

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FRANTZ SAMSON, a Washington resident,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

NOTED FOR HEARING:
JUNE 20, 2025

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I. INTRODUCTION

This TCPA class action settled three months before the parties were scheduled to go to trial. The litigation was fierce. Although the parties engaged in mediation three times earlier in the case, settlement negotiations were not productive. Instead, United lodged an aggressive defense. Samson and Class Counsel responded to nine sets of discovery requests; reviewed over 120,000 pages of documents, including tens of thousands of call recordings United produced after the classes were certified; took eleven depositions of United employees and expert; and hired two experts, who together produced five reports, three declarations, and sat for depositions. The parties together briefed eight pre-trial motions, including two class certification motions. When the parties settled, United's motions to decertify the class and to exclude Samson's experts were nearly fully briefed and the parties were preparing to brief dispositive motions and for trial.

The non-reversionary settlement provides significant cash awards for Settlement Class Members that, depending on the claims rate, will pay claimants a substantial portion (if not all) of the statutory damages they would receive had the case proceeded to trial. To compensate them for their efforts, Class Counsel request a fee award of 33.33% of the \$2.5 million Settlement Fund, or \$833,333, which recognizes the excellent result they obtained for the Settlement Class given the risks they faced at trial and their high-quality work. This amount is 24% of their \$3,533,234.50 total lodestar.

Class Counsel also respectfully request reimbursement of \$417,003 in litigation costs, and that the Court approve a service award to Plaintiff in the amount of \$20,000 for his work on behalf of the Settlement Class. Samson has actively participated in this action since its inception six years ago. He responded to written discovery requests, assisted in counsel's investigation, sat for deposition, attended mediation, and was ready to testify at trial. A service award of \$20,000 for his efforts is reasonable and appropriate.

II. BACKGROUND

A. Samson and Class Counsel dedicated substantial time and resources to this case.

Samson filed this case in January 2019, alleging that United violated the TCPA by placing non-emergency prerecorded calls without prior express consent. Dkt. 1.

United's intent to vigorously defend against these claims was evident when, two weeks after answering the complaint, United moved for a stay until the FCC weighed in on the meaning of the term "autodialer" and whether a company violates the TCPA when it calls a reassigned number relying on consent from the number's prior owner. Dkt. 34, 35. The Court denied the motion, agreeing with Samson that neither issue was a matter of first impression or outside the court's competence to decide. Dkt. 41.

Discovery was hard fought. Samson served six sets of discovery requests and responded to nine. Murray Fee Decl. ¶9. Obtaining necessary discovery from United required numerous meet and confers. Ultimately, United produced over 120,000 pages of documents, including over 1,000 from its expert, 117,000 call recordings, and hundreds of data files. *Id.* ¶10. Samson was deposed by United and took 10 depositions of United employees. *Id.* ¶11. Samson's two experts produced five reports and three declarations and were deposed by United. United's two experts produced two reports and two declarations and Samson deposed them. *Id.* ¶13.

In 2020, the parties mediated twice with experienced class action mediator Lou Peterson, but did not resolve the case. Dkt. 72.

In April 2020, United filed a second motion to stay based on the Supreme Court's anticipated determination of the constitutionality of the TCPA's cell phone restriction, arguing that, alternatively, the Court should dismiss, transfer or stay the case under the first-to-file rule. Dkt. 75. While that motion was pending, Samson moved for class certification. Dkt. 94-100, 130-139. United opposed and filed a sur-reply. Dkt. 112-127, 143.

In July 2020, the Court granted United's motion to stay under the first-to-file doctrine pending resolution of cases filed in the Eastern District of California. Dkt. 153.

1 In September 2022, the case was reassigned and this Court ordered the parties brief
2 whether the stay should remain in place and then agreed with Samson that the stay should be
3 lifted. Dkt. 166-171.

4 Samson filed a renewed motion for class certification. Dkt. 172-178. United countered
5 with a renewed motion to dismiss under the first-to-file rule, which Samson opposed and the
6 Court denied. Dkt. 181-182, 189, 239. After the motion was fully briefed, the parties held a third
7 mediation with Mr. Peterson and again the case did not settle. Dkt. 259. The Court then granted
8 the class certification motion after a lengthy hearing, certifying Wrong Number and DNC
9 Classes. Dkt. 191-218, 226-230, 234, 261, 266. United filed a Rule 23(f) petition asking the
10 Ninth Circuit for permission to appeal the class certification order, which Samson opposed and
11 the Ninth Circuit denied. Dkt. 282.

12 The parties filed a joint submission regarding the notice plan, in which Samson proposed
13 to subpoena wireless carriers to identify subscribers of numbers on the class list, use a reverse
14 lookup process to identify class members, and send direct notice supplemented with targeted
15 online ads; United argued the class list was overbroad and proposed a schedule for briefing
16 disputes. Dkt. 272-273. Soon after, United moved to dismiss the claims of non-Washington class
17 members for lack of personal jurisdiction, which Samson successfully opposed. Dkt. 277, 278,
18 294-295.

19 Samson served subpoenas on wireless providers, moving to enforce them as needed. *See*,
20 *e.g.*, Dkt. 288, 293, 299. The parties continued to dispute the process and plan for notifying class
21 members of the Court's certification order, but agreed to certain discovery. *See, e.g.*, Dkt. 302,
22 305. Among other things, United produced tens of thousands of call recordings and identified
23 new potential trial witnesses, and Samson deposed those witnesses and two additional United
24 employees. Dkt. 331 ¶¶ 2-3. Samson's expert analyzed the data from the wireless carriers, the
25 reverse lookup results, and United's post-certification productions to compile a list of potential
26 class members for notice. *Id.* ¶¶ 4-7.

1 United moved to decertify the Classes based largely on call recordings it produced after
 2 the certification order. Dkt. 311. After reviewing the call recordings Samson agreed that the
 3 DNC Class should be decertified but opposed decertification of the Wrong Number Class and
 4 produced an updated list of its potential members. Dkt. 330-333.

5 The parties then re-opened settlement discussions again with the assistance of Mr.
 6 Peterson. After several weeks the parties negotiated the proposed settlement.

7 **B. Class Counsel negotiated an excellent settlement for the Settlement Class.**

8 United will pay \$2.5 million to resolve class members' claims. The non-reversionary
 9 Settlement Fund will pay Court-approved attorneys' fees and costs, a service award to Samson,
 10 and settlement administration costs. If the requested amounts are approved, the balance—
 11 approximately \$1,194,664—will be paid to class members who submit valid claims.

12 There are 12,012 telephone numbers on the class list. The net fund is sufficient to pay
 13 every class member an award of over \$99. Class Counsel do not expect every class member to
 14 make a claim. If 10% of the class submit claims, the estimated payment will be over \$994
 15 (\$1,194,664/12,01 = \$994.72).

16 **III. ARGUMENT**

17 **A. A fee award of one third of the Settlement Fund is reasonable and appropriate.**

18 “[A] lawyer who recovers a common fund for the benefit of persons other than himself or
 19 his client is entitled to a reasonable attorney’s fee from the fund as a whole.” *Boeing Co. v. Van*
 20 *Gemert*, 444 U.S. 472, 478 (1980). The “common fund” doctrine “rests on the perception that
 21 persons who obtain the benefit of a lawsuit without contributing to its cost are unjustly enriched
 22 at the successful litigant’s expense.” *Id.* The court can “prevent this inequity by assessing
 23 attorney’s fees against the entire fund, thus spreading fees proportionately among those benefited
 24 by the suit.” *Id.*

25 Courts may award fees from a common fund using the percentage-of-the-fund or the
 26 lodestar method. *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1047 (9th Cir. 2002).
 27 “Reasonableness is the goal, and mechanical or formulaic application of either method, where it

yields an unreasonable result, can be an abuse of discretion.” *In re Coordinated Pretrial Proceedings in Petroleum Prods. Antitrust Litig.*, 109 F.3d 602, 607 (9th Cir. 1997).

The percentage-of-the-fund method is appropriate for determining a reasonable fee in this case. Courts use this method when, as here, the benefit to the class is easily quantified. *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 942 (9th Cir. 2011).

B. An upward adjustment of the 25% benchmark is appropriate.

The Ninth Circuit instructs that “[t]he 25% benchmark, although a starting point for analysis, may be inappropriate in some cases.” *Vizcaino*, 290 F.3d at 1047. The “benchmark percentage should be adjusted, or replaced by a lodestar calculation, when special circumstances indicate that the percentage recovery would be either too small or too large in light of the hours devoted to the case or other relevant factors.” *Six Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301, 1311 (9th Cir. 1990). The Ninth Circuit has identified relevant factors for determining whether the requested fee is reasonable under the “circumstances of the case”: (1) the results achieved; (2) the risk of continued litigation; (3) the skill required and quality of work; (4) the contingent nature of the fee and financial burden carried by the plaintiff; and (5) awards in similar cases. *Vizcaino*, 290 F.3d at 1048-50. Courts may also consider a lodestar cross-check. *Id.* at 1050.

These factors support the requested fee. Moreover, courts recognize a settlement fund under \$10 million will “often result in fees above 25%.” *Craft v. County of San Bernardino*, 624 F. Supp. 2d 1113, 1127 (C.D. Cal. 2008); *see also Alvarez v. Farmers Ins. Exch.*, 2017 WL 2214585, at *3 (N.D. Cal. Jan. 18, 2017) (citing cases). This is not a “mega fund” case that would result in a windfall for Class Counsel. *Bluetooth*, 654 F.3d at 942.

1. Class Counsel achieved an excellent settlement for the Settlement Class.

“The touchstone for determining the reasonableness of attorneys’ fees in a class action is the benefit to the class.” *Lowery v. Rhapsody Int’l*, 75 F.4th 985, 988 (9th Cir. 2023). Class Counsel negotiated a settlement that will significantly benefit the class. The estimated payments of \$350 to \$1,000 far exceed similar settlements approved by other courts, including many in this

circuit. *See Rinky Dink, Inc. v. World Bus. Lenders, LLC*, 2016 WL 3087073, at *3 (W.D. Wash. May 31, 2016) (approving \$150-per-claimant settlement); *Franklin v. Wells Fargo Bank, N.A.*, 2016 WL 402249, at *3 (S.D. Cal. Jan. 29, 2016) (\$71.16 per claimant); *Estrada v. iYogi*, 2015 WL 5895942, at *7 (E.D. Cal. Oct. 6, 2015) (\$40); *Couser v. Comenity Bank*, 125 F. Supp. 3d 1034, 1043 (S.D. Cal. 2015) (approximately \$13.75 per claimant); *Arthur v. Sallie Mae, Inc.*, 2012 WL 4075238, at *1 (W.D. Wash. Sept. 17, 2012) (approximately \$100 per claimant).

The estimated payments represent a substantial portion of class members' maximum recovery of \$500 to \$1,500 per call if they prevailed at trial. 47 U.S.C. § 227(b)(3); *see also Carlin v. DairyAmerica*, 380 F. Supp. 3d 998, 1022 (E.D. Cal. 2019) (awarding fee of one-third of settlement fund due in part to "the highly favorable terms for class members"—48% of estimated damages—and citing cases with recoveries of 32-35% of damages and similar fees).

2. The settlement is particularly favorable given the risks of continued litigation.

"Risk is a relevant circumstance." *Carlin*, 380 F. Supp. 3d at 1020 (citing *Vizcaino*, 290 F.3d at 1048). The \$2.5 million Settlement Fund reflects the risks Samson faces in overcoming United's contention that it is impossible to determine on a class wide basis whether United called wrong numbers. United produced thousands of call recordings that it said showed conclusively that its electronic records could not be relied on. Samson's expert anticipated this argument and devised a methodology that relied on multiple sources of data, but United moved to exclude her analysis and to decertify the class. United also contended that exceptions to the TCPA absolved United of any liability. Dkt. 266. Samson faced risk that, even if the Court denied the motions to decertify and to exclude his expert, he would eventually lose on the merits.

Samson acknowledges the risk of trial and appeals, which could delay any benefit to the class for years. That is especially true because TCPA jurisprudence continues to evolve and United has a history of dedicating substantial resources to trying to convince regulators and courts to carve out exceptions for its calls. Courts recognize that it may be "proper to take the bird in hand instead of a prospective flock in the bush." *Nat'l Rural Telecommc'ns Coop. v. DirecTV*, 221 F.R.D. 523, 526 (C.D. Cal. 2004).

3. Class Counsel demonstrated skill and experience with high-quality work.

“The ‘prosecution and management of a complex national class action requires unique legal skills and abilities.’” *In re Omnivision Techs.*, 559 F. Supp. 2d 1036, 1047 (N.D. Cal. Jan. 9, 2008) (citation omitted). Class Counsel litigated this case efficiently because of their experience successfully prosecuting dozens of TCPA class actions. Murray ¶¶16-30, Exs. 2-3. Class Counsel knew to quickly secure calling records, and served early targeted discovery on United to focus on key disputed issues. *Id.* ¶9. Class Counsel took several early depositions focused on United’s policies and procedures. These depositions provided invaluable insight into United’s business practices that Samson used in support of class certification. *Id.*

Class Counsel achieved this relief despite the vigorous opposition of proficient defense counsel, who aggressively filed multiple motions on a variety of topics. *Destefano v. Zynga*, 2016 WL 537946, at *17 (N.D. Cal. Feb. 11, 2016) (“The quality of opposing counsel is also relevant to the quality and skill that class counsel provided.”); *Lofton v. Verizon Wireless*, 2016 WL 7985253, at *1 (N.D. Cal. May 27, 2016) (the “risks of class litigation against an able defendant well able to defend itself vigorously” support upward adjustment).

4. Class Counsel assumed significant risk of no recovery.

Class Counsel’s fee request reflects that they litigated this case on a contingency basis and risked recovering no fees. *In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 954-55 (9th Cir. 2015); *Jenson v. First Tr. Corp.*, 2008 WL 11338161, at *12 (C.D. Cal. June 9, 2008) (“Uncertainty that any recovery ultimately would be obtained is a highly relevant consideration. Indeed, the risks assumed by Counsel, particularly the risk of non-payment or reimbursement of expenses, is important to determining a proper fee award.”).

Class Counsel assumed significant burdens in pursuing this case on a contingent basis. For example, Class Counsel advanced costs for expert reports in 2020 and shouldered that expense ever since. Class Counsel also turned down other opportunities to effectively manage this case. Murray ¶31, Exs. 2-3. “With respect to the contingent nature of the litigation ... courts

1 tend to find above-market-value fee awards more appropriate in this context given the need to
 2 encourage counsel to take on contingency-fee cases for plaintiffs who otherwise could not afford
 3 to pay hourly fees.” *Destefano*, 2016 WL 537946, at *18. “This is especially true where, as here,
 4 class counsel has significant experience in the particular type of litigation at issue; indeed, in
 5 such contexts, courts have awarded an even higher 33 percent fee award.” *Id.*; *see also Rabin v.*
 6 *PricewaterhouseCoopers*, 2021 WL 837626, at *8 (N.D. Cal. Feb. 4, 2021) (noting “the
 7 attorney’s fee award should take into account the risk of representing Plaintiffs on a contingency
 8 basis over a period of four years of litigation” and awarding fee of 35% of settlement fund).

9 5. Fee awards in similar cases support the request.

10 Courts in this circuit have observed that “fee awards of approximately 33⅓% are typical
 11 for settlements up to \$10 million.” *Zamora v. Lyft*, 2018 WL 4657308, at *3 (N.D. Cal. Sept. 26,
 12 2018); *see also Alvarez*, 2017 WL 2214585, at *3 (citing cases). Courts also adjust the
 13 benchmark upward where, as here, the settlement is a favorable result for the class and class
 14 counsel made a significant investment of time and resources, resulting in a lodestar that is less
 15 than the requested fee. *See Schmitt v. Kaiser Found. Health Plan of Wash.*, 2024 WL 1676754, at
 16 *4-5 (W.D. Wash. Apr. 18, 2024) (awarding one third of settlement fund that “provides a
 17 substantial monetary benefit for the Class” where “counsel undertook a significant risk in
 18 bringing this class action lawsuit on a contingent basis” since it was complex and “heavily
 19 litigated” for several years); *DiMercurio v. Equilon Enterprises*, 2024 WL 2113857, at *9 (N.D.
 20 Cal. May 9, 2024) (awarding one-third of settlement fund under \$10 million where counsel
 21 “achieved substantial results”); *Randall v. Integrated Commc’n Servs.*, No.3:20-cv-05438-DGE,
 22 Dkt.136 (W.D. Wash. Mar. 29, 2024) (awarding one third of settlement fund); *Mannacio v.*
 23 *Sovereign Lending Group*, No.3:22-cv-05498-TMC, Dkt.77 (W.D. Wash. Mar. 1, 2024)
 24 (awarding one third of settlement fund in TCPA case); *Scott v. Blackstone Consulting*, 2024 WL
 25 271439, at *11 (S.D. Cal. Jan. 24, 2024) (awarding one third of settlement amount); *Suarez v.*
 26 *Bank of America*, 2024 WL 150721, at *3 (N.D. Cal. Jan. 11, 2024) (awarding one third of
 27 settlement fund because “[c]ounsel obtained excellent benefits for the class despite a vigorous

and skillful defense” and risks of litigation); *Reed v. Balfour Beatty Rail*, 2023 WL 4680922, at *7 (C.D. Cal. June 22, 2023) (awarding 33% of settlement fund, citing “superior result,” counsel’s experience, and contingent nature of fee); *Soto v. O.C. Commc’ns*, 2019 WL 13151723, at *3 (N.D. Cal. Oct. 23, 2019) (approving fee award of one-third of \$7.5 million settlement fund); *see also Hallman v. Wells Fargo Bank*, 2021 WL 9567171, at *2 (W.D. Wash. June 10, 2021) (“The fee award, which is one-third of the Gross Fund Value, is reasonable under both the percentage-of-the-fund method and a lodestar cross-check, particularly in light of the substantial time and resources Class Counsel devoted to this risky multi-year litigation on a contingency basis, and in light of the extraordinary results obtained through the Settlement.”).

6. A lodestar crosscheck supports the request.

While not required, a lodestar crosscheck supports the requested fee. *See Farrell v. Bank of America*, 827 F. App’x 628, 630 (9th Cir. 2020) (“This Court has consistently refused to adopt a crosscheck requirement, and we do so once more.”); *Vizcaino*, 290 F.3d at 1050 & n.5 (when the “primary basis of the fee award remains the percentage method,” a lodestar analysis “may” be useful but is “merely a cross check”). Courts first calculate the lodestar by multiplying the number of hours reasonably expended by a reasonable rate, and then consider adjusting the lodestar to account for several factors, such as the benefit obtained for the class, risk of nonpayment, complexity and novelty of the issues presented, and awards in similar cases. *Bluetooth*, 654 F.3d at 941-42.

Class Counsel’s combined lodestar of \$3,533,234.50—which, as discussed below, is based on reasonable rates and a reasonable number of hours—represents a “negative” multiplier of approximately 0.24. “A negative multiple strongly suggests the reasonableness of a negotiated fee.” *DiMercurio*, 2024 WL 2113857, at *10.

a. *Class Counsel’s hourly rates are reasonable.*

In determining a reasonable hourly rate, courts look to the prevailing market rates in the forum in which the district court sits. *Gonzalez v. City of Maywood*, 729 F.3d 1196, 1205 (9th Cir. 2013). Class Counsel calculated their lodestar at rates of \$745-\$1050 for attorneys with at

1 least 25 years of experience, \$600-\$725 for attorneys with at least 15 years of experience, and
 2 \$250-\$500 for contract and less-experienced attorneys. Murray ¶34 & Exs. 1-3. These rates are
 3 “reasonable and comparable to the fees generally charged by attorneys with similar experience,
 4 ability, and reputation for work on similar matters in this judicial district.” *Rivas v. BG Retail*,
 5 2020 WL 264401 (N.D. Cal. Jan 16, 2020); *see also Knudsen v. Hightower Holdings*, 2024 WL
 6 3430994, at *3 (W.D. Wash. July 16, 2024) (\$450 to \$850 reasonable for Seattle); *Promedev v.*
 7 *Wilson*, 2024 WL 3043415, at *6 (W.D. Wash. June 18, 2024) (\$850 reasonable for Seattle
 8 partner); *Koonwaiyou v. Blinken*, 2024 WL 1193111, at *9 (W.D. Wash. Mar. 20, 2024)
 9 (approving \$850 rate for experienced Seattle lawyer); *Schmitt*, 2024 WL 1676754, at *5
 10 (approving rates from \$695 to \$750 as set forth in Dkt.176 ¶3); *Randall v. Integrated Commc’n*
 11 *Servs.*, No. 3:20-cv-05438-DGE, Dkt.135 (W.D. Wash. Mar. 29, 2024) (awarding one-third of
 12 settlement fund where lodestar cross-check based on rates from \$680 to \$1295 as set forth in
 13 Dkt.121-1); *Stedman v. Progressive Ins.*, 2024 WL 248094, at *1 (W.D. Wash. Jan. 23, 2024)
 14 (awarding one third of settlement fund after approving rates from \$120 to \$850 for staff and
 15 attorneys, as set forth in Dkt.131 at 14); *Amazon.com v. Wong*, 2022 WL 1092518, at *2 (W.D.
 16 Wash. Apr. 12, 2022) (approving rates “from \$535 to \$785 for attorneys and \$215 for
 17 paralegals”); *Brazile v. Comm’r of Soc. Sec.*, 2022 WL 503779, at *3 (W.D. Wash. Feb. 18,
 18 2022) (noting “fee awards with hourly rates exceeding \$1,000 have been approved by courts in
 19 this district on numerous occasions,” and citing cases); *Allstate Indem. Co. v. Lindquist*, 2021
 20 WL 4226155, at *3 (W.D. Wash. Sept. 16, 2021) (approving \$300 for legal assistants).

21 Class Counsel’s declarations describe the basis for their hourly rates, including their
 22 education, experience, and reputation in the legal community. Courts have found these rates to
 23 be reasonable. Murray ¶36; *see also Welch v. Metro. Life Ins.*, 480 F.3d 942, 947 (9th Cir. 2007)
 24 (affidavits from plaintiffs’ counsel and fee awards in other cases sufficient evidence of prevailing
 25 market rates); *Ingram v. Oroudjian*, 647 F.3d 925, 928 (9th Cir. 2011) (courts may rely on their
 26 familiarity with the legal market in determining reasonable hourly rates).

1 The requested award of \$833,333 divided by the over 6,140 hours worked results in an
 2 effective hourly rate of \$135.72 for all work done. This is far below the rates ordinarily charged
 3 by Class Counsel and other attorneys of comparable skill in the community.

4 *b. Class Counsel spent a reasonable number of hours litigating the case.*

5 This case spanned nearly six years and required substantial effort, particularly given the
 6 tenacious defense by United's counsel. Obtaining calling records, deposing key witnesses,
 7 multiple rounds of class certification briefing, and reviewing tens of thousands of belatedly-
 8 produced call recordings were particularly intensive aspects of this case. In all, Class Counsel
 9 dedicated 6,140.2 hours to the case. This total excludes time Class Counsel removed as
 10 administrative or arguably inefficient or duplicative. Class Counsel will spend additional hours
 11 seeing the case through to final resolution, including moving for final approval, attending the
 12 hearing, and ensuring the claims process is properly carried out.

13 **C. Class Counsel's litigation costs should be reimbursed.**

14 Attorneys who create a common fund are entitled to reimbursement of their out-of-pocket
 15 expenses so long as they are reasonable, necessary and directly related to the work performed for
 16 the class. *Vincent v. Hughes Air W.*, 557 F.2d 759, 769 (9th Cir. 1977); *In re High-Tech Emp.*
 17 *Antitrust Litig.*, 2015 WL 5158730, at *16 (N.D. Cal. Sept. 2, 2015) (awarding costs for expert
 18 witness fees, mediation fees, document management and review, court reporting and
 19 videographer, electronic research, copying, mailing, and serving documents, and travel); *see also*
 20 Fed. R. Civ. P. 23(h). Class Counsel's declarations provide their litigation costs by category,
 21 including over \$302,000 for expert work essential to proving United's liability and identifying
 22 class members, totaling \$417,033. Murray ¶37 & Exs. 2-3.

23 **D. A \$20,000 service award is appropriate.**

24 Service awards "are fairly typical in class action cases." *Rodriguez v. W. Publishing*, 563
 25 F.3d 948, 958-59 (9th Cir. 2009). They recognize class representatives' efforts and financial or
 26 reputational risk they undertake, and their willingness to act as private attorneys general. *Id.*; *see*
 27 *also Grey Fox v. Plains All-Am. Pipeline*, 2024 WL 4267431, at *6 (C.D. Cal. Sept. 17, 2024)

1 (“Courts have discretion to approve service awards based on the amount of time and effort spent,
 2 the duration of the litigation, and the personal benefit (or lack thereof) as a result of the
 3 litigation.” (citation omitted)).

4 Samson contributed significantly to the success of this litigation by serving as the sole
 5 representative of the class. Samson responded to nine sets of discovery, including intrusive
 6 requests for personal information about criminal convictions, “current or prospective landlord-
 7 tenant relationships”, and lease applications. Samson Decl. ¶5-6. Samson took time off work to
 8 sit for deposition and to attend mediation in person. *Id.* ¶6; Murray Fee Decl. ¶42. Samson
 9 regularly communicated with counsel about case status and strategy. A \$20,000 service award,
 10 which amounts to less than 1% of the common fund he helped create, is appropriate. *See Grey*
 11 *Fox*, 2024 WL 4267431, at *6-7 (approving \$20,000 service awards to representatives who sat
 12 for depositions, responded to discovery, and supplied information to counsel); *In re Nat’l*
 13 *Collegiate Athletic Ass’n*, 2017 WL 6040065, at *11 (N.D. Cal. Dec. 6, 2017) (approving
 14 \$20,000 service awards and collecting cases approving similar awards); *Garner v. State Farm*
 15 *Mut. Auto. Ins.*, 2010 WL 1687832, at *17 n. 8 (N.D. Cal. Apr. 22, 2010) (“Numerous courts in
 16 the Ninth Circuit and elsewhere have approved incentive awards of \$20,000 or more where, as
 17 here, the class representative has demonstrated a strong commitment to the class.”).

18 IV. CONCLUSION

19 Samson and Class Counsel respectfully request the Court grant their motion.

20 RESPECTFULLY SUBMITTED AND DATED this 14th day of March, 2025.

21 TERRELL MARSHALL LAW GROUP PLLC

22 I certify that this memorandum contains 4,200
 23 words, in compliance with the Local Civil Rules.

24 By: /s/ Jennifer Rust Murray #36983

Beth E. Terrell, WSBA #26759

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23 Conshohocken, Pennsylvania 19428
24 Telephone: (610) 477-8380

25 *Class Counsel*
26
27

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FRANTZ SAMSON, a Washington resident,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**DECLARATION OF JENNIFER
RUST MURRAY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

I, Jennifer Rust Murray, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC and co-counsel of record for Plaintiff in this matter. I am admitted to practice before this Court and am a member in good standing of the bars of the states of Washington and Oregon. I respectfully submit this declaration in support of Plaintiff's Motion for Attorneys Fees and Costs. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

A. Terrell Marshall's Work on this Case.

2. Terrell Marshall was involved in every aspect of this case, in addition to serving as local counsel with responsibility for filings, communicating with the Court, and remaining responsible for the overall litigation.

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1 3. Terrell Marshall attorneys and staff worked closely with the other legal team
2 members on case strategy and management. Among other things, Terrell Marshall brought its
3 experience with class actions, Telephone Consumer Protection Act cases, and local practice.

4 4. Terrell Marshall attorneys participated in investigating the facts and developing
5 the legal claims, as well as drafting the initial and amended complaints.

6 5. Terrell Marshall played a key role in discovery, including overall strategy and
7 implementation of that strategy. We took the lead on or significantly contributed to drafting
8 discovery requests to United and subpoenas to third parties, conferring with United's counsel and
9 counsel for third parties, reviewing documents, and preparing for depositions.

10 6. Terrell Marshall also worked with Plaintiff Samson on responding to multiple sets
11 of discovery, locating and producing documents, and preparing for his deposition.

12 7. Terrell Marshall attorneys took the lead on or significantly contributed to every
13 brief filed in this case.

14 8. I attended all of the hearings in this case and I argued the renewed motion for
15 class certification.

16 9. Both parties took extensive discovery. Plaintiff served early targeted written
17 discovery on United to identify and focus on the key disputed issues and to obtain essential
18 calling records. Plaintiff Samson served six sets of discovery requests and responded to nine.
19 Numerous disputes required the parties to meet and confer about the scope of requests and
20 sufficiency of responses. We also knew to take early depositions of United managers. These
21 depositions provided invaluable insight into United's business practices that we used in support
22 of class certification.

23 10. At the end of the day, United produced over 120,000 pages of documents,
24 including over 1,000 from its expert, over 117,000 call recordings, and hundreds of excel
25 spreadsheets and data files.

26
27
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11. The parties took fourteen depositions, including Samson's deposition, nine depositions of United representatives, and four expert depositions.

12. Plaintiff's counsel dedicated approximately 675 hours to processing, reviewing, and analyzing the call recordings that United produced after the Court certified the Classes.

13. The parties retained multiple experts. Samson's two experts produced a total of five reports and three declarations. United's two experts produced two reports and two declarations. The experts' work reveals that the majority of class members—nearly 60%—received only one violation call.

14. The parties mediated three times with well-respected mediator Lou Peterson, but were unsuccessful. After Plaintiff responded to United's decertification motion, the parties worked with Mr. Peterson a fourth time and negotiated the proposed settlement.

15. Terrell Marshall took the lead on implementation of the settlement, including working with the Settlement Administrator and defense counsel on the notice and claims process and responding to class member inquiries about the case and settlement. If the Court grants final approval of the settlement, we will continue this work until the settlement has been fully implemented, including reporting to the Court.

B. Terrell Marshall's Experience.

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

17. I am a founding member of Terrell Marshall who practices complex litigation, including the prosecution of consumer and wage and hour class actions. In 2005, I received my

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J.D. from the University of Washington School of Law where I was a member of the Washington Law Review. My law review article entitled “Proving Cause in Fact under Washington’s Consumer Protection Act: The Case for a Rebuttable Presumption of Reliance” won the Carkeek prize for best submission by a student author. Before law school, I earned a Ph.D. in Philosophy from Emory University. I have been an active member of the Washington State Bar Association since my admission to the bar in 2005. I was admitted to the Oregon State Bar in 2010. I am currently is vice-president of the board of Washington’s Unemployment Law Project and a Washington State Association for Justice Eagle member. I regularly present at legal conferences on consumer issues.

C. Qualifications of other Terrell Marshall attorneys and senior paralegals.

18. **Beth E. Terrell** is a founding member of Terrell Marshall. With almost thirty years of experience, Ms. Terrell concentrates her practice in complex litigation, including the prosecution of multi-plaintiff, collective, mass and class litigation and arbitration on behalf of consumers and workers. Ms. Terrell has served as co-lead counsel on multi-state and nationwide class actions, resulting in hundreds of millions of dollars in settlements for consumers and workers. Ms. Terrell also represents individual employees with discrimination, sexual harassment, trade secret and restrictive covenant claims. Ms. Terrell co-chairs PLI’s Consumer Financial Services Institute, is a past President of the Public Justice Foundation Board of Directors, serves as Chair of both the Northwest Consumer Law Center and the Washington Employment Lawyers Association, and is a fellow of the American College of Consumer Financial Services Lawyers. In 2023, Ms. Terrell was awarded the National Consumer Law Center’s Vern Countryman Award, recognizing special contributions to consumer law. A member of the State Bar of California and the Washington State Bar Association, Ms. Terrell frequently presents on a wide variety of topics, including class actions, consumer protection, legal ethics, gender equity, and electronic discovery.

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1 19. **Amanda M. Steiner** became a member of Terrell Marshall in 2015. She practices
 2 complex litigation, including the prosecution of consumer, defective product, wage and hour, and
 3 civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in
 4 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that
 5 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex
 6 securities, antitrust, consumer and civil rights class action in federal and state courts throughout
 7 the United States. Ms. Steiner was selected for inclusion in the annual Northern California
 8 “Super Lawyers” list and was named to the Top 50 Women Lawyers of Northern California. She
 9 is a Fellow of the American Bar Foundation.

10 20. **Blythe H. Chandler** joined Terrell Marshall in 2014 and became a member in
 11 2018. Ms. Chandler practices complex litigation with a focus on prosecution of consumer class
 12 actions. She has been appointed class counsel in cases challenging a wide range of unfair or
 13 deceptive practices, including debt collection practices. In 2010, she received her J.D. from the
 14 University of Washington School of Law with high honors, Order of the Coif. Ms. Chandler
 15 served as Chief Articles Editor for the Washington Law Review. Before joining Terrell Marshall,
 16 Ms. Chandler served as a law clerk to the Honorable Betty B. Fletcher, Senior United States
 17 Circuit Judge for the Ninth Circuit Court of Appeals, and to the Honorable John C. Coughenour,
 18 Senior United States District Judge for the Western District of Washington. Ms. Chandler also
 19 served as a judicial extern to the Honorable Robert S. Lasnik, United States District Judge for the
 20 Western District of Washington. Ms. Chandler co-authored chapters of the Consumer Protection
 21 Deskbook published by the Washington State Association for Justice (WSAJ) and has spoken on
 22 topics including use of experts and personal jurisdiction in class actions. Ms. Chandler is a
 23 member of the Public Justice Foundation Board of Directors, is a Co-Coordinator of the
 24 Washington Employment Lawyers Association (WELA) Amicus Committee and currently co-
 25 chairs WSJ’s Consumer Protection Section. She was named to the 2020 Rising Star List by
 26 Washington Super Lawyers.

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21. **Elizabeth A. Adams** joined Terrell Marshall in 2015 and became a member of Terrell Marshall in 2022. Ms. Adams concentrates her practice in complex litigation, including the prosecution of consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams received her J.D. from the UCLA School of Law, where she received the Order of the Coif and served as a Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms. Adams served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu, and the Honorable John A. Kronstadt, all of the United States District Court for the Central District of California. Ms. Adams is a member of the Washington Employment Lawyers Association (WELA), Washington State Association for Justice (WSAJ) Eagle member, Public Justice Student Civil Rights Committee, and a member of the Eastern District of Washington Local Civil Rules Committee for 2024.

22. **Ben Drachler** is a senior associate who joined Terrell Marshall in 2017. Mr. Drachler concentrates his practice on complex civil litigation, including the prosecution of consumer, defective product, and wage and hour class actions. Mr. Drachler also litigates complex disputes involving vulnerable adults and trusts and estates. Mr. Drachler received his J.D. from Seattle University, graduating magna cum laude in 2015. Before joining Terrell Marshall, Mr. Drachler served as law clerk to the Honorable Robert H. Whaley in the United States District Court for the Eastern District of Washington, and to the Honorable Thomas S. Zilly in the Western District of Washington.

23. **Eden Nordby** is an associate at Terrell Marshall. Ms. Nordby joined Terrell Marshall as an associate in 2021. Ms. Nordby concentrates her practice on complex civil litigation, including consumer protection and wage and hour class actions. Ms. Nordby also litigates employment discrimination, wrongful termination, and commercial disputes. Ms. Nordby received her J.D. from the University of Washington in 2021. During law school Ms. Nordby served as Executive Managing Editor of the Washington Journal of Environmental Law and Policy. She received the WSBA Labor & Employment Section 2019 Summer Grant for her

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public service work and commitment to labor and employment issues. Ms. Nordby is trained as a mediator and mediated a number of individual civil matters through the UW School of Law Mediation Clinic. Before joining the firm as an attorney, Ms. Nordby was a senior paralegal at Terrell Marshall from the time the firm opened in 2008 until starting law school in 2018.

24. **Jasmin Rezaie** joined Terrell Marshall as an associate in 2022, and concentrates her practice in complex civil litigation. Ms. Rezaie graduated cum laude from Seattle University School of Law in 2022. During law school, she interned with the Washington State Labor Council, Columbia Legal Services, the ACLU of Washington, and Chief Justice González's chambers in the Washington Supreme Court. Before law school, Ms. Rezaie worked as an immigration paralegal.

25. **Jordan Berger** joined Terrell Marshall Law Group as an associate in 2024, and concentrates her practice on complex civil litigation, civil rights, and employment law. Ms. Berger received her J.D. from New York University School of Law in 2020. Before joining Terrell Marshall Law Group, Ms. Berger worked as a Skadden Fellow for the National Center for Law and Economic Justice, and as law clerk to the Honorable Jamal Whitehead in the Western District of Washington. During law school, she interned with the ACLU Disability Rights Program and with the New York State Office of the Attorney General.

26. **Jennifer Boschen** is a senior paralegal at Terrell Marshall with more than 24 years of experience in the legal field.

27. **Jodi Nuss** is a senior paralegal at Terrell Marshall with more than 15 years of experience in the legal field.

28. **Heather Brown** is a paralegal at Terrell Marshall with more than 20 years of experience in the legal field.

D. Other cases litigated by Terrell Marshall.

29. Examples of Telephone Consumer Protection Act class actions that Terrell Marshall is litigating or has litigated to successful completion include:

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- a. *Williams v. PillPack LLC*—Filed in 2019 on behalf of consumers who received calls selling pharmacy services on their cell phones and residential telephones without their prior express consent. The Western District of Washington has denied a defense motion for summary judgment and certified a class for litigation.
- b. *Hoffman v. Hearing Help Express, Inc. et al.*—Filed in 2019 on behalf of consumers who received calls placed using an automatic telephone dialing system without their consent and when their phones were on the National Do-Not-Call Registry. This Court granted final approval of the \$1.3 million settlement on October 7, 2021.
- c. *Abante Rooter & Plumbing, Inc., et al. v. Alarm.com Inc., et al.*—Filed in 2015 on behalf of consumers who received solicitation calls on their cellular and residential telephones without their prior express consent. The Northern District of California granted final approval of the \$28 million settlement on August 15, 2019.
- d. *Borecki v. Raymours Furniture Co., Inc.*—Filed in 2017 on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent. The Southern District of New York granted final approval of the \$4.25 million settlement on September 10, 2019.
- e. *Snyder v. Ocwen Loan Servicing, LLC*—Filed in 2014 on behalf of consumers who received automated collection calls on their cellular telephones without their prior express consent. The Northern District of Illinois granted final approval of the \$21.5 million settlement on May 14, 2019.
- f. *Melito, et al. v. American Eagle Outfitters, Inc., et al.*—Filed in 2014 on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent. The Southern District of New York granted final approval to the \$14.5 million settlement on September 11, 2017, which the Second Circuit affirmed on April 30, 2019.
- g. *In re Capital One Telephone Consumer Protection Act Litigation*—Filed in 2012 on behalf of consumers who received automated, prerecorded collection calls on their cellular telephones without their prior express consent. Terrell Marshall served as co-lead counsel in the multidistrict litigation. The

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Northern District of Illinois granted final approval of the \$75 million settlement on February 23, 2015.

- h. *In re Monitronics International, Inc. Telephone Consumer Protection Act Litigation*—Filed in 2011 on behalf consumers who received automated, prerecorded solicitation calls on their residential and telephones without their prior express consent. Terrell Marshall served as co-lead counsel in the multidistrict litigation. The Northern District of West Virginia granted final approval of the \$28 million settlement on June 12, 2018.
- i. *Abante Rooter & Plumbing, Inc. v. Pivotal Payments Inc.*—Filed in 2016 on behalf of consumers that received automated solicitation telephone calls to their cell phones without their prior express consent. The Northern District of California granted final approval of the \$9 million settlement on October 15, 2018.
- j. *Wilkins, et al. v. HSBC Bank Nevada, N.A., et al.*—Filed in 2014 on behalf of individuals who received prerecorded calls using an automatic dialing system without their prior consent. The Northern District of Illinois granted final approval of the \$39.9 million settlement on March 17, 2015.
- k. *Booth v. Appstack, Inc.*—Filed in 2013 on behalf of small businesses that received prerecorded calls using an automatic dialing system on cellular telephone lines without their prior consent. The court certified the class, denied a motion to decertify, denied the defendants’ motion for summary judgment and granted partial summary judgment for the class. The case settled on the eve of trial and the court granted final approval of the \$975,000 settlement in 2017.

30. Additional information about class actions litigated by Terrell Marshall is available on our website www.terrellmarshall.com.

E. Terrell Marshall’s Attorneys’ Fees and Costs.

31. Since the beginning of this case, Terrell Marshall has worked with no guarantee of being compensated for its time and efforts. Payment of Terrell Marshall’s fees has always been contingent on successfully obtaining relief for the plaintiff and class members. As a result, there was a substantial risk of non-payment, particularly in light of the challenges inherent in this

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1 type of case. Work on this case has necessarily been to the exclusion of work on other matters
 2 that likely would have generated fees. Terrell Marshall has also been denied use of the fees it
 3 earned over the course of this case.

4 **F. Terrell Marshall's lodestar.**

5 32. I reviewed the firm's contemporaneous billing records and reduced and
 6 eliminated time where appropriate. I eliminated time that was administrative in nature, or that
 7 appeared to be redundant or inefficient. I also removed time billed by attorneys and staff
 8 members who devoted fewer than five hours to the case. Terrell Marshall handled much of the
 9 administrative work in this case, including service and filing, calendaring, coordinating
 10 schedules, and administrative work related to trial preparation, and we removed a significant
 11 amount of time spent on those tasks. In total, I removed 25.5 hours and over \$13,500 in lodestar
 12 from Terrell Marshall's time. The remaining time was reasonably necessary to litigate this case
 13 and secure a settlement on behalf of Plaintiff and the Classes. A spreadsheet that compiles the
 14 contemporaneously maintained billing records of Terrell Marshall attorneys and staff is attached
 15 as **Exhibit 1**.

16 33. The work performed by our experienced paralegals and legal assistants was work
 17 that I or an attorney would have had to perform absent their assistance. Their work required an
 18 understanding of the case and was important to developing the facts and claims at issue in the
 19 case. These paralegals are qualified to perform substantive work based on their training and past
 20 experience working for attorneys. Additionally, Jodi Nuss and Jennifer Boschen's work included
 21 extensive data analysis that was instrumental to prosecuting the case.

22 34. The following table identifies the attorneys and staff members from Terrell
 23 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the
 24 timekeepers below I have stated the current hourly rate, the number of hours worked through
 25 March 3, 2025, and the total amount of fees. These time summaries are taken from
 26

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contemporaneous, daily reports prepared and maintained by Terrell Marshall in the regular course of business.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Beth E. Terrell Founding Member J.D. from Univ. of California, Davis School of Law, 1995	Strategized about overall case management; reviewed and commented on draft pleadings and motions; assisted with depositions and day-to-day discovery; assisted with settlement strategy and attended mediations.	\$840.00	29.5	\$24,780
Jennifer Rust Murray Founding Member J.D. from Univ. of Washington School of Law, 2005	Responsible for case management and overall case strategy, worked on investigation and complaint, managed discovery and experts, participated in depositions of United representatives, worked on class certification and notice strategy and motions, drafted responses to summary judgment motions, managed subpoenas to wireless carriers, related motions to enforce, and worked on settlement strategy and documentation.	\$725.00	1468.6	\$1,064,735.00
Amanda Steiner Member J.D. from UC Berkeley School of Law, 1997	Assisted with case strategy and case management; drafted class certification motions and supporting documents; drafted answer to decertification motion; helped work	\$750.00	552.6	\$414,450.00

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Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.319.5450
www.terrellmarshall.com

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
	with experts; assisted with pre-trial discovery strategy; drafted preliminary approval motion.			
Blythe D. Chandler Member J.D. from Univ. of Washington School of Law, 2010	Assisted with strategy and case management; assisted with class certification hearing preparation; drafted opposition to motion to dismiss absent class members and argued motion; managed subpoenas to wireless carriers, including follow up meet and confers with carriers' counsel; reviewed audio file recordings and transcripts; assisted with pre-trial discovery strategy and efforts, including fact and expert discovery; assisted with response to decertification and Daubert motions; assisted drafting settlement agreement and preliminary approval motion.	\$600.00	229.3	\$137,580.00
Elizabeth A. Adams Member J.D. from UCLA School of Law, 2012	Reviewed audio files and call transcripts.	\$500	49.8	\$24,900.00

DECLARATION OF JENNIFER RUST MURRAY
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE
AWARD - 12

Case No. 2:19-cv-00175-MJP

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NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Ben Drachler Associate J.D. from Seattle Univ. School of Law, 2015	Assisted with decertification response and supporting documents.	\$400	24.2	\$9,680.00
Eden Nordby Associate J.D. from Univ. of Washington School of Law, 2021	Assisted with legal research.	\$250	24	\$6,000.00
Jasmine Rezaie Associate J.D. from Seattle Univ. School of Law, 2022	Evaluated documents labeled confidential to determine whether to challenge designation; drafted briefs relating to sealing issue.	\$325	119.8	\$38,935.00
Jordan Berger Associate J.D. from New York University School of Law, 2020	Drafted discovery responses.	\$325	23.6	\$7,670.00
Jennifer Boschen Senior Paralegal 24 years legal experience	Reviewed and coded audio files and transcriptions.	\$295	128.1	\$37,789.50
Jodi Nuss Senior Paralegal 14 years legal experience	Managed, processed, and analyzed data productions, documents, and recordings produced by United and third parties, worked on subpoenas to wireless carriers, worked with experts, assisted with discovery, motions, and deposition and trial preparation.	\$295	890.8	\$262,786.00
Heather Brown Senior Paralegal 22 years legal experience	Processed document productions and reviewed and analyzed call recordings.	\$225	38.2	\$8,595.00

DECLARATION OF JENNIFER RUST MURRAY
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE
AWARD - 13

Case No. 2:19-cv-00175-MJP

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NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Jessica Langsted Paralegal (former) 7 years legal experience	Processed document productions and reviewed and coded audio recordings and transcriptions.	\$225	79.2	\$17,820.00
Holly Rota Legal Assistant 20 years legal experience	Prepared pleadings, subpoenas, discovery requests and responses, and motions and reviewed and coded audio recordings and transcriptions.	\$225	27.3	\$6,142.50
Krystal Brown Legal Assistant 14 years legal experience	Prepared pleadings, subpoenas, discovery requests and responses, and motions.	\$225	45	\$10,125.00
Chantal Montanez Legal Assistant 4 years legal experience	Reviewed and coded audio recordings and transcriptions.	\$125	78.8	\$9,850.00
Michelle Terrell Marketing Manager and Intake Coordinator 4 years legal experience	Reviewed and coded audio recordings and transcriptions.	\$125	32.2	\$4,025.00
Adela Machackova Legal Assistant 2 years legal experience	Reviewed and coded audio recordings and transcriptions.	\$125	42.7	\$5,337.50
Bradford Kinsey Legal Assistant (retired) 28 years legal experience	Prepared pleadings, subpoenas, discovery requests and responses, and motions.	\$225	56.6	\$12,735.00
Grand Total:			3,940.3	\$2,103,935.50

35. Terrell Marshall will incur additional fees in relation to the approval and settlement administration process, including for time spent briefing the final approval motion,

DECLARATION OF JENNIFER RUST MURRAY
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AWARD - 14

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responding to class member inquiries and any objections, attending the final approval hearing, and supervising the claims process and distribution of the Settlement Fund.

36. Terrell Marshall sets rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets where legal services are typically performed; and the experience, reputation and ability of the attorneys and staff members. Washington state and federal courts have approved fee requests based on Terrell Marshall's standard rates at the time of the application in many cases over the years.

G. Terrell Marshall's litigation costs.

37. Terrell Marshall has incurred out-of-pocket litigation expenses totaling \$185,638.89, primarily to cover expenses related to notice to class members, expert witnesses, court reporters and transcripts, data hosting, filing fees, and administrative costs such as mailing and process server expenses. The following chart summarizes Terrell Marshall's litigation costs:

Category of Expense	Total
Couriers/Process Servers	\$715.00
PACER	\$30.00
Filing Fees	\$1,404.49
Electronic Production/Data Hosting	\$17,640.26
Postage	\$1.00
Mediation Fees	\$13,379.17
Court Reporter/Transcription Fees	\$12,044.80
Translation Fees	\$355.00
Expert Fees	\$108,433.55
Professional Fees	\$198.15

DECLARATION OF JENNIFER RUST MURRAY
IN SUPPORT OF PLAINTIFF'S MOTION FOR
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AWARD - 15

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Category of Expense	Total
Class Notice Administrator Fees	\$16,884.09
Cell Phone Carrier Records	\$13,825.00
West Law Charges	\$728.38
TOTAL	\$185,638.89

H. Class Counsel's lodestar.

38. Collectively, Class Counsel billed over 6,140.2 hours for a total lodestar of \$3,533,234.50. Class Counsel worked collaboratively, but also took care to avoid duplication of effort by dividing tasks according to each professional's skill, experience, and availability, both within and amongst the firms. Class Counsel kept contemporaneous, detailed time records in chronological order by timekeeper in the regular course of business. The resulting hours are those that would be billed to a fee-paying client in a non-contingent case.

39. The Declaration James A. Francis of Francis Mailman Soumilas is attached as **Exhibit 2**. Mr. Francis's declaration includes as an exhibit the contemporaneously maintained billing records of his firm's attorneys and staff.

40. The Declaration of Jonathan Shub is attached as **Exhibit 3**. Mr. Shub's declaration includes as an exhibit the contemporaneously maintained billing records of his firm's attorneys and staff.

41. Class Counsel's current hours, by firm, are summarized in this chart.

Firm	Hours	Lodestar
Terrell Marshall Law Group, PLLC	3,940.3	\$2,103,935.50
Francis Mailman Soumilas, P.C.	1,476.6	\$1,052,716.00
Shub Johns & Holbrook, LLP	723.3	\$376,583.00
TOTAL	6,140.2	\$3,533,234.50

DECLARATION OF JENNIFER RUST MURRAY
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE
AWARD - 16

Case No. 2:19-cv-00175-MJP

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1 **I. Service Award.**

2 42. We are requesting a service award of \$20,000 for Plaintiff Frantz Samson, who
3 agreed to step forward and represent the class in this case involving privacy issues. He assisted
4 Class Counsel with developing the facts related to his claims, responded to discovery, and was
5 deposed. Mr. Samson also took a half-day off work to attend mediation in person. I believe a
6 \$20,000 service award for his efforts is reasonable and appropriate.

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

9 EXECUTED at Seattle, Washington and DATED this 14th day of March, 2025.

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11 By: /s/ Jennifer Rust Murray
12 Jennifer Rust Murray, WSBA #36983
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27 DECLARATION OF JENNIFER RUST MURRAY
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE
AWARD - 17

Case No. 2:19-cv-00175-MJP

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Exhibit 2

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FRANTZ SAMSON, a Washington resident,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**DECLARATION OF
JAMES A. FRANCIS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES
AND COSTS**

I, James A. Francis, declare as follows:

1. I am a founding member, shareholder, and attorney at Francis Mailman Soumilas, P.C. ("FMS"), co-counsel of record for Plaintiff in this matter. I am admitted to practice *pro hac vice* before this Court and am a member in good standing of the Bar of the Commonwealth of Pennsylvania. I respectfully submit this declaration in support of Plaintiff's Motion for Attorneys' Fees and Costs. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

A. FMS's Work on this Case.

2. FMS originated this case and was involved in every aspect thereof. Its work on this case is summarized below:

a. Pre-suit investigation of the claims and defenses in this matter and venue considerations;

b. Drafting the Class Action Complaint;

1 c. Engaging in substantial written discovery and extensive follow-up meet and
2 confer efforts throughout the entirety of this litigation;

3 d. Taking the depositions of nearly all Defendant's fact and expert witnesses
4 in this matter, including:

5 i. Adam Fraizer, fact witness, on September 6, 2019;

6 ii. Jennie Jeanette, fact witness, on October 25, 2019;

7 iii. Sarah Paluczek, fact witness, on November 7, 2019;

8 iv. Kevin McGavick, fact witness, on November 8, 2019;

9 v. Sonya Kwon, expert witness, on April 23, 2020;

10 vi. Michelle Klatt, fact witness, on February 28, 2024;

11 vii. Dawn Janzig, fact witness, on August 29, 2024;

12 viii. Stacy Bowdish, fact witness, on August 30, 2024;

13 ix. Esmeralda Puchi, fact witness, on September 4, 2024; and

14 x. Gregory Russo, expert witness, on October 17, 2024.

15 e. Defending the deposition of Plaintiff's expert witness Randall Snyder on
16 May 13, 2020;

17 f. Contributing to the briefing of Plaintiff's Motion for Class Certification;

18 g. Contributing to the briefing of Plaintiff's Opposition to Defendant's Motion
19 for Summary Judgment;

20 h. Contributing to the briefing Plaintiff's Opposition to Defendant's Motion to
21 Decertify the Class;

22 i. Contributing to briefing Plaintiff's Motion for Preliminary Approval;

23 j. Briefing Motion for Preliminary Approval;

24 k. Reviewing voluminous document productions including call recordings and
25 calling records;

26 l. Participating in settlement discussions, editing and revising the settlement
27 agreement and several short form and long form class notices; conferring with counsel for

Defendant regarding same; conferring with notice and settlement administrator regarding class notice and settlement website;

m. Attending all hearings and mediations.

B. FMS's Background and Experience

3. FMS was founded in 1998 as Francis & Mailman, P.C. and has concentrated its practice in consumer protection litigation ever since. A significant portion of that practice area includes consumer class actions.

4. FMS has been repeatedly recognized by numerous federal courts for its class action experience, the high caliber of its work and its commitment to the classes it represents. *See Der Hacopian v. SentryLink*, C.A. 18-3001 (D. Md. Nov. 23, 2020) (firm “many, many times in the past has been found to be not just qualified or competent, but extremely well-qualified and competent to represent consumer classes in many, many other jurisdictions, not only this particular jurisdiction”); *Flores v. Express Services, Inc.*, C.A. No. 14-3298, 2017 WL 1177098, at *3 (E.D. Pa. Mar. 30, 2017) (firm “has extensive experience in consumer class action litigation”); *McIntyre v. RealPage, Inc.*, 2023 WL 2643201, at *3 n.5 (E.D. Pa. Mar. 23, 2023) (referencing “counsel’s overwhelming experience in consumer litigation and class actions”); *Ramirez v. Trans Union, LLC*, 2022 WL 17722395 (N.D. Cal. Dec. 15, 2022) (“Courts have consistently recognized Francis Mailman Soumilas for... the high caliber of its work for the classes it represents.”); *Martinez v. Avantus, LLC*, 343 F.R.D. 254, 266 (D. Conn. 2023) (firm “has substantial experience in class action litigation... [and] demonstrated proficiency at all stages of suit”); *Brooks v. Trans Union, LLC*, ___ F. Supp. 3d ___, 2024 WL 3625142, at *14 (E.D. Pa. Aug. 1, 2024)(finding FMS attorneys “highly qualified, experienced and capable.”); *Patel v. Trans Union, LLC*, 308 F.R.D. 292, 307 (N.D. Cal. 2015) (noting counsel have represented consumer classes in many cases in many districts ... [and] have shown their proficiency in this case[.]”); *Barel v. Bank of America*, 255 F.R.D. 393, 398-99 (E.D. Pa. 2009) (finding firm “competent, experienced and well-qualified to prosecute class actions” and noting that class counsel “have done an excellent job in representing the class in the instant litigation.”); *Kelly v. Business Information Group*, C.A. 15-6668, 2019 WL

1 414915 (E.D. Pa. 2019) (firm “qualified and experienced attorneys” ... Francis & Mailman, P.C.,
 2 of Philadelphia...who have substantial experience in class action... who are qualified to conduct
 3 the litigation.”).

4 5. A biography of FMS is attached hereto as Exhibit A.

5 **C. Qualifications of FMS’s Attorneys and Senior Paralegals**

6 6. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania,
 7 and am admitted to practice in the following additional jurisdictions: New Jersey state court;
 8 United States Courts of Appeal for the First, Second, Third, Fourth, Sixth, Seventh, Ninth and
 9 Eleventh Circuits; United States District Courts for the Eastern District of Pennsylvania, Middle
 10 District of Pennsylvania, District of New Jersey, Eastern District of Michigan, Northern District
 11 of Oklahoma, Central District of Illinois; and the United States Supreme Court.

12 7. I have been practicing consumer litigation for the past 25 years. I have been
 13 recognized by my peers for my advocacy and work throughout my career, including being ranked
 14 as a Top 100 Superlawyer for Pennsylvania and Philadelphia on many occasions over the last 20
 15 years, including just recently in 2024. Beyond my peers, I have been awarded numerous
 16 professional distinctions, including being profiled in Law360’s *Titans of the Plaintiff’s Bar* in
 17 2014, being awarded the Equal Justice Award by Community Legal Services of Philadelphia in
 18 2014 and being inducted into the American College of Consumer Financial Services Lawyers in
 19 2023.

20 8. **John Soumilas** is a partner in FMS. A seasoned litigator, John has represented
 21 thousands of consumers in individual cases and class actions, with career settlements and verdicts
 22 valued at more than \$180M. He currently represents persons defamed and otherwise harmed by
 23 credit reporting, employment background and tenant screening errors, victims of identity theft,
 24 students and student loan borrowers, individuals harassed and deceived by collectors and other
 25 businesses, as well as consumers who are subjected to unwelcome invasions of their privacy,
 26 overcharging, and other deceptive trade practices. John has been repeatedly recognized by
 27 Philadelphia Magazine as a “SuperLawyer,” a recognition received by only 5% of attorneys in

1 Pennsylvania. He has been nationally recognized for his work in protecting consumer rights under
2 the federal Fair Credit Reporting Act (FCRA). Throughout his career, John has obtained some of
3 the highest consumer jury verdicts, including the highest known FCRA verdicts in Pennsylvania,
4 California, and Michigan, and had been appointed by federal judges as class counsel in some of
5 the largest FCRA class cases and settlements. John is a 1994 cum laude graduate of Rutgers
6 University, where he was inducted into Phi Beta Kappa. He also holds a master's degree in
7 American history from Stony Brook University, obtained in 1996. John received his law degree
8 cum laude from the Temple University Beasley School of Law in 1999, where he was a member
9 of the Temple Law Review. He began his legal career by clerking for Justice Russell M. Nigro of
10 the Supreme Court of Pennsylvania.

11 9. **David A. Searles**, of counsel to the firm, is admitted to practice before the Supreme
12 Court of the United States, the United States Courts of Appeals for the Third, Fourth and Sixth
13 Circuits, and the United States District Courts for the District of Maryland, the District of
14 Colorado, the Northern District of Oklahoma, and Eastern and Middle Districts of Pennsylvania,
15 as well as the state courts of Pennsylvania. He is a graduate of the American University School of
16 Law, Washington, D.C., where he served on law review. Following graduation from law school,
17 Mr. Searles was an attorney for Community Legal Services of Philadelphia, where he specialized
18 in consumer and bankruptcy law. In 1990, he successfully argued the first consumer reorganization
19 bankruptcy case considered by the U.S. Supreme Court, *Pennsylvania v. Davenport*, 495 U.S. 552
20 (1990), and has served as lead counsel and presented arguments in numerous consumer law cases
21 before the United States Court of Appeals for the Third Circuit. From 1992 through 1997, Mr.
22 Searles was associated with the Philadelphia law firm of Drinker Biddle & Reath LLP, where his
23 practice focused on Chapter 11 bankruptcy and creditors' rights. Thereafter, he was a member of
24 Donovan Searles, LLC until 2011, specializing in consumer class action litigation. In 2005, Mr.
25 Searles was awarded the Equal Justice Award at the Community Legal Services Breakfast of
26 Champions for his role in directing funding for legal assistance for low-income residents of
27 Philadelphia. Mr. Searles has served as the Pennsylvania contributor to SURVEY OF STATE

1 CLASS ACTION LAW (ABA Section of Litigation – 2010), and as a contributing author of
2 PENNSYLVANIA CONSUMER LAW (2010). He has taught advanced bankruptcy law at the
3 Rutgers University School of Law – Camden, business law at Widener University and bankruptcy
4 law at Pierce Junior College, Philadelphia. He is a past co-chairperson of the Education Committee
5 of the Eastern District of Pennsylvania Bankruptcy Conference. Mr. Searles has been named a
6 Pennsylvania Super Lawyer for many years.

7 10. **Lauren KW Brennan** joined FMS in 2013 and became a partner of the firm in
8 2024. Lauren is a zealous consumer advocate and skilled litigator who has spent her entire career
9 seeking to vindicate the rights of consumers. She concentrates her practice on class action litigation
10 on behalf of consumers harmed by credit reporting errors, inaccurate employment background
11 screening, abusive debt collection practices, and other unfair and fraudulent trade practices.

12 11. **Geoffrey H. Baskerville** is a 1982 graduate of Gettysburg College and a 1992
13 graduate of the Dickinson School of Law. During law school, Geoffrey published an article entitled
14 Human Gene Therapy: Application, Ethics and Regulation in the Dickinson Law Review, Vol. 96,
15 No. 4. Since graduating from law school, Geoffrey has worked for both plaintiff and defense
16 litigation firms practicing in the areas of medical malpractice, architect's and engineer's
17 malpractice, the Federal Employer's Liability Act, and trucking litigation. In 2007, Geoffrey
18 joined Francis Mailman Soumilas P.C. and began to practice in the area of consumer protection
19 litigation, including fair credit reporting and fair debt collection. Since that time, Geoffrey has
20 concentrated his practice on representing consumers in cases under the Fair Credit Reporting Act,
21 the Fair Debt Collection Practices Act, the Telephone Consumer Protection Act and other
22 consumer statutes. He has represented clients in cases against background screening companies,
23 credit reporting agencies, banks, credit card companies and other financial institutions. Geoffrey
24 is admitted to practice before the United States Court of Appeals for the Ninth Circuit, the United
25 States District Courts for the Eastern and Middle Districts of Pennsylvania, the District of New
26 Jersey, the Eastern District of Michigan, the District of Colorado, the Western District of Texas,

the Central District of Illinois, and the District of New Mexico, as well as the state courts of Pennsylvania and New Jersey.

12. **Jordan M. Sartell** joined the class action practice of FMS in 2017 and litigates on behalf of consumers harmed by unlawful credit reporting, tenant screening, background checks, debt collection, and other deceptive and unfair business practices. Jordan received his law degree *summa cum laude* from the DePaul University College of Law in 2012, where he was a member of the DePaul Law Review. Jordan began his legal career protecting vulnerable senior citizens from financial exploitation with Prairie State Legal Services. Jordan is admitted in Illinois and practices in federal district and appellate courts throughout the United States. Jordan lives in suburban Chicagoland with his wife and two. Jordan served on the Editorial Board of the DuPage County Bar Association's legal journal, *The Brief*, from 2014 to 2023, including as its Editor in Chief from 2021 to 2022 and Associate Editor from 2020 to 2021. Jordan is also a member of the National Association of Consumer Advocates and regularly provides pro bono advice and counsel on a variety of consumer issues.

D. Other Cases Litigated by FMS

13. FMS has been certified to serve as class counsel by federal courts in over 80 cases. *See* Exhibit A.

14. Notable Cases Litigated by FMS include:

- *Teran v. Navient Solutions, LLC et al.*, __ B.R. __, 2023 WL 2721904 (Bankr. N.D. Cal. Mar. 30, 2023)/*Woodard v. Navient Solutions, LLC et al.*, 8:23-cv-301 (D. Neb., Jan. 9, 2024, DOC. 38). Appointed Class Counsel to represent national injunctive relief class for student loan bankruptcy violations; later settled for \$82 million in class-wide relief.
- *Ramirez v. Trans Union, LLC*, 951 F.3d 1008 (9th Cir. 2020), 141 S.Ct. 2190 (2021); 2022 WL 17740302 (N.D. Cal. Dec. 22, 2022); . Served as trial and appellate counsel in record \$60 million jury verdict for a case brought under the Fair Credit Reporting Act; argued appeal against former Solicitor General of the United States affirming verdict (with remittitur); upon certiorari, remanded by US Supreme; later settled for \$9 million.
- *In re TransUnion Rental Screening Sols., Inc., Fair Credit Reporting Act Litig.*, 437 F. Supp. 3d 1377, 1378 (U.S. Jud. Pan. Mult. Lit. 2020). Served as Co-Lead counsel in

national consumer class action settlement in excess of \$11M to compensate victims of inaccurate data on tenant screening reports.

- *Robinson v. National Student Clearinghouse*, No. 1-19-cv-10749, 2020 WL 4873728 (D. Mass. July 8, 2020) *aff'd* 14 F.4th 56 (1st Cir. 2021). In first case challenging the defendant as a consumer reporting agency, obtained \$2 million dollar settlement for consumers who were overcharged for college verifications and brought company into FCRA compliance.
- *Patel v. Trans Union, LLC*, 2018 WL 1258194 (N.D. Cal. March 11, 2018). Served as lead Class Counsel in case which obtained an \$8 million dollar settlement for class of consumers who were falsely being reported as terrorists.
- *Freckleton v. Target Corporation*, C.A. No. 14—CV-00807 (D. Md. Dec. 12, 2017). Served as Co-Lead Class Counsel in securing \$8.3 million dollar class action settlement on behalf of nationwide class of Target job applicants.
- *Thomas v. Equifax Info. Services, LLC*, No. 18-cv-684 (E.D. Va.). National Class Counsel in FCRA class action, alleging violations by credit bureau for misreporting public records, providing nationwide resolution of class action claims asserted across multiple jurisdictions, including injunctive relief, and an uncapped mediation program for millions of consumers.
- *In Re: TRS Recovery Services, Inc. and Telecheck Services, Inc.*, Fair Debt Collection Practices Act (FDCPA Litigation)- Served as Class Counsel in a national FDCPA class action and obtained a 3.4-million-dollar settlement against one of the nation's largest check history consumer reporting agencies.
- *Berry v. LexisNexis Risk & Info. Analytics Group, Inc.*, No. 3:11-cv-754, 2014 WL 4403524, at *11 (E.D. Va. Sept. 5, 2014) -- Appointed class counsel in national FCRA class action that obtained a \$13.5-million-dollar settlement against Lexis/Nexis, one of the largest information providers in the world, along with a groundbreaking injunctive relief settlement on behalf of 200 million Americans in which LexisNexis agreed to bring its Accurint product into FCRA compliance.
- *Thomas v. BackgroundChecks.com*, C.A. No. 13-029 (E.D. Va. Aug. 11, 2015) – Appointed class counsel in an FCRA national class action which obtained \$18 million against another of the largest background screening companies in the world, and also obtained significant injunctive and remedial relief.
- *Henderson v. Acxiom Risk Mitigation, Inc.*, C.A. No. 12-589 (E.D. Va., Aug. 7, 2015)- Appointed class counsel in a national FCRA class action which obtained a \$20.8 million settlement against one of the largest data sellers and background screening companies in the world.
- *Ryals et al. v. Hireright Solutions, Inc.*, C.A. No. 3:09cv625 (E.D. Va. Dec. 22, 2011) – \$28.3 million national settlement achieved for class of consumers subjected to employment background checks in case brought under Fair Credit Reporting Act (FCRA); believed to be the third largest FCRA settlement in history.

- 1 • *Little v. Kia Motors America, Inc.*, 2003 WL 25568765 (N.J. Super. L. 2003) – \$6 million (approximate) verdict for class of New Jersey car purchasers.
- 2 • *Samuel-Bassett v. Kia Motors America, Inc.*, ___ A.3d ___, 2011 WL 60559098 (Pa. 2011), C.P. Phila. County, January Term, 2001, No. 2199 – \$5.6 million verdict for class of Pennsylvania car purchasers, plus award of attorney’s fees.

4 **E. FMS’s Fees and Costs**

5 15. Since the beginning of this case, FMS has worked with no guarantee of being
6 compensated for its time and efforts. Payment of its fees has always been contingent on
7 successfully obtaining relief for the plaintiff and class members. As a result, there was a substantial
8 risk of non-payment, particularly in light of the challenges inherent in this type of case. Work on
9 this case has necessarily been to the exclusion of work on other matters that likely would have
10 generated fees, and FMS has also been denied use of the fees it earned over the course of this case.

11 **F. FMS’S Lodestar**

12 16. In addition to myself, FMS attorneys John Soumilas, David Searles, Jordan M.
13 Sartell, Lauren KW Brennan, Geoffrey Baskerville, and Mark Mailman have submitted billable
14 hours for the litigation of this case. Additionally, my firm seeks billable time for experienced
15 paralegals who worked on the case. A detailed description of the time expended by my firm in this
16 matter, by timekeeper, is set forth in the attached Exhibit B and summarized in the table below.
17 The time entries upon which the table is based were generated from the time records regularly
18 prepared and maintained by my firm within our firm’s billing software. Estimates have been added
19 for time expected to be spent in the future in connection with the final approval motion and hearing
20 and for ongoing class administration and delivery of funds to class members. Including these
21 estimates, FMS’s time expended in this case is 1,476.6 hours in total. Time expended that has been
22 considered duplicative or redundant has been eliminated from this lodestar. Consistent with our
23 firm’s usual practice, tasks and assignments were apportioned to avoid the expenditure of
24 duplicative time and redundant staffing.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
James A. Francis Founding Member J.D., Temple Univ., Beasley School of Law, 1996	Lead FMS attorney on this case with responsibility for all aspects thereof; primarily responsible for oral discovery, took the depositions of ten defense fact and expert witnesses; worked on discovery, including experts, worked on briefs; worked on class certification strategy; worked on settlement strategy and documentation; attended mediations	\$840	665.0	\$558,600.00
John Soumilas Partner J.D., Temple Univ., Beasley School of Law, 1999	Participated in drafting of the class action complaint; oversaw preparation of early discovery requests; took deposition of defense witness Jeanette; worked on class certification strategy as well as settlement and mediation strategy throughout litigation	\$745	413.5	\$308,057.50
Jordan M. Sartell Associate J.D., DePaul Univ. College of Law, 2012	Drafted class action complaint; worked on fact and expert discovery, including drafting discovery requests and assisting in the preparation of Plaintiff's expert for deposition; worked closely James Francis to preparation for several depositions; contributed to several briefs	\$445	176.9	\$78,720.50
David Searles Of Counsel J.D., American University School of Law, 1975	Worked on fact and expert discovery, including defense of expert's deposition; prepared mediation statement; assisted with mediation and settlement strategy	\$875	51.6	\$45,150.00
Lauren KW Brennan Partner J.D., Temple Univ., Beasley School of Law, 2013	Assisted with written discovery and deposition preparation; assisted with class certification strategy and legal research; assisted with mediation preparations and settlement strategy	\$470	9.6	\$4,512.00

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Geoffrey Baskerville Senior Associate J.D., Dickinson School of Law, 1992	Worked with Plaintiff to analyze potential claims, strategies, venue considerations, class action treatment; assisted with drafting of complaint	\$710	3.8	\$2,698.00
Mark D. Mailman Founding Member J.D. Temple Univ, Beasley School of Law, 1996	Assisted with initial assessment, including strategy and venue considerations	\$840	2.2	\$1,848.00
Experienced Paralegals	Assisted FMS attorneys with pleadings, discovery, depositions, motion practice, and mediation-related tasks throughout the litigation	\$345	154.0	\$53,130.00
TOTAL:			1,476.6	\$1,052,716.00

G. FMS'S Hourly Rates

17. The hourly rates charged by the attorneys and paralegals at my firm are not self-determined but have been independently set for many years based upon the opinions of outside counsel at the law firm of Fox Rothschild, LLP. Our rates are based upon the expert opinion of Abraham C. Reich, which is attached as Exhibit C. The Reich report has also been adapted to various markets where my firm has offices and/or practices along with local counsel or co-counsel, including Seattle.

H. Litigation Expenses Incurred by FMS

18. The lodestar figure above does not include out-of-pocket expenses and the costs of the litigation, which are billed separately.

19. My firm has incurred a total of \$136,693.80 in unreimbursed expenses in connection with the prosecution of this litigation. As detailed in Exhibit D hereto, \$100,187.87 of this amount is FMS's share of expert witness fees in this matter. The remaining portion of FMS's

1 expenses were for deposition costs, outside copying fees, service, legal research, and travel
 2 expenses. Each of the expenses would typically be billed to paying clients and are summarized
 3 below:

4	Category of Expense	Total
5	Deposition / Video	\$26,686.77
6	Expert Witness Fees	\$100,187.87
7	Mediation	\$1,733.33
8	FedEx	\$226.90
9	Outside Copying Fees	\$27.08
10	PACER Fees	\$77.30
11	<i>Pro Hac Vice</i> Fees	\$462.00
12	Travel (including airfare, lodging, car rental, cabs, parking, tolls, etc.)	\$7,292.55
13	TOTAL	\$136,693.80

14 20. The expenses incurred in this action are reflected on the books and records of my
 15 firm. These books and records are prepared from expense vouchers, check records, software, and
 16 other source materials and are an accurate record of the expenses.

17 I declare under the penalty of perjury that the foregoing is true and correct.

18 Executed on March 13, 2025

/s/James A. Francis

James A. Francis, Esq.

Exhibit A



FRANCIS MAILMAN SOUMILAS, P.C.

Barel v. Bank of America

Martinez

v. Avantus, LLC,

Ramirez v. Trans Union, LLC

Der Hacopian v. SentryLink

; Flores v. Express Services, Inc.

White v.

Equifax Info. Solutions
aff'd sub nom. Radcliffe v. Equifax Info. Sol'ns., Inc.

Patel v. Trans Union, LLC

Kelly v. Business Information Group

Larson v. Trans Union, LLC

JAMES A. FRANCIS

Ramirez v. Trans Union, LLC,
v. Trans Union, LLC

Cortez

Philadelphia Magazine *Pennsylvania Super Lawyers*

Titans of the Plaintiff's Bar
Equal Justice Award

Today Show *PBS NewsHour*
The Philadelphia Inquirer

EDUCATION

cum laude

ADMISSIONS

HONORS AWARD DISTINCTIONS

*Titan of the Plaintiff's Bar
Equal Justice Award*

NOTABLE CASES

Teran v. Navient Solutions, LLC et al

Ramirez v. Trans Union, LLC

*Robinson v. National Student Clearinghouse
aff'd*

Patel v. Trans Union, LLC,

Thomas v. Equifax Info. Services, LLC

Clark v. Experian Info. Sols., Inc.

Clark/Anderson v. Trans Union, LLC

In Re: TRS Recovery Services, Inc. and Telecheck Services, Inc.

Berry v. LexisNexis Risk & Info. Analytics Group, Inc.

Thomas v. BackgroundChecks.com

Henderson v. Acxiom Risk Mitigation, Inc

Ryals et al. v. Hireright Solutions, Inc.,

Cortez v. Trans Union, LLC

Little v. Kia Motors America, Inc.,

Samuel-Bassett v. Kia Motors America, Inc., ____

Serrano v. Sterling Testing Systems, Inc. ____

Ziegenfuse v. Apex Asset Management, LLC

Stoner v. CBA Information Services

Richburg v. Palisades Collection, LLC

Perry v. FleetBoston Financial Corp.

Crane v. Trans Union, LLC,

Lawrence v. Trans Union, LLC

Wisneski v. Nationwide Collections, Inc.

Evantash v. G.E. Capital Mortgage Services, Inc.

Sheffer v. Experian Information Solutions, Inc.

Sheffer v. Experian Information Solutions Inc.,

Sullivan v. Equifax, Inc. et al.

Wenrich v. Cole

Jaramillo v. Experian Information Solutions, Inc.

CLASS COUNSEL CERTIFICATIONS

Woodard v. Navient Solutions, LLC et al., No. 8:23-cv-00301-RFR

Botts v. The Johns Hopkins University,

Teran v. Navient Solutions, LLC et al

Martinez v. Avantus, LLC,

Stewart et al v. LexisNexis Risk Data Retrieval Services, LLC et al.,

Healy v. Milliman, Inc.,

Kang v. Credit Bureau Connection, Inc.,

Watson v. Checkr, Inc.,

Deaton v. Trans Union, LLC,

Sanders v. Makespace Labs, Inc

Der-Hacopian v. Darktrace, Inc.,

Der-Hacopian v. Sentrylink, LLC,

McIntyre v. RealPage, Inc.,

Norman v. Trans Union, LLC,

Robinson v. National Student Clearinghouse
aff'd

Leo v. Appfolio, Inc.,

Thomas v. Equifax Info. Services, LLC

Clark v. Experian Info. Sols., Inc.

Clark/Anderson v. Trans Union, LLC

Gibbons v. Weltman, Weinberg & Reis Co., LPA,

Kelly v. Business Information Group

Ridenour v. Multi-Color Corporation,

Flores v. Express Personnel

Larson v. Trans Union, LLC

Miller v. Trans Union, LLC

Henderson v. Trans Union, LLC

Pawlowski v. United Tranzactions, LLC

Rodriguez v. Calvin Klein, Inc.,

Giddiens v. Infinity Staffing,

Giddiens v. First Advantage

Jones v. Halstead Management Corporation,

Berry v. LexisNexis Risk & Info. Analytics Group, Inc

Thomas v. BackgroundChecks.com,

Henderson v. Acxiom Risk Mitigation, Inc.

Magallon v. Robert Half International, Inc.

Carter v. McDonald's Restaurants,

Patel v. Trans Union, LLC,
Goode v. First Advantage LNS Screening Sols., Inc
Blandina v. Midland Funding, LLC,
King v. General Information Services, Inc
Robinson v. General Information Services, Inc
Ramirez v. Trans Union, LLC
White v. Experian Information Solutions,
Sapp v. Experian Information Solutions, Inc.,
LaRocque v. TRS Recovery Services, Inc
Ryals et al. v. Hireright Solutions, Inc.,
Serrano v. Sterling Testing Systems, Inc.,
Summerfield v. Equifax Information Services, LCC
Chakejian v. Equifax Information Services, LLC
Jones v. Midland Funding, LLC,
Barel v. Bank of America,
Mann v. Verizon
Smith v. Grayling Corp.,
Strausser v. ACB Receivables Management, Inc.,
Nienaber v. Citibank (South Dakota), N.A.,
Jordan v. Commonwealth Financial Systems, Inc.
Marino v. UDR
Seawell v. Universal Fidelity Corp,
Perry v. FleetBoston Financial Corp.
Beck v. Maximus, Inc.
Beck v. Maximus
Stoner v. CBA Information Services
Bittner v. Trans Union, LLC,
Wisneski v. Nationwide Collections, Inc.
Petrolito v. Arrow Financial Services, LLC
Orloff v. Syndicated Office Systems, Inc
Bonett v. Education Debt Services, Inc.
Gaumer v. The Bon-Ton Stores
Street v. Portfolio Recovery Associates
Samuel-Bassett v. Kia Motors America, Inc.,
Oslan v. Law Offices of Mitchell N. Kay,
Oslan v. Collection Bureau of Hudson Valley

Saunders v. Berks Credit & Collections
Schilling v. Let's Talk Cellular and Wireless
Fry v. Hayt, Hayt and Landau
Smith v. First Union Mortgage Corporation
Miller v. Inovision

LECTURES PRESENTATIONS BY INVITATION

Rule 23(c)(5) Subclasses: Certification, Due Process, Adequate Representation, and Settlement

Data Protection at the Federal Level

27th Annual Consumer Financial Services Institute, , Debt Collection and Credit Reporting Update,

Tenant Screening Litigation: FCRA and Civil Rights Claims

27th Annual Consumer Financial Services Institute, , Debt Collection and Credit Reporting Update,

Representing the Pro Bono Client: Consumer Law Basics

Perrin Conferences Class Action Litigation Virtual Conference

27th Annual Consumer Financial Services Institute- Debt Collection and Credit Reporting Update

Consumer Finance Class Actions: FDCPA, FCRA & TCPA Webinar

Introduction to the Fair Credit Reporting Act Representing the Pro Bono Client: Consumer Law Basics 2020

Representing the Pro Bono Client: Consumer Law Basics 2019,

Consumer Financial Services & Banking Law Update

Consumer Finance Class Actions

Representing the Pro Bono Client: Consumer Law Basics 2019,

Fair Credit Reporting Act Conference

Fair Credit Reporting Act Conference

Fair Credit Reporting Act Conference

Beyond E-Oscar: Litigating “Non-Credit” FCRA Cases

FDCPA Class Actions: Latest Litigation Developments

*FCRA and FACTA: Leveraging New Developments
in Certification, Damages and Preemption*

FCRA Developments

11th Consumer Class Action Symposium

Tenant, Employment and Chexsystems Reports

Specialty Consumer Reports and the FCRA

*Taking on the Challenges Facing Workers with Criminal Records: Advancing the Legal
and Policy Advocacy Agenda*

Collection Issues Including The TCPA & Hot Topics

ABCs of Fair Credit Reporting Tips on FCRA Depositions Evolution of Credit Reporting Industries

Update *Litigation and Arbitration*

Deposit-Side Litigation Developments & Credit Card Developments

Fair Credit Reporting Act Conference

Fair Credit Reporting Litigation

Litigating Accuracy Issues with Furnishers of Credit Data

Understanding Credit Scoring

Litigating Accuracy Issues With Credit Reporting Agencies

Protecting Privacy, Ensuring Accuracy

Credit Reporting and Debt Collection Litigation

PUBLICATIONS

The FCRA: A Double-Edged Sword for Consumer Data Sellers

Credit Rating Damage: Compensable, Yet Overlooked Damage in Tort Cases

APPOINTMENTS, POSITIONS MEMBERSHIPS

PERSONAL

MARK D. MAILMAN

CLASS COUNSEL CERTIFICATIONS

Martinez v. Avantus, LLC,

Stewart et al v. LexisNexis Risk Data Retrieval Services, LLC et al.,

Healy v. Milliman, Inc.,

Kang v. Credit Bureau Connection, Inc.,

Watson v. Checkr, Inc.,

Deaton v. Trans Union, LLC,

Sanders v. Makespace Labs, Inc

Der-Hacopian v. Darktrace, Inc.,

Der-Hacopian v. Sentrylink, LLC,

McIntyre v. RealPage, Inc.,

Norman v. Trans Union, LLC,

Robinson v. National Student Clearinghouse
aff'd

Leo v. Appfolio, Inc.,

Thomas v. Equifax Info. Services, LLC

Clark v. Experian Info. Sols., Inc.

Clark/Anderson v. Trans Union, LLC

Gibbons v. Weltman, Weinberg & Reis Co., LPA,

Kelly v. Business Information Group

Ridenour v. Multi-Color Corporation,

Flores v. Express Personnel

Larson v. Trans Union, LLC

Miller v. Trans Union, LLC

Henderson v. Trans Union, LLC

Pawlowski v. United Tranzactions, LLC

Rodriguez v. Calvin Klein, Inc.,

Giddiens v. Infinity Staffing,

Giddiens v. First Advantage

Jones v. Halstead Management Corporation,

Berry v. LexisNexis Risk & Info. Analytics Group, Inc

Thomas v. BackgroundChecks.com,

Henderson v. Acxiom Risk Mitigation, Inc.

Magallon v. Robert Half International, Inc.

Carter v. McDonald's Restaurants,

Patel v. Trans Union, LLC,

Goode v. First Advantage LNS Screening Sols., Inc

Blandina v. Midland Funding, LLC,

King v. General Information Services, Inc

Robinson v. General Information Services, Inc

Ramirez v. Trans Union, LLC

White v. Experian Information Solutions,

Sapp v. Experian Information Solutions, Inc.,

LaRocque v. TRS Recovery Services, Inc

Ryals et al. v. Hireright Solutions, Inc.,

Serrano v. Sterling Testing Systems, Inc.

Summerfield v. Equifax Info. Services, LCC

Chakejian v. Equifax Info. Services, LLC

Barel v. Bank of America,

Mann v. Verizon

Smith v. Grayling Corp.

Strausser v. ACB Receivables Management, Inc.

Nienaber v. Citibank (South Dakota), N.A.

Jordan v. Commonwealth Financial Sys., Inc.

Seawell v. Universal Fidelity Corp.

Perry v. FleetBoston Financial Corp.

Beck v. Maximus, Inc

Maximus

vacated on other grounds, Beck v.

Stoner v. CBA Information Services

Bittner v. Trans Union, LLC

Wisneski v. Nationwide Collections, Inc.

Petrolito v. Arrow Financial Services, LLC

Orloff v. Syndicated Office Systems, Inc

Bonett v. Education Debt Services, Inc.

Gaumer v. The Bon-Ton Stores

Street v. Portfolio Recovery Associates

Samuel-Bassett v. Kia Motors America, Inc., vacated on other grounds

Oslan v. Law Offices of Mitchell N. Kay

Oslan v. Collection Bureau of Hudson Valley

Saunders v. Berks Credit & Collections

Schilling v. Let's Talk Cellular and Wireless

Fry v. Hayt, Hayt and Landau

Smith v. First Union Mortgage Corporation

Miller v. Inovision

NOTABLE CASES

Schwartz v. Aracor Search & Abstract, Inc.

Ferguson v. Wells Fargo Bank, NA

King v. General Info. Servs., Inc.

Seamans v. Temple University

Adams v. LexisNexis Risk & Info. Analytics Group, Inc.

Dixon-Rollins v. Trans Union, LLC,

Shames-Yeakel v. Citizens Financial Bank

Cortez v. Trans Union, LLC,

Samuel-Bassett v. Kia Motors America, Inc.,

Little v. Kia Motors America, Inc.,

Serrano v. Sterling Testing Systems, Inc.,

Stoner v. CBA Information Services,

Perry v. FleetBoston Financial Corp.,

Crane v. Trans Union, LLC,

Wisneski v. Nationwide Collections, Inc.,

Evantash v. G.E. Capital Mortgage Services, Inc.,

Sheffer v. Experian Information Solutions, Inc.,

Sheffer v. Experian Information Solutions Inc.,

Sullivan v. Equifax, Inc. et al.,

Wenrich v. Cole,

Jaramillo v. Experian Information Solutions, Inc.,

PRESENTATIONS LECTURES BY INVITATION

Spring Training 2023

Spring Training 2022 (FCRA),

Consumer Rights Litigation Conference

Spring Training 2020 (FCRA)

Fair Credit Reporting Act Conference

Fair Credit Reporting Act Conference

Fair Credit Reporting Act Conference,

Fair Debt Collection Experienced Training Conference,

Fair Debt Collection Experienced Training Conference,

Negotiating 101,

Fair Credit Reporting Act Conference,

Fair Debt Collection Experienced Training Conference,

Litigation Trends: “Getting to Know the Other Team”,

Protecting Vulnerable Consumers and Promoting Marketplace Justice,

FCRA: Playing to Win,

Litigating Accuracy Issues With Furnishers of Credit Data,

Understanding Credit Scoring,

Litigating Accuracy Issues With Credit Reporting Agencies,

FCRA/Building On Our Success,

Protecting Privacy, Ensuring Accuracy,

Credit Reporting and Debt Collection Litigation,

PUBLICATIONS

CFPB Clarifies Employers' Obligations When Using Background Dossiers and Algorithmic Scores in Employment Decisions, The Legal Intelligencer (January, 2025)

Sixth Circuit: Consumer's FCRA Complaint Regarding Inaccurate Spousal Support Obligation Passes Muster, The Legal Intelligencer (October, 2024)

PA High Court Holds Consumers Can Receive Both Punitive and Statutory Treble Damages Under the CPL, The Legal Intelligencer (June, 2024)

CFPB Issues New Guidance Regarding Inaccurate Background Check Reports and Credit File Sharing Practices, The Legal Intelligencer (April, 2024)

CFPB Details Student Loan Servicers' Struggles in Wake of Borrowers Resuming Payments, The Legal Intelligencer, (February, 2024)

Third Circ. Clarifies Furnishers' Duties Under the FCRA to Probe Indirect Disputes, 268 The Legal Intelligencer, 5, 8 (2023)

CFPB Explores AI's Impact on Consumers' Relationships With Financial Institutions, 268 The Legal Intelligencer, 5, 8 (2023)

CFPB Reminds Consumer Reporting Agencies to Toss 'Junk Data' in the Trash,

Your Clients' Consumer Rights Legal Issues May Be Hiding in Plain Sight,

COMMITTEE APPOINTMENTS AND POSITIONS

JOHN SOUMILAS

laude

cum

cum laude

ADMISSIONS

pro hac vice

RECENT WORK

Martinez v. Avantus,

Kang v. Credit

Bureau Connection, Inc.,

Patel v. Trans Union, LLC
Ramirez v. Trans Union, LLC
Union LLC

see also Ramirez v. Trans

Trans Union LLC v. Ramirez

Teran v. Navient Sols. (In re Teran)

Woodard v. Navient Sols

Botts v. Johns Hopkins Univ

Seamans v. Temple University

Norman v. Trans Union, LLC,

Norman v. Trans Union, LLC,

Rivera v. Equifax Info. Servs., LLC

Adams v. LexisNexis Risk & Info. Analytics Group, Inc.

Berry v. LexisNexis Risk & Info. Analytics Group, Inc

Ferguson v. Wells Fargo Bank

In re TransUnion Rental Screening Sols., Inc., Fair Credit Reporting Act Litig.

McIntyre v. RealPage, Inc.,

Kelly v. Business Information Group

Leo v. AppFolio, Inc.

Flores v. Express Personnel

Magallon v. Robert Half International, Inc.

NOTEWORTHY CASES

Teran v. Navient Sols. (In re Teran)

Clark v. Trans Union, LLC

Schwartz v. Aracor Search & Abstract, Inc.

King v. General Info. Servs., Inc.

Howley v. Experian Info. Solutions, Inc

Cortez v. Trans Union

Cortez v. Trans Union, LLC,

Chakejian v. Equifax Info. Servs., LLC

Shames-Yeakel v. Citizens Financial Bank

LECTURES PUBLICATIONS

Third Circuit Refuses to Allow Litigant to Sidestep

*Its Chosen Arbitration Body's Rules
New Wave of Unlawful Medical Debt Collection in the Bud
Predatory Lending, the FCRA and the FDCPA*

*CFPB Tries to Nip
How Can I Combat Identity Theft*

LAUREN KW BRENNAN

EDUCATION

cum laude

ADMISSIONS

pro hac vice

NOTABLE CASES

Hernandez v. MicroBilt Corporation

Kelly v. RealPage, Inc.

Healy v. Milliman, Inc.,

Ramirez v. Trans Union, LLC

CLASS COUNSEL CERTIFICATIONS

Martinez v. Avantus, LLC,

McIntyre v. RealPage, Inc., d/b/a On-Site

Norman v. Trans Union, LLC,

Der-Hacopian v. DarkTrace, Inc.

Der-Hacopian v. SentryLink

Taylor v. GfK Custom Research, Inc.

Leo v. AppFolio, Inc

Clark/Anderson v. Trans Union, LLC

Kelly v. Business Information Group

Flores v. Express Personnel

Larson v. Trans Union, LLC,

Miller v. Trans Union, LLC

Henderson v. Trans Union, LLC,

Pawlowski v. United Tranzactions, LLC

Rodriguez v. Calvin Klein, Inc

Giddiens v. Infinity Staffing,

Giddiens v. First Advantage

Magallon v. Robert Half International, Inc.

Patel v. Trans Union, LLC

Blandina v. Midland Funding, LLC

Robinson v. General Information Services, Inc.

Ramirez v. Trans Union, LLC

LECTURES PUBLICATIONS

Consumer Financial Services Fundamentals 2024

Consumer Law Basics Webinar Series

Consumer Rights Litigation Conference

Spring Training Class Action Workshop

Spring Training - Case Valuation and Damages Track

Spring Training

Consumer Rights Litigation Conference

Spring Training – FCRA Track

FCRA Conference

DAVID A. SEARLES

Pennsylvania v. Davenport

CLASS ACTIONS

Lucas v. Accutrace, Inc.,
Kelly v. Business Information Group,
Gibbons v. Weltman, Weinberg & Reis Co., LPA,
Patel v. Trans Union, LLC,
Carter v. Shalhoub Management Company, Inc.,
Flores v. Express Services, Inc.,
Miller v. Trans Union, LLC
Larson v. Trans Union, LLC
Blandina v. Midland Funding, LLC,
King v. General Information Services, Inc
Robinson v. General Information Services, Inc
Jones v. Midland Funding, LLC
Sapp v. Experian Information Solutions, Inc.,
Reibstein v. Rite Aid Corporation,
McCall v. Drive Financial,
Serrano v. Sterling Testing Systems, Inc.,
Summerfield v. Equifax Information Services, LLC,
Chakejian v. Equifax Information Services, LLC,
Barel v. Bank of America,
Markocki v. Old Republic National Title Ins. Co.,

Strausser v. ACB Receivables Management, Inc.,
Allen v. Holiday Universal, Inc.,
Cohen v. Chicago Title Insurance Company,
Jordan v. Commonwealth Financial Systems, Inc.,
Braun v. Wal-Mart Stores, Inc.,
Perry v. FleetBoston Financial Corp.,
Beck v. Maximus, Inc.,
Stoner v. CBA Information Services,
Orloff v. Syndicated Office Systems, Inc.,
Petrolito v. Arrow Financial Services, LLC,
Piper v. Portnoff Law Associates, Ltd.,
Bonett v. Education Debt Services, Inc.,

GEOFFREY H. BASKERVILLE

Human Gene Therapy: Application, Ethics and Regulation

JORDAN M. SARTELL

summa cum laude

The Brief

CLASS COUNSEL CERTIFICATIONS

Schultz v. Emory University,

Botts v. The Johns Hopkins University,

Teran v. Navient Solutions, LLC et al

Stewart v. LexisNexis Risk Data Retrieval Serv's, LLC,

Rivera v. Equifax Info. Servs., LLC

Kang v. Credit Bureau Connection, Inc.

McIntyre v. RealPage, Inc., d/b/a On-Site

Norman v. Trans Union, LLC

Wills v. Starbucks Corporation

Robinson v. National Student Clearinghouse

aff'd

Shekar v. Accurate Background, Inc.

JOSEPH GENTILCORE

SIOBH N MCGREAL

ERIKA HEATH

Strickland v. Alexander

Strickland

Bowerman v. Field Asset Services, Inc

KEVIN MALLON

THE FIRM'S STAFF

Exhibit B

Date	Timekeeper	Narrative	Units	Rate	Value
Name:	David Searles				
02/08/19	David Searles	meeting to discuss case; email re issues in the case	0.40	\$875.00	\$350.00
06/14/19	David Searles	rev emails re expert input; rev file and reply to emails	0.40	\$875.00	\$350.00
06/17/19	David Searles	rev emails re meet and confer; call with potential expert re case	0.40	\$875.00	\$350.00
06/18/19	David Searles	rev 9th circuit decision on motion to dismiss TCPA claim	0.30	\$875.00	\$262.50
06/19/19	David Searles	conference call re discovery objections, with all counsel; follow up calls with co-counsel re discovery issues; rev case mgt order; follow up on pro hac motion	1.20	\$875.00	\$1,050.00
06/20/19	David Searles	rev memo re discovery disputes; email to expert re calling systems	0.30	\$875.00	\$262.50
06/26/19	David Searles	rev emails re disputed discovery issues	0.20	\$875.00	\$175.00
07/02/19	David Searles	rev defendant disclosures	0.20	\$875.00	\$175.00
07/08/19	David Searles	emails re conference re discovery	0.30	\$875.00	\$262.50
07/09/19	David Searles	prepare for and participate in conference call with co-counsel re discovery and other tasks to do	0.50	\$875.00	\$437.50
07/09/19	David Searles	draft 30b1 dep notices	0.40	\$875.00	\$350.00
07/10/19	David Searles	meeting re status of discovery	0.20	\$875.00	\$175.00
07/23/19	David Searles	emails re discovery and deposition deadlines; rvs deposition notices and get them out	0.50	\$875.00	\$437.50
09/03/19	David Searles	rev accumulated emails re document production and things to do going forward	0.50	\$875.00	\$437.50
09/05/19	David Searles	rev accumulated emails re discovery results and documents needed for deposition	0.30	\$875.00	\$262.50
09/09/19	David Searles	rev memo re results of deposition; conference call with co-counsel re results of deposition and things to do going forward; follow up meeting re expert reports due soon	1.60	\$875.00	\$1,400.00
09/10/19	David Searles	rev emails and memos to file re discovery and other assignments; research re TCPA class certification cases and element to be met under rule 23	1.20	\$875.00	\$1,050.00
09/11/19	David Searles	meet and confer with defense counsel; follow up meeting with co-counsel	0.80	\$875.00	\$700.00
09/16/19	David Searles	rev mails re discovery issues	0.30	\$875.00	\$262.50
09/17/19	David Searles	rev documents; conference call with plaintiff counsel; call re outstanding discovery	2.00	\$875.00	\$1,750.00
09/20/19	David Searles	emails re discovery due from plaintiff	0.20	\$875.00	\$175.00
09/26/19	David Searles	rev and calendar extended deadlines from court order	0.30	\$875.00	\$262.50
10/11/19	David Searles	rev email re deposition dates	0.20	\$875.00	\$175.00
10/12/19	David Searles	rev confidentiality designations	0.20	\$875.00	\$175.00
10/14/19	David Searles	rev emails re discovery disputes, depositions to be scheduled	0.50	\$875.00	\$437.50
10/16/19	David Searles	meeting with co-counsel re status of case, depositions coming up next month	0.50	\$875.00	\$437.50
10/16/19	David Searles	call among co-counsel re discovery disputes, upcoming depositions	0.50	\$875.00	\$437.50
11/04/19	David Searles	rev email response re document production and questions	0.30	\$875.00	\$262.50
11/11/19	David Searles	rev draft expert opinion	0.50	\$875.00	\$437.50
11/15/19	David Searles	rev letter re raw data used for expert reports	0.20	\$875.00	\$175.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/04/19	David Searles	meet re status of discovery, class cert issues	0.40	\$875.00	\$350.00
12/06/19	David Searles	track emails re confidentiality designations, mediation rules, etc	0.40	\$875.00	\$350.00
01/10/20	David Searles	meeting with co-counsel to discuss status of case and upcoming mediation; other tasks to do	0.30	\$875.00	\$262.50
01/27/20	David Searles	conference call among plaintiff counsel re upcoming mediation; conference call with mediator and all counsel	1.00	\$875.00	\$875.00
02/13/20	David Searles	email and research re CAFA notice issue	0.20	\$875.00	\$175.00
02/18/20	David Searles	discussion re results of mediation and things to do going forward	0.30	\$875.00	\$262.50
03/10/20	David Searles	emails re deps coming up	0.50	\$875.00	\$437.50
03/12/20	David Searles	rev and reply to emails re upcoming depositions; rsr rule on expert depositions	0.40	\$875.00	\$350.00
03/13/20	David Searles	emails with co-counsel, defense counsel and witness re deposition scheduling	0.50	\$875.00	\$437.50
03/19/20	David Searles	review and reply to emails re deadlines due to pandemic	0.50	\$875.00	\$437.50
03/20/20	David Searles	emails with co-counsel and defense counsel re call with mediator	0.20	\$875.00	\$175.00
03/24/20	David Searles	emails re additional attempts to mediate	0.30	\$875.00	\$262.50
03/30/20	David Searles	call among counsel re UHC investigation of calling records per mediator; follow up call with co-counsel re next steps	1.40	\$875.00	\$1,225.00
03/31/20	David Searles	emails re extension of motion deadlines; rev proposed amended complaint and motion for leave to file	1.30	\$875.00	\$1,137.50
04/01/20	David Searles	call with defense lawyer re motion for leave to amend, status of deadlines, etc.; follow up emails among plaintiff counsel	0.50	\$875.00	\$437.50
04/02/20	David Searles	rev emails and provisions of contested stipulation re extensions, deposition practice and motion deadlines	0.60	\$875.00	\$525.00
04/06/20	David Searles	review court order denying stipulation and follow up emails re depositions and scheduling at defendant s request	0.80	\$875.00	\$700.00
04/07/20	David Searles	emails re deposition to be done remotely, etc.	0.40	\$875.00	\$350.00
04/08/20	David Searles	emails re desposition procedures	0.30	\$875.00	\$262.50
04/08/20	David Searles	discuss status and pending issues with co-counsel	0.40	\$875.00	\$350.00
04/08/20	David Searles	rev motion and declarations re stay of case pending SCt decsion	0.70	\$875.00	\$612.50
04/09/20	David Searles	emails re pending motions; stipulation to amend complaint, etc.; rev draft amended complaint	0.50	\$875.00	\$437.50
04/10/20	David Searles	rev file and call in to conference with mediator re present status	0.50	\$875.00	\$437.50
04/10/20	David Searles	call among all counsel re information production, deposition scheduling and procedure and options for remote depositions	0.50	\$875.00	\$437.50
04/16/20	David Searles	emails re deposition to take place and procedures related thereto	0.50	\$875.00	\$437.50
04/17/20	David Searles	rev emails re deposition notices, third part discovery	0.50	\$875.00	\$437.50
04/27/20	David Searles	rev status memo re outstanding discovery and deposition issues, etc.	0.30	\$875.00	\$262.50

Date	Timekeeper	Narrative	Units	Rate	Value
04/30/20	David Searles	prepare for and participate in call about expert depositions; follow up re results of Kwon deposition	2.20	\$875.00	\$1,925.00
05/06/20	David Searles	research re Supreme Court argument on TCPA; discuss with co-counsel	1.70	\$875.00	\$1,487.50
05/07/20	David Searles	emails re dep of expert yesterday and another one coming up next week; discovery meet and confers, etc.	0.50	\$875.00	\$437.50
05/08/20	David Searles	prepare for and participate in call with co-counsel re deposition of expert coming up	1.00	\$875.00	\$875.00
05/12/20	David Searles	prepare for and participate n call with R. Snyder re deposition tomorrow; email defense counsel re same	1.60	\$875.00	\$1,400.00
05/13/20	David Searles	defend deposition of Randy Snyder; follow up emails and calls with co-counsel; compose summary of testimony and circulate among counsel	8.60	\$875.00	\$7,525.00
05/14/20	David Searles	call with expert and co-counsel re yesterday's deposition	0.50	\$875.00	\$437.50
05/14/20	David Searles	calls and emails re upcoming mediation; draft updated mediation statement	2.00	\$875.00	\$1,750.00
05/15/20	David Searles	work on draft update status letter to mediator; email with co-counsel re same; rev notices filed by UHC	0.90	\$875.00	\$787.50
05/17/20	David Searles	rev final mediation statement; rev doc request.	0.40	\$875.00	\$350.00
05/18/20	David Searles	emails re delivery of transcript and exhibits	0.20	\$875.00	\$175.00
05/26/20	David Searles	emails re 5th set document requests	0.30	\$875.00	\$262.50
06/04/20	David Searles	rev email from R. Snyder re dep; email to defense counsel re same	0.30	\$875.00	\$262.50
06/04/20	David Searles	rev supplemental authority re pending motion to stay	0.40	\$875.00	\$350.00
06/09/20	David Searles	research re TCPA motions to dismiss on various grounds, and motion to stay	0.50	\$875.00	\$437.50
06/10/20	David Searles	meeting re class cert motion	0.20	\$875.00	\$175.00
07/15/20	David Searles	rev decision on motion to stay; meeting re status of case	0.70	\$875.00	\$612.50
David Searles Total:			51.60		\$45,150.00

Name: Geoffrey Baskerville

12/09/18	Geoffrey Baskerville	Initial client interview	0.80	\$710.00	\$568.00
12/11/18	Geoffrey Baskerville	Review client file; prepare for and participate in attorney strategy meeting and discussion of class action	1.70	\$710.00	\$1,207.00
12/12/18	Geoffrey Baskerville	Discussion with Jordan Sartell re case facts	0.20	\$710.00	\$142.00
12/13/18	Geoffrey Baskerville	Discussion with client re class action treatment for his claims	0.30	\$710.00	\$213.00
01/06/19	Geoffrey Baskerville	Telephone call with client and co-counsel re facts of calls	0.50	\$710.00	\$355.00
01/07/19	Geoffrey Baskerville	Call with client to review draft complaint	0.30	\$710.00	\$213.00
Geoffrey Baskerville Total:			3.80		\$2,698.00

Name: Jim Francis

Date	Timekeeper	Narrative	Units	Rate	Value
12/20/18	Jim Francis	Review/edit and revise Kohn Swift complaint	3.00	\$840.00	\$2,520.00
01/02/19	Jim Francis	R/r emails from Jennifer Murray re questions, claims, facts; r/r edit complaint draft; work out and propose JPA	1.50	\$840.00	\$1,260.00
01/05/19	Jim Francis	Rev JM email re healthcare exemption issue; do westlaw research on healthcare exemption; draft memo to co-counsel re how to plead issues	2.50	\$840.00	\$2,100.00
01/07/19	Jim Francis	Prepare for 26 conf with OC; t/c with OC re changes to discovery plan	1.50	\$840.00	\$1,260.00
01/07/19	Jim Francis	R/r emails re amendments to complaint from JM, GHB;	1.20	\$840.00	\$1,008.00
02/05/19	Jim Francis	Reviewed ECF 1	0.10	\$840.00	\$84.00
02/05/19	Jim Francis	Reviewed ECF 2	0.10	\$840.00	\$84.00
02/05/19	Jim Francis	Reviewed ECF 3	0.10	\$840.00	\$84.00
02/06/19	Jim Francis	Reviewed ECF 4	0.10	\$840.00	\$84.00
02/06/19	Jim Francis	Reviewed ECF 5	0.10	\$840.00	\$84.00
02/08/19	Jim Francis	Reviewed ECF 6	0.10	\$840.00	\$84.00
02/08/19	Jim Francis	Reviewed ECF 7	0.10	\$840.00	\$84.00
02/08/19	Jim Francis	Reviewed ECF 8	0.10	\$840.00	\$84.00
02/12/19	Jim Francis	Reviewed ECF 9	0.10	\$840.00	\$84.00
02/13/19	Jim Francis	Reviewed ECF 10	0.10	\$840.00	\$84.00
02/13/19	Jim Francis	Reviewed ECF 11	0.10	\$840.00	\$84.00
02/20/19	Jim Francis	Reviewed ECF 12	0.10	\$840.00	\$84.00
02/20/19	Jim Francis	Reviewed ECF 13	0.10	\$840.00	\$84.00
02/20/19	Jim Francis	Reviewed ECF 14	0.10	\$840.00	\$84.00
02/20/19	Jim Francis	Reviewed ECF 15	0.10	\$840.00	\$84.00
02/20/19	Jim Francis	Reviewed ECF 16	0.10	\$840.00	\$84.00
02/21/19	Jim Francis	Reviewed ECF 17	0.10	\$840.00	\$84.00
02/21/19	Jim Francis	Reviewed ECF 18	0.10	\$840.00	\$84.00
02/21/19	Jim Francis	Reviewed ECF 19	0.10	\$840.00	\$84.00
02/21/19	Jim Francis	Reviewed ECF 20	0.10	\$840.00	\$84.00
02/21/19	Jim Francis	Reviewed ECF 21	0.10	\$840.00	\$84.00
02/21/19	Jim Francis	Reviewed ECF 25	0.10	\$840.00	\$84.00
02/22/19	Jim Francis	Reviewed ECF 22	0.10	\$840.00	\$84.00
02/22/19	Jim Francis	Reviewed ECF 23	0.10	\$840.00	\$84.00
02/22/19	Jim Francis	Reviewed ECF 24	0.10	\$840.00	\$84.00
02/27/19	Jim Francis	Reviewed ECF 26	0.10	\$840.00	\$84.00
02/27/19	Jim Francis	Reviewed ECF 27	0.10	\$840.00	\$84.00
02/27/19	Jim Francis	Reviewed ECF 28	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
02/27/19	Jim Francis	Reviewed ECF 29	0.10	\$840.00	\$84.00
02/27/19	Jim Francis	Reviewed ECF 30	0.10	\$840.00	\$84.00
02/27/19	Jim Francis	Reviewed ECF 31	0.10	\$840.00	\$84.00
02/28/19	Jim Francis	Reviewed ECF 32	0.10	\$840.00	\$84.00
03/01/19	Jim Francis	Reviewed ECF 33	0.10	\$840.00	\$84.00
03/14/19	Jim Francis	Reviewed ECF 34	0.10	\$840.00	\$84.00
03/28/19	Jim Francis	Reviewed ECF 35	0.10	\$840.00	\$84.00
03/28/19	Jim Francis	Reviewed ECF 36	0.10	\$840.00	\$84.00
04/03/19	Jim Francis	rev. Mot to STAY; draft rule 26f; PL resp. in OPP to Motion to STAY	2.00	\$840.00	\$1,680.00
04/03/19	Jim Francis	t/c w/CC re: OPP tp MTS & 26f report	0.70	\$840.00	\$588.00
04/08/19	Jim Francis	Reviewed ECF 37	0.10	\$840.00	\$84.00
04/10/19	Jim Francis	Reviewed ECF 38	0.10	\$840.00	\$84.00
04/12/19	Jim Francis	Reviewed ECF 39	0.10	\$840.00	\$84.00
04/15/19	Jim Francis	Reviewed ECF 40	0.10	\$840.00	\$84.00
05/20/19	Jim Francis	Reviewed ECF 41	0.10	\$840.00	\$84.00
05/30/19	Jim Francis	r/r corr. from OC, no settlement	0.20	\$840.00	\$168.00
05/31/19	Jim Francis	Reviewed ECF 42	0.10	\$840.00	\$84.00
05/31/19	Jim Francis	Reviewed ECF 43	0.10	\$840.00	\$84.00
06/03/19	Jim Francis	prepare for call with OC, review file; t/c with OC re settlement	2.00	\$840.00	\$1,680.00
06/03/19	Jim Francis	draft MTF re settlement discussion	1.00	\$840.00	\$840.00
06/18/19	Jim Francis	r/r emails re: M&C, protective order; talk w/DAS	1.00	\$840.00	\$840.00
06/18/19	Jim Francis	r/r emails re: M & C; protective order, discovery issues, meet w/DAS re: same	0.50	\$840.00	\$420.00
06/21/19	Jim Francis	Reviewed ECF 44	0.10	\$840.00	\$84.00
06/25/19	Jim Francis	Reviewed ECF 45	0.10	\$840.00	\$84.00
07/08/19	Jim Francis	Prepare for status call	0.80	\$840.00	\$672.00
07/08/19	Jim Francis	t/c w/CC re: dir./assignments	0.40	\$840.00	\$336.00
07/09/19	Jim Francis	Reviewed ECF 46	0.10	\$840.00	\$84.00
07/10/19	Jim Francis	Reviewed ECF 47	0.10	\$840.00	\$84.00
07/15/19	Jim Francis	Rev emails re: M & C; attend M & C	0.40	\$840.00	\$336.00
08/12/19	Jim Francis	Reviewed ECF 48	0.10	\$840.00	\$84.00
08/12/19	Jim Francis	Reviewed ECF 49	0.10	\$840.00	\$84.00
09/01/19	Jim Francis	review Defs 2nd document production; draft 30b6 topic for Frazier deposition	6.60	\$840.00	\$5,544.00
09/02/19	Jim Francis	begin prep of 30b6/Frazier dep in Green Bay	7.00	\$840.00	\$5,880.00
09/03/19	Jim Francis	continue rev of Def doc production 1 and 2 for 30b6 dep prep	7.70	\$840.00	\$6,468.00
09/04/19	Jim Francis	add l prep for first 30b6 dep/Adam Frazier dep	6.20	\$840.00	\$5,208.00

Date	Timekeeper	Narrative	Units	Rate	Value
09/05/19	Jim Francis	travel to Green Bay for dep of 30b6/Adam Frazier	11.50	\$840.00	\$9,660.00
09/06/19	Jim Francis	travel back from Green Bay from 30b6/Frazier dep	10.80	\$840.00	\$9,072.00
09/06/19	Jim Francis	take deposition of 30b6 and Adam Frazier in Green Bay	4.20	\$840.00	\$3,528.00
09/07/19	Jim Francis	draft follow-up memo re Frazier dep/next steps	4.50	\$840.00	\$3,780.00
09/16/19	Jim Francis	t/c with OC re calling data, expert call, discovery extension	0.80	\$840.00	\$672.00
09/24/19	Jim Francis	Reviewed ECF 50	0.10	\$840.00	\$84.00
09/25/19	Jim Francis	Reviewed ECF 51	0.10	\$840.00	\$84.00
09/26/19	Jim Francis	Reviewed ECF 52	0.10	\$840.00	\$84.00
09/30/19	Jim Francis	review file correspondence for prep of t/c with cc	1.00	\$840.00	\$840.00
09/30/19	Jim Francis	t/c with cc re amending complaint, new discovery to issue	0.80	\$840.00	\$672.00
10/01/19	Jim Francis	r/r email corr from cc re mediator/mediation dates, check calendar, meet with JS re same;	1.20	\$840.00	\$1,008.00
10/01/19	Jim Francis	draft f/u memo re depositions, yesterday s call and TDs for new discovery, assignments.	0.80	\$840.00	\$672.00
10/01/19	Jim Francis	Reviewed ECFs 53-60	0.70	\$840.00	\$588.00
10/01/19	Jim Francis	r/r corr from JM re new counsel for UHC, dep date continuances; review schedule file; r/r emails with JS re same	0.40	\$840.00	\$336.00
10/02/19	Jim Francis	Reviewed ECF 61	0.10	\$840.00	\$84.00
10/15/19	Jim Francis	read OC s letter re 30b6 topics and M&C; review file notes; t/c with cc re depositions and tomorrows call.	1.40	\$840.00	\$1,176.00
10/30/19	Jim Francis	t/c with OC re recent enrollment data.	0.30	\$840.00	\$252.00
11/05/19	Jim Francis	prepare for deposition of Sarah Paluczek	5.20	\$840.00	\$4,368.00
11/06/19	Jim Francis	Reviewed ECF 62	0.10	\$840.00	\$84.00
11/07/19	Jim Francis	prepare for dep Kevin McGavick	4.00	\$840.00	\$3,360.00
11/07/19	Jim Francis	take deposition of Sarah Paluczek	3.70	\$840.00	\$3,108.00
11/07/19	Jim Francis	draft follow-up memo re Paluczek dep/next steps	2.50	\$840.00	\$2,100.00
11/07/19	Jim Francis	t/c with OC re expert report, MTC	0.80	\$840.00	\$672.00
11/07/19	Jim Francis	Reviewed ECF 63	0.10	\$840.00	\$84.00
11/08/19	Jim Francis	take deposition of Kevin McGavick	4.20	\$840.00	\$3,528.00
11/08/19	Jim Francis	draft follow-up memo re McGavick dep/next steps	2.50	\$840.00	\$2,100.00
11/17/19	Jim Francis	review expert report, emails re M&C, dep transcript of McGavick	3.10	\$840.00	\$2,604.00
11/17/19	Jim Francis	t/c with OC re M&C	0.70	\$840.00	\$588.00
11/17/19	Jim Francis	t/c with JM re M&C	0.50	\$840.00	\$420.00
11/19/19	Jim Francis	rev dep transcript of S Palucek, make notes to file	1.20	\$840.00	\$1,008.00
11/20/19	Jim Francis	review McGavick dep transcript	1.00	\$840.00	\$840.00
11/27/19	Jim Francis	Reviewed ECF 64	0.10	\$840.00	\$84.00
11/27/19	Jim Francis	Reviewed ECF 65	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
11/30/19	Jim Francis	r/r email re plaintiff's retainer agreement; locate and review retainer agreement	0.70	\$840.00	\$588.00
12/01/19	Jim Francis	r/r plaintiff's responses and objs to def's discovery requests	1.50	\$840.00	\$1,260.00
12/01/19	Jim Francis	draft memo to file re outstanding items	1.50	\$840.00	\$1,260.00
12/01/19	Jim Francis	r/r emails re dep.; rev interrogatory responses	1.20	\$840.00	\$1,008.00
12/01/19	Jim Francis	t/c with JM re plaintiff's dep today	0.70	\$840.00	\$588.00
12/18/19	Jim Francis	r/r many emails re Anya's research and expert report re data;	0.50	\$840.00	\$420.00
12/25/19	Jim Francis	r/r/ emails from co-counsel re copycat case, develop and devise response, review Complaint and background on lawyers;	1.30	\$840.00	\$1,092.00
12/25/19	Jim Francis	review recent copycat Complaint from Texas; r/r emails with co-counsel re the same; discuss with JS	1.30	\$840.00	\$1,092.00
12/26/19	Jim Francis	review emails from last week, stipulations to dismiss WADAD claims, draft Amended Complaint, edit/revise amended complaint	1.20	\$840.00	\$1,008.00
12/26/19	Jim Francis	t/c with JM and BT re amended Complaint, recent Texas case, stip to dismiss and motion to stay	1.10	\$840.00	\$924.00
12/26/19	Jim Francis	edit/revise propose amended class definitions in amended complaint; r/r emails re the same;	0.60	\$840.00	\$504.00
12/30/19	Jim Francis	Reviewed ECF 66	0.10	\$840.00	\$84.00
12/31/19	Jim Francis	Reviewed ECF 67	0.10	\$840.00	\$84.00
12/31/19	Jim Francis	Reviewed ECF 68	0.10	\$840.00	\$84.00
12/31/19	Jim Francis	Reviewed ECF 69	0.10	\$840.00	\$84.00
01/15/20	Jim Francis	r/r emails from JM re discussions with Max; discuss same with JS	0.80	\$840.00	\$672.00
01/15/20	Jim Francis	t/c with CC re motion to amend, interim appt, mediation	0.60	\$840.00	\$504.00
02/06/20	Jim Francis	Reviewed ECF 70	0.10	\$840.00	\$84.00
02/10/20	Jim Francis	prepare for mediation in Seattle this week; review all settlement memoranda, dep transcripts and discovery	7.50	\$840.00	\$6,300.00
02/11/20	Jim Francis	travel to Seattle for Mediation with Lou Peterson	9.80	\$840.00	\$8,232.00
03/04/20	Jim Francis	Reviewed ECF 71	0.10	\$840.00	\$84.00
03/06/20	Jim Francis	Reviewed ECF 72	0.10	\$840.00	\$84.00
03/16/20	Jim Francis	t/c with CC re expert depositions and mediation this week	0.70	\$840.00	\$588.00
03/23/20	Jim Francis	t/c with OC and mediator re next steps; prepare for call	0.80	\$840.00	\$672.00
03/29/20	Jim Francis	t/c with OC re mediation, data required; t/c with CC immediately after re plan;	1.40	\$840.00	\$1,176.00
03/30/20	Jim Francis	draft mtf re call yesterday with OC and draft email to OC re positions re discovery and mediation	0.60	\$840.00	\$504.00
03/31/20	Jim Francis	t/c with all counsel re mediation and deadline extension, us moving forward with motion to amend and MCC	0.70	\$840.00	\$588.00
04/03/20	Jim Francis	Reviewed ECF 73	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
04/04/20	Jim Francis	r/r emails from JM re expert	0.20	\$840.00	\$168.00
04/06/20	Jim Francis	Reviewed ECF 74	0.10	\$840.00	\$84.00
04/08/20	Jim Francis	Reviewed ECF 75	0.10	\$840.00	\$84.00
04/08/20	Jim Francis	Reviewed ECF 76	0.10	\$840.00	\$84.00
04/08/20	Jim Francis	Reviewed ECF 77	0.10	\$840.00	\$84.00
04/09/20	Jim Francis	successive t/cs with mediator, OC and CC re mediation, numbers, motion to amend, JS	1.60	\$840.00	\$1,344.00
04/09/20	Jim Francis	Reviewed ECF 78	0.10	\$840.00	\$84.00
04/09/20	Jim Francis	Reviewed ECF 79	0.10	\$840.00	\$84.00
04/10/20	Jim Francis	review draft amended complaint, stip and all related email correspondence	1.80	\$840.00	\$1,512.00
04/10/20	Jim Francis	Reviewed ECF 80	0.10	\$840.00	\$84.00
04/14/20	Jim Francis	r/r emails and research on expert in prep for dep of expert Kwon	3.50	\$840.00	\$2,940.00
04/14/20	Jim Francis	Reviewed ECF 81	0.10	\$840.00	\$84.00
04/14/20	Jim Francis	Reviewed ECF 82	0.10	\$840.00	\$84.00
04/19/20	Jim Francis	WIP--review all Anya and Kwon reports, data cited in prep for Kwon dep;	5.50	\$840.00	\$4,620.00
04/19/20	Jim Francis	r/r emails re Kwon dep and mediation dates	0.40	\$840.00	\$336.00
04/20/20	Jim Francis	WIP--review all Anya and Kwon reports, data cited in prep for Kwon dep;	6.70	\$840.00	\$5,628.00
04/21/20	Jim Francis	WIP--review all Anya and Kwon reports, data cited in prep for Kwon dep;	9.00	\$840.00	\$7,560.00
04/21/20	Jim Francis	t/c with cc JM and expert Anya re prep for tomorrow dep of KWON	1.10	\$840.00	\$924.00
04/21/20	Jim Francis	Reviewed ECF 83	0.10	\$840.00	\$84.00
04/22/20	Jim Francis	prepare for Kwon Dep	5.30	\$840.00	\$4,452.00
04/22/20	Jim Francis	t/c with cc JM re dep and Anya supplement	0.60	\$840.00	\$504.00
04/22/20	Jim Francis	rev court order on stip order re amended complaint;	0.20	\$840.00	\$168.00
04/23/20	Jim Francis	take deposition of UHC expert Sonya Kwon	3.20	\$840.00	\$2,688.00
04/23/20	Jim Francis	draft follow up MTF re dep of expert	1.30	\$840.00	\$1,092.00
04/23/20	Jim Francis	Reviewed ECF 84	0.10	\$840.00	\$84.00
04/27/20	Jim Francis	Reviewed ECF 85	0.10	\$840.00	\$84.00
04/27/20	Jim Francis	Reviewed ECF 86	0.10	\$840.00	\$84.00
04/29/20	Jim Francis	review Kwon transcript and supplemental report to address question of whether to have Anya submit a supplemental report in advance of deposition;	3.00	\$840.00	\$2,520.00
04/29/20	Jim Francis	t/c with cc re Anya s dep prep	0.60	\$840.00	\$504.00
05/01/20	Jim Francis	Reviewed ECF 87	0.10	\$840.00	\$84.00
05/01/20	Jim Francis	Reviewed ECF 88	0.10	\$840.00	\$84.00
05/06/20	Jim Francis	rev/edit and revise plaintiff's motion for class cert	8.00	\$840.00	\$6,720.00
05/06/20	Jim Francis	Reviewed ECF 89	0.10	\$840.00	\$84.00
05/06/20	Jim Francis	Reviewed ECF 90	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
05/06/20	Jim Francis	Reviewed ECF 91	0.10	\$840.00	\$84.00
05/07/20	Jim Francis	review, edit and revise JAF decl in support of 23g/class cert, FMS bio; r/r emails with co-counsel re the same	5.00	\$840.00	\$4,200.00
05/07/20	Jim Francis	Reviewed ECF 92	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 100	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 93	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 94	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 95	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 96	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 97	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 98	0.10	\$840.00	\$84.00
05/08/20	Jim Francis	Reviewed ECF 99	0.10	\$840.00	\$84.00
05/10/20	Jim Francis	r/r emails re meet and confer, UHC s new counsel	0.40	\$840.00	\$336.00
05/11/20	Jim Francis	Reviewed ECF 101	0.10	\$840.00	\$84.00
05/11/20	Jim Francis	Reviewed ECF 102	0.10	\$840.00	\$84.00
05/11/20	Jim Francis	Reviewed ECF 103	0.10	\$840.00	\$84.00
05/12/20	Jim Francis	r/r emails from co-counsel re dep of Snyder; rev Snyder testimony in prep for Snyder dep; M&C	1.80	\$840.00	\$1,512.00
05/14/20	Jim Francis	draft mediation memo update to mediator; look through other TCPA settlements; review recent calls records/numbers;	7.00	\$840.00	\$5,880.00
05/14/20	Jim Francis	t/c with cc re demand, mediation memo, prep for mediation; send memo to mediator; meet with JS re the same	3.00	\$840.00	\$2,520.00
05/15/20	Jim Francis	Reviewed ECF 104	0.10	\$840.00	\$84.00
05/15/20	Jim Francis	Reviewed ECF 105	0.10	\$840.00	\$84.00
05/18/20	Jim Francis	attend Zoom mediation; prepare for same; debrief with cc after;	8.60	\$840.00	\$7,224.00
05/18/20	Jim Francis	prepare for mediation	2.60	\$840.00	\$2,184.00
05/26/20	Jim Francis	Reviewed ECF 106	0.10	\$840.00	\$84.00
05/26/20	Jim Francis	Reviewed ECF 107	0.10	\$840.00	\$84.00
06/02/20	Jim Francis	Reviewed ECF 108	0.10	\$840.00	\$84.00
06/03/20	Jim Francis	Reviewed ECF 109	0.10	\$840.00	\$84.00
06/04/20	Jim Francis	Reviewed ECF 110	0.10	\$840.00	\$84.00
06/05/20	Jim Francis	Reviewed ECF 111-127	1.90	\$840.00	\$1,596.00
06/08/20	Jim Francis	Reviewed ECF 128	0.10	\$840.00	\$84.00
06/09/20	Jim Francis	review class cert response; cases	4.00	\$840.00	\$3,360.00
06/09/20	Jim Francis	t/c with cc re class cert reply brief and mediation	1.10	\$840.00	\$924.00

Date	Timekeeper	Narrative	Units	Rate	Value
06/16/20	Jim Francis	Reviewed ECF 129	0.10	\$840.00	\$84.00
06/19/20	Jim Francis	Reviewed ECFs 130-139	1.00	\$840.00	\$840.00
06/23/20	Jim Francis	Reviewed ECF 140	0.10	\$840.00	\$84.00
06/24/20	Jim Francis	Reviewed ECF 141	0.10	\$840.00	\$84.00
06/24/20	Jim Francis	Reviewed ECF 142	0.10	\$840.00	\$84.00
06/24/20	Jim Francis	Reviewed ECF 143	0.10	\$840.00	\$84.00
06/24/20	Jim Francis	Reviewed ECF 144	0.10	\$840.00	\$84.00
06/26/20	Jim Francis	Reviewed ECF 145	0.10	\$840.00	\$84.00
06/26/20	Jim Francis	Reviewed ECF 146	0.10	\$840.00	\$84.00
06/29/20	Jim Francis	Reviewed ECF 147	0.10	\$840.00	\$84.00
07/01/20	Jim Francis	Reviewed ECF 148	0.10	\$840.00	\$84.00
07/06/20	Jim Francis	Reviewed ECF 149	0.10	\$840.00	\$84.00
07/06/20	Jim Francis	Reviewed ECF 150	0.10	\$840.00	\$84.00
07/13/20	Jim Francis	Reviewed ECF 151	0.10	\$840.00	\$84.00
07/13/20	Jim Francis	Reviewed ECF 152	0.10	\$840.00	\$84.00
07/14/20	Jim Francis	Reviewed Notice from Court re Stay of case	0.30	\$840.00	\$252.00
07/14/20	Jim Francis	Reviewed ECF 153	0.10	\$840.00	\$84.00
07/27/20	Jim Francis	read courts decision re stay; discuss with JS, set up call with everyone to discuss next steps	1.20	\$840.00	\$1,008.00
08/31/20	Jim Francis	t/c with contractor re identifying additional plaintiffs	1.10	\$840.00	\$924.00
01/13/21	Jim Francis	Reviewed ECF 154	0.10	\$840.00	\$84.00
01/28/21	Jim Francis	Reviewed ECF 155	0.10	\$840.00	\$84.00
07/28/21	Jim Francis	Reviewed ECF 156	0.10	\$840.00	\$84.00
08/17/21	Jim Francis	Reviewed ECF 157	0.10	\$840.00	\$84.00
08/19/21	Jim Francis	Reviewed ECF 158	0.10	\$840.00	\$84.00
08/19/21	Jim Francis	Reviewed ECF 159	0.10	\$840.00	\$84.00
02/17/22	Jim Francis	Reviewed ECF 160	0.10	\$840.00	\$84.00
02/17/22	Jim Francis	Reviewed ECF 161	0.10	\$840.00	\$84.00
02/17/22	Jim Francis	Reviewed ECF 162	0.10	\$840.00	\$84.00
08/16/22	Jim Francis	Reviewed ECF 163	0.10	\$840.00	\$84.00
08/16/22	Jim Francis	Reviewed ECF 164	0.10	\$840.00	\$84.00
08/16/22	Jim Francis	Reviewed ECF 165	0.10	\$840.00	\$84.00
08/18/22	Jim Francis	Reviewed Notice from Court scheduling Hearing Date	0.20	\$840.00	\$168.00
08/28/22	Jim Francis	review status of other cases for evaluating petition to reopen;	2.30	\$840.00	\$1,932.00
08/28/22	Jim Francis	t/c with cc re petition to lift the stay and file amended complaint	0.80	\$840.00	\$672.00
09/01/22	Jim Francis	Reviewed ECF 166	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
09/01/22	Jim Francis	Reviewed ECF 167	0.10	\$840.00	\$84.00
09/15/22	Jim Francis	work on motion to reopen/lift stay, t/cs/emails with JM re same;	5.50	\$840.00	\$4,620.00
09/16/22	Jim Francis	Reviewed ECF 168-179	0.30	\$840.00	\$252.00
12/20/22	Jim Francis	Reviewed ECF 171	0.10	\$840.00	\$84.00
12/27/22	Jim Francis	review court order reopening case and all MCC filed materials for prep of call with CC	3.20	\$840.00	\$2,688.00
12/27/22	Jim Francis	t/c with cc re renewed motion for class cert, discovery updates	0.80	\$840.00	\$672.00
01/04/23	Jim Francis	review JS and JM emails re follow up discovery since stay; respond; review record and call number info in file;	1.30	\$840.00	\$1,092.00
01/19/23	Jim Francis	Reviewed ECF 173-179	1.00	\$840.00	\$840.00
01/20/23	Jim Francis	Reviewed ECF 180	0.30	\$840.00	\$252.00
02/02/23	Jim Francis	Reviewed ECF 181	0.30	\$840.00	\$252.00
02/02/23	Jim Francis	Reviewed ECF 182	0.30	\$840.00	\$252.00
02/03/23	Jim Francis	Reviewed ECF 183	0.30	\$840.00	\$252.00
02/03/23	Jim Francis	Reviewed ECF 184	0.30	\$840.00	\$252.00
02/09/23	Jim Francis	Reviewed ECF 185	0.30	\$840.00	\$252.00
02/09/23	Jim Francis	Reviewed ECF 186	0.30	\$840.00	\$252.00
02/10/23	Jim Francis	Reviewed ECF 187	0.30	\$840.00	\$252.00
02/14/23	Jim Francis	Reviewed ECF 188	0.10	\$840.00	\$84.00
02/21/23	Jim Francis	Reviewed ECF 189-203	1.50	\$840.00	\$1,260.00
02/22/23	Jim Francis	Reviewed ECF 204-218	1.50	\$840.00	\$1,260.00
02/24/23	Jim Francis	Reviewed ECF 219	0.10	\$840.00	\$84.00
02/24/23	Jim Francis	Reviewed ECF 220	0.10	\$840.00	\$84.00
02/27/23	Jim Francis	Reviewed ECF 221	0.10	\$840.00	\$84.00
03/03/23	Jim Francis	Reviewed ECF 222-233	1.00	\$840.00	\$840.00
03/06/23	Jim Francis	Reviewed ECF 231	0.10	\$840.00	\$84.00
03/06/23	Jim Francis	Reviewed ECF 232	0.10	\$840.00	\$84.00
03/07/23	Jim Francis	Reviewed ECF 233	0.10	\$840.00	\$84.00
03/08/23	Jim Francis	review draft 26f, Def's Sur-reply re class cert; class cert briefing	5.00	\$840.00	\$4,200.00
03/08/23	Jim Francis	t/c with cc re JSR and plan	0.80	\$840.00	\$672.00
03/08/23	Jim Francis	Reviewed ECF 234	0.10	\$840.00	\$84.00
03/10/23	Jim Francis	Reviewed ECF 235	0.10	\$840.00	\$84.00
03/12/23	Jim Francis	zoom with JM re JSR	0.90	\$840.00	\$756.00
03/12/23	Jim Francis	zoom with OC re JSR	0.80	\$840.00	\$672.00
03/20/23	Jim Francis	Reviewed ECF 236	0.10	\$840.00	\$84.00
03/24/23	Jim Francis	Reviewed ECF 237	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
03/28/23	Jim Francis	Reviewed ECF 238	0.10	\$840.00	\$84.00
04/13/23	Jim Francis	Reviewed ECF 239	0.10	\$840.00	\$84.00
05/16/23	Jim Francis	Reviewed ECF 240	0.10	\$840.00	\$84.00
05/16/23	Jim Francis	Reviewed ECF 241	0.10	\$840.00	\$84.00
06/08/23	Jim Francis	Reviewed ECF 242	0.10	\$840.00	\$84.00
06/15/23	Jim Francis	prepare for call with OC re settlement; review all recent filings	2.00	\$840.00	\$1,680.00
06/15/23	Jim Francis	t/c with OC re settlement renewal; emails with cc re the same	0.80	\$840.00	\$672.00
06/19/23	Jim Francis	t/c with cc re settlement talks; OC re the same	1.70	\$840.00	\$1,428.00
06/20/23	Jim Francis	Zoom with cc re settlement discussions	0.80	\$840.00	\$672.00
06/21/23	Jim Francis	Reviewed ECF 243	0.10	\$840.00	\$84.00
06/23/23	Jim Francis	Reviewed ECF 244	0.10	\$840.00	\$84.00
07/06/23	Jim Francis	Reviewed ECF 245	0.30	\$840.00	\$252.00
07/06/23	Jim Francis	Reviewed ECF 246	0.10	\$840.00	\$84.00
07/06/23	Jim Francis	Reviewed ECF 247	0.10	\$840.00	\$84.00
07/13/23	Jim Francis	zoom with CC re settlement strategy, class size	1.10	\$840.00	\$924.00
07/14/23	Jim Francis	review, edit and revise settlement demand email to OC; JPA with Matlock group, review history of discovery for class size,; emails related to class size	5.50	\$840.00	\$4,620.00
08/03/23	Jim Francis	mediation follow up; review MOU; discuss with JS	3.50	\$840.00	\$2,940.00
08/04/23	Jim Francis	r/r emails re settlement; edit and revise JPA with Friedman group;	2.10	\$840.00	\$1,764.00
08/04/23	Jim Francis	mediation follow up	1.20	\$840.00	\$1,008.00
08/04/23	Jim Francis	Reviewed ECF 248	0.10	\$840.00	\$84.00
08/05/23	Jim Francis	mediation follow up; r/r emails with JM	1.30	\$840.00	\$1,092.00
08/07/23	Jim Francis	review and revise JPA from Friedman group; speak with JM re the same and counter/approach	1.20	\$840.00	\$1,008.00
08/08/23	Jim Francis	t/c with Beth and Jen re California JPA	0.40	\$840.00	\$336.00
08/08/23	Jim Francis	Reviewed ECF 249	0.10	\$840.00	\$84.00
08/09/23	Jim Francis	prepare for mediation; read all recent email and correspondence	5.50	\$840.00	\$4,620.00
08/10/23	Jim Francis	attend mediation	6.50	\$840.00	\$5,460.00
08/14/23	Jim Francis	confer with cc re mediator s proposal	2.10	\$840.00	\$1,764.00
08/14/23	Jim Francis	Reviewed ECF 250	0.10	\$840.00	\$84.00
08/15/23	Jim Francis	Reviewed ECF 251	0.10	\$840.00	\$84.00
08/16/23	Jim Francis	Emails w. LB re review of her draft term sheet	0.40	\$840.00	\$336.00
08/16/23	Jim Francis	Reviewed email from cc re mediation	0.10	\$840.00	\$84.00
08/19/23	Jim Francis	Email to John Soumilas re mediator s proposal	0.10	\$840.00	\$84.00
08/19/23	Jim Francis	Email from mediator memorializing mediation	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
08/21/23	Jim Francis	Reviewed ECF 252	0.10	\$840.00	\$84.00
08/21/23	Jim Francis	Reviewed ECF 253	0.10	\$840.00	\$84.00
08/22/23	Jim Francis	Reviewed email from co-counsel re joint status report review	0.50	\$840.00	\$420.00
08/22/23	Jim Francis	Emails w. co-counsel re joint status report review	0.10	\$840.00	\$84.00
08/22/23	Jim Francis	Emails with all counsel re consent to add sig to re-not of sealing motion	0.10	\$840.00	\$84.00
08/22/23	Jim Francis	Reviewed ECF 254	0.10	\$840.00	\$84.00
08/22/23	Jim Francis	Reviewed ECF 255	0.10	\$840.00	\$84.00
08/28/23	Jim Francis	Reviewed ECF 256	0.10	\$840.00	\$84.00
08/30/23	Jim Francis	Reviewed email from co-counsel re mediator s proposal	0.50	\$840.00	\$420.00
08/30/23	Jim Francis	Emails with all counsel re re-sealing motion	0.10	\$840.00	\$84.00
08/30/23	Jim Francis	Reviewed ECF 257	0.10	\$840.00	\$84.00
08/31/23	Jim Francis	Emails w. all counsel re joint status report revisions	0.20	\$840.00	\$168.00
08/31/23	Jim Francis	Reviewed ECF 258	0.10	\$840.00	\$84.00
09/06/23	Jim Francis	Emails with all counsel re joint status report revisions	0.20	\$840.00	\$168.00
09/06/23	Jim Francis	Reviewed ECF 259	0.10	\$840.00	\$84.00
09/07/23	Jim Francis	Emails with all counsel re joint status report revisions	0.20	\$840.00	\$168.00
09/08/23	Jim Francis	Reviewed ECF 260	0.10	\$840.00	\$84.00
09/13/23	Jim Francis	Emails with all counsel re hearing for motion for class cert	0.10	\$840.00	\$84.00
09/14/23	Jim Francis	Emails w. courtroom dep and all counsel re hearing on motion for class cert logistics	0.50	\$840.00	\$420.00
09/26/23	Jim Francis	Reviewed email from JK re hearing for motion for class cert	0.10	\$840.00	\$84.00
09/26/23	Jim Francis	Reviewed email from JK re Oral Argument	0.10	\$840.00	\$84.00
10/03/23	Jim Francis	Email from Jennifer Murray to expert requesting time for meeting	0.10	\$840.00	\$84.00
10/04/23	Jim Francis	review all refiled briefs in prep for class cert oral argument tomorrow	6.00	\$840.00	\$5,040.00
10/04/23	Jim Francis	Email to co-counsel re preparation of oral argument	0.10	\$840.00	\$84.00
10/04/23	Jim Francis	Reviewed email from co-counsel re call prior to oral argument logistics	0.10	\$840.00	\$84.00
10/04/23	Jim Francis	Email from Judge s Clerk re questions in advance of oral argument	0.10	\$840.00	\$84.00
10/05/23	Jim Francis	attend class certification oral argument	2.50	\$840.00	\$2,100.00
10/05/23	Jim Francis	Reviewed email from JS re settlement	0.10	\$840.00	\$84.00
10/05/23	Jim Francis	Reviewed ECF 261	0.10	\$840.00	\$84.00
10/05/23	Jim Francis	Reviewed ECF 262	0.10	\$840.00	\$84.00
10/06/23	Jim Francis	Reviewed email from co-counsel re Dec. of Michelle Klatt	0.10	\$840.00	\$84.00
10/10/23	Jim Francis	Reviewed ECF 263	0.10	\$840.00	\$84.00
10/10/23	Jim Francis	Reviewed ECF 264	0.10	\$840.00	\$84.00
10/11/23	Jim Francis	Reviewed ECF 265	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
10/13/23	Jim Francis	review court's decision granting class cert; r/r emails with co-counsel re next steps; draft memo to file.	3.50	\$840.00	\$2,940.00
10/13/23	Jim Francis	Emails w. co-counsel re Order Granting Renewed Mot for Class Cert	1.60	\$840.00	\$1,344.00
10/13/23	Jim Francis	Reviewed email from JS re Order Granting Renewed Mot for Class Cert	0.10	\$840.00	\$84.00
10/13/23	Jim Francis	Reviewed email from co-counsel re mediation strategy	0.10	\$840.00	\$84.00
10/13/23	Jim Francis	Reviewed email from co-counsel re settlement administrators	0.10	\$840.00	\$84.00
10/13/23	Jim Francis	Reviewed ECF 266	0.10	\$840.00	\$84.00
10/16/23	Jim Francis	Emails w. co-counsel re meet and confer logistics	0.70	\$840.00	\$588.00
10/16/23	Jim Francis	zoom with cc re notice deadlines; begin working on FMS duties	0.60	\$840.00	\$504.00
10/16/23	Jim Francis	Email from Terrel Marshall re updated notice bid numbers	0.30	\$840.00	\$252.00
10/16/23	Jim Francis	Reviewed email from co-counsel re settlement administrator bids/planning	0.10	\$840.00	\$84.00
10/16/23	Jim Francis	Email re plan for notice strategy call	0.10	\$840.00	\$84.00
10/16/23	Jim Francis	Email from def counsel re meet and confer logistics	0.10	\$840.00	\$84.00
10/16/23	Jim Francis	Email from Angeion Group requesting to bid for administration	0.10	\$840.00	\$84.00
10/17/23	Jim Francis	discuss bid with Frank Barkan; meet with JS re the same	1.20	\$840.00	\$1,008.00
10/17/23	Jim Francis	Emails from co-counsel re administration bids	0.50	\$840.00	\$420.00
10/17/23	Jim Francis	Emails w. potential notice vendor w. bid	0.40	\$840.00	\$336.00
10/17/23	Jim Francis	Emails w. Frank Barkan re notice	0.20	\$840.00	\$168.00
10/17/23	Jim Francis	Email to administrator advising of class certification	0.10	\$840.00	\$84.00
10/17/23	Jim Francis	Reviewed ECF 267	0.10	\$840.00	\$84.00
10/17/23	Jim Francis	Reviewed ECF 268	0.10	\$840.00	\$84.00
10/18/23	Jim Francis	Reviewed email from co-counsel re Rule 23(f) petition division of labor	0.10	\$840.00	\$84.00
10/18/23	Jim Francis	Email to co-counsel re administration proposal	0.10	\$840.00	\$84.00
10/18/23	Jim Francis	Email from JMS circulating draft notices	0.10	\$840.00	\$84.00
10/18/23	Jim Francis	Email from CDL w. their bid	0.10	\$840.00	\$84.00
10/18/23	Jim Francis	Reviewed ECF 269	0.10	\$840.00	\$84.00
10/19/23	Jim Francis	Strategy emails to co-counsel re notice plan and upcoming call w. defco	0.50	\$840.00	\$420.00
10/19/23	Jim Francis	Reviewed email from co-counsel re class cert motion strategy	0.40	\$840.00	\$336.00
10/19/23	Jim Francis	Reviewed email from defco re logistics for phone call meet and confer	0.40	\$840.00	\$336.00
10/19/23	Jim Francis	Emails w. defense counsel re logistics for phone call	0.40	\$840.00	\$336.00
10/19/23	Jim Francis	Reviewed email from co-counsel re draft notices	0.10	\$840.00	\$84.00
10/19/23	Jim Francis	Email to co-counsel memorializing call re phone call w. def co	0.10	\$840.00	\$84.00
10/19/23	Jim Francis	Reviewed email from co-counsel re phone call w. def co	0.10	\$840.00	\$84.00
10/19/23	Jim Francis	Email to def counsel re proposed form of notice and plan	0.10	\$840.00	\$84.00
10/20/23	Jim Francis	Reviewed email from co-counsel re notice plan	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
10/20/23	Jim Francis	Emails with all counsel re Stip Mtn to Approve Notice Plan	0.10	\$840.00	\$84.00
10/20/23	Jim Francis	Email from potential notice vendor w. bid	0.10	\$840.00	\$84.00
10/21/23	Jim Francis	Emails with all counsel re meet and confer	0.20	\$840.00	\$168.00
10/22/23	Jim Francis	Reviewed email from co-counsel re meet and confer	0.30	\$840.00	\$252.00
10/23/23	Jim Francis	review notice bids; t/c with JM re the same	1.50	\$840.00	\$1,260.00
10/23/23	Jim Francis	Reviewed email from co-counsel re notice strategy	0.50	\$840.00	\$420.00
10/23/23	Jim Francis	Reviewed email from co-counsel re settlement administrator bids/planning	0.10	\$840.00	\$84.00
10/23/23	Jim Francis	Reviewed email from co-counsel re notice plan	0.10	\$840.00	\$84.00
10/24/23	Jim Francis	Reviewed email from co-counsel re notice proposals	0.50	\$840.00	\$420.00
10/24/23	Jim Francis	Reviewed email from co-counsel re language for joint submission re notice	0.50	\$840.00	\$420.00
10/24/23	Jim Francis	Reviewed email from co-counsel re vendor bids for notice	0.50	\$840.00	\$420.00
10/24/23	Jim Francis	Reviewed email from potential administrator re bids	0.30	\$840.00	\$252.00
10/24/23	Jim Francis	Reviewed email from to co-counsel re meet and confer - notice	0.20	\$840.00	\$168.00
10/24/23	Jim Francis	Emailf from Shub circulating bids received for administration	0.10	\$840.00	\$84.00
10/24/23	Jim Francis	Reviewed ECF 270	0.10	\$840.00	\$84.00
10/25/23	Jim Francis	Emails with all counsel re meet and confer - notice	0.20	\$840.00	\$168.00
10/27/23	Jim Francis	Emails with all counsel re meet and confer - notice	0.50	\$840.00	\$420.00
10/27/23	Jim Francis	Reviewed email from all SA re notice requirements	0.10	\$840.00	\$84.00
10/27/23	Jim Francis	Email from def counsel serving copy of Rule 23f petition	0.10	\$840.00	\$84.00
10/28/23	Jim Francis	Emails with all counsel re Stip Mtn to Approve Notice Plan	0.10	\$840.00	\$84.00
10/28/23	Jim Francis	Email from settlement administrator w. draft press release	0.10	\$840.00	\$84.00
10/28/23	Jim Francis	Email re division of labor for response to Rule 23f petition	0.10	\$840.00	\$84.00
10/29/23	Jim Francis	Email to co-counsel re Rule 23f response	0.10	\$840.00	\$84.00
10/30/23	Jim Francis	Emails with all counsel re meet and confer - notice	1.60	\$840.00	\$1,344.00
10/30/23	Jim Francis	Emails w. all counsel re meet and confer about notice plan	0.10	\$840.00	\$84.00
10/30/23	Jim Francis	Email btw co-counsel and SA - receipt of documents	0.10	\$840.00	\$84.00
10/30/23	Jim Francis	Email from Frank Barkan re proposed estimates to administer notice program	0.10	\$840.00	\$84.00
10/30/23	Jim Francis	Reviewed ECF 271	0.10	\$840.00	\$84.00
10/30/23	Jim Francis	Reviewed ECF 272	0.10	\$840.00	\$84.00
10/30/23	Jim Francis	Reviewed ECF 273	0.10	\$840.00	\$84.00
11/01/23	Jim Francis	Reviewed ECF 274	0.10	\$840.00	\$84.00
11/03/23	Jim Francis	Email from co-counsel circulating draft answer to petition	0.10	\$840.00	\$84.00
11/04/23	Jim Francis	Reviewed email from Amanda Steiner circulating draft 26f petition answer	0.10	\$840.00	\$84.00
11/06/23	Jim Francis	Email from Jonathan Shub w. edits to 26f petition answer	0.10	\$840.00	\$84.00
11/07/23	Jim Francis	Reviewed Docket Notification from Court	0.30	\$840.00	\$252.00

Date	Timekeeper	Narrative	Units	Rate	Value
11/07/23	Jim Francis	Reviewed ECF 275	0.10	\$840.00	\$84.00
11/08/23	Jim Francis	Reviewed ECF 276	0.10	\$840.00	\$84.00
11/09/23	Jim Francis	Reviewed ECF 277	0.10	\$840.00	\$84.00
11/14/23	Jim Francis	Reviewed email from defense counsel re initial disclosures	0.10	\$840.00	\$84.00
11/16/23	Jim Francis	Emails w. co-counsel re strategy for addressing supplemental disclosur	0.30	\$840.00	\$252.00
11/16/23	Jim Francis	Reviewed email from co-counsel re initial disclosures	0.10	\$840.00	\$84.00
11/16/23	Jim Francis	Email from Jennifer Murray to Defense Counsel re amended pleadings	0.10	\$840.00	\$84.00
11/16/23	Jim Francis	Email from def counsel re amending pleadings	0.10	\$840.00	\$84.00
11/17/23	Jim Francis	Reviewed emails from co-counsel re proposed stip to file amended complaint	0.20	\$840.00	\$168.00
11/17/23	Jim Francis	Emails w defense counsel re amended pleadings	0.20	\$840.00	\$168.00
11/17/23	Jim Francis	Email w all counsel re D s raised issue re answer to amended complaint	0.10	\$840.00	\$84.00
11/17/23	Jim Francis	Reviewed email w co-counsel re D s raised issue re answer to amended complaint	0.10	\$840.00	\$84.00
11/17/23	Jim Francis	Email from defense counsel re amended pleadings	0.10	\$840.00	\$84.00
11/17/23	Jim Francis	Email from Jen Murray to administrator w. executed engagement letter	0.10	\$840.00	\$84.00
11/17/23	Jim Francis	Email from Jennifer Murray re review of proposal	0.10	\$840.00	\$84.00
11/20/23	Jim Francis	Reviewed emails btw co-counsel and potential notice vendor	0.30	\$840.00	\$252.00
11/22/23	Jim Francis	Email from Jon Shub w. edits to Resp to MTD brief	0.10	\$840.00	\$84.00
11/22/23	Jim Francis	Email from Jennifer Murray w. draft resp to MTD	0.10	\$840.00	\$84.00
11/23/23	Jim Francis	Email from Jennifer Murray circulating Resp to MTD	0.10	\$840.00	\$84.00
11/27/23	Jim Francis	Reviewed email from co-counsel re Resp to Mtn to Dismiss	0.10	\$840.00	\$84.00
11/27/23	Jim Francis	Reviewed email from co-counsel re MTD response brief (draft language included in body of email)	0.10	\$840.00	\$84.00
11/27/23	Jim Francis	Email from Jennifer Murray circulating draft notice plan	0.10	\$840.00	\$84.00
11/27/23	Jim Francis	Email to Jennifer Murray re review of Resp to MTD draft	0.10	\$840.00	\$84.00
11/27/23	Jim Francis	Reviewed email from co-counsel re edits to Resp to MTD draft	0.10	\$840.00	\$84.00
11/27/23	Jim Francis	Reviewed ECF 278	0.10	\$840.00	\$84.00
12/01/23	Jim Francis	Reviewed ECF 279	0.10	\$840.00	\$84.00
12/05/23	Jim Francis	Email from co-counsel approving subpoena process	0.10	\$840.00	\$84.00
12/05/23	Jim Francis	Email to co-counsel re FMS taking lead on unnamed call agents in revised disclosurs	0.10	\$840.00	\$84.00
12/05/23	Jim Francis	Reviewed Docket Notification from Court - Striking Prior ECF	0.10	\$840.00	\$84.00
12/05/23	Jim Francis	Reviewed ECF 280	0.10	\$840.00	\$84.00
12/14/23	Jim Francis	review DEF UHC supplemental initial disclosures; perform legal research/WL on Rule 26a re specific identification of witnesses; draft letter to UHC re deficient disclosures	3.50	\$840.00	\$2,940.00
12/14/23	Jim Francis	Email to co-counsel re strategy for addressing supplemental disclosur	0.30	\$840.00	\$252.00
12/14/23	Jim Francis	Reviewed emails from co-counsel re appellate decision	0.20	\$840.00	\$168.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/14/23	Jim Francis	Reviewed email from JS re appellate order	0.10	\$840.00	\$84.00
12/14/23	Jim Francis	Email to defense counsel re deficient supplemental disclosures	0.10	\$840.00	\$84.00
12/14/23	Jim Francis	Reviewed ECF 282	0.10	\$840.00	\$84.00
12/15/23	Jim Francis	draft M&C letter to OC re deficient supplemental disclosures; do legal research re preclusion/sanctions	3.00	\$840.00	\$2,520.00
12/18/23	Jim Francis	Reviewed email from co-counsel re joint status report draft	0.10	\$840.00	\$84.00
12/18/23	Jim Francis	Email from defense counsel re discovery disputes	0.10	\$840.00	\$84.00
12/18/23	Jim Francis	Email from Blythe Chandler to co-counsel w. proposed joint status report draft	0.10	\$840.00	\$84.00
12/18/23	Jim Francis	Email from Jodi Nuss serving copies of subpoenas	0.10	\$840.00	\$84.00
12/18/23	Jim Francis	Reviewed ECF 281	0.10	\$840.00	\$84.00
12/19/23	Jim Francis	Strategy email from Blythe Chandler re notice research	0.10	\$840.00	\$84.00
12/19/23	Jim Francis	Email re notice administration from Jennifer Murray	0.10	\$840.00	\$84.00
12/20/23	Jim Francis	Email from defense counsel re advising court denial of Rule 23f petition	0.10	\$840.00	\$84.00
12/27/23	Jim Francis	Reviewed emails from co-counsel re draft language for email advising court of 9th Circuit 23f decision	0.80	\$840.00	\$672.00
12/27/23	Jim Francis	Reviewed emails from co-counsel re notice to class members	0.30	\$840.00	\$252.00
12/27/23	Jim Francis	Reviewed email from co-counsel notice to court requesting stay on notice	0.10	\$840.00	\$84.00
12/27/23	Jim Francis	Reviewed email sfrom co-counsel re M&C motion/strategy	0.10	\$840.00	\$84.00
12/28/23	Jim Francis	Read and reviewed emails from co-counsel re response to d s suppl. disclosures	1.90	\$840.00	\$1,596.00
12/28/23	Jim Francis	Emails with all counsel re stipulated motion	0.20	\$840.00	\$168.00
12/28/23	Jim Francis	Reviewed email from co-counsel re Joint Status Report	0.10	\$840.00	\$84.00
12/28/23	Jim Francis	Emails with all counsel re stip to lift stay	0.10	\$840.00	\$84.00
12/29/23	Jim Francis	Emails with all counsel re suppl. disclosures	0.30	\$840.00	\$252.00
12/29/23	Jim Francis	Reviewed emails from co-counsel re response to d s suppl. disclosures	0.20	\$840.00	\$168.00
12/29/23	Jim Francis	Email w co-counsel re discovery disputes	0.10	\$840.00	\$84.00
12/29/23	Jim Francis	Email to defense counsel re submitting joint status report	0.10	\$840.00	\$84.00
01/03/24	Jim Francis	Reviewed email from co-counsel re joint status report strategy	0.50	\$840.00	\$420.00
01/03/24	Jim Francis	Reviewed email from co-counsel re meet and confer re stipulated protective order	0.10	\$840.00	\$84.00
01/03/24	Jim Francis	Emails with all counsel re class list	0.10	\$840.00	\$84.00
01/03/24	Jim Francis	Reviewed email from all co-counsel re discovery strategy	0.10	\$840.00	\$84.00
01/03/24	Jim Francis	Emails with all counsel re amended protective order draft/edits	0.10	\$840.00	\$84.00
01/03/24	Jim Francis	Reviewed ECF 283	0.10	\$840.00	\$84.00
01/04/24	Jim Francis	prepare for M&C re UHC supplemental disclosures and Joint status report	1.50	\$840.00	\$1,260.00
01/04/24	Jim Francis	zoom call with OC re M&C re UHC supplemental disclosures	0.50	\$840.00	\$420.00
01/10/24	Jim Francis	Emails with all counsel re joint status report strategy	0.60	\$840.00	\$504.00

Date	Timekeeper	Narrative	Units	Rate	Value
01/11/24	Jim Francis	Reviewed email from co-counsel re stipulated protective order	0.10	\$840.00	\$84.00
01/11/24	Jim Francis	Reviewed ECF 284	0.10	\$840.00	\$84.00
01/12/24	Jim Francis	Reviewed email from co-counsel re D s Draft Joint Status Report	0.10	\$840.00	\$84.00
01/12/24	Jim Francis	Reviewed ECF 285	0.10	\$840.00	\$84.00
01/12/24	Jim Francis	Reviewed ECF 286	0.10	\$840.00	\$84.00
01/13/24	Jim Francis	Reviewed email from co-counsel re joint status report strategy	0.20	\$840.00	\$168.00
01/15/24	Jim Francis	Email w co-counsel re Joint Status Report edits	0.30	\$840.00	\$252.00
01/15/24	Jim Francis	Email to Jennifer Murray w. status report edits	0.10	\$840.00	\$84.00
01/15/24	Jim Francis	Email from Jennifer Murray w. proposed revisions to Joint Status Report	0.10	\$840.00	\$84.00
01/16/24	Jim Francis	review joint status report; edit plaintiff's section; r/r emails with Jen	1.50	\$840.00	\$1,260.00
01/16/24	Jim Francis	Emails with all counsel re stipulated motion/joint status report	0.40	\$840.00	\$336.00
01/16/24	Jim Francis	Reviewed ECF 287	0.10	\$840.00	\$84.00
01/17/24	Jim Francis	Emails with all counsel re stipulated motion/joint status report	1.00	\$840.00	\$840.00
01/17/24	Jim Francis	Reviewed email from co-counsel re fee petition preparation	0.10	\$840.00	\$84.00
01/17/24	Jim Francis	Email from Jennifer Murray re thoughts on proposed stips	0.10	\$840.00	\$84.00
01/17/24	Jim Francis	Email from Jennifer Murray w. revised draft of status report	0.10	\$840.00	\$84.00
01/18/24	Jim Francis	Email from Jennifer Murray to CDL re Order granting production of Verizon data	0.10	\$840.00	\$84.00
01/18/24	Jim Francis	Reviewed ECF 288	0.10	\$840.00	\$84.00
01/22/24	Jim Francis	Email w co-counsel re Class List	0.10	\$840.00	\$84.00
01/22/24	Jim Francis	Reviewed email from co-counsel re Verizon Subpoena Response	0.10	\$840.00	\$84.00
01/22/24	Jim Francis	Reviewed email from paralegals re doc production	0.10	\$840.00	\$84.00
01/22/24	Jim Francis	Reviewed email from paralegals re Verizon Subpoena Response	0.10	\$840.00	\$84.00
01/22/24	Jim Francis	Email from Jennifer Murray re review of notice to PA Verizon customers	0.10	\$840.00	\$84.00
01/22/24	Jim Francis	Email from Frank Barkan circulating draft PA Verizon notice	0.10	\$840.00	\$84.00
01/23/24	Jim Francis	Email from Jennifer Murray re review of notice to PA Verizon customers	0.10	\$840.00	\$84.00
01/29/24	Jim Francis	Reviewed ECF 289	0.10	\$840.00	\$84.00
01/29/24	Jim Francis	Reviewed ECF 290	0.10	\$840.00	\$84.00
01/30/24	Jim Francis	Emails with all counsel re meet and confer on Verizon and AT&T Motions	0.30	\$840.00	\$252.00
02/04/24	Jim Francis	Reviewed email from def counsel re logistics of Michelle Klatt deposition	0.10	\$840.00	\$84.00
02/05/24	Jim Francis	Reviewed email from co-counsel re deposition logistics	0.10	\$840.00	\$84.00
02/05/24	Jim Francis	Emails with all counsel deposition logistics	0.10	\$840.00	\$84.00
02/06/24	Jim Francis	Reviewed email from courtroom dep and all counsel re hearing on motion to dismiss logistics	0.30	\$840.00	\$252.00
02/06/24	Jim Francis	Reviewed email from Courtroom Deputy re hearing on Motion to Dismiss	0.10	\$840.00	\$84.00
02/06/24	Jim Francis	Emails with all counsel re hearing for motion for class cert	0.10	\$840.00	\$84.00
02/06/24	Jim Francis	Emails with all counsel and courtroom deputy re oral argument logistics	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
02/06/24	Jim Francis	Emails with all counsel re oral argument logistics	0.10	\$840.00	\$84.00
02/07/24	Jim Francis	Reviewed email from co-counsel re Motion Hearing	0.20	\$840.00	\$168.00
02/07/24	Jim Francis	Reviewed Docket Notification from Court - Setting Hearing	0.20	\$840.00	\$168.00
02/07/24	Jim Francis	Reviewed email from RB re hearing scheduling	0.10	\$840.00	\$84.00
02/07/24	Jim Francis	Forwarding Order Scheduling Motion Hearing	0.10	\$840.00	\$84.00
02/07/24	Jim Francis	Emails with all counsel deposition logistics	0.10	\$840.00	\$84.00
02/07/24	Jim Francis	Reviewed ECF 291	0.10	\$840.00	\$84.00
02/09/24	Jim Francis	Reviewed ECF 292	0.10	\$840.00	\$84.00
02/09/24	Jim Francis	Reviewed ECF 293	0.10	\$840.00	\$84.00
02/13/24	Jim Francis	Emails with all counsel deposition logistics	0.30	\$840.00	\$252.00
02/13/24	Jim Francis	Reviewed email from co-counsel/JK re deposition logistics	0.20	\$840.00	\$168.00
02/13/24	Jim Francis	Reviewed email from JK re scheduling dep of Klatt	0.10	\$840.00	\$84.00
02/13/24	Jim Francis	Reviewed email from co-counsel/JK re drafted dep notice	0.10	\$840.00	\$84.00
02/14/24	Jim Francis	Reviewed email from co-counsel re Motion Hearing	0.20	\$840.00	\$168.00
02/14/24	Jim Francis	Reviewed email from JK re Klatt deposition notice	0.10	\$840.00	\$84.00
02/15/24	Jim Francis	review all briefing and cases re UHC motion to dismiss non-Washington class members; Bristol-Myers recent caselaw	5.50	\$840.00	\$4,620.00
02/15/24	Jim Francis	Reviewed email from co-counsel/JK re deposition logistics	0.60	\$840.00	\$504.00
02/15/24	Jim Francis	Reviewed email from JK re Klatt deposition notice	0.10	\$840.00	\$84.00
02/15/24	Jim Francis	Reviewed email from co-counsel/JK re edits to deposition notice	0.10	\$840.00	\$84.00
02/15/24	Jim Francis	Reviewed email from co-counsel re Motion Hearing	0.10	\$840.00	\$84.00
02/15/24	Jim Francis	Email from JK serving notice of Klatt dep	0.10	\$840.00	\$84.00
02/16/24	Jim Francis	prepare for mock argument on MTD non-Washington class members	3.00	\$840.00	\$2,520.00
02/16/24	Jim Francis	attend and participate in mock arg on MTD non-Washington class members	1.10	\$840.00	\$924.00
02/16/24	Jim Francis	Reviewed email from co-counsel re Motion Hearing	0.60	\$840.00	\$504.00
02/16/24	Jim Francis	Email re case strategy meeting w. FMS attorneys and paralegals	0.10	\$840.00	\$84.00
02/16/24	Jim Francis	Reviewed email from JMS and JK re UHC production	0.10	\$840.00	\$84.00
02/16/24	Jim Francis	Reviewed email from def co re production letter	0.10	\$840.00	\$84.00
02/17/24	Jim Francis	Reviewed email from co-counsel re discovery strategy planning	0.50	\$840.00	\$420.00
02/17/24	Jim Francis	Reviewed email from co-counsel re UHC doc production letter	0.10	\$840.00	\$84.00
02/21/24	Jim Francis	prepare for oral argument on MTD non-washington claims; scour docket and scheduling orders to prepare for scheduling discussion	2.00	\$840.00	\$1,680.00
02/21/24	Jim Francis	attend oral argument on MTD on non-washington claims	0.70	\$840.00	\$588.00
02/21/24	Jim Francis	Email w co-counsel re draft status report	0.60	\$840.00	\$504.00
02/21/24	Jim Francis	Emails with all counsel and courtroom deputy re oral argument logistics	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
02/21/24	Jim Francis	Reviewed email from co-counsel re discovery strategy planning	0.10	\$840.00	\$84.00
02/21/24	Jim Francis	Reviewed ECF 294	0.10	\$840.00	\$84.00
02/22/24	Jim Francis	Reviewed email from co-counsel re Motion Hearing	0.60	\$840.00	\$504.00
02/22/24	Jim Francis	Reviewed email from co-counsel re objection to call production	0.10	\$840.00	\$84.00
02/25/24	Jim Francis	Reviewed email from JK re Dep of Michelle Klatt preparaton	0.10	\$840.00	\$84.00
02/26/24	Jim Francis	Email from RB re Michelle Klatt dep prep	0.30	\$840.00	\$252.00
02/26/24	Jim Francis	Reviewed email from RB re preparation for Dep of Michelle Klatt	0.10	\$840.00	\$84.00
02/26/24	Jim Francis	Email from Jon Shub re reviewing call recordings	0.10	\$840.00	\$84.00
02/26/24	Jim Francis	Email from def counsel w. objections and response to NOVD of Klatt	0.10	\$840.00	\$84.00
02/26/24	Jim Francis	Email to RB re Michelle Klatt dep prep	0.10	\$840.00	\$84.00
02/26/24	Jim Francis	Reviewed email from co-counsel re discovery issues/tasks	0.10	\$840.00	\$84.00
02/27/24	Jim Francis	prepare for deposition of new witness Klatt; review all briefing and history of case	7.20	\$840.00	\$6,048.00
02/27/24	Jim Francis	Email to RB re deposition details	0.10	\$840.00	\$84.00
02/27/24	Jim Francis	Email to co-counsel w. draft language in response to extensive doc production	0.10	\$840.00	\$84.00
02/27/24	Jim Francis	Email from def counsel requesting dep credentials	0.10	\$840.00	\$84.00
02/27/24	Jim Francis	Email from RB circulating dep credentials	0.10	\$840.00	\$84.00
02/27/24	Jim Francis	Email from RB w. unredacted version of motion for class cert	0.10	\$840.00	\$84.00
02/28/24	Jim Francis	prepare for Klatt deposition	4.00	\$840.00	\$3,360.00
02/28/24	Jim Francis	take deposition of M. Klatt; w/r emails with cc re dep highlights	3.50	\$840.00	\$2,940.00
02/28/24	Jim Francis	draft follow-up memo re Klatt dep/next steps	2.50	\$840.00	\$2,100.00
02/28/24	Jim Francis	Email w court reporter re Klatt deposition transcript rough	0.10	\$840.00	\$84.00
02/28/24	Jim Francis	Reviewed email from co-counsel re Klatt deposition transcript review	0.10	\$840.00	\$84.00
02/29/24	Jim Francis	Email from Judge s clerk advising of timeline re Motion to Dismiss Order	0.10	\$840.00	\$84.00
02/29/24	Jim Francis	Reviewed ECF 295	0.10	\$840.00	\$84.00
03/01/24	Jim Francis	Email w co-counsel re Draft LT United Re Objection to Call Recordings	0.10	\$840.00	\$84.00
03/01/24	Jim Francis	Reviewed email from co-counsel re Odder Denying Motion to Dismiss ECF 277	0.10	\$840.00	\$84.00
03/04/24	Jim Francis	Reviewed ECF 296	0.10	\$840.00	\$84.00
03/07/24	Jim Francis	review OC letter re class discovery dispute, JM response; r/r emails with cc re how to handle new call recordings and new witnesses	1.40	\$840.00	\$1,176.00
03/07/24	Jim Francis	Reviewed email from co-counsel re discovery strategy	0.20	\$840.00	\$168.00
03/07/24	Jim Francis	Reviewed email from co-counsel re Correspondence re Call Recording Production	0.10	\$840.00	\$84.00
03/07/24	Jim Francis	Email from def counsel serving call recording production correspondence	0.10	\$840.00	\$84.00
03/07/24	Jim Francis	Email from def counsel serving doc production	0.10	\$840.00	\$84.00
03/08/24	Jim Francis	Reviewed email from co-counsel re discovery strategy	1.20	\$840.00	\$1,008.00
03/08/24	Jim Francis	Reviewed email from co-counsel re Correspondence re Call Recording Production	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
03/08/24	Jim Francis	Reviewed email from co-counsel re UHC production letter	0.10	\$840.00	\$84.00
03/08/24	Jim Francis	Email to co-counsel re discovery strategy	0.10	\$840.00	\$84.00
03/13/24	Jim Francis	Emails with all counsel re class list assembly updates/questions	0.20	\$840.00	\$168.00
03/13/24	Jim Francis	Reviewed email from Defense Counsel re class list assembly	0.10	\$840.00	\$84.00
03/13/24	Jim Francis	Reviewed email from co-counsel and defense counsel re Order on Verizon Subpoena	0.10	\$840.00	\$84.00
03/18/24	Jim Francis	Reviewed email from co-counsel re analysis of call recordings	0.20	\$840.00	\$168.00
03/18/24	Jim Francis	Reviewed email from court reporter re Michelle Klatt Deposition	0.10	\$840.00	\$84.00
03/18/24	Jim Francis	Reviewed email from co-counsel Klatt dep transcript	0.10	\$840.00	\$84.00
03/18/24	Jim Francis	Reviewed email from co-counsel re transcription of phone calls	0.10	\$840.00	\$84.00
03/18/24	Jim Francis	Reviewed email from co-counsel and defense counsel re Motion re TMobile Subpoena	0.10	\$840.00	\$84.00
03/18/24	Jim Francis	Reviewed ECF 297	0.10	\$840.00	\$84.00
03/19/24	Jim Francis	Reviewed emails from co-counsel re next-steps meeting logistics	0.80	\$840.00	\$672.00
03/19/24	Jim Francis	Reviewed email from co-counsel and defense counsel re Motion re TMobile Subpoena	0.30	\$840.00	\$252.00
03/19/24	Jim Francis	Reviewed ECF 298	0.10	\$840.00	\$84.00
03/19/24	Jim Francis	Reviewed ECF 299	0.10	\$840.00	\$84.00
03/20/24	Jim Francis	Reviewed email from co-counsel re discovery protocol	0.10	\$840.00	\$84.00
03/20/24	Jim Francis	Reviewed email from co-counsel re discovery strategy	0.10	\$840.00	\$84.00
03/21/24	Jim Francis	Email from court reporter re Klatt deposition PIP sync	0.10	\$840.00	\$84.00
03/21/24	Jim Francis	Email from Jodi Nuss re Recording Review Protocol/Training	0.10	\$840.00	\$84.00
03/21/24	Jim Francis	Email from Jodi Nuss re recording review training logistics	0.10	\$840.00	\$84.00
03/22/24	Jim Francis	Reviewed ECF 300	0.10	\$840.00	\$84.00
03/26/24	Jim Francis	Email from Frank Barkan re preparation of PA Verizon notice	0.10	\$840.00	\$84.00
03/26/24	Jim Francis	Email from Frank Barkan re Verizon PA subscriber notice	0.10	\$840.00	\$84.00
03/28/24	Jim Francis	Reviewed email from co-counsel re AT&T production (original natives)	0.10	\$840.00	\$84.00
04/02/24	Jim Francis	review and edit Joint status report, past correspondence with OC re call recordings, 1800 agents	3.20	\$840.00	\$2,688.00
04/02/24	Jim Francis	Emails w. co-counsel re strategy call logistics	0.70	\$840.00	\$588.00
04/02/24	Jim Francis	Email from co-counsel re 26F scheduling	0.10	\$840.00	\$84.00
04/02/24	Jim Francis	Emails w. co-counsel re scheduling 26f	0.10	\$840.00	\$84.00
04/02/24	Jim Francis	Email to Jennifer Murray circulating edits to Joint Status Report	0.10	\$840.00	\$84.00
04/02/24	Jim Francis	Email from defense counsel re 26f scheduling	0.10	\$840.00	\$84.00
04/02/24	Jim Francis	Reviewed email from co-counsel re 26f planning	0.10	\$840.00	\$84.00
04/02/24	Jim Francis	Email from Jennifer Murray requesting dates for 26f conference	0.10	\$840.00	\$84.00
04/03/24	Jim Francis	t/c with cc re JSR approach; prepare for call	1.20	\$840.00	\$1,008.00
04/03/24	Jim Francis	Reviewed email from co-counsel re Joint Status Report edits	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
04/08/24	Jim Francis	Reviewed email from co-counsel re JSR	0.10	\$840.00	\$84.00
04/08/24	Jim Francis	Reviewed email from co-counsel re JSR research	0.10	\$840.00	\$84.00
04/08/24	Jim Francis	Email from def co transmitting correspondence	0.10	\$840.00	\$84.00
04/09/24	Jim Francis	Reviewed email from co-counsel re Avaya documents and research	0.30	\$840.00	\$252.00
04/09/24	Jim Francis	Email from TM sending doc production to co-counsel	0.10	\$840.00	\$84.00
04/09/24	Jim Francis	Emails with all counsel re Joint Scheduling Report drafting/edits	0.10	\$840.00	\$84.00
04/12/24	Jim Francis	review Def's edits and revisions to 26f report, emails with co-counsel re same and past schedules	2.10	\$840.00	\$1,764.00
04/12/24	Jim Francis	zoom 26f conf with OC	0.80	\$840.00	\$672.00
04/12/24	Jim Francis	t/c with co-counsel in advance of 26f	0.50	\$840.00	\$420.00
04/12/24	Jim Francis	Reviewed email from co-counsel re call on JSR edits	0.20	\$840.00	\$168.00
04/12/24	Jim Francis	Reviewed emails from co-counsel re call about Joint Status Report	0.10	\$840.00	\$84.00
04/16/24	Jim Francis	Emails with all counsel re Joint Scheduling Report drafting/edits	0.40	\$840.00	\$336.00
04/16/24	Jim Francis	Reviewed email from co-counsel re strategy call logistics	0.20	\$840.00	\$168.00
04/16/24	Jim Francis	Emails with all counsel re Joint Scheduling Report drafting/edits	0.20	\$840.00	\$168.00
04/16/24	Jim Francis	Reviewed email from co-counsel re answering machine code request letter	0.10	\$840.00	\$84.00
04/16/24	Jim Francis	Reviewed email from co-counsel re order to meet and confer	0.10	\$840.00	\$84.00
04/16/24	Jim Francis	Reviewed ECF 301	0.10	\$840.00	\$84.00
04/17/24	Jim Francis	Reviewed email from co-counsel re d's production letter	0.10	\$840.00	\$84.00
04/17/24	Jim Francis	Reviewed email from co-counsel re strategy call logistics	0.10	\$840.00	\$84.00
04/17/24	Jim Francis	Emails with all counsel re Joint Scheduling Report drafting/edits	0.10	\$840.00	\$84.00
04/18/24	Jim Francis	Reviewed email from co-counsel re Joint Scheduling Report edits	0.80	\$840.00	\$672.00
04/19/24	Jim Francis	Reviewed emails from co-counsel and def co re Joint Scheduling Report	0.20	\$840.00	\$168.00
04/19/24	Jim Francis	Reviewed emails from co-counsel re initial disclosures	0.10	\$840.00	\$84.00
04/19/24	Jim Francis	Reviewed email from co-counsel re strategy/preparation of initial disclosures	0.10	\$840.00	\$84.00
04/19/24	Jim Francis	Reviewed email from co-counsel re initial disclosures	0.10	\$840.00	\$84.00
04/22/24	Jim Francis	Reviewed emails from co-counsel re Joint Scheduling Report edits	0.50	\$840.00	\$420.00
04/22/24	Jim Francis	Reviewed email from co counsel re T-Mobile Subpoena Response	0.10	\$840.00	\$84.00
04/22/24	Jim Francis	Reviewed email from defense counsel re supplemental disclosures	0.10	\$840.00	\$84.00
04/22/24	Jim Francis	Reviewed email from co-counsel re 26f scheduling	0.10	\$840.00	\$84.00
04/22/24	Jim Francis	Reviewed email from co-counsel re P's supplemental initial disclosures	0.10	\$840.00	\$84.00
04/22/24	Jim Francis	Reviewed email from co-counsel re Joint Scheduling Report	0.10	\$840.00	\$84.00
04/23/24	Jim Francis	Reviewed email from co-counsel and def co re Joint Scheduling Report	0.80	\$840.00	\$672.00
04/23/24	Jim Francis	Reviewed email from co-counsel re AT&T production	0.10	\$840.00	\$84.00
04/23/24	Jim Francis	Reviewed ECF 302	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
04/24/24	Jim Francis	Reviewed email from co-counsel and def co re Joint Scheduling Report	0.20	\$840.00	\$168.00
04/24/24	Jim Francis	Reviewed email from co-counsel re Joint Scheduling Report edits	0.10	\$840.00	\$84.00
05/01/24	Jim Francis	Email from co-counsel serving letter re objection to call recordings	0.10	\$840.00	\$84.00
05/04/24	Jim Francis	Email from MW w. credentials for Paluczak dep	0.10	\$840.00	\$84.00
05/07/24	Jim Francis	Reviewed email from co-counsel re deposition logistics	0.20	\$840.00	\$168.00
05/07/24	Jim Francis	Reviewed email from co-counsel re Dep of Sarah Paluczak	0.10	\$840.00	\$84.00
05/07/24	Jim Francis	Reviewed email from MW re Dep of Sarah Paluczak	0.10	\$840.00	\$84.00
05/07/24	Jim Francis	Reviewed email from co-counsel re draft notice of dep	0.10	\$840.00	\$84.00
05/07/24	Jim Francis	Email to FMS staff re dep logistics	0.10	\$840.00	\$84.00
05/07/24	Jim Francis	Reviewed email from co-counsel re dep logistics	0.10	\$840.00	\$84.00
05/07/24	Jim Francis	Email to Jennifer Murray re review of draft Dep Notice	0.10	\$840.00	\$84.00
05/08/24	Jim Francis	Reviewed email from co-counsel staff re review of recordings	0.30	\$840.00	\$252.00
05/12/24	Jim Francis	Reviewed email from MW re doc production letter	0.10	\$840.00	\$84.00
05/13/24	Jim Francis	Email from JMS re dep prep	0.10	\$840.00	\$84.00
05/13/24	Jim Francis	Email to JMS re dep prep	0.10	\$840.00	\$84.00
05/14/24	Jim Francis	Email from def co to MW serving production	0.10	\$840.00	\$84.00
05/15/24	Jim Francis	prepare for deposition of S Paluzak--review declarations, prior dep; latest doc production, t/c with Jordan and Jen	6.00	\$840.00	\$5,040.00
05/15/24	Jim Francis	prepare for deposition of Sarah Paluczak-read prior testimony, declarations, draft exam	5.50	\$840.00	\$4,620.00
05/15/24	Jim Francis	Reviewed email from JMS and MW re Deposition Preparation of Sarah Paluczak	0.10	\$840.00	\$84.00
05/15/24	Jim Francis	Email re Zoom information for Paluczak deposition	0.10	\$840.00	\$84.00
05/15/24	Jim Francis	Emails with all counsel re dep logistics for Paluczak dep	0.10	\$840.00	\$84.00
05/16/24	Jim Francis	zoom with cc re class size changes, data, notice, Paluzak dep	0.80	\$840.00	\$672.00
05/16/24	Jim Francis	Email to MW re cancellation of dep	0.10	\$840.00	\$84.00
05/16/24	Jim Francis	Email from co-counsel serving NOI	0.10	\$840.00	\$84.00
05/20/24	Jim Francis	Email from def counsel serving doc production	0.20	\$840.00	\$168.00
05/22/24	Jim Francis	Reviewed email from co-counsel staff re review of recordings	0.10	\$840.00	\$84.00
05/22/24	Jim Francis	Reviewed email from co-counsel re discovery timeline	0.10	\$840.00	\$84.00
05/24/24	Jim Francis	Reviewed ECF 303	0.10	\$840.00	\$84.00
05/24/24	Jim Francis	Reviewed ECF 304	0.10	\$840.00	\$84.00
05/27/24	Jim Francis	Emails from def counsel serving doc production	0.20	\$840.00	\$168.00
05/27/24	Jim Francis	Email from def counsel serving production letter	0.10	\$840.00	\$84.00
05/28/24	Jim Francis	Email to MW re production of audio files	0.10	\$840.00	\$84.00
05/28/24	Jim Francis	Email to MW re doc production	0.10	\$840.00	\$84.00
05/28/24	Jim Francis	Reviewed email from co-counsel re analysis of production	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
05/28/24	Jim Francis	Reviewed email from co-counsel re division of labor for production analysis	0.10	\$840.00	\$84.00
06/04/24	Jim Francis	Email from Jennifer Murray re trial task list	0.10	\$840.00	\$84.00
06/06/24	Jim Francis	Reviewed email from co-counsel re trial task list call	0.10	\$840.00	\$84.00
06/11/24	Jim Francis	Emails with all counsel re production of call recordings	0.40	\$840.00	\$336.00
06/11/24	Jim Francis	Email from def counsel re doc production technological issues	0.10	\$840.00	\$84.00
06/11/24	Jim Francis	Email from co-counsel to def counsel re unreadable files	0.10	\$840.00	\$84.00
06/13/24	Jim Francis	Email from Jennifer Murray requesting dates for call recording project meeting	0.10	\$840.00	\$84.00
06/14/24	Jim Francis	Reviewed email from co-counsel re d s proposed extension to produce call recordings	0.10	\$840.00	\$84.00
06/14/24	Jim Francis	Emails with all counsel stipulated motion to produce call recordings and id-ing call-agent witnesses	0.10	\$840.00	\$84.00
06/14/24	Jim Francis	Reviewed email from co-counsel re extension for D to produce call recordings	0.10	\$840.00	\$84.00
06/14/24	Jim Francis	Email from co-counsel seeking extension of production of call recordings/call agent id	0.10	\$840.00	\$84.00
06/16/24	Jim Francis	Email from co-counsel re pre-trial tasks	0.10	\$840.00	\$84.00
06/17/24	Jim Francis	Emails with all counsel stipulated motion edits	0.40	\$840.00	\$336.00
06/17/24	Jim Francis	Reviewed email from co-counsel re d s proposed motion to extend	0.10	\$840.00	\$84.00
06/17/24	Jim Francis	Reviewed email from co-counsel stipulated motion edits	0.10	\$840.00	\$84.00
06/17/24	Jim Francis	Emails from def counsel serving doc production	0.10	\$840.00	\$84.00
06/17/24	Jim Francis	Reviewed ECF 305	0.10	\$840.00	\$84.00
06/18/24	Jim Francis	Email from co-counsel to def counsel re unreadable files	0.10	\$840.00	\$84.00
06/18/24	Jim Francis	Reviewed ECF 306	0.10	\$840.00	\$84.00
06/20/24	Jim Francis	review recent emails, UHC supplemental call recording production in prep for strategy meeting with co-counsel	2.30	\$840.00	\$1,932.00
06/20/24	Jim Francis	Emails w co-counsel re team strategy call logistics	0.30	\$840.00	\$252.00
06/20/24	Jim Francis	Email re team strategy call logistics	0.30	\$840.00	\$252.00
06/20/24	Jim Francis	Emails with all counsel re addnl production	0.30	\$840.00	\$252.00
06/20/24	Jim Francis	Email from co-counsel re strategy call logistics	0.20	\$840.00	\$168.00
06/21/24	Jim Francis	attend zoom strategy with cc re call recording production from UHC; supplemental disclosures, expert witness selection, depositions of call agents	0.80	\$840.00	\$672.00
06/21/24	Jim Francis	Emails with all counsel re addnl production	0.20	\$840.00	\$168.00
06/24/24	Jim Francis	Emails with all counsel re addnl production	0.40	\$840.00	\$336.00
06/24/24	Jim Francis	Emails with all counsel re production of call recordings	0.20	\$840.00	\$168.00
06/25/24	Jim Francis	Reviewed emails from co-counsel re D s supp. declaration	0.40	\$840.00	\$336.00
06/25/24	Jim Francis	Email from defense serving supplemental disclosures	0.10	\$840.00	\$84.00
06/25/24	Jim Francis	Email to Jennifer Murray re proposed class definition	0.10	\$840.00	\$84.00
06/25/24	Jim Francis	Reviewed email from co-counsel re do not call class definition	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
07/01/24	Jim Francis	Email from Frank Barkan re preparation of PA TMobile and At&T subscriber data	0.20	\$840.00	\$168.00
07/01/24	Jim Francis	Email from CDL re compliaance w. subpoenas re subscriber data	0.10	\$840.00	\$84.00
07/02/24	Jim Francis	Reviewed email from co-counsel re S Cellular Subpoena Response	0.10	\$840.00	\$84.00
07/04/24	Jim Francis	Email re Meet and Confere re Motion for Class Decertification and proposed class list production	0.10	\$840.00	\$84.00
07/05/24	Jim Francis	Emails w. co-counsel re organizing standing call	0.40	\$840.00	\$336.00
07/05/24	Jim Francis	Emails w. co-counsel re organizing standing call	0.30	\$840.00	\$252.00
07/05/24	Jim Francis	Reviewed email from co-counsel re class list production	0.10	\$840.00	\$84.00
07/05/24	Jim Francis	Email from def co re proposed schedule	0.10	\$840.00	\$84.00
07/05/24	Jim Francis	Email from co-counsel to def counsel re proposed schedule	0.10	\$840.00	\$84.00
07/05/24	Jim Francis	Email to co-counsel re organizing standing call	0.10	\$840.00	\$84.00
07/08/24	Jim Francis	Email to MW re noticing deps	0.10	\$840.00	\$84.00
07/08/24	Jim Francis	Email from MW circulating draft dep notices	0.10	\$840.00	\$84.00
07/08/24	Jim Francis	Email from MW serving NODs	0.10	\$840.00	\$84.00
07/08/24	Jim Francis	Email to co-counsel re serving dep notices	0.10	\$840.00	\$84.00
07/08/24	Jim Francis	Reviewed email from co-counsel re serving dep notices	0.10	\$840.00	\$84.00
07/10/24	Jim Francis	zoom with cc re call recordings, agents, next steps	0.80	\$840.00	\$672.00
07/10/24	Jim Francis	Email from JM to co-counsel sending team meeting agenda	0.10	\$840.00	\$84.00
07/10/24	Jim Francis	Email from def counsel requesting position on req for overlength brief	0.10	\$840.00	\$84.00
07/10/24	Jim Francis	Email from JM to def co re class list assembly	0.10	\$840.00	\$84.00
07/10/24	Jim Francis	Strategy mail w. co-counsel re d s page limit extension request	0.10	\$840.00	\$84.00
07/11/24	Jim Francis	Reviewed email from co-counsel re d s request for extension of page limits	0.30	\$840.00	\$252.00
07/11/24	Jim Francis	Email from co-counsel to def counsel re position on motion for overlength	0.10	\$840.00	\$84.00
07/11/24	Jim Francis	Email from def co re class notice and discovery issues	0.10	\$840.00	\$84.00
07/11/24	Jim Francis	Email from JM sending call transcription	0.10	\$840.00	\$84.00
07/11/24	Jim Francis	Reviewed email from co-counsel re proposed schedule	0.10	\$840.00	\$84.00
07/12/24	Jim Francis	zoom with cc re call recordings/notice	1.10	\$840.00	\$924.00
07/12/24	Jim Francis	Reviewed emails from co-counsel re notice dispute/class list production meeting	0.60	\$840.00	\$504.00
07/12/24	Jim Francis	Email from def counsel re production of class list	0.10	\$840.00	\$84.00
07/12/24	Jim Francis	Email from JM re class member totals (internal)	0.10	\$840.00	\$84.00
07/12/24	Jim Francis	Email from JM to def counsel re producion of class list	0.10	\$840.00	\$84.00
07/12/24	Jim Francis	Emails with all counsel re class list production and notice dispute	0.10	\$840.00	\$84.00
07/12/24	Jim Francis	Reviewed ECF 307	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Email from co-counsel re timeline of production of class list	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Email from co-counsel to all re production of class list	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
07/13/24	Jim Francis	Email from co-counsel to def co producing class list	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Email from def co re class list details and production	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Email from def co re production of class list	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Email from def co re receipt of class list	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Email from JM to def counsel re production of class list	0.10	\$840.00	\$84.00
07/13/24	Jim Francis	Emails with all counsel re production of class list	0.10	\$840.00	\$84.00
07/15/24	Jim Francis	Emails with all counsel re extension of page limit request	0.40	\$840.00	\$336.00
07/15/24	Jim Francis	Emails w all counsel re updated class list	0.30	\$840.00	\$252.00
07/15/24	Jim Francis	Email from co-counsel consenting to extension of page limit on brief	0.10	\$840.00	\$84.00
07/15/24	Jim Francis	Reviewed email from MW re production	0.10	\$840.00	\$84.00
07/15/24	Jim Francis	Reviewed ECF 308	0.10	\$840.00	\$84.00
07/15/24	Jim Francis	Reviewed email from Defense Counsel re production of addnl recordings	0.10	\$840.00	\$84.00
07/16/24	Jim Francis	review emails from Sam K and deposition dates in prep for team meeting	1.20	\$840.00	\$1,008.00
07/16/24	Jim Francis	team meeting re call recordings and dep dates	0.50	\$840.00	\$420.00
07/16/24	Jim Francis	Reviewed email from MW re production	0.20	\$840.00	\$168.00
07/16/24	Jim Francis	Email from def serving doc production letter	0.20	\$840.00	\$168.00
07/16/24	Jim Francis	Emails with all counsel re updated class list	0.10	\$840.00	\$84.00
07/16/24	Jim Francis	Reviewed email from co-counsel re call production	0.10	\$840.00	\$84.00
07/16/24	Jim Francis	Reviewed email from co-counsel re updated class list	0.10	\$840.00	\$84.00
07/17/24	Jim Francis	Reviewed email from co-counsel re scheduling remaining depositions	0.10	\$840.00	\$84.00
07/17/24	Jim Francis	Email confirming dep dates w. all counsel	0.10	\$840.00	\$84.00
07/17/24	Jim Francis	Reviewed ECF 309	0.10	\$840.00	\$84.00
07/18/24	Jim Francis	Email confirming dep dates w. all counsel	0.40	\$840.00	\$336.00
07/18/24	Jim Francis	Email to MW re cancellation of dep	0.10	\$840.00	\$84.00
07/18/24	Jim Francis	Email to all counsel re cancellation of dep/scheduling addnl dates	0.10	\$840.00	\$84.00
07/18/24	Jim Francis	Email from MW re cancellation of dep	0.10	\$840.00	\$84.00
07/18/24	Jim Francis	Email from MW circulating credentials for Janzig dep	0.10	\$840.00	\$84.00
07/18/24	Jim Francis	Reviewed email from co-counsel re division of labor/priority assignments	0.10	\$840.00	\$84.00
07/22/24	Jim Francis	Reviewed emails from co-counsel re decert and expert discovery division of labor	0.40	\$840.00	\$336.00
07/22/24	Jim Francis	Reviewed ECF 313	0.30	\$840.00	\$252.00
07/22/24	Jim Francis	Reviewed ECF 314	0.30	\$840.00	\$252.00
07/22/24	Jim Francis	Reviewed ECF 315	0.30	\$840.00	\$252.00
07/22/24	Jim Francis	Reviewed ECF 310	0.10	\$840.00	\$84.00
07/22/24	Jim Francis	Reviewed ECF 311	0.10	\$840.00	\$84.00
07/22/24	Jim Francis	Reviewed ECF 312	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
07/23/24	Jim Francis	prepare for zoom with team re decert motion, deps, class def	1.20	\$840.00	\$1,008.00
07/23/24	Jim Francis	zoom with team re decert motion, strategy/next steps	1.10	\$840.00	\$924.00
07/23/24	Jim Francis	Reviewed email from Defense Counsel re Decl. ISO Motion to Decertify Class	0.10	\$840.00	\$84.00
07/23/24	Jim Francis	Reviewed email from MW re Motion to Decert	0.10	\$840.00	\$84.00
07/23/24	Jim Francis	Email to MW to serve notices on all counsel	0.10	\$840.00	\$84.00
07/24/24	Jim Francis	Reviewed email from co-counsel re meeting re decert brief	1.00	\$840.00	\$840.00
07/24/24	Jim Francis	Emails with all counsel re updated class list	0.30	\$840.00	\$252.00
07/25/24	Jim Francis	Email to co-counsel re d s supplemental disclosures next steps	0.10	\$840.00	\$84.00
07/25/24	Jim Francis	Reviewed email from co-counsel re d s proposed motion to amend class notice deadline	0.10	\$840.00	\$84.00
07/25/24	Jim Francis	Reviewed email from co-counsel re extension of deadlines/amendment of class definitions	0.10	\$840.00	\$84.00
07/25/24	Jim Francis	Reviewed email from co-counsel re extension of deadlines/amendment of class definitions	0.10	\$840.00	\$84.00
07/26/24	Jim Francis	review Delta Dental decision; t/c with JM	1.30	\$840.00	\$1,092.00
07/26/24	Jim Francis	prepare for zoom with team re decert motion, deps, class def	1.20	\$840.00	\$1,008.00
07/26/24	Jim Francis	zoom with team re decert motion, deps, class def	1.20	\$840.00	\$1,008.00
07/26/24	Jim Francis	Reviewed email from co-counsel re extension of deadline to send notice	0.50	\$840.00	\$420.00
07/26/24	Jim Francis	Emails with all counsel re withdrawal of notice/extension motion re deadline to send notice	0.40	\$840.00	\$336.00
07/26/24	Jim Francis	Reviewed email from MW re Motion to Decert	0.10	\$840.00	\$84.00
07/27/24	Jim Francis	Reviewed email from co-counsel re edits on Joint Mtn to Extend	0.10	\$840.00	\$84.00
07/27/24	Jim Francis	Reviewed email from co-counsel re withdrawal of notice	0.10	\$840.00	\$84.00
07/27/24	Jim Francis	Emails with all counsel re withdrawal of notice	0.10	\$840.00	\$84.00
07/27/24	Jim Francis	Emails with all counsel re withdrawal of notice/extension motion re deadline to send notice	0.10	\$840.00	\$84.00
07/27/24	Jim Francis	Emails with all counsel re withdrawal of notice/extension motion re deadline to send notice	0.10	\$840.00	\$84.00
07/29/24	Jim Francis	zoom with cc re decert motion/depositions; draft assignment list for firm	1.30	\$840.00	\$1,092.00
07/29/24	Jim Francis	Emails with all counsel re withdrawal of notice	0.30	\$840.00	\$252.00
07/29/24	Jim Francis	Emails with all counsel re withdrawal of notice/extension motion re deadline to send notice	0.10	\$840.00	\$84.00
07/29/24	Jim Francis	Reviewed ECF 316	0.10	\$840.00	\$84.00
07/29/24	Jim Francis	Reviewed ECF 317	0.10	\$840.00	\$84.00
07/30/24	Jim Francis	Email from Jennifer Murray to co-counsel circulating draft NODs and RFPs	0.10	\$840.00	\$84.00
07/30/24	Jim Francis	Email from Jennifer Murray circulating updated doc production	0.10	\$840.00	\$84.00
07/30/24	Jim Francis	Email from Jennifer Murray circulating draft ltr re discovery issues and proposed extension to decert resp	0.10	\$840.00	\$84.00
07/30/24	Jim Francis	Email from co-counsel serving meet and confer ltr to def counsel	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Reviewed email from co-counsel re extension to take deps	0.20	\$840.00	\$168.00
07/31/24	Jim Francis	Reviewed email from co-counsel re deposition strategy	0.20	\$840.00	\$168.00
07/31/24	Jim Francis	Reviewed email from co-counsel re meet and confer	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
07/31/24	Jim Francis	Email to co-counsel re extension to take deps	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Reviewed email from co-counsel re strategy call topics	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Reviewed email from co-counsel re strategy call logistics	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Emails with all counsel re meet and confer logistics	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Email re meet and confer logistics from def counsel	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Email from Jennifer Murray to CDL advising of extension to send notice	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Email from co-counsel serving disco requests	0.10	\$840.00	\$84.00
07/31/24	Jim Francis	Reviewed ECF 318	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Reviewed email from co-counsel re draft stipulated motion	0.40	\$840.00	\$336.00
08/01/24	Jim Francis	Reviewed email from SA and co-counsel re notice mailing procedure	0.20	\$840.00	\$168.00
08/01/24	Jim Francis	Reviewed email from co-counsel re potential discovery disputes	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Reviewed email from co-counsel re response to Kaplan letter	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email w co-counsel re Puchi deposition	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email to MW re logistics of Puchi dep	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email to MW re scheduling depositions	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email to MW re p s discovery requests	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Reviewed email from all counsel re joint motion to extend	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email from TM to def co re producing attachment to RFP No 46	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email from SA re notice plan	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email from def counsel re meet and confer and discovery disputes	0.10	\$840.00	\$84.00
08/01/24	Jim Francis	Email from co-counsel re dep logistics	0.10	\$840.00	\$84.00
08/02/24	Jim Francis	Reviewed email from SA and co-counsel re notice preparation	0.20	\$840.00	\$168.00
08/02/24	Jim Francis	Reviewed email from co-counsel re retaining expert	0.10	\$840.00	\$84.00
08/02/24	Jim Francis	Email to co-counsel re draft stipulated motion	0.10	\$840.00	\$84.00
08/05/24	Jim Francis	Reviewed email from all counsel re joint motion to extend	0.30	\$840.00	\$252.00
08/05/24	Jim Francis	Reviewed email from co-counsel re administration invoice	0.10	\$840.00	\$84.00
08/05/24	Jim Francis	Reviewed email from co-counsel re draft stipulated motion	0.10	\$840.00	\$84.00
08/05/24	Jim Francis	Reviewed ECF 319	0.10	\$840.00	\$84.00
08/06/24	Jim Francis	Email from def co to Jodi Nuss re blank call recordings	0.10	\$840.00	\$84.00
08/06/24	Jim Francis	Email from Jodi Nuss to def counsel serving data production	0.10	\$840.00	\$84.00
08/07/24	Jim Francis	Reviewed email from co counsel re f/u to meet and confer	0.60	\$840.00	\$504.00
08/07/24	Jim Francis	Reviewed email from co-counsel re f/u to Kaplan call	0.10	\$840.00	\$84.00
08/07/24	Jim Francis	Email follow up re discovery issues/meet and confer	0.10	\$840.00	\$84.00
08/07/24	Jim Francis	Email from def counsel serving responses to doc requests	0.10	\$840.00	\$84.00
08/09/24	Jim Francis	Email re payment of expert invoice w. co-counsel	0.20	\$840.00	\$168.00

Date	Timekeeper	Narrative	Units	Rate	Value
08/09/24	Jim Francis	Reviewed email from co-counsel re expert bills	0.10	\$840.00	\$84.00
08/09/24	Jim Francis	Reviewed email from co-counsel re Verkhovskaya deposition preparation	0.10	\$840.00	\$84.00
08/09/24	Jim Francis	Reviewed ECF 320	0.10	\$840.00	\$84.00
08/09/24	Jim Francis	Reviewed ECF 321	0.10	\$840.00	\$84.00
08/10/24	Jim Francis	Email from Jodi Nuss to def counsel serving expert declarations	0.10	\$840.00	\$84.00
08/11/24	Jim Francis	Email to Jennifer Murray re estimate for addnl expert services	0.10	\$840.00	\$84.00
08/12/24	Jim Francis	Reviewed email from co-counsel re discovery and decert opp	0.10	\$840.00	\$84.00
08/12/24	Jim Francis	Reviewed email from co-counsel re estimate for further expert services	0.10	\$840.00	\$84.00
08/12/24	Jim Francis	Reviewed email from co-counsel re discovery strategy	0.10	\$840.00	\$84.00
08/12/24	Jim Francis	Reviewed email from SA and co-counsel re reverse look-up methodology	0.10	\$840.00	\$84.00
08/12/24	Jim Francis	Email from def counsel re discovery issues	0.10	\$840.00	\$84.00
08/12/24	Jim Francis	Reviewed ECF 322	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Emails from def counsel serving doc production	0.30	\$840.00	\$252.00
08/13/24	Jim Francis	Reviewed email from co-counsel re 3rd Set of RFPs/Dep Notices	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Reviewed email from co-counsel re potential discovery disputes	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Email to MW re transcript of phone calls	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Reviewed email from co-counsel re discovery strategy	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Email to co counsel requesting to continue with depositions as scheduled	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Email from def counsel serving production	0.10	\$840.00	\$84.00
08/13/24	Jim Francis	Email from Jodi Nuss circulating transcripts and recordings	0.10	\$840.00	\$84.00
08/14/24	Jim Francis	Email from co-counsel re division of labor re written discovery	0.30	\$840.00	\$252.00
08/14/24	Jim Francis	Emails w. co-counsel to def counsel re written disco	0.20	\$840.00	\$168.00
08/14/24	Jim Francis	Reviewed email from co-counsel re motion to seal opposition	0.10	\$840.00	\$84.00
08/14/24	Jim Francis	Reviewed email sfrom expert and co-counsel	0.10	\$840.00	\$84.00
08/14/24	Jim Francis	Email w co-counsel re edits on resp to raised discovery issues	0.10	\$840.00	\$84.00
08/14/24	Jim Francis	Email from def counsel serving disco requests	0.10	\$840.00	\$84.00
08/14/24	Jim Francis	Email from co-counsel serving disco requests	0.10	\$840.00	\$84.00
08/15/24	Jim Francis	Reviewed email from co-counsel re decert motion opp	0.10	\$840.00	\$84.00
08/15/24	Jim Francis	Emails with all counsel re p s discovery requests	0.10	\$840.00	\$84.00
08/15/24	Jim Francis	Emails with all counsel re discovery issues	0.10	\$840.00	\$84.00
08/15/24	Jim Francis	Email from def counsel to co-counsel re written disco requests	0.10	\$840.00	\$84.00
08/16/24	Jim Francis	Email from def co re deposition/witness issues	0.10	\$840.00	\$84.00
08/19/24	Jim Francis	Reviewed email from opposing counsel and co-counsel re dep logistics	0.40	\$840.00	\$336.00
08/21/24	Jim Francis	zoom with cc re deps and decert motion	0.70	\$840.00	\$588.00
08/21/24	Jim Francis	Email from Amanda Steiner w. draft opp to Motion to Decert	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
08/22/24	Jim Francis	Reviewed emails from co-counsel re payment of costs to S.A.	0.20	\$840.00	\$168.00
08/22/24	Jim Francis	Reviewed email from co-counsel re CDL Costs	0.10	\$840.00	\$84.00
08/22/24	Jim Francis	Email to Mark Mailman and Crystal Rosado re costs in case	0.10	\$840.00	\$84.00
08/22/24	Jim Francis	Email from MW re dep prep for Goddard Dep	0.10	\$840.00	\$84.00
08/23/24	Jim Francis	Emails with all counsel re meet and confer	0.40	\$840.00	\$336.00
08/23/24	Jim Francis	Reviewed email from co-counsel re 3rd Set of RFPs/Dep Notices	0.20	\$840.00	\$168.00
08/24/24	Jim Francis	Email re Motion to Decertify Response	0.20	\$840.00	\$168.00
08/24/24	Jim Francis	Reviewed email from co-counsel re client s response to decert motion	0.10	\$840.00	\$84.00
08/24/24	Jim Francis	Reviewed email from Mark Mailman re client s response to decert motion	0.10	\$840.00	\$84.00
08/26/24	Jim Francis	prepare for deposition of call agent Shimek Goddard--review call all of her call recordings	8.50	\$840.00	\$7,140.00
08/26/24	Jim Francis	zoom with OC re Shimek Goddard dep, call recording dispute; r/r emails confirming withdrawal of witness	1.20	\$840.00	\$1,008.00
08/26/24	Jim Francis	r/r emails with co-counsel, OC re deposition logistics; 30b1/30b6	0.80	\$840.00	\$672.00
08/26/24	Jim Francis	Email from def co re amendment of disclosures	0.10	\$840.00	\$84.00
08/27/24	Jim Francis	prepare for deposition of Dawn Janzig--review all call recordings; r/r emails with cc re outlines	9.00	\$840.00	\$7,560.00
08/27/24	Jim Francis	Emails w. co-counsel and MW re dep logistics	0.60	\$840.00	\$504.00
08/27/24	Jim Francis	Reviewed email from co-counsel re Janzig, Puchi, and Bowdish depositions	0.10	\$840.00	\$84.00
08/27/24	Jim Francis	Email from def co requesting amendment to RFPs	0.10	\$840.00	\$84.00
08/28/24	Jim Francis	prepare for 30b1 and 30b6 deposition, Stacey Bowdish on Friday	11.00	\$840.00	\$9,240.00
08/28/24	Jim Francis	Email btw MW and def counsel re deposition logistics	0.50	\$840.00	\$420.00
08/28/24	Jim Francis	Emails w MW re scheduling deps	0.20	\$840.00	\$168.00
08/28/24	Jim Francis	Email to def counsel re disco issues related to call recordings	0.10	\$840.00	\$84.00
08/28/24	Jim Francis	Email from Blythe Chandler to def counsel serving third set of RFPs	0.10	\$840.00	\$84.00
08/28/24	Jim Francis	Reviewed email from def counsel and MW re scheduling deps	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	take deposition of Dawn Janzig	7.50	\$840.00	\$6,300.00
08/29/24	Jim Francis	debrief cc on Janzig dep, next steps/followup	1.20	\$840.00	\$1,008.00
08/29/24	Jim Francis	Email to MW re dep prep	0.30	\$840.00	\$252.00
08/29/24	Jim Francis	Reviewed email from co-counsel re deposition	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	Reviewed email from JMS and co-counsel re call recording transcripts	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	Reviewed email from court reporter re Janzig rough transcript	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	Reviewed email from MW re dep logistics	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	Def circulating exhibits marked in deposition	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	Email from def counsel serving objections to dep notices	0.10	\$840.00	\$84.00
08/29/24	Jim Francis	Email from MW to court reporter and counsel circulating dep exhibits	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
08/30/24	Jim Francis	prepare for deposition of S Bowdish	4.00	\$840.00	\$3,360.00
08/30/24	Jim Francis	take deposition of Rule 30b1 and 30b6 witness Bowdish	3.20	\$840.00	\$2,688.00
08/30/24	Jim Francis	debrief cc re dep/follow up/next steps Bowdish dep	1.20	\$840.00	\$1,008.00
08/30/24	Jim Francis	Email from Samantha Holbrook re edits to decert opp	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from MM and CR re payment of costs to S.A.	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from court reporter re Bowdish deposition transcript	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from Crystal Rosado re Costs in case	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from MW re dep notices	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from co-counsel re deposition prep	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from MW re obtaining transcript for Bowdish dep	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Email to Jennifer Murray sending Bowdish dep transcript	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from co-counsel re rough transcript of Bowdish dep	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Email from JMS providing dep link to co-counsel	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Email from co-counsel requesting dep link	0.10	\$840.00	\$84.00
08/30/24	Jim Francis	Reviewed email from co-counsel re stip to re-note motion to seal	0.10	\$840.00	\$84.00
08/31/24	Jim Francis	Email from defense counsel serving objections and responses to 3rd set of disco requests	0.10	\$840.00	\$84.00
09/03/24	Jim Francis	prepare for deposition of Esmeralda Puchi--review all call recordings, review outlines and exhibits from case	8.50	\$840.00	\$7,140.00
09/03/24	Jim Francis	Emails re dep logistics	0.30	\$840.00	\$252.00
09/03/24	Jim Francis	Emails from def counsel transmitting responses and production letter	0.30	\$840.00	\$252.00
09/03/24	Jim Francis	Emails w. MW re dep prep	0.30	\$840.00	\$252.00
09/03/24	Jim Francis	Reviewed email from court reporter re Bowdish transcript	0.10	\$840.00	\$84.00
09/03/24	Jim Francis	Reviewed email from def counsel re call recording length	0.10	\$840.00	\$84.00
09/03/24	Jim Francis	Email from JMS w. his summary for Puchi dep	0.10	\$840.00	\$84.00
09/03/24	Jim Francis	Email to JMS re dep prep	0.10	\$840.00	\$84.00
09/03/24	Jim Francis	Email form Jennifer Murray to def counsel requesting extension to file decert opp brief	0.10	\$840.00	\$84.00
09/04/24	Jim Francis	take deposition of E Pucchi	4.50	\$840.00	\$3,780.00
09/04/24	Jim Francis	prep for deposition of pucchi	3.00	\$840.00	\$2,520.00
09/04/24	Jim Francis	debrief pucchi dep and next steps re decert response/transcript/video	1.50	\$840.00	\$1,260.00
09/04/24	Jim Francis	Emails re dep transcripts	0.50	\$840.00	\$420.00
09/04/24	Jim Francis	Reviewed emails from co-counsel re emergency exemption issue	0.30	\$840.00	\$252.00
09/04/24	Jim Francis	Email from def counsel re Russo dep	0.20	\$840.00	\$168.00
09/04/24	Jim Francis	Reviewed emails from MW re doc production	0.20	\$840.00	\$168.00
09/04/24	Jim Francis	Email from def counsel serving expert witness disclosure/report	0.10	\$840.00	\$84.00
09/04/24	Jim Francis	Email to co-counsel re "emergency call" argument	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
09/04/24	Jim Francis	Reviewed email from co-counsel re analysis of expert report	0.10	\$840.00	\$84.00
09/05/24	Jim Francis	Emails with all counsel re edits on Joint Mtn to Extend Deadlines	0.80	\$840.00	\$672.00
09/05/24	Jim Francis	Email from MW to court reporter requesting status of rush transcript	0.10	\$840.00	\$84.00
09/05/24	Jim Francis	Reviewed email from court reporter re Pucci deposition	0.10	\$840.00	\$84.00
09/06/24	Jim Francis	Email btw co-counsel and def counsel re decert opposition filing	0.50	\$840.00	\$420.00
09/06/24	Jim Francis	Emails btw co-counsel and def counsel re decert opposition filing	0.20	\$840.00	\$168.00
09/06/24	Jim Francis	Email from def counsel re Russo dep	0.10	\$840.00	\$84.00
09/06/24	Jim Francis	Reviewed ECF 323	0.10	\$840.00	\$84.00
09/06/24	Jim Francis	Reviewed ECF 324	0.10	\$840.00	\$84.00
09/06/24	Jim Francis	Reviewed ECF 325	0.10	\$840.00	\$84.00
09/06/24	Jim Francis	Reviewed email from court reporter re Bowdish deposition pip sync	0.10	\$840.00	\$84.00
09/06/24	Jim Francis	Reviewed email from court reporter re Janzig deposition	0.10	\$840.00	\$84.00
09/07/24	Jim Francis	Reviewed email from co-counsel re expert dep scheduling	0.10	\$840.00	\$84.00
09/07/24	Jim Francis	Reviewed email from co-counsel re expert discovery/scheduling issues	0.10	\$840.00	\$84.00
09/09/24	Jim Francis	Reviewed email from court reporter re Janzig pip sync	0.10	\$840.00	\$84.00
09/10/24	Jim Francis	Reviewed ECF 326	0.10	\$840.00	\$84.00
09/13/24	Jim Francis	Reviewed ECF 327	0.10	\$840.00	\$84.00
09/13/24	Jim Francis	Reviewed ECF 328	0.10	\$840.00	\$84.00
09/13/24	Jim Francis	Reviewed ECF 329	0.10	\$840.00	\$84.00
09/13/24	Jim Francis	Reviewed ECF 330	0.10	\$840.00	\$84.00
09/13/24	Jim Francis	Reviewed ECF 331	0.10	\$840.00	\$84.00
09/13/24	Jim Francis	Reviewed ECF 332	0.10	\$840.00	\$84.00
09/16/24	Jim Francis	Reviewed ECF 333	0.10	\$840.00	\$84.00
09/20/24	Jim Francis	Reviewed ECF 334	0.10	\$840.00	\$84.00
09/23/24	Jim Francis	Reviewed ECF 335	0.10	\$840.00	\$84.00
09/24/24	Jim Francis	Reviewed ECF 336	0.10	\$840.00	\$84.00
10/16/24	Jim Francis	Prep for Russo dep	5.20	\$840.00	\$4,368.00
10/17/24	Jim Francis	Take Russo (Def expert) dep	2.40	\$840.00	\$2,016.00
11/01/24	Jim Francis	review edit and revise settlement term sheet, stipulated motion to decertify, t/c with JM, emails from counsel	4.70	\$840.00	\$3,948.00
11/01/24	Jim Francis	Emails with all counsel re stipulated mtn and term sheet	1.00	\$840.00	\$840.00
11/01/24	Jim Francis	Emails with all counsel re draft term sheet	0.40	\$840.00	\$336.00
11/01/24	Jim Francis	Reviewed ECF 337	0.10	\$840.00	\$84.00
11/02/24	Jim Francis	Reviewed email from Terrell Marshall staff re confidential settlement term sheet	0.10	\$840.00	\$84.00
11/04/24	Jim Francis	Reviewed email from defense counsel and co-counsel re term sheet	0.40	\$840.00	\$336.00

Date	Timekeeper	Narrative	Units	Rate	Value
11/04/24	Jim Francis	Reviewed email from co-counsel re Verkhovskaya invoice	0.20	\$840.00	\$168.00
11/04/24	Jim Francis	Reviewed email from defense counsel re signing term sheet	0.10	\$840.00	\$84.00
11/04/24	Jim Francis	Emails with all counsel and courtroom deputy re withdrawal of motion	0.10	\$840.00	\$84.00
11/04/24	Jim Francis	Email from Frank Barkan re settlement administration proposal	0.10	\$840.00	\$84.00
11/05/24	Jim Francis	Email from Jennifer Murray re setting up call re administrators and expert fees	0.10	\$840.00	\$84.00
11/06/24	Jim Francis	Reviewed ECF 338	0.10	\$840.00	\$84.00
11/07/24	Jim Francis	Reviewed emails from SA and co-counsel re proposal for administration	0.30	\$840.00	\$252.00
11/07/24	Jim Francis	Email from Jennifer Murray re draft prel appr. motion	0.10	\$840.00	\$84.00
11/08/24	Jim Francis	Reviewed email from defense counsel and co-counsel re settlement terms	0.20	\$840.00	\$168.00
11/08/24	Jim Francis	Reviewed email from co-counsel re drafted settlement docs	0.10	\$840.00	\$84.00
11/08/24	Jim Francis	Reviewed email from defense counsel and co-counsel re term sheet edits	0.10	\$840.00	\$84.00
11/13/24	Jim Francis	Reviewed email from co-counsel re proposed edits to term sheet	0.20	\$840.00	\$168.00
11/13/24	Jim Francis	Reviewed email from co-counsel re settlement class definition	0.10	\$840.00	\$84.00
11/13/24	Jim Francis	Email to co-counsel re proposed edits to term sheet	0.10	\$840.00	\$84.00
11/13/24	Jim Francis	Reviewed email from defense counsel and co-counsel re term sheet edits	0.10	\$840.00	\$84.00
11/13/24	Jim Francis	Reviewed email from co-counsel re edits to settlement term sheet	0.10	\$840.00	\$84.00
11/14/24	Jim Francis	Reviewed email from co-counsel and expert re confirmation of payment	0.30	\$840.00	\$252.00
11/14/24	Jim Francis	Email w co-counsel re CEG bills	0.10	\$840.00	\$84.00
11/14/24	Jim Francis	Email w Crystal Rosado re CEG costs	0.10	\$840.00	\$84.00
11/15/24	Jim Francis	Email from Samantha Holbrook circulated bid from RG2	0.10	\$840.00	\$84.00
11/17/24	Jim Francis	Reviewed email from co-counsel re expert dep billing	0.10	\$840.00	\$84.00
11/17/24	Jim Francis	Email from Jennifer Murray circulating p s expert dep transcript	0.10	\$840.00	\$84.00
11/18/24	Jim Francis	Reviewed ECF 339	0.10	\$840.00	\$84.00
11/20/24	Jim Francis	Reviewed email from SA and co-counsel re proposal for administration	0.30	\$840.00	\$252.00
11/20/24	Jim Francis	Reviewed emails from SA and co-counsel re notification invoice	0.20	\$840.00	\$168.00
11/20/24	Jim Francis	Email from Jennifer Murray to Frank Barkan re CAFA notice estimate	0.10	\$840.00	\$84.00
11/20/24	Jim Francis	Email from SA re CAFA notice costs	0.10	\$840.00	\$84.00
11/20/24	Jim Francis	Email from CDL re proposal for administration services	0.10	\$840.00	\$84.00
11/20/24	Jim Francis	Email from Jennifer Murray w. thoughts on current settlement agreement draft	0.10	\$840.00	\$84.00
11/21/24	Jim Francis	Email from Blythe Chandler re settlement agreement provisions	0.10	\$840.00	\$84.00
11/21/24	Jim Francis	Email from Jennifer Murray re edits on settlement agreement	0.10	\$840.00	\$84.00
11/22/24	Jim Francis	Email w Crystal Rosado re CEG costs	0.10	\$840.00	\$84.00
11/22/24	Jim Francis	Reviewed email from MM and CR re payment of costs to S.A.	0.10	\$840.00	\$84.00
11/25/24	Jim Francis	Email from Jennifer Murray circulating draft notices	0.10	\$840.00	\$84.00
11/25/24	Jim Francis	Email from Jennifer Murray circulating draft settlement docs	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
11/25/24	Jim Francis	Reviewed email from MM and CR re payment of costs to S.A.	0.10	\$840.00	\$84.00
11/26/24	Jim Francis	Reviewed email from co-counsel re Administration Bid proposed by D	0.10	\$840.00	\$84.00
11/26/24	Jim Francis	Email from Samantha Holbrook w. edits to draft notices	0.10	\$840.00	\$84.00
11/26/24	Jim Francis	Email from Jennifer Murray to all counsel circulating settlement agreement and proposed draft exhibits	0.10	\$840.00	\$84.00
12/03/24	Jim Francis	Reviewed emails from SA and co-counsel re sample ad notices	0.70	\$840.00	\$588.00
12/03/24	Jim Francis	Email from Jennifer Murray memorializing call w. def counsel re settlement issues	0.10	\$840.00	\$84.00
12/03/24	Jim Francis	EMail from Jennifer Murray transmitting updated settlement agreement draft	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	prepare for Zoom with OC; review administration bids, emails re settlement documentation,	1.20	\$840.00	\$1,008.00
12/04/24	Jim Francis	zoom with OC re selection of administrators and final details re settlement agreement	0.80	\$840.00	\$672.00
12/04/24	Jim Francis	Reviewed email from Defense Counsel re Settlement Agreement	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	Email from Jennifer Murray memorializing call w. def counsel re settlement	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	Email from Jennifer Murray providing edits/comments to notice exhibits	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	Email from Amanda Steiner approving edits/comments to notice exhibits	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	Emails with all counsel re check-in call re settlement agreement drafting	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	Email from Jennifer Murray re CDL customized notice	0.10	\$840.00	\$84.00
12/04/24	Jim Francis	Email from Jennifer Murray to def counsel re CDL	0.10	\$840.00	\$84.00
12/05/24	Jim Francis	Email to Jennifer Murray re Settlement Agreement language	0.40	\$840.00	\$336.00
12/05/24	Jim Francis	Email from Jennifer Murray re starting subpoena proess	0.10	\$840.00	\$84.00
12/06/24	Jim Francis	Emails with all counsel re preliminary appr. status report	0.70	\$840.00	\$588.00
12/06/24	Jim Francis	Reviewed ECF 340	0.30	\$840.00	\$252.00
12/06/24	Jim Francis	Emails w Jennifer Murray re Simpluris bid	0.20	\$840.00	\$168.00
12/06/24	Jim Francis	Reviewed email from co-counsel re administrator bid	0.10	\$840.00	\$84.00
12/06/24	Jim Francis	Email from Jennifer Murray sending notie forms for def counsel review	0.10	\$840.00	\$84.00
12/06/24	Jim Francis	Email from Jennifer Murray to all counsel w. draft status report	0.10	\$840.00	\$84.00
12/06/24	Jim Francis	Email from def approving draft status repor	0.10	\$840.00	\$84.00
12/09/24	Jim Francis	Emails with all counsel re administrator bids	0.20	\$840.00	\$168.00
12/09/24	Jim Francis	Reviewed email from co-counsel re settlement negotiations	0.10	\$840.00	\$84.00
12/09/24	Jim Francis	Email to co-counsel re administrator bids	0.10	\$840.00	\$84.00
12/09/24	Jim Francis	Emails with all counsel re preliminary appr. status report and SA bids	0.10	\$840.00	\$84.00
12/09/24	Jim Francis	Email from defense re simpluris bid	0.10	\$840.00	\$84.00
12/09/24	Jim Francis	Email from def counsel re confidentiality related to dislcosures	0.10	\$840.00	\$84.00
12/10/24	Jim Francis	Reviewed email from co-counsel and defense re subpoena compliance	0.10	\$840.00	\$84.00
12/10/24	Jim Francis	Email from def counsel re confidentiality/data carriers	0.10	\$840.00	\$84.00
12/10/24	Jim Francis	Email from Jennifer Murray circulating mtn for preliminary approval draft	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/12/24	Jim Francis	Reviewed email from administrator and all counsel re proposed social media notice/ads	0.10	\$840.00	\$84.00
12/13/24	Jim Francis	Reviewed ECF 341	0.30	\$840.00	\$252.00
12/13/24	Jim Francis	Reviewed ECF 342	0.30	\$840.00	\$252.00
12/13/24	Jim Francis	Reviewed ECF 343	0.10	\$840.00	\$84.00
12/13/24	Jim Francis	Reviewed email from administrator and all counsel re proposed notice updates	0.10	\$840.00	\$84.00
12/16/24	Jim Francis	Reviewed Docket Notification from Court	0.30	\$840.00	\$252.00
12/17/24	Jim Francis	Reviewed ECF 344	0.10	\$840.00	\$84.00
12/17/24	Jim Francis	Reviewed email from co-counsel and defense counsel rereview of settlement agreemnt	0.10	\$840.00	\$84.00
12/17/24	Jim Francis	Reviewed email from administrator and all counsel re proposed notices	0.10	\$840.00	\$84.00
12/17/24	Jim Francis	Reviewed email from administrator and all counsel re proposed notice updates	0.10	\$840.00	\$84.00
12/17/24	Jim Francis	Reviewed email from SA and co-counsel re notification invoice	0.10	\$840.00	\$84.00
12/18/24	Jim Francis	Reviewed emails from SA and co-counsel re notification invoice	0.20	\$840.00	\$168.00
12/18/24	Jim Francis	Reviewed email from co-counsel re expert deposition invoice	0.10	\$840.00	\$84.00
12/18/24	Jim Francis	Reviewed email from SA re costs	0.10	\$840.00	\$84.00
12/18/24	Jim Francis	Email from Shub re Verkhovskaya dep invoice payment	0.10	\$840.00	\$84.00
12/18/24	Jim Francis	Email from Samantha Holbrook w. edits to draft prel approval motion	0.10	\$840.00	\$84.00
12/19/24	Jim Francis	Reviewed email from co-counsel and defense counsel re motion for preliminary approval	0.10	\$840.00	\$84.00
12/20/24	Jim Francis	Reviewed emails from co-counsel re execution of settlement agreement	0.40	\$840.00	\$336.00
12/20/24	Jim Francis	Reviewed ECF 345	0.30	\$840.00	\$252.00
12/20/24	Jim Francis	Reviewed ECF 346	0.30	\$840.00	\$252.00
12/20/24	Jim Francis	Reviewed emails from co-counsel and defense counsel re final draft of settlement agreement	0.20	\$840.00	\$168.00
12/20/24	Jim Francis	Reviewed email from co-counsel re settlement class definition	0.10	\$840.00	\$84.00
12/20/24	Jim Francis	Reviewed email from defense counsel and co-counsel re preliminary approval	0.10	\$840.00	\$84.00
12/20/24	Jim Francis	Email from Jennifer Murray re prep of decl iso preliminary approval	0.10	\$840.00	\$84.00
12/21/24	Jim Francis	Reviewed email from administrator and all counsel re signed SA	0.10	\$840.00	\$84.00
12/23/24	Jim Francis	Email from SA to all counsel re template CAFA cover letter	0.10	\$840.00	\$84.00
12/23/24	Jim Francis	Email from def co to all counsel and SA requesting template for CAFA cover letter	0.10	\$840.00	\$84.00
12/23/24	Jim Francis	Email from def co providing materials to SA	0.10	\$840.00	\$84.00
12/23/24	Jim Francis	Email from SA re CAA notice preparation/logistics	0.10	\$840.00	\$84.00
01/15/25	Jim Francis	Reviewed ECF 347	0.30	\$840.00	\$252.00
01/15/25	Jim Francis	Reviewed email from settlement administrator/co-counsel re Order Granting Prelim Approval	0.20	\$840.00	\$168.00
01/15/25	Jim Francis	Reviewed email from co-counsel re Order granting Preliminary Approval Motion	0.10	\$840.00	\$84.00
01/15/25	Jim Francis	Reviewed email from co-counsel re class notice procedure	0.10	\$840.00	\$84.00
01/15/25	Jim Francis	Reviewed email from MT re fee petition planning	0.10	\$840.00	\$84.00

Date	Timekeeper	Narrative	Units	Rate	Value
01/15/25	Jim Francis	Reviewed email from settlement administrator/co-counsel re Order Granting Prelim Approval	0.10	\$840.00	\$84.00
01/15/25	Jim Francis	Email from clerk to Judge Pechman requesting Word version of PO of Mtn for Preliminary Approval	0.10	\$840.00	\$84.00
01/16/25	Jim Francis	Email from SA w. drafted notice documents	0.10	\$840.00	\$84.00
01/17/25	Jim Francis	Email from Jennifer Murray re settlement doc review	0.20	\$840.00	\$168.00
01/17/25	Jim Francis	Email to MT re completion of fee petition records	0.10	\$840.00	\$84.00
01/17/25	Jim Francis	Reviewed email from Law360 re TCPA Suit article	0.10	\$840.00	\$84.00
01/17/25	Jim Francis	Email from SA re review of materials	0.10	\$840.00	\$84.00
01/21/25	Jim Francis	Reviewed email from SA and co-counsel re notice preparation	0.50	\$840.00	\$420.00
01/22/25	Jim Francis	Reviewed ECF 348	0.10	\$840.00	\$84.00
01/24/25	Jim Francis	Reviewed email from SA and co-counsel re notice preparation	0.30	\$840.00	\$252.00
01/24/25	Jim Francis	Email from SA re review of materials	0.10	\$840.00	\$84.00
01/27/25	Jim Francis	review file for state of time records and expenses ;t/c with JM re the same	1.40	\$840.00	\$1,176.00
01/28/25	Jim Francis	Email to MT w. fee petition assignmets	0.10	\$840.00	\$84.00
01/29/25	Jim Francis	Reviewed email from co-counsel re final notices	0.10	\$840.00	\$84.00
01/29/25	Jim Francis	Reviewed email from Crystal Rosado, Mark Mailman, and John Soumilas re dep invoices	0.10	\$840.00	\$84.00
01/31/25	Jim Francis	Email from MT w. fee petition materials	0.10	\$840.00	\$84.00
05/01/25	Jim Francis	Anticipated time to be spent in the future in connection with the final approval motion and hearing and for ongoing class administration and delivery of funds to class members	50.00	\$840.00	\$42,000.00
10/17/25	Jim Francis	draft follow-up memo re Russo dep/next steps	1.00	\$840.00	\$840.00
Jim Francis Total:			665.0		\$558,600.00

Name:	John Soumilas				
12/11/18	John Soumilas	Attend attorney meeting and review of case facts, claims, defense, venue, valuation and discuss litigation strategy considerations.	0.90	\$745.00	\$670.50
12/14/18	John Soumilas	Emails Regarding Executed Class Rep Letter	0.20	\$745.00	\$149.00
12/17/18	John Soumilas	Continue to review pre-suit investigation and draft of complaint; correspondence local counsel;	1.60	\$745.00	\$1,192.00
12/17/18	John Soumilas	Email regarding Complaint	0.10	\$745.00	\$74.50
12/18/18	John Soumilas	Correspondence re complaint development. meeting, notes	0.50	\$745.00	\$372.50
12/18/18	John Soumilas	Emails regarding Complaint	0.50	\$745.00	\$372.50
12/19/18	John Soumilas	Emails regarding Complaint	0.40	\$745.00	\$298.00
12/20/18	John Soumilas	Emails regarding Complaint	0.60	\$745.00	\$447.00
01/01/19	John Soumilas	Review of most recent version of complaint	0.50	\$745.00	\$372.50

Date	Timekeeper	Narrative	Units	Rate	Value
01/02/19	John Soumilas	Review most recent draft of class action complaint	0.50	\$745.00	\$372.50
01/03/19	John Soumilas	Email RegardingTCPA Draft Complaint	0.30	\$745.00	\$223.50
01/04/19	John Soumilas	Email RegardingTCPA Draft Complaint	1.30	\$745.00	\$968.50
01/06/19	John Soumilas	review correspondence from co-counsel re further further facts needed, call with client	0.30	\$745.00	\$223.50
01/06/19	John Soumilas	Email RegardingTCPA Draft Complaint	0.70	\$745.00	\$521.50
01/07/19	John Soumilas	Review memo from co-counsel re call with client, additional facts; review revised class action complaint.	0.90	\$745.00	\$670.50
01/07/19	John Soumilas	Email RegardingTCPA Draft Complaint	0.40	\$745.00	\$298.00
01/08/19	John Soumilas	Final edits to complaint; correspondence to Seattle counsel re filing.	0.70	\$745.00	\$521.50
01/08/19	John Soumilas	Email RegardingTCPA Draft Complaint	0.60	\$745.00	\$447.00
01/09/19	John Soumilas	Email RegardingTCPA Draft Complaint	0.60	\$745.00	\$447.00
01/30/19	John Soumilas	Research re judge assigned to case	0.60	\$745.00	\$447.00
01/30/19	John Soumilas	Email regarding judge assignment	0.10	\$745.00	\$74.50
01/31/19	John Soumilas	Review correspondence re call from D counsel	0.20	\$745.00	\$149.00
01/31/19	John Soumilas	Email regarding judge assignment	0.20	\$745.00	\$149.00
02/01/19	John Soumilas	Email regarding Vmail from UCH counsel in Samson case	0.20	\$745.00	\$149.00
02/05/19	John Soumilas	Review notice of removal paperwork, rule, remand options, and judge assigned to case in federal court.	0.60	\$745.00	\$447.00
02/05/19	John Soumilas	Email RegardingTCPA Draft Complaint	0.50	\$745.00	\$372.50
02/06/19	John Soumilas	Review correspondence re strategy call among Ps counsel	0.20	\$745.00	\$149.00
02/06/19	John Soumilas	Correspondence re pro hacs; review local rules	0.30	\$745.00	\$223.50
02/06/19	John Soumilas	Emails re initial case details	1.60	\$745.00	\$1,192.00
02/07/19	John Soumilas	pro hac papers	0.30	\$745.00	\$223.50
02/08/19	John Soumilas	Emails re PHV applications	0.30	\$745.00	\$223.50
02/13/19	John Soumilas	Email re PHV application	0.10	\$745.00	\$74.50
02/19/19	John Soumilas	Review detailed 12 par removal; notes for discovery	0.60	\$745.00	\$447.00
02/20/19	John Soumilas	Review court orders; review correspondence re Rule 26(f) meeting and discovery plan; internal email re discovery goals and deadlines.	0.40	\$745.00	\$298.00
02/20/19	John Soumilas	correspondence re D request for extension and screenshots	0.40	\$745.00	\$298.00
02/20/19	John Soumilas	Reviewed ECFs 9-16	0.70	\$745.00	\$521.50
02/21/19	John Soumilas	Internal firm meeting re class discovery; outline plan; distribution of assignments	0.90	\$745.00	\$670.50
02/21/19	John Soumilas	Emails regarding discovery issues	1.90	\$745.00	\$1,415.50
02/22/19	John Soumilas	Emails regarding discovery issues	1.00	\$745.00	\$745.00
02/26/19	John Soumilas	Emails regarding calls relating to clien	0.50	\$745.00	\$372.50
02/27/19	John Soumilas	Email re Joint Status Report	0.10	\$745.00	\$74.50

Date	Timekeeper	Narrative	Units	Rate	Value
02/28/19	John Soumilas	Emails regarding joint stipulation	0.70	\$745.00	\$521.50
03/01/19	John Soumilas	Email regarding Order on Motion for Miscellaneous Relief	0.10	\$745.00	\$74.50
03/15/19	John Soumilas	Emails re 26f conference	0.30	\$745.00	\$223.50
03/18/19	John Soumilas	Emails re 26f conference	0.30	\$745.00	\$223.50
03/20/19	John Soumilas	Emails regarding 26(f)	0.50	\$745.00	\$372.50
03/22/19	John Soumilas	Email re Follow up from Rule 26(f) Conference	0.10	\$745.00	\$74.50
03/27/19	John Soumilas	Email re 26(f) conference	0.10	\$745.00	\$74.50
03/28/19	John Soumilas	Emails re Motion to Stay	0.30	\$745.00	\$223.50
03/31/19	John Soumilas	Review motion to stay; select legal research; review local rules re response timing.	3.10	\$745.00	\$2,309.50
04/02/19	John Soumilas	Correspondence and drafts re 26(f)	0.20	\$745.00	\$149.00
04/02/19	John Soumilas	Email regarding Draft Initial Disclosures	0.30	\$745.00	\$223.50
04/03/19	John Soumilas	review and revise memo in opposition to motion to stay	1.40	\$745.00	\$1,043.00
04/07/19	John Soumilas	review latest draft of MOL in opposition to motion to stay; review Rule 26(f) report in connection with same/timing	1.30	\$745.00	\$968.50
04/08/19	John Soumilas	Review latest draft of JRM	0.70	\$745.00	\$521.50
04/09/19	John Soumilas	further correspondence from D counsel re JRM	0.20	\$745.00	\$149.00
04/10/19	John Soumilas	Emails regarding Joint Status Report	0.20	\$745.00	\$149.00
04/14/19	John Soumilas	Review recent decision on stay in TCPA case and correspondence from co-counsel re same	0.80	\$745.00	\$596.00
04/15/19	John Soumilas	review notice of supplemental authority	0.20	\$745.00	\$149.00
04/15/19	John Soumilas	Email regarding Order denying MTD on ATDS and consent issues	0.50	\$745.00	\$372.50
04/29/19	John Soumilas	Email regarding Order denying MTD on ATDS and consent issues	0.20	\$745.00	\$149.00
05/03/19	John Soumilas	Email regarding service of Plaintiff's First Sets of Interrogatories and Requests for Production to Defendant	0.10	\$745.00	\$74.50
05/05/19	John Soumilas	review draft of rogs	0.80	\$745.00	\$596.00
05/20/19	John Soumilas	Email regarding Order denying MTD on ATDS and consent issues	0.30	\$745.00	\$223.50
05/23/19	John Soumilas	Emails regarding revised scheduling order	0.20	\$745.00	\$149.00
05/28/19	John Soumilas	Emails regarding revised scheduling order	0.20	\$745.00	\$149.00
05/29/19	John Soumilas	Emails re 26f conference	0.20	\$745.00	\$149.00
05/31/19	John Soumilas	email regarding Activity in Case 2-19-cv-00175-JLR Samson v. UnitedHealthCare Services Inc Motion to Amend	0.50	\$745.00	\$372.50
06/01/19	John Soumilas	Emails regarding settlement	0.30	\$745.00	\$223.50
06/03/19	John Soumilas	Emails regarding settlement	0.30	\$745.00	\$223.50
06/07/19	John Soumilas	Reviewed emails from defense transmitting discovery reponses	0.20	\$745.00	\$149.00
06/11/19	John Soumilas	Review D s responses to written discovery request to date; review memo from co-counsel re recommendation for meet and confer / strategy; review select documents.	2.90	\$745.00	\$2,160.50

Date	Timekeeper	Narrative	Units	Rate	Value
06/12/19	John Soumilas	Reviewed Jen Murray s summary of disco responses	0.10	\$745.00	\$74.50
06/13/19	John Soumilas	Review meet and confer correspondence; notes re discovery dispute.	0.80	\$745.00	\$596.00
06/13/19	John Soumilas	Email regarding defendant s disco responses	0.10	\$745.00	\$74.50
06/14/19	John Soumilas	Emails regarding defendant s disco responses	1.40	\$745.00	\$1,043.00
06/15/19	John Soumilas	Emails regarding defendant s disco responses	0.20	\$745.00	\$149.00
06/16/19	John Soumilas	doc review; notes	1.10	\$745.00	\$819.50
06/18/19	John Soumilas	Review protective order; review meet and confer notes/ correspondence among co-counsel.	0.70	\$745.00	\$521.50
06/18/19	John Soumilas	email regarding United Healthcare Meet and Confer	0.80	\$745.00	\$596.00
06/19/19	John Soumilas	Review correspondence re meet and confer; also review correspondence re communications with with expert	0.70	\$745.00	\$521.50
06/19/19	John Soumilas	Emails regarding Jennifer Rust Murray Letter to Defense Counsel	1.10	\$745.00	\$819.50
06/20/19	John Soumilas	Emails regarding class-wide calling data	0.60	\$745.00	\$447.00
06/21/19	John Soumilas	Emails regarding potential protective order	0.70	\$745.00	\$521.50
06/27/19	John Soumilas	Emails re call data/call analysis	0.80	\$745.00	\$596.00
07/01/19	John Soumilas	Reviewed email from defense re initial disclosures	0.10	\$745.00	\$74.50
07/02/19	John Soumilas	Emails re document/data production	0.40	\$745.00	\$298.00
07/04/19	John Soumilas	Email re division of labor for discovery	0.40	\$745.00	\$298.00
07/08/19	John Soumilas	Emails re discovery strategy	0.50	\$745.00	\$372.50
07/09/19	John Soumilas	Email re division of labor for discovery	0.40	\$745.00	\$298.00
07/10/19	John Soumilas	Review correspondence re discovery dispute	0.20	\$745.00	\$149.00
07/10/19	John Soumilas	Email regarding Order on Application for Leave to Appear Pro Hac Vice	0.10	\$745.00	\$74.50
07/11/19	John Soumilas	Emails re discovery strategy	0.30	\$745.00	\$223.50
07/12/19	John Soumilas	Emails regarding Document Production	0.20	\$745.00	\$149.00
07/14/19	John Soumilas	Review of parts of doc production; correspondence re same; notes to file	1.60	\$745.00	\$1,192.00
07/15/19	John Soumilas	Emails re discovery strategy	0.70	\$745.00	\$521.50
07/23/19	John Soumilas	Emails regarding deposition notices/upcoming depositions	0.40	\$745.00	\$298.00
07/28/19	John Soumilas	Review correspondence re depositions	0.40	\$745.00	\$298.00
07/28/19	John Soumilas	Email regarding deposition notices/upcoming depositions	0.10	\$745.00	\$74.50
07/30/19	John Soumilas	Review status of deps of Jeannie Jeanette, Adam Frazier, Kevin McGavick, and Hope Miller. Review correspondence re same.	0.80	\$745.00	\$596.00
07/30/19	John Soumilas	Emails regarding Deposition logistics/planning	0.20	\$745.00	\$149.00
07/31/19	John Soumilas	correspondence re upcoming dep	0.40	\$745.00	\$298.00
07/31/19	John Soumilas	Emails regarding Deposition logistics/planning	0.60	\$745.00	\$447.00
08/04/19	John Soumilas	Review dep schedule for September	0.40	\$745.00	\$298.00
08/05/19	John Soumilas	Emails regarding Deposition logistics/planning	0.20	\$745.00	\$149.00

Date	Timekeeper	Narrative	Units	Rate	Value
08/07/19	John Soumilas	Emails regarding Deposition logistics/planning	0.60	\$745.00	\$447.00
08/08/19	John Soumilas	Emails regarding Deposition logistics/planning	0.20	\$745.00	\$149.00
08/12/19	John Soumilas	Emails regarding Deposition logistics/planning	0.80	\$745.00	\$596.00
08/13/19	John Soumilas	Emails regarding Deposition logistics/planning	1.00	\$745.00	\$745.00
08/14/19	John Soumilas	Emails regarding Deposition logistics/planning	0.10	\$745.00	\$74.50
08/19/19	John Soumilas	Emails regarding Deposition logistics/planning	0.50	\$745.00	\$372.50
08/22/19	John Soumilas	Email from JK serving dep notices	0.10	\$745.00	\$74.50
08/30/19	John Soumilas	Emails regarding data production	0.80	\$745.00	\$596.00
08/31/19	John Soumilas	Emails regarding Deposition logistics/planning	0.40	\$745.00	\$298.00
09/02/19	John Soumilas	Emails regarding Deposition logistics/planning	0.10	\$745.00	\$74.50
09/03/19	John Soumilas	Emails regarding Deposition logistics/planning	0.10	\$745.00	\$74.50
09/04/19	John Soumilas	Emails regarding Deposition logistics/planning	0.20	\$745.00	\$149.00
09/05/19	John Soumilas	review correspondence, Millier declaration, data on possible class size.	0.90	\$745.00	\$670.50
09/05/19	John Soumilas	Emails regarding Deposition logistics/planning	1.10	\$745.00	\$819.50
09/09/19	John Soumilas	Review memo re remaining discovery tasks and those assigned to me; come up to speed on various groups that could comprise a class or sub-class	1.70	\$745.00	\$1,266.50
09/09/19	John Soumilas	Emails w. co-counsel re JPA	2.30	\$745.00	\$1,713.50
09/10/19	John Soumilas	meet and confer call with D counsel over discovery items	0.80	\$745.00	\$596.00
09/10/19	John Soumilas	Emails re division of labor for discovery	1.40	\$745.00	\$1,043.00
09/11/19	John Soumilas	review correspondence re additional and missing telephone calls	0.30	\$745.00	\$223.50
09/11/19	John Soumilas	Review correspondence and chart re proposed motion to extend deadlines and dep dates	0.40	\$745.00	\$298.00
09/11/19	John Soumilas	Emails re meet and confer	0.40	\$745.00	\$298.00
09/12/19	John Soumilas	corresp re expert engagement	0.30	\$745.00	\$223.50
09/12/19	John Soumilas	Emails re deposition prep	0.40	\$745.00	\$298.00
09/13/19	John Soumilas	Emails re data analysis	0.40	\$745.00	\$298.00
09/15/19	John Soumilas	correspondence with possible expert	0.70	\$745.00	\$521.50
09/15/19	John Soumilas	Correspondence and coordination re deps of Jeanette and McGavick depositions	0.60	\$745.00	\$447.00
09/16/19	John Soumilas	call with potential expert Christensen; review his engagement letter; review his CV; review prior report on autodialer; notes	2.20	\$745.00	\$1,639.00
09/16/19	John Soumilas	Emails w. potential expert	1.30	\$745.00	\$968.50
09/17/19	John Soumilas	Emails regarding possible expert engagement	0.20	\$745.00	\$149.00
09/18/19	John Soumilas	Emails regarding possible expert engagement	0.10	\$745.00	\$74.50
09/19/19	John Soumilas	review correspondence re client's dep	0.40	\$745.00	\$298.00
09/19/19	John Soumilas	Emails regarding possible expert engagement	0.20	\$745.00	\$149.00
09/21/19	John Soumilas	Emails w. potential expert	0.40	\$745.00	\$298.00

Date	Timekeeper	Narrative	Units	Rate	Value
09/22/19	John Soumilas	Review correspondence re client prep; review additional doc produced by client; research re possible texting claim; notes re same in connection with any possible settlement.	1.30	\$745.00	\$968.50
09/22/19	John Soumilas	Review exert cost invoice and correspondence re same	0.40	\$745.00	\$298.00
09/22/19	John Soumilas	Emails re amending complaint	0.30	\$745.00	\$223.50
09/23/19	John Soumilas	Review motion to extend deadlines; review related correspondence and stats of discovery.	0.30	\$745.00	\$223.50
09/23/19	John Soumilas	Emails regarding expert invoice	0.20	\$745.00	\$149.00
09/24/19	John Soumilas	Review court order re discovery; review status of class identification for do not call list class	0.60	\$745.00	\$447.00
09/24/19	John Soumilas	Emails re depositions	0.50	\$745.00	\$372.50
09/25/19	John Soumilas	Review Plaintiffs Objections, Answers, and Responses to Defendants First Sets of Interrogatories and Requests for Production of Documents, and related correspondence, as well as select docs produced in connection with possible amendment to expand class definition	1.30	\$745.00	\$968.50
09/25/19	John Soumilas	correspondence with co-counsel re expert Christensen.	0.20	\$745.00	\$149.00
09/25/19	John Soumilas	Emails regarding Plaintiffs Objections, Answers and Responses to Defendant s First Interrogatories and Requests for Production	0.20	\$745.00	\$149.00
09/26/19	John Soumilas	Emails re potential expert	0.30	\$745.00	\$223.50
09/27/19	John Soumilas	Email w. potential expert	0.10	\$745.00	\$74.50
09/28/19	John Soumilas	Emails regarding new texts rec d by client	0.30	\$745.00	\$223.50
09/30/19	John Soumilas	Emails regarding new texts rec d by client	0.20	\$745.00	\$149.00
10/01/19	John Soumilas	Review memo on deposition rescheduling; review bios on host of new lawyers entering case; correspondence with co-counsel re same	0.80	\$745.00	\$596.00
10/01/19	John Soumilas	Emails re outstanding discovery issues	0.90	\$745.00	\$670.50
10/02/19	John Soumilas	review inspection request; correspondence re admissions; research re Rule 37(c)(2); corresp re additional expert.	1.30	\$745.00	\$968.50
10/02/19	John Soumilas	Emails in follow-up to call w. Erin Wilson	1.20	\$745.00	\$894.00
10/03/19	John Soumilas	Emails regarding Plaintiff's CR 34 Request for Inspection	1.20	\$745.00	\$894.00
10/04/19	John Soumilas	Email from defense counsel re dep dates	0.10	\$745.00	\$74.50
10/06/19	John Soumilas	corresp re experts	0.60	\$745.00	\$447.00
10/06/19	John Soumilas	corresp re deps of Jeanette and McGavich	0.40	\$745.00	\$298.00
10/07/19	John Soumilas	Emails regarding Plaintiff's potential expert	0.40	\$745.00	\$298.00
10/08/19	John Soumilas	review correspondence re deps and experts	0.70	\$745.00	\$521.50
10/08/19	John Soumilas	Emails re deposition scheduling/logistics	0.70	\$745.00	\$521.50
10/09/19	John Soumilas	call with J.Murray re expert	0.70	\$745.00	\$521.50
10/09/19	John Soumilas	Emails regarding Plaintiff's potential expert	0.70	\$745.00	\$521.50
10/10/19	John Soumilas	Emails regarding TCPA research	0.50	\$745.00	\$372.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/11/19	John Soumilas	Emails re Pl's 2nd RFPS to Def.	0.30	\$745.00	\$223.50
10/13/19	John Soumilas	Correspondence re several depositions; meet with paralegal re court reporter, video, travel, exhibits and other logistics re J. Jeanette deposition	0.90	\$745.00	\$670.50
10/13/19	John Soumilas	corresp re enrollment data; review certain docs re ATDS in connection with need for additional possible expert	0.70	\$745.00	\$521.50
10/14/19	John Soumilas	Emails re status of data production	0.40	\$745.00	\$298.00
10/15/19	John Soumilas	Emails re data analysis of production	0.80	\$745.00	\$596.00
10/16/19	John Soumilas	correspondence re data for expert	0.50	\$745.00	\$372.50
10/16/19	John Soumilas	Meet with J. Francis re deposition of J. Jeanette in Duluth	0.60	\$745.00	\$447.00
10/16/19	John Soumilas	meet and confer call on Rule 30(b)(6) notice; notes; prep for Jeanette deposition	1.60	\$745.00	\$1,192.00
10/16/19	John Soumilas	Emails re outstanding discovery issues	0.50	\$745.00	\$372.50
10/17/19	John Soumilas	Emails regarding Draft Amended Complaint	1.50	\$745.00	\$1,117.50
10/20/19	John Soumilas	Review DISH cert petition in preparation for upcoming depositions and standing issue to be raised in this case; memo to file.	2.50	\$745.00	\$1,862.50
10/21/19	John Soumilas	corresp with D counsel re Friday's deposition in Duluth; coordinate logistics of video conf with paralegal.	0.50	\$745.00	\$372.50
10/22/19	John Soumilas	Prepare for Jeanette deposition, including revised notice, logistics, and review of docs that may be used as exhibits.	1.80	\$745.00	\$1,341.00
10/22/19	John Soumilas	Review legal research re compelling company-wide calling records	0.80	\$745.00	\$596.00
10/22/19	John Soumilas	Emails regarding J. Jeanette Dep.	0.40	\$745.00	\$298.00
10/23/19	John Soumilas	Prepare for J. Jeanette deposition	6.60	\$745.00	\$4,917.00
10/23/19	John Soumilas	Emails regarding calls w. Erin Wilson of Lane Powell	0.50	\$745.00	\$372.50
10/24/19	John Soumilas	review D's response to discovery dispute meet and confer held on October 17, 2019	0.50	\$745.00	\$372.50
10/24/19	John Soumilas	Memo to file and to co-counsel re Jeanette deposition	2.10	\$745.00	\$1,564.50
10/24/19	John Soumilas	Email re document production	0.70	\$745.00	\$521.50
10/25/19	John Soumilas	final prep for, take deposition of J. Jeanette	6.10	\$745.00	\$4,544.50
10/25/19	John Soumilas	Emails regarding Frazier Testimony about Frazier Ex. 1	0.70	\$745.00	\$521.50
10/28/19	John Soumilas	Email regarding follow up to J. Jeanette Dep 10-25-19	0.40	\$745.00	\$298.00
10/29/19	John Soumilas	research re similar lawsuits; consult with outside counsel re identifying class members	0.60	\$745.00	\$447.00
10/29/19	John Soumilas	review Defendant UnitedHealthcare Inc.'s second set of requests for production and second set of interrogatories	0.80	\$745.00	\$596.00
10/29/19	John Soumilas	review corresp re responses to Plaintiffs request for inspection; research re cases cited by D in lengthy letter	0.90	\$745.00	\$670.50
10/29/19	John Soumilas	review corersp/ data re expert report of Randall A. Snyder	0.80	\$745.00	\$596.00
10/29/19	John Soumilas	review and reply to corresp re possible mediation.	0.30	\$745.00	\$223.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/29/19	John Soumilas	Email regarding follow up to J. Jeanette Dep 10-25-19	0.70	\$745.00	\$521.50
10/30/19	John Soumilas	review corresp form client re his deposition	0.20	\$745.00	\$149.00
10/30/19	John Soumilas	prepare corresp re next dep and need for expedited transcript	0.30	\$745.00	\$223.50
10/30/19	John Soumilas	Emails regarding Plaintiff's expert report	1.10	\$745.00	\$819.50
10/31/19	John Soumilas	review Jeanette dep transcript; notes for next set of depositions.	2.40	\$745.00	\$1,788.00
10/31/19	John Soumilas	review dep notices for Laura Rueden, Sarah, Paluczak, and Kevin McGavick and related correspondence	0.30	\$745.00	\$223.50
10/31/19	John Soumilas	strategy conf call among P's counsel	0.70	\$745.00	\$521.50
10/31/19	John Soumilas	Emails re amended Complaint	2.10	\$745.00	\$1,564.50
11/01/19	John Soumilas	Emails re amended Complaint	4.20	\$745.00	\$3,129.00
11/02/19	John Soumilas	Emails w. co-counsel w. exhibit preparation for Rueden Deposition	0.20	\$745.00	\$149.00
11/03/19	John Soumilas	review corresp re exhibits needed for next dep; review same	0.50	\$745.00	\$372.50
11/03/19	John Soumilas	review corresp re motion to compel D produce complete telephone records data; review local rules; review judge's procedures for expedited discovery disputes.	0.90	\$745.00	\$670.50
11/04/19	John Soumilas	Emails regarding preparation for Rueden deposition	1.10	\$745.00	\$819.50
11/05/19	John Soumilas	Review Rueden - Rough Transcript; coordinate / assist J. Francis with next set of deps	2.30	\$745.00	\$1,713.50
11/05/19	John Soumilas	review Boost Mobile's response to subpoena.	0.40	\$745.00	\$298.00
11/05/19	John Soumilas	Emails re document production	0.60	\$745.00	\$447.00
11/06/19	John Soumilas	review D's Objections and Responses to Plaintiff's Notice of Deposition of Sarah Paluczak and Second Amended Notice of Deposition of Kevin McGavick.	0.40	\$745.00	\$298.00
11/06/19	John Soumilas	Review D Motion for Protective Order Proposed Amended Protective Order	0.80	\$745.00	\$596.00
11/06/19	John Soumilas	review report/ corresp re reassigned number analysis	0.70	\$745.00	\$521.50
11/06/19	John Soumilas	Emails regarding Rueden, Paluczak & McGavick Deposition strategy	3.60	\$745.00	\$2,682.00
11/07/19	John Soumilas	review corresp re Anyas report/ reassigned number analysis	0.30	\$745.00	\$223.50
11/07/19	John Soumilas	Emails regarding Plaintiff's expert report	0.60	\$745.00	\$447.00
11/08/19	John Soumilas	Emails regarding Plaintiff's expert report	1.60	\$745.00	\$1,192.00
11/09/19	John Soumilas	Emails re document production	0.40	\$745.00	\$298.00
11/10/19	John Soumilas	review Snyder expert report; corresp among P's counsel; review exhibits attached thereto	1.70	\$745.00	\$1,266.50
11/10/19	John Soumilas	review corresp re call counts; possible class size	0.30	\$745.00	\$223.50
11/10/19	John Soumilas	Emails regarding follow-up to McGavick Deposition	0.30	\$745.00	\$223.50
11/11/19	John Soumilas	review correp re expert report	0.90	\$745.00	\$670.50
11/11/19	John Soumilas	Emails regarding expert report	0.40	\$745.00	\$298.00
11/12/19	John Soumilas	Emails regarding review of McGavick dep transcript	2.60	\$745.00	\$1,937.00
11/13/19	John Soumilas	Emails regarding Plaintiff's Expert Reports	0.30	\$745.00	\$223.50
11/14/19	John Soumilas	Emails regarding Plaintiff's Expert Reports	0.70	\$745.00	\$521.50

Date	Timekeeper	Narrative	Units	Rate	Value
11/15/19	John Soumilas	Emails regarding M&C	0.30	\$745.00	\$223.50
11/17/19	John Soumilas	review corresp re possible motion to compel; legal research re scope of phone data; read cases cited by D	0.90	\$745.00	\$670.50
11/18/19	John Soumilas	review D s reponses to P s second set of doc requests; review/revise proposed meet and confer letter to D counsel re company wide phone data; review corresp among P s counsel re discovery.	1.50	\$745.00	\$1,117.50
11/18/19	John Soumilas	Emails re data/discovery issues	0.90	\$745.00	\$670.50
11/19/19	John Soumilas	corresp among P counsel re motion to compel	0.30	\$745.00	\$223.50
11/19/19	John Soumilas	corresp among P counsel re interest in mediation	0.30	\$745.00	\$223.50
11/19/19	John Soumilas	Emails re raising discovery issues w. defendant	1.10	\$745.00	\$819.50
11/20/19	John Soumilas	corersp re amended responses to written discovery; internal discussion re client contact	0.60	\$745.00	\$447.00
11/20/19	John Soumilas	Emails regarding Plaintiffs Expert Reports	0.20	\$745.00	\$149.00
11/21/19	John Soumilas	review corresp and status of voluminous discovery on the WADAD claim.	0.50	\$745.00	\$372.50
11/21/19	John Soumilas	Emails regarding discovery status	0.50	\$745.00	\$372.50
11/22/19	John Soumilas	Emails re mediation	0.20	\$745.00	\$149.00
11/24/19	John Soumilas	corresp re Plaintiffs responses to D second set of written discovery requests	0.40	\$745.00	\$298.00
11/25/19	John Soumilas	Emails re mediation	0.60	\$745.00	\$447.00
11/26/19	John Soumilas	review Sartell pro hac application	0.20	\$745.00	\$149.00
11/27/19	John Soumilas	Emails re mediation	0.40	\$745.00	\$298.00
11/28/19	John Soumilas	Emails re mediation	0.20	\$745.00	\$149.00
12/01/19	John Soumilas	review files Plaintiffs answers to Defendants first and second interrogatories and responses to Defendants second requests for production of documents.	0.80	\$745.00	\$596.00
12/01/19	John Soumilas	corresp re mediation with L Peterson	0.40	\$745.00	\$298.00
12/02/19	John Soumilas	corresp re mediation scheduling	0.20	\$745.00	\$149.00
12/02/19	John Soumilas	Emails w. co-counsel re Plaintiffs Answers and Responses to Defendant s 1st ROGS, 2nd ROGS and 2nd RFPS	1.00	\$745.00	\$745.00
12/03/19	John Soumilas	corresp re subpoenas to third parties for possible depositions.	0.40	\$745.00	\$298.00
12/03/19	John Soumilas	Emails re division of labor/strategy	1.10	\$745.00	\$819.50
12/05/19	John Soumilas	review d;s mediation proposal and discovery schedule amendments; corresp among P s counsel; corresp to paralegal re planning for 2.12.20 mediation in Seattle	1.10	\$745.00	\$819.50
12/05/19	John Soumilas	Emails re mediation	0.50	\$745.00	\$372.50
12/06/19	John Soumilas	Email re mediation strategy w. co-counsel	0.10	\$745.00	\$74.50
12/08/19	John Soumilas	Corresp among P s counsel re additional calls and scheduling of mediation vis a vis other deadlines	0.40	\$745.00	\$298.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/09/19	John Soumilas	legal research re possible class definition in ED Wash; compare to possible settlement proposed classes; review status of scheduling Feb. mediation	1.80	\$745.00	\$1,341.00
12/09/19	John Soumilas	Emails regarding New UHC blocked call	0.90	\$745.00	\$670.50
12/10/19	John Soumilas	review corresp re pick off offer; internal strategy meeting	0.70	\$745.00	\$521.50
12/10/19	John Soumilas	Emails regarding correspondence from client	0.80	\$745.00	\$596.00
12/11/19	John Soumilas	review expert report of Sonya Kwon; notes; corresp among P s counsel	1.50	\$745.00	\$1,117.50
12/11/19	John Soumilas	Emails regarding correspondence from client	1.00	\$745.00	\$745.00
12/12/19	John Soumilas	Emails regarding Mediation planning with Lou Peterson	0.90	\$745.00	\$670.50
12/13/19	John Soumilas	Email regarding discovery	0.10	\$745.00	\$74.50
12/14/19	John Soumilas	Emails regarding Interrogatories, Set 3 & Request for Production, Set 4	0.10	\$745.00	\$74.50
12/15/19	John Soumilas	review Defendant Third Set of Interrogatories and Fourth Set of Requests for Production	0.90	\$745.00	\$670.50
12/15/19	John Soumilas	review corresp from P co-counsel re D expert report and possible amendment; review D s expert report again and conduct select legal research re pre-recorded voice issues	1.80	\$745.00	\$1,341.00
12/16/19	John Soumilas	review correxp re expert	0.40	\$745.00	\$298.00
12/16/19	John Soumilas	Emails regarding Plaintiff's Expert Reports	0.30	\$745.00	\$223.50
12/17/19	John Soumilas	review corresp re D s third request for production of docs	0.30	\$745.00	\$223.50
12/17/19	John Soumilas	Emails regarding mediation w. Lou Peterson	1.10	\$745.00	\$819.50
12/18/19	John Soumilas	Email from defense counsel transmitting Confidentiality Designations and Errata (Deponent Kevin McGavick)	0.10	\$745.00	\$74.50
12/19/19	John Soumilas	Emails w. co-counsel re data sampling	0.60	\$745.00	\$447.00
12/20/19	John Soumilas	Emails w. all counsel re stip to dismiss WADAD claims	0.10	\$745.00	\$74.50
12/26/19	John Soumilas	correspondence and conf call with co-counsel re strategy matters.	0.90	\$745.00	\$670.50
12/26/19	John Soumilas	review amended complaint; notes re class definitions	0.60	\$745.00	\$447.00
12/26/19	John Soumilas	Emails re data analysis/new related case filed	1.60	\$745.00	\$1,192.00
12/27/19	John Soumilas	Emails re data analysis/new related case filed	1.20	\$745.00	\$894.00
12/30/19	John Soumilas	review corresp re mediation, stip to court,	0.60	\$745.00	\$447.00
12/30/19	John Soumilas	Emails regarding mediation w. Lou Peterson	1.50	\$745.00	\$1,117.50
12/31/19	John Soumilas	Emails regarding mediation w. Lou Peterson	0.80	\$745.00	\$596.00
01/03/20	John Soumilas	Email from defense counsel transmitting regarding Confidentiality Designations and Errata (Deponent Sarah Paluczak)	0.10	\$745.00	\$74.50
01/05/20	John Soumilas	review confidentiality designations and signed errata sheet for the November 7, 2019 deposition of Sarah Paluczak	0.90	\$745.00	\$670.50
01/06/20	John Soumilas	review Lou Peterson's mediation contract and procedural memo; discuss logistics of attendance at mediation with paralegal.	0.80	\$745.00	\$596.00
01/06/20	John Soumilas	Emails regarding Mediation Confirmation	0.30	\$745.00	\$223.50

Date	Timekeeper	Narrative	Units	Rate	Value
01/08/20	John Soumilas	Review motion for interim appointment of class counsel; notes; correspondence among P s counsel re competing case	1.30	\$745.00	\$968.50
01/09/20	John Soumilas	Review motion for leave to amend complaint; edits	0.80	\$745.00	\$596.00
01/09/20	John Soumilas	review further corresp re mediation with Lou Peterson; logistics re pre-mediation call with same	0.60	\$745.00	\$447.00
01/09/20	John Soumilas	Email regarding discovery	0.80	\$745.00	\$596.00
01/10/20	John Soumilas	Emails regarding mediation w. Lou Peterson	0.20	\$745.00	\$149.00
01/13/20	John Soumilas	Emails regarding Motion for Interim Lead	0.20	\$745.00	\$149.00
01/14/20	John Soumilas	Email regarding invoice 1314 from Class Experts Group, LLC	0.10	\$745.00	\$74.50
01/15/20	John Soumilas	call with co-counsel re class size data and amending complaint	0.60	\$745.00	\$447.00
01/15/20	John Soumilas	Emails regarding Motion for leave to amend	0.40	\$745.00	\$298.00
01/16/20	John Soumilas	correspondence re call with D counsel prior to cal with mediator Peterson	0.30	\$745.00	\$223.50
01/16/20	John Soumilas	Emails regarding mediation w. Lou Peterson	0.20	\$745.00	\$149.00
01/22/20	John Soumilas	Emails re letters to UHC memorializing most favored nation/complaint	1.20	\$745.00	\$894.00
01/23/20	John Soumilas	correspondence among P s counsel re Monday s call with Lou Peterson and mediation memo	0.30	\$745.00	\$223.50
01/23/20	John Soumilas	Emails re letters to UHC memorializing most favored nation/complaint	0.20	\$745.00	\$149.00
01/24/20	John Soumilas	Emails regarding pre-mediation telephone conference	0.20	\$745.00	\$149.00
01/26/20	John Soumilas	call and corersp with co-counsel in advance of call with mediator; prep and call with L. Petersen re Feb 12 mediation; memo to file after; discuss demand strategy	1.90	\$745.00	\$1,415.50
01/27/20	John Soumilas	research in preparation for mediation; meet with paralegal re logistics / mediation fee, etc.	0.90	\$745.00	\$670.50
01/27/20	John Soumilas	Emails regarding mediation	1.00	\$745.00	\$745.00
01/28/20	John Soumilas	Emails re final numbers from expert	0.20	\$745.00	\$149.00
01/29/20	John Soumilas	review correspondence re additional l cases that may be subject to / covered by upcoming mediation	0.40	\$745.00	\$298.00
01/29/20	John Soumilas	Emails re potential agreement for motion for interim lead counsel/motion for leave to amend	0.40	\$745.00	\$298.00
01/30/20	John Soumilas	review docs and dep transcripts for select information; review and revise settlement conference memo.	4.90	\$745.00	\$3,650.50
01/30/20	John Soumilas	Emails re potential agreement for motion for interim lead counsel/motion for leave to amend	0.30	\$745.00	\$223.50
01/31/20	John Soumilas	Emails regarding draft mediation letter	1.40	\$745.00	\$1,043.00
02/02/20	John Soumilas	review D s mediation statement and exhibits; meet with paralegal re research re other TCPA class settlements	2.90	\$745.00	\$2,160.50
02/02/20	John Soumilas	correp re call with client	0.20	\$745.00	\$149.00
02/03/20	John Soumilas	Emails regarding mediation	0.70	\$745.00	\$521.50
02/04/20	John Soumilas	Emails regarding UHC databreach	0.20	\$745.00	\$149.00
02/06/20	John Soumilas	research re 17 other TCPA class settlements in preparation for next wee s mediation	4.50	\$745.00	\$3,352.50

Date	Timekeeper	Narrative	Units	Rate	Value
02/06/20	John Soumilas	Email regarding mediation	0.10	\$745.00	\$74.50
02/09/20	John Soumilas	review binder need for mediation.	0.50	\$745.00	\$372.50
02/10/20	John Soumilas	prepare for while traveling to Seattle for tomorrow s mediation with Lou Peterson	8.90	\$745.00	\$6,630.50
02/11/20	John Soumilas	prepare for and attend mediation with Lou Peterson in Seattle; meeting with co-counsel after re strategy	11.50	\$745.00	\$8,567.50
02/12/20	John Soumilas	travel back to office after mediation; prepare memo re mediation and next steps	7.70	\$745.00	\$5,736.50
02/12/20	John Soumilas	Emails re mediation preparation	2.10	\$745.00	\$1,564.50
02/13/20	John Soumilas	Emails regarding strategy memo	0.70	\$745.00	\$521.50
02/14/20	John Soumilas	Emails regarding MDL uestion	0.80	\$745.00	\$596.00
02/15/20	John Soumilas	Emails re other related cases	0.10	\$745.00	\$74.50
02/17/20	John Soumilas	research re other cases, and judges; outline plan for possible MDL; call among P s counsel	3.10	\$745.00	\$2,309.50
02/17/20	John Soumilas	Emails regarding call with Anthony Paronich --MDL uestion	0.60	\$745.00	\$447.00
02/18/20	John Soumilas	review recent 7th cir auto dialer decision; corresp among P s counsel	1.10	\$745.00	\$819.50
02/18/20	John Soumilas	Emails regarding call with Anthony Paronich --MDL uestion	0.60	\$745.00	\$447.00
02/19/20	John Soumilas	corresp with co-counsel ere D s pick-off attempts	0.20	\$745.00	\$149.00
02/19/20	John Soumilas	corersp to and from P s counsel re possible coordination with multiple cases	0.50	\$745.00	\$372.50
02/19/20	John Soumilas	Emails regarding ATDS decision out of 7C	1.00	\$745.00	\$745.00
02/20/20	John Soumilas	call and corresp with co-counsel re status of global settlement discussion, others Ps lawyers, discussions with D counsel and next week s call with mediator.	1.10	\$745.00	\$819.50
02/20/20	John Soumilas	Emails re other related cases	0.60	\$745.00	\$447.00
02/21/20	John Soumilas	Emails regarding call with Erin Hoffman	1.00	\$745.00	\$745.00
02/24/20	John Soumilas	corresp re Facebook cert denial decision, status of settlement talks	0.40	\$745.00	\$298.00
02/25/20	John Soumilas	further corresp re Facebook case and JPA	0.40	\$745.00	\$298.00
02/25/20	John Soumilas	Emails regarding Draft JPA	0.50	\$745.00	\$372.50
02/26/20	John Soumilas	Emails regarding Draft JPA	1.20	\$745.00	\$894.00
02/27/20	John Soumilas	review supp expert report; notes confer with J. Francis re expert deps	1.20	\$745.00	\$894.00
02/27/20	John Soumilas	call with mediator -- and discussions among P s counsel re approach to progress in mediation	0.80	\$745.00	\$596.00
02/27/20	John Soumilas	Emails regarding Draft JPA	0.20	\$745.00	\$149.00
02/28/20	John Soumilas	Emails regarding Mediation with Lou Peterson	1.30	\$745.00	\$968.50
03/01/20	John Soumilas	review rebuttal expert report	1.10	\$745.00	\$819.50
03/01/20	John Soumilas	review corresp re next meditation call	0.20	\$745.00	\$149.00
03/02/20	John Soumilas	Email regarding Samson Expert Report	0.10	\$745.00	\$74.50
03/03/20	John Soumilas	EMails regarding outstanding discovery issues/strategy	2.30	\$745.00	\$1,713.50
03/04/20	John Soumilas	Emails regarding Mediation	0.40	\$745.00	\$298.00
03/05/20	John Soumilas	Email regarding TCPA case at Supreme Court	0.10	\$745.00	\$74.50

Date	Timekeeper	Narrative	Units	Rate	Value
03/06/20	John Soumilas	Emails regarding Mediation	0.50	\$745.00	\$372.50
03/07/20	John Soumilas	Emails re expert deposition scheduling	0.40	\$745.00	\$298.00
03/09/20	John Soumilas	Emails regarding Mediation	0.20	\$745.00	\$149.00
03/11/20	John Soumilas	Email regarding UHC Depositions and P s expert bill	0.10	\$745.00	\$74.50
03/13/20	John Soumilas	Emails re expert deposition scheduling	0.80	\$745.00	\$596.00
03/15/20	John Soumilas	review corresp re expert deps.	0.40	\$745.00	\$298.00
03/16/20	John Soumilas	Emails regarding expert bills	0.50	\$745.00	\$372.50
03/17/20	John Soumilas	Emails regarding case status updates	0.30	\$745.00	\$223.50
03/19/20	John Soumilas	Emails re mediation preparation	0.70	\$745.00	\$521.50
03/20/20	John Soumilas	Emails re mediation preparation	0.80	\$745.00	\$596.00
03/24/20	John Soumilas	Email re mediation follow up call	0.20	\$745.00	\$149.00
03/25/20	John Soumilas	Email re mediation follow up call	0.40	\$745.00	\$298.00
03/30/20	John Soumilas	Email re mediation follow up call	0.60	\$745.00	\$447.00
03/31/20	John Soumilas	Emails re follow up call re mediation	0.40	\$745.00	\$298.00
04/01/20	John Soumilas	Emails re extension request	1.60	\$745.00	\$1,192.00
04/02/20	John Soumilas	Emails re extension request	1.60	\$745.00	\$1,192.00
04/03/20	John Soumilas	Email regarding Stipulation	0.10	\$745.00	\$74.50
04/06/20	John Soumilas	Emails regarding Order on Stipulation	0.60	\$745.00	\$447.00
04/07/20	John Soumilas	Emails re deposition notices	1.20	\$745.00	\$894.00
04/08/20	John Soumilas	Emails re deposition notices	0.20	\$745.00	\$149.00
04/10/20	John Soumilas	Emails re conference call w. counsel	0.50	\$745.00	\$372.50
04/13/20	John Soumilas	Email re conference call w. counsel	0.10	\$745.00	\$74.50
04/14/20	John Soumilas	Emails regarding Revised Sonya Kwon Deposition Notice and Subpoena to Testify	0.80	\$745.00	\$596.00
04/16/20	John Soumilas	Emails re viability of Defendant	0.40	\$745.00	\$298.00
04/16/20	John Soumilas	Emails re defendant s proposed stipulation	0.70	\$745.00	\$521.50
04/17/20	John Soumilas	Emails re virtual dep practices	1.40	\$745.00	\$1,043.00
04/19/20	John Soumilas	Email from D transmitting native exhibits to Kwan report	0.10	\$745.00	\$74.50
04/20/20	John Soumilas	Emails re mediation logistics	0.70	\$745.00	\$521.50
04/21/20	John Soumilas	Emails re dep prep	1.40	\$745.00	\$1,043.00
04/22/20	John Soumilas	Emails re dep logistics	0.30	\$745.00	\$223.50
04/23/20	John Soumilas	Emails regarding Kwon Supplemental Report	0.40	\$745.00	\$298.00
04/27/20	John Soumilas	Email re status of other cases and task list	0.10	\$745.00	\$74.50
04/29/20	John Soumilas	Email re meet and confer	0.10	\$745.00	\$74.50
05/07/20	John Soumilas	Emails re class cert brief review	0.50	\$745.00	\$372.50
05/08/20	John Soumilas	Emails re Motion to Certify Class	1.20	\$745.00	\$894.00

Date	Timekeeper	Narrative	Units	Rate	Value
05/09/20	John Soumilas	Emails re class cert brief redactions	0.30	\$745.00	\$223.50
05/10/20	John Soumilas	Email re class cert brief redactions	0.10	\$745.00	\$74.50
05/15/20	John Soumilas	Emails re mediation	0.30	\$745.00	\$223.50
05/16/20	John Soumilas	Emails re mediation	0.30	\$745.00	\$223.50
05/17/20	John Soumilas	Emails re mediation	0.20	\$745.00	\$149.00
05/18/20	John Soumilas	Emails re mediation	0.20	\$745.00	\$149.00
05/19/20	John Soumilas	Email regarding TCPA Comps	0.70	\$745.00	\$521.50
05/28/20	John Soumilas	re corresp re Intent to Serve Subpoena and Allied Universal Subpoena; status of other third party discovery	0.40	\$745.00	\$298.00
05/28/20	John Soumilas	Email regarding P s discovery responses	0.10	\$745.00	\$74.50
05/29/20	John Soumilas	Emails re Notice of Intent to Serve Subpoena and Allied Universal Subpoena	0.10	\$745.00	\$74.50
06/01/20	John Soumilas	Emails re discovery strategy	0.20	\$745.00	\$149.00
06/02/20	John Soumilas	Emails re discovery strategy	1.30	\$745.00	\$968.50
06/03/20	John Soumilas	Emails re discovery strategy	0.10	\$745.00	\$74.50
06/09/20	John Soumilas	Email regarding Class Cert Opposition	0.10	\$745.00	\$74.50
06/10/20	John Soumilas	Emails regarding Expert Depo Invoices	1.40	\$745.00	\$1,043.00
06/15/20	John Soumilas	Emails regarding wrong number briefing	0.40	\$745.00	\$298.00
06/16/20	John Soumilas	Emails regarding Draft 23a4 reply	1.60	\$745.00	\$1,192.00
06/18/20	John Soumilas	Emails regarding Draft 23a4 reply	0.20	\$745.00	\$149.00
06/19/20	John Soumilas	Emails regarding Draft 23a4 reply	1.40	\$745.00	\$1,043.00
06/22/20	John Soumilas	correp re related cases and possible universal settlement	0.40	\$745.00	\$298.00
06/23/20	John Soumilas	Email regarding UHC-related cases	0.20	\$745.00	\$149.00
07/07/20	John Soumilas	Emails re mediation	0.30	\$745.00	\$223.50
07/09/20	John Soumilas	Emails regarding Facebook appeal	0.60	\$745.00	\$447.00
07/14/20	John Soumilas	emails regarding RE- IRG v. Lloyd s London	0.80	\$745.00	\$596.00
07/15/20	John Soumilas	emails regarding RE- IRG v. Lloyd s London	0.20	\$745.00	\$149.00
07/22/20	John Soumilas	Emails re case next steps/strategy	0.20	\$745.00	\$149.00
07/24/20	John Soumilas	Emails re case next steps/strategy	0.10	\$745.00	\$74.50
07/27/20	John Soumilas	Emails re case next steps/strategy	0.70	\$745.00	\$521.50
07/28/20	John Soumilas	Email re order relating case	0.20	\$745.00	\$149.00
08/21/20	John Soumilas	Email re Marden s Ark case	0.10	\$745.00	\$74.50
12/21/20	John Soumilas	Emails scheduling call	0.20	\$745.00	\$149.00
08/17/21	John Soumilas	Reviewed ECF 157	0.10	\$745.00	\$74.50
02/17/22	John Soumilas	Reviewed ECF 158	0.10	\$745.00	\$74.50
09/01/22	John Soumilas	Emails re briefing on Stay	0.50	\$745.00	\$372.50

Date	Timekeeper	Narrative	Units	Rate	Value
09/14/22	John Soumilas	Emails regarding Motion to Lift Stay	0.10	\$745.00	\$74.50
09/16/22	John Soumilas	Emails re briefing on Stay	0.40	\$745.00	\$298.00
12/20/22	John Soumilas	review order on motion to lift stay; review corresp among P s counsel re next steps	1.10	\$745.00	\$819.50
12/20/22	John Soumilas	Emails re Order lifting stay/next steps	1.20	\$745.00	\$894.00
12/21/22	John Soumilas	Emails re Order lifting stay/next steps	0.80	\$745.00	\$596.00
12/27/22	John Soumilas	strategy meeting with co-counsel re motion to left stay and order, next steps, notes to file	1.10	\$745.00	\$819.50
12/27/22	John Soumilas	review recent SCOTUS and First Circuit case in preparation for renewed motion for class cert	1.80	\$745.00	\$1,341.00
12/28/22	John Soumilas	review further corresp re recent decisions and need for follow-up discovery; draft same	0.90	\$745.00	\$670.50
12/28/22	John Soumilas	Emails re Order lifting stay/next steps	0.80	\$745.00	\$596.00
01/03/23	John Soumilas	review class size data in preparation for renewed motion for class cert; corresp among P s counsel re motion strategy considerations.	1.20	\$745.00	\$894.00
01/04/23	John Soumilas	Emails re Order lifting stay/next steps	0.30	\$745.00	\$223.50
01/05/23	John Soumilas	Emails re Order lifting stay/next steps	0.30	\$745.00	\$223.50
01/09/23	John Soumilas	review renewed motion for class cert; research for meeting with co-counsel	3.80	\$745.00	\$2,831.00
01/09/23	John Soumilas	Emails re Order lifting stay/next steps	0.10	\$745.00	\$74.50
01/17/23	John Soumilas	Emails regarding renewed motion for class cert	0.20	\$745.00	\$149.00
01/19/23	John Soumilas	Emails regarding renewed motion for class cert	1.90	\$745.00	\$1,415.50
01/20/23	John Soumilas	Emails re upcoming motions	0.40	\$745.00	\$298.00
01/25/23	John Soumilas	Emails re Briefing Schedule on Upcoming Motions	0.20	\$745.00	\$149.00
01/26/23	John Soumilas	review motion to seal corresp in relation to MCC; review select dos in file	1.60	\$745.00	\$1,192.00
01/26/23	John Soumilas	Emails re Briefing Schedule on Upcoming Motions	0.20	\$745.00	\$149.00
01/27/23	John Soumilas	Emails re P s Production	0.50	\$745.00	\$372.50
01/31/23	John Soumilas	Email re Briefing Schedule on Upcoming Motions	0.10	\$745.00	\$74.50
02/02/23	John Soumilas	Review ECFs 182-183	0.20	\$745.00	\$149.00
02/03/23	John Soumilas	review joint motion re briefing schedule	0.60	\$745.00	\$447.00
02/03/23	John Soumilas	Emails re Upcoming Motion Logistics/strategy	0.70	\$745.00	\$521.50
02/10/23	John Soumilas	Email re Order on Motion for Leave to File Over-length Motions and Briefs	0.10	\$745.00	\$74.50
02/14/23	John Soumilas	Email re Joint Status Report Order Form for District Judges	0.10	\$745.00	\$74.50
02/17/23	John Soumilas	Email regarding opposition to motion to dismiss	0.10	\$745.00	\$74.50
02/20/23	John Soumilas	Emails regarding opposition to motion to dismiss	0.50	\$745.00	\$372.50
02/21/23	John Soumilas	Emails re call reordings/do-not-call class w. defense counsel and p s counsel	1.10	\$745.00	\$819.50
02/22/23	John Soumilas	Emails re class certification motion/response w. all counsel	3.10	\$745.00	\$2,309.50
02/24/23	John Soumilas	Reviewed ECF 219	0.10	\$745.00	\$74.50
02/25/23	John Soumilas	Reviewed ECF 220	0.10	\$745.00	\$74.50

Date	Timekeeper	Narrative	Units	Rate	Value
02/27/23	John Soumilas	Reviewed ECF 221	0.10	\$745.00	\$74.50
03/01/23	John Soumilas	Emails re Suffolk Data Breach - Consolidation Motion	0.60	\$745.00	\$447.00
03/02/23	John Soumilas	Email regarding United Class Cert Reply	0.20	\$745.00	\$149.00
03/03/23	John Soumilas	Emails regarding Sealing Issues for Class Cert Reply	1.40	\$745.00	\$1,043.00
03/06/23	John Soumilas	Emails regarding Samson v. UHC 26(f) Conference	0.40	\$745.00	\$298.00
03/07/23	John Soumilas	Email re Order on Motion for Miscellaneous Relief	0.10	\$745.00	\$74.50
03/08/23	John Soumilas	Review SURREPLY filed by Defendant UnitedHealthCare Services Inc re 172 MOTION Plaintiff's Renewed Motion for Class Certification (Duffy, Barbara)	1.60	\$745.00	\$1,192.00
03/08/23	John Soumilas	Email re Surreply	0.10	\$745.00	\$74.50
03/09/23	John Soumilas	Emails re UHC 26(f) Conference	0.10	\$745.00	\$74.50
03/10/23	John Soumilas	Emails re UHC 26(f) Conference	0.80	\$745.00	\$596.00
03/20/23	John Soumilas	Reviewed ECF 236	0.10	\$745.00	\$74.50
03/21/23	John Soumilas	Emails re supplemental disclosures	0.30	\$745.00	\$223.50
03/23/23	John Soumilas	Emails regarding 26(f) Conference	0.20	\$745.00	\$149.00
03/24/23	John Soumilas	Email regarding 26(f) Conference	0.10	\$745.00	\$74.50
03/27/23	John Soumilas	Emails regarding 26(f) Conference	0.40	\$745.00	\$298.00
04/13/23	John Soumilas	Emails regarding Joint Status Report	0.50	\$745.00	\$372.50
05/04/23	John Soumilas	Emails re scheduling motion for class cert oral argument	1.10	\$745.00	\$819.50
05/15/23	John Soumilas	Emails re scheduling motion for class cert oral argument	0.30	\$745.00	\$223.50
05/22/23	John Soumilas	Emails re scheduling motion for class cert oral argument	1.30	\$745.00	\$968.50
05/23/23	John Soumilas	Emails re scheduling motion for class cert oral argument	1.90	\$745.00	\$1,415.50
06/05/23	John Soumilas	email regarding motion to seal	0.10	\$745.00	\$74.50
06/06/23	John Soumilas	Emails re meet and confer	1.70	\$745.00	\$1,266.50
06/08/23	John Soumilas	Emails re strategy meeting	0.50	\$745.00	\$372.50
06/14/23	John Soumilas	Emails re settlement negotiation strategy/planning	0.40	\$745.00	\$298.00
06/15/23	John Soumilas	Emails re settlement negotiation strategy/planning	0.30	\$745.00	\$223.50
06/16/23	John Soumilas	Emails re settlement negotiation strategy/planning	0.50	\$745.00	\$372.50
06/17/23	John Soumilas	Email re settlement negotiation strategy/planning	0.10	\$745.00	\$74.50
06/18/23	John Soumilas	Email re settlement negotiation strategy/planning	0.10	\$745.00	\$74.50
06/19/23	John Soumilas	Emails re conversation w. defense counsel	0.60	\$745.00	\$447.00
06/20/23	John Soumilas	Emails re mediation planning	0.50	\$745.00	\$372.50
06/21/23	John Soumilas	EMails re settlement negotiation/strategy	2.00	\$745.00	\$1,490.00
06/22/23	John Soumilas	EMails re settlement negotiation/strategy	1.70	\$745.00	\$1,266.50
06/23/23	John Soumilas	Emails regarding 6/23/23 Telephone Conference	0.40	\$745.00	\$298.00
07/06/23	John Soumilas	Reviewed ECFs 245-247	0.30	\$745.00	\$223.50

Date	Timekeeper	Narrative	Units	Rate	Value
07/07/23	John Soumilas	Email re settlement	0.10	\$745.00	\$74.50
07/13/23	John Soumilas	Email regarding draft JPA	0.10	\$745.00	\$74.50
07/14/23	John Soumilas	Emails regarding settlement	0.40	\$745.00	\$298.00
07/21/23	John Soumilas	Email regarding draft JPA	0.10	\$745.00	\$74.50
07/24/23	John Soumilas	Emails regarding draft JPA	0.70	\$745.00	\$521.50
07/27/23	John Soumilas	Emails re mediation/mediation agreement	0.40	\$745.00	\$298.00
07/31/23	John Soumilas	Emails regarding Mediation Confirmation Letter	0.20	\$745.00	\$149.00
08/02/23	John Soumilas	Emails re mediation/mediation agreement	0.30	\$745.00	\$223.50
08/03/23	John Soumilas	Emails re mediation/mediation agreement	2.40	\$745.00	\$1,788.00
08/04/23	John Soumilas	Emails regarding Joint Status Report	0.30	\$745.00	\$223.50
08/07/23	John Soumilas	Emails regarding Confidential Mediation Agreement	1.70	\$745.00	\$1,266.50
08/08/23	John Soumilas	Emails re mediation	0.30	\$745.00	\$223.50
08/09/23	John Soumilas	Emails regarding Mediation	0.90	\$745.00	\$670.50
08/10/23	John Soumilas	Emails re settlement strategy (FMS internal)	0.70	\$745.00	\$521.50
08/11/23	John Soumilas	Emails regarding Term Sheet	0.20	\$745.00	\$149.00
08/12/23	John Soumilas	Emails re settlement negotiations	1.10	\$745.00	\$819.50
08/14/23	John Soumilas	Emails re Joint Status Report	0.60	\$745.00	\$447.00
08/15/23	John Soumilas	Email re Status Report	0.10	\$745.00	\$74.50
08/18/23	John Soumilas	Reviewed email forwarding Mediator's Proposal	0.10	\$745.00	\$74.50
08/21/23	John Soumilas	Reviewed ECF 252-253	0.20	\$745.00	\$149.00
08/22/23	John Soumilas	Emails re Joint Status Report	0.70	\$745.00	\$521.50
08/30/23	John Soumilas	Emails re Joint Status Report	0.50	\$745.00	\$372.50
08/31/23	John Soumilas	Reviewed ECF 258	0.10	\$745.00	\$74.50
09/08/23	John Soumilas	Reviewed ECF 260	0.10	\$745.00	\$74.50
09/13/23	John Soumilas	Emails re scheduling oral argument for motion for class cert	0.20	\$745.00	\$149.00
09/14/23	John Soumilas	Emails re scheduling oral argument for motion for class cert	0.30	\$745.00	\$223.50
10/04/23	John Soumilas	Emails regarding class cert oral argument	0.50	\$745.00	\$372.50
10/05/23	John Soumilas	Emails regarding class cert oral argument	0.30	\$745.00	\$223.50
10/06/23	John Soumilas	Emails regarding Burden of Proof at Class Certification Stage	0.50	\$745.00	\$372.50
10/09/23	John Soumilas	Email regarding Burden of Proof at Class Certification Stage	0.10	\$745.00	\$74.50
10/13/23	John Soumilas	Emails re class certification decision	2.30	\$745.00	\$1,713.50
10/16/23	John Soumilas	Emails re subpoena/discovery strategy	1.20	\$745.00	\$894.00
10/18/23	John Soumilas	Emails regarding meet and confer	0.60	\$745.00	\$447.00
10/19/23	John Soumilas	Emails re Notice Plan	0.50	\$745.00	\$372.50
10/20/23	John Soumilas	Emails re Notice Plan	0.70	\$745.00	\$521.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/24/23	John Soumilas	Email re Notice of Filing of Official Transcript	0.10	\$745.00	\$74.50
10/27/23	John Soumilas	Emails re notice preparation/materials/logistics	1.50	\$745.00	\$1,117.50
10/28/23	John Soumilas	Email regarding Meet and Confer	0.10	\$745.00	\$74.50
10/30/23	John Soumilas	Emails regarding meet and confer/submissions re notice	2.20	\$745.00	\$1,639.00
11/03/23	John Soumilas	Emails regarding Answer to appellate Petition	0.20	\$745.00	\$149.00
11/06/23	John Soumilas	Emails regarding Answer to appellate Petition	0.70	\$745.00	\$521.50
11/07/23	John Soumilas	Emails re BMS issue briefing	0.30	\$745.00	\$223.50
11/08/23	John Soumilas	Email re Order on Motion to Seal	0.10	\$745.00	\$74.50
11/09/23	John Soumilas	Emails re BMS issue briefing	0.20	\$745.00	\$149.00
11/14/23	John Soumilas	Email re defendant s supplemental disclosures	0.10	\$745.00	\$74.50
11/16/23	John Soumilas	Emails re raised amended complaint issue	0.40	\$745.00	\$298.00
11/17/23	John Soumilas	Emails re raised amended complaint issue	0.30	\$745.00	\$223.50
11/22/23	John Soumilas	Emails re United BMS Brief	0.50	\$745.00	\$372.50
11/27/23	John Soumilas	Emails re Resp to MTD Claims of Non-WA Class Members.docx	0.30	\$745.00	\$223.50
12/01/23	John Soumilas	Email re Reply to Response to MTD	0.10	\$745.00	\$74.50
12/05/23	John Soumilas	Emails re Joint Status Report Order	0.20	\$745.00	\$149.00
12/14/23	John Soumilas	Emails re D s appeal	0.50	\$745.00	\$372.50
12/18/23	John Soumilas	Emails re D s appeal	0.60	\$745.00	\$447.00
12/19/23	John Soumilas	Emails re D s appeal	0.40	\$745.00	\$298.00
12/20/23	John Soumilas	Email re D s appeal	0.10	\$745.00	\$74.50
12/27/23	John Soumilas	Emails re D s appeal	1.70	\$745.00	\$1,266.50
12/28/23	John Soumilas	Emails re Navient data	0.30	\$745.00	\$223.50
12/29/23	John Soumilas	Emails re meet and confer	0.30	\$745.00	\$223.50
01/03/24	John Soumilas	Emails re meet and confer	0.30	\$745.00	\$223.50
01/05/24	John Soumilas	Emails re call agent discovery	0.20	\$745.00	\$149.00
01/10/24	John Soumilas	Email re protective order	0.10	\$745.00	\$74.50
01/11/24	John Soumilas	Emails re protective order	0.50	\$745.00	\$372.50
01/12/24	John Soumilas	Emails re outstanding disputes/status report	0.60	\$745.00	\$447.00
01/16/24	John Soumilas	Emails re outstanding disputes/status report	1.40	\$745.00	\$1,043.00
01/18/24	John Soumilas	Email re Order on Motion to Compel	0.10	\$745.00	\$74.50
01/22/24	John Soumilas	Emails re Class List	0.20	\$745.00	\$149.00
01/29/24	John Soumilas	Emails re Motion to Compel	0.20	\$745.00	\$149.00
02/05/24	John Soumilas	Emails re dep logistics	0.20	\$745.00	\$149.00
02/06/24	John Soumilas	Emails re scheduling motion to dismiss hearing	0.50	\$745.00	\$372.50
02/13/24	John Soumilas	Email regarding Class Cert	0.20	\$745.00	\$149.00

Date	Timekeeper	Narrative	Units	Rate	Value
02/16/24	John Soumilas	Email regarding production letter	0.10	\$745.00	\$74.50
02/17/24	John Soumilas	Emails regarding production letter	0.30	\$745.00	\$223.50
02/19/24	John Soumilas	Emails regarding production letter	0.10	\$745.00	\$74.50
02/21/24	John Soumilas	Emails re motion to dismiss hearing logistics	0.20	\$745.00	\$149.00
02/28/24	John Soumilas	Emails regarding Klatt deposition transcript review	0.30	\$745.00	\$223.50
02/29/24	John Soumilas	Emails re order on motion to dismiss	0.20	\$745.00	\$149.00
03/04/24	John Soumilas	Email re UnitedHealthCare Services Inc Answer to Amended Complaint	0.10	\$745.00	\$74.50
03/18/24	John Soumilas	Emails re joint status report, call recording review, and initial disclosures	1.20	\$745.00	\$894.00
03/19/24	John Soumilas	Emails re Motion to Compel	0.20	\$745.00	\$149.00
03/22/24	John Soumilas	Emails re Order on Motion to Compel	0.20	\$745.00	\$149.00
03/27/24	John Soumilas	Email re T-Mobile Subpoena Response	0.10	\$745.00	\$74.50
04/16/24	John Soumilas	Reviewed ECF 301	0.10	\$745.00	\$74.50
04/22/24	John Soumilas	Emails re data review	0.30	\$745.00	\$223.50
04/23/24	John Soumilas	Emails re Joint Status Report	0.20	\$745.00	\$149.00
07/29/24	John Soumilas	Emails re Stipulated Motion	0.20	\$745.00	\$149.00
07/30/24	John Soumilas	Emails re Correspondence re Meet and Confer	0.20	\$745.00	\$149.00
07/31/24	John Soumilas	Emails re Order on Stipulated Motion	0.30	\$745.00	\$223.50
08/01/24	John Soumilas	Emails re data review	0.50	\$745.00	\$372.50
08/05/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.40	\$745.00	\$298.00
08/06/24	John Soumilas	Emails re data review	0.30	\$745.00	\$223.50
08/07/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/12/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/13/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/14/24	John Soumilas	Emails re 4th Set of RFPs	0.10	\$745.00	\$74.50
08/15/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/16/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/22/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.20	\$745.00	\$149.00
08/23/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/26/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.30	\$745.00	\$223.50
08/27/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.10	\$745.00	\$74.50
08/28/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.30	\$745.00	\$223.50
09/03/24	John Soumilas	Emails re 3rd Set of RFPs and Deposition Notices	0.30	\$745.00	\$223.50
09/04/24	John Soumilas	Email re Expert Report of Gregory Russo	0.10	\$745.00	\$74.50
09/16/24	John Soumilas	Emails re Physical Filing of Audio Recordings	0.60	\$745.00	\$447.00
09/17/24	John Soumilas	Emails re data review	0.30	\$745.00	\$223.50

Date	Timekeeper	Narrative	Units	Rate	Value
09/18/24	John Soumilas	Emails re data review	0.30	\$745.00	\$223.50
10/16/24	John Soumilas	Emails re Verkhovskaya Deposition--Confidentiality Designation	0.20	\$745.00	\$149.00
10/21/24	John Soumilas	Email re Discovery Correspondence and 30(b)(6) Notice of Deposition	0.10	\$745.00	\$74.50
10/22/24	John Soumilas	Emails re Discovery Correspondence and 30(b)(6) Notice of Deposition	0.30	\$745.00	\$223.50
10/25/24	John Soumilas	Emails re Samson--Any Invoices	0.20	\$745.00	\$149.00
10/31/24	John Soumilas	Emails regarding settlement	1.00	\$745.00	\$745.00
11/01/24	John Soumilas	Emails re Draft Email to Judge Pechman/settlement talks	1.10	\$745.00	\$819.50
11/02/24	John Soumilas	Reviewed email from Jennifer Murray enclosing term sheet	0.10	\$745.00	\$74.50
11/04/24	John Soumilas	Emails re Confidential Settlement Term Sheet	0.60	\$745.00	\$447.00
11/08/24	John Soumilas	Emails re Confidential Settlement Term Sheet	0.30	\$745.00	\$223.50
11/13/24	John Soumilas	Email re Confidential Settlement Term Sheet	0.10	\$745.00	\$74.50
01/15/25	John Soumilas	Emails regarding preliminary approval/notice	0.50	\$745.00	\$372.50
01/16/25	John Soumilas	Email re Notice Documents	0.20	\$745.00	\$149.00
01/17/25	John Soumilas	Email from JAF staff/attorneys re preparation of fee petition materials	0.10	\$745.00	\$74.50
02/12/25	John Soumilas	Emails w. FMS staff/attorneys re preparation of fee petition materials	0.30	\$745.00	\$223.50
02/12/25	John Soumilas	Emails re prep for motion for attorneys fees and costs	0.50	\$745.00	\$372.50
02/21/25	John Soumilas	Emails regarding fee petition material planning	0.50	\$745.00	\$372.50
02/24/25	John Soumilas	Emails regarding fee petition material planning	0.30	\$745.00	\$223.50
03/04/25	John Soumilas	Emails regarding fee petition material planning	0.30	\$745.00	\$223.50
John Soumilas Total:			413.5		\$308,057.50

Name: Jordan Sartell

12/11/18	Jordan Sartell	Participated in attorney meeting discussing possible claims and defenses, venue considerations, and case valuation, including class treatment.	0.90	\$445.00	\$400.50
12/12/18	Jordan Sartell	confer w/JAF, GB re pleadings, timelines for filing	0.20	\$445.00	\$89.00
12/13/18	Jordan Sartell	review correspondence among co-counsel; confer re venue, claims, other complaint-related considerations; review client documents	0.80	\$445.00	\$356.00
01/07/19	Jordan Sartell	review, revise near final draft of complaint	1.10	\$445.00	\$489.50
01/08/19	Jordan Sartell	confer w/JS, CC re revisions to latest draft complaint	0.30	\$445.00	\$133.50
02/21/19	Jordan Sartell	review ECF 14, 15, calendaring discovery dates, motion deadlines	0.30	\$445.00	\$133.50
02/26/19	Jordan Sartell	calendar dates for class discovery, MCC; review outline of 26(f) conference; review drafts of stipulated protective order and ESI stip; confer w/CC re same	1.10	\$445.00	\$489.50
03/31/19	Jordan Sartell	confer w/JAF re Def's motion to stay, distribution of labor re same among CC firms	0.20	\$445.00	\$89.00
04/01/19	Jordan Sartell	confer w/JK re draft of Pl's initial disclosures; confer w/CC re same	1.60	\$445.00	\$712.00
04/03/19	Jordan Sartell	confer w/co-counsel re response to motion to stay, case scheduling, initial disclosures	0.70	\$445.00	\$311.50

Date	Timekeeper	Narrative	Units	Rate	Value
04/07/19	Jordan Sartell	confer w/co-counsel re brief in opposition to motion to stay	0.20	\$445.00	\$89.00
04/28/19	Jordan Sartell	confer w/CC re written discovery and 7/3 deadline for class issues	0.20	\$445.00	\$89.00
04/29/19	Jordan Sartell	prepare initial draft of written discovery	2.30	\$445.00	\$1,023.50
05/01/19	Jordan Sartell	review, revise draft written discovery, send to co-counsel for feedback	3.70	\$445.00	\$1,646.50
05/02/19	Jordan Sartell	review updated drafts of written discovery from co-counsel; note service of same on Def	0.30	\$445.00	\$133.50
05/08/19	Jordan Sartell	confer w/JS re written discovery requests to Def	0.10	\$445.00	\$44.50
06/02/19	Jordan Sartell	review ECF 43 setting new case management and discovery deadlines; calendar same and review status of discovery requests	0.10	\$445.00	\$44.50
06/17/19	Jordan Sartell	review M&C correspondence for OC in advance of tomorrow s M&C call	0.20	\$445.00	\$89.00
06/18/19	Jordan Sartell	participate in M&C conference call w/OC and CC re Def's responses to Pl's first discovery requests; caucus w/CC re same	0.90	\$445.00	\$400.50
06/19/19	Jordan Sartell	confer w/CC Jennifer Murray re f/u correspondence to yesterday s M&C, proposed compromises	0.30	\$445.00	\$133.50
08/27/19	Jordan Sartell	confer in firm w/JAF re upcoming depositions in WI, MN; review travel options	0.40	\$445.00	\$178.00
08/28/19	Jordan Sartell	finalize travel arrangements; confer w/JAF re prep for Fraizer depo, 30(b)(6) topics	0.60	\$445.00	\$267.00
09/01/19	Jordan Sartell	review Def's 2d production of documents and related correspondence among co-counsel, including doc index; review def's discovery to plaintiff, begin preparing responses to same	2.10	\$445.00	\$934.50
09/02/19	Jordan Sartell	finalize 30(b)(6) notice	2.90	\$445.00	\$1,290.50
09/03/19	Jordan Sartell	prep for Frazier deposition	2.10	\$445.00	\$934.50
09/04/19	Jordan Sartell	confer w/JAF, co-counsel JM re tomorrow s deposition; continue document review and prep for same	5.50	\$445.00	\$2,447.50
09/04/19	Jordan Sartell	travel from San Francisco to Green Bay for Fraizer deposition	10.00	\$445.00	\$4,450.00
09/05/19	Jordan Sartell	email w/CC JRM re calling data for deposition	0.40	\$445.00	\$178.00
09/06/19	Jordan Sartell	attend deposition of Adam Frazier in GB, WI	6.00	\$445.00	\$2,670.00
09/06/19	Jordan Sartell	final prep for, debrief of Frazier deposition w/JAF; return travel	6.00	\$445.00	\$2,670.00
09/08/19	Jordan Sartell	prepare post-deposition memorandum for JAF, co-counsel re Frazier dep and add'l discovery needed; confer among co-counsel re same	1.80	\$445.00	\$801.00
09/08/19	Jordan Sartell	confer w/ OC re extension to respond to discovery to Pl	0.20	\$445.00	\$89.00
09/09/19	Jordan Sartell	confer in firm re upcoming deposition of J.J. in MN	0.40	\$445.00	\$178.00
09/09/19	Jordan Sartell	confer among co-counsel re upcoming M&C w/OC	0.40	\$445.00	\$178.00
09/10/19	Jordan Sartell	participate in M&C conference w/CC, OC	0.70	\$445.00	\$311.50
09/10/19	Jordan Sartell	review client documents; confer in firm w/GHB re initial intake notes, w/CC JM re other documents	0.70	\$445.00	\$311.50
09/11/19	Jordan Sartell	review written discovery to plaintiff; confer w/Cl re certain interrogatories, RsPD; review CL docs; confer w/CC re subpoenas to 3d party cellular carrier	0.70	\$445.00	\$311.50

Date	Timekeeper	Narrative	Units	Rate	Value
09/11/19	Jordan Sartell	review correspondence among counsel resetting depositions and contemplating extension of case mgmt schedule	0.40	\$445.00	\$178.00
09/15/19	Jordan Sartell	review, revise draft responses to Def's written discovery; confer w/CL re time to discuss same	0.50	\$445.00	\$222.50
09/16/19	Jordan Sartell	confer w/CL re Def's written discovery requests; confer in firm and w/CC re same	1.70	\$445.00	\$756.50
09/16/19	Jordan Sartell	confer w/JS and potential expert witness G.C. re case	0.10	\$445.00	\$44.50
09/16/19	Jordan Sartell	confer w/CC re status of discovery assignments	0.60	\$445.00	\$267.00
09/18/19	Jordan Sartell	review, revise Pl's objections & responses to Def's written discovery requests	1.30	\$445.00	\$578.50
09/19/19	Jordan Sartell	review, revise Pl's objections & responses to Def's written discovery requests	1.20	\$445.00	\$534.00
09/22/19	Jordan Sartell	review, revise complaint in light of information from client; confer in firm, w/CC re same	0.40	\$445.00	\$178.00
09/24/19	Jordan Sartell	review, finalize Pl's responses to written discovery; coordinate service of same w/CC	1.40	\$445.00	\$623.00
09/24/19	Jordan Sartell	draft add'l RSPD for Def; confer re same w/CC	1.70	\$445.00	\$756.50
09/24/19	Jordan Sartell	revise factual allegations for amended complaint	0.50	\$445.00	\$222.50
09/30/19	Jordan Sartell	confer w/CC re status of discovery, newly uncovered facts	0.90	\$445.00	\$400.50
09/30/19	Jordan Sartell	review additional docs, recordings; confer w/JAF, JM re same; prep relevant 30(b)(1) notice	0.80	\$445.00	\$356.00
10/02/19	Jordan Sartell	continue to revise complaint per CC strategy meeting	1.40	\$445.00	\$623.00
10/02/19	Jordan Sartell	confer w/CC re discovery strategy	0.20	\$445.00	\$89.00
10/06/19	Jordan Sartell	revise complaint per JRM feedback	0.70	\$445.00	\$311.50
10/07/19	Jordan Sartell	confer w/CC re logistics for remaining depositions of Def personnel	0.20	\$445.00	\$89.00
10/08/19	Jordan Sartell	confer w/CR re outstanding invoices to experts	0.20	\$445.00	\$89.00
10/09/19	Jordan Sartell	confer w/CC re add'l RPDs to serve	0.30	\$445.00	\$133.50
10/15/19	Jordan Sartell	confer w/CC re upcoming depositions, coverage of same; discovery strategy and outstanding written discovery requests in prep for OC M&C tomorrow	0.60	\$445.00	\$267.00
10/16/19	Jordan Sartell	confer w/CC re 30b1 notice of UHC rep who spoke w/Pl in call recording; confer w/CC re dialer data analysis in advance of call w/OC; confer w/JS re upcoming deposition on 10/25, prep for same	0.80	\$445.00	\$356.00
10/16/19	Jordan Sartell	confer w/CC re add'l RSPD to UHC for complaint data/docs; revise and serve same	1.00	\$445.00	\$445.00
10/16/19	Jordan Sartell	join M&C conference w/CC and OC discussing 30(b)(6) topics, written discovery, fact witness depositions	0.90	\$445.00	\$400.50
10/27/19	Jordan Sartell	review JS notes from Jeanette depo on 10/25	0.20	\$445.00	\$89.00
10/31/19	Jordan Sartell	confer w/CC re upcoming depositions, outstanding discovery issues	0.70	\$445.00	\$311.50
11/03/19	Jordan Sartell	confer w/JAF re upcoming technical deposition on 11/7	0.20	\$445.00	\$89.00
11/04/19	Jordan Sartell	prepare depo outline for JAF of Sarah Paluczak	0.10	\$445.00	\$44.50
11/05/19	Jordan Sartell	prepare exhibits, lines of questioning, for depo of Sarah Paluczak; confer w/CC JRM re same; confer w/JAF re same	4.30	\$445.00	\$1,913.50

Date	Timekeeper	Narrative	Units	Rate	Value
11/06/19	Jordan Sartell	confer w/JAF re prep and exhibits for Sarah Paluczak deposition; sit in same; confer w/JAF re same	4.40	\$445.00	\$1,958.00
11/06/19	Jordan Sartell	confer w/JAF re depo outline, exhibits for McGavick	1.50	\$445.00	\$667.50
11/07/19	Jordan Sartell	confer w/JAF re outline, exhibits for McGavick Depo; sit in on same	4.40	\$445.00	\$1,958.00
11/08/19	Jordan Sartell	review email chain w/calculations of total actionable calls discerned from def's data; correspond w/CC re same	0.40	\$445.00	\$178.00
11/11/19	Jordan Sartell	review correspondence among counsel re 11th hour data production on eve of expert report deadline	0.20	\$445.00	\$89.00
11/17/19	Jordan Sartell	confer w/co-counsel	0.30	\$445.00	\$133.50
11/17/19	Jordan Sartell	participate in M&C call w/OC re outstanding discovery issues, esp. data from add l calling teams	0.90	\$445.00	\$400.50
11/18/19	Jordan Sartell	review, revise 30(b)(6) notice upon conferral w/co-counsel	0.10	\$445.00	\$44.50
12/02/19	Jordan Sartell	confer w/CC re potential fact witness who spoke w/plaintiff in recorded call	0.20	\$445.00	\$89.00
12/08/19	Jordan Sartell	review correspondence among co-counsel re add l unwanted telephone call from Def to Pl	0.20	\$445.00	\$89.00
12/29/19	Jordan Sartell	review latest set of written discovery to plaintiff	0.30	\$445.00	\$133.50
01/08/20	Jordan Sartell	confer in firm w/RTB re latest class figures	0.10	\$445.00	\$44.50
01/15/20	Jordan Sartell	conference call among Pl's counsel re mediation strategy	0.40	\$445.00	\$178.00
01/26/20	Jordan Sartell	pre-mediation call w/Pl's counsel	0.30	\$445.00	\$133.50
02/11/20	Jordan Sartell	confer w/JS re mediation, additional research and investigation of UHC; confer w/JK re same	0.40	\$445.00	\$178.00
12/27/22	Jordan Sartell	confer w/CC re renewed motion for class certification; order lifting stay	1.00	\$445.00	\$445.00
12/29/22	Jordan Sartell	review latest discovery responses for amended MCC	1.50	\$445.00	\$667.50
01/01/23	Jordan Sartell	continue review of discovery responses, documents produced to date	2.90	\$445.00	\$1,290.50
01/01/23	Jordan Sartell	draft R 26(e) supplementation request letter to OC	0.80	\$445.00	\$356.00
01/02/23	Jordan Sartell	review evidentiary record in support of MCC for potential supplementation needs from Def	3.20	\$445.00	\$1,424.00
01/04/23	Jordan Sartell	draft additional discovery requests; confer w/CC re same	0.80	\$445.00	\$356.00
03/08/23	Jordan Sartell	confer among counsel re draft JSR, discovery requirements	0.50	\$445.00	\$222.50
06/08/23	Jordan Sartell	confer w/CC re posture of case vis a vis settlement prospects	0.30	\$445.00	\$133.50
06/20/23	Jordan Sartell	confer w/CC re upcoming hearing on MCC, strategy re same and potential for settlement	0.80	\$445.00	\$356.00
06/21/23	Jordan Sartell	confer w/CC re settlement demand/case posture	0.60	\$445.00	\$267.00
08/10/23	Jordan Sartell	attend mediation w/Lou Peterson	7.00	\$445.00	\$3,115.00
10/06/23	Jordan Sartell	legal research re burden of proof at class cert; confer w/JS re same	1.00	\$445.00	\$445.00
10/17/23	Jordan Sartell	review correspondence among counsel re class notice	0.20	\$445.00	\$89.00
10/18/23	Jordan Sartell	draft email, postcard, long-form notices for conferral w/co-counsel	4.00	\$445.00	\$1,780.00
10/18/23	Jordan Sartell	circulate draft notices to CC via email	0.10	\$445.00	\$44.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/19/23	Jordan Sartell	review correspondence among counsel re class notice	0.40	\$445.00	\$178.00
10/20/23	Jordan Sartell	review correspondence among counsel re class notice	0.40	\$445.00	\$178.00
10/23/23	Jordan Sartell	meet and confer among counsel re class notice	1.00	\$445.00	\$445.00
01/04/24	Jordan Sartell	attend meet and confer re status report, 3d party discovery, production of call records and transcripts	1.00	\$445.00	\$445.00
02/16/24	Jordan Sartell	draft email re UHC production	0.10	\$445.00	\$44.50
02/20/24	Jordan Sartell	confer among CC re def's recent production, disclosure of add'l witnesses	0.80	\$445.00	\$356.00
03/19/24	Jordan Sartell	confer w/CC re def's production of call recordings, records	0.80	\$445.00	\$356.00
03/22/24	Jordan Sartell	confer w/CC re review of call recordings produced in discovery (.8); confer re new witnesses, case status and responses to subpoenas	1.40	\$445.00	\$623.00
04/03/24	Jordan Sartell	discuss draft JSR, plan for discovery from undisclosed call agents w/CC	0.50	\$445.00	\$222.50
05/13/24	Jordan Sartell	review avaya calling data in prep for Paluczak deposition	2.70	\$445.00	\$1,201.50
05/13/24	Jordan Sartell	draft email to JAF re dep prep	0.20	\$445.00	\$89.00
05/14/24	Jordan Sartell	confer w/CC JM re review of avaya data in prep for Paluczak deposition	0.20	\$445.00	\$89.00
05/14/24	Jordan Sartell	continue review avaya calling data in prep for Paluczak deposition	2.80	\$445.00	\$1,246.00
05/15/24	Jordan Sartell	confer w/JAF re review of avaya data in prep for Paluczak deposition	0.60	\$445.00	\$267.00
05/15/24	Jordan Sartell	confer w/CC JM re review of avaya data in prep for Paluczak deposition	0.50	\$445.00	\$222.50
05/15/24	Jordan Sartell	assembly of potential exhibits for JAF depo of Paluczak	0.60	\$445.00	\$267.00
05/15/24	Jordan Sartell	draft email to JAF re Deposition Preparation of Sarah Paluczak	0.20	\$445.00	\$89.00
05/16/24	Jordan Sartell	v/c w/CC re implications of Paluczak declaration on class composition	0.70	\$445.00	\$311.50
06/12/24	Jordan Sartell	confer w/CC re Def's recent call recording production, class population	0.60	\$445.00	\$267.00
06/25/24	Jordan Sartell	confer w/CC re Def's recent call recording production, class population	0.90	\$445.00	\$400.50
07/10/24	Jordan Sartell	confer w/CC re upcoming depositions, status of call recording review and transcription	1.20	\$445.00	\$534.00
07/12/24	Jordan Sartell	confer w/CC re upcoming depositions, status of call recording review and transcription	0.30	\$445.00	\$133.50
07/15/24	Jordan Sartell	draft email to JAF re receipt of class list	0.20	\$445.00	\$89.00
07/26/24	Jordan Sartell	confer w/CC re Def's motion to decertify class, arguments in response	1.30	\$445.00	\$578.50
07/29/24	Jordan Sartell	confer w/CC re discovery strategy vis a vis motion to decertify	0.70	\$445.00	\$311.50
07/31/24	Jordan Sartell	confer w/CC J.M. re analysis of data for expert matching	0.20	\$445.00	\$89.00
08/02/24	Jordan Sartell	review waterfall spreadsheet of data for expert matching, class membership; confer w/CC JM re same	1.20	\$445.00	\$534.00
08/05/24	Jordan Sartell	confer w/OC re Decert briefing, discovery disputes, depositions	1.10	\$445.00	\$489.50
08/06/24	Jordan Sartell	confer w/CC re upcoming depositions, response to Def's mot. to decert	0.50	\$445.00	\$222.50
08/13/24	Jordan Sartell	confer w/CC re expert discovery, opposition to decert motion	0.70	\$445.00	\$311.50
08/20/24	Jordan Sartell	confer w/co-counsel JM re audio exhibits for upcoming depositions	0.40	\$445.00	\$178.00
08/21/24	Jordan Sartell	confer w/co-counsel re upcoming depositions, opposition to de-cert motion	0.70	\$445.00	\$311.50

Date	Timekeeper	Narrative	Units	Rate	Value
08/23/24	Jordan Sartell	confer among co-counsel re ascertainability methodology	0.40	\$445.00	\$178.00
08/26/24	Jordan Sartell	prep for deposition of Shimek: assemble, review exhibits; confer w/JAF re same; attend M&C videoconferre w/OC re same	3.60	\$445.00	\$1,602.00
08/27/24	Jordan Sartell	prep for deposition of Janzig; confer in firm w/JAF re same	0.40	\$445.00	\$178.00
08/27/24	Jordan Sartell	confer w/CC re yesterday's M&C, upcoming depositions, decertification opposition	0.50	\$445.00	\$222.50
08/28/24	Jordan Sartell	prep for deposition of Janzig; confer in firm w/JAF re same	3.20	\$445.00	\$1,424.00
08/29/24	Jordan Sartell	assist w/exhibits, prep for Janzig depo	0.50	\$445.00	\$222.50
08/30/24	Jordan Sartell	confer w/JAF re prep for Bowdish deposition	0.90	\$445.00	\$400.50
09/03/24	Jordan Sartell	assist w/exhibits, prep for Puchi depo; confer w/CC re same	2.40	\$445.00	\$1,068.00
09/04/24	Jordan Sartell	Email from JMS to Jennifer Murray requesting Janzig rough	0.10	\$445.00	\$44.50
09/10/24	Jordan Sartell	confer w/co-counsel re expert analysis of class member data	0.80	\$445.00	\$356.00
09/17/24	Jordan Sartell	confer among class counsel re latest expert data analysis	0.60	\$445.00	\$267.00
09/17/24	Jordan Sartell	attend meet and conferral call w/OC re recent requests to depose class counsel paralegal, administrator	0.50	\$445.00	\$222.50
09/24/24	Jordan Sartell	confer w/CC re latest discovery disputes, affirmative expert discovery	1.00	\$445.00	\$445.00
10/01/24	Jordan Sartell	confer w/CC re outstanding discovery, proposed stipulations re certain 3d parties	0.60	\$445.00	\$267.00
10/01/24	Jordan Sartell	attend meet and conferral call w/OC re stipulations to avoid deposition of class counsel paralegal, administrator	1.20	\$445.00	\$534.00
10/04/24	Jordan Sartell	confer w/CC re latest expert work; in firm w/MW re prepping subpoena for def's expert	1.00	\$445.00	\$445.00
10/07/24	Jordan Sartell	confer in firm w/JAF re upcoming depositions; in firm w/MW re subpoena to Def expert Russo	0.70	\$445.00	\$311.50
10/08/24	Jordan Sartell	confer w/CC re upcoming deposition of PacificEast, Pl expert AV	0.70	\$445.00	\$311.50
10/09/24	Jordan Sartell	confer among co-counsel and with expert AV re declaration; review, revise subsequent drafts	1.20	\$445.00	\$534.00
10/11/24	Jordan Sartell	confer among co-counsel and with expert AV re declaration; review, revise subsequent drafts	1.20	\$445.00	\$534.00
10/14/24	Jordan Sartell	confer w/CC J.M. re deposition of Pl's expert A.V.	0.40	\$445.00	\$178.00
10/15/24	Jordan Sartell	participate in deposition preparation session of Pl's expert A.V.	4.90	\$445.00	\$2,180.50
10/15/24	Jordan Sartell	confer w/CC re upcoming expert deposition, related subpoena responses, document productions	0.60	\$445.00	\$267.00
10/16/24	Jordan Sartell	attend deposition of Pl expert Anya Verkhovskaya	3.30	\$445.00	\$1,468.50
10/18/24	Jordan Sartell	confer w/CC re 30(b)(6) topics, upcoming M&C w/OC re same	0.30	\$445.00	\$133.50
10/28/24	Jordan Sartell	confer w/CC re Def's latest settlement overtures	0.50	\$445.00	\$222.50
10/29/24	Jordan Sartell	confer w/CC re counteroffer to Def's latest settlement overture; deposition	0.30	\$445.00	\$133.50
10/31/24	Jordan Sartell	review correspondence among counsel re settlement	0.30	\$445.00	\$133.50

Date	Timekeeper	Narrative	Units	Rate	Value
11/05/24	Jordan Sartell	confer among co-counsel re preparing for preliminary approval	0.40	\$445.00	\$178.00
11/19/24	Jordan Sartell	confer among co-counsel re various bids for notice and admin, selection of settlement administrator	0.30	\$445.00	\$133.50
11/25/24	Jordan Sartell	confer w/CC re addl bid for notice/admin from Simpluris	0.50	\$445.00	\$222.50
02/13/25	Jordan Sartell	confer in firm w/LKWB, JAF, MW re marshaling, review of time records	0.20	\$445.00	\$89.00
Jordan Sartell Total:			176.9		\$78,720.50

Name:	Lauren Brennan				
12/11/18	Lauren Brennan	Participated in attorney meeting discussing possible claims and defenses, venue considerations, and case valuation, including class treatment.	0.90	\$470.00	\$423.00
12/13/18	Lauren Brennan	Confer with JMS re: fact investigation.	0.10	\$470.00	\$47.00
12/16/18	Lauren Brennan	Confer with JMS re: fact investigation and review of documents.	0.10	\$470.00	\$47.00
02/20/19	Lauren Brennan	Correspondence re: strategy for written discovery.	0.20	\$470.00	\$94.00
02/26/19	Lauren Brennan	Correspondence with co-counsel re: 26f conference.	0.10	\$470.00	\$47.00
03/31/19	Lauren Brennan	Confer with JMS and JS re: opp to motion to stay.	0.20	\$470.00	\$94.00
05/19/19	Lauren Brennan	Reviewed order denying motion to stay; correspondence with co-counsel re: same.	0.40	\$470.00	\$188.00
06/04/19	Lauren Brennan	Correspondence re: settlement discussions.	0.30	\$470.00	\$141.00
06/19/19	Lauren Brennan	Correspondence re: discovery meet and confer.	0.20	\$470.00	\$94.00
07/09/19	Lauren Brennan	Confer with JAF re: settlement status.	0.10	\$470.00	\$47.00
07/31/19	Lauren Brennan	Correspondence re: depositions.	0.20	\$470.00	\$94.00
10/13/19	Lauren Brennan	Confer with JS re: deposition prep.	0.20	\$470.00	\$94.00
11/11/19	Lauren Brennan	Confer re: strategy and potential class size.	0.10	\$470.00	\$47.00
12/03/19	Lauren Brennan	Confer in firm re: settlement prospects and strategy.	0.10	\$470.00	\$47.00
01/09/20	Lauren Brennan	Confer in-firm re: mediation	0.10	\$470.00	\$47.00
02/16/20	Lauren Brennan	Confer with JS re: case strategy and potential motion for interim appointment as class counsel, MCC strategy.	0.80	\$470.00	\$376.00
02/18/20	Lauren Brennan	Confer in-firm re strategy for MCC and case coordination	0.20	\$470.00	\$94.00
03/09/20	Lauren Brennan	Confer in-firm re: case status and litigation strategy.	0.10	\$470.00	\$47.00
06/09/20	Lauren Brennan	Participated in attorney meeting discussing case status and strategy.	0.10	\$470.00	\$47.00
06/16/20	Lauren Brennan	Conducted legal research re: certified class actions with similar theories.	1.70	\$470.00	\$799.00
07/14/20	Lauren Brennan	Participated in meeting re: workflow and litigation strategy issues.	0.10	\$470.00	\$47.00
08/28/22	Lauren Brennan	Participated in strategy call re motion to amend/reopen	0.70	\$470.00	\$329.00
08/30/22	Lauren Brennan	Correspondence re status report with court	0.10	\$470.00	\$47.00
09/05/22	Lauren Brennan	Participated in attorney meeting discussing case status and strategy	0.10	\$470.00	\$47.00
09/11/22	Lauren Brennan	Participated in call re strategy	0.30	\$470.00	\$141.00

Date	Timekeeper	Narrative	Units	Rate	Value
12/19/22	Lauren Brennan	Correspondence re lifting of stay	0.10	\$470.00	\$47.00
12/20/22	Lauren Brennan	Confer re order lifting stay and strategy going forward	0.20	\$470.00	\$94.00
01/22/23	Lauren Brennan	Confer re briefing on class cert/MTD	0.40	\$470.00	\$188.00
03/13/23	Lauren Brennan	Participated in attorney meeting discussing case status and strategy	0.10	\$470.00	\$47.00
07/31/23	Lauren Brennan	Participated in call re mediation strategy	0.10	\$470.00	\$47.00
08/11/23	Lauren Brennan	Correspondence re mediation	0.10	\$470.00	\$47.00
08/14/23	Lauren Brennan	Correspondence re settlement issues	0.20	\$470.00	\$94.00
08/21/23	Lauren Brennan	Confer re settlement issues	0.10	\$470.00	\$47.00
12/26/23	Lauren Brennan	Attorney meeting re case status and strategy	0.10	\$470.00	\$47.00
03/04/24	Lauren Brennan	Participated in attorney meeting discussing case status and strategy including MCC	0.10	\$470.00	\$47.00
05/20/24	Lauren Brennan	Participated in attorney meeting discussing case status and strategy	0.10	\$470.00	\$47.00
08/08/24	Lauren Brennan	Participated in team meeting re case status and strategy	0.10	\$470.00	\$47.00
09/16/24	Lauren Brennan	Participated in team call re expert discovery and deps	0.10	\$470.00	\$47.00
09/23/24	Lauren Brennan	Participated in team call re deps and discovery	0.20	\$470.00	\$94.00
01/17/25	Lauren Brennan	Correspondence re fee petition	0.10	\$470.00	\$47.00
Lauren Brennan Total:			9.60		\$4,512.00

Name: Mark Mailman

02/16/20	Mark Mailman	File review; conferring firm re: case strategy	2.20	\$840.00	\$1,848.00
Mark Mailman Total:			2.20		\$1,848.00

Name: Paralegal

12/09/18	Paralegal	Telephone conference with client re phone logs. Confer with GHB re same. Prepare journal.	0.60	\$345.00	\$207.00
12/13/18	Paralegal	Correspondence with co-counsel re client s documents.	0.20	\$345.00	\$69.00
12/17/18	Paralegal	Correspondence to co-counsel re telephone conference with client. Telephone conference with client re same. Confer with GHB re same.	0.50	\$345.00	\$172.50
02/07/19	Paralegal	Work on pro hac vice papers for JAF and JS; transmit to local counsel for finalizing and future filing.	1.60	\$345.00	\$552.00
02/20/19	Paralegal	Download Court s order; read and identify case deadlines contained therein; add and/or modify case deadlines to litigation calendar accordingly.	0.70	\$345.00	\$241.50
02/21/19	Paralegal	Analyze documents previously held by co-counsel; compare to documents held by F&M; advise that one group of documents was in addition to the documents prepared by co-counsel; send documents by email.	0.40	\$345.00	\$138.00
02/26/19	Paralegal	Download motions for pro hac vice; place on cloud storage for access by attorneys; download orders on same motions.	0.80	\$345.00	\$276.00

Date	Timekeeper	Narrative	Units	Rate	Value
02/28/19	Paralegal	Download Court's order; read and identify case deadlines contained therein; add and/or modify deadlines on litigation calendar accordingly.	0.70	\$345.00	\$241.50
03/28/19	Paralegal	Download defendant's Motion to Stay; research local rules regarding dates to respond; add deadlines to litigation calendar.	0.70	\$345.00	\$241.50
04/14/19	Paralegal	Download Defs' Reply Brief in support of Motion to Stay; upload to cloud storage for review by attorneys.	0.30	\$345.00	\$103.50
06/09/19	Paralegal	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.70	\$345.00	\$241.50
06/23/19	Paralegal	Download stipulated motion for protective order; place on cloud storage for review by attorneys.	0.30	\$345.00	\$103.50
06/24/19	Paralegal	Download protective order; place on cloud storage for review by attorneys.	0.30	\$345.00	\$103.50
09/18/19	Paralegal	Receive deposition transcript; place on cloud storage with exhibits for review by attorneys.	0.40	\$345.00	\$138.00
09/23/19	Paralegal	Move dates of upcoming depositions on litigation calendar, in accord with postponement of same; inform court reporter of postponements.	0.60	\$345.00	\$207.00
09/23/19	Paralegal	Download Stipulated motion for extension of time; add to cloud storage for review by attorneys.	0.40	\$345.00	\$138.00
09/24/19	Paralegal	Download Court's Order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.90	\$345.00	\$310.50
09/25/19	Paralegal	Download Court's order; read and identify case deadlines contained therein; add and/or modify case deadlines on litigation calendar accordingly.	0.50	\$345.00	\$172.50
09/26/19	Paralegal	Communications with court reporter re: upcoming depositions; correspondence with JAF re: same.	0.60	\$345.00	\$207.00
09/30/19	Paralegal	Downloading various pro hac vice motions, notices of appearance by attorneys appearing for Defendants, and orders granting pro hac vice motions.	0.60	\$345.00	\$207.00
10/01/19	Paralegal	Download deposition exhibits; provide transcript and exhibits to co-counsel; confer with JAF re: travel for upcoming deposition; inform court reporter, etc. when upcoming deposition was postponed.	1.40	\$345.00	\$483.00
10/02/19	Paralegal	Download and file to cloud storage Plaintiff's Request for Inspection, for review by attorneys.	0.40	\$345.00	\$138.00
10/08/19	Paralegal	Set up conference call with co-counsel	0.30	\$345.00	\$103.50
10/09/19	Paralegal	Confirm postponement of deposition with court reporting firm.	0.30	\$345.00	\$103.50
10/09/19	Paralegal	Add to litigation calendar a conference call re: a possible expert.	0.40	\$345.00	\$138.00
10/13/19	Paralegal	Confer with JS, JMS re: upcoming depositions in case.	0.60	\$345.00	\$207.00
10/14/19	Paralegal	Add new dates for depositions onto litigation calendar, begin making arrangements for court reporter for the various depositions. Start drafts of Notices of Deposition.	1.90	\$345.00	\$655.50

Date	Timekeeper	Narrative	Units	Rate	Value
10/15/19	Paralegal	Confer with JAF, JS, court reporter firm re: upcoming depositions in the case, coordination of logistics re: same.	0.90	\$345.00	\$310.50
10/15/19	Paralegal	Research travel logistics for Jeanette dep in Duluth, MN; email w/ J. Soumilas re same.	0.60	\$345.00	\$207.00
10/16/19	Paralegal	Download cases and printout for JAF; provide analysis of Def's arguments and how cases support same; provide analysis of case giving negative treatment re: same.	1.60	\$345.00	\$552.00
10/16/19	Paralegal	Prepare materials for review by JS in preparation for upcoming deposition; confer re: location, videoconference issues.	1.80	\$345.00	\$621.00
10/21/19	Paralegal	Confer with JS, correspondence with opposing counsel; draft Revised Notice of Deposition, and serve same.	0.90	\$345.00	\$310.50
10/22/19	Paralegal	Finalize and serve revised notice of deposition; address concerns regarding videoconference connection; analysis for attorney re: letter outlining witness s coverage of topics in 30b6 deposition notice.	3.70	\$345.00	\$1,276.50
10/23/19	Paralegal	Preparation for deposition; download document production; document review; analysis of issues in case, application to documents for use at deposition; address issues of video connection in preparation for same.	6.20	\$345.00	\$2,139.00
10/24/19	Paralegal	Address technical issues with videoconference connection; research on earlier deposition testimony to provide to attorney for post-deposition strategy communications with co-counsel team	1.70	\$345.00	\$586.50
10/29/19	Paralegal	Continue arrangements for upcoming depositions; inquiries, correspondence re expedited delivery of transcript of previous deposition; confer with JS, co-counsel re same.	1.40	\$345.00	\$483.00
10/29/19	Paralegal	Monitor emails among counsel in inst. case and counsel in another case; arrange teleconference in accordance with instructions.	0.30	\$345.00	\$103.50
10/31/19	Paralegal	Download transcript of previous deposition; confer with co-counsel re: arrangements, technological issues for upcoming depositions; assist in gathering exhibits and arranging for exhibits at deposition location.	3.40	\$345.00	\$1,173.00
11/03/19	Paralegal	Assist co-counsel with exhibits for deposition; address technical issues for videoconference deposition.	1.90	\$345.00	\$655.50
11/04/19	Paralegal	Address technical issues of videoconference to facilitate deposition.	0.60	\$345.00	\$207.00
11/04/19	Paralegal	Download documents produced by defendant; place on cloud storage for review by attorneys.	0.40	\$345.00	\$138.00
11/05/19	Paralegal	Confer with co-counsel, court reporter re: rough version of prior deposition; confer with court reporter, office staff re: videoconference setup for the next deposition; assist with document selection and prepare and ship documents for use at deposition on 11/7.	3.10	\$345.00	\$1,069.50

Date	Timekeeper	Narrative	Units	Rate	Value
11/06/19	Paralegal	Assist with videoconference connection problems for 11/7 deposition; assist with gathering of documents for 11/8 deposition, production of sets of documents to ship to site of 11/8 deposition; confer with vendors re: videoconference setup for 11/8 deposition.	3.90	\$345.00	\$1,345.50
11/07/19	Paralegal	Assist with videoconference connection to enable deposition; confer with vendor re same.	0.70	\$345.00	\$241.50
11/10/19	Paralegal	Research, draft and transfer motion for pro hac vice admission of JMS to local counsel.	1.60	\$345.00	\$552.00
11/13/19	Paralegal	Download Defendant s additional document production; review same and add to cloud storage for review by attorneys; download Plaintiff s expert report and exhibits, place on cloud storage for review by attorneys.	0.50	\$345.00	\$172.50
11/17/19	Paralegal	Add deposition transcript to cloud storage; confer with co-counsel re same.	0.30	\$345.00	\$103.50
11/19/19	Paralegal	Download and review deposition transcript, upload documents to cloud storage for review by attorneys.	0.30	\$345.00	\$103.50
11/24/19	Paralegal	Download, review, and place on cloud storage Plaintiff s discovery responses, including documents relied upon by experts.	0.40	\$345.00	\$138.00
11/25/19	Paralegal	Research status of pro hac vice motion for JMS; reminder communication to co-counsel re same.	0.30	\$345.00	\$103.50
12/09/19	Paralegal	Download and review further Plaintiff s document production; place on cloud storage for review by attorneys.	0.40	\$345.00	\$138.00
12/12/19	Paralegal	Download, review and analyze Defendant s 3rd set of Requests for Production; add deadline to litigation calendar.	0.40	\$345.00	\$138.00
12/15/19	Paralegal	Download, review and analyze Defendant s interrogatories (3rd set) and requests for production (4th set).	0.30	\$345.00	\$103.50
01/06/20	Paralegal	Meet and confer w/ J. Soumilas re prep for mediation.	0.10	\$345.00	\$34.50
01/09/20	Paralegal	Analysis of communication from mediator in case; confer with JS, LKWB re: same.	0.50	\$345.00	\$172.50
01/14/20	Paralegal	Share transcripts of prior depositions and exhibits thereto with co-counsel.	0.40	\$345.00	\$138.00
01/16/20	Paralegal	Download and analysis of Mediator s information.	0.20	\$345.00	\$69.00
01/26/20	Paralegal	Analysis of Court s order	0.40	\$345.00	\$138.00
01/26/20	Paralegal	Prepare for upcoming mediation; emails w/ J. Soumilas re same.	1.10	\$345.00	\$379.50
01/30/20	Paralegal	Meet and confer w/ J. Soumilas and J. Kabacinski re mediation statement.	0.10	\$345.00	\$34.50
02/02/20	Paralegal	Review class size info; call w/ J. Sartell re same.	0.20	\$345.00	\$69.00
02/03/20	Paralegal	Meet and confer w/ J. Soumilas and J. Kabacinski re mediation prep.	0.10	\$345.00	\$34.50
02/04/20	Paralegal	Meet and confer w/ J. Kabacinski and J. Soumilas re strategy and prep for mediation.	0.10	\$345.00	\$34.50
02/05/20	Paralegal	Review ECF re notice of withdrawal of K. Hartnett.	0.10	\$345.00	\$34.50
02/06/20	Paralegal	Preparation of binders of case materials for attorneys attending mediation.	3.30	\$345.00	\$1,138.50
02/09/20	Paralegal	Preparation of binders of case materials for attorneys attending mediation.	0.80	\$345.00	\$276.00
02/10/20	Paralegal	Prep for mediation; confer w/ J. Soumilas re travel logistics.	0.30	\$345.00	\$103.50

Date	Timekeeper	Narrative	Units	Rate	Value
02/11/20	Paralegal	Search publicly available documents for complaints by consumers about phone calls from UHC.	2.60	\$345.00	\$897.00
02/11/20	Paralegal	Correspondence to acquire deposition transcript of client Frantz Samson.	0.40	\$345.00	\$138.00
02/18/20	Paralegal	Meet and confer w/ J. Soumilas, J. Sartell, J. Kabacinski and L. Brennan re post mediation strategy.	0.10	\$345.00	\$34.50
03/08/20	Paralegal	Address issues of remote deposition of Defense expert; draft and issue Revised Notice of Deposition re: same.	1.90	\$345.00	\$655.50
03/12/20	Paralegal	Review ECF re stip and proposed order to extend case deadlines.	0.10	\$345.00	\$34.50
03/23/20	Paralegal	Meet and confer w/ J. Soumilas, J. Francis and J. Kabacinski re extension of time to file motion to certify class.	0.10	\$345.00	\$34.50
03/26/20	Paralegal	Download and analysis of Court s order.	0.40	\$345.00	\$138.00
04/05/20	Paralegal	Review ECF re Stip and proposed order extending case deadlines.	0.10	\$345.00	\$34.50
04/06/20	Paralegal	Confer with co-counsel; draft revised deposition notice; consider arrangements for videoconference deposition with all parties remote.	1.70	\$345.00	\$586.50
04/06/20	Paralegal	Review order denying parties request to extend case management deadlines.	0.10	\$345.00	\$34.50
04/07/20	Paralegal	Continued discussion on logistics of remote deposition, postponement of same.	0.90	\$345.00	\$310.50
04/07/20	Paralegal	Emails w/ J. Kabacinski and court reporter re cancellation of S. Kwon dep.; call w/ J. Francis, L. Brennan and J. Kabacinski re strategy for conducting remote deps.	0.30	\$345.00	\$103.50
04/08/20	Paralegal	Download Defendant s motion to stay; analysis of same; research local rules.	0.40	\$345.00	\$138.00
04/09/20	Paralegal	Review ECF motion to stay case.	0.10	\$345.00	\$34.50
04/12/20	Paralegal	Download Court s order; analysis re same.	0.30	\$345.00	\$103.50
04/12/20	Paralegal	Review ECF re motion for leave to file amended class action complaint.	0.10	\$345.00	\$34.50
04/13/20	Paralegal	Discussion with co-counsel re: logistics of remote deposition; research, preparation of documents for JAF.	1.40	\$345.00	\$483.00
04/14/20	Paralegal	Correspondence re: logistics of remote deposition; further research on deponent, correspondence with JAF, co-counsel re: same.	1.30	\$345.00	\$448.50
04/14/20	Paralegal	Review ECF re amended complaint.	0.10	\$345.00	\$34.50
04/16/20	Paralegal	Finalize research; correspondence re logistics of remote deposition; draft, finalize and serve revised notice of deposition.	2.70	\$345.00	\$931.50
04/19/20	Paralegal	Further correspondence, logistics details regarding Kwon deposition; delivery of documents to JAF.	1.90	\$345.00	\$655.50
04/20/20	Paralegal	Further correspondence regarding HIPAA compliance of court reporting firm; correspondence with co-counsel re logistics.	1.20	\$345.00	\$414.00
04/21/20	Paralegal	Correspondence with JAF, deposition vendors re: logistics, security, HIPAA concerns regarding deposition; gather documents for deposition, finalize availability.	4.60	\$345.00	\$1,587.00

Date	Timekeeper	Narrative	Units	Rate	Value
04/21/20	Paralegal	Confer w/ J. Kabacinski re prep for Kwon dep.	0.20	\$345.00	\$69.00
04/21/20	Paralegal	Review ECF re stipulated motion re Defendant United Healthcare Services Response to Amended Class Action Complaint.	0.10	\$345.00	\$34.50
04/22/20	Paralegal	Final preparation of exhibits to deposition; correspondence with court reporter in preparation; attend videoconference deposition and control display of documents during same.	5.20	\$345.00	\$1,794.00
04/23/20	Paralegal	Download rough transcript, distribute to JAF, multiple co-counsel; correspondence re: same.	0.40	\$345.00	\$138.00
04/23/20	Paralegal	Review ECF re Order on Stipulated Motion re Defendant s Response to Amended Class Action Complaint.	0.10	\$345.00	\$34.50
04/26/20	Paralegal	Download Court s order; analysis re: same.	0.40	\$345.00	\$138.00
04/26/20	Paralegal	Research for Notices of Depositions for Plaintiffs experts.	0.50	\$345.00	\$172.50
04/26/20	Paralegal	Review ECF re pl s response to motion to stay.	0.10	\$345.00	\$34.50
04/27/20	Paralegal	Review correspondence; analysis of same for scheduling of depositions.	0.30	\$345.00	\$103.50
05/04/20	Paralegal	Download Notice of Deposition of expert; analysis re: same.	0.30	\$345.00	\$103.50
05/04/20	Paralegal	Meet and confer w/ J. Soumilas and J. Kabacinski re filing Pl s motion for class cert.	0.10	\$345.00	\$34.50
05/04/20	Paralegal	Review ECF re Pritt Declaration ISO Motion to Stay.	0.10	\$345.00	\$34.50
05/07/20	Paralegal	Edit, format, finalize Declaration of James Francis, Firm Bio, for inclusion with motion for class certification.	2.70	\$345.00	\$931.50
05/10/20	Paralegal	Review ECF re Pls motion for class cert.	0.10	\$345.00	\$34.50
05/13/20	Paralegal	Assist co-counsel with written discovery responses.	0.60	\$345.00	\$207.00
05/14/20	Paralegal	Download, format, finalize mediation supplemental statement.	0.80	\$345.00	\$276.00
05/17/20	Paralegal	Review ECF re notice of supplemental authority in connection with motion to stay.	0.10	\$345.00	\$34.50
06/14/20	Paralegal	Intake invoice of expert Sonya Kwon, handle for processing.	0.30	\$345.00	\$103.50
06/16/20	Paralegal	Gather unredacted versions of expert reports.	0.30	\$345.00	\$103.50
06/18/20	Paralegal	Communication with co-counsel re recent filings; download same.	0.30	\$345.00	\$103.50
06/28/20	Paralegal	Correspondence with local counsel re: sur-reply brief on motion to certify class.	0.60	\$345.00	\$207.00
07/05/20	Paralegal	Review filing of supplemental authority	0.20	\$345.00	\$69.00
07/14/20	Paralegal	Meet and confer w/ J. Francis, J. Soumilas and D. Searles re case stay and Matlock.	0.20	\$345.00	\$69.00
10/06/20	Paralegal	Confer in-firm re case strategy.	0.10	\$345.00	\$34.50
04/06/21	Paralegal	Confer in-firm re case strategy.	0.10	\$345.00	\$34.50
12/12/22	Paralegal	Confer in-firm re case strategy and next steps.	0.10	\$345.00	\$34.50
01/18/23	Paralegal	Confer in-firm re adequacy declaration iso renewed MCC.	0.30	\$345.00	\$103.50
01/18/23	Paralegal	Review draft adequacy declaration iso renewed MCC.	0.30	\$345.00	\$103.50
01/23/23	Paralegal	Confer in-firm re briefing on MCC and next steps.	0.10	\$345.00	\$34.50
02/21/23	Paralegal	Confer in-firm re case strategy.	0.10	\$345.00	\$34.50

Date	Timekeeper	Narrative	Units	Rate	Value
03/13/23	Paralegal	Confer in-firm re case strategy post m&c w/ d s counsel on expansion of class.	0.30	\$345.00	\$103.50
05/08/23	Paralegal	Confer in-firm re class cert briefing.	0.10	\$345.00	\$34.50
06/13/23	Paralegal	Confer w/ JAF, JS, LB, JMS & JK re settlement strategy.	0.10	\$345.00	\$34.50
06/13/23	Paralegal	Confer w/ JAF, JS, LB, JMS & JK re upcoming class cert hearing.	0.10	\$345.00	\$34.50
08/08/23	Paralegal	Confer w/ JAF, JS, JMS and LB re upcoming mediation.	0.20	\$345.00	\$69.00
09/26/23	Paralegal	Confer w/ JS, JAF, LB and JMS re upcoming class cert argument.	0.20	\$345.00	\$69.00
10/17/23	Paralegal	Review ECF re Order granting pltf's renewed MCC.	0.10	\$345.00	\$34.50
10/18/23	Paralegal	Review ECF re d s transcript request for proceedings held on 10/5/2023.	0.10	\$345.00	\$34.50
10/18/23	Paralegal	Review ECF re Order granting Holbrook PHV application.	0.10	\$345.00	\$34.50
11/28/23	Paralegal	Emails w/ team re assembling time records iso any fee petition.	0.20	\$345.00	\$69.00
01/22/24	Paralegal	Email w/ all counsel re Verizon subpoena response.	0.20	\$345.00	\$69.00
01/22/24	Paralegal	Email w/ all counsel re class list.	0.20	\$345.00	\$69.00
02/07/24	Paralegal	Email w/ JAF, JS and JMS re scheduled oral argument on MtD.	0.10	\$345.00	\$34.50
02/07/24	Paralegal	Email w/ JK re scheduled oral argument on MtD.	0.10	\$345.00	\$34.50
02/15/24	Paralegal	Email w/ all counsel re pltf's service of notice of dep of Klatt; review attachment re same.	0.20	\$345.00	\$69.00
02/15/24	Paralegal	Emails w/ JAF, JK and co-counsel re finalizing notice of dep of Klatt; review attachment re same.	0.20	\$345.00	\$69.00
02/23/24	Paralegal	Confer w/ LB re upcoming dep of Klatt.	0.20	\$345.00	\$69.00
02/23/24	Paralegal	Emails w/ court reporter re upcoming dep of Klatt.	0.20	\$345.00	\$69.00
02/26/24	Paralegal	Emails w/ JAF re upcoming Klatt dep.	0.20	\$345.00	\$69.00
02/26/24	Paralegal	Conduct prep for upcoming Klatt dep.	0.50	\$345.00	\$172.50
02/26/24	Paralegal	Review Ds Objections and Responses to Plaintiff s Notice of Videotaped Deposition for Michelle Klatt.	0.10	\$345.00	\$34.50
02/27/24	Paralegal	F/u email w/ JAF re upcoming Klatt dep.	0.10	\$345.00	\$34.50
02/27/24	Paralegal	Emails w/ all counsel re zoom details for upcoming Klatt dep.	0.20	\$345.00	\$69.00
02/27/24	Paralegal	Conduct prep for upcoming Klatt dep.	0.40	\$345.00	\$138.00
02/27/24	Paralegal	Emails w/ co-counsel and JAF re upcoming Klatt dep.	0.20	\$345.00	\$69.00
02/27/24	Paralegal	Review Pltf's renewed MCC and supporting materials.	0.50	\$345.00	\$172.50
02/28/24	Paralegal	F/u emails w/ J. Nuss re prep for Klatt dep.	0.20	\$345.00	\$69.00
02/28/24	Paralegal	Continue prep for upcoming Klatt dep.	0.40	\$345.00	\$138.00
02/28/24	Paralegal	Confer w/ JAF re prep for Klatt dep.	0.20	\$345.00	\$69.00
02/28/24	Paralegal	Review Pritt Decl iso UHS Opp to Pltf's Renewe MCC.	0.20	\$345.00	\$69.00
02/28/24	Paralegal	Review UHS s Opp to Pltf's Renewed MCC.	0.30	\$345.00	\$103.50
02/28/24	Paralegal	Review Pltf's Reply iso Renewed MCC.	0.20	\$345.00	\$69.00
02/29/24	Paralegal	Emails w/ JAF, JS, LB, JMS and co-counsel re draft discovery letter to Def.	0.20	\$345.00	\$69.00

Date	Timekeeper	Narrative	Units	Rate	Value
03/27/24	Paralegal	Email w/ all counsel re T-Mobile s response to Plaintiff s subpoena (T-MOBILE 000001).	0.10	\$345.00	\$34.50
04/23/24	Paralegal	Email w/ all counsel re third party AT&T s response to Pltfs subpoena.	0.20	\$345.00	\$69.00
05/07/24	Paralegal	Emails w/ JAF, JMS, JK and co-counsel re Paluczak dep notice; review attachment re same.	0.20	\$345.00	\$69.00
05/07/24	Paralegal	Emails w/ JK and MW re communications w/ court reporter on Paluczak dep; review attachment re same.	0.20	\$345.00	\$69.00
05/08/24	Paralegal	Arranged court reporter and distributed deposition link to all counsel	0.30	\$345.00	\$103.50
05/13/24	Paralegal	Email w/ court reporter re request for confirmation for Paluczak dep; review attachment re same.	0.20	\$345.00	\$69.00
05/15/24	Paralegal	Email w/ co-counsel, JMS and JAF re amendment to Palucsak supplemental decl. review attachment re same.	0.20	\$345.00	\$69.00
05/15/24	Paralegal	Email w/ co-counsel, JMS and JAF re upcoming Palucsak dep.	0.10	\$345.00	\$34.50
05/16/24	Paralegal	Emails w/ court reporter, JK and MW re cancellation of Paluczak dep.	0.10	\$345.00	\$34.50
05/16/24	Paralegal	Email w/ MW and JK re request that co-counsel update distribution email list to include MW.	0.10	\$345.00	\$34.50
05/20/24	Paralegal	Confer w/ JS, JAF, LB, JK and JMS re discovery and next steps.	0.20	\$345.00	\$69.00
07/03/24	Paralegal	Downloaded, reviewed, and uploaded document production from defense	0.20	\$345.00	\$69.00
07/08/24	Paralegal	Prepared and served notices of dep for Dawn Janzig, Esmeralda Puchi, and Ellen Shimek-Goddard,	0.50	\$345.00	\$172.50
07/08/24	Paralegal	Ordered court reporter for Dawn Janzig, Esmeralda Puchi, and Ellen Shimek-Goddard,	0.20	\$345.00	\$69.00
07/08/24	Paralegal	Drafted Dep Notices	0.50	\$345.00	\$172.50
07/08/24	Paralegal	Finalized and served deposition notices	0.20	\$345.00	\$69.00
08/08/24	Paralegal	Confer w/ JAF, JS, LB, JMS, JK and MW re class size data.	0.10	\$345.00	\$34.50
08/08/24	Paralegal	Confer w/ JAF, JS, LB, JMS, JK and MW re upcoming deps.	0.10	\$345.00	\$34.50
08/22/24	Paralegal	Dep prep for Shimek-Goddard deposition	1.50	\$345.00	\$517.50
08/22/24	Paralegal	Confer w/ MW re prep for upcoming E. Shimek-Goddard dep.	0.20	\$345.00	\$69.00
08/22/24	Paralegal	Emails w/ JAF, JMS and MW re prep for upcoming Shimek-Goddard dep.	0.20	\$345.00	\$69.00
08/26/24	Paralegal	Emails w/ JAF and JMS re prep for upcoming Shimek-Goddard dep.	0.20	\$345.00	\$69.00
08/26/24	Paralegal	Emails w/ JAF and JMS all counsel re dep logistics for upcoming for upcoming Shimek-Goddard dep.	0.20	\$345.00	\$69.00
08/26/24	Paralegal	Emails w/ MW, JAF, JMS and co-counsel re dep logistics for upcoming Shimek-Goddard dep.	0.10	\$345.00	\$34.50
08/26/24	Paralegal	Emails w/ all counsel re defs witnesses and cancellation of Goddard-Shimek dep.	0.20	\$345.00	\$69.00
08/26/24	Paralegal	Emails w/ all counsel re defs agreement to supplement d s Rule 26(a) disclosures.	0.20	\$345.00	\$69.00
08/27/24	Paralegal	F/u emails w/ all counsel re outstanding discovery issues.	0.20	\$345.00	\$69.00
08/28/24	Paralegal	Ordered court reporter	0.20	\$345.00	\$69.00

Date	Timekeeper	Narrative	Units	Rate	Value
08/28/24	Paralegal	Finalized and served notice	0.20	\$345.00	\$69.00
08/28/24	Paralegal	Ordered court reporter, videographer, real time, and troubleshoot tech for Dawn Janzig deposition	1.00	\$345.00	\$345.00
08/29/24	Paralegal	Prepared materials/exhibits for deposition of Dawn Janzig	1.00	\$345.00	\$345.00
08/29/24	Paralegal	Prepared for 30b1 and 30b6 depositions scheduled for 8/30	0.50	\$345.00	\$172.50
08/29/24	Paralegal	Ran exhibits for deposition	5.50	\$345.00	\$1,897.50
08/29/24	Paralegal	Janzig dep prep (gathering Jim s requested exhibits, reviewing outline, reviewing file for addnl exhibits)	2.00	\$345.00	\$690.00
08/29/24	Paralegal	Reviewed documents, call recordings, and prepared exhibits	1.00	\$345.00	\$345.00
08/30/24	Paralegal	Prepared and ran exhibits for the deposition of Stacy Bowdish (30b1 and 30b6)	4.00	\$345.00	\$1,380.00
08/30/24	Paralegal	Reviewed documents, call recordings, and prepared exhibits	1.50	\$345.00	\$517.50
09/04/24	Paralegal	Ran exhibits for deposition of Esmeralda Puchi	4.00	\$345.00	\$1,380.00
09/04/24	Paralegal	Prepared exhibits for deposition of Esmeralda Puchi	1.00	\$345.00	\$345.00
09/04/24	Paralegal	Emails coordinating obtaining all outstanding dep transcripts	0.40	\$345.00	\$138.00
09/04/24	Paralegal	Emails w. USLegal Support re obtaining dep transcript of Michelle Klatt	0.20	\$345.00	\$69.00
09/04/24	Paralegal	Emails w/ JAF, JMS and MW re Klatt dep transcript and exhibits.	0.20	\$345.00	\$69.00
09/05/24	Paralegal	Circulated dep transcripts to outside counsel	0.20	\$345.00	\$69.00
09/06/24	Paralegal	Circulated dep transcripts to outside counsel	0.20	\$345.00	\$69.00
09/16/24	Paralegal	Reviewed/downloaded ECFs 327-332	0.80	\$345.00	\$276.00
09/17/24	Paralegal	Reviewed and filed ECF 333	0.20	\$345.00	\$69.00
09/18/24	Paralegal	Prepared and circulated dep transcript package to outside co-counsel	0.50	\$345.00	\$172.50
09/20/24	Paralegal	Reviewed and filed ECF 334	0.20	\$345.00	\$69.00
09/23/24	Paralegal	Reviewed and filed ECF 335	0.20	\$345.00	\$69.00
09/23/24	Paralegal	Reviewed and filed ECF 336	0.30	\$345.00	\$103.50
10/16/24	Paralegal	Prepared exhibits for deposition of defendant s expert	1.00	\$345.00	\$345.00
10/17/24	Paralegal	Ran deposition of defendant s expert	6.00	\$345.00	\$2,070.00
11/01/24	Paralegal	Reviewed Stipulated Motion and Proposed Order Decertifying Do Not Call	0.20	\$345.00	\$69.00
11/06/24	Paralegal	Reviewed Order Decertifying Do Not Call Class (ECF 338)	0.20	\$345.00	\$69.00
11/13/24	Paralegal	Confer w/ JS, JMS, MT and MW re pltf s fee petition and next steps.	0.10	\$345.00	\$34.50
11/18/24	Paralegal	Reviewed Order on Motions to Seal (ECF 339)	0.20	\$345.00	\$69.00
12/06/24	Paralegal	Reviewed ECF 340	0.20	\$345.00	\$69.00
12/13/24	Paralegal	Reviewed ECF 341	0.20	\$345.00	\$69.00
12/13/24	Paralegal	Reviewed ECF 342	0.20	\$345.00	\$69.00
12/13/24	Paralegal	Reviewed ECF 343	0.20	\$345.00	\$69.00
12/18/24	Paralegal	Reviewed ECF 344	0.20	\$345.00	\$69.00

Time Detail - Francis Mailman Soumilas, P.C.

Samson v. UnitedHealthcare Services, Inc.

Date	Timekeeper	Narrative	Units	Rate	Value
12/20/24	Paralegal	Emails w/ co-counsel, JAF and JMS re settlement agreement; review attachment re same.	0.20	\$345.00	\$69.00
12/23/24	Paralegal	Reviewed ECF 345	0.20	\$345.00	\$69.00
12/23/24	Paralegal	Reviewed ECF 346	0.20	\$345.00	\$69.00
01/28/25	Paralegal	Fee petition declaration drafting	2.50	\$345.00	\$862.50
01/29/25	Paralegal	Fee petition materials preparation	2.00	\$345.00	\$690.00
01/31/25	Paralegal	Fee petition planning meeting	0.50	\$345.00	\$172.50
02/12/25	Paralegal	Emails w. FMS staff/attorneys re preparation of fee petition materials	0.30	\$345.00	\$103.50
03/03/25	Paralegal	Emails w. FMS staff/attorneys re preparation of fee petition materials	0.30	\$345.00	\$103.50
Paralegal Total:			154.0		\$53,130.00
Francis Mailman Total:			1,476.6		\$1,052,716.00

Exhibit C



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March 10, 2025

James A. Francis, Esquire
Francis, Mailman, Soumilas, P.C.
1600 Market Street
Suite 2510
Philadelphia, PA 19103

Re: Billing Rates For Seattle, Washington

Dear Mr. Francis:

1. INTRODUCTION

For the last several years, I have provided you with my expert opinion with regard to the range of reasonable hourly billing rates for the lawyers at Francis Mailman Soumilas, P.C. ("Francis Mailman Soumilas" or "the Firm") in various jurisdictions, including Philadelphia, PA, San Francisco, CA, Rochester, NY, and Portland, OR. For jurisdictions outside of Philadelphia, I have consulted with my Fox Rothschild partners who are located in and/or practice in those locations. You have now asked me to opine on the range of reasonable hourly billing rates in Seattle, WA. Consistent with past practice, I have consulted with a Fox Rothschild partner in our Seattle office to confirm the accuracy of the following opinion.

2. QUALIFICATIONS

I am a partner at the law firm of Fox Rothschild LLP ("Fox Rothschild"). I have been at Fox Rothschild since 1974 as a member of its Litigation Department. From 2005 through 2017, I served as Co-Chair of Fox Rothschild and now hold the title of Chair Emeritus. For five years prior to becoming Co-Chair, I was the Managing Partner of the Philadelphia office. I have been a member of the management group at Fox Rothschild since 1985. I was the founding member of Fox Rothschild's Professional Responsibility Committee (in 1988) and served as Chair of the Committee for eight years.



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As part of the management of Fox Rothschild over the past forty years, I have participated in the review and analysis of the hourly rates that we charge for our lawyers. This review is completed at least once a year and involves a review and analysis of the markets in which we participate to ensure that we set competitive rates and that the rates we charge are consistent with the Rules of Professional Conduct (or its predecessor, the Code of Professional Responsibility).

The process of setting hourly billable rates encompasses a number of steps. Initially, Fox Rothschild obtains public data of national, regional and local law firms' hourly billing rates. In addition, management often speaks with consultants with expertise in this area to ensure that our rates are within the range of our competitors in the market. The management team, which comprises leaders from each of our offices, discusses the hourly billing rates in each of our markets.¹ We try to establish rates that are fair and competitive.

I have had an active litigation practice for more than fifty years. The majority of my practice involves commercial litigation matters, in which I represent plaintiffs and defendants. I have also been active for many years representing lawyers and law firms in a myriad of issues involving professional responsibility and legal ethics, including the defense of legal malpractice claims. I have also been involved in dealing with fee disputes between and among lawyers and their clients. In 1998, I was selected to be a Fellow of the American College of Trial Lawyers.

In Fox Rothschild's litigation practice, we have handled matters in the area of consumer law. Our firm has represented large financial institutions, which have been sued for violations of the Fair Credit Reporting Act ("FCRA"), the Consumer Credit Protection Act ("CCPA") and the Fair Debt Collection Protections Act ("FDCPA"). We have defended some of the parties sued by clients of Francis Mailman Soumilas.

For over forty years, I have been active in the area of legal ethics and the interpretation and application of the Pennsylvania Rules of Professional Conduct (and its predecessor, the Code of Professional Responsibility). For many years, I have been a member of the Philadelphia Bar Association's Professional Responsibility Committee and Professional Guidance Committee. In 1983 and 1984, I served as Chair of the Professional Responsibility Committee. In 1987 and 1988, I served as Chair of the Professional Guidance Committee. I have also served as a member of a Hearing Committee for the Disciplinary Board of the Supreme Court of Pennsylvania for six years. For a portion of that time, I chaired the Hearing Committee. From approximately 1988 to 1995, I

¹ Fox Rothschild currently has thirty offices in distinct marketplaces throughout the country, including Philadelphia, New York, Chicago, Denver, Seattle, and San Francisco.



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have also served as one of two appointed lawyers (non-judicial) liaisons to the Judicial Ethics Committee of the Pennsylvania Conference of State Trial Judges.

I have, for many years, served on the Legal Ethics and Professional Responsibility Committee of the Pennsylvania Bar Association. For the past twenty years, I have taught legal ethics and professional responsibility at the University of Pennsylvania Carey Law School.

In 1995, I served as Chancellor of the Philadelphia Bar Association. I have been a member of the House of Delegates of the American Bar Association and the Pennsylvania Bar Association for over twenty-five years. I participated in the debates surrounding the enactment of the Model Rules of Professional Conduct and many of the Amendments.

I have spoken and written on issues of trial practice and legal ethics over many years in many different forums. I have counseled hundreds of lawyers on issues of legal ethics and professional responsibility.

3. DOCUMENTS REVIEWED

I have reviewed the following documents as part of my analysis:

1. Francis Mailman Soumilas Firm Biography.
2. Francis Mailman Soumilas Attorney Biographies.
3. Francis Mailman Soumilas current hourly rates.
4. 50th Annual Survey of Law Firm Economics (2022 Edition).
5. Valeo Reports: Annual Partner Billing Rates for Seattle, WA.
6. Thomson Reuters Financial Insights: hourly rates for Seattle attorneys employed by AmLaw 200 firms.
7. Fox Rothschild LLP current rate schedule for its Seattle lawyers.



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4. **DISCUSSION**

A. The Firm's Accomplishments

Francis Mailman Soumilas ("FMS") is one of the leading law firms representing clients in consumer-related litigation in both individual and class action suits. When the Firm was founded in 1998, few firms were actively litigating cases under the CCPA. In addition, Francis Mailman Soumilas was one of the first firms to have a significant legal practice concentrating in federal fair credit reporting, fair debt collection and consumer class actions. Over the past twenty-six years, Francis Mailman Soumilas has become a well-known and highly regarded firm in the area of consumer protection litigation.

FMS has obtained record-breaking jury verdicts and settlements in cases brought under the Fair Credit Reporting Act (FCRA). It has been certified to serve as class counsel in more than 70 consumer class actions nationwide and has obtained groundbreaking legal rulings at both the trial and appellate court levels on behalf of its clients. The firm has further served as counsel in some of the largest class action settlements in consumer protection litigation history. The following examples illustrate the groundbreaking work of FMS in the area of consumer law.

In *Ramirez v. Trans Union*, C.A. No. 12-cv-000632-JSC (N.D. Cal.), the Firm tried a class action case against Trans Union (one of the country's "big three" credit reporting agencies) and obtained a \$60 million verdict on behalf of a class of 8,000 people who were mislabeled as Office of Foreign Assets Control (OFAC) criminals by Trans Union on credit reports in a claim brought under the FCRA. *Ramirez* is a record FCRA verdict, a rare class verdict, and was one of the top verdicts for 2017. Thereafter, Francis Mailman Soumilas argued the appeal against the former Solicitor General of the United States and the Ninth Circuit affirmed the trial court verdict (with remittitur): 951 F.3d 1008 (9th Cir. 2020). The United States Supreme Court granted certiorari in 2020, and in March of 2021, issued a 5-4 decision reversing the trial court's decision in part on the basis of its finding only a portion of the certified class had Article III jurisdiction. 141 S.Ct. 2190 (2021). The Firm achieved a \$9 million dollar settlement, which was approved by the United States District Court for the Northern District of California. 2022 WL 17740302 (N.D. Cal. Dec. 22, 2022).

In *Robinson v. National Student Clearinghouse*, No. 1-19-cv-107490, 2020 WL 4873728 (D. Mass. July 8, 2020) *aff'd* 14 F.4th 56 (1st Cir. 2021), the Firm successfully obtained a \$2 million settlement for consumers who were overcharged for college verifications. This case was notable for the Firm's decision to challenge the defendant as a consumer reporting agency and ultimately bring the defendant into compliance with the FCRA.



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In *Patel v. Trans Union, LLC*, 2018 WL 1258194 (N.D. Cal. March 11, 2018), the Firm served as lead Class Counsel and obtained an \$8 million settlement for a class of consumers who were falsely being reported as terrorists.

In *Thomas v. Equifax Info. Services, LLC*, No. 18-cv-684 (E.D. Va.), Francis Mailman Soumilas served as National Class Counsel in an FCRA class action alleging violations by a credit bureau for misreporting public records. The Firm provided a nationwide resolution of class action claims that were asserted across multiple jurisdictions (including injunctive relief) and an uncapped mediation program for millions of consumers. The Firm also served as National Class Counsel and obtained similar relief for millions of consumers with similar claims in *Clark v. Experian Info. Sols., Inc.*, No. 16-cv-32 (E.D. Va.) and *Clark/Anderson v. Trans Union, LLC*, NO. 15-cv-391 and No. 16-cv-558 (E.D. Va.).

In *Beach v. American Heritage Federal Credit Union*, C.A. No. 15-5942 (E.D. Pa. July 26, 2017), the Firm obtained a settlement exceeding \$1 million against American Heritage Federal Credit Union (“AHFCU”) for AHFCU having generated a cash advance from consumers’ accounts to pay fees, interest, charges or attorney fees. The court in *Beach* noted the Firm’s experience in consumer class actions and found that “[t]he settlement agreement in this matter resulted from Class Counsel’s vigorous advocacy and contested, protracted settlement negotiations.”

In *Flores v. Express Services, Inc., et al.*, C.A. No. 14-3298 (E.D. Pa. March 30, 2017), the Firm brought an action against Express Services, Inc. and Express Personnel – Philadelphia for violations of the FCRA and obtained a \$5.75 million settlement on behalf of the class. The court found that the skill and efficiency of the Firm was apparent, having “achieved a significantly favorable result on behalf of plaintiffs at the expense of the inherent risk that accompanies undertaking a contingency fee action,” and also noted that Francis Mailman Soumilas has extensive experience in consumer class action litigation.

In *White v. Experian Info. Solutions*, C.A. No. 05-01070, 2014 WL 1716154 (C.D. Cal. May 1, 2014), the court found Francis Mailman Soumilas “FCRA specialists” and appointed the Firm and its team as interim class counsel over objections from competing groups (including Boise Schiller) because the Francis, Mailman, Soumilas team’s “credentials and experience [we]re significantly stronger in class action and FCRA litigation”; affirmed sub nom *Radcliffe v. Experian Information Solutions, Inc.*, 818 F.3d 537 (9th Cir. 2016).

In *Henderson v. Axiom Risk Mitigation, Inc.*, C.A. No. 12-589 (E.D. Va. Aug. 7, 2015), Francis Mailman Soumilas was appointed class counsel in a national FCRA class action and obtained a



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\$20.8 million settlement against one of the largest data sellers and background screening companies in the world.

In *Thomas v. BackgroundChecks.com*, C.A. No. 13-029 (E.D. Va. Aug. 11, 2015), Francis Mailman Soumilas was appointed class counsel in an FCRA national class action and obtained \$18 million against another one of the largest background screening companies in the world, in addition to significant injunctive and remedial relief.

Additionally, Francis Mailman Soumilas has been certified as class counsel in federal and state courts throughout the country in over 70 matters. The Firm has been certified as class counsel in the following matters²:

- *Teran v. Navigant Solutions, LLC et al.*, ___ B.R. ___, 2023 WL 2721904 (Bankr. N.D. Cal. Mar. 30, 2023) (appointed class counsel to represent national injunctive relief class).
- *Stewart et al. v. LexisNexis Risk Data Retrieval Services, LLC et al.*, No 3:20-cv-00903-JAG (E.D. Va. July 27, 2022);
- *Kang v. Credit Bureau Connection*, No. 18-1359, 2022 WL 658105 (E.D. Cal. Mar 4, 2022)
- *Rivera v. Equifax Info. Services, LLC*, 341 F.R.D. 328 (N.D. Ga. 2022)
- *Healy v. Milliman, Inc.*, No. 2:20-cv-01473-JCC (W.D. Wash. 2022)
- *Watson v. Checkr, Inc.*, No. 3:19-cv-03396-EMC (N.D. Cal. 2021)
- *Deaton v. Trans Union, LLC*, No. 2:20-cv-01380-AB (E.D. Pa. 2021)
- *Sanders v. Makespace Labs, Inc.*, No: 1:18-cv-10016 (S.D.N.Y. Mar. 29, 2021)
- *Der-Hacopian v. Darktrace, Inc.*, No: 18-cv-06726-HSG (N.D. Cal. Dec. 10, 2020)
- *Der-Hacopian v. Sentrylink, LLC*, No. 8:18-cv-03001-PWG (N.D. Cal. Nov. 23, 2020)
- *McIntyre v. RealPage, Inc.*, No: 2:18-cv-03934, WL 5017612 (E.D. Pa. Aug. 25, 2020)

² This is only a partial list of the matters where FMS has been certified as class counsel.



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- *Norman v. Trans Union, LLC*, No: 18-5225, 2020 WL 4735538 (E.D. Pa. Aug. 14, 2020)
- *Thomas v. Equifax Info. Services, LLC*, NO. 18-cv-684 (E.D. Va. 2020)

In addition to obtaining substantial and favorable verdicts, the Firm has also made significant contributions to public policy. The Firm set legal precedent and clarified legal issues, including: (i) the proper standard for the investigation of a consumer dispute by credit reporting agencies and furnishers of information; (ii) the standard for proving willfulness under the FCRA; (iii) the accuracy standard for credit reports; (iv) the types of information permitted to be included in credit reports; (iv) the types of cognizable actual damages available in an FCRA action; (v) the consumer's burden of proof in an FCRA action; and, (vi) proper jury charges. Francis Mailman Soumilas has also been counsel to some of the largest FCRA settlements in history, such as *Acxiom* (\$20.8 million), *Ramirez* (\$9 million), *Hireright*, (\$29 million) and *White/Hernandez* (\$45 million).

Through Francis Mailman Soumilas' jury verdicts and class settlements, the Firm has established the "market value" for class and individual cases under the FCRA and the FDCPA. I have been informed that there were few to no reported plaintiff FCRA verdicts prior to the Firm's victories. Moreover, Francis, Mailman, Soumilas has helped establish the standards for obtaining class certification in FCRA and FDCPA cases. *See, e.g., Cortez*.

The attorneys at Francis Mailman Soumilas are very active and well known in the legal community. They regularly share their expertise at local and national conferences. By way of example, attorneys from the Firm made the following presentations: Speaker: *Spring Training, 2023 (FCRA) National Association of Consumer Advocates*, May 3-5, 2023, New Orleans, LA; Speaker: *Rule 23(c)(5) Subclasses: Certification, Due Process, Adequate Representation, and Settlement*, Stafford Webinars, February 23, 2023; Speaker: *Data Protection at the Federal Level*, Nevada Bar Association, January 17, 2023; Speaker: *27th Annual Consumer Financial Services Institute*, Practising Law Institute, *Debt Collection and Credit Reporting Update*, December 7, 2022, San Francisco, CA; Speaker: *Tenant Screening Litigation: FCRA and Civil Rights Claims*, National Consumer Law Center, Consumer Rights Litigation Conference, November 10, 2022, Seattle WA; Speaker: "Lightning-Round Ascertainability", Consumer Class Action Symposium, National Consumer Law Center, November 13, 2022, Seattle, WA.

Attorneys from the Firm also served on the faculty for the *Perrin Conferences Class Action Litigation Virtual Conference*, April 26, 2022; as a Panel Member for the *27th Annual Consumer Financial Services Institute- Debt Collection and Credit Reporting Update* on September 20, 2022 in Chicago and March 18, 2022 in New York, NY; as a speaker for *Consumer Finance Class*



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Actions: FDCPA, FCRA & TCPA Webinar on September 16, 2020, and at Representing the Pro Bono Client: Consumer Law Basics in 2020 and 2019, presented by the Practicing Law Institute. Firm members also served on the faculty for Consumer Financial Services & Banking Law Update, presented by the Pennsylvania Bar Institute on October 29, 2019 and Consumer Finance Class Actions, presented by The Canadian Institute on July 24, 2019.

Members of the Firm also spoke at the Fair Credit Reporting Act Conference, National Association of Consumer Advocates, in Long Beach, CA in May 2019 and Baltimore, MD in April 2017. They also served on the faculty for the 21st Annual Consumer Financial Services Litigation Institute (which was CLE accredited) on "Fair Credit Reporting and Debt Collection Litigation," which took place in March and April 2016 in New York City and Chicago.

One of the founding partners, James A. Francis, has been repeatedly named to the Top 100 Pennsylvania Super Lawyers, as well as the Top 100 Philadelphia Super Lawyers, including as recently as 2023 and 2024. Mr. Francis was elected as a Fellow of the American College of Consumer Financial Services Lawyers in 2023 and was also selected as a member of the Nation's Top One Percent by the National Association of Distinguished Counsel in 2024. Mr. Francis was also featured on LAW360 in October 2014 as one of a small handful of American plaintiff's lawyers to be selected from a national pool and featured as part of the "Titans of the Plaintiff's Bar" series. *See <https://www.law360.com/articles/583536/titan-of-the-plaintiffs-bar-jim-francis>.* Mr. Francis has been appointed to serve as class counsel by federal courts throughout the country in more than 70 cases.

Mark Mailman, also a founding partner and currently the managing partner of the Firm, was awarded the 2018 Consumer Attorney of the Year award from the National Association of Consumer Advocates (NACA). Mr. Mailman has repeatedly been voted and named one of Pennsylvania's Super Lawyers by Law and Politics published by Philadelphia Magazine and Pennsylvania Super Lawyer Magazine from 2004- present. He has also appeared on various news programs to discuss trending consumer issues and recently published an article in *The Legal Intelligencer*, a prominent Philadelphia legal publication, entitled "Your clients' consumer rights legal issues may be hiding in plain sight". Mark regularly lectures for continuing legal education programs, law schools and community groups throughout the country, and has been a regular speaker for the National Association of Consumer Advocates (NACA) and National Consumer Law Center (NCLC) for more than 20 years.

John Soumilas, another partner of the firm, was lead class counsel and lead trial counsel in the record breaking \$60 million class action jury verdict, the largest verdict in history for a case brought under the FCRA. Mr. Soumilas has been nationally recognized for his work in protecting consumer rights under the FCRA and, throughout his career, has obtained some of the highest consumer jury verdicts, including the highest known FCRA verdicts in Pennsylvania, California, and Michigan. Mr. Soumilas



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has also been appointed by federal judges as class counsel in some of the largest FCRA class cases and settlements. Mr. Soumilas' has career settlements and verdicts valued at more than \$180 million.

B. Methodology for Determining Rates

There are two complementary approaches for determining reasonable hourly rates.

The **first approach** is to consider the rates for comparably skilled practitioners in the relevant market. To that end, I have reviewed the hourly billing rates of lawyers in Seattle and comparable local areas.

One source I considered was data collected by Thomson Reuters Financial Insights that identified hourly rates for attorneys in Seattle employed by AmLaw 200 firms. That report showed Seattle associate rates between \$573 - \$790; equity partner rates between \$956 - \$1150; and non-equity partner rates between \$780 - \$1,004, all depending upon number of years of experience.

The hourly rates of Seattle lawyers using data collected by Valeo Partners was also a source I consulted. Specifically, I considered a three-year average of rates (2023-2025) for Seattle attorneys with various law firm titles. For more experienced lawyers (i.e., Equity Partner, Partner, Senior Counsel and Of Counsel), the range of average rates was between \$535 - \$1080. For lower or mid-level attorneys (i.e., Associate, Attorney, Counsel or Shareholder), the range of average rates was between \$594 - \$733. For entry level attorneys or those with a limited role (i.e., Staff Attorney or Discovery Attorney), the range of average rates was between \$400 - \$416.

I have also reviewed the current hourly rates set by my firm for its Seattle lawyers and I have consulted with colleagues in my firm's Seattle office who have served in management capacities and have experience in setting hourly rates in those jurisdictions. As I stated above, the process of setting hourly rates for my firm begins with obtaining public data, speaking with knowledgeable consultants, and discussions with the management team.

A **second approach** to determine a reasonable hourly rate would look at the relevant factors set forth in Rule 1.5(a) of the Rules of Professional Conduct.

While the Pennsylvania Rules of Professional Conduct do not specifically address the reasonableness of a specific hourly rate, they do address the considerations for assessing "the propriety of a fee" in Rule 1.5. In my opinion, some of those considerations can provide a useful analytical checklist when trying to determine a reasonable hourly rate.

The factors set forth in Rule 1.5(a) are:



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

Factor Number 4 [“The fee customarily charged in the locality for similar legal services”] has already been addressed. This is a comparative review of rates charged by other lawyers in the market.

Factor Number 1 [“whether the fee is contingent or fixed”] suggests that higher rates may be justified when fees are contingent. Francis Mailman Soumilas handles its cases on a contingent fee basis. As a result, the Firm bears all the risk of the cost of litigation until resolution. In some instances, the Firm may not receive payment of its fees for several years. Further, most of the defendants are large companies with substantial financial resources and lawyers equipped to defend the actions. Many of the lawsuits address novel areas of law. In order to obtain favorable outcomes, the attorneys at Francis Mailman Soumilas spend numerous hours conducting research, conducting discovery, and crafting innovative legal arguments to overcome attempts to have their clients’ cases dismissed before trial. The Firm’s investment of time and resources prevent it from litigating numerous matters at the same time.

³ Washington Rule of Professional Conduct 1.5(a) enumerates the same factors for determining the reasonableness of a fee but also includes an additional factor: the terms of the fee agreement between the lawyer and the client, including whether the fee agreement or confirming writing demonstrates that the client had received a reasonable and fair disclosure of material elements of the fee agreement and of the lawyer's billing practices.



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Factor Number 2 [“The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly”] also supports the notion that a higher rate would be justified for lawyers at Francis Mailman Soumilas who have distinguished themselves in their area of expertise. Finally, Factor Number 8 [“The expertise, reputation, and ability of the lawyer or lawyers performing the services”] likewise provides another reason to justify increasing rates recommended for the lawyers at Francis, Mailman, Soumilas.

The table below displays Francis Mailman Soumilas’ current hourly billing rates in jurisdictions outside of Seattle and dates of admission to the Bar. I have been advised that in federal court hearings, the judges who have been presented with the rates I and the colleagues of my firm have supported have found them to be reasonable. *See, e.g., Chakejian v. Equifax Information Services, LLC*, 275 F.R.D. 201 (E.D. Pa. 2011), *Sapp v. Experian Information Solutions, Inc.*, 2013 WL 2130956 (E.D. Pa. May 15, 2013); *Gibbons v. Weltman, Weinberg & Reis Co., LPA*, C.A. No-17-0151-JHS (E.D. Pa., Jan. 26, 2022)(“And I’ve also read the Report of Abe Reich, Esquire, that confirms the reasonableness of the billing rates and fees charged in this case.”)

Attorney/Paralegal	Range of Hourly Billing Rates (Philadelphia)	Range of Hourly Billing Rates (New York)	Range of Hourly Billing Rates (Chicago)	Range of Hourly Billing Rates (San Francisco)	Range of Hourly Billing Rates (Portland, OR)	Range of Hourly Billing Rates (Rochester, NY)
James A. Francis (1995)	\$840 - \$880	\$1100 - \$1140	\$945-\$985	\$910-\$950	\$705-\$745	\$680-\$720
Mark D. Mailman (1995)	\$840 - \$880	\$1100 - \$1140	\$945-\$985	\$910-\$950	\$705-\$745	\$680-\$720
David A. Searles (1975)	\$855 - \$895	\$1190 - \$1230	\$1025-\$1065	\$940-\$980	\$720-\$760	\$690-\$730
Geoffrey H. Baskerville (1992)	\$690 - \$730	\$960-\$1000	\$825-\$865	\$755-\$795	\$565-\$605	\$545-\$585
John Soumilas (1999)	\$730 - \$770	\$1025-\$1065	\$875-\$915	\$805-\$845	\$600-\$640	\$650-\$690
Lauren KW Brennan (2013)	\$430 - \$470	\$605-\$645	\$500-\$540	\$460-\$500	\$400-\$440	\$360-\$400
Jordan Sartell (2012)	\$405 - \$445	\$590-\$630	\$480-\$520	\$445-\$485	\$355-\$395	\$340-\$380



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Attorney/Paralegal	Range of Hourly Billing Rates (Philadelphia)	Range of Hourly Billing Rates (New York)	Range of Hourly Billing Rates (Chicago)	Range of Hourly Billing Rates (San Francisco)	Range of Hourly Billing Rates (Portland, OR)	Range of Hourly Billing Rates (Rochester, NY)
Joseph Gentilcore (2011)	\$420 - \$460	\$600- \$640	\$505- \$545	\$465-\$505	\$365-\$405	\$345-\$385
Erika Heath	\$450 - \$490	\$625- \$665	\$550- \$590	\$515-\$545	\$385-\$425	\$370-\$410
Kevin Mallon	\$720 - \$760	\$1015- \$1055	\$865- \$905	\$790-\$830	\$590-\$630	\$640-\$680
Siobhan McGreal	\$450 - \$490	\$625- \$665	\$550- \$590	\$515-\$545	\$385-\$425	\$370-\$410
Experienced paralegal	\$345	\$345	\$345	\$345	\$325	\$275
Inexperienced paralegal	\$295	\$295	\$295	\$295	\$275	\$235

C. CONCLUSION

In accordance with the foregoing analysis and based upon my review of the prevailing market hourly billing rates, it is my opinion, within a reasonable degree of professional certainty, that the following represents a range of reasonable hourly billing rates for Francis Mailman Soumilas in the Seattle market, and within the considerations outlined in the Rules of Professional Conduct. Moreover, my colleague in Seattle has reviewed this report and concurs with the rates outlined below. The level of hourly billing rates within the range will depend on the complexity of the matter, the duration of the dispute and the result obtained.

Attorney/Paralegal	Range of Hourly Billing Rates (Seattle)
James A. Francis (1995)	\$820 - \$840
Mark D. Mailman (1995)	\$820 - \$840
David A. Searles (1975)	\$835 - \$875
Geoffrey H. Baskerville (1992)	\$670 - \$710



James A. Francis, Esquire

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Attorney/Paralegal	Range of Hourly Billing Rates (Seattle)
John Soumilas (1999)	\$710 - \$745
Lauren KW Brennan (2013)	\$430 - \$470
Jordan Sartell (2012)	\$405 - \$445
Joseph Gentilcore (2011)	\$420 - \$460
Erika Heath	\$450 - \$490
Kevin Mallon	\$700 - \$740
Siobhan McGreal	\$450 - \$490
Experienced paralegal	\$345
Inexperienced paralegal	\$295

D. SUPPLEMENTAL INFORMATION

Attached as Exhibit A is a copy of my curriculum vitae. It contains is a list of all publications that I have authored in the past ten years. I have not testified as an expert at trial in the past four years. In the past four years, I testified at a deposition as an expert witness in a confidential dispute involving a lawyer who became disabled. The matter was unrelated to an analysis of hourly rates. My current hourly rate is \$1,275.00. I have been assisted in preparing this opinion by my partner, Beth Weisser, whose hourly rate is \$775.00. We spent approximately \$5,000.00 in preparing this opinion.

If I am provided with additional information, I reserve the right to supplement or amend my opinion.

Very truly yours,

Abraham C. Reich

ACR:cah

Exhibit A

Two Commerce Square
 2001 Market Street, Suite 1700
 Philadelphia, PA 19103
 215-299-2090 | www.foxrothschild.com
areich@foxrothschild.com

ABRAHAM C. REICH

PROFESSIONAL ASSOCIATION FOX ROTHSCHILD LLP

- Chair Emeritus, Fox Rothschild LLP (April 2017 to Present)
- Co-Chairman, Fox Rothschild LLP (April 2005 to March, 2017)
- Firm Executive Committee
- Partner, Litigation Department
- Former Managing Partner, Philadelphia Office (2000- April 2005)
- Professional Responsibility Committee (1998-2008), (Founding Member and Former Chair)

Abe has been with the firm since 1974. His area of practice involves all aspects of business litigation and counseling, including representation of lawyers and law firms in defense of legal malpractice claims and other disputes. Abe has taught professional responsibility at University of Pennsylvania Carey School of Law since 2007. He also provides expert testimony in connection with legal ethics and professional responsibility and business litigation matters.

EDUCATION

- The Beasley School of Law at Temple University, J.D. 1974, Editor, Law Review
- University of Connecticut, B.A., magna cum laude; 1971, Elected to Phi Beta Kappa and Phi Kappa Phi

ADMISSIONS

- Pennsylvania
- United States Supreme Court
- United States Courts of Appeal for the Third, Fourth, Seventh and Eighth Circuits

PROFESSIONAL ASSOCIATIONS

- Fellow, American College of Trial Lawyers
- American Bar Association, House of Delegates (1995-2015; 2017-2025)
- American Bar Foundation
- American Association for Justice (formerly American Trial Lawyers Association)
- Association of Professional Responsibility Lawyers
- Pennsylvania Bar Association, House of Delegates; First Statewide Bench Bar Conference, Chair, 1986; Legal Ethics and Professional Responsibility Committee; Co- Chair, Task Force to Revise the Code of Judicial Conduct, 2012- 2013
- Pennsylvania Association for Justice (Formerly Pennsylvania Trial Lawyers Association) Board of Governors, 1985-1990; Commercial Litigation Committee, Former Co-Chair
- The Beasley School of Law at Temple University, Board of Overseers

**PHILADELPHIA BAR
ASSOCIATION
ACTIVITY**

- Chancellor, 1995
- Board of Governors, 1987-1999; Chair, 1989
- Commission on Judicial Selection and Retention, 1986-1989, 1993-1994; Vice-Chair, 1989; Chair, Investigative Division, 1988-1989
- Professional Guidance Committee; Chair, 1987-1988
- Professional Responsibility Committee; Chair, 1983-1984
- Annual Conference Committee (Bench Bar Conference), Vice-Chair, 1984; Chair, 1985
- Trustee, Philadelphia Bar Foundation, 1993-1996

-
- Trustee, Philadelphia Bar Education Center, 1993-1999
 - Trustee, International Human Rights Fund, 1993-1995
 - Federal Courts Committee
 - State Civil Judicial Procedures Committee
 - Editorial Board, the Philadelphia Lawyer, 1975-1987 (Former Publication of Business Law Section)
 - Counsel to Philadelphia Bar Association in *Restifo v. Philadelphia Bar Association*, 1991-1994

**OTHER
ORGANIZATIONAL
ACTIVITY**

- Adjunct Professor, University of Pennsylvania Carey School of Law, “Ethics and Advocacy – From the Boardroom to the Courtroom”; Spring Semesters 2007-2025
- The Continuing Legal Education Board of the Supreme Court of Pennsylvania, Board Member 2005 – 2010; Chair, 2011
- The Disciplinary Board of the Supreme Court of Pennsylvania, Former Hearing Committee Member and Chair, 1985-1991
- Pennsylvania Committee of State Trial Judges, Lawyer Liaison, Judicial Ethics Committee, 1988-1995
- Campaign for Qualified Judges, Former Trustee
- Pennsylvania Law Journal-Reporter, Former Member of Corporate Law Advisory Board
- The Legal Intelligencer, Former Editorial Board Member, 1992
- Lawyers Club of Philadelphia, Former Member of Board of Directors
- United States Court of Appeals for the Third Circuit, Task Force on Equal Treatment in the Courts, 1996
- Lawyer’s Advisory Committee, United States Court of Appeals for the Third Circuit, Chair, 1998
- Jenkins Law Library, Board Member and President (1995-2015)
- Pennsylvanians for Modern Courts, Advisory Board Member
- Brandeis Law Society Foundation, Director

PUBLICATIONS

- Co-Author, The Metaverse for the Risk-Averse: Law Firms and Legal Advertising, Parts 1 and 2, Pennsylvania Law Weekly, 45 PLW 962 (October 25, 2022) and 45 PLW 966 (November 8, 2022)
 - Contributing Author, Successful Partnering Between Inside and Outside Counsel – Ethics, Chapter 31 (Thomson Reuters 2009-2020)
 - Contributing Author, Pennsylvania Ethics Handbook, Pennsylvania Bar Institute, 2008, 2011, 2014, 2017
 - Co-Author, Attorney Self-Governance, Federal Oversight Clash in Dodd-Frank Act, The Legal Intelligencer, November 15, 2010
 - Co-Author: The Lawyer’s Duty of Disclosure: Ethics and Sarbanes-Oxley – The New Conundrum for Patent Lawyers, Akron Intell. Prop. 43-63, 2007
 - “The IP Lawyer’s Duty of Disclosure Under Sarbanes-Oxley,” The Legal Intelligencer – May 8, 2006
 - Co-Author: When Competition Crosses The Line, Mid-Atlantic Executive Legal Advisor, Winter 2005
 - Co-Author: What Do You Do When Confronted With Client Fraud, Business Law Today,
-

Vol. 12, Number 1, September/October 2002

- Co-Author: Screening Mechanisms: A Broader Application? Balancing Economic Realities and Ethical Obligations, Vol. 72, Temple Law Review 1023, 2000
 - *Lawyer Controlled MDPs: Critical to the Future Economic Vitality Of Our Profession*, American Bar Association Section of Environment Energy and Resources, Ethics Committee Newsletter, Vol. 1 No. 1, November 2000
 - Co-Author: *The Private Securities Litigation Reform Act of 1995; An Overview*, *The Barrister*, Vol. XXVII, No. 2, Fall, 1996
 - Co-Editor: *Commercial Litigation Case Notes*, *Pennsylvania Trial Lawyers Association*, 1985- 1995
 - Co-Author: *Time Out – A Time for Reflection on Statutes of Limitation in Federal Securities Laws and RICO Claims*, *The Barrister*, Vol. XVIII, No. 1, Spring 1987
 - Co-Author: *Getting Even, Litigation*, Vol. 13, No. 2, Winter, 1987
 - Book Review, *Newberg on Class Actions, (Second)*, *The Barrister*, Vol. XVI No. 4, Winter 1985/1986
 - Co-Author: *Mandamus Used as Pretrial Appeal*, *Pennsylvania Law Journal Reporter*, Vol. VI, No. 10, March 1983
 - Co-Author: *Derivative Action Requirements Eased*, *Pennsylvania Law Journal Reporter*, Vol. V., No. 46, December 1982
 - Co-Author: *Non-Parties May Recover Discovery Costs*, *Pennsylvania Law Journal Reporter*, Vol. V, No. 39, October 1982
 - *Action in Restraint of Trade: What Constitutes Conspiracy?*, *Pennsylvania Law Journal Reporter*, Vol. IV, No. 15, April 19814
 - *A Shot in the Arm for Dissenting Shareholders*, *The Philadelphia Lawyer*, Vol. 17, No. 2, March 1980
 - *The New Judicial Code as Part of Pennsylvania's Consolidated Statutes*, *The Philadelphia Lawyer*, Vol. 16, No. 2, June 1979
 - *Equal Fault Revisited*; *The Philadelphia Lawyer*, Vol. 14, No 4, December 1977
 - Co-Author: *Individual Issues in Securities Class Actions*, *The Philadelphia Lawyer*, Vol. 13, No. 3, October 1976
 - *United States v. Byrum: The Troubled Application of Section 2036*, Vol. 46, Temple Law Quarterly 498, 1973
-

LECTURES

- **American Association for Justice** (Formerly American Trial Lawyers Association): Commercial Litigation, 1986
- **American Bar Association**: Section of Business Law, *Client Fraud: To Disclose or Not to Disclose*, October 2002 (National Teleconference)
- **American Conference Institute Forum On Reduced Legal Costs**, The Ethics of Alternative Fee Arrangements and Cost Reduction Strategies, 2009
- **American Intellectual Property Law Association**: *Advanced Computer & Electronic Patent Practice Seminar, The Lawyers Duty of Disclosure – Ethics and Sarbanes-Oxley – The New Conundrum for Patent Attorneys*, Boston, June 2006
- **Berks County Bar Association**: Legal Ethics, 1993
- **Delaware Valley Corporate Counsel Association**: Legal Ethics, 1987
- **Dickinson Law School**: Intellectual Property Forum, Trade Secrets, 1983 and 1985
- **DuPont Chemical CLE Series**, Ethics and the Federal Circuit, September 2007
- **Federal Bar Association**: Federal Class Actions, 1986
- **Frankford's Rotary Club**: Legal Ethics, 1987
- **Intellectual Property Owners Association**: Annual Meeting “*Sarbanes-Oxley and the Duty of Disclosure for IP Lawyers*”, Seattle, September 2005
- **Lorman Seminars, Ethics Seminars**, 2013, 2014, 2015, 2016, 2017, 2019, 2020
- **Minnesota Institute of Legal Education**: Securities/Commercial Litigation, 1986;
- **Antitrust/Unfair Competition**, 1987; Securities/Commercial Litigation, 1989
- **Montgomery County Trial Lawyers Association**: Legal Ethics/Fee Disputes, 1991

- **Pennsylvania Association for Justice** (Formerly Pennsylvania Trial Lawyers Association)
 - Broker/Dealer Litigation, 1984;
 - Commercial Litigation Update, 1986-1989;
 - Antitrust/Health Care, 1989;
 - Legal Ethics/Professional Responsibility, 1992/1993 (Multiple Seminars);
 - Winning with Expert Testimony, April 2002;
 - “What’s It Worth” Seminar (Ethics Component), November 2002; March 2010
- **Pennsylvania Bar Association: Young Lawyers Section**, The Transition from Associate to Partner, 1986
- **Pennsylvania Bar Institute**
 - Directors and Officers Insurance, 1987;
 - Legal Ethics/Professional Responsibility, 1988;
 - Legal Ethics/Professional Responsibility – Bucknell University, 1992;
 - Legal Ethics/Professional Responsibility, 1993;
 - Alternative Dispute Resolution, 1994;
 - Legal Ethics/Professional Responsibility, 1997;
 - Alternative Dispute Resolution, 1997;
 - Recent Developments in Federal Practice/Federal Evidence, 1998;
 - The Ethics of Law Firm Governance, 2000;
 - Intellectual Property Issues for Business Lawyers, April 2002;
 - Accounting Litigation After Enron, WorldCom. (Ethics Component), November 2002;
 - Attorney Fees, June 2003;
 - My First Federal Court Trial, October 2004;
 - Tortious Interference in Business/Professional Relationships, August 2005;
 - Ethical Considerations in Litigating Employment Discrimination Cases, December 2005;
 - Best Practices in Pretrial Litigation in Federal Courts, 2012, 2013, 2014; 2015, 2016;
 - Annual Labor Law Update (Ethics Component) 2014;
 - Ethics And The Labor Lawyer, November 2016;
 - Plenary CLE Ethics Program, Business Law Institute, October 2019
- **Philadelphia Bar Association**
 - Bench Bar Conference, Commercial Litigation, 1979
 - Commercial Litigation, 1982
 - Professional Responsibility, 1983
 - Federal Bench Bar Conference, 2015
 - Client Confidentiality/Duty of Disclosure, 1985
 - Professional Responsibility Committee, May 2004; September 2004 (New Rules of Professional Conduct)
 - Federal Bench Bar Conference “The Rocket Docket”, 2005
- **Philadelphia Bar Education Center**
 - Legal Ethics/Solicitation, October 1992;
 - Legal Ethics/Pro Bono Representation, November 1992; November 1993
 - “Client Conflicts: Charting Safe Courses After Maritrans”, April 1993;
 - Legal Ethics: “Attorney/Accountant Ethical Clashes in the 90’s: How to Bridge the Gap”, January 1994;
 - Ethics of Pro Bono, 1992, 1994, 1996
- **Philadelphia Business Journal**, Roundtable: The Future of Law Firms (May 22-28, 2009)
- **Pennsylvania Law Journal-Reporter**: Antitrust Law Seminar, 1981 – Course Planner
- **Philadelphia Trial Lawyers Association**
 - Commercial Litigation, 1985
 - Legal Ethics/Fee Disputes, 1991
 - Legal Ethics/Trial Practice, 1997
 - Legal Ethics and Attorney Malpractice, 2016

- **Philadelphia Intellectual Property Law Association**
 - Legal Ethics and Professional Responsibility for the Intellectual Property Lawyer, 1996;
 - ADR in IP Cases, 2005;
 - IP Lawyers and the Duty of Disclosure under the Sarbanes-Oxley Act, May 2006;
 - Ethics, May 2010
- **Smithsonian Institution/American Association of Museums:** Legal Ethics: Who is the Client? – The Museum Board, Officers, Employee, or the “Public” - 2007
- **Temple University School of Law:** Legal Ethics, 1995; Rome Program, Visiting Professor, International Civil Litigation, June 2004; Legal Ethics and Social Media 2013; 2014
- **Third Circuit Judicial Conference:** Litigating Federal Civil Cases in the 21st Century: Changes and Challenges (Course Planner) 1997; Ethics in a Digital Age (Panelist), 2011
- **Thomson Reuters:** *Conflicts and Ethical Duties to Clients and the Public: Are They Reconcilable?*, Speaker, June 25, 2013
- **University of Akron School of Law,** Eighth Annual Richard C. Sughrue Symposium: The New Conundrum for Patent Lawyers: Sarbanes-Oxley, March 2006
- **University of Pennsylvania School of Law:** Social Media and Ethics, 2012
- **Villanova University School of Law:** Professional Responsibility, 1983

AWARDS

- Named as one of the Leading Litigation Attorneys in Pennsylvania, Chambers USA (2008 through 2024)
- Philadelphia Magazine Super Lawyers, “The Top Ten”, 2015/2016; “The Top 100”, 2006-2024
- Most Admired CEO Award by *Philadelphia Business Journal*, 2014
- Brandeis Society Community Achievement Award (Ben Levy), 2014
- Pennsylvania Bar Association, Award for Service as Co-Chair of Task Force on Code of Judicial Conduct, 2014
- Learned Hand Award, American Jewish Committee, 2012
- Temple University, Founder’s Day Award, 2009
- Wachovia Fidelity Award, 2007
- Fund for Religious Liberty Award, American Jewish Congress, 1997
- Outstanding Leadership Award by Pennsylvania Legal Services, 1996
- IOLTA Leadership Award, 1993
- Equal Justice Award by Community Legal Services, 1991

PERSONAL

- Born: April 17, 1949, Waterbury, Connecticut
 - Married: Sherri Engelman Reich
 - Children: Two sons, Spencer and Alexander
Daughters-in-Law, Elena Steiger Reich; Lea Michele Reich
Four grandchildren, Gabriella, Levi, Ever and Emery
-

Exhibit D

Francis Mailman Soumilas, P.C.
Profit and Loss Detail - Samson v. UnitedHealthcare Services, Inc.

All Dates

	Date	Transaction Type	Num	Name	Class	Memo/Description	Split	Amount	Balance
Ordinary Income/Expenses									
Expenses									
Cost Advancement									
Deposition / Video									
	11/21/2019	Expense		Summit Court Reporting	Credit Card	SUMMIT COURT REPORTING IN215-985-2400 NJ	Credit Card	2,376.40	2,376.40
	01/22/2020	Expense		Summit Court Reporting	Credit Card	SUMMIT COURT REPORTING IN215-985-2400 NJ	Credit Card	200.00	2,576.40
	04/20/2020	Expense		Summit Court Reporting	Credit Card	SUMMIT COURT REPORTING IN215-985-2400 NJ	Credit Card	3,386.94	5,963.34
	04/20/2020	Expense		Summit Court Reporting	Credit Card	SUMMIT COURT REPORTING IN215-985-2400 NJ	Credit Card	1,848.85	7,812.19
	06/23/2020	Expense		Summit Court Reporting	Credit Card	SUMMIT COURT REPORTING IN215-985-2400 NJ	Credit Card	3,250.50	11,062.69
	06/23/2020	Expense		Summit Court Reporting	Credit Card	SUMMIT COURT REPORTING IN215-985-2400 NJ	Credit Card	2,659.20	13,721.89
	08/18/2020	Expense			Credit Card	VERITEXT CORP LIVINGSTON NJ	Credit Card	1,349.03	15,070.92
	08/18/2020	Expense			Credit Card	VERITEXT CORP LIVINGSTON NJ	Credit Card	1,125.95	16,196.87
	11/25/2020	Expense			Credit Card	VERITEXT CORP LIVINGSTON NJ	Credit Card	1,577.30	17,774.17
	05/21/2024	Expense		U.S. Legal Support, Inc.	Credit Card	20240638632-13	Credit Card	700.00	18,474.17
	05/21/2024	Expense		U.S. Legal Support, Inc.	Credit Card	20240636256-13	Credit Card	866.20	19,340.37
	08/20/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	275.00	19,615.37
	08/20/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	200.00	19,815.37
	09/14/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	125.00	19,940.37
	09/14/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	200.00	20,140.37
	12/04/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	500.00	20,640.37
	12/24/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	1,150.00	21,790.37
	12/24/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	1,554.00	23,344.37
	12/24/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	1,350.00	24,694.37
	12/24/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	700.00	25,394.37
	12/24/2024	Expense		U.S. Legal Support, Inc.	Credit Card	US LEGAL 713-653-7100 TX	Credit Card	1,292.40	26,686.77
Total for Deposition / Video								\$ 26,686.77	
Expert Witness Fee									
	02/28/2019	Check	8326	Wireless Research Services, LLC		Retainer Fee	OLD MAIN CHECKING	4,000.00	4,000.00
	10/11/2019	Check	8613	Terrell Marshall Law Group PLLC		Our portion - Inv #1270 from Class Experts	OLD MAIN CHECKING	2,038.75	8,768.48
	10/24/2019	Check	8619	Terrell Marshall Law Group PLLC		Our portion - Inv #1286 from Class Experts	OLD MAIN CHECKING	730.00	9,498.48
	04/10/2020	Check	8777	Terrell Marshall Law Group PLLC			OLD MAIN CHECKING	5,000.00	14,498.48
	05/14/2020	Check	8796	Wireless Research Services, LLC		Inv. dated 5/13/2020	OLD MAIN CHECKING	1,650.00	16,148.48
	06/17/2020	Check	8829	Class Experts Group, LLC		see 6/10 email from Jen @ TM	OLD MAIN CHECKING	5,000.00	21,148.48
	06/17/2020	Check	8828	Ankura Consulting Group, LLC			OLD MAIN CHECKING	750.00	21,898.48
	02/10/2021	Check	9007	Class Experts Group, LLC			OLD MAIN CHECKING	3,333.33	25,231.81
	03/09/2021	Check	9029	Class Experts Group, LLC			OLD MAIN CHECKING	5,375.00	30,606.81
	10/25/2024	Check	3733	Class Experts Group, LLC			Current Main Checking	51,760.00	82,366.81
	11/25/2024	Check	3742	Class Experts Group, LLC			Current Main Checking	20,550.79	102,917.60

	Date	Transaction Type	Num	Name	Class	Memo/Description	Split	Amount	Balance
Total for Expert Witness Fee								\$ 100,187.87	
Fed Ex									
	10/01/2019	Expense					Credit Card	152.04	152.04
	12/03/2019	Expense			Credit Card	FEDEX 90223973 180-0463333 TN	Credit Card	35.35	187.39
	12/03/2019	Expense			Credit Card	FEDEX 90223973 180-0463333 TN	Credit Card	39.51	226.90
Total for Fed Ex								\$ 226.90	
Mediation									
	01/04/2024	Check	3523	Hillis Clark Martin & Peterson P.S.		Matter ID: 15999.774, Invoice Number: 295269	Current Main Checking	1,733.33	1,733.33
Total for Mediation								\$ 1,733.33	
Outside Copying Fees									
	07/21/2020	Expense		Reliable	Credit Card	RELIABLE COMPANIES 215-563-3363 PA	Credit Card	27.08	27.08
Total for Outside Copying Fees								\$ 27.08	
Pacer									
	09/05/2019	Expense			Credit Card	PACER800-676-6856IR xxxxxxxxxx0041 800-676-6856 TX	Credit Card	77.30	77.30
Total for Pacer								\$ 77.30	
Parking									
	09/20/2019	Check	8586	Jordan Sartell			OLD MAIN CHECKING	21.00	21.00
	02/13/2020	Expense			Credit Card	PPA PHL AIRPORT PHILADELPHIA PA	Credit Card	54.00	75.00
	02/15/2020	Expense			Credit Card	PPA PHL AIRPORT PHILADELPHIA PA	Credit Card	48.00	123.00
Total for Parking								\$ 123.00	
Pro Hac Vice									
	04/03/2019	Check	8370	Terrell Marshall Law Group PLLC	JS		OLD MAIN CHECKING	231.00	231.00
	04/03/2019	Check	8370	Terrell Marshall Law Group PLLC	JAF		OLD MAIN CHECKING	231.00	462.00
Total for Pro Hac Vice								\$ 462.00	
Tolls									
	09/20/2019	Check	8586	Jordan Sartell			OLD MAIN CHECKING	7.10	7.10
Total for Tolls								\$ 7.10	
Travel									
Airfare									
	08/29/2019	Expense			Credit Card	HTTP://WWW.GOGOAIR.COM	Credit Card	59.95	59.95
	08/29/2019	Expense			Credit Card	HTTP://WWW.GOGOAIR.COM	Credit Card	49.95	109.90
	08/29/2019	Expense			Credit Card	AMERICAN AIR0012375143062	Credit Card	1,138.00	1,247.90
	09/04/2019	Expense		Delta Airlines	Credit Card	DELTA AIR xxxxxxxx0828 xxxxxxxxxx0047 DELTA.COM CA	Credit Card	443.00	1,690.90
	09/04/2019	Expense			Credit Card	Viasat In-Flight Wi-Fi xxxxxxxxxx0049 888-6496711 CA	Credit Card	14.00	1,704.90
	09/05/2019	Expense			Credit Card	UNITED xxxxxxxx7390 xxxxxxxxxx0043 800-932-2732 TX	Credit Card	464.90	2,169.80
	09/05/2019	Expense			Credit Card	UA INFLT xxxxxxxx2106 xxxxxxxxxx0043 HOUSTON TX	Credit Card	11.99	2,181.79
	09/05/2019	Credit Card Credit		Delta Airlines			Credit Card	-443.00	1,738.79
	09/20/2019	Check	8586	Jordan Sartell			OLD MAIN CHECKING	8.00	1,746.79
	01/27/2020	Expense			Credit Card	ALASKA AIR 0272153611990SEATTLE WA	Credit Card	438.81	2,185.60
	01/27/2020	Expense			Credit Card	ALASKA AIR SEATTLE WA	Credit Card	89.00	2,274.60
	02/03/2020	Expense			Credit Card	ALASKA AIR 0272154261149SEATTLE WA	Credit Card	268.40	2,543.00
	02/07/2020	Expense			Credit Card	AMERICAN AIR0012114220607FORT WORTH TX	Credit Card	637.20	3,180.20
	02/07/2020	Expense			Credit Card	JAF	Credit Card	338.41	3,518.61

	Date	Transaction Type	Num	Name	Class	Memo/Description	Split	Amount	Balance
	02/12/2020	Expense			Credit Card	ALASKA WIFI BY GOGO 877-350-0038 IL	Credit Card	10.00	3,528.61
	02/12/2020	Expense			Credit Card	Viasat In-Flight Wi-Fi 888-6496711 CA	Credit Card	18.00	3,546.61
	02/13/2020	Expense			Credit Card	ALASKA WIFI BY GOGO 877-350-0038 IL	Credit Card	29.95	3,576.56
	02/13/2020	Expense			Credit Card	ALASKA WIFI BY GOGO 877-350-0038 IL	Credit Card	18.95	3,595.51
	02/14/2020	Expense			Credit Card	Viasat In-Flight Wi-Fi 888-6496711 CA	Credit Card	16.00	3,611.51
Total for Airfare								\$ 3,611.51	
Cabs									
	03/19/2019	Expense			Credit Card	UBER HELP.UBER.COM CA	Credit Card	20.10	20.10
	03/19/2019	Expense			Credit Card	UBER HELP.UBER.COM CA	Credit Card	13.82	33.92
	03/19/2019	Expense			Credit Card	UBER HELP.UBER.COM CA	Credit Card	5.00	38.92
	09/04/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	12.28	51.20
	09/04/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	16.62	67.82
	09/05/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	22.61	90.43
	09/05/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	22.23	112.66
	09/05/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	6.70	119.36
	09/06/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	7.79	127.15
	09/06/2019	Expense			Credit Card	UBER TRIP xxxxxxxxxx0046 HELP.UBER.COM CA	Credit Card	5.00	132.15
	09/18/2019	Expense			Credit Card	UBER TRIP	Credit Card	33.06	165.21
	09/19/2019	Expense			Credit Card	UBER TRIP	Credit Card	11.31	176.52
	09/19/2019	Expense			Credit Card	UBER TRIP	Credit Card	11.15	187.67
	09/19/2019	Expense			Credit Card	UBER TRIP	Credit Card	10.79	198.46
	09/20/2019	Expense			Credit Card	UBER TRIP	Credit Card	19.24	217.70
	09/23/2019	Expense			Credit Card	UBER TRIP	Credit Card	15.58	233.28
	11/06/2019	Expense			Credit Card	UBER TRIP HELP.UBER.COM CA	Credit Card	9.91	243.19
	01/01/2020	Expense			Credit Card	UBER TRIP HELP.UBER.COM CA	Credit Card	56.31	299.50
	02/11/2020	Expense			Credit Card	SQ *FORHIRE SEATTLE WA	Credit Card	48.30	347.80
	02/12/2020	Expense			Credit Card	SQ *YELLOW CAB CO San Bruno CA	Credit Card	24.84	372.64
	02/12/2020	Expense			Credit Card	UBER TRIP HELP.UBER.COM CA	Credit Card	16.99	389.63
	02/13/2020	Expense			Credit Card	UBER TRIP HELP.UBER.COM CA	Credit Card	35.02	424.65
	02/13/2020	Expense			Credit Card	UBER TRIP HELP.UBER.COM CA	Credit Card	38.49	463.14
	02/14/2020	Expense			Credit Card	UBER TRIP HELP.UBER.COM CA	Credit Card	56.65	519.79
Total for Cabs								\$ 519.79	
Car Rental									
	09/20/2019	Check	8586	Jordan Sartell			OLD MAIN CHECKING	133.55	133.55
Total for Car Rental								\$ 133.55	
Lodging									
	08/29/2019	Expense			Credit Card	HOTELSCOM8150655754293	Credit Card	131.67	131.67
	08/29/2019	Expense			Credit Card	CCI*HOTEL RESERVATION	Credit Card	197.46	329.13
	08/29/2019	Expense			Credit Card	HOTELBOOKINGSERVFEE	Credit Card	14.99	344.12
	08/29/2019	Expense			Credit Card	HOTELSCOM8007099006197	Credit Card	131.67	475.79
	01/27/2020	Expense			Credit Card	HOTELSCOM9211324882490 HOTELS.COM NV	Credit Card	637.49	1,113.28
	02/07/2020	Expense			Credit Card	HOTWIRE* HOTWIRE.COM WA	Credit Card	162.26	1,275.54
	02/07/2020	Expense			Credit Card	HOTWIRE* HOTWIRE.COM WA	Credit Card	80.55	1,356.09

	Date	Transaction Type	Num	Name	Class	Memo/Description	Split	Amount	Balance
	02/11/2020	Expense			Credit Card	HOTWIRE-SALES FINAL 866-468-9473 CA	Credit Card	291.75	1,647.84
	02/12/2020	Expense			Credit Card	THOMPSON SEATTLE F&B SEATTLE WA	Credit Card	739.87	2,387.71
	02/13/2020	Expense			Credit Card	KIMPTON ALEXIS HOTEL SEA SEATTLE WA	Credit Card	41.95	2,429.66
	02/13/2020	Expense			Credit Card	KIMPTON ALEXIS HOTEL SEA SEATTLE WA	Credit Card	50.86	2,480.52
	03/11/2020	Expense			Credit Card	KIMPTON HOTEL GEORGE WASHINGTON DC	Credit Card	6.60	2,487.12
	08/26/2020	Expense			Credit Card	HOTELSCOM9201702368271 HOTELS.COM WA	Credit Card	154.98	2,642.10
Total for Lodging								\$ 2,642.10	
Train									
	01/07/2020	Expense		Amtrak	Credit Card	AMTRAK - JUL0075081566582WASHINGTON DC	Credit Card	96.00	96.00
	01/08/2020	Credit Card Credit		Amtrak	Credit Card	AMTRAK .COM 0065092566036 WASHING CRED IT	Credit Card	-139.50	-43.50
	02/27/2020	Expense		Amtrak	Credit Card	AMTRAK MOBIL0580680603959WASHINGTON DC	Credit Card	122.00	78.50
	02/27/2020	Expense		Amtrak	Credit Card	AMTRAK MOBIL0580682606471WASHINGTON DC	Credit Card	80.00	158.50
	02/27/2020	Expense		Amtrak	Credit Card	AMTRAK MOBIL0580602512791WASHINGTON DC	Credit Card	61.00	219.50
	02/27/2020	Expense		Amtrak	Credit Card	AMTRAK POS F&B WASHINGTON DC	Credit Card	36.00	255.50
Total for Train								\$ 255.50	
Total for Travel								\$ 7,162.45	
Total for Cost Advancement								\$ 136,693.80	
Total for Expenses								\$ 136,693.80	

Exhibit 3

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FRANTZ SAMSON, a Washington resident,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**DECLARATION OF JONATHAN
SHUB IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS**

I, Jonathan Shub, declare as follows:

A. Background and experience.

1. I am a partner at Shub Johns & Holbrook, LLP ("Shub Johns & Holbrook"), co-counsel of record for plaintiff in this matter. I am admitted *pro hac vice* before this Court and am a member in good standing of the bars of the states of Pennsylvania, New Jersey, New York, California and the District of Columbia. I respectfully submit this declaration in support of Plaintiff's Motion for Attorneys' Fees and Costs. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. Shub Johns & Holbrook is a law firm headquartered in Conshohocken, Pennsylvania that focuses on complex commercial litigation with an eye towards consumer protection. Shub Johns & Holbrook's attorneys have been selected by courts and co-counsel to be lead counsel, or members of the executive committee of counsel in numerous class actions across the country. I have attached Shub Johns & Holbrook's firm resume as **Exhibit A** to this declaration.

3. I graduated *cum laude* in 1988 from Delaware Law School of Widener University (now Widener University School of Law). For the past several decades I have focused my practice on complex litigations with a specific emphasis on consumer rights.

4. I am recognized as one of the nation's leading class action consumer rights lawyers, based on my experience representing classes of individuals against well-known manufacturers of consumer products and consumer services, including Hewlett-Packard, Maytag, IBM and Palm. *Maximum PC* Magazine, a leading industry publication, said that "Shub is becoming renowned for orchestrating suits that have simultaneously benefited consumers and exposed buggy hardware." I also have experience in mass tort class actions such as Vioxx, and light tobacco litigation, and in consumer class actions arising out of energy deregulation.

5. I frequently lecture on cutting edge class action issues, and I am a past chairman of the Class Action Litigation Group of the American Association for Justice. I regularly appear in federal courts nationwide and have been appointed to leadership positions in complex cases involving deceptive advertising practices, defective products, and consumer fraud.

6. My team at Shub Johns & Holbrook and I have actively participated in this litigation, and at my previous firm, Kohn, Swift & Graf, P.C., where I was a shareholder, I had participated in this case since its inception. My firm will continue to commit the resources necessary to represent the class.

B. Qualifications of other Shub Johns & Holbrook attorneys.

7. The Shub Johns & Holbrook team working on this matter were me and Samantha E. Holbrook.

8. Samantha Holbrook is a partner at Shub Johns & Holbrook and has considerable experience in consumer litigation.

9. Ms. Holbrook was appointed as Co-Lead Counsel recently in a consumer class action data breach litigation pending in California in *In re F21 OPCO LLC Data Breach Litigation*, No. 2:2023-cv-07390 (CD Ca). She was also appointed as Plaintiff's Interim Co-Lead Counsel in

a consumer class action medical data breach litigation pending in Texas in *Lockhart et al., v El Centro Del Barrio d/b/a CentroMed*, No. 5:23-cv-01156 (WD Tx). Ms. Holbrook has also been appointed in the following data breach cases: *In re HealthEquity, Inc. Data Security Litig*, No. 2:24-cv-528 (D Utah) (appointed to serve on Plaintiffs' Executive Committee in medical data breach litigation currently pending in Utah); *Kostka v Dickey's Barbecue Restaurants, Inc.*, No. 3:20-cv-03424-K (ND Tex) (appointed as additional class counsel in data breach case that resulted in a \$2.35 million common fund settlement); *Krenk v Murfreesboro Medical Clinic, PA D/B/A Murfreesboro Medical Clinic & Surgicenter*, Case No. 75CC1-2023-CV-81005 (Rutherford Cir Ct) (appointed to the Plaintiffs' Steering Committee); *Doe v Highmark, Inc.*, No. 2:23-cv-00250 (W.D. Pa.) (ECF No. 29) (provisionally appointed as a member of the Plaintiffs' Executive Committee in this medical data breach litigation).

10. Additional information regarding Mr. Shub, Ms. Holbrook, and their firm can be found in the firm resume attached hereto as Exhibit A.

C. The prosecution of this case.

11. Shub Johns & Holbrook has advanced significant costs for and invested numerous hours into the investigation and prosecution of this case. We performed all of this work on a contingency basis without any guarantee that we would ever be paid. We will continue to commit the time and resources necessary to litigate the case and fairly and adequately represent and protect the interests of the Class.

12. A spreadsheet that compiles the contemporaneously maintained billing records of Shub and Johns's attorneys and staff is attached as **Exhibit B**. I have reviewed the billing records and audited them for duplicative or clerical work. These records show the firm has dedicated over 734 hours to prosecuting this case. Combined with the hours billed by our co-counsel for necessary work, I anticipate our lodestar will reflect a substantial negative multiplier.

13. The following table identifies the attorneys and staff members from Shub Johns & Holbrook who worked on this case and for whom the recovery of fees is sought. For each of the

timekeepers below I have stated the current hourly rate, the number of hours worked through January 29, 2025, and the total amount of fees. These time summaries are taken from contemporaneous, daily reports prepared and maintained by Shub Johns & Holbrook in the regular course of business.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Jonathan Shub Partner J.D. from Delaware Law School of Widener University, 1988	Assisted with case strategy; reviewed pleadings and discovery; worked on class certification reply brief; prepared for and attended mediations; assisted with depositions and hearings.	\$1,050	118.5	\$124,425.00
Samantha Holbrook Partner J.D. from Temple Univ. Beasley School of Law, 2011	Assisted with trial strategy; reviewed and edited briefs and pleadings; assisted with discovery; strategized about settlement and edited preliminary approval motion.	\$550	90.1	\$49,555.00
Andrea Bonner Associate J.D. from Villanova Univ. Charles Widger School of Law, 2021	Assisted with legal research and hearing preparation.	\$250	7.1	\$1,775.00
Diane Danois Contract Attorney J.D. from Delaware Law School, 1998	Reviewed and coded audio recordings and transcriptions.	\$400	223.0	\$89,200

DECLARATION OF JONATHAN SHUB IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS - 4 -
Case No. 2:19-cv-00175-MJP

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

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Melody Forrester Contract Attorney J.D. from Columbia University Law School, 1998	Reviewed and coded audio recordings and transcriptions.	\$400	270.0	\$108,000
Damian Gomez Legal Assistant 4 years legal experience	Conducted factual research and assisted with case management.	\$225	9.7	\$2,182.50
Christine Powers Paralegal 20 years legal experience	Prepared pleadings and processed document productions.	\$295	4.9	\$1,445.50
Grand Total:			723.3	\$376,583.00

14. Our firm has incurred approximately \$94,670.35 in out-of-pocket litigation costs. These costs include costs for experts, transcripts, filing fees, depositions, and other miscellaneous costs.

15. The following chart summarizes Shub and Johns's litigation costs:

Category of Expense	Total
Filing Fees	\$693.00
Expert Fees	\$93,787.87
Legal Research	\$189.48
Grand Total:	\$94,670.35

DECLARATION OF JONATHAN SHUB IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS - 5 -
Case No. 2:19-cv-00175-MJP

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1
2 16. I am proud of the settlement, which provides substantial individual awards for
3 Settlement Class members who submit claims. I wholly support it.
4

5 I declare under penalty of perjury under the laws of the State of Colorado and the United
6 States of America that the foregoing is true and correct.
7

8 EXECUTED at Aurora, Colorado and DATED this 14th day of March,
9 2025.

10
11 By: /s/ Jonathan Shub, Admitted Pro Hac Vice
12 Jonathan Shub, Admitted *Pro Hac Vice*
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Exhibit A



SHUB JOHNS & Holbrook LLP

Four Tower Bridge
200 Barr Harbor Drive
Suite 400
Conshohocken, PA 19428

610 477-8380
SHUBLAWYERS.COM
INFO@SHUBLAWYERS.COM



Jonathan Shub is a co-founder of Shub Johns & Holbrook LLP. Mr. Shub graduated from American University (Washington, D.C.), B.A., in 1983 and Delaware Law School of Widener University (now Widener University Delaware School of Law), cum laude, in 1988. While enrolled in Delaware Law School of Widener University, he served as the Law Review Articles Editor. Jon was a Wolcott Fellow Law Clerk to the Hon. Joseph T. Walsh, Delaware Supreme Court in 1988. He is a member of the American Association of Justice (past chairman of class action litigation section), the American Bar Association and the Consumer Attorneys of California. Jon was named a Pennsylvania SuperLawyer from 2005-2009 and 2012-2024. Jon is also an active member of his local synagogue and an avid political fundraiser.

Jonathan Shub is the founder of Shub Johns & Holbrook LLC. He is recognized as one of the nation's leading class action consumer rights lawyers, based on his 30 years representing classes of individuals and businesses in a vast array of matters involving unlawful conduct. He has gained notable attention in the area of defective consumer electronics and computer hardware as a result of many leadership positions in federal and state cases against companies such as Hewlett-Packard, Maytag, IBM and Palm. In fact, Maximum PC Magazine, a leading industry publication, said years back that "Shub is becoming renowned for orchestrating suits that have simultaneously benefited consumers and exposed buggy hardware." He also has vast experience in mass tort class actions such as Vioxx, light tobacco litigation, and in consumer class actions such as energy deregulation.

Jon was an editor of his school's law review and launched his career in the Washington office of Fried, Frank, Harris, Shriver & Jacobson, where he worked on complex commercial matters including corporate investigations and securities litigation. He then moved into a practice of consumer protection and advocacy, and was a partner in two prominent class actions firms (Seeger Weiss and Kohn, Swift & Graf) before launching his firm in 2020. He is a frequent lecturer on cutting edge class action issues, and is a past chairman of the Class Action Litigation Group of the American Association for Justice. Jon regularly appears in state and federal courts nationwide, and in many high profile consumer protection cases. Jon's leadership roles require him to develop the theories of liability for the entire class as well as the overall trial strategy for the cases. Jon was co-lead and co-trial counsel in a case in a federal court case against municipality for violation of a state privacy law. The trial resulted in a jury award of approximately \$68,000,000 to the Class. Most recently, he is co-lead counsel of a certified class against a hospital in Philadelphia for violating Philadelphia's Ban the Box law.

Jon's experience in class action litigation includes the following leadership positions:

Pugh et al. v. CHHS Hospital Company, LLC et al., No. 01768 (Phila. Ct. Common Pl.) (court certifies class of impacted individuals and grants preliminary approval of settlement in this class action alleging violation of the "Ban the Box Law." The Court's order appoints Jonathan Shub as co-lead Settlement Class Counsel);

Hasbrook v. EP Global Production Solutions, LLC, et al., Case No. 23STCV19711 (Cal. Super. Ct.) (Shub Johns & Holbrook LLP appointed as Co-lead Settlement

Class Counsel in a consumer class action data breach litigation in California);

Mercado v. Verde Energy USA, Inc., No. 18-cv-2068 (N.D. Ill. Aug. 18, 2021) (ECF No. 136) (court approved a settlement involving all individual residential consumers who enrolled in Verde Energy's variable rate electricity plan in connection with properties located in New York, Massachusetts, Illinois, New Jersey, Ohio or Pennsylvania arising out of allegations of deceptive advertising of residential energy practices);

Taha v. Bucks County., NO. 12-6867 (E.D. Pa. Apr. 29, 2019) (appointed as co-lead counsel in a national class action alleging the illegal publication of arrest records for thousands of individuals);

In re: AZEK Building Products Inc. Marketing and Sales Practices Litigation, MDL No. 2506, Civil Action No. 2:12-cv-06627-MCA-MAH, (D.N.J.) (ECF 219) (appointed as co-lead class counsel in settled national litigation against CPG International for deceptive advertising in connections with deceptive advertising of AZEK-branded decking products);

Tennille v. Western Union Company, No. 09-cv-00938 (D. Colo.) (ECF No. 175) (appointed as part of the executive committee counsel in settled national litigation against Western Union for deceptive practices in connection with money transfers);

In re Facebook PPC Advertising Litig., No. 09-cv-3043 (N.D. Cal.) (ECF No. 56) (appointed as co-lead class counsel and as a member of the Plaintiffs' Executive Committee in litigation against Facebook for deceptive advertising practices);

In re: Palm Treo 600 and 650 Litig., No. 05-cv-3774 (N.D. Cal.) (ECF No. 18) (appointed as co-lead counsel in a national class action involving defective smart phones); and

Austin v. Kiwi Energy NY, LLC, Index No. 515350/2017 (N.Y. Super. Kings Cty.) (ECF No. 66) (preliminarily approving class action settlement against KIWI Energy LLC for deceptive advertising of residential energy prices and appointing Mr. Shub as Class Counsel).

Pu lications and Presentations:

Moderator, Class Actions, Annual Meeting of American Association of Justice, 2015, 2016
 Speaker, Class Actions, Annual Meeting of American Association of Justice, 2015, 2016
 Speaker, "Finding the Right Class Action", New Jersey Association of Justice, June, 2016
 Speaker, "Nuts and Bolts of MDL Practice", Class Action Symposium, Chicago, Illinois, June, 2016

Speaker, Computer Technology and Consumer Products Class Actions", Consumer Attorneys of California 46th Annual Convention, November 2007

Frequent speaker, American Association for Justice (formerly ATLA)

Author, Distinguishing Individual from Derivative Claims in the Context of Battles for Corporate Control", 13 Del. J. Corp. L 579 (1998)

Author, “Shareholder Rights Plans Do They Render Shareholders Defenseless Against Their Own Management”, 12 Del J. Corp, L. 991 (1997)

Co-author, “Once Again, the Court Fails to Rein in RICO”, Legal Times (April 27, 1992)

Co-author, “Failed One-Share, One Vote Rule Let SEC Intrude in Boardroom”, National LawJournal (October 8, 1990).



Ben amin F. Johns, a co-founding partner at Shub Johns & Holbrook LLP, is a consumer protection advocate with two decades of litigation experience. He is admitted to practice in all of the state and federal courts in Pennsylvania and New Jersey, and has personally argued in the Third Circuit, D.C. Circuit, PA Supreme Court, and PA Commonwealth Court. Over the course of his career, Mr. Johns has taken and defended hundreds of depositions, argued and won dispositive motions (including contested motions for class certification), and been appointed to leadership positions by various courts across the country. He was recently described by the legal publication Law360 as being a “data breach specialist.” He was the lead litigator at his prior firm in a case against Apple which resulted in a \$50 million settlement and was the No. 1 ranked Consumer Fraud settlement in California for 2022 by TopVerdict.com.

Mr. Johns is currently serving as court-appointed co-lead counsel in several consumer data breach class actions, including *Bianucci v. Rite Aid Corporation*, No. 2:24-cv-3356-HB (E.D. Pa.); *Gravley, Sr. v. Fresenius Vascular Care, Inc.*, No. 2:24-cv-1148 (E.D. Pa.); *In re NCB Management Services, Inc. Data Breach Litig.*, No. 2:23-cv-1236-KNS (E.D. Pa.); *In re Geisinger Health Data Security Incident Litig.*, No. 4:24-cv-01071-MWB (M.D. Pa.); *In re Community Health Systems, Inc. Data Sec. Litig.*, No. 3:23-cv-00285 (M.D. Tenn.) (now part of MDL No. 3090); *Drugich v McLaren Health Care Corp*, No. 23-CV-12520 (E.D. Mich.); *Guarnaschelli et al. v. East River Medical Imaging, P.C.*, Index No. 656099/2023 (N.Y. Sup. Ct.); *Jay Kay Collision Center, Inc. v. CDK Global, LLC*, No. 1:24-cv-05313 (N.D. Ill.); and *Salinas et al. v. Southwest Louisiana Hospital Association, d/b/a Lake Charles Memorial Health System*, No. 20213-0090 D (La. J. D. Ct.). He is also interim co-lead counsel in *Zeiders v. Volkswagen Group of Am., Inc.*, No. 2:24-cv-11197-BRM-JSA (D.N.J.) and *Duffy v. Mazda Motor of Am.*, No. 3:24-CV-388-BJB (W.D. Ky.).

Over the course of his career, Mr. Johns has provided substantial assistance in the prosecution and resolution of the following cases:

In re CorrectCare Data Breach Litig., No. 5:22-319-DCR (E.D. Ky.) (Mr. Johns served as co-lead counsel in this case regarding a data breach at an entity that manages medical claims at certain correctional facilities, which ultimately resulted in a \$6.49 million settlement)

Nelson v. Connexin Software Inc. d/b/a Office Practicum, No. 2:22-cv-04676-JDW (E.D. Pa.) (Mr. Johns served as co-lead counsel in this data breach class action brought by pediatric patients against an electronic medical records vendor, which resulted in a \$4 million settlement)

In re R&B Corporation of Virginia d/b/a Credit Control Corporation, Data Security Breach Litig., No. 4:23-CV-66 (E.D. Va.) (Mr. Johns served as co-lead counsel in this data breach class action against a debt collection agency which resulted in a \$1.6 million settlement)

In re Wright & Filippis, LLC Data Security Breach Litigation, No. 2:22-cv-12908 (E.D. Mich.) (Mr. Johns served as co-lead counsel in this case involving a cyber security incident at a prosthetics and orthotics provider, which resulted in a \$2.9 million settlement)

In re Hope Coll. Data Sec. Breach Litig., No. 1:22-CV-01224-PLM (W.D. Mich.) (Mr. Johns was designated lead counsel in this data breach case against a private college in Michigan which resulted in a \$1.5 million settlement)

In re Onix Group, LLC Data Breach Litig., No. 23-2288-KSM (E.D. Pa.) (\$1.25 million common fund settlement); (Mr. Johns was designated co-lead counsel in this data breach case impacting consumer personal identifiable and private health information, resulting in a settlement valued at \$1.25 million).

In re Macbook Keyboard Litig., No. 5:18-cv-02813-EJD (N.D. Cal.) (Mr. Johns took and defended numerous depositions and successfully argued two motions to dismiss and co-argued plaintiffs' motion for class certification in this widely-covered case against Apple which ultimately settled for a \$50 million common fund. In granting final approval to the settlement, the district court wrote that plaintiffs' counsel "achieved excellent results for the class.")

Kostka v. Dickey's Barbecue Restaurants Inc., No. 3:20-CV-03424-K (N.D. Tex.) (Mr. Johns served as co-lead counsel in this consumer data breach case which resulted in a \$2.35 million common fund settlement)

Udeen v. Subaru of Am., Inc., No. 18-17334 (RBK/JS) (D.N.J.) (Mr. Johns was co-lead counsel in this consumer class action involving allegedly defective infotainment systems in certain Subaru automobiles, which resulted a settlement valued at \$6.25 million. At the hearing granting final approval of the settlement, the district court commented that the plaintiffs' team "are very skilled and very efficient lawyers They've done a nice job.")

Breneman v. Keystone Health, Case No. 2023-618 (Pa. Ct. Com. Pl.) (Mr. Johns was co-lead counsel in this medical data breach class action which resulted in a \$900,000 common fund settlement)

In re Nexus 6P Product Liability Litig., No. 5:17-cv-02185-BLF (N.D. Cal.) (Mr. Johns served as co-lead counsel and argued two of the motions to dismiss in this defective

smartphone class action. The case resulted in a settlement valued at \$9.75 million, which Judge Beth Labson Freeman described as “substantial” and an “excellent resolution of the case.”)

In re MyFord Touch Consumer Litig., No. 13-cv-03072-EMC (N.D. Cal.) (Mr. Johns served as court-appointed co-lead counsel in this consumer class action concerning allegedly defective MyFord Touch infotainment systems, which settled for \$17 million shortly before trial.)

Weeks v. Google LLC, 5:18-cv-00801-NC, 2019 U.S. Dist. LEXIS 215943, at 8-9 (N.D. Cal. Dec. 13, 2019) (Mr. Johns was co-lead counsel and successfully argued against a motion to dismiss in this defective smartphone class action. A \$7.25 million settlement was reached, which Magistrate Judge Nathanael M. Cousins described as being an “excellent result.”)

Gordon v. Chipotle Mexican Grill, Inc., No. 17-cv-01415-CMA-SKC (D. Colo.) (Mr. Johns served as co-lead counsel of behalf of a class of millions of cardholders who were impacted by a data breach at Chipotle restaurants. After largely defeating a motion to dismiss filed by Chipotle, the case resulted in a favorable settlement for affected consumers. At the final approval of the settlement, the district court noted that class counsel has “extensive experience in class action litigation, and are very familiar with claims, remedies, and defenses at issue in this case.”)

Hughes v. UGI Storage Co., 263 A.3d 1144 (Pa. 2021) (Mr. Johns argued this precedent-setting *de facto* takings matter before the Pennsylvania Supreme Court in October of 2021, which resulted in a 6-0 reversal of the underlying Commonwealth Court decision that had affirmed the trial court’s dismissal of the case)

Bray et al. v. GameStop Corp., 1:17-cv-01365-JEJ (D. Del.) (Mr. Johns served as co-lead counsel for consumers affected by a data breach at GameStop. After largely defeating a motion to dismiss, the case was resolved on favorable terms that provided significant relief to GameStop customers. At the final approval hearing, the District Judge found the settlement to be “so comprehensive that really there’s nothing else that I need developed further,” that “the settlement is fair,” “reasonable,” and “that under the circumstances it is good for the members of the class under the circumstances of the claim.”)

In re: Elk Cross Timbers Decking Marketing, Sales Practices and Products Liability Litig., No. 15-cv-18-JLL-JAD (D.N.J.) (Mr. Johns served on the Plaintiffs’ Steering Committee in this MDL proceeding, which involved allegedly defective wood-composite decking, and which ultimately resulted in a \$20 million settlement.)

In re Checking Account Overdraft Litig., No. 1:09-MD-02036-JLK (S.D. Fla.) (Mr. Johns was actively involved in these Multidistrict Litigation proceedings, which involve allegations that dozens of banks reorder and manipulate the posting order of debit transactions. Settlements collectively in excess of \$1 billion were reached with several

banks. Mr. Johns was actively involved in prosecuting the actions against U.S. Bank (\$55 million settlement) and Comerica Bank (\$14.5 million settlement.).

Physicians of Winter Haven LLC, d/b/a Day Surgery Center v. STERIS Corporation, No. 1:10-cv-00264-CAB (N.D. Ohio) (Mr. Johns was the primary associate working on this case which resulted in a \$20 million settlement on behalf of hospitals and surgery centers that purchased a sterilization device that allegedly did not receive the required pre-sale authorization from the FDA.)

West v. ExamSoft Worldwide, Inc., No. 14-cv-22950-UU (S.D. Fla.) (Mr. Johns was co-lead counsel in this case which resulted in a \$2.1 million settlement on behalf of July 2014 bar exam applicants in several states who paid to use software for the written portion of the exam which allegedly failed to function properly)

Henderson v. Volvo Cars of North America, LLC, No. 2:09-cv-04146-CCC-JAD (D. N.J.) (provided substantial assistance in this consumer automobile case that settled after the plaintiffs prevailed, in large part, on a motion to dismiss)

In re Marine Hose Antitrust Litig., No. 08-MDL-1888 (S.D. Fla.) (settlements totaling nearly \$32 million on behalf of purchasers of marine hose.)

In re Philips/Magnavox Television Litig., No. 2:09-cv-03072-CCC-JAD (D. N.J.) (settlement in excess of \$4 million on behalf of consumers whose flat screen televisions failed due to an alleged design defect. Mr. Johns argued against one of the motions to dismiss.)

Allison, et al. v. The GEO Group, No. 2:08-cv-467-JD (E.D. Pa.), and *Kurian v. County of Lancaster*, No. 2:07-cv-03482-PD (E.D. Pa.) (settlements totaling \$5.4 million in two civil rights class action lawsuits involving allegedly unconstitutional strip searches at prisons)

Mr. Johns was elected by fellow members of the Philadelphia Bar Association to serve a three-year term on the Executive Committee of the organization's Young Lawyers Division. He also served on the Editorial Board of the Philadelphia Bar Reporter and the Board of Directors for the Dickinson School of Law Alumni Society. Mr. Johns has been published in the Philadelphia Lawyer magazine and the Philadelphia Bar Reporter. While in college, Mr. Johns was on the varsity basketball team and spent a semester studying abroad in Osaka, Japan. He graduated from Harriton High School in 1998 as the then all-time leading scorer in the history of the boys' basketball program. Ben has been named a "Lawyer on the Fast Track" by The Legal Intelligencer, a "Top 40 Under 40" attorney by The National Trial Lawyers, and a Pennsylvania "Rising Star"/"Super Lawyer."

ducation

Penn State Dickinson School of Law, J.D., 2005 Woolsack Honor Society

Penn State Harrisburg, M.B.A., 2004 Beta Gamma Sigma Honor Society

Washington and Lee University, B.S., 2002 *cum laude*

Kansai Gaidai University, Osaka Prefecture, Japan (studied abroad during 2000-2001 semester)

Executive Committee, Young Lawyers Division of the Philadelphia Bar Association

Board Member, The Dickinson School of Law Alumni Society

Editorial Board, Philadelphia Bar Reporter 2013-16

Former Member, Washington and Lee Alumni Admissions Program

Admissions

United States Court of Appeals for the Third Circuit

United States Court of Appeals for the Fifth Circuit

United States Court of Appeals for the Sixth Circuit

United States Court of Appeals for the Ninth Circuit

United States Court of Appeals for the District of Columbia Circuit

United States District Court for the Eastern District of Pennsylvania

United States District Court for the Middle District of Pennsylvania

United States District Court for the Western District of Pennsylvania

United States District Court for the District of New Jersey

United States District Court for the District of Colorado

United States District Court for the Northern District of Illinois

United States District Court for the Central District of Illinois

United States District Court for the Eastern District of Michigan

United States District Court for the Western District of Michigan

United States District Court for the Eastern District of Wisconsin

United States Court of Federal Claims

Supreme Court of Pennsylvania

Supreme Court of New Jersey

Memberships and Associations

Named a "Lawyer on the Fast Track" by *The Legal Intelligencer*

Named to the Pennsylvania “Rising Stars” List from Super Lawyers: 2010-Present

Recognized as a “Top 40 Under 40” lawyer by The National Trial Lawyers

Member of the Delaware County Bar Association

Samantha Holbrook, a co-founding partner of Shub Johns & Holbrook LLP, has extensive experience in consumer protection class action litigation. Prior to joining the firm, Ms. Holbrook practiced at two different national class action law firms where she represented consumers and investors in nationwide class actions. Ms. Holbrook has experience handling and litigating all aspects of the prosecution of national class action litigation asserting claims under state and federal law challenging predatory lending practices, product defects, breach of fiduciary duty, antitrust claims, consumer fraud and unfair and deceptive acts and practices in federal courts throughout the country.



Ms. Holbrook has also obtained favorable recoveries on behalf of multiple nationwide classes of borrowers whose insurance was force-placed by their mortgage services.

Ms. Holbrook received her law degree from Temple University Beasley School of Law. While in law school, she served as the President of the Moot Court Honor Society and President of the Student Animal Legal Defense Fund. She was also a member of Temple’s nationally recognized Trial Team. Upon graduating, she served as an adjunct professor for Temple coaching its Trial Team from 2013-2018. Ms. Holbrook received her undergraduate degrees from the Pennsylvania State University in Political Science and Spanish. While in college, Ms. Holbrook spent a semester studying abroad in Sevilla, Spain. She is proficient in Spanish. Ms. Holbrook also currently serves as the Board President for Citizens for a No-Kill Philadelphia, a Philadelphia-based animal welfare advocacy organization, and serves on the Board of Directors of City of Elderly Love, a senior-focused animal rescue organization.

Ms. Holbrook has been recognized by Pennsylvania Super Lawyers as a Rising Star for each year from 2020-2024. She has also been recognized as a Top Young Rising Attorney in Pennsylvania in 2020, and a Pennsylvania & Delaware Top Attorneys Rising Stars in 2021. She is admitted to practice in all federal and state courts in Pennsylvania and New Jersey.

Over the course of her career, Ms. Holbrook has provided substantial assistance in the prosecution of the following cases:

In re HealthEquity, Inc. Data Security Incident Litigation, No. 2:2024-cv-00528 (D. Utah.) (appointed to serve on Plaintiff’s Executive Committee in a consumer class action medical data breach litigation pending in Utah);

Reichbart v. Financial Business and Consumer Solutions, Inc., No. 24-cv-1876 (E.D. Pa.) (ECF No. 23) (appointing Ms. Holbrook as Liaison Counsel in data breach class action);

In re F21 OPCO LLC Data Breach Litigation, No. 2:2023-cv-07390 (C.D. Ca.) (appointed as Plaintiffs' Co-lead Counsel in a consumer class action data breach litigation pending in California);

Lockhart et al., v. El Centro Del Barrio d/b/a CentroMed, No. 5:23-cv-01156 (W.D. Tx.) (appointed as Plaintiff's Interim Co-Lead Counsel in a consumer class action medical data breach litigation pending in Texas);

Krenk v. Murfreesboro Medical Clinic, P.A. D/B/A Murfreesboro Medical Clinic & Surgicenter, Case No. 75CC1-2023-CV-81005 (Rutherford Cir. Ct.) (appointed to the Plaintiffs' Steering Committee in a consumer class action medical data breach litigation pending in Tennessee);

Doe v. Highmark, Inc., No. 2:23-cv-00250 (W.D. Pa.) (provisionally appointed as a member of the Plaintiffs' Executive Committee in this medical data breach litigation pending in Pennsylvania);

Suarez v. Nissan North America, No. 3:21-cv-00393 (M.D. Tenn.) (appointed lead class counsel in a consumer class action alleging defective headlamps in Nissan Altima vehicles which reached a settlement valued at over \$50 million that provides reimbursements, free repairs, and an extended warranty);

Kostka v. Dickey's Barbecue Restaurants, Inc., No. 3:20-cv-03424-K (N.D. Tex.) (appointed as additional interim class counsel on behalf of consumers whose sensitive payment card information was exposed in a data breach at Dickey's restaurant chains);

In re Wawa, Inc. Data Security Litig., No. 2:19-cv-06019-GEKP (E.D. Pa.) (achieved \$12 million settlement on behalf of consumers whose sensitive payment card information was exposed to criminals as part of a highly-publicized data breach);

Lacher et al v. Aramark Corp., 2:19-cv-00687 (E.D. Pa. 2019) (represented a class of Aramark's current and former managers alleging that Aramark breached its employment contracts by failing to pay bonuses and restricted stock unit compensation to managers nationwide);

Turner v. Sony Interactive Entertainment LLC, No. 4:21-cv-02454-DMR (N.D. Cal.) (class action lawsuit alleging that Sony's PlayStation 5 DualSense Controller suffers from a "drift defect" that results in character or gameplay moving on the screen without user command or manual operation of the controller thereby compromising its core functionality);

Board of Trustees of the AFTRA Retirement Fund, et al. v. JPMorgan Chase Bank, N.A., 09-CV-686 (SAS), 2012 WL 2064907 (S.D.N.Y. June 7, 2012) (approving \$150 million settlement); and

In re 2008 Fannie Mae ERISA Litigation, Case No. 09-cv-1350 (S.D.N.Y.) (\$9 million settlement on behalf of participants in the Federal National Mortgage Association Employee Stock Ownership Plan).



Andrea Bonner is an **associate attorney** at Shub Johns & Holbrook LLP. She received her law degree from the Villanova University Charles Widger School of Law where she wrote for the Environmental Law Journal. Following graduation, she clerked for the Honorable Judge Pereksta of the New Jersey Superior Court. She then practiced Labor and Employment law at a regional mid-sized firm that is headquartered in Philadelphia. During this time, Andrea became interested in plaintiff work and the ability to advocate for clients no matter their background or circumstances. Andrea is an enthusiastic member of the Shub Johns & Holbrook team and looks forward to working alongside her colleagues on Class Action claims.

Damian Gome joined Shub Johns & Holbrook LLP in March 2022 and is currently positioned as a **Legal Assistant** and **Consumer Communications Specialist** with the firm. Damian graduated from the University of Texas at Austin in 2021 with a Bachelor's degree in History with a focus on Classical Studies, as well as a Certificate in Creative Writing. Damian's prior professional experiences include building relationship and communication skills with clientele while working as an Intake Specialist at Filevine, a legal software company. Various courses in copywriting and email marketing have alike prepared him for his initial role as intake paralegal at Shub Johns & Holbrook.



Damian's current responsibilities include conducting widespread investigations and initial research into potential class action and consumer protection cases, interviewing and vetting potential clients and class representatives, and assisting in legal projects as necessary. Aside from legal assistance, Damian manages Shub Johns & Holbrook's Marketing and Outreach ventures, writes for and oversees the Shub Johns & Holbrook's website content, and runs Shub Johns & Holbrook's social media accounts.



Christine Powers is a **Senior Paralegal** with Shub Johns & Holbrook LLP. She has over 25 years of legal experience supporting attorneys in all aspects of the litigation process in jurisdictions nationwide. Before joining Shub Johns & Holbrook in September 2024, Christine worked on complex litigation matters, including areas of corporate governance and mergers and acquisitions, for over 15 years at a large plaintiffs' class action law firm. Christine graduated with a bachelor's degree in communications from LaSalle University.

Exhibit B

Samson v. UnitedHealthcare Services

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6/1/2020	Jonathan Shub	Review discovery	4.0	\$1,050.00	\$4,200.00
6/10/2020	Jonathan Shub	Discussion of class cert/prepare for same	2.0	\$1,050.00	\$2,100.00
6/14/2020	Jonathan Shub	Research/Draft 23(a)(4) reply	6.0	\$1,050.00	\$6,300.00
6/15/2020	Jonathan Shub	draft reply	8.0	\$1,050.00	\$8,400.00
6/16/2020	Jonathan Shub	Draft and research for class cert reply	12.0	\$1,050.00	\$12,600.00
8/9/2023	Samantha Holbrook	Preparation for mediation	0.2	\$550.00	\$110.00
8/9/2023	Jonathan Shub	Preparation for mediation	4.5	\$1,050.00	\$4,725.00
8/10/2023	Samantha Holbrook	Preparing for/participating in mediation	3.6	\$550.00	\$1,980.00
8/10/2023	Samantha Holbrook	Participating in mediation	5.0	\$550.00	\$2,750.00
8/10/2023	Jonathan Shub	Participating in mediation	8.5	\$1,050.00	\$8,925.00
8/10/2023	Jonathan Shub	Review class cert order; research on same	3.5	\$1,050.00	\$3,675.00
10/12/2023	Damian Gomez	drafting class cert/ jon appointment post	0.5	\$225.00	\$112.50
10/13/2023	Samantha Holbrook	Analyzing class certification opinion	0.1	\$550.00	\$55.00
10/13/2023	Andrea Bonner	Internal emails re. class certification.	0.4	\$250.00	\$100.00
10/13/2023	Andrea Bonner	Reviewed Court's decision re. class cert.	0.4	\$250.00	\$100.00
10/13/2023	Samantha Holbrook	Analyzing class certification opinion	1.5	\$550.00	\$825.00
10/13/2023	Jonathan Shub	Class Cert Hearing; Research on same	7.0	\$1,050.00	\$7,350.00
10/16/2023	Samantha Holbrook	Participating in call with co-counsel concerning class certification	0.7	\$550.00	\$385.00
10/17/2023	Jonathan Shub	Review notices from PillPack	2.5	\$1,050.00	\$2,625.00
10/17/2023	Jonathan Shub	RFPs to Notice Vendor	1.5	\$1,050.00	\$1,575.00
10/19/2023	Samantha Holbrook	Emails concerning meet and confer scheduling	0.1	\$550.00	\$55.00
10/19/2023	Samantha Holbrook	Emails with co-counsel concerning class certification	0.2	\$550.00	\$110.00
10/19/2023	Jonathan Shub	Emails with co-counsel concerning class certification	1.2	\$1,050.00	\$1,260.00
10/20/2023	Jonathan Shub	Review notices; finalize and sent to co-counsel	2.5	\$1,050.00	\$2,625.00
10/23/2023	Samantha Holbrook	Meet and confer with defense counsel concerning class notice	1.3	\$550.00	\$715.00
10/24/2023	Samantha Holbrook	Emails with co-counsel concerning class notice admin bids	0.3	\$550.00	\$165.00
10/25/2023	Samantha Holbrook	Emails concerning notice administrator and class composition; discussions concerning same	0.4	\$550.00	\$220.00
10/25/2023	Jonathan Shub	Emails concerning notice administrator and class composition; discussions concerning same	1.5	\$1,050.00	\$1,575.00
10/30/2023	Samantha Holbrook	Emails and discussions concerning notice and class vendor	0.2	\$550.00	\$110.00
11/6/2023	Jonathan Shub	Review edits to 23(f) petitions	2.5	\$1,050.00	\$2,625.00
11/17/2023	Samantha Holbrook	Emails concerning pleadings	0.5	\$550.00	\$275.00
11/17/2023	Jonathan Shub	Emails concerning pleadings	0.5	\$1,050.00	\$525.00

Samson v. UnitedHealthcare Services

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11/22/2023	Jonathan Shub	Edits to BMS brief; research on same	4.5	\$1,050.00	\$4,725.00
11/27/2023	Samantha Holbrook	Editing response to MTD	0.4	\$550.00	\$220.00
12/27/2023	Samantha Holbrook	Emails with co-counsel; analyzing proposed notice language	0.5	\$550.00	\$275.00
12/28/2023	Samantha Holbrook	Emails concerning stay; strategy discussions with co-counsel	0.5	\$550.00	\$275.00
1/4/2024	Jonathan Shub	M/C on class cert issues; prepare for same	1.5	\$1,050.00	\$1,575.00
1/11/2024	Samantha Holbrook	Emails concerning protective order	0.2	\$550.00	\$110.00
1/15/2024	Samantha Holbrook	Emails and discussions concerning joint status report; reviewing joint status report	0.2	\$550.00	\$110.00
1/29/2024	Samantha Holbrook	Emails concerning subpoena	0.2	\$550.00	\$110.00
2/19/2024	Samantha Holbrook	Reviewing motion to dismiss briefing for purposes of oral argument prep	0.7	\$550.00	\$385.00
2/20/2024	Samantha Holbrook	Call with co-counsel to discuss discovery; preparing for/participating in moot for MTD argument	3.7	\$550.00	\$2,035.00
2/20/2024	Andrea Bonner	Prepared for and attended session to moot co-counsel in anticipation of oral argument scheduled for 2/21/2024.	1.8	\$250.00	\$450.00
2/21/2024	Andrea Bonner	Attended oral argument re. MTD for lack of personal jurisdiction.	0.7	\$250.00	\$175.00
3/1/2024	Andrea Bonner	Reviewed order denying Defendant's motion to dismiss.	0.6	\$250.00	\$150.00
3/8/2024	Samantha Holbrook	Emails and discussions concerning discovery efforts and review projects	0.5	\$550.00	\$275.00
3/19/2024	Samantha Holbrook	Call with co-counsel to discuss discovery project	1.0	\$550.00	\$550.00
3/20/2024	Samantha Holbrook	Emails and discussions concerning discovery review project	0.3	\$550.00	\$165.00
3/22/2024	Samantha Holbrook	Call to discuss discovery review project	0.9	\$550.00	\$495.00
3/22/2024	Samantha Holbrook	Discovery call with co-counsel	0.9	\$550.00	\$495.00
3/22/2024	Diane Danois	Conference call; review protocols; review support documents; DISCO document review.	4.0	\$400.00	\$1,600.00
3/23/2024	Diane Danois	DISCO document review.	5.5	\$400.00	\$2,200.00
3/24/2024	Diane Danois	DISCO document review.	5.0	\$400.00	\$2,000.00
3/25/2024	Diane Danois	DISCO document review.	4.5	\$400.00	\$1,800.00
3/26/2024	Melody Forrester	Review and code UnitedHealth audio call files.	5.0	\$400.00	\$2,000.00
3/26/2024	Diane Danois	DISCO document review.	7.0	\$400.00	\$2,800.00
3/27/2024	Diane Danois	DISCO document review.	5.5	\$400.00	\$2,200.00
3/27/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
3/28/2024	Diane Danois	DISCO document review.	4.0	\$400.00	\$1,600.00
3/28/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
3/29/2024	Diane Danois	DISCO document review.	2.5	\$400.00	\$1,000.00
3/29/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00

Samson v. UnitedHealthcare Services

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3/30/2024	Diane Danois	DISCO document review.	1.0	\$400.00	\$400.00
3/30/2024	Melody Forrester	Review and code audio call files.	5.0	\$400.00	\$2,000.00
3/30/2024	Melody Forrester	Review and code audio call files; review updated coding instructions.	3.0	\$400.00	\$1,200.00
3/31/2024	Diane Danois	DISCO document review.	6.5	\$400.00	\$2,600.00
4/1/2024	Samantha Holbrook	Emails concerning document review; review of potentially hot documents	0.3	\$550.00	\$165.00
4/1/2024	Melody Forrester	Review and code audio call files.	5.0	\$400.00	\$2,000.00
4/1/2024	Diane Danois	DISCO Document Review.	3.0	\$400.00	\$1,200.00
4/2/2024	Andrea Bonner	Communicated with S. Holbrook re. status of doc. review.	0.1	\$250.00	\$25.00
4/2/2024	Damian Gomez	team meeting; case update	0.1	\$225.00	\$22.50
4/2/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/3/2024	Samantha Holbrook	Editing Joint Status Report; preparing for team call to discuss strategy	0.5	\$550.00	\$275.00
4/3/2024	Samantha Holbrook	Call with co-counsel to discuss case strategy and discovery	0.5	\$550.00	\$275.00
4/3/2024	Melody Forrester	Review and code audio call files.	3.0	\$400.00	\$1,200.00
4/3/2024	Diane Danois	DISCO Document Review.	6.0	\$400.00	\$2,400.00
4/4/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
4/4/2024	Diane Danois	DISCO Document Review.	5.5	\$400.00	\$2,200.00
4/5/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
4/6/2024	Melody Forrester	Review and code audio call files.	5.0	\$400.00	\$2,000.00
4/6/2024	Diane Danois	DISCO Document Review.	1.0	\$400.00	\$400.00
4/7/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
4/7/2024	Diane Danois	DISCO Document Review.	7.5	\$400.00	\$3,000.00
4/8/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
4/8/2024	Diane Danois	DISCO Document Review.	5.5	\$400.00	\$2,200.00
4/9/2024	Damian Gomez	firm meeting re: case update	0.1	\$225.00	\$22.50
4/9/2024	Damian Gomez	call with Andie re: legal research and memo formatting; emails on the same	0.1	\$225.00	\$22.50
4/9/2024	Damian Gomez	reviewing emails from Sam re: research project for avaya dialer; research into same	0.7	\$225.00	\$157.50
4/9/2024	Andrea Bonner	Call re. research issue.	0.4	\$250.00	\$100.00
4/9/2024	Andrea Bonner	Communicated internally re. status.	0.1	\$250.00	\$25.00
4/9/2024	Diane Danois	DISCO Document Review; Team Meeting.	5.0	\$400.00	\$2,000.00
4/10/2024	Melody Forrester	Review and code audio call files.	4.0	\$400.00	\$1,600.00
4/10/2024	Diane Danois	DISCO Document Review.	2.0	\$400.00	\$800.00
4/11/2024	Damian Gomez	reviewing research material re: avaya dialer	1.0	\$225.00	\$225.00

Samson v. UnitedHealthcare Services

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4/11/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/11/2024	Diane Danois	DISCO Document Review.	3.0	\$400.00	\$1,200.00
4/12/2024	Samantha Holbrook	Analyzing defense counsel's edits to joint status report; preparing for/participating in call with defense counsel concerning joint status report	2.3	\$550.00	\$1,265.00
4/12/2024	Damian Gomez	research and reviewing Avaya Dialer information; drafting memo	2.0	\$225.00	\$450.00
4/12/2024	Damian Gomez	emails with cocounsel, Jodi; call re: avaya dialer research project	0.3	\$225.00	\$67.50
4/12/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/12/2024	Diane Danois	DISCO Document Review.	5.5	\$400.00	\$2,200.00
4/13/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
4/13/2024	Diane Danois	DISCO Document Review.	5.5	\$400.00	\$2,200.00
4/14/2024	Diane Danois	DISCO Document Review.	7.0	\$400.00	\$2,800.00
4/15/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
4/15/2024	Diane Danois	DISCO Document Review.	4.0	\$400.00	\$1,600.00
4/16/2024	Damian Gomez	team meeting re: case update and further Avaya research conversation	0.1	\$225.00	\$22.50
4/16/2024	Melody Forrester	Review and code audio call files.	5.0	\$400.00	\$2,000.00
4/16/2024	Diane Danois	DISCO Document Review.	6.0	\$400.00	\$2,400.00
4/17/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/17/2024	Diane Danois	DISCO Document Review.	6.0	\$400.00	\$2,400.00
4/18/2024	Damian Gomez	Avaya dialer research	2.0	\$225.00	\$450.00
4/18/2024	Damian Gomez	follow up email with Jen Murray and Sam about avaya dialer research	0.3	\$225.00	\$67.50
4/18/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/18/2024	Diane Danois	DISCO Document Review.	4.5	\$400.00	\$1,800.00
4/19/2024	Diane Danois	DISCO Document Review.	6.5	\$400.00	\$2,600.00
4/20/2024	Diane Danois	DISCO Document Review.	3.5	\$400.00	\$1,400.00
4/22/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
4/22/2024	Diane Danois	DISCO Document Review.	5.5	\$400.00	\$2,200.00
4/23/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
4/24/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
4/25/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/26/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
4/27/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
4/28/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
4/29/2024	Melody Forrester	Review and code audio call files.	2.0	\$400.00	\$800.00

Samson v. UnitedHealthcare Services

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5/6/2024	Melody Forrester	Review and code audio call files.	4.0	\$400.00	\$1,600.00
5/7/2024	Diane Danois	DISCO Document Review.	2.0	\$400.00	\$800.00
5/7/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
5/8/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
5/8/2024	Diane Danois	DISCO Document Review.	5.0	\$400.00	\$2,000.00
5/9/2024	Melody Forrester	Review and code audio call files.	6.0	\$400.00	\$2,400.00
5/9/2024	Diane Danois	DISCO Document Review.	6.0	\$400.00	\$2,400.00
5/10/2024	Melody Forrester	Review and code audio call files.	10.0	\$400.00	\$4,000.00
5/10/2024	Diane Danois	DISCO Document Review.	3.0	\$400.00	\$1,200.00
5/11/2024	Melody Forrester	Review and code audio call files.	9.0	\$400.00	\$3,600.00
5/11/2024	Diane Danois	DISCO Document Review.	3.5	\$400.00	\$1,400.00
5/12/2024	Melody Forrester	Review and code audio call files.	7.0	\$400.00	\$2,800.00
5/12/2024	Diane Danois	DISCO Document Review.	7.0	\$400.00	\$2,800.00
5/13/2024	Diane Danois	DISCO Document Review.	4.5	\$400.00	\$1,800.00
5/14/2024	Diane Danois	DISCO Document Review.	2.0	\$400.00	\$800.00
5/15/2024	Samantha Holbrook	Emails and discussions concerning deposition of defense witness	0.3	\$550.00	\$165.00
5/15/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
5/15/2024	Diane Danois	DISCO Document Review.	4.0	\$400.00	\$1,600.00
5/16/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
5/16/2024	Diane Danois	DISCO Document Review.	3.0	\$400.00	\$1,200.00
5/17/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
5/19/2024	Melody Forrester	Review and code audio call files.	8.0	\$400.00	\$3,200.00
5/19/2024	Diane Danois	DISCO Document Review.	4.0	\$400.00	\$1,600.00
5/21/2024	Diane Danois	DISCO Document Review.	3.0	\$400.00	\$1,200.00
5/22/2024	Melody Forrester	Review and code audio call files.	2.0	\$400.00	\$800.00
5/22/2024	Diane Danois	DISCO Document Review.	1.5	\$400.00	\$600.00
5/23/2024	Diane Danois	DISCO Document Review.	4.0	\$400.00	\$1,600.00
5/25/2024	Diane Danois	DISCO Document Review.	5.0	\$400.00	\$2,000.00
5/28/2024	Andrea Bonner	Communicated internally re. review of audio batches.	0.1	\$250.00	\$25.00
6/11/2024	Andrea Bonner	Communicated internally re. discovery issues.	0.1	\$250.00	\$25.00
6/21/2024	Samantha Holbrook	Update call with co-counsel	0.8	\$550.00	\$440.00
6/25/2024	Samantha Holbrook	Co-counsel call to discuss discovery and related issues	0.9	\$550.00	\$495.00
6/25/2024	Damian Gomez	team meeting: re status of case	0.1	\$225.00	\$22.50
7/3/2024	Damian Gomez	downloading produced Def files; sharing with Jon and Sam	0.2	\$225.00	\$45.00

Samson v. UnitedHealthcare Services

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7/10/2024	Samantha Holbrook	Preparing for/participating in weekly status call with co-counsel	1.9	\$550.00	\$1,045.00
7/12/2024	Samantha Holbrook	Call with co-counsel to discuss case strategy	0.5	\$550.00	\$275.00
7/15/2024	Damian Gomez	emails with Sam about class distribution list	0.3	\$225.00	\$67.50
7/16/2024	Samantha Holbrook	Participating in weekly co-counsel status call; emails concerning class list	0.5	\$550.00	\$275.00
7/16/2024	Samantha Holbrook	Call with expert regarding class certification	0.6	\$550.00	\$330.00
7/17/2024	Samantha Holbrook	Editing class certification notices; emails and discussions concerning same	1.0	\$550.00	\$550.00
7/23/2024	Damian Gomez	downloading and storing discovery documents; emails with Sam on the same	0.1	\$225.00	\$22.50
7/26/2024	Samantha Holbrook	Preparing for/participating in call with co-counsel concerning decertification motion	1.9	\$550.00	\$1,045.00
7/29/2024	Samantha Holbrook	Emails concerning extension motion; reviewing motion for extension	0.3	\$550.00	\$165.00
7/29/2024	Samantha Holbrook	Preparing for/participating in call with co-counsel to discuss case strategy	1.6	\$550.00	\$880.00
7/29/2024	Jonathan Shub	Preparing for/participating in call with co-counsel to discuss case strategy	1.6	\$1,050.00	\$1,680.00
7/30/2024	Damian Gomez	emails with Sam and Lacey re: motion response; research on the same	0.3	\$225.00	\$67.50
8/7/2024	Samantha Holbrook	Emails concerning discovery; discussions concerning motion to seal	0.3	\$550.00	\$165.00
8/7/2024	Damian Gomez	team meeting; re case status and strategy	0.1	\$225.00	\$22.50
8/12/2024	Samantha Holbrook	Analyzing defendant's motion to seal; email with team to discuss strategy	0.5	\$550.00	\$275.00
8/12/2024	Samantha Holbrook	Researching/discussing motion to seal opposition	0.5	\$550.00	\$275.00
8/13/2024	Samantha Holbrook	Motion to seal opposition	3.6	\$550.00	\$1,980.00
8/14/2024	Samantha Holbrook	Motion to seal opposition research; call with Diane Danois concerning same	1.3	\$550.00	\$715.00
8/14/2024	Diane Danois	Meeting with Sam re: UHC Document Review project; Review Motions and begin working on Excel spreadsheet.	4.0	\$400.00	\$1,600.00
8/15/2024	Diane Danois	Document Review project; Kown & Mugler > Unredacted Declarations > Unredacted Mugler Declarations with Exhibits.	5.0	\$400.00	\$2,000.00
8/16/2024	Samantha Holbrook	Analyzing motion to seal research; discussing same with Diane Danois	0.5	\$550.00	\$275.00
8/20/2024	Damian Gomez	firm meeting; re case and strategy update	0.1	\$225.00	\$22.50
8/21/2024	Jonathan Shub	Preparing for/participating in weekly call with co-counsel	1.3	\$1,050.00	\$1,365.00
8/23/2024	Jonathan Shub	Preparing for/participating in weekly call with co-counsel	1.0	\$1,050.00	\$1,050.00
8/26/2024	Jonathan Shub	Discussing discovery responses with internal team; emails concerning upcoming depositions and witnesses	0.3	\$1,050.00	\$315.00
8/27/2024	Samantha Holbrook	Preparing for/participating in weekly call with co-counsel	0.7	\$550.00	\$385.00
8/27/2024	Jonathan Shub	Preparing for/participating in weekly call with co-counsel	0.7	\$1,050.00	\$735.00
8/28/2024	Samantha Holbrook	Drafting opposition to motion to seal	2.9	\$550.00	\$1,595.00

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8/28/2024	Samantha Holbrook	Drafting opposition to motion to seal	1.0	\$550.00	\$550.00
8/28/2024	Jonathan Shub	Drafting opposition to motion to seal	1.0	\$1,050.00	\$1,050.00
8/29/2024	Samantha Holbrook	Researching and drafting opposition to motion to seal	1.6	\$550.00	\$880.00
8/29/2024	Jonathan Shub	Janzig Deposition	5.5	\$1,050.00	\$5,775.00
8/29/2024	Damian Gomez	review of declaration; emails with Sam on files	0.2	\$225.00	\$45.00
8/29/2024	Samantha Holbrook	Researching opposition to motion to seal; drafting response	1.1	\$550.00	\$605.00
8/30/2024	Samantha Holbrook	Researching and drafting response to motion to seal	5.6	\$550.00	\$3,080.00
8/30/2024	Jonathan Shub	Bowdish Deposition	5.5	\$1,050.00	\$5,775.00
8/30/2024	Diane Danois	Document Review project - Continue to review documents relating to Defendant's Motion to Seal 358 Exhibits per Sam's instructions.	2.0	\$400.00	\$800.00
8/30/2024	Jonathan Shub	Researching and drafting response to motion to seal	5.6	\$1,050.00	\$5,880.00
8/31/2024	Diane Danois	Document Review project - Continue to review documents relating to Defendant's Motion to Seal 358 Exhibits per Sam's instructions.	4.0	\$400.00	\$1,600.00
9/2/2024	Diane Danois	Document Review project - Continue to review documents relating to Defendant's Motion to Seal 358 Exhibits per Sam's instructions.	8.0	\$400.00	\$3,200.00
9/3/2024	Samantha Holbrook	Research and discussing opposition to motion to seal	1.0	\$550.00	\$550.00
9/3/2024	Samantha Holbrook	Group call; work on opposition to motion to seal	2.1	\$550.00	\$1,155.00
9/3/2024	Damian Gomez	team meeting re: case update and further strategy	0.1	\$225.00	\$22.50
9/3/2024	Damian Gomez	emails with Sam and Diane re: document review	0.1	\$225.00	\$22.50
9/3/2024	Diane Danois	Document Review project - Continue to review documents relating to Defendant's Motion to Seal 358 Exhibits per Sam's instructions & brief call with Sam.	4.5	\$400.00	\$1,800.00
9/3/2024	Jonathan Shub	Group call; work on opposition to motion to seal	2.1	\$1,050.00	\$2,205.00
9/3/2024	Jonathan Shub	Research and discussing opposition to motion to seal	1.0	\$1,050.00	\$1,050.00
9/9/2024	Damian Gomez	emails with Sam and Jon re: deposition material	0.3	\$225.00	\$67.50
9/10/2024	Samantha Holbrook	Group call concerning class decertification opposition and discussing discovery responses; follow up conversations with Jon concerning same	1.0	\$550.00	\$550.00
9/10/2024	Jonathan Shub	Group call concerning class decertification opposition and discussing discovery responses; follow up conversations with Jon concerning same	1.0	\$1,050.00	\$1,050.00
9/13/2024	Andrea Bonner	Revised opp. to Defendant's motion to decertify the class.	2.4	\$250.00	\$600.00
9/13/2024	Samantha Holbrook	Decert opposition and conversations internally concerning same; discussions concerning discovery	0.3	\$550.00	\$165.00
9/13/2024	Jonathan Shub	Decert opposition and conversations internally concerning same; discussions concerning discovery	0.3	\$1,050.00	\$315.00

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9/16/2024	Samantha Holbrook	Emails concerning class decertification motion and accompanying discovery; analyzing discovery	0.3	\$550.00	\$165.00
9/16/2024	Damian Gomez	following up with Def counsel about call recording document access; downloading and storing of the same	0.4	\$225.00	\$90.00
9/16/2024	Jonathan Shub	Emails concerning class decertification motion and accompanying discovery; analyzing discovery	0.3	\$1,050.00	\$315.00
9/17/2024	Samantha Holbrook	Call with team concerning decertification; preparing for/participating in call with defense counsel	2.4	\$550.00	\$1,320.00
9/17/2024	Damian Gomez	email with Jon re: depo documents	0.1	\$225.00	\$22.50
9/17/2024	Jonathan Shub	Call with team concerning decertification; preparing for/participating in call with defense counsel	2.4	\$1,050.00	\$2,520.00
9/24/2024	Samantha Holbrook	Participating in call with co-counsel to discuss case updates and strategy	1.5	\$550.00	\$825.00
9/24/2024	Jonathan Shub	Participating in call with co-counsel to discuss case updates and strategy	1.5	\$1,050.00	\$1,575.00
9/26/2024	Samantha Holbrook	Editing discovery responses	2.0	\$550.00	\$1,100.00
9/26/2024	Jonathan Shub	Editing discovery responses	2.0	\$1,050.00	\$2,100.00
10/1/2024	Samantha Holbrook	Team call with co-counsel; preparing for/participating in meet and confer with defense counsel	2.1	\$550.00	\$1,155.00
10/1/2024	Jonathan Shub	Team call with co-counsel; preparing for/participating in meet and confer with defense counsel	2.1	\$1,050.00	\$2,205.00
10/4/2024	Samantha Holbrook	Preparing for/participating in call with co-counsel concerning experts and related strategy discussions	1.0	\$550.00	\$550.00
10/4/2024	Jonathan Shub	Preparing for/participating in call with co-counsel concerning experts and related strategy discussions	1.0	\$1,050.00	\$1,050.00
10/8/2024	Samantha Holbrook	Weekly co-counsel call	0.7	\$550.00	\$385.00
10/8/2024	Jonathan Shub	Weekly co-counsel call	0.7	\$1,050.00	\$735.00
10/9/2024	Damian Gomez	reviewing documents on deposition; emails with Sam on the same	0.1	\$225.00	\$22.50
10/10/2024	Samantha Holbrook	Emails and analyzing letting from defense counsel	0.5	\$550.00	\$275.00
10/10/2024	Jonathan Shub	Emails and analyzing letting from defense counsel	0.5	\$1,050.00	\$525.00
10/11/2024	Samantha Holbrook	Pre-call with co-counsel to prep for meet and confer call	1.2	\$550.00	\$660.00
10/11/2024	Jonathan Shub	Pre-call with co-counsel to prep for meet and confer call	1.2	\$1,050.00	\$1,260.00
10/15/2024	Samantha Holbrook	Participating in meeting with co-counsel	1.4	\$550.00	\$770.00
10/15/2024	Jonathan Shub	Participating in meeting with co-counsel	1.4	\$1,050.00	\$1,470.00
10/16/2024	Christine Powers	Emails with Damian and Terrell Marshall re: new account for ShareFile; download and save discovery production.	1.5	\$295.00	\$442.50

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10/22/2024	Samantha Holbrook	Emails with co-counsel concerning strategy; analyzing 30(b)(6) notice	0.5	\$550.00	\$275.00
10/22/2024	Jonathan Shub	Emails with co-counsel concerning strategy; analyzing 30(b)(6) notice	0.5	\$1,050.00	\$525.00
10/24/2024	Samantha Holbrook	Strategy emails with co-counsel	0.3	\$550.00	\$165.00
10/24/2024	Jonathan Shub	Strategy emails with co-counsel	0.3	\$1,050.00	\$315.00
10/28/2024	Samantha Holbrook	Calls and emails among co-counsel concerning settlement discussions	1.0	\$550.00	\$550.00
10/28/2024	Jonathan Shub	Calls and emails among co-counsel concerning settlement discussions	1.0	\$1,050.00	\$1,050.00
10/29/2024	Samantha Holbrook	Emails concerning settlement offers	0.5	\$550.00	\$275.00
10/30/2024	Christine Powers	Download and save Second Supplemental Expert Report and all exhibits.	0.5	\$295.00	\$147.50
10/30/2024	Samantha Holbrook	Settlement emails and discussions	0.7	\$550.00	\$385.00
11/4/2024	Samantha Holbrook	Emails concerning settlement term sheet; reviewing term sheet	0.2	\$550.00	\$110.00
11/5/2024	Samantha Holbrook	Co-counsel call; emails concerning experts/settlement administration	0.5	\$550.00	\$275.00
11/19/2024	Samantha Holbrook	Participating in call with co-counsel to discuss settlement	0.5	\$550.00	\$275.00
11/26/2024	Samantha Holbrook	Editing settlement agreement and exhibits	5.8	\$550.00	\$3,190.00
12/3/2024	Samantha Holbrook	Participating in co-counsel call; follow up emails	0.3	\$550.00	\$165.00
12/6/2024	Christine Powers	Review Stip. for deadlines and update calendar.	0.2	\$295.00	\$59.00
12/10/2024	Samantha Holbrook	Participating in weekly call with co-counsel to discuss settlement; follow up emails concerning same	0.5	\$550.00	\$275.00
12/12/2024	Christine Powers	Draft and circulate JS declaration.	1.8	\$295.00	\$531.00
12/17/2024	Jonathan Shub	Participating in call with co-counsel to discuss settlement progress; follow up emails internally concerning settlement declaration	0.5	\$1,050.00	\$525.00
12/17/2024	Christine Powers	Edit Shub Decl for Preliminary Approval.	0.6	\$295.00	\$177.00
12/18/2024	Jonathan Shub	Editing preliminary approval brief; internal discussions concerning declaration in support of preliminary approval	1.0	\$1,050.00	\$1,050.00
12/18/2024	Samantha Holbrook	Editing preliminary approval brief; emails with co-counsel concerning same	2.7	\$550.00	\$1,485.00
12/18/2024	Christine Powers	Review JS edits to dec; save operative.	0.1	\$295.00	\$29.50
12/18/2024	Jonathan Shub	Editing preliminary approval brief; emails with co-counsel concerning same	1.5	\$1,050.00	\$1,575.00
12/18/2024	Samantha Holbrook	Editing preliminary approval brief; emails with co-counsel concerning same	1.5	\$550.00	\$825.00
12/20/2024	Christine Powers	Review settlement agreement and attach Jon's signature; return it to co-counsel; save in Clio.	0.2	\$295.00	\$59.00

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FRANTZ SAMSON, a Washington resident,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**DECLARATION OF FRANTZ
SAMSON IN SUPPORT OF
SERVICE AWARD**

I, Frantz Samson, declare as follows:

1. I am over 18 years of age, I make this declaration based on my own personal knowledge, and I am competent to testify to the facts in this declaration.

2. I began receiving calls from UnitedHealthcare in 2018 after I got a new cell phone number.

3. I have never been a UnitedHealthcare member, never provided my cell phone number to UnitedHealthcare, and never consented to receive calls from UnitedHealthcare. In fact, I told UnitedHealthcare to stop calling. I also tried to opt out of the calls by following recorded, interactive instructions. The calls wouldn't stop.

4. I hired my lawyers to file this lawsuit against UnitedHealthcare on behalf of myself and other people who received other calls. I told the lawyers about all the calls I had been

1 receiving and my efforts to stop the calls and the lawyers used this information to write my
2 complaint, which we filed at the beginning of 2019.

3 5. I stayed in contact with the lawyers throughout the case. During the late summer
4 and fall of 2019, I worked with my lawyers to answer questions that UnitedHealthcare asked me
5 about my case. I also gathered documents relating to the calls, including screenshots of the calls,
6 and I gave these documents to my lawyers. I repeated this multiples times in 2019 and 2020
7 because United sent me several requests for documents, including intrusive requests for personal
8 information wholly unrelated to the spam calls I received from United.

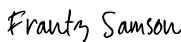
9 6. On December 2, 2019, UnitedHealthcare took my deposition. I spent hours
10 preparing for the deposition by reviewing key documents and meeting with my attorneys.
11 Although the deposition itself only lasted a couple of hours, I had to take the day off work. The
12 deposition was invasive and unpleasant at times as UnitedHealthcare tried to discredit me and
13 my claims. Still, I remained committed to pursuing this case on behalf of the class.

14 7. In late December 2019, UnitedHealthcare offered me a large sum of money to
15 settle my personal case only. I rejected this offer because UnitedHealthcare had not offered any
16 money to class members.

17 8. My lawyers told me in the summer of 2020 that the judge had stopped the case to
18 allow other cases in California to go first. I had to wait approximately two years before the case
19 started up again.

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

22 EXECUTED at seattle, WA this 12th day of March, 2025.

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Signed by:

Frantz Samson