with class members.	\$225	\$787.50	Natalie Cahoon
		Telephone calls with class members re:			
12/6/23	4.1	settlement.	\$550	\$2,255.00	Andrew Guzzo
		Correspondence with class member re:			
12/6/23	0.1	settlement.	\$225	\$22.50	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.3	settlement.	\$225	\$67.50	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.1	settlement.	\$225	\$22.50	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.2	settlement.	\$225	\$45.00	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.1	settlement.	\$225	\$22.50	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.2	settlement.	\$225	\$45.00	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.1	settlement.	\$225	\$22.50	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.1	settlement.	\$225	\$22.50	Ada Beltran
		Telephone calls with class members re:			
12/6/23	0.2	settlement.	\$225	\$45.00	Ada Beltran
12/5/23	4.5	Telephone calls with class members.	\$525	\$2,362.50	Casey Nash
		Correspondence with class members re:			
12/5/23	2.5	settlement.	\$225	\$562.50	Natalie Cahoon

	Telephone call with class members re:			
12/5/23	3.3 settlement.	\$550	\$1,815.00	Andrew Guzzo
	Telephone calls with class members re:			
12/5/23	0.5 settlement.	\$225	\$112.50	Ada Beltran
	Telephone calls with class members re:			
12/4/23	3.6 settlement.	\$225	\$810.00	Natalie Cahoon
	Telephone call with class members re:			
12/4/23	2.9 settlement.	\$550	\$1,595.00	Andrew Guzzo
	Conferences and correspondences re: class			
12/4/23	1.5 members.	\$550	\$825.00	Kristi Kelly
12/1/23	3.2 Telephone calls with class members.	\$550	\$1,760.00	Andrew Guzzo
	Correspondence with class members re			
12/1/23	2.8 settlement.	\$225	\$630.00	Natalie Cahoon
	Telephone calls with class members re:			
11/30/23	3.5 settlement.	\$550	\$1,925.00	Andrew Guzzo
	Telephone calls with class members re:			
11/29/23	1.9 settlement.	\$550	\$1,045.00	Andrew Guzzo
	Telephone calls with class members re:			
11/29/23	1.3 settlement.	\$225	\$292.50	Natalie Cahoon
	Telephone calls with class members re:			
11/28/23	2.3 settlement.	\$550	\$1,265.00	Andrew Guzzo
11/28/23	1.7 Conference with class members.	\$550	\$935.00	Kristi Kelly
	Telephone call with class members re:			
11/27/23	1.6 settlement.	\$550	\$880.00	Andrew Guzzo
	Correspondence with class members re			
11/27/23	1.5 settlement.	\$225	\$337.50	Natalie Cahoon
	Conferences and correspondences with			
11/27/23	2.8 class members.	\$550	\$1,540.00	Kristi Kelly
	Telephone calls with class members re:			
11/24/23	2.2 settlement.	\$550	\$1,210.00	Andrew Guzzo
	Telephone calls with class members re:			
11/22/23	2.4 settlement.	\$550	\$1,320.00	Andrew Guzzo
	Telephone calls with class members re:			
11/21/23	1.7 settlement.	\$550	\$935.00	Andrew Guzzo
11/21/23	5 Correspondence with class members.	\$225	\$1,125.00	Natalie Cahoon
	Telephone calls with class members re:			
11/20/23	2.9 settlement.	\$550	\$1,595.00	Andrew Guzzo
	Telephone calls with class members re:			
11/17/23	2.8 settlement.	\$550	\$1,540.00	Andrew Guzzo
11/17/23	0.3 Correspondence with class members.	\$225	\$67.50	Ada Beltran
11/17/23	0.3 Correspondence with class members.	\$225	\$67.50	Ada Beltran
11/17/23	0.3 Correspondence with class members.	\$225	\$67.50	Ada Beltran
11/17/23	0.3 Correspondence with class members.	\$225	\$67.50	Ada Beltran
	Telephone calls and emails with class			
11/17/23	1 members.	\$225	\$225.00	Natalie Cahoon
	Telephone calls with class members re:			
11/16/23	3.6 settlement.	\$550	\$1,980.00	Andrew Guzzo

11/16/23	0.7	Correspondence with class members. Conference and correspondences with class members and administrator;	\$225	\$157.50	Natalie Cahoon
11/16/23	2.5	Conference with co-counsel.	\$550	\$1,375.00	Kristi Kelly
11/16/23	0.1	Correspondence with class members.	\$225	\$22.50	Ada Beltran
11/16/23	0.1	Correspondence with class members.	\$225	\$22.50	Ada Beltran
11/16/23	0.1	Correspondence with class members.	\$225	\$22.50	Ada Beltran
11/15/23	2	Correspondence with class members. Review correspondence; Edit letter;	\$225	\$450.00	Natalie Cahoon
11/15/23	1	Conference with Mr. Guzzo.	\$550	\$550.00	Kristi Kelly
11/15/23	0.5	Correspondence with class members.	\$225	\$112.50	Ada Beltran
11/15/23	0.5	Correspondence with class members.	\$225	\$112.50	Ada Beltran
11/15/23	0.5	Correspondence with class members.	\$225	\$112.50	Ada Beltran
11/15/23	0.5	Correspondence with class members.	\$225	\$112.50	Ada Beltran
11/15/23	0.5	Correspondence with class members. Edit script; correspondence with class	\$225	\$112.50	Ada Beltran
11/14/23	1.5	members. Review class member emails; Conference	\$225	\$337.50	Natalie Cahoon
11/14/23	2.1	with Ms. Cahoon; Edit responses. Telephone call with class member re:	\$550	\$1,155.00	Kristi Kelly
11/13/23	0.2	settlement. Telephone call with class member re:	\$225	\$45.00	Ada Beltran
11/13/23	0.2	settlement. Telephone call with class member re:	\$225	\$45.00	Ada Beltran
11/13/23	0.2	settlement. Telephone call with class member re:	\$225	\$45.00	Ada Beltran
11/13/23	0.2	settlement. Telephone call with class member re:	\$225	\$45.00	Ada Beltran
11/13/23	0.2	settlement. Review of SA and approval documents for	\$225	\$45.00	Ada Beltran
11/13/23	4.8	addressing class member questions. Prepare telephone script; telephone call to	\$550	\$2,640.00	Andrew Guzzo
11/10/23	1	class member. Correspondences re: notices and class	\$225	\$225.00	Natalie Cahoon
11/3/23	0.6	member contacts. Review and edit final notices;	\$550	\$330.00	Kristi Kelly
10/13/23	0.6	Correspondence re: same. Conferences with co-counsel re: notices	\$550	\$330.00	Kristi Kelly
10/12/23	0.8	process and admin; correspondence re: same. Review and edit notices; correspondences	\$550	\$440.00	Kristi Kelly
10/11/23	1	with co-counsel.	\$550	\$550.00	Kristi Kelly
10/10/23	0.8	Correspondence with co-counsel. Review prelim approval; review edits to	\$550	\$440.00	Kristi Kelly
10/3/23	0.8	notice.	\$550	\$440.00	Kristi Kelly

	Correspondence with co-counsel; review				
10/2/23	0.6 PA Order.	\$550	\$330.00	Kristi Kelly	
9/27/23	0.5 Conference with Ms. Drake.	\$550	\$275.00	Kristi Kelly	
8/25/23	1 Review final agreement and pleading.	\$550	\$550.00	Kristi Kelly	
8/24/23	2.5 Edit PA papers.	\$525	\$1,312.50	Casey Nash	
8/17/23	1.5 Edit PA motion.	\$525	\$787.50	Casey Nash	
	Review and edit preliminary approval; edit				
8/17/23	1.8 declaration.	\$550	\$990.00	Kristi Kelly	
	Review final agreement and exhibits				
8/15/23	1.5 thereto.	\$550	\$825.00	Kristi Kelly	
8/15/23	1.5 Draft KCK PA declaration.	\$525	\$787.50	Casey Nash	
7/28/23	0.8 Review edits to agreement.	\$550	\$440.00	Kristi Kelly	
7/21/23	0.7 Review edits to SA.	\$550	\$385.00	Andrew Guzzo	
	Conference with co- and opposing counsel				
	re: settlement agreement and subpoena;				
7/5/23	1.5 review and edit the same.	\$550	\$825.00	Kristi Kelly	
	Review and provide edits to settlement				
7/3/23	1.4 agreement.	\$550	\$770.00	Kristi Kelly	
	Correspondence with Ms. Hanson;				
6/2/23	0.6 Conference with Ms. Drake.	\$550	\$330.00	Kristi Kelly	
5/23/23	0.5 Attend call with Rod Max.	\$550	\$275.00	Kristi Kelly	
5/10/23	0.2 Correspondence with co-counsel's office.	\$225	\$45.00	Natalie Cahoon	
4/18/23	0.3 Telephone call with Ms. Steinberg.	\$225	\$67.50	Natalie Cahoon	
4/17/23	0.5 Update file with Credco production.	\$225	\$112.50	Natalie Cahoon	
	Conference and correspondence with co-				
4/17/23	1 counsel re: term sheet and next steps.	\$550	\$550.00	Kristi Kelly	
3/30/23	0.3 Correspondence with Ms. Steinberg.	\$225	\$67.50	Natalie Cahoon	
	Prepare for and attend stay hearing;				
3/20/23	1 Conference with Mr. Raether.	\$550	\$550.00	Kristi Kelly	
3/10/23	0.2 Telephone call with Ms. Steinberg.	\$225	\$45.00	Natalie Cahoon	
	Review discovery documents;				
3/9/23	1.5 correspondence to co-counsel.	\$550	\$825.00	Kristi Kelly	
	Review stay motion; conference with Ms.				
3/8/23	0.5 Drake.	\$550	\$275.00	Kristi Kelly	
3/7/23	0.8 Correspondences re: MOU.	\$550	\$440.00	Kristi Kelly	
	Attend meet and confer with Freddie Mac;				
3/6/23	1.5 conference with co-counsel; edit MOU.	\$550	\$825.00	Kristi Kelly	
	Telephone call with Private Process Server				
	regarding a subpoena and prepare and				
3/6/23	0.5 update information for service.	\$225	\$112.50	Ada Beltran	
3/1/23	0.1 Prepare proof of service.	\$225	\$22.50	Ada Beltran	
	Review file and Private Process Server				
	notes and email Marston Agency regarding				
2/24/23	0.2 subpoena.	\$225	\$45.00	Ada Beltran	
2/24/23	0.5 Telephone call with Ms. Steinberg.	\$225	\$112.50	Natalie Cahoon	

	Conferences with co-counsel and counsel			
2/24/23	0.7 for Credco re: injunctive relief.	\$550	\$385.00	Kristi Kelly
2/21/23	0.9 call with Rod Max; call with co-counsel.	\$550	\$495.00	Andrew Guzzo
	Conferences with co-counsel; Conference			
2/21/23	1.7 with Mr. Max and opposing counsel.	\$550	\$935.00	Kristi Kelly
	Update and prepare subpoenas and			
	notices for service to Opposing Counsel			
2/17/23	1.6 and Private Process Service.	\$225	\$360.00	Ada Beltran
	Conference and correspondences with co-			
	and opposing counsel; research re: lending			
	regulations and underwriting guidelines;			
2/17/23	2 review correspondence from OC.	\$550	\$1,100.00	Kristi Kelly
	Prepare for and attend meet and confer			
	call; draft exhibit A's for subpoenas;			
2/16/23	2.8 correspondence to experts.	\$550	\$1,540.00	Kristi Kelly
2/13/23	0.3 Telephone call with Ms. Steinberg.	\$225	\$67.50	Natalie Cahoon
	Conference with counsel for Credco re:			
2/13/23	0.8 claims.	\$550	\$440.00	Kristi Kelly
2/7/23	0.6 Conference with counsel for Credco.	\$550	\$330.00	Kristi Kelly
	Research for potential experts on			
	underwriting; review FNMA and Freddie			
2/3/23	3 Mac guidelines.	\$550	\$1,650.00	Kristi Kelly
	Continue updating the Defendant's			
2/3/23	2.3 discovery chart.	\$225	\$517.50	Ada Beltran
2/2/23	1.2 Review documents produced.	\$550	\$660.00	Kristi Kelly
2/2/23	3.5 Continue updating the discovery chart.	\$225	\$787.50	Ada Beltran
2/2/23	1.7 Continue drafting and updating subpoenas.	\$225	\$382.50	Ada Beltran
	Draft Subpoenas for Deposition and			
2/1/23	3.3 Request for Documents.	\$225	\$742.50	Ada Beltran
2/1/23	0.6 Correspondence to Mr. St. George.	\$550	\$330.00	Kristi Kelly
1/30/23	1.5 Review Credco documents.	\$550	\$825.00	Kristi Kelly
1/27/23	7 Attend mediation.	\$550	\$3,850.00	Andrew Guzzo
1/27/23	6.5 Attend mediation.	\$525	\$3,412.50	Casey Nash
1/27/23	6.5 Attend mediation with Credco.	\$550	\$3,575.00	Kristi Kelly
	Draft, prepare and email notice of			
1/27/23	0.7 depositions to opposing counsel.	\$225	\$157.50	Ada Beltran
	Document review of CoreLogic's document			
1/26/23	2 production.	\$525	\$1,050.00	Casey Nash
1/26/23	1.5 Continue updating the discovery chart.	\$225	\$337.50	Ada Beltran
1/26/23	0.4 Prepare documents for experts review.	\$225	\$90.00	Ada Beltran
	Review of new discovery requests; prepare			
1/26/23	3.2 for mediation by review of documents.	\$550	\$1,760.00	Andrew Guzzo

1/26/23	Review Credco docs; review proposed 2.2 discovery.	\$550	\$1,210.00	Kristi Kelly
1/25/23	Continue updating the discovery 1.1 spreadsheet.	\$225	\$247.50	Ada Beltran
1/24/23	Review Credco's document production and 3.2 discovery responses.	\$550	\$1,760.00	Andrew Guzzo
1/24/23	Review documents from co-counsel; 0.4 update file; emails with team.	\$225	\$90.00	Natalie Cahoon
1/24/23	4.4 Continue updating the discovery chart.	\$225	\$990.00	Ada Beltran
1/23/23	2.1 Continue updating the discovery chart. Attend call with Mr. Raether; conference	\$225	\$472.50	Ada Beltran
1/23/23	1.8 with co-counsel. Review of discovery and documents for mediation and next steps; review of emails	\$550	\$990.00	Kristi Kelly
1/20/23	5.2 re: next steps.	\$550	\$2,860.00	Andrew Guzzo
1/20/23	3.4 Review Corelogic document production. Conferences and correspondences with co-	\$525	\$1,785.00	Casey Nash
1/20/23	1.5 counsel.	\$550	\$825.00	Kristi Kelly
1/20/23	6.5 Continue updating the discovery chart.	\$225	\$1,462.50	Ada Beltran
1/19/23	4.5 Review document production. Mediation call with Mr. Max; telephone	\$550	\$2,475.00	Andrew Guzzo
1/18/23	0.9 calls with Ms. Drake and Ms. Kelly.	\$550	\$495.00	Andrew Guzzo
1/18/23	0.3 Telephone call with mediator. Telephone call with co-counsel to discuss	\$525	\$157.50	Casey Nash
1/17/23	0.5 settlement memo and demand. Attend call with co-counsel; edit memo;	\$525	\$262.50	Casey Nash
1/17/23	1.8 conference with potential expert.	\$550	\$990.00	Kristi Kelly
1/13/23	1 Review and edit mediation memo.	\$550	\$550.00	Andrew Guzzo
1/13/23	0.6 Edit settlement memo.	\$550	\$330.00	Kristi Kelly
1/13/23	2.5 Edit Credco settlement memo.	\$525	\$1,312.50	Casey Nash
1/12/23	0.6 Edit mediation statement. Telephone call with co-counsel; legal research re: impact of deceased on credit application; attend calls with potential	\$525	\$315.00	Patrick McNichol
1/12/23	3.1 experts re: case	\$550	\$1,705.00	Andrew Guzzo
1/12/23	0.5 Update file with deceased articles.	\$225	\$112.50	Natalie Cahoon
1/12/23	2 Edit mediation statement. Attend call with two potential experts; conference with co-counsel; edit settlement memo; continue review of	\$525	\$1,050.00	Casey Nash
1/12/23	3.5 documents. Review documents; conferences with co-	\$550	\$1,925.00	Kristi Kelly
1/11/23	1.5 counsel.	\$550	\$825.00	Kristi Kelly
1/11/23	5 Draft settlement statement. Document review of CoreLogic's document	\$525	\$2,625.00	Casey Nash
1/10/23	2.5 production.	\$550	\$1,375.00	Andrew Guzzo

	Draft Credco settlement statement; review				
1/10/23	2.5 documents and case file.	\$525	\$1,312.50	Casey Nash	
1/10/23	2.5 Review document production.	\$550	\$1,375.00	Kristi Kelly	
	Attend call with OC; conference with co-				
1/9/23	1.5 counsel; review documents.	\$550	\$825.00	Kristi Kelly	
	Telephone Call with opposing counsel re:				
	mediation and discovery issues;				
1/9/23	1 conference with co-counsel.	\$525	\$525.00	Casey Nash	
1/6/23	1.5 Review of new discovery from Defendant.	\$550	\$825.00	Andrew Guzzo	
1/6/23	0.7 Correspondence with team.	\$225	\$157.50	Natalie Cahoon	
12/20/22	0.4 Telephone call with Ms. Steinberg.	\$225	\$90.00	Natalie Cahoon	
11/29/22	0.6 Attend call re: data.	\$550	\$330.00	Kristi Kelly	
11/17/22	0.8 Attend 16b; Prepare for the same.	\$550	\$440.00	Kristi Kelly	
11/11/22	0.4 Correspondences re: mediation dates.	\$550	\$220.00	Kristi Kelly	
	Update the Credco discovery documents				
11/4/22	1.3 chart.	\$225	\$292.50	Ada Beltran	
11/3/22	0.3 Telephone call with Ms. Steinberg.	\$225	\$67.50	Natalie Cahoon	
	Review files and create a discovery chart				
10/28/22	2.4 for Credco documents.	\$225	\$540.00	Ada Beltran	
	Conference with Mr. Raether;				
10/24/22	0.7 Correspondence to co-counsel.	\$550	\$385.00	Kristi Kelly	
10/13/22	1.3 Review document production.	\$550	\$715.00	Kristi Kelly	
10/12/22	0.5 Review of document production.	\$225	\$112.50	Natalie Cahoon	
10/12/22	1.2 Review documents produced by Credco.	\$550	\$660.00	Kristi Kelly	
10/11/22	0.3 Telephone call with Ms. Steinberg.	\$225	\$67.50	Natalie Cahoon	
	Conference with co-counsel; Review				
10/10/22	0.8 discovery production.	\$550	\$440.00	Kristi Kelly	
10/9/22	0.3 Finalize and serve supplemental responses.	\$225	\$67.50	Natalie Cahoon	
10/5/22	0.2 Telephone call with Ms. Steinberg.	\$225	\$45.00	Natalie Cahoon	
10/4/22	0.2 Telephone call with Ms. Steinberg.	\$225	\$45.00	Natalie Cahoon	
9/20/22	0.5 Attend Credco meet and confer.	\$550	\$275.00	Kristi Kelly	
	Finalize and serve Plaintiff's supplemental				
9/19/22	1 production.	\$225	\$225.00	Natalie Cahoon	
	Review CoreLogic meet and confer email;				
9/16/22	2 review responses and parts of production.	\$550	\$1,100.00	Kristi Kelly	
9/13/22	0.5 Conference with co-counsel.	\$550	\$275.00	Kristi Kelly	
9/9/22	0.7 Telephone call with Ms. Steinberg.	\$225	\$157.50	Natalie Cahoon	
	Conference with Ms. Cahoon; edit				
	supplemental discovery responses;				
	correspondence to opposing counsel re:				
9/7/22	0.7 MTC schedule and supplementation.	\$550	\$385.00	Kristi Kelly	
	Prepare supplemental ROG and RFP				
9/7/22	2.2 responses; review all documents.	\$225	\$495.00	Natalie Cahoon	

9/6/22	0.3	Review of file re Credco supplementation. Attend meet and confer with Credco; conference with Mr. Raether; correspondence with co-counsel;	\$225	\$67.50	Natalie Cahoon
9/6/22	1.3	correspondence with Ms. Cahoon.	\$550	\$715.00	Kristi Kelly
8/29/22	0.2	Telephone call with Ms. Steinberg.	\$225	\$45.00	Natalie Cahoon
8/29/22	0.6	Conference with co-counsel.	\$550	\$330.00	Kristi Kelly
8/29/22	0.5	Conference with co-counsel.	\$525	\$262.50	Casey Nash
8/25/22	1	Attend settlement conference and CMC.	\$525	\$525.00	Casey Nash
8/25/22	0.6	Conference with Ms. Drake. Conference with Mr. Raether; prepare for	\$550	\$330.00	Kristi Kelly
8/24/22	0.8	CMC/ENE; correspondence re: same.	\$550	\$440.00	Kristi Kelly
8/19/22	0.4	Correspondence with Ms. Steinberg.	\$225	\$90.00	Natalie Cahoon
8/15/22	0.5	Edit ENE.	\$550	\$275.00	Kristi Kelly
8/12/22	1.5	Conference with OC re: data; review and edit ENE; correspondence with co-counsel.	\$550	\$825.00	Kristi Kelly
8/11/22	1.4	Draft ENE statement Edit case management order and	\$525	\$735.00	Patrick McNichol
8/10/22	0.6	correspond about the same.	\$525	\$315.00	Patrick McNichol
8/10/22	1	Review final discovery responses. Correspondence with OC and co-counsel re: search terms, discovery and CMC; edit the same; conference with Mr. McNichol;	\$550	\$550.00	Andrew Guzzo
8/10/22	1.7	review final discovery. Prepare production; edit discovery	\$550	\$935.00	Kristi Kelly
8/10/22	4.3	responses; finalize; serve	\$225	\$967.50	Natalie Cahoon
8/9/22	1.1	Revise discovery responses.	\$525	\$577.50	Patrick McNichol
8/9/22	2.1	Edit discovery responses.	\$550	\$1,155.00	Andrew Guzzo
8/9/22	5.7	Edit discovery responses. Review and edit discovery responses; review search terms; review discovery	\$225	\$1,282.50	Natalie Cahoon
8/9/22	2.2	plan; correspondence to co-counsel.	\$550	\$1,210.00	Kristi Kelly
8/8/22	5.4	Draft discovery responses. Edit discovery requests; prepare letter to	\$550	\$2,970.00	Andrew Guzzo
8/8/22	5	Steinberg.	\$225	\$1,125.00	Natalie Cahoon
8/8/22	1	Edit discovery responses.	\$550	\$550.00	Kristi Kelly
8/7/22	1.6	Edit discovery responses.	\$550	\$880.00	Andrew Guzzo
8/5/22	5.2	Draft Credco discovery responses.	\$225	\$1,170.00	Natalie Cahoon
8/4/22	3.3	Draft Discovery Responses to Credco. Edit formatting for discovery responses	\$225	\$742.50	Natalie Cahoon
8/3/22	1	Credco.	\$225	\$225.00	Natalie Cahoon
6/21/22	0.4	Edit initial disclosures.	\$550	\$220.00	Kristi Kelly
6/21/22	1.1	Draft Initial Disclosures.	\$225	\$247.50	Natalie Cahoon
6/14/22	0.5	Correspondence with Ms. Steinberg.	\$225	\$112.50	Ada Beltran

	Review Corelogic discovery requests; edit letter to Ms. Steinberg; correspondence			
6/14/22	0.7 with team.	\$225	\$157.50	Natalie Cahoon
6/13/22	1.3 Correspondence with Ms. Steinberg.	\$225	\$292.50	Ada Beltran
	Attend 26f; review and edit discovery;			
6/10/22	0.8 send summary of 26f.	\$550	\$440.00	Kristi Kelly
	Draft joint discovery plan and letter for Ms.			
6/9/22	3.3 Kelly's review.	\$225	\$742.50	Ada Beltran
	File PHV for CSN and KCK; telephone call			
5/26/22	0.4 with Court re same.	\$225	\$90.00	Natalie Cahoon
	Review CA SD rules; register CSN and KCK			
5/25/22	1 for ECF.	\$225	\$225.00	Natalie Cahoon
	Prepare Pro Hac Vice applications for Ms.			
5/25/22	0.7 Kelly and Ms. Nash.	\$225	\$157.50	Ada Beltran
2/3/22	0.7 Edit CoreLogic complaint.	\$525	\$367.50	Patrick McNichol
2/3/22	0.5 Telephone call with Ms. Steinberg.	\$225	\$112.50	Natalie Cahoon
	Draft Complaint, edit the same, and			
2/1/22	1.8 correspond with co-counsel.	\$525	\$945.00	Patrick McNichol
	Conference with Ms. Steinberg;			
	conference with Mr. McNichol; edit Credco			
2/1/22	2 complaint.	\$550	\$1,100.00	Kristi Kelly
	Review documents; case planning call with			
1/31/22	1 co-counsel.	\$550	\$550.00	Kristi Kelly
1/10/22	0.7 Telephone call with Ms. Steinberg.	\$225	\$157.50	Natalie Cahoon
TOTAL	385.1		\$171,607.50	