# UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

Lonnie R. Berryman, Jr., individually and as a representative of the Class,

Plaintiff,

v.

Avantus, LLC,

Defendant.

Civil Action No. 3:21-cv-01651-VAB

MOTION FOR ATTORNEYS'
FEES AND NAMED PLAINTIFF
SERVICE AWARD

Plaintiff Lonnie R. Berryman, Jr. ("Plaintiff") and Class Counsel respectfully move the Court to approve (1) the requested attorneys' fees amount of \$267,242 to be paid to Class Counsel separate from the Settlement Fund, and (2) the requested Named Plaintiff Service Award of \$7,500 to be paid from the Settlement Fund.

Defendant Avantus, LLC<sup>1</sup> ("Defendant") does not oppose the relief sought in this Motion.

Dated: March 21, 2024

Respectfully submitted,

/s/ Joseph C. Hashmall

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<sup>&</sup>lt;sup>1</sup> Xactus, LLC is the successor in interest to certain assets of Avantus, LLC. Xactus, LLC, in its capacity as successor in interest to certain assets of Avantus, LLC and Avantus, LLC are collectively referred to as "Defendant."

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#### UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

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vs.

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Case No. 3:21-cv-01651-VAB

MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND NAMED PLAINTIFF SERVICE AWARD

Plaintiff and Class Counsel have zealously litigated this action for over two years, entirely on a contingent fee basis, with their efforts resulting in an impressive settlement that establishes a fund for payments to all eligible Settlement Class Members, at a per Class Member amount estimated at the high end of the statutory range provided under the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, *et seq.* These amounts are not being reduced by the requested attorneys' fees amount. While the Service Award of \$7,500 is requested to be disbursed from the Fund, the amount requested is in line with similar requests approved in this District.

The benefits provided to the Settlement Class would not have been attained absent Class Counsel's time, effort, and skill, as well as the Named Plaintiff's active participation in the case. The requested attorneys' fees are even more reasonable in light of Class Counsel's lodestar to date, which exceeds the requested amount, even before out-of-pocket costs are considered. That is, Counsel here are requesting significantly *less* than their fee as calculated at their customary hourly rates, a factor that weighs strongly in favor of approval of this motion.

Further, there is no "clear sailing" or other potentially problematic provision in the settlement regarding attorneys' fees. The attorneys' fees amount was negotiated only after relief for the Class was agreed upon. Moreover, attorneys' fees are to be paid separately from the

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Settlement Fund and therefore, the attorneys' fee award will not reduce Class Members' payments.

Class Counsel have received no payment or reimbursement to date for their efforts.

The Named Plaintiff Service Award contemplated, \$7,500, is reasonable and appropriate in light of Plaintiff's investment of time and energy in the litigation and the benefit his work created for Class Members.

Notice has been sent, and the notice included the proposed amount for attorneys' fees, as well as the proposed amount for the Service Award. No Settlement Class Member has objected to the amounts requested in this motion.

#### **BACKGROUND**

The litigation history, history of settlement negotiations, and the terms of the settlement are set forth in detail in the Motion and Memorandum in Support for Preliminary Approval (ECF No. 65) and are incorporated by reference here. This Memorandum will focus on the efforts of Class Counsel and Plaintiff to achieve the significant result in this case.

## I. Class Counsel's Experience and Efforts to Secure Benefits for the Class

Class Counsel are experienced and well-established FCRA litigators. (*See* ECF No. 65-2 ¶¶ 9-15; *McKey v. TenantReports.com*, No. 22-1908, ECF No 42 at 5 n. 2 (E.D. Pa. Feb. 27, 2024) (approving requested fee and noting that the undersigned "have extensive experience litigating FCRA class actions [and] represented the class zealously and professionally through complex litigation with very real litigation risks."). As a result of their experience in this type of litigation, Class Counsel were able to efficiently and effectively develop the claims in this matter and reach a classwide resolution with significant relief for the Class. Class Counsel have worked without compensation or reimbursement for their time and have paid all out-of-pocket expenses necessary to litigate and resolve the case. (Declaration of Joseph C. Hashmall ("Hashmall Decl.") ¶ 3.)

Class Counsel's investment of resources is not fully evident by the docket, as much of this matter was litigated outside of the courtroom.

Among other efforts, during litigation, Class Counsel (1) extensively researched and vetted the claims and drafted the complaint, (2) propounded and responded to written discovery, (3) conducted third party discovery of Defendant's data vendor, (4) prepared for and took two depositions of Defendant's representatives, (5) prepared for and defended Plaintiff and his wife's depositions, (6) reviewed data analysis by Plaintiff's retained expert and ultimately produced an expert report, (7) drafted the Motion for Class Certification and reply in support of same, (8) drafted the Motion to Strike and reply in support of same, and (9) prepared a detailed mediation statement in advance of mediation. (*Id.* ¶ 4.)

Following fulsome discovery and the filing of the Motion for Class Certification, the parties attended a full day mediation with third party neutral Hon. Barry R. Poretz (Ret.), and engaged in subsequent arms' length negotiations to explore resolution, including the exchange of numerous letters, emails and telephone calls. Class Counsel vetted the Settlement Agreement and its exhibits, and drafted the Motion for Preliminary Approval. Once the Court granted preliminary approval, Class Counsel also continued their work, this time focused on settlement administration, including working with the Settlement Administrator to finalize class notice and otherwise monitoring the notice process and class member response to same. Additionally, Class Counsel will draft the final approval motion papers, and prepare for and appear at the Final Fairness Hearing.

Class Counsel's lodestar reflects the dedication of resources to this matter. To date, Class Counsel have expended approximately 400 hours on this matter, resulting in \$303,643.50 in lodestar calculated at Class Counsel's normal hourly rates. (Hashmall Decl. ¶ 5.) Class Counsel

have also incurred costs in the amount of \$14,661.36. (Id.  $\P$  6.) After taking those costs into account, the requested fee constitutes only 84% of Class Counsel's lodestar in this matter. This negative multiplier also does not account for the time that will be spent on the continuing efforts referenced above in continuing to oversee settlement administration, preparing for final approval, and responding to inquiries from class members.

### II. The Named Plaintiff's Participation in the Case

Plaintiff has played a valuable role in bringing this case to a successful resolution. Among other things, Plaintiff has (1) reviewed and approved the complaint, (2) provided documents and information, including documents containing sensitive personal identifying and financial information, (3) prepared and appeared for his deposition, as did his wife, (4) consulted with Counsel during settlement negotiations, and (5) reviewed and approved the Settlement Agreement. (Hashmall Decl. ¶ 7.)

In sum, Plaintiff has actively engaged in the litigation and settlement here, and has stayed abreast of developments in the case. The settlement's allowance of \$7,500 in recognition of his efforts is more than appropriate.

#### **ARGUMENT**

Class Counsel seek an award of \$267,242 in attorneys' fees, to be paid separately from the common fund established for the Settlement Class. This request should be granted given the significant efforts of Class Counsel on behalf of the Class.

In a certified class action, a court "may award reasonable attorney's fees and nontaxable costs that are authorized by law or by the parties' agreement." Fed. R. Civ. P. 23(h). In assessing the reasonability of a request for attorneys' fees and costs, the Second Circuit has used either the

<sup>&</sup>lt;sup>1</sup> That is, the amount requested, \$267,242, represents only 84% of Class Counsel's \$318,304.86 total lodestar and out-of-pocket expenses.

"'lodestar' method, whereby the hours reasonably expended are multiplied by a reasonable hourly rate, and, if appropriate, a multiplier to take account of special circumstances; or the 'percentage of the fund' method, whereby the attorneys are awarded some percentage of the settlement fund that their efforts helped create." *Champion v. Interactive Brokers, LLC*, No. 08-1351, 2009 WL 10688825, \*1 (D. Conn. Sept. 4, 2009) (citing *Wal-Mart Stores, Inc. v. Visa*, 396 F.3d 96, 121 (2d Cir. 2005) and *Goldberger v. Integrated Res., Inc.*, 209 F.3d 43, 49-50 (2d Cir. 2000)).

In reviewing attorneys' fees that are to be paid separately from a common fund in the settlement context, such as is the case here, the courts generally apply the "lodestar method," rather than a "percentage method" to assess the reasonability of the fee. *Sanchez v. DPC New York Inc.*, 381 F. Supp. 3d 245, 250 (S.D.N.Y. 2019) (gathering cases in support). This method is appropriate here in light of both the fact that fees were negotiated separate and apart from the fund that will be used to pay class members, and in light of the fact that the FCRA is a fee-shifting statute. *See* 15 U.S.C. § 1681n(a)(3). This means that the statutory scheme contemplates that, at a minimum, attorneys who succeed in litigation should receive reasonable payment for the work performed. "Where a plaintiff has obtained excellent results, his attorney should recover a fully compensatory fee." *Hensley v. Eckerhart*, 461 U.S. 424, 435 (1983).

To determine the appropriate award under the lodestar method, "the court must: (1) determine the reasonable hourly rate; (2) determine the number of hours reasonably expended; (3) multiply the two to calculate the presumptively reasonable fee; and (4) make any appropriate adjustments to arrive at the final fee award." *Parris v. Pappas*, 844 F. Supp. 2d 262, 266 (D. Conn. 2012) (quoting *Adorno v. Port Auth. of New York and New Jersey*, 685 F. Supp. 2d 507, 511 (S.D.N.Y. 2010)). "Both [the Second Circuit] and the Supreme Court have held that the lodestar ... creates a 'presumptively reasonable fee." *Millea v. Metro-North R. Co.*, 658 F.3d 154, 166 (2d

Cir. 2011) (quoting *Arbor Hill Concerned Citizens Neighborhood Assoc. v. Cnty. of Albany*, 522 F.3d 182, 183 (2d Cir. 2008); citing *Perdue v. Kenny A.*, 559 U.S. 542 (2010)); *Quaratino v. Tiffany & Co.*, 166 F.3d 422, 425 (2d Cir.1999).

The court may then adjust the lodestar up or down based on certain factors, "such as the risk of the litigation and the performance of the attorneys," Goldberger, 209 F.3d at 47, though the lodestar calculation itself "includes most, if not all, of the relevant factors constituting a 'reasonable' attorney's fee...." Perdue, 559 U.S. at 553 (quoting Pennsylvania v. Del. Valley Citizens' Council for Clean Air, 478 U.S. 546, 565-66 (1986)). When, as is the case here, a requested fee represents a negative multiplier, i.e., the attorneys' calculated lodestar is higher than the amount requested, the requested fee's reasonableness is even further underscored. City of Providence v. Aeropostale, Inc., 2014 WL 1883494, \*13 (S.D.N.Y. May 9, 2014) ("Such a multiplier is well below the parameters used throughout district courts in the Second Circuit, which affords additional evidence that the requested fee is reasonable.") (citing *In re Bear Stearns Cos.* Sec. Derivative & ERISA Litig., 909 F. Supp. 2d 259, 271 (S.D.N.Y.2012) for approving requested fee with a negative multiplier and noting that the negative multiplier was a "strong indication" of the reasonableness of fee request and noting that lodestar multiples of over 4 are awarded by this Circuit). See also In re Sterling & Foster, Inc. Sec. Litig., 238 F. Supp. 2d 480, 490 (E.D.N.Y. 2002) ("the fact that any reasonable fee would necessarily represent a negative multiplier of the lodestar supports an award at the higher end of the spectrum.").

While courts applying the lodestar method generally also evaluate the percentage of the fund as a 'cross-check,' in cases brought under fee-shifting statutes, fee requests under the lodestar method are approved even when the requested fee exceeds the amount approved for the Class. *Fisher v. SD Prot. Inc.*, 948 F.3d 593, 604 (2d Cir. 2020) ("Few plaintiffs would be willing to pay

\$22,000 in attorneys' fees and costs to recover \$11,000 in overtime wages and statutory penalties, and [t]he whole purpose of fee-shifting statutes is to generate attorneys' fees that are disproportionate to the plaintiff's recovery") (internal quotation omitted, emphasis in original); Gonzalez v. Scalinatella, Inc., 112 F. Supp. 3d 5, 9 (S.D.N.Y. 2015) (awarding \$48,366.50 in attorneys' fees and \$1,150.60 in costs, even though plaintiff recovered only \$7,500); Grochowski v. Ajet Const. Corp., No. 97-cv-6269, 2002 WL 465272, at \*1 (S.D.N.Y. Mar. 27, 2002) (awarding \$97,207.50 in attorneys' fees, even though plaintiffs recovered only \$26,000); Samborski v. Linear Abatement Corp., No. 96-cv-1405, 1999 WL 739543, at \*4 (S.D.N.Y. Sept. 22, 1999) (awarding \$110,000 in attorneys' fees and \$7,437.59 in costs, even though plaintiffs recovered only \$50,000); Garcia v. Tyson Foods, Inc., 770 F.3d 1300, 1311 (10th Cir. 2014) (affirming "fee award [that] far exceeded the damages award" because "the fee award need not be proportionate to the damages award" and the district court "acted within its discretion" in approving the award); Howe v. Hoffman-Curtis Partners Ltd., LLP, 215 F. App'x 341, 342 (5th Cir. 2007) (affirming \$129,805) attorneys' fee award that exceeded the \$23,357 damages award because "it is not uncommon that attorney fee requests can exceed the amount of judgment in the case by many multiples"); see also Reibstein v. Rite Aid Corp., 761 F. Supp. 2d 241, 260 (E.D. Pa. 2011) (approving requested fee in FCRA class action in case where fees were larger than class recovery, finding that "the [percentage of the fund] cross-check's utility is limited in consumer cases where, as in this case, the total class recovery is relatively small"). Here, where the requested fee is the amount recovered for the Class and is also significantly less than Class Counsel's lodestar, the cross-check weighs in favor of approval.

Here, Class Counsel's lodestar represented by the number of hours expended to date, 400, multiplied by each timekeeper's respective hourly rate, results in a lodestar of \$303,643.50,

without any enhancement multiplier. The requested \$267,242, which represents only 84% of Class Counsel's total lodestar and costs, should thus be awarded.

### I. Class Counsel's Hourly Rates are Reasonable, as Were the Hours Expended.

## A. Hourly Rates

It is within the Court's discretion to determine what constitutes a reasonable hourly rate in a given fee determination. *Parris*, 844 F. Supp. 2d at 265. The determination makes a "case-specific inquiry into the prevailing market rates for counsel of similar experience and skill to the fee applicant's counsel." *M.K. ex rel. K. v. Sergi*, 578 F. Supp. 2d 425, 427 (D. Conn. 2008) (quoting *Farbotko v. Clinton Cnty. of N.Y.*, 433 F.3d 204, 209 (2d Cir. 2005)). "A reasonable starting point for determining the hourly rate for purposes of a lodestar calculation is the attorney's customary rate." *Parrish v. Sollecito*, 280 F. Supp. 2d 145, 169-70 (S.D.N.Y. 2003) (collecting cases in support). The Court may use "an out-of-district hourly rate – or some rate in between the out-of-district rate sought and the rates charged by local attorneys – in calculating the presumptively reasonable fee if it is clear that a reasonable, paying client would have paid those [] rates." *Arbor Hill*, 522 F.3d at 191. Additionally, "current rates, rather than historical rates, should be applied in order to compensate for the delay in payment." *LeBlanc-Sternberg v. Fletcher*, 143 F.3d 748, 764 (2d Cir. 1998).

The hourly rates used to reach the lodestar for Class Counsel here are appropriate given that Class Counsel are class action attorneys litigating nationwide, their years of experience, and that this was matter was a putative class action, which are inherently complex.<sup>2</sup> (*See* Hashmall Decl. ¶¶ 5, 8 for rates, experience.) In considering hourly rates, courts examine the rate

<sup>&</sup>lt;sup>2</sup> See, e.g., Edwards v. N. Am. Power & Gas, LLC, No. 14-1714-VAB, 2018 WL 3715273, \*10 (D. Conn. Aug. 3, 2018) (finding consumer class action to be complex); In re Frontier Comm'cns. Corp., No. 17-1617-VAB, 2022 WL4080324, \*11 (D. Conn. May 20, 2022) (finding similar).

"prevailing in the community for similar services by lawyers of reasonably comparable skill, experience and reputation." Blum v. Stenson, 465 U.S. 886, 895 n. 11 (1984). Here, the rates charged by Class Counsel fall within the range of rates approved in the Second Circuit. See, e.g., In re Synchrony Financial Sec. Litig., No. 18-cv-1818-VAB, 2023 WL 4992933, \*\*11-12 (D. Conn. Aug. 4, 2023) (finding lodestar crosscheck supported fee award, with lodestar being based on rates provided in affidavits by counsel ranging from \$800-\$1,250 for partners, \$775-825 for senior counsel, \$425-575 for associates, and \$350-400 for staff); Menkes v. Stolt-Nielsen S.A., No. 03-409, 2011 WL 13234815, \*\*5-6 (D. Conn. Jan. 25, 2011) (finding lodestar, calculated with "customary billing rates," which ranged from \$320-\$745 for attorneys, confirmed award was reasonable); In re Hi-Crush Partners L.P. Sec. Litig., No. 12-CIV-8557, 2014 WL 7323417, \*14 (S.D.N.Y. Dec. 19, 2014) (approving billing rates ranging from \$425 to \$825 per hour for attorneys); Williamsburg Fair Hous. Comm. v. N.Y. City Hous. Auth., No. 76 CIV. 2125, 2005 WL 736146, at \*12 (S.D.N.Y. Mar. 31, 2005), opinion amended on reconsideration, 2005 WL 2175998 (S.D.N.Y. Sept. 9, 2005) (observing that "a recent billing survey made by the National Law Journal shows that senior partners [ ] charge as much as \$750 per hour and junior partners charge as much as \$490 per hour").

Class Counsel's hourly rates have further been specifically approved in this Circuit, and in lead counsel's home jurisdiction of Minnesota, and Berger Montague's main office's home jurisdiction of the Eastern District of Pennsylvania. *See*, *e.g.*, *Gambles v. Sterling Infosystems*, *Inc.*, No. 15-cv-9746, ECF No. 205 (S.D.N.Y. Sept. 22, 2020) (granting motion for attorneys' fees, where Berger Montague's hourly rates were \$540-760 for attorneys); *Taylor v. Inflection Risk Sols.*, *LLC*, No. 20-cv-2266, ECF No. 94 (D. Minn. Nov. 15, 2022) (granting motion for attorneys' fees, awarding one-third of the fund "as reasonable attorneys' fees," where Berger Montague's

hourly rates were \$390-\$980 for attorneys and \$240-\$370 for support staff); *Rilley v. MoneyMutual, LLC*, No. 16-cv-4001, ECF No. 342 (D. Minn. April 14, 2020) (granting motion for attorneys' fees in full, which was based on the lodestar method, thus included a finding that Berger Montague's hourly rates of \$198-\$760 for attorneys and \$43-\$305 for support staff were reasonable); *In re Domestic Drywall Antitrust Litig.*, No. 13-md-2437, 2018 WL 3439454, \*20 (E.D. Pa. July 17, 2018) (holding that the hourly rates claimed by Berger Montague, among other firms, were "well within the range of rates charged by counsel in this district in complex cases"); *Devlin v. Ferrandino & Son, Inc.*, No. 15-4976, 2016 WL 7178338, \*10 (E.D. Pa. Dec. 9, 2016) ("[T]he hourly rates for Class Counsel [including Berger Montague] are well within the range of what is reasonable and appropriate in this market").<sup>3</sup>

### **B.** Hours Expended

"Where a plaintiff has obtained excellent results, his attorney should recover a fully compensatory fee. Normally this will encompass all hours reasonably expended on the litigation." *Hensley*, 461 U.S. at 435-36. To determine what is reasonable, the Court considers whether the hours expended by Counsel were "usefully" expended. *Lunday v. City of Albany*, 42 F.3d 131, 134 (2d Cir. 1994). These hours should reflect the hours "supported by time records<sup>4</sup>" and "that are not excessive or duplicative." *LeBlanc-Sternberg*, 143 F.3d at 764.

<sup>&</sup>lt;sup>3</sup> Plaintiff acknowledges that courts in this District have applied lower rates, albeit in dissimilar cases. *See, e.g., Strauch v. Computer Sciences Corp.*, No. 14-cv-956, 2020 WL 4289955, \*8 (D. Conn. July 27, 2020) (capping out-of-district rates over \$725 per hour for partners, at \$450 for attorneys and at \$195 per hour for staff and gathering cases in support). In any event, the Court need not make a precise determination as to what exact rates best apply, as even if Counsel's fee were calculated at those capped rates, the lodestar multiplier (under 1.5) would still be well within the range of approval. (Hashmall Decl. ¶ 9.)

<sup>&</sup>lt;sup>4</sup> Counsel seeking fees are "not required to record in great detail how each minute of [their] time was expended," *Hensley*, 461 U.S. 437 n.12, but are to "keep and present records from which the court may determine the nature of the work done," and "the amount of time" required. *F.H. Krear & Co. v. Nineteen Named Trustees*, 810 F.2d 1250, 1265 (2d Cir. 1987).

Here, Class Counsel's efforts achieved an exceptional result for the Settlement Class, and were conducted expeditiously with 400 hours expended. (*See* Hashmall Decl. Ex. A for underlying records.) These hours were all expended furthering litigation, and eventually settlement. As shown by the records, Class Counsel kept the number of timekeepers down, and focused each timekeeper's efforts on initiating litigation, pursuing and defending discovery and deposition, briefing key motions, and furthering settlement negotiations and finalization of same. (*Id.*) The hours are not duplicative nor are they excessive. They thus illustrate the reasonableness of the requested fee. *See*, *e.g.*, *Trustees of the I.B.E.W. Local Union No. 488 Pension Fund v. Norland Elec.*, *Inc.*, 2015 WL 3581011, \*5 (D. Conn. June 5, 2015) ("All documented tasks by counsel were directed toward preparation of the case and making the necessary motions to expedite resolution. In sum, the hours expended, both as to substance of task and length of time, are reasonable.").

Moreover, the relief Class Counsel secured for the Class with those efforts further underscores the reasonableness of the time spent. The settlement in this case provides payments to eligible Settlement Class Members at the high end of the statutory range provided for their claims under the FCRA. This estimated recovery is comparable to recoveries in other similar settlements for claims for inaccurate reporting. *See*, *e.g.*, *Pang v. Credit Plus*, No. 1:21-cv-00122, ECF No. 61 (D. Md. 2021) (final approval of settlement regarding deceased reporting where class members needed to file claim to recover; recovering class members received roughly \$430); *Roe v. IntelliCorp Records, Inc.*, No. 12-2288, ECF No. 139 (N.D. Ohio June 5, 2014) (final approval of settlement of inaccurate reporting, and other FCRA claims, providing for \$50-\$270 net per class member); *Ryals v. HireRight Sols. Inc.*, No. 09-625, ECF No. 127 (E.D. Va. Dec. 22, 2011) (final approval of settlement involving \$1681e(b) claims, providing \$15-\$200 *gross* per class member

recovery); *Ori v. Fifth Third Bank, Fiserv, Inc.*, No. 08-432, ECF No. 217 (E.D. Wis. Jan. 10, 2012) (final approval of settlement of inaccurate mortgage loan reporting, claims-made, each claimant receiving approximately \$55); *Speers v. Pre-Employ.com, Inc.*, No. 13-1849, ECF No. 83 (D. Or. Feb. 10, 2016) (final approval of settlement of failure to maintain strict procedures when reporting adverse public record information, resulting in approximately \$153 net per class member); *Villaflor v. Equifax Info. Servc. LLC*, No. 09-329, ECF No. 177 (N.D. Cal. May 3, 2011) (final approval of settlement of \$1681e(b) claims, providing credit monitoring for class members with a retail value of \$155).

The recovery provided for in the settlement is thus in line with or exceeds what Plaintiff may have received had he prevailed at trial, and is a certain, immediate, monetary benefit for the Class Members. These benefits were only achieved after Class Counsel diligently pursued discovery, researched and filed the Motion for Class Certification, and conducted substantial armslength negotiations.

#### **II.** The Amount Requested is Reasonable Overall.

### A. No Enhancement Requested.

As noted above, the amount requested as attorneys' fees is *less* than the fees actually incurred by Class Counsel. In all, Class Counsel incurred, inclusive of lodestar and out-of-pocket expenses, \$318,304.86 on this litigation and settlement. The amount requested, \$267,242, is thus less than the incurred amount. And this is even before the future work of the settlement is considered, including the forthcoming preparation for final approval briefing and hearing. These circumstances indicate reasonableness of the requested award. *City of Providence v. Aeropostale, Inc.*, 2014 WL 1883494, \*13 (S.D.N.Y. May 9, 2014) (finding reasonableness of fee supported by,

among other things, including a negative multiplier, that "while the fee is set, the legal work on this Action will not end with the Court's approval of the proposed Settlement.").

This negative multiplier means that Class Counsel will receive significantly less than their hourly rate for each hour worked, which further confirms the reasonableness of their request. *See*, *e.g.*, *In re Bear Stearns Cos. Sec. Derivative & ERISA Litig.*, 909 F. Supp. 2d 259, 271 (S.D.N.Y. 2012) (approving fee with negative multiplier and noting that lack of multiplier was "strong indication of the reasonableness of the [requested] fee."). In the Second Circuit, courts regularly award lodestar multipliers from 2 to 6 times lodestar. This affirms a lack of multiplier to be firmly within the range of approval. *See*, *e.g.*, *Bozak v. FedEx Ground Pkg. Sys.*, *Inc.*, No. 11-738, 2014 WL 3778211, \*7 (D. Conn. July 31, 2014) (collecting cases approving multipliers up to 8); *Simerlein v. Toyota Motor Corp.*, 2019 WL 2417404, \*25 (D. Conn. June 10, 2019) (1.68 multiplier "firmly at the low end of the range of multipliers regularly approved by district courts in the Second Circuit."); *Morris v. Affinity Health Plan, Inc.*, 859 F. Supp. 2d 611, 623-4 (S.D.N.Y. 2012) (collecting cases approving multipliers between 2 to 6).

## B. Review of Additional Considerations<sup>5</sup> Provides Further Support.

Foremost among the Court's considerations when evaluating the reasonability of an attorneys' fee is the benefit obtained for the class. *See Hensley*, 461 U.S. at 434-36. Here, Class Counsel achieved certain monetary relief at the high end of the statutory range for Class Members' claims. This is clearly a success, and certainly warrants the fee requested here, which is less than Class Counsel's lodestar.

<sup>&</sup>lt;sup>5</sup> In *Goldberger*, the Second Circuit outlined factors to consider when determining "reasonableness" of fees: (1) the time and labor expended by counsel; (2) the magnitude and complexities of the litigation; (3) the risk of the litigation ...; (4) the quality of representation; (5) the requested fee in relation to the settlement; and (6) public policy considerations. 209 F.3d at 50. Time and labor and Class Counsel's experience are addressed in Section I above in connection with reasonable time and rates.

Class Counsel took this case on a contingency basis and understood from the outset that there would be no guarantee of payment, and to date have received no payment for their services. (Hashmall Decl. ¶ 3.) Indeed, when Class Counsel took on this litigation, a successful conclusion was far from certain. To recover statutory damages under the FCRA, 15 U.S.C. § 1681n, Plaintiff would have had to prove not only that Defendant violated the statute, but that it did so willfully. See Safeco Ins. Co. of Am. V. Burr, 551 U.S. 47, 69 (2007). Defendant would have vigorously challenged this element of Plaintiff's claim, and to prevail, Plaintiff would have had to show not only that his interpretation of the FCRA was correct, but that Defendant's interpretation of the statute was objectively unreasonable. Safeco, 551 U.S. at 69. This is a high standard and considering the difficulties of proving willfulness, there was a substantial risk of nonpayment. See Domonoske, 790 F. Supp. 2d at 476 ("[G]iven the difficulties of proving willfulness or even negligence with actual damages [under the FCRA], there was a substantial risk of nonpayment."); Chakejian v. Equifax Info. Servs., LLC, 275 F.R.D. 201, 219 (E.D. Pa. 2011) ("Plaintiffs in this [FCRA] case would have to prove willfulness at trial. Because of the risk that they may not be able to do so . . . substantial attorney's fees should be awarded with settlement approval.").

Even in light of these risks, Class Counsel litigated the case for over two years, including pursuing discovery from Defendant, taking depositions, engaging an expert to review the data received in discovery and assist with identifying class members, researching and briefing class certification, among other efforts, and have fronted all of the costs of litigation. This is all while opposing experienced counsel on the other side. This provides further support for the requested fee. *Menkes v. Stolt-Nielsen S.A.*, 2011 WL 13234815, \*5 (D. Conn. Jan. 25, 2011) (approving fee where "the case raised complex issues of proof and presented substantial risk in establishing both liability and damages. Faced with able opposing counsel, Class Counsel demonstrated its

competence and experience in the field of securities fraud litigation by causing the claims of the class to progress beyond several dispositive motions through to preliminary settlement and certification.") (citing *In re Nortel Networks Corp. Sec. Litig.*, 539 F.3d 129, 132 (2d Cir. 2008) in support).

The type of representation Class Counsel provided here – taking a risky, complex class action with no guarantee of payment – is favored by public policy and approval of the requested fee furthers the encouragement of attorneys taking on these types of matters. *In re Synchrony Fin. Sec. Litig.*, 2023 WL 4992933, \*\*11-12 (D. Conn. Aug. 4, 2023); *In re Nortel Networks Corp. Sec. Litig.*, 539 F.3d at 132.

Further supporting the fee amount is consideration of the fifth *Goldberger* factor which considers "the requested fee in relation to the settlement." *Goldberger*, 209 F.3d at 50. Here the fee award in this case will be paid by Defendant directly to Counsel and will not impact the total amount recovered for Class Members (the common fund of \$450,758 – an amount close to double the requested fee amount).

### III. The Service Award is Appropriate

Class Counsel request a \$7,500 Class Representative Service Payment to compensate Plaintiff for his efforts and personal time spent assisting in the litigation and settlement of the case. Service awards are "common in class action cases and are important to compensate plaintiffs for the time and effort expended in assisting the prosecution of the litigation, the risks incurred by becoming and continuing as a litigant, and any other burdens sustained by the plaintiff." *Mohney v. Shelly's Prime Steak, Stone Crab & Oyster Bar*, No. 06-4270, 2009 WL 5851465 (S.D.N.Y. Mar. 31, 2009) (citing *Roberts v. Texaco, Inc.*, 979 F. Supp. 185, 200-1 (S.D.N.Y. 1997)).

Plaintiff has expended time and effort in this matter, consistently putting class members' interests first. Plaintiff stayed abreast of developments in the case, provided documents and substantive information, prepared and sat for a full day deposition (as did his wife), reviewed relevant pleadings, and evaluated the Settlement Agreement. As a result of Plaintiff's efforts, and his willingness to pursue the action, substantial benefits were achieved for the Settlement Class.

The requested award has also received no objections from the Class, and is in line with or less than awards granted in other complex litigation in this Circuit and in other FCRA class actions. See, e.g., Godson v. Eltman, Eltman, & Cooper, P.C., 328 F.R.D. 35, 60 (W.D.N.Y. 2018) (\$10,000 to named plaintiff in a consumer class action); Raniere v. Citigroup Inc., 310 F.R.D. 211, 220 (S.D.N.Y. 2015) (approving \$20,000, \$15,000, and \$7,500 awards to named plaintiffs); Norflet ex rel. Norflet v. John Hancock Life Ins. Co., 658 F. Supp. 2d 350, 354 (D. Conn. 2009) (approving award of \$20,000 to named plaintiff); In re Giant Interactive Grp., Inc. Sec. Litig., 279 F.R.D. 151, 166 (S.D.N.Y. 2011) (approving awards of between \$10,000 and \$5,400 to named plaintiffs who "devoted substantial effort and time to this case, including reviewing filings, producing documents, and travelling to be deposed"); McIntyre v. RealPage, Inc., No. 18-CV-03934, 2023 WL 2643201, at \*4 (E.D. Pa. Mar. 24, 2023) (approving award of \$10,000 to named plaintiff in FCRA class action); Tweedie v. Waste Pro of Fla., Inc., No. 8:19-CV-1827-AEP, 2021 WL 5843111, at \*3 (M.D. Fla. Dec. 9, 2021) (\$7,500 to named plaintiff in FCRA class action). Nor is the proposed award out of line with the amount other Class Members are to receive. See Chakejian v. Equifax Info. Servs., LLC, 275 F.R.D. 201, 220 (E.D. Pa. 2011) (approving \$15,000 per class representative in incentive awards in FCRA case, where members of the class received injunctive relief and free credit monitoring).

Under these circumstances, the request to award the Class Representative \$7,500 for his service is appropriate.

#### **CONCLUSION**

Based on the foregoing, the Court should grant Plaintiff's Motion and approve the requested awards of (1) attorneys' fees of \$267,242 to be paid to Class Counsel separately from the Settlement Fund, and (2) the Named Plaintiff Service Award of \$7,500 to be paid to Plaintiff from the Fund.

Dated: March 21, 2024

Respectfully submitted,

BERGER MONTAGUE PC

By: /s/Joseph C. Hashmall

E. Michelle Drake\*
Joseph C. Hashmall\*
BERGER MONTAGUE PC
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igentes@ctfairhousing.org

Counsel for Plaintiff

# UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

Lonnie R. Berryman, Jr., individually and as a representative of the Class,

Plaintiff.

v.

Avantus, LLC,

Defendant.

Civil Action No. 3:21-cv-01651-VAB

DECLARATION OF JOSEPH C. HASHMALL IN SUPPORT OF MOTION FOR ATTORNEYS' FEES AND SERVICE AWARD

- I, Joseph C. Hashmall, hereby declare as follows:
- 1. I am one of Class Counsel in the above-captioned matter.
- 2. I submit this Declaration in support of Plaintiff's Motion for Attorneys' Fees and Named Plaintiff Service Award.
- 3. Class Counsel took this case on a contingency basis and understood from the outset that there would be no guarantee of payment. Class Counsel have worked without compensation or reimbursement for their time and have paid all out-of-pocket expenses necessary to litigate and resolve the case.
- 4. Among other efforts, during litigation, Class Counsel (1) extensively researched and vetted the claims and drafted the complaint, (2) propounded and responded to written discovery, (3) conducted third party discovery of Defendant's data vendor, (4) prepared for and took two depositions of Defendant's representatives, (5) prepared for and defended Plaintiff and his wife's depositions, (6) reviewed data analysis by Plaintiff's retained expert and ultimately produced an expert report, (7) drafted the Motion for Class Certification and reply in support of

same, (8) drafted the Motion to Strike and reply in support of same, and (9) prepared a detailed mediation statement in advance of mediation.

5. To date, Class Counsel have expended 400.6 hours on this matter, resulting in \$303,643.50 in lodestar calculated at Class Counsel's normal hourly rates. A summary table of timekeepers and their rates, attorney years of experience, and hours worked on this matter is below, and detailed fee entries for Berger Montague's timekeepers are attached hereto as **Exhibit A**, redacted for privilege.

Timekeeper	Position	Atty. Years	Hourly	Hours	Lodestar
		of Exp.	Rate	Worked	
Hashmall, Joseph	Senior Counsel	13	\$770	274.9	\$211,673
Hibray, Jean	Paralegal		\$450	58.6	\$26,370
Drake, Eleanor	Executive	23	\$1180	44.6	\$52,628
Michelle	Shareholder				
Albanese, John	Shareholder	10	\$865	6.5	\$5,622.50
Lodge, Hans W	Shareholder	9	\$675	6	\$4,050
Gionnette, Julie	Legal Assistant		\$285	5	\$1,425
Gentes, Jeffrey	Managing	21	\$375	5	\$1,875
(Conn. Fair	Attorney				
Housing Ctr.)					
Totals				400.6	\$303,643.50

- 6. To date, Class Counsel have also expended \$14,661.36 in out-of-pocket costs that have not been reimbursed.
- 7. Among other things, Plaintiff has (1) reviewed and approved the complaint, (2) provided documents and information, including documents containing sensitive personal identifying and financial information, (3) prepared and appeared for his deposition, as did his wife, (4) consulted with Counsel during settlement negotiations, and (5) reviewed and approved the Settlement Agreement.
  - 8. Each of the lead attorneys who worked on this case has a wealth of experience:
    - a. E. Michelle Drake:
      - E. Michelle Drake is an Executive Shareholder in the Firm's Minneapolis office. Ms. Drake focuses her practice primarily on consumer protection,

improper credit reporting, and financial services class actions. Ms. Drake helped achieve one of the largest class action settlements in a case involving improper mortgage servicing practices associated with forceplaced insurance, resulting in a settlement valued at \$110 million for a nationwide class of borrowers who were improperly force-placed with overpriced insurance. Ms. Drake also served as liaison counsel and part of the Plaintiffs' Steering Committee on behalf of consumers harmed in the Target data breach, a case she helped successfully resolve on behalf of over ninety million consumers whose data was affected by the breach. More recently, Michelle has been successful in litigating numerous cases protecting consumers' federal privacy rights under the Fair Credit Reporting Act, securing settlements valued at over \$10 million on behalf of tens of thousands of consumers harmed by improper background checks and inaccurate credit reports in the last two years alone. Ms. Drake was admitted to the bar in 2001 and has since served as lead class counsel in over fifty class and collective actions alleging violations of the Fair Credit Reporting Act, the Fair Debt Collection Practices Act, the Fair Labor Standards Act, various states' unfair and deceptive trade practices acts, breach of contract and numerous other pro-consumer and pro-employee causes of action. Ms. Drake serves on the Board of the National Association of Consumer Advocates, is a member of the Partner's Council of the National Consumer Law Center, and is an At-Large Council Member for the Consumer Litigation Section for the Minnesota State Bar Association. She was named as a Super Lawyer in 2013-2021 and was named as a Rising Star prior to that. Ms. Drake was also appointed to the Federal Practice Committee in 2010 by the United States District Court for the District of Minnesota. She has been quoted in the New York Times and the National Law Journal, and her cases were named as "Lawsuits of the Year" by Minnesota Law & Politics in both 2008 and 2009.

#### b. Joe Hashmall:

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

#### c. Jeffrey Gentes:

- Mr. Gentes joined the Connecticut Fair Housing Center in 2010 and manages work on fair lending and foreclosure prevention. He is also a member of the state's Bench-Bar Foreclosure Committee, the George W. and Sadella D. Crawford Visiting Clinical Lecturer in Law at Yale Law School, and a registered lobbyist. Prior to joining the Center, Mr. Gentes worked at the Homeowner Defense Project of Staten Island Legal Services. Mr. Gentes was raised in Lebanon, Connecticut and received his B.A. from the University of Connecticut and his J.D. from New York University School of Law.
- 9. If the capped rates proposed in *Strauch v. Computer Sciences Corp.*, No. 14-cv-956, 2020 WL 4289955, \*8 (D. Conn. July 27, 2020) (capping out-of-district rates over \$725 per hour for partners, at \$450 for attorneys and at \$195 per hour for staff) were to be applied here, Class Counsel's lodestar would be \$179,754.50, which would require a 1.48 multiplier only to account for the requested amount of \$267,242.
- 10. Berger Montague PC's time records are maintained in accordance with industry standards to ensure reliability and transparency. The firm's formal policy requires all timekeepers—including attorneys and support staff—to keep records of time worked contemporaneously and to provide sufficient detail to convey the nature and merit of the work performed. To ensure each time entry contains sufficient detail, Berger Montague requires time entries to include both matter numbers (corresponding to the specific case) and task codes (corresponding to the type of work performed). BMPC uses the widely-accepted ABA Litigation Code Set, which includes 29 task codes spread across 5 stages of litigation (e.g., Pre-Trial Pleadings and Motions, Discovery, etc.) to allocate time to particular tasks. This model, endorsed

by courts, 1 ensures that time is billed in a uniform and task-oriented manner. 2 Timekeepers are

also required to provide narrative descriptions setting forth the case-specific tasks associated with

each time entry.

This manner of time-keeping, with contemporaneous records and detailed 11.

descriptions broken down by task, provides a level of accountability that courts nationwide

routinely recommend when scrutinizing applications for attorneys' fees. Deary v. City of

Gloucester, 9 F.3d. 191, 197-98 (1st Cir. 1993) ("In order to recover fees, attorneys must submit

a full and precise accounting of their time, including specific information about number of hours,

dates, and the nature of the work performed."); Bode v. United States, 919 F.2d 1044, 1047 (5th

Cir. 1990) (collecting cases) ("[C]ourts customarily require the applicant to produce

contemporaneous billing records or other sufficient documentation so that the district court can

fulfill its duty to examine the application...").

The foregoing statement is made under penalty of perjury, and is true and correct to the best of my

knowledge and belief.

Date: March 21, 2024

/s/Joseph C. Hashmall

Joseph C. Hashmall

<sup>1</sup> See Yahoo!, Inc. v. Net Games, Inc., 329 F. Supp. 2d 1179, 1189 (N.D. Cal. 2004) ("The ABA template commends itself to parties applying for fee awards."); Albion Pac. Prop. Res., LLC v.

Seligman, 329 F. Supp. 2d 1163, 1174 (N.D. Cal. 2004) (same).

<sup>2</sup> American Bar Association, Uniform Task-Based Management System, available at https://www.americanbar.org/groups/litigation/resources/uniform task based management syst em/ ("The Litigation Code Set has formed the basis for most, if not all, schemes to record and bill time on an hourly basis.").

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# **EXHIBIT A**

empname	entrydate	LodestarRate	hrs	LodestarAmount	narrative
Albanese, John	7/12/2021	\$865.00		519	Review documents and draft co-counsel agreement.
Lodge, Hans W	7/12/2021	\$675.00			Berryman v. Avantus: TC to CC McClelland discussing
Lodge, Hans W	7/12/2021	\$675.00			Berryman v. Avantus: read and respond to email from JA re:
Lodge, Hans W	7/13/2021	\$675.00			Berryman v. Avantus: Read and respond to emails from CL and Albanese re:
Lodge, Hans W	7/13/2021	\$675.00			Berryman v. Avantus: create calendar invite for conference call to discuss case
Albanese, John	7/15/2021	\$865.00			Phone calls with clients.
Lodge, Hans W	7/15/2021	\$675.00			Berryman v. Avantus: TC w/ Albanese and McClelland discussing , etc.
Lodge, Hans W	7/20/2021	\$675.00	0.3	202.5	Berryman v. Avantus: Review and edit Co-Counsel Agreement. Email to Co-Counsel, McClelland.
Lodge, Hans W	7/20/2021	\$675.00			Berryman v. Avantus: Draft and email to CL.
Lodge, Hans W	7/20/2021	\$675.00			Berryman v. Avantus: Draft email to CL attaching .
Lodge, Hans W	7/26/2021	\$675.00			TC to CL to answers questions re:
Lodge, Hans W	7/27/2021	\$675.00			TC to CL with CC McClelland discussing
Lodge, Hans W	7/29/2021	\$675.00			Draft email to CL .
Albanese, John	8/10/2021	\$865.00			Review and edit complaint.
Hashmall, Joseph	10/8/2021	\$770.00			Review of case file and draft complaint in
Hashmall, Joseph	10/8/2021	\$770.00			Litigation team meeting
Drake, Eleanor Michelle		\$1,180.00			bi-weekly team check in meeting on upcoming deadlines, case status and next steps
	10/8/2021				
Hibray, Jean	10/8/2021	\$450.00			Case meeting.
Hashmall, Joseph	10/12/2021	\$770.00			Review of case file in advance of drafting of complaint
Hashmall, Joseph	10/13/2021	\$770.00			Call with litigation team regarding plan to file complaint
Lodge, Hans W	10/13/2021	\$675.00			Meeting with FCRA Class Team discussing case and next steps and considerations before filing.
Hibray, Jean	10/15/2021	\$450.00			Review report, calendar SOL
Hashmall, Joseph	10/18/2021	\$770.00			Drafting complaint, internal emails regarding
Hashmall, Joseph	10/19/2021	\$770.00	0.3	231	Review of status of draft complaint, filing plan, internal email regarding same
Lodge, Hans W	10/19/2021	\$675.00	0.1	67.5	Read and respond to emails from JH re: scheduling call with CL
Hashmall, Joseph	10/26/2021	\$770.00	0.1	77	Call with Michelle Drake regarding draft complaint
Hashmall, Joseph	10/27/2021	\$770.00	0.2	154	Internal emails regarding plan to file case
Hashmall, Joseph	10/27/2021	\$770.00	0.2	154	Internal emails regarding selection of local counsel
Lodge, Hans W	10/27/2021	\$675.00	0.1	67.5	TC from CC McClelland discussing status of case and next steps.
Drake, Eleanor Michelle	10/27/2021	\$1,180.00	0.5	590	email with JCH re logistics for filing case, filing location, and local counsel requirements
Hashmall, Joseph	10/29/2021	\$770.00	0.5	385	Review of draft complaint, plan for filing case
Hashmall, Joseph	11/1/2021	\$770.00	0.1	77	Litigation team meeting
Albanese, John	11/1/2021	\$865.00	0.1	86.5	Discuss case strategy with litigaiton team
Drake, Eleanor Michelle	11/1/2021	\$1,180.00	0.1	118	team meeting re next steps on cases
Hashmall, Joseph	11/12/2021	\$770.00			Further edits to draft complaint
Hashmall, Joseph	11/12/2021	\$770.00	0.3	231	Internal email regarding local counsel selection,
Hashmall, Joseph	11/15/2021	\$770.00			Internal email re plan
Hashmall, Joseph	11/15/2021	\$770.00			Internal emails regarding
Hashmall, Joseph	11/15/2021	\$770.00			Emails and voicemail to client regarding
Lodge, Hans W	11/15/2021	\$675.00			Read and respond to email from Hashmall re: next steps and
Hashmall, Joseph	11/17/2021	\$770.00			Internal emails regarding
Hashmall, Joseph	11/18/2021	\$770.00			Review of the state of the stat
Hashmall, Joseph	11/22/2021	\$770.00			Email to cocounsel attaching cocounsel agreement for signature
Hashmall, Joseph	11/22/2021	\$770.00			Review of Michelle Drake's edits and comments to complaint, further edits to same
Hashmall, Joseph	11/23/2021	\$770.00			Revisions to draft complaint, internal emails regarding same
Hashmall, Joseph	11/23/2021	\$770.00			Voicemail and email to client
Hashmall, Joseph	11/24/2021	\$770.00			Voicemail to client, internal email regarding
Hashmall, Joseph	11/24/2021	\$770.00			Review of and next steps needed to file case, internal email regarding same
Hashmall, Joseph	11/29/2021	\$770.00			Call with Michelle Drake regarding draft complaint
Hashmall, Joseph	11/29/2021	\$770.00	0.2	154	Internal email regarding setting

Hashmall Jan	11/20/2021	4770 00 0 D	221 Call with aliant varieties
Hashmall, Joseph	11/30/2021	\$770.00 0.3	231 Call with client regarding
Hashmall, Joseph	11/30/2021	\$770.00 0.5	385 Revisions to draft complaint, internal email regarding same
Hashmall, Joseph	12/2/2021	\$770.00 0.1	77 Litigation team meeting
Albanese, John	12/2/2021	\$865.00 0.1	86.5 Discuss case strategy with case team
Drake, Eleanor Michelle	12/2/2021	\$1,180.00 0.1	118 team meeting to discuss case status, deadlines, and next steps in litigation
Hashmall, Joseph	12/3/2021	\$770.00 0.3	231 Internal email and email to cocounsel regarding the selection and retention of local counsel
Hashmall, Joseph	12/6/2021	\$770.00 0.1	77 Email with referring counsel regarding draft complaint
Hashmall, Joseph	12/6/2021	\$770.00 0.4	308 Emails with potential local counsel regarding time to discuss and copy of draft complaint
Hashmall, Joseph	12/6/2021	\$770.00 0.7	839 Review of Michelle Drake's edits to complaint, further edits to same, email to client
Hashmall, Joseph	12/6/2021	\$770.00 0.5	385 Voicemail and phone call with potential local counsel
Drake, Eleanor Michelle	12/6/2021	\$1,180.00 0.9	1062 review final complaint, redline, revise, give approval for sending to local counsel
Hashmall, Joseph	12/7/2021	\$770.00 0.2	154 Email with client regarding
Hashmall, Joseph	12/7/2021	\$770.00 0.2	Review of revised cocounsel agreement, email to cocounsel and local counsel regarding same
Hashmall, Joseph	12/7/2021	\$770.00 0.2	154 Call with client regarding
Hibray, Jean	12/7/2021	\$450.00 0.8	Draft Amended Co-Counsel Agreement, Send Docusigns of both.
Hashmall, Joseph	12/8/2021	\$770.00 0.5	Emails with local counsel regarding filing logistics and emails with client
Hashmall, Joseph	12/8/2021	\$770.00 0.2	154 Internal emails regarding finalizing and filing complaint
Hibray, Jean	12/8/2021	\$450.00 1	450 Proof/format complaint, prepare initaiting docs. Review D Ct procedures
Hibray, Jean	12/9/2021	\$450.00 0.3	135 Finalize and send initiating docs to local to file
Hashmall, Joseph	12/10/2021	\$770.00 0.1	77 Internal email regarding preservation letters and to Defendant
Hashmall, Joseph	12/13/2021	\$770.00 0.3	Emails to client and to local counsel regarding
Hashmall, Joseph	12/13/2021	\$770.00 0.2	154 Email to local counsel regarding filing of complaint
Hibray, Jean	12/13/2021	\$450.00 0.3	135 Review emails re additional form, send to client.
Hashmall, Joseph	12/14/2021	\$770.00 0.3	231 Internal emails and emails with local re service, PHV motions, and judicial assignment
Hashmall, Joseph	12/14/2021	\$770.00 0.2	154 Review and approval of pro hoc motion
Hibray, Jean	12/14/2021	\$450.00 0.3	135 Review local counsel's email confirming filing/next steps, respond.
Hibray, Jean	12/14/2021	\$450.00 0.8	360 Draft Drake and Hashmall pro hacs
Hibray, Jean	12/15/2021	\$450.00 0.3	135 Email local pro hac motions to finalize and file.
Hibray, Jean	12/15/2021	\$450.00 0.5	Prepare preservation/service letter, compile initial docs, send to Metro to serve.
Hibray, Jean	12/15/2021	\$450.00 0.3	135 Review initial orders, docket accordingly
Hibray, Jean	12/15/2021	\$450.00 0.3	135 Prepare , email to client.
Hibray, Jean	12/16/2021	\$450.00 0.2	90 Email with local counsel re pro hac motions and next steps
Gionnette, Julie	12/17/2021	\$285.00 0.1	28.5 download and review docket entry
Hibray, Jean	12/17/2021	\$450.00 0.4	180 Prepare and file notices of appearance for Drake and Hashmall
Hibray, Jean	12/27/2021	\$450.00 0.1	45 Review Metro response on service attempts.
Hibray, Jean	12/27/2021	\$450.00 0.2	90 Research alternate service address, email Metro re same
Hibray, Jean	1/3/2022	\$450.00 0.1	45 Check on service status
Albanese, John	1/4/2022	\$865.00 0.1	86.5 Discuss case status and strategy with internal litigaiton team.
Drake, Eleanor Michelle	1/4/2022	\$1,180.00 0.1	118 team meeting to discuss next steps in litigation
Hibray, Jean	1/5/2022	\$450.00 0.6	270 Review CT SOS, business rules, re substitute service. Ressearch entity's addresses. Email team re same
Hibray, Jean	1/11/2022	\$450.00 0.2	90 Emails re service status
Hibray, Jean	1/12/2022	\$450.00 0.6	270 Draft notice and waiver, cover email to potential opposing
Drake, Eleanor Michelle	1/13/2022	\$1,180.00 0.3	354 emails re failed service of process, effort to reach out to wilson elser
Hibray, Jean	1/14/2022	\$450.00 0.1	45 Email re service status
Hashmall, Joseph	1/17/2022	\$770.00 0.4	Review of developments in case and emails regarding service that occurred during parental leave, internal email regarding request for waiver of service
Hibray, Jean	1/18/2022	\$450.00 0.2	90 Update waiver documents, email to opposing
Hibray, Jean	1/18/2022	\$450.00 0.1	45 Email alternate attorney to withdraw waiver
Hibray, Jean	1/18/2022	\$450.00 0.3	135 Edit preservation letter, compile packet and send to new opposing counsel
Hashmall, Joseph	1/18/2022	\$770.00 0.1	77 Call with Michelle Drake regarding next steps in case
Hashmall, Joseph	1/18/2022	\$770.00 0.1	77 Internal emails regarding preservation letters and draft discovery
Hashmall, Joseph	1/18/2022	\$770.00 0.3	231 Review and approval of revised preservation letter, internal email regarding same
пазлитан, эоэсри	1/10/2022	ψ// 0.00   0.5	202 Torrion and approval of foresce presentation feeter, internal chair regulating same

Hashmall, Joseph	1/24/2022	\$770.00			Email exchange with local counsel regarding service of complaint
Hashmall, Joseph	1/24/2022	\$770.00	0.3	231	Review of case filing status and deadlines
Hashmall, Joseph	1/25/2022	\$770.00	0.3	231	Emails with opposing counsel regarding waiver of service
Hashmall, Joseph	1/26/2022	\$770.00	0.3	231	Legal research regarding
Hibray, Jean	1/26/2022	\$450.00	0.2	90	Finalize and file waiver of service
Gionnette, Julie	1/26/2022	\$285.00	0.1	28.5	download and review docket entry
Hibray, Jean	2/4/2022	\$450.00	0.8	360	Draft RFPs, Interrogs, Set I.
Hashmall, Joseph	2/9/2022	\$770.00	0.1	77	Litigation team meeting
Albanese, John	2/9/2022	\$865.00	0.1	86.5	Discuss case strategy with litigation team
Drake, Eleanor Michelle	2/9/2022	\$1,180.00	0.1	118	team meeting to discuss next steps in litigation
Hashmall, Joseph	2/14/2022	\$770.00	0.5	385	Research regarding , internal emails regarding same
Hashmall, Joseph	2/15/2022	\$770.00	0.2	154	Review of draft settlement letter, internal emails regarding same
Hibray, Jean	2/15/2022	\$450.00	0.2	90	Prepare Rule 408 letter, finalize and send
Hashmall, Joseph	2/17/2022	\$770.00	0.2	154	Review of case schedule and upcoming deadlines
Hashmall, Joseph	3/1/2022	\$770.00	0.1	77	Review of case schedule and deadlines regarding discovery opening
Hashmall, Joseph	3/2/2022	\$770.00	0.1	77	Email to Joseph McClelland regarding
Hashmall, Joseph	3/2/2022	\$770.00		231	Email to local counsel regarding case schedule, timing of 26(f)
Drake, Eleanor Michelle	3/2/2022	\$1,180.00			call with J. Hashmall re case status and next steps
Hashmall, Joseph	3/3/2022	\$770.00			Drafting Rule 26(f) report, editing draft discovery, email to opposing counsel attaching same
Hibray, Jean	3/3/2022	\$450.00	-		Review docket, email re protective order.
Lodge, Hans W	3/3/2022	\$675.00	-		Read and respond to email from EMD re: assistance with drafting discovery
Drake, Eleanor Michelle	3/4/2022	\$1,180.00			call with J. Hashmall re contours of draft discovery
Hashmall, Joseph	3/7/2022	\$770.00	-		Review of case status and upcoming deadlines
Drake, Eleanor Michelle	3/8/2022	\$1,180.00			team meeting re case status and next steps
·	1				review redline and revise , emails with J Hashmall re same. Review
Drake, Eleanor Michelle	3/8/2022	\$1,180.00	0.5	590	transcript
Drake, Eleanor Michelle	3/11/2022	\$1,180.00	0.4	472	review status of file, correspondence to J Hashmall re need 26f report and draft discovery
Hashmall, Joseph	3/17/2022	\$770.00	0.1	77	Email to opposing counsel regarding 26(f) call
Hashmall, Joseph	3/17/2022	\$770.00	0.1	77	Litigation team meeting
Albanese, John	3/17/2022	\$865.00	0.1	86.5	Meet wit case team regarding case strategy
Drake, Eleanor Michelle	3/17/2022	\$1,180.00	0.1	118	check in meeting with team re upcoming deadlines and next steps
Hashmall, Joseph	3/21/2022	\$770.00	0.2	154	Email exchange with opposing counsel regarding deadline to respond to complaint
Hashmall, Joseph	3/22/2022	\$770.00	0.6	462	Email to local counsel regarding Defendant's local counsel, internal email regarding Defendant's answer and disclosure statement
Hashmall, Joseph	3/22/2022	\$770.00	0.6	462	Review of Defendant's answer
Hashmall, Joseph	3/22/2022	\$770.00	0.3	231	Email to opposing counsel to schedule Rule 26f conference
Gionnette, Julie	3/22/2022	\$285.00	0.2	57	download and review answer to complaint and supporting docs; email docs to J. Hashmall
Hashmall, Joseph	3/25/2022	\$770.00	-		Emails with opposing counsel and local counsel regarding upcoming 26(f)
Hashmall, Joseph	3/25/2022	\$770.00			Internal emails regarding edits to draft discovery; review of edits to same
Hibray, Jean	3/25/2022	\$450.00			Review answer, edit definitions in discovery requests, email with J Hashmall re same
Hibray, Jean	3/25/2022	\$450.00	-		Finalize requests for Tuesday
Hashmall, Joseph	3/29/2022	\$770.00	-		Rule 26(f) conference with opposing counsel
Hashmall, Joseph	3/29/2022	\$770.00	-		Review of case materials in advance of rule 26(f) conference
Hashmall, Joseph	3/29/2022	\$770.00			Email to opposing counsel after Rule 26(f) conference, serving discovery
Hashmall, Joseph	3/29/2022	\$770.00	-		Drafting stipulation regarding production of FCRA data
Hashmall, Joseph	3/31/2022	\$770.00			Review of status of and deadlines in case
Hibray, Jean	3/31/2022	\$450.00	-		Docket post-26f deadlines
Hashmall, Joseph	4/1/2022	\$770.00			Review of draft data production order, email to opposing counsel regarding same
			-		
Hibray, Jean	4/1/2022	\$450.00			Draft joint motion & prop order re data  Internal amails and amail to appearing sourcel regarding 26(f) report
Hashmall, Joseph	4/6/2022	\$770.00	-		Internal emails and email to opposing counsel regarding 26(f) report
Hashmall, Joseph	4/6/2022	\$770.00			Litigation team meeting
Albanese, John	4/6/2022	\$865.00	-		Meet with case team to discuss case strategy/
Hibray, Jean	4/6/2022	\$450.00	0.1	45	Check local rules, docket same

4/6/2022	\$1,180.00	0.1	118/team meeting to discuss next stens in litigation
			118 team meeting to discuss next steps in litigation
4/8/2022	\$770.00	-	154 Email to opposing counsel regarding 26(f) report
	-		90 Draft initial disclosures
			154 Email with opposing counsel regarding 26(f) report
	-	_	154 Email to opposing counsel regarding 26(f) report
	-		Review of Defendant's redlines to draft 26(f) report, internal emails, emails to opposing counsel regarding same
4/12/2022	-	_	154 Call with opposing counsel regarding filing of 26(f) report
4/12/2022	\$450.00	0.2	90 Finalize & e-serve initial disclosures
4/13/2022	\$770.00	0.3	231 Review of Defendant's initial disclosures
4/20/2022	\$770.00	0.2	154 Review of draft client
4/20/2022	\$450.00	0.1	, finalize and email same
4/25/2022	\$770.00	0.4	308 Review of schedule in case, email exchange with local counsel regarding same
4/29/2022	\$770.00	1.3	1001 Review of Defendant's written discovery responses, email to opposing counsel regarding same
5/2/2022	\$770.00	1.4	1078 Review of Defendant's discovery responses, drafting meet and confer letter
5/3/2022	\$770.00	0.1	77 Litigation team meeting
5/3/2022	\$865.00	0.1	86.5 Attend case meeting with internal litigation team.
5/3/2022	\$1,180.00	0.1	118 team meeting re next steps in litigation
5/4/2022	\$770.00	0.4	308 Edits to draft meet and confer letter, email to opposing counsel attaching same
5/4/2022	\$1,180.00	0.5	590 review redline and revise meet and confer letter re discovery responses
5/6/2022	\$770.00	0.2	154 Call with opposing counsel regarding discovery meet and confer
5/9/2022	\$770.00	0.3	231 Emails to opposing counsel regarding meet and confer call
	\$770.00	0.2	154 Emails to opposing counsel setting up meet and confer call
	\$770.00	0.5	385 Meet and confer call with opposing counsel regarding discovery responses
	-		231 Review of email from opposing counsel regarding document production and continued meet and confer, response to same
	-	_	693 Review of Defendant's production, emails to opposing counsel regarding deficiencies in same
-	-		154 Email to opposing counsel regarding discovery meet and confer letter
	-		539 Emails to opposing counsel regarding discovery issues; review of letter from Defendant regarding same
	-	-	385 Review of filings case
<del></del>	-	_	154 Review of case status and deadlines
	-	_	45 Review discovery requests, docket same
		-	462 Voicemail and call to client regarding
5/25/2022	\$770.00	1.5	Review of Defendant's discovery requests, internal emails and email to cocounsel regarding same, email to opposing counsel regarding deposition scheduling
5/25/2022	\$770.00	0.7	539 Review of and edits to draft deposition notices, internal emails regarding same
	-		45 Email re discovery responses
5/25/2022	\$450.00	0.3	135 Draft 30b6 and 30b1 NODs
			45 Finalize and e-serve dep notices
5/25/2022	\$675.00	0.2	Review Avantus' written discovery to Plf. Read and respond to email from Hashmall re: Avantus discovery requests
5/27/2022	\$770.00	0.2	154 Review of email from opposing counsel regarding depositions, document meet and confer
5/31/2022	\$770.00	0.3	Email to opposing counsel regarding continuing meet and confer
6/2/2022	\$450.00	1.2	Set up response templates for RFPs, RFAs, Interrogs, and prepare the docs for review.
6/3/2022	\$865.00	0.1	86.5 Discuss case status with internal litigation team.
6/3/2022			231 Email exchange with opposing counsel regarding discovery meet and confer
6/3/2022	\$770.00	0.2	154 Litigation team meeting
6/3/2022		-	693 Review of and edits to Plaintiff's draft written discovery responses, internal emails regarding same
6/3/2022		-	1125 Draft discovery responses, review docs, draft summary of outstanding questions
6/3/2022			45 Email client to
6/3/2022	-	-	118 call with entire litigation team re case status, upcoming deadlines and next steps in litigation
			45 Emails to set up call
		-	225 Prepare for Call, review notes, etc
6/7/2022		_	360 Conduct call, document notes for formal responses.
=	\$450.00	-	135 Review files for on call, email with J Hashmall re same
	4/13/2022 4/20/2022 4/20/2022 4/25/2022 5/2/2022 5/3/2022 5/4/2022 5/4/2022 5/13/2022 5/16/2022 5/18/2022 5/18/2022 5/25/2022 5/24/2022 5/24/2022 5/25/2022 5/31/2022 6/3/2022 6/3/2022 6/3/2022 6/3/2022 6/3/2022 6/3/2022 6/3/2022 6/3/2022 6/3/2022 6/7/2022	4/11/2022       \$770.00         4/12/2022       \$770.00         4/12/2022       \$770.00         4/12/2022       \$770.00         4/12/2022       \$450.00         4/13/2022       \$770.00         4/20/2022       \$770.00         4/20/2022       \$450.00         4/25/2022       \$770.00         4/29/2022       \$770.00         5/2/2022       \$770.00         5/3/2022       \$770.00         5/3/2022       \$770.00         5/3/2022       \$770.00         5/4/2022       \$770.00         5/4/2022       \$770.00         5/4/2022       \$770.00         5/4/2022       \$770.00         5/12/2022       \$770.00         5/12/2022       \$770.00         5/18/2022       \$770.00         5/18/2022       \$770.00         5/18/2022       \$770.00         5/23/2022       \$770.00         5/24/2022       \$770.00         5/24/2022       \$770.00         5/25/2022       \$770.00         5/25/2022       \$770.00         5/25/2022       \$770.00         5/25/2022       \$770.00         5/25/2022 <td>4/11/2022       \$770.00       0.2         4/12/2022       \$770.00       0.5         4/12/2022       \$770.00       0.5         4/12/2022       \$770.00       0.2         4/12/2022       \$450.00       0.2         4/13/2022       \$770.00       0.3         4/20/2022       \$470.00       0.1         4/25/2022       \$770.00       0.4         4/29/2022       \$770.00       1.3         5/2/2022       \$770.00       1.4         5/3/2022       \$770.00       1.4         5/3/2022       \$770.00       1.1         5/3/2022       \$770.00       0.1         5/3/2022       \$770.00       0.1         5/3/2022       \$770.00       0.1         5/4/2022       \$770.00       0.2         5/6/2022       \$770.00       0.2         5/9/2022       \$770.00       0.2         5/12/2022       \$770.00       0.2         5/13/2022       \$770.00       0.2         5/18/2022       \$770.00       0.5         5/23/2022       \$770.00       0.2         5/23/2022       \$770.00       0.2         5/24/2022       \$770.00       <t< td=""></t<></td>	4/11/2022       \$770.00       0.2         4/12/2022       \$770.00       0.5         4/12/2022       \$770.00       0.5         4/12/2022       \$770.00       0.2         4/12/2022       \$450.00       0.2         4/13/2022       \$770.00       0.3         4/20/2022       \$470.00       0.1         4/25/2022       \$770.00       0.4         4/29/2022       \$770.00       1.3         5/2/2022       \$770.00       1.4         5/3/2022       \$770.00       1.4         5/3/2022       \$770.00       1.1         5/3/2022       \$770.00       0.1         5/3/2022       \$770.00       0.1         5/3/2022       \$770.00       0.1         5/4/2022       \$770.00       0.2         5/6/2022       \$770.00       0.2         5/9/2022       \$770.00       0.2         5/12/2022       \$770.00       0.2         5/13/2022       \$770.00       0.2         5/18/2022       \$770.00       0.5         5/23/2022       \$770.00       0.2         5/23/2022       \$770.00       0.2         5/24/2022       \$770.00 <t< td=""></t<>

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Hibray, Jean	6/8/2022	\$450.00			Email with J Fena re history of docs
Hibray, Jean	6/8/2022	\$450.00			Update written discovery responses , email with J Hashmall re same
Hashmall, Joseph	6/8/2022	\$770.00			Review of Plaintiff's draft written discovery responses, edits to same, internal emails regarding same
Hashmall, Joseph	6/8/2022	\$770.00			Email to opposing counsel regarding outstanding discovery matters
Hashmall, Joseph	6/13/2022	\$770.00			Review of Defendant's email regarding outstanding discovery issues, email to opposing counsel regarding same
Hashmall, Joseph	6/13/2022	\$770.00	0.2	154	Call with opposing counsel regarding database discovery
Hashmall, Joseph	6/15/2022	\$770.00	0.3	231	Meet and confer call with opposing counsel
Hashmall, Joseph	6/15/2022	\$770.00	0.3	231	Follow up emails to opposing counsel after discovery meet and confer
Hashmall, Joseph	6/15/2022	\$770.00	0.2	154	Email to Michelle Drake regarding next steps in case
Drake, Eleanor Michelle	6/15/2022	\$1,180.00	0.5	590	review D filings, email J Hashmall re set time to discuss
Hashmall, Joseph	6/16/2022	\$770.00	1.3	1001	Research regarding , drafting memo regarding same
Hashmall, Joseph	6/16/2022	\$770.00	0.2	154	Call with Michelle Drake regarding next steps in case
Hibray, Jean	6/16/2022	\$450.00	0.1	45	Email Lodge re
Drake, Eleanor Michelle	6/16/2022	\$1,180.00	0.5	590	review file, meet with J Hashmall re next steps
Hashmall, Joseph	6/17/2022	\$770.00	0.2	154	Internal email regarding Plaintiff's written discovery responses
Hibray, Jean	6/17/2022	\$450.00	0.2	90	Emails with attorneys re status of response review
Hibray, Jean	6/17/2022	\$450.00	_		Proof, prepare clean copy, draft and send client with
Hibray, Jean	6/17/2022	\$450.00			Email with J Hashmall re docs
Hibray, Jean	6/17/2022	\$450.00		135	Review def prod, set up space in file for same, email J Hashmall
Hashmall, Joseph	6/20/2022	\$770.00			Call with Hans Lodge regarding Plaintiffs discovery responses
Hashmall, Joseph	6/20/2022	\$770.00			Review of Hans Lodge's edits to Plaintiffs discovery responses, internal emails regarding same
Hashmall, Joseph	6/20/2022	\$770.00			Downloading and attempting to access Defendant's document production, internal email regarding same
Lodge, Hans W	6/20/2022	\$675.00			Draft and edit Plf.'s Objections and Answers to Def.'s ROGs, Set I.
Lodge, Hans W	6/20/2022	\$675.00			Draft and edit Plf.'s Objections and Responses to Def.'s RFPs, Set I.
Lodge, Hans W	6/20/2022	\$675.00			Draft and edit PIf.'s Objections and Responses to Def.'s RFAs, Set I.
Hashmall, Joseph	6/21/2022	\$770.00			Review of Defendant's production, email to opposing counsel regarding same
Hashmall, Joseph	6/21/2022	\$770.00			Email to opposing counsel regarding outstanding discovery issues
Hibray, Jean	6/21/2022	\$450.00			De-duplicate , review for production. Email with J Hashmall re same.
Hashmall, Joseph	6/22/2022	\$770.00			Email to opposing counsel regarding deposition dates
Hashmall, Joseph	6/22/2022	\$770.00			Review of documents for production, internal email regarding same
Hibray, Jean	6/22/2022	\$450.00			Emails re client , outreach to client
		-			
Hibray, Jean	6/22/2022	\$450.00			Scrub, Bates docs for production, email with J Hashmall re same
Hibray, Jean	6/23/2022	\$450.00			Proof, finalize written responses, e-serve, with production
Hashmall, Joseph	6/24/2022	\$770.00			Emails to opposing counsel regarding outstanding discovery matters
Hashmall, Joseph	6/29/2022	\$770.00			Email exchange with opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	6/29/2022	\$770.00 \$770.00			Call with opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	6/30/2022	\$770.00			Email to opposing counsel regarding document production, deposition scheduling
Hashmall, Joseph	6/30/2022	\$770.00			Review of Defendant's revised interrogatory response, drafting proposed data query plan, internal email regarding same
Hashmall, Joseph	7/1/2022	\$770.00			Internal emails and email to opposing counsel regarding database discovery requests
Hashmall, Joseph	7/1/2022	\$770.00			Email to opposing counsel regarding deposition schedule
Hashmall, Joseph	7/5/2022	\$770.00			Review of draft to client
Hibray, Jean	7/5/2022	\$450.00			Draft, finalize and send
Hashmall, Joseph	7/6/2022	\$770.00			Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	7/7/2022	\$770.00			Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	7/7/2022	\$770.00			Litigation team meeting
Albanese, John	7/7/2022	\$865.00			Discuss case with litigaiton team
Drake, Eleanor Michelle	7/7/2022	\$1,180.00			team meeting re case status, upcoming deadlines, and next steps in litigation
Hashmall, Joseph	7/8/2022	\$770.00	0.2	154	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	7/13/2022	\$770.00	0.3	231	Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	7/18/2022	\$770.00	0.5	385	Email to opposing counsel regarding depositions and data production
Gionnette, Julie	7/18/2022	\$285.00	0.1	28.5	download and review docket entries
Gionnette, Julie	7/20/2022	\$285.00	0.1	28.5	download and review docket entry

Hachmall Jacoph	7/21/2022	\$770.00	0.2	154 Email to apposing sourced regarding outstanding discovery issues
Hashmall, Joseph	7/21/2022			154 Email to opposing counsel regarding outstanding discovery issues
Hashmall, Joseph	7/22/2022	\$770.00	0.7	539 Email to opposing counsel regarding deposition scheduling, internal email regarding same, pre-service review of revised deposition notices
Hibray, Jean	7/22/2022	\$450.00	0.5	Prepare amended NODs, finalize, e-serve. Send to Lexitas for scheduling, docket same.
Hashmall, Joseph	7/29/2022	\$770.00	0.6	462 Email exchange with opposing counsel regarding data production
Hashmall, Joseph	7/29/2022	\$770.00	0.3	231 Downloading Defendant's suppliemental production, internal email regarding same
Hibray, Jean	7/29/2022	\$450.00	0.2	90 Review def prod for file
Hashmall, Joseph	8/1/2022	\$770.00	0.2	154 Internal email regarding plaintiff's deposition scheduling
Hashmall, Joseph	8/1/2022	\$770.00	0.8	Review of Defendant's production, email exchange with opposing counsel regarding technical issues regarding same
Hibray, Jean	8/1/2022	\$450.00	0.1	45 Check Bates list from last prod, respond to attorney re same
Hibray, Jean	8/1/2022	\$450.00	0.2	90 Extract replacement prod, email with attorney re same
Hashmall, Joseph	8/2/2022	\$770.00	0.1	77 Litigation team meeting
Albanese, John	8/2/2022	\$865.00	0.1	86.5 Meet with litigaiton team to discuss case strategy
Drake, Eleanor Michelle	8/2/2022	\$1,180.00	0.1	118 team meeting to discuss next steps in litigation and upcoming deadlines
Hibray, Jean	8/3/2022	\$450.00	0.1	45 Client
Hibray, Jean	8/3/2022	\$450.00	0.1	45 Email re upcoming logistics for depos
Hashmall, Joseph	8/4/2022	\$770.00	-	154 Internal emails regarding scheduling for Plaintiff's deposition
Hibray, Jean	8/4/2022	\$450.00	-	180 Call with client re Email with J Hashmall re same.
Hashmall, Joseph	8/5/2022	\$770.00	-	231 Email exchange with opposing counsel regarding outstanding discovery issues
Hibray, Jean	8/5/2022	\$450.00	-	45 Email client
Hashmall, Joseph	8/8/2022	\$770.00	-	1386 Review of documents produced in case for use as exhibits in upcoming depositions
Hashmall, Joseph	8/8/2022	\$770.00	-	154 Email exchange with opposing counsel regarding data production
Gionnette, Julie	8/8/2022	\$285.00	$\rightarrow$	57 download and review docket entries
Hashmall, Joseph	8/9/2022	\$770.00	$\rightarrow$	154 Call with local counsel regarding upcoming Rule 16 conference
Hashmall, Joseph	8/9/2022	\$770.00	-	1540 Review of Defendant's data production, emails with opposing counsel regarding re-production of same
Hashmall, Joseph	8/9/2022	\$770.00	$\rightarrow$	308 Emails with Michelle Drake regarding next steps in case
Hashmall, Joseph	8/9/2022	\$770.00	-	539 Review of documents in case in advance of next week's mediations
Gionnette, Julie	8/9/2022	\$285.00	-	57 download and review docket entries
Hashmall, Joseph	8/10/2022	\$770.00	$\overline{}$	3311 Review of documents and case materials for use in depositions
Hashmall, Joseph	8/11/2022	\$770.00	-	154 Email to opposing counsel regarding scheduling Plaintiff's deposition
Hashmall, Joseph	8/11/2022	\$770.00	-	154 Email to opposing counsel regarding additional production from Defendant
Hashmall, Joseph	8/11/2022	\$770.00	$\rightarrow$	154 Call with Michelle Drake regarding upcoming Rule 16 conference
Hashmall, Joseph	8/11/2022	\$770.00	$\overline{}$	2310 Reviewing exhibits and outlining for next week's depositions
		-	-	
Hibray, Jean	8/11/2022	\$450.00 \$770.00	-	45 Emails re upcoming depos  385 Review of case file in advance of Rule 16 hearing
Hashmall, Joseph	8/12/2022	<u>'</u>	-	· ·
Hashmall, Joseph	8/12/2022	\$770.00	-	231 Participate in telephonic Rule 16 hearing
Hashmall, Joseph	8/12/2022	\$770.00	-	539 Downloading and reviewing Defendant's most recent production
Hashmall, Joseph	8/12/2022	\$770.00	$\rightarrow$	385 Review of Defendant's responses and objections to Rule 30b6 notice, email exchange with opposing counsel regarding same
Hashmall, Joseph	8/12/2022	\$770.00	-	2541 Outlining and organizing exhibits in advance of next week's edits
Gionnette, Julie	8/12/2022	\$285.00	$\rightarrow$	114 download and review scheduling order; calendar all deadlines
Hibray, Jean	8/12/2022	\$450.00	$\overline{}$	90 Review new def prod, submit to Ricoh
Hibray, Jean	8/12/2022	\$450.00	-	45 Email client
Drake, Eleanor Michelle	8/12/2022	\$1,180.00	-	472 attend rule 16 scheduling conference
Hashmall, Joseph	8/15/2022	\$770.00	$\rightarrow$	2002 Conducting deposition of Delaporta
Hashmall, Joseph	8/15/2022	\$770.00	$\rightarrow$	616 Prepping for upcoming deposition of Delaporta
Hashmall, Joseph	8/15/2022	\$770.00	$\overline{}$	616 Drafting letter to opposing counsel following up on deposition of Delaporta
Hashmall, Joseph	8/15/2022	\$770.00	-	Preparing for upcoming deposition of Brown
Gionnette, Julie	8/15/2022	\$285.00	-	28.5 download and review docket entry
Hibray, Jean	8/15/2022	\$450.00	-	90 Monitor deposition initiation for tech issues
Hashmall, Joseph	8/16/2022	\$770.00	$\overline{}$	1771 Conduct deposition of Brown
Hashmall, Joseph	8/16/2022	\$770.00	-	1155 Prepare for deposition of Brown
Hashmall, Joseph	8/16/2022	\$770.00	0.6	, email to Michelle Drake regarding same

Hashmall, Joseph	8/16/2022	\$770.00 0.2	154 Email to client regarding
Hashmall, Joseph	8/17/2022	\$770.00 0.2	693 Drafting subpeanas review of case materials for use in same
Hibray, Jean	8/17/2022	\$450.00 0.2	90 Prepare subpoena forms for credit bureaus
Hashmall, Joseph	8/18/2022	\$770.00 0.2	154 Call with opposing counsel regarding additional data production
Hashmall, Joseph	8/18/2022		154 Call with opposing course regarding additional data production  154 Internal email regarding Plaintiff's upcoming deposition
	<u> </u>	\$770.00 0.2	Review of Michelle Drake's edits to draft subpoena to Experian Equifax and Transunion, further edits to same; internal emails in advance of
Hashmall, Joseph	8/18/2022	\$770.00 0.9	service of same
Drake, Eleanor Michelle	8/18/2022	\$1,180.00 0.4	472 review redline and revise subpoenas
Hibray, Jean	8/18/2022	\$450.00 0.9	405 Update subpoena forms, prepare exhibit A's, prepare packets, and serve on opposing. Send to Metro
Gionnette, Julie	8/25/2022	\$285.00 0.2	57 download Delaporta transcripts and exhibits and save to iManage
Hibray, Jean	8/25/2022	\$450.00 0.1	45 Review protective order, docket confidential deadline for transcript
Gionnette, Julie	8/26/2022	\$285.00 0.1	28.5 save Brown transcripts to iManage
Hashmall, Joseph	8/29/2022	\$770.00 1.2	924 Review of Defendant's supplemental data production, email to opposing counsel regarding same
Gionnette, Julie	8/29/2022	\$285.00 0.2	57 download Brown deposition exhibits and save to iManage
Hashmall, Joseph	8/30/2022	\$770.00 0.3	231 Email exchange with counsel for Experian regarding subpoena response
Hashmall, Joseph	8/30/2022	\$770.00 0.6	462 Email exchange with expert data review and accessibility
Hibray, Jean	8/30/2022	\$450.00 0.2	90 Review video files from court reporting agency
Hashmall, Joseph	8/31/2022	\$770.00 0.6	462 Email exchange with expert regarding
Hashmall, Joseph	8/31/2022	\$770.00 0.1	77 Internal email regarding Plaintiff's deposition
Hashmall, Joseph	8/31/2022	\$770.00 0.7	539 Review of case file, internal emails regarding next steps in discovery and settlement
Hashmall, Joseph	8/31/2022	\$770.00 0.2	154 Email to client regarding
Hibray, Jean	8/31/2022	\$450.00 0.1	45 Email J Hashmall re
Hashmall, Joseph	9/1/2022	\$770.00 0.3	231 Call and email with client regarding
Hashmall, Joseph	9/1/2022	\$770.00 0.8	616 Drafting demand letter, review of
Hashmall, Joseph	9/1/2022	\$770.00 0.2	154 Email to opposing counsel regarding upcoming plaintiff deposition
Hashmall, Joseph	9/2/2022	\$770.00 0.2	154 Email exchange with opposing counsel regarding Plaintiff's deposition
Hashmall, Joseph	9/5/2022	\$770.00 0.3	231 Email to opposing counsel regarding data production
Hashmall, Joseph	9/5/2022	\$770.00 0.2	154 Internal emails regarding settlement demand
Hashmall, Joseph	9/5/2022	\$770.00 0.5	385 Drafting email to client regarding
Hashmall, Joseph	9/6/2022	\$770.00 0.5	385 Call with client regarding
Hashmall, Joseph	9/6/2022	\$770.00 0.3	154 Email to opposing counsel regarding data discovery
Hashmall, Joseph	9/6/2022	\$770.00 0.2	231 Internal emails regarding settlement demand
Hibray, Jean	9/6/2022	\$450.00 0.2	90 Pull for J Hashmall
Hashmall, Joseph	9/7/2022	\$770.00 0.6	462 Internal emails regarding demand letter, editing and sending letter
Hashmall, Joseph	9/7/2022	\$770.00 0.0	154 Internal email regarding logistics for upcoming deposition
	· · ·	· ·	
Hibray, Jean	9/7/2022	\$450.00 0.9 \$450.00 0.5	405 Prepare a tablet for use for depo, run updates, charging, etc
Hibray, Jean Drake, Eleanor Michelle	9/7/2022	· · · · · · · · · · · · · · · · · · ·	Prepare and travel to/from FedEx with tablet for client, email instructions and credentials review redline and revise settlement proposal
	9/7/2022	\$1,180.00 0.5	
Hashmall, Joseph	9/8/2022	\$770.00 0.2	154 Email to counsel for Equifax regarding subpoena response
Hibray, Jean	9/8/2022	\$450.00 0.1	45 Review emails granting extensions, docket accordingly
Hashmall, Joseph	9/12/2022	\$770.00 0.1	77 Litigation team meeting
Albanese, John	9/12/2022	\$865.00 0.1	86.5 Meet with internal case team regarding case strategy.
Drake, Eleanor Michelle	9/12/2022	\$1,180.00 0.1	118 team meeting re next steps in litigation
Hashmall, Joseph	9/13/2022	\$770.00 0.2	154 Email to opposing counsel regarding data production
Hashmall, Joseph	9/14/2022	\$770.00 0.9	693 Review of and edits to draft declaration regarding data production, email to opposing counsel regarding same
Hashmall, Joseph	9/15/2022	\$770.00 0.5	385 Review of edits to draft declaration regarding data, email to opposing counsel regarding same
Hashmall, Joseph	9/19/2022	\$770.00 0.2	154 Internal email regarding response to letter regarding Transunion subpoena
Hibray, Jean	9/19/2022	\$450.00 0.1	45 Review TU subpoena letter, email J Hashmall
Hashmall, Joseph	9/20/2022	\$770.00 0.1	77 Call with client
Hashmall, Joseph	9/20/2022	\$770.00 0.1	77 Email to transunion regarding subpoena response
Hibray, Jean	9/20/2022	\$450.00 0.2	90 Prepare and send PII to TU
Hashmall, Joseph	9/21/2022	\$770.00 0.2	154 Email to counsel for Experian regarding subpoena response deadline

Hashmall, Joseph	9/22/2022	\$770.00		770 Review of file in advance of call
Hashmall, Joseph	9/22/2022	\$770.00		385 Call with Plaintiff
Hashmall, Joseph	9/23/2022	\$770.00		Emails to client and opposing counsel regarding logistics for Plaintiff's deposition
Hashmall, Joseph	9/24/2022	\$770.00	_	Emails and calls with client and client's wife regarding
Hashmall, Joseph	9/26/2022	\$770.00	3.5	2695 Defend Plaintiff's deposition
Hashmall, Joseph	9/26/2022	\$770.00	0.8	616 Deposition preparation with Plaintiff
Hashmall, Joseph	9/26/2022	\$770.00	0.8	616 Review deposition
Hashmall, Joseph	9/26/2022	\$770.00	0.4	Review of subpoena response from Equifax, emails setting up meet and confer regarding same
Hashmall, Joseph	9/27/2022	\$770.00	0.3	231 Meet and confer call with Equifax regarding subpoena response
Hashmall, Joseph	9/27/2022	\$770.00	0.4	308 Call with Hans Lodge regarding
Gionnette, Julie	9/27/2022	\$285.00	0.2	57 download and review docket entries
Hibray, Jean	9/27/2022	\$450.00	0.1	45 Review email re: extension, docket accordingly
Hashmall, Joseph	9/28/2022	\$770.00	0.2	154 Email exchange with Experian counsel regarding extension of time to respond to subpoena
Hashmall, Joseph	9/28/2022	\$770.00	0.7	Review of file for confidential designations and signature pages, email to opposing counsel regarding same
Hashmall, Joseph	9/28/2022	\$770.00	3.5	2695 Researching and drafting motion for class certification
Hashmall, Joseph	9/29/2022	\$770.00	0.2	154 Call with client regarding
Hashmall, Joseph	9/29/2022	\$770.00	_	231 Call with Michelle Drake regarding
Hashmall, Joseph	9/29/2022	\$770.00		77 Internal email regarding deposition transcript
Drake, Eleanor Michelle	9/29/2022	\$1,180.00		354 call with J. Hashmall re next steps in litigation
Hashmall, Joseph	9/30/2022	\$770.00		154 Email to counsel for Experian regarding subpoena response
Hashmall, Joseph	9/30/2022	\$770.00		924 Drafting brief in support of class certification
Hashmall, Joseph	10/3/2022	\$770.00		77 Call with opposing counsel regarding deposition transcript issues
Hashmall, Joseph	10/3/2022	\$770.00		462 Researching and drafting motion for class certification
Hashmall, Joseph	10/4/2022	\$770.00		616 Review of Defendant's data production, email to expert regarding review of same
Hashmall, Joseph	10/4/2022	\$770.00		1694 Drafting and researching motion for class certification
Hashmall, Joseph	10/5/2022	\$770.00		1617 Review of deposition transcripts for use in class certification
Hashmall, Joseph	10/5/2022	\$770.00		1540 Researching and drafting motion for class certification
Hashmall, Joseph	10/6/2022	\$770.00		77 Litigation team meeting
Hashmall, Joseph	10/6/2022	\$770.00	3	2310 Drafting motion for class certification
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Albanese, John Drake, Eleanor Michelle	10/6/2022	\$865.00 \$1,180.00		86.5 Call with internal team regarding case strategy
	10/6/2022	. ,		118 team meeting re next steps in litigation
Hashmall, Joseph	10/7/2022	\$770.00		1694 Completing first draft of motion for class certification, internal email attaching same
Hashmall, Joseph	10/10/2022	\$770.00		924 Review of class data, emails with expert regarding
Hashmall, Joseph	10/10/2022	\$770.00		693 Revisions to draft class certification brief to reflect , internal email regarding same
Hashmall, Joseph	10/10/2022	\$770.00		77 Email to opposing conusel regarding confidential designations
Hashmall, Joseph	10/12/2022	\$770.00	$\overline{}$	Review of email from opposing counsel regarding confidential desigations, email in response to same
Hashmall, Joseph	10/12/2022	\$770.00		539 Edits to motion for class certification, internal email attaching same
Hashmall, Joseph	10/14/2022	\$770.00		Review of Plaintiff's deposition transcript, email to client regarding
Hashmall, Joseph	10/14/2022	\$770.00	$\overline{}$	77 Call with Michelle Drake regarding motion for class certification
Drake, Eleanor Michelle	10/14/2022	\$1,180.00	$\rightarrow$	review redline and revise draft memo in support of class certification
Hashmall, Joseph	10/17/2022	\$770.00	$\rightarrow$	2156 Review of Michelle Drake's edits to motion for class certification, further edits to same
Hashmall, Joseph	10/17/2022	\$770.00	$\rightarrow$	231 Call with Michelle Drake regarding motion for class certification
Hashmall, Joseph	10/17/2022	\$770.00		Review of draft expert declaration in support of motion for class certification, internal emails regarding same
Hashmall, Joseph	10/17/2022	\$770.00	0.2	154 Internal emails regarding deposition errata sheet
Hibray, Jean	10/17/2022	\$450.00	0.3	135 Prepare declaration for cert
Hibray, Jean	10/17/2022	\$450.00	0.2	90 Set up read and sign for docket deadlines
Drake, Eleanor Michelle	10/17/2022	\$1,180.00	1	1180 call with J. hashmall re class cert brief, review send for incorporation into brief
Hashmall, Joseph	10/18/2022	\$770.00	0.5	385 Edits to brief for class certification, internal emails regarding same
Hashmall, Joseph	10/18/2022	\$770.00	1	770 Review of client's deposition transcripts for confidential designations
Hibray, Jean	10/18/2022	\$450.00	$\overline{}$	90 Draft and send email to reporter & opposing with errata & designations
Hibray, Jean	10/18/2022	\$450.00		90 Prepare highlighted for redaction versions of depo transcripts for J Hashmall
Hibray, Jean	10/18/2022	\$450.00		90 Review latest cert memo, and update
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Hashmall, Joseph	10/19/2022	\$770.00	$\rightarrow$	693 Edits to motion for class certification
Hashmall, Joseph	10/21/2022	\$770.00		231 Call with opposing counsel regarding Defendant's proposed discovery
Hashmall, Joseph	10/21/2022	\$770.00	0.7	Review of Michelle Drake's edits to motion for class certification, internal emails regarding same
Hashmall, Joseph	10/21/2022	\$770.00	0.5	385 Internal emails regarding Defendant's deposition notices, email to opposing counsel regarding same
Hashmall, Joseph	10/21/2022	\$770.00	0.2	154 Internal email regarding additional interrogatory in case
Hashmall, Joseph	10/21/2022	\$770.00	0.7	539 Edits to draft motion for class certification
Drake, Eleanor Michelle	10/21/2022	\$1,180.00	3.6	4248 review redline and revise memo in support of class certification
Hashmall, Joseph	10/24/2022	\$770.00	0.5	385 Call with client and wife regarding
Hashmall, Joseph	10/24/2022	\$770.00	0.3	Voicemail and email with client regarding
Hashmall, Joseph	10/24/2022	\$770.00	3.2	2464 Review of Michelle Drake's edits to class certification brief, further research and edits to same
Hashmall, Joseph	10/25/2022	\$770.00	0.3	Email exchange with opposing counsel regarding Wendy Berryman deposition
Hashmall, Joseph	10/25/2022	\$770.00	0.3	Review of and edit to draft additional interrogatory, internal email regarding service of same
Hashmall, Joseph	10/25/2022	\$770.00	0.5	385 Edits to draft class certification brief, internal email regarding same
Hibray, Jean	10/25/2022	\$450.00	-	90 Review def's subpoenas, Notices, docketing of same
Hibray, Jean	10/25/2022	\$450.00	-	180 Prepare Interrogatory II, finalize and e-serve same
Hashmall, Joseph	10/26/2022	\$770.00	-	154 Internal email regarding
Hibray, Jean	10/26/2022	\$450.00	-	135 Prepare letter, send Docusigns
Hashmall, Joseph	10/27/2022	\$770.00	-	462 Review of Berrymans, email to Berrymans regarding
Hashmall, Joseph	10/28/2022	\$770.00	-	308 Emails with Wendy Berryman regarding
Hashmall, Joseph	10/28/2022	\$770.00	-	154 Internal email regarding
Hashmall, Joseph	10/20/2022	\$770.00	-	154 Emails with Wendy Berryman regarding
Hashmall, Joseph	11/1/2022	\$770.00	-	462 Emails and call with Wendy Berryman
Hashmall, Joseph	11/2/2022	\$770.00	-	77 Litigation team meeting
Albanese, John	11/2/2022	\$865.00	$\rightarrow$	86.5 Meet with team regarding case stategy.
Drake, Eleanor Michelle	11/2/2022	\$1,180.00	-	118 team meeting re next steps in litigation
Hashmall, Joseph	11/7/2022	\$770.00	-	154 Email to opposing counsel regarding Trident Home Loan deposition
Hashmall, Joseph	11/8/2022	\$770.00	-	Email exchange with opposing counsel regarding discovery schedule
Hashmall, Joseph	11/8/2022	\$770.00	-	Emails to Wendy Berryman regarding
Gionnette, Julie	11/8/2022	\$285.00	-	28.5 download and review docket entry
Hashmall, Joseph	11/9/2022	\$770.00	-	154 Email to Ms. Berryman regarding
Hashmall, Joseph	11/9/2022	\$770.00	0.2	154 Email exchange with opposing counsel regarding discovery schedule
Hashmall, Joseph	11/10/2022	\$770.00	0.8	616 Emails with Wendy Berryman regarding , internal emails regarding same
Hashmall, Joseph	11/10/2022	\$770.00	0.3	231 Call with Wendy Berryman regarding
Hibray, Jean	11/10/2022	\$450.00	0.2	90 Emails re W Berryman
Hibray, Jean	11/10/2022	\$450.00	0.4	180 Prepare FedEx of webcam, travel to/from and deliver
Hashmall, Joseph	11/11/2022	\$770.00	0.2	154 Email to Wendy Berryman regarding
Hashmall, Joseph	11/14/2022	\$770.00	0.7	539 Deposition preparation call and emails with Wendy Berryman
Hashmall, Joseph	11/14/2022	\$770.00	2.3	1771 Defend deposition with Wendy Berryman
Hashmall, Joseph	11/21/2022	\$770.00	-	154 Review of and edits to to client
Hibray, Jean	11/21/2022	\$450.00	-	90 Draft letter, finalize and send
Hashmall, Joseph	11/28/2022	\$770.00	-	308 Emails with opposing counsel regarding loan officer deposition
Hashmall, Joseph	11/28/2022	\$770.00	-	385 Internal emails regarding motion for class certification
Hashmall, Joseph	11/28/2022	\$770.00	-	154 Review of Defendant's interrogatory response
Hibray, Jean	11/28/2022	\$450.00	-	45 Email W Berryman re
Hashmall, Joseph	11/29/2022	\$770.00	-	616 Downloading and revewing documents produced by lender, internal emails and email to opposing counsel regarding same
Gionnette, Julie	11/29/2022	\$285.00	-	28.5 download and review docket entry
Drake, Eleanor Michelle	11/29/2022	\$1,180.00	$\rightarrow$	354 review documents produced by Trident
			_	
Hashmall, Joseph	11/30/2022	\$770.00 \$770.00	-	924 Review of Wendy Berryman transcript for errata, internal emails regarding same
Hashmall, Joseph	11/30/2022	\$770.00 \$770.00	-	1694 Attend Aguado deposition
Hashmall, Joseph	11/30/2022	\$770.00	$\rightarrow$	1001 Prepare for Aguado deposition
Hibray, Jean	11/30/2022	\$450.00	_	90 Emails re W Berryman transcript, docket same
Hibray, Jean	11/30/2022	\$450.00	0.1	45 Email

Hashmall, Joseph         12/5/2022         \$770           Hibray, Jean         12/7/2022         \$450           Hashmall, Joseph         12/12/2022         \$770           Albanese, John         12/12/2022         \$865           Drake, Eleanor Michelle         12/12/2022         \$1,180           Hashmall, Joseph         12/20/2022         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Drake, Eleanor Michelle         1/6/2023         \$770           Hashmall, Joseph         1/9/2023         \$770           Hashmall, Joseph         1/9/2023         \$770           Lodge, Hans W         1/9/2023         \$675           Drake, Eleanor Michelle         1/11/2023         \$1,180           Hashmall, Joseph         1/9/2023         \$770           Drake, Eleanor Michelle         1/11/2023         \$770           Hashmall, Joseph         1/12/2023         \$770           Hashmall, Joseph         1/13/2023         \$770           Hashmall, Joseph         1/13/2023         \$770 </th <th>00 0. 00 0. 00 0. 00 1. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.</th> <th>3 231 1 45 1 77 1 86.5 2 236 2 154 3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770 7 472.5</th> <th>Call and emails with Wendy Berryman regarding Internal emails regarding plan for moving for class certification Submit transcript errata to all Litigation team meeting Meet with team regarding case strategy team meeting to discuss upcoming deadlines and approach Email to court reporter regarding Aguado transcript Email exchange with court reporter regarding Aguado deposition transcript Review of decision in Edits to draft Calls and emails with expert regarding Edits to draft motion for class certification Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation Review of Calls in support of class certification, internal email regarding Revisions to draft brief in support of class certification, internal email regarding same Read and respond to emails from EMD and Hashmall re:</th>	00 0. 00 0. 00 0. 00 1. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	3 231 1 45 1 77 1 86.5 2 236 2 154 3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770 7 472.5	Call and emails with Wendy Berryman regarding Internal emails regarding plan for moving for class certification Submit transcript errata to all Litigation team meeting Meet with team regarding case strategy team meeting to discuss upcoming deadlines and approach Email to court reporter regarding Aguado transcript Email exchange with court reporter regarding Aguado deposition transcript Review of decision in Edits to draft Calls and emails with expert regarding Edits to draft motion for class certification Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation Review of Calls in support of class certification, internal email regarding Revisions to draft brief in support of class certification, internal email regarding same Read and respond to emails from EMD and Hashmall re:
Hibray, Jean 12/7/2022 \$450 Hashmall, Joseph 12/12/2022 \$770 Albanese, John 12/12/2022 \$865 Drake, Eleanor Michelle 12/12/2022 \$1,180 Hashmall, Joseph 12/20/2022 \$770 Hashmall, Joseph 12/21/2022 \$770 Hashmall, Joseph 16/2023 \$770 Hashmall, Joseph 1/6/2023 \$770 Hashmall, Joseph 1/6/2023 \$770 Drake, Eleanor Michelle 1/6/2023 \$770 Drake, Eleanor Michelle 1/6/2023 \$770 Lodge, Hans W 1/9/2023 \$770 Drake, Eleanor Michelle 1/9/2023 \$770 Lodge, Hans W 1/9/2023 \$770 Drake, Eleanor Michelle 1/11/2023 \$770 Hashmall, Joseph 1/9/2023 \$770 Lodge, Hans W 1/9/2023 \$770 Hashmall, Joseph 1/12/2023 \$770 Hashmall, Joseph 1/12/2023 \$770 Hashmall, Joseph 1/13/2023 \$770 Hashmall, Joseph 1/13/2023 \$770 Hashmall, Joseph 1/13/2023 \$770 Hibray, Jean 1/13/2023 \$450	00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	1 45 1 77 1 86.5 2 236 2 154 3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770 7 472.5	Submit transcript errata to all  Litigation team meeting  Meet with team regarding case strategy team meeting to discuss upcoming deadlines and approach  Email to court reporter regarding Aguado transcript  Email exchange with court reporter regarding Aguado deposition transcript  Review of decision in  Edits to draft  , calls and emails with expert regarding  Edits to draft motion for class certification  Litigation team meeting  team meeting to review upcoming deadlines and next steps in litigation  Review of meeting in the mean of the me
Hashmall, Joseph         12/12/2022         \$770           Albanese, John         12/12/2022         \$865           Drake, Eleanor Michelle         12/12/2022         \$1,180           Hashmall, Joseph         12/20/2022         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Drake, Eleanor Michelle         1/6/2023         \$770           Hashmall, Joseph         1/9/2023         \$770           Hashmall, Joseph         1/9/2023         \$770           Lodge, Hans W         1/9/2023         \$770           Drake, Eleanor Michelle         1/11/2023         \$1,180           Hashmall, Joseph         1/9/2023         \$770           Hashmall, Joseph         1/12/2023         \$770           Hashmall, Joseph         1/12/2023         \$770           Hashmall, Joseph         1/13/2023         \$770           Hibray, Jean         1/13/2023         \$450	00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	1     77       1     86.5       2     236       2     154       3     231       4     308       2     924       8     616       1     77       1     118       7     539       1     770       7     472.5	Litigation team meeting  Meet with team regarding case strategy team meeting to discuss upcoming deadlines and approach  Email to court reporter regarding Aguado transcript  Email exchange with court reporter regarding Aguado deposition transcript  Review of decision in class cert briefing  Edits to draft court reporter regarding class cert briefing  Edits to draft motion for class certification  Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation  Review of court reporter regarding class certification  It is a court reporter regarding class certification  Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation  Review of court reporter regarding class certification, internal email regarding same
Albanese, John 12/12/2022 \$865 Drake, Eleanor Michelle 12/12/2022 \$1,180 Hashmall, Joseph 12/20/2022 \$770 Hashmall, Joseph 16/2023 \$770 Hashmall, Joseph 1/6/2023 \$770 Hashmall, Joseph 1/6/2023 \$770 Hashmall, Joseph 1/6/2023 \$770 Drake, Eleanor Michelle 1/6/2023 \$770 Drake, Eleanor Michelle 1/6/2023 \$770 Lodge, Hans W 1/9/2023 \$770 Drake, Eleanor Michelle 1/9/2023 \$770 Lodge, Hans W 1/9/2023 \$770 Drake, Eleanor Michelle 1/11/2023 \$770 Hashmall, Joseph 1/9/2023 \$770 Hashmall, Joseph 1/12/2023 \$770 Hashmall, Joseph 1/12/2023 \$770 Hashmall, Joseph 1/12/2023 \$770 Hashmall, Joseph 1/13/2023 \$770 Hashmall, Joseph 1/13/2023 \$770 Hashmall, Joseph 1/13/2023 \$770	00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	1 86.5 2 236 2 154 3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770	Meet with team regarding case strategy team meeting to discuss upcoming deadlines and approach Email to court reporter regarding Aguado transcript Email exchange with court reporter regarding Aguado deposition transcript Review of decision in Edits to draft Calss cert briefing Edits to draft motion for class certification Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation Review of meeting Review of meeting in support of class certification, internal email regarding Revisions to draft brief in support of class certification, internal email regarding same
Drake, Eleanor Michelle         12/12/2022         \$1,180           Hashmall, Joseph         12/20/2022         \$770           Hashmall, Joseph         12/21/2022         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$1,180           Drake, Eleanor Michelle         1/9/2023         \$770           Hashmall, Joseph         1/9/2023         \$770           Lodge, Hans W         1/9/2023         \$675           Drake, Eleanor Michelle         1/11/2023         \$1,180           Hashmall, Joseph         1/9/2023         \$770           Hashmall, Joseph         1/12/2023         \$770           Hashmall, Joseph         1/13/2023         \$770           Hibray, Jean         1/13/2023         \$450	00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	2 236 2 154 3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770 7 472.5	team meeting to discuss upcoming deadlines and approach  Email to court reporter regarding Aguado transcript  Email exchange with court reporter regarding Aguado deposition transcript  Review of decision in  Edits to draft  Calss cert briefing  Edits to draft motion for class certification  Litigation team meeting  team meeting to review upcoming deadlines and next steps in litigation  Review of meeting  Review of meeting in support of class certification, internal email regarding same
Hashmall, Joseph         12/20/2022         \$770           Hashmall, Joseph         12/21/2022         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$770           Hashmall, Joseph         1/6/2023         \$1,180           Drake, Eleanor Michelle         1/9/2023         \$770           Hashmall, Joseph         1/9/2023         \$770           Lodge, Hans W         1/9/2023         \$675           Drake, Eleanor Michelle         1/11/2023         \$1,180           Hashmall, Joseph         1/9/2023         \$770           Hashmall, Joseph         1/12/2023         \$770           Hashmall, Joseph         1/13/2023         \$770           Hibray, Jean         1/13/2023         \$450	00 0. 00 0. 00 0. 00 1. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	2 154 3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770	Email to court reporter regarding Aguado transcript  Email exchange with court reporter regarding Aguado deposition transcript  Review of decision in  Edits to draft  Calss and emails with expert regarding  Edits to draft motion for class certification  Litigation team meeting  team meeting to review upcoming deadlines and next steps in litigation  Review of province of class certification, internal email regarding  Revisions to draft brief in support of class certification, internal email regarding same
Hashmall, Joseph       12/21/2022       \$770         Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Drake, Eleanor Michelle       1/6/2023       \$1,180         Hashmall, Joseph       1/9/2023       \$770         Hashmall, Joseph       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 0. 00 0. 00 1. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	3 231 4 308 2 924 8 616 1 77 1 118 7 539 1 770 7 472.5	Email exchange with court reporter regarding Aguado deposition transcript  Review of decision in class cert briefing  Edits to draft court motion for class certification  Litigation team meeting  team meeting to review upcoming deadlines and next steps in litigation  Review of class certification, internal email to expert regarding court regarding court in the court of class certification, internal email regarding court regarding court in the court of class certification, internal email regarding court court regarding court in the court of class certification, internal email regarding court court in the court of class certification, internal email regarding court court in the court of class certification, internal email regarding court cour
Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Drake, Eleanor Michelle       1/6/2023       \$1,180         Hashmall, Joseph       1/9/2023       \$770         Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 0. 00 1. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	4 308 2 924 8 616 1 77 1 118 7 539 1 770 7 472.5	Review of decision in  Edits to draft  Class cert briefing  Edits to draft  Class certification  Litigation team meeting  team meeting to review upcoming deadlines and next steps in litigation  Review of , internal emails and email to expert regarding  Revisions to draft brief in support of class certification, internal email regarding same
Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Drake, Eleanor Michelle       1/6/2023       \$1,180         Hashmall, Joseph       1/9/2023       \$770         Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 1 00 0. 00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	2 924 8 616 1 77 1 118 7 539 1 770 7 472.5	Edits to draft control of class certification  Litigation team meeting to review upcoming deadlines and next steps in litigation  Review of control of class certification, internal emails and email to expert regarding same
Hashmall, Joseph       1/6/2023       \$770         Hashmall, Joseph       1/6/2023       \$770         Drake, Eleanor Michelle       1/6/2023       \$1,180         Hashmall, Joseph       1/9/2023       \$770         Hashmall, Joseph       1/9/2023       \$675         Lodge, Hans W       1/9/2023       \$1,180         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 0. 00 0. 00 0. 00 0. 00 0. 00 0.	8 616 1 77 1 118 7 539 1 770 7 472.5	Edits to draft motion for class certification Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation Review of the company of the c
Hashmall, Joseph       1/6/2023       \$770         Drake, Eleanor Michelle       1/6/2023       \$1,180         Hashmall, Joseph       1/9/2023       \$770         Hashmall, Joseph       1/9/2023       \$770         Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 0. 00 0. 00 0. 00 0. 00 0.	1 77 1 118 7 539 1 770 7 472.5	Litigation team meeting team meeting to review upcoming deadlines and next steps in litigation Review of the state of the
Drake, Eleanor Michelle       1/6/2023       \$1,180         Hashmall, Joseph       1/9/2023       \$770         Hashmall, Joseph       1/9/2023       \$770         Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$450         Hibray, Jean       1/13/2023       \$450	00 0. 00 0. 00 0. 00 0.	1 118 7 539 1 770 7 472.5	team meeting to review upcoming deadlines and next steps in litigation  Review of, internal emails and email to expert regarding
Hashmall, Joseph       1/9/2023       \$770         Hashmall, Joseph       1/9/2023       \$770         Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$450         Hibray, Jean       1/13/2023       \$450	00 0. 00 0. 00 0.	7 539 1 770 7 472.5	Review of, internal emails and email to expert regarding
Hashmall, Joseph       1/9/2023       \$770         Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$450         Hibray, Jean       1/13/2023       \$450	00 0. 00 0.	770 7 472.5	Revisions to draft brief in support of class certification, internal email regarding same
Lodge, Hans W       1/9/2023       \$675         Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 0.	7 472.5	
Drake, Eleanor Michelle       1/11/2023       \$1,180         Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	00 0.		Read and respond to emails from EMD and Hashmall re:
Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	_		
Hashmall, Joseph       1/12/2023       \$770         Hashmall, Joseph       1/13/2023       \$770         Hibray, Jean       1/13/2023       \$450	_	3 354	email with J. Hashmall re status of motion for class certification
Hashmall, Joseph     1/13/2023     \$770       Hibray, Jean     1/13/2023     \$450			Internal emails regarding class certification brief
Hibray, Jean 1/13/2023 \$450	00 0.		Internal emails regarding
	00 0.		Stamp, finalize expert report and exhibits. E-serve same.
Hashmall, Joseph 1/17/2023 \$770	00 0.		Internal emails regarding class certification brief
	00 0.		Internal email regarding class certification
	00 0.		Review of edits to class certification brief, internal emails regarding the filing of same
	00 0.		Check rules, procedures, for class cert and sealing information
	00 1.		Proof, format memo in support of class cert.
Hibray, Jean 1/24/2023 \$450	-		Draft motion, prop order, declaration in support of class cert. Prepare exhibits 1-10.
	00 1.		Draft motion to seal, memo in support. Research caselaw on sealing for support.
Hashmall, Joseph 1/25/2023 \$770	00 1.	8 1386	Pre-filing review of motion for class certification and supporting documents, internal emails and emails with local counsel regarding same
Hibray, Jean 1/25/2023 \$450	00 0.	2 90	Draft Gentes declaration, email re same
Hibray, Jean 1/25/2023 \$450	_		Prepare under seal/redacted versions of all, finalize and file Motion for Class Cert, Motion to seal, papers. Email under seal docs to opposing.
Hibray, Jean 1/25/2023 \$450	00 0.	6 270	Compile Westlaw and PACER cited orders, prepare hard copies of all for judge's copy.
	00 0.		Prepare judge's copy binder of motion for class cert, motion to seal. Travel to/from dropbox to deliver.
Hibray, Jean 1/25/2023 \$450	00 0.	2 90	Docket class cert filings.
Drake, Eleanor Michelle 1/25/2023 \$1,180	00 0.	5 590	final review of memo and my declaration; approve for filing
Gionnette, Julie 1/26/2023 \$285	00 0.	1 28.5	download and review docket entry re notice of appearance
Hashmall, Joseph 1/27/2023 \$770	00 0.	5 385	Drafting demand letter, internal email regarding same
Hashmall, Joseph 1/30/2023 \$770	00 0.	1 77	Internal email regarding demand letter
Drake, Eleanor Michelle 1/30/2023 \$1,180	00 1.	4 1652	reviw redline and revise demand letter
Hashmall, Joseph 1/31/2023 \$770	00 0.	4 308	Review of Michelle Drake edits to demand letter, further edits to same, internal emails regarding same
Hashmall, Joseph 1/31/2023 \$770	00 0.	7 539	Review of Review
	00 0.	2 90	Proof, finalize and send demand letter
	00 0.	3 231	Review of Defendant's draft letter to the Court, internal email regarding same
	00 0.	385	Emails with opposing counsel regarding case schedule
Hashmall, Joseph 2/7/2023 \$770	00 0.	7 539	Drafting letter to the court regarding briefing schedule, internal emails regarding same
Gionnette, Julie 2/7/2023 \$285	00 0.	2 57	download and review docket entries
	00 0.		Finalize and file letter response re schedule
Drake, Eleanor Michelle 2/7/2023 \$1,180	-		review redline and revise response to scheduling proposal
	00 0.		Review of Defendant's expert report, internal emails regarding response to same
Hashmall, Joseph 2/14/2023 \$770	-		Review of Defendant's expert report, review of expert's deposition transcript, internal emails regarding response to same

Drake, Eleanor Michelle	2/14/2023	\$1,180.00	0.7	926	review dec filed by D, communicate with J Hashmall re responsse
Hashmall, Joseph					
	3/6/2023	\$770.00			Review of voicemail internal email regarding esponse to same
Hashmall, Joseph	3/20/2023	\$770.00			Review of draft to client
Hibray, Jean	3/20/2023	\$450.00			Draft insert; prepare and send
Hashmall, Joseph	3/21/2023	\$770.00			Email with Michelle Drake regarding next steps in case
Hashmall, Joseph	4/3/2023	\$770.00			Litigation team meeting
Hibray, Jean	4/11/2023	\$450.00			Review order on briefing, docket accordingly
Hashmall, Joseph	4/24/2023	\$770.00			Review of Defendant's response to motion to certify class
Hashmall, Joseph	4/24/2023	\$770.00			Outlining reply in support of motion for class certification
Gionnette, Julie	4/24/2023	\$285.00			download and review 18 docket entries (ECF 47-51); review local rules for JCH to determine reply page limits
Hashmall, Joseph	4/25/2023	\$770.00	3	2310	Researching and outlining reply in support of class certification
Hashmall, Joseph	4/26/2023	\$770.00	4	3080	Drafting reply in support of class certification
Hashmall, Joseph	4/27/2023	\$770.00	4.7	3619	Drafting and revising reply in support of class certification, internal email regarding same
Hashmall, Joseph	4/28/2023	\$770.00	0.4	308	Revisions to reply in support of class certification
Gionnette, Julie	4/28/2023	\$285.00	0.1	28.5	download and review docket entry
Hashmall, Joseph	5/1/2023	\$770.00	0.2	154	Internal email regarding reply in support of class certification
Hashmall, Joseph	5/2/2023	\$770.00	0.2	154	Internal email regarding reply in support of class certification
Drake, Eleanor Michelle	5/2/2023	\$1,180.00	4.2		review opening class cert brief and response. Review redline and revise reply brief to make sure all arugments are covered and addressed. Correspondence with J hashmall re motion to strike.
Hashmall, Joseph	5/3/2023	\$770.00	1.6	1232	Drafting motion to strike, internal emails regarding same
Hashmall, Joseph	5/3/2023	\$770.00	1.3	1001	Review of Michelle Drake's edit to class certification reply, further edits to same
Gionnette, Julie	5/3/2023	\$285.00	0.1	28.5	download and review docket entry
Hibray, Jean	5/3/2023	\$450.00	0.4	180	Draft declarations, prop order, motion for Friday filings
Hibray, Jean	5/3/2023	\$450.00	0.7	315	Proof, format memo ISO motion to strike
Hashmall, Joseph	5/4/2023	\$770.00	0.9	693	Review of proofing edits to reply in support of certification,
Hibray, Jean	5/4/2023	\$450.00	1		Proof, format reply ISO motion for class cert
Drake, Eleanor Michelle	5/4/2023	\$1,180.00	2.6		review redline and revise reply brief in support of class certification
Drake, Eleanor Michelle	5/4/2023	\$1,180.00	1.7	2006	review redline and revise brief in support of motion to strike
Hashmall, Joseph	5/5/2023	\$770.00			Edits to reply regarding class certification, internal emails regarding same
Hashmall, Joseph	5/5/2023	\$770.00			Edits to motion to strike, internal emails regarding same
Hashmall, Joseph	5/5/2023	\$770.00			Final pre-filing review of reply in support of class certification
Hashmall, Joseph	5/5/2023	\$770.00			Final pre-filing review of motion to strke
Gionnette, Julie	5/5/2023	\$285.00			download and review docket entries
Hibray, Jean	5/5/2023	\$450.00			Proof, finalize reply ISO class cert. Update declaration, compile exhibits. Finalize and file.
Hibray, Jean	5/5/2023	\$450.00			Proof, finalize motion to strike, update papers, prepare exhibits. Finalize and file.
Hibray, Jean	5/5/2023	\$450.00			Emails to set up judge copies for delivery
Hashmall, Joseph	5/16/2023	\$770.00			Litigation team meeting
Hashmall, Joseph	5/17/2023	\$770.00			Email exchange with opposing counsel regarding settlement
Hashmall, Joseph	5/17/2023	\$770.00			Call with Michelle Drake regarding potential mediation
		-			Email exchange with opposing counsel regarding mediation, internal emails regarding same
Hashmall, Joseph	5/19/2023	\$770.00			3 11 3 3 3 7
Gionnette, Julie	5/19/2023	\$285.00			download and review docket entries
Gionnette, Julie	5/22/2023	\$285.00			download and review docket entry
Hashmall, Joseph	5/25/2023	\$770.00			Internal emails and emails to opposing counsel regarding mediation
Hashmall, Joseph	5/25/2023	\$770.00			Review of file and cert brief in advance of further motion to stike briefing
Hashmall, Joseph	5/26/2023	\$770.00			Email with opposing counsel regarding filing deadlines
Hashmall, Joseph	5/30/2023	\$770.00			Review of Defendant's response to motion to strike, internal email regarding response deadline to same
Gionnette, Julie	5/30/2023	\$285.00			download and review docket entries; update calendar deadline
Hashmall, Joseph	5/31/2023	\$770.00			Emails with opposing counsel regarding mediation, internal emails regarding same
Hashmall, Joseph	6/5/2023	\$770.00			Internal emails and emails with opposing counsel regarding mediation schedule
Gionnette, Julie	6/5/2023	\$285.00	0.1		download and review docket entry
Hashmall, Joseph	6/6/2023	\$770.00	1.3	1001	Drafting reply in support of motion to strike
Hashmall, Joseph	6/7/2023	\$770.00	0.3	231	Emails with opposing counsel and internal emails regarding mediation scheduling

Hashmall, Joseph	6/7/2023	\$770.00			Outlining reply in support of motion to strike
Hashmall, Joseph	6/8/2023	\$770.00			Drafting reply in support of motion to strike, internal email regarding same
Hashmall, Joseph	6/8/2023	\$770.00			Call with opposing counsel regarding settlement
Hashmall, Joseph	6/12/2023	\$770.00			Review of draft motion to stay, email with opposing counsel regarding same
Hashmall, Joseph	6/12/2023	\$770.00	-	154	Email exchange with Michelle Drake regarding draft reply in support of motion to strike
Gionnette, Julie	6/12/2023	\$285.00	-		download and review docket entries
Drake, Eleanor Michelle	6/12/2023	\$1,180.00	1		review redline and revise reply on motion to strike
Hashmall, Joseph	6/13/2023	\$770.00	3.7		Review of Michelle Drake edits to motion to strike reply, further edits to same, internal emails regarding same
Hibray, Jean	6/13/2023	\$450.00	-		Proof, finalize reply. File same
Gionnette, Julie	6/13/2023	\$285.00	-		download and review docket entry
Drake, Eleanor Michelle	6/13/2023	\$1,180.00	1.2	1416	review redline and revise reply in support of motion to strike
Hashmall, Joseph	6/15/2023	\$770.00	0.3	231	Email to opposing counsel regarding mediation plan
Hashmall, Joseph	6/16/2023	\$770.00	0.2	154	Call with opposing counsel regarding settlement, mediator selection
Hashmall, Joseph	6/20/2023	\$770.00	0.2	154	Email to opposing counsel regarding mediation plan
Hashmall, Joseph	6/20/2023	\$770.00	0.6	462	Review of email from the Court regarding closing case, internal emails and emails with local counsel regarding response to same
Hashmall, Joseph	6/20/2023	\$770.00	0.2	154	Review of file status
Hashmall, Joseph	6/21/2023	\$770.00	0.4		Email to court regarding closing of case, internal emails regarding same
Hashmall, Joseph	6/23/2023	\$770.00	0.4	308	Email to opposing counsel regarding settlement, email to local counsel regarding same
Gionnette, Julie	6/23/2023	\$285.00	0.1	28.5	download and review docket entry
Hashmall, Joseph	6/26/2023	\$770.00	0.3	231	Internal emails regarding
Hashmall, Joseph	6/26/2023	\$770.00	0.1	77	Litigation team meeting
Albanese, John	6/26/2023	\$865.00	0.1	86.5	Discuss strategy with case team.
Hashmall, Joseph	6/29/2023	\$770.00	0.1	77	Internal email regarding
Hibray, Jean	6/29/2023	\$450.00	0.1	45	Draft
Hashmall, Joseph	6/30/2023	\$770.00	0.2	154	Voicemail to opposing counsel regarding settlement
Hibray, Jean	7/5/2023	\$450.00	0.2	90	Prepare and send
Hashmall, Joseph	7/6/2023	\$770.00	0.1	77	Email with opposing counsel setting up time to discuss case
Hashmall, Joseph	7/7/2023	\$770.00	0.7	539	Call and email with opposing counsel regarding settlement, internal emails regarding next steps
Hashmall, Joseph	7/11/2023	\$770.00	0.3	231	Internal email and emails to opposing counsel regarding mediation dates
Hashmall, Joseph	7/13/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding settlement
Hashmall, Joseph	7/18/2023	\$770.00	0.3	231	Email exchange with opposing counsel regarding order on motion to stay
Hashmall, Joseph	7/19/2023	\$770.00	0.1	77	Internal review of case status and deadlines
Hashmall, Joseph	7/20/2023	\$770.00	0.2	154	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	7/26/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	7/27/2023	\$770.00	0.3	231	Emails with opposing counsel and internal emails regarding mediation dates
Hashmall, Joseph	7/28/2023	\$770.00		154	Review of case status
Hashmall, Joseph	7/31/2023	\$770.00	0.4	308	Review of status of settlement talks, call with Michelle Drake regarding next steps in same
Drake, Eleanor Michelle	7/31/2023	\$1,180.00			call with J Hashmall re status of negotiaitons, schedulding mediation
Hashmall, Joseph	8/2/2023	\$770.00			Internal email regarding settement talk status
Drake, Eleanor Michelle	8/2/2023	\$1,180.00			call with D Gettings re settlement negotiations, data status, timing
Hashmall, Joseph	8/3/2023	\$770.00	-		Internal email regarding settement talk status
Hashmall, Joseph	8/4/2023	\$770.00	-		Review of status of settlement talks
Hashmall, Joseph	8/7/2023	\$770.00	-	77	Internal email regarding settement talk status
Hashmall, Joseph	8/7/2023	\$770.00	-		Litigation team meeting
Hashmall, Joseph	8/7/2023	\$770.00	-		Internal emails and email to opposing counsel regarding settlement
Hashmall, Joseph	8/28/2023	\$770.00	-		Internal emails and email to opposing counsel regarding mediation dates
Hashmall, Joseph	8/29/2023	\$770.00			Voicemail and email to client
Hashmall, Joseph	8/30/2023	\$770.00	-		Call with client regarding
Albanese, John	8/31/2023	\$865.00	-		Discuss case with case team.
Hashmall, Joseph	8/31/2023	\$770.00	-		Email to client regarding
Hashmall, Joseph	8/31/2023	\$770.00			Email to opposing counsel regarding mediation schedule
пазници, зозерн	0/31/2023	φ//0.00	0.2	134	Email to opposing counsel regarding inediation schedule

Hashmall, Joseph	8/31/2023	\$770.00			Litigation team meeting
Drake, Eleanor Michelle	8/31/2023	\$1,180.00			meet with team re next steps
Hashmall, Joseph	9/5/2023	\$770.00	0.2	154	Call with opposing counsel regarding case resolution
Hashmall, Joseph	9/6/2023	\$770.00	0.3	231	Email to mediators office regarding mediation briefs
Hibray, Jean	9/6/2023	\$450.00	0.1	45	Email with mediator's office
Hashmall, Joseph	9/8/2023	\$770.00	1.8	1386	Drafting mediation statement
Hashmall, Joseph	9/11/2023	\$770.00	0.5	385	Edits to draft mediation statement, internal emails attaching same
Hashmall, Joseph	9/12/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of settlement talks
Hashmall, Joseph	9/13/2023	\$770.00	0.5	385	Review of Michelle Drake's edits to mediation brief, further edits to same, internal emails regarding same
Drake, Eleanor Michelle	9/13/2023	\$1,180.00	1.4	1652	review redline and revise mediation statement
Hashmall, Joseph	9/15/2023	\$770.00	0.3	231	Review of email from mediator's office regarding time for call, internal email regarding same
Hashmall, Joseph	9/18/2023	\$770.00	0.6	462	Internal emails and emails with mediators office regarding upcoming call with mediator
Hashmall, Joseph	9/18/2023	\$770.00	0.7		Edits to draft mediation statement, internal email regarding same
Hashmall, Joseph	9/18/2023	\$770.00	0.2	154	Review of mediation agreement, internal emails regarding signatures on same
Hashmall, Joseph	9/19/2023	\$770.00			Review of case file in advance of call with mediator, call with mediator
Hashmall, Joseph	9/19/2023	\$770.00			Final pre-service review of mediation brief, exhibits, internal emails regarding same
Hibray, Jean	9/19/2023	\$450.00			Email with mediator re documentation
Hibray, Jean	9/19/2023	\$450.00			Proof, finalize mediation statement, compile exhibits; email with J Hashmall re final packet, submit to mediator
Hashmall, Joseph	9/20/2023	\$770.00			Drafting , email to Michelle Drake regarding same
Hashmall, Joseph	9/22/2023	\$770.00			Pre-mediation email exchange with opposing counsel
Hashmall, Joseph	9/25/2023	\$770.00			Email to opposing counsel regarding mediation
Hashmall, Joseph	9/25/2023	\$770.00			Review of settlement communication from opposing counsel, internal emails regarding same
Hashmall, Joseph	9/26/2023	\$770.00			Prepare for mediation, including emails to Michelle Drake
					Attend mediation
Hashmall, Joseph	9/26/2023	\$770.00			
Hibray, Jean	9/26/2023	\$450.00			Pull for attorney review
Drake, Eleanor Michelle	9/26/2023	\$1,180.00			prepare for and attend mediation
Hashmall, Joseph	9/27/2023	\$770.00			Email exchange with client regarding
Hashmall, Joseph	10/3/2023	\$770.00			Call with opposing counsel regarding settlement of case
Hashmall, Joseph	10/3/2023	\$770.00			Call with Michelle Drake regarding settlement of case
Hashmall, Joseph	10/3/2023	\$770.00			Call with opposing counsel regarding settlement, follow up call with Michelle Drake regarding same
Drake, Eleanor Michelle	10/3/2023	\$1,180.00			calls and emails with oc re potential resolution
Gionnette, Julie	10/4/2023	\$285.00			review email from JH; calendar deadline per ECF 63
Hashmall, Joseph	10/4/2023	\$770.00			Internal emails and emails with mediator regarding resolution of the case
Hashmall, Joseph	10/4/2023	\$770.00			Call with client regarding
Hashmall, Joseph	10/4/2023	\$770.00			Email exchange with opposing counsel regarding settlement terms
Hashmall, Joseph	10/4/2023	\$770.00	0.5	385	Review of upcoming deadlines in case, internal emails regarding same
Hashmall, Joseph	10/5/2023	\$770.00			Litigation team meeting
Hashmall, Joseph	10/5/2023	\$770.00			Review of mediation invoice, internal emails regarding same
Drake, Eleanor Michelle	10/5/2023	\$1,180.00	0.1	118	team meeting to discuss case status
Hashmall, Joseph	10/9/2023	\$770.00	0.1	77	Email to opposing counsel regarding draft settlement
Hashmall, Joseph	10/11/2023	\$770.00	0.2	154	Email exchange with opposing counsel regarding status of settlement
Hashmall, Joseph	10/17/2023	\$770.00	0.1	77	Email to opposing counsel regarding draft settlement
Hashmall, Joseph	10/19/2023	\$770.00	0.1	77	Email to opposing counsel regarding status of draft settlement
Hashmall, Joseph	10/20/2023	\$770.00	0.2		Email exchange with opposing counsel regarding status of draft settlement
Hashmall, Joseph	10/24/2023	\$770.00	0.2	154	Email to opposing counsel regarding settlement status
Hashmall, Joseph	10/24/2023	\$770.00			Review of draft status report to Court, internal emails regarding same
Hibray, Jean	10/24/2023	\$450.00			Draft notice of status
Hashmall, Joseph	10/25/2023	\$770.00			Call with opposing counsel regarding draft settlement, status update to court; email to opposing counsel regarding same
Hashmall, Joseph	10/26/2023	\$770.00			Internal emails and emails with opposing counsel regarding filing of status update with court
Gionnette, Julie	10/26/2023	\$285.00			download and review docket entry (ECF 64)
Hibray, Jean	10/26/2023	\$450.00			Finalize and file notice
Hashmall, Joseph	10/30/2023	\$770.00			Email to opposing counsel regarding draft settlement
i lasi ii laii, sosepii	10,30,2023	ψ//0.00	5.1	11	Email to opposing counsel regulating draft settlement

Hashmall, Joseph	11/1/2023	\$770.00	0.2	154 Email exchange with opposing counsel regarding draft settlement
Hashmall, Joseph	11/3/2023	\$770.00	1.3	1001 Review of and revisions to draft settlement agreement from Defendant, internal email and email to opposing counsel regarding same
Hashmall, Joseph	11/6/2023	\$770.00	0.2	154 Emails with opposing counsel setting time to discuss draft settlement
Hashmall, Joseph	11/7/2023	\$770.00	_	231 Call with opposing counsel regarding draft settlement
lashmall, Joseph	11/7/2023	\$770.00	-	616 Edits to draft settlement agreement, emails with Michelle Drake regarding same
Orake, Eleanor Michelle	11/7/2023	\$1,180.00	-	944 call re settlement status
Hashmall, Joseph	11/8/2023	\$770.00	-	154 Internal email regarding draft settlement
lashmall, Joseph	11/9/2023	\$770.00	-	77 Litigation team call
Orake, Eleanor Michelle	11/9/2023	\$1,180.00	-	826 final review of redline to draft settlement agreement before sending back to opposing counsel
·		\$770.00	-	154 Email exchange with opposing counsel regarding draft settlement
Hashmall, Joseph	11/13/2023		-	
Hashmall, Joseph	11/15/2023	\$770.00	-	154 Internal email regarding mediation invoice
lashmall, Joseph	11/16/2023	\$770.00	-	154 Email to opposing counsel regarding draft settlement
Hashmall, Joseph	11/16/2023	\$770.00	-	154 Email to client
lashmall, Joseph	11/16/2023	\$770.00	-	77 Internal email regarding mediation invoice
lashmall, Joseph	11/17/2023	\$770.00	-	231 Review of internal emails, email to mediator regarding invoice
lashmall, Joseph	11/20/2023	\$770.00	-	154 Email to opposing counsel regarding settlement
lashmall, Joseph	11/21/2023	\$770.00	-	231 Email exchange with opposing counsel regarding draft settlement
Hashmall, Joseph	11/22/2023	\$770.00	-	Review of Defendant's edits to settlement agreement, internal emails regarding response to same
lashmall, Joseph	11/27/2023	\$770.00	-	154 Internal email regarding draft settlement
lashmall, Joseph	11/28/2023	\$770.00	0.2	154 Email to opposing counsel regarding draft settlement
Hashmall, Joseph	11/29/2023	\$770.00	0.3	231 Call with opposing counsel regarding draft settlement
Hashmall, Joseph	11/29/2023	\$770.00	0.5	Revisions to draft settlement, internal emails regarding same
Orake, Eleanor Michelle	11/29/2023	\$1,180.00	0.5	call with oc and follow up with J Hashmall re settlement documents
lashmall, Joseph	11/30/2023	\$770.00	0.1	77 Internal email regarding settlement draft
lashmall, Joseph	12/1/2023	\$770.00	0.5	385 Internal email and email to opposing counsel regarding draft settlement agreement
Drake, Eleanor Michelle	12/1/2023	\$1,180.00	0.4	472 review and approve sending revised settlement agreement to oc
Hashmall, Joseph	12/5/2023	\$770.00	0.1	77 Email to opposing counsel regarding status of settlement
Hashmall, Joseph	12/13/2023	\$770.00	2.2	Review of Defendant's edits to settlement agreement, internal emails and emails with opposing counsel regarding same, internal emails regarding same
Hibray, Jean	12/13/2023	\$450.00	0.8	360 Proof Settlement Agreement, prepare timeline
Hibray, Jean	12/13/2023	\$450.00	-	360 Draft exhibits to Settlement Agreement
Hashmall, Joseph	12/14/2023	\$770.00	-	77 Litigation team meeting
Hashmall, Joseph	12/14/2023	\$770.00		1309 Review of and edits to draft exhibits to settlement agreement, internal emails and emails to opposing counsel regarding same
Hibray, Jean	12/14/2023	\$450.00	0.3	135 Edit settlement exhibits, email J Hashmall
Orake, Eleanor Michelle	12/14/2023	\$1,180.00	-	118 meet with team re next steps
Hashmall, Joseph	12/15/2023	\$770.00	-	231 Email exchange with client regarding
Hashmall, Joseph	12/15/2023	\$770.00	-	231 Email exchange with potential administrator regarding bid for services
Hibray, Jean	12/16/2023	\$450.00	-	1125 Draft memo ISO motion for prelim approval, research for same
Hashmall, Joseph	12/18/2023	\$770.00	-	77 Email to opposing counsel regarding settlement status
Hashmall, Joseph	12/18/2023	\$770.00	-	1232 Review of and edits to draft preliminary approval brief
Hibray, Jean	12/18/2023	\$450.00	-	360 Cite check draft prelim approval memo, submit draft to J Hashmall
Hashmall, Joseph	12/19/2023	\$770.00	-	462 Review of settlement administration bid
· · ·		\$770.00	-	
Hashmall, Joseph	12/21/2023	· ·	-	77 Email to opposing counsel regarding status of settlement papers
Hashmall, Joseph	12/21/2023	\$770.00 ¢450.00	-	154 Review of case schedule and timeline
libray, Jean	12/22/2023	\$450.00	-	90 DocuSign emails re
Hashmall, Joseph	12/22/2023	\$770.00		616 Review of opposing counsel's edits to settlement exhibits, email exchange regarding same
Hashmall, Joseph	12/22/2023	\$770.00	-	616 Finalizing settlement for signature, emails with client
Hashmall, Joseph	12/22/2023	\$770.00	-	77 Internal email regarding preliminary approval brief
Hashmall, Joseph	12/27/2023	\$770.00	-	Internal emails and email to opposing counsel regarding draft settlement
Hashmall, Joseph	12/28/2023	\$770.00		616 Internal emails and emails and voicemail to opposing counsel regarding edit to draft settlement agreement
Hashmall, Joseph	12/29/2023	\$770.00	0.2	154 Call with opposing counsel regarding revised settlement agreement

Hashmall, Joseph	12/29/2023	\$770.00 0.5	385 Internal emails and emails to opposing counsel regarding revision to settlement agreement
Hashmall, Joseph	1/2/2024	\$770.00 0.3	154 Email to client regarding
			154 Internal email regarding preliminary approval brief
Hashmall, Joseph	1/2/2024	\$770.00 0.2	
Hashmall, Joseph	1/2/2024	\$770.00 0.2	154 Email exchange with opposing counsel regarding draft settlement
Hibray, Jean	1/2/2024	\$450.00 0.3	135 Prepare new DocuSign, send same; emails re sig pages
Hashmall, Joseph	1/3/2024	\$770.00 0.1	77 Email to opposing counsel regarding settlement signatures
Hashmall, Joseph	1/4/2024	\$770.00 0.8	616 Review of Michelle Drake edits to preliminary approval brief, further edits to same
Hibray, Jean	1/4/2024	\$450.00 0.5	225 Review procedures for filing tomorrow
Drake, Eleanor Michelle	1/4/2024	\$1,180.00 1.5	1770 review redline and revise motion for preliminary approval
Hashmall, Joseph	1/5/2024	\$770.00 0.2	154 Call with Michelle Drake regarding preliminary approval brief
Hashmall, Joseph	1/5/2024	\$770.00 0.1	77 Email retaining settlement administrator
Hashmall, Joseph	1/5/2024	\$770.00 0.7	539 Final pre-filing review of preliminary approval papers
Hibray, Jean	1/5/2024	\$450.00 1	Proof and finalize memo for prelim approval; draft dec, motion. Update PAO.
Hibray, Jean	1/5/2024	\$450.00 0.4	180 Compile fully executed agreement, finalize agreement exhibits.
Hibray, Jean	1/5/2024	\$450.00 0.5	225 Finalize and file motion for prelim approval, email to admin, email Word versions of notices to same; prep judge copy and send for service
Drake, Eleanor Michelle	1/5/2024	\$1,180.00 0.5	590 final review and approval of memo in support of preliminary settlement approval
Hashmall, Joseph	1/9/2024	\$770.00 0.2	154 Call with admin regarding edits to administration bid, review of revised bid, internal emails regarding same
Hashmall, Joseph	1/10/2024	\$770.00 0.3	231 Research regarding new judicial assignment, internal email regarding same
Hashmall, Joseph	1/10/2024	\$770.00 0.2	Review of email from administrator regarding settlement website, response to same
Hashmall, Joseph	1/12/2024	\$770.00 0.6	Review of draft settlement notices, edits to same, email to admin regariding same
Hashmall, Joseph	1/16/2024	\$770.00 0.1	77 Review of revised administrator engagement letter
Hashmall, Joseph	1/17/2024	\$770.00 0.2	154 Review of final approval order, internal email regarding same
Gionnette, Julie	1/17/2024	\$285.00 0.4	114 review docket entries (ECF 67-68); calendar deadline
Hashmall, Joseph	1/18/2024	\$770.00 0.8	616 Review of preliminary approval order, internal emails regarding settlement schedule
Hashmall, Joseph	1/18/2024	\$770.00 0.5	385 Emails with settlement administrator regarding preliminary approval and settlement logistics
Hibray, Jean	1/18/2024	\$450.00 0.8	360 Review order, update timeline, docket accordingly
Hashmall, Joseph	1/19/2024	\$770.00 0.3	231 Review of draft email notices, email to administrator regarding edits to same
Hashmall, Joseph	1/22/2024	\$770.00 0.6	462 Review of edits to settlement notices, emails to administrator and opposing counsel regarding same
Hashmall, Joseph	1/22/2024	\$770.00 0.4	308 Review of settlement timeline and deadlines
Hashmall, Joseph	1/29/2024	\$770.00 0.3	231 Email to client regarding
Albanese, John	1/30/2024	\$865.00 0.1	86.5 Meet with case team regarding case stategy
Hashmall, Joseph	1/30/2024	\$770.00 0.6	462 Email with administator regarding
Drake, Eleanor Michelle	1/30/2024	\$1,180.00 0.1	118 team call to touch base on next steps in litigation
Hashmall, Joseph	1/31/2024	\$770.00 0.2	154 Emails with client regarding
Hashmall, Joseph	2/8/2024	\$770.00 0.2	154 Email to admin regarding
Hashmall, Joseph	2/12/2024	\$770.00 0.2	154 Email exchange with admin regarding claims process
Hashmall, Joseph	2/12/2024	\$770.00 0.3	231 Emails with client regarding adding process
Hashmall, Joseph	2/12/2024	\$770.00 0.1	77 Internal email regarding drafting of fee petition
Hashmall, Joseph	2/15/2024	\$770.00 0.1	154 Email exchange with client regarding
Hashmall, Joseph	2/16/2024	\$770.00 0.2	154 Email exchange with administrator regarding claims
Hashmall, Joseph	2/19/2024	\$770.00 0.2	231 Email exchange with local counsel regarding fee petition
Hashmall, Joseph	2/26/2024	\$770.00 0.3	77 Internal email regarding fee petition
Hibray, Jean	2/27/2024	\$450.00 2	900 Work on drafting fee petition.
Hibray, Jean	2/29/2024	\$450.00 1	450 Drafting of fee petition, research caselaw in support, review
Hashmall, Joseph	3/4/2024	\$770.00 0.2	154 Review of administrator invoice, email exchange regarding same
Hashmall, Joseph	3/5/2024	\$770.00 0.4	308 Call and emails with administrator regarding fraudulent claim
Hashmall, Joseph	3/14/2024	\$770.00 0.1	77 Internal email regarding staffing final approval hearing
Hashmall, Joseph	3/14/2024	\$770.00 1.2	924 Edits to fee petition, internal emails regarding same